

Notice of Requirement: Gas Transmission Network (First Gas Limited)

Central Hawkes Bay District

Prepared for Firstgas Limited
Prepared by Beca Limited

24 May 2021



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Revision History

Revision N°	Prepared By	Description	Date
v.01	David Forrest	Draft for internal review	15/11/2019
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Document Acceptance

Action	Name	Signed	Date
Prepared by	David Forrest		24/5/2021
Reviewed by	Hywel Edwards		24/5/2021
Approved by	Graeme Roberts		24/5/2021
on behalf of	Beca Limited		

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1 Firstgas Limited

Firstgas Ltd (**Firstgas**) owns and operates approximately 2500km of high-pressure natural Gas Transmission Pipelines and associated infrastructure throughout the North Island, collectively known as the Gas Transmission Network. Firstgas' Gas Transmission Network delivers gas from production stations in Taranaki through to various towns and locations throughout the North Island.

Firstgas is a Requiring Authority under Section 167 of the Resource Management Act 1991 (**RMA**), and gives Notice of a Requirement (**NoR**) under Section 168 of the RMA for a designation in respect of the land that forms the Gas Transmission Network within the Central Hawkes Bay District for the purposes of operating, maintaining and protecting the existing Network.

2 Description of the Work and Sites

2.1 Description of the Work

The nature of the work sought to be authorised by this NoR is for the '*ongoing operation and maintenance of the Gas Transmission Network within the Central Hawkes Bay District, inclusive of above-ground incidental equipment*'. The work is required for the purpose of delivering a safe, effective and efficient Gas Transmission Network.

Land use related activities required to access, operate and maintain the Gas Transmission Network typically include (but are not limited to) those identified in the table below:

Primary activity	Secondary activities
Small scale utility structures and buildings	<ul style="list-style-type: none"> • Earthworks • Vegetation clearance • Construction related activity and noise • Operational noise
Maintenance (including repair and / or replacement) of the Gas Transmission Network	<ul style="list-style-type: none"> • Earthworks to access and reinstate land, including near / adjacent to waterbodies • Vegetation clearance • Construction related activity and noise
Gas flaring and venting	<ul style="list-style-type: none"> • Temporary odour for gas detection purposes • Temporary noise during emission of gas • Construction related activity and noise • Temporary visible/light effect (flame)
Maintaining and enabling access	<ul style="list-style-type: none"> • Earthworks • Vegetation clearance

2.1.1 Nature of Proposed Restrictions on Other Parties

The restrictions that would apply are only on those activities that are likely to affect the operation, maintenance, integrity, condition and/or function the Gas Transmission Network that may prevent Firstgas from delivering a safe, effective and efficient network.

The restrictions proposed under the designation are:

That no person may, within the designated area, undertake the following activities without the express written approval of Firstgas:

- *Installation of Services*
- *Roading*
- *Fencing*
- *Excavation and filling*
- *Driveways and carparks*
- *Structures*

2.1.2 Planting Conditions on Firstgas Approvals of Third-Party Works within the Designation

The following condition will apply in relation to Firstgas' approval of third party works within the designation:

1. *Where applicable, the process implemented for providing Firstgas approval shall incorporate, or be incorporated into, the process for granting easement access to the gas network such that a single process for both requiring authority approvals and gas easement approvals is implemented unless otherwise requested by the party seeking approval.*

2.1.3 Conditions on Firstgas works

The following conditions will apply in relation to Firstgas works within the designation:

1. *Firstgas shall be exempt from providing an Outline Plan of Works for ongoing maintenance works (including the repair and replacement of existing assets) enabled by this designation.*
2. *Accidental Discovery Protocol condition*

Advice Note:

1. *This designation does not override any prior (primary) designations that may already be in place. Firstgas must obtain approval from any requiring authority holding a prior designation, in accordance with the provisions and requirements of that designation, for works/activities undertaken within the designated area. Some sections of the designation are or will be covered by other designations in addition to this designation, in which case multiple requiring authority approvals may be required for activities in these areas.*

2.2 Description of the Sites

For the purposes of this NoR, the Gas Transmission Network comprises:

- the land 6m either side of the Gas Transmission Pipeline (aligning with the 12m gas easement), and
- all associated above or below-ground fitting, appurtenance, fixture or equipment required for the conveyance of the product or material in the pipeline and/or for its safe, efficient or effective operation.

The sites comprising the Gas Transmission Network either contain a legal easement in favour of the Gas Transmission Pipeline, statutory rights pursuant to the provisions of the Petroleum Act 1937 or are owned by Firstgas. The extent of the designation is illustrated and confirmed in **Appendix A**, and co-ordinates will be provided by Firstgas in due course. There are three parcels of land over which Firstgas do not have a registered easement for the pipeline which are also set out in **Appendix A**. The first parcel, Closed Road Survey Office Plan 3638 was previously legal road and therefore an easement was not able to be registered

over this land at the time of pipeline installation. Lot 1 DP 16667 is subject to a gazette notice defining the route of the pipeline over this land parcel and Part Lot 1 DP 408068 is subject to a proclamation. It is uncertain as to why easements were not registered on these land parcels, however, Firstgas hold statutory rights under the saved provisions of the Petroleum Act 1937.

The designation starts at CHBDC's district boundary with Tararua District near State Highway 2 in the south, then heads north-east towards the outskirts of the settlement of Takapau. The designation then heads north over pastoral farmland and the Mareketu, Tukipo, Tukituki and Waipawa rivers and adjacent to Argyll Road until it reaches the boundary with Hastings District north-east of Tikokino.

Appendix B of this NoR outlines the Gas Transmission Network on the relevant Central Hawkes Bay District Planning Maps (Planning Maps 4, 5, 8, 11 & 12). The underlying zone for the designation within the District Plan is Rural.

