

**IN THE MATTER**

of an application made under the Fast-Track Approvals Act 2024 by Matakanui Gold Limited (Santana Minerals)

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**MEMORANDUM OF COUNSEL FOR KĀTI HUIRAPA RŪNAKA KI  
PUKETERAKI, TE RŪNANGA O MOERAKI, TE RŪNAKA O ŌTĀKOU, AND  
HOKONUI RŪNANGA**

**24 April 2026**

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 **HOLM | MAJUREY**

Mike Holm/Nicole Buxeda  
PO Box 1585  
Shortland Street  
AUCKLAND 1140

Solicitor on the record  
**Contact solicitor**

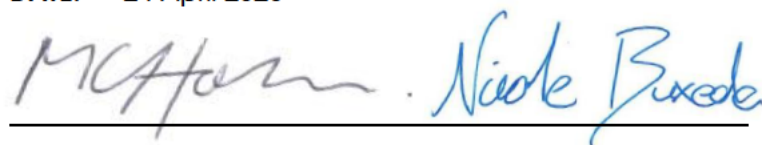
Mike Holm  
Nicole Buxeda


**TĒNĀ KOUTOU**

1. In the Applicant's legal submission, received Monday 20 April 2026, statements were made regarding the applicability of Ngāi Tahu's Treaty settlement, and the status of the apology. These submissions rejected any connection between section 7 and the Applicant.
2. This is a key issue for Kā Rūnaka, and for the Panel.
3. Preliminary feedback from the Chair suggested that this evidence arose in relation to a legal issue. Counsel submits this evidence addresses issues at the heart of the substance of Treaty settlements.
4. Such a serious, fundamental view of the relevance of the Treaty settlement in the context of the Fast-track Approvals Act 2024 and of the status of the apology, needs to be urgently addressed in a way which still leaves open the opportunity for the Applicant to respond.
5. In the interests of providing the Panel with the best information to make their decision possible, Counsel respectfully seek leave from the Panel for permission to file expert evidence on this topic by Mike Dreaver. Mr Dreaver is a highly respected Treaty expert who is in the position to file independent expert evidence on this important matter at short notice.
6. It is proposed that Mr Dreaver attend the hearing on 28 April 2026 and present to the Panel and answer questions.
7. We do not consider that this will raise any issues of prejudice for the Applicant, as they will be afforded the opportunity to respond to this information, either on 28 April 2026 or at a later date.

**DATE:** 24 April 2026

Handwritten signature in blue ink, appearing to read "Mike Holm . Nicole Buxeda".

**Mike Holm / Nicole Buxeda**

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