WestSide New Zealand Ltd Rimu Production Station Monitoring Programme Annual Report 2019-2020

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Executive summary

WestSide New Zealand Ltd (WestSide) operates a petrochemical production station located on Mokoia Road at Mokoia, in the Manawapou catchment. This report for the period July 2019 to June 2020 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.

The Company holds two resource consents, which include a total of 26 conditions setting out the requirements that the Company must satisfy. The Company holds one consent to allow it to discharge treated stormwater onto and into land and into an unnamed tributary of the Manawapou River, and one consent to discharge contaminants into the air at this site.

During the monitoring period, WestSide New Zealand Ltd demonstrated an overall high level of environmental performance.

The Council's monitoring programme for the year under review included four inspections of the Rimu Production Station, one inspection of associated wellsites, six water samples collected for physicochemical analysis, and two ambient air quality analyses.

The monitoring showed that the site was generally tidy and well managed and that the stormwater discharge was not having a significant adverse effect on the water quality of the unnamed tributary of the Manawapou River. There were no adverse effects on the environment found as a result of the exercise of the air discharge consent. Ambient air quality monitoring at the site showed that levels of carbon monoxide, combustible gases, PM₁₀ particulates, and nitrogen oxides were all below levels of concern at the time of sampling. No offensive or objectionable odours were detected beyond the boundary during inspections, and there were no complaints in relation to air emissions from the site.

During the monitoring period, the Company demonstrated a high level of both environmental performance and administrative compliance with respect to their resource consents.

For reference, in the 2019-2020 year, consent holders were found to achieve a high level of environmental performance and compliance for 81% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 17% 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 remains at a high level.

This report includes recommendations for the 2020-2021 year.

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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 2019 to June 2020 by the Taranaki Regional Council (the Council) on the monitoring programme associated with resource consents held by WestSide New Zealand Ltd (WestSide). WestSide operates a petrochemical production station situated on Mokoia Road at Mokoia, in the Manawapou catchment.

The report includes the results and findings of the monitoring programme implemented by the Council in respect of the consents held by WestSide that relate to discharges of water within the Manawapou catchment, and the air discharge permit 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 report discusses the environmental effects of the Company's use of water, land and air, and is the 19th combined annual report by the Council for the Rimu Production Station.

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 though annual programmes;
- the resource consents held by the Company in the Manawapou catchment;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted at the Rimu Production Station.

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 2020-2021 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' inasmuch 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 management and, ultimately, through the refinement of methods and considered responsible 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 Company, this report also assigns them a rating for their environmental and administrative performance during the period under review.

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 <u>in site operations and 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.

For reference, in the 2019-2020 year, consent holders were found to achieve a high level of environmental performance and compliance for 81% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 17% of the consents, a good level of environmental performance and compliance was achieved.¹

1.2 Process description

The Rimu Production Station (Photo 1) receives oil and gas recovered from the Rimu, Kauri and Manutahi wells and includes condensate, gas and LPG processing plants. The oil and gas are separated and treated to produce condensate for export from the site; gas suitable for export into Vector's pipeline; and LPG for sale and export. Construction started in May 2001 and the plant was commissioned between February and April 2002.

The Rimu Production Station is situated on Mokoia Road, between the coast and State Highway 3, south east of Hawera. The production station covers approximately 6 hectares on an area of 9.5 hectares of land leased by WestSide. The land is situated on top of a coastal terrace. The closest residential dwelling is approximately 800 metres from the production station. The surrounding land use is largely pastoral.

Stormwater from the production station, including potentially contaminated stormwater from the production area and tank storage area, is treated through an API separator and then directed into a

¹ The Council has used these compliance grading criteria for 15 years. They align closely with the 4 compliance grades in the MfE Best Practice Guidelines for Compliance, Monitoring and Enforcement, 2018

polyethylene lined storage pond located at the southern edge of the site. The pond has a storage capacity of 3,600 m³ and it serves as a settlement pond and a fire water source in the event of an emergency. Water from the stormwater pond is discharged by pipe onto land to the east of the site where it flows into an unnamed tributary of the Manawapou River.

The production station and associated wellsites were divested to WestSide New Zealand Ltd on 1 November 2016 from Origin Energy Resources NZ Ltd.



Photo 1 Rimu Production Station

1.3 Resource consents

WestSide holds two resource consents for the Production Station, the details of which are summarised in the table below. Summaries of the conditions attached to each permit are set out in Section 3 of this report.

A summary of the various consent types issued by the Council is included in Appendix I, as are copies of all permits held by the Company during the period under review.

Table 1 Summary of consents held by WestSide for the Rimu Production Station

Consent number	Purpose	Granted	Review	Expires
5744-2	To discharge treated stormwater from the Rimu Production Station onto and into land and into an unnamed tributary of the Manawapou River	November 2016	June 2022	June 2034
5746-2	To discharge contaminants into the air from the Rimu Production Station, including flaring and miscellaneous emissions	November 2016	June 2022	June 2034

1.3.1 Related consents

WestSide also holds consents for production activities at wellsites associated with the Rimu Production Station. Details of these consents are summarised in Table 2.

