



## **GREYMOUTH PETROLEUM**

26 November 2025

**Hon. Simon Watts**  
**Minister for Energy**

**Hon. Shane Jones**  
**Minister for Resources**

Copy:

**Hon. Simon Court, MP**  
**ACT Spokesperson Energy and Resources**

Dear Ministers,

### **MBIE Proposals – ‘Improving the transparency of the gas market’**

Officials from MBIE invited Greymouth to make submissions in respect of a proposals paper titled ‘Improving the transparency of the gas market’.

Greymouth acknowledges these submissions are being presented after the proposed closing date for submissions. Nevertheless, Greymouth respectfully requests that what Greymouth has to say should not be considered.

As you will appreciate, much could be said about these MBIE proposals. Greymouth’s principal comment is the MBIE proposals involve vast bureaucratic overreach. Against that comment, Greymouth confines itself to making the following additional key points.

- The proposals for greatly expanded information to be provided to MBIE fail to adequately identify the problem the proposals are trying to solve and why, and how, the additional information will solve that problem.
- Vast amounts of high quality real time data are available now to all participants buying or selling gas. This data is available both from public sources and as privately published by firms such as Enerlytica. The data includes daily production volumes by field and the principal consumers of such gas production. As it is, this data is not always easy to analyse – more data won’t make analysis any easier.
- Instead of imposing substantial additional administrative burdens on gas producers, Greymouth submits that NZP&M and MBIE need to look at their own systems before imposing more demands. By way of example, it is a mystery to Greymouth why reserves data supplied by the industry is published by MBIE as much as three months or more after the data has been supplied.

Reserves data as supplied by producers cannot be amended or further interrogated by MBIE – it is what it is. We can see no reason why it could not be published within a month of receipt.

- MBIE has the resources to provide and publish much more comprehensive gas market data from the data it receives now. MBIE's focus should be on publishing the data it receives now.
- The New Zealand gas market is fast moving and dynamic. No one should expect to be in possession of perfect information. It is foolish to think by imposing elaborate and extensive new information requirements on producers, this will make any material difference to those having to make decisions concerning buying or selling gas. The basic problem is there is not enough gas production, and only limited amounts of new development and exploration drilling taking place. Forecasted drilling activity is just that - and will not necessarily result in new production. Having more information will not produce a single additional molecule of gas.
- Greymouth is particularly concerned about the proposed requirements for more pricing information. The price a supplier of gas will seek and what a buyer is willing to pay is affected by a wide range of different circumstances, including how much flexibility a producer can, or is willing to, provide or a buyer demands, the volume and terms upon which any such gas will be supplied and the use to which such gas will be put - e.g. manufacturing gas into methanol or fertilizer. Buyers and producers will each have their own particular requirements and those requirements will in and of themselves have an impact on price.

In summary, these proposed new data obligations are unnecessary and impose a material and unwelcome impact on gas producers. MBIE can and should do much better with the data it is already getting instead of attempting to shift the problem to producers.

Yours sincerely,



**Mark Dunphy**  
Chairman

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