

# Application Form

## Marine discharge consent

Application for a marine discharge consent to undertake a notified or non-notified activity.

Under section 38 of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012.

Send to the Environmental Protection Authority:

- By email ([eez.info@epa.govt.nz](mailto:eez.info@epa.govt.nz))
- By post (Private Bag 63002, Wellington 6140)
- In person (Level 10, 215 Lambton Quay, Wellington)



Environmental  
Protection Authority  
Te Mana Rauhi Taiao

New Zealand Government

## Completing this application form

This application form should be used if you intend to apply for a marine discharge consent under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (the EEZ Act).

All notified and non-notified discretionary activities requiring a marine discharge consent are described in the Exclusive Economic Zone and Continental Shelf (Environmental Effects - Discharge and Dumping) Regulations 2015 (the D&D Regulations).

[View the D&D Regulations](#)

The information requirements for making an application are described in sections 38 and 39 of the EEZ Act and regulation 35 of the D&D Regulations.

Your application must:

- a) Be made in the prescribed form, and
- b) Fully describe the proposal, and
- c) Include an impact assessment prepared in accordance with section 39 and any regulations (including regulation 35 of the D&D Regulations).

If these requirements of the EEZ Act are not met, the EPA may return your application as incomplete or request further information from you to complete your application. You may attach additional information to support your application.

We recommend that you discuss these information requirements with EPA staff before lodging the application. Contact details are: 0800 208 338 (from within New Zealand) and +64 04 916 2426 (from overseas), or you can email the EPA at [eez.info@epa.govt.nz](mailto:eez.info@epa.govt.nz).

Please send the EPA an electronic copy of your application. Please separate large documents into smaller files less than 30 MB.

All documents lodged with this application, or that are referred to in the application, must be indexed in Section 7: Attachments.

Your personal and company information will be held by the EPA and used in relation to this application. You have the right to access and correct personal information held by the EPA. All information held by the EPA is subject to the Official Information Act 1982. Your full business contact details may be publicly available through our website. Your personal contact details (phone number, address and email) will not be made publicly available.

## Section 1: Applicant Details

**Organisation name:** Beach Energy Resources NZ (Holdings) Limited

**Postal Address:** Private Bag 2022, New Plymouth, New Zealand

**Phone:** (06) 769 9800

**Email:** community@beachenergy.com.au

**Key contact name:** Mat Quinn

**Phone:** (06) 769 9800

**Email:** community@beachenergy.com.au

**Petroleum Mining Permit/License number (if applicable):**

PEP 38264 – Canterbury Basin

I understand that the EPA will recover all its actual and reasonable costs associated with processing this application.

25 March 2020



**Signed**

**Date**

## Section 2: Types of activities covered in this application

What type(s) of discharges are you applying for? Tick the box(es) that apply.

Non-notified activities		Notified discretionary activities	
<input type="checkbox"/>	Discharge of harmful substances described in regulation 4(a) and (b) from offshore processing drainage, displacement water, and production water from an existing structure.	<input type="checkbox"/>	Discharge of harmful substances described in regulation 4(a) and (b) from offshore processing drainage, displacement water and production water unless discharged from an existing structure or for the purpose of a test flow of an exploration well.
<input type="checkbox"/>	Discharge of harmful substances described in regulation 4(a) and (b) from production water for the purpose of a test flow of an exploration well.	<input type="checkbox"/>	Discharge of seawater used for operational purposes that is contaminated with oil from new floating production storage and offloading facilities and floating storage units that exceeds 15 parts per million, without dilution
<input type="checkbox"/>	Discharge of seawater used for operational purposes that is contaminated with oil from existing floating production storage and offloading facilities and floating storage units that exceeds 15 parts per million, without dilution.	<input type="checkbox"/>	Discharge of sediments by mineral operations other than petroleum operations.
<input type="checkbox"/>	Discharge of harmful substances described in regulation 4(a) from mining activities.		
<input type="checkbox"/>	Discharge of harmful substances contained in drilling fluids.		

