

**BEFORE THE ENVIRONMENT COURT
I MUA I TE KOOTI TAIAO O AOTEAROA**

In the matter of the Resource Management Act and of appeals under clause 14 of
the First Schedule of the Act

Between

Transpower New Zealand Limited (ENV-2018-CHC-26)

Fonterra Co-Operative Group Limited (ENV-2018-CHC-27)

Horticulture New Zealand (ENV-2018-CHC-28)

Aratiatia Livestock Limited (ENV-2018-CHC-29)

Wilkins Farming Co (ENV-2018-CHC-30)

**Gore District Council, Southland District Council and Invercargill City Council (ENV-
2018-CHC-31)**

Dairy NZ Limited (ENV-2018-CHC-32)

H W Richardson Group Limited (ENV-2018-CHC-33)

Beef & Lamb New Zealand (ENV-2018-CHC-34 & 35) (continued overpage)

Appellants

Southland Regional Council

Respondent

**Second Memorandum of counsel on behalf of Z Energy Ltd, BP Oil NZ Ltd and Mobil
Oil New Zealand Ltd seeking leave to withdraw interest in Topic A of the Proposed
Southland Water and Land Plan**

04 April 2019

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Director-General of Conservation (ENV-2018-CHC-36)

Southland Fish & Game Council (ENV-2018-CHC-37)

Meridian Energy Limited (ENV-2018-CHC-39)

Alliance Group Limited (ENV-2018-CHC-39)

Federated Farmers of New Zealand (ENV-2018-CHC-40)

Heritage New Zealand Pouhere Taonga (ENV-2018-CHC-41)

Stoney Creek Station Limited (ENV-2018-CHC-42)

The Terrace Limited (ENV-2018-CHC-43)

Campbell's Block Limited (ENV-2018-CHC-44)

Robert Grant (ENV-2018-CHC-45)

Southwood Export Limited, Southland Plantation Forest Company of NZ, Southwood Export Limited (ENV-2018-CHC- 46)

Te Rūnanga o Ngāi Tahu, Hokonui Rūnaka, Waihopai Rūnaka, Te Rūnanga o Awarua & Te Rūnanga o Oraka Aparima (ENV- 2018-CHC-47)

Peter Chartres (ENV-2018-CHC-48)

Rayonier New Zealand Limited (ENV-2018-CHC-49)

Royal Forest and Bird Protection Society of NZ Inc (ENV-2018- CHC-50)

Appellants

May it please the Court

- 1 The Oil Companies (Z Energy Ltd, BP Oil NZ Ltd and Mobil Oil New Zealand Ltd) are s274 parties to a range of topics.
- 2 By memorandum dated 13 March 2019, the Oil Companies notified the Court and parties of withdrawal from Topic A matters for the Southland Water and Land Plan as follows:
 - ENV-2018-CHC-000037 Southland Fish and Game Council v SRC - Objectives 13, 13A, 13B
 - ENV-2018-CHC-000039 Alliance v SRC - Objectives 13, 13A, 13B. This removes the Oil Companies' interests in the Alliance appeal completely.
 - ENV-2018-CHC-000040 Federated Farmers v SRC - Objective 9B
 - ENV-2018-CHC-000041 Heritage NZ v SRC - Objectives 9 and 13
 - ENV-2018-CHC-000047 Ngai Tahu v SRC - Objectives 13, 13A, 13B, 9B
 - ENV-2018-CHC-000050 Forest and Bird v SRC - Objectives 13, 13A, 13B
- 3 The Oil Companies remain as interested parties in topics not identified above.
- 4 Despite withdrawal, the Oil Companies remain listed as interested parties for Topic A by the Council in its proposed hearing schedule and memorandum dated 2 April 2019.
- 5 For clarity, the Oil Companies therefore request that the Court:
 - Confirm that the Oil Companies are granted leave to withdraw from Topic A matters identified above on a no costs basis;
 - And are not required to enter an appearance at the Topic A hearing scheduled for weeks of 4 & 10 June 2019.

Dated this 4th day of April 2019



Rob Enright
Counsel for Z Energy Ltd, BP Oil NZ Ltd and Mobil Oil NZ Ltd