

**New Zealand Energy Corporation (NZEC)  
Deep Well Injection  
Monitoring Programme  
Annual Report  
2023/24  
Technical Report 2024-47**





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## Executive summary

New Zealand Energy Corporation (the Company) and its subsidiaries operate the Tariki, Toko, Waihapa and Waitapu wellsites.

This report for the period July 2023 to June 2024 describes the monitoring programme implemented by Taranaki Regional Council (the Council) in relation to the Company's deep well injection (DWI) activities. The report details the results of the monitoring undertaken, assesses the Company's environmental performance during the period under review and the environmental effects of their DWI activities.

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

The Company holds seven resource consents, which include a total of 103 conditions setting out the requirements that the Company must satisfy. Two of the seven consents were exercised during the reporting period.

The Council's monitoring programme for the year under review included five inspections, two injectate samples and fourteen groundwater samples collected for physicochemical analysis. The monitoring programme also included a significant data review component, with all injection data submitted by the Company assessed for compliance on receipt.

The monitoring showed that the Company's DWI activities were being carried out in compliance with the conditions of the applicable resource consents. There is no evidence of any issues with any injection well currently in use, or the ability of the receiving formation to accept injected fluids. The results of groundwater quality monitoring undertaken show no adverse effects of the activity on local groundwater resources. Inspections undertaken during the monitoring year found sites being operated in a professional manner.

For reference, in the 2023/24 year, consent holders were found to achieve a high level of environmental performance and compliance for 864 (89%) of a total of 967 consents monitored through the Taranaki tailored monitoring programmes, while for another 75 (8%) of the consents a good level of environmental performance and compliance was achieved. A further 26 (3%) of consents monitored required improvement in their performance, while the remaining two (<1%) achieved a rating of poor.

In terms of overall environmental and compliance performance by the Company over the last several years, this report shows that the Company's performance remains at a high level in the year under review.

This report includes recommendations for the 2024/25 year, including a recommendation relating to an optional review of consents 10086-1, 10708-1, 10763-1, 10809-1 and 10927-1 in June 2025.

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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 2023 to June 2024 by Taranaki Regional Council (the Council) on the monitoring programme associated with resource consents held by NZEC Waihapa Ltd, NZEC Tariki Ltd and Taranaki Ventures Ltd for deep well injection (DWI) activities. All three companies are subsidiaries of New Zealand Energy Corporation (the Company).

During the period under review, the Company held seven resource consents for the subsurface injection of fluids by DWI. The consents authorised discharges at the following wellsites:

- Waihapa-F near Bird Road, 6km south-east of Stratford,
- Waihapa-B, Waihapa-D, Waitapu and Copper Moki on Cheal Road, Ngaere,
- Toko-E wellsite near Standish Road, 5km east of Stratford, and
- Tariki-A wellsite on Mana Road, Ratapiko.

The resource consents held by the Company permit the discharge of a range of fluids by DWI, including produced water, contaminated stormwater, drilling fluids and hydraulic fracturing (HF) fluids. Consent 10809-1 also permits the discharge of compatible gas for temporary storage at the Tariki-A wellsite. The consents include a number of special conditions which set out specific requirements the Company must satisfy.

This report covers the results and findings of the monitoring programme implemented by the Council in respect of the DWI consents held by the Company. This is the 12<sup>th</sup> report to be prepared by the Council to cover the Company's DWI discharges and their effects.

### 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 *Resource Management Act 1991* (RMA) and the Council's obligations;
- the Council's approach to monitoring sites through annual programmes;
- the resource consents held by the Company for DWI activities;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted by the Company.

**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 2024/25 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 social-economic 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 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 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 2023/24 year, consent holders were found to achieve a high level of environmental performance and compliance for 864 (89%) of a total of 967 consents monitored through the Taranaki tailored monitoring programmes, while for another 75 (8%) of the consents a good level of environmental performance and compliance was achieved. A further 26 (3%) of consents monitored required improvement in their performance, while the remaining two (<1%) achieved a rating of poor. <sup>1</sup>

## 1.2 Process description

The process of DWI involves injecting fluids deep underground into geological formations which are confined from overlying groundwater aquifers by low permeability strata. Injection wells are also designed and constructed to provide multi barrier protection against contaminant migration to groundwater systems.

The subsurface injection of fluids by DWI is often used as a method for disposing of waste fluids generated during oil and gas exploration and production activities. The greatest volume of waste fluids generated

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<sup>1</sup> The Council has used these compliance grading criteria for more than 20 years. They align closely with the 4 compliance grades in the MfE Best Practice Guidelines for Compliance, Monitoring and Enforcement, 2018

through these activities is saline water (brine) that is drawn to the surface with hydrocarbons through producing wells ('produced water'). The DWI consents currently held by the Company also authorise the injection of fluid types other than produced water. The range of fluid types authorised for injection varies by consent, but includes contaminated stormwater, well drilling fluids, well workover fluids, HF fluids and HF return fluids.

In addition to providing a means to dispose of waste fluids, the subsurface injection of fluids by DWI is also an established oilfield technique for regulating reservoir pressure as a means of enhancing the rate of hydrocarbon recovery from a reservoir. This process, commonly referred to as water flooding, is often implemented when natural reservoir pressures become reduced due to ongoing production. Fluids can also be heated prior to injection to reduce the viscosity of the oil being produced, improving its flow toward a producing well and upward through the wellbore itself. More recently the deep well injection of excess gas for temporary storage has also become a more common and practicable use of compatible depleted oil and gas bearing formations.

The Company has two water flooding programmes, undertaken at the Waitapu and Copper Moki wellsites under consent 10086-1 and 10927-1 respectively, to enhance oil production from its Copper Moki oil and gas field. The Company also hold a consent (10809-1) that authorises injection of gas at the Tariki-A wellsite for temporary storage. All other consents are utilised for the disposal of the various forms of wastewater they authorise. A schematic representation of injection wells for both waste discharge and enhanced oil recovery is presented in Figure 1.

Further details regarding hydrocarbon exploration and production in Taranaki, the DWI process and its history within region can be found in previous compliance reports published by the Council (see Bibliography).

### 1.3 Resource consents

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.

The Company holds seven resource consents the details of which are summarised in Table 1 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. Two of the consents (10763-1 and 10809-1) are still to be exercised.

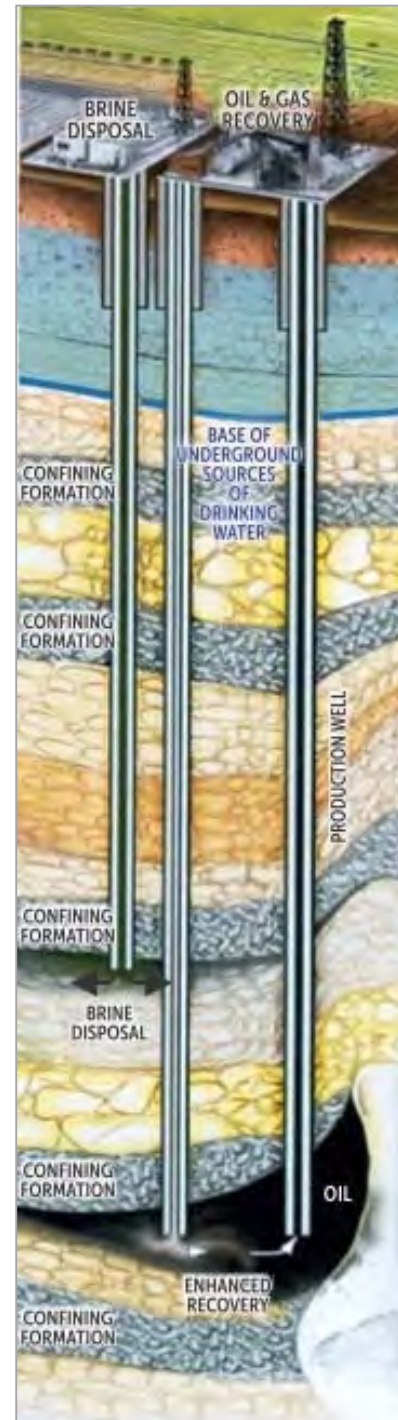


Figure 1 DWI schematic  
([www.epa.gov/uic](http://www.epa.gov/uic))



Figure 2 Location of the DWI consents held by the Company during the period under review

Table 1 Resource consents held by the Company during the 2023/24 monitoring year

Consent number	Purpose	Granted	Review	Expires
<i>Discharges of waste to land</i>				
3688-2	To discharge waste drilling fluids, produced water, hydraulic fracturing fluids, including return fluids, and stormwater from hydrocarbon exploration and production operations by deep well injection at the Waihapa-D wellsite.	23 Jun 2003	June 2028	01 Jun 2034
4094-2	To discharge produced water, contaminated stormwater, water based drilling fluids and hydraulic fracturing fluids, including return fluids, by deep well injection into the Matemateaonga Formation at the Waihapa-F wellsite.	10 Sep 2010	None remaining	01 Jun 2028
10086-1	To discharge produced water generated by hydrocarbon exploration and production operations by deep well injection for water flooding purposes at the Waitapu wellsite.	31 Mar 2015	June annually	01 Jun 2034
10708-1	To discharge produced water, well drilling fluids, well work over fluids, hydraulic fracturing fluids, and contaminated stormwater from hydrocarbon exploration and production operations into the Tikorangi Limestone by deep well injection at the Toko-E wellsite.	29 Jan 2019	June annually	01 Jun 2034
10763-1	To discharge produced water, well drilling fluids, well work over fluids, hydraulic fracturing fluids and contaminated stormwater from hydrocarbon exploration and production operations by deep well injection at the Waihapa-B wellsite.	10 Sep 2019	June annually	01 Jun 2034
10809-1	To discharge produced water from hydrocarbon exploration and production operations and gas, into the Tariki Sandstone member of the Otaraoa formation by deep well injection at the Tariki-A wellsite.	5 Feb 2020	June annually	01 Jun 2029
10927-1	To discharge produced water, well drilling fluids, well workover fluids and contaminated stormwater via deep well injection into the Mt Messenger Formation at the Copper Moki wellsite, at depths below 1,400mTVDSS for the purpose of water flooding.	07 Jul 2021	June annually	01 Jun 2040

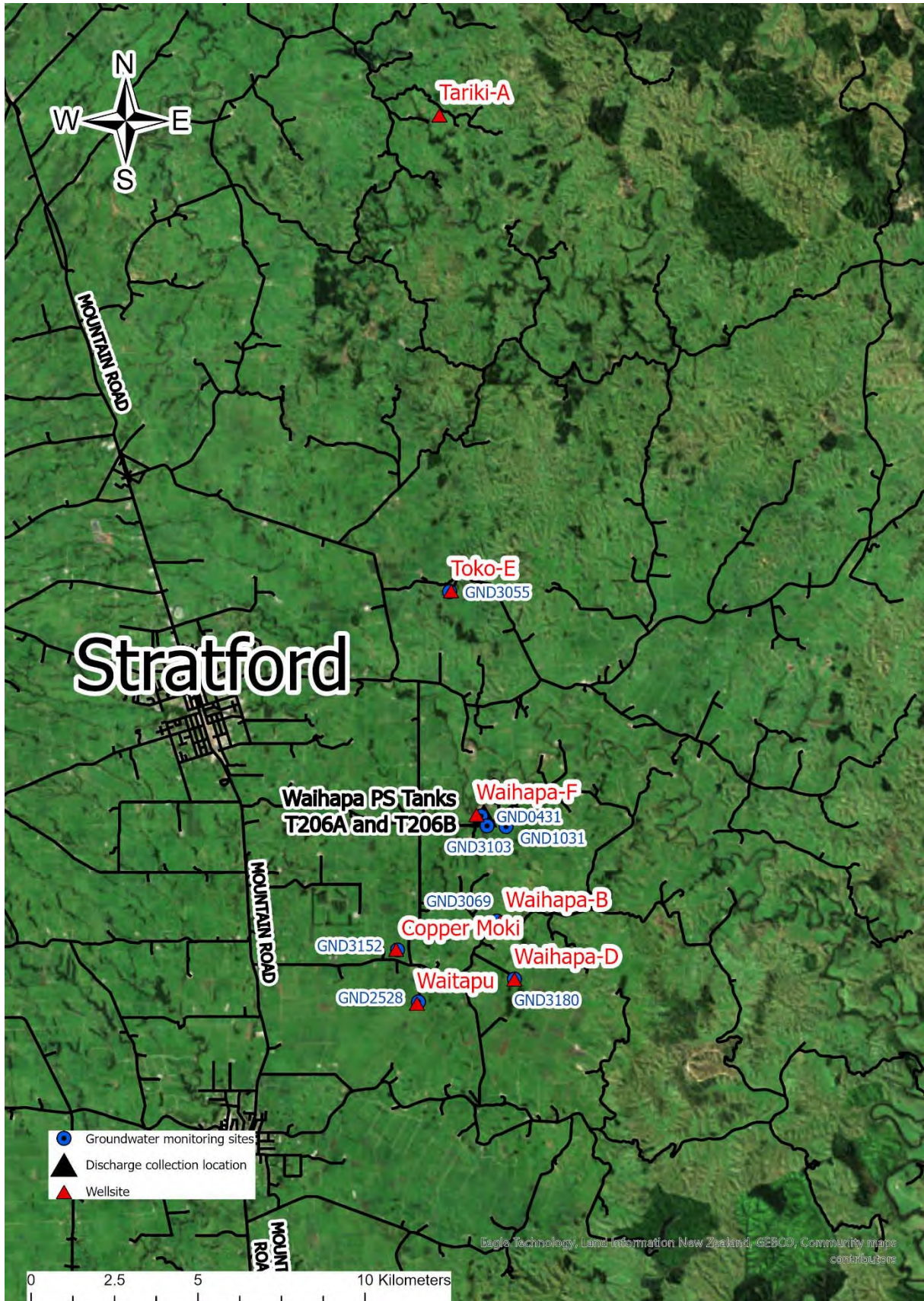


Figure 3 Location of monitoring sites in relation to the Company's DWI wellsites

## 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 Company's DWI sites consisted of five 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 Company's Waihapa-B, D and F, Waitapu, Toko-E, Tariki-A, and Copper Moki wellsites were all inspected on 8 August 2023 in relation to the Company's DWI monitoring programme. The main points of interest with regard to DWI consents are general housekeeping and any processes with potential or actual discharges, including any surface water runoff, and their receiving environments.

