

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 - Alternative
Access Route**

Dated: 5 October 2026

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lane neave.

MAY IT PLEASE THE EXPERT PANEL

1. In its response to Minute 54 Matakanui Gold Limited (**Matakanui Gold**) proposed additional conditions to provide an alternative long term public vehicle access route in the event that the vesting process for Ardgour Rise has not been completed by Year 25.¹
2. Matakanui Gold proposes that this alternative long term public vehicle access is provided through the road described as “*upgraded/new four-wheel drive track*” in Shepherds Valley shown on the existing Landscape Closure Plan (**New Alternative Route**).
3. The New Alternative Route was described in the 2 October 2026 response with reference to the Landscape Closure Plan. This Memorandum of Counsel is filed to attach that plan clearly showing the New Alternative Route.
4. Matakanui Gold confirm that the route marked in green in **Appendix 1** is the New Alternative Route referred to in its response to Minute 54.

Dated 5 October 2026



Joshua Leckie / Mia Turner
Counsel for Matakanui Gold Limited

¹ Memorandum of Counsel on behalf of Matakanui Gold Limited, Response to Minute 54, 2 October 2026 at [37].

Appendix 1

BENDIGO-STATION

LEGEND

- ① **SOIL STOCKPILE**
Remove stockpiles and reinstate original land form.
Landcover to support ecological outcomes.
- ② **HAUL ROADS**
Shallow-off batters and form wedge of soil/ rock to support rehabilitation.
Remaining high cut faces will remain as stable rock.
- ③ **THOMSON GORGE ROAD CLOSURE**
Car parking with walking access where shown on plan.
- Existing Thomson Gorge Road retained
- Upgraded and realigned Ardour Rise Road
- Existing 4WD tracks
- Upgraded / new 4WD tracks
- Recreation route for walking access
- Outstanding Natural Landscape (ONL)
- Existing waterways
- Permanent clean water diversion channel
- Permanent diverted mine water channel
- Known springs/ seepages

BOFFA MISKELL

BENDIGO-OPHIR MINE

Date: 21 July 2025

Plan prepared for Santana Minerals by Boffa Miskell Limited

Project Manager: Rhys.Girvan@boffamiskell.co.nz | Drawn: EWo | Checked: RGJ

0 50 300m
1:8,000 @ A0
1:16,000 @ A2

Date: 21 July 2025

0 50 300m
1:8,000 @ A0
1:16,000 @ A2

