

**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 seeking leave  
to cross examine under Section  
58(1)(e)**

Dated: 11 June 2026

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**Lane Neave**  
Level 1, 2 Memorial Street  
PO Box 7348  
Queenstown  
Solicitor Acting: Joshua Leckie/Charlotte Coyle/Mia Turner  
Email: [joshua.leckie@laneneave.co.nz](mailto:joshua.leckie@laneneave.co.nz)/  
[charlotte.coyle@laneneave.co.nz](mailto:charlotte.coyle@laneneave.co.nz)/[mia.turner@laneneave.co.nz](mailto:mia.turner@laneneave.co.nz)  
Phone: 03 409 0321

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## MAY IT PLEASE THE EXPERT PANEL

### Introduction

1. This Memorandum of Counsel is filed on behalf of Matakanui Gold Limited (**Matakanui Gold**) seeking leave from the Expert Panel under Section 58(1)(e) of the Fast-track Approvals Act 2024 to cross examine at the water hearing on 15 June 2026.
2. Counsel proposes to cross examine only to the extent that the matters outlined below are not addressed through questions from the Expert Panel during the hearing.
3. Given that, this request is made on a conservative basis and may not ultimately be required.
4. Counsel seeks leave from the Expert Panel to conduct focused cross examination on the following topics:
  - (a) baseline data;
  - (b) water and load balance model;
  - (c) groundwater/seepage;
  - (d) water treatment; and
  - (e) effects on receiving aquatic environment.

Dated 11 June 2026



**Joshua Leckie / Charlotte Coyle / Mia Turner**  
**Counsel for Matakanui Gold Limited**