Term	Definition
Existing structure	Structure placed prior to 31 October 2015*
New structure	Structure placed on or after 31 October 2015*

\*Section 2 of the D&D Regulations

Section 3: The proposal	
Provide a full description of your proposal	Page reference in application or EIA
<p>Beach Energy NZ (Holdings) Limited (Beach) is applying for a marine discharge consent under section 38 of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (<b>EEZ Act</b>). This application seeks authorisation to discharge harmful substances from hazardous and non-hazardous deck drains (offshore processing drainage) – commonly referred to as ‘deck drains’ – of a mobile offshore drilling unit(s) (<b>MODU</b>) that will be used to drill exploration and appraisal wells as part of Beach’s Canterbury Basin Exploration and Appraisal Drilling Programme (<b>Canterbury Basin EAD Programme</b>).</p> <p>There is a possibility that small (trace) amounts of harmful substances may be present on deck areas of the MODU(s) and these may be discharged into the sea from the deck drains – it is these discharges that are the subject of this application.</p> <p>Beach is proposing to drill one exploration well as part of the Canterbury Basin EAD Programme. Depending on the learnings and results from this well, Beach may pursue a wider work programme within Petroleum Exploration Permit (<b>PEP</b>) 38264 that could include up to 11 follow-up exploration or appraisal wells. Drilling is anticipated to commence in late 2020 and will be completed as part of one or more drilling campaigns, using either, or both, a semi-submersible MODU or a drill ship MODU.</p> <p>A full description of the proposal is outlined in <b>Section 3</b> of the impact assessment (<b>IA</b>)</p> <p>In addition to the marine discharge consent which is the subject of this application, Beach requires other approvals under the EEZ Act for its Canterbury Basin EAD Programme, including marine consent for activities restricted by section 20 and marine discharge consent for activities restricted by section 20B (other than discharges from deck drains). In addition, an Emergency Spill Response Plan is required to be submitted to (and approved by) the Environmental Protection Authority (EPA). The activities that are the subject of these additional approvals from the EPA are outside the scope of this application. Those activities and the assessment of all relevant issues and potential effects will be addressed through their respective applications to the EPA at a later date.</p> <p>For the avoidance of doubt, the discharge of harmful substances from the deck drains of the MODU(s) that will be used to drill exploration and appraisal wells for the Canterbury Basin EAD Programme is the only activity for which consent is being sought in this application. While other consents and approvals will be required by Beach for its Canterbury Basin EAD Programme, these will be applied for separately at a later date.</p>	<p><b>Section 3</b> of the attached application, on pages 33 to 48.</p>
<p><b>Provide an anticipated timeline for the proposal or outline timeframes to give effect to the proposal</b></p>	<p>The Canterbury Basin EAD Programme is anticipated to commence in late 2020 and will be completed as part of one or more drilling campaigns over the life of this marine discharge consent and the duration of PEP 38264. An expiry date of 7 November 2029 is proposed in the application to allow for a potential extension of the PEP (as discussed in <b>Section 8</b> of the IA).</p>
<p><b>Provide a map showing the location of the activity/activities, including New Zealand map grid reference coordinates</b></p>	

<p>The extent of PEP 38264 is provided within <b>Figure 2</b>, with the locations of the potential wells shown in <b>Figure 3</b> and <b>Figure 4</b>, within <b>Section 3</b> of the attached IA.</p>	<p><b>Section 3</b> of the attached application, on page 34 to 36.</p>
<p><b>Identify the information that addresses the decision-making matters set out in sections 59(2A) and 60 of the EEZ Act</b></p>	
<p>A full assessment of the proposal on the relevant sections of the EEZ Act is located within <b>Section 2.1</b> of the attached IA. In addition, <b>Table 2</b> and <b>Table 3</b> summarise how the requirements of sections 59 and 60 of the EEZ Act are met within the IA.</p>	<p><b>Section 2</b> of the attached application, on pages 26 to 32.</p> <p><b>Table 2</b> is found on pages 8 to 12.</p> <p><b>Table 3</b> is found on page 13.</p>

## Section 4: Impact assessment

Attach your impact assessment as Appendix 1 to this application. Your assessment needs to contain the information below and must comply with section 39 of the EEZ Act and regulation 35 of the D&D Regulations. Please include the page number(s) indicating where the information can be found within your assessment.

