Greymouth Petroleum
Acquisition Company Ltd
Kaimiro Production Station
Monitoring Programme
Annual Report
2015-2016

Technical Report 2016-18

ISSN: 1178-1467 (Online) Document: 1699313 (Word) Document: 1777949 (Pdf) Taranaki Regional Council Private Bag 713 STRATFORD

Executive summary

Greymouth Petroleum Acquisition Company Limited (GPL) operates the Kaimiro Production Station located at Inglewood, in the Waiongana catchment, and the associated Ngatoro-A and Ngatoro-B producing wellsites at Inglewood, in the Waitara catchment. This report for the period July 2015 to June 2016 describes the monitoring programme implemented by the Taranaki Regional Council (the Council) to assess GPL's environmental performance during the period under review. The report also details the results of the monitoring undertaken and assesses the environmental effects of GPL's activities.

GPL holds seven resource consents for production activities at the three sites, which include a total of 110 conditions setting out the requirements that they must satisfy. GPL holds one consent to allow it to take and use water, three consents to discharge stormwater and treated wastewater into the Mangaoraka and Ngatoro Streams, and three consents to discharge emissions into the air.

During the monitoring period, GPL demonstrated an overall high level of environmental performance.

The Council's monitoring programme included five inspections of the Kaimiro Production Station, five inspections at the Ngatoro wellsites, an annual inspection of the associated wellsites, six water samples collected for physicochemical analysis, two biological surveys of receiving waters and two ambient air quality surveys.

Results of samples collected of the discharge and receiving waters were within the limits prescribed by the consents and, along with the results of biomonitoring carried out in the Mangaoraka Stream, indicated that the discharges were not having a significant adverse effect on the downstream water quality.

There were no adverse effects on the environment resulting from the exercise of the air discharge consents. The ambient air quality monitoring at the Kaimiro Production Station showed that levels of carbon monoxide, combustible gases, PM10 particulates and nitrogen oxides were all below levels of concern at the time of sampling. No offensive or objectionable odours were detected beyond the boundary during inspections and there were no complaints in relation to air emissions from the site.

During the period under review, GPL demonstrated an overall high level of both environmental performance and administrative compliance with the resource consents. There were no unauthorised incidents recorded by the Council in relation to GPL's activities. The Kaimiro Production Station and associated wellsites were well managed and maintained.

For reference, in the 2015-2016 year, 71% of consent holders in Taranaki monitored through tailored compliance monitoring programmes achieved a high level of environmental performance and compliance with their consents, while another 24% demonstrated a good level of environmental performance and compliance with their consents.

In terms of overall environmental and compliance performance by the consent holder over the last several years, this report shows that the consent holder's performance remains at a high level.

This report includes recommendations for the 2016-2017 year.

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1. Introduction

1.1 Compliance monitoring programme reports and the Resource Management Act 1991

1.1.1 Introduction

This report is for the period July 2015 to June 2016 by the Taranaki Regional Council (the Council) on the monitoring programme associated with resource consents held by Greymouth Petroleum Acquisition Company Ltd (GPL). GPL operates the Kaimiro Production Station situated on Upland Road at Inglewood, in the Waiongana catchment. GPL also operates the Ngatoro-A and Ngatoro-B producing wellsites. The Ngatoro-A wellsite is located on Upper Dudley Road and the Ngatoro-B wellsite is located on Bedford Road. Both of these sites are at Inglewood, in the Waitara catchment. A further 20 wellsites are monitored annually in conjunction with the Kaimiro Production Station.

The report includes the results and findings of the monitoring programme implemented by the Council in respect of the consents held by GPL that relate to abstractions and discharges of water within the Waiongana and Waitara catchments, and the air discharge permits held to cover emissions to air from the sites.

One of the intents of the *Resource Management Act 1991* (RMA) is that environmental management should be integrated across all media, so that a consent holder's use of water, air, and land should be considered from a single comprehensive environmental perspective. Accordingly, the Council generally implements integrated environmental monitoring programmes and reports the results of the programmes jointly. This report discusses the environmental effects of GPL's use of water, land and air, and is the twelfth combined annual report by the Council for GPL.

1.1.2 Structure of this report

Section 1 of this report is a background section. It sets out general information about:

- consent compliance monitoring under the RMA and the Council's obligations;
- the Council's approach to monitoring sites though annual programmes;
- the resource consents held by GPL in the Waiongana and Waitara catchments;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted at the Kaimiro and Ngatoro sites.

Section 2 presents the results of monitoring during the period under review, including scientific and technical data.

Section 3 discusses the results, their interpretations, and their significance for the environment.

Section 4 presents recommendations to be implemented in the 2016-2017 monitoring year.

A glossary of common abbreviations and scientific terms, and a bibliography, are presented at the end of the report.

1.1.3 The Resource Management Act 1991 and monitoring

The RMA primarily addresses environmental 'effects' which are defined as positive or adverse, temporary or permanent, past, present or future, or cumulative. Effects may arise in relation to:

- (a) the neighbourhood or the wider community around an activity, and may include cultural and social-economic effects;
- (b) physical effects on the locality, including landscape, amenity and visual effects;
- (c) ecosystems, including effects on plants, animals, or habitats, whether aquatic or terrestrial;
- (d) natural and physical resources having special significance (for example recreational, cultural, or aesthetic); and
- (e) risks to the neighbourhood or environment.

In drafting and reviewing conditions on discharge permits, and in implementing monitoring programmes, the Council is recognising the comprehensive meaning of 'effects' inasmuch as is appropriate for each activity. Monitoring programmes are not only based on existing permit conditions, but also on the obligations of the RMA to assess the effects of the exercise of consents. In accordance with Section 35 of the RMA, the Council undertakes compliance monitoring for consents and rules in regional plans, and maintains an overview of the performance of resource users and consent holders. Compliance monitoring, including both activity and impact monitoring, enables the Council to continually re-evaluate its approach and that of consent holders to resource management and, ultimately, through the refinement of methods and considered responsible resource utilisation, to move closer to achieving sustainable development of the region's resources.

1.1.4 Evaluation of environmental and administrative performance

Besides discussing the various details of the performance and extent of compliance by GPL, this report also assigns them a rating for their environmental and administrative performance during the period under review.

Environmental performance is concerned with <u>actual or likely effects</u> on the receiving environment from the activities during the monitoring year. **Administrative performance** is concerned with GPL's approach to demonstrating consent compliance <u>in site operations and management</u> including the timely provision of information to Council (such as contingency plans and water take data) in accordance with consent conditions.

Events that were beyond the control of the consent holder <u>and</u> unforeseeable (that is a defence under the provisions of the RMA can be established) may be excluded with regard to the performance rating applied. For example loss of data due to a flood destroying deployed field equipment.

The categories used by the Council for this monitoring period, and their interpretation, are as follows:

Environmental Performance

- High: No or inconsequential (short-term duration, less than minor in severity) breaches of consent or regional plan parameters resulting from the activity; no adverse effects of significance noted or likely in the receiving environment. The Council did not record any verified unauthorised incidents involving significant environmental impacts and was not obliged to issue any abatement notices or infringement notices in relation to such impacts.
- Good: Likely or actual adverse effects of activities on the receiving environment were negligible or minor at most. There were some such issues noted during monitoring, from self reports, or in response to unauthorised incident reports, but these items were not critical, and follow-up inspections showed they have been dealt with. These minor issues were resolved positively, co-operatively, and quickly. The Council was not obliged to issue any abatement notices or infringement notices in relation to the minor non-compliant effects; however abatement notices may have been issued to mitigate an identified potential for an environmental effect to occur.

For example:

- High suspended solid values recorded in discharge samples, however the discharge was to land or to receiving waters that were in high flow at the time:
- Strong odour beyond boundary but no residential properties or other recipient nearby.
- Improvement required: Likely or actual adverse effects of activities on the receiving environment were more than minor, but not substantial. There were some issues noted during monitoring, from self reports, or in response to unauthorised incident reports. Cumulative adverse effects of a persistent minor non-compliant activity could elevate a minor issue to this level. Abatement notices and infringement notices may have been issued in respect of effects.
- **Poor:** Likely or actual adverse effects of activities on the receiving environment were significant. There were some items noted during monitoring, from self reports, or in response to unauthorised incident reports. Cumulative adverse effects of a persistent moderate non-compliant activity could elevate an 'improvement required' issue to this level. Typically there were grounds for either a prosecution or an infringement notice in respect of effects.

Administrative performance

 High: The administrative requirements of the resource consents were met, or any failure to do this had trivial consequences and were addressed promptly and cooperatively.

- Good: Perhaps some administrative requirements of the resource consents were not met at a particular time, however this was addressed without repeated interventions from the Council staff. Alternatively adequate reason was provided for matters such as the no or late provision of information, interpretation of 'best practical option' for avoiding potential effects, etc.
- Improvement required: Repeated interventions to meet the administrative requirements of the resource consents were made by Council staff. These matters took some time to resolve, or remained unresolved at the end of the period under review. The Council may have issued an abatement notice to attain compliance.
- Poor: Material failings to meet the administrative requirements of the resource consents. Significant intervention by the Council was required. Typically there were grounds for an infringement notice.

For reference, in the 2015-2016 year, 71% of consent holders in Taranaki monitored through tailored compliance monitoring programmes achieved a high level of environmental performance and compliance with their consents, while another 24% demonstrated a good level of environmental performance and compliance with their consents.

1.2 Process description

1.2.1 Kaimiro Production Station

The Kaimiro Production Station was commissioned in 1985. The production station separates and treats oil and gas from wells in the Kaimiro and Ngatoro fields. Oil is piped to the Omata tank farm and gas is piped into the national grid. Wellsites associated with the Kaimiro Production Station are as follows: Kaimiro: B, C, D, F, G, H, J, K, L, M, O; Ngatoro: A, B, C, D, E, F; Goldie; Windsor and Surrey.

The site's BTEX vapour incinerator was replaced in October 2007 with a more efficient unit. A new gas compressor was commissioned in June 2008 and upgrades made to all existing compressor PLC control systems. These measures have resulted in a significant sustained improvement in plant energy efficiency at the Kaimiro site.



Photo 1 Kaimiro Production Station

Stormwater from the Kaimiro Production Station passes through a separator system and a skimmer pit before discharging to an unnamed tributary of the Mangaoraka Stream. All chemical storage is contained within bunds and isolated from the stormwater system.

1.2.2 Ngatoro producing wellsites



Photo 2 Ngatoro-A wellsite

Ngatoro-A (Photo 2) was established in July 1992. The site consists of five wells (Ngatoro-1, -6, -7, -8, and -14), storage facilities for recovered oil and a bunded earth flare pit. In July 1999 the north-east skimmer pit at the site was decommissioned. The south-west skimmer pit now receives all treated stormwater, treated production water and treated wastewater from oil well drilling and production operations. Recovered oil and gas is piped off site to the Kaimiro Production Station, consequently flaring has been reduced.



Photo 3 Ngatoro-B wellsite

The Ngatoro-B site (Photo 3) was established in 1991 and consists of four wells (Ngatoro-2, -5, -9 and -11), storage facilities for recovered oil and a bunded earth flare pit. Produced water is piped to Kaimiro and re-injected. There are two sumps with a combined capacity of 1,290 m³ to which stormwater and wastewater are directed, and a skimmer pit with a 243 m³ capacity is used for treatment prior to discharge to an unnamed tributary of the Ngatoro Stream. Produced gas and liquids are piped to the Kaimiro Production Station for processing.

2. Kaimiro Production Station

2.1 Resource consents

2.1.1 Water abstraction permit

Section 14 of the RMA stipulates that no person may take, use, dam or divert any water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or it falls within some particular categories set out in Section 14.

GPL holds water abstraction permit **5384-2** to take groundwater from the Matemateaonga Formation for use in enhanced hydrocarbon recovery activities at the Kaimiro-O wellsite. This permit was first issued by the Council on 18 September 1998 under Section 87(e) of the RMA. It was renewed on 24 July 2014 and is due to expire on 1 June 2032.

Condition 1 sets limits on the volume and rate of abstraction.

Condition 2 requires that the bore is labelled.

Conditions 3 to 7 deal with installation of a water meter and datalogger, recording and provision of data, accuracy of the equipment, access, and repairs and maintenance.

Condition 8 requires the consent holder to adopt the best practicable option to prevent or minimise adverse environmental effects.

Conditions 9 and 10 deal with lapse and review of the consent.

The permit is attached to this report in Appendix I.

2.1.2 Water discharge permit

Section 15(1)(a) of the RMA stipulates that no person may discharge any contaminant into water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or by national regulations.

GPL holds water discharge permit **1334-3** to cover discharge of treated stormwater from the Kaimiro Production Station into an unnamed tributary of the Mangaoraka Stream in the Waiongana Catchment. This permit was issued by the Council on 10 January 2002 under Section 87(e) of the RMA. It was transferred to GPL on 10 April 2002. An application for change of consent conditions was approved on 5 September 2012 to remove three redundant conditions relating to operational and management planning. A further change of consent was approved on 8 April 2014 to increase the catchment area, move the discharge point and increase the discharge chloride limit to 230 g/m^3 . It is due to expire on 1 June 2020.

Condition 1 requires the consent holder to adopt the best practicable option to prevent or minimise adverse effects of the discharge on any waterbody.

Condition 2 imposes a limit on the stormwater catchment size.

Condition 3 requires site specific details relating to contingency planning for the site.

Condition 4 requires all stormwater be directed through a stormwater treatment system.

Condition 5 requires that design, management and maintenance of the stormwater system be undertaken in accordance with information submitted in the application.

Condition 6 requires that hazardous substance storage areas be bunded with drainage to appropriate recovery systems, and not to the stormwater catchment.

Conditions 7, 8 and 9 impose limits on contaminants in the discharge, and stipulate effects the discharge shall not give rise to in the unnamed tributary of the Mangaoraka Stream.

Condition 10 requires that the consent holder prepare and annually maintain a contingency plan in relation to spillages at the site.

Condition 11 requires that the Council be advised of reinstatement of the site.

Condition 12 provides for review of the consent.

The permit is attached to this report in Appendix I.

2.1.3 Air discharge pemit

Section 15(1)(c) of the RMA stipulates that no person may discharge any contaminant from any industrial or trade premises into air, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations.

GPL holds air discharge permit **4048-3** to cover discharge of emissions into the air from the flaring of hydrocarbons arising from hydrocarbon production and hydrocarbon processing operations together with miscellaneous emissions at the Kaimiro Production Station. This permit was first issued by the Council on 20 June 1995 under Section 87(e) of the RMA. It was transferred to GPL on 10 April 2002 and renewed on 10 January 2008. The current permit covers emissions from Kaimiro Production Station only and is due to expire on 1 June 2026. Separate air discharge permits were issued for the associated wellsites.

Condition 1 limits the duration of flaring during well testing.

Conditions 2, 3 and 4 specify the requirements for notification prior to flaring and before undertaking alterations to equipment or processes which may substantially alter the nature or quantity of the discharge.

Conditions 5 to 10 stipulate the required equipment and processes for undertaking flaring, and limit the substances which may be flared to gases from the well stream.

Conditions 11 to 16 stipulate limits on contaminants and effects from flaring and any other emissions from the production station.

Conditions 17 to 21 specify the requirements for the recording and reporting of information relating to flaring and the details of any measures undertaken to reduce or mitigate emissions from the production station.

Condition 22 provides for review of the consent.

The permit is attached to this report in Appendix I.

2.2 Monitoring programme

2.2.1 Introduction

Section 35 of the RMA sets obligations upon the Council to gather information, monitor and conduct research on the exercise of resource consents within the Taranaki region. The Council is also required to assess the effects arising from the exercising of these consents and report upon them.

The Council may therefore make and record measurements of physical and chemical parameters, take samples for analysis, carry out surveys and inspections, conduct investigations and seek information from consent holders.

The monitoring programme for the Kaimiro Production Station site consisted of four primary components.

2.2.2 Programme liaison and management

There is generally a significant investment of time and resources by the Council in:

- ongoing liaison with resource consent holders over consent conditions and their interpretation and application;
- in discussion over monitoring requirements;
- preparation for any reviews;
- renewals;
- new consents;
- advice on the Council's environmental management strategies and content of regional plans; and
- consultation on associated matters.

2.2.3 Site inspections

The Kaimiro Production Station site was visited six times during the monitoring period. With regard to consents for the abstraction of or discharge to water, the main points of interest were plant processes with potential or actual discharges to receiving watercourses, including contaminated stormwater and process wastewaters. Air inspections focused on plant processes with associated actual and potential emission sources and characteristics, including potential odour, dust, noxious or offensive emissions. Sources of data being collected by GPL were identified and accessed, so that performance in respect of operation, internal monitoring, and supervision could be reviewed by the Council. The neighbourhood was surveyed for environmental effects.

2.2.4 Chemical sampling

The Council undertook sampling of both the discharges from the site and the water quality upstream of the discharge point and downstream of the mixing zone.

The treated stormwater discharge from the production station was sampled on one occasion, along with two sites in the unnamed tributary of the Mangaoraka Stream. Samples were analysed for hydrocarbons, suspended solids, conductivity, pH, turbidity and chloride.

The Council also undertook sampling of the ambient air quality outside the boundary of the site. Passive absorption discs were placed at two sites on one occasion to measure nitrogen oxides. A multi-gas meter was also deployed on one occasion in the vicinity of the plant, with monitoring consisting of continuous measurements of gas concentrations for the gases of interest (carbon monoxide and combustible gases).

2.2.5 Biomonitoring surveys

Two biological surveys were performed in the unnamed tributary of the Mangaoraka Stream to determine whether or not the discharge of treated stormwater from the site has had a detrimental effect upon the communities of the stream.

2.3 Results: water

2.3.1 Inspections

Five inspections were carried out at the Kaimiro Production Station and associated sites in the 2015-2016 year. The following was found during the inspections:

31 July 2015

The Kaimiro Production Station site was neat and tidy during the inspection. Ring drains and bunds were secure.

14 August 2015

The site was observed to be neat and tidy after recent heavy rain. Ring drains, bunds, and stormwater treatment systems were all secure and no effects from any stormwater discharge were noted in the skimmer pits or receiving water. No flaring was being undertaken.

11 November 2015

No flaring was being undertaken at the time of the inspection, with no drilling muds or other contaminants observed within the pits. All stormwater systems were operating effectively, and no impact on the receiving waters was noted. Storage areas for hazardous materials and drums were either bunded or double skinned.

16 February 2016

The site was observed to be neat and tidy. The skimmer pits were clear of contaminants, although discoloured by naturally occurring iron oxide. Flaring was not being undertaken at the time of the inspection and both flare pits were clear of any produced water or well additives.

26 May 2016

The inspection was undertaken during heavy rain, following a prolonged period of heavy rainfall. The stormwater was being directed through the treatment system as per resource consent conditions. Skimmer pits were clear of contaminants and bunds were provided around drum storage areas. No flaring was being undertaken, and no off site odours were noted.

2.3.2 Results of discharge monitoring



Figure 1 Water quality monitoring sites in relation to the Kaimiro Production Station

Sampling of the discharge from the Kaimiro Production Station was undertaken once during the 2015-2016 monitoring period, on 23 June 2016. Table 1 below presents the results along with a summary of previous results and limits stipulated by consent 1334-3. The sampling sites are shown in Figure 1.

Table 1 Physicochemical results for discharge from the Kaimiro Production Station with a summary of previous monitoring data (TRC site code STW002016)

Parameter	Units	23 June 2016	Consent limits	N	Min	Max	Median
Chloride	g/m³	14.1	230	39	2.2	590	12.2
Conductivity	mS/m	6.0	-	41	2.3	190	7.3
Hydrocarbons	g/m³	< 0.5	15	43	< 0.5	38	< 0.5
рН		6.8	6.5-8.5	41	6.0	9.1	6.6
Suspended solids	g/m³	62	100	40	< 2	1600	32
Temperature	Deg. C	13.7	-	38	6.6	41.2	12.4
Turbidity	NTU	60		2	50	640	345

Chloride, hydrocarbons, pH and suspended solid concentrations all complied with consent conditions.

2.3.3 Results of receiving environment monitoring

Chemical

Chemical water quality sampling of the unnamed tributary of the Mangaoraka Stream was undertaken in conjunction with discharge monitoring on 23 June 2016. These results are presented in Table 2, and the sampling sites are shown in Figure 1.

