

Comments and Responses 1681 Motuoane ER386 EIA

Mr Oratile E Kumang

Date 2025/05/27 Method Email

Comment

Good day NOTIFICATION REGARDING OPPORTUNITY TO PARTICIPATE IN THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS AS PART OF THE MOTUOANE EXPLORATION RIGHT 386 APPLICATION, WITHIN VARIOUS FARMS IN MATJHABENG LOCAL MUNICIPALITY, LEJWELEPUTSWA DISTRICT MUNICIPALITY, FREE STATE, SOUTH AFRICA I hereby would like to register as an Interested and Affected Party with regard to the abovementioned activities, the main reason being I am responsible for the admonition of Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983) otherwise known as CARA. Mr. ***** Resource Auditor Department of Agriculture

Response

Good day, We acknowledge receipt of your email. We have registered you as an Interested & Affected Party (I&AP) and you will continue to receive communications regarding the proposed project. Please feel free to contact us should you have any further comments/queries regarding the project.

Date 2025/03/17 Method Email

Comment

Please send notifications of this nature to *****@agrisa.org.za

Response

Initial notification forwarded to provided contact, and contact registered on database

Lerato Matebese

Date 2025/03/18 Method Email

Comment

Afternoon I'll also like to join however I'm also affected.

Response

Thank you for your email. This is to confirm that you have been registered as an I&AP of this project.

Ms Ria Barkhuizen

Date 2025/03/19 Method Email

Comment

Please forward your application to SANRAL Eastern Region *****@nra.co.za as this falls under their jurisdiction.

Response

Thank you for your email. Eastern Region has received the notification. Should you wish not to receive any further communication about this project to your own email, please let me know.

Elmar Roberg

Date 2025/03/18 Method Email

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Elmar Roberg

Comment

Note that the project is not on your website yet. Please add African Carbon Energy (Pty) Ltd as an I&AP. Please also provide me with a kmz to see if there is an overlap.

Response

Thank you for your email. This is to confirm that your details have been registered on our database. Please also find the attached KML file as requested.

Date 2025/03/18 Method Email

Comment

please add Vicsamoki Investments (Pty) Ltd as an I&AP. Please also provide a kmz of the applied for area.

Response

Thank you once more for your email. Before I can register the company as an I&AP, please also provide contact details of Vicsamoki Investments? Or should I include yourself as a representative of the company?

Date 2025/03/18 Method Email

Comment

Please add Agricary Farming (Pty) Ltd as an I&AP, and provide a kmz.

Response

I have registered your email (*****@africary.com) as the contact details for Africary. Please confirm if this is correct?

Date 2025/06/24 Method Email

Comment

Hi can you share the address of the office in Welkom and Mr Marx contact number, please. (at the public meeting he did say that anyone was welcome to pop in at any time.) Thank you

Response

Good day Elmar, Please see the requested information and *** contacts details: [Tel: *****](tel:*****) Virginia office address: Quest Centre, Virginia Way, Virginia, 9430, shop 3 (branded with D3Energy and Motuoane Energy)

Nolumanyano Camagu

Date 2025/03/17 Method Email

Comment

I would like to register as an I&AP. Can you please send me a map of the proposed exploration right.

Response

Email 1: Thank you for your email. You have been registered as an I&AP of this project. Email 2: Please see the attached locality map. Please let us know if you would like anything further.

Ms Andrea Seibritz

Date 2025/03/17 Method Email

Comment

Response

Comments and Responses 1681 Motuoane ER386 EIA

Ms Andrea Seibritz

Please register myself (*****@solagroup.co.za) as well as our general email ***@solagroup.co.za.

Thank you for your email. This is to confirm that the details provided have been included in our database.

Date 2025/03/17 Method Email

Comment

Response

Please register myself (*****@solagroup.co.za) as well as our general email ***@solagroup.co.za.

Thank you for your email. This is to confirm that the details provided have been included in our database.

Ms Mirna de Hart

Date 2025/03/17 Method Email

Comment

Response

Thank you for the information – can you please send us the kmz location of these properties and confirm that they do not overlap with Tetra4 PTY LTDs existing Exploration and Production Rights. You can also register Tetra4 PTY LTD formally as an Interested and Affected party. Communication can be sent to:- Jakes Koen *@renergen.co.za Robert Katzke *@renergen.co.za Mirna de Hart *@renergen.co.za Tinashe Maramba *@renergen.co.za

Thank you for your email. Please find attached KML of the area in question. I have also registered the listed individuals as I&APs.

Date 2025/03/17 Method Email

Comment

Response

Thank you for the information – can you please send us the kmz location of these properties and confirm that they do not overlap with Tetra4 PTY LTDs existing Exploration and Production Rights. You can also register Tetra4 PTY LTD formally as an Interested and Affected party. Communication can be sent to:- Jakes Koen *@renergen.co.za Robert Katzke *@renergen.co.za Mirna de Hart *@renergen.co.za Tinashe Maramba *@renergen.co.za

Thank you for your email. Please find attached KML of the area in question. I have also registered the listed individuals as I&APs.

Mr Taole Mokhele

Date 2025/03/17 Method Email

Comment

Response

My name is Taole Mokhele, residing in Matjhabeng Municipality. As a coordinator of Mining Affected Communities United in Action (MACUA) and the secretary of Goldfields Community Forum in our region, we would like to take part in the public participation intended to take place as community based organizations. I would therefore request that I be considered and

Thank you for your email. This is to confirm that you have been registered as an I&AP of this project.

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Mr Taole Mokhele

our members are as well considered and of course we will encourage them to register but due to limited access to data and airtime some of them won't be able to register as requested. I hope you find the above in order,

Date 2025/03/17 Method Email

Comment

We hope this email finds you well, as Goldfields Community Forum from Matjhabeng Municipality, we would like to have contact with any official from Motuoane Energy who deals with community organisation or community liaison officer for that matter whom we could engage with regarding community issues. I hope to hear from you soon,

Response

We have added Goldfields Community Forum as an Interested and Affected Party for the Motuoane ER386 Application. Kindly note that is currently no community organisation or community liaison officer as those are only required for production phase whereas the current application is for exploration activities. There is however, a team currently in Welkom are undertaking socio-economic studies. I have notified the team to contact you to organise a discussion in person, sometime this week. If necessary, depending on the nature of your interest in the project, there is a Motuoane Free State Representative which we can refer you to.

Date 2026/04/23 Method Email

Comment

Good morning Colleagues We hope you are doing well and this email finds you well. We have taken note of intention to resubmission processes on amended (EA). Please shout if you need any assistance on our side as mining communities(Goldfields Community Forum). One of the things that we were concerned about is that your consultations are too far from the communities. Our people are not in education, employment, and training. These projects will help our communities to alleviate unemployment and bring development to our communities. Looking forward to a long term working relationship with Motuoane Energy. We hope you find the above in order and hope to hear from you. With warm regards,

Response

Hi Taole, Thank you for your message and for raising this. We note your concern regarding the consultation venues being too far from the communities. Meaningful participation is important to us and we are engaging with our environmental team to review the location and accessibility of the consultation process. We appreciate your input and will keep you informed as the consultation arrangements are finalised. Kind regards,

CARL JACOBUS ELS

Date 2025/03/27 Method Email

Comment

Morning Please send a more detailed map, cant see on the one you send where exactly my farms is.

Response

Good day, We acknowledge receipt of your email below. We have registered you as an Interested & Affected Party (I&AP), and you will continue to receive communications regarding the proposed project. Please find attached the locality and Background Document for the project. Please feel free to contact us should you have any further comments/queries regarding the project.

Mr Aluta Ntsuku

Comments and Responses 1681 Motuoane ER386 EIA

Mr Aluta Ntsuku

Date 2025/03/18 Method Email

Comment

I wish to bring to your attention my absolute wishes to be part of your Project 1682. I live in welkom in the free state and a national deputy chairperson of Mejcon SA and also operational Cordinator of Voice of Matjhabeng

Response

Thank you for your email. This is to confirm that you have been registered as an I&AP of this project.

Smit Kruger

Date 2025/03/14 Method Email

Comment

Die betrokke persoon is nie meer in ons diens nie. Skakel gerus ons kantoor by ***** of stuur 'n e-pos aan ***@*****.co.za. Baie dankie Smit Kruger The person in question is no longer in our service. Please contact our office at ***** or sent an email to ***@*****.co.za Regards Smit Kruger

Response

No response sent to email. Initial notification letter forwarded to email referred to.

Canny Mothapo

Date 2025/03/17 Method Email

Comment

Thank you for the EIA notification, may you kindly resend the attachments to *****@caa.co.za and delist all other SACAA email addresses on your database. Kindly save and send your environmental impact analysis reports/meeting requests and request for comments to *****@caa.co.za, going forward please.

Response

Thank you for your email. Your request and suggestions have been understood. We have now deactivated all other CAA email addresses listed on our database.

Andre Bodenstein

Date 2025/06/24 Method Email

Comment

Good Afternoon Please send me the kmz file of the project layout. Regards

Response

Good day, Please find attached the KMZ for the proposed project.

Johan De Villiers

Date 2025/04/29 Method Email

Comments and Responses 1681 Motuoane ER386 EIA

Johan De Villiers

Comment		Response	
Dear Sir/Madam, I hereby wish to register as an Interested and Affected Party with regard to the EIMs and prospecting activities envisaged on the farm Kleindeel No 699, district Hennenman. I expect you to keep me fully informed of any further activities of both EIMS and envisaged prospecting, since those could significantly impact farming activities.		Good day, We acknowledge receipt of your email. We have registered you as an Interested & Affected Party (I&AP) and you will continue to receive communications regarding the proposed project. Please feel free to contact us should you have any further comments/queries regarding the project.	
Date	2025/05/27	Method	Email
Comment		Response	
Re: Veracity of Map information Dear Sir, There is conflicting information with regard to your maps as depicted in your scoping report: On the locality map the localities TA 11, TA12 and TA13 are shown On Appendix A the same localities are shown as TA9, TA10 and TA11. In fact, all the labels of the exploration sites need to be re-evaluated. Surely this would affect any detailed and unique information given with respect to these localities. This also calls into question the veracity of your documentation. Sincerely,		Good Day , Kindly note that during the Initial Call to Register and Notifications Phase, there were 13 target areas and 21 seismic transects proposed (before lodging the application). However, the applicant reduced the number of target areas from 13 to 11 and reduce the seismic transects from 21 to 16 during the Application and Scoping Phase (current phase). The map you are referring to was uploaded during the Initial Call to Register and Notifications Phase which is why it showed 13 target areas (including TA 11, TA12 and TA13). However, if you refer to the Scoping Report Folder on our website or hardcopies at the libraries, you will realise that there are only 11 target areas and 16 transects which are being applied for. You can refer to Section 1 and Section 2 of the Scoping Report for the locality and descriptions of the target areas and transects as well as Appendix A. We do hope the above is well understood. However, kindly contact us for further clarification (if necessary) or for any other comments / concerns relating to the project. Kindly be reminded that the Public Review & Comment on the Scoping Report ends 18 June 2025.	

