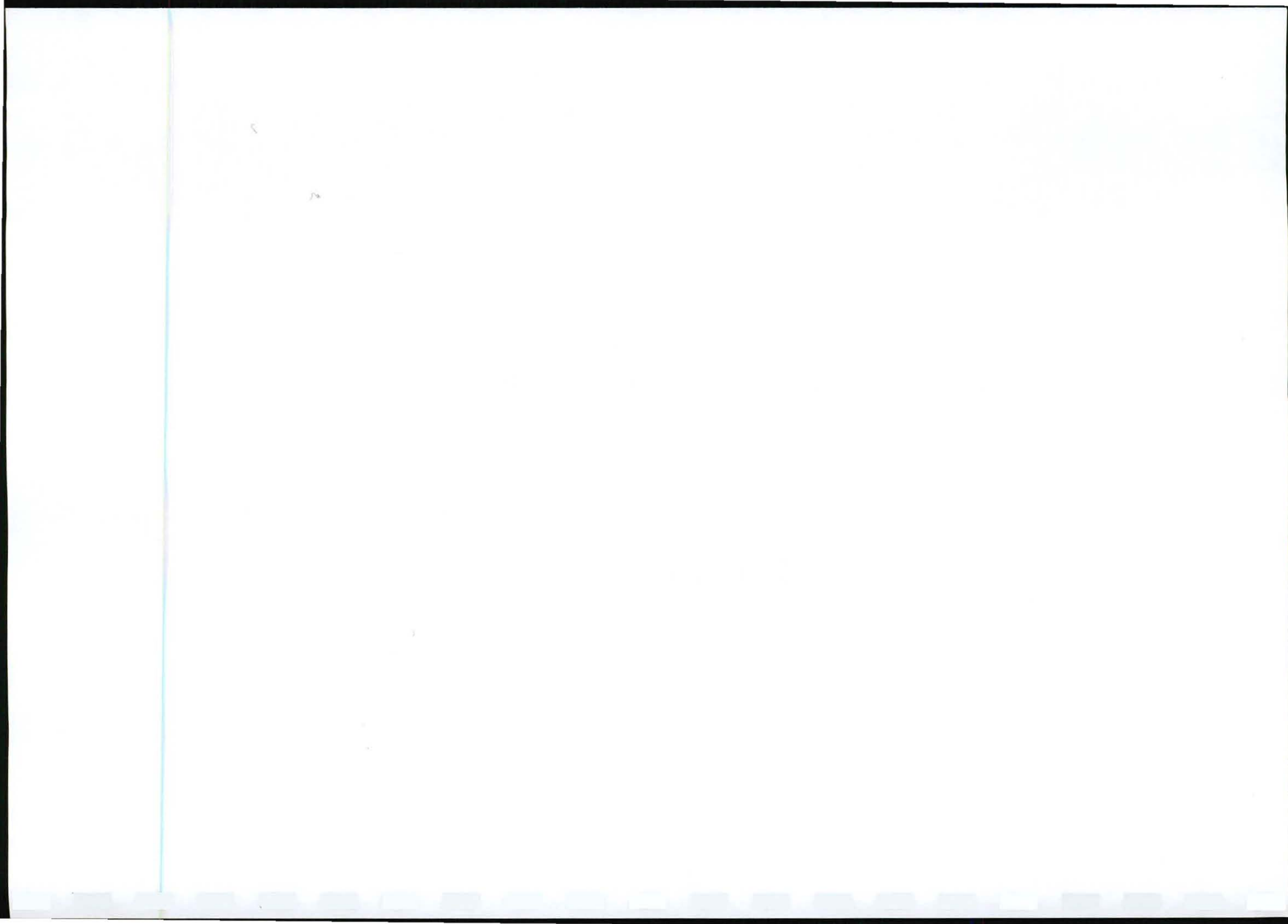


ANNEXURE (b2)
LANDOWNER QUESTIONNAIRS



Juanita Rossouw

From: Juanita Rossouw [juanita@eims.co.za]
Sent: Tuesday, March 24, 2009 3:06 PM
To: 'rbhobson@iexchange.co.za'
Subject: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)] WITHIN THE CANEMERE AREA
Attachments: 0789_MrHobosn_09-03-24_Juanita.pdf

Dear Mr Hobson,

As telephonically discussed this afternoon (24/03/09) would you be so kind as to complete the attached questioner and send it back to us by the date indicated in the letter.

We greatly appreciate your involvement in the proposed process.

Please feel free to contact the undersigned should you have any comments, queries or should you wish to send through additional comments regarding the proposed exploration activity.

Sincerely,

Juanita Rossouw

(M.Env.Sc Remedial and Sustainable Development)

Associate

Cand. Sci. Nat. Reg No. 20017/08

Environmental Impact Management Services (Pty) Ltd

259 Kent Avenue, Randburg.

P O Box 2083, Pinegowrie 2123, South Africa.

Tel: (011) 789-7170 Fax: (011) 787- 3059

Cell: 084 8425000

E-mail: juanita@eims.co.za

www.eims.co.za

<http://environment.blogs.com/>

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Juanita Rossouw

From: Juanita Rossouw [juanita@eims.co.za]
Sent: Wednesday, March 25, 2009 1:17 PM
To: 'tfl@telkom.sa.net'
Subject: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)] WITHIN THE CANEMERE AREA
Attachments: 0789_MrduToitLotter_09-03-19_Juanita.pdf

Dear Mr Du Toit Lotter,

As telephonically discussed this afternoon (25/03/09) would you be so kind as to complete the attached questioner and send it back to us by the date indicated in the letter.

We greatly appreciate your involvement in the proposed process.

Please feel free to contact the undersigned should you have any comments, queries or should you wish to send through additional comments regarding the proposed exploration activity.

Sincerely,

Juanita Rossouw

(M.Env.Sc Remedial and Sustainable Development)
Associate
Cand. Sci. Nat. Reg No. 20017/08

Environmental Impact Management Services (Pty) Ltd

259 Kent Avenue, Randburg.
P O Box 2083, Pinegowrie 2123, South Africa.
Tel: (011) 789-7170 Fax: (011) 787- 3059
Cell: 084 8425000
E-mail: juanita@eims.co.za

www.eims.co.za

<http://environment.blogs.com/>

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DEREK LIGHT

P O Box 431
26 Church Square
GRAAFF-REINET
6280

Attorneys & Conveyancers

e-mail: dlight@intekom.co.za
Telephone: (049) 89-10183/6
Facsimile: (049) 89-22617

Our Ref:Mr Derek Light/ps/W161
Your Ref:JL/hr/20996/LE.B76

07 April 2009

For Attention : Mr Jerome Levitz

Messrs Fluxmans Attorneys
Private Bag X41
SAXONWOLD
2132

BY FAX : 011 880 2261

Dear Sir

YOUR CLIENT : BUNDU GAS & OIL EXPLORATION (PTY) LTD
OUR CLIENT : WOOLHEAD HOLDINGS LTD
POSSIBLE EXPLORATION ACTIVITIES

Thank you for your fax of the 6th instant.

We shall revert to you with a response to the questionnaire shortly.

In the interim, we wish to record that the area is ecologically sensitive and is home to a number of threatened plant and animal species, which our client seeks to protect. It also includes historical buildings and other sites worthy of protection. As a consequence, the property is currently the subject of an application for proclamation as a private nature reserve. If your client intends to pursue its application relating to our client's property, we must insist on a full environmental impact study being done and submitted *inter alia* to us and Petroleum Agency SA and not merely an environmental management programme.

We believe that the provisions of Section 24(2)(a) and (d) of the National Environmental Management : Protected Areas Act applies in these circumstances.

Please confirm that your client will, if it persists in its application relating to our client's property, perform a full EIA for submission to us and the Department.

Yours faithfully

DEREK LIGHT

Vir. Aandag: Guamita Rossouw

Fax: 011 787 3059.

2400

Name and surname:

Property description:

Question	Response
1. Are you the landowner/tenant or are you currently leasing the proposed property?	Eienaar (Landowner.)
2. Can access to the property be obtained for the purpose of visual inspection of the property and if so then please provide contact details?	Ga. Pleas, Kazerhoek tel. Elsies 13, Teerton: 04224 61470
3. For how many years have you been occupying the proposed property?	23 jaar.
4. What is the property currently being utilised for (e.g. intensive agriculture, grazing, ecotourism, etc)?	Ue boerdery (Wending, skaap en bokke.)
5. Are you aware of any environmentally sensitive areas that occur on the property (including but not limited to wetlands, watercourses or areas sensitive to erosion)?	Ga. ("Watercourses, sensitive to erosion.")
6. Are you aware of any unmarked/marked grave sites that occur on the property?	Nee.
7. Are you aware of any physical structures (e.g. buildings) older than 60 years that occur on the property (incl. informal settlement structures)?	Nee.
8. Are you aware of any bushman paintings or archaeological sites on the property?	Nee.
9. Are you aware of any sensitive animal species (such as blue cranes) that are known to occur on the property?	Ga. (Blue cranes.)
10. Are you aware of any sensitive or protected plant species occurring on the property?	Ga. Wit-stamboom ("Shepherd-trees.")

afsendes: Mr. Z.J. deB. Slabbert

242 24 61388

www.leopardvalley.co.za

Name and surname: David Davenport.

Property description: →

Question	Response
1. Are you the landowner/tenant or are you currently leasing the proposed property?	
2. Can access to the property be obtained for the purpose of visual inspection of the property and if so then please provide contact details?	EG Davenport ↗
3. For how many years have you been occupying the proposed property?	082 56 39 561. ↗ Nature
4. What is the property currently be utilised for (e.g. intensive agriculture, grazing, ecotourism, etc)?	Valley Conservancy ↗ Cons
5. Are you aware of any environmentally sensitive areas that occur on the property (including but not limited to wetlands, watercourses or areas sensitive to erosion)?	Leopard Conservate. ! In the process Samar 35000 hectare.
6. Are you aware of any unmarked/marked grave sites that occur on the property?	No Unmark gravel. !
7. Are you aware of any physical structures (e.g. buildings) older than 60 years that occur on the property (incl. informal settlement structures)?	Hist. buildings.
8. Are you aware of any bushman paintings or archaeological sites on the property?	
9. Are you aware of any sensitive animal species (such as blue cranes) that are known to frequent the property?	D. Protecte Faunal ↗
10. Are you aware of any sensitive or protected plant species occurring on the property?	Protected Faunal ↘

Not to Keen.
Safari ii

Name and surname: David Davenport

Property description:

Question	Response
1. Are you the landowner/tenant or are you currently leasing the proposed property?	
2. Can access to the property be obtained for the purpose of visual inspection of the property and if so then please provide contact details?	EG Davenport 082 ⁵ 563 9561
3. For how many years have you been occupying the proposed property?	
4. What is the property currently be utilised for (e.g. intensive agriculture, grazing, ecotourism, etc)?	Hunting, Game.
5. Are you aware of any environmentally sensitive areas that occur on the property (including but not limited to wetlands, watercourses or areas sensitive to erosion)?	Yes, area being applied 4 → www.leopardsvalley.co.za
6. Are you aware of any unmarked/marked grave sites that occur on the property?	Leopard's Valley Conservancy Yes; locations unknown.
7. Are you aware of any physical structures (e.g. buildings) older than 60 years that occur on the property (incl. informal settlement structures)?	Yes
8. Are you aware of any bushman paintings or archaeological sites on the property?	
9. Are you aware of any sensitive animal species (such as blue cranes) that are known to frequent the property?	
10. Are you aware of any sensitive or protected plant species occurring on the property?	Area, STEP; Protected.

Mar: tyd

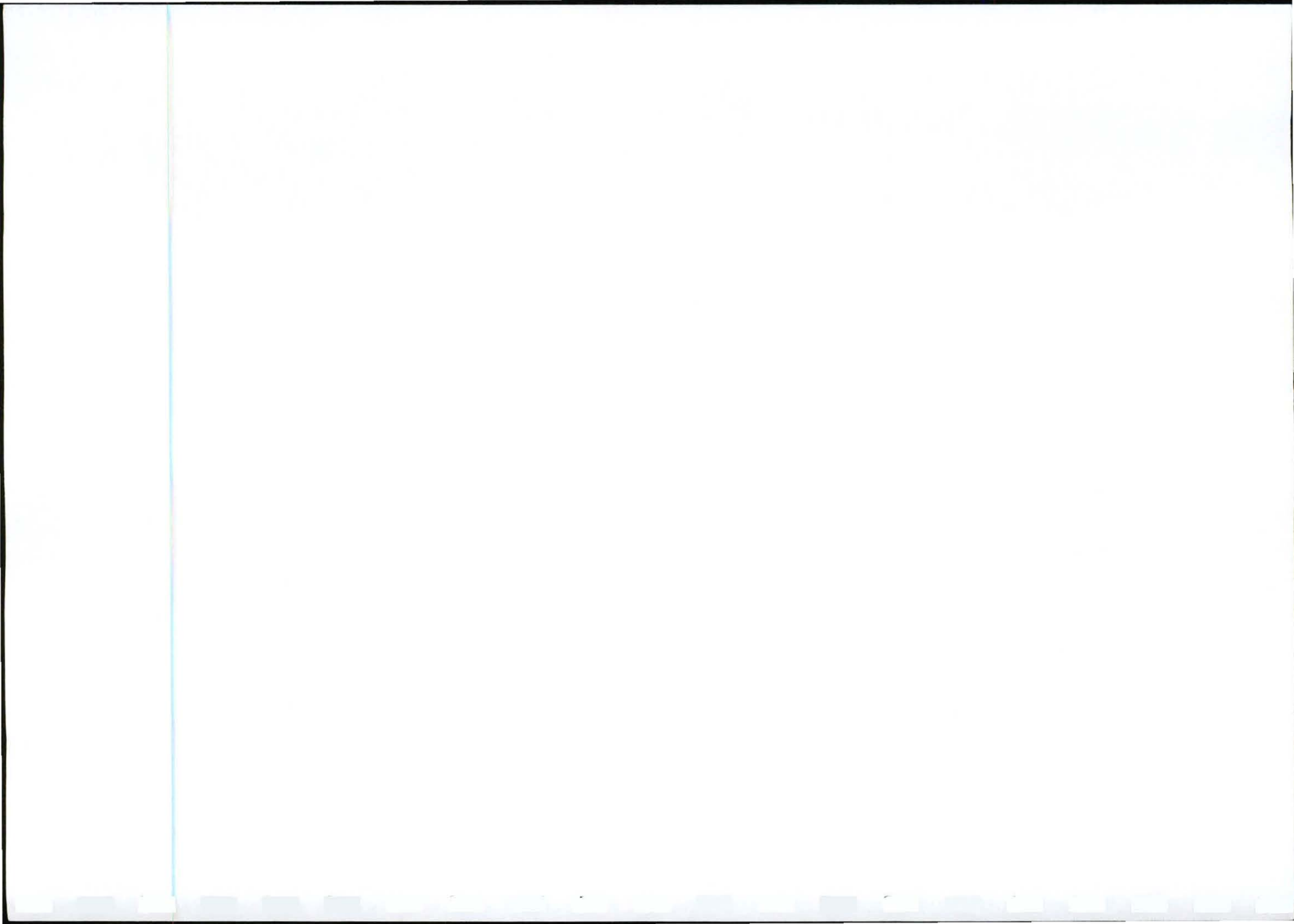
Name and surname: Sonny Davenport

Property description: George Davenport Familie Trust.

Question	Response
1. Are you the landowner/tenant or are you currently leasing the proposed property?	
2. Can access to the property be obtained for the purpose of visual inspection of the property and if so then please provide contact details?	o
3. For how many years have you been occupying the proposed property?	
4. What is the property currently be utilised for (e.g. intensive agriculture, grazing, ecotourism, etc)?	Vleis skaap
5. Are you aware of any environmentally sensitive areas that occur on the property (including but not limited to wetlands, watercourses or areas sensitive to erosion)?	Het Riviere !
6. Are you aware of any unmarked/marked grave sites that occur on the property?	Is grafte . kan nie identifiseer !
7. Are you aware of any physical structures (e.g. buildings) older than 60 years that occur on the property (incl. informal settlement structures)?	
8. Are you aware of any bushman paintings or archaeological sites on the property?	Ja Buur plaas Dinosaur Baesman Teken
9. Are you aware of any sensitive animal species (such as blue cranes) that are known to frequent the property?	Karoo wild Blou kroan voels.
10. Are you aware of any sensitive or protected plant species occurring on the property?	

Goed vergoed word → Sal dit toelaat

ANNEXURE (b3)
PUBLIC MEETING



INTERESTED AND AFFECTED PARTIES MEETING 21 May 2009

Peter Price (PP) started the meeting with a welcome and thanks, and then commenced with the presentation. Mr Andrew Shapland interrupted and asked for the introduction of all the presenters at the front of the room. PP completed his presentation and John Zetzman (JZ) commenced his technical presentation. During the presentation, Mr Shapland asked where the photographs were taken. JZ responded that some were taken in the USA and the drilling rig photograph was from the Free State. Then Mr. Shapland asked if the photograph was of a Highland Exploration drilling rig and PP answered that it was a Beatrix drilling rig in the Free State.

Guy Rogers asked why we were interested in drilling in this area considering SOEKOR had been unsuccessful earlier. (JZ) indicated that it is not unusual to have success in an area after some one else had failed. Mr. Rogers asked that JZ be more specific and reveal what research had been done to come to the conclusion that we could be successful. JZ indicated that Bundu declined to disclose its technology and intellectual property.

Mr. Derek Light stood up and said that the meeting was not structured to his satisfaction and to adequately explain our activities. JZ responded that the meeting was to inform the public of the drilling process at which time Mr. Shapland stated that JZ was not answering the question. Mr. Light asked that we again explain the procedures and that this was a statutory meeting. PP responded that the meeting was to explain what was being proposed as well as the process that is to be followed and to explain the environmental study. Mr Guy Rogers asked again what the motivation was for our application. PP explained the exploration right process.

Mr Thabo Grootboom wanted to know what benefits Bundu would be bringing to the people. JZ responded that one of the largest natural gas plays in the US is taking place in the Dallas- Fort Worth area. Billions of dollars have been pumped into the region and 65,000 jobs have been brought to the region as a result. If this play is successful, jobs could be created and tax revenues increased dramatically.