Table 2 Results of receiving environment monitoring of an unnamed tributary of the Mangaoraka Stream in relation to the Kaimiro Production Station

		Consent	23 June 2016		
Parameter	Units	limits	Upstream MRK000200	Downstream MRK000202	
Chloride	g/m³	50	8.6	10.3	
Conductivity	mS/m	-	7.8	7.5	
Hydrocarbons	g/m³	-	<0.5	<0.5	
рН	рН	-	6.6	6.6	
Suspended solids	g/m³	-	20	39	
Temperature	°C	<2° increase	13.8	13.9	
Turbidity	NTU	-	21	36	

The results complied with the limits set by consent conditions for chloride and temperature increase.

Biomonitoring

The Council's standard 'kick-sampling' technique was used at three established sites to collect streambed macroinvertebrates in two tributaries of the Mangaoraka Stream in October 2015 and March 2016. Samples were processed to provide number of taxa (richness), MCI and SQMCI_s scores for each site.

The MCI is a measure of the overall sensitivity of the macroinvertebrate community to the effects of organic pollution in stony streams. It is based on the presence/absence of taxa with varying degrees of sensitivity to environmental conditions. The SQMCIs takes into account taxa abundance as well as sensitivity to pollution, and may reveal more subtle changes in communities. It may be the more appropriate index if nonorganic impacts are occurring.

Significant differences in either the MCI or the SQMCI_S between sites indicate the degree of adverse effects (if any) of the discharges being monitored.

Most of the previous surveys undertaken in relation to the Kaimiro Production Station stormwater discharge have shown that the larger tributary of the Mangaoraka Stream (sites 1 and 3) supports higher taxonomic richnesses and healthier macroinvertebrate communities. The results of both surveys undertaken during the monitoring period found site 2 had significantly lower MCI and SQMCIs scores than sites 1 and 3. This most likely reflects poorer habitat quality due to sediment deposition and high iron

oxide levels in the minor tributary where site 2 was located compared to the major tributary where sites 1 and 3 were located.

In the March 2016 survey taxonomic richness at sites 1 and 3 were similar to medians for these sites, while site 2 had substantially higher than median taxonomic richness, reflecting a lack of iron oxide at this site compared with previous surveys.

Overall there was no evidence that discharges from the Kaimiro Production Station had had any recent detrimental effects on the macroinvertebrate communities of these two unnamed tributaries of the Mangaoraka Stream.

The full biomonitoring reports are attached in Appendix II.

2.4 Results: air

2.4.1 Inspections

Air inspections were carried out in conjunction with site inspections as discussed in section 2.3.1 above. On all occasions air discharges complied with consent conditions.

2.4.2 Results of discharge monitoring

2.4.2.1 Carbon monoxide and combustible gases

During the monitoring year, a multi-gas meter was deployed on one occasion in the vicinity of the plant. The deployment lasted approximately 72 hours, with the instrument placed in a down-wind position at the start of the deployment. Monitoring consisted of continuous measurements of gas concentrations for the gases of interest (carbon monoxide and combustible gases). The monitoring sites used in the year under review are shown in Figure 2.

Because of the nature of the activities on the site, it was considered that the primary information of interest in respect of gases potentially emitted from the site was the average downwind concentration, rather than any instantaneous peak value. That is, the long-term exposure levels, rather than short-term maxima, are of most interest. The gas meter was therefore set up to create a data set based on recording the average concentration measured during each minute as raw data.





Figure 2 Air monitoring sites at Kaimiro Production Station for 2015-2016

The details of the sample run are summarised in Table 3 and the data from the sample run are presented graphically in Figure 3.

The consents covering air discharges from the Kaimiro Production Station have specific limits related to particular gases. Special condition 13 of consent 4048-3 sets a limit on the carbon monoxide concentration at or beyond the production station's boundary. The limit is expressed as 10 mg/m^3 for an eight hour average or 30 mg/m^3 for a one hour average exposure. The maximum concentration of carbon monoxide found during the monitoring run was 17.6 mg/m^3 while the average concentration for the entire dataset was 0.23 mg/m^3 , which comply with consent conditions. This is in line with the pattern found in previous years.

Table 3	Results of carbon monoxide and LEL monitoring at Kaimiro Production Station

	Period	8 to 11 April 2016 (72 hours)
Мах	CO(ppm)	13.8
Ĕ	LEL(%)	0.10
Mean	CO(ppm)	0.20
Ме	LEL(%)	0.00
ر	CO(ppm)	0.00
Min	LEL(%)	0.00

Notes:

- (1) the instrument records in units of ppm. At 25°C and 1 atm, 1ppm CO = 1.145 mg/m3
- (2) because the LEL of methane is equivalent to a mixture of approximately 5% methane in air, then the actual concentration of methane in air can be obtained by dividing the percentage LEL by 20.

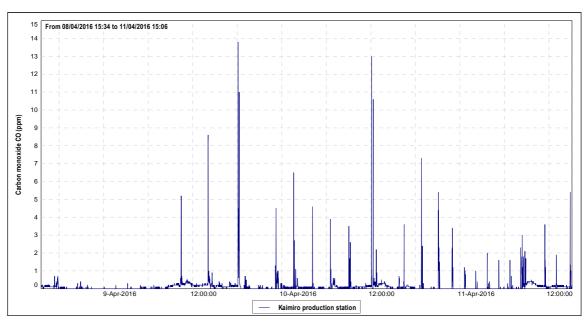


Figure 3 Ambient CO levels in the vicinity of Kaimiro Production Station

Lower Explosive Limit (LEL) gives the percentage of the lower explosive limit, expressed as methane that is detected in the air sampled. The sensor on the instrument reacts to gases and vapours such as acetone, benzene, butane, methane, propane, carbon monoxide, ethanol, and higher alkanes and alkenes, with varying degrees of sensitivity. The Council's Regional Air Quality Plan has a typical requirement that no discharge shall result in dangerous levels of airborne contaminants, including any risk

of explosion. At no time did the level of explosive gases downwind of the Kaimiro Production Station reach any more than a trivial level.

2.4.2.2 PM10 particulates

In September 2004 the Ministry for the Environment enacted National Environmental Standards (NESs) relating to certain air pollutants. The NES for PM10 particulates is $50 \,\mu g/m^3$ (24-hour average).

Particulates can be derived from many sources, including motor vehicles (particularly diesel), solid and oil-burning processes for industry and power generation, incineration and waste burning, photochemical processes, and natural sources such as pollen, abrasion, and sea spray.

PM10 particles are linked to adverse health effects that arise primarily from the ability of particles of this size to penetrate the defences of the human body and enter deep into the lungs, significantly reducing the exchange of gases across the lung walls. Health effects from inhaling PM10 include increased mortality and the aggravation of existing respiratory and cardiovascular conditions such as asthma and chronic pulmonary diseases.

During the reporting period, a DustTrak PM10 monitor was deployed on one occasion in the vicinity of Kaimiro Production Station. The deployment lasted approximately 64 hours, with the instrument placed in a down-wind position at the start of the deployment. Monitoring consisted of continual measurements of PM10 concentrations. The location of the DustTrak monitor during the sampling run is shown in Figure 2. The results of the sample run are presented in Figure 4 and Table 4.

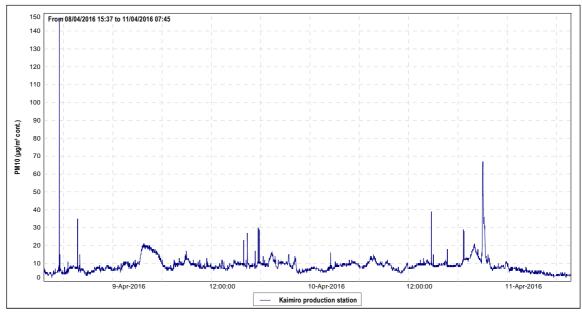


Figure 4 PM10 concentrations (μg/m³) at Kaimiro Production Station

 Table 4
 Daily averages of PM10 results from monitoring at Kaimiro Production Station

	8 to 11 April 2016 (53 hours)			
24 hr. set	Day 1	Day 2		
Daily average	8.82 µg/m³	8.56 µg/m³		
NES limit (24 hour average)	50 μg/m³			

During the 64 hour run, from 8 to 11 April 2016, the average recorded PM10 concentration was $8.82 \,\mu g/m^3$ for the first 24 hour period and $8.56 \,\mu g/m^3$ for the second 24 hour period. These daily averages equate to 17.6% and 17.1%, respectively, of the $50 \,\mu g/m^3$ value that is set by the NES. Background levels of PM10 in the region have been found to be typically around $11 \,\mu g/m^3$.

2.4.2.3 Nitrogen oxides

From 2014 onwards, the Council implemented a coordinated region-wide compliance monitoring programme to measure nitrogen oxides (NOx). The programme involves deploying measuring devices at 24 NOx monitoring sites (including two sites in the vicinity of Kaimiro Production Station) on the same day, with retrieval three weeks later. This approach assists the Council in further evaluating the effects of local and regional emission sources and ambient air quality in the region.

The consent covering air discharges from the Kaimiro Production Station has specific limits related to particular gases. Special condition 14 of consent 4048-3 sets a limit on the nitrogen dioxide concentration at or beyond the production station's boundary. The limit is expressed as 200 $\mu g/m^3$ for a 1-hour average or 100 $\mu g/m^3$ for a 24-hour average exposure.

NOx passive adsorption discs were placed at two locations in the vicinity of the Kaimiro Production Station on one occasion during the year under review (Figure 2). The discs were left in place for a period of 21 days. The calculated average 1-hour and 24-hour theoretical maximum NOx concentrations found at Kaimiro Production Station during the year under review equate to 8.94 μ g/m³ and 4.73 μ g/m³, respectively. The results show that the ambient ground level concentration of NOx is well below the limits set out by consent 4048-3.

The full air monitoring reports are attached to this report in Appendix III.

2.4.3 Summary of flaring volumes reported by GPL

A summary of flaring volumes at Kaimiro Production Station is provided in Figure 5.

Flaring occurred in most months during the year with no smoke emissions or complaints recorded. Flaring in May 2015 was related to maintenance work at the production station, while flaring in November and December 2015, and in March 2016, was due to a shutdown at Methanex. A small amount of flaring was also undertaken at the Kaimiro-B, Kaimiro-F, Kaimiro-G, and Ngatoro-E wellsites.

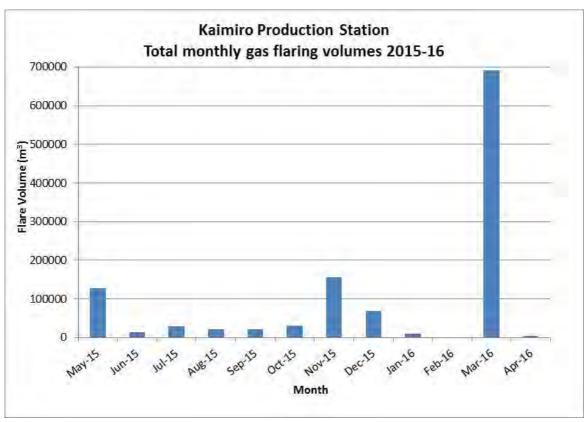


Figure 5 Summary of monthly gas flaring volumes at Kaimiro Production Station

2.5 Investigations, interventions, and incidents

The monitoring programme for the year was based on what was considered to be an appropriate level of monitoring, review of data, and liaison with the consent holder. During the year matters may arise which require additional activity by the Council, for example provision of advice and information, or investigation of potential or actual courses of non-compliance or failure to maintain good practices. A pro-active approach that in the first instance avoids issues occurring is favoured.

The Council operates and maintains a register of all complaints or reported and discovered excursions from acceptable limits and practices, including non-compliance with consents, which may damage the environment. The incident register includes events where the Company concerned has itself notified the Council. The register contains details of any investigation and corrective action taken.

Complaints may be alleged to be associated with a particular site. If there is potentially an issue of legal liability, the Council must be able to prove by investigation that the identified company is indeed the source of the incident (or that the allegation cannot be proven).

In the 2015-2016 period, the Council was not required to undertake significant additional investigations and interventions, or record incidents, in association with GPL's conditions in resource consents or provisions in Regional Plans.

3. Ngatoro producing wellsites

3.1 Resource consents

3.1.1 Water discharge permits

Section 15(1)(a) of the RMA stipulates that no person may discharge any contaminant into water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or by national regulations.

GPL held water discharge permit **4073-2** to cover the discharge of up to 100 m³/day of treated stormwater, treated production water and treated wastewater from oil well drilling and production operations and a truck turning area at the Ngatoro-A wellsite into the Ngatoro Stream in the Waitara catchment. This permit was issued by the Council on 4 February 1998 under Section 87(e) of the RMA. It expired on 1 June 2015, with the discharge covered by the conditions of the expired consent during the monitoring period while the renewed consent was being processed.

Conditions 1 to 5 require the establishment of a permanent mixing zone below the point of discharge and stipulate the limits of contaminants in the discharge, and effects the discharge shall not give rise to in both the receiving waters and the Ngatoro Stream.

Condition 6 requires that the consent holder provide a contingency plan in relation to spills at the site.

Condition 7 requires advance notification of the drilling of additional wells at the site.

Condition 8 requires advance notification of the disposal of production water via the stormwater system.

Condition 9 provides for review of the consent.

Note: the renewed consent **4073-3** *was granted on* 30 *June* 2016.

GPL also holds water discharge permit **3951-3** to discharge treated wastewater and treated stormwater from hydrocarbon exploration and production operations at the Ngatoro-B wellsite into an unnamed tributary of the Ngatoro Stream in the Waitara catchment. This permit was issued by the Council on 23 April 2009 under Section 87(e) of the RMA and is due to expire on 1 June 2027.

Condition 1 requires the consent holder to adopt the best practicable option to prevent or minimise adverse effects of the discharge on the environment.

Condition 2 imposes a limit on the stormwater catchment size.

Condition 3 requires written notification to the Council prior to commencement of site works and drilling operations.

Condition 4 requires that the consent holder prepare and maintain a contingency plan in relation to spillages at the site.

Condition 5 requires that management and maintenance of the stormwater system be undertaken in accordance with information submitted in the application.

Condition 6 requires all stormwater be directed through the stormwater treatment system.

Condition 7 requires that hazardous substance storage areas be bunded with drainage to appropriate recovery systems, and not to the stormwater catchment.

Conditions 8, 9 and 10 impose limits on contaminants in the discharge, and stipulate effects the discharge shall not give rise to in the receiving water.

Condition 11 requires that the Council be advised of reinstatement of the site.

Conditions 12 and 13 are lapse and review provisions.

These permits are attached to this report in Appendix I.

3.1.2 Air discharge permits

Section 15(1)(c) of the RMA stipulates that no person may discharge any contaminant from any industrial or trade premises into air, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations.

GPL holds air discharge permit **7295-1** to cover discharge of emissions to air during flaring from well workovers and in emergency situations and miscellaneous emissions associated with production activities at the Ngatoro-A site. This permit was issued by the Council on 12 May 2008 under Section 87(e) of the RMA and is due to expire on 1 June 2027.

Twenty two special conditions are attached to the consent regarding: information and notification (Council and neighbourhood notification, alteration to plant equipment or processes); emissions from the site (regard to wind speed, solid and liquid separation and recovery, best practicable option, offensive odour or smoke, vapour recovery systems, smoke opacity, noxious gases, other contaminants); recording and reporting information (gas stream analysis, visible smoke log, flaring log, annual air discharge report); and lapse of consent and review of conditions.

GPL also holds air discharge permit **7220-1** to cover discharge of emissions to air during flaring from well workovers and in emergency situations and miscellaneous emissions associated with production activities at the Ngatoro-B site. This permit was issued by the Council on 9 May 2008 under Section 87(e) of the RMA and is due to expire on 1 June 2027.

The 22 special conditions attached to the consent are identical to those for consent 7295-1 above.

These permits are attached to this report in Appendix I.

3.2 Monitoring programme

3.2.1 Introduction

Section 35 of the RMA sets obligations upon the Council to gather information, monitor and conduct research on the exercise of resource consents within the Taranaki region. The Council is also required to assess the effects arising from the exercising of these consents and report upon them.

The Council may therefore make and record measurements of physical and chemical parameters, take samples for analysis, carry out surveys and inspections, conduct investigations and seek information from consent holders.

The monitoring programme for the Ngatoro wellsites consisted of three primary components.

3.2.2 Programme liaison and management

There is generally a significant investment of time and resources by the Council in:

- ongoing liaison with resource consent holders over consent conditions and their interpretation and application;
- in discussion over monitoring requirements;
- preparation for any reviews;
- renewals;
- new consents;
- advice on the Council's environmental management strategies and content of regional plans; and
- consultation on associated matters.

3.2.3 Site inspections

The Ngatoro sites were visited five times during the monitoring period. With regard to consents for the abstraction of or discharge to water, the main points of interest were plant processes with potential or actual discharges to receiving watercourses, including contaminated stormwater and process wastewaters. Air inspections focused on plant processes with associated actual and potential emission sources and characteristics, including potential odour, dust, noxious or offensive emissions. Sources of data being collected by GPL were identified and accessed, so that performance in respect of operation, internal monitoring, and supervision could be reviewed by the Council. The neighbourhood was surveyed for environmental effects.

3.2.4 Chemical sampling

The Council undertook sampling of both the discharges from the Ngatoro-A wellsite and the water quality upstream and downstream of the discharge point and mixing zone.

The discharge from Ngatoro-A was sampled on one occasion during the year. The sample was analysed for hydrocarbons, suspended solids, conductivity, pH, chloride, turbidity and temperature.

The Ngatoro Stream tributary which receives discharges from the Ngatoro-A site was sampled on one occasion at two sites, and the samples were analysed for hydrocarbons, suspended solids, conductivity, pH, chloride, turbidity and temperature.

3.3 Results: water

3.3.1 Inspections

Five inspections were carried out at the Ngatoro sites in the 2015-2016 year. The following was found during the inspections:

31 July 2015

Both Ngatoro A and B sites were satisfactory. The skimmer pits were clear of contaminants and there was no flaring observed.

14 August 2015

Ring drains, bunds, and stormwater treatment systems were all secure following recent heavy rainfall. No effects from stormwater discharges were noted in the receiving waters. No flaring was being undertaken at the time of the inspection.

11 November 2015

All stormwater systems were operating effectively and no impacts on the receiving waters were visible. Storage areas for hazardous materials were either bunded or double skinned. The flare pits were secure, with no contaminants present. No flaring was being undertaken, and no smoke or odours were noted.

24 February 2016

Resident tadpoles were observed in the skimmer pits at both Ngatoro A and B, indicating good water quality. Neither system was discharging at the time of the inspections and no effects were evident in the downstream receiving waters. No flaring was being undertaken at either site.

26 May 2016 – annual wellsites inspections

All sites were inspected during very heavy rainfall and following a long period of heavy rainfall which allowed assessment of site stormwater drainage systems, treatment facilities and runoff under extreme conditions.

At all sites the stormwater was directed through the various treatment systems as per resource consent conditions. All skimmer pits were clear of contaminants. No flaring was being carried out and no off site odours were noted. Storage areas were bunded. No workovers or other well procedures were being carried out, only normal ongoing operation and maintenance activities. All sites were tidy and well managed.

3.3.2 Results of discharge monitoring

The location of water quality sampling sites in relation to both Ngatoro-A and Ngatoro-B sites are shown in Figure 6.

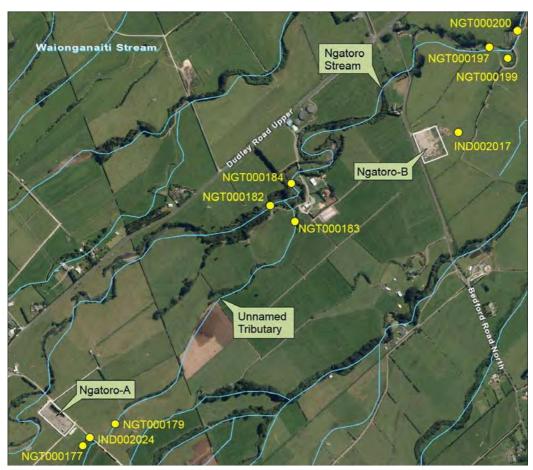


Figure 6 Monitoring sites in relation to the Ngatoro wellsites

Ngatoro-A

Chemical water sampling of the discharge from Ngatoro-A was undertaken on one occasion during the 2015-2016 monitoring period. Table 5 presents the results along with a summary of previous results.