In addition to the programmed DWI inspections, Council Officers also visited the Company's Waihapa Production Station (WPS) on two occasions for injectate sampling purposes, and on one further occasion as part of the Company's Production Station monitoring programme.

### 1.4.4 Injectate sampling

Injectate samples were obtained for analysis on two occasions from the WPS during the monitoring period. The sampling of injectate is carried out in order to characterise the general chemical nature of the discharge and also the variation in its chemical composition across the monitoring period.

There are nine wells available for the injection of fluids for the purpose of water flooding and disposal at the Company's DWI wellsites. A summary of the details for each injection well is included in Table 2 and locations are displayed in Figure 3.

Injectate samples were collected from the bulk storage tanks at the WPS, identified on-site as tank T206A and T206B. The injectate samples were analysed by Hill Laboratories Ltd (Hills) for the following parameters:

- pH;
- conductivity;
- suspended solids;
- chlorides; and

- total petroleum hydrocarbons.

Table 2 Injection well details

Wellsite	Consent	Injection well	TRC bore id	Formation
Waihapa-D	3688-2	Waihapa-5	GND1752	Tikorangi limestone
Waihapa-F	4094-2	Waihapa-7A	GND1684	Matemateaonga
Waitapu	10086-1	Waitapu 2	GND2529	Mount Messenger
Toko-E	10708-1	Toko-2B	GND1605	Tikorangi limestone
Waihapa-B	10763-1	Waihapa-2	GND1627	Kiore and Mount Messenger
		Waihapa-8	GND1635	
Tariki-A	10809-1	Tariki-1A	GND1568	Otaraoa
		Tariki-4A	GND1575	
Copper Moki	10927-1	Copper Moki-3	GND3251	Mount Messenger

### 1.4.5 Groundwater sampling

Groundwater samples in relation to the DWI monitoring programme were obtained on two occasions for each site during the monitoring period. This sampling is a continuation of the groundwater monitoring component of this programme which was initiated during the 2012/13 monitoring period.

The programme consists of sampling two groundwater monitoring bores in the vicinity of the Waihapa-F wellsite and one monitoring bore each in the vicinity of the Waitapu, Waihapa-B, Toko-E and Copper Moki wellsites.

GND3103 was added to the programme in 2021 to replace GND0431, which had collapsed. A new groundwater monitoring bore has now been installed at Waihapa-D wellsite and monitoring began in August 2022.

Groundwater samples are collected following standard groundwater sampling methodologies and generally in accordance with the National Environmental Monitoring Standards (NEMS) for discrete groundwater quality sampling (2019).

Details of the groundwater monitoring sites included in the current monitoring programme are listed below in Table 3. The location of the groundwater sites in relation to the wellsite being monitored are illustrated in Figure 3.

Table 3 Groundwater monitoring site details

Site code	Wellsite	Distance from wellsite (m)	Screened/open depth (m)	Drilled depth (m)	Aquifer
GND1031	Waihapa-F	730	220-303	303.8	Matemateaonga
GND0431	Waihapa-F	110	unknown	96.3	Matemateaonga*
GND3103	Waihapa-F	260	unknown	unknown	Volcanics**
GND2528	Waitapu	<50	38-50	50.3	Volcanics
GND3055	Toko-E	<50	9.7-18.7	18.7	Volcanics
GND3069	Waihapa-B	<50	12-18	18.0	Volcanics
GND3152	Copper Moki	<50	23-41	41	Matemateaonga
GND3180	Waihapa-D	<50	11-17	17.3	Volcanics

\*well not sampled in 2021/22 monitoring period.

\*\*low pH readings indicate this bore may be screened in the volcanic formation.



Groundwater samples taken by the Council were sent on behalf of the Company to Hills and analysed for a range of parameters including the following:

- pH;
- conductivity;
- chlorides; and
- total petroleum hydrocarbons.

The parameters above are deemed sufficient to enable identification of any significant changes in groundwater quality related to DWI activities.

In addition to the routine sampling, baseline samples have been collected from all monitored sites and analysed by Hills for general ion chemistry, BTEX and dissolved gas concentrations. These more detailed analyses will allow for a more in depth assessment of variations in groundwater composition should the need arise in the future.

#### **1.4.6 Assessment of data submitted by the Company**

A significant component of the monitoring programme is the assessment of consent holder submitted data. The Company is required to submit a wide range of data under the conditions of their DWI consents.

As required by the conditions of their consents, the Company has submitted an Injection Operation Management Plan for each active injection well. The plans are required to include the operational details of the injection activities and to identify the conditions that would trigger concerns about the integrity of the injection well, the receiving formation or overlying geological seals. The plans are also required to detail the action(s) to be taken by the consent holder if trigger conditions are reached. The Company was also required to submit well construction details, an assessment of the local geological environment, results of well integrity testing and details of the proposed monitoring plan for the injection well.

The Company is also required to maintain continuous records of injection volumes, and average and maximum injection pressures, and to characterise the chemical characteristics of all waste types being discharged. This data is submitted to the Council on a monthly basis where it is assessed for compliance against the relevant consent conditions.

## 2. Results

### 2.1 Water

#### 2.1.1 Inspections

The routine inspections undertaken at each active wellsite during the monitoring year, included undertaking a general visual assessment of the operational equipment, storage facilities and associated equipment. The inspecting officer concluded that the wellsites were in good condition and being well managed.

Additional inspections were also undertaken during the monitoring year, for the purpose of injectate sampling and as part of the Company's production station monitoring programme. No issues were noted by staff during these visits.

### 2.2 Injectate monitoring

Samples of injectate were obtained from the Company's storage tanks at the WPS on 24 November 2023 and 30 May 2024. The samples were sent to Hills on the same day for physicochemical analysis. Injectate samples are generally a composite of wastewater from the Company's wellsites, third party wellsites and other production facilities.

During the 2023/24 monitoring period injectate stored in the WPS bulk storage tanks (T206A and T206B) was made up of a mixture of the Company's produced fluids, waste drilling fluids and contaminated stormwater and third party fluids from the Ahuroa gas storage facility, Kupe production station and Greymouth Petroleum wellsites. The results of the sample analyses undertaken by the Council are included below in Table 4. The range of results for each analyte since sampling commenced is also presented for comparison.

The Company is also required by consent conditions to undertake additional injectate sampling on each waste stream arriving on-site for discharge. A summary of the results from the Company's sampling programme are presented in Table 5. The concentrations of each analyte measured over the 2032-2024 period are within the typical range for injectate samples at these sites.

Table 4 Results of injectate sampling undertaken by the Council

Parameter	Unit	Minimum	Maximum	TRC2315062	TRC2418240
Date	-	July 2003 - June 2024		24-Nov-23	30-May-2024
Time	NZST	-	-	11:40	9:45
pH	pH Units	6.0	9.0	5.5	6.5
Alkalinity	g/m <sup>3</sup> CaCO <sub>3</sub>	162	10,100	1,140	510
Electrical conductivity	mS/m	471	4,190	1,366	311
Chloride	g/m <sup>3</sup>	1,400	69,200	3,900	600
Total petroleum hydrocarbons	g/m <sup>3</sup>	11	4,600	92	89
Suspended Solids	g/m <sup>3</sup>	3	360	83	63
Temperature	°C	20	47	-	-

Table 5 Results of the Company's monthly injectate sampling (2023/24)

Parameter	Unit	Minimum	Maximum
pH	pH units	6.5	7.5
Conductivity	µS/cm	52	4,480
Suspended Solids	g/m <sup>3</sup>	2	410
Temperature	°C	16.8	20
Salinity	ppt	0.3	777
Chloride	mg/L	3	17,800
Hydrocarbons	ppm	29.1	1,542

## 2.3 Groundwater sampling

Groundwater samples were obtained from two sites located in the vicinity of the Waihapa-F wellsite (GND1031 and GND3103) and one site each in the vicinity of the Waitapu wellsite (GND2528), the Waihapa-D wellsite (GND3180), the Copper Moki wellsite (GND3152), the Toko-E wellsite (GND3055) and the Waihapa-B wellsite (GND3069). Routine groundwater sampling was undertaken during November 2023 and May 2024.

No samples were collected from GND0431 during the monitoring period as this bore has become heavily laden with silt and has likely collapsed at depth. GND3103 which is a nearby farm bore has now replaced GND0431 in the monitoring programme. Water quality between the two sites differs slightly which is likely a result of depth and/or location. Historical concentrations from GND0431 have been reported in previous monitoring years and will not be included during this monitoring period.

The results of analyses carried out during the monitoring period compared to historical concentrations are set out below in Tables 6 to 11.

The results show there have been no significant changes in groundwater composition in the vicinity of any monitored wellsite. This is demonstrated by the relatively narrow ranges between minimum and maximum analyte concentrations recorded since monitoring commenced. The subtle variation in analyte concentrations at each site are a result of natural seasonal fluctuation and sampling variability.

Table 6 Results of Waitapu wellsite groundwater sampling at GND2528 (consent 10086-1)

Parameter	Unit	Minimum	Maximum	TRC2315059	TRC2312109
Date	-	July 2015-June 2024		27-Nov-23	08-May-24
Time	NZST	-	-	10:23	11:20
pH	pH	7.0	7.7	7.3	7.7
Temperature	°C	13.3	16.5	-	-
Electrical conductivity	µS/cm@25°C	460	524	474	482
Chloride	g/m <sup>3</sup>	11.5	14.2	12.4	13.9
Total petroleum hydrocarbons	g/m <sup>3</sup>	<0.5	<0.7	<0.7	<0.7

Table 7 Results of Waihapa-F wellsite groundwater sampling at GND1031 (consent 4094-2)

Parameter	Unit	Minimum	Maximum	TRC2315060	TRC2418238
Date	-	July 2012-June 2024		27-Nov-23	08-May-24
Time	NZST	-	-	9:29	10:21
pH	pH	6.5	8.3	8.1	8.3
Temperature	oC	15.1	18.4	-	-
Electrical conductivity	$\mu\text{S}/\text{cm}@25^\circ\text{C}$	156	433	365	371
Chloride	$\text{g}/\text{m}^3$	10.6	13.1	10.6	12
Total petroleum hydrocarbons	$\text{g}/\text{m}^3$	<0.5	<0.7	<0.7	<0.7

Table 8 Results of Waihapa-F wellsite groundwater sampling at 3103 (consent 4094-2)

Parameter	Unit	Minimum	Maximum	TRC2315061	TRC2418238
Date	-	May 2021 -June 2024		27-Nov-23	08-May-24
Time	NZST	-	-	9:04	9:50
pH	pH	6.4	8.4	6.5	8.4
Temperature	oC	13.8	14.8	-	-
Electrical conductivity	$\mu\text{S}/\text{cm}@25^\circ\text{C}$	154	372	154	372
Chloride	$\text{g}/\text{m}^3$	10.1	16.1	10.1	12
Total petroleum hydrocarbons	$\text{g}/\text{m}^3$	<0.7	<0.7	<0.7	<0.7

Table 9 Results of Toko-E wellsite groundwater sampling at GND3055 (consent 10708-1)

Parameter	Unit	Minimum	Maximum	TRC2315058	TRC2418236
Date	-	July 2018-June 2024		27-Nov-23	08-May-24
Time	NZST	-	-	11:32	12:24
pH	pH	7.9	8.3	8.1	8.3
Temperature	oC	13.6	15.1	-	-
Electrical conductivity	$\mu\text{S}/\text{cm}@25^\circ\text{C}$	294	309	300	309
Chloride	$\text{g}/\text{m}^3$	9.1	10.2	9.4	9.7
Total petroleum hydrocarbons	$\text{g}/\text{m}^3$	<0.7	<0.7	<0.7	<0.7

Table 10 Results of Waihapa-B wellsite groundwater sampling at GND3069 (consent 10763-1)

Parameter	Unit	Minimum	Maximum	TRC2315063	TRC2418241
Date	-	July 2019-June 2024		24-Nov-23	30-May-24
Time	NZST	-	-	11:10	13:20
pH	pH	6.1	6.4	6.2	6.2
Temperature	oC	14.3	15.7	-	-
Electrical conductivity	$\mu\text{S}/\text{cm}@25^\circ\text{C}$	276	383	276	279
Chloride	$\text{g}/\text{m}^3$	26	66	26	27
Total hydrocarbons	$\text{g}/\text{m}^3$	<0.7	<0.7	<0.7	<0.7

Table 11 Results of Waihapa-D wellsite groundwater sampling at GND3180 (consent 3688-2)

Parameter	Unit	Minimum	Maximum	TRC2315065	TRC2418243
Date	-	August 2022-June 2024		24-Nov-23	30-May-24
Time	NZST	-	-	10:20	12:20
pH	pH	6.7	69	6.7	6.7
Temperature	°C	14.3	15.7	-	-
Electrical conductivity	µS/cm@25°C	216	411	411	283
Chloride	g/m <sup>3</sup>	42	96	96	56
Total hydrocarbons	g/m <sup>3</sup>	<0.7	<0.7	<0.7	<0.7

## 2.4 Provision of consent holder data

The Company provided records of their injection activities during the 2023/24 monitoring period, including daily injection volumes, pumping duration and maximum and average injection pressures. All required data was provided within the consented timeframes.

Table 12 provides an overview of the Company's injection activities across all consents during the monitoring period. The total volume of fluid injected by the Company over the monitoring period was significantly less than the previous year (Table 13). The greatest volume of fluid (98.8%) was injected via the Toko-2B well located at the Toko-E wellsite.

Table 12 Summary of injection activity during the 2023/24 monitoring year

Consent	Wellsite	Injection well	Total volume discharged (m <sup>3</sup> ) 01/07/23-30/06/24	Discharge period		Well ID
				From	To	
3688-2	Waihapa-D	Waihapa-5	318.5	01/07/2023	03/08/2023	GND1752
4094-2	Waihapa-F	Waihapa-7A	-	-	-	GND1684
10086-1	Waitapu	Waitapu-2	-	-	-	GND2529
10708-1	Toko-E	Toko-2B	27,586.49	01/07/2023	30/06/2024	GND1605
10763-1	Waihapa-B	-	-	Injection has not yet commenced		
10809-1	Tariki-A	-	-			
10927-1	Copper Moki	Copper Moki-3	-	-	-	GND3251
Total			27,904.99	-	-	-

Table 13 Summary of the Company's historical injection activity by year

Period	Total volume discharged (m <sup>3</sup> )	Period	Total volume discharged (m <sup>3</sup> )
2023/24	27,904.99	2017/2018	351,516
2022/23	209,386	2016/2017	349,661
2021/22	58,683	2015/2016	205,245
2020/21	18,268	2014/2015	208,077
2019/20	188,453	2013/2014	104,967
2018/19	272,722		

### 2.4.1 Summary of injection at the Waihapa-D wellsite (consent 3688-2)

There was minimal injection of waste drilling fluid, stormwater and produced water undertaken under consent 3688-2 at the Waihapa-D wellsite during the monitoring period. A summary of historical injection undertaken via the wellsite since 2018 is included in Table 14 and presented graphically in Figure 4. The historical data indicates that pressures fluctuate in response to volume.