Mr. F. Rossouw / DEDEA responded by warning Bundu that I can see that expectations were already created that they will create numerous jobs and that if they do not create any substantial jobs they will certainly not get any support from the folk of Pearston. He further suggested that if Bundu held a similar meeting in future they should get either someone from the Dept. of Mineral and Energy Affairs to explain exactly the procedures that must be followed if an application is received to carry out prospecting. If the people knew exactly how the process work and understand it and that there might not even authority be granted then you might have not have the problems in chairing the meeting as the people were confused as they do not understand the process.

Mr. Shapland asked if Bundu was registered in 2007, and the response was yes. Shapland then asked what experience Bundu had in successful completion of oil and gas projects. JZ responded that the principals of Bundu are successful oil and gas professionals and recently formed Bundu to execute projects in South Africa. PP took it further and explained that Bundu has one other application filed and is about to file a third on projects in South Africa. Shapland made a statement that PP was not disclosing the technology Bundu proposed to use and that PP responded that PASA is the body that determines whether or not Bundu's proposed technology is sufficient.

Mr Grootboom suggested that Bundu be allowed to finish the presentation before being questioned. Mr. James asked who Mr. Shapland was and what his interest was in the process. Mr. Shapland answered that he is a travel agent who represents several clients' lodges. Mr. James continued that the game reserve has brought no benefits to the people of Pearston.

Mr. Japhta requested once again that the Bundu representatives be allowed to continue the presentation and that questions be asked afterwards. He further indicated that he would like to know what benefits Bundu would bring and how it would help the people in the area. JZ went on to explain that Bundu is made up of experienced oil and gas professionals and that research

activities are small scale, localized and short term, the exploration would not have a significant impact on ecotourism.

Rogers asked what would happen in the event of a landowner not wanting a well drilled on his property. PP responded that Bundu would contact the landowner and try to negotiate the drill site and if the two parties could not come to terms, PASA would be the ultimate arbitrator.

Mr. Slabbert asked who would cover landowner's legal costs if there was a dispute. PP said each party would pay their own but Bundu hoped to have good enough relationships so that this type of dispute would be avoided.

Mr. Shapland asked if expropriation would be undertaken. To which PP said he didn't know.

Mr Whitou then completed his presentation.

Mr. Derek Light announced who he was and who he represented.

He said that

- we did not tell everyone how the meeting was to be conducted.
- in his opinion the doors have been closed and there has been no access to documentation.
- he wants to record that we and the Agency have not followed the processes prescribed by the law references section 79(4).
- the community have not been notified of their right to comment on the process.
- access to information act requires the public must be informed and that in his opinion, showing photos of the type of operation does not constitute notification/consultation.
- it was not good enough to render only an environmental management program
- the NEMA act requires a full EIA must be done.
- we have a duty of care and that duty overrides any other per NEMA.
- geological information indicates that there is no gas here.
- SOEKOR says there was no gas here and that a local geologist confirms that and that Bundu has not presented evidence to the contrary.
- we did not tell the people here or the Agency that SOEKOR did not find any gas.
- He believes the process is unfair and unlawful and he is not convinced of our technical or financial capability.
- He understands that we have foreign shareholders.
- we claim we will create 65,000 jobs (JZ responded that that number was used as an example of job creation in the Dallas-Fort Worth area).
- we must have BEE now and disclose who they are.
- we will disturb farming, game farms, etc.
- he wants to know if we will listen to our environmentalist.
- he wants to know exactly how we are going to drill our wells.
- we must follow "Promotion of Administration Act".
- we have not provided a plan for upliftment .
- a copy of our current application has not been provided to IAPS.

We inquired whether there were any additional comments or questions and it was suggested from the participants that we adjourn the meeting .

BUNDU GAS AND OIL EXPLORATION (PTY) LIMITED

(Reg. No. 2007/034535/07)

Registered Office:
38 Fouche Terrace
Morninghill, Bedfordview
2007
Johannesburg
Gauteng, South Africa
Telephone: +27 (0) 83 628-9190
Facsimile: +27 (0) 86 623-8874

CRANMERE - EASTERN CAPE PROVINCE

ATTENDANCE REGISTER

INTERESTED AND AFFECTED PARTIES MEETING

(MAY 21, 2000)

eddieb@dispatch.co.za

NAME	ORGANISATION / FARM	ADDRESS	TELEPHONE	FAX	
Eddie Botha	Daily Dispatch	35 Cayle St. EL	083 708 2721	043 7435155	✓
Sonny Dawsonport	Ashbourne	P.O. Box 21	042- 24614917	X	✓
Marilyn Wilson	Samara Private Game Res.	PO Box 649 Graaff Reiner	049- 8910880	049 8924339	X
Chad Pretorius	Samara	"	"	"	X
Percy Ndzotoy	Samara	"	"	"	X
Daniël Nortje	SAMARA	"	"	"	X
Bradley Gibbons	Endangered Wildlife Trust	PO BOX 40 MIDDELRIVIER, EC 5900	082566 5803 bradleyg@ewt.org.za	088009 842116	✓
G.T. Botha	WATERSKOPSWAARD	PO Box 18 PEARSTON	042- 2461499 gog@zankke.net	geogic@lantic.net	✓
A. Slabbert	Kareekhoek	Postbus 13 Pearston	0422461470		}
A. Slabbert	Kareekhoek	Postbus 13 Pearston	0422461470 0422461470		

INTERESTED AND AFFECTED PARTIES MEETING
(MAY 21, 2000)

polka.co.za

NAME	ORGANISATION / FARM	ADDRESS	TELEPHONE	FAX
^{Miller} P. Miller	Sturk Hof	400 Voortrekker startafca Sturk Hof Pearson	042-2461981	042 246 1281
L.A. James	ANC Vukuzenzele	29 LAWSON ST	6820835572	alieliyaangat@vodamail.co
J. Minberg	18 Hudsons st	18 Hudsons st	0833277040	042-2461961
J. Claassen	TAXI	116 GARDEN TO HISTORIC 4 PEARSON	0736534444	
B. Daweyer	Widgerhof Trust	P.O BOX 24 Pearson	082 3221864	042 2461534
R. Hobson	JACKSON	PO BOX 32 PEARSON	0845122172	rbhobson@lexch coza
A. Palmer	Crane Hill	Box 6 Pearson	012-24 61492	Same
P. Jansen	PEA Liquors	PEARSON	0846034536	liquors@jabanna.co.za
M. DAVENPORT	H.C.D. KwaZulu	PEARSON	0722120303	liquors@jabanna.co.za
W. KRITZINGER	AGRI-EC	NEWTOWN PARK P.E. Box 3045	041-3631890	Sharlene.mathews@agrieq coza
A. JACKSON	WILDERNESS FOUNDATION	RUSTENBURG FARM	0826127601	humblelittlestone@hotmail.co
Z. DORO	B.C.R.M	15 PORTER ST	0748710234 042-2461150	042-2461654

**INTERESTED AND AFFECTED PARTIES MEETING
(MAY 21, 2000)**

NAME	ORGANISATION / FARM	ADDRESS	TELEPHONE	FAX	
William	COPE	11 VANDERBLOEK	042 2461220		
Rose Doto	CPF	Princeton Rd	0797660817*		✓
G. Minkford	COPE	117 Hester St	072 338595		✓
H. Hassen	Blakenage	Box 163 GR	087 5638058 harrymarg@wam.co.za		✓
A.D. Hobson	"	114 Somerset St GR	087 783 2183 camdel00@isat.co.za		✓
Toit Lötter	Wettersden/ Waldsteyn	Box 59 Waldsteyn Pretoria	052 7825235 tfl @ telkam.sa.net 042 2461107		✓
M.A. MENE	BCRM	Somerset East	062 243 1333		
C. Matomela	Somelereze	10 Prince	0725068439		✓
A. Lamm	SOMEREZE CAT	H. LAWSON ST	042 2461701		✓
S. Jones	BCRM	1025 KANGIISO YEAPSO.	0326 571342		✓
D. Davenport	Pentoxide	Libstar farm P.O. Box 23	042 2461388 082 7167681.	088 042 2461388 Im Specim!	✓
a Heider	Wilderness Foundation	Onverwagt, Cambridge	She was a student.		
A. Tanner	Wilderness Foundation South Africa	Roston/ DE	041 3730293 083 6232565		✓

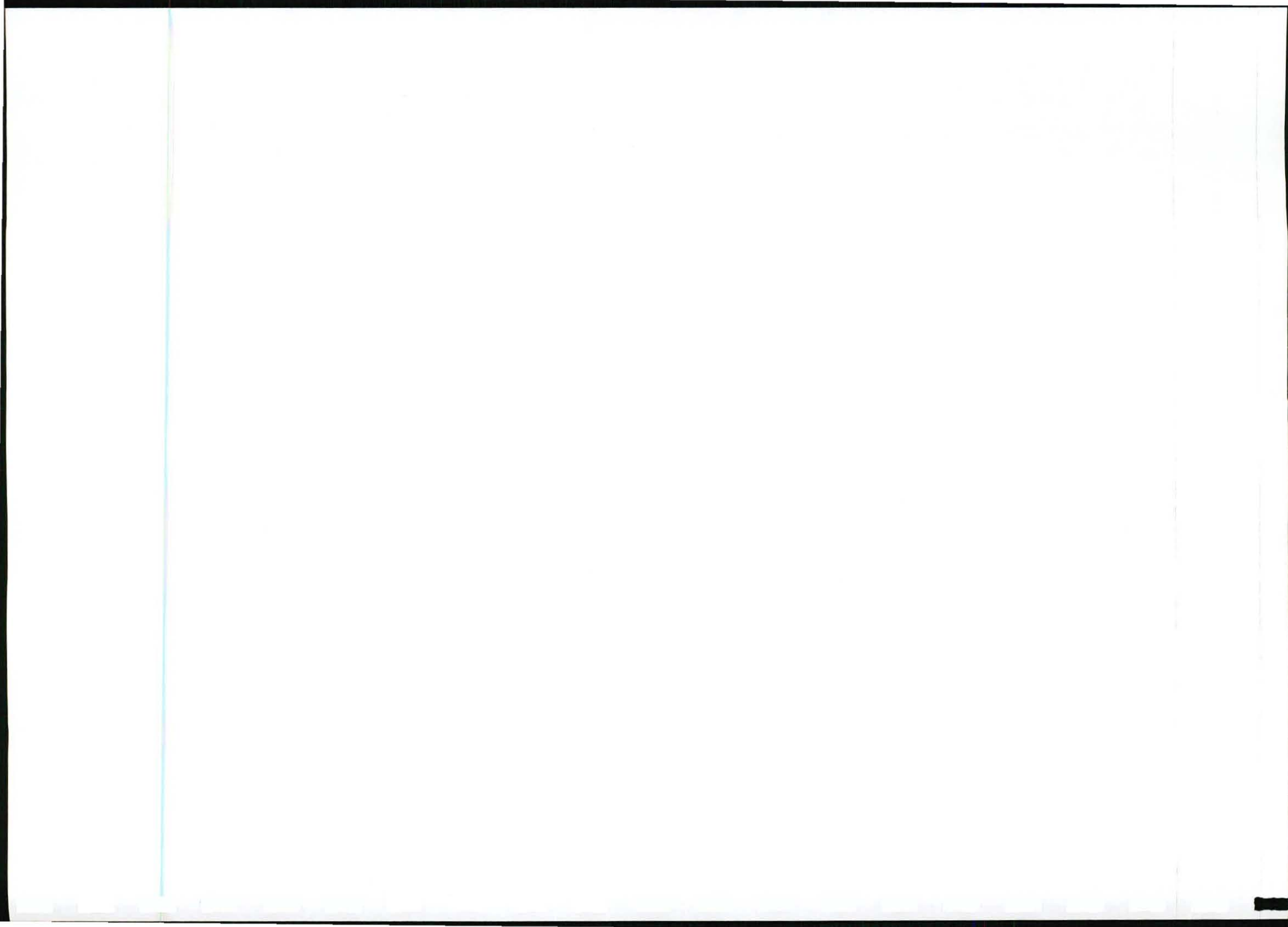
angus @ sa.wild.org

**BUNDU GAS & OIL INTERESTED AND AFFECTED PARTIES CONSULTATION
TELEPHONE RECORD OF COMMUNICATION RE MINUTES**

Person Contacted	Farm/Organisation	Telephone No.	Comments
Eddie Botha		0837082721	eddieb@dispatch.co.za ✓
Bradley Gibbons		0825665823	bradleyg@ewt.org.za ✓
G.J. Botha		0422461499	geogie@lantic.net ✓
M.E. Boro		0829448515	no email - will collect at hotel.
Guy Rogers		041 504-7425	Didn't speak to him. Got email address rogerg@avusa.co.za ✓
Eddie Bleth-Rite		0724403473	fiser@telkam.sa.net ✓
Mrs Frohlich		0422461344	no email - will collect at hotel
D. Japhta		083945 3168	will send test page with email address on
Thabo Grootboom		082735 8907	asked if we could fax - told him about copies at hotel - he said he would collect.
F. Rossouw		049-8923755	frikkie.rossouw@deact.escape.gov.za ✓ *
P. Burdett		0829013373	peterbw@sanparks.org ✓
J. Charlie		079714 2786	no email - will collect at hotel

Person Contacted	Farm/Organisation	Telephone No.	Comments
LA James	0	082 083 5572	alieliyaaqat @ vodamail .co .za ✓
J Classen		073633 4641	will pick up copy on Thursday.
T Claasen		0832993 723	will pick up copy on Thursday
P.B Miller		042 246 1281	starcafe @ polka . co .za ✓
R. Hobson		0845122172	rbhobson @ iexchange .co .za ✓
P. Davenport		084602 4536	liquors @ jabama . co .za ✓
H. Davenport		072 2120303	liquors @ jabama . co .za ✓
W. Kritzinger		0413631890	sharlene . matthews @ agriec . co .za ✓ 0
A. Jackson		0826127601	humble little stone @ hotmail . com . ✓
Z. Dorro		074 8910234	will pick up copy at hotel
Rose Dorro		0797660817	will pick up copy at hotel.
G. Minstoor		072,3389595	will pick up copy at hotel.
H. Hobson		0825638058	harrymarg @ wam . co .za ✓

Person Contacted	Farm/Organisation	Telephone No.	Comments
H.D. Hobson		082 783 2183	camdeboo@isat.co.za.
Tait holler		082 782 5235	tf1@telkom.sa.net 7 2
C. Matomela		0725068439	will collect from the hotel!
A Lauw		04 22461701	will collect from the hotel
S. Jonas		0826571342	will collect from the hotel.
D. Davenport		082 774 7689	dave@leopardvalley.co.za. ? 0
A. Tanner		041 373 0293	angus@sa.wild.org.
S. Davenport		042 2461497	will collect from hotel



ENVIRONMENTAL MANAGEMENT PROGRAMME

- Environmental Impact Management Services (EIMS) appointed to assist in preparing the EMPR by Bundu Gas and Oil Exploration.
- Primary objectives of an EMPR:
 - Baseline investigation and description of receiving environment; and
 - Determine protection, remedial measures and environmental management objectives.

RECEIVING ENVIRONMENT

- Based on available spatial data and feedback received from the Interested and Affected Parties (I&AP's) the following key features of the study area were identified:
 - Soils in the study area are vulnerable to erosion, especially on the slopes with a gradient steeper than 9%;
 - Study area includes 4 different vegetation units, all of which are designated as least threatened;
 - Vegetation units are vulnerable to alien invasive plants;
 - The NSBP defines a large portion of the area as endangered and can withstand only very minimal loss of natural area through disturbance or development;
 - Study area includes a section of formal Nature Reserves (Samara);
 - Study area includes a proposed new conservancy (Leopards Valley Conservancy);
 - Study area likely to contain red data flora and / or fauna;
 - Surface water features in the study area (rivers and associated tributaries) are sensitive features;
 - Water supply is a concern;
 - Visually sensitive due to sparseness of vegetation and proximity to sensitive receptors (e.g. Samara); and
 - Area contains many informal cultural and heritage features.

Phase	Baseline Investigation		Project Design		Implementation		Monitoring and Reporting	
	Activity	Objective	Activity	Objective	Activity	Objective	Activity	Objective
Phase 1	No reports associated with Phase 1 of the proposed exploration activity have been identified.							
Site Preparation	Loss of vegetation due to potential construction of access roads and clearing of area for construction of camp sites.	Impact on vegetation, flora and wildlife areas during site establishment.	Control of topography and vegetation.	Minimize impact of roads.	Minimize erosion contribution to the area due to temporary roads of access.	Revegetation of disturbed areas.	Revegetation of disturbed areas.	Revegetation of disturbed areas.
	Loss of potential flora and fauna habitat within the proposed project area.	Loss of potential flora and fauna habitat within the proposed project area.	Control of topography and vegetation.	Minimize impact of roads.	Minimize erosion contribution to the area due to temporary roads of access.	Revegetation of disturbed areas.	Revegetation of disturbed areas.	Revegetation of disturbed areas.
Primary Roads	Disturbance of natural habitat due to potential clearing of vegetation.	Disturbance of natural habitat due to potential clearing of vegetation.	Control of topography and vegetation.	Minimize impact of roads.	Minimize erosion contribution to the area due to temporary roads of access.	Revegetation of disturbed areas.	Revegetation of disturbed areas.	Revegetation of disturbed areas.
	Disturbance of natural habitat due to potential clearing of vegetation.	Disturbance of natural habitat due to potential clearing of vegetation.	Control of topography and vegetation.	Minimize impact of roads.	Minimize erosion contribution to the area due to temporary roads of access.	Revegetation of disturbed areas.	Revegetation of disturbed areas.	Revegetation of disturbed areas.
Infrastructure Development	Disturbance of natural habitat due to potential clearing of vegetation.	Disturbance of natural habitat due to potential clearing of vegetation.	Control of topography and vegetation.	Minimize impact of roads.	Minimize erosion contribution to the area due to temporary roads of access.	Revegetation of disturbed areas.	Revegetation of disturbed areas.	Revegetation of disturbed areas.
	Disturbance of natural habitat due to potential clearing of vegetation.	Disturbance of natural habitat due to potential clearing of vegetation.	Control of topography and vegetation.	Minimize impact of roads.	Minimize erosion contribution to the area due to temporary roads of access.	Revegetation of disturbed areas.	Revegetation of disturbed areas.	Revegetation of disturbed areas.