Table 5 Results of discharge monitoring from Ngatoro-A (site IND002024) during the period under review with a summary of previous monitoring data

		23 June 2016	Previous results				
Parameter	Units	23 Julie 2010	Min	Max	Median	Number	
Chloride	g/m³	22.1	27	25,400	3,760	44	
Conductivity	mS/m	13.3	2.1	5,320	557	44	
Hydrocarbons	g/m³	<0.5	< 0.5	22	0.6	44	
рН		7.0	6.2	7.3	6.8	44	
Suspended solids	g/m³	4	< 2	260	30	44	
Turbidity	NTU	7.9	3.2	510	36	36	
Temperature	۰C	13.1	6.5	24.0	13.8	44	

The chloride concentration in the discharges was significantly lower than previous years because GPL no longer discharges treated production water via the stormwater system. No hydrocarbons were detected in the sample.

3.3.3 Results of receiving environment monitoring

Chemical

Chemical water quality sampling of the receiving environment was undertaken in conjunction with discharge monitoring on 23 June 2016. The results are presented in Table 7 below. Table 6 sets out the water quality standards relating to consent 4073-2.

The receiving water (below mixing zone) limits in consent 4073-2 apply within the Ngatoro Stream itself at site NGT000184, not in the tributary. However, two sites in the tributary of the Ngatoro Stream, upstream and downstream of the discharge point (NGT000177 and NGT000179), were sampled as with the upcoming renewal of consent 4073-2 it is expected that the tributary itself will be designated as the receiving water and these sites will be used to monitor the effect of the stormwater discharge from Ngatoro-A.

 Table 6
 Water quality standards below the mixing zone at Ngatoro-A according to consent 4073-2

Parameter	Unit	Must not exceed
Chloride	g/m³	50
pH range	g/m³	6.5-8.5
Suspended solids	g/m³	An increase of 10 (when turbidity upstream is ≤ 5 NTU)
Turbidity	NTU	An increase of 50 % (if turbidity upstream is ≥ 5 NTU)

Table 7 Results of receiving environment monitoring in relation to Ngatoro-A on 23 June 2016

Site	Chloride g/m³	Conductivity mS/m	Hydrocarbons g/m³	рН	Suspended solids g/m³	Temp °C	Turbidity NTU
NGT000177 u/s	8.8	7.3	<0.5	6.7	14	13.5	17
NGT000179 d/s	9.3	8.3	<0.5	6.8	16	13.7	16

The results indicate that the discharge was having minimal effect on the water quality of the Ngatoro Stream at the times of sampling (refer to the difference between the upstream NGT000177 and downstream NGT000179 site results). Chloride levels, suspended solids, pH and turbidity below the mixing zone were all within consent limits on both occasions.

3.4 Results-air

3.4.1 Inspections

Air inspections were carried out in conjunction with site inspections as discussed in section 3.3.1 above. On all occasions air discharges complied with consent conditions.

3.5 Investigations, interventions, and incidents

The monitoring programme for the year was based on what was considered to be an appropriate level of monitoring, review of data, and liaison with the consent holder. During the year matters may arise which require additional activity by the Council, for example provision of advice and information, or investigation of potential or actual

courses of non-compliance or failure to maintain good practices. A pro-active approach that in the first instance avoids issues occurring is favoured.

The Council operates and maintains a register of all complaints or reported and discovered excursions from acceptable limits and practices, including non-compliance with consents, which may damage the environment. The incident register includes events where the Company concerned has itself notified the Council. The register contains details of any investigation and corrective action taken.

Complaints may be alleged to be associated with a particular site. If there is potentially an issue of legal liability, the Council must be able to prove by investigation that the identified company is indeed the source of the incident (or that the allegation cannot be proven).

In the 2015-2016 period, the Council was not required to undertake significant additional investigations and interventions, or record incidents, in association with GPL's conditions in resource consents or provisions in Regional Plans.

4. Discussion

4.1 Discussion of site performance

Inspections of the Kaimiro and Ngatoro sites during the 2015-2016 monitoring year found that they were well managed and the stormwater systems were maintained to a satisfactory standard. Emissions to air were well controlled.

4.2 Environmental effects of exercise of consents

4.2.1 Kaimiro Production Station

Results of samples collected of the discharge and receiving waters were within the limits prescribed by the consents and, along with the results of biomonitoring carried out in the Mangaoraka Stream, indicated that the discharges were not having a significant adverse effect on the downstream water quality.

There were no adverse environmental effects recorded as a result of the exercise of the air discharge permit at the Kaimiro Production Station. Measurements of ambient air quality at the site showed that the concentrations of carbon monoxide, nitrogen oxide, volatile organic compounds and combustible gases were below levels of concern.

4.2.2 Ngatoro producing wellsites

Results of samples collected of the discharge and receiving waters were within the limits prescribed by the consents and indicated that the discharges were not having a significant adverse effect on the downstream water quality.

Flaring was not undertaken at Ngatoro-A or Ngatoro-B during the monitoring period.

4.3 Evaluation of performance

A tabular summary of the consent holder's compliance record for the year under review is set out in Tables 8-14.

4.3.1 Kaimiro Production Station

 Table 8
 Summary of performance for Consent 1334-3

Purpose: To discharge treated stormwater from the Kaimiro Production Station site into an unnamed tributary				
Condition requirement		Means of monitoring during period under review	Compliance achieved?	
1.	Best practicable option to prevent effects on environment	Site inspections	Yes	
2.	Maximum stormwater catchment	Site inspections	Yes	
3.	Contingency plan provided prior to commencement	Received	Yes	
4.	Site water directed for treatment through stormwater treatment system	Site inspections	Yes	

Condition requirement		Means of monitoring during period under review	Compliance achieved?
5.	Design, management and maintenance of stormwater system in accordance with application	Site inspections	Yes
6.	Hazardous storage areas bunded with drainage to sumps	Site inspections	Yes
7.	Limits on contaminants in the discharge	Sample collection	Yes
8.	Limits on chloride, BOD and temperature increase below mixing zone	Sample collection	Yes
9.	Effects on receiving water below mixing zone	Inspection, sample collection and biomonitoring	Yes
10.	Annual preparation and maintenance of contingency plan relating to spills at the site	Updated plan provided in May 2016	Yes
11.	Council advised prior to reinstatement of the site	Site not reinstated during period under review	N/A
12.	Provisions for review of consent conditions	No further provision for review prior to expiry	N/A
Overall assessment of environmental performance and compliance in respect of this consent Overall assessment of administrative performance in respect of this consent			High High

N/A = not applicable

 Table 9
 Summary of performance for Consent 4048-3

Pui	Purpose: To discharge emissions into the air from the flaring of hydrocarbons				
Co	ndition requirement	Means of monitoring during period under review	Compliance achieved?		
1.	Limit on flaring duration	Site inspections and company logs	Yes		
2.	Neighbours notified prior to flaring	Information provided to neighbours	Yes		
3.	Council notified of continuous flaring	Notifications received	Yes		
4.	Consultation prior to alteration to plant equipment or processes	Site inspections and liaison with consent holder	Yes		
5.	Regard given to wind conditions during flaring	No complaints received from neighbours	Yes		
6.	Gas treated by liquid and solid separation and recovery	Site inspections	Yes		
7.	No liquid or solid hydrocarbons combusted through gas flare	Site inspections	Yes		

Condition requirement	Means of monitoring during period under review	Compliance achieved?
Flare only used to dispose of substances from the well stream	Site inspections	Yes
Hydrocarbon storage vessels fitted with vapour recovery systems	Site inspections	Yes
Best practicable option to prevent effects on environment	Site inspections	Yes
No offensive odour or smoke at boundary of site	Site inspections	Yes
12. Limit on smoke opacity	Site inspections	Yes
13. Limit on carbon monoxide emissions	Ambient gas monitoring	Yes
14. Limit on nitrogen dioxide emissions	Ambient gas monitoring	Yes
15. No discharge of contaminant that is hazardous, toxic or noxious beyond boundary	Site inspections and ambient gas monitoring	Yes
No discharge of contaminant that exceeds specific WES limits	Ambient gas monitoring	Yes
17. Record of smoke emitting incidents	Annual air report received	Yes
18. Provision of flaring logs to Council	Flaring logs received	Yes
19. Maintenance of flaring logs	Flaring logs received	Yes
20. Provision of annual air emissions report	Report received	Yes
21. Analysis of gas and crude oil stream	Not requested during period under review	N/A
22. Provisions for review of consent conditions	Optional review scheduled in June 2020 if required	N/A
Overall assessment of environmental perform	nance and compliance in respect of this consent nance in respect of this consent	High High

 Table 10
 Summary of performance for Consent 5384-2

Pu	Purpose: To take groundwater from the Matemateaonga Formation			
Condition requirement		Means of monitoring during period under review	Compliance achieved?	
1.	Total volume abstracted not to exceed 550 m³/day or 6.4 l/s	Review of data provided by consent holder	Yes	
2.	Bore to be labelled	Site inspections	Yes	
3.	Installation and maintenance of water meter and datalogger	Site inspections	Yes	

Pui	Purpose: To take groundwater from the Matemateaonga Formation				
Co	Condition requirement Means of monitoring during period under review				
4.	Provision of data annually by 31 July	Data provided	Yes		
5.	Documentation proving equipment has been installed and is accurate	Certification achieved	Yes		
6.	Water meter and datalogger to be accessible to Council staff	Site inspections	Yes		
7.	Council to be notified if equipment breaks down	No issues during the period	Yes		
8.	Best practicable option to prevent or minimise adverse environmental effects	Site inspections and liaison with consent holder	Yes		
9.	Lapse of consent		N/A		
10.	Provisions for review of consent conditions	Optional review scheduled in June 2020 if required	N/A		
	Overall assessment of environmental performance and compliance in respect of this consent Overall assessment of administrative performance in respect of this consent				

4.3.2 Ngatoro-A wellsite

 Table 11
 Summary of performance for Consent 4073-2

Pui	Purpose: To discharge up to 100 m3/day of treated stormwater, treated production water and waster water				
Co	ndition requirement	Means of monitoring during period under review	Compliance achieved?		
1.	Establishment of permanent mixing zone 25 m below discharge	Mixing zone established prior to monitoring period	N/A		
2.	Effects on stream below mixing zone	Inspections and sampling	Yes		
3.	Limit on hydrocarbons in discharge	Sampling	Yes		
4.	Limits on chloride and pH in receiving waters	Sampling	Yes		
5.	Suspended solid and turbidity levels below mixing zone	Sampling	Yes		
6.	Provision of contingency plan	Updated plan provided in May 2016	Yes		
7.	Advise Council prior to drilling of additional wells	No drilling undertaken during monitoring period	N/A		
8.	Notification prior to discharge of production water	No discharge of produced water during monitoring period	N/A		

Purpose: To discharge up to 100 m3/day of treated stormwater, treated production water and waster water			
Condition requirement Means of monitoring during period under review Compliance achieved?			
Provisions for review of consent conditions	N/A		
Overall assessment of environmental performance of the control of	High High		

 Table 12
 Summary of performance for Consent 7295-1

Purpose: To discharge emissions to air during flaring			
Con	dition requirement	Means of monitoring during period under review	Compliance achieved?
1.	Council notified of continuous flaring	No flaring at site during monitoring period	N/A
2.	Neighbours notified prior to flaring	No flaring at site during monitoring period	N/A
3.	Consultation prior to alteration to plant equipment or processes	Site inspections	Yes
4.	Regard given to wind conditions during flaring	No flaring at site during monitoring period	N/A
5.	Gas treated by liquid and solid separation and recovery	Site inspections	Yes
6.	Notify Council of any failure to maintain liquid and solid separation	No flaring at site during monitoring period	N/A
7.	No liquid or solid hydrocarbons combusted through gas flare	No flaring at site during monitoring period	N/A
8.	Best practicable option to prevent effects on environment	No flaring at site during monitoring period	N/A
9.	Flare only used to dispose of substances from the well stream	No flaring at site during monitoring period	N/A
10.	No offensive odour or smoke at boundary of site	No flaring at site during monitoring period	N/A
11.	Hydrocarbon storage vessels fitted with vapour recovery systems	Site inspections	Yes
12.	Limit on smoke opacity	No flaring at site during monitoring period	N/A
13.	Limit on carbon monoxide emissions	No flaring at site during monitoring period	N/A
14.	Limit on nitrogen dioxide emissions	No flaring at site during monitoring period	N/A
15.	No discharge of contaminant that is hazardous, toxic or noxious beyond boundary	No flaring at site during monitoring period	N/A

Purpose: To discharge emissions to air during flaring			
Condition requirement	Compliance achieved?		
No discharge of contaminant that exceeds specific WES limits	No flaring at site during monitoring period	N/A	
17. Analysis of gas and crude oil stream	No flaring at site during monitoring period	N/A	
18. Record of smoke emitting incidents	No flaring at site during monitoring period	N/A	
19. Maintenance of flaring logs No flaring at site during monitoring period		N/A	
20. Provision of annual air emissions report Report received		Yes	
21. Lapse of consent	N/A		
22. Provisions for review of consent conditions	N/A		
Overall assessment of environmental perform Overall assessment of administrative perform	High High		

4.3.3 Ngatoro-B wellsite

 Table 13
 Summary of performance for Consent 3951-3

Purpose: To discharge treated stormwater and wastewater			
Co	ndition requirement	Means of monitoring during period under review	Compliance achieved?
1.	Best practicable option to prevent effects on environment	Site inspections	Yes
2.	Maximum stormwater catchment	Site inspections	Yes
3.	Notification prior to site works or drilling activities	Site inspections (no works during period)	Yes
4.	Contingency plan provided to Council	Update of plan received May 2016	Yes
5.	Activity undertaken in accordance with application	Site inspections	Yes
6.	All stormwater and waste water to be directed through treatment system	Site inspections and sampling	Yes
7.	Hazardous substance areas to be isolated from the stormwater system	Site inspections	Yes
8.	Limits on contaminants in the discharge	Not assessed during period under review	N/A
9.	Limit on temperature increase below the mixing zone	Not assessed during period under review	N/A

Purpose: To discharge treated stormwater and wastewater			
Condition requirement	Compliance achieved?		
Effects on receiving water below mixing zone	Inspections	Yes	
Reinstatement to the satisfaction of the Council Site not reinstated during the period under review		N/A	
12. Lapse of consent Consent exercised within lapse period		N/A	
13. Review provisions	N/A		
Overall assessment of environmental perform Overall assessment of administrative perform	High High		

 Table 14
 Summary of performance for Consent 7220-1

Purpose: To discharge emissions to air			
Condition requirement		Means of monitoring during period under review	Compliance achieved?
1.	Council notified of continuous flaring	No flaring at site during monitoring period	N/A
2.	Neighbours notified prior to flaring	No flaring at site during monitoring period	N/A
3.	Consultation prior to alteration to plant equipment or processes	Site inspections and liaison with consent holder	Yes
4.	Regard given to wind conditions during flaring	No flaring at site during monitoring period	N/A
5.	Gas treated by liquid and solid separation and recovery	No flaring at site during monitoring period	N/A
6.	Notify Council of any failure to maintain liquid and solid separation	No flaring at site during monitoring period	N/A
7.	No liquid or solid hydrocarbons combusted through gas flare	No flaring at site during monitoring period	N/A
8.	Best practicable option to prevent effects on environment	Site inspections	Yes
9.	Flare only used to dispose of substances from the well stream	No flaring at site during monitoring period	N/A
10.	No offensive odour or smoke at boundary of site	No flaring at site during monitoring period	N/A
11.	Hydrocarbon storage vessels fitted with vapour recovery systems	Site inspections	Yes
12.	Limit on smoke opacity	No flaring at site during monitoring period	N/A

Purpose: To discharge emissions to air			
Condition requirement	Compliance achieved?		
13. Limit on carbon monoxide emissions	No flaring at site during monitoring period	N/A	
14. Limit on nitrogen dioxide emissions	No flaring at site during monitoring period	N/A	
15. No discharge of contaminant that is hazardous, toxic or noxious beyond boundary	No flaring at site during monitoring period	N/A	
16. No discharge of contaminant that exceeds specific WES limits	No flaring at site during monitoring period	N/A	
17. Analysis of gas and crude oil stream	No flaring at site during monitoring period	N/A	
18. Record of smoke emitting incidents	ents No flaring at site during monitoring period		
No flaring at site during monitoring period		N/A	
20. Provision of annual air emissions report Report received		Yes	
21. Lapse of consent Consent exercised within lapse period		N/A	
22. Provisions for review of consent conditions	Optional review scheduled in June 2021 if required	N/A	
Overall assessment of environmental perfor	High High		

4.3.4 Summary

During the period under review, GPL demonstrated an overall high level of both environmental performance and administrative compliance with the resource consents as defined in Section 1.1.4. There were no unauthorised incidents recorded by the Council in relation to GPL's activities. The Kaimiro Production Station and associated wellsites were well managed and maintained.

4.4 Recommendations from the 2014-2015 Annual Report

In the 2014-2015 Annual Report, it was recommended:

1. THAT for 2015-2016 the monitoring programme for consented activities at the Kaimiro and Ngatoro sites is amended from that in 2014-2015 with the removal of the macroinvertebrate survey undertaken in the Ngatoro Stream to reflect the consolidation of the majority of production activities for the Kaimiro/Ngatoro assets at Kaimiro Production Station in recent years.

This recommendation was implemented.

4.5 Alterations to monitoring programmes for 2016-2017

In designing and implementing the monitoring programmes for air/water discharges in the region, the Council has taken into account:

- the extent of information made available by previous authorities;
- its relevance under the RMA;
- its obligations to monitor emissions/discharges and effects under the RMA; and
- to report to the regional community.

The Council also takes into account the scope of assessments required at the time of renewal of permits, and the need to maintain a sound understanding of industrial processes within Taranaki emitting to the atmosphere/discharging to the environment.

It is proposed that for 2016-2017 the monitoring programme for consented activities at the Kaimiro and Ngatoro sites remain unchanged from 2015-2016.

5. Recommendation

1. THAT monitoring of consented activities at the Kaimiro and Ngatoro sites in the 2016-2017 year continue at the same level as in 2015-2016.

Glossary of common terms and abbreviations

The following abbreviations and terms may be used within this report:

Biomonitoring Assessing the health of the environment using aquatic organisms.

Bund A wall around a tank to contain its contents in the case of a leak.

Conductivity, an indication of the level of dissolved salts in a sample,

usually measured at 20°C and expressed in mS/m.

g/m³ Grams per cubic metre, and equivalent to milligrams per litre (mg/L). In

water, this is also equivalent to parts per million (ppm), but the same does

not apply to gaseous mixtures.

Incident An event that is alleged or is found to have occurred that may have actual

or potential environmental consequences or may involve non-compliance with a consent or rule in a regional plan. Registration of an incident by the Council does not automatically mean such an outcome had actually

occurred.

Intervention Action/s taken by Council to instruct or direct actions be taken to avoid

or reduce the likelihood of an incident occurring.

Investigation Action taken by Council to establish what were the circumstances/events

surrounding an incident including any allegations of an incident.

Incident Register
The incident register contains a list of events recorded by the Council on

the basis that they may have the potential or actual environmental consequences that may represent a breach of a consent or provision in a

Regional Plan.

L/s Litres per second.

LEL Lower Explosive Limit. The percentage of the lower explosive limit,

expressed as methane, that is detected in the air sampled.

m² Square Metres.

mg/m³ Milligrams per cubic metre.

MCI Macroinvertebrate community index; a numerical indication of the state

of biological life in a stream that takes into account the sensitivity of the

taxa present to organic pollution in stony habitats.

mS/m Millisiemens per metre.

Mixing zone The zone below a discharge point where the discharge is not fully mixed

with the receiving environment. For a stream, conventionally taken as a length equivalent to 7 times the width of the stream at the discharge

point.

NES National Environmental Standards.

NOx Nitrogen oxides.

NTU Nephelometric Turbidity Unit, a measure of the turbidity of water.