Dawie van Rensburg

Date	2025/06/19	Method	Email
Comment		Response	
We refer to: 1.1 the application for environmental authorisation in terms of the National Environmental Management Act, 1998 by Motuoane Energy (Pty) Ltd ("Motuoane") pursuant to Motuoane's application for an exploration right in respect of an area of approximately 60,000 hectares and covering various farms and farm portions near the towns of Welkom, Virginia, Hennenman and Odendaalsrus, in the Free State Province, bearing Petroleum Agency South Africa (Pty) Ltd reference number 12/3/386 ("ER386 EA Application"); and 1.2 the Draft Scoping Report prepared by Environmental Impact Management Services (Pty) Ltd as Motuoane's appointed environmental assessment practitioner ("DSR"), circulated to registered interested and affected parties on 15 May 2025 for review and comment by 18 June 2025. We note that: 2.1 the SGD Boerdery Trust is the landowner of the Remaining Extent of farm Schapvaaktei 489 and Remaining Extent of farm Meijers Rust 168, in the magisterial district of Ventersburg, Free		RE: 12/3/386 Environmental Authorisation Application: Motuoane Exploration Right 386 Application, Free State Province - Comments on the Draft Scoping Report (May 2025) We acknowledge the comments submitted to EIMS on the 18th of June with reference to the 12/3/386 EA Application. Kindly refer to Table 7 below for comments received and responses thereof for your attention.	

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Dawie van Rensburg

State Province ("Properties"); 2.2 the SGD Boerdery Trust has concluded an option agreement with Mulilo Renewable Project Developments (Pty) Ltd ("Mulilo") which grants Mulilo and its relevant project company subsidiary the option to enter into a long-term lease to, among others, develop and operate its Litha Solar PV Project on the Properties ("Option"); 2.3 the DSR identifies that Mulilo's Litha Solar PV Project has already been granted an environmental authorisation(s) authorising its development and operation on the Properties; and 2.4 the ER386 EA Application includes the Properties and therefore overlaps with Mulilo's Litha Solar PV Project. [We accordingly object to the ER386 EA Application being processed or granted insofar as it includes the Properties, given that Mulilo's Litha Solar PV Project has already been authorised for development and operation on the Properties and that we have concluded the Option with Mulilo in respect of the development and operation of the Litha Solar PV Project on the Properties, and that we have not been consulted by Motuoane pursuant to its broader exploration right application submitted to the Petroleum Agency South Africa (Pty) Ltd.] OR [We accordingly request that Motuoane properly consult with us pursuant to its broader exploration right application submitted to the Petroleum Agency South Africa (Pty) Ltd, which has not occurred to-date; and further that any exploration activities which Motuoane intends undertaking on the Properties must consider and accommodate the construction and development of the Litha Solar PV Project, and that Motuoane negotiate an appropriate co-existence agreement(s) with Mulilo and/or the SGD Boerdery Trust.]

Carl Jacobus Els

Date 2025/03/17 Method Email

Comment

Are the following farms effected by the exploration? Brakvlei 2442 Mooitoekoms 2514 Sentiment 2432 Hennenman district And Braklaagte 737 Kroonstad district

Response

Apologies for the delayed response. I needed to make sure my information was correct before responding. As far as I understand, none of the properties fall within the Exploration Right Area. However, Farm Sentiment 2432 is adjacent to the area. Should you still wish to be registered as an I&AP and be informed about the project, please do let me know.

Date 2025/03/27 Method Email

Comment

Morning Please send a more detailed map, cant see on the one you send where exactly my farms is.

Response

Good day, We acknowledge receipt of your email below. We have registered you as an Interested & Affected Party (I&AP), and you will continue to receive communications regarding the proposed project. Please find attached the locality and Background Document for the project. Please feel free to contact us should you have any further comments/queries regarding the project.

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Johan Serfontein

Date 2025/05/27 Method Email

Comment

Good afternoon I have just received a notice regarding a public meeting planned for 28 May 2025 at Harmonie Primary School from 16:00-18:00 Please confirm Target Area 10 (VEG A) changed to TA 8 on my farm Vredesverdrag as per latest attached map per Whatsapp. Can you send a pro forma letter for comments in the meantime please. Regards

Response

Good Day The public meeting is indeed scheduled for 28 May 2025 at Harmonie Primary School from 16:00-18:00. We confirm that TA 10 (VEG A) is now changed to TA 8 (VEG A) on farm Vredesverdrag as per the attached revised locality map. Kindly find attached comment sheet for the project. Please note that the comment sheet is ideal for the public meeting but comments can be submitted in any format (email, fax, post, SMS) to EIMS: I&AP registrations, or any queries, comments, or concerns with regards to this application, can be directed to EIMS at: Contact Person: Alex Msipa EIMS Reference Number: 1681 Postal Address: P.O. Box 2083; Pinegowrie; 2123 Telephone: (011) 789 7170/ Fax: (086) 571 9047 E-mail: motuoane386@eims.co.za Please include the project reference number 1681 in all correspondence. Please feel free to contact the undersigned if you have any queries or concerns. We hope the above is in order and we will see you at the public meeting.

Date 2025/06/19 Method Email

Comment

We refer to: 1.1 the application for environmental authorisation in terms of the National Environmental Management Act, 1998 by Motuoane Energy (Pty) Ltd ("Motuoane") pursuant to Motuoane's application for an exploration right in respect of an area of approximately 60,000 hectares and covering various farms and farm portions near the towns of Welkom, Virginia, Hennenman and Odendaalsrus, in the Free State Province, bearing Petroleum Agency South Africa (Pty) Ltd reference number 12/3/386 ("ER386 EA Application"); and 1.2 the Draft Scoping Report prepared by Environmental Impact Management Services (Pty) Ltd as Motuoane's appointed environmental assessment practitioner ("DSR"), circulated to registered interested and affected parties on 15 May 2025 for review and comment by 18 June 2025. We note that: 2.1 the Johan Serfontein Trust is the landowner of the farm Vredesverdrag 427 and the farm Middelpunt 769, in the magisterial district of Ventersburg, Free State Province ("Properties"); 2.2 the Johan Serfontein Trust has concluded an option agreement with Mulilo Renewable Project Developments (Pty) Ltd ("Mulilo") which grants Mulilo and its relevant project company subsidiary the option to enter into a long-term lease to, among others, develop and operate its Middelpunt Solar PV Project on the Properties ("Option"); 2.3 the DSR identifies that Mulilo's Middelpunt Solar PV Project has already been granted an environmental authorisation(s) authorising its development and operation on the Properties; and 2.4 the ER386 EA Application includes the Properties and therefore overlaps with Mulilo's Middelpunt Solar PV Project. [We accordingly object to the ER386 EA Application being processed or granted insofar as it includes the Properties, given that Mulilo's Middelpunt Solar PV Project has already been authorised for

Response

RE: 12/3/386 Environmental Authorisation Application: Motuoane Exploration Right 386 Application, Free State Province - Comments on the Draft Scoping Report (May 2025) We acknowledge the comments submitted to EIMS on the 18th of June with reference to the 12/3/386 EA Application. Kindly refer to Table 4 below for comments received and responses thereof for your attention.

Comments and Responses 1681 Motuoane ER386 EIA

Johan Serfontein

development and operation on the Properties and that we have concluded the Option with Mulilo in respect of the development and operation of the Middlepunt Solar PV Project on the Properties, and that we have not been consulted by Motuoane pursuant to its broader exploration right application submitted to the Petroleum Agency South Africa (Pty) Ltd.] OR [We accordingly request that Motuoane properly consult with us pursuant to its broader exploration right application submitted to the Petroleum Agency South Africa (Pty) Ltd, which has not occurred to-date; and further that any exploration activities which Motuoane intends undertaking on the Properties must consider and accommodate the construction and development of the Middlepunt Solar PV Project, and that Motuoane negotiate an appropriate co-existence agreement(s) with Mulilo and/or the Johan Serfontein Trust.]

Mr John Geeringh

Date2025/03/24MethodEmail

Comment

Please send me a KMZ file of the proposed development area. Please find attached Eskom requirements **Document Content** TO WHOM IT MAY CONCERN Eskom requirements for work in or near Eskom servitudes. 1. Eskom’s rights and services must be acknowledged and respected at all times. 2. Eskom shall at all times retain unobstructed access to and egress from its servitudes. 3. Eskom’s consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals. 4. Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer. 5. If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer’s activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand. 6. The use of explosives of any type within 500 metres of Eskom’s services shall only occur with Eskom’s previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard. 7. Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom’s satisfaction. 8. Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including

Response

Thank you for your email as well as the attached Eskom Requirements. I will be saving the content thereof as part of Eskom’s general comments. However, I have attached the KML as requested. Should there be any specific concern considering the project area, please do not hesitate to contact us.

Comments and Responses 1681 Motuoane ER386 EIA

Mr John Geeringh

claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom’s services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer’s equipment. 9. No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom’s apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days’ notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager Note: Where and electrical outage is required, at least fourteen work days are required to arrange it. 10. Eskom’s rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with. 11. Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom’s satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom. 12. The clearances between Eskom’s live electrical equipment and the proposed construction work shall be observed as stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993). 13. Equipment shall be regarded electrically live and therefore dangerous at all times. 14. In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area. 15. Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant. 16. It is required of the developer to familiarise himself with all safety hazards related to Electrical plant. 17. Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom’s title deed at the developer’s own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party’s servitude deed must also include the rights of the affected Eskom servitude. John Geeringh (Pr Sci Nat)(EAPASA) Senior Consultant Environmental Management Eskom Transmission Division: Land & Rights

Makhura Maite

Date2025/05/09MethodEmail

Comment

Good day, As communicated telephonically. My name is **** * from the Department of Water and Sanitation Free State Region. I hereby register as an interested and affected party.