For the avoidance of doubt, this NoR does not relate to any distribution related sites or assets, but does include those sites and assets required to convert the higher pressure gas (Gas Transmission Network) into lower pressure gas for distribution.

3 Reason for the Work

Firstgas' operating standards¹ require it to take all reasonably practicable steps to ensure the safety of the public, property and the environment. There is also a critical and fundamental requirement to safely, efficiently and effectively operate and maintain the Gas Transmission Network in order to continue the supply of gas to its customers who rely on that energy source for a wide variety of purposes.

Since purchasing the Gas Transmission Network in 2016, Firstgas has actively engaged in RMA statutory planning documents to both enable and protect the network. However, reliance on district plan provisions and the gas easement alone do not provide a sufficiently robust and complete framework. For this reason, Firstgas will seek to progressively secure designations coincident with the land easement as District Plans are rolled over and reviewed.

3.1 Operation and Maintenance

The Gas Transmission Network is regionally and nationally significant infrastructure in that it delivers significant benefits to people's social and economic well-being, as well as health and safety. In light of the benefits provided by the Gas Transmission Network, the safe, efficient and effective operation and maintenance of the network is a critical and fundamental requirement. The types of activities required to operate and maintain the Gas Transmission Network are set out in Section 2 of this NoR report.

Assessing the need for (and if required, thereafter preparing) resource consents on a case by case basis through District Plan processes is not considered to be the most effective and efficient method for Firstgas to operate and maintain the Gas Transmission Network. Neither is relying on the gas easement which is a land instrument as opposed to an RMA instrument.

¹ Health and Safety in Employment (Pipelines) Regulations 1999 and the operating code Standard AS2885 Pipelines – Gas and Liquid Petroleum (AS2885)

3.2 Protection from Others' Activities

Firstgas has an obligation to ensure the safety of the Gas Transmission Network and the people living and working near the network. Pipelines are required to meet the safety and operational requirements of the Health and Safety in Employment (Pipelines) Regulations 1999 and the operating code Standard AS2885 Pipelines – Gas and Liquid Petroleum (AS2885). Firstgas is required to ensure the protection and integrity of the Gas Transmission Network is maintained to ensure the safety of the public, property and the environment.

Third party interference is one of the main risks to the safety and integrity of the Gas Transmission Network. Traditionally, former owners and operators have relied on the gas easement to protect assets, infrastructure and activities. This is despite Firstgas having a robust network landowner management regime, which includes measures such as the provision of a safety handbook to the landowner each time change of property ownership occurs. Noting that the easement was established in the 1960s, the easement is not wholly fit for purpose in terms of delivering the outcomes require by Firstgas in a RMA context, nor fulfils its obligations to take all reasonably practicable steps to ensure the safety of the public, property and the environment.

For example, across the North Island, it is common for Firstgas to not be notified of the subdivision of land containing the Gas Transmission Network, or the establishment of activities in close proximity which introduce reverse sensitivity effects². This does not lead to good resource management outcomes in a reverse sensitivity context. Firstgas has therefore actively sought the inclusion of provisions in District Plans to provide the Gas Transmission Network with more protection. Firstgas seeks to manage third party interference through the requirement of a resource consent for a range of activities including the subdivision of land containing, or in close proximity to, the Gas Transmission Network and setbacks for certain activities considered sensitive to the operation of the network. The designation would sit alongside the Firstgas easement instruments having the effect of alerting District Plan users that Firstgas is an affected party when works are proposed near the network.

On their own, District Plan reverse sensitivity focused provisions do not provide a sufficiently robust framework for protecting the Gas Transmission Network.

4 Assessment of Alternatives

This NoR relates to a physically constructed and operated asset – the Gas Transmission Network. Therefore, there has been no assessment of alternative sites or routes. In summary:

- The work and designation are reasonably necessary for achieving Firstgas's objectives for which the designation is sought
- There is interest in the land over which the existing gas pipeline and other assets exist sufficient for undertaking the work and
- It is not likely that the operation and maintenance work on an existing asset will have a significant adverse effect on the environment.

As commented upon in Section 3 of this NoR, other methods to achieve Firstgas' objectives have been considered:

1. Reliance on the gas easement and

² Noting that the designation alone will not address reverse sensitivity effects of others' activities beyond the designation.

2. Reliance on district plan provisions.

However, these are not considered alternative methods *per se*, but rather complimentary to this NoR. These alternative methods do not, either on their own or in combination, provide Firstgas with the necessary enabling and / or protective framework required to fulfil its obligations and achieve its objectives.

5 Requiring Authority's Objectives

Firstgas' objectives are to:

- a) *enable the safe, efficient and effective operation and maintenance (including repair and replacement of assets and the ability to achieve access) of the Gas Transmission Network and*
- b) *provide statutory protection to safeguard the integrity of the Gas Transmission Network.*

Neither the status quo, or possible alternative methods, provide Firstgas with the ability to ensure the ongoing, safe, effective and efficient operation and maintenance of the Gas Transmission Network; or manage the use of the land to support the district's well-being.

The designation will provide clarity and certainty for Firstgas and the wider community on how the Gas Transmission Network will be operated and maintained, irrespective of potential future modifications to district plan rules or future designations by other parties. The designation will ensure the network across the district is managed and protected in a consistent manner.

Accordingly, the work and the designation are reasonably necessary to achieve Firstgas' objectives.

6 Resource Consents Needed for the Proposed Activity

No resource consents are required to operate and maintain the existing Gas Transmission Network.