O&G Oil and grease, defined as anything that will dissolve into a particular

organic solvent (e.g. hexane). May include both animal material (fats) and

mineral matter (hydrocarbons).

pH A numerical system for measuring acidity in solutions, with 7 as neutral.

Numbers lower than 7 are increasingly acidic and higher than 7 are increasingly alkaline. The scale is logarithmic i.e. a change of 1 represents

a ten-fold change in strength. For example, a pH of 4 is ten times more

acidic than a pH of 5.

Physicochemical Measurement of both physical properties (e.g. temperature, clarity,

density) and chemical determinants (e.g. metals and nutrients) to

characterise the state of an environment.

PM₁₀ Relatively fine airborne particles (less than 10 micrometre diameter).

Resource consent Refer Section 87 of the RMA. Resource consents include land use consents

(refer Sections 9 and 13 of the RMA), coastal permits (Sections 12, 14 and

15), water permits (Section 14) and discharge permits (Section 15).

RMA Resource Management Act 1991 and including all subsequent amendments.

SS Suspended solids.

SQMCI Semi quantitative macroinvertebrate community index.

Temp Temperature, measured in °C (degrees Celsius).

Turb Turbidity, expressed in NTU.

UI Unauthorised Incident.

For further information on analytical methods, contact the Council's laboratory.

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Appendix I

Resource consents held by Greymouth Petroleum

(For a copy of the signed resource consent please contact the TRC consent department)

Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Greymouth Petroleum Acquisition Company Limited

Consent Holder: P O Box 3394

Fitzroy

NEW PLYMOUTH 4341

Decision Date

(Change):

8 April 2014

Commencement Date

(Change):

8 April 2014 (Granted: 10 January 2002)

Conditions of Consent

Consent Granted: To discharge treated stormwater from the Kaimiro

Production Station site into an unnamed tributary of the Mangaoraka Stream in the Waiongana catchment

Expiry Date: 1 June 2020

Review Date(s): June 2014

Site Location: Kaimiro Production Station, Upland Road, Inglewood

Legal Description: Lot 4 DP 436344 (Discharge source)

Lot 2 DP 19651 (Discharge site)

Grid Reference (NZTM) 1699783E-5664369N

Catchment: Waiongana

Tributary: Mangaoraka

For General, Standard and Special conditions pertaining to this consent please see reverse side of this document

Page 1 of 3

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

- 1. The consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any adverse effects of the discharge on any water body.
- 2. The maximum stormwater catchment area shall be no more than 25,000 m².
- 3. Prior to the exercise of this consent, the consent holder shall provide for the written approval of the Chief Executive, Taranaki Regional Council, site specific details relating to contingency planning for the production site.
- 4. All site water to be discharged under this permit shall be directed for treatment through the stormwater treatment system for discharge in accordance with the specific conditions of this permit.
- 5. The design, management and maintenance of the stormwater system shall be generally undertaken:
 - in accordance with the stormwater management plan submitted to Taranaki Regional Council on 16 August 2012, in response to the request for further information for application 7156; and
 - as amended by the stormwater design report submitted with the application for consent 1334-3.2, prepared by BTW Company Limited and dated 28 February 2014.

These plans shall be followed at all times. If changes are proposed, the consent holder shall advise the Taranaki Regional Council one month prior to the changes to the plan.

- 6. Any above ground hazardous substances storage areas shall be bunded with drainage to sumps, or other appropriates recovery systems, and not to the stormwater catchment.
- 7. Constituents of the discharge shall meet the standards shown in the following table.

Constituent	Concentration
pH (range)	6.5 – 8.5
suspended solids	100 gm ⁻³
total recoverable hydrocarbons (infrared spectroscopic technique)	15 gm ⁻³
chloride	230 gm ⁻³

This condition shall apply before entry of the treated stormwater, at a designated sampling point approved by the Chief Executive, Taranaki Regional Council.

Consent 1334-3.2

- 8. After allowing for reasonable mixing, within a mixing zone extending 15 metres downstream of the discharge point, the discharge shall not give rise to any of the following effects in the receiving waters of the unnamed tributary of the Mangaoraka Stream:
 - a. an increase in temperature of more than 2 degrees Celsius; and
 - b. filtered carbonaceous biochemical oxygen demand shall not exceed 2.00 gm⁻³; or
 - c. shall not cause the chloride concentration to exceed 50 gm⁻³
- 9. After allowing for reasonable mixing, within a mixing zone extending 15 metres downstream of the discharge point, the discharge shall not give rise to any of the following effects in the receiving waters of the unnamed tributary of the Mangaoraka Stream:
 - a. the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;
 - b. any conspicuous change in the colour or visual clarity;
 - c. any emission of objectionable odour;
 - d. the rendering of fresh water unsuitable for consumption by farm animals; and
 - e. any significant adverse effects on aquatic life.
- 10. The consent holder shall prepare annually and maintain a contingency plan to the satisfaction of the Chief Executive, Taranaki Regional Council, outlining measures and procedures undertaken to prevent spillage or accidental discharge of contaminants, and procedures to be carried out should such a spillage or discharge occur.
- 11. The Chief Executive, Taranaki regional Council, shall be advised in writing at least 48 hours prior to the reinstatement of the site and the reinstatement shall be carried out so as to minimise effects on stormwater quality.
- 12. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2008 and/or June 2014, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

For and on behalf of

Signed at Stratford on 8 April 2014

Taranaki Regional Council
A D McL ov
A D McLay Director-Resource Management

Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Greymouth Petroleum Limited

Consent Holder: P O Box 3394

NEW PLYMOUTH 4341

Consent Granted

Date:

23 April 2009

Conditions of Consent

Consent Granted: To discharge treated wastewater and treated stormwater

from hydrocarbon exploration and production operations into an unnamed tributary of the Ngatoro Stream a tributary of the Manganui River in the Waitara catchment at or about

(NZTM) 1702355E-5660948N

Expiry Date: 1 June 2027

Review Date(s): June 2015, June 2021

Site Location: Ngatoro-B wellsite, Bedford Road, Inglewood

[Property owner: GD & CJ Alexander]

Legal Description: Pt Sec 127 Moa Dist Blk VIII Egmont SD

Catchment: Waitara

Tributary: Manganui

Ngatoro

General conditions

- a) On receipt of a requirement from the Chief Executive, Taranaki Regional Council the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) Unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) The consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

- 1. The consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or likely adverse effect on the environment associated with the discharge of contaminants from the site.
- 2. Stormwater discharged shall be collected from a catchment area of no more than 12,000 m².
- 3. The Chief Executive, Taranaki Regional Council, shall be advised in writing at least 7 days prior to any site works commencing, and again in writing at least 7 days prior to any well drilling operation commencing. Notification shall include the consent number and a brief description of the activity consented and be emailed to worknotification@trc.govt.nz.
- 4. The consent holder shall maintain a contingency plan that, to the satisfaction of the Chief Executive, Taranaki Regional Council, details measures and procedures to be undertaken to prevent spillage or accidental discharge of contaminants not authorised by this consent and measures to avoid, remedy or mitigate the environmental effects of such a spillage or discharge.
- 5. The management and maintenance of the stormwater system shall be undertaken in accordance with the information submitted in support of the consent application [application 5221].

- 6. All stormwater and wastewater shall be directed for treatment through the stormwater treatment system before being discharged.
- 7. Any above ground hazardous substances storage areas shall be bunded with drainage to sumps, or other appropriate recovery systems, and not to the stormwater catchment.
- 8. Constituents in the discharge shall meet the standards shown in the following table.

Constituent	Standard
рН	Within the range 6.0 to 9.0
suspended solids	Concentration not greater than 100 gm ⁻³
total recoverable hydrocarbons	Concentration not greater than 15 gm ⁻³ [as
	determined by infrared spectroscopic
	technique]
chloride	Concentration not greater than 50 gm ⁻³

This condition shall apply prior to the entry of the treated stormwater into the receiving waters at a designated sampling point approved by the Chief Executive, Taranaki Regional Council.

- 9. After allowing for a mixing zone of 25 metres, the discharge shall not give rise to an increase in temperature of more than 2 degrees Celsius.
- 10. After allowing for a mixing zone of 25 metres, the discharge shall not give rise to any of the following effects in the receiving water:
 - a) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;
 - b) any conspicuous change in the colour or visual clarity;
 - c) any emission of objectionable odour;
 - d) the rendering of fresh water unsuitable for consumption by farm animals;
 - e) any significant adverse effects on aquatic life.
- 11. The consent holder shall advise the Chief Executive, Taranaki Regional Council, in writing at least 48 hours prior to the reinstatement of the site and the reinstatement shall be carried out so as to minimise effects on stormwater quality. Notification shall include the consent number and a brief description of the activity consented and be emailed to worknotification@trc.govt.nz.
- 12. This consent shall lapse on 30 June 2014, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.

Consent 3951-3

13. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2015 and/or June 2021, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Signed at Stratford on 23 April 2009

For and on behalf of
Taranaki Regional Council
Director-Resource Management

Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Greymouth Petroleum Acquisition Company Limited

Consent Holder: P O Box 3394

NEW PLYMOUTH 4341

Consent Granted

Date:

10 January 2008

Conditions of Consent

Consent Granted: To discharge emissions into the air from the flaring of

hydrocarbons arising from hydrocarbon production and processing operations, together with miscellaneous emissions, at the Kaimiro Production Station at or about

2609726E-6225978N

Expiry Date: 1 June 2026

Review Date(s): June 2014, June 2020

Site Location: Upland Road, Inglewood

Legal Description: Pt Sec 115 Tarurutangi Dist Blk III Egmont SD

General conditions

- a) On receipt of a requirement from the Chief Executive, Taranaki Regional Council the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) Unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) The consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

Duration

1. Flaring of gas from each well during well testing shall not occur on more than 30 days.

Information and notification

- 2. At least 24 hours before any flaring, other than in emergencies, the consent holder shall provide notification to all residents within 1000 metres of the site of the commencement of flaring. The consent holder shall include in the notification a 24-hour contact telephone number for a representative of the consent holder, and shall keep and make available to the Chief Executive, Taranaki Regional Council, a record of all queries and complaints received.
- 3. The consent holder shall notify the Chief Executive, Taranaki Regional Council, whenever the continuous flaring of hydrocarbons [other than purge gas] is expected to occur for more than five minutes in duration. Notification shall be no less than 24 hours before the flaring commences. Notification shall include the consent number and be emailed to worknotification@trc.govt.nz. Notification by fax or post is acceptable if the consent holder does not have access to email.
- 4. No alteration shall be made to plant equipment or processes which may substantially alter the nature or quantity of flare emissions or other site emissions, including but not limited to the recovery of produced gas, other than as authorised by this consent, without prior consultation with the Chief Executive, Taranaki Regional Council.

Emissions from the site

5. Other than for the maintenance of a pilot flare flame, the consent holder shall have regard to the prevailing and predicted wind speed and direction at the time of initiation of, and throughout, any episode of flaring so as to minimise offsite effects.

Consent 4048-3

- 6. All gas that is flared must first be treated by effective liquid and solid separation and recovery to ensure that smoke emission during flaring is minimised.
- 7. No liquid or solid hydrocarbons shall be combusted through the gas flare system.
- 8. Only substances originating from the well stream and treated as outlined by conditions 6 and 7 shall be combusted within the flare pit.
- 9. All hydrocarbon storage vessels shall be fitted with vapour recovery systems.
- 10. The consent holder shall adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or potential effect on the environment arising from any emission to air from the flare or any other emissions to air from the Kaimiro Production Station.
- 11. There shall not be any offensive odour or smoke at or beyond the boundary of the property where the production station is located.
- 12. The opacity of any smoke emissions shall not exceed a level of 1 as measured on the Ringelmann Scale.
- 13. The consent holder shall control all emissions of carbon monoxide to the atmosphere from the flare so that, whether alone or in conjunction with any other emissions from the production station, the maximum ground level concentration of carbon monoxide arising from the exercise of this consent measured under ambient conditions does not exceed 10 milligrams per cubic metre [mg/m³] [eight-hour average exposure], or 30 mg/m³ one-hour average exposure] at or beyond the boundary of the property.
- 14. The consent holder shall control all emissions of nitrogen oxides to the atmosphere from the flare so that, whether alone or in conjunction with any other emissions from the production station, the maximum ground level concentration of nitrogen dioxide arising from the exercise of this consent measured under ambient conditions does not exceed 100 micrograms per cubic metre $[\mu g/m^3][24$ -hour average exposure], or 200 $\mu g/m^3$ [1-hour average exposure] at or beyond the boundary of the of the property.
- 15. The consent holder shall control emissions to the atmosphere, from the production station and flare, of contaminants other than carbon dioxide, carbon monoxide, and nitrogen oxides so that, whether alone or in conjunction with any other emissions from the production station, is not hazardous or toxic or noxious at or beyond the boundary of the property.
- 16. The consent holder shall control emissions to the atmosphere from the production station and flare of contaminants other than carbon dioxide, carbon monoxide, and nitrogen oxides so that, whether alone or in conjunction with any emissions from the flare, the maximum ground level concentration for any particular contaminant arising from the exercise of this consent measured at or beyond the boundary of the property, is not increased above background levels:

- a) by more than 1/30th of the relevant Occupational Threshold Value-Time Weighted Average, or by more than the Short Term Exposure Limit at any time [all terms as defined in Workplace Exposure Standards, 2002, Department of Labour]; or
- b) if no Short Term Exposure Limit is set, by more than three times the Time Weighted Average at any time [all terms as defined in Workplace Exposure Standards, 2002, Department of Labour].

Recording and reporting information

- 17. Each time there is visible smoke as a result of the exercise of this consent, the consent holder shall record the time, duration and cause. The consent holder shall make the record available to the Chief Executive, Taranaki Regional Council, upon request.
- 18. Each month, the consent holder shall supply to the Chief Executive, Taranaki Regional Council a record of flaring information in relation to the production station, and each wellsite. The flaring information supplied shall comprise: the type and amount of material flared [including any gas used to maintain a pilot flame], the date this was flared, the reason why flaring was undertaken, and an indication of whether smoke was produced from the flaring events.
- 19. The consent holder shall record and maintain a log of all continuous flaring events longer than five minutes duration, and any intermittent flaring lasting for an aggregate of ten minutes or longer in any 120-minute period. The log shall contain the date, the start and finish times of the flaring event, the quantity and type of material flared, and the reason for flaring. The log shall be made available to the Chief Executive, Taranaki Regional Council, upon request, and summarised annually in the report required under condition 20.
- 20. The consent holder shall provide to the Taranaki Regional Council during May of each year, for the duration of this consent, a report:
 - i) detailing any energy efficiency measures implemented on the site;
 - ii) detailing smoke emissions as required under condition 17;
 - iii) detailing any measures undertaken or proposed to reduce smoke emissions;
 - iv) detailing any measures undertaken or proposed to reduce flaring;
 - v) addressing any other issue relevant to the minimisation or mitigation of emissions from the flare;
 - vi) detailing any complaints received and any measures undertaken to address complaints; and
 - vii) reviewing all options and technological advances relevant to the reduction or mitigation of any discharge to air from the site, how these might be applicable and/or implemented at the site, and the benefits and costs of these advances.
- 21. The consent holder shall make available to the Chief Executive, Taranaki Regional Council, upon request, an analysis of a typical gas and condensate stream from the field, covering sulphur compound content and the content of carbon compounds of structure C₆ or higher number of compounds.

Review

- 22. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent within six months of receiving a report prepared by the consent holder pursuant to condition 20 of this consent, and/or by giving notice of review during the month of June 2014 and/or June 2020, for any of the following purposes:
 - a) dealing with any significant adverse effect on the environment arising from the exercise of the consent which was not foreseen at the time the application was considered or which it was not appropriate to deal with at the time;
 - b) requiring the consent holder to adopt the best practicable option to remove or reduce any adverse effect on the environment caused by the discharge;
 - c) to alter, add or delete limits on mass discharge quantities or discharge or ambient concentrations of any contaminant;
 - d) taking into account any Act of Parliament, regulation, national policy statement or national environmental standard which relates to limiting, recording, or mitigating emissions of gases which are products of combustion, and which is relevant to the air discharge from the Kaimiro Production Station.

Signed at Stratford on 10 January 2008

For and on behalf of
Taranaki Regional Council
O
Director-Resource Management

Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Greymouth Petroleum Acquisition Company Limited

Consent Holder: P O Box 3394

Fitzroy

NEW PLYMOUTH

Consent Granted

Date:

4 February 1998

Conditions of Consent

Consent Granted: To discharge up to 100 cubic metres/day of treated

stormwater, treated production water and treated wastewater from oil well drilling and production operations and a truck turning area into the Ngatoro Stream a tributary of the Manganui River in the Waitara Catchment at or

about GR: Q19:110-217

Expiry Date: 1 June 2015

Review Date(s): June 2003, June 2009

Site Location: Ngatoro-1 Wellsite, Dudley Road, Inglewood

[Property owner: I & EE Jones]

Legal Description: Sec 11 Pt Sec 17 Blk VIII Egmont SD

Catchment: Waitara

Tributary: Manganui

Ngatoro

General conditions

- a) That on receipt of a requirement from the Chief Executive, Taranaki Regional Council (hereinafter the Chief Executive), the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) That unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) That the consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

- 1. That the consent holder, in conjunction with the Taranaki Regional Council, shall establish a permanent mixing zone for the discharge, which is 25 metres below the point of discharge into the receiving waters of the Ngatoro Stream.
- 2. That, after allowing for a mixing zone established for special condition 1, the discharge shall not give rise to any of the following effects in the receiving water:
 - a) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;
 - b) any conspicuous change in the colour or visual clarity;
 - c) any emission of objectionable odour;
 - d) the rendering of fresh water unsuitable for consumption by farm animals;
 - e) any significant adverse effects on aquatic life.
- 3. That the discharge shall not contain total recoverable hydrocarbons [infrared spectroscopic technique] in excess of 15 gm⁻³ at any time.
- 4. That the discharge shall not cause the receiving waters of the Ngatoro Stream to exceed the following limits, outside of the mixing zone established in special condition 1, at any time:

chloride 50 gm⁻³ pH range 6.5 - 8.5

- 5. That after allowing for the mixing zone established for special condition 1, the discharge shall not give rise to either of the following effects in the receiving waters of the Ngatoro Stream:
 - an increase in suspended solids concentration in excess of 10 gm⁻³ when the stream turbidity as measured immediately upstream of the discharge point is equal to or less than 5 nephelometric turbidity units [NTU]; or
 - ii) an increase in turbidity of more than 50% when the stream turbidity as measured immediately upstream if the discharge point is greater than 5 NTU.
- 6. That the consent holder shall provide, for the written approval of the Chief Executive, a contingency plan outlining measures and procedures undertaken to prevent a spillage, or accidental discharge of materials and/or waters not licensed by this consent and procedures to be carried out should such a spillage or discharge occur.
- 7. That the consent holder shall advise the Chief Executive two weeks prior to the drilling of additional wells on the site.

Consent 4073-2

- 8. That the consent holder shall advise the Chief Executive two weeks prior to discharging production water to the Ngatoro Stream as licensed by this consent.
- 9. That the Taranaki Regional Council may review any or all of the conditions of this consent by giving notice of review during the month of June 2003 and/or June 2009, for the purpose of ensuring that the conditions are adequate to deal with any significant adverse effects of the discharge on the environment arising from the exercise of this consent, which were not foreseen at the time the application was considered and which it was not appropriate to deal with at that time.

Transferred at Stratford on 23 February 2004

For and on behalf of Taranaki Regional Council	
Director – Resource Management	_

Water Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Greymouth Petroleum Acquisition Company Limited

Consent Holder: PO Box 3394

New Plymouth 4341

Decision Date: 24 July 2014

Commencement Date: 24 July 2014

Conditions of Consent

Consent Granted: To take groundwater from the Matemateaonga Formation for

use in enhanced hydrocarbon recovery activities at the

Kaimiro-O wellsite

Expiry Date: 01 June 2032

Review Date(s): June 2020, June 2026

Site Location: Kaimiro-O wellsite, 455 Alfred Road, Egmont Village

(Property owner: St Leger Manning Reeves & Robert Baker)

Legal Description: Pt Sec 115-116 Hua & Waiwhakaiho Hun (Site of take)

Grid Reference (NZTM) 1698651E-5663191N

Catchment: Waiwhakaiho

For General, Standard and Special conditions pertaining to this consent please see reverse side of this document

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

- 1. The total volume of water taken from the bore shall not exceed 550 cubic metres per day and/or 6.4 litres/second.
- 2. The bore shall be easily identifiable by permanent labels, which may be welded or engraved on the casing, or on the equivalent fixed part of the bore construction or associated building. The numbering on the label shall be the bore number assigned by the Taranaki Regional Council (GND2456).
- 3. Prior to exercising this consent the consent holder shall install, and thereafter maintain a water meter and a datalogger at the site of taking. The water meter and datalogger shall be tamper-proof and shall measure and record the rate and volume of water taken to an accuracy of \pm 5%.