Table 2 Consents for production activities at wellsites associated with the Rimu Production Station

Wellsite	Consent number	Purpose	Issue date	Expiry
	5730-1	To discharge treated stormwater and treated site water from hydrocarbon exploration and production operations at the Kauri Te Pakakohi-A wellsite onto and into land	01/12/2000	2022
Kauri-A 5731-1		To discharge emissions into the air from the flaring of hydrocarbons and miscellaneous emissions associated with hydrocarbon exploration and production testing operations involving up to 32 zones and from production flaring at the Kauri Te Pakakohi-A wellsite	01/12/2000	2022
Kauri-A & F	6129-1	To discharge emissions to air from flaring (at either the Kauri-F or Kauri Te Pakakohi-A wellsites) associated with production activities and miscellaneous emissions at the Kauri-F wellsite	06/03/2003	2022
Kauri-C	5928-2	To discharge treated stormwater from hydrocarbon exploration and production operations from the Kauri-C wellsite onto and into land	01/11/2016	2034
Kauri-D	5951-2	To discharge treated stormwater from hydrocarbon exploration and production operations at the Kauri-D wellsite onto and into land	01/11/2016	2034
Kauri-F	6130-1	To discharge emissions to air from flaring associated with production activities and miscellaneous emissions at the Kauri-F wellsite	26/02/2003	2022
Vauri E	6140-1	To discharge treated stormwater, uncontaminated treated site water and uncontaminated treated production water from hydrocarbon exploration and production operations at the Kauri-E wellsite onto and into land and into the Waikaikai Stream	24/04/2003	2022
Kauri-E	6141-1	To discharge treated stormwater, uncontaminated treated site water and uncontaminated treated production water from hydrocarbon exploration and production operations at the Kauri-E Wellsite onto and into land and into the Mangaroa Stream	22/04/2003	2022
Manutahi-A	6299-1	To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Manutahi-A wellsite	05/04/2004	2022

Wellsite	Consent number	Purpose	Issue date	Expiry
	6300-1	To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Manutahi-A wellsite onto and into land in the vicinity of an unnamed tributary of the Mangaroa Stream	05/04/2004	2022
	6305-1	To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Manutahi-B wellsite	21/04/2004	2022
Manutahi-B	6306-1	To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Manutahi-B wellsite onto and into land in the vicinity of an unnamed tributary of the Mangaroa Stream	20/04/2004	2022
	6311-1	To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Manutahi-C wellsite	06/04/2004	2022
Manutahi-C	6312-1	To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Manutahi-C wellsite onto and into land in the vicinity of an unnamed tributary of the Mangaroa Stream	06/04/2004	2022
	6317-1	To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Manutahi-D wellsite	20/04/2004	2022
Manutahi-D	6318-1	To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Manutahi-D wellsite onto and into land in the vicinity of an unnamed tributary of the Mangaroa Stream	20/04/2004	2022
Manutahi-E	6323-1	To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Manutahi-E wellsite	08/06/2004	2022
	6324-1	To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Manutahi-E wellsite onto and into land in the vicinity of the Mangaroa Stream and Lake Kaikoura	13/07/2004	2022
Manutahi-F	6329-1	To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Manutahi-F wellsite	09/06/2004	2022

Wellsite	Consent number	Purpose	Issue date	Expiry
	6330-1	To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Manutahi-F wellsite onto and into land in the vicinity of the Mangaroa Stream and Lake Kaikoura	16/07/2004	2022
Manutahi-G	6335-1	To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Manutahi-G wellsite	01/06/2004	2022
Manutahi-G	6336-1	To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Manutahi-G wellsite onto and into land in the vicinity of an unnamed tributary of the Mangaroa Stream	01/06/2004	2022
	6341-1	To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Manutahi-H wellsite	02/06/2004	2022
Manutahi-H	6342-1	To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Manutahi-H wellsite onto and into land in the vicinity of an unnamed tributary of the Mangaroa Stream	02/06/2004	2022
Rimu-A	5322-2	To discharge treated stormwater from hydrocarbon exploration and production operations at the Rimu-A wellsite onto land and into an unnamed tributary of the Manawapou River	01/11/2016	2034
Rimu-A	To discharge contaminants to air from hydrocarbon exploration at the Rimu-A wellsite, including combustion involving flaring or		01/11/2016	2034
	5625-1	To discharge treated stormwater and treated site water from hydrocarbon exploration and production operations at the Rimu-B wellsite onto and into land and into an unnamed tributary of the Manawapou River	27/06/2000	2022
Rimu-B	5626-1	To discharge emissions into the air from the flaring of hydrocarbons and miscellaneous emissions associated with hydrocarbon exploration and production testing operations involving up to 10 zones and from production flaring at the Rimu-B wellsite	27/06/2000	2022

Wellsite	Consent number	Purpose	Issue date	Expiry
6749-1 Pohutukawa-A		To discharge treated stormwater and treated produced water from hydrocarbon exploration and production operations at the Pohutakawa-A wellsite onto and into land in the vicinity of the Waikaikai Stream	28/11/2005	2022
Pohutukawa-A	6751-1	To discharge emissions to air during flaring from well workovers and in emergency situations and miscellaneous emissions associated with production activities at the Pohutakawa-A wellsite	28/11/2005	2022

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 Rimu Production Station consisted of three 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 Rimu Production Station was visited four times during the monitoring period. An annual inspection of the associated wellsites was also undertaken. With regard to consents for the discharge to water, the main points of interest were plant processes with potential or actual discharges to receiving watercourses, including contaminated stormwater and process wastewaters. Air inspections focused on plant processes with associated actual and potential emission sources and characteristics, including potential odour, dust, noxious or offensive emissions. Sources of data being collected by the Company were identified and accessed, so that performance in respect of operation, internal monitoring, and supervision could be reviewed by the Council. The neighbourhood was surveyed for environmental effects.

1.4.4 Chemical sampling

The Council undertook sampling of both the discharge from the site and the water quality upstream and downstream of the discharge point and mixing zone. The production station discharge was sampled on one

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occasion, and the sample analysed for chloride, hydrocarbons, conductivity, pH and suspended solids. The unnamed tributary of the Manawapou River was sampled upstream and downstream of the discharge on one occasion, and the samples analysed for the same constituents.