Table 14 Summary of injection at the Waihapa-D wellsite under consent 3688-2 (2018-2024)

Period	Annual volume (m <sup>3</sup> )	Max. injection volume (m <sup>3</sup> /day)	Max. injection rate (m <sup>3</sup> /hr)*	Max. injection pressure (bar)	Avg. injection pressure (bar)
2023/24	318.5	125	40.4	88	65
2022/23	18,180.88	194	73	80	20
2021/22	3,660	193 3659.57	33	0	0**
2020/21	277	53	11	0	0**
2019/20	No injection during the monitoring period				
2018/19	208,768	1,549	67	85	30

\* calculated using daily volume and hours \*\* well is operating as a vacuum

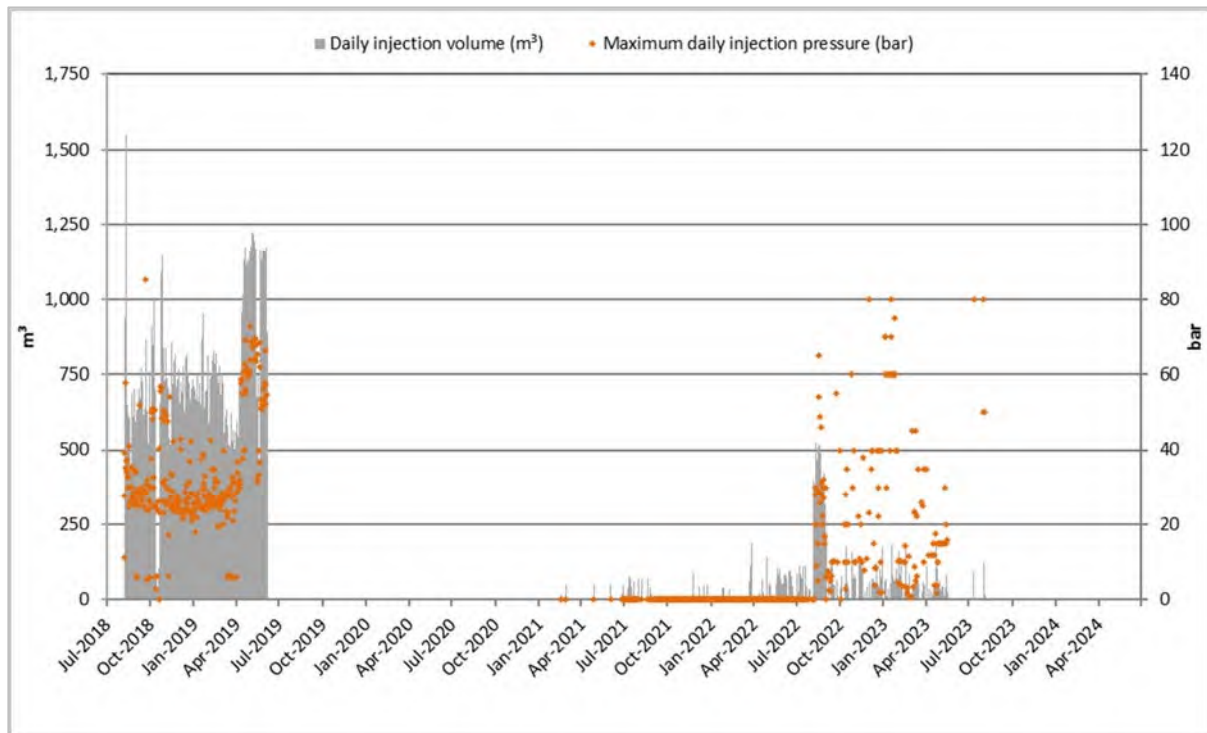


Figure 4 Waihapa-5 well: Daily injection volumes and injection pressures (2018-2024)

## 2.4.2 Summary of injection activities at the Waihapa-F wellsite (consent 4094-2)

Injection via the Waihapa-7A well ceased on 6 August 2018 and no further injection is planned. The well is currently shut-in awaiting plugging and abandonment.

## 2.4.3 Summary of injection at the Waitapu wellsite (consent 10086-1)

The injection of fluids at the Waitapu wellsite is via the Waitapu-2 well. Injection via the well commenced during the 2015/16 monitoring period. The injection of fluids in the Waitapu-2 well is designed to regulate pressure within the target formation as part of the Copper Moki oil and gas field water flood programme. Since injection commenced from the wellsite, the volumes of fluid discharged have fluctuated in response to the requirements of the programme. A summary of the historical injection data for the well is included in Table 15 and presented graphically in Figure 5 below.

During the period under review, no fluid injection was undertaken via the well.

Table 15 Summary of injection at the Waitapu wellsite under consent 10086-1 (2016-2024)

Period	Annual volume (m <sup>3</sup> )	Max. injection volume (m <sup>3</sup> /day)	Max. injection rate* (m <sup>3</sup> /hr)	Max. injection pressure (psi/bar)	Avg. injection pressure (bar)
Consent limit	-	-	-	689/48	-
2023/24	No injection during monitoring period				
2022/23	3501.6	43.5	-	681/47	20.8
2021/22	7,824.9	46.7	2.3	681/47	33.2
2020/21	10,756	62	3.6	681/47	26.3
2019/20	13,691	84	3.5	667/46	15.6
2018/19	9,468	63	5.0	696/48	34.8
2017/18	8,712	63	-	696/48	11.3
2016/17	20,266	104	-	653/45	16.2
2015/16	10,636	105	-	218/15	7.3

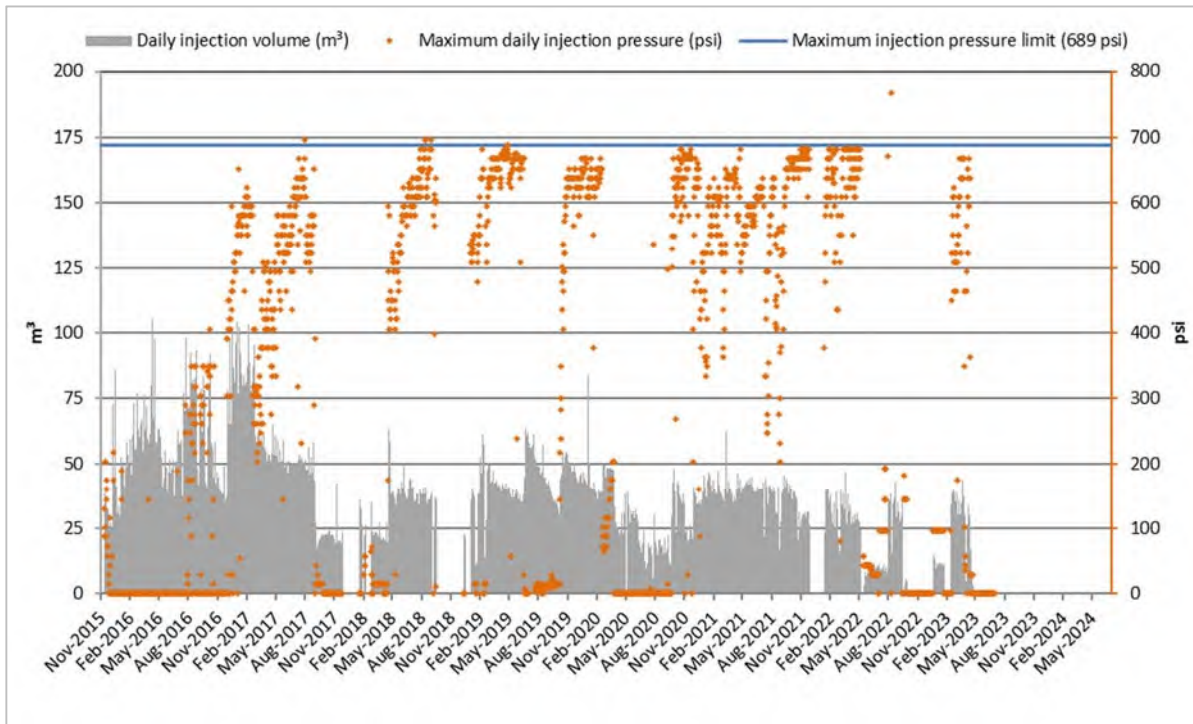


Figure 5 Waitapu-2 well: Daily injection volumes and injection pressures (2015-2024)

#### 2.4.4 Summary of injection at the Toko-E wellsite (consent 10708-1)

The injection of fluids at the Toko-E wellsite during the review period was undertaken via the Toko-2B well, under consent 10708-1. Injection commenced at the wellsite in June 2018. During the period under review, the volume and frequency of injection via the well were sporadic. The volume of fluid injected during the monitoring period was significantly less than during the previous year with the Toko-E wellsite receiving and injecting 98.8% of the company's DWI fluids.

Pressures within the well fluctuate in response to injection with the occasional peaks in pressures generally corresponding with higher volumes injected.

A summary of the historical injection data for the well is included in Table 16 and presented graphically in Figure 6 and Figure 7 below.

Table 16 Summary of injection at the Toko-E wellsite under consent 10708-1 (2018-2024)

Period	Annual volume (m <sup>3</sup> )	Max. injection volume (m <sup>3</sup> /day)	Max. injection rate* (m <sup>3</sup> /hr)	Max. injection pressure (bar)	Avg. injection pressure (bar)
2023/24	27,586.49	692.06	-	88	5.7
2022/23	187,703.8	1000.8	-	60.2	7
2021/22	45,046	573.9	80.2	80.1	7.5
2020/21	7,234	227	635	53	4
2019/20	174,762	1,396	393	82	3
2018/19	28,120	1,200	50	23	12

Note \* calculated using daily volume and hours

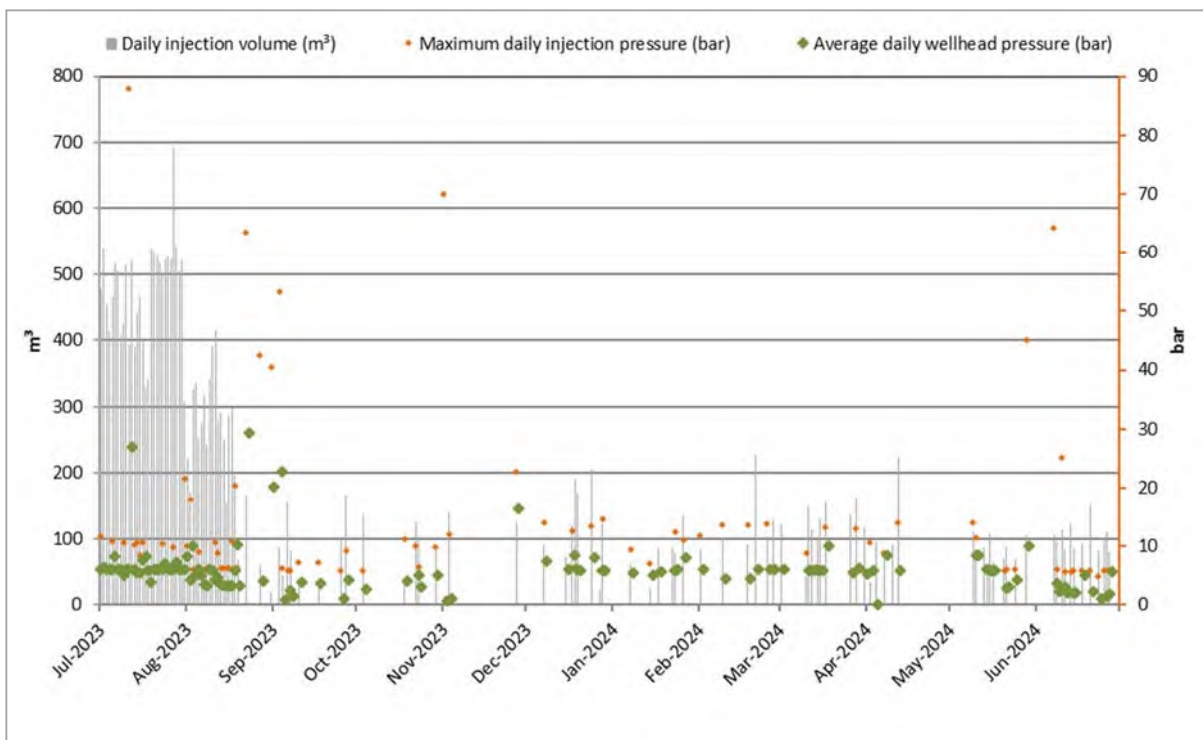


Figure 6 Toko-2B well: Daily injection volumes and injection pressures (2023/24)



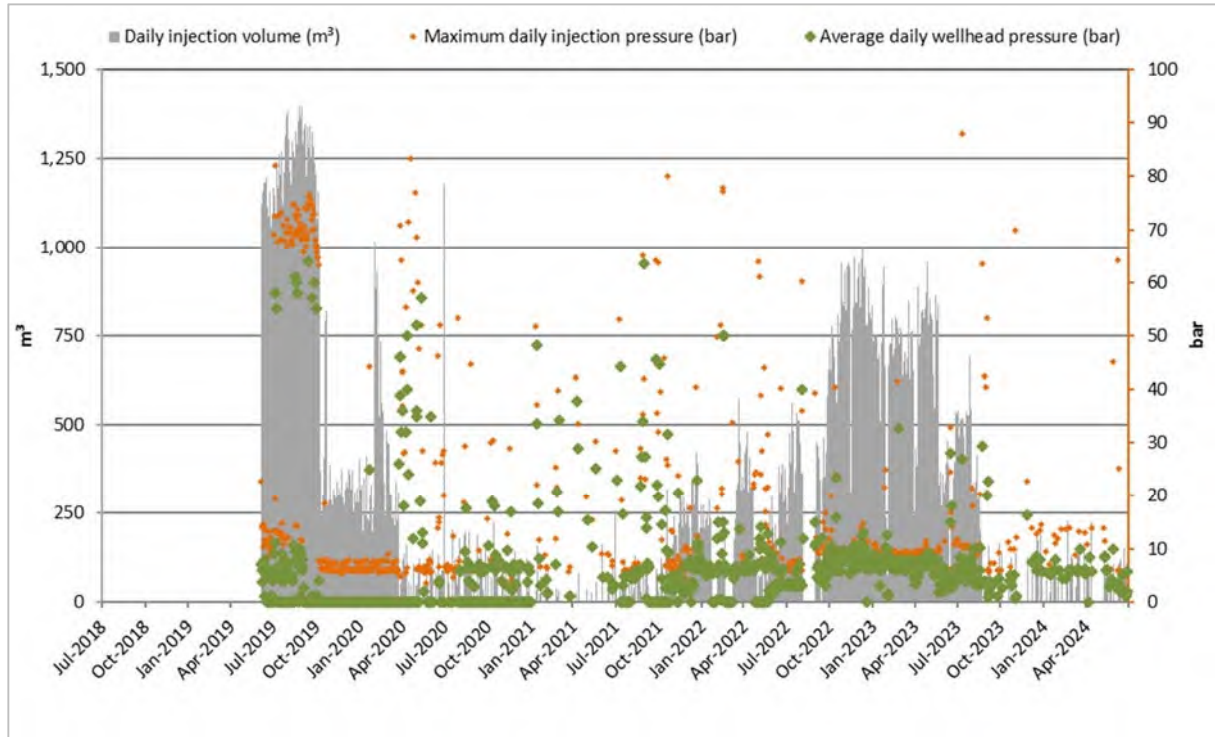


Figure 7 Toko-2B well: Daily injection volumes and injection pressures (2018-2024)

#### 2.4.5 Summary of injection at the Copper Moki wellsite (consent 10927-1)

During the review period there was no fluid injection undertaken at the Copper Moki wellsite via the Copper Moki-3 well, under consent 10927-1. Injection commenced at the wellsite in November 2021 and continued until February 2022.