Note: Water meters and dataloggers must be installed, and regularly maintained, in accordance with manufacturer's specifications in order to ensure that they meet the required accuracy. Even with proper maintenance water meters have a limited lifespan.

- 4. The records of water taken shall:
 - a. be in a format that, in the opinion of the Chief Executive, Taranaki Regional Council, is suitable for auditing;
 - b. specifically record the water taken as 'zero' when no water is taken; and
 - c. for each 12-month period ending on 30 June, be provided to the Chief Executive, Taranaki Regional Council within one month after end of that period.
- 5. Within 30 days of the installation of a water meter or datalogger, and at other times when reasonable notice is given, the consent holder shall provide the Chief Executive, Taranaki Regional Council with a document from a suitably qualified person certifying that:
 - a. water measuring or recording equipment required by the conditions of this consent has been installed and/or maintained in accordance with the manufacturer's specifications; and/or
 - b. water measuring or recording equipment required by the conditions of this consent has been tested and shown to be operating to an accuracy of \pm 5%.
- 6. The water meter and datalogger shall be accessible to Taranaki Regional Council officer's at all reasonable times for inspection and/or data retrieval.
- 7. If any measuring or recording equipment breaks down, or for any reason is not operational, the consent holder shall advise the Chief Executive, Taranaki Regional Council immediately. Any repairs or maintenance to this equipment must be undertaken by a suitably qualified person.

Consent 5384-2.0

- 8. At all times the consent holder shall adopt the best practicable option (BPO) to prevent or minimise any actual or likely adverse effect on the environment associated with the abstraction of groundwater, including, but not limited to, the efficient and conservative use of water.
- 9. This consent shall lapse on 30 September 2019, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.
- 10. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2020 and/or June 2026 for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Signed at Stratford on 24 July 2014

For and on behalf of Taranaki Regional Council

A D McLay

Director - Resource Management

Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Greymouth Petroleum Limited

Consent Holder: P O Box 3394

NEW PLYMOUTH 4341

Consent Granted

Date:

9 May 2008

Conditions of Consent

Consent Granted: To discharge emissions to air during flaring from well

workovers and in emergency situations and miscellaneous emissions associated with production activities at the Ngatoro-B wellsite at or about 2612457E-6222691N

Expiry Date: 1 June 2027

Review Date(s): June 2015, June 2021

Site Location: Ngatoro-B wellsite, Bedford Road North, Inglewood

[Property owner: CJ & GD Alexander]

Legal Description: Sec 128 Pt Secs 126 & 127 Moa Dist Blk VIII Egmont SD

General conditions

- a) On receipt of a requirement from the Chief Executive, Taranaki Regional Council the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) Unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) The consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

Information and notification

- 1. The consent holder shall notify the Chief Executive, Taranaki Regional Council, whenever the continuous flaring of hydrocarbons [other than purge gas] is expected to occur for more than five minutes in duration. Notification shall be no less than 24 hours before the flaring commences. Notification shall include the consent number and be emailed to worknotification@trc.govt.nz. Notification by fax or post is acceptable if the consent holder does not have access to email.
- 2. At least 24 hours before any flaring, other than in emergencies, the consent holder shall provide notification to all residents within 1000 metres of the site of the commencement of flaring. The consent holder shall include in the notification a 24-hour contact telephone number for a representative of the consent holder, and shall keep and make available to the Chief Executive, Taranaki Regional Council, a record of all queries and complaints received in respect of any flaring activity.
- 3. No alteration shall be made to plant equipment or processes which may substantially alter the nature or quantity of flare emissions or other site emissions, including but not limited to the recovery of produced gas, other than as authorised by this consent, without prior consultation with the Chief Executive, Taranaki Regional Council.

Emissions from the site

- 4. Other than for the maintenance of a pilot flare flame, the consent holder shall have regard to the prevailing and predicted wind speed and direction at the time of initiation of, and throughout, any episode of flaring so as to minimise offsite effects.
- 5. All gas that is flared must first be treated by effective liquid and solid separation and recovery to ensure that smoke emission during flaring is minimised.

- 6. If separation required by special condition 5 cannot be implemented or maintained at any time while there is a flow from the well, whether natural or induced, then the consent holder shall immediately advise the Compliance Manager, Taranaki Regional Council, and shall in any case re-establish liquid and solid separation and recovery within three hours.
- 7. Subject to special condition 6, no liquid or solid hydrocarbons shall be combusted through the gas flare system, other than in an emergency.
- 8. The consent holder shall adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or potential effect on the environment arising from any emission to air from the flare or any other emissions to air from the Ngatoro-B wellsite [including use of a separator during well clean-up].
- 9. Only substances originating from the well stream and treated as outlined by conditions 5, 6, 7, and 8 shall be combusted within the flare pit.
- 10. There shall not be any offensive odour or smoke, as determined by an enforcement officer of the Taranaki Regional Council, at or beyond the boundary of the property where the wellsite is located.
- 11. All hydrocarbon storage vessels shall be fitted with vapour recovery systems.
- 12. The opacity of any smoke emissions shall not exceed a level of 1 as measured on the Ringelmann Scale.
- 13. The consent holder shall control all emissions of carbon monoxide to the atmosphere from the flare so that, whether alone or in conjunction with any other emissions from the wellsite, the maximum ground level concentration of carbon monoxide arising from the exercise of this consent measured under ambient conditions does not exceed 10 milligrams per cubic metre [mg/m³] [eight-hour average exposure], or 30 mg/m³ one-hour average exposure] at or beyond the boundary of the property where the wellsite is located.
- 14. The consent holder shall control all emissions of nitrogen oxides to the atmosphere from the flare so that, whether alone or in conjunction with any other emissions from the wellsite, the maximum ground level concentration of nitrogen dioxide arising from the exercise of this consent measured under ambient conditions does not exceed 100 micrograms per cubic metre [$\mu g/m^3$] [24-hour average exposure], or 200 $\mu g/m^3$ [1-hour average exposure] at or beyond the boundary of the of the property where the wellsite is located.
- 15. The consent holder shall control emissions to the atmosphere, from the production station and flare, of contaminants other than carbon dioxide, carbon monoxide, and nitrogen oxides so that, whether alone or in conjunction with any other emissions from the production station, is not hazardous or toxic or noxious at or beyond the boundary of the property.

- 16. The consent holder shall control emissions to the atmosphere from the wellsite and flare of contaminants other than carbon dioxide, carbon monoxide, and nitrogen oxides so that, whether alone or in conjunction with any emissions from the flare, the maximum ground level concentration for any particular contaminant arising from the exercise of this consent measured at or beyond the boundary of the property where the wellsite is located, is not increased above background levels:
 - a) by more than 1/30th of the relevant Occupational Threshold Value-Time Weighted Average, or by more than the Short Term Exposure Limit at any time [all terms as defined in Workplace Exposure Standards, 2002, Department of Labour]; or
 - b) if no Short Term Exposure Limit is set, by more than three times the Time Weighted Average at any time [all terms as defined in Workplace Exposure Standards, 2002, Department of Labour].

Recording and reporting information

- 17. The consent holder shall make available to the Chief Executive, Taranaki Regional Council, upon request, an analysis of a typical gas and condensate stream from the field, covering sulphur compound content and the content of carbon compounds of structure C₆ or higher number of compounds.
- 18. Each time there is visible smoke as a result of the exercise of this consent, the consent holder shall record the time, duration and cause. The consent holder shall make the record available to the Chief Executive, Taranaki Regional Council, upon request.
- 19. The consent holder shall record and maintain a log of all continuous flaring events longer than five minutes duration, and any intermittent flaring lasting for an aggregate of ten minutes or longer in any 120-minute period. The log shall contain the date, the start and finish times of the flaring event, the quantity and type of material flared, and the reason for flaring. The log shall be made available to the Chief Executive, Taranaki Regional Council, upon request, and summarised annually in the report required under condition 20.
- 20. The consent holder shall provide to the Taranaki Regional Council during May of each year, for the duration of this consent, a report:
 - i) detailing any energy efficiency measures implemented on the site;
 - ii) detailing smoke emissions as required under condition 18;
 - iii) detailing any measures undertaken or proposed to reduce smoke emissions;
 - iv) detailing any measures undertaken or proposed to reduce flaring;
 - v) addressing any other issue relevant to the minimisation or mitigation of emissions from the flare;
 - vi) detailing any complaints received and any measures undertaken to address complaints; and
 - vii) reviewing all options and technological advances relevant to the reduction or mitigation of any discharge to air from the site, how these might be applicable and/or implemented at the site, and the benefits and costs of these advances.

Lapse and Review

- 21. This consent shall lapse five years after the date of issue of this consent, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.
- 22. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent within six months of receiving a report prepared by the consent holder pursuant to condition 20 of this consent, and/or by giving notice of review during the month of June 2015 and/or June 2021, for any of the following purposes:
 - a) dealing with any significant adverse effect on the environment arising from the exercise of the consent which was not foreseen at the time the application was considered or which it was not appropriate to deal with at the time;
 - b) requiring the consent holder to adopt the best practicable option to remove or reduce any adverse effect on the environment caused by the discharge;
 - c) to alter, add or delete limits on mass discharge quantities or discharge or ambient concentrations of any contaminant;
 - d) taking into account any Act of Parliament, regulation, national policy statement or national environmental standard which relates to limiting, recording, or mitigating emissions of gases which are products of combustion, and which is relevant to the air discharge from the Ngatoro-B wellsite.

Signed at Stratford on 9 May 2008

For and on behalf of
Taranaki Regional Council
C
Director-Resource Management

Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Greymouth Petroleum Limited

Consent Holder: P O Box 3394

NEW PLYMOUTH 4341

Consent Granted

Date:

12 May 2008

Conditions of Consent

Consent Granted: To discharge emissions to air during flaring from well

workovers and in emergency situations and miscellaneous emissions associated with production activities at the Ngatoro-A wellsite at or about 2611074E-6221732N

Expiry Date: 1 June 2027

Review Date(s): June 2015, June 2021

Site Location: Ngatoro-A wellsite, Dudley Road, Inglewood

[Property owners: GD & VK Robinson]

Legal Description: Sec 11 Blk VIII Egmont SD

General conditions

- a) On receipt of a requirement from the Chief Executive, Taranaki Regional Council the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) Unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) The consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

Information and notification

- 1. The consent holder shall notify the Chief Executive, Taranaki Regional Council, whenever the continuous flaring of hydrocarbons [other than purge gas] is expected to occur for more than five minutes in duration. Notification shall be no less than 24 hours before the flaring commences. Notification shall include the consent number and be emailed to worknotification@trc.govt.nz. Notification by fax or post is acceptable if the consent holder does not have access to email.
- 2. At least 24 hours before any flaring, other than in emergencies, the consent holder shall provide notification to all residents within 1000 metres of the site of the commencement of flaring. The consent holder shall include in the notification a 24-hour contact telephone number for a representative of the consent holder, and shall keep and make available to the Chief Executive, Taranaki Regional Council, a record of all queries and complaints received in respect of any flaring activity.
- 3. No alteration shall be made to plant equipment or processes which may substantially alter the nature or quantity of flare emissions or other site emissions, including but not limited to the recovery of produced gas, other than as authorised by this consent, without prior consultation with the Chief Executive, Taranaki Regional Council.

Emissions from the site

- 4. Other than for the maintenance of a pilot flare flame, the consent holder shall have regard to the prevailing and predicted wind speed and direction at the time of initiation of, and throughout, any episode of flaring so as to minimise offsite effects.
- 5. All gas that is flared must first be treated by effective liquid and solid separation and recovery to ensure that smoke emission during flaring is minimised.

- 6. If separation required by special condition 5 cannot be implemented or maintained at any time while there is a flow from the well, whether natural or induced, then the consent holder shall immediately advise the Compliance Manager, Taranaki Regional Council, and shall in any case re-establish liquid and solid separation and recovery within three hours.
- 7. Subject to special condition 6, no liquid or solid hydrocarbons shall be combusted through the gas flare system, other than in an emergency.
- 8. The consent holder shall adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or potential effect on the environment arising from any emission to air from the flare or any other emissions to air from the Ngatoro-A wellsite [including use of a separator during well clean-up].
- 9. Only substances originating from the well stream and treated as outlined by conditions 5, 6, 7, and 8 shall be combusted within the flare pit.
- 10. There shall not be any offensive odour or smoke, as determined by an enforcement officer of the Taranaki Regional Council, at or beyond the boundary of the property where the wellsite is located.
- 11. All hydrocarbon storage vessels shall be fitted with vapour recovery systems.
- 12. The opacity of any smoke emissions shall not exceed a level of 1 as measured on the Ringelmann Scale.
- 13. The consent holder shall control all emissions of carbon monoxide to the atmosphere from the flare so that, whether alone or in conjunction with any other emissions from the wellsite, the maximum ground level concentration of carbon monoxide arising from the exercise of this consent measured under ambient conditions does not exceed 10 milligrams per cubic metre [mg/m³] [eight-hour average exposure], or 30 mg/m³ one-hour average exposure] at or beyond the boundary of the property where the wellsite is located.
- 14. The consent holder shall control all emissions of nitrogen oxides to the atmosphere from the flare so that, whether alone or in conjunction with any other emissions from the wellsite, the maximum ground level concentration of nitrogen dioxide arising from the exercise of this consent measured under ambient conditions does not exceed 100 micrograms per cubic metre [$\mu g/m^3$] [24-hour average exposure], or 200 $\mu g/m^3$ [1-hour average exposure] at or beyond the boundary of the of the property where the wellsite is located.
- 15. The consent holder shall control emissions to the atmosphere, from the production station and flare, of contaminants other than carbon dioxide, carbon monoxide, and nitrogen oxides so that, whether alone or in conjunction with any other emissions from the production station, is not hazardous or toxic or noxious at or beyond the boundary of the property.

- 16. The consent holder shall control emissions to the atmosphere from the wellsite and flare of contaminants other than carbon dioxide, carbon monoxide, and nitrogen oxides so that, whether alone or in conjunction with any emissions from the flare, the maximum ground level concentration for any particular contaminant arising from the exercise of this consent measured at or beyond the boundary of the property where the wellsite is located, is not increased above background levels:
 - a) by more than 1/30th of the relevant Occupational Threshold Value-Time Weighted Average, or by more than the Short Term Exposure Limit at any time [all terms as defined in Workplace Exposure Standards, 2002, Department of Labour]; or
 - b) if no Short Term Exposure Limit is set, by more than three times the Time Weighted Average at any time [all terms as defined in Workplace Exposure Standards, 2002, Department of Labour].

Recording and reporting information

- 17. The consent holder shall make available to the Chief Executive, Taranaki Regional Council, upon request, an analysis of a typical gas and condensate stream from the field, covering sulphur compound content and the content of carbon compounds of structure C₆ or higher number of compounds.
- 18. Each time there is visible smoke as a result of the exercise of this consent, the consent holder shall record the time, duration and cause. The consent holder shall make the record available to the Chief Executive, Taranaki Regional Council, upon request.
- 19. The consent holder shall record and maintain a log of all continuous flaring events longer than five minutes duration, and any intermittent flaring lasting for an aggregate of ten minutes or longer in any 120-minute period. The log shall contain the date, the start and finish times of the flaring event, the quantity and type of material flared, and the reason for flaring. The log shall be made available to the Chief Executive, Taranaki Regional Council, upon request, and summarised annually in the report required under condition 20.
- 20. The consent holder shall provide to the Taranaki Regional Council during May of each year, for the duration of this consent, a report:
 - i) detailing any energy efficiency measures implemented on the site;
 - ii) detailing smoke emissions as required under condition 18;
 - iii) detailing any measures undertaken or proposed to reduce smoke emissions;
 - iv) detailing any measures undertaken or proposed to reduce flaring;
 - v) addressing any other issue relevant to the minimisation or mitigation of emissions from the flare;
 - vi) detailing any complaints received and any measures undertaken to address complaints; and
 - vii) reviewing all options and technological advances relevant to the reduction or mitigation of any discharge to air from the site, how these might be applicable and/or implemented at the site, and the benefits and costs of these advances.

Lapse and Review

- 21. This consent shall lapse five years after the date of issue of this consent, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.
- 22. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent within six months of receiving a report prepared by the consent holder pursuant to condition 20 of this consent, and/or by giving notice of review during the month of June 2015 and/or June 2021, for any of the following purposes:
 - a) dealing with any significant adverse effect on the environment arising from the exercise of the consent which was not foreseen at the time the application was considered or which it was not appropriate to deal with at the time;
 - b) requiring the consent holder to adopt the best practicable option to remove or reduce any adverse effect on the environment caused by the discharge;
 - c) to alter, add or delete limits on mass discharge quantities or discharge or ambient concentrations of any contaminant;
 - d) taking into account any Act of Parliament, regulation, national policy statement or national environmental standard which relates to limiting, recording, or mitigating emissions of gases which are products of combustion, and which is relevant to the air discharge from the Ngatoro-A wellsite.

Signed at Stratford on 12 May 2008

For and on behalf of
Taranaki Regional Council
O
Director-Resource Management
O O

Appendix II Biomonitoring reports

To Job Manager, Callum MacKenzieFrom Technical Officer, Katie Blakemore

Report No KB004 Document 1678121 Date 2 May 2016

Biomonitoring of two unnamed tributaries of the Mangaoraka Stream in relation to the Kaimiro Production Station, March 2016

Introduction

This was the second of two biomonitoring surveys scheduled to be undertaken in the 2015-2016 monitoring year for the Kaimiro Production Station of Greymouth Petroleum (previously owned by Fletcher Challenge Energy Taranaki Limited). The Taranaki Regional Council has undertaken surveys since January 1985 in the tributaries of the Mangaoraka Stream that receive stormwater and wastewater from the production station area. During 1987 and 1988 oil seepage to these streams disrupted the aquatic communities. Biomonitoring was not undertaken for nearly four years following the oil seepage period, until 1992. The results of surveys performed since the 1998-99 monitoring year are discussed in the references at the end of this report.

Methods

This survey was undertaken on 1 March 2016 at three sites in two unnamed tributaries of the Mangaoraka Stream. Figure 1 shows the location of these sampling sites. Site 1 is the 'control' site which is located in a major tributary of the Mangaoraka Stream, upstream of the confluence with a more minor tributary. Site 2 is situated in the minor tributary which receives the stormwater discharge from the production station and site 3 is approximately 50 metres downstream of the confluence of this tributary (Table 1).

The Council's standard '400ml kick-sampling' technique was used at sites 1, 2 and 3 (Table 1). The 'kick-sampling' technique is very similar to Protocol C1 (hard-bottomed, semi-quantitative) of the New Zealand Macroinvertebrate Working Group (NZMWG) protocols for macroinvertebrate samples in wadeable streams (Stark *et al*, 2001).

