

# Notice of Exemption

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In accordance with section 220 of the Health and Safety at Work Act 2015 (the Act), Todd Petroleum Mining Company Limited is exempted from compliance with regulation 17.22(1)(a) of the Health and Safety at Work (Hazardous Substances) Regulations 2017 (the HS Regulations) for each of their methanol and corrosion inhibitor tanks with the serial number listed in columns 3 and 4, Annex 1, that are located at each wellsite listed in columns 1 and 2 of Annex 1, subject to the following conditions.

Todd Petroleum Mining Company Limited must –

- (1) maintain, as a minimum, for each wellsite, the current separation distance between the methanol and corrosion inhibitor tanks as specified in column 6 of Annex 1; and
- (2) use only the corrosion inhibitors specified in column 5 of Annex 1; and
- (3) notwithstanding condition (2), Todd Energy may use another corrosion inhibitor at any wellsite specified in column 1 of Annex 1, provided that:
  - (i) the corrosion inhibitor used has the same or a lesser hazard classification than that specified in Annex 1 for any of the wellsites; and
  - (ii) the corrosion inhibitor must not contain 2-mercaptoethanol (CAS 60-24-2) at a concentration greater than 5%; and
- (4) other than methanol and the corrosion inhibitors provided for by column 5 of Annex 1 and condition (3), not hold any other hazardous substance in any type of package within the bund at any wellsite; and
- (5) no later than 30 September 2024, upgrade the bund at wellsite KA-13 to meet a capacity of 110% of the capacity of the largest tank in the bund;
- (6) within 21 days of completion of the works required by condition (5), notify WorkSafe in writing that the bund capacity for wellsite KA-13 has been upgraded; and
- (7) provide a copy of this exemption to any compliance certifier engaged to issue a stationary container system compliance certificate for the methanol or corrosion inhibitor tanks at each wellsite; and
- (8) hold a copy of this exemption at the Kapuni Production Station.

This exemption takes effect from the date specified in the *Gazette* notice required by section 221 of HSWA, which will be 4 December 2023 and expires on 4 December 2028 unless it is replaced sooner or revoked. This exemption is given the reference HS2205.

Signed at Wellington this 27 day of November 2023



Steve Haszard  
Chief Executive  
WorkSafe New Zealand

## ANNEX 1 – TANK LOCATION AND DESCRIPTION

Wellsite (Todd Energy descriptor)	Site address	Methanol tank	Corrosion inhibitor tank		Separation distance from methanol tank
		Tank no	Tank no	Corrosion inhibitor	
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
KA-01/07	350 Palmer Road, Kapuni	T-2191	T-0133 <sup>1</sup>	CORR10316A <sup>2</sup>	2.6 m
			T-0132 <sup>1</sup>	EC1447A <sup>3</sup>	5.4 m
KA-02	140 Palmer Road, Kapuni	T-0203	T-0202	EC1450A <sup>4</sup>	3.5 m
KA-04/14	598 Palmer Road, Kapuni	T-2429	T-0402	EC1450A	2.45 m
KA-05	992 Skeet Road, Kapuni	T-0509	T-0508	EC1447A	1.8 m
KA-06	849 Ahipaipa Road, Kapuni	T-2609	T-2608A	EC1450A	2.1 m
			2 drums	EC1170A	1.5 m
KA-08/18	939 Eltham Road, Kaponga	T-2866	T-2811	EC1450A	1.05 m
KA-13	1049 Skeet Road, Kapuni	T-21316	T-21315	EC1450A	1 m

1. Tank to be replaced. Tank number to be notified at the time of replacement.
2. Champion X CORR10316A, composition described by SDS version number: 1.4, issued 13/06/2021; HSNO classification 6.1D, 8.2C, 8.3A, 6.5B, 6.8B, 6.9B, 9.1B.
3. Champion X Enercept EC1447A, composition as described by SDS version number: 2.7, issued 22/06/2020; HSNO classification 6.1E, 6.3A, 8.3A, 6.5B, 6.8B, 6.9B, 9.1B, 9.3C.
4. Nalco EC1450A, composition as described by SDS version number: 1.5, issued 16/05/2018; HSNO classification 6.3B.