

RESOURCE MANAGEMENT ACT 1991

SUBMISSION ON A PUBLICLY NOTIFIED PROPOSAL FOR PLAN MADE UNDER CLAUSE 5 OF THE FIRST SCHEDULE OF THE ACT

MEMORANDUM TO THE HORIZONS REGIONAL COUNCIL HEARINGS COMMITTEE ON THE PROPOSED ONE PLAN TO ACCOMPANY SUBMISSION BY CROWN MINERALS, MINISTRY OF ECONOMIC DEVELOPMENT

Coastal hearing commencing Friday 12th September 2008

Introduction

1. Crown Minerals is a group within the Ministry of Economic Development. It is the government's business group that manages Crown-owned oil, gas, minerals and coal resources, collectively referred to as the Crown mineral estate¹.
2. The Crown Minerals Group is unable to attend the hearing and be heard but wishes to table written evidence in support of its original submission made 31 August 2007 on the Proposed One Plan ('the Proposal'). In these circumstances Crown Minerals Group reserves its position should Council's decision not reflect both our submission and this supporting evidence.

Submission concerning disturbance of the seabed by drilling

3. In respect of Chapter 17 "*Activities in the Coastal Marine Area (CMA)*", Crown Minerals' original submission sought:
 - "1. Add new Rule 17-32 (and/or renumber proposed rule 17-32 and consecutive rules) so that discharge of drilling muds, cuttings, and drilling fluids (these are inert materials) from offshore installations to the coastal marine area is expressly a *permitted* activity,"And:

¹ The Crown mineral estate comprises about half of New Zealand's in-ground coal, metallic and non-metallic minerals, industrial rocks and building stones, and all petroleum, gold, silver, and uranium.

"2. Change Rule 17-21 "*Minor disturbances, removal and deposition*" so that it is clear that "material" in relation to limb (a) "*exploration and drilling of the seabed...*" includes incidental discharge of drilling muds, cuttings, and drilling fluids from offshore installations to the coastal marine area, and to remove the 1km restriction seaward of mean high water spring."

4. It was submitted that both the proposed new Rule 17-32 and amended Rule 17-21 be subject to conditions, which included:

"Any drilling must not involve the use of explosives."

5. The Council planner's section 42A report has recommended the clause "Any drilling must not involve the use of explosives" be added as a condition/standard/term on Rule 17-21.

6. We seek our submission be amended in respect of the condition as follows:

"Any drilling must not involve the use of explosives, except for down-hole operations."

7. If the clause "Any drilling must not involve the use of explosives" is imposed as a standard without the qualifier "except for down-hole operations" then that in practice will negate the intended *permitted* status of Rule 17-21 for "*(a) exploration and drilling of the seabed...*".

8. The unqualified exclusion of explosives under Rule 17-21 should not extend to side-wall coring and other down-hole operations. The side-wall coring method involves deploying a wireline-conveyed side-wall coring tool which acquires a side-wall core from a geological formation. In-situ side-wall core analysis is performed on the core sample. The coring tool operates by shooting a small retractable hollow projectile into the rock formation. Side-wall coring is undertaken at hundreds of metres depth and adverse effects are negligible. Other down-hole operations that involve the use of small explosive charges and which have negligible adverse effects include the use of shaped charges for perforating casing, and also for the emergency recovery of down-hole equipment.

A handwritten signature in black ink, appearing to read 'Rob Robson'. The signature is fluid and cursive, with the first name 'Rob' being larger and more prominent than the last name 'Robson'.

Signature of person making submission or person authorised to sign on behalf of person making submission.

Rob Robson
Manager, Petroleum and Minerals Policy
Crown Minerals, Ministry of Economic Development
Date: 10 September 2008