A summary of the historical injection data for the well is included in Table 17 and presented graphically in Figure 8 below.

Table 17 Summary of injection at the Copper Moki wellsite under consent 10927-1 (2021-2024)

Period	Annual volume (m <sup>3</sup> )	Max. injection volume (m <sup>3</sup> /day)	Max. injection rate* (m <sup>3</sup> /hr)	Max. injection pressure (bar)	Avg. injection pressure (bar)
2023/24	No injection during monitoring period				
2022/23	No injection during monitoring period				
2021/22	2,152	49.3	29.5	47.6	26.7

Note \* calculated using daily volume and hours

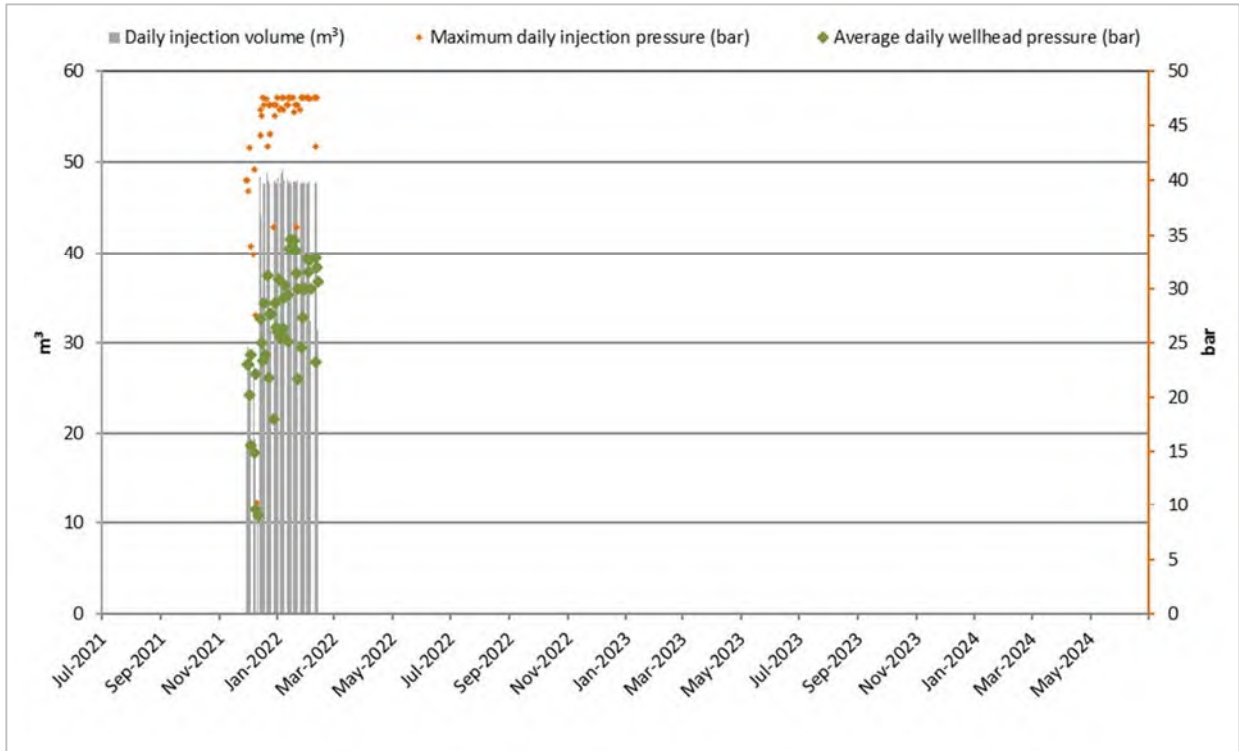


Figure 8 Copper Moki-3 well: Daily injection volumes and injection pressures (2021-2024)

## 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).

During the period under review, 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

During the period under review, the Company exercised two resource consents for the injection of fluids by DWI (3688-2 and 10708-1). Routine inspections of the Company's sites found them to be in good condition and being well managed. No complaints were received from the public in relation to these consents.

The operation of the injection wells is monitored by Company staff, and key injection data is recorded as required under the conditions of their consent. Throughout the monitoring period this data was submitted to the Council at the specified frequency.

A review of the injection data provided by the Company shows that a total of 27,904.99m<sup>3</sup> of fluid was injected over the 2023/24 monitoring period. The majority of this fluid was discharged via the Toko-E and Waihapa-D wellsites.

A visual assessment of the Company's injection data indicates that injection pressures generally fluctuate in response to injection volumes, with higher maximum pressures corresponding with higher daily injection volumes.

During the reported period, injection was undertaken within consented discharge limits and pressures.

### 3.2 Environmental effects of exercise of consents

No adverse environmental effects were recorded by the Council in relation to any DWI consent exercised by the Company.

The groundwater monitoring component of the compliance programme continued during the period under review, with 14 routine samples being taken from monitoring sites in the vicinity of the Company's injection wells. The results of the monitoring carried out show that the groundwater composition at each site has remained stable since the commencement of monitoring. Some very minor fluctuations in analyte concentrations are attributable to seasonal variations in water composition and standard sampling variability. There is no evidence to suggest that injection activities undertaken by the Company during the review period have had any adverse effect on local groundwater quality.

Compliance with the conditions of the Company's DWI consents exercised during the 2023/24 monitoring period is summarised below in Section 3.3.

### 3.3 Evaluation of performance

A tabular summary of the consent holder's compliance record for the year under review is set out in Table 18 to 24. An evaluation of the Company's environmental performance in relation to their DWI activities since 2009 is presented in Table 25.

Table 18 Summary of performance for consent 3688-2

Purpose: To discharge waste drilling fluids, produced water, hydraulic fracturing fluids, including return fluids, and stormwater from hydrocarbon exploration and production operations by deep well injection at the Waihapa-D wellsite		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
1. Consent holder must operate in accordance in Injection Operation Management Plan	Receipt of satisfactory information	Yes

<b>Purpose: To discharge waste drilling fluids, produced water, hydraulic fracturing fluids, including return fluids, and stormwater from hydrocarbon exploration and production operations by deep well injection at the Waihapa-D wellsite</b>		
<b>Condition requirement</b>	<b>Means of monitoring during period under review</b>	<b>Compliance achieved?</b>
2. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh groundwater	Assessment of injection records and results of groundwater sampling and analysis programme	Yes
3. Provision of records for discharge volumes, rates, and pressures	Receipt of well discharge data	Yes
4. Chemical analysis of discharge and submission to the Council	Receipt of discharge analysis results	Yes
5. The injection of fluids shall not fracture any overlying geological seal	Review and analysis of injection data	Yes
6. Lapse condition	Consent exercised	N/A
7. Review provision	Review initiated	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		<b>High</b>
Overall assessment of administrative performance in respect of this consent		<b>High</b>

N/A = not applicable

Table 19 Summary of performance for consent 4094-2

<b>Purpose: To discharge produced water, contaminated stormwater, water based drilling fluids and hydraulic fracturing fluids, including return fluids, by deep well injection into the Matemateaonga Formation</b>		
<b>Condition requirement</b>	<b>Means of monitoring during period under review</b>	<b>Compliance achieved?</b>
1. Consent holder must operate in accordance in Injection Operation Management Plan	Receipt of satisfactory information	Yes
2. Injection pressure must not exceed 85 Bar (1,232psi)	Assessment of consent holder records	No injection
3. Consent holder shall at all times adopt best practicable option (BPO to prevent and/or minimise environmental impact)	Assessment of consent holder records and site inspection results	Yes
4. Provision of records for discharge volumes, rates, and pressures	Receipt of well discharge data	No injection
5. Chemical analysis of discharge and submission to the Council	Receipt of discharge analysis results	No injection
6. Review provision	N/A	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		<b>N/A</b>
Overall assessment of administrative performance in respect of this consent		<b>N/A</b>

N/A = not applicable

Table 20 Summary of performance for consent 10086-1

Purpose: To discharge produced water generated by hydrocarbon exploration and production operations by deep well injection for water flooding purposes at the Waitapu wellsite		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
1. Before exercising the consent the consent holder shall submit an "Injection Operation Management Plan"	Receipt of satisfactory "Injection Operation Management Plan"	Yes
2. Injection well, geological and operational data submission requirements. This information can be included in the "Injection Operation Management Plan"	Receipt of satisfactory information	Yes
3. The injection pressure at the wellhead shall not exceed 689psi	Review and analysis of injection data	Yes
4. No injection permitted after 1 June 2029	Assessment of injection records and site inspection notices	N/A
5. The consent holder shall at all times adopt the best practicable option	Assessment of consent holder records and site inspection notices	Yes
6. The injection of fluids shall be confined to the Mount Messenger Formation, deeper than 1,800m true vertical depth	Review of "Water Flooding Operation Management Plan," well construction log and injection data	Yes
7. The injection of fluids shall not fracture any overlying geological seal	Review and analysis of injection data	Yes
8. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water)	Assessment of injection records and results of groundwater sampling and analysis programme	Yes
9. Maintain full records of injection data	Receipt and assessment of injection data	Yes
10. Maintain records and undertake analysis to characterise each type of waste arriving on-site for discharge	Receipt and assessment of injection data	Yes
11. If the analysis required by condition 10(c) is not carried out in an accredited laboratory sampling shall be undertaken in accordance with a certified Quality Assurance Plan	Sampling undertaken by the Council, and submitted to an accredited laboratory	Yes
12. The data required by conditions 9 & 10 above, for each calendar month, is required to be submitted by the 28th day of the following month	Receipt of satisfactory data by the date specified	Yes
13. The consent holder shall undertake a programme of sampling and testing (the 'Monitoring Programme') that monitors the effects of the exercise of this consent on fresh water resources	Monitoring Programme submitted to the Chief Executive, Taranaki Regional Council, for certification	Yes

<b>Purpose: To discharge produced water generated by hydrocarbon exploration and production operations by deep well injection for water flooding purposes at the Waitapu wellsite</b>		
<b>Condition requirement</b>	<b>Means of monitoring during period under review</b>	<b>Compliance achieved?</b>
14. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for: <ul style="list-style-type: none"> <li>• pH;</li> <li>• conductivity;</li> <li>• chloride; and</li> <li>• total petroleum hydrocarbons</li> </ul>	Implementation of Groundwater Monitoring Programme and assessment of results	Yes
15. All groundwater sampling and analysis shall be undertaken in accordance with a Sampling and Analysis Plan, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken	Receipt of Sampling and Analysis Plan prior to first round of sampling being undertaken	Yes
16. The consent holder shall provide to the Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period	Receipt of satisfactory report by 31 August each year	Yes
17. The consent will lapse on 31 March 2020 unless the consent is exercised before that date	Consent exercised.	Yes
18. Consent review provision	N/A	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		<b>N/A</b>
Overall assessment of administrative performance in respect of this consent		<b>N/A</b>

N/A = not applicable

Table 21 Summary of performance for consent 10708-1

<b>Purpose: To discharge produced water, well drilling fluids, hydraulic fracturing fluids and contaminated stormwater from hydrocarbon exploration and production operations into the Tikorangi Limestone by deep well injection at the Toko-E wellsite</b>		
<b>Condition requirement</b>	<b>Means of monitoring during period under review</b>	<b>Compliance achieved?</b>
1. Before exercising the consent the consent holder shall submit an "Injection Operation Management Plan"	Receipt of satisfactory "Injection Operation Management Plan"	Yes
2. Injection well, geological and operational data submission requirements. This information can be included in the "Injection Operation Management Plan"	Receipt of satisfactory information	Yes
3. No injection permitted after 1 June 2029	Assessment of injection records and site inspection notices	N/A
4. The consent holder shall at all times adopt the best practicable option	Assessment of consent holder records and site inspection notices	Yes