The impact assessment must contain the required information in:

- such detail as corresponds to the scale and significance of the effects that the activity may have on the environment and existing interests; and
- sufficient detail to enable the EPA and persons whose existing interests are or may be affected to understand the nature of the activity and its effects on the environment and existing interests.

	Page ref.
4.1 Describe the activity (or activities) for which consent is sought	<b>Section 3</b> – Activity Description Pages 33 to 48.
4.2 Describe the current state of the area where it is proposed that the activity will be undertaken and the environment surrounding the area	<b>Section 4</b> – Existing Environment Pages 49 to 94.
4.3 Identify persons whose existing interests are likely to be adversely affected by the activity	<b>Section 5</b> – Existing Interests and Engagement Pages 95 to 105.
4.4 Identify the effects of the activity on the environment and existing interests (including cumulative effects and effects that may occur in New Zealand or in the sea above or beyond the continental shelf beyond the outer limits of the exclusive economic zone)	<b>Section 7</b> – Impact Assessment – Potential Environmental Effects Pages 107 to 124.
4.5 Identify the effects of the activity on the biological diversity and integrity of marine species, ecosystems, and processes	<b>Section 7.3.2</b> – Water Quality <b>Section 7.3.3</b> – Sediment Quality <b>Section 7.3.4</b> – Biological Environment Pages 111 to 116.
4.6 Identify the effects of the activity on rare and vulnerable ecosystems and habitats of threatened species	<b>Section 7.3.2</b> – Water Quality <b>Section 7.3.3</b> – Sediment Quality <b>Section 7.3.4</b> – Biological Environment Pages 111 to 116.

<p><b>4.7</b> Describe any consultation undertaken with persons described above in <b>4.3</b> and specify those persons who have given written approval to the activity</p>	<p><b>Section 5 – Existing Interests and Engagement</b> Pages 95 to 105.</p>
<p><b>4.8</b> Include copies of any written approvals to the activity</p>	<p>No persons have provided written approvals at the time of lodgement of this marine discharge consent application.</p>
<p><b>4.9</b> Specify any possible alternative locations for, or methods for undertaking, the activity that may avoid, remedy, or mitigate any adverse effects</p>	<p><b>Section 7.5 – Assessment of Alternatives</b> Page 124.</p>
<p><b>4.10</b> Specify the measures that could be taken to avoid, remedy, or mitigate the adverse effects identified (including measures that the applicant intends to take).</p>	<p><b>Section 3.2.2 – Typical MODU Deck Drain Layout and Treatment System</b> <b>Section 3.3 – Systems and Procedures</b> Pages 37 to 42.</p>
<p><b>4.11</b> Describe the effects of the activity on human health</p>	<p><b>Section 7.3.8 –Human Health</b> Pages 122.</p>

## Section 5: Description of discharges

Information is required for each substance in the application that is ecotoxic to aquatic organisms according to the Hazardous Substances (Minimum Degrees of Hazard) Regulations 2001. In order to assess the ecotoxicity of each product, we require the following information for each of the harmful substances you propose to discharge:

Product Name	<p>Beach has not yet contracted a MODU and does not have a precise list of harmful substances that may be used during the Canterbury Basin EAD Programme, and consequently does not have a precise list of the harmful substances which may be discharged from the deck drains.</p> <p>Following the contracting of a MODU, Beach will submit an ESRP which will contain information on all harmful substances that will be stored on the MODU(s), including their Safety Data Sheets, and information on the prevention, mitigation, and control of any spills.</p> <p>Notwithstanding the above uncertainties, the IA has been based on the best available information. In addition, these uncertainties do not mean that the assessments and conclusions within this application are uncertain or inadequate. In fact, the approach taken in the preparation of this application has enabled the appropriate assessments of potential effects on the environment and existing interests to be made so that the requirement to favour caution does not arise. This approach has involved using worst-case scenario assumptions to account for any possible uncertainty.</p> <p>An assessment of potential harmful substances can be found in <b>Section 3</b> of the attached application.</p>
HSNO Approval Code	
SDS provided (<5 years old)	
All hazard classifications for product	
CAS # of each component and maximum concentration (in g/L and %) of each component	
Specific gravity kg/m <sup>3</sup> of product (and of each component if possible)	
Product state (e.g., solid/liquid). If a liquid mixture, state whether an emulsion; suspension; other	
Solubility in water (mg/L) of product and/or each component	
Use category (e.g., biocide, corrosion inhibitor)	
Maximum concentration at point of discharge (ppm or mg/L)	
Maximum volume discharged per event (L)	
Frequency of discharge (number per day, week, or month)	
Minimum interval between discharges	
Acute and chronic aquatic ecotoxicity endpoint(s) for product or each component. E.g., Median Lethal Concentration (LC <sub>50</sub> )/Median Effect Concentration (EC <sub>50</sub> ) or No Observed Effect Concentration (NOEC) values. Please provide supporting studies or evidence	
Sediment reworker ecotoxicity report (for 'sinkers') of product or of each component.	
Bioaccumulation and persistence data for each component. Please provide supporting studies or evidence	

## Section 6: Related applications, consents, permits and/or licences

Does your proposal require related applications for marine consent under the EEZ Act?

- No
  Yes, the consents required are listed below.

What other consents or permits/licences are required for the proposed activity/activities?

- None
  The required consents, permits and licences are listed below.

Activity	Type of consent required	Reference (if applicable)	Authorisation granted (Y/N)
A marine consent is required for activities restricted by section 20 of the EEZ Act relating to the proposed Canterbury Basin EAD Programme.	Marine consent	Still to be lodged	N
A marine discharge consent is required for activities restricted by section 20B of the EEZ Act relating to the proposed Canterbury Basin EAD Programme.	Marine discharge consent	Still to be lodged	N
The approval of an ESRP prior to operations beginning as required by regulation 24 of the D&D Regulations.	ESRP	Still to be lodged	N
Establishment of a 500 m Non-Interference Zone around the MODU under section 101B of the Crown Minerals Act 1991.	Non-interference zone	Still to be lodged	N
Approval of an Oil Spill Contingency Plan under Marine Protection Rules: Part 131, under the Maritime Transport Act 1994.	Oil Spill Contingency Plan and associated Well Control Contingency Plan	Still to be lodged	N
International Oil Pollution Prevention Certificate under Marine Protection Rules: Part 131, under the Maritime Transport Act 1994.	International Oil Pollution Prevention Certificate	MODU specific – not yet contracted	N
Certification from the Ministry for Primary Industries that the Craft Risk Management Standard – Biofouling on Vessels Arriving to New Zealand has been complied with prior to entering New Zealand waters.	Craft Risk Management Standard – Biofouling on Vessels Arriving to New Zealand	Still to be lodged	N
Certification from the Ministry for Primary Industries that the Import Health Standard: Ballast Water from All Countries has been complied with prior to entering New Zealand waters.	Import Health Standard: Ballast Water from All Countries	Still to be lodged	N

Approval of a Safety Case under the Health and Safety at Work Act 2015, and its associated Health and Safety at Work (Petroleum Exploration and Extraction) Regulations	Safety Case	Still to be lodged	N
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## Section 7: Attachments

List **all** documents submitted with the application.

Attachment number	Document name	Author	Document Version
01	Marine Discharge Consent Application – Discharge of Harmful Substances from Deck Drains	SLR Consulting NZ Limited	740.10106.00100-R01-v1.0 March 2020

### Further information

More detailed information is available on our website at [www.epa.govt.nz](http://www.epa.govt.nz) or by contacting us directly.

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