Resource consents may be required from the regional council to maintain the Gas Transmission Network, but this will be dependent on the nature of the maintenance works. For example, activities that may necessitate the need for resource consent include:

- The discharge of contaminants to air from venting and / or flaring of gas to remove gas from the pipeline
- The undertaking of earthworks in or under a waterbody to access the pipeline and
- Dewatering of a trench containing the pipeline to provide access for maintenance, and resultant discharges to land of water.

As a responsible owner and operator, Firstgas assesses the need for any resource consents prior to any maintenance works being undertaken, and would obtain those consents as dictated to by the respective regional plan rules.

The land on which the Gas Transmission Network is located is not 'contaminated land' as a result of the presence of the Network. However, the Gas Transmission Network may traverse contaminated land (identified for other reasons), and an assessment of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health would be undertaken on a case by case basis.

7 Consultation

The designation applies to the existing Gas Transmission Network and will provide greater statutory backing to existing requirements. The designation will not authorise any works, structures or activities that are not already part of the existing environment created by existing legislation or the rules of the District Plan.

Firstgas has a good understanding of the potential effects on parties with an interest in the land subject to the designation. In addition, the adverse effects of the designation on the environment and other parties are insignificant.

Firstgas is requesting that this NoR be included in the proposed Central Hawkes Bay District Plan. Firstgas considers that there is no need to consult prior to public notification of the proposed District Plan.

8 Effects of the work on the Environment

An assessment of environmental effects is set out below. In summary, the designation will provide for the operation and maintenance (including repair and maintenance) of the Gas Transmission Network across the district and allow the works to be undertaken in a safe, effective and efficient manner in order to continue to supply gas to the district, and provide for people and the communities well-being and health and safety.

The adverse effects of the designation are acceptable, primarily for the reasons outlined below:

- The designation covers only the existing Gas Transmission Network and is generally covered by an existing gas easement or statutory rights in favour of Firstgas.
- The scope of the designation is limited to only the operation and maintenance (including repair and maintenance) of the existing Gas Transmission Network.
- The designation does not affect any existing designations over or under the Gas Transmission Network. A requiring authority with a preceding designation is able to undertake activities in accordance with their designation without needing the approval of the requiring authority for any subsequent designation.

While some operation and maintenance related work will temporarily effect some people (e.g. through temporary noise, temporary odour and / or other temporary effects) these effects will be for a temporary duration and managed safely, effectively and efficiently in accordance with Firstgas standard procedures.

8.1 Positive Effects

Firstgas' Gas Transmission Network delivers significant social and economic benefits to the people and communities of the district and wider North Island through providing a reticulated source of gas for domestic and commercial use. In this context, the Gas Transmission Network is of significance to the district, region and wider North Island. In addition to providing well-being benefits, gas also serves a basic health and safety need for people and communities, for example through the provision of heat to homes, businesses and other premises.

The designation will also provide benefits in the context of better managing reverse sensitivity effects, including through land use activities and subdivision. The presence of the designation will provide clarity on the process through which land owners can engage with Firstgas to ensure their proposed activities and / or subdivision is compatible with the Gas Transmission Network, and will not create a safety hazard.

8.2 Adverse Effects

8.2.1 Visual and landscape effects

The purpose of the designation is for the on-going operation and maintenance of the existing Gas Transmission Network. This being the case, the assets are already constructed and are operating meaning there will be no additional visual or landscape effects beyond those existing in the longer term.

Apart from above ground assets such as Delivery Stations where the high-pressure gas is converted to low-pressure for distribution, the existing gas transmission line is predominantly underground. Consequently, there are negligible visual and landscape effects beyond that already forming part of the existing environment.

At above ground stations, again the assets are existing and form part of the existing environment. These assets include stations, utility cabinets, security fencing and pipework.

Maintenance works may necessitate the removal of gas from the pipeline to enable works to be undertaken safely. This may involve the flaring of gas (i.e. the burning of gas as it exits the pipeline) which will create a visual effect (flame) for a duration required to empty the pipeline of gas to enable works. The flaring of gas is undertaken under strict operating procedures and is only a temporary effect.

Furthermore, the discharge of contaminants to air is an activity that is regulated by regional councils. For any proposed flaring of gas, Firstgas must therefore either comply with the permitted activity standards of the respective regional plan (air) or obtain a resource consent.

Overall, it is therefore considered that any actual or potential adverse visual and landscape effects on the surrounding environment as a result of this NoR will be both temporary and less than minor.

8.2.2 Noise effects

The purpose of the designation is for the on-going operation and maintenance of the existing Gas Transmission Network. This being the case, the assets are already constructed and are operating meaning there will be no additional noise effects beyond those existing in the longer term. The operation of the Gas Transmission Network generally complies with district plan noise standards.

Maintenance works may necessitate the removal of gas from the pipeline to enable works to be undertaken safely. This may involve the venting of gas (i.e. the release (not burning) of high-pressure gas from the pipeline) which will create a noise effect for a duration required to empty the pipeline of gas to enable works. The venting of gas is undertaken under strict operating procedures and is only a temporary effect.

Furthermore, the discharge of contaminants to air is an activity that is regulated by regional councils. For any proposed venting of gas, Firstgas must therefore either comply with the permitted activity standards of the respective regional plan (air) or obtain a resource consent.

Overall, while the release of high-pressure gas does create a noise effect, this effect is considered both temporary and less than minor.

8.2.3 Effects on Cultural Heritage and Archaeology

The purpose of the designation is for the on-going operation and maintenance of the existing Gas Transmission Network. This being the case, the lawfully established assets are already constructed and are operating meaning there will generally be no additional effects beyond those existing in the longer term. In order to construct the assets, the ground would have been disturbed.