Purpose: To discharge produced water, well drilling fluids, hydraulic fracturing fluids and contaminated stormwater from hydrocarbon exploration and production operations into the Tikorangi Limestone by deep well injection at the Toko-E wellsite		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
5. The injection of fluids shall be confined to the Mount Messenger Formation, deeper than 2,000m true vertical depth	Review of "Water Flooding Operation Management Plan," well construction log and injection data	Yes
6. The injection of fluids shall not fracture any overlying geological seal	Review and analysis of injection data	Yes
7. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water)	Assessment of injection records and results of groundwater sampling and analysis programme	Yes
8. Limits the types of fluids to be discharged	Receipt and assessment of injection data	Yes
9. Maintain records and undertake analysis to characterise each type of waste arriving on-site for discharge	Receipt and assessment of injection data	Yes
10. Maintain full records of injection data	Receipt and assessment of injection data	Yes
11. If the analysis required by condition 9(c) is not carried out in an accredited laboratory sampling shall be undertaken in accordance with a certified Quality Assurance Plan	Sampling undertaken by the Council, and submitted to an accredited laboratory	Yes
12. The data required by conditions 9 & 10 above, for each calendar month, is required to be submitted by the 28th day of the following month	Receipt of satisfactory data by the date specified	Yes
13. The consent holder shall undertake a programme of sampling and testing (the 'Monitoring Programme') that monitors the effects of the exercise of this consent on fresh water resources	Monitoring Programme submitted to the Chief Executive, Taranaki Regional Council, for certification	Yes
14. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for: <ul style="list-style-type: none"> <li>• pH;</li> <li>• conductivity;</li> <li>• chloride; and</li> <li>• total petroleum hydrocarbons</li> </ul>	Implementation of Groundwater Monitoring Programme and assessment of results	Yes
15. All groundwater sampling and analysis shall be undertaken in accordance with a Sampling and Analysis Plan, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken	Receipt of Sampling and Analysis Plan prior to first round of sampling being undertaken	Yes

<b>Purpose: To discharge produced water, well drilling fluids, hydraulic fracturing fluids and contaminated stormwater from hydrocarbon exploration and production operations into the Tikorangi Limestone by deep well injection at the Toko-E wellsite</b>		
<b>Condition requirement</b>	<b>Means of monitoring during period under review</b>	<b>Compliance achieved?</b>
16. The consent holder shall provide to the Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period	Receipt of satisfactory report by 31 August each year	Yes
17. Consent review provision	N/A	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		<b>High</b>
Overall assessment of administrative performance in respect of this consent		<b>High</b>

N/A = not applicable

Table 22 Summary of performance for consent 10763-1

<b>Purpose: To discharge produced water, well drilling fluids, well work over fluids, hydraulic fracturing fluids and contaminated stormwater from hydrocarbon exploration and production operations by deep well injection at the Waihapa-B wellsite</b>		
<b>Condition requirement</b>	<b>Means of monitoring during period under review</b>	<b>Compliance achieved?</b>
1. Before exercising the consent the consent holder shall submit an "Injection Operation Management Plan"	Receipt of satisfactory "Injection Operation Management Plan"	Not yet exercised
2. Injection well, geological and operational data submission requirements. This information can be included in the "Injection Operation Management Plan"	Receipt of satisfactory information	Not yet exercised
3. The consent holder shall monitor for any seismic events within a 5km radius of the Waihapa-B wellsite at a depth of less than 7km below ground	Receipt of satisfactory information	Not yet exercised
4. No injection permitted after 1 June 2029	Assessment of injection records and site inspection notices	N/A
5. The consent holder shall at all times adopt the best practicable option	Assessment of consent holder records and site inspection notices	N/A
6. The injection of fluids shall be confined to the Mount Messenger or Kiore Sandstone Formation, deeper than 878m true vertical depth	Review of Management Plan, well construction log and injection data	N/A
7. The injection of fluids shall not fracture any overlying geological seal	Review and analysis of injection data	N/A
8. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water)	Assessment of injection records and results of groundwater sampling and analysis programme	Baseline samples collected
9. Limits the types of fluids to be discharged	Receipt and assessment of injection data	N/A
10. Limits the types of fluids to be discharged	Receipt and assessment of injection data	N/A



Purpose: To discharge produced water, well drilling fluids, well work over fluids, hydraulic fracturing fluids and contaminated stormwater from hydrocarbon exploration and production operations by deep well injection at the Waihapa-B wellsite		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
11. Maintain full records of injection data	Receipt and assessment of injection data	N/A
12. Maintain records and undertake analysis to characterise each type of waste arriving on-site for discharge	Receipt and assessment of injection data	N/A
13. If the analysis required by condition 12(c) is not carried out in an accredited laboratory sampling shall be undertaken in accordance with a certified Quality Assurance Plan	Sampling undertaken by the Council, and submitted to an accredited laboratory	Yes
14. The data required by conditions 11 & 12 above, for each calendar month, is required to be submitted by the 28th day of the following month	Receipt of satisfactory data by the date specified	Not yet exercised
15. The consent holder shall undertake a programme of sampling and testing (the 'Monitoring Programme') that monitors the effects of the exercise of this consent on fresh water resources	Monitoring Programme submitted to the Chief Executive, Taranaki Regional Council, for certification	Yes
16. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for: <ul style="list-style-type: none"> <li>• pH;</li> <li>• conductivity;</li> <li>• chloride; and</li> <li>• total petroleum hydrocarbons</li> </ul>	Implementation of Groundwater Monitoring Programme and assessment of results	Yes
17. All groundwater sampling and analysis shall be undertaken in accordance with a Sampling and Analysis Plan, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken	Receipt of Sampling and Analysis Plan prior to first round of sampling being undertaken	Yes
18. The consent holder shall provide to the Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period	Receipt of satisfactory report by 31 August each year	Not yet exercised
19. Consent review provision	N/A	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		N/A
Overall assessment of administrative performance in respect of this consent		N/A

N/A = not applicable

Table 23 Summary of performance for consent 10809-1

<b>Purpose: To discharge produced water from hydrocarbon exploration and production operations and gas, into the Tariki Sandstone member of the Otaraoa formation by deep well injection at the Tariki-A wellsite</b>		
<b>Condition requirement</b>	<b>Means of monitoring during period under review</b>	<b>Compliance achieved?</b>
1. Before exercising the consent the consent holder shall submit an "Injection Operation Management Plan"	Receipt of satisfactory "Injection Operation Management Plan"	Not yet exercised
2. Injection well, geological and operational data submission requirements. This information can be included in the "Injection Operation Management Plan"	Receipt of satisfactory information	Not yet exercised
3. The consent holder shall monitor for any seismic events within a 5km radius of the Tariki-A wellsite at a depth of less than 7km below ground	Receipt of satisfactory information	Not yet exercised
4. No injection permitted after 1 June 2034	Assessment of injection records and site inspection notices	N/A
5. The consent holder shall at all times adopt the best practicable option	Assessment of consent holder records and site inspection notices	N/A
6. The injection of fluids shall be confined to the Tariki Sandstone member deeper than 2,300m true vertical depth	Review of Management Plan, well construction log and injection data	N/A
7. The injection of fluids shall not fracture any overlying geological seal	Review and analysis of injection data	N/A
8. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water)	Assessment of injection records and results of groundwater sampling and analysis programme	N/A
9. Limits the types of fluids to be discharged	Receipt and assessment of injection data	N/A
10. Maintain full records of injection data	Receipt and assessment of injection data	N/A
11. Maintain records and undertake analysis to characterise each type of waste arriving on-site for discharge	Receipt and assessment of injection data	N/A
12. If the analysis required by condition 11(c) is not carried out in an accredited laboratory sampling shall be undertaken in accordance with a certified Quality Assurance Plan	Sampling undertaken by the Council, and submitted to an accredited laboratory	Not yet exercised
13. The data required by conditions 10 & 11 above, for each calendar month, is required to be submitted by the 28th day of the following month	Receipt of satisfactory data by the date specified	Not yet exercised

Purpose: To discharge produced water from hydrocarbon exploration and production operations and gas, into the Tariki Sandstone member of the Otaraoa formation by deep well injection at the Tariki-A wellsite		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
14. The consent holder shall undertake a programme of sampling and testing (the 'Monitoring Programme') that monitors the effects of the exercise of this consent on fresh water resources	Monitoring Programme submitted to the Chief Executive, Taranaki Regional Council, for certification	N/A
15. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for: <ul style="list-style-type: none"> <li>• pH;</li> <li>• conductivity;</li> <li>• chloride; and</li> <li>• total petroleum hydrocarbons</li> </ul>	Implementation of Groundwater Monitoring Programme and assessment of results	N/A
16. All groundwater sampling and analysis shall be undertaken in accordance with a Sampling and Analysis Plan, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken	Receipt of Sampling and Analysis Plan prior to first round of sampling being undertaken	N/A
17. The consent holder shall provide to the Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period	Receipt of satisfactory report by 31 August each year	Not yet exercised
18. Consent review provision	N/A	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		N/A
Overall assessment of administrative performance in respect of this consent		N/A

N/A = not applicable

Table 24 Summary of performance for consent 10927-1

Purpose: To discharge produced water, well drilling fluids, well workover fluids and contaminated stormwater via deep well injection into the Mt Messenger Formation at the Copper Moki wellsite, at depths below 1,400mTVDSS for the purpose of water flooding		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
1. Before exercising the consent the consent holder shall submit an "Injection Operation Management Plan"	Receipt of satisfactory "Injection Operation Management Plan"	Yes
2. Injection well, geological and operational data submission requirements. This information can be included in the "Injection Operation Management Plan"	Receipt of satisfactory information	Yes

Purpose: To discharge produced water, well drilling fluids, well workover fluids and contaminated stormwater via deep well injection into the Mt Messenger Formation at the Copper Moki wellsite, at depths below 1,400mTVDSS for the purpose of water flooding		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
3. The consent holder shall monitor for any seismic events within a 5km radius of the Copper Moki wellsite at a depth of less than 7km below ground	Receipt of satisfactory information	N/A
4. No injection permitted after 1 June 2035	Assessment of injection records and site inspection notices	N/A
5. The consent holder shall at all times adopt the best practicable option	Assessment of consent holder records and site inspection notices	Yes
6. The injection of fluids shall be confined to the Mount Messenger Formation at a minimum depth of 1400 metres true vertical depth subsea.	Review of Management Plan, well construction log and injection data	No injection
7. The injection of fluids shall not fracture any overlying geological seal	Review and analysis of injection data	No injection
8. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water)	Assessment of injection records and results of groundwater sampling and analysis programme	No injection
9. Limits the types of fluids to be discharged	Receipt and assessment of injection data	No injection
10. Maintain full records of injection data	Receipt and assessment of injection data	No injection
11. Maintain records and undertake analysis to characterise each type of waste arriving on-site for discharge	Receipt and assessment of injection data	No injection
12. If the analysis required by condition 11(c) is not carried out in an accredited laboratory sampling shall be undertaken in accordance with a certified Quality Assurance Plan	Sampling undertaken by the Council, and submitted to an accredited laboratory	Yes
13. The data required by conditions 10 & 11 above, for each calendar month, is required to be submitted by the 28th day of the following month	Receipt of satisfactory data by the date specified	Yes
14. The consent holder shall undertake a programme of sampling and testing (the 'Monitoring Programme') that monitors the effects of the exercise of this consent on fresh water resources	Monitoring Programme submitted to the Chief Executive, Taranaki Regional Council, for certification	Yes

Purpose: To discharge produced water, well drilling fluids, well workover fluids and contaminated stormwater via deep well injection into the Mt Messenger Formation at the Copper Moki wellsite, at depths below 1,400mTVDSS for the purpose of water flooding		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
15. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for: <ul style="list-style-type: none"> <li>• pH</li> <li>• conductivity</li> <li>• chloride; and</li> <li>• total petroleum hydrocarbons</li> </ul>	Implementation of Groundwater Monitoring Programme and assessment of results	Yes
16. All groundwater sampling and analysis shall be undertaken in accordance with a Sampling and Analysis Plan, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken	Receipt of Sampling and Analysis Plan prior to first round of sampling being undertaken	Yes
17. The consent holder shall provide to the Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period	Receipt of satisfactory report by 31 August each year	Yes
18. Consent review provision	N/A	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		<b>Not exercised</b>
Overall assessment of administrative performance in respect of this consent		<b>Not exercised</b>

N/A = not applicable

Table 25 Evaluation of environmental performance over time

Year	Consent numbers	High	Good	Improvement req	Poor	Not exercised
2019/20	3688, 4094, 10086, 10708, 10763, 10809	2	-	-	-	4
2020/21	3688, 4094, 10086, 10708, 10763, 10809	3	-	-	-	3
2021/22	3688, 4094, 10086, 10708, 10763, 10809, 10927	4	-	-	-	3
2022/23	3688, 4094, 10086, 10708, 10763, 10809, 10927	3	-	-	-	4
2023/24	3688, 4094, 10086, 10708, 10763, 10809, 10927	2	-	-	-	5

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

### 3.4 Recommendations from the 2022/23 Annual Report

In the 2022/23 Annual Report, it was recommended:

1. THAT in the first instance, monitoring of consented activities in the 2023/24 year continue at the same level as in 2022/23.

2. THAT the Company expedites the plugging and abandonment of the Waihapa-7A well.
3. THAT should there be issues with environmental or administrative performance in 2023/24, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.
4. THAT the option for a review of the remaining resource consents in June 2024, as set out in the respective consent conditions not be exercised.

The majority of recommendations above were implemented during the period under review. The exception is as follows:

- The plugging and abandonment of the Waihapa-7A well has not yet been completed.

Discussions are ongoing and NZEC are working with the well examiner on developing the most appropriate decommissioning plan.

This will be included in the recommendations for the 2023/24 monitoring period.

### **3.5 Alterations to monitoring programmes for 2024/25**

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 the range of monitoring carried out during the 2023/24 period be continued during the 2024/25 monitoring period. Recommendations to this effect are included in Section 4 of this report.

It should be noted that the proposed programme represents a reasonable and risk-based level of monitoring for the site(s) 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 2024/25.

### **3.6 Exercise of optional review of consent**

Consents 10086-1, 10708-1, 10763-1, 10809-1 and 10927-1 provide for an optional review in June 2025. Reviews can be pursued if there are grounds that the conditions are not adequate to deal with any adverse effects on the environment arising from the exercise of the resource consent, which were either not foreseen at the time the application was considered or which was not appropriate to deal with at the time.

Based on the results of monitoring in the year under review, and in previous years as set out in earlier annual compliance monitoring reports, it is considered that there are no grounds that require a review to be pursued or grounds to exercise the review option on the above consents.

## 4. Recommendations

1. THAT in the first instance, monitoring of consented activities in the 2024/25 year continue at the same level as in 2023/24.
2. THAT the Company discusses a plan for the plugging and abandonment of the Waihapa-7A well.
3. THAT should there be issues with environmental or administrative performance in 2024/25, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.
4. THAT the option for a review of the remaining resource consents in June 2025, as set out in the respective consent conditions not be exercised.

