

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

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**MEMORANDUM OF COUNSEL FOR OTAGO REGIONAL COUNCIL  
SEEKING LEAVE TO CROSS-EXAMINE PLANNING WITNESSES**

15 June 2026

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**BUDDLE FINDLAY**

Barristers and Solicitors  
Wellington

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**MAY IT PLEASE THE PANEL:**

1. Counsel for Otago Regional Council (**ORC**) respectfully seeks leave from the Expert Panel under section 58(1)(e) of the Fast-track Approvals Act 2024 to cross-examine witnesses at the concurrent hearing on planning matters, to be held on 18 June 2026.
2. Leave is sought to cross-examine Mark Chrisp and Nicolai Berry in respect of:
  - (a) approval / certification of management plans;
  - (b) consent duration; and
  - (c) long-term management of effects.

**Dated** this 15<sup>th</sup> day of June 2026



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**Dave Randal**  
Counsel for Otago Regional Council