Response

Good day, We acknowledge receipt of your email. We have registered you as an Interested & Affected Party (I&AP) and you will continue to receive communications regarding the proposed

Comments and Responses 1681 Motuoane ER386 EIA

Makhura Maite

project. Please feel free to contact us should you have any further comments/queries regarding the project.

Mr Paul Wani Lado

Date 2025/06/24 Method Email

Comment

OBJECTIONS TO THE MOTUOANE EXPLORATION RIGHT 386 APPLICATION, WITHIN VARIOUS FARMS IN MATJHABENG AND MOQHAKA LOCAL MUNICIPALITIES, LEJWELEPUTSWA AND FEZILE DABI DISTRICT MUNICIPALITIES, FREE STATE PROVINCE, SOUTH AFRICA. 1. We submit these comments on behalf of our client's, the Mining Affected Communities United in Action (MACUA) and the Mining and Environmental Justice Community Network of South Africa (MEJCON-SA). 2. MACUA is an alliance of community members and mine workers who strive towards building solidarity between the different forms of struggle that beset society in order to ensure that the needs of people are placed before the greed of corporates. MACUA affirms that there is no authority greater than the will of the people. MACUA works towards respect for human rights, the promotion of and respect for gender, economic, environmental and social justice, a participatory democracy that involves inclusive decision-making and solidarity with the working class. 3. MEJCON – SA consists of a network of communities, community-based organisations and community members spanning across South Africa who advocate for environmental justice and the rights of those who are directly and indirectly impacted by the extractives industry. 4. The Centre for Environmental Rights is a firm of activist lawyers who defend the rights of communities and civil society organisations to an environment that is not harmful to health or wellbeing for the benefit of present and future generations. Through litigation, advocacy and activist support and training, we seek to advance our vision of a more equal society in which environmental and climate justice is realised and all people and the planet flourish. 5. This submission is made jointly with Natural Justice who objects to the proposed Project through this submission and in their name. Natural Justice works at the local, national, regional, and international levels with a wide range of partners and strives to ensure that community rights and responsibilities are represented and respected on a broader scale and that the gains made in international forums are fully upheld at lower levels. 6. Our clients note that Motuoane Energy (Pty) Ltd submitted a Scoping Report in support of an application for Exploration Right to explore for hydrocarbons over an area of approximately 58 000 hectares covering various farms near the towns of Welkom, Virginia, Hennenman and Odendaalsrus, within the Lejweleputswa and Fezile Dabi District Municipalities in the Free State Province. 7. Our clients’ concerns are based on the environmental and socio-economic impacts associated with the proposed exploration. In particular, our clients’ concerns centre around: a.

Response

Dear: Paul Wani Lado RE: OBJECTIONS TO THE MOTUOANE EXPLORATION RIGHT 386 APPLICATION, WITHIN VARIOUS FARMS IN MATJHABENG AND MOQHAKA LOCAL MUNICIPALITIES, LEJWELEPUTSWA AND FEZILE DABI DISTRICT MUNICIPALITIES, FREE STATE PROVINCE, SOUTH AFRICA We acknowledge the comments submitted to EIMS on the 18th of June with reference to the 12/3/386 EA Application. Kindly refer to Table 3 below of comments received and responses thereof for your attention.

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Mr Paul Wani Lado

The assessment of the climate change impacts; b. The assessment of the air quality impacts; c. The hydrogeological baseline investigation and associated groundwater impact assessment; d. The need and desirability of the proposed project; e. The public participation conducted; f. The impacts on food security and agriculture; and g. The lack of capacity to ensure compliance and enforcement at oil and gas operations. The Change Impact Assessment 8. Both the Climate Change Assessment (Appendix F3) and the Scoping Report mention that the quantification of Greenhouse Gas (GHG) emissions for the project will be part of the climate change specialist study that will be completed after the scoping phase. Our clients, however, have specific concerns about the “Plan of Study for the Impact Assessment” and other climate change and GHG emission issues identified in the Scoping Report and Climate Change Assessment appendix. 9. Page 177 of the Scoping Report notes: “the proposed activities will result in an increase of gas emitting wells substantially” then concludes that “the addition of up to 11 drilling wells will likely have low negative to insignificant cumulative impact on air quality and greenhouse gas emissions considering that the mitigation measures are implemented”. It is asserted that while inclusion of expected impacts is part of the scoping process, it seems premature and inaccurate to conclude, prior to estimating project emissions, that the emissions could have an insignificant impact on climate, while also stating that the activities will result in a substantial increase of gas emitting wells. For example, page 54 of the Climate Change Assessment states: “The impact significance is based on the quantified GHG emissions from the project” and that “the significance rating can only be provided once the impact assessment has been undertaken.” 10. Section 5 of Appendix F3 provides the “Plan of Study for the Impact Assessment”. It mentions that the impact assessment will “estimate the impact of the project on national greenhouse gas emissions”. Comparing a project’s emissions to national or global emissions is not appropriate or helpful in understanding a project’s climate impacts. We point to Interim Guidance on Consideration of Greenhouse Gas Emissions and Climate Change issued by the United States Council on Environmental Quality (CEQ) in January of 2023, which can be considered best practice, and which states that: “NEPA requires more than a statement that emissions from a proposed Federal action or its alternatives represent only a small fraction of global or domestic emissions. Such a statement merely notes the nature of the climate change challenge, and is not a useful basis for deciding whether or to what extent to consider climate change effects under NEPA. Moreover, such comparisons and fractions also are not an appropriate method for characterizing the extent of a proposed action's and its alternatives' contributions to climate change because this approach does not reveal anything beyond the nature of the climate change challenge itself--the fact that diverse individual sources of emissions each make a relatively small addition to global atmospheric GHG concentrations that collectively have a large effect. Therefore, when considering GHG emissions and their significance, agencies should use appropriate tools and methodologies to quantify GHG emissions, compare GHG emission quantities across alternative scenarios (including the no action alternative), and place emissions in relevant context, including how they relate to climate

Mr Paul Wani Lado

action commitments and goals.” 11. Every ton of GHG emitted has a meaningful impact on climate. Two useful tools for demonstrating this are the social cost of carbon (SCC) and the mortality cost of carbon (MCC). The SCC represents the economic cost associated with each ton of GHG emissions, taking into account the damages caused by climate change, such as impacts on human health, agriculture, infrastructure, and ecosystems. It provides a monetary value to quantify the societal impact of emissions. The MCC represents the number of expected excess deaths caused by the emission of a given amount of GHGs. The Climate Change Impact Assessment should include discussion and calculation of the Project’s SCC and MCC in addition to, or instead of, a comparison of the Project’s emissions to national emissions. 12. We note that the Plan of Study is fairly brief and lacks detail on specific methods for estimating emissions, so it will be important to make sure GHG emissions are estimated accurately and completely. Page 176 of the Scoping Report mentions that “Some common gases encountered during drilling operations include Hydrocarbons Gases, Oil and condensate gases, Carbon dioxide (CO₂), Helium (He), etc. Gas exploration may release amounts of methane, a potent greenhouse gas, either by accident or design”. The Climate Change Impact Assessment should include reasonable estimates of emissions of methane, CO₂, and non-methane volatile organic compounds (NMVOCs) that would result from fuel combustion, flaring, vegetation clearing, and leaks during the exploration process and the impact these emissions would have on climate change. 13. The plan also mentions that the assessment will consider “Scope 3 emissions (as far as is reasonable and practically possible)”. It is asserted that the assessment of the Project’s potential Scope 3 emissions should include quantitative estimates of downstream emissions that would result from the use of methane, CO₂, and other gases produced from future extraction facilitated by the project. Given that this is an exploration project, generating these estimates will likely require making multiple assumptions, but uncertainty should not be used as an excuse for not providing Scope 3 emissions estimates relating to potential future production. As mentioned above, the Scoping Report confidently notes: “the proposed activities will result in an increase of gas emitting wells substantially”. 14. This exploration project would not be proposed without the project proponents having some idea of how much recoverable gas they were hoping, and likely, to find. It is our clients’ assertion that the climate impact assessment should be revised. The Air Quality Impact Assessment 15. It is further submitted that the proposed project, like any mining/drilling operation supported by fossil fuel combustion, is anticipated to have numerous effects on air quality from a number of different sources. The scoping document largely ignores most of these impacts, focusing instead on methane as a greenhouse gas; Appendix F2 does go into more appropriate detail about the expected modeling and assessment of other pollutants. 16. The deterioration of air quality will have detrimental impacts on the health and wellbeing of affected communities and the nation at large. It is imperative that the air quality impacts be meaningfully and comprehensively assessed. 17. It is unfortunate that no background air quality monitors are available in the region. Given this absence, a complete assessment of environmental background will require

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the installation and use of air quality monitors to assess ambient concentrations of the various criteria (NAAQS) pollutants, an approach which our clients recommend. Since many air quality parameters are regulated on an annual (or rolling multiyear average) basis, many months of air quality data are required to obtain a reasonable background estimate. 18. Monitoring must represent sensitive receptors, i.e., the most sensitive humans receiving pollution, and so should be carried out in appropriate areas. While most of the area is agricultural, the city of Welkom is only a few km away. The average wind direction varies across the whole quadrant from North to East, with a substantial fraction (>20%) blowing west over Welkom1, an area which many of our clients' constituents reside. Therefore, air quality assessment in Welkom, rather than (or in addition to) the ER386 site, will be a priority. Additionally, air quality data is notoriously dependent on seasonality, and the background assessment must cover all reasonable variations. 19. It should be noted that air quality data must be compared to the correct regulatory values. A months-long air quality sample should be compared to the annual average value, and not to a shorter-term (e.g., 24h, 8h) average. The shorter averaging period is for the assessment of exceedances, and is not a long-term average. For example, particulate matter less than 10 microns in size (PM10) must maintain a long-term average below 40 µg/m³. The higher 24h standard of 75 µg/m³ is intended to catch short-term exceedances, and indeed, only four 24h periods exceeding this value are permissible in a year (and proportionally fewer in shorter averaging times). For complete evaluation of this data, the EIA must report comprehensive data on air pollution measures, including 24-hour averages across the entire period. 20. Once baseline data is established, it is asserted that the project proponent should submit estimates of the anticipated marginal increases due to the drilling emissions. These estimates derive from estimates of emissions and models of air transport. It is critical to note that the ambient air quality standards refer to the air breathed by the most sensitive receptors, which is a total of all pollution sources, not simply the pollution from the proposed facility. That is, if models predict (for example) a 10 µg/m³ annual average increase of PM10 in Welkom, and if the background PM10 concentration in Welkom is 10 µg/m³, the area would continue to meet air quality standards (since the total, 20 µg/m³, is below the 40 µg/m³ regulatory standard). Yet if the Welkom background were at 30 µg/m³, or even higher, the addition of 10 µg/m³ from the exploratory drilling (and, later, from production) could well exceed the standard. 21. Air pollution regulation treats pollutants as "threshold" chemicals, where an exposure below a defined threshold poses no risk. This is far from true. Many studies have now reported health effects at levels far below the thresholds, and it is now possible to estimate impacts of even very low exposures. For example, a recent meta-analysis of almost 200 air pollution studies assessed the effect of PM10 and PM2.5 on mortality. The authors report an overall estimate of the relative risk of mortality (from all causes) due to exposure to PM10 of 1.0041 per 10 µg/m³. That is, for each increase of 10 µg/m³ (as a long-term average), the risk of mortality increases by about 0.41%. Therefore, even exposures below the regulatory maxima are expected to cause calculable numbers of deaths. Both the project proponent and the