Further, there are no known significant cultural sites (heritage buildings/objects, waahi tapu etc.) indicated on the District Planning Maps along the designation alignment.

Notwithstanding this, the remit of ‘maintenance’ for this NoR includes repair and replacement of the Gas Transmission Network. Any replacement works will need to be confined to the designated footprint to benefit from that process, otherwise the district plan rules will apply. In the event the gas transmission pipeline is replaced within the designated corridor, those works may disturb land not previously disturbed. Therefore, an Accidental Discovery Protocol is proposed as a condition of this NoR.

With the proposed Accidental Discovery Protocol condition in place, potential effects in respect of cultural heritage and archaeology can be mitigated, and are considered to be less than minor.

8.2.4 Construction Related Effects

During maintenance works, construction related effects will be generated temporarily. These effects will potentially include noise, vibration, dust, traffic and other effects.

Firstgas requires its specialist contractors to act in an environmentally and socially responsible manner. In most situations, the contractor is required to prepare and thereafter adhere to a construction management plan under which construction effects will be managed.

Due to the diverse and technical nature of maintenance works on the Gas Transmission Network, the various specific locations and the fact that numerous contractors may be utilised, an overarching construction management plan has not been prepared as part of this NoR. The construction management plan for a particular maintenance programme will be prepared on a case by case basis.

Construction related effects of operating and maintaining the Gas Transmission Pipeline will be both temporary and less than minor.

9 Conclusion

Firstgas is a Requiring Authority under Section 167 of the RMA and gives Notice of a Requirement (NoR) under Section 168 of the RMA for a designation in respect of the land that forms the Gas Transmission Network within the Central Hawkes Bay District. The purpose of the designation is to operate, maintain and protect the existing Gas Transmission Network.

Firstgas requests for CHBDC to include this NoR in the Proposed Central Hawkes Bay District Plan in accordance with Section 170(1) of the RMA.

In combination with other RMA processes, and in order to fulfil its operating obligations, this NoR provides the statutory basis for Firstgas to achieve its objectives which are to:

- a) *enable the safe, efficient and effective operation and maintenance (including repair and replacement of assets and the ability to achieve access) of the Gas Transmission Network and*
- b) *provide statutory protection to safeguard the integrity of the Gas Transmission Network.*

This NoR includes an assessment of alternative methods to achieve the objectives, and also an assessment of environmental effects which concludes that the effects of the designation on the environment and any person will be both temporary and less than minor.

It is considered the CHBDC should confirm this NoR without modification.

A

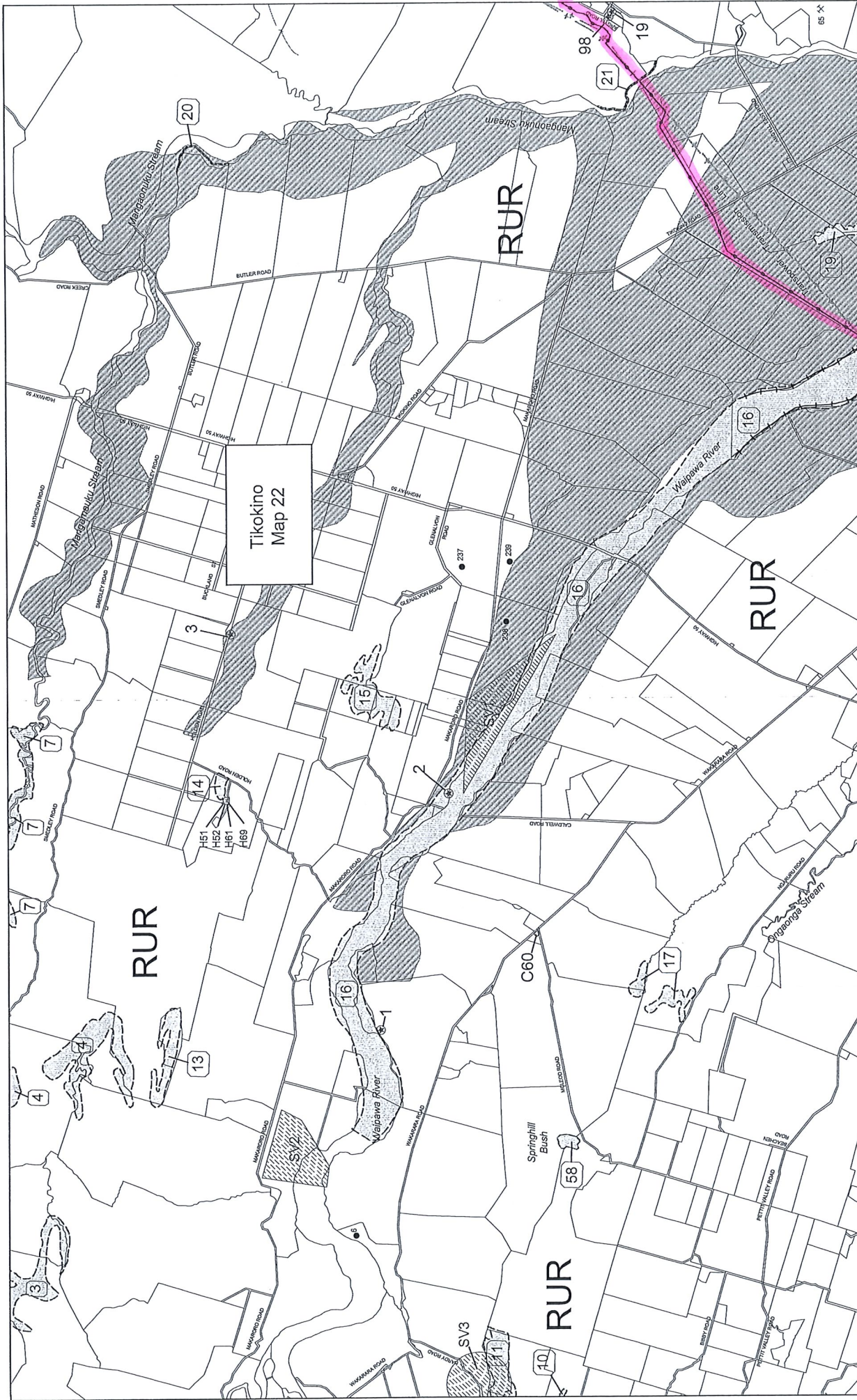
Appendix A – Gas Transmission Network and land holdings with no registered gas easement

Note: The full extent of the gas transmission network has been provided electronically. The table below outlines those parcels with no gas easement.