ENVIRONMENTAL MANAGEMENT PLAN

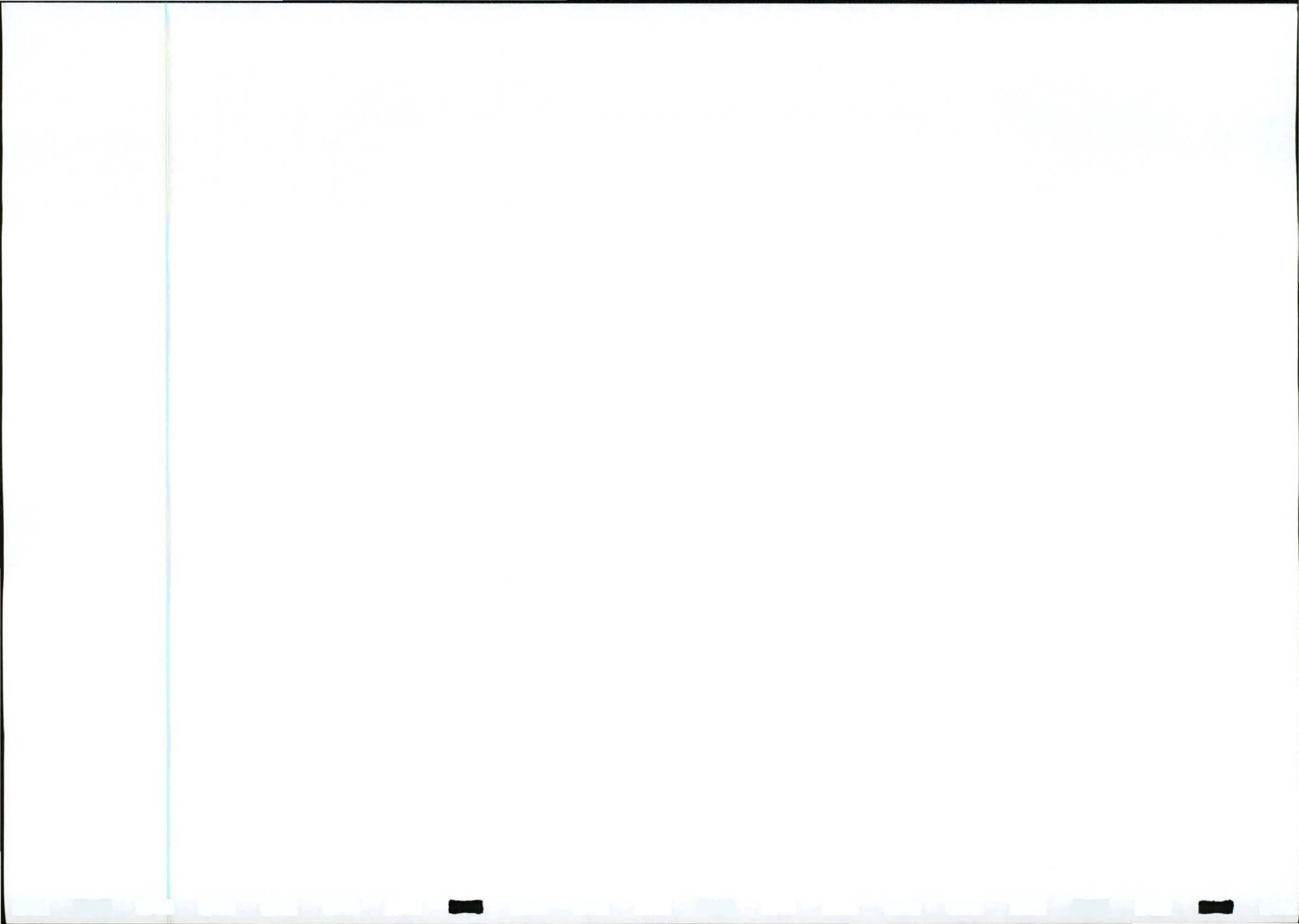
- The EMP has the following main objectives:
 - EMP sets out the methods by which proper environmental controls are to be implemented by the contractor and or the Applicant.
 - A guideline for the mitigation and management measures to be implemented during the establishment, operational and rehabilitation phase of the exploration activity.
 - Provides specifications and regulations that must in all instances be adhered to.
- Failure to comply with the EMP will likely result in the suspension of part or all of the works if the contractor and or the Applicant causes damage to the environment by not adhering to the specifications set within the EMP.



KEY FINDINGS

- > The study area contains many sensitivities which need to be considered;
- > The EMP recommends management and mitigation measures to help reduce the significance of the negative impacts;
- > The precise identification of sensitivities and accurate prediction of impacts is hampered by the fact that the drill sites are yet to be identified. The following recommendations are made to help address this:
 - > The following areas should be avoided where possible:
 - > Steep slopes with a gradient exceeding 9%;
 - > Formally protected areas (Samara Game Reserve);
 - > Within 50m from any stream, wetland or river; and
 - > Within 100m from any occupied residential dwelling.
 - > Once the proposed drill sites are identified the following must be undertaken:
 - > A specialist EAP or Ecologist to undertake a site assessment to identify any sensitive flora and or fauna and make specific recommendations (including relocation of drill site if possible);
 - > A Heritage survey to be undertaken of the sites by a qualified specialist;
 - > A pre-exploration hydro census; and
 - > Landowners to be consulted.
 - > Prior to establishing a new drill site the existing drill site must be decommissioned (therefore no more than 1 drill site at any one time).
 - > A detailed site specific rehabilitation plan to be prepared by a suitably qualified specialist prior to commencement of drilling and provided to the landowner.
 - > An EAP must conduct a final close-out audit following rehabilitation and submit such to the authority.
- > Following exploration a production right will need to be obtained (if feasible)- this requires further public consultation, a full EIA process, and another EMPR.

ANNEXURE (b4)
COPIES OF CONSULTATION
WITH I&APs



- Tel: +27 (11) 328-1700, Fax: +27 (11) 880-2261
- 11 Biermann Avenue, Rosebank
Johannesburg, 2196, South Africa
- Private Bag X41, Saxonwold, 2132, South Africa
- Docex 54 Johannesburg, Website: www.fluxmans.com
- Fluxmans Inc. Registration No: 2000/024775/21

Our Ref : JL/hr/103214_6.2

Writer's Direct Line: 011 328 1820

Your Ref : Mr Derek Light/ps/W161

Email: jlevitz@fluxmans.com

Date : 19 June 2009

BY EMAIL

DEREK LIGHT

Per Email: dlight@intekom.co.za

Dear Sirs

BUNDU GAS & OIL EXPLORATION (PTY) LIMITED / WOOLHEAD HOLDINGS LIMITED

1. We enclose herewith a copy of Herold Gie Attorney's letter dated 18 June 2009 addressed to ourselves, together with our response thereto.

Yours faithfully



J LEVITZ
FLUXMANS INC.

Directors: P Vallet (Chief Executive Officer), JK Antunes, MS Bloom, GB Brett, T Brett, C Carides, L dos Passos, I Epstein, S Fisher, J Fung, D Furman, P Kampel, D Kaufmann, LA King,
A Kruger, J Levitz, BF Marques, D Mer, EG Migdal, J Ndebele, AM Nikani, JH Phalane, F Rodrigues, J Shafir, CB Shapiro, SA Shoot, S Slom, AC Soldatos, CJ Strime, EB Tonini,
CE Wannell
Chief Operating Officer: J Klotnick C.A. (S.A.)
Senior Associates: B Blumenthal, S Perlman
Associates: BE Duma, J Levitan, CL Masvikwa, BG Ndlovu, AK Shardlow
Consultants: GB Rubenstein, H Mer, AB Rubenstein, MW Jelley
Office Manager: H Smit

Our Ref : JL/hr/103214_10

Writer's Direct Line: 011 328 1820

Your Ref : LAW/ddt

Email: jlevitz@fluxmans.com

Date : 19 June 2009

BY TELEFAX

HEROLD GIE ATTORNEYS

Per Telefax: 021 461-1202

ATT: MR L A WHITTAKER

Dear Sirs

BUNDU GAS & OIL EXPLORATION (PTY) LIMITED / WOOLHEAD HOLDINGS LIMITED

1. We confirm receipt of your telefax dated 18 June 2009.
2. Save for what is stated herein below, we do not intend dealing with any of the allegations contained in your letter under reply and our failure to do so shall not be construed as an admission by our client who reserves the right to deal with each and every allegation in the appropriate forum at the appropriate time should the need arise.
3. Our client does not wish to engage in a debate with your client as to what occurred at the meeting.
4. Our client accordingly undertakes to:
 - 4.1 attach a copy of your letter to the minute it will submit to Petro SA (Pty) Limited;
 - 4.2 send a copy of your letter to Derek Light Attorneys.

Yours faithfully

Directors: P Vallet (Chief Executive Officer), JK Antunes, MS Bloom, GB Brett, T Brett, C Carides, L dos Passos, I Epstein, S Fisher, J Fung, D Furman, P Kampel, D Kaufmann, LA King,
A Kruger, J Levitz, BF Marques, D Mer, EG Migdal, J Ndebele, AM Nikani, JH Phalane, F Rodrigues, J Shafir, CB Shapiro, SA Shoot, S Slom, AC Soldatos, CJ Strime, EB Tonini,

CE Wannell

Chief J Klotnick C.A. (S.A.)

Operating
Officer:

Senior B Blumenthal, S Perlman

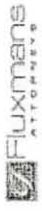
Associates:

Associates: BE Duma, J Levitan, CL Masvikwa, BG Ndlovu, AK Shardlow

Consultants: GB Rubenstein, H Mer, AB Rubenstein, MW Jelley

Office H Smit

Manager:



A handwritten signature in black ink, appearing to read 'J. Levitz', written in a cursive style.

J LEVITZ
FLUXMANS INC.



HEROLD GIE

ATTORNEYS

Herold Gie Buildings, 8 Darling Street, Cape Town 8001
PO Box 105 Cape Town 8000 South Africa
Docex 52 Cape Town Website www.heroldgie.co.za
Facsimile 021 461 1202 Telephone 021 464 4700

FLUXMANS INCORPORATED

ATTENTION: JEROME LEVITZ

VIA E-MAIL jlevitz@fluxmans.com and
hrossouw@fluxmans.com

Your Ref JL/hr/103214_8
Our Ref LAW/ddt
Direct Tel 021 – 4644776
E-Mail lwhittaker@heroldgie.co.za
Date 18 June 2009

Dear Sirs

RE: BUNDU GAS & OIL EXPLORATION (PTY) LIMITED / WOOLHEAD HOLDINGS LIMITED

We act on behalf of Tourism Corporation Africa Ltd and its Managing Director, Andrew Shapland, and we refer to your e-mail addressed to Andrew Shapland dated 18th June 2009 with annexed draft Minutes of the public meeting held on 21 May 2009 in regard to the above matter. Our clients have instructed us to record the following:

1. Andrew Shapland attended the meeting in his capacity as duly authorised agent of Sarah Tompkins, at her request and for her account.
2. Mr Shapland did not indicate at the meeting that he was "a travel agent who represents several clients' lodges" as reflected in your draft Minutes. As stated above, Mr Shapland is the Managing Director of Tourism Corporation Africa Limited which is involved in marketing the tourism and hospitality sectors of Southern Africa. Tourism Corporation Africa represents a collection of some of the finest hotels and game lodges on the Continent. Mr Shapland personally ranks amongst the most highly qualified persons in this Country in marketing tourism and hospitality. Incidentally, Mr Shapland gave this information to the meeting, in response to a request made at the meeting that he identify and profile himself.
3. The draft Minutes also incorrectly record that Mr Andrew Shapland interrupted the meeting (vide second line of the draft). Mr Shapland did not interrupt the meeting but was in fact part of the process of the meeting itself. Mr Shapland raised his hand and was acknowledged by the Chair of the meeting. Mr Shapland requested that Messrs Bundu Gas & Oil Exploration and its representatives introduce themselves as is normal in any presentation. This request was apparently declined.

Our clients call for the draft Minutes to be amended accordingly and we await your confirmation and circulation to all parties including attorney Derek Light and Petro SA (Pty) Limited – Mr Mthozami Xiphu, of the amended Minutes. In the interim we call upon you to acknowledge receipt of this communication and to make note of the fact that all future communications to Mr Andrew Shapland and/or Tourism Corporation Africa are to be addressed to the writer for attention and response

Kindly acknowledge receipt.

Yours faithfully

HEROLD GIE

per:


L.A. WHITTAKER

Commercial, Property, Employment, Banking, Insolvency & Commercial Recoveries, Trusts & Estates, Insurance, Personal Injury, Matrimonial, Sport & Sponsorship Law

DIRECTORS: Lawrence Whittaker BA LLB Cert.Sports Law (UCT) (Chairman), Linda Jordaan BA LLB P.G Dip Tax Law (Chief Executive), David Lotz, Peter Davis BProc, Richard Moffat BA LLB, John MacRobert BA LLB LLM Adv Dip Labour Law, Henry Stubbings BA LLB, Derek Mandy BA LLB, Alastair Wylie BA LLB, Pierre le Roux BA LLB Hons(B and A), Martin Vermeulen B Rec (Acc) LLB, Richard Brown BA LLB, Shekesh Sirkar BA LLB, Renée van den Heever B Proc, LLM (Family Law), Lungelo Matiwane BJuris LLB, Stefan le Roux BCom LLB, PG Dip Tax Law, René Fourie BCom LLB, Karin MacKenzie B Mus MMus BProc LLB **ASSOCIATES:** Nicole Greyling LLB, LLM (Commercial Law), Marguerite Greeff LLB, Phathiswa Genqese LLB, Taryn Loynes BCom LLB, **FINANCIAL MANAGER:** Ian Daitsh CA (SA)

liam whitlow

From: Tourism Corporation Africa (The Roving Ambassador) [andrew@tourismcorp.co.za]
Sent: 17 June 2009 03:29 PM
To: Heidi Rossouw; dlight@intekom.co.za
Cc: Sarah Tompkins; sleroux@heroldgie.co.za; Tourism Corporation Africa (Shereeze)
Subject: The Roving Ambassador / Samara Private Game Reserve:

THE ROVING AMBASSADOR



Dear Mr Levitz.

Without Prejudice:

Thank you for your mail.

This letter acts to confirm that as a "Roving Ambassador" prestigious organisations and airlines in this country.

Mnr le Roux of Herold Gie Attorneys in Cape Town, our that Mr Light and Mr and Mrs Tompkins's are now to de: neither The Ambassador or his name, or that of our firm i at all, in this case. Due to his extensive travels and comm and Mr Light are best able to deal with the matter in ques

This case lies between your clients - Bundu Gas and Oil (Tompkins / Woolhead Holdings (Pty) Ltd.

Mnr le Roux is currently undertaing conversion to the La Pretoria and can be reached on 083 239 0134. Mr. Light : informed of said.

Please confirm receipt of this mail and the contents there

The Roving Ambassador will have no further dealings wi be directed to Mnr le Roux, at Herold Gie Attorneys. He your client should have any further reason to contact the . of this letter reflects all.

Our only interests so far as Samara Private Game Reserv interest in given target market which of course is and has

Sincerely.

Shereeze Latchman
 On behalf of The Roving Ambassador
 Andrew Shapland.

From: Heidi Rossouw [mailto:hrossouw@fluxmans.com] **On E**
Sent: 02 June 2009 08:20 AM
To: dlight@intekom.co.za
Subject: BUNDU GAS & OIL EXPLORATION

<<IAP meeting 21 May 2009 (ABF).doc>>

Heidi Rossouw
 Secretary to **JEROME LEVITZ**
FLUXMANS INC.
 11 Biermann Avenue, Rosebank
 Johannesburg, South Africa.
 Docex 54, Johannesburg.
 Private Bag X41, Saxonwold, 2132.
Direct line: +27 11 328-1805
Fax: +27 11 880-2261
Website: <http://www.fluxmans.com>

A list of Fluxmans directors can be found in the 'Company Profile' section on our w

To view our e-mail disclaimer please click on the following link <http://www.fluxma>
 not have Internet access please send a blank e-mail to disclaimer@fluxmans.com.

WEB: www.tourismcorp.co.za

2009/06/19

DEREK LIGHT

P O Box 431
26 Church Square
GRAAFF-REINET
6280

Attorneys & Conveyancers

e-mail: dlight@intekom.co.za
Telephone: (049) 89-1018316
Facsimile: (049) 89-22617

Our Ref: Mr Derek Light/ps/W161
Your Ref: JL/hr/20996/LE.B76

18 June 2009

For Attention : Mr Jerome Levitz

Messrs Fluxmans Attorneys
Private Bag X41
SAXONWOLD
2132

By Email : jlevitz@fluxmans.com

Dear Sir

YOUR CLIENT : BUNDU GAS & OIL EXPLORATION (PTY) LTD
OUR CLIENT : WOOLHEAD HOLDINGS LTD
POSSIBLE EXPLORATION ACTIVITIES

We are in receipt of your email of 18 June 2009 with the report from EIMS.

Whilst our clients' rights remain reserved, the positive response is to be welcomed.

Yours faithfully

DEREK LIGHT

liam whitlow

From: liam whitlow [liam@eims.co.za]
Sent: 15 June 2009 02:07 PM
To: 'Jerome Levitz'
Cc: 'Peter Price'; 'John Zetzman'
Subject: Bundu_Response to Mr Light
Attachments: 0789_Response to Derek Light-protected_09-06-04_Liam.pdf

Hi Jerome,

Please receive attached hereto our response to the relevant queries raised by Mr Light.

Please could you forward to Mr Light?

Kind regards,

Liam Whitlow
Associate
Environmental Impact Management Services (Pty) Ltd
259 Kent Avenue, Randburg.
P O Box 2083, Pinegowrie 2123, South Africa.
Tel: (011) 789-7170 Fax: (011) 787- 3059
www.eims.co.za

<http://environment.blogs.com/>

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2009/06/18

Environmental Impact Management Services (Pty) Ltd
Registration Number: 92/05927/07
Director: Teboho. Nkhahle



Leaders in Environmental Management

15 June, 2009

Our ref: LW/lw/0789/

Bundu Gas and Oil Exploration (Pty) Ltd

Response to Derek Light Attorneys Submission

This letter serves to respond to the relevant aspects and questions raised by Mr Derek Light submitted by hand to Mr Liam Whitlow of Environmental Impact management Services (Pty) Ltd (EIMS), on the 21st May 2009, for and on behalf of Woolhead Holdings as well as Samara Private Game Reserve.

