

Further Submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

Clause 8 of Schedule 1, Resource Management Act 1991

Please send your submission to be received by 4:00 pm on 31 July 2018

Further Submission Number
Office use only

FS24

TO: The Chief Executive
Bay of Plenty of Regional Council
PO Box 364
Whakatāne 3158

EMAIL:

air@boprc.govt.nz

Name: FIRST GAS LTD.
[Full name of the person or organisation making the submission]:

This is a further submission in support of or opposition to a submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

1. I ~~do~~ **do not** wish to be heard in support of my further submission.
[Delete as required]
2. If others make a similar submission I **would or would not** be prepared to consider presenting a joint case with them at any hearing.
[Delete as required]
3. I am:-
[Please tick one]
 a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category.)
 a person who has an interest in the proposal that is greater than the interest the general public has. (Specify upon what grounds you come within this category.)

On the following grounds:

Owner and operator of the gas transmission network.

Signature [of person making submission or person authorised to sign on behalf of person or organisation making submission.
A signature is not required if you make your submission by electronic means]



Address for Service [Provide full postal details]:

c/- Beca Amec Ltd, 70 Box 264 Taranaki Mail Centre

Telephone:

Daytime: 027463031.

After Hours:

— 4340, New Plymouth.

Email:

hymel.edwards@beca.com.

Contact person [Name & Designation if applicable]:

Hymel Edwards.

Note: A copy of your submission must be served on the original submitter within 5 working days after making this further submission

Further Submission Points

Submission No.	Submitter Name	Section Reference	Support/Oppose	Reasons
66-9	First Gas Limited	New Rule	Support in principle, amendment sought.	<p>First Gas supports the submission it lodged in respect of the new rule for flaring, but in light of further consideration of the activity and its visual effects, seeks that permitted activity condition (b) be deleted to not restrict the average maximum gross heat output from the combustion process.</p> <p>The removal of this permitted activity conditions will allow flaring to be undertaken in the shortest possible time, thereby reducing effects of the activity which in any case will be managed by the other permitted activity conditions attached to the rule (as well as industry standards).</p> <p>For example, on average, flaring at 50 MW (depending on bore and length of pipe to de-pressure) would result in approximately 4.5 days flaring (daylight hours) while at 10 MW, this would result in approximately 24 days (day light hours).</p> <p>Not restricting the MW heat output will allow the flaring to be undertaken in the most efficient possible time. Adherence to industry standards will also safely manage the flaring activity over and above any requirements of the RMA.</p> <p>For the reasons outlined above.</p>
66-10	First Gas Limited	Amended Rule – AQ R18 (in the event submission 66-9 is not accepted)	Support in principle, amendment sought.	