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government evaluators should be considering not just deaths and disease from levels exceeding regulatory limits, but those due to all exposures. 22. The SP impact assessment (p177) describes some potential impacts to air quality, but misses some of the most important. It emphasizes the release of methane, a potent greenhouse gas, but notes that "the risk of significant release of methane is mainly during the production phase, while the current project is only exploration," This is disingenuous, since a successful exploration project would almost certainly result in production drilling. Much of this impact assessment is devoted to methane and other greenhouse gases. Yet the proposed mitigation measures include actions to address impacts that have not been adequately discussed. For example, "reduce to nuisance [sic] factor of dust to neighbouring residents" and "implement dust suppression measures in all areas that will be affected by construction activities and where dust will be generated. Dust suppression must also be undertaken during windy and dry weather conditions", despite the lack of any clear evaluation of dust as a potential impact. 23. Moreover, the impact assessment and precautionary measures omit the most obvious impacts, those due to emissions from trucks, drilling rigs, and other equipment operated at the site. While these numbers may be low, it is critical that they are included, since these air pollutants have well-established health impacts. (Such pollution is likely to be much higher during the production phase.) This includes air quality pollutants like PM10 and PM2.5, which are caused by both mechanical and combustion processes; other gaseous emissions of combustion like SO2 and NO2; and ozone (O3) that is expected to form from the action of sunlight on local air pollution emissions, especially in combination with volatile organic compounds like methane. The baseline hydrogeological investigation and Groundwater Impact Assessment 24. In looking at the Baseline Geohydrological Assessment included in Appendix F7, it is clear that further information is needed to ensure a full and scientifically sound characterization of the potential impacts to groundwater resources. Given the potential for significant environmental and community consequences if aquifers are affected, the following should be required elements of the Environmental Impact Assessment of the project with respect to impacts on groundwater: 25. The assessment is largely based on regional analogues. It is submitted that there should be site-specific groundwater monitoring boreholes at and around proposed drilling sites which are able to (a) characterize aquifer properties (e.g., transmissivity, conductivity), (b) establish accurate baseline levels and water quality and (c) validate conceptual and numerical models. 26. Furthermore, there should be isotopic ($\delta^{18}\text{O}$, $\delta^2\text{H}$) and tracer (e.g., tritium, CFCs) analysis which can be used to identify hydraulic connectivity between aquifer and trace sources of potential contamination. Our clients also call for expanded groundwater quality parameters which test for dissolved (a) methane and hydrocarbons, (b) total petroleum hydrocarbons (TPH), (c) radionuclides (e.g., radon, uranium), and (d) microbial indicators (e.g., coliforms) to assess surface-aquifer interactions. 27. In terms of well integrity risk assessment, the EIA should include a detailed review of: well casing and sealing plans, the failure scenario modeling for potential leakage pathways and long-term abandonment and sealing protocols. Furthermore,

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there should be transient modeling and stress testing to evaluate drawdown and aquifer recovery near groundwater users, transient simulations and pump tests should supplement steady-state modeling. 28. When it comes to the modeling of groundwater–surface water interactions, the current assessment lacks a quantitative analysis of the impacts on nearby springs, wetlands, or rivers and contaminant transport between surface and groundwater. This should be addressed. Also, the EIA should establish thresholds for initiating groundwater remediation and spill and blowout response plans specific to aquifer protection in terms of emergency contingency planning. 29. Water is a scarce resources in South Africa and oil and gas operations not only are water-intensive, but they also carry a huge risk of polluting existing water sources. This will have a disproportionate impact on disadvantaged communities who cannot afford to mitigate against such. 30. All domestic, agricultural, and ecological groundwater users within a 2 km radius of the drill sites should accordingly be mapped and assessed for vulnerability. Lastly in terms of the consideration of climate variability, the projected changes in rainfall and recharge should be included to assess how long-term water table dynamics may affect aquifer vulnerability as well as the communities that depend on them. 31. Our clients assert that incorporating the above measures would significantly strengthen the EIA’s ability to protect public health and environmental resources. It would also ensure the project complies with applicable environmental regulations and best practices for groundwater stewardship. Need and desirability 32. Appendix 1 to the EIA Regulations 2014 states that one of the objectives of the basic assessment process is to “identify the alternatives considered, including the activity, location, and technology alternatives and describe the need and desirability of the proposed alternatives⁴” inter alia. 33. It is noted that the need and desirability assessment refers to energy policy such as the White Paper on the Energy Policy (1998), the National Development Plan (NDP) (2012), the Draft Integrated Energy Plan (IEP) (2013) and the Department of Energy’s Integrated Resource Plan (2010-2030) which speak to the development of South Africa’s oil and gas resources and the need o diversify the current energy mix, inter alia. The argument that gas from the proposed project will provide security of supply of gas due to increased demand is not fully substantiated. 34. Regarding the necessity of gas, however, it is our clients’ submission that there is no counter argument raised in the need and desirability assessment compiled by Motuoane that speaks to the idea that gas is a transition fuel. The energy crisis face by South Africa is a reality that cannot be ignored. However, it is argued that the answer is not to lock into another fossil fuel-based energy system. This alternative, the use of renewable energy, must be meaningfully explored in a comprehensive need and desirability assessment. 35. The reality is that there is a real need for a low-carbon electricity industry. A rush to lock into gas would be an expensive mistake. The International Institute for Sustainable Development’s (“IISD”) report titled, Gas Pressure: Exploring the case for Gas-fired power in South Africa⁵, makes the case for avoiding large scale gas infrastructure while referring to South Africa’s greenhouse gas reduction commitments, a better understanding of the science of climate change, a global shift away from fossil fuels and

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the falling price and advancing technology of renewable energy, inter alia. 36. The above factors have not been raised in the need and desirability assessment contained in the Scoping Report. Furthermore, the adverse economic impacts extraction must be comprehensively assessed. While gas is touted as a “bridging fuel” with economic benefits, regard must be had to the inevitable adverse economic impacts of locking South Africa into a long-term, large-scale gas industry with the associated infrastructure in the context of a world moving away from fossil fuel-based energy systems⁶. The costs of these adverse economic impacts would invariably be borne by the most vulnerable in South African society. 37. Furthermore, regard must be had to the economic upheaval that gas projects have on impoverished communities, particularly farm-workers and farm-dwellers whose livelihoods will be uprooted should exploration and production begin. These communities will also have to bear with the environmental destruction that will be caused by oil and gas operations. 38. With regards to the assessment of alternatives, this is an important part of the EA (Environmental Authorisation) application process in terms of NEMA. The EIA Regulations define alternatives as “different means of meeting the general purpose and requirements of the activity.” In determining the feasibility and reasonability of the need and desirability of alternatives, regard must be had to; the general purpose and requirements of the activity, need and desirability, the need to avoid negative impact altogether, the need to minimise unavoidable negative impacts, the need to maximise benefits and the need for equitable distributional consequences. 39. The consideration of feasible and reasonable alternatives to the proposed project is an important consideration which must entail a description and comparative assessment of the advantages and disadvantages that the proposed project and alternatives, such as renewable energy, will have. Public participation 40. Public participation is not a procedural formality; it is a constitutional and statutory right grounded in Section 2(4)(f) of the National Environmental Management Act, 1998 (NEMA), which states that “the participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.”⁷ In addition, Regulation 41 of the Environmental Impact Assessment (EIA) Regulations, 2014 requires access to information and consultation with all potential or registered interested and affected parties. 41. It is submitted that the Scoping Report submitted in support of the proposed project presents a public participation process that is legally inadequate and substantively exclusionary. While certain efforts were made, including the placement of site notices and newspaper advertisements, the actual implementation of the process failed to meet the constitutional and statutory standards for meaningful participation. 42. One of the most significant concerns raised by our clients relates to the limited accessibility of the scoping report itself. We are advised that only one hard copy of the Scoping Report was placed at a local library. Community members were not permitted to borrow or copy the document, forcing them to engage with a dense and highly technical report within the

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restrictive timeframe of a single on-site reading. This, coupled with the short public comment window and the complexity of the information contained in the report, made it extremely difficult for affected persons, including our clients, to understand the project or develop a reasoned position on its implications. 43. The venue selected for public engagement was also deeply problematic. It was situated in a location that was not easily accessible to most community members, particularly those living in outlying township areas such as Thabong, Bronville, and Saaiplaas. Many of these residents would have had to pay for transportation out of pocket to attend, thereby imposing a de facto financial barrier to participation. The courts have recognised that logistical exclusion of this kind undermines procedural fairness.⁹ In *Adams and Others v Minister of Mineral Resources and Energy and Others*, the High Court confirmed that meaningful participation requires deliberate efforts to overcome economic, geographic, and social barriers to engagement. 44. The notification process was also narrow and exclusionary. The Scoping Report confirms that notification was primarily directed toward already registered Interested and Affected Parties (I&APs), which effectively excluded broader members of the community who had not registered but who may still be significantly impacted by the proposed exploration activities. In *Sustaining the Wild Coast*, the Eastern Cape High Court made it clear that reliance on limited stakeholder databases or previous project lists is insufficient,¹⁰ and at this early stage of the process, the notifications relating to the Scoping Report should also be directed towards potential I&APs. The obligation to identify and engage all potentially affected parties lies squarely with the applicant and their environmental assessment practitioner. 45. Perhaps most revealing of the exclusionary nature of the process was the extremely low attendance at the public participation event, where fewer than 10 individuals were present. This low turnout is not evidence of community apathy; it is evidence of a flawed and inaccessible consultation process. A properly designed and inclusive participation process would have attracted a much broader and more diverse audience. 46. A further barrier to meaningful engagement was the use of English as the dominant language of communication during the participation process. It appears that only the Background Information Document and notifications were also published in Afrikaans and Sesotho. The Scoping Report, meeting proceedings, and technical materials were not made available in Sesotho or Afrikaans, the dominant languages of many community members in the Free State, which is acknowledged at 4.5.3.3 of the DSR. Given the complex terminology involved in Environmental Authorisation (“EA”) processes, the dominant use of English poses a serious barrier to understanding and undermines the rights of participants who are not fluent in the language. This omission contravenes both the Public Participation Guideline and the principles of equitable access under NEMA. 47. Taken cumulatively, these issues (restricted report access, inaccessible venues, limited notification, low attendance, and linguistic exclusion) demonstrate that the public participation process undertaken for Motuoane ER386 has not met the legal standard of “equitable and effective participation.” Participation is not a box-ticking exercise, it is a foundational requirement of procedural fairness and environmental justice. The