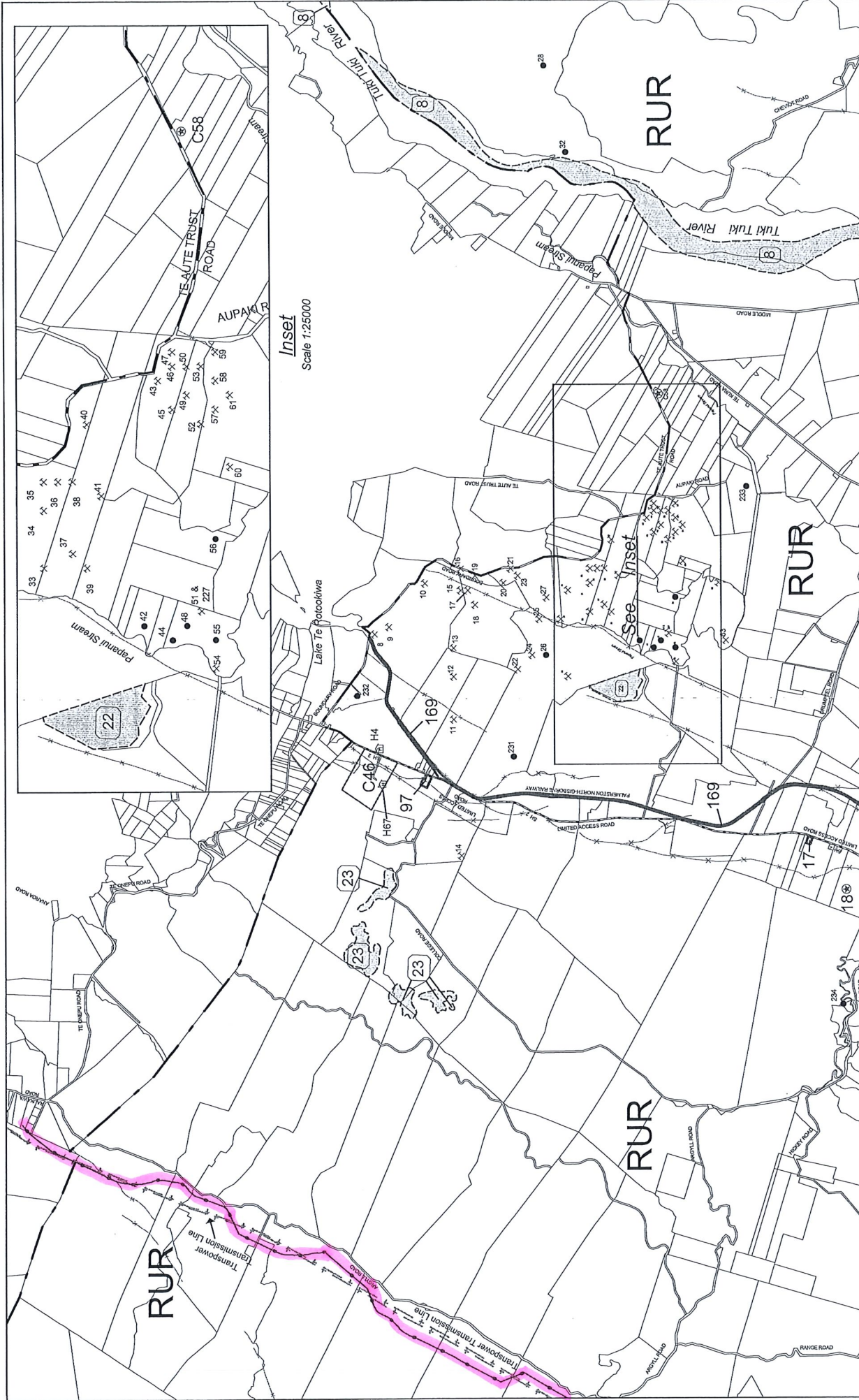
Legal Mechanism	Instrument number	Parcel legal description	Record of Title	Location	Description of mechanism
No Easement	-	Closed Road Survey Office Plan 3638	-	Wakarara Road, Waipawa	No title – legal road
Gazette	416126.1	Lot 1 DP 16667	HBJ2/693	Burnside Road, Takapau	Gazette Notice only on this property (defining middle line of Hawke's Bay pipeline). No registered easement
Proclamation	PROC 415442.1	Part Lot 1 DP 408068	428698	Nelsons Road, Takapau	Proclamation 415442.1 only on this land (defining middle line of the Hawke's Bay pipeline) - no registered easement

