

Your Reference: 2020-B-07359

Our Reference: 191149

13th January 2021

Sara Clarke
Manager, COVID-19 Fast-track Consenting
Ministry for the Environment

Electronically delivered to fasttrackconsenting@mfe.govt.nz

Dear Sara,

**RESPONSE TO FURTHER INFORMATION REQUEST FOR KAPUNI GREEN
HYDROGEN PROJECT**

In response to your further information request (the request) received via email on 08th December 2020, I can confirm the following information below which corresponds with the numbering used in your letter.

1. As discussed in the application and further information, the applicant has engaged with Te Korowai o Ngaruahine and have been directed by the iwi authority to engage with Ngāti Manuhakai and Ngāti Tu hapū directly. Through this engagement the applicant has developed cultural mitigation measures for the project which are anticipated to be agreed to by both hapū. It is the applicant's expectation that the resource consent application will outline the agreed cultural mitigation measures for the project including confirmation from both hapū and the iwi authority that a cultural impact assessment is not required in accordance with Schedule 6 Section 9(5)(b) of the COVID-19 Recovery (Fast-track Consenting) Act 2020.
2. The applicant does not anticipate any adverse effects on the high-pressure gas and liquid petroleum pipeline that the proposed hydrogen pipeline at the Ballance Kapuni site will be required to traverse. It is common for gas and liquid petroleum pipelines to intersect. The applicant has consulted with the owner/operator of the pipeline (Firstgas Group) and they have provided a letter of comfort confirming that there are no obvious legal or technical barriers that would prohibit the installation of the proposed hydrogen pipeline across the Firstgas Group pipeline provided due process is followed. A copy of this letter is attached.
3. Aside from the easement related to the aforementioned Firstgas Group pipeline at the Ballance Kapuni site, none of the easements on other land involved in the project would have any impact on the project proceeding due to those easements being significant distances away from the proposed turbines, power cable routes and associated infrastructure.

We trust that the above provides the necessary information for MfE to continue with their evaluation of the application. If you have any questions about any matters contained above please feel free to call me to discuss further.

Yours sincerely,



Cam Twigley
Director, Planning and Environment

(on behalf of Hiringa Energy Ltd and Ballance Agri-Nutrients Ltd)

Released under the provision of
the Official Information Act 1982

13 January 2021

Hiringa Energy
C/- Matt Luscombe
s 9(2)(a)

New Plymouth 4312

Dear Matt

RE: PROPOSED HYDROGEN PIPELINE INSTALLATION – PALMER ROAD.

Thank you for reaching out to Firstgas Group to discuss the proposed Hiringa/ Ballance project including the installation of a Hydrogen Pipeline at the Ballance Agri-Nutrients Ammonia- Urea Plant at Kapuni, Palmer Road. Specifically you have identified that the proposed hydrogen pipeline installation will need to cross an existing Firstgas pipeline and pipeline easement and you have requested confirmation that there are no legal or technical (engineering) barriers that would prohibit this proposed crossing of our network infrastructure.

In order for Firstgas to consent to any proposed third party utility installation over a Firstgas High Pressure Transmission Pipeline, our pipeline integrity engineers must first assess and approve the detailed design and proposed construction methodology of the utility installation. This assessment is a regulatory obligation, to ensure safety of people and pipeline integrity.

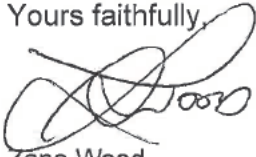
Assessments are managed through our internal Working Adjacent to Pipelines (WAPs) process. They are predominantly carried out by our pipeline integrity engineers and may result in determinations being made in relation to separation distances, works methodology and whether stand over will be required. On completion of the assessment, consent is issued (via a Pipeline Easement Permit). Pipeline Easement Permits may be subject to conditions resulting from the determinations made by our integrity engineers. The WAPs process must be undertaken in order for a consent to be issued, prior to commencement of works.

Based on the information you have provided to date, I am able to confirm that there are no obvious legal and technical barriers that would prohibit the installation of the proposed hydrogen pipeline across Firstgas' asset, provided that the WAPs process is followed, a consent is issued, and Hirangi complies with the conditions of any such consent.

As you will be aware, our registered easement provides that we cannot unreasonably withhold our consent, so we trust this provides you with sufficient comfort that reasonableness is applied during our WAPs process.

If you have any questions regarding this letter, please feel free to contact me to discuss further.

Yours faithfully,



Zane Wood
Senior Land and Planning Advisor
s 9(2)(a)

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the Official Information Act 1982