The Council undertook sampling of the ambient air quality outside the boundary of the site. A multi-gas meter was deployed on one occasion in the vicinity of the plant, with monitoring consisting of continuous measurements of gas concentrations for the gases of interest (carbon monoxide and combustible gases). A PM₁₀ particulate monitor was deployed concurrently with the multi-gas meter. Two nitrogen oxide measuring devices were also deployed in the vicinity of the plant on one occasion during the year under review.

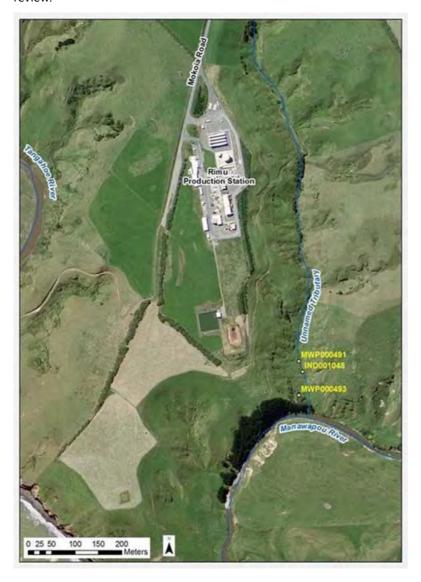


Figure 1 Location of the Rimu Production Station and associated sampling sites

2 Results

2.1 Water

2.1.1 Inspections

Four inspections of the Rimu Production Station were undertaken during the 2019-2020 monitoring period, on 5 September and 16 October 2019, and 1 May and 25 June 2020. An inspection of each of the associated wellsites was conducted over two days, on 13 and 14 December 2019. The following was found during inspections:

5 September 2019

It was noted that a hydrocarbon sock within the oily water separator was coated with black hydrocarbon and this may have been due to a recent spill onto site that resulted in hydrocarbon being flushed into the separator and then removed. The separator itself was free of hydrocarbons.

Works to contour an area of road at the western end of the site to improve the containment of stormwater onsite and direct it for treatment prior to discharging offsite had been completed. All systems appeared to be operating as per normal and no issues were raised during the inspection.

Flaring of gas is minimised through onsite processes with the gas utilised to power onsite equipment or for export. It was noted that the flare pit is not lined with an impervious liner. The flare was clean burning with no smoke visible.

16 October 2019

Both the oily water separator and fire water pond were inspected and found to be in good working order. The hydrocarbon sock that is usually located within the oily water separator was noted as absent. The separator itself was free of hydrocarbons.

13 and 14 December 2019

An annual inspection of the well sites associated with the Rimu Production Station was carried out to check for compliance with resource consent conditions. Well sites inspected were Kauri-A, C, D, E, F; Rimu-A; Manutahi-A, B, C, D, G; and Pohutukawa-A. Rimu-B was not visited.

In general, the sites were tidy and clean with minimal activity occurring. It was noted however that there appeared to be an increase in the amount of staining onsite, particularly around the wellheads and cellars. It also appeared that the cellars for some wells were being used to store and contain hydrocarbon, rather than using drip trays and drums. Some of the sites were being used to store equipment, this was mostly inert in nature and spills/staining was not evident. The sites were being maintained with weed spraying evident on the site and in some places within the ring drains. The majority of ring drains were not vegetated.

Hydrocarbon sheens were not observed within the skimmer pits or in puddles on all but two of the sites. The skimmer pits were all in good order with goose neck pipes functioning as required. Some of the wellsites are not active and haven't been for many years. These sites have unlined skimmer pits and generally only one. Due to the nature of the sandy soils the pits were mostly dry at the time of inspection. The majority of the discharge paths would be on to land before flowing to surface water should they discharge. No effects were noted in the grass (such as burnt patches or dead grass) or within the streams.

Flaring from the sites was not occurring at any of the sites during inspections and no visual effects were noted as a result of previous flaring on the sites.

Specific points to note and if applicable, action, were:

Kauri-A: The contaminated gravel from a hydrocarbon spill (underground containment overflow) had been removed and replaced with new metal. A hole in the corner of the site had been filled in, and the contaminated area had been shaped so any build-up of water was directed to the skimmer pit. The area around the skimmer pit had been sprayed and the pipes exposed. The pit had been re-defined, and overgrown grasses had been removed.

Manutahi-D: This site was considered to be non-compliant due to the ring drains needing to be redefined to ensure stormwater is directed to the skimmer pits for treatment before discharging offsite. In particular these earthworks were required along the southern and western fence lines. It was also noted that culvert pipes were blocked with sand. This was observed earlier in the year, during the previous annual inspection round in winter, and the consent holder was planning on undertaking works to remedy this during the summer. There was scouring behind the skimmer pit below the discharge pipes that could potentially undermine the integrity of the pit. Sand that was being captured in the bunds was being placed back onto site, rather than being disposed of. The hose for the crude oil slops tank rests in a manner that allows hydrocarbons to drip onto the ground with no protection in place to prevent drips from falling and the area below the hose was stained and contained hydrocarbon.

Kauri-E: The ring drain was in need of redefining as some of the culverts were becoming blocked. An orange layer of sludge was noted in the ring drain. This appeared to be iron oxide that had discharged onto site from a neighbouring property. The pipe had since been disconnected. It was noted that a storage bund had sand in the base that smelled of hydrocarbon when disturbed. The consent holder was advised to remove this sand. It was possible that stormwater was discharging into the ground via a hole against a concrete foundation at the eastern end of the E1 wellhead liquids line and this required further investigation by WestSide.

