

# Comments and Responses 1590 Thungela Lephallale CBM EIA

Mr Paul Lado

Date 2023/11/03 Method Email

## Comment

Your e-mail below refers. Could you register me as an IAP for this project?

## Response

Thank you for your email. We can confirm that your details have been included in our I&AP database.

Date 2023/11/06 Method Email

## Comment

My e-mail dated 3 November 2023 refers. Could you kindly confirm that I have been registered as an Interested and Affected Party for the Thungela Lephallale CBM Project? Could you also provide me with copies of relevant documents such as the Environmental Impact Assessment and specialist studies, inter alia?

## Response

At present, we have made the project's Background Information Document available on our website. This can be accessed at: [www.eims.co.za/public-participation](http://www.eims.co.za/public-participation) Attached to this email is the initial notification letter which was sent out as part of the call to register for this project. Other documentation will be made available for public review in due course. Should you have any further queries, please let me know.

Date 2023/11/06 Method Email

## Comment

My e-mail dated 3 November 2023 refers. Could you kindly confirm that I have been registered as an Interested and Affected Party for the Thungela Lephallale CBM Project? Could you also provide me with copies of relevant documents such as the Environmental Impact Assessment and specialist studies, inter alia?

## Response

I&AP noted response.

Date 2025/02/07 Method Email

## Comment

I trust that this e-mail finds you well. I write to enquire if there is any update in re the Lephallale CBM project.

## Response

I hope you're well. At this point, there are no updates regarding this project. We will keep you informed if there are any changes in this regard.

Date 2025/04/03 Method Email

## Comment

Just a quick query about the EIA for the Lephallale CBM project. Has a Scoping Report or EIA been compiled already – we have heard at a conference that an EIA has been compiled but have not received notification thereof (if it has been compiled).

## Response

Good afternoon Paul, Further to your below query, kindly note that the project is currently on hold. As a registered I&AP, you will be notified in due course of any opportunities to