

Before an Expert Consenting Panel

Under the

Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by Matakanui Gold Limited to establish, operate, rehabilitate and ultimately close an open pit and underground gold mining operation known as the Bendigo-Ophir Gold Project

Memorandum of Counsel on behalf of **Matakanui Gold Limited** in response to Hearing Procedures

Dated: 23 April 2026

Lane Neave

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MAY IT PLEASE THE EXPERT PANEL

1. This Memorandum of Counsel is filed on behalf of Matakanui Gold Limited (**Matakanui Gold**) in accordance with the Expert Panel's direction at paragraph 9 of the Hearing Procedures dated 20 April 2026.
2. Matakanui Gold confirms it will attend:
 - (a) Hearing of Kā Rūnaka on 28 April 2026 at Ōtākou Marae; and
 - (b) Hearing of Invited Parties on 29-30 April 2026 in Cromwell.

(together, **Hearings**)
3. The following 8 attendees will be present at the Hearings on behalf of Matakanui Gold:
 - (a) Damian Spring (Matakanui Gold representative – CEO, Santana Minerals and Matakanui Gold);
 - (b) Peter Cook (Matakanui Gold representative – Chairman, Santana Minerals Limited and Matakanui Gold);
 - (c) Cheryl Low (Matakanui Gold representative – Environment Manager Matakanui Gold);
 - (d) Joshua Leckie (Legal Counsel – Lane Neave);
 - (e) Mia Turner (Legal Counsel – Lane Neave);
 - (f) Mark Chrisp (Planning - Mitchell Daysh);
 - (g) Nicolai Berry (Planning - Mitchell Daysh); and
 - (h) Mahanga Maru (Director, Maru Consulting) attending at Ōtākou Marae only.



Joshua Leckie / Sarah Anderton / Mia Turner
Counsel for Matakanui Gold Limited