Manutahi-B and Kauri-F: these sites were found to be non-compliant. On both sites hydrocarbons were found to be staining the ring drain. There was clear evidence that hydrocarbon had been pumped from a cellar to the ring drain, where it had then flowed to the skimmer pits. There was no tracking of hydrocarbon from the cellar to the ring drain. At the time of inspection the first skimmer pit at Kauri-F had been pumped out and the second pit was free of hydrocarbons. Both skimmer pits at Manutahi-B contained hydrocarbon, however it had also discharged offsite and was causing adverse effects (the landowner's grass was dying).

1 May 2020

Both the oily water separator and fire water pond were inspected and found to be in good working order. A hydrocarbon sock within the oily water separator was present. The separator contained hydrocarbons and staff intended to remove this using mats. All systems appeared to be operating as per normal and no issues were raised during the inspection.

Staff advised that the flaring of gas was currently minimal as wells were shut in. The flare was not visible and no smoke was observed.

25 June 2020

All systems appeared to be operating as per normal and no issues were raised during the inspection. The pilot flare was not visible, and no smoke was detected or observed.

2.1.2 Results of discharge monitoring

Two samples were collected of the stormwater discharge from the production station during the period under review. Table 3 presents the results from these samples. The location of the sampling site (IND001048) is shown in Figure 1 above.

Levels of chloride, hydrocarbons, suspended solids and pH complied with the limits prescribed by consent 5744-2.

Table 3 Results for Rimu Production Station stormwater discharge (site IND001048)

	Chloride g/m³	Conductivity mS/m@25°C	Hydrocarbons g/m³	рН	Suspended solids g/m³	Temperature Deg C
14 Nov 2019	18	10.2	< 0.7	7.0	18	15.6
18 June 2020	19	9.9	<0.7	7.5	26	11.9
Consent 5744-2 limits	230	-	15	6.0 – 9.0	100	-

2.1.3 Results of receiving environment monitoring

Chemical water quality sampling of the receiving waters of the unnamed tributary of the Manawapou River was undertaken in conjunction with the discharge monitoring on 14 November 2019 and 18 June 2020. The results are presented in Table 4. The sampling sites are shown in Figure 1.

The results indicate that the discharge was having negligible effect on the water quality of the tributary of the Manawapou River. Chloride below the mixing zone was above the 50 g/m³ specified in the consent on 18 June, however this was also exceeded in the upstream sample (57 g/m³). With a level of 19 g/m³ in the discharge, the high chloride levels found in the stream (consistently between 40-60 g/m³) are probably a result of wind-blown salt from the sea nearby.

Table 4 Results of receiving water sampling

		14 Noven	nber 2019	18 Jun	e 2020	Consent
Unit	Units	Upstream (MWP000491)	Downstream (MWP000493)	Upstream (MWP000491)	Downstream (MWP000493)	5744-2 limits
Chloride	g/m³	46	45	57	55	50
Conductivity @ 25°C	mS/m	31.6	31.1	33.0	31.4	-
Hydrocarbons	g/m³	< 0.7	< 0.7	< 0.7	< 0.7	-
рН	рН	7.9	7.9	7.1	7.0	-
Suspended solids	g/m³	42	39	184	210	-
Temperature	°C	14.9	14.9	12.2	12.2	< 2°C increase

2.2 Air

2.2.1 Inspections

Air inspections were carried out in conjunction with site inspections as discussed in section 2.1.1 above. No issues regarding air quality were noted during the monitoring period.

2.2.2 Results of receiving environment monitoring

2.2.2.1 Carbon monoxide and combustible gases

During the monitoring year, a multi-gas meter was deployed on one occasion in the vicinity of the plant. The deployment lasted approximately 86 hours, with the instrument placed in a down-wind position at the start of the deployment. Monitoring consisted of continuous measurements of gas concentrations for the gases of interest (carbon monoxide and combustible gases). The monitoring sites used in the year under review are shown in Figure 2.



Figure 2 Air monitoring sites at Rimu Production Station for 2019-2020

Because of the nature of the activities on the site, it was considered that the primary information of interest in respect of gases potentially emitted from the site was the average downwind concentration, rather than any instantaneous peak value. That is, the long-term exposure levels, rather than short-term maxima, are of most interest. The gas meter was therefore set up to create a data set based on recording the average concentration measured during each minute as raw data.

The details of the sample run are summarised in Table 5 and the data from the sample run are presented graphically in Figure 3.

Table 5 Results of carbon monoxide and LEL monitoring at Rimu Production Station

	Period	21 to 25 November 2019 (86 hours)
Max	CO(ppm)	3.70
Σ	LEL(%)	0.20
Mean	CO(ppm)	0.12
Σ	LEL(%)	0.00
Mi Ci	CO(ppm)	0.00
Σ	LEL(%)	0.00

Notes: (1) the instrument records in units of ppm. At 25°C and 1 atm, 1ppm CO = 1.145 mg/m³

(2) because the LEL of methane is equivalent to a mixture of approximately 5% methane in air, then the actual concentration of methane in air can be obtained by dividing the percentage LEL by 20.

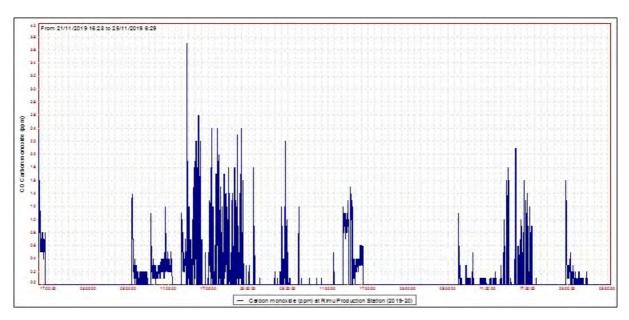


Figure 3 Ambient CO levels in the vicinity of Rimu Production Station

The consent covering air discharges from the Rimu Production Station has specific limits related to particular gases. Special condition 11 of consent 5746-2 sets limits on the carbon monoxide concentration at or beyond the production station's boundary. The limit is expressed as 10 mg/m³ for an eight hour average. The maximum concentration of carbon monoxide found during the monitoring run was 4.2 mg/m³ while the average concentration for the entire dataset was 0.14 mg/m³, which comply with consent conditions.