The submission made by Mr Light consisted of 6 separate parts, namely:

- o Part 1: Letter addressed to EIMS, titled '*Application for Exploration Rights: Bundu Gas and Oil Exploration (Pty) Ltd ("Bundu")*';
- o Part 2: Document titled '*Annexure in Re. Environmental Considerations*';
- o Part 3: List of prominent trees and tall shrubs, marked as 'A';
- o Part 4: Document titled '*Why Gas Mining is Not the Best Sustainable Land Use in the Samara/ Graaff-Reinet Region*' marked as 'B';
- o Part 5: Document titled '*Revitalising the Great Karoo to the Way it Was*' marked as 'C'; and
- o Part 6: Document titled '*List of Questions for and on behalf of Woolhead Holdings Limited and Samara Private Game Reserve (Pty) Ltd to the Applicant, Bundu Gas and Oil Exploration (Pty) Ltd and Their Consultants, Environmental Impact Management Services (EIMS) in Re. Application for Exploration Rights for Gas in Terms of Section 79 of the MPRDA: Public Meeting on 21st May 2009*'.

This document has been prepared by EIMS on instruction from Bundu (also known as the Applicant) and is structured such that each Part (as listed above) is dealt with in separate sections. EIMS has attempted to respond to all relevant questions and statements.

Environmental Impact Management Services (Pty) Ltd

Registration Number: 92/05927/07

Director: Teboho. Nkhahle

PART 1	
Reference	EIMS Response
Section I	Noted.
Section II 1.1	[Bundu to respond]
Section II 1.2	[Bundu to respond]
Section II 1.3	[Bundu to respond]
Section II 1.4	<p>Section 79 (4b) of the MPRDA requires the Applicant 'to submit an environmental management programme (hereafter referred to as EMPR) in terms of section 39 within a period of 120 days from the date of the notice'. Section 39(1) requires 'every person who has applied for a mining right in terms of section 22 must conduct and environmental impact assessment (EIA) and submit an environmental management programme.....'. It is EIMS's understanding that the Applicant is not applying for a Mining Right and therefore the requirement for an EIA in accordance with Section 39(1) does not apply to this application.</p> <p>Activity 8 in GNR386 identifies reconnaissance, prospecting, mining or retention operations as activities (identified in terms of Section 24(2 a and d) of the National Environmental Management Act (Act 107 of 1998)(hereafter referred to as NEMA) which may not commence without environmental authorisation from the competent authority and in respect of which the investigation, assessment and communication of potential impact of activities must follow the procedure as described in regulations 22 to 26 of the EIA regulations (GNR385). With reference to GNR 613 (23 June 2006), item 8 of GNR 386 is specifically excluded from enactment and the notice states that these items will only come into effect at a date to be published in a separate notice. It is EIMS's understanding that such notice has not been issued and therefore that the EIA process and subsequent environmental authorisation defined by the NEMA regulations is not required for the proposed exploration activities.</p> <p>The 'Duty of Care' principle contained within Section 28 of the NEMA states that every person who cause, has caused or may cause significant pollution or degradation of the environment must take reasonable steps to prevent such pollution or degradation from occurring, continuing or reoccurring and where necessary to minimise and rectify such pollution or degradation of the environment. It is our understanding that through the undertaking of the prescribed EMPR the applicant has taken reasonable measures to minimise potential environmental impacts.</p>
Section II 1.5	[Bundu to respond]
Section II 1.6	[Bundu to respond]
Section II 1.7	[Bundu to respond]
Section II 2.1	[Bundu to respond]
Section II 2.2	[Bundu to respond]
Section II 2.3	[Bundu to respond]
Section II 2.4	[Bundu to respond]
Section II 2.5	It is EIMS's understanding that the Applicant believes that there is a potential for viable gas reserves in the study area and as such are in the process of following the prescribed legal requirements. With reference to the Draft EMPR and specifically Section 4.1, the information on

PART 1	
Reference	EIMS Response
	which this section was based was provided by the Applicant. Further the introductory paragraph for section 4 stipulates that ' <i>This section provides an overview of the proposed exploration activity, and is prepared based on information provided by the Applicant</i> '. It is EIMS's understanding that the applicant would not be applying for an exploration right unless they believe that there is a possibility for viable gas reserves to be found.
Section II 2.6	[Bundu to respond]
Section II 2.7	[Bundu to respond]- Section 4 of the EMPR provides a description of the proposed Exploration activity.
Section II 3	The EMPR has noted that the study area contains certain ecological and environmental sensitivities which need to be considered in the decision making process.
Section II 3.1	Point noted. Section 6.10 of the EMPR makes note of portions of the Samara Game Reserve being located within the study area and further notes that this area should 'be defined as sensitive and where possible excluded from the proposed drilling operations and associated disturbances (including access roads). Operations within these areas, if absolutely necessary must be conducted with particular care for the environment and in consultation with landowners'.
Section II 3.2	Point noted. EIMS is unsure under which legislation the Samara Game Reserve has applied for declaration as a 'Private Nature Reserve' and consequently cannot comment fully on the limitations that such declaration may introduce. It is however EIMS's understanding that the Samara Game Reserve has not yet been assigned formal protected area status. Having noted this, EIMS is aware of the sensitivity of this property and the surrounding area's and their value for conservation purposes. Section 6.10 of the EMPR makes note of portions of the Samara Game Reserve being located within the study area and further notes that this area should 'be defined as sensitive and where possible excluded from the proposed drilling operations and associated disturbances (including access roads). Operations within these areas, if absolutely necessary must be conducted with particular care for the environment and in consultation with landowners'
Section II 3.3	EIMS takes note of the listed threatened and protected species or flora and fauna provided by the submission and will include such submission to the relevant authority for review and decision making. With reference to Section 6.9.1.5 and 6.9.3 of the EMPR EIMS makes note that many threatened and endangered floral and faunal species are likely to be found in the study area. Section 8.3.8 of the EMPR notes that the study area contains significant cultural and heritage features which need to be considered. In an effort to mitigate against direct and indirect impacts on these species EIMS has recommended the following: <ul style="list-style-type: none"> ○ "Once prospective drilling sites are identified, an Environmental Assessment Practitioner (EAP) or Ecologist (registered Professional Natural Scientist) undertake a site specific assessment to assess the site for any potential site specific environmental sensitivities prior to commencement. After the assessment the Environmental Management Programme must be amended to include any site specific requirements. The site assessment must include a survey of the preferred footprint area (including access routes) to identify any potential sensitive/ red data species (flora and fauna). In the event of red data species occurring on the footprint the footprint must be relocated to a more suitable position. Alternatively the species must be relocated if possible under the guidance of a suitably qualified professional"; ○ "An approved rehabilitation plan should be in place before drilling activities commence. This plan must be approved by a suitably qualified ecologist (registered with the Council for Natural Scientific Professions-SACNASP)"; and

PART I	
Reference	EIMS Response
	<ul style="list-style-type: none"> o "A heritage specialist should be appointed prior to commencing with the site establishment to identify any potential impacts on heritage features".
Section II 3.4	<p>Comment noted. EIMS has identified) and assessed the impact (Section 8.2 and 8.3 of the EMPR respectively) of the proposed exploration activities on the tourism activities due to the potential visual intrusion of the drilling operations. It is EIMS's understanding that due to the anticipated short duration of the proposed exploration activities that the impact on the existing eco-tourism facilities would not be significant. EIMS has recommended in the EMPR that in order to reduce the cumulative visual impacts of drilling that the first drill hole should be rehabilitated before commencing with the second, and so on. Therefore at any one point in time it is not anticipated that there will be more than one exploration drill site within the 34 000 ha study area.</p>
Section II 3.5	<p>EIMS prepared the EMPR utilising available spatial data, available research, consultation with certain landowners, as well as information obtained from a site visit undertaken by two of EIMS's consultants to the study area.</p> <p>It is EIMS's understanding that there may be a requirement for more than one drill hole/ location within the study area. The number of exploration holes required is likely to be defined by the findings of the preliminary phases of exploration. At this point in time the exact location of the prospective drill sites is not defined. However, EIMS has recommended in the EMPR that the first drill hole should be rehabilitated before commencing with the second, and so on. Therefore at any one point in time it is not anticipated that there will be more than one exploration drill site within the 34 000 ha study area.</p>
Section II 3.6	<p>With reference to Sections 8.2, 8.3.5 and Table 9 of the EMPR the potential impact on the water balance as a result of abstracting water for the drilling operations is identified, assessed and management and mitigation measures proposed.</p> <p>Section 4.5.6 of the EMPR notes that approximately 5000l of water may be required per day. The Applicant has advised EIMS that this represents a worst case scenario and that the process would likely involve the recycling of abstracted water and as such it is not anticipated that this estimated amount would be required. According to the information obtained from a 1: 1000 000 Hydrogeological Map of South Africa the probability of drilling a successful borehole in this area is more than 60%. The groundwater yield potential is classed as moderate on the basis that 60% of the boreholes on recorded produce between 0.5 to 2 l/s.</p>
Section II 3.7	<p>It is EIMS's understanding that the Karoo veld is extremely difficult to rehabilitate, but that rehabilitation is indeed possible. Table 10 of the EMPR includes the recommendation that an approved rehabilitation plan should be in place before drilling activities commence. This plan must be approved by a suitably qualified ecologist (registered with the Council for Natural Scientific Professions).</p>
Section II 3.8	<p>EIMS has identified) and assessed the impact (Section 8.2 and 8.3 of the EMPR respectively) of the proposed exploration activities on the tourism activities due to the potential visual intrusion of the drilling operations. It is EIMS's understanding that due to the anticipated short duration of the proposed exploration activities that the impact on the existing eco-tourism facilities would not be significant. EIMS has recommended in the EMPR that in order to reduce the cumulative visual impacts of drilling that the first drill hole should be rehabilitated before commencing with the second, and so on. Therefore at any one point in time it is not anticipated that there will be more than one</p>

PART 1	
Reference	EIMS Response
	exploration drill site within the 34 000 ha study area.
Section II 3.9	Comment noted. It is EIMS's understanding that the EMPR is adequate.
Section II 3.9.1	Correct. Refer to Section 8.3.1 of the EMPR
Section II 3.9.2	Correct. Refer to Section 8.3.2 of the EMPR
Section II 3.9.3	Correct. Refer to Section 8.3.4 of the EMPR
Section II 3.9.4	Correct. Refer to Sections 8.3.5 and 8.3.6 of the EMPR
Section II 3.9.5	Section 6.10 of the EMPR states that <i>'it is proposed that the Samara Private Game Reserve should be defined as sensitive and where possible excluded from the proposed drilling operations and associated disturbances (including access roads). Operations within these areas, if absolutely necessary must be conducted with particular care for the environment and in consultation with landowners'</i> .
Section II 3.10	With reference to Sections 8 and 9 of the EMPR, an attempt has been made to identify the potential environmental impacts and to assess these. In addition management and mitigation measures have been recommended to help reduce the significance of any negative impacts and enhance any positive impacts.
Section II 3.11	Please refer to response given to item 'Section II 1.4' of this document. It is EIMS's understanding that there is no current statutory obligation on the applicant to perform a full EIA.
Section II 4	Comment noted.
Section II 4.1	<p>Comment noted. The Subtropical Thicket Rehabilitation Project identifies that there are opportunities for rehabilitation of degraded land and in addition may offer the benefit of carbon sequestration. According to the Subtropical Thicket Ecosystem Programme information much of the study area is already defined as impacted¹ (refer to Figure 12 of the EMPR) and as such would benefit from any future rehabilitation and restoration. As a result of this and the submission made by Samara, the EMPR has been amended to include the following recommendations for rehabilitation:</p> <ul style="list-style-type: none"> o An approved rehabilitation plan should be in place before drilling activities commence. This plan must be approved by a suitably qualified ecologist (registered with the Council for Natural Scientific Professions-SACNASP). This rehabilitation plan should be submitted to the Subtropical Thicket Rehabilitation Project for comment prior to finalisation and should consider the following: <ul style="list-style-type: none"> o Potential use of <i>Portulacaria afra</i> (spekboom) truncheons (with certain plants infected with <i>Viscum crassulae</i>), and larger plant specimens (e.g. Aloe's, Euphorbia's, etc); and o Prevention of damage due to stock (grazing and herbivory) until established.
Section II 4.2	Comment noted.
Section II 4.3	Comment noted.

¹ These are areas where human activities or alien plant invasion have degraded the natural environment severely, and as such should where possible be rehabilitated/ restored or if this is not possible would be suitable for development over other un-impacted areas.

PART 1	
Reference	EIMS Response
Section II 5	Comment noted.
Section II 5.1	Comment noted. It is important to note that according to the available demographic information, unemployment in the Blue Crane Municipality is approximately 65%- unemployed and not economically active (refer to Section 6.13 of the EMPR). In addition it was mentioned at the public meeting held in Pearston that the unemployment figure locally was approximately 85%. It is therefore expected that the provision of any addition employment would contribute significantly to the local communities.
Section II 6	EIMS has identified) and assessed the impact (Section 8.2 and 8.3 of the EMPR respectively) of the proposed exploration activities on the tourism activities due to the potential visual intrusion of the drilling operations. It is EIMS's understanding that due to the anticipated short duration of the proposed exploration activities that the impact on the existing eco-tourism facilities would not be significant. EIMS has recommended in the EMPR that in order to reduce the cumulative visual impacts of drilling that the first drill hole should be rehabilitated before commencing with the second, and so on. Therefore at any one point in time it is not anticipated that there will be more than one exploration drill site within the 34 000 ha study area.
Section III	Comment noted. It is EIMS's understanding that according to the current legislative requirements that a full environmental impact assessment in accordance with the NEMA is not required for this activity (please refer to detailed response to section II 1.4 of this response).
Section III 1	[Bundu to respond]
Section III 2	[Bundu to respond]
Section III 3	It is EIMS's understanding that notes of the discussions held at the public meeting were prepared and distributed to all attendees by Bundu.
Section III 4	[Bundu to respond].

PART 2	
Reference	EIMS Response
Section I 1-4	Comment noted. Please refer to Section 6.9.1 of the EMPR which provides a description of the floral context of the study area based on the latest available vegetation classification (Mucina; 2006 ²). The vegetation classification provided by Mr Light refers to the 'Vegetation of South Africa, Lesotho and Swaziland published in 1998 (Low and Rebelo; 1998). The information provided in the EMPR is more recent and representative. The conservation status of these areas have been described in the EMPR.
Section I 5	<p>Comment noted. The species list provided will be included in the submission to the PASA. Section 6.9.1.5 of the EMPR provides a list of red data floral species likely to occur in the study area. <i>Boscia oleoides</i> and Spekboom (<i>Portulacaria afra</i>) are not (as far as EIMS is aware) listed as threatened species according to the South African National Biodiversity Institute (SANBI). <i>Boscia oleoides</i> and Spekboom are listed by SANBI as Least Concern³.</p> <p>The Subtropical Thicket Rehabilitation Project identifies that there are opportunities for rehabilitation of degraded land and in addition may offer the benefit of carbon sequestration. According to the Subtropical Thicket Ecosystem Programme information much of the study area is already defined as impacted⁴ (refer to Figure 12 of the EMPR) and as such would benefit from any future rehabilitation and restoration. As a result of this and the submission made by Samara, the EMPR has been amended to include the following recommendations for rehabilitation:</p> <ul style="list-style-type: none"> o An approved rehabilitation plan should be in place before drilling activities commence. This plan must be approved by a suitably qualified ecologist (registered with the Council for Natural Scientific Professions-SACNASP). This rehabilitation plan should be submitted to the Subtropical Thicket Rehabilitation Project for comment prior to finalisation and should consider the following: <ul style="list-style-type: none"> o Potential use of <i>Portulacaria afra</i> (spekboom) truncheons (with certain plants infected with <i>Viscum crassulae</i>), and larger plant specimens (e.g. Aloe's, Euphorbia's, etc); and o Prevention of damage due to stock (grazing and herbivory) until established.
Section I 6	Comment noted. EIMS have reviewed the report by Dr Martin and comments and responses are provided in Part 4 of this response. With reference to Section 6.9 of the EMPR the vegetation units encountered in the study area are all designated as having a 'least threatened' ⁵ conservation status.
Section I 6.1	Comment noted. The Eastern Cape Biodiversity Conservation Plan (ECBCP) does not include mining as one of the permissible or conditional land-uses within the proposed study area. In addition the ECBCP requires that the natural biodiversity is retained in as natural a state as possible. The EMPR identifies the ecological sensitivities and makes recommendations to reduce and mitigate the impact of the proposed

² Mucina, L. & Rutherford, M.C. (eds) 2006. The vegetation of South Africa, Lesotho and Swaziland. Strelitzia 19. South African National Biodiversity Institute, Pretoria.

³ A taxon is Least Concern when it has been evaluated against the five IUCN criteria and does not qualify for the categories Critically Endangered, Endangered, Vulnerable and Near Threatened, or the South African categories Critically Rare, Rare or Declining. Widespread and abundant taxa are typically listed in this category.

⁴ These are areas where human activities or alien plant invasion have degraded the natural environment severely, and as such should where possible be rehabilitated/ restored or if this is not possible would be suitable for development over other un-impacted areas.

⁵ Ecosystems in which more than 80% of the original area of natural habitat is still intact are classified as least threatened (National Spatial Biodiversity Plan; 2004).

PART 2	
Reference	EIMS Response
	<p>exploration activities.</p> <p>According to the Subtropical Thicket Ecosystem Programme information much of the study area is already defined as impacted⁶ (refer to Figure 12 of the EMPR) and as such would benefit from any future rehabilitation and restoration. As a result of this and the submission made by Samara, the EMPR has been amended to include the following recommendations for rehabilitation:</p> <ul style="list-style-type: none"> ○ An approved rehabilitation plan should be in place before drilling activities commence. This plan must be approved by a suitably qualified ecologist (registered with the Council for Natural Scientific Professions-SACNASP). This rehabilitation plan should be submitted to the Subtropical Thicket Rehabilitation Project for comment prior to finalisation and should consider the following: <ul style="list-style-type: none"> ○ Potential use of <i>Portulacaria afra</i> (spekboom) truncheons (with certain plants infected with <i>Viscum crassulae</i>), and larger plant specimens (e.g. Aloe's, Euphorbia's, etc); and ○ Prevention of damage due to stock (grazing and herbivory) until established.
Section II 1	<p>Comment noted. The species lists provided will be included in the submission to the PASA. Please refer to Sections 6.9.1.5. and 6.3 of the EMPR for details on the flora and fauna within the study area. Section 8.3.6 and Table 9 of the EMPR identifies and assesses the likely impact that the activity may have on the ecology and where possible makes recommendations to avoid and mitigate the likely impacts on sensitive species. Section 9.1.2 of the EMP makes the following recommendation: "<i>Once prospective drilling sites are identified, an Environmental Assessment Practitioner (EAP) or Ecologist (registered Professional Natural Scientist) undertake a site specific assessment to assess the site for any potential site specific environmental sensitivities prior to commencement. After the assessment the Environmental Management Programme must be amended to include any site specific requirements. The site assessment must include a survey of the preferred footprint area (including access routes) to identify any potential sensitive/ red data species (flora and fauna). In the event of red data species occurring on the footprint the footprint must be relocated to a more suitable position. Alternatively the species must be relocated if possible under the guidance of a suitably qualified professional.</i>"</p>
Section II 2	<p>Comment noted. It is not anticipated that the proposed Exploration activities will significantly affect the conservation activities being undertaken by Samara.</p>
Section III 1	<p>Comment noted. With reference to Section 6.11; 8.3.8; and Table 9 of the EMPR the sensitivity of the area in relation to the potential for cultural and heritage features has been identified and mitigation measures recommended to reduce the significance of this potential impact. The EMPR recommends that a heritage specialist should be appointed prior to commencing with the site establishment to identify any</p>

⁶ These are areas where human activities or alien plant invasion have degraded the natural environment severely, and as such should where possible be rehabilitated/ restored or if this is not possible would be suitable for development over other un-impacted areas.