Table 1 Biomonitoring sites in two tributaries of the Mangaoraka Stream in relation to discharges from the Kaimiro Production Station

Site	Site code	GPS reference (NZTM)	Location
1	MRK 000198	E1700117 N5664652	Major tributary approx. 50m u/s of confluence with minor tributary
2	MRK 000204	E1700054 N5664636	Minor tributary (receives discharge) 150m d/s of Upland Road
3	MRK 000207	E1700171 N5665679	Major tributary approx. 50m d/s of confluence with minor tributary

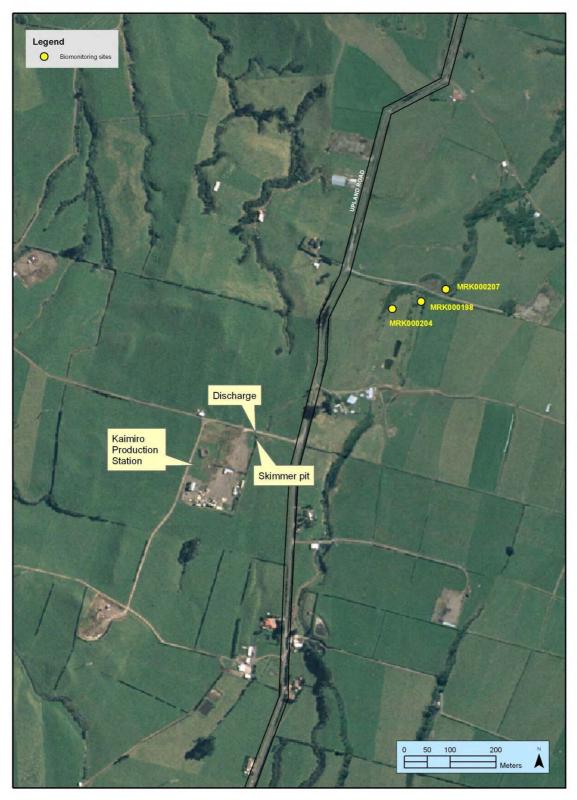


Figure 1 Biomonitoring sites in two unnamed tributaries of the Mangaoraka Stream related to the Kaimiro Production Station

Samples were preserved with Kahle's Fluid for later sorting and identification under a stereomicroscope according to Taranaki Regional Council methodology using protocol P1 of NZMWG protocols for sampling macroinvertebrates in wadeable streams (Stark et al. 2001). Macroinvertebrate taxa found in each sample were recorded based on the abundance categories in Table 2.

Table 2 Macroinvertebrate abundance categories

Abundance category	Number of individuals
R (rare)	1-4
C (common)	5-19
A (abundant)	20-99
VA (very abundant)	100-499
XA (extremely abundant)	>499

Stark (1985) developed a scoring system for macroinvertebrate taxa according to their sensitivity to organic pollution in stony New Zealand streams. Highly 'sensitive' taxa were assigned the highest scores of 9 or 10, while the most 'tolerant' forms scored 1. Sensitivity scores for certain taxa have been modified in accordance with Taranaki experience. By averaging the scores obtained from a list of taxa taken from one site and multiplying by a scaling factor of 20, a Macroinvertebrate Community Index (MCI) value was obtained. The MCI is a measure of the overall sensitivity of macroinvertebrate communities to the effects of organic pollution. However, other physical variables such as sedimentation, temperatures, water velocity, and dissolved oxygen levels may also affect the MCI values because the taxa that are able to tolerate extremes in these variables generally have lower sensitivity scores. More 'sensitive' communities inhabit less polluted waterways. A gradation of biological water quality conditions based upon MCI ranges which has been adapted for Taranaki streams and rivers (TRC, 2013) from Stark's classification (Stark, 1985; Boothroyd and Stark, 2000) (Table 3).

Table 3 Macroinvertebrate community health based on MCI ranges which has been adapted for Taranaki streams and rivers (TRC, 2013) from Stark's classification (Stark, 1985 and Boothroyd and Stark, 2000)

Grading	MCI
Excellent	>140
Very Good	120-140
Good	100-119
Fair	80-99
Poor	60-79
Very Poor	<60

A semi-quantitative MCI value (SQMCIs) has also been calculated for the taxa present at each site by multiplying each taxon score by a loading factor (related to its abundance), totalling these products, and dividing by the sum of the loading factors (Stark, 1998 and 1999). The loading factors were 1 for rare (R), 5 for common (C), 20 for abundant (A), 100 for very abundant (VA) and 500 for extremely abundant (XA). Unlike the MCI, the SQMCIs is not multiplied by a scaling factor of 20, so that its corresponding range of values is 20x lower.

Results and discussion

Site habitat characteristics and hydrology

This March 2016 survey followed a period of 12 days since a fresh in excess of both three times median flow and seven times median flow. This was the only fresh that occurred in the month preceding this survey. There was a steady, low flow at all three sites at the time of the survey. Water temperatures were in the range 17.3 – 17.4°C at the time of the survey. Water was clear and uncoloured at site 1, and cloudy brown at sites 2 and 3. Substrate was predominantly cobble and gravels at site 1, with some silt, sand and boulder also present. At site 2, substrate was predominantly cobble, fine gravel, sand and silt, with small amounts of coarse gravel and boulder. Site 3 had predominantly cobble, sand and fine gravel, with small amounts of silt, coarse gravel, boulder and bedrock. There was a silt coating present at sites 2 and 3.

Site 1 had widespread moss, patchy leaves, no wood and macrophytes on the edges. Site 2 had no moss, patchy leaves and no wood or macrophytes, while site 3 had patchy moss, widespread leaves, patchy wood and no macrophytes. Periphyton mats were patchy at sites 1 and 2, and absent at site 3. Periphyton filaments were patchy at site 1 and absent at sites 2 and 3. There was no overhanging vegetation and no shading at site 1, while sites 2 and 3 had overhanging vegetation causing partial and complete shading of the streambed, respectively. Banks were undercut at all sites.

Macroinvertebrate communities

Most past surveys have shown that the larger tributary supports richer macroinvertebrate communities, including abundances of 'sensitive' mayflies. These results reflect the good habitat conditions normally provided by faster-flowing, stony-bedded streams on the upper to mid reaches of the ring plain. The smaller tributary has tended to support communities with lower numbers of taxa and smaller proportions of 'sensitive' taxa. This in part has been due to the slower flow and/or iron oxide deposition on the more sedimented stream bed of this tributary.

Table 4 provides a summary of the results from previous surveys sampled in relation to the Kaimiro Production Station discharges along with current survey results.

Table 4 Number of taxa, MCI and SQMCIs values for two unnamed tributaries of the Mangaoraka Stream, sampled in relation to the Kaimiro Production Station on 1 October 2015 and a summary of historical data for these sites.

Site No.	N		No of taxa			MCI value		Ç	SQMCI₅ valu	е
		Median	Range	Mar 2016	Median	Range	Mar 2016	Median	Range	Mar 2016
1	58	27	18-37	25	97	83-110	101	3.6	1.9-5.7	3.2
2	54	15	3-26	26	81	55-103	76	2.3	1.2-4.1	1.9
3	58	24	14-33	23	99	71-111	106	4.1	1.7-6.3	4.8

The full results of the current survey are presented in Table 5.

Table 5 Macroinvertebrate communities in two unnamed tributaries of the Mangaoraka Stream in relation to the Kaimiro Production Station on 1 March 2016

Site Code Sample Number Oligochaeta Lumbricidae Ferrissia Physa Potamopyrgus Ostracoda Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	MCI score 1 5 3 3 4 1 1 5 7 7 7 8 8 9 7 7 3 6 8 8 5	MRK000198 FWB16109 VA R A R - C R C R C R A A	MRK000204 FWB16110 VA	MRK000207 FWB16111 A R C A A R A
Oligochaeta Lumbricidae Ferrissia Physa Potamopyrgus Ostracoda Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	1 5 3 3 4 1 5 7 7 7 8 9 7 3 6 8	VA R - A R - C R C R A	VA	A
Lumbricidae Ferrissia Physa Potamopyrgus Ostracoda Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	5 3 3 4 1 5 7 7 7 8 9 7 3 6	R	- R R C R R R R R R R R R R R	- R - C A A R
Ferrissia Physa Potamopyrgus Ostracoda Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	3 3 4 1 5 7 7 7 8 9 7 3 6	- A R - C R C R A	R R C R - - - R	- C A A R
Physa Potamopyrgus Ostracoda Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	3 4 1 5 7 7 7 8 9 7 3 6	- A R - C R C R A	R R C R - - - R	- C A A R
Physa Potamopyrgus Ostracoda Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	3 4 1 5 7 7 7 8 9 7 3 6	A R C C R C R A	R C R R	- C A A R
Potamopyrgus Ostracoda Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	1 5 7 7 8 9 7 3 6	R - C R C R - A	C R - - - - R	- - A A R
Ostracoda Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	1 5 7 7 8 9 7 3 6	R - C R C R - A	C R - - - - R	A A R
Paranephrops Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	5 7 7 8 9 7 3 6	- C R C R A -	R R	A A R
Austroclima Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	7 7 8 9 7 3 6	R C R A	- - - - R	A A R
Coloburiscus Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	7 8 9 7 3 6	R C R A	- - - R	A R
Deleatidium Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	8 9 7 3 6	C R A	- R	R -
Nesameletus Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	9 7 3 6 8	R A -	R	-
Zephlebia group Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	7 3 6 8	A -	R	
Microvelia Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	3 6 8	-		
Elmidae Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	6 8		IX.	R
Hydraenidae Hydrophilidae Ptilodactylidae Scirtidae	8	A	-	R
Hydrophilidae Ptilodactylidae Scirtidae				
Ptilodactylidae Scirtidae	5	-	-	R
Scirtidae		-	R	-
	8	R	-	R
1	8		-	R
Archichauliodes	7	R	-	С
Hydropsyche (Aoteapsyche)	4	С	R	A
		С	-	R
		-	-	С
		R		-
	5	-	R	-
	2	С	R	-
	5	R	-	R
Triplectides	5	R	-	-
Aphrophila	5	С	R	-
Eriopterini	5	-	-	R
Hexatomini	5	R	-	-
Limonia	6	-	С	-
Zelandotipula	6	-	R	-
Chironomus	1	-	А	-
Harrisius	6	-	R	-
Orthocladiinae	2	А	VA	R
Polypedilum	3	-	R	А
	5	R	R	-
31	3	-		-
		-		-
		-		-
				-
		-		-
				A
				R
•				R
/ Iodillia				
				23
	MCI	101	76	106
	SQMCIs	3.2	1.9	4.8
				8
	70EPI (taxa)		y sensitive' taxa	35
	Hydrobiosis Hydropsyche (Orthopsyche) Polyplectropus Oeconesidae Oxyethira Pycnocentrodes Triplectides Aphrophila Eriopterini Hexatomini Limonia Zelandotipula Chironomus Harrisius Orthocladiinae Polypedilum Tanypodinae Culicidae Paradixa Empididae Muscidae Psychodidae Austrosimulium Tanyderidae Acarina	Hydrobiosis 5 Hydropsyche (Orthopsyche) 9 Polyplectropus 6 Oeconesidae 5 Oxyethira 2 Pycnocentrodes 5 Triplectides 5 Aphrophila 5 Eriopterini 5 Hexatomini 5 Limonia 6 Zelandotipula 6 Chironomus 1 Harrisius 6 Orthocladiinae 2 Polypedilum 3 Tanypodinae 5 Culicidae 3 Paradixa 4 Empididae 3 Muscidae 3 Psychodidae 1 Austrosimulium 3 Tanyderidae 4 Acarina 5 No of taxa MCI SQMCIs EPT (taxa) %EPT (taxa)	Hydrobiosis 5 C Hydropsyche (Orthopsyche) 9 - Polyplectropus 6 R Oeconesidae 5 - Oxyethira 2 C Pycnocentrodes 5 R Triplectides 5 R Aphrophila 5 C Eriopterini 5 - Hexatomini 5 R Limonia 6 - Zelandotipula 6 - Chironomus 1 - Harrisius 6 - Orthocladiinae 2 A Polypedilum 3 - Tanypodinae 5 R Culicidae 3 - Paradixa 4 - Empididae 3 - Musidae 3 - Psychodidae 1 - Austrosimulium 3 C Tanyderidae 4	Hydrobiosis 5

R = Rare C = Common A = Abundant VA = Very Abundant XA = Extremely Abundant

Site 1

A moderate taxa richness of 25 taxa was recorded at this 'control' site at the time of the survey, which two less than the median taxa richness for this site (median taxa richness 27; Table 4). This is one taxon more than recorded in the previous sample (Figure 2). The macroinvertebrate community at the time of sampling was characterised by five taxa, two 'moderately sensitive' taxa [mayfly (*Zephlebia*) and beetle (Elmidae)] and three 'tolerant' taxa [oligochaete worms, snail (*Potamopyrgus*) and midge (Orthocladiinae)] (Table 5).

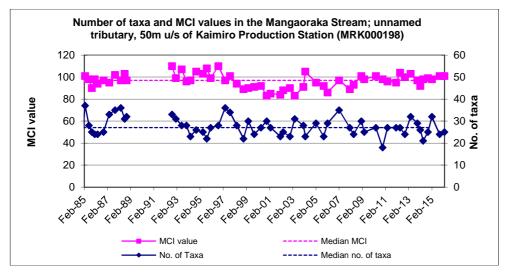


Figure 2 MCI scores and taxa richness at site 1, 50m upstream of Kaimiro Production Station discharge (MRK000198)

The MCI score of 101 units indicated a 'good' macroinvertebrate community health and was not significantly different to the median score for this site (median MCI score 97; Table 4). This score was the same as that recorded in the previous survey (Figure 2). The SQMCI_s score of 3.2 was similar to the median value calculated for this site (median SQMCI_s score 3.6; Table 4).

Site 2

A moderate taxa richness of 26 taxa was recorded at the time of this survey. This is higher than the median score (median taxa richness 15; Table 4) for this site and is equal to the highest recorded score at this site to date (Table 4; Figure 3). The macroinvertebrate community at the time of sampling was characterised by four 'tolerant' taxa [worms (Oligochaeta), midges (*Chironomus* and Orthocladiinae) and mosquito larvae (Culicidae)] (Table 5).

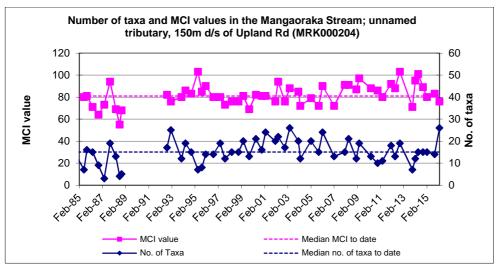


Figure 3 MCI scores and taxa richness at site 2, 150m downstream of Upland Rd (MRK000204)

The MCI score of 76 units indicated a 'poor' macroinvertebrate community health. This score is similar to the median for this site (median MCI score 81; Table 4) and to the value of 83 units recorded in the previous survey (Figure 3). The $SQMCI_s$ score of 1.9 units was lower than the median score (median $SQMCI_s$ 2.3; Table 4) and the score of 2.3 recorded in the previous survey.

Site 3

A moderate taxa richness of 23 taxa was recorded in this survey. This is one taxon less than the median taxa richness for this site (median taxa richness 24, Table 4) and is five taxa more than previously recorded at this site (Figure 4). The macroinvertebrate community at the time of sampling was characterised by seven taxa, three 'moderately sensitive' taxa [mayflies (*Austroclima*, *Coloburiscus* and *Zephlebia* group) and four 'tolerant' taxa [worm (Oligochaeta), caddisfly (*Hydropsyche* – formerly *Aoteapsyche*), midge (*Polypedilum*), and sandfly (*Austrosimulium*)].

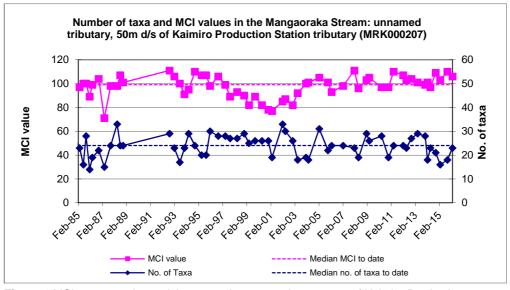


Figure 4 MCI scores and taxa richness at site 3, 50m downstream of Kaimiro Production Station tributary confluence (MRK000207)

The recorded MCI score of 106 categorises the site as having 'good' macroinvertebrate community health. This is similar to the median MCI score of 99 for this site (Table 4) and to the value of 110 recorded in the previous survey (Figure 4). The SQMCI $_{\rm s}$ score of 4.8 was not significantly higher then the median score for this site (median SQMCI $_{\rm s}$ score 4.1; Table 4) or to the previously recorded score of 4.1 units.

Discussion and conclusions

The Council's 'kick-sampling' technique was used at three sites to collect benthic macroinvertebrates from two unnamed tributaries of the Mangaoraka Stream in relation to discharges from the Kaimiro Production Station. This has provided data to assess any potential impacts the consented discharges have had on the macroinvertebrate communities of the stream. Samples were processed to provide number of taxa (taxa richness), MCI and SQMCI_s scores for each site.

Taxa richness is the most robust index when determining whether a macroinvertebrate community has been exposed to toxic discharges. Macroinvertebrates when exposed to toxic discharges may die and be swept downstream or may deliberately drift downstream as an avoidance mechanism (catastrophic drift). The MCI is a measure of the overall sensitivity of the macroinvertebrate community to organic pollution in stony streams. It is based on the presence/absence of taxa with varying degrees of sensitivity to environmental conditions. The SQMCI_s takes into account relative abundances of taxa as well as sensitivity to pollution. Significant differences in taxa richness, MCI or SQMCI_s between sites may indicate the degree of adverse effects (if any) of the discharge being monitored.

Most of the previous surveys undertaken in relation to the Kaimiro Production Station stormwater discharge have shown that the larger tributary of the Mangaoraka Stream (sites 1 and 3) supports higher taxonomic richnesses and healthier macroinvertebrate communities. The results of this summer survey are partially in agreement with these previous results, with site 2 having the lowest MCI and SQMCI_s scores of the sites, but slightly higher taxonomic richness. Both MCI and SQMCI_s were similar to median scores for site 2, while taxonomic richness was substantially higher than the median for this site. This reflects a high number of 'tolerant' taxa found at site 2 on this occasion. Iron oxide deposition is often noted at site 2, but was not present on this sampling occasion. This may be reflected in the higher than median taxonomic richness, which was the highest of the three sites surveyed. However, site 2 did have significant sedimentation on the streambed which may have contributed to the high number of 'tolerant' taxa recorded at this site.

Sites 1 and 3 had similar taxonomic richness and MCI scores on this occasion, although SQMCI_s was significantly lower at site 1 than site 3. This is due to reduced abundances of 'tolerant'oligochaete worms and sandfly larvae and increased abundances of the 'moderately sensitive' mayflies *Austroclima* and *Coloburiscus* at site 3 compared to site 1, and is likely a reflection of habitat variability than differences in water quality between the two sites. This decreased score at site 1, the 'control' site, suggests that discharges from the Kaimiro Production Station have not had any recent detrimental effects on the macroinvertebrate communities of the two tributaries of the Mangaoraka Stream. The recorded scores for all three metrics were similar to respective medians for sites 1 and 3.

Overall, the results of this March 2016 survey suggest that the discharges from the Kaimiro Production Station have not had any recent detrimental effects on the macroinvertebrate

communities of the major and minor tributaries of the Mangaoraka Stream. Lower MCI and SQMCI_s scores at site 2 in the minor tributary are a reflection of differences in habitat quality between the two tributaries.

Summary

A macroinvertebrate survey was performed at three sites in two unnamed tributaries of the Mangaoraka Stream in relation to stormwater discharges from the Kaimiro Production Station. All three sites had similar taxonomic richness, while site 2 had significantly lower MCI and SQMCI_s scores than sites 1 and 3. This most likely reflects poorer habitat quality due to sediment deposition in the minor tributary where site 2 was located compared to the major tributary where sites 1 and 3 were located.

Taxonomic richness at sites 1 and 3 were similar to medians for these sites, while site 2 had substantially higher than median taxonomic richness, reflecting a lack of iron oxide at this site compared with previous surveys. MCI and SQMCI_s scores were similar to medians for all sites. Overall there is no evidence that discharges from the Kaimiro Production Station have had any recent detrimental effects on the macroinvertebrate communities of these two unnamed tributaries of the Mangaoraka Stream.

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To Job Manager, Callum MacKenzie From Freshwater Biologist, Darin Sutherland

Report No DS034 Doc No 1579944 Date October 2015

Biomonitoring of two unnamed tributaries of the Mangaoraka Stream in relation to the Kaimiro Production Station, October 2015

Introduction

This was the first of two biomonitoring surveys scheduled to be undertaken in the 2015-2016 monitoring year for the Kaimiro Production Station of Greymouth Petroleum (previously owned by Fletcher Challenge Energy Taranaki Limited). The Taranaki Regional Council has undertaken surveys since January 1985 in the tributaries of the Mangaoraka Stream that receive stormwater and wastewater from the production station area. During 1987 and 1988 oil seepage to these streams disrupted the aquatic communities. Biomonitoring was not undertaken for nearly four years following the oil seepage period, until 1992. The results of surveys performed since the 1998-99 monitoring year are discussed in the references at the end of this report.