Lower Explosive Limit (LEL) gives the percentage of the lower explosive limit, expressed as methane that is detected in the air sampled. The sensor on the instrument reacts to gases and vapours such as acetone, benzene, butane, methane, propane, carbon monoxide, ethanol, and higher alkanes and alkenes, with varying degrees of sensitivity. The Council's Regional Air Quality Plan has a typical requirement that no discharge shall result in dangerous levels of airborne contaminants, including any risk of explosion. At no time did the level of explosive gases downwind of the Sidewinder Production Station reach any more than a trivial level.

2.2.2.2 PM₁₀ particulates

In September 2004 the Ministry for the Environment enacted National Environmental Standards (NESs) relating to certain air pollutants. The NES for PM_{10} particulates is $50 \mu g/m^3$ (24 hour average). The same limit is imposed on consent 5746-2, in condition 11 that provides for the discharge of emissions to air from Rimu Production Station.

Particulates can be derived from many sources, including motor vehicles (particularly diesel), solid and oil-burning processes for industry and power generation, incineration and waste burning, photochemical processes, and natural sources such as pollen, abrasion, and sea spray.

 PM_{10} particles are linked to adverse health effects that arise primarily from the ability of particles of this size to penetrate the defences of the human body and enter deep into the lungs, significantly reducing the exchange of gases across the lung walls. Health effects from inhaling PM_{10} include increased mortality and the aggravation of existing respiratory and cardiovascular conditions such as asthma and chronic pulmonary diseases.

During the reporting period, a "DustTrak" PM₁₀ monitor was deployed on one occasion in the vicinity of Rimu Production Station. The deployment lasted approximately 87 hours, with the instrument placed in a

down-wind position at the start of the deployment. Monitoring consisted of continual measurements of PM_{10} concentrations. The location of the "DustTrak" monitor during the sampling run is shown in Figure 2.

The results of the sample run are presented in Figure 4 and Table 6.

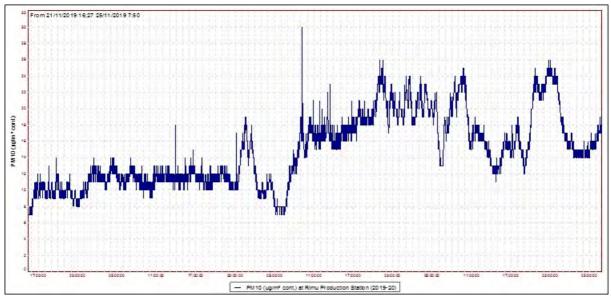


Figure 4 PM₁₀ concentrations (µg/m³) at Rimu Production Station

During the 87 hour run, from 21 to 25 November 2019, the average recorded PM_{10} concentration was 10.8 μ g/m³ for the first 24 hour period, 13.0 μ g/m³ for the second, 18.8 μ g/m³ for the third, and 17.6 μ g/m³ for the fourth 24 hour period. These daily means equate to 22%, 26%, 38% and 35%, respectively of the 50 μ g/m³ value that is set by the NES and consent 5746-2. Background levels of PM_{10} in the region have been found to be typically around 11 μ g/m³.

Table 6 Daily averages of PM₁₀ results from monitoring at Rimu Production Station

	21 to 25 November 2019 (87 hours)			
24 hr. set	Day 1	Day 2	Day 3	Day 4 (72h to end)
Daily average	10.8 μg/m³	13.0 μg/m³	18.8 μg/m³	17.6 μg/m³
NES	50 μg/m³			

2.2.2.3 Nitrogen oxides

From 2014 onwards, the Council implemented a coordinated region-wide compliance monitoring programme to measure nitrogen oxides (NOx). The programme involves deploying measuring devices at 30 NOx monitoring sites (including two sites in the vicinity of Rimu Production Station) on the same day, with retrieval three weeks later. This approach assists the Council in further evaluating the effects of local and regional emission sources and ambient air quality in the region.

The consents covering air discharges from the Rimu Production Station have specific limits related to particular gases. Special condition 11 of consent 5746-2 sets a limit on the nitrogen dioxide concentration at or beyond the production station's boundary. The limit is expressed as $200 \,\mu\text{g/m}^3$ for a one hour average exposure.

NOx passive adsorption discs were place at two locations in the vicinity of the Rimu Production Station on one occasion during the year under review. The discs were left in place for a period of 21 days. The calculated one hour theoretical maximum NOx concentrations found at Rimu Production Station during the

year under review equates to $11.5 \mu g/m^3$. The results show that the ambient ground level concentration of NOx is well below the limits set out by consent 5746-2.

2.2.3 Summary of flaring volumes reported by the Company

WestSide provided the Council with an annual report on flaring and emissions as required by consent 5746-2. Emission data for the Rimu Production Station were provided to the Council, expressed as total gas flared and total fuel gas over a one day period. Monthly summaries of these datasets are graphically presented in Figure 5.

