

Under the **FAST-TRACK APPROVALS ACT 2024**

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 FOR OTAGO REGIONAL COUNCIL SEEKING
LEAVE TO CROSS-EXAMINE GEOTECH WITNESSES**

11 June 2026

BUDDLE FINDLAY

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MAY IT PLEASE THE PANEL:

1. Counsel for Otago Regional Council (**ORC**) respectfully seeks leave under section 58(1)(e) of the Fast-track Approvals Act 2024 to cross-examine witnesses at the concurrent hearing on geotechnical matters on 16 June 2026.
2. Counsel seeks leave to cross-examine Peter O'Bryan, Eric Torvelainen, Dr Trevor Matuschka, and Dr Paul Weber on matters relating to the New Zealand Dam Safety Guidelines and the Global Industry Standard on Tailings Management.
3. Further expert conferencing relating to geotechnical matters is due to take place on 12 June 2026. Counsel may seek leave to question other witnesses on matters arising from the resulting joint witness statement.

Dated this 11th day of June 2026



Dave Randal
Counsel for Otago Regional Council