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Constitutional Court has held that administrative actions that exclude affected persons from participating in decisions that may impact them fail to meet the requirements of just administrative action under the Promotion of Administrative Justice Act, 2000 ("PAJA"). 48. Given the range of procedural and substantive deficiencies outlined above, the public participation process associated with the proposed project has not complied with the standards required under NEMA, the EIA Regulations. It is therefore submitted that the current public participation process must be revisited. Participation of informal land rights holders 49. The Scoping Report sets out that the identification of landowners has been undertaken through property registration information, and that "Negotiations with affected landowners are currently ongoing and will be undertaken in detail before activities are undertaken... Ensure that all affected landowners are identified, and relevant information is provided to the landowners during the application phase."12 50. The Scoping Report states that landowners were identified through Windeed searches and trust information obtained from the regional Deeds Office. However, there is no indication that lawful occupiers or persons with informal or customary rights in land have been identified or engaged. 51. It is asserted that there is no reason that the identification and notification of landowners and occupiers could not take place prior to the commencement of the Scoping & Environmental Impact Reporting process. This is extremely important, not only because of the notification requirements of NEMA and the EIA Regulations, but also because the law provides specific public participation requirements for a project that may result in deprivation of informal land rights. For instance, NEMA requires meaningful consultation with interested and affected parties whereas the Interim Protection of Informal Land Rights Act ("IPILRA") requires community consent for any proposed development that may deprive people of their informal land rights.13 It is already established in the Scoping Report that the proposed project may potentially impact people's graves, sacred sites etc. The repercussions of non-compliance with legislation, such as IPILRA, may be detrimental to the proposed project. 52. In *Maledu and Others v Itereleng Bakgatla Mineral Resources (Pty) Limited and Another*14 the Constitutional Court upheld an appeal brought by informal land rights holders who were evicted by the High Court from a farm in respect of which a mining right had been granted. The High Court had also granted an interdict retraining the informal land rights holders from entering and building structures on the proposed project area, however, both orders were set aside by the Constitutional Court. In *Baleni and Others v Minister of Mineral Resources and Others*15 the Pretoria High Court concluded that the Department of Mineral Resources and Energy lacks authority to grant a mining right where there has been noncompliance with IPILRA, despite being applicable. A direction quotation of the court's conclusion on this issue reads as follows: "The MPRDA and IPILRA must be read together. In keeping with the purpose of IPILRA to protect the informal rights of customary communities that were previously not protected by the law, the applicants in this matter therefore has the right to decide what happens with their land. As such they may not be deprived by their land without their consent. Where the land is held on a communal basis - as in

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this matter - the community must be placed in a position to consider the proposed depravation and be allowed to take a communal decision in terms of their custom and community on whether they consent or not to a proposal to dispose of their rights to their land.” 53. In light of the above legislative requirements and court decisions on the MPRDA and IPILRA, it is submitted that informal land rights holders in the project area must be informed and their consent for the project may be required. Impacts on food security (agriculture) 54. The proposed project is extensive in nature and, if authorised, potential pollution and contamination poses serious risk to food systems in the project area and beyond. The Scoping Report notes that “if the crop fields found within the ER are active, the prospecting activities will have an overall high residual impact on the agricultural production ability of the land”. Successive assessments should include analysis on the potential impacts of oils spills and other hazardous contaminant on the soil, water, fauna, wetlands etc, across the proposed project area and an indication of the extent to which the infection of such elements with oil spills and other contaminant will affect food systems, undermine food security and compromise the ov

Ms Phumla Ngesi

Date 2025/06/18 Method Email

Comment

Hi **** Please receive our comments attached. Kind regards

Response

Dear: **** RE: COMMENTS ON THE DRAFT SCOPING REPORT FOR ENVIRONMENTAL AUTHORISATION IN SUPPORT OF THE MOTOUANE ENVIRONMENTAL APPLICATION FOR THE EXPLORATION RIGHT BEARING REFERENCE 12/3/386 We acknowledge the comments submitted to EIMS on the 18th of June with reference 12-3-386. Kindly refer Table 2 below of comments received and responses thereof for your attention.

Thami Hadebe

Date 2025/03/17 Method Email

Comment

Your wayleave application with project reference number 1681/VM/am dated 14 March 2025 has reference. Transnet Pipelines, a division of Transnet SOC Limited, is not affected by the proposal. Your awareness of the existence of Transnet’s pipeline servitudes and concern for their integrity is highly appreciated. This authorisation shall be valid for 48 months from the date - 17 March 2025.

Response

Thank you for your response. Transnet’s input and comment is much appreciated.

Hans-Jurie Moolman

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Hans-Jurie Moolman

Date 2025/03/16 Method Email

Comment

I have no idea why our contact details are used in this communication and why we were identified as an interested and affected party. Should you wish that we consider the content of the document, we will require a formal instruction and an undertaking that your company will cover our professional fees. Should same not be received, you should for record purposes regard your communication to the writer as unread and disregarded for the reason as stated above.

Response

Your details were added to our database since Moolman & Pienaar were included in correspondence of June 2024 between ourselves and Elise Tempelhoff for a different, yet related project, that is, the 1596 Motuoane Hennenman EA Amendment. It was understood that the I&AP had included you in the correspondence to allow for your involvement in that and similar processes. Nevertheless, I will be recording your email, and I will then deactivate your details so that you do not receive further correspondence from us. However, should you wish to participate or comment, you may still do so.

Ms Janine Brasington

Date 2025/11/05 Method Email

Comment

Good day Alex, I trust you are well. Red Rocket has pending/granted NEMA rights over certain portions of land for renewable energy facilities in the Free State area. Kindly register the following parties from Red Rocket as I&APs for this project (1681) and application, as well as any other projects and applications Motuoane is currently undertaking or planning to undertake in the country. ***** (Environmental & Social Manager) - *****@redrocket.energy ***** (Environmental & Social Coordinator) - *****@redrocket.energy Kind regards

Response

Good day ***** We acknowledge receipt of your email. We have registered you and Tarryn Frankland as an Interested & Affected Party (I&AP) and you will continue to receive communications regarding the proposed project. Please don't hesitate to contact us if you have any further comments/queries about the project.

Danie Botha

Date 2025/03/17 Method Email

Comment

Kindly confirm when I registered as interested and affected party or on which clients behalf.

Response

Wessels & Smith were a pre-identified I&AP added to the current project's database. Your firm was added to the database due to your involvement in the Public Participation Process of the 1473 Tetra4 Cluster 2 Project in 2022, which shares similarities with the current project. Should you have no interest in the current project and would not like to be considered an Interested and Affected Party, kindly request registration, and I will remove your details from this project's I&AP database.

Ms Anna-Marie Ferreira

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Ms Anna-Marie Ferreira

Date 2025/06/19 Method Email

Comment

We refer to: 1.1 the application for environmental authorisation in terms of the National Environmental Management Act, 1998 by Motuoane Energy (Pty) Ltd ("Motuoane") pursuant to Motuoane's application for an exploration right in respect of an area of approximately 60,000 hectares and covering various farms and farm portions near the towns of Welkom, Virginia, Hennenman and Odendaalsrus, in the Free State Province, bearing Petroleum Agency South Africa (Pty) Ltd reference number 12/3/386 ("ER386 EA Application"); and 1.2 the Draft Scoping Report prepared by Environmental Impact Management Services (Pty) Ltd as Motuoane's appointed environmental assessment practitioner ("DSR"), circulated to registered interested and affected parties on 15 May 2025 for review and comment by 18 June 2025. We note that: 2.1 the Gersteen Trust is the landowner of the Remaining Extent of the farm Helpmekaar 615 and Portion 1 of the farm Helpmekaar 615, in the magisterial district of Ventersburg, Free State Province ("Properties"); 2.2 the Gersteen Trust has concluded an option agreement with Mulilo Renewable Project Developments (Pty) Ltd ("Mulilo") which grants Mulilo and its relevant project company subsidiary the option to enter into a long-term lease to, among others, develop and operate its Anker Solar PV Project on the Properties ("Option"); 2.3 the DSR identifies that Mulilo's Anker Solar PV Project has already been granted an environmental authorisation(s) authorising its development and operation on the Properties; and 2.4 the ER386 EA Application includes the Properties and therefore overlaps with Mulilo's Anker Solar PV Project. [We accordingly object to the ER386 EA Application being processed or granted insofar as it includes the Properties, given that Mulilo's Anker Solar PV Project has already been authorised for development and operation on the Properties and that we have concluded the Option with Mulilo in respect of the development and operation of the Anker Solar PV Project on the Properties, and that we have not been consulted by Motuoane pursuant to its broader exploration right application submitted to the Petroleum Agency South Africa (Pty) Ltd.] OR [We accordingly request that Motuoane properly consult with us pursuant to its broader exploration right application submitted to the Petroleum Agency South Africa (Pty) Ltd, which has not occurred to-date; and further that any exploration activities which Motuoane intends undertaking on the Properties must consider and accommodate the construction and development of the Anker Solar PV Project, and that Motuoane negotiate an appropriate co-existence agreement(s) with Mulilo and/or the Gersteen Trust.]

Response

RE: 12/3/386 Environmental Authorisation Application: Motuoane Exploration Right 386 Application, Free State Province - Comments on the Draft Scoping Report (May 2025) We acknowledge the comments submitted to EIMS on the 18th of June with reference to the 12/3/386 EA Application. Kindly refer to Table 5 below for comments received and responses thereof for your attention.