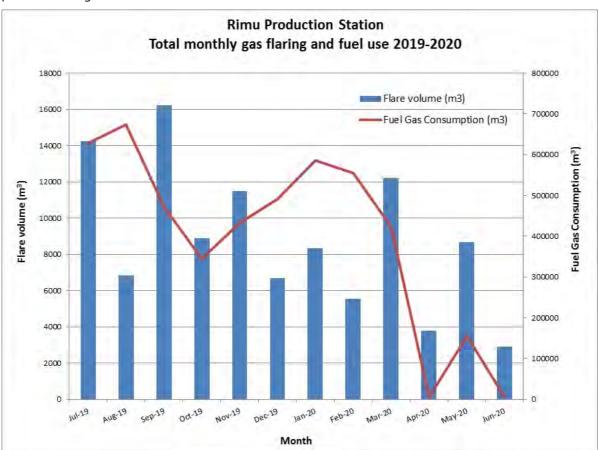


Figure 5 Monthly flare volumes for 2019-2020

Flaring events at the production station occurred intermittently. However, a pilot flare was maintained at all times for safety purposes, meaning a small amount of gas was continually flared.

The quantities flared each month varied depending on activity at the site, with increases due to events such as off-spec gas, pigging operations, issues with equipment, and plant shut-downs and restarts.

No complaints were received in relation to flaring or emissions to air at the Rimu Production Station during the reporting period.

2.3 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).

In the 2019-2020 period, the Council was not required to undertake significant additional investigations and interventions, or record incidents, in association with the Company's conditions in resource consents or provisions in Regional Plans.

3 Discussion

3.1 Discussion of site performance

Monitoring of the Rimu Production Station in the 2019-2020 period found that, in general, the site was tidy and well managed.

Some issues were noted at wellsites associated with the production station: Manutahi-B, Manutahi-D, Kauri-E, and Kauri-F.

3.2 Environmental effects of exercise of consents

The monitoring showed that the stormwater discharge was not having a significant adverse effect on the water quality of the unnamed tributary of the Manawapou River.

There were no adverse effects on the environment found as a result of the exercise of the air discharge consent. The ambient air quality monitoring at the site showed that levels of carbon monoxide, combustible gases, PM_{10} particulates, and nitrogen oxides were all below levels of concern at the time of sampling. No offensive or objectionable odours were detected beyond the boundary during inspections and there were no complaints in relation to air emissions from the site.

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 and 8.

Table 7 Summary of performance for consent 5744-2.0

Purpose: To discharge treated stormwater from the Rimu Production Station onto and into land and into an unnamed tributary of the Manawapou River				
	Condition requirement	Means of monitoring during period under review	Compliance achieved?	
1.	Adoption of best practicable option to minimise adverse effects	Site inspections	Yes	
2.	Limit on stormwater catchment area	Site inspections	Yes	
3.	Preparation of contingency plan	Up-to-date as of 24 August 2016	Yes	
4.	Design and maintenance of stormwater system in accordance with information supplied	Site inspections	Yes	
5.	All discharges to flow to perimeter drain and skimmer pit	Site inspections	Yes	
6.	Skimmer pit to have capacity of at least 3,600 m ³ and retain hydrocarbons	Site inspections	Yes	
7.	Skimmer pits and retention areas to be lined	Site inspections	Yes	
8.	Concentration limits upon potential contaminants in discharge	Water sampling	Yes	
9.	Limits on pH levels in skimmer pits and discharge	Water sampling	Yes	

Purpose: To discharge treated stormwater from the Rimu Production Station onto and into land and into an unnamed tributary of the Manawapou River

Condition requirement	Means of monitoring during period under review	Compliance achieved?
10. Effects not to occur in receiving waters beyond the established mixing zone	Water sampling	Yes
11. Effects not to occur in receiving waters beyond the established mixing zone	Water sampling and visual inspection	Yes
12. Notification prior to reinstatement of the site	Site in use	N/A
13. Optional review provision re environmental effects	N/A	
Overall assessment of consent compliance and this consent	High	
Overall assessment of administrative performan	High	

N/A = not applicable

Table 8 Summary of performance for consent 5746-2.0

	Purpose: To discharge contaminants into the air from the Rimu Production Station, including flaring and miscellaneous emissions				
	Condition requirement	Means of monitoring during period under review	Compliance achieved?		
1.	Adoption of best practicable option	Site inspections	Yes		
2.	Maintain log of all flaring incidents longer than 5 minutes	Information received	Yes		
3.	Provision of monthly flaring information	Information received	Yes		
4.	Annual report on flaring due August	Report received	Yes		
5.	Record of smoke emitting incidents to be provided on request	Not requested	N/A		
6.	Analysis of typical gas and/or condensate stream to be provided on request	Not requested	N/A		
7.	Notification to Council of alterations to plant equipment, processes or operations	Liaison with consent holder	Yes		
8.	Notification to Council of flaring expected to last more than 5 minutes	Notifications received	Yes		
9.	No offensive odour, dust or smoke beyond the site boundary	Site inspections	Yes		
10.	No noxious or toxic levels of airborne contaminants at or beyond the site boundary	Air monitoring	Yes		

Purpose: To discharge contaminants into the air from the Rimu Production Station, including flaring and miscellaneous emissions

Condition requirement	Means of monitoring during period under review	Compliance achieved?
11. Limit on maximum ground level concentration of carbon monoxide, nitrogen dioxide, PM ₁₀ and sulphur dioxide	Air monitoring	Yes
12. Limit on maximum ground level concentration of other contaminants	Not monitored during period under review	N/A
13. Optional review provision re environmental effects	Not scheduled for consideration during year under review. Next consideration June 2022	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		
Overall assessment of administrative performance in respect of this consent		High

N/A = not applicable

Table 9 Evaluation of environmental performance over time

Year	Consent no	High	Good	Improvement req	Poor
2016-17	5744-2	1			
	5746-2	1			
2017-18	5744-2	1			
	5746-2	1			
2018-19	5744-2		1		
	5746-2	1			
Totals		5	1	0	0

During the monitoring period, WestSide demonstrated a high level of both environmental performance and administrative compliance with the resource consents as defined in Section 1.1.4. .

