

**BEFORE THE BOARD OF INQUIRY  
TAMARIND DEVELOPMENT DRILLING APPLICATIONS**

**EEZ100016**

**IN THE MATTER**

of the Exclusive Economic Zone and  
Continental Shelf (Environmental  
Effects) Act 2012

**AND**

**IN THE MATTER**

of a Board of Inquiry appointed under  
s52 of the Exclusive Economic Zone  
and Continental Shelf (Environmental  
Effects) Act 2012 to decide on  
Tamarind Taranaki Limited's marine  
consent and marine discharge consent  
applications

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**MEMORANDUM OF COUNSEL FOR THE APPLICANT REGARDING EXPERT  
CONFERENCING**

**DATED: 14 September 2018**

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**PRESENTED FOR FILING BY:**

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**MAY IT PLEASE THE BOARD:**

1. This memorandum is prepared on behalf of Tamarind Taranaki Limited (“Tamarind”).
2. The purpose of this memorandum is to request that an additional person attend expert conferencing scheduled for this matter. Specifically, Tamarind requests that Dr Alison Lane also attend the expert conference between Dr Brian King and Mr Justin Rodgers (Session 1: Oil Spill Modelling) scheduled for Tuesday 18 September 2018.
3. The Protocol for Expert Witness Conferences, Appendix 3 of the Environment Court Practice Note 2014, states that it may be appropriate to engage a person to take notes of the discussions and their outcome, and to assist in drafting the Joint Witness Statement and that such a person needs sufficient familiarity with the issues to understand what should and should not be recorded.
4. Tamarind respectfully requests that Dr Lane attend the above expert conference as a note taker and to assist in drafting the Joint Witness Statement. Dr Lane assisted Tamarind to draft the marine consent and marine discharge consent applications and the impact assessment and she has a comprehensive knowledge of the proposal and familiarity with the issues to understand what should and should not be recorded. Further, in the event any queries arise regarding the proposal, Dr Lane will be able to clarify these for Dr King and Mr Rodgers and help ensure there are no outstanding points of clarification at the conclusion of the conference. Dr Lane would not take part in any technical discussion between Dr King and Mr Rodgers.
5. If the Board requires any further information in relation to this request, please advise and/or should the Board wish to discuss this request further, Tamarind is available for a tele-conference.

**Dated** 14 September 2018

A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by a cursive 'L' and a long horizontal stroke extending to the right.

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**LP Wallace / RE Eaton**

**Counsel for Tamarind Taranaki Limited**