

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 responding to
Request for Information 12**

Dated: 23 September 2026

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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 response to the Expert Panel's Request for Information 12 (**RFI 12**).
2. RFI 12 sought additional information relating to seepage, lizard and spring annual compensation be provided by 23 September 2026.
3. This memorandum accompanies the following material responding to RFI 12:
 - (a) A memorandum prepared by Engineering Geology Limited, Hydro Geochem Group, Kōmanawa Solutions Limited and Santana Minerals Limited responding to the water/seepage matters.
 - (b) A memorandum prepared by Dr Baber, Dr Ussher and Mr Barber addressing lizard compensation.
 - (c) A memorandum prepared by Santana Minerals Limited, Dr Simcock and Emeritus Professor David Norton addressing cushionfield and spring annual compensation.
4. To the extent that the recommendations of the relevant experts in the response to RFI 12 necessitates further targeted amendments to the conditions filed on 14 September 2026, those amendments will be incorporated into a final condition set to be filed with Matakanui Gold's reply legal submissions on 28 September 2026.
5. In accordance with the Panel's directions in Minute 53, the documents filed on behalf of Matakanui Gold also include Mr Burgess' response to Dr Morgan's supplementary statement.

Dated 23 September 2026



Joshua Leckie / Mia Turner
Counsel for Matakanui Gold Limited