3.4 Recommendations from the 2018-2019 Annual Report

In the 2018-2019 Annual Report, it was recommended:

- 1. THAT in the first instance, monitoring of consented activities at the Rimu Production Station in the 2019-2020 year be amended from that undertaken in 2018-2019, with a reduction in inspections from six to four.
- 2. THAT should there be issues with environmental or administrative performance in 2019-2020, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

Recommendation one was implemented, while it was not considered necessary to carry out additional investigations or interventions as per recommendation two.

3.5 Alterations to monitoring programmes for 2020-2021

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.

It is proposed that for 2020-2021 that the programme remains the same as that scheduled in 2019-2020.

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 2020-2021.

4 Recommendations

- 1. THAT in the first instance, monitoring of consented activities at the Rimu Production Station in the 2020-2021 year continue at the same level as in 2019-2020.
- 2. THAT should there be issues with environmental or administrative performance in 2020-2021, 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:

Bund A wall around a tank to contain its contents in the case of a leak.

Conductivity Conductivity, an indication of the level of dissolved salts in a sample, usually

measured at 25°C and expressed in mS/m.

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. m² Square Metres:

MfE Ministry for the Environment.

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.

mS/m Millisiemens per metre.

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).

pH 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.

Pigging Pigging is the practice of using devices known as pigs (or scrapers) to perform

various maintenance operations. This is done without stopping the flow of the product in the pipeline. These operations include, but are not limited to, cleaning

and inspecting the pipeline.

 PM_{10} Relatively fine airborne particles (less than 10 micrometre diameter).

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.

UI Unauthorised Incident.

For further information on analytical methods, contact a Science Services Manager.

Bibliography and references

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Appendix I

Resource consents held by WestSide New Zealand Limited

(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 Westside New Zealand Limited

Consent Holder: Level 17

300 Queen Street Brisbane QLD 4000

Australia

Decision Date: 1 November 2016

Commencement Date: 1 November 2016

Conditions of Consent

Consent Granted: To discharge treated stormwater from the Rimu Production

Station onto and into land and into an unnamed tributary of

the Manawapou River

Expiry Date: 1 June 2034

Review Date(s): June 2022, June 2028

Site Location: Rimu Production Station, Mokoia Road, Mokoia

(Property owner: M & PD Hawken)

Grid Reference (NZTM) 1715980E-5610439N

Catchment: Manawapou

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

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. Stormwater discharged shall be collected from a catchment area of no more than 6 Ha.
- 3. The consent holder shall maintain and regularly update a 'Contingency Plan' that details measures and procedures that will be undertaken to prevent, and to avoid environmental effects from, a spillage or any discharge of contaminants not authorised by this consent. The plan and any amended versions shall be provided to the Chief Executive of the Taranaki Regional Council.
- 4. Subject to the other conditions of this consent the design, management and maintenance of the stormwater system shall be undertaken in accordance with the information submitted in support of the application for this consent.
- 5. All discharges from the site, including from any containment pit or hydrocarbon combustion facility (e.g. flare pit, thermal oxidiser), shall flow to a perimeter drain and skimmer pit. Perimeter drains shall be designed, including by having a positive grade and low permeability, to ensure that runoff flows directly to a skimmer pit without ponding.
- 6. The skimmer pit system shall have a combined capacity of no less than 3600 m³ including a 'freeboard' of no less than 1000 m³, and be designed to retain any hydrocarbons that enter them.
- 7. All skimmer pits and any other stormwater retention areas shall be lined with an impervious material to prevent seepage through the bed and sidewalls, and the stormwater system shall be designed to prevent any discharge of contaminants from the site.
- 8. Subject to condition 9 the constituents in the discharge shall meet the standards shown in the following table.

<u>Constituent</u>	<u>Standard</u>
pH	Within the range 6.0 to 9.0
suspended solids	Concentration not greater than 100 gm ⁻³
total recoverable hydrocarbons	Concentration not greater than 15 gm ⁻³ (as determined by infrared spectroscopic technique)
chloride	Concentration not greater than 230 gm ⁻³

This condition shall apply before the entry of the treated stormwater into the receiving environment at a designated sampling point approved by the Chief Executive, Taranaki Regional Council.

Consent 5744-2.0

- 9. The pH may exceed 9.0 if the exceedance is a result photosynthetic activity within the skimmer pits, but in any case the discharge shall not result in the pH of the receiving water increasing by more than 0.5 pH units after allowing for a mixing zone of 25 metres.
- 10. After allowing for a mixing zone of 80 metres, the discharge shall not cause any of the following effects in the receiving water of the Manawapou River tributary:
 - a) an increase in the temperature of more than 2 degrees Celsius;
 - b) the filtered carbonaceous biochemical oxygen demand to exceed 2 gm⁻³; or
 - c) the chloride concentration to exceed 50 gm⁻³.
- 11. After allowing for a mixing zone of 80 metres, the discharge shall not give rise to any of the following effects in the receiving water of the Manawapou River 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.
- 12. The consent holder shall advise the Chief Executive, Taranaki Regional Council, in writing at least 48 hours prior to the reinstatement of the site and the reinstatement shall be carried out so as to minimise adverse effects on stormwater quality. Notification shall include the consent number and a brief description of the activity consented and be emailed to worknotification@trc.govt.nz.
- 13. 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 2022 and/or June 2028, 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.