B

Appendix B – Relevant Central Hawkes Bay District Planning Maps

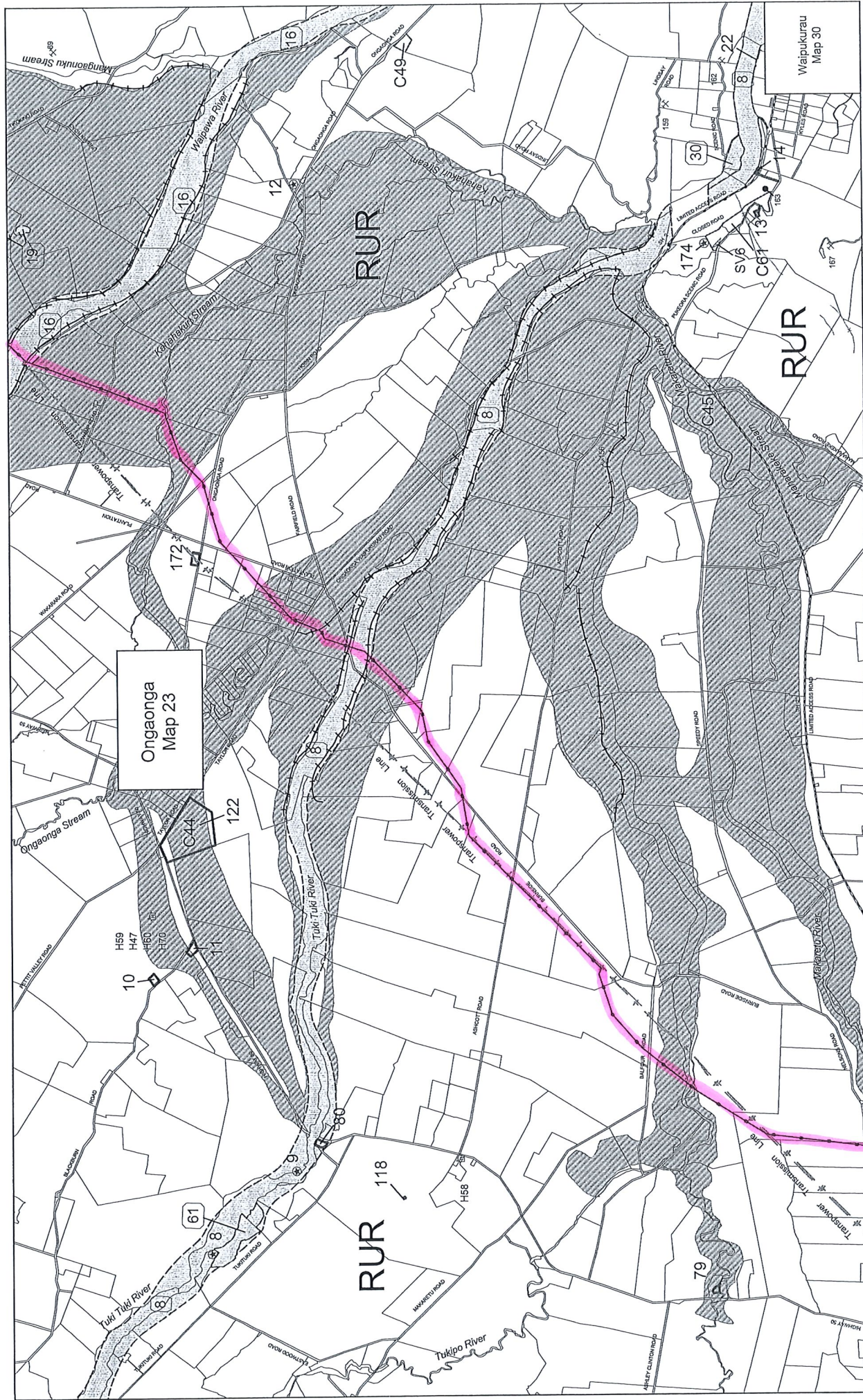


Zones BUS 1 Business 1 BUS 2 Business 2 RES Residential RUR Rural TSP Township Zone Boundary		Designations 54 Community Facilities C21 C15		Notations Areas of Significant Nature Conservation Value Floodable Area Areas of Outstanding Landscape Views Active Fault Coastal