

IN THE MATTER of the Fast-track Approvals Act 2024 (the Act)

AND

IN THE MATTER of an application made under the Fast-track
Approvals Act 2024 by Matakanui Gold
Limited (Santana Minerals)

MEMORANDUM OF COUNSEL ON BEHALF OF KĀTI HUIRAPA RŪNAKA KI
PUKETERAKI, TE RŪNANGA O MOERAKI, TE RŪNAKA O ŌTĀKOU, AND
HOKONUI RŪNANGA (KĀ RŪNAKA)

5 June 2026



HOLM | MAJUREY

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TĒNĀ, E TE ROOPU TOHUNGA

1. We refer to Minute 30 of the Expert Panel (27 May 2026).
2. Kā Rūnaka anticipates the following attendances at the hearings set out in paragraph [2] of that minute:

Hearing	Attendance
Landscape	Dr Alayna Rā (landscape expert) Mike Holm; Nicole Buxeda (counsel)
Heritage	No attendance
Ecology	Matt Dale (ecology expert) Mike Holm; Nicole Buxeda (counsel)
Water	Mike Holm; Nicole Buxeda (counsel)
Geotech	Mark Pizey (mine engineering and environmental management) Mike Holm; Nicole Buxeda (counsel)
Economics	Mike Holm; Nicole Buxeda (counsel)
Planning	Mike Holm; Nicole Buxeda (counsel)

3. Attendance is planned to be remote for all attendees appearing on behalf of Kā Rūnaka.
4. We note paragraphs 12(e) and (f) of Minute 30. Accordingly counsel does not anticipate asking any questions in cross examination, unless the answer to any questioning gives rise to the need to seek limited clarification. We anticipate that we will seek the leave of the Panel at that time to ask limited questions necessary for clarification only.

DATE: 5 June 2026



Mike Holm / Nicole Buxeda

Counsel for Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki, Te Rūnaka o Ōtākou, and Hokonui Rūnanga