For and on behalf of

Signed and transferred at Stratford on 1 November 2016

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 Westside New Zealand Limited

Consent Holder: Level 17

300 Queen Street Brisbane QLD 4000

Australia

Decision Date: 1 November 2016

Commencement Date: 1 November 2016

Conditions of Consent

Consent Granted: To discharge contaminants into the air from the Rimu

Production Station, including flaring and miscellaneous

emissions

Expiry Date: 1 June 2034

Review Date(s): June 2022, June 2028

Site Location: Rimu Production Station, Mokoia Road, Mokoia

(Property owner: M & PD Hawken)

Grid Reference (NZTM) 1715953E-5610123N

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

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

Exercise of consent

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 effects on the environment associated with the discharge of contaminants into the environment arising from the emissions to air from the flare.

Recording and submitting information

- 2. The consent holder shall keep and maintain a log of all continuous flaring incidents lasting longer than 5 minutes and any intermittent flaring lasting for an aggregate of 10 minutes or longer in any 60-minute period. The log shall contain the date, the start and finish times, 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 4. Flaring, under normal operation in the low pressure flare, of rich mono-ethylene glycol degasser vapour, condensate tank vapours, non-condensibles from tri-ethylene glycol/mono-ethylene glycol regeneration and purge gas shall be excluded from this requirement.
- 3. The consent holder shall supply to the Taranaki Regional Council each month a copy of flaring information comprising: the type and amount of material flared (including any gas used to maintain a pilot flame), the date this was flared, the reason why flaring was undertaken, and an indication of whether smoke was produced from such flaring events.
- 4. The consent holder shall provide to the Taranaki Regional Council during August of each year, for the duration of this consent, a report:
 - a) detailing gas combustion at the production station flare, including but not restricted to routine operational flaring and flaring logged in accordance with condition 2.
 - b) detailing any measures that have been undertaken by the consent holder to improve the energy efficiency of the production station;
 - c) detailing any measures to reduce smoke emissions;
 - d) detailing any measures to reduce flaring,
 - e) addressing any other issue relevant to the minimisation or mitigation of emissions from the production station flare; and
 - f) detailing any complaints received and any measures undertaken to address complaints.

5. The consent holder shall keep and make available to the Chief Executive, Taranaki Regional Council, upon request, a record of all smoke emitting incidents, noting time, duration and cause. The consent holder shall also keep, and make available to the Chief Executive, upon request, a record of all complaints received as a result of the exercise of this consent.

Information and notification

- 6. The consent holder shall make available to the Chief Executive, Taranaki Regional Council upon request, an analysis of a typical gas and/or condensate stream from the Manutahi, Kauri and Tariki Formations, covering sulphur compound content and the content of compounds containing six or more carbon atoms in their molecular structure.
- 7. Prior to undertaking any alterations to the plant equipment, processes or operations, which may substantially alter the nature or quantity of flare emissions other than as described in the consent application, the consent holder shall first consult with the Chief Executive, Taranaki Regional Council, and shall obtain any necessary approvals under the Resource Management Act 1991.
- 8. The consent holder shall notify the Chief Executive, Taranaki Regional Council, as soon as practicable, whenever the continuous flaring of hydrocarbons (other than the flaring of rich mono-ethylene glycol degasser vapour, condensate tank vapours, non-condensibles from tri-ethylene glycol/mono-ethylene glycol regeneration and purge gas) is expected to occur for more than five minutes in duration.

Preventing and minimising emissions

- 9. The discharges authorised by this consent shall not, whether alone or in conjunction with any other emissions from the site arising, give rise to any levels of odour or dust or smoke that are offensive or obnoxious or objectionable at or beyond the boundary of the site.
- 10. The consent holder shall not discharge any contaminant to air from the site at a rate or a quantity such that the contaminant, whether alone or in combination with other contaminants, is or is liable to be hazardous or toxic or noxious at or beyond the boundary of the site.
- 11. The consent holder shall control all emissions of carbon monoxide, nitrogen dioxide, fine particles (PM10) and sulphur dioxide to the atmosphere from the site, in order that the maximum ground level concentration of any of these contaminants arising from the exercise of this consent measured under ambient conditions does not exceed the relevant ambient air quality standard as set out in the Resource Management (National Environmental Standards for Air Quality Regulations, 2004) at or beyond the boundary of the property on which the wellsite is located.

- 12. The consent holder shall control discharges to the atmosphere from the flare of contaminants, other than those addressed by the *Resource Management (National Environmental Standards for Air Quality) Regulations, 2004,* whether alone or in conjunction with any other emissions from the site, in order that the maximum ground level concentration for any particular contaminant arising from the exercise of this consent, measured at or beyond the boundary of the site, is not increased above background levels:
 - a) by more than 1/30th of the relevant Workplace Exposure Standard-Time Weighted Average (exposure averaged over a duration as specified for the Workplace Exposure Standard-Time Weighted Average), or by more than 1/10th of the Workplace Exposure Standard-Short Term Exposure Limit over any short period of 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 the General Excursion Limit at any time (all terms as defined in Workplace Exposure Standards, 2002, Department of Labour or any subsequent reviews).

Advice Note:

In exercising this consent the consent holder must also comply with any discharge standard required by Regulations. At the time of issuing this consent the 'Resource Management (National Environmental Standards for Air Quality) Regulations, 2004' set limits on discharge of carbon monoxide, nitrogen dioxide, fine particles (PM₁₀) and sulphur dioxide.

Review

- 13. 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 2022 and/or June 2028, for the purposes of:
 - 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 or contaminants.

Signed and transferred at Stratford on 1 November 2016

For and on behalf of Taranaki Regional Council

A D McLay

Director - Resource Management