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PART 2	
Reference	EMS Response
	potential impacts on heritage features.
Section III 2	Comment noted.
Section III 3	Comment noted.
PART 3	
Mr Light's submission provides a list of prominent trees and tall shrubs. This list will be included in the submission to PASA.	

PART 4	
Reference	EIMS Response
Section: Environment 1	<p>Section 6.9 and 6.10 of the EMPR provides a description of the receiving environment based on available data, including the National Spatial Biodiversity Assessment Report and the Sub-tropical Ecosystem Project (STEP) and the latest vegetation mapping of South Africa (Mucina & Rutherford; 2006). Mucina & Rutherford identifies that all of the vegetation units within the study area are least threatened. It is however prudent to consider the other available resources.</p> <p>Section 6.10 of the EMPR specifically investigates the information available from the STEP. Based on the STEP information available to EIMS and the information obtained from the STEP database, the majority of the study area can be classified as a STEP corridor, with an indication of impacted areas. Areas classified as endangered (according to STEP Conservation status) occur within the south-western and south-eastern regions of the proposed study area. These endangered areas have been severely impacted on by development or unsustainable land uses and therefore the ecological functions within these areas are under threat. According to the STEP priority classification the following applies to each of the areas designated within the study area:</p> <ul style="list-style-type: none"> • STEP Corridor: parts of the landscape that are best able to allow the continuation of large-scale ecological processes (especially the movement of plants and animals) if such areas are restricted to low-impact activities. • Impacted Areas: These are areas where human activities or alien plant invasion have degraded the natural environment severely, and as such should where possible be rehabilitated/ restored or if this is not possible would be suitable for development over other un-impacted areas. • Endangered Areas: These ecosystems can withstand only very minimal loss of natural area through disturbance or development. <p>It is understood that the exploration activities will result in a small extent of disturbance over a relatively short time period. In addition the recommendations of the EMPR include rehabilitation of the disturbed areas which will align with the STEP recommendations for 'Impacted Areas'.</p>
Section: Environment 2	<p>Comment noted. With reference to Section 6.9 and 6.10 of the EMPR the sensitivity of the vegetation units is identified. The STEP information identifies much of the study area as being endangered and therefore can only withstand minimal loss of natural area. It is understood that the exploration activities will result in a small extent of disturbance over a relatively short time period. In addition the recommendations of the EMPR include rehabilitation of the disturbed areas.</p>
Section: Environment 3	<p>Comment noted. The Eastern Cape Biodiversity Conservation Plan (ECBCP) identifies that the majority of the study area is designated with a Biodiversity Land Management Class (BLMC) of 2 and a small area (the area which incorporates Samara) as BLMC 1. These have a recommended land use of Conservation (for BLMC1) and Game Farming, communal livestock and commercial livestock (BLMC2).</p> <p>The BLMC's provide "guidelines for regulating land-use change so as to avoid or minimize biodiversity impacts in critical biodiversity areas (CBAs). These maps and guidelines should be referred to in all EIAs (and related environmental studies) and should be consulted in the decision-making process for all land-use authorisations" (ECBCP; 2007).</p>

PART 4	
Reference	EIMS Response
	EIMS has revised the EMPR to include the information available from the ECBCP.
Section: Environment 4	Comment noted. It is not anticipated that the proposed exploration activities will significantly impact on the recommended eco-tourism plans for the region. The exploration activities will result in a small extent of disturbance over a relatively short time period. In addition the recommendations of the EMPR include rehabilitation of the disturbed areas.
Section: Environment 5	Comment noted.
Section: Environment 6	<p>Comment noted. The Subtropical Thicket Rehabilitation Project identifies that there are opportunities for rehabilitation of degraded land and in addition may offer the benefit of carbon sequestration. According to the Subtropical Thicket Ecosystem Programme information much of the study area is already defined as impacted⁷ (refer to Figure 12 of the EMPR) and as such would benefit from any future rehabilitation and restoration. As a result of this and the submission made by Samara, the EMPR has been amended to include the following recommendations for rehabilitation:</p> <ul style="list-style-type: none"> o An approved rehabilitation plan should be in place before drilling activities commence. This plan must be approved by a suitably qualified ecologist (registered with the Council for Natural Scientific Professions-SACNASP). This rehabilitation plan should be submitted to the Subtropical Thicket Rehabilitation Project for comment prior to finalisation and should consider the following: <ul style="list-style-type: none"> o Potential use of <i>Portulacaria afra</i> (spekboom) truncheons (with certain plants infected with <i>Viscum crassulae</i>), and larger plant specimens (e.g. Aloe's, Euphorbia's, etc); and o Prevention of damage due to stock (grazing and herbivory) until established.
Section: Economy 1	EIMS has identified and assessed the impact (Section 8.2 and 8.3 of the EMPR respectively) of the proposed exploration activities on the tourism activities due to the potential visual intrusion of the drilling operations. It is EIMS's understanding that due to the anticipated short duration of the proposed exploration activities that the impact on the existing eco-tourism facilities would not be significant. EIMS has recommended in the EMPR that in order to reduce the cumulative visual impacts of drilling that the first drill hole should be rehabilitated before commencing with the second, and so on. Therefore at any one point in time it is not anticipated that there will be more than one exploration drill site within the 34 000 ha study area.
Section: Economy 2	The R63 passes through the proposed study area. EIMS has identified and assessed the impact (Section 8.2 and 8.3 of the EMPR respectively) of the proposed exploration activities on the tourism activities due to the potential visual intrusion of the drilling operations. It is EIMS's understanding that due to the anticipated short duration of the proposed exploration activities that the impact on the existing eco-tourism facilities would not be significant. EIMS has recommended in the EMPR that in order to reduce the cumulative visual impacts of drilling that the first drill hole should be rehabilitated before commencing with the second, and so on. Therefore at any one point in time it is

⁷ These are areas where human activities or alien plant invasion have degraded the natural environment severely, and as such should where possible be rehabilitated/ restored or if this is not possible would be suitable for development over other un-impacted areas.

PART 4	
Reference	EIMS Response
	not anticipated that there will be more than one exploration drill site within the 34 000 ha study area.
Section: Economy 3	Comment noted. It is not anticipated that the proposed exploration activities will the utilisation of the study area for game based eco-tourism.
Section: Economy 4	<p>Comment noted. The Subtropical Thicket Rehabilitation Project identifies that there are opportunities for rehabilitation of degraded land and in addition may offer the benefit of carbon sequestration. According to the Subtropical Thicket Ecosystem Programme information much of the study area is already defined as impacted⁸ (refer to Figure 12 of the EMPR) and as such would benefit from any future rehabilitation and restoration. As a result of this and the submission made by Samara, the EMPR has been amended to include the following recommendations for rehabilitation:</p> <ul style="list-style-type: none"> ○ An approved rehabilitation plan should be in place before drilling activities commence. This plan must be approved by a suitably qualified ecologist (registered with the Council for Natural Scientific Professions-SACNASP). This rehabilitation plan should be submitted to the Subtropical Thicket Rehabilitation Project for comment prior to finalisation and should consider the following: <ul style="list-style-type: none"> ○ Potential use of <i>Portulacaria afra</i> (spekboom) truncheons (with certain plants infected with <i>Viscum crassulae</i>), and larger plant specimens (e.g. Aloe's, Euphorbia's, etc); and ○ Prevention of damage due to stock (grazing and herbivory) until established.
Section: Economy 5	Comment noted. It is not anticipated that the proposed exploration activities will the utilisation of the study area for game based eco-tourism.
Section: Social 1	Comment noted.
Section: Social 2	Comment noted. The EMPR recommends that the rehabilitation plan is compiled on consultation with the Subtropical Thicket Restoration Project. The EMPR has also been revised to include a recommendation that the implementation of the Rehabilitation plan should utilise local labour where possible. This will assist in building capacity for this worthy project.
Section: Social 3	Comment noted.
PART 5	
This submission includes an overview of the Samara Private Game Reserve in the context of the receiving environment. In addition the document provides a list of faunal species occurring on the reserve. This document will be included in the submission to PASA. Section 5.9 of the EMPR provides an overview of the receiving environment including Samara.	

⁸ These are areas where human activities or alien plant invasion have degraded the natural environment severely, and as such should where possible be rehabilitated/ restored or if this is not possible would be suitable for development over other un-impacted areas.

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PART 6	
Reference	EIMS Response
Section A	[Bundu to respond]
Section B	[Bundu to respond]
Section C 1-13	[Bundu to respond]
Section C 14	Depending on the methods of Seismic surveying there may be various environmental impacts. With reference to Section 4.4 of the EMPR, the exploration activities will utilise existing available seismic data and the applicant will not be undertaking additional seismic surveying.
Section C 15	According to the information obtained from a 1: 1000 000 Hydrogeological Map of South Africa the probability of drilling a successful borehole in this area is more than 60%. The groundwater yield potential is classed as moderate on the basis that 60% of the boreholes on recorded produce between 0.5 to 2 l/s.
Section C 16-29	[Bundu to respond]
Section D 1-29	[Bundu to respond]
Section D 30	The EMPR does not make a recommendation that an environmental impact study is performed on the identified area. Other recommendations are made prior to establishing the drill sites are described in the Pre-establishment Phase of Table 10 of the EMPR.
Section D 31.1	Section 6.7 and 6.8 of the EMPR provides baseline information on the ground and surface water resources.
Section D 31.2	Section 6.9 of the EMPR provides information on the likely occurrence of red data flora and fauna. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive species.
Section D 31.3	Section 6.9 of the EMPR provides information on the likely occurrence of red data flora and fauna. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive species.
Section D 31.4	Section 6.9 of the EMPR provides information on the likely occurrence of red data flora and fauna. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive species.
Section D 31.5	Section 6.11 of the EMPR provides information on the likely occurrence of cultural and historical features. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive features.
Section D 32-33	[Bundu to respond]
Section D 34	Activity 8 in GNR386 identifies reconnaissance, prospecting, mining or retention operations as activities (identified in terms of Section 24(2 a and d) of the National Environmental Management Act (Act 107 of 1998)(hereafter referred to as NEMA) which may not commence without environmental authorisation from the competent authority and in respect of which the investigation, assessment and communication of potential impact of activities must follow the procedure as described in regulations 22 to 26 of the EIA regulations (GNR385). With reference to GNR 613 (23 June 2006), item 8 of GNR 386 is specifically excluded from enactment and the notice states that these items will only come into effect at a date to be published in a separate notice. It is EIMS's understanding that such notice has not been issued and therefore that the EIA process and subsequent environmental authorisation defined by the NEMA regulations is not required for the proposed exploration activities.
Section D 35	Section 6.9 of the EMPR provides information on the likely occurrence of red data flora and fauna. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive species.
Section D 35.1	EIMS is unaware of a floral species, <i>Polychepahela euphorbis</i> . However, the information provided by the South African National Biodiversity

	Institute (SANBI) notes that a <i>Euphorbia polycephala</i> plant, which is recorded as being vulnerable, may occur within the study area (this information is provided in Section 6.9.1.5 of the EMPR). Section 6.9 of the EMPR provides information on the likely occurrence of red data flora and fauna. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive species.
Section D 35.2	Section 6.9 of the EMPR provides information on the likely occurrence of red data flora and fauna. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive species.
Section D 35.3	Section 6.9 of the EMPR provides information on the likely occurrence of red data flora and fauna. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive species. The EMPR has been amended to include a suggestion that the Endangered Wildlife Trusts' South African Crane Working Group is consulted in the pre-establishment phase.
Section D 35.4	Section 6.9 of the EMPR provides information on the likely occurrence of red data flora and fauna. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive species.
Section D 35.5	Section 6.11 of the EMPR provides information on the likely occurrence of cultural and historical features. Recommendations are made in the EMPR to prevent and reduce the potential negative impacts on sensitive features.
Section D 36	A specialist Socio-economic study has not been undertaken. EIMS has identified and assessed the impact (Section 8.2 and 8.3 of the EMPR respectively) of the proposed exploration activities on the tourism activities due to the potential visual intrusion of the drilling operations. It is EIMS's understanding that due to the anticipated short duration of the proposed exploration activities that the impact on the existing eco-tourism facilities would not be significant. EIMS has recommended in the EMPR that in order to reduce the cumulative visual impacts of drilling that the first drill hole should be rehabilitated before commencing with the second, and so on. Therefore at any one point in time it is not anticipated that there will be more than one exploration drill site within the 34 000 ha study area.
Section E	[Bundu to respond]

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Director: Teboho. Nkhahle

DEREK LIGHT

P O Box 431
26 Church Square
GRAAFF-REINET
6280

Attorneys & Conveyancers

e-mail: dlight@intekom.co.za
Telephone: (049) 89-1018316
Facsimile: (049) 89-22617

Our Ref: Mr Derek Light/ps/W161
Your Ref: Peter D Price

20 May 2009

Environmental Impact Management Services (EIMS)
P O Box 2083
PINEGOWRIE
2123

By Hand
(to be handed to EIMS at the
public participation meeting in
Pearston on 21 May 2009)

Dear Sirs

APPLICATION FOR EXPLORATION RIGHTS :
BUNDU GAS & OIL EXPLORATION (PTY) LTD ("BUNDU GAS")

This letter is addressed to you in anticipation of the fact that we may not be allowed adequate opportunity to express our client's concerns and to have their questions put, properly understood and adequately answered at the public meeting convened for 21 May 2009.

We shall therefore deal with the areas of concern and the questions our clients have in this letter, which we expect will receive your proper attention and formal response prior to you finalising and submitting to Petroleum Agency of SA (the designated agency under the MPRDA) the EMPR..

I. OUR CLIENT:

Our clients are **interested and affected** parties who will be negatively affected by the application by Bundu Gas and the intended exploration activities. In particular, we represent the following parties, namely:

1. The **landowner** of the area known as Samara, Woolhead Holdings Limited (company registration number 1997/009412/10);

2. Samara Private Game Reserve (Proprietary) Limited (company registration number 2005/020505/07), the **lawful occupant** of the aforesaid land in terms of a lease agreement with the landowner.

II. Our clients have a number of concerns, some of which have been dealt with in earlier correspondence and which may be summarised as follows:

1. **The Process** that has been followed in fundamentally flawed and administratively unfair and prejudicial to our client and other interested and affected parties in that:

- 1.1 The applicant and the Agency have failed to comply with the provisions of Section 79(4) read with Section 6 of MPRDA and the process has not been dealt with in accordance with the principles of lawfulness, reasonableness and procedural fairness as provided for in the Promotion of Administrative Justice Act, Act 3 of 2000 (Sections 3 and 4 thereof).

- 1.2 The applicant and the Agency have refused our clients access to copies of the application and supporting documentation and further information relevant to the application, notwithstanding proper demand therefor in terms of the Promotion of Access to Information Act, Act 2 of 2000.

- 1.3 The application fails to furnish details of how Bundu Gas will substantially and meaningfully expand opportunities for historically disadvantaged persons and the identity of Bundu Gas's BEE partners, if any, containing only vague suggestions that Bundu Gas continues to negotiate this aspect with unidentified persons.

- 1.4 The application and Agency's notice in terms of Section 79(4) provides for the furnishing of an environmental management programme (EMPR) under circumstances where the principles contained in and the provisions of the National Environmental Management Act (NEMA) and Regulations must prevail and requires that an Environmental Impact Assessment (EIA) be performed. The exploration activity is an activity identified in terms of Section 24(2)(d) of NEMA and expressly included in the schedule to Regulation 386 dated 21 April 2006 in item 8 thereof. The Agency should have required that an EIA be performed and the applicant has a duty of care in terms of NEMA

to perform and supply same. An EMPR is not sufficient compliance with the environmental legislation.

- 1.5 Inadequate information on the financial position of the applicant and its shareholders has been provided to enable the Agency and / or interested and affected parties to assess the affordability to the applicant of the proposed activities.
 - 1.6 It appears from the notice to affected persons dated 7 March 2009 that the period for the proposed exploration activities may exceed the period of three years provided for in Section 80(5) of the MPRDA.
 - 1.7 Whilst the Agency has been tasked with the administration of the application in accordance with Section 70 of the MPRDA, it has taken the stance that its involvement in this application is "advisory only", which is in conflict with its statutory duty.
2. **The merits** of the application are at the very least, questionable, more particularly in that:
- 2.1 Regard being had to the objective public geological sources of information, there is nothing to indicate why the potential for exploitable oil and gas in the defined area should be greater than anywhere else along the base of the escarpment in the Karoo;
 - 2.2 The Bokkeveld Group in the Cape Supergroup is a potential source rock for oil / gas and the place where it wedges out below the Karoo Supergroup is potentially a trap or reservoir for oil / gas migrating from the source rock and was targeted in the 1960's by the Southern Oil Exploration Corporation (Pty) Ltd (Soekor), who drilled three boreholes in the Graaff-Reinet area, finding nothing of any economic significance.
 - 2.3 The Cranemere borehole CR1/68 struck an uneconomic, low-volume methane accumulation in the Ecca Shales of the Karoo Supergroup. The gas in the Cranemere hole was held in secondary fractures with low porosity. The Soekor report confirms that no primary porosity was found and that "the few gas-bearing joint zones intersected were of too small a volume to be economically significant".