Margin Line Commercial Frontage District Boundary Kapuni Gas Pipeline		Location Diagram 1 2 3 4 5 8		Central Hawke's Bay District Council Scale 1:50000 0 0.5 1.0 1.5km N		Map No: 4 Date : May 2003	
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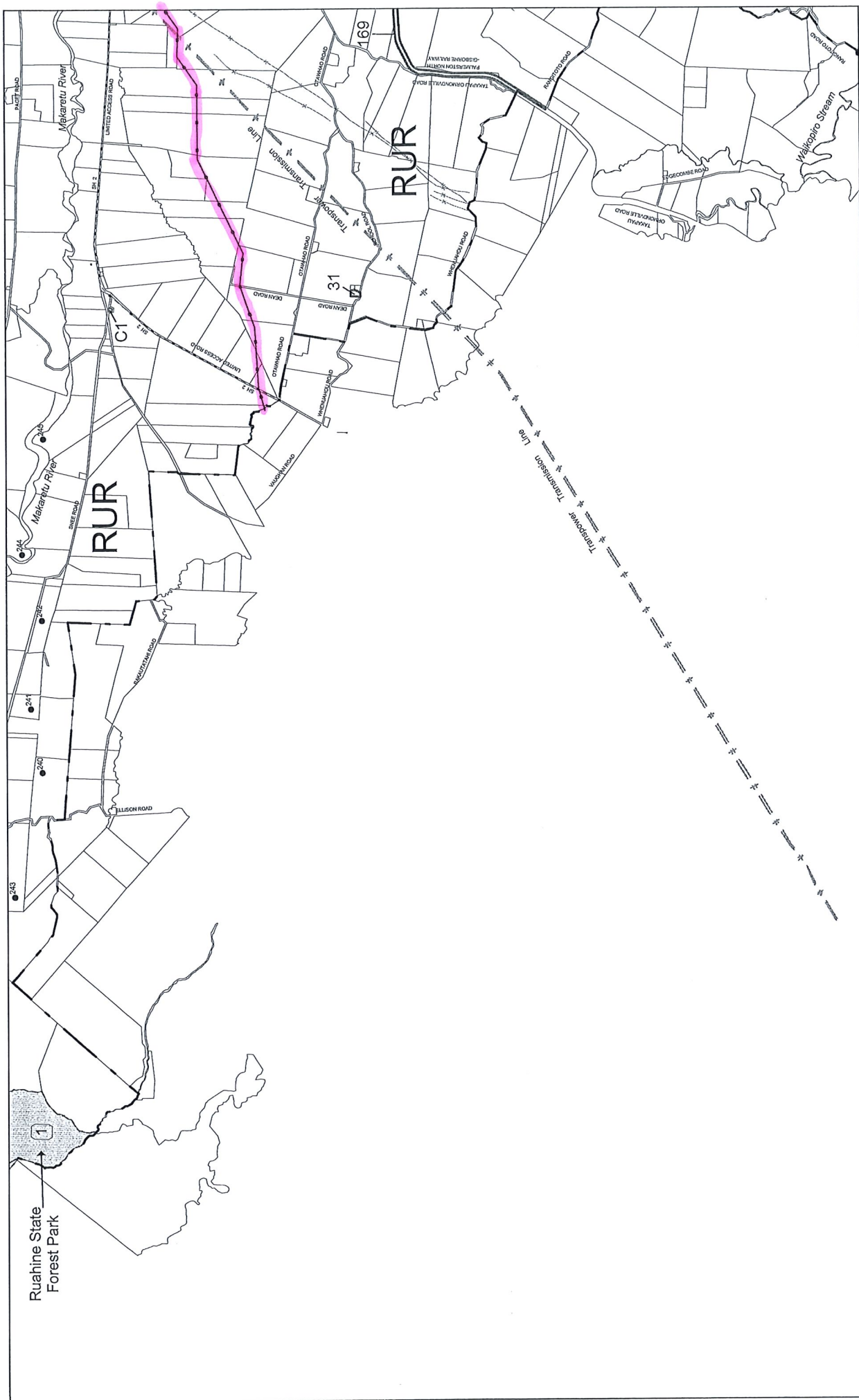
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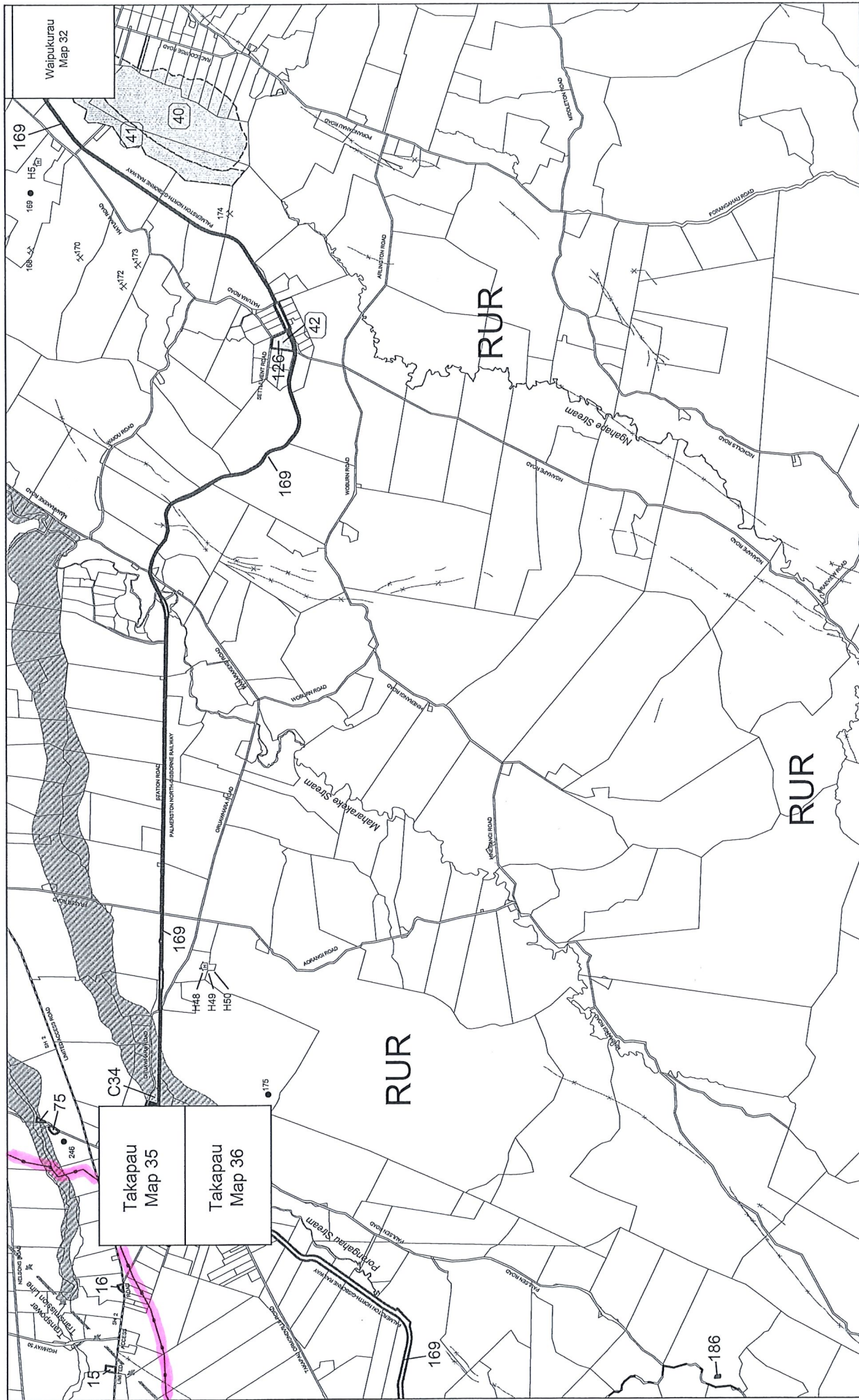