## Glossary of common terms and abbreviations

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

Aquifer (freshwater)	A formation, or group or part of a formation that contains sufficient saturated permeable media to yield exploitable quantities of fresh water.
BPO	Best practicable option.
Conductivity	A measure of the level of dissolved salts in a sample. Usually measured at 25°C and expressed as microsiemens per centimetre ( $\mu\text{S}/\text{cm}$ ) or as Total Dissolved Solids ( $\text{g}/\text{m}^3$ ).
Confining layer	A geological layer or rock unit that is impermeable to fluids.
Deep well injection (DWI)	Injection of fluids at depth for disposal or enhanced recovery.
Fracture gradient	A measure of how the pressure required to fracture rock in the earth's crust changes with depth. It is usually measured in units of "pounds per square inch per foot" (psi/ft) and varies with the type of rock and the strain of the rock.
$\text{g}/\text{m}^3$	Grams per cubic metre. A measure of concentration which is equivalent to milligrams per litre (mg/L), or parts per million (ppm).
Hydraulic fracturing (HF)	The process of increasing reservoir permeability by injecting fluids at pressures sufficient to fracture rock within the reservoir ("fracking").
Injectate	Fluid disposed of by deep well injection.
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.
IR	Unauthorised 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 bgl	Metres below ground level.
m bmp	Metres below measuring point.
$\mu\text{S}/\text{cm}$	Microsiemens per centimetre
mS/m	Millisiemens per metre.
m TVD	Metres true vertical depth.
$\text{m}^3$	Cubic metre.



N/A	Not applicable.
pH	Numerical system for measuring acidity in solutions, with 7 as neutral. Values lower than 7 are acidic and higher than 7 are 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.
Plug and abandon	To prepare a wellbore to be shut in and permanently isolated.
Produced water	Water associated with oil and gas reservoirs that is produced along with the oil and gas. Typically highly saline with salt concentrations similar to seawater and containing low levels of hydrocarbons.
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).
UI	Unauthorised Incident.
Water flooding	A method of thermal recovery in which hot water is injected into a reservoir through specially distributed injection wells. Hot water flooding reduces the viscosity of the crude oil, allowing it to move more easily toward production wells.
WPS	Waihapa Production Station.

For further information on analytical methods, contact a manager within the Environment Quality Department.

## Bibliography and references

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- Taranaki Regional Council (2015): NZEC Waihapa Ltd Deep Well Injection Monitoring Programme Annual Report 2013-2014. Technical report 2014-96. Document number 1468314.
- Taranaki Regional Council (2012): Origin Energy Resources New Zealand Ltd Deep Well Injection Monitoring Programme Triennial Report (2009-2012). Technical report 2011-85. Document number 1114242.

## Appendix I

### Resource consents held by New Zealand Energy Corporation

(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: NZEC Waihapa Limited  
P O Box 8440  
NEW PLYMOUTH 4342

Decision Date  
(Change): 3 September 2013

Commencement Date  
(Change): 3 September 2013 (Granted: 23 June 2003)

**Conditions of Consent**

Consent Granted: To discharge waste drilling fluids, produced water, hydraulic fracturing fluids, including return fluids, and stormwater from hydrocarbon exploration and production operations by deepwell injection at the Waihapa-D wellsite

Expiry Date: 1 June 2034

Review Date(s): June 2016, June 2022, June 2028

Site Location: Waihapa-D wellsite, Cheal Road, Ngaere, Stratford  
(Property owner: A & J Moore)

Legal Description: Lot 1 DP 17294 Blk VII Ngaere SD (Discharge source & site)

Grid Reference (NZTM) 1718010E-5638199N

Catchment: Patea

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

### 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. Prior to the exercise of this consent for each individual well to be used for deep well injection, the consent holder shall submit, to the written satisfaction of the Chief Executive, a log of the injection well, and an injection well operation management plan, to demonstrate that special condition 2 of this consent can be met. The report shall:
  - a) identify the injection zone, including a validated bore log and geophysical log,
  - b) detail the results of fluid sampled from the injection zone, and the proposed wastes to be injected for maximum and mean concentrations for pH, suspended solids, total dissolved solids, salinity, chlorides, and total hydrocarbons;
  - c) demonstrate the integrity of well casing; and
  - d) outline design and operational procedure to isolate the zone.
2. The resource consent holder shall ensure that injection will not contaminate or endanger any actual or potential useable freshwater aquifer.
3. The consent holder shall keep daily records of the amounts of all material injected, including injection pressure and rate, and shall make the records available to the Taranaki Regional Council on a 12 monthly basis, and when there has been a significant pressure change event.
4. The consent holder shall monitor the injected material monthly, and upon the request of the Taranaki Regional Council. Concentrations of suspended solids, total dissolved solids, salinity, chlorides, total hydrocarbons, and pH shall be monitored and the records made available to the Taranaki Regional Council on a 12 monthly basis.
5. The consent holder shall inject fluids at pressures below the pressure that would be required to fracture the stratigraphic seals of injection formation.

Consent 3688-2

6. This consent shall lapse on the expiry of five years after the date of commencement of this consent, 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(b) of the Resource Management Act 1991.
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 following receipt of information required under special conditions 3 and 4 above, and the month of June 2010 and/or June 2016 and/or June 2022 and/or June 2028 required 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 1 November 2013

For and on behalf of  
Taranaki Regional Council



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**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: NZEC Waihapa Limited  
P O Box 8440  
NEW PLYMOUTH 4342

Decision Date  
(Change): 3 September 2013

Commencement Date  
(Change): 3 September 2013 (Granted: 10 September 2010)

**Conditions of Consent**

Consent Granted: To discharge produced water, contaminated stormwater, water based drilling fluids and hydraulic fracturing fluids, including return fluids, by deepwell injection into the Matemateaonga Formation

Expiry Date: 1 June 2028

Review Date(s): June 2016, June 2022

Site Location: Waihapa-F wellsite, 7 Bird Road, Stratford

Legal Description: Sec 10 Blk III Ngaere SD (Discharge source & site)

Grid Reference (NZTM) 1717193E-5642014N

Catchment: Patea

Tributary: Ngaere

*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 operate the well in accordance with the "Origin Energy Resources NZ Limited - Deep Well Injection Management Plan" dated June 2010. In particular, Section 7 of the plan (page 11) which identifies the conditions that would trigger concerns about the integrity of the well, or the injection zone, and the action to be taken by the consent holder if trigger conditions are reached.
2. The injection pressure at the wellhead shall not exceed a maximum injection pressure of 85 bars (1,232 PSI).
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 any actual or likely adverse effect on the environment; in particular, ensuring that the injection material is contained within the injection zone.
4. The consent holder shall keep daily records of:
  - a) maximum injection pressure;
  - b) maximum and average rate of injection; and
  - c) volume of fluid injected;

during operation of the well. These records shall be provided to the Taranaki Regional Council at the end of each month.

5. The consent holder shall measure and record the following constituents of the discharge at the end of each month:
  - a) pH;
  - b) suspended solids concentration;
  - c) temperature;
  - d) salinity;
  - e) chloride concentration; and
  - f) total hydrocarbon concentration.

The consent holder shall provide to Taranaki Regional Council, during the month of May of every year, a summary of all records collected in accordance with this condition. The consent holder must also provide any details on the major changes in characteristics or sources of injected fluid.

Consent 4094-2

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 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.

Signed at Stratford on 1 November 2013

For and on behalf of  
Taranaki Regional Council



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**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: Taranaki Ventures Limited  
PO Box 8440  
New Plymouth 4342

Decision Date: 31 March 2015

Commencement Date: 31 March 2015

**Conditions of Consent**

Consent Granted: To discharge produced water generated by hydrocarbon exploration and production operations by deep well injection for waterflooding purposes at the Waitapu wellsite

Expiry Date: 1 June 2034

Review Date(s): June annually

Site Location: Waitapu wellsite, 326 Cheal Road, Ngaere  
(Property owner: WK Slattery)

Legal Description: Secs 49, 73, 75, 80, 81 Blk VI Ngaere SD  
(Discharge source & site)

Grid Reference (NZTM) 1715783E-5637623N

Catchment: Patea

Tributary: Ngaere

*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. Before exercising this consent, the consent holder shall submit an "Injection Operation Management Plan." The plan shall include the operational details of the injection activities and identify the conditions that would trigger concerns about the integrity of the injection well, the receiving formation or overlying geological seals. The plan shall also detail the action(s) to be taken by the consent holder if trigger conditions are reached.
2. Before exercising this consent, the consent holder shall provide to the Chief Executive, Taranaki Regional Council:
  - a) a geological assessment of the environment in which the well is located, including the injection zone, the geological seals confining the injection zone and any associated faulting;
  - b) details of the injection well design and its structural integrity;
  - c) an assessment of the suitability of the injection well for the proposed activity;
  - d) details of how the integrity of the injection well will be monitored and maintained;
  - e) confirmation of the depth to which fresh water resources, as defined in condition 8, are encountered below the site; and
  - f) a chemical assessment of the receiving formation water which confirms its Total Dissolved Solids concentration, and also demonstrates that the mixing of formation and injection fluids will not result in any adverse effects on the receiving formation or the injection well.

(Note: The information required by condition 2 may be included within the "Injection Operation Management Plan" required by condition 1).

3. The injection pressure at the wellhead shall not exceed 689 psi.
4. There shall be no injection of any fluids after 1 June 2029.
5. 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.
6. The injection of fluids shall be confined to the Mount Messenger Formation, and be injected at a minimum depth of 1,800 metres true vertical depth below ground level.
7. The consent holder shall ensure that the discharge authorised by this consent does not result in the fracturing of the geological seals confining the injection zone.

## Consent 10086-1.0

8. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water). Useable fresh groundwater is defined as any groundwater having a Total Dissolved Solids concentration of less than 1,000 mg/l.
9. Once the consent is exercised, the consent holder shall keep daily records of the:
  - a) injection hours;
  - b) volume of fluid discharged; and
  - c) maximum and average injection pressure.
10. For each waste stream arriving on site for discharge, the consent holder shall characterise the fluids by recording the following information:
  - a) type of fluid;
  - b) source of fluid (site name and company);
  - c) an analysis of a representative sample of the fluid for:
    - i. pH;
    - ii. conductivity;
    - iii. suspended solids concentration;
    - iv. temperature;
    - v. salinity;
    - vi. chloride concentration; and
    - vii. total hydrocarbon concentration.

The analysis required by condition 10(c) above is not necessary if a sample of the same type of fluid, from the same source, has been taken, analysed and provided to the Chief Executive, Taranaki Regional Council within the previous 6 months.

11. If the analysis required by condition 10(c) above is not carried out in an International Accreditation New Zealand accredited laboratory, it shall be undertaken in accordance with a "Quality Assurance Plan" that has been certified by the Chief Executive, Taranaki Regional Council, as meeting the requirements of condition 10. The Council may also, at its discretion, carry out an audit of the consent holder's sampling and analysis regime to assess adherence to the Quality Assurance plan.
12. The information required by conditions 9 and 10 above, for each calendar month, shall be provided to the Chief Executive, Taranaki Regional Council before the 28<sup>th</sup> day of the following month.
13. The consent holder shall undertake a programme of sampling and testing that monitors the effects of the exercise of this consent on fresh water resources within an Area of Review to assess compliance with condition 8 (the 'Monitoring Programme'). The Monitoring Programme shall be designed to characterise local groundwater quality, and be submitted to the Chief Executive, Taranaki Regional Council, for certification before the exercising of this consent, and shall include:
  - a) the location of sampling sites;
  - b) well/bore construction details; and
  - c) sampling frequency.

## Consent 10086-1.0

The Area of Review shall extend 1,000 metres from the point of injection. It is a requirement that at least one suitable monitoring bore be located within 500 metres of the well head. If no suitable existing bores are available, it will be necessary for the Monitoring Programme to include installation of, and sampling from, a suitable bore. The bore would be of a depth, location and design determined after consultation with the Chief Executive, Taranaki Regional Council and installed in accordance with NZS 4411:2001.

14. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for:
- a) pH;
  - b) conductivity;
  - c) chloride; and
  - d) total petroleum hydrocarbons.

*Note: The samples required, under conditions 13 and 14, could be taken and analysed by the Taranaki Regional Council or other contracted party on behalf of the consent holder.*

15. All groundwater sampling and analysis shall be undertaken in accordance with a *Sampling and Analysis Plan*, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken. This Plan shall specify the use of standard protocols recognised to constitute good professional practice including quality control and assurance. An International Accreditation New Zealand accredited laboratory shall be used for all sample analysis. Results shall be provided to the Chief Executive, Taranaki Regional Council within 30 days of sampling and shall include supporting quality control and assurance information.

*Note: The Sampling and Analysis Plan may be combined with the Monitoring Programme required by condition 13.*

16. The consent holder shall provide to the Chief Executive, Taranaki Regional Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period. Based on the data provided, the report shall also provide:
- a) an assessment of injection well performance;
  - b) an assessment of the on-going integrity and isolation of the wellbore;
  - c) an assessment of the on-going integrity and isolation of the receiving formation; and
  - d) an updated injection modeling report, demonstrating the ability of the receiving formation to continue to accept additional waste fluids and an estimation of remaining storage capacity.

17. This consent shall lapse on 31 March 2020, 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 10086-1.0

18. 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 each year, 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 31 March 2015

For and on behalf of  
Taranaki Regional Council

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B G Chamberlain  
**Chief Executive**



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

Name of  
Consent Holder: NZEC Waihapa Limited  
PO Box 8440  
New Plymouth 4342

Decision Date 29 January 2019

Commencement Date 29 January 2019

**Conditions of Consent**

Consent Granted: To discharge produced water, well drilling fluids, well work over fluids, hydraulic fracturing fluids and contaminated stormwater from hydrocarbon exploration and production operations into the Tikorangi Limestone by deep well injection at the Toko-E wellsite

Expiry Date: 1 June 2034

Review Date(s): June annually

Site Location: Toko-E wellsite, Standish Road, Toko

Grid Reference (NZTM) 1716683E-5647191N

Catchment: Patea

Tributary: Manawawiri

*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. Before exercising the consent, the consent holder shall submit an "Injection Operation Management Plan." The plan shall include the operational details of the injection activities and identify the conditions that would trigger concerns about the integrity of the injection well, the receiving formation or overlying geological seals. The plan shall also detail the action(s) to be taken by the consent holder if trigger conditions are reached.
2. Before exercising the consent, the consent holder shall provide to the Chief Executive, Taranaki Regional Council:
  - (a) a geological assessment of the environment in which the well is located, including the injection zone, the geological seals confining the injection zone and any associated faulting;
  - (b) details of the injection well design and its structural integrity;
  - (c) an assessment of the suitability of the injection well for the proposed activity;
  - (d) details of how the integrity of the injection well will be monitored and maintained;
  - (e) confirmation of the depth to which fresh water resources, as defined in condition 7, are encountered below the site; and
  - (f) a chemical assessment of the receiving formation water which confirms its Total Dissolved Solids (TDS) concentration, and also demonstrates that the mixing of formation and injection fluids will not result in any adverse effects on the receiving formation or the injection well.

