

7 March 2014

Stratford District Council
Attn: Allan Chesswas

PEPANZ Submission: Stratford District Plan Review - Managing Energy Resource Development and the Effects of Climate Change

Introduction

This document constitutes the Petroleum Exploration and Production Association of New Zealand's (PEPANZ) submission in respect of the *Stratford District Plan Review - Managing Energy Resource Development and the Effects of Climate Change – Discussion Document - December 2013* ("discussion document").

PEPANZ represents private sector companies holding petroleum exploration and mining permits, service companies and individuals working in the industry.

In the following table we provided comments on some sections of the discussion document. We appreciate the opportunity on some matters at this early stage and look forward to submitting on the specific proposals to be provided in the revised Stratford District Plan, when as signalled in the discussion document, it is notified for public submissions in the middle of this year.

We would be happy to answer any questions or discuss the contents of this brief submission.

Table of comments

| Page of the discussion document | Relevant text of the discussion document | PEPANZ Comments |
|---------------------------------|---|---|
| Page 18 | Underground pipelines for oil and gas to a gauge pressure of 2000 kilopascals are provided for as Permitted Activities throughout the district. | We note this provision but given that upstream industry pipelines are subject to comprehensive requirements under the <i>Health and Safety in Employment (Pipelines) Regulations 1999</i> for design, design verification and inspection it is unclear why a specific pressure limit is included in the district plan. |
| Page 50 | <p><i>B1.2.1.3.1 Matters to which Discretion is Reserved</i></p> <p><i>For the limited discretionary activities in Rule B1.2.1.3 above, a resource consent is required. In considering whether to grant such consents, the District Council will limit the exercise of its discretion to the following matters:</i></p> <p><i>(a) For Mineral Exploration, including Petroleum Exploration and for Production Testing and Interim Production</i></p> <p>....</p> <ul style="list-style-type: none"> • the use of a flaring combustion chamber | In relation to the use of a <u>flaring combustion chamber</u> . This is a very prescriptive condition targeted at reducing light impacts (even though we understand conditions are often met by flare pits) but would not provide specific circumstances or for new technology in the future. We note also that flare chambers can be noisy and that there may be a need of other flaring options (such as a flare pit) in for example emergency situations. Whilst flaring chambers may be a good option in some circumstances making them compulsory may be unnecessary in some circumstances to avoid the effects of concerns (light) and could create other issues. |
| Page 51 | <p><i>B2.1.13 Lighting and Glare</i></p> <p><i>(a) Rural Zone & Residential Zone:</i></p> <ul style="list-style-type: none"> • <i>Light emissions shall not exceed 10 Lux at any receiving site.</i> | The definition of a receiving site should be clarified, is this a dwelling? |
| Page 51 | <p><i>B2.5</i></p> <p><i>(d) Flaring:</i></p> <p>Any flaring associated with petroleum exploration or production shall be contained by a flaring combustion chamber.</p> | See comments above in relation to B1.2.1.3.1. |

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| Page 51 | <p><i>B2.10 Activities Involving Transportation of Good and/or Products</i> <i>(a) Rural Zone:</i></p> <ul style="list-style-type: none"> • Traffic movements shall not exceed 50 “Vehicle Equivalent Movements” per day in one 24 hour period, or an average of 30 per day over any 7 day period site, at any site. | We would be keen to engage on this topic but require further clarity on the definition of Vehicle Equivalent Movements? Applying this as currently drafted could be challenging given the inherent difficulties that can be associated with managing continuously rolling averages. |
| Page 52 | <i>B5.1 General Assessment Criteria</i> | It would aid clarity to explicitly link the “adverse effects” referred to here to those matters over which the Stratford District Council has control. |