Methods

This survey was undertaken on 1 October 2015 at three sites in two unnamed tributaries of the Mangaoraka Stream. Figure 1 shows the location of these sampling sites. Site 1 is the 'control' site which is located in a major tributary of the Mangaoraka Stream, upstream of the confluence with a more minor tributary. Site 2 is situated in the minor tributary which receives the stormwater discharge from the production station and site 3 is approximately 50 metres downstream of the confluence of this tributary (Table 1).

The Council's standard '400ml kick-sampling' technique was used at sites 1, 2 and 3 (Table 1). The 'kick-sampling' technique is very similar to Protocol C1 (hard-bottomed, semi-quantitative) of the New Zealand Macroinvertebrate Working Group (NZMWG) protocols for macroinvertebrate samples in wadeable streams (Stark *et al*, 2001).

Table 1 Biomonitoring sites in two tributaries of the Mangaoraka Stream in relation to discharges from the Kaimiro Production Station

Site	Site code	GPS reference (NZTM)	Location
1	MRK 000198	E1700117 N5664652	Major tributary approx. 50m u/s of confluence with minor tributary
2	MRK 000204	E1700054 N5664636	Minor tributary (receives discharge) 150m d/s of Upland Road
3	MRK 000207	E1700171 N5665679	Major tributary approx. 50m d/s of confluence with minor tributary

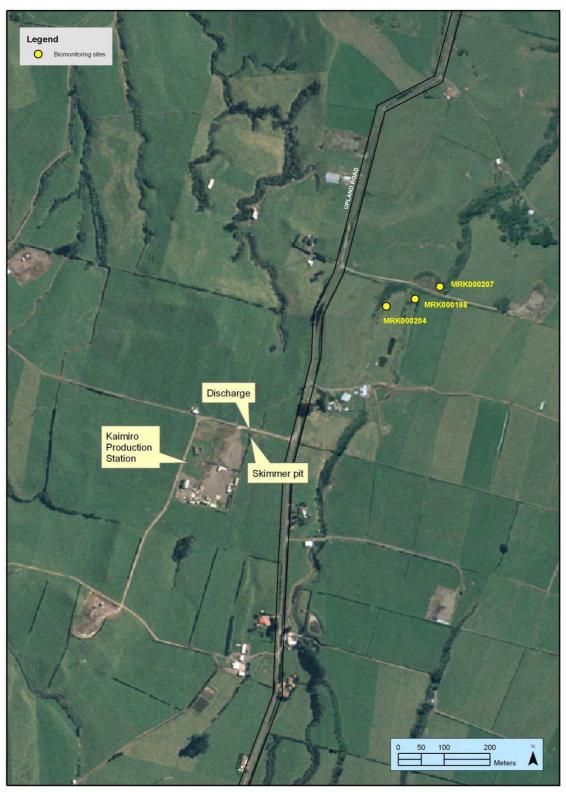


Figure 1 Biomonitoring sites in two unnamed tributaries of the Mangaoraka Stream related to the Kaimiro Production Station

Samples were preserved with Kahle's Fluid for later sorting and identification under a stereomicroscope according to Taranaki Regional Council methodology using protocol P1 of NZMWG protocols for sampling macroinvertebrates in wadeable streams (Stark et al. 2001). Macroinvertebrate taxa found in each sample were recorded as:

R (rare) = less than 5 individuals; C (common) = 5-19 individuals;

A (abundant) = estimated 20-99 individuals; VA (very abundant) = estimated 100-499 individuals; XA (extremely abundant) = estimated 500 individuals or more.

Stark (1985) developed a scoring system for macroinvertebrate taxa according to their sensitivity to organic pollution in stony New Zealand streams. Highly 'sensitive' taxa were assigned the highest scores of 9 or 10, while the most 'tolerant' forms scored 1. Sensitivity scores for certain taxa have been modified in accordance with Taranaki experience. Averaging the scores from a list of taxa taken from one site and multiplying by a scaling factor of 20 produces a Macroinvertebrate Community Index (MCI) value. A difference of 11 units or more in MCI values is considered significantly different (Stark 1998).

The MCI was designed for use in stony streams, and all sites sampled in this survey provided stony substrate. The MCI was designed as a measure of the overall sensitivity of macroinvertebrate communities to the effects of organic pollution, though sedimentation, temperatures, current speed, dissolved oxygen levels and some toxins can also affect the index values, because the taxa capable of tolerating extremes in these variables generally have low sensitivity scores. Usually more 'sensitive' communities inhabit less polluted waterways.

A semi-quantitative MCI value (SQMCI_s) has also been calculated for the taxa present at each site by multiplying each taxon score by a loading factor (related to its abundance), totalling these products, and dividing by the sum of the loading factors (Stark, 1998 and 1999). The loading factors were 1 for rare (R), 5 for common (C), 20 for abundant (A), 100 for very abundant (VA) and 500 for extremely abundant (XA). Unlike the MCI, the SQMCI_s is not multiplied by a scaling factor of 20, therefore SQMCI_s values range from 1 to 10, while MCI values range from 20 to 200.

Results

Site habitat characteristics and hydrology

This October 2015 survey followed a period of 13 days since a fresh in excess of three times median flow, and 28 days since a fresh in excess of seven times median flow. In the month prior to this survey, there had been four fresh events, two of which exceeded three times median flow and two which exceeded seven times median flow.

There was significant slumping of the banks upstream and downstream of site 1 and to a lesser extent site 2 which had been caused by stock damage. The bank slumping had been noted previously at site 1 in the October 2014 and May 2012 surveys and appears to be an ongoing issue at the site. There was also a dead cow in the stream immediately below site 1 at the time of the survey. The water temperatures were cool (11.4-11.9°C). Water levels were moderate and water speeds were variable among sampling sites. Water was uncoloured and clear for all sites during the survey. Site 1 had a substrate composition comprised mostly of silt and sand, site 2 had a substrate composition which was mainly silt and cobbles and site 3 had predominately silt, cobble and boulder substrate. There was iron oxide sediment covering the substrate at site 2. *Phormidium* sp cyanobacteria was also present at site 2 suggesting nutrient enrichment.

Site 1 had no moss and leaves, patchy wood and no macrophyte, site 2 had patchy moss, and no leaves, wood and macrophytes, and site 3 had patchy moss, leaves and wood and no macrophytes. Sites 1 and 2 had no shade or overhanging vegetation while sites 3 had complete shading from overhanging vegetation.

Macroinvertebrate communities

Most past surveys have shown that the larger tributary supports richer macroinvertebrate communities, including abundances of 'sensitive' mayflies. These results reflect the good habitat conditions normally provided by faster-flowing, stony-bedded streams on the upper to mid reaches of the ring plain. The smaller tributary has tended to support communities with lower numbers of taxa and smaller proportions of 'sensitive' taxa. This in part has been due to the slower flow and/or iron oxide deposition on the more sedimented stream bed of this tributary.

Table 2 provides a summary of the results from previous surveys sampled in relation to the Kaimiro Production Station discharges along with current survey results.

Table 2 Number of taxa, MCI and SQMCI_s values for two unnamed tributaries of the Mangaoraka Stream, sampled in relation to the Kaimiro Production Station on 1 October 2015 and a summary of historical data for these sites.

Site No.	N	No of taxa			MCI value			SQMCI₅ value		
		Median	Range	Oct 2015	Median	Range	Oct 2015	Median	Range	Oct 2015
1	57	27	18-37	24	97	83-110	101	3.5	1.9-5.2	5.7
2	53	15	3-26	14	81	55-103	83	2.2	1.2-4.1	2.3
3	57	24	14-33	18	99	71-111	110	4.2	1.7-6.3	4.1

Table 3 provides a summary of various macroinvertebrate indices within a specific altitudinal band for 'control' sites situated in Taranaki ring plain streams arising outside of Egmont National Park. The full results from the current survey are presented in Table 4.

Table 3 Range and median number of taxa, MCI values and SQMCIs scores for 'control' sites (Taranaki ring plain rivers/streams with sources outside Egmont National Park) at altitudes 200-249 m asl (TRC, 2015).

	No. of taxa	MCI value	$SQMCI_{\mathrm{s}}$ value
No. Samples	103	103	43
Range	2-37	60-116	1.9-6.7
Median	24	95	4.0

Table 4 Macroinvertebrate fauna of two unnamed tributaries of the Mangaoraka Stream in relation to Kaimiro Production Station sampled on 1 October 2015.

	Site Number		1	2	3
Taxa List	Site Code	MCI	MRK000198 FWB15242	MRK000204 FWB15243	MRK000207 FWB15244
	Sample Number	score			
NEMATODA	Nematoda	3	-	R	-
ANNELIDA (WORMS)	Oligochaeta	1	VA	VA	VA
· · · · · · · · · · · · · · · · · · ·	Lumbricidae	5	R	-	С
MOLLUSCA	Potamopyrgus	4	VA	С	R
	Sphaeriidae	3	R	-	-
CRUSTACEA	Ostracoda	1	-	R	-
	Paraleptamphopidae	5	R	-	-
	Paranephrops	5	R	-	-
EPHEMEROPTERA (MAYFLIES)	Austroclima	7	Α	-	А
, ,	Coloburiscus	7	-	-	А
	Deleatidium	8	-	-	R
	Zephlebia group	7	XA	Α	А
PLECOPTERA (STONEFLIES)	Acroperla	5	-	-	R
-1	Zelandobius	5	R	-	-
ODONATA (DRAGONFLIES)	Antipodochlora	5	R	-	-
HEMIPTERA (BUGS)	Anisops	5	R	-	-
COLEOPTERA (BEETLES)	Elmidae	6	С	-	-
,	Ptilodactylidae	8	-	-	R
MEGALOPTERA (DOBSONFLIES)	Archichauliodes	7	-	_	С
TRICHOPTERA (CADDISFLIES)	Hydropsyche (Aoteapsyche)	4	-	_	R
(3 2 2)	Ecnomidae/Psychomyiidae	6	-	R	-
	Hydrobiosis	5	R	R	R
	Hydropsyche (Orthopsyche)	9	С	_	А
	Polyplectropus	6	R	-	-
	Psilochorema	6	R	R	-
	Oxyethira	2	-	R	-
	Pycnocentria	7	R	_	R
	Triplectides	5	Α	R	-
DIPTERA (TRUE FLIES)	Aphrophila	5	R	R	R
	Eriopterini	5	R	_	-
	Hexatomini	5	R	R	-
	Paralimnophila	6		С	-
	Orthocladiinae	2	R	С	-
	Polypedilum	3	-	-	R
	Austrosimulium	3	С	_	R
	Tanyderidae	4	-	_	R
ACARINA (MITES)	Acarina	5	R	-	-
7.07.11.11.71 (1.11.1.20)	7 todima			14	10
		No of taxa	24	14	18
		MCI	101	83	110
		SQMCIs	5.7	2.3	4.1
		EPT (taxa)	9	5	9
		%EPT (taxa)	38	36	50
	'Moderately sensitive' taxa	()		y sensitive' taxa	L

 $R = Rare \qquad C = Common \qquad A = Abundant \qquad VA = Very \ Abundant \qquad XA = Extremely \ Abundant$

Site 1

A moderate macroinvertebrate community richness of 24 taxa was found at site 1 ('control' site) at the time of the survey which was three less than the median number recorded for the site (median taxa richness 27; Table 2). Taxa richness was the same as the median calculated from similar sites (median taxa richness 24; Table 3) and lower than the previous sample (taxa richness 32; Figure 2).

The MCI score of 101 units indicated a community of 'good' biological health which was not significantly different (Stark, 1998) to the median value calculated from previous surveys at the same site (median MCI score 97; Table 2) or compared with the previous survey (taxa richness 98; Figure 2). The SQMCI $_{\rm S}$ score of 5.7 units was higher (Stark, 1998) than the median value calculated from previous surveys at the same site (median SQMCI $_{\rm S}$ score of 3.5 units; Table 2) but similar to the previous survey score (SQMCI $_{\rm S}$ score of 5.2 units) which may indicate a prolonged improvement in this index at the site.

The community was characterised by two 'tolerant' taxa [oligochaete worms and snail (*Potamopyrgus*)] and three 'moderately sensitive' taxa [mayflies (*Austroclima* and *Zephlebia* group) and caddisfly (*Triplectides*)] (Table 4).

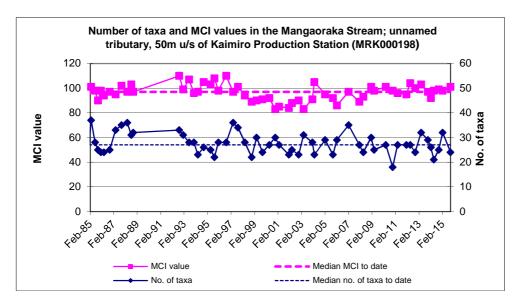


Figure 2 Number of taxa and MCI values in an unnamed tributary of the Mangaoraka Stream, 50 m upstream of Kaimiro Production Station (MRK000198)

Site 2

A moderately poor macroinvertebrate community richness of 14 taxa was found at site 2 ('primary impacted') at the time of the survey which was similar to the median number recorded for the site (median taxa richness 15; Table 2) and to the previous survey score (taxa richness 15; Figure 3). However, taxa richness was substantially lower than the median calculated from similar sites (taxa richness 24; Table 3).

The MCI score of 83 units indicated a community of 'fair' biological health which was not significantly different (Stark, 1998) to the median value calculated from previous surveys at the same site (median MCI score 81; Table 2). There was an insignificant increase (Stark, 1998) of three units from the previous survey (MCI score 80 units; Figure 3). The SQMCI_s score of 2.3

units was similar to the median value calculated from previous surveys at the same site (median $SQMCI_s$ score of 2.2 units; Table 2) and lower than the previous survey score ($SQMCI_s$ score of 3.4 units).

The community was characterised by one 'tolerant' taxon (oligochaete worms) and one 'moderately sensitive' taxon [mayfly (*Zephlebia* group) (Table 4).

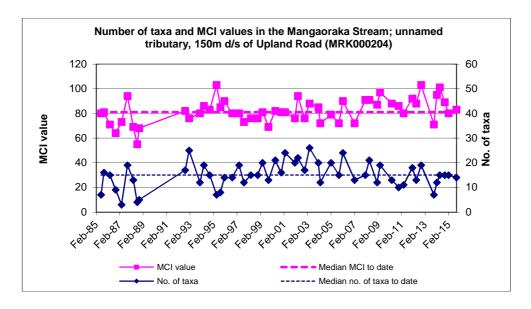


Figure 3 Number of taxa and MCI values in an unnamed tributary of the Mangaoraka Stream, 150 m d/s of Upland Road (MRK000204)

Site 3

A moderate macroinvertebrate community richness of 18 taxa was found at site 3 (secondary impacted site) at the time of the survey which was slightly lower than the median number recorded for the site (median taxa richness 24; Table 2) but similar to the previous survey score (taxa richness 16; Figure 3). Taxa richness was lower than the median calculated from similar sites (taxa richness 24; Table 3).

The MCI score of 110 units indicated a community of 'good' biological health which was significantly higher (Stark, 1998) than the median value calculated from previous surveys at the same site (median MCI score 99; Table 2). There was an insignificant increase (Stark, 1998) of seven units from the previous survey (MCI score 103 units; Figure 4). The SQMCI_s score of 4.1 units was similar to the median value calculated from previous surveys at the same site (median SQMCI_s score of 4.2 units; Table 2) and lower than the previous survey score (SQMCI_s score of 6.3 units).

The community was characterised by one 'tolerant' taxon (oligochaete worms), three 'moderately sensitive' taxa [mayflies (*Austroclima, Coloburiscus* and *Zephlebia* group)], and one 'highly sensitive' taxon [caddisfly (*Hydropsyche - Orthopsyche*)] (Table 4).

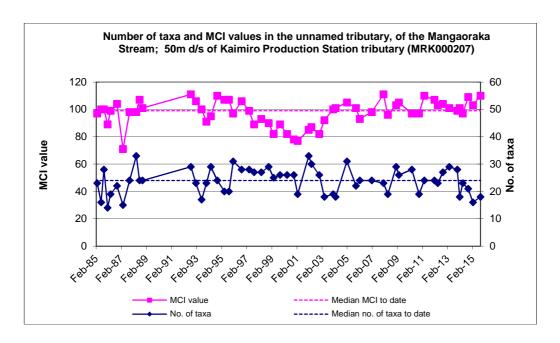


Figure 4 Number of taxa and MCI values in an unnamed tributary of the Mangaoraka Stream, 50 m d/s of Kaimiro Production Station tributary (MRK000207).

Discussion

The Council's 'kick-sampling' technique was used at three sites to collect streambed macroinvertebrates from two unnamed tributaries of the Mangaoraka Stream in relation to the Kaimiro Production Station. This has provided data to assess any potential impacts the consented activities have had on the macroinvertebrate communities of the stream. Samples were processed to provide number of taxa (richness), MCI, and SQMCI_S scores for each site.

Taxa richness is the most robust index when ascertaining whether a macroinvertebrate community has been exposed to toxic discharges. Macroinvertebrates when exposed to toxic chemicals may die and be swept downstream or deliberately drift downstream as an avoidance mechanism (catastrophic drift). The MCI is a measure of the overall sensitivity of the macroinvertebrate community to the effects of organic pollution in stony streams. It is based on the presence/absence of taxa with varying degrees of sensitivity to environmental conditions. The SQMCI_S takes into account taxa abundances as well as sensitivity to pollution. Significant differences in either the taxa richness, MCI or the SQMCI_S between sites may indicate the degree of adverse effects (if any) of the discharge being monitored.

Most of the previous surveys undertaken in relation to the Kaimiro Production Station stormwater discharge have shown that the larger tributary of the Mangaoraka Stream (sites 1 and 3) supports higher taxonomic richnesses and healthier macroinvertebrate communities. The results of this spring survey were consistent with these trends with taxa richnesses, MCI and SQMCIs scores recorded at sites 1 and 3 higher than those recorded at site 2 in the minor unnamed tributary of the Mangaoraka Stream. Site 2 ('primary impacted' site) has been affected to some extent by sedimentation of the streambed from iron-oxide deposits. In this survey the site's substrate was composed of 30% silt and the hard substrate (gravels, cobbles and boulders) had a coating of iron oxide sediment which probably contributed to the lower taxa richness and abundances found at the site compared with site 1 (upstream 'control' site) and site 3 (downstream 'secondary impacted' site).

Taxonomic richness at site 1 was slightly higher than site 3 (by six taxa) at the time of the survey. Normally site 1 has slightly more taxa recorded than site 3 (site 1 median taxa richness of 27 versus site 3 median taxa richness of 24) so this result is largely congruent with past results.

There was a non-significant difference (Stark, 1998) in MCI scores between sites 1 and 3 suggesting that no organic enrichment is occurring between the upstream and downstream sites. Site 1 had a higher SQMCI_s score than site 3 which was largely caused by the 'extremely abundant' *Zephlebia* group mayfly in the 'control' site sample. However, this result represented a higher than normal SQMCI_s score for site 1 rather than a decline at site 3 and probably relates more to habitat variation between site 1 and 3 rather than water quality differences.

Overall, the results of this October 2015 survey suggest that the Kaimiro Production Station has not had any recent detrimental effects on the macroinvertebrate communities of the minor and main tributary of the Mangaoraka Stream. Poorer macroinvertebrate indices found at the minor tributary would be a reflection of habitat differences, most likely from naturally occurring iron oxide deposition and differences in taxa richness between sites 1 and 3 may be a reflection of habitat variation between sites.

Summary

- A macroinvertebrate survey was performed at three sites in two unnamed tributaries of the Mangaoraka Stream in relation to stormwater discharges from the Kaimiro Production Station.
- Site 2 had substantially lower macroinvertebrate indices than sites 1 and 3 which is consistent with results from past surveys and is due to the minor tributary of the Mangaoraka Stream having high iron oxide levels which causes lower habitat quality for macroinvertebrates. The major tributary of the Mangaoraka Stream which sites 1 and 3 are situated on does no have the same iron oxide issue.
- Sites 1 and 3 macroinvertebrate indices were generally consistent with previous sampling results and there were only minor differences recorded between the two sites for taxa richness and MCI scores. Site 1 continued to show a higher than usual SQMCI_s score which was largely due to the mayfly *Zephlebia* group being recorded as 'extremely abundant'.
- Overall, there was no evidence for the Kaimiro Production Station discharges having had any recent detrimental effects on the macroinvertebrate communities of the minor and main tributary of the Mangaoraka Stream.