*(Note: The information required by condition 2 may be included within the "Injection Operation Management Plan" required by condition 1).*

3. There shall be no injection of any fluids after 1 June 2029.
4. 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.
5. The injection of fluids shall only be injected to the Tikorangi Limestone formation, at a minimum depth of 2000 metres true vertical depth sub-sea.
6. The consent holder shall ensure that the discharge authorised by this consent does not result in the fracturing of the geological seals confining the injection zone.

## Consent 10708-1.0

7. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water). Useable fresh groundwater is defined as any groundwater having a TDS concentration of less than 1,000 mg/L.
8. Only the following types of fluid may be discharged:
  - (a) produced water;
  - (b) well drilling fluids;
  - (c) well workover fluids, including hydraulic fracturing fluids; and
  - (d) contaminated stormwater.
9. For each waste stream arriving on site for discharge, the consent holder shall characterise the fluids by recording the following information:
  - (a) type of fluid (as listed in condition 8);
  - (b) source of fluid (site name and company);
  - (c) an analysis of a representative sample of the fluid for:
    - (i) pH;
    - (ii) conductivity;
    - (iii) suspended solids concentration;
    - (iv) temperature;
    - (v) salinity;
    - (vi) chloride concentration; and
    - (vii) total hydrocarbon concentration.

The analysis required by condition 9(c) above is not necessary if a sample of the same type of fluid, from the same source, has been taken, analysed and provided to the Chief Executive, Taranaki Regional Council within the previous 6 months.

10. Once the consent is exercised, the consent holder shall keep daily records of the:
  - (a) injection hours;
  - (b) volume of fluid discharged; and
  - (c) maximum and average injection pressure.
11. If the analysis required by condition 9(c) above is not carried out in an International Accreditation New Zealand (IANZ) accredited laboratory, it shall be undertaken in accordance with a "Quality Assurance (QA) Plan" that has been certified by the Chief Executive, Taranaki Regional Council, as meeting the requirements of condition 9. The Council may also, at its discretion, carry out an audit of the consent holder's sampling and analysis regime to assess adherence to the QA plan.
12. The information required by conditions 9 and 10 above, for each calendar month, shall be provided to the Chief Executive, Taranaki Regional Council before the 28<sup>th</sup> day of the following month.

## Consent 10708-1.0

13. The consent holder shall undertake a programme of sampling and testing that monitors the effects of the exercise of this consent on fresh water resources to assess compliance with condition 7 (the 'Monitoring Programme'). The Monitoring Programme shall be submitted to the Chief Executive, Taranaki Regional Council, for certification before exercising the consent, and shall include:
- (a) the location of sampling sites;
  - (b) well/bore construction details; and
  - (c) sampling frequency.

It is a minimum requirement that at least one suitable monitoring bore be located within 500 metres of the well head. If no suitable existing bores are available, it will be necessary for the Monitoring Programme to include installation of, and sampling from, a suitable bore. The bore would be of a depth, location and design determined after consultation with the Chief Executive, Taranaki Regional Council and installed in accordance with NZS 4411:2001.

14. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for:
- (a) pH;
  - (b) conductivity;
  - (c) chloride; and
  - (d) total petroleum hydrocarbons.

*Note: The samples required, under conditions 13 and 14, could be taken and analysed by the Council or other contracted party on behalf of the consent holder.*

15. All groundwater sampling and analysis shall be undertaken in accordance with a *Sampling and Analysis Plan*, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken. This Plan shall specify the use of standard protocols recognised to constitute good professional practice including quality control and assurance. An IANZ accredited laboratory shall be used for all sample analysis. Results shall be provided to the Chief Executive, Taranaki Regional Council within 30 days of sampling and shall include supporting quality control and assurance information.

*Note: The Sampling and Analysis Plan may be combined with the Monitoring Programme required by condition 13.*

16. The consent holder shall provide to the Chief Executive, Taranaki Regional Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period. Based on the data provided, the report shall also provide:
- a) an assessment of injection well performance;
  - b) an assessment of the on-going integrity and isolation of the wellbore;
  - c) an assessment of the on-going integrity and isolation of the receiving formation; and
  - d) an updated injection modeling report, demonstrating the ability of the receiving formation to continue to accept additional waste fluids and an estimation of remaining storage capacity.

Consent 10708-1.0

17. 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 each year, 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 29 January 2019

For and on behalf of  
Taranaki Regional Council

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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  
Consent Holder: NZEC Waihapa Limited  
PO Box 8840  
New Plymouth 4342

Decision Date 10 September 2019

Commencement Date 10 September 2019

**Conditions of Consent**

Consent Granted: To discharge produced water, well drilling fluids, well work over fluids, hydraulic fracturing fluids and contaminated stormwater from hydrocarbon exploration and production operations by deep well injection at the Waihapa-B wellsite

Expiry Date: 1 June 2034

Review Date(s): June annually

Site Location: Waihapa-B wellsite, 395 Cheal Road, Stratford

Grid Reference (NZTM) 1717710E-5639535N

Catchment: Patea

Tributary: Waihapa

*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. Before exercising the consent, the consent holder shall submit an "Injection Operation Management Plan." The plan shall include the operational details of the injection activities and identify the conditions that would trigger concerns about the integrity of the injection well, the receiving formation or overlying geological seals. The plan shall also detail the action(s) to be taken by the consent holder if trigger conditions are reached.
2. Prior to any injection commencing from a well, or any change in the injection formation, the consent holder shall provide to the Chief Executive, Taranaki Regional Council for each well:
  - (a) a geological assessment of the environment in which the well is located, including the injection zone, the geological seals confining the injection zone and any associated faulting;
  - (b) details of the injection well design and its structural integrity; including but not limited to:
    - (i) the results of pressure testing of tubing and annulus;
    - (ii) an engineering evaluation of tubing and casing integrity, including burst pressures; and
    - (iii) an assessment of the current adequacy of the cement bond in providing zonal isolation
  - (c) an overall assessment of the suitability of the injection well for the proposed activity;
  - (d) details of how the ongoing integrity of the injection well will be monitored and maintained;
  - (e) confirmation of the depth to which fresh water resources, as defined in condition 9, are encountered below the site;
  - (f) a chemical assessment of the receiving formation water which confirms its Total Dissolved Solids (TDS) concentration, and also demonstrates that the mixing of formation and injection fluids will not result in any adverse effects on the receiving formation or the injection well; and
  - (g) maps showing any identified faults (active or inactive) within 2 km of the modelled injection plume and the potential for adverse environmental effects due to the presence of the identified faults.

*(Note: The information required by condition 2 may be included within the "Injection Operation Management Plan" required by condition 1).*

## Consent 10763-1.0

3. If the GeoNet seismic monitoring network records a seismic event within a 5 km radius of the Waihapa-B wellsite (1717710E-5639535N) at a depth of less than 7 km below ground level that exceeds a summary magnitude of 3.0:
  - (a) if deep well injection is currently being undertaken it shall cease immediately and not recommence; or
  - (b) if a deep well injection has within the previous 72 hours no further deep well injection shall occur into the Formation;
  - (c) the consent holder shall provide a report to the Chief Executive, Taranaki Regional Council on the likelihood of the seismic event being induced by the exercise of this consent; and
  - (d) deep well injection may only then continue once the Chief Executive, Taranaki Regional Council has considered the report and concluded that the environmental risk of recommencing injection is acceptable and has advised the consent holder accordingly.
4. There shall be no injection of any fluids after 1 June 2029.
5. 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.
6. The injected fluids shall be confined to the Mount Messenger or Kiore Sandstone Formations, at a minimum depth of 878 metres true vertical depth sub-sea.
7. The consent holder shall ensure that the discharge authorised by this consent does not result in the fracturing of the geological seals confining the injection zone.
8. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water). Useable fresh groundwater is defined as any groundwater having a TDS concentration of less than 1,000 mg/l.
9. Only the following types of fluid may be discharged:
  - (a) produced water;
  - (b) well drilling fluids; and
  - (c) well workover fluids, including hydraulic fracturing fluids.
10. The fluids discharged under this consent shall only be those listed in condition 9(a) to 9(c) above, and other fluids that:
  - (a) can reasonably be expected to be used in petrochemical well maintenance and development in accordance with industry best practice;
  - (b) have environmental effects that are no more adverse than those listed in 9(a)–9(c) above;
  - (c) have been certified by the Chief Executive, Taranaki Regional Council as complying with 10(a) and 10(b) above; and
  - (d) have been the subject of a specific request for certification, in accordance with 10(c) above, that includes details of the proposed contaminant.

## Consent 10763-1.0

11. Once the consent is exercised, the consent holder shall keep daily records of the:
  - (a) injection hours;
  - (b) volume of fluid discharged; and
  - (c) maximum and average injection pressure.
  
12. For each waste stream arriving on site for discharge, the consent holder shall characterise the fluids by recording the following information:
  - (a) type of fluid (as listed in condition 9);
  - (b) source of fluid (site name and company);
  - (c) an analysis of a representative sample of the fluid for:
    - (i) pH;
    - (ii) conductivity;
    - (iii) suspended solids concentration;
    - (iv) temperature;
    - (v) salinity;
    - (vi) chloride concentration; and
    - (vii) total hydrocarbon concentration.

The analysis required by condition 12(c) above is not necessary if a sample of the same type of fluid, from the same source, has been taken, analysed and provided to the Chief Executive, Taranaki Regional Council within the previous 6 months.

13. If the analysis required by condition 12(c) above is not carried out in an International Accreditation New Zealand (IANZ) accredited laboratory, it shall be undertaken in accordance with a "Quality Assurance (QA) Plan" that has been certified by the Chief Executive, Taranaki Regional Council, as meeting the requirements of condition 12. The Taranaki Regional Council may also, at its discretion, carry out an audit of the consent holder's sampling and analysis regime to assess adherence to the QA plan.
  
14. The information required by conditions 11 and 12 above, for each calendar month, shall be provided to the Chief Executive, Taranaki Regional Council before the 28<sup>th</sup> day of the following month.
  
15. The consent holder shall undertake a programme of sampling and testing that monitors the effects of the exercise of this consent on fresh water resources within an Area of Review (AoR) to assess compliance with condition 8 (the 'Monitoring Programme'). The Monitoring Programme shall be designed to characterise local groundwater quality, and be submitted to the Chief Executive, Taranaki Regional Council, for certification before exercising the consent, and shall include:
  - (a) the location of sampling sites;
  - (b) well/bore construction details; and
  - (c) sampling frequency.

The AoR shall extend 1,000 m from the point of injection. It is a requirement that at least one suitable monitoring bore be located within 500 metres of the well head. If no suitable existing bores are available, it will be necessary for the Monitoring Programme to include installation of, and sampling from, a suitable bore. The bore would be of a depth, location and design determined after consultation with the Chief Executive, Taranaki Regional Council and installed in accordance with NZS 4411:2001.

## Consent 10763-1.0

16. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for:

- (a) pH;
- (b) conductivity;
- (c) chloride; and
- (d) total petroleum hydrocarbons.

*Note: The samples required, under conditions 15 and 16, could be taken and analysed by the Council or other contracted party on behalf of the consent holder.*

17. All groundwater sampling and analysis shall be undertaken in accordance with a *Sampling and Analysis Plan*, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken. This Plan shall specify the use of standard protocols recognised to constitute good professional practice including quality control and assurance. An IANZ accredited laboratory shall be used for all sample analysis. Results shall be provided to the Chief Executive, Taranaki Regional Council within 30 days of sampling and shall include supporting quality control and assurance information.

*Note: The Sampling and Analysis Plan may be combined with the Monitoring Programme required by condition 15.*

18. The consent holder shall provide to the Chief Executive, Taranaki Regional Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period. Based on the data provided, the report shall also provide:

- (a) an assessment of injection well performance;
- (b) details of the injection well design and its structural integrity; including but not limited to:
  - (i) an assessment of the current adequacy of the well's zonal isolation; and
  - (ii) the results of annual annulus pressure testing and/or continuous pressure monitoring
- (c) results of the most recent five yearly casing inspection or engineering evaluation confirming the ongoing security of the casing;
- (d) an assessment of the on-going integrity and isolation of the receiving formation;
- (e) an updated injection modeling report, demonstrating the ability of the receiving formation to continue to accept additional waste fluids and an estimation of remaining storage capacity;
- (f) an updated map showing any identified faults (active or inactive) within 2 km of the modelled injection plume; and
- (g) the results of any seismic monitoring undertaken in compliance with condition 3 of the consent.

Consent 10763-1.0

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 each year, 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 10 September 2019

For and on behalf of  
Taranaki Regional Council

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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  
Consent Holder: NZEC Tariki Limited  
PO Box 8440  
New Plymouth 4342

Decision Date 5 February 2020

Commencement Date 5 February 2020

**Conditions of Consent**

Consent Granted: To discharge produced water from hydrocarbon exploration and production operations and gas, into the Tariki Sandstone member of the Otaraoa formation by deep well injection at the Tariki-A wellsite

Expiry Date: 1 June 2039

Review Date(s): June annually

Site Location: Tariki-A wellsite, 150 Mana Road, Ratapiko  
(Property owner: B & K Young)

Grid Reference (NZTM) 1716578E-5658186N

Catchment: Waitara

Tributary: Mako

*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. Before exercising the consent, the consent holder shall submit an "Injection Operation Management Plan." The plan shall include the operational details of the injection activities and identify the conditions that would trigger concerns about the integrity of the injection well, the receiving formation or overlying geological seals. The plan shall also detail the action(s) to be taken by the consent holder if trigger conditions are reached.
2. Before exercising the consent, the consent holder shall provide to the Chief Executive, Taranaki Regional Council for each well:
  - (a) a geological assessment of the environment in which the well is located, including the injection zone, the geological seals confining the injection zone and any associated faulting;
  - (b) details of the injection well design and its structural integrity; including but not limited to:
    - (i) the results of pressure testing of tubing and annulus;
    - (ii) an engineering evaluation of tubing and casing integrity, including burst pressures; and
    - (iii) an assessment of the current adequacy of the cement bond in providing zonal isolation
  - (c) an overall assessment of the suitability of the injection well for the proposed activity;
  - (d) details of how the ongoing integrity of the injection well will be monitored and maintained;
  - (e) confirmation of the depth to which fresh water resources, as defined in condition 8, are encountered below the site;
  - (f) a chemical assessment of the receiving formation water which confirms its Total Dissolved Solids (TDS) concentration, and also demonstrates that the mixing of formation and injection fluids will not result in any adverse effects on the receiving formation or the injection well; and
  - (g) maps showing any identified faults (active or inactive) within 2 km of the modelled injection plume and the potential for adverse environmental effects due to the presence of the identified faults.