- 2.4 The Soekor report on the said well concludes that "Cranemere's well can thus be classed as a dry hole with a gas show".
- 2.5 It is apparent from the draft EMPR prepared by you that the applicant intends to re-investigate the possibility of the commercial value of the presence of gas detected by Soekor in the aforesaid exploration, stating in its report that "a strong presence of gas has been uncovered at a depth of approximately 2 600 metres". This clearly has reference to the Cranemere well CR1/68 and is misleading. There was not "a strong presence of gas". The volumes found by Soekor were "too small a volume to be economically significant".
- 2.6 The applicant has failed to disclose any geological information to enable affected parties to assess the merits of their intended activities. By way of example, the applicant has failed to indicate what it believes the source and reservoir rocks would be. It is therefore assumed that the applicant is targeting the same sources as targeted by Soekor in the 1960's, being the Bokkeveld Group, which wedges out below the Dwyka Group north of the said Cranemere hole. Should that be the position, drilling north of Cranemere on our client's land would be of little use.
- 2.7 Whilst no particularity has been furnished by the applicant which is of any use to determine what exploration methods the applicant will employ, even if it is assumed that exploration methods have made some strides since the 1960's, it is unlikely on the objective and thoroughly researched geological information that oil or gas in meaningful quantities will be found.
3. **The targeted area** is an **ecologically sensitive** area and there are a number of environmental issues which to date, would appear to have been ignored by the applicant and which militate against the granting of exploration rights.
- 3.1 The land owned and occupied by Woolhead and Samara is approximately 27,000 hectares in extent and is currently utilised as a private nature reserve primarily aimed at the preservation and protection of indigenous and threatened fauna and flora rendered sustainable by its commercial exploitation of the property in the Eco-tourist industry;

- 3.2 Our clients have applied to the Minister of Environmental Affairs to have the land declared a private nature reserve and are engaged in discussion with Sanparks to have same incorporated into the National Parks Programme;
- 3.3 In addition to the significant number of threatened and protected species of fauna and flora **listed in the annexures** to this communication, significant indigenous rock art ("bushmen paintings") and a fossil base centuries old occur on the land, all of which the landowners and lawful occupants and the State have a duty to preserve;
- 3.4 The Eco-tourist industry is well established in the area and Samara has made a significant contribution towards attracting tourists, not only to its own land, but to the area as a whole and the intended exploration and subsequent mining activities on the land and in the area will destroy the tourist industry in the area and occasion economic hardship to those employed in this industry;
- 3.5 In the draft EMPR, without having thoroughly investigated the matter and visited the affected area, you conclude and recommend that the "Samara" area, rivers and wetland areas and topographic areas with a high erosion potential be defined as sensitive and "where possible excluded from the proposed drilling operations and associated disturbances (including access roads)". Whilst it is apparent from the summary provided by the applicant dealing with the drilling operations in phase 3, that a single hole will be drilled, it is also apparent from the summary of phase 4 that the drilling of further holes is not excluded, whilst no indication is given as to the targeted area of such further drilling;
- 3.6 The Karoo and in particular, the targeted area, is in a low rainfall area, reliant on underground water reserves which are limited in their volumes, utilised primarily for the watering of stock and game and to a lesser extent, for household purposes. The volumes of water required by the applicant in its exploration and later activities will significantly impact on this limited resource;
- 3.7 The nature of Karoo veld in its various categories cannot be rehabilitated and consequently the landscape will be permanently scarred by any exploration or mining activities. To suggest that the area could be rehabilitated by, *inter alia*, replacing topsoil to be re-vegetated using a mixture of annual and perennial grass species, does not rehabilitate the land in the true sense;

- 3.8 Even if the intended drilling and mining activities ultimately do not occur on the Samara land, the vistas which form an integral part of the ambience important to the eco-tourist industry will be disturbed by the erection of drilling and other structures on adjoining land, by way of example, Cranemere farm;
- 3.9 In an initial application to the Agency (and therefore the Minister), the applicant indicates that the "proposed exploration operations will have **little or no effect on the environment and other users of the area**". This is not so. Even in the inadequate draft EMPR prepared by you, it is apparent that:
- 3.9.1 The activities will have a medium negative impact on the topography;
 - 3.9.2 It will also have a low negative impact on soil;
 - 3.9.3 It would have an impact on the land use and capability;
 - 3.9.4 It would have a medium negative significance on surface and ground water and the ecology;
 - 3.9.5 The report also identifies certain areas including the Samara Game Reserve, that are sensitive, recommending that no exploration activities are undertaken within these areas of sensitivity.
- 3.10 Whilst the exploration activity may be for a limited period only and ultimately (and very probably) revealing that there is no gas or oil in commercially viable quantities, the impact the intended exploration activities will have on the land and current land use, could well be permanent with significant socio-economic and other negative consequences.
- 3.11 At the very least, the statutory obligation to perform a full EIA as opposed to an EMPR should be undertaken to properly assess the environmental impact of what is intended by the applicant.
4. **In terms of the Eastern Cape Bio-diversity Conservation Plan** for each bio-diversity land management class, the landowner and more particularly the lawful occupant of the land is complying with the recommended land use objectives, by utilising the land for eco-tourism coupled with added thicket restoration projects, the conservation and restoration of vulnerable eco-systems in the areas identified to be managed for conservation and for no bio-diversity loss / minimal loss of eco-system integrity and no transformation of natural habitat.

- 4.1 Samara has partnered with the sub-tropical thicket restoration project aimed at re-establishment of Spekboom, one of the best plants for carbon-sequestration in the world, aimed at protecting the Spekboom thicket, one of the most threatened vegetation types in the Eastern Cape and with the view to contributing to the transformation of the rural economy in the Eastern Cape through the employment of local labour and an annual return in the form of carbon credits.
- 4.2 It has been established that utilising the land for eco-tourism with a conservation ethic, has the potential of turning unsustainable farming land into economically productive land, producing more jobs, restoring degraded land so that it becomes more productive and preserves threatened bio-diversity, which is a national conservation priority.
- 4.3 It has been established by Langholz & Kerley (2006) that the land use, based on eco-tourism has resulted in:
 - a. A 4.5-fold increase in the number of employees;
 - b. A 32-fold increase in the wage bill;
 - c. A 4.8-fold increase in the average salary of each employee.
5. **The significance** of the affected land in the promotion of the eco-tourist industry, the creation of employment and the protection of the environment is significant.
 - 5.1 Samara has created 80 direct employment opportunities (each direct job in the tourism industry creates 2.2 jobs in the tourism economy) and consequently Samara supports approximately 176 local employment opportunities in the tourism economy.
6. **The negative impact** the exploration and related activities will have on the area will not be limited to the direct impact on that portion of the land in which the activities are pursued, but will detract from the unspoilt plains of the Camdeboo and the view thereof from the plateau, which is an important eco-tourist attraction of Samara and the surrounding area. If the effect thereof is to reduce, even marginally, the visitors to the area, it could materially undermine the eco-tourism activities at Samara and surrounds.

III. As a consequence of the applicant's failure to make information and documentation available and, coupled with its failure to follow a transparent administrative procedure and to conduct a thorough environmental impact assessment, a number of issues remain unclear, giving rise to questions which require attention and answer. We include as an annexure hereto, a list of questions which we require answers to. The annexures to this letter should be read as being specifically incorporated herein.

We await your confirmation that you will consider the comments made herein responsibly and that Bundu Gas will reconsider pursuing the application in its current form or at all. You are also requested to:

1. Furnish us with a written response to the comment and inputs contained herein;
2. Furnish us with a written response to the questions put herein;
3. Furnish us with a copy of the minutes of this meeting when these have been prepared; and
4. Furnish us with a copy of the report of this meeting (which we understand will inform the finalisation of the EMPR) and related procedures which you intend submitting to the Agency and the Minister.

We would also appreciate it if you would furnish us with a time frame within which we can expect a response.

In the interim, we record that **our client objects to the granting of an exploration right** to the applicant and will convey their objections to the Agency and the Minister.

We await your response.

Yours faithfully

DEREK LIGHT

cc Bundu Gas and Oil Exploration (Pty) Ltd
Petroleum Agency SA
Minister of Minerals

ANNEXURE IN RE. ENVIRONMENTAL CONSIDERATIONS

I. THE VEGETATION

The Samara Private Nature Reserve is conducted in an area of approximately 27,000 hectares, which houses four of South Africa's threatened vegetation biomes, more particularly:

1. Mountain Grassland Biome (threatened);
2. Nama Karoo Biome;
3. Thicket / Valley Bushveld Biome (protected bio-diversity hotspot);
4. Savanna

The ecology of the area is sensitive and requires careful management for proper conservation and the bio-diversity in the area is substantial.

5. Prominent trees and tall shrubs which occur on the property are described in annexure "A" hereto and include *Boscia Oleoides* (Shepherd's Tree) over 700 years old and a number of threatened species, including Spekboom Thicket, which is some of the most threatened vegetation types in the Eastern Cape and which is the subject of a sub-tropical thicket restoration project on the property, which will facilitate the planting of Spekboom.
6. Attached hereto marked "B" is a report by Dr Paul Martin, dealing with the importance of conservation and preservation of the threatened vegetation types occurring on the property, highlighting important environmental issues, including socio-economic issues.
 - 6.1 It will appear from the said report that the current land use is a lawful recommended land use and that mining and related activities is not contemplated as a desirable land use in the area.

II. FAUNA OCCURRING ON THE PROPERTY

1. Annexed hereto marked "C" is a summary and report on the bio-diversity and the preservation thereof and also details of the wildlife occurring on the property, mammals, insects, shrews, primates, rabbits and hares, rodents, carnivores, various categories of antelope, birds, reptiles, lizards, tortoises, frogs and toads. These include threatened species like Cheetah, Brown Hyena, Leopard, Cape Mountain Zebra, White Rhinoceros and the national and protected bird, Blue Crane.
2. The current land use is aimed at protection of the fauna and flora and particularly threatened species, with programmes for the reintroduction and breeding of threatened species like Cheetah, White Rhinoceros, Brown Hyena and the planting of Spekboom and generally, for the conservation of all indigenous fauna and flora.

III. HERITAGE SITES

1. The property is situated in an area that houses significant fossils dating back in excess of 250 million years and Khoi San rock paintings ("Bushmen paintings") are to be found on site, none of which can be allowed to be threatened by irresponsible land use and which must be conserved by landowners and organs of State.
2. Woolhead Holdings Ltd and Samara Private Game Reserve (Pty) Ltd have owned and occupied land from about 1997 (land acquired during the period 1997 – 2001) and has developed the property into a nature reserve with a commercial eco-tourist aspect at substantial cost, the reserve being listed in the Conde Naste traveller list of 60 best hotels in the world and in the travel and leisure magazine's top 50 romantic destinations in the world.
3. The land involved has contributed and continues to contribute to the well-established eco-tourist industry in the area and province and indeed, in the country.

B''

WHY GAS MINING IS NOT THE BEST SUSTAINABLE LAND USE IN THE SAMARA / GRAAFF-REINET REGION

Notes by:

Dr Paul Martin

P O Box 61029

Bluewater Bay 6212

Port Elizabeth

Tel: 041 4665698

Cell: 0732524111

Email: pmartin@axxess.co.za

In his capacity as:

1. Environmental Specialist for the consultants responsible for the Development Bank of SA funded:
 - a. Camdeboo Local Municipality Responsible Tourism Sector Plan Review (KBP 2009)
 - b. Blue Crane Route Municipality Responsible Tourism Sector Plan (Urban-Econ 2009)
 - c. Cacadu District Municipality Tourism Master Plan (KBP 2009)
2. SA Citizen concerned about the conservation and restoration of critical Eastern Cape ecosystems and the creation of sustainable rural livelihoods.

ENVIRONMENT

1. The Sub-Tropical Ecosystem Project (STEP) (Pierce 2006; Pierce & Mader 2006) identified arid Albany Thicket vegetation types, especially the different types of Spekboom Thicket as some of the most threatened vegetation types in the Eastern Cape due to unsustainable goat pastoralism.
2. The Eastern Cape Biodiversity Conservation Plan (ECBCP 2007) identified arid Albany Thicket vegetation types in the Blue Crane Route / Camdeboo Local Municipal areas as Vulnerable Ecosystems (Fig. 1) requiring conservation and restoration.
3. ECBCP (2007) recommended land use objectives (Biodiversity Land Management Classes, BLMC) for all areas of the Eastern Cape. Most of Samara is BLMC1 (i.e. manage as conservation area for no biodiversity loss) and the balance of the thicket and mountain grassland vegetation as BLMC2 (minimal loss of ecosystem integrity & no transformation of natural habitat (Fig 2; Table 1). Table 2 indicates that the only recommended land uses for this area is for conservation (BLMC1) and in BLMC2 areas game farming and sustainable communal stock farming (Table 2).
4. The Responsible Tourism Sector Plans for Camdeboo and Blue Crane Route Municipality and Cacadu District Municipality Master Plan recommend that eco-tourism coupled with arid thicket restoration projects is the most environmentally, economic and socially sustainable use of land in the BLMC1 & 2 areas around Graaff-Reinet.

5. **Samara Game Reserve is doing exactly what is advocated. Turning land that was being degraded by unsustainable farming practices and producing decreasing economic returns and a reducing number of jobs into economically productive land, producing more jobs and in the process restoring degraded land so that it becomes more productive and preserves and re-instates threatened biodiversity identified as a national conservation priority.**
6. Samara has partnered with the Sub-Tropical Thicket Restoration Project. The aim is plant and "farm" with spekboom, one of the best plants weight for weight for carbon-sequestration in the world. This project has the potential, via the carbon market, to transform the rural economy of the Eastern Cape, using local labour to plant spekboom that will then give an annual return in the form of carbon credits. Eco-tourism ventures are the ideal vehicle to kick start this programme as they depend on veld restoration.

ECONOMY

1. Eco-tourism economy depends on selling bed nights. Under normal circumstances, for an eco-tourism (or any tourism) venture to be sustainable, an occupation rate of at least 40% is required (more for an expanding operation). **Consequently if a mining project results in a drop in occupancy of even a few %, this could make an entire eco-tourism venture un-viable** or at the very least stop further expansion of the venture.

In the case of gas mining near Samara, a slight drop in bed occupancy could lead to the economic sterilization of vast areas of land (in the case of Samara 28,000 ha) – it is not just the footprint of the mine that will be affected. The view of the unspoiled world famous Plains of Camdeboo from the plateau is critical to the eco-tourism attraction of Samara (and Camdeboo National Park and all other eco-tourism ventures in the area).

2. The Responsible Tourism Sector Plans identified the R63 linking the N10 and R75 as a potential Tourism Route to link Addo Elephant NP, Mountain Zebra NP and Camdeboo NP with Cookhouse / Somerset East / Pearston and Graaff-Reinet to maximize the impact of tourism on the local economy of the area and to develop tourism facilities and attractions along this route. Mining along this route will have a severe negative impact on this initiative (it would probably make it non-viable as a project).
3. Langholz & Kerley (2006) have shown that the move from livestock farming to game based eco-tourism has resulted in:
 - a. A 4.5 fold increase in the number of employees
 - b. A 32 fold increase in the wage bill
 - c. A 4.8 fold increase in average annual salary of each employee
4. The Subtropical Thicket Restoration Programme depends on enlightened landowners (such as Samara) to help take it beyond a pilot phase to a fully fledged and accepted clean development mechanism that can be traded for carbon credits on the world market.

5. Samara has created 80 direct jobs. Each direct job in the tourism industry creates 2.2 jobs in the tourism economy (via suppliers, etc). Consequently Samara supports 176 mainly local jobs in the tourism economy.

Social

1. Tourism jobs are mostly local and the training provided can be used in a wide spectrum of local hospitality careers (mining often uses imported labour and expertise that cannot usually be retained in the area once the mining has finished).
2. The thicket restoration project has the potential to create many jobs for unskilled local people and perhaps start a community trust with the carbon credits via a Fair Trade Mechanism.
3. Environmental Awareness with local school children is an ongoing programme of Samara's.