Date 2025/06/19 Method Email

Comment

We refer to: 1.1 the application for environmental authorisation in terms of the National

Response

RE: 12/3/386 Environmental Authorisation Application: Motuoane Exploration Right 386

Comments and Responses 1681 Motuoane ER386 EIA

Ms Anna-Marie Ferreira

Environmental Management Act, 1998 by Motuoane Energy (Pty) Ltd ("Motuoane") pursuant to Motuoane's application for an exploration right in respect of an area of approximately 60,000 hectares and covering various farms and farm portions near the towns of Welkom, Virginia, Hennenman and Odendaalsrus, in the Free State Province, bearing Petroleum Agency South Africa (Pty) Ltd reference number 12/3/386 ("ER386 EA Application"); and 1.2 the Draft Scoping Report prepared by Environmental Impact Management Services (Pty) Ltd as Motuoane's appointed environmental assessment practitioner ("DSR"), circulated to registered interested and affected parties on 15 May 2025 for review and comment by 18 June 2025. We note that: 2.1 DC Ferreira CC is the landowner of the Remaining Extent of the farm Erasme 614 and the Remaining Extent of the farm Ferreiras Rust 163, in the magisterial district of Ventersburg, Free State Province ("Properties"); 2.2 DC Ferreira CC has concluded an option agreement with Mulilo Renewable Project Developments (Pty) Ltd ("Mulilo") which grants Mulilo and its relevant project company subsidiary the option to enter into a long-term lease to, among others, develop and operate its Anker Solar PV Project on the Properties ("Option"); 2.3 the DSR identifies that Mulilo's Anker Solar PV Project has already been granted an environmental authorisation(s) authorising its development and operation on the Properties; and 2.4 the ER386 EA Application includes the Properties and therefore overlaps with Mulilo's Anker Solar PV Project. [We accordingly object to the ER386 EA Application being processed or granted insofar as it includes the Properties, given that Mulilo's Anker Solar PV Project has already been authorised for development and operation on the Properties and that we have concluded the Option with Mulilo in respect of the development and operation of the Anker Solar PV Project on the Properties, and that we have not been consulted by Motuoane pursuant to its broader exploration right application submitted to the Petroleum Agency South Africa (Pty) Ltd.] OR [We accordingly request that Motuoane properly consult with us pursuant to its broader exploration right application submitted to the Petroleum Agency South Africa (Pty) Ltd, which has not occurred to-date; and further that any exploration activities which Motuoane intends undertaking on the Properties must consider and accommodate the construction and development of the Anker Solar PV Project, and that Motuoane negotiate an appropriate co-existence agreement(s) with Mulilo and/or DC Ferreira CC.]

Application, Free State Province - Comments on the Draft Scoping Report (May 2025) We acknowledge the comments submitted to EIMS on the 18th of June with reference to the 12/3/386 EA Application. Kindly refer to Table 6 below for comments received and responses thereof for your attention.

Jacolette Adam

Date 2025/04/02 Method Email

Comment

Please register us as an IAP for this project,

Response

Thank you for your email and interest in this project. This is to confirm that your details have been registered on the database of this project.

Comments and Responses 1681 Motuoane ER386 EIA

Ms Paula Ann Novotny

Date 2025/06/18 Method Email

Comment

Environmental Impact Management Services (Pty) Ltd Attention: ***** Dear ***** We act for Mulilo Renewable Project Developments (Pty) Ltd ("Mulilo") and its project company subsidiaries, who are interested and affected parties ("I&APs") in respect of the application for environmental authorisation in terms of the National Environmental Management Act, 1998 by Motuoane Energy (Pty) Ltd ("Motuoane"), pursuant to Motuoane's application for an exploration right in respect of an area of approximately 60 000 hectares and covering various farms and farm portions near the towns of Welkom, Virginia, Hennenman and Odendaalsrus, in the Free State Province, bearing Petroleum Agency South Africa (Pty) Ltd reference number 12/3/386 ("ER386 EA Application"). Mulilo and its project company subsidiaries hereby submit their comments on the Draft Scoping Report ("DSR") and their objection against the granting of the ER386 EA Application, pursuant to the EIMS notice of 15 May 2025 calling on all registered I&APs to provide comments on the DSR by 18 June 2025. Please acknowledge receipt of this submission.

Response

Dear: ***** RE: 12/3/386 Environmental Authorisation Application: Motuoane Exploration Right 386 Application, Free State Province – Comments on the Draft Scoping Report by Mulilo Renewable Project Developments (Pty) Ltd and its project company subsidiaries We acknowledge the comments submitted to EIMS on the 17th of June with reference to the 12/3/386 EA Application. Kindly refer to Table 9 below for comments received and responses thereof for your attention.

Mojaki Marumo

Date 2025/04/17 Method Email

Comment

Good day, Hope you're doing well I would like to register as an interested and affected party for the project 1681.

Response

Good day, We acknowledge receipt of your email. We have registered you as an Interested & Affected Party (I&AP) and you will continue to receive communications regarding the proposed project. Please feel free to contact us should you have any further comments/queries regarding the project.

Philip Nel

Date 2025/03/17 Method Email

Comment

I am writing this email on behalf of Wesboerdery (Pty) Ltd and its director, Mrs. L.P. Wessels. Wesboerdery (Pty) Ltd is the owner of the the following farms on the list earmarked for exploration under Motuoane 386: • Cijfergat 345 • Doringhoek 2478 • Kromhoek 2561 • Kareeboom 2593 and Mrs. L.P. Wessels is the owner of • Uitzicht 2408 Please provide us with more information with regards to this exploration and to how the farms may be impacted. You can use *****@mysenwes.co.za as email address for future correspondence.

Response

Good Day Philip, Thank you for your interest and landownership information provided below. Kindly find attached Background Information Document with available project information for now (also available on our website <https://www.eims.co.za/2025/03/18/1681-motuoane-er386-eia/>). We are currently undertaking the scoping and EIA process to assess the potential impacts on farms and how these can be best mitigated, this information will be made available to all Interested and Affected Parties including yourself once available and will also be uploaded on the

Comments and Responses 1681 Motuoane ER386 EIA

Philip Nel

website (same link above). All registered I&APs will be notified when the information is available. Kindly note that we have also undertaken a similar project just east of the current Motuoane Exploration Right 386 footprint, known as Motuoane Exploration Right 315. Although yet to be confirmed by new specialist studies based on receiving environment for the ER386, it is anticipated that the impacts on farms will largely be same as those on ER315. For now you can refer to the Motuoane Exploration Right 315 Assessment Report (<https://www.eims.co.za/2024/05/16/1596-motuoane-part-ii-ea-amendment/>) to see the potential impacts and mitigation measures for those farms (Chapter 5 of the Amendment Report). We would appreciate if you have any comments or suggestions for us to consider in the current Motuoane Exploration Right 386 application in terms of impacts and mitigation measures. Kind Regards, Vukosi Mabunda

Mr Maritz Nel

Date 2025/05/08 Method Email

Comment

Further to my previous email. Please see below email that was send by you to email addresses that has not been used for more than 12 years. I don't know where you got this besides from digging and searching for information without my consent or approval, further you have included emails to yahoo uk address that has absolute no reference or interest in this. Why you would do that is again clear evidence that you search and dig for information without our consent or agreement. We are not taking these matters lightly and see this as violation of our privacy and a very blame and disrespectful act to send emails to incorrect email address and searching for information on people without their consent I will not accept this behaviour and actions and demand your immediate correction of this.

Response

I present myself as Mr Vukosi Mabunda, a Senior Consultant from Environmental Impact Management Services (Pty) Ltd (EIMS). Motuoane Energy (Pty) Ltd (Motuoane) has appointed EIMS as the Independent Environmental Assessment Practitioner (EAP) to assist with undertaking the required assessment and authorisation processes in support of application for the Motuoane Exploration Right 386 (see attached BID). We would to request for ecology specialists from The Biodiversity Company to access your property next week to undertake ecological studies as per the target area indicated below. The details of the specialist are indicated on the attached landowner request access form. The preliminary plan is for the specialists is as follows (please see map and image for reference): Monday 7 April – Target Areas 6, 7, 8, 9, 10 (Harmony Cluster) Tuesday 8 April – Target Areas 1, 2, 3, 4, 5 (Virginia and Welkom Area) Wednesday 9 April – Target Areas 11, 12, 13 (Hennenman Area) Thursday 10 April - Extra day. Specialist will contact landowners if they need to be in a specific area. Please note that these dates may change as specialists conduct field work. They will contact landowners if that is the case. Specialists will be in the field from 7:00 - 18:00.

Date 2025/05/09 Method Email

Comment

Good day ***** I have tried to call you yesterday and have send various messages to you also yesterday with no response. We have not agreed to anything nor have we entered into any agreement! I have made it very clear to FJ from the outset that I do deal with 3rd parties and

Response

Good Day *****, We confirm receipt of your request as per the email below. Please take note of the following important information: • Although we were following the legislated requirements, we do apologise for contacting you regarding the project especially through means

Comments and Responses 1681 Motuoane ER386 EIA

Mr Maritz Nel

give no authority for anybody to send information with our farms included nor have we give permission or agreed to any searches or violation of our POPI Act rights. You have breach all these laws by send out information about our farms to 3rd parties with out our consent. You have don searches and send email to people that has no interest in any of these farm by doing incorrect searches again this is against the POPI Act. You have violated all our privacy and tried to dig for information with out our consent or agreement. I have send you various messages yesterday to confirm that ALL our farm is removed from you study and assessment before close of business yesterday and that this must be confirmed in writing before close of business yesterday. This was not done! Nor have you send the email to all the parties as you did wrongly to inform them that our farm is removed and not part of you study or assessment. I will allow you time until 11:00am this morning for all of this written confirmation to be send. If this is not done, I will proceed with actions against you and the company for violation of various POPI Act regulations. Regards

you are comfortable with, i.e., directly as the consultants. • Kindly note that your contact information that we have on our database will be removed immediately and you will not be notified of the application or availability of any reports going forward. • Please also note that relevant third parties associated to you will be notified that the affected properties and proposed activities within those properties will not be proceeding through the current application. • Also note that activities planned on your farms will not be undertaken during this process, your properties will be removed from the application and assessments thereof. Please do note that Public Participation Process for the proposed project is being undertaken in accordance with the requirements of the Mineral and Petroleum Resources Development Act 28 of 2002 and the National Environmental Management Act (NEMA) and its Environmental Impact Assessment Regulations (2014 as amended), and in line with the principles of Integrated Environmental Management (IEM). We can confirm that in accordance with the Protection of Personal Information Act (Act 4 of 2013), none of your personal information (emails, contact numbers, address) were made available to any Interested and Affected Party.