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Appendix III Air monitoring reports

Memorandum

To Job Manager, Callum MacKenzie

From Scientific Officer - Air Quality, Brian Cheyne

File 1720679 Date July 27, 2016

Ambient Gas (PM10, NOx, CO and LEL) Monitoring at Kaimiro Production Stations during 2015-2016 monitoring year

Introduction

In January 2016 and April 2016 as part of the compliance monitoring programme for the Kaimiro production station, a survey of ambient air quality sampling was carried out by the Taranaki Regional Council (the Council) in the vicinity of the plant. The main objectives were to measure:

- The concentrations of PM10 using a portable data logging TSI 'DustTrak';
- To measure the concentrations of the nitrogen oxides (NOx) using a passive sampling method, that gives a result for average exposure;
- And to measure carbon monoxide (CO) using a portable multi gas meter that provides instantaneous data throughout the monitoring period.

The findings of this study are presented in this memorandum, together with the locations of the monitoring sites which are provided in Figure 1.

Carbon monoxide (CO) and Lower explosive limit (LEL)

During the monitoring year, a multi-gas meter was deployed on one occasion in the vicinity of the plant. The deployment lasted approximately 72 hours, with the instrument placed in a down-wind position at the start of the deployment. Monitoring consisted of continuous measurements of gas concentrations for the gases of interest (carbon monoxide and combustible gases).

Because of the nature of the activities on the site, it was considered that the primary information of interest in respect of gases potentially emitted from the site was the average downwind concentration, rather than any instantaneous peak value. That is, the long-term exposure levels, rather than short-term maxima, are of most interest. The gas meter was therefore set up to create a data set based on recording the average concentration measured during each minute as raw data.

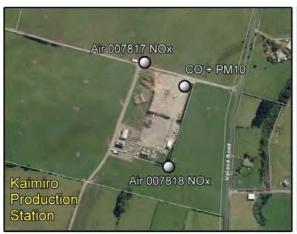




Figure 1 Air monitoring sites at Kaimiro production station (2015-2016)

The details of the sample run are summarised in Table 1 and the data from the sample run are presented graphically in Figure 2.

The consents covering air discharges from the Kaimiro production station have specific limits related to particular gases. Special condition 13 of consent 4048-3 set a limit on the carbon monoxide concentration at or beyond the production station's boundary. The limit is expressed as $10~\text{mg/m}^3$ for an eight hour average or $30~\text{mg/m}^3$ for a one hour average exposure. The maximum concentration of carbon monoxide found during the monitoring run was $17.6~\text{mg/m}^3$ with average concentration for the entire dataset was only $0.23~\text{mg/m}^3$ which comply with consent conditions. This is in line with the pattern found in previous years.

 Table 1
 Results of carbon monoxide and LEL monitoring at Kaimiro production station

	Period (from-to)	08/04/2016 15:34 to 11/04/2016 15:06
Мах	CO(ppm)	13.8
M	LEL(%)	0.10
Mean	CO(ppm)	0.20
Me	LEL(%)	0.00
ر	CO(ppm)	0.00
Min	LEL(%)	0.00

Note:

- (1) the instrument records in units of ppm. At 25°C, 1 atm. 1ppm CO = 1.145 mg/m^3
- (2) See text for explanation of LEL. Because the LEL of methane is equivalent to a mixture of approximately 5% methane in air, then the actual concentration of methane in air can be obtained by dividing the percentage LEL by 20.

LEL gives the percentage of the lower explosive limit, expressed as methane that is detected in the air sampled. The sensor on the instrument reacts to gases and vapours such as acetone, benzene, butane, methane, propane, carbon monoxide, ethanol, and higher alkanes and alkenes, with varying degrees of sensitivity. The Council's Regional Air Quality Plan has a typical requirement that no discharge shall result in dangerous levels of airborne contaminants, including any risk of explosion. At no time did the level of explosive gases downwind of the Kaimiro production station reach any more than a trivial level.

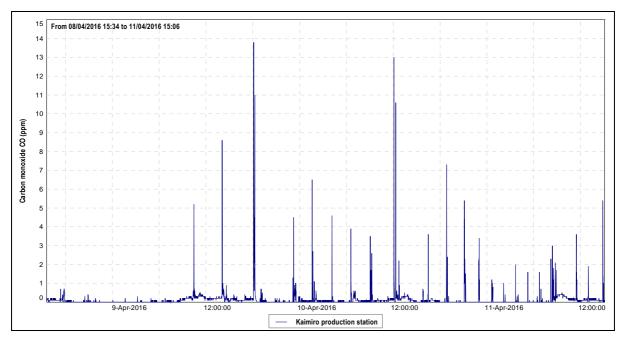


Figure 2 Graph of ambient CO levels in the vicinity of the Kaimiro Production Station

PM10

In September 2004 the Ministry for the Environment made public National Environmental Standards (NESs) relating to certain air pollutants. The NES for PM10 is $50 \,\mu g/m^3$ (24-hour average).

Particulates can be derived from many sources, including motor vehicles (particularly diesel), solid and oil-burning processes for industry and power generation, incineration and waste burning, photochemical processes, and natural sources such as pollen, abrasion, and sea spray.

PM10 particles are linked to adverse health effects that arise primarily from the ability of particles of this size to penetrate the defences of the human body and enter deep into the lungs significantly reducing the exchange of gases across the lung walls. Health effects from inhaling PM10 include increased mortality and the aggravation of existing respiratory and cardiovascular conditions such as asthma and chronic pulmonary diseases.

During the reporting period, a "DustTrak" PM10 monitor was deployed on one occasion in the vicinity of the Kaimiro production station. The deployment lasted approximately 64 hours, with the instrument placed in a down-wind position at the start of the deployment. Monitoring consisted of continual measurements of PM10 concentrations. The location of the "DustTrak" monitor during the sampling run is shown in Figure 1.

The details of the sample run are presented in Figure 3 and Table 2.

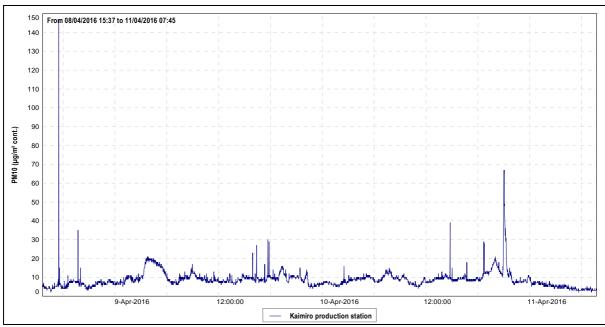


Figure 2PM10 concentrations (μg/m³) at the Kaimiro production station (2015-16)

	(64 hours) (08-11/04/2016)		
24 hr. set	Day 1	Day 2	
Daily average	8.82 µg/m³	8.56 µg/m³	
NES	50μg/m³		

 Table 1
 Daily mean of PM10 results during two days' monitoring at Kaimiro production station

During the 64-hour run, from 8^{th} of April to 11^{th} of April 2016, the average recorded PM_{10} concentration for the 24 hour period was $8.82\mu g/m^3$ and $8.56\mu g/m^3$ for the second 24 hour period. These daily means equate to 17.6% and 17.1%, respectively, of the $50~\mu g/m^3$ value that is set by the National Environmental Standard.

Background levels of PM₁₀ in the region have been found to be typically around $11\mu g/m^3$.

Nitrogen oxides (NOx)

From 2014 onwards, the Council has implemented a coordinated region-wide compliance monitoring programme to measure NOx. The programme involves deploying all measuring devices at 24 NOx monitoring sites (including two sites in the vicinity of the Kaimiro production station) on the same day, with retrieval three weeks later. This approach assists the Council in further evaluating the effects of local and regional emission sources and ambient air quality in the region.

The complete report covering region-wide NOx monitoring is attached in the Appendix to this memorandum.

The consents covering air discharges from the Kaimiro production station have specific limits related to particular gases. Special condition 14 of consent 4048-3 set a limit on the nitrogen dioxide concentration at or beyond the production station's boundary. The limit is expressed as $100~\mu g/m^3$ for a 24 hour average or $200~\mu g/m^3$ for a one hour average exposure.

NOx passive adsorption discs were place at two locations in the vicinity of the Kaimiro production station on one occasion during the year under review. The discs were left in place for a period of 21 days.

The calculated 1-hour and 24-hour theoretical maximum NOx concentrations found at the Kaimiro production station during the year under review equates to $8.94\mu g/m^3$ and 4.73 $\mu g/m^3$ respectively. The results show that the ambient ground level concentration of NO_x is well below the limits set out by consent 4048-3.

Memorandum

To Fiza Hafiz, Scientific Officer – State of the Environment

Job Managers - Callum MacKenzie, Emily Roberts, James Kitto

From Brian Cheyne, Scientific Officer – Air Quality

 File
 Frodo # 1718841

 Date
 22 July 2016

Monitoring of nitrogen oxides (NOx) levels in Taranaki near the NOx emitting sites, year 2015-2016

From 2014 onwards, the Taranaki Regional Council (TRC) has implemented a coordinated region-wide monitoring programme to measure NOx, not only at individual compliance monitoring sites near industries that emit NOx, but simultaneously at the urban sites (the Council regional state of the environment programme) to determine exposure levels for the general population. The programme involves deploying all measuring devices on the same day, with retrieval three weeks later. This approach will assist the Council to further evaluate the effects of local and regional emission sources and ambient air quality in the region.

Nitrogen oxides

Nitrogen oxides (NOx), a mixture of nitrous oxide (N2O), nitric oxide (NO) and nitrogen dioxide (NO2), are produced from natural sources, motor vehicles and other fuel combustion processes. Indoor domestic appliances (gas stoves, gas or wood heaters) can also be significant sources of nitrogen oxides, particularly in areas that are poorly ventilated. NO and NO2 are of interest because of potential effects on human health.

Nitric oxide is colourless and odourless and is oxidised in the atmosphere to form nitrogen dioxide. Nitrogen dioxide is an odorous, brown, acidic, highly corrosive gas that can affect our health and environment. Nitrogen oxides are critical components of photochemical smog – nitrogen dioxide produces the brown colour of the smog.

Environmental and health effects of nitrogen oxides

Nitrogen dioxide is harmful to vegetation, can fade and discolour fabrics, reduce visibility, and react with surfaces and furnishings. Vegetation exposure to high levels of nitrogen dioxide can be identified by damage to foliage, decreased growth or reduced crop yield.

Nitric oxide does not significantly affect human health. On the other hand, elevated levels of nitrogen dioxide cause damage to the mechanisms that protect the human respiratory tract and can increase a person's susceptibility to, and the severity of, respiratory infections and asthma. Long-term exposure to high levels of nitrogen dioxide can cause chronic lung disease. It may also affect sensory perception, for example, by reducing a person's ability to smell an odour.

National environmental standards and guidelines

In 2004, national environmental standards (NES) for ambient (outdoor) air quality were introduced in New Zealand to provide a guaranteed level of protection for the health of New Zealanders. The national standard for nitrogen dioxide (NO2) is set out below.

In any 1-hour period, the average concentration of nitrogen dioxide in the air should not be more than $200 \,\mu\text{g/m}^3$.

Before the introduction of the national environmental standards, air quality was measured against the national air quality guidelines. The national guidelines were developed in 1994 and revised in 2002 following a comprehensive review of international and national research and remain relevant. The national guideline for nitrogen dioxide (NO2) is set out below.

In any 24-hour period, the average concentration of nitrogen dioxide in the air should not be more than $100 \,\mu\text{g/m}^3$.

Nitrogen dioxide limits are also set in the special conditions of the resource consents. The consents limits are the same as those imposed under the NES and MfE's guideline.

Measurement of nitrogen oxides

The Taranaki Regional Council has been monitoring nitrogen oxides (NOx) in the Taranaki region since 1993 using passive absorption discs. Research to date indicates that this is an accurate method, with benefits of simplicity of use and relatively low cost. To date more then 660 samplers of nitrogen oxides have been collected in Taranaki region. Discs are sent to EUROFINS ELS Ltd. Lower Hutt for analysis. Passive absorption discs are placed at the nominated sites. The gases diffuse into the discs and any target gases (nitrogen dioxide or others) are captured.

In the 2015-16 year, passive absorption discs were placed on one occasion at twenty four sites, staked about two metres off the ground for a period of 21 days, for the purpose of Compliance Monitoring.

Conversion of exposure result to standardised exposure time period

From the average concentration measured, it is possible to calculate a theoretical maximum daily or one hour concentrations that may have occurred during the exposure period. Council data on NOx is gathered over a time period other than exactly 24 hours or one hour. There are mathematical equations used by air quality scientists to predict the maximum concentrations over varying time periods. These are somewhat empirical, in that they take little account of local topography, micro-climates, diurnal variation, etc. Nevertheless, they are applied conservatively and have some recognition of validity.

One formula in general use is of the form:

$$C(t_2) = C(t_1) \times (\frac{t_1}{t_2})^p$$

where C(t) = the average concentration during the time interval t, and p = a factor lying between 0.17 and 0.20. When converting from longer time periods to shorter time periods, using p = 0.20 gives the most conservative estimate (i.e. the highest calculated result for time period t_2 given a measured concentration for time period t_1). Using the 'worst case' factor of p = 0.20, the monitoring data reported above has been converted to equivalent 'maximum' 1-hour and 'maximum'24-hour exposure levels.

Results

The location of the NOx monitoring sites are shown in Figure 1 and the details of the NOx results are presented in Table 1 and Figure 2.

 Table 1
 Actual (laboratory) and recalculated ambient NOx results, NES and MfE guideline.

	Survey at	Site code	NOx(µg/m³) Lab. results	NOx 1/hr (μg/m³) Theoretical max.	NOx 24/hr (µg/m³) Theoretical max.
	McKee PS	AIR007901	1.9	6.5	3.5
		AIR007902	8.1	27.8	14.8
	Turangi PS	AIR007922	3.8	13.1	6.9
		AIR007824	3.3	11.3	6.0
	Kaimiro PS	AIR007817	1.2	4.1	2.2
		AIR007818	4.0	13.8	7.3
_	Sidewinder PS	AIR007831	0.8	2.8	1.5
iica		AIR007832	0.8	2.8	1.5
Petrochemical	Maui PS	AIR008201	1.3	4.5	2.4
1 00.		AIR008214	2.4	8.3	4.4
	Kupe PS	AIR007827	2.1	7.2	3.8
		AIR007830	1.4	4.9	2.6
	Kapuni PS	AIR003410	5.9	20.3	10.7
		AIR003411	7.0	24.1	12.7
	Cheal PS	AIR007841	1.5	5.2	2.7
		AIR007842	2.0	6.9	3.6
	Waihapa PS	AIR007815	1.5	5.2	2.7
		AIR007816	2.6	8.9	4.7
	Ballance AUP	AIR003401	4.2	14.4	7.7
		AIR003404	6.9	23.8	12.6
	Fonterra	AIR002410	3.4	11.7	6.2
Dairy factory		AIR002711	4.8	16.5	8.7
Da		AIR002412	4.3	14.8	7.8
		AIR002413	4.1	14.1	7.5
Nation	al Environmental S	Standard (NES) and	MfE guideline	200 (NES)	100 (guideline)

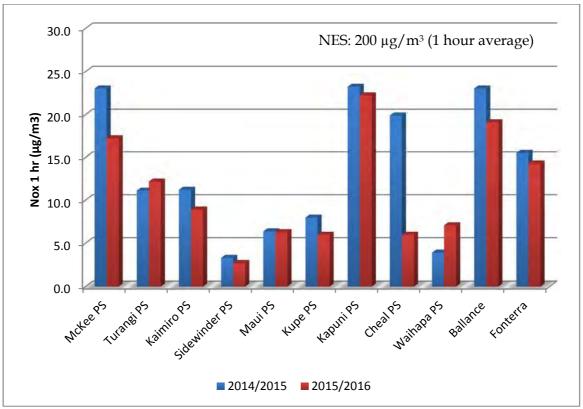


Figure 2 Average NOx levels at 11 surveyed locations throughout the region (year 2014-2016).

Discussion

The calculated 1-hour and 24-hour theoretical maximum concentrations (using a power law exponent of 0.2) ranged from 2.8 $\mu g/m^3$ to 27.8 $\mu g/m^3$ and 1.5 $\mu g/m^3$ to 14.8 $\mu g/m^3$ respectively. The highest results in 2015-16 monitoring year were obtained from the NOx emitting sites at four different locations:

- 1. Around the Fonterra's Whareroa co-generation plant.
- 2. In Kapuni heavy industrial area around the STOS production station and
- 3. Ballance ammonia/urea plant.
- 4. And from the sites at McKee production station and power generation plant.

All values were within the National Environmental Standards, Ministry for the Environment Ambient Air Quality Guidelines and the respective resource consents limits. This continues the pattern found in previous years.

5

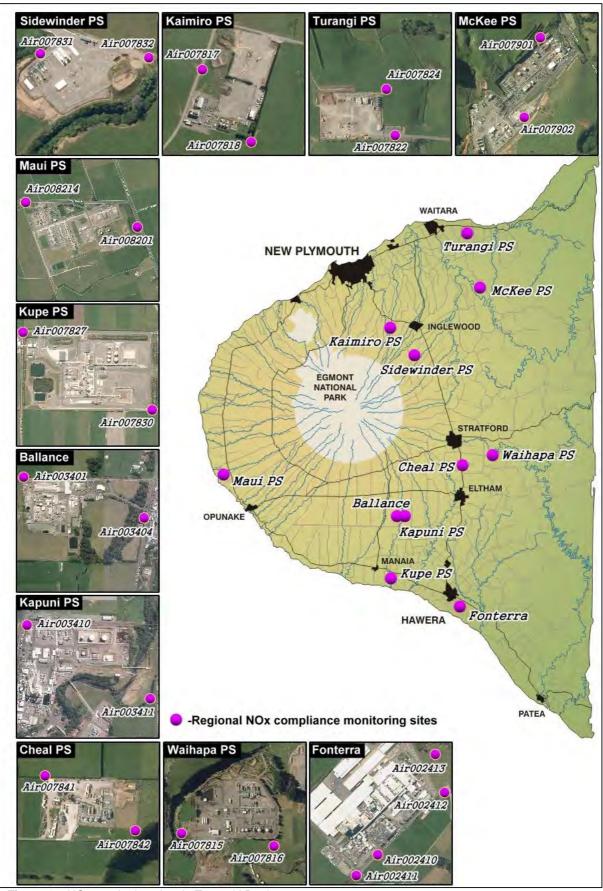


Figure 1 NOx monitoring sites in Taranaki Region, 2015-2016

Ministry for the Environment environmental performance indicator

Ministry for the Environment uses an environmental performance indicator to categorise air quality. These categories are set out in Table 2 and further details of the entire NOx results are set out in Table 3.

 Table 2
 Environmental Performance Indicator air quality categories

Measured value	Less than 10% of NES	10-33% of NES	33-66% of NES	66-100% of NES	More than 100% of NES
Category	excellent	good	acceptable	alert	action

 Table 3
 Categorisation of results (2015-16 monitoring year)

National Environmental Standard for NO2 = 200 μg/m³- 1 hour average.			
Category	Measured values		
Excellent	<10% of the NES, (0-20µg/m³)	20 (83%)	
Good	10-33% of the NES, (20-66µg/m³)	4 (17 %)	
Acceptable	33-66% of the NES, (66-132 μg/m³)	0 (0%)	
Alert	66-100% of the NES, (132-200 μg/m³)	0 (0%)	
Total number of samples		24 (100%)	

Conclusion

The monitoring showed that 83% of the 1-hour average results fell into Ministry's 'excellent' categories and 17% of the results lay within Ministry's 'good' category. No results ever entered the 'acceptable' or 'alert' categories, i.e., no results ever exceeded the National Environmental Standard of $200\mu g/m^3$.

These results, and all regional monitoring to date, have shown that Taranaki has very clean air, and on a regional basis there are no significant pressures upon the quality of the air resource.