*(Note: The information required by condition 2 may be included within the "Injection Operation Management Plan" required by condition 1).*



## Consent 10809-1.0

3. If the GeoNet seismic monitoring network records a seismic event within a 5 km radius of the Tariki-A wellsite (1716578E-5658186N) at a depth of less than 7 km below ground level that exceeds a summary magnitude of 3.0:
  - (a) if deep well injection is currently being undertaken it shall cease immediately and not recommence; or
  - (b) if a deep well injection has occurred within the previous 72 hours no further deep well injection shall occur into the Formation;
  - (c) the consent holder shall provide a report to the Chief Executive, Taranaki Regional Council on the likelihood of the seismic event being induced by the exercise of this consent; and
  - (d) deep well injection may only then continue once the Chief Executive, Taranaki Regional Council has considered the report and concluded that the environmental risk of recommencing injection is acceptable and has advised the consent holder accordingly.
4. There shall be no injection of any fluids after 1 June 2034.
5. 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.
6. The injected fluids shall be confined to the Tariki Sandstone member, at a minimum depth of 2,300 metres true vertical depth sub-sea.
7. The consent holder shall ensure that the discharge authorised by this consent does not result in the fracturing of the geological seals confining the injection zone.
8. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water). Useable fresh groundwater is defined as any groundwater having a TDS concentration of less than 1,000 mg/l.
9. Only the following types of fluids may be discharged:
  - (a) produced water; and
  - (b) natural gas, either produced from the Waihapa Production Station or pipeline-specification gas from the high pressure pipeline network.
10. Once the consent is exercised, the consent holder shall keep daily records of the:
  - (a) injection hours;
  - (b) volume of fluids discharged; and
  - (c) maximum and average injection pressure.
11. For each fluid arriving on site for discharge, the consent holder shall characterise the fluids by recording the following information:
  - (a) type of fluid (as listed in condition 9);
  - (b) source of fluid (site name and company); and
  - (c) an analysis of a representative sample of the fluid.

The analysis required by condition 11(c) above is not necessary if a sample of the same type of fluid, from the same source, has been taken, analysed and provided to the Chief Executive, Taranaki Regional Council within the previous 6 months.

## Consent 10809-1.0

12. If the analysis required by condition 11(c) above is not carried out in an International Accreditation New Zealand (IANZ) accredited laboratory, it shall be undertaken in accordance with a "Quality Assurance (QA) Plan" that has been certified by the Chief Executive, Taranaki Regional Council, as meeting the requirements of condition 14. The Taranaki Regional Council may also, at its discretion, carry out an audit of the consent holder's sampling and analysis regime to assess adherence to the QA plan.
13. The information required by conditions 10 and 11 above, for each calendar month, shall be provided to the Chief Executive, Taranaki Regional Council before the 28<sup>th</sup> day of the following month.
14. The consent holder shall undertake a programme of sampling and testing that monitors the effects of the exercise of this consent on fresh water resources within an Area of Review (AoR) to assess compliance with condition 8 (the 'Monitoring Programme'). The Monitoring Programme shall be designed to characterise local groundwater quality, and be submitted to the Chief Executive, Taranaki Regional Council, for certification before exercising the consent, and shall include:
  - (a) the location of sampling sites;
  - (b) well/bore construction details; and
  - (c) sampling frequency.

The AoR shall extend 1,000 m from the point of injection. It is a requirement that at least one suitable monitoring bore be located within 500 metres of the well head. If no suitable existing bores are available, it will be necessary for the Monitoring Programme to include installation of, and sampling from, a suitable bore. The bore would be of a depth, location and design determined after consultation with the Chief Executive, Taranaki Regional Council and installed in accordance with NZS 4411:2001.

15. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for:
  - (a) pH;
  - (b) conductivity;
  - (c) chloride;
  - (d) total petroleum hydrocarbons; and
  - (e) dissolved gases.

*Note: The samples required, under conditions 11 and 15, could be taken and analysed by the Council or other contracted party on behalf of the consent holder.*

16. All groundwater sampling and analysis shall be undertaken in accordance with a *Sampling and Analysis Plan*, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken. This Plan shall specify the use of standard protocols recognised to constitute good professional practice including quality control and assurance. An IANZ accredited laboratory shall be used for all sample analysis. Results shall be provided to the Chief Executive, Taranaki Regional Council within 30 days of sampling and shall include supporting quality control and assurance information.

*Note: The Sampling and Analysis Plan may be combined with the Monitoring Programme required by condition 14.*

## Consent 10809-1.0

17. The consent holder shall provide to the Chief Executive, Taranaki Regional Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period. Based on the data provided, the report shall also provide:
- (a) an assessment of injection well performance;
  - (b) details of the injection well design and its structural integrity; including but not limited to:
    - (i) an assessment of the current adequacy of the well's zonal isolation; and
    - (ii) the results of annual annulus pressure testing and/or continuous pressure monitoring
  - (c) results of the most recent five yearly casing inspection or engineering evaluation confirming the ongoing security of the casing;
  - (d) an assessment of the on-going integrity and isolation of the receiving formation;
  - (e) an updated injection modeling report, demonstrating the ability of the receiving formation to continue to accept additional fluid and an estimation of remaining storage capacity;
  - (f) an updated map showing any identified faults (active or inactive) within 2 km of the modelled injection plume; and
  - (g) the results of any seismic monitoring undertaken in compliance with condition 3 of the consent.
18. 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 each year, 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 5 February 2020

For and on behalf of  
Taranaki Regional Council

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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  
Consent Holder: Taranaki Ventures Limited

Decision Date: 7 July 2021

Commencement Date: 7 July 2021

**Conditions of Consent**

Consent Granted: To discharge produced water, well drilling fluids, well workover fluids and contaminated stormwater via deep well injection into the Mt Messenger Formation at the Copper Moki wellsite, at depths below 1400 mTVDSS for the purpose of water flooding

Expiry Date: 1 June 2040

Review Date(s): June annually

Site Location: Cooper Moki wellsite, Cheal Road, Ngaere  
(Property owner: RC & DM Howells)

Grid Reference (NZTM) 1715285E-5638921N

Catchment: Patea

Tributary: Ngaere

*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. Before exercising the consent, the consent holder shall submit an "Injection Operation Management Plan." The plan shall include the operational details of the injection activities and identify the conditions that would trigger concerns about the integrity of the injection well, the receiving formation or overlying geological seals. The plan shall also detail the action(s) to be taken by the consent holder if trigger conditions are reached.
2. Prior to any injection commencing from a well, or any change in the injection formation, the consent holder shall provide to the Chief Executive, Taranaki Regional Council for each well:
  - (a) a geological assessment of the environment in which the well is located, including the injection zone, the geological seals confining the injection zone and any associated faulting;
  - (b) details of the injection well design and its structural integrity; including but not limited to:
    - (i) the results of pressure testing of tubing and annulus;
    - (ii) an engineering evaluation of tubing and casing integrity, including burst pressures; and
    - (iii) an assessment of the current adequacy of the cement bond in providing zonal isolation.
  - (c) an overall assessment of the suitability of the injection well for the proposed activity;
  - (d) details of how the ongoing integrity of the injection well will be monitored and maintained;
  - (e) confirmation of the depth to which fresh water resources, as defined in condition 8, are encountered below the site;
  - (f) a chemical assessment of the receiving formation water which confirms its Total Dissolved Solids (TDS) concentration, and also demonstrates that the mixing of formation and injection fluids will not result in any adverse effects on the receiving formation or the injection well; and
  - (g) maps showing any identified faults (active or inactive) within 2 km of the modelled injection plume and the potential for adverse environmental effects due to the presence of the identified faults.

*(Note: The information required by condition 2 may be included within the "Injection Operation Management Plan" required by condition 1).*

## Consent 10927-1.0

3. If the GeoNet seismic monitoring network records a seismic event within a 5 km radius of the Copper Moki wellsite (1715285E-5638921N) at a depth of less than 7 km below ground level that exceeds a summary magnitude of 3.0:
  - (a) if deep well injection is currently being undertaken it shall cease immediately and not recommence; or
  - (b) if a deep well injection has within the previous 72 hours no further deep well injection shall occur into the Formation;
  - (c) the consent holder shall provide a report to the Chief Executive, Taranaki Regional Council on the likelihood of the seismic event being induced by the exercise of this consent; and
  - (d) deep well injection may only then continue once the Chief Executive, Taranaki Regional Council has considered the report and concluded that the environmental risk of recommencing injection is acceptable and has advised the consent holder accordingly.

*Note: This condition is very conservative and its main purpose is to provide public assurance.*

4. There shall be no injection of any fluids after 1 June 2035.
5. 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.
6. The injection of fluids shall be confined to the Mount Messenger Formation, and be injected at a minimum depth of 1400 metres true vertical depth subsea.
7. The consent holder shall ensure that the discharge authorised by this consent does not result in the fracturing of the geological seals confining the injection zone.
8. The consent holder shall ensure that the exercise of this consent does not result in contaminants reaching any useable fresh water (groundwater or surface water). Useable fresh groundwater is defined as any groundwater having a TDS concentration of less than 1,000 mg/l.
9. Only the following types of fluid may be discharged:
  - (a) produced water;
  - (b) well workover fluids, including hydraulic fracturing return fluids;
  - (c) well drilling fluids;
  - (d) production sludges;
  - (e) contaminated stormwater; and
  - (f) other fluids in accordance with condition 10 below.
10. The fluids discharged under this consent shall only be those listed in condition 9(a) to 9(e) above, and other fluids that:
  - (a) can reasonably be expected to be used in petrochemical well maintenance and development in accordance with industry best practice;
  - (b) have environmental effects that are no more adverse than those listed in 9(a) to 9(e) above;
  - (c) have been certified by the Chief Executive, Taranaki Regional Council as complying with 9(a) to 9(e) above; and
  - (d) have been the subject of a specific request for certification, in accordance with 9(a) to 9(e) above, that includes details of the proposed contaminant.

## Consent 10927-1.0

11. From the date of the first discharge the consent holder shall keep a record of the:
  - (a) well into which the discharge occurred;
  - (b) hours of injection each day;
  - (c) volume of fluid discharged each day; and
  - (d) maximum and average injection pressure each day.
  
12. For each waste stream arriving on site for discharge, the consent holder shall characterise the fluids by recording the following information:
  - (a) type of fluid (as listed in condition 9);
  - (b) source of fluid (site name and company);
  - (c) an analysis of a representative sample of the fluid for:
    - (i) pH;
    - (ii) conductivity;
    - (iii) suspended solids concentration;
    - (iv) temperature;
    - (v) salinity;
    - (vi) chloride concentration; and
    - (vii) total hydrocarbon concentration.

The analysis required by condition 12(c) above is not necessary if a sample of the same type of fluid, from the same source, has been taken, analysed and provided to the Chief Executive, Taranaki Regional Council within the previous 6 months.

13. If the analysis required by condition 12(c) above is not carried out in an International Accreditation New Zealand accredited laboratory, it shall be undertaken in accordance with a "Quality Assurance (QA) Plan" that has been certified by the Chief Executive, Taranaki Regional Council, as meeting the requirements of condition 12. The Council may also, at its discretion, carry out an audit of the consent holder's sampling and analysis regime to assess adherence to the QA plan.
  
14. The information required by conditions 11 and 12 above, for each calendar month, shall be provided to the Chief Executive, Taranaki Regional Council before the 28th day of the following month.
  
15. The consent holder shall undertake a programme of sampling and testing that monitors the effects of the exercise of this consent on fresh water resources within an Area of Review (AoR) to assess compliance with condition 8 (the 'Monitoring Programme'). The Monitoring Programme shall be designed to characterise local groundwater quality, and be submitted to the Chief Executive, Taranaki Regional Council, for certification before the exercising of this consent, and shall include:
  - (a) the location of sampling sites;
  - (b) well/bore construction details; and
  - (c) sampling frequency.

The AoR shall extend 1,000 metres from the point of injection. It is a requirement that at least one suitable monitoring bore be located within 500 metres of the well head. If no suitable existing bores are available, it will be necessary for the Monitoring Programme to include installation of, and sampling from, a suitable bore. The bore would be of a depth, location and design determined after consultation with the Chief Executive, Taranaki Regional Council and installed in accordance with NZS 4411:2001. The bore shall be completed no later than 6 months after granting this consent.



## Consent 10927-1.0

16. All groundwater samples taken for monitoring purposes shall be taken in accordance with recognised field procedures and analysed for:

- (a) pH;
- (b) conductivity;
- (c) chloride; and
- (d) total petroleum hydrocarbons.

*Note: The samples required, under conditions 15 and 16, could be taken and analysed by the Taranaki Regional Council or other contracted party on behalf of the consent holder.*

17. All groundwater sampling and analysis shall be undertaken in accordance with a *Sampling and Analysis Plan*, which shall be submitted to the Chief Executive, Taranaki Regional Council for review and certification before the first sampling is undertaken. This Plan shall specify the use of standard protocols recognised to constitute good professional practice including quality control and assurance. An IANZ accredited laboratory shall be used for all sample analysis. Results shall be provided to the Chief Executive, Taranaki Regional Council within 30 days of sampling and shall include supporting quality control and assurance information.

*Note: The Sampling and Analysis Plan may be combined with the Monitoring Programme required by condition 15.*

18. The consent holder shall provide to the Chief Executive, Taranaki Regional Council, before 31 August each year, a summary of all data collected and a report detailing compliance with consent conditions over the previous 1 July to 30 June period. Based on the data provided, the report shall also provide:

- (a) an assessment of injection well performance;
- (b) an assessment of the on-going integrity and isolation of the wellbore;
- (c) an assessment of the on-going integrity and isolation of the receiving formation; and
- (d) an updated injection modelling report, demonstrating the ability of the receiving formation to continue to accept additional waste fluids and an estimation of remaining storage capacity.

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 annually, 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 7 July 2021

For and on behalf of  
Taranaki Regional Council

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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 actual or likely effects 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 management 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 and 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.