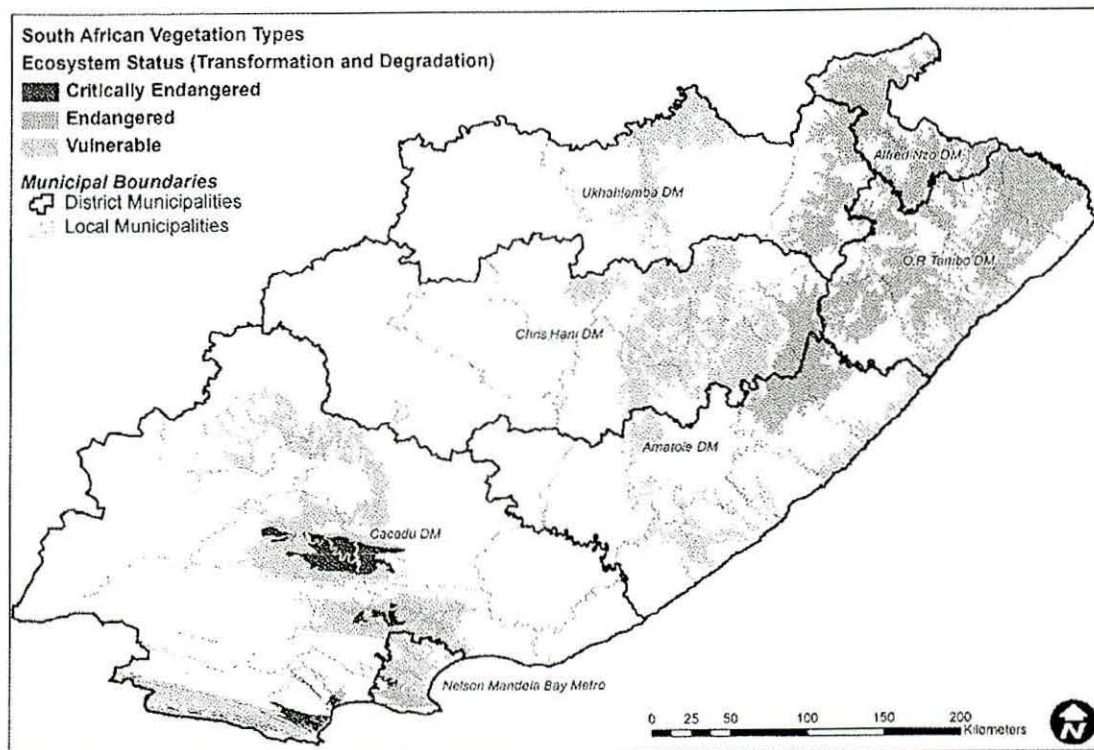
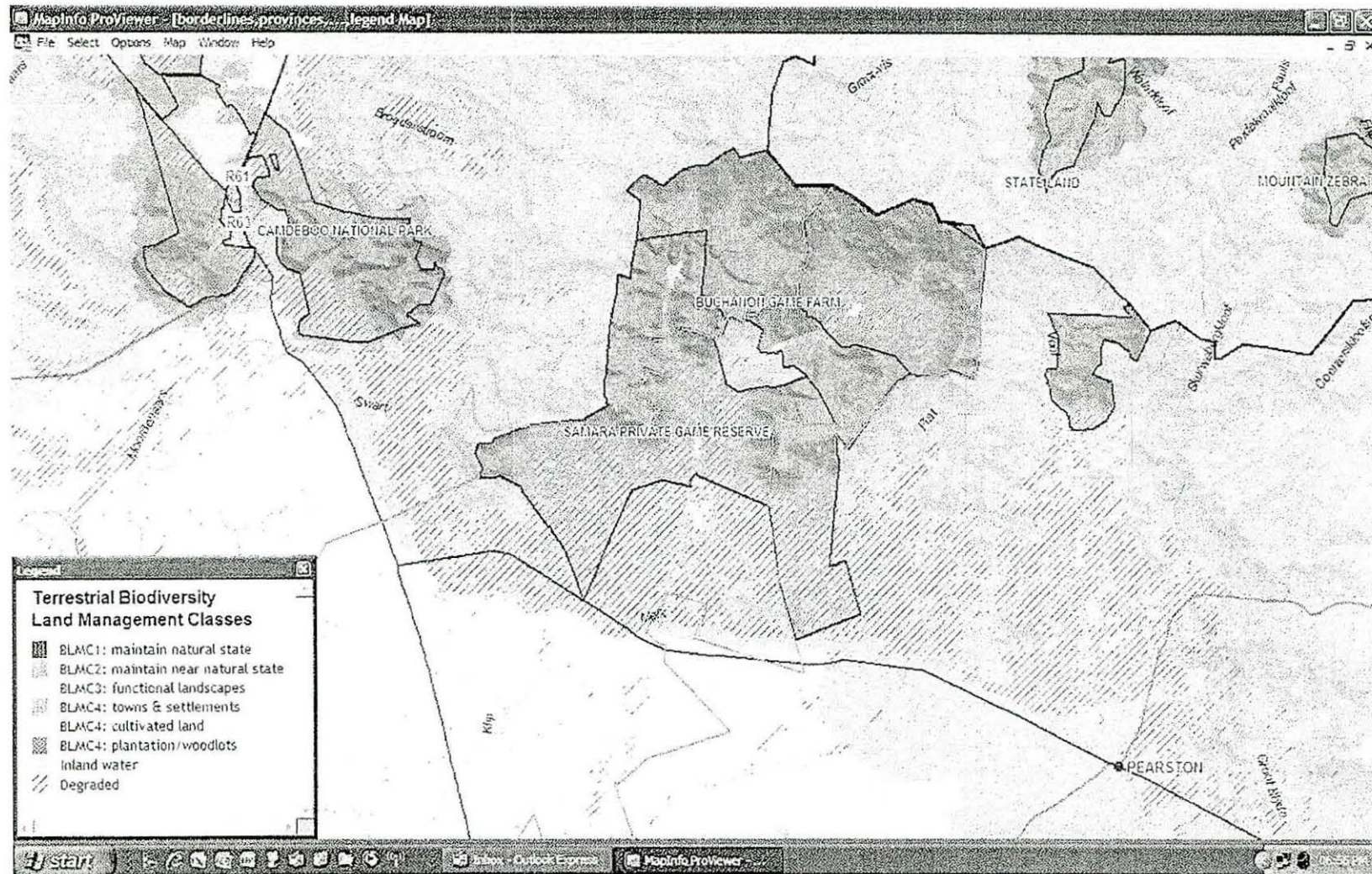


Figure 1. Ecosystem status of the Eastern Cape (ECBCP 2007)

Figure 2: The Biodiversity Land Management Classes for Graaff-Reinet Region (ECBCP 2007).



BLMC	Recommended Land Use Objective
BLMC1: Natural Landscapes	Maintain biodiversity in as natural state as possible. Manage for no biodiversity loss.
BLMC2: Near Natural Landscapes	Maintain biodiversity in near natural state with minimal loss of ecosystem integrity. No transformation of natural habitat should be permitted.
BLMC3: Functional Landscapes	Manage for sustainable development, keeping natural habitat intact in wetlands and riparian zones. Environmental authorizations should support ecosystem integrity.
BLMC4: Transformed Landscapes	Manage for sustainable development

Table 1. Land use objectives recommended in the Eastern Cape Biodiversity Conservation Plan for each Biodiversity Land Management Class (from ECBCP 2007).

Land use	Biodiversity Land Management Class			
	BLMC 1	BLMC 2	BLMC 3	BLMC 4
Conservation	Yes	Yes	Yes	Yes
Game farming	No	Yes	Yes	Yes
Communal livestock	No	Yes	Yes	Yes
Commercial livestock ranching	No	No	Yes	Yes
Dry land cropping	No	No	Conditional	Yes
Irrigated cropping	No	No	Conditional	Yes
Dairy farming	No	No	Conditional	Yes
Timber	No	No	Conditional	Yes
Settlement	No	No	Conditional	Yes

Table 2. Permissible land uses recommended in the Eastern Cape Biodiversity Conservation Plan for each Biodiversity Land Management Class (from ECBCP 2007).

"C"

REVITALISING THE GREAT KAROO TO THE WAY IT WAS

Samara Private Game Reserve consists of 28 000 hectares of indigenous vegetation. This area teemed with game before the arrival of the 19th century settlers. Lion, Elephant, Rhinoceros, Cheetah, and Buffalo once occurred in the area in huge abundance. The plains of Camdeboo once set the stage of one of the biggest migrations ever to occur on earth. Millions of Springbuck and Black Wildebeest crossed these immense plains in the search of better grazing and water. A sight which would cause the dust in this parched thierland to settle only after a number of days. This magnificent sight stopped abruptly with the onslaught of the 19th century settlers. Traditional game paths that the Springbuck followed for centuries made way for agricultural fences. Big game was massacred with heavy calibre weapons for sport. The migrations stopped and the game disappeared along with the extinction of the horse-like Quagga. It is the dream of Sarah and Mark Tompkins to be witness to these great migrations and see the footprints of large game that disappeared from here so long ago.

LOCATION AND TOPOGRAPHY

The reserve is located 20 km southeast of the town of Graaff-Reinet in the Camdeboo region of the Eastern Cape Province. It is located both below and on top of the southern portion of the Karoo Mountain Complex, which is, in turn, part of the Great Escarpment. The mountains of the reserve are represented by the Tandjiesberg (1 424 m) on the extreme western boundary, the Aasvoelberg (1 379 m) in the centre of the reserve, Spienkop (1 450 m) on the northeastern boundary and the Bouershoek (1 390 m) on the eastern part of the reserve. The reserve is separated North/South by the Apieskloof/Melkriver drainage system. In the southwestern and southeastern parts of the reserve, there are extensive flat Karoo plains characteristic of the Camdeboo area.

CONSERVING BIODIVERSITY

Samara is rich not only in its habitat and diverse surroundings but unusually it contains four of South Africa's seven biomes on one piece of land.

VELD TYPES/BIOMES

- 1-Plateaux Grasslands
- 2-Nama Karoo
- 3-Savanna
- 4-Valley Bushveld/Thicket

LIST OF MAMMALS OCCURRING ON SAMARA PRIVATE GAME RESERVE

-BATS

ORDER: CHIROPTERA

- Egyptian Free-Tailed Bat
- Cape Serotine Bat
- Egyptian Slit-Faced Bat

- Schreiber's Long-Fingered Bat
- Geoffrey's Horseshoe Bat

-INSECTIVORES

ORDER: INSECTIVORA

- Forest Shrew
- Reddish Grey Musk Shrew
- South African Hedgehog

-ELEPHANT SHREWS

ORDER: MACROSCHELIIDAE

- Smiths Rock Elephant Shrew
- Round-Eared Elephant Shrew

-PRIMATES

ORDER: PRIMATES

- Vervet Monkey
- Chacma Baboon

-RABBITS AND HARES

ORDER: LAGOMORPHA

- Scrub Hare
- Smith's Red Rock Rabbit

-RODENTS

ORDER: RODENTIA

- Ground Squirrel
- Common Molecat
- Springhare
- Pouched Mouse
- Namaqua Rock Mouse
- Striped Mouse
- Spectacled Dormouse
- Karoo Bushrat
- African Porcupine
- Pygmy Mouse
- House Mouse

-CARNIVORES

ORDER: CARNIVORA

- Black-Backed Jackal
- Cape Fox
- Bat-Eared Fox
- Cape Clawless Otter
- Striped Polecat
- Water Mongoose
- Yellow Mongoose
- Small Grey Mongoose

- Suricate
- Small-Spotted Genet
- Aardwolf
- Caracal
- Small Spotted Cat
- African Wild Cat
- Leopard
- Cheetah
- Brown Hyena

-ORDER: TUBULIDENTATA

- Aardvark

-ORDER: HYRACOIDEA

- Rock Hyrax

-ODD-TOED UNGULATES

ORDER: PERRISODACTYLA

- Burchell's/Plains Zebra
- Cape Mountain Zebra
- White Rhinoceros

- EVEN-TOED UNGULATES

ORDER: ARTIODACTYLA

- Springbuck
- Klipspringer
- Steenbuck
- Kudu
- Eland
- Oryx/Gemsbok
- Common Duiker
- Mountain Reedbuck
- Grey Rhebok
- Bushpig
- Giraffe
- Waterbuck
- Red Hartebeest
- Black Wildebeest
- Blesbuck
- Nyala

BIRDS

- Apalis**
- Avocet**
- Barbet**

Bar Throated

Pied

Batis	Cape Piru
Bee-Eater	European
Bishop	Red
Bokmakierie	
Boubou	Southern
Bulbul	Red-eyed Sombre
Bunting	Cape Golden-Breasted Larklike
Bustard	Rock Kori Ludwigs Stanley's
Buzzard	Jackal
Canary	Steppe Black-Headed Cape Streaky-Headed Yellow-Eyed White-Throated
Chat	Anteater Familiar Mountain
Cisticola	Stone Fan-Tailed Grey-Backed Levaillant's
Cormorant	Reed
Crane	Blue
Crombec	Long-Billed
Crow	Black Pied
Cuckoo	Diederiks Jacobin Red-Chested
Dikkop	Spotted
Dove	Cape-Turtle Laughing Namaqua Red-Eyed
Drongo	Fork-Tailed
Duck	African-Black Yellow-Billed
Eagle	Black/Verreaux's Booted Martial

Egret	Black Breasted Snake Eagle
	Carle
	Little
Eremomela	Yellow-Bellied
Falcon	Lanner
	Peregrine
Finch	Red-Headed
	Scaly-Headed
Finchlark	Grey-Backed
Fly Catcher	Fairy
	Forest
	Spotted
Francolin	Grey-Winged
Goose	Egyptian
	Spurwing
Goshawk	Osprey
	Pale Chanting
Guineafowl	Helmeted
Gymnogene	
Hammerkop	
Harrier	Black
Heron	Grey
	Black-headed
Honeyguide	Greater
	Lesser
Hoopoe	African
	Red-Billed Wood
Ibis	Habia
	Sacred
Kestrel	Eastern Red-Footed
	Lesser
	Rock
Kingfisher	Brown-Hooded
	Malachite
	Pied
Kite	Black-Shouldered
	Yellow-Billed
Korhaan	Black
	Karoo
Lark	Clapper
	Long-Billed
	Sabota
Longclaw	Orange-Throated
Martin	Brown-Throated
	House
	Rock
	Sand
Moorhen	Common

Mousebird	Red Faced Speckled White Backed
Nedicky Nightjar	Firenecked Rufous Checked
Ostrich Owl	Barn Cape Eagle Grass Scops Spotted Eagle Wood
Pigeon	Rammeron Rock
Pipit	Grassveld
Plover	Plain Backed Blacksmith Crowned Kittlitz's
Prinia	Three-Banded Namaqua Spotted
Quail	Common
Quelea	Red Billed
Raven	White Necked
Robin	Cape Karoo White-Browed Namaqua
Sandgrouse	
Secretarybird	
Shelduck	South African
Shrike	Fiscal Red-Backed
Sparrow	Cape House Grey-Headed Yellow-Throated
Sparrow Hawk	Black Red-Breasted
Starling	Cape Glossy Pale Winged Pied Red Winged
Stork	Warried
Sunbird	White Black Lesser Double-Collared

Swallow	Malachite European Greater-Striped Pearl-Breasted White-Throated
Swift	Alpine European Little White-Rumped
Tchagra Thrush	Southern Cape-Rock Olive
Tit	Cape Penduline Southern Grey
Titbabbler	Common Lanyard's
Vulture	Cape/Griffon
Wagtail	Cape
Warbler	Cape Reed Rufous-Eared Willow
Waxbill	Blue Common Sweet
Weaver	Cape Masked
White-Eye	Cape
Whydah	Pin-Tailed
Woodpecker	Cardinal Ground

REPTILES

SNAKES

- 1-Common Egg-eater
- 2-Brown house snake
- 3-Cape Cobra
- 4-Puff adder
- 5-Karoo whip snake
- 6-Spotted skaapsteker
- 7-Spotted house snake
- 8-Cape wolf snake
- 9-Mole snake
- 10-Sundevall's shovel snout
- 11-Montane grass snake
- 12-Red-lipped snake
- 13-Coral Snake
- 14-Rinkhals

- 15-Horned adder
- 16-Plain mountain adder

LIZARDS

- 1-Golden sand-skink
- 2-Ground agama
- 3-southern rock-agama
- 4-Karoo dwarf chameleon
- 5-Karoo girdled lizard
- 6-Ocellated sand lizard
- 7-Namaqua sand lizard
- 8-Bibrons thick-toed gecko
- 9-spotted thick-toed gecko
- 10-Marico thick-toed gecko
- 11-Eastern Cape crag lizard
- 12-Karoo thick-tailed gecko
- 13-Rock monitor lizard
- 14-Cape thick-toed gecko
- 15-Cape skink
- 16-Western rock skink
- 17-Variegated skink
- 18-Spotted desert lizard
- 19-Burchells sand lizard
- 20-Spotted sand lizard
- 21-Namaqua sand lizard
- 22-Namaqua plated lizard
- 23-Common long tailed seps
- 24-Cape girdled lizard

TORTOISES

- 1-Angulate tortoise
- 2-Mountain tortoise
- 3-Karoo padloper
- 4-Greater padloper
- 5-Cape terrapin
- 6-Tent tortoise

FROGS AND TOADS

- 1-Karoo Toad
- 2-Southern Pygmy Toad
- 3-Common Caco
- 4-Cape River Frog
- 5-Common Platanna
- 6-Giant Bullfrog

LIST OF QUESTIONS FOR AND ON BEHALF OF WOOLHEAD HOLDINGS LIMITED AND SAMARA PRIVATE GAME RESERVE (PROPRIETARY) LIMITED TO THE APPLICANT, BUNDU GAS & OIL EXPLORATION (PROPRIETARY) LIMITED AND THEIR CONSULTANTS, ENVIRONMENTAL IMPACT MANAGEMENT SERVICES (EIMS) IN RE. APPLICATION FOR EXPLORATION RIGHTS FOR GAS IN TERMS OF SECTION 79 OF THE MPRDA : PUBLIC MEETING ON 21 MAY 2009

A. THE APPLICANT:

1. Who are the directors of Bundu Gas?
2. Who are the shareholders (currently)?
3. Who are the shareholders or directors of Western Victoria Energy (Pty) Ltd (WVE)?
4. Is WVE owned by the ASX listed company Regal Resources (RR)?
5. What is RR's involvement?
6. With a share price on 1/5/09 of 4 AUS cents, why would RR invest here?
7. What verification can be provided for that Bundu Gas has access to adequate funds to perform the exploration activities and meet its obligations (eg. for rehabilitation)? This is asked so as to assess your ability to comply with Section 80(1)(a) of the MPRDA.

8. What are the financial capabilities of the shareholders of Bundu Gas (also in terms of Section 80(1)(a))?
9. What is Melbourne Capital's involvement?
10. What external funding is relied upon?
11. Have BEE partners been identified as yet?
12. Who are they?
13. What is their interest to be?
14. What level of progress has been made in your negotiations in that regard?
15. Have you submitted detail to the Agency of how your company will contribute meaningfully to the upliftment of and creating opportunities for historically disadvantaged people?
16. Can you supply a copy? If not, why have you not yet complied with this request by the Agency?
17. What are you planning to do in this regard?
18. What relevant expertise and experience does your company have or will it employ in its proposed action?

B. THE PROCESS:

1. Why was your initial application not persisted in?
2. How does the current application differ from the initial one?
3. Why have you refused to make the second application and supporting documentation available to affected persons? Will you now make it available?
4. The agency requires of you not only to notify affected persons of the application, but to **consult with them** in compliance with the MPRDA.(see Section 79(4).
5. May we assume that you are familiar with the provisions of Section 6 of the MPRDA, which requires that the administrative process be lawful and procedurally fair and that the Promotion of Administrative Justice Act 3 of 2000, applies to these proceedings?
6. Would you agree that this administrative action could adversely affect the rights of the public or the rights or legitimate expectations of any person (eg. the landowners)?
7. Would you agree then that affected persons are entitled to:
 - 7.1 Notice of the intended action (which you have given)?
 - 7.2 Details of the intended action (not yet supplied)?
 - 7.3 Be invited to comment on the action?

7.4 That that comment should be considered by the administrator of the action?

7.5 Determine the procedure and notify affected persons of the procedure to be adopted
(not done)?

7.6 Compile a written report on the enquiry?

7.7 Publish a summary of the report?

8. Do you consider yourself responsible for establishing and following the fair procedure?

9. What role do you feel the Agency should fulfill in this aspect of the matter?

10. The Agency considers its role to be "advisory" only and that you are responsible to comply with these aspects of the action. Do you agree with this approach?

11. What will you do with the "comment" obtained from interested parties at this meeting and outside of this meeting?

12. Would you, if this was indicated after consultation, review your application and withdraw or amend it if properly required of you?