Date 2025/05/09 Method Email

Comment

Good day ***** I have tried to call you yesterday and have send various messages to you also yesterday with no response. We have not agreed to anything nor have we entered into any agreement! I have made it very clear to FJ from the outset that I do deal with 3rd parties and give no authority for anybody to send information with our farms included nor have we give permission or agreed to any searches or violation of our POPI Act rights. You have breach all these laws by send out information about our farms to 3rd parties with out our consent. You have don searches and send email to people that has no interest in any of these farm by doing incorrect searches again this is against the POPI Act. You have violated all our privacy and tried to dig for information with out our consent or agreement. I have send you various messages yesterday to confirm that ALL our farm is removed from you study and assessment before close of business yesterday and that this must be confirmed in writing before close of business yesterday. This was not done! Nor have you send the email to all the parties as you did wrongly to inform them that our farm is removed and not part of you study or assessment. I will allow you time until 11:00am this morning for all of this written confirmation to be send. If this is not done, I will proceed with actions against you and the company for violation of various POPI Act regulations. Regards

Response

Good Day *****, Following on the email below, we are removing properties and contact information associated with you and your third parties for this application. The table below show the information we have on our database for the properties associated with you. May you please confirm that this list complete and indicate any other property and/or contact information we may have missed. Once we have your confirmation, we will notify the relevant parties. ***List of properties*** Once more, we apologize for any inconvenience caused. Motuoane and EIMS are still open to meet and discuss with you a way forward which you may be comfortable with should you wish to change your mind. Thank you in anticipation of your response.

Date 2025/05/09 Method Email

Comment

Response

Comments and Responses 1681 Motuoane ER386 EIA

Mr Maritz Nel

Good day, There is various board across Hennenman, Virginia, Theunissen, Welkom and Riebeeckstad with photos of your study and assessment. All these board have our farms on as part of the assessment, please have all these board removed immediately which shows our farms as part of you assessment. Once again where did you obtain the below information? Like I said these emails is outdated with years and you surely you need to dig or do unauthorized searches to get this information because it was definitely not supplied by me. My instruction to **** was very simple and straight forward. Nothing get done with out my consent or approval. This is totally the opposite what happened Please get all the boards removed and send confirmation. (I will personally inspect this) We don't have any appetite to deal with you any further. Email 2 Good day, I was out of town and came back yesterday and picked up that the board in Hennenman, Virginia, Theunissen, Welkom, Odendaalsrus, Riebeeckstad and Ventersburg is still all over the place and all these board has photos of our farms on them. My instruction was clear that these needed to be removed immediately but has not been done.

Good Day Maritz, We confirm receipt of your request as per the email below. Please take note of the following important information: • Although we were following the legislated requirements, we do apologise for contacting you regarding the project especially through means you are comfortable with, i.e., directly as the consultants. • Kindly note that your contact information that we have on our database will be removed immediately and you will not be notified of the application or availability of any reports going forward. • Please also note that relevant third parties associated to you will be notified that the affected properties and proposed activities within those properties will not be proceeding through the current application. • Also note that activities planned on your farms will not be undertaken during this process, your properties will be removed from the application and assessments thereof. Please do note that Public Participation Process for the proposed project is being undertaken in accordance with the requirements of the Mineral and Petroleum Resources Development Act 28 of 2002 and the National Environmental Management Act (NEMA) and its Environmental Impact Assessment Regulations (2014 as amended), and in line with the principles of Integrated Environmental Management (IEM). We can confirm that in accordance with the Protection of Personal Information Act (Act 4 of 2013), none of your personal information (emails, contact numbers, address) were made available to any Interested and Affected Party.

Zenani Mhlungu

Date 2025/03/18 Method Email

Comment

I hope this email finds you well. I write on behalf of Natural Justice to formally request registration as an Interested and Affected Party (I&AP) in relation to the Motuoane Exploration Right 386 Application (Project Reference No. 1681). Natural Justice is an environmental legal organization that engages in matters concerning environmental governance and procedural compliance. As such, we have an interest in the Environmental Impact Assessment (EIA) process and would appreciate being kept informed of all relevant developments, including public participation opportunities, notifications, and access to all relevant reports and documentation. Please register Natural Justice as an I&AP under the following details: Designated Contact Person: Zenani Mhlungu Position: Defending Rights, Programme Officer Email Address: *****@naturaljustice.org Contact Number: ***** Additionally, we kindly request that all correspondence be CC'd to my colleagues; • Melissa Groenink-Groves: *****@naturaljustice.org; • David Mtshali: *****@naturaljustice.org; • Rantsho Moraka: *****@naturaljustice.org; to ensure that the relevant team members remain informed. Please confirm receipt of this request and our registration as an I&AP at your earliest convenience. Should any further information be required to facilitate this process, please do

Response

Thank you for your email. This is to confirm receipt of your email, and confirm that the details provided have been included in our I&AP database.

Comments and Responses 1681 Motuoane ER386 EIA

Zenani Mhlungu

not hesitate to reach out.

Envir Onmental

Date 2025/05/27 Method Email

Comment

Yes, conventional drilling processes often utilize chemical additives in drilling fluids, also known as drilling mud, to enhance its properties and improve drilling efficiency. These chemicals play a crucial role in various aspects of the drilling operation, including rheological control, fluid loss, and wellbore stabilization. Yes, conventional drilling can lead to groundwater contamination. This occurs through several mechanisms, including the direct discharge of contaminated fluids like drilling muds and wastewater, the potential for leaks or spills during drilling operations, and the introduction of chemicals used in drilling processes into the subsurface. Conventional oil and gas drilling can lead to groundwater pollution through various pathways, including well construction issues, surface activities, and the management of waste streams. Contaminants can enter groundwater. Conventional drilling in agriculture, often referred to as conventional tillage, involves tilling the soil multiple times before planting to create a seedbed. This can have both positive and negative impacts on soil and crop health. While it can increase yields and control weeds, it can also lead to soil degradation, water pollution, and reduced biodiversity. I want to [be registered] as I&P parties for ER 386

Response

Good Day, We have realized that you have not registered as an Interested and Affected Party (I&AP) for the Motuoane Exploration Right 386 EIA 12/3/386 Project. As per the email below and attached Notification to registered I&APs, a public meeting has been scheduled for Wednesday 28th May at Harmonie Primary School (2 Vondeling Road, Virginia) between 16H00 and 18H00. We would like to have a focus group meeting with you on the same day before the meeting, the purpose of the meeting will be as follows: 1. Explain the EIA Process; a. Scoping Phase b. EIA Phase c. Authority review and decision phase d. Notification of Decision e. Appeal Phase (if any appeals are received) 2. Provide detailed information about the project; a. Proposed activities b. Identified Impacts c. Preliminary Mitigation Measures d. Plan of study for EIA Phase 3. Capture your concerns / comments which will formally be responded to as part of the EIA process; Would you kindly indicate your availability for the meeting for Wednesday 28th May so we can schedule it accordingly? There are D3 Energy Facilities in Welkom which we can use for the meeting. Alternatively, we can schedule a virtual meeting to suit your availability, we do however prefer a physical meeting. Please also indicate if you would like to register as an I&AP for this project? Registering as an I&AP will allow you to receive project related information such as public meetings, reports and authority decision.

Date 2025/06/10 Method Email

Comment

I am oppose to ER386 Percussion drilling, a method of excavating holes by repeatedly striking a drill bit, can introduce gas and potential groundwater contamination. Air percussion drilling, for example, can contaminate subsurface sediments with oil from the compressor. Additionally, the process can disrupt groundwater flow and mixing, potentially affecting sample quality and making it difficult to isolate specific aquifer zones. Here's a more detailed explanation: 1. Gas Pollution: Air Percussion: This type of drilling uses compressed air to propel drill cuttings. While efficient for some tasks, the air stream can carry contaminants, including oil from the compressor, down into the subsurface. These contaminants can then pollute the groundwater or soil. Drill Fluid: Other drilling fluids, like water or mud, also have the potential to introduce contaminants, including drilling fluid additives. 2. Groundwater Contamination: Formation Disturbance: The act of drilling itself can disturb the subsurface formations, potentially creating

Response

As per the various emails sent to EIMS (motuoane386@eims.co.za) regarding the Motuoane ER386 EA 12/3/386 Application, between the 22nd of May 2025 and 18th of June 2025. We note several concerns similar to those raised and addressed during the Motuoane ER315 Application which was approved by the Department of Mineral Resources and Energy (DMRE), now known as the Department of Mineral and Petroleum Resources (DMPR). It must be noted that the I&AP was notified about the Motuoane EA 12/3/386 Application process and requested to indicate if they wish to be registered as an I&AP for the project since the initial call to register phase as well multiple times during the Scoping Phase public participation. In addition, the EAP invited the I&AP to the Scoping Phase public meeting and requested several times for a focus group meeting to present the project and highlight the legislated processes, understand and record the I&APs concerns as well as provide adequate / informative responses (where possible). However, to date,