Ongaonga
Map 23

Zones BUS 1 BUS 2 RES RUR TSP		Designations 54 Community Facilities C21 C15		Notations Areas of Significant Value Floodable Area Areas of Outstanding Landscape Views Active Fault Coastal Margin Line Commercial Frontage District Boundary Kapuni Gas Pipeline Notable Tree		Location Diagram 4 8 12 7 9		Central Hawke's Bay District Council Scale 1:50000 0 0.5 1.0 1.5km		Map No: 8 Date : May 2003	
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Zones BUS 1 BUS 2 RES RUR TSP	Designations 54 Community Facilities C21 C15	Notations Active Fault Coastal Margin Line Commercial Frontage District Boundary Kapuni Gas Pipeline	Areas of Significant Value Nature Conservation Floodable Area Areas of Outstanding Landscape Views	Legend Limited Access Road Stopbank Sites of Cultural Significance to Tangata Whenua Archaeological Site Heritage Items Notable Tree	Central Hawke's Bay District Council	N Scale 1:50000 0 0.5 1.0 1.5km	7 11 12 15 Location Diagram	Map No: 11 Date : May 2003
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Zones BUS 1 BUS 2 RES RUR TSP Zone Boundary	Designations 54 Community Facilities C21 C15	Notations Areas of Significant Nature Conservation Value Floodable Area Areas of Outstanding Landscape Views Limited Access Road Slopbank Sites of Cultural Significance to Tangata Whenua Archaeological Site Heritage Items Notable Tree	8 11 12 13 15 16 Location Diagram	Central Hawke's Bay District Council	Map No: 12 Date : May 2003
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24 May 2021

Central Hawkes Bay District Council
Via Email
PO Box 127
Waipawa 4210

Attention: Helen O'Shaughnessy

Dear Helen

Form 18: Notice of Requirement by First Gas Limited: Proposed Central Hawkes Bay District Plan

Sections 168(2) and Clause 4 of First Schedule, Resource Management Act 1991

First Gas Ltd ('**Firstgas**') is a requiring authority under Section 167 RMA. It gives notice of a requirement ('**NoR**') for a designation for a public work for the safe, effective and efficient functioning and operation of the Gas Transmission Network within the Central Hawkes Bay District.

Firstgas requests that this NoR be included in the Proposed Central Hawkes Bay District Plan in accordance with Section 170 of the Resource Management Act 1991 ('**RMA**'), instead of complying with Section 169.

The accompanying report provides additional information to that contained within this Form 18.

The sites to which the requirement applies:

The site to which the requirement applies is:

- all those legal parcels, including road parcels, within the District over which the gas pipeline corridor holds a registered easement or statutory rights pursuant to the save provisions of the Petroleum Act 1937 is registered for the transmission of natural gas.
- those parcels within the District which are owned and operated by Firstgas and which contain gas transmission infrastructure.

These sites are confirmed in the accompanying NoR report.

The nature of the work is:

The work that this NoR relates is described in the accompanying NoR report. The nature of the work includes the operation and maintenance of the existing Gas Transmission Network owned and operated by Firstgas.

The nature of proposed conditions that would apply are:

It is proposed that the designation be subject to the designation conditions contained in the accompanying NoR report, as may be confirmed or modified in the determination of this NoR.

The effects that the work will have on the environment, and the way in which any adverse effects will be mitigated are:

An Assessment of Environmental Effects (AEE) is contained within the accompanying NoR report. It describes and evaluates the actual and potential adverse effects associated with the ongoing operation and maintenance of the Gas Transmission Network.

Alternative routes, sites, and methods considered:

This NoR relates to an existing asset therefore alternative routes and sites have not been considered. The following alternative methods have been considered in the accompanying NoR:

- Reliance on the existing gas easement and/or statutory provisions under the Petroleum Act 1937.
- Reliance on the District Plan.

The public work and designation are reasonably necessary for achieving the objectives of the requiring authority:

The accompanying NoR sets out why the public work and designation are reasonably necessary for achieving Firstgas' objectives, being to:

- a. Enable the safe, efficient and effective operation and maintenance (including repair and replacement of assets and the ability to achieve access) of the Gas Transmission Network, and
- b. Provide statutory protection to safeguard the integrity of the Gas Transmission Network.

The following resource consents are needed for the proposed activity and have (or have not) been applied for:

Regional resource consents will be required and applied for on an as needed basis for discharges to air, land and water and for works in waterways. The need for resource consents will be dependent on the location and nature of any operation and / or maintenance works.

Consultation with parties that are likely to be affected:

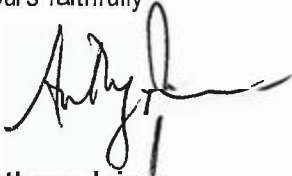
No direct consultation has occurred with any potentially affected parties. This is considered further in the accompanying NoR report.

Information required:

Firstgas attaches the following information required to be included in this NoR:

- Accompanying NoR report, inclusive of an AEE.
- Plans of the Gas Transmission Network within the Central Hawkes Bay District.

Yours faithfully



Anthony Joines
Manager - Land and Planning

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