13. Would you give opportunity for and accept written comment and representations from affected / interested parties?

14. Would you compile a written response and report after further comment and consultation and communicate with interested / affected parties thereon?

C. THE APPLICATION:

1. What research has your company done to prompt this application?
2. What / which sources / people were consulted by you?
3. Have you had access and regard to the data collected and reports compiled by Soekor after their exploration of the area in the 1960's?
4. Did you consult with any of the experts involved in that exercise?
5. Did you have regard to the Well Completion Report for the well CR1/68 situate on Cranemere?
6. Are you aware of the conclusion arrived at in the report that "no oil was found and the few gas-bearing joint zones intersected were too small of volume to be economically significant." and that the well was classed as a "dry hole with a gas show"?
7. The relevant reservoir was found to contain only 8.8 Mscf of dry gas, depleting at approximately 1 200 p.s.i. per day. Do you agree that this is an insignificant volume of gas?
8. Did you know that water supply for drilling was (at that time) difficult to obtain, necessitating the drilling of five boreholes, of which three were used on the site?

9. Would you agree that the Soekor reports are thorough?

10. Would you agree that they arrive at a strongly negative conclusion?

11. Why do you feel there is merit in revisiting this area?

12. What do you regard to be the source and reservoir rocks for the gas you have defined?

13. Do you intend to do any seismic surveys?

14. What will be the environmental impact of such seismic survey?

15. Do you know what the yields of water in boreholes in the area are?

16. If you drill only one hole for gas exploration, what mechanisms will be used to consolidate the gas pockets?

17. What will be the impact thereof on the environment?

18. If gas in commercially viable quantities is found, what would be the nature of the production well / plant?

19. Would gas be piped? Where to?

In short, how will it be exploited?

20. How did you arrive at the figure of R29 000,00 for rehabilitation?

20.1 Is it for a single site?

20.2 Does it include rehabilitation of new roads?

20.3 Does it cater for repair of damaged fences?

20.4 Does it cater for waste removal?

21. Would you please describe in detail, the drilling activities in Phase iii to us?

22. What type of drill will be used?

22.1 How many truckloads are required for the drilling rig and drilling materials?

22.2 What size trucks will be used to convey same?

22.3 What will the size of the drilling rig be?

22.4 What type of drilling fluid will be used and how will this be disposed of after drilling is completed?

23. How many vehicles will be used?

24. How many personnel will be employed?

24.1 Where will these personnel be housed?

25. Will it include earth-moving / excavation equipment?

26. What is the extent of the area that will be affected?

27. What waste will there be and how will it be disposed of, both during and after drilling activities?

28. How will you attend to the rehabilitation of the hole, the disposal site, roads and veld?

29. Where and when is it anticipated drilling operations will be commenced?

D. ENVIRONMENTAL IMPACT:

You have had a draft EMPR prepared by EIMS to comply with the Act and Agency's requirements.

1. Have you made this available to all parties (our client received it in May and it appears to have been completed in April)?
2. Have you studied and considered its content?
3. Does it accurately summarise your intended activities?

4. You describe in your application the process (vague) and conclude in B3 that the activities should have **little or no effect** on the environment.

4.1 How do you arrive at this conclusion?

4.2 It is not misleading?

5. Your environmentalist says the following on environmental impact on the following resources:

5.1 Water – significant impact;

5.2 Topography – medium negative impact;

5.3 Soil – low impact;

5.4 Geology – none;

5.5 Ecology – medium negative impact;

5.6 Air quality – low impact.

Do you agree with these findings?

6. Does this not alter your perception of the impact that your proposed activities will have on the environment?

7. The draft EMPR identifies **sensitive** areas, particularly the Samara area. Do you recognise and acknowledge this?
8. EIMS recommends that you exclude this area from your drilling and associated activities. Will you comply with this recommendation?
9. Will you avoid high-erosion areas as recommended by them?
10. Will you avoid rivers and wetland areas with adequate berth?
11. Will you appoint an on-site environmental officer?
12. Will you allow a monthly compliance audit by an **independent** environmental practitioner?
13. Will you meet this cost?
14. Would you allow the independent person to be nominated by interested / affected persons or an appropriate body?
15. Would you consult landowners and the environmentalist on drill sites and abide by their decision?
16. Would you consult landowners / DWEA on water and borehole drill sites and also be guided by the environmental compliance officer?

17. Have you / will you apply for relevant licenses and authorities for water use and other activities?

18. Will you implement the recommendations in table 10 of the draft EMPR?

19. Will you employ a hydrologist on matters relating to resources?

20. Will you employ an ECO (independent) to audit / monitor the process?

21. Will you arrange for the training of staff on environmental awareness? How will you set about this? Who will train them?

22. Will you employ an HSE (safety officer)?

23. When identifying drill sites, will you:

23.1 Consult landowners?

23.2 Have an assessment performed by the ECO?

24. When establishing roads, will you consult the landowners?

25. Have you budgeted for these items adequately? If so, what amounts have been earmarked for these items?

26. Do you buy into the audit process and will you comply therewith? In the event that you do not comply therewith, what guarantees can you furnish to satisfy affected landowners?

27. Are you prepared to lodge security to cater for damages to landowners arising from your activities or possible failure to properly rehabilitate affected areas monitored by an independent ECO?

28. If so, in what amount?

29. In view of the findings of EIMS on the sensitivities of the area, would you consider having a full EIA performed (as opposed to an EMPR)?

30. If not, do you undertake to comply with the recommendation by EIMS that prior to drilling activities proceeding, you will have an environmental impact study performed of the identified area?

31. Do you have any knowledge or have you cared to secure information on the following threatened resources in the affected area:

31.1 Water

31.2 The presence of threatened animal species (eg. cheetah / brown hyena)

31.3 Protected bird life (eg. blue crane)

31.4 Threatened flora (some species hundreds of years old)

31.5 The presence of fossils and indigenous rock art and other heritage sites of cultural / historical significance

32. Other than the information on gas found in Well CR1/68, is there anything in the geology to suggest that this site should be preferred above alternative sites in the Karoo? What are these geological indicators?

33. What are the positive impacts your intended activities will have on the community :

33.1 During the exploration phase?

33.2 During the mining / exploitation phase?

34. Will you consider performing an environmental impact assessment and securing a report from a suitably qualified environmentalist as contemplated and required in terms of Regulation 386 dated 21 April 2006 (item 8) of the Regulations promulgated under the National Environmental Management Act, 1998?

35. What steps have you taken to inform yourself of the presence of threatened fauna and flora in the area and are you aware that, by way of example, the following significant species may be threatened by your activities, namely:

35.1 That one of the rarest plants in the world, *polychepahela euphorbis* occurs only on Cranemere and in a very small area of Cradock?

35.2 Very rare species of Cycads occur in the area that cannot be replaced if destroyed?

35.3 A large flock of South Africa's national and endangered bird species, the Blue Crane, visits the Cranemere and Samara areas in the winter months to breed and their breeding patterns may be disrupted by your activities?

35.4 Numerous other endangered species occur on Cranemere and particularly on Samara?

35.5 Important heritage sites, including the oldest wagon routes in South Africa, dating back to the 1700's pass through Cranemere and Samara, which also host Khoi San paintings and prehistoric fossils?

36. Have you performed a study of the socio-economic effects of that which you propose and in particular, the negative impact it may have on employment opportunities in the eco-tourist industry, which is well-established in the area and particularly on Samara?

E. CONCLUSION:

When will you submit your report on the outcome of this meeting to the Agency / the Minister?



To: Environmental Impact Management Services
Attention: Liam Whitlow
Date: 5 June 2009

Enquiries: C.G.Pienaar
Our Ref: Mining/1/09
Your Ref:

APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)] WITHIN THE CANEMERE AREA; COMMENTS ON DRAFT EMP

Our comments on the Draft EMP of May 2009 are set out below:

1. General comments:

- 1.1. The name of the Department is incorrectly given on a number of pages in the draft EMP, please see letterhead for correct name.
- 1.2. With the current dynamic surrounding authorization of mining related activities it was felt necessary to comment briefly on the matter of authorizations required in terms of MPRDA versus NEMA [see Section 2 below].
- 1.3. With the exception of more intangible [soft] issues that will be highlighted in Sections 3 and 4 below, the draft EMP in our view does capture the essential environmental issues that are relevant to the application for exploration rights that are at issue now.
- 1.4. In addition the Department also has concerns regarding the actual "need and desirability" of the exploration that is being applied for. These concerns will be outlined in Section 4 of this comment.

2. Authorization in terms of NEMA and/or MPRDA

- 2.1. It seems clear that Phases 1 and 2 of the exploration program are very unlikely to entail any activities that may trigger NEMA EIA listed activities and which will therefore require authorization from this Department. One possible exception would be if new access roads broader than 4m to potential sites are needed for assessment purposes, and especially if any river or stream crossings were involved.
- 2.2. By the time Phases 1 and 2 as above have been concluded the current NEMA Regulations will have been replaced by new regulations, which are currently envisaged to take effect in October 2009. It is therefore not possible to determine what, if any, NEMA EIA authorizations might then be required before Phase 3 can be implemented.
- 2.3. The comments contained in this letter are therefore submitted as a commenting authority and not has an authorizing authority. The Department intends to take up this aspect at a national workshop on mining authorizations on 10 June 2009 and **reserves the right to submit additional comments on the Draft EMP, should doing so be deemed essential.**

3. Concerns regarding "Sense of Place" and other intangible impacts

- 3.1. In the view of the Department it must be understood that the strong resistance to exploration from some stakeholders in the Pearston area does not primarily stem from concerns regarding the likelihood, anticipated severity and duration of actual negative on-site bio-physical impacts that may result from exploration, and even more so from any future actual commercial exploitation.
- 3.2. Concerns are rather based-on on fears that more intangible impacts such as changes in "sense of place" and in the general character of the area will negatively impact on the viability of the existing private game reserves and on the success of the proposed conservancy. From past experience the Department knows that concerns of this nature can be valid and that negative impacts can be as real and tangible as on-site biophysical impacts.

3.3. At the same time one must however also concede that IAP's in applications for exploration rights tend to articulate their fears and concerns about future exploitation, rather than on the likely impacts of exploration only. This stems from a fear that exploitation will automatically follow if exploration was to have a positive outcome. The Department believes that this kind of concern should be taken seriously.

4. Need and Desirability

4.1. A number of court judgments, including from the Constitutional Court, has ruled that decision-making authorities must consider **all** the socio-economic impacts that their decisions might have, including potential impacts on other commercial enterprises in the affected area. These judgments also indicated that decision making authorities must have adequate information available on which to base decisions.

4.2. The reports submitted to this Department so far do not in any way address the matters raised in 4.1. above. To our knowledge the applicant has not submitted or disseminated any convincing information that demonstrates that the proposed exploration is based on a reasonable probability of finding exploitable reserves, that it is needed by broader society and local stakeholders and that benefits are likely to be of a magnitude that would off-set potential negative impacts.

4.3. Based on the information that is the disposal of this Department, and on our own experiences, we are of the view that a decision to grant exploration rights is likely to be vulnerable to strong legal challenges

5. Other issues

5.1. From a biodiversity conservation point of view the statement on Page 38 that Samara must be excluded from exploration "*where possible*" is not acceptable, it must be excluded.

5.2. The Department does not have adequate, recent information at its disposal to comment on the sustainability of water use, as well as the possibility of ground water contamination, that might be associated with Phase 3 of exploration. It will be appreciated if any comments received from Water Affairs on this draft EMP can be forwarded to us for our records.

6. Conclusion

6.1. The fact that the nature and extent of the activities that will be associated with Phase 3 of the exploration is not yet clear obviously makes it difficult to make final and conclusive comments.

6.2. Purely from the limited information currently at our disposal it is not clear that the benefits of granting exploration rights are likely to outweigh the potential negative impacts, both short and long-term.

6.3. It is understood that the applicant might be very reluctant to proceed with Phases 1 and 2 without a guarantee that Phase 3 can continue if the indicators from the first 2 phases are positive. This Department can however not commit itself in advance to concur to Phase 3 automatically proceeding, were the result from Phases 1 and 2 to be favourable.

Yours Sincerely



C.G.PIENAAR

SENIOR MANAGER ENVIRONMENTAL IMPACT MANAGEMENT

liam whitlow

From: liam whitlow [liam@eims.co.za]
Sent: 08 June 2009 09:11 AM
To: 'liamwhitlow@gmail.com'
Subject: FW: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)] WITHIN THE CANEMERE AREA
Importance: High

Liam Whitlow
 Associate
Environmental Impact Management Services (Pty) Ltd
 259 Kent Avenue, Randburg.
 P O Box 2083, Pinegowrie 2123, South Africa.
 Tel: (011) 789-7170 Fax: (011) 787- 3059
www.eims.co.za

<http://environment.blogs.com/>

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From: liam whitlow [mailto:liam@eims.co.za]
Sent: 04 June 2009 10:08 AM
To: 'Gerry Pienaar'
Subject: RE: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)] WITHIN THE CANEMERE AREA
Importance: High

Hi Gerry,

I just wanted to follow up on progress with your comments on the Bundu Gas Exploration EMPR? We need to start consolidating all comments and hope to finalise this by Tuesday next week. Please could you urgently advise when we can expect your feedback?

Please feel free to contact me if you have any queries or concerns?

Kind regards,
 Liam Whitlow
 Associate
Environmental Impact Management Services (Pty) Ltd
 259 Kent Avenue, Randburg.
 P O Box 2083, Pinegowrie 2123, South Africa.
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From: Gerry Pienaar [mailto:Gerry.Pienaar@deaet.ecape.gov.za]
Sent: 18 May 2009 08:29 AM
To: liam whitlow

2009/06/18

Subject: RE: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)]
WITHIN THE CANEMERE AREA

Dear Liam,

Will try for a.s.a.p., but please send a reminder once this becomes critical for you.

Regards

From: liam whitlow [mailto:liam@eims.co.za]

Sent: 15 May 2009 03:14 PM

To: Gerry Pienaar

Subject: FW: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)]
WITHIN THE CANEMERE AREA

Importance: High

Good day Mr Pienaar,

With reference to the email submitted by you below, please note that EIMS has completed the Draft EMPR for submission to the PASA for review and decision making.

As requested, please follow the link below to access the draft EMPR. Please could you ensure that you submit your comments to us as soon as possible. The Applicant intends to submit the final EMPR to the PASA by the end of May.

LINK: www.eims.co.za/images/eia/Bundu/DraftEMP.pdf

Please feel free to contact the undersigned should you have any queries or concerns.

Kind regards,

Liam Whitlow

Associate

Environmental Impact Management Services (Pty) Ltd

259 Kent Avenue, Randburg.

P O Box 2083, Pinegowrie 2123, South Africa.

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From: Gerry Pienaar [mailto:Gerry.Pienaar@deaet.ecape.gov.za]

Sent: Wednesday, April 15, 2009 8:10 AM

To: Juanita Rossouw

Subject: RE: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)]
WITHIN THE CANEMERE AREA

Dear Juanita,

The message below did not go through yesterday, probably due to size of attachment. Am trying without attachment.

REgards

2009/06/18

From: Gerry Pienaar
Sent: 14 April 2009 04:21 PM
To: 'Juanita Rossouw'
Subject: RE: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)]
WITHIN THE CANEMERE AREA
Importance: High

Dear Juanita,

1. The Eastern Cape Department of Economic Development has put in place a Biodiversity Conservation Plan for the province. The attached map shows your study area. In this regard we wish to comment as follows:
 - 1.1. Part of the study area includes or neighbors on private game farming/tourism reserves of high biodiversity conservation value. The potential impact of prospecting on these properties and operations must be properly considered, also in terms of potential noise and visual impacts.
 - 1.2. On the whole the study area is not of such environmental sensitivity that the proposed prospecting could be regarded as in some way fatally flawed.
 - 1.3. However, once the exact drilling areas have been determined botanical assessments should be done to determine sensitivity.
 - 1.4. The study area is rich in archaeological sites, the prospecting EMPR should definitely address this issue.
2. At this stage we do not have further comments, but would like to in detail consider and comment on a final draft of the prospecting EMPR.

Thank you

From: Juanita Rossouw [mailto:juanita@eims.co.za]
Sent: 25 March 2009 03:51 PM
To: Gerry Pienaar
Subject: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)]
WITHIN THE CANEMERE AREA

Dear Mr Pienaar,

As telephonically discussed please find attached a notice regarding the proposed exploration activities within the Canemere area, Eastern Cape.

Please feel free to contact the undersigned should you have any comments or queries.

Kind Regards

Juanita Rossouw

(M.Env.Sc Remedial and Sustainable Development)

Associate

Cand. Sci. Nat. Reg No. 20017/08

Environmental Impact Management Services (Pty) Ltd
259 Kent Avenue, Randburg.
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2009/06/18

Tel: (011) 789-7170 Fax: (011) 787- 3059

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Information from ESET NOD32 Antivirus, version of virus signature database 3192
(20080616) _____

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

Information from ESET NOD32 Antivirus, version of virus signature database 4005
(20090413) _____

The message was checked by ESET NOD32 Antivirus.

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liam whitlow

From: Gerry Pienaar [Gerry.Pienaar@deaet.ecape.gov.za]
Sent: 05 June 2009 02:29 PM
To: liam whitlow
Cc: Siyabonga Gqalangile
Subject: RE: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)] WITHIN THE CANEMERE AREA

No our comments are complete for now. We might however send a brief further comment after the national workshop on 10 June, but that will only happen if we might have missed a point of crucial importance.

From: liam whitlow [mailto:liam@eims.co.za]
Sent: 05 June 2009 02:22 PM
To: Gerry Pienaar
Subject: RE: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)] WITHIN THE CANEMERE AREA
Importance: High

Thanks Gerry,

With reference to your email below as well as the email received today with your comments, should we expect further submissions on Monday?

Kind regards,

Liam Whitlow
 Associate
Environmental Impact Management Services (Pty) Ltd
 259 Kent Avenue, Randburg.
 P O Box 2083, Pinetown 2123, South Africa.
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Sent: 05 June 2009 02:08 PM
To: liam whitlow
Subject: RE: APPLICATION FOR EXPLORATION RIGHTS [SECTION 79 OF THE MPRDA (ACT 28 OF 2002)] WITHIN THE CANEMERE AREA

Liam,

Will ensure that you have our inputs early on Monday 8 June 2009.

Regards

From: liam whitlow [mailto:liam@eims.co.za]
Sent: 04 June 2009 10:08 AM
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2009/06/18

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