Comments and Responses 1681 Motuoane ER386 EIA

Envir Onmental

new pathways for groundwater flow or mixing between different layers. This can complicate the assessment of groundwater quality and make it harder to understand the hydrogeology of a site. Sample Contamination: Groundwater samples collected during drilling may be affected by the drilling process. Changes in temperature and pressure during sampling can alter key parameters like pH, Eh, dissolved gas content, and the speciation of certain constituents, leading to inaccurate results. Direct Contamination: Drill fluids, including contaminated water, can directly pollute the groundwater if not managed properly. 3. Potential Issues: Sample Quality: Drilling can introduce contaminants into samples, making them unsuitable for certain types of analyses or misrepresenting the true nature of the groundwater. Water Quality: Contaminants from drilling fluids or other sources can alter the chemical characteristics of the aquifer and potentially make the groundwater unsafe for human consumption or other uses. Hydrogeologic Complexity: Disturbing the subsurface can make it difficult to understand the groundwater flow patterns and interactions between different aquifers, potentially impacting water resource management decisions. 4. Mitigation Measures: Proper Drilling Techniques: Using appropriate drilling techniques, including minimizing the use of air percussion and properly managing drilling fluids, can reduce the risk of contamination. Sample Handling and Analysis: Strict procedures for sample handling and analysis are crucial to ensure the accuracy of groundwater quality assessments. Contamination Management: Contaminated drilling fluids should be properly managed and disposed of to prevent further pollution of groundwater and soil. On Thu, May 22, 2025 at 9:04 PM Envir Onmental<oenvir678@gmail.com> wrote: Yes, conventional drilling processes often utilize chemical additives in drilling fluids, also known as drilling mud, to enhance its properties and improve drilling efficiency. These chemicals play a crucial role in various aspects of the drilling operation, including rheological control, fluid loss, and wellbore stabilization. Yes, conventional drilling can lead to groundwater contamination. This occurs through several mechanisms, including the direct discharge of contaminated fluids like drilling muds and wastewater, the potential for leaks or spills during drilling operations, and the introduction of chemicals used in drilling processes into the subsurface Conventional oil and gas drilling can lead to groundwater pollution through various pathways, including well construction issues, surface activities, and the management of waste streams. Contaminants can enter groundwater Conventional drilling in agriculture, often referred to as conventional tillage, involves tilling the soil multiple times before planting to create a seedbed. This can have both positive and negative impacts on soil and crop health. While it can increase yields and control weeds, it can also lead to soil degradation, water pollution, and reduced biodiversity

the I&AP has not registered nor indicated their intention to register as an I&AP for this project. The I&AP has also failed to attend the Scoping Phase public meeting nor avail themselves for a focus group meeting Kindly refer to Table 1 for detailed responses to the comments

Ms Irene Lengau

Date	2025/06/30	Method	Email
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Comment	Response
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Comments and Responses 1681 Motuoane ER386 EIA

Ms Irene Lengau

Good afternoon, ***** I trust you are well. Please find attached the letter requesting to consult with a concerned woman/ interested and affected party for Exploration Right 12/3/315/1B. Kind regards

Good Day Irene, As per our conversation earlier, we would like to notify and invite you to register as an Interested and Affected Party (I&AP) on the Motuoane ER386 EIA 12/3/386 Application within various Farms in Matjhabeng and Moqhaka Local Municipalities, Lejweleputswa and Fezile Dabi District Municipalities, Free State Province, South Africa. As indicated, the project is currently in the Scoping Phase and the Scoping Report has been made available for public review from the 15th of May to the 18th of June (see attached notification). Unfortunately, the scoping phase public meeting was held at Harmonie Primary School in Virginia on the 28th of May. However, there will be another public meeting during the EIA Phase, registered I&APs will be notified in due time of the meeting and availability of the Environmental Impact Assessment Report which will be made available for a minimum of 30-day legislated period. May you kindly provide comments, concerns and/or requests to EIMS Public Participation Team: Contact Person: Alex Msipa EIMS Reference Number: 1681 PASA / DMRE Reference Number: 12/3/386 Postal Address: P.O. Box 2083; Pinegowrie; 2123 Telephone: (011) 789 7170/ Fax: (086) 571 9047 E-mail: motuoane386@eims.co.za Please include the project reference number 1681 in all correspondence. Please feel free to contact the undersigned if you have any queries or concerns.

Date	2025/06/30	Method	Email
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Comment

Email1: Afternoon Sir We are not happy with many things here and we can't rely to correspondences let's meet with you guys or we proceed with OBJECTION Kind regards Concernedw women Email 2: Dear Sir It is clear indication that you have never contacted affected parties and there were NO public participation let me help you the information you need you are the one who must SHOW us and I told you we don't want to prolong this matter lets sit down Kind regards CONCERN WOMAN Email 3: Hi hear me well I have never contacted PASA FOR SWEET YOU DON'T COMPLY WITH MPRDA There are many Faults in this proposal I wanted to show you all your mistakes now you are busy accusing me OR LET RMDEC SOLVE THIS MATTER

Response

Response to Email 1: Good Day***, We confirm receipt of your email and will respond accordingly shortly. In the interim, may you please provide a copy of the Mandate / Agreement and a list of the landowners (name of landowner and property) that Concerned Women represents within the Exploration Right 386 footprint (attached to this email) for future correspondence purposes. Please also indicate where the organization / group is located if a meeting is to be scheduled. Response to Email 2:Good Day, As per the telecommunication on the 5th of June 2025, you had indicated that you are the representative for Concerned Women who are a group of various landowners in the project, please confirm if our understanding is correct? Please note that it is wrong to make an incorrect and misinformed statement that "No public participation was undertaken". Kindly refer to Appendix C of the Scoping Report (website: <https://www.eims.co.za/2025/05/14/1681-motuoane-er386-eia-2/> or hardcopies: Virginia Public Library, Welkom Public Library and Phomolong Public Library) for the public participation undertaken up to the compilation of the Scoping Report which included; • Notifications to Interested and Affected Parties (including the landowners), • Placement of site notices in and around the application area; • Newspaper advertisement in the local newspaper (Vista); and • Advertisement in the government gazette. Notifications of the scoping phase public meeting were circulated to registered Interested & Affected Parties (I&APs) and the meeting was held on the 28th of May 2025 at Harmonie Primary School, proof of the meeting and minutes will be made

Comments and Responses 1681 Motuoane ER386 EIA

Ms Irene Lengau

	available during the next phase of the application (Environmental Impact Assessment Phase). Unfortunately, the public participation period for the scoping phase ends on the 18th of June and therefore, although the request for the physical meeting has been noted, a physical meeting may only be scheduled for the EIA Phase public participation period. Alternatively, a virtual meeting can be arranged on or before the 18th of June if you are fine with that? To date, we have only received a request for a meeting, we have not received any comments and/or concerns regarding the scoping report and/or application. Kindly be reminded to provide comments / concerns on the Scoping Report or application by no later than the 18th of June 2025 for us to capture and respond to accordingly as well as submit to the Petroleum Agency South Africa (PASA) and the Department of Mineral and Petroleum Resources (DMPR) for consideration when making a decision on the application and the report. Please feel free to contact the undersigned if you have any queries or concerns. Email 3: Good Day Irene, Kindly note that Concerned Women will be invited to the public meeting during the EIA Phase.
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Ms Khazi Mashamaite

Date	2025/06/19	Method	Email	
Comment	<div>Hi ***** Please see attached our comments. Please note that we are supplementing these and will send a revised document during the course of today. Thank you.</div> <div>_____ Hi ***** Apologies, we will not be supplementing the comments. Thank you</div>			Response
				<div>Dear: ***** RE: COMMENTS BY HARMONY GOLD MINING COMPANY LIMITED IN TERMS OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 IN RESPECT OF THE SCOPING REPORT SUBMITTED ON BEHALF OF MOTUOANE ENERGY (PTY) LTD FOR AN ENVIRONMENTAL AUTHORISATION (DFFE REF: 12/3/386 EA) REGARDING AN EXPLORATION RIGHT APPLICATION (PASA REF: 386 ER) ON VARIOUS FARMS, SITUATED IN THE MATJHABENG AND MOQHAKA LOCAL MUNICIPALITIES AND THE LEJWELEPUTSWA AND THE FEZILE DABI DISTRICT MUNICIPALITIES, FREE STATE PROVINCE, SOUTH AFRICA We acknowledge the comments submitted to EIMS on the 18th of June with reference to the 12/3/386 EA Application. We further thank you for your contribution to the process. Kindly refer to Table 8 below of comments received and responses thereof for your attention.</div>

Thea Oberholzer

Date	2025/04/17	Method	Email	
Comment				Response
Good day Please register myself as an I&AP to the Motuoane Energy EIA process as published in notice 3129 of 2025. Please send me all relevant PPP documentation.				Good day, We acknowledge receipt of your email. We have registered you as an Interested & Affected Party (I&AP) and you will continue to receive communications regarding the proposed project. Please attached, the project’s Background Information Document. Please feel free to

Comments and Responses 1681 Motuoane ER386 EIA

Thea Oberholzer

contact us should you have any further comments/queries regarding the project.

Mr Luka Van Der Merwe

Date 2025/03/27 Method Email

Comment

My name is ***** and I would like to apply to be a I&AP on behalf of Red Rocket with regards to the EA process with reference number 1681. Our reason for registering as an I&AP is due to the fact that the exploration area overlaps with one of our projects, a Solar PV park with granted EA, reference number: 14/12/16/3/3/2/2322. Feel free to let me know if you require more information. Please confirm receipt of this email. Thank you, Kind Regards

Response

As previously communicated, you have been added to the I&AP database for the Motuoane ER386 Application. We do note that the ER Footprint overlaps with the DFFE approved Solar Park but does not overlap with the planned target areas as per below image. Has Red Rocket perhaps already acquired the land use rights (Section 53 of the MPRDA) for the solar park?

Date 2025/03/27 Method Email

Comment

My name is ***** and I would like to apply to be a I&AP on behalf of Red Rocket with regards to the EA process with reference number 1681. Our reason for registering as an I&AP is due to the fact that the exploration area overlaps with one of our projects, a Solar PV park with granted EA, reference number: 14/12/16/3/3/2/2322. Feel free to let me know if you require more information. Please confirm receipt of this email. Thank you, Kind Regards

Response

Good day, We acknowledge receipt of your email below. We have registered you as an Interested & Affected Party (I&AP), and you will continue to receive communications regarding the proposed project. Your email has been forwarded to the EAP for a more detailed response. Please feel free to contact us should you have any further comments/queries regarding the project.

Date 2025/03/31 Method Email

Comment

Good day Vukosi, Yes, we have the land rights (sec 53) approval, kindly find attached.

Response

Received with thanks. We will advise Motuoane Energy Pty Ltd and revert back. They may engage with you directly regarding potential coexisting arrangements if necessary as currently there are no planned exploration activities within the Solar Park area. Kind regards, Vukosi Mabunda

Tshele Monyobo

Date 2025/03/27 Method Email

Comment

Dear **** I received your email and I want you to inform me on what should I do because last year I sent you an email on that side of Road R73. I don't know how far are you on that side because I saw your detectors on that side. On that R73 when I arrived there I will only goes to where place where gas is because it will be for exploring for [Gas] which is the main source of

Response

Good day, We acknowledge receipt of the comments as indicated in the email below. We have registered you as an Interested & Affected Party (I&AP) and you will continue to receive communications regarding the proposed project. Please feel free to contact us should you have any further comments/queries regarding the project.

Tshele Monyobo

what you are looking for IF you would like to contact me regarding more info you can contact me from Monday to Friday at 12:00 because from morning from 07:00am up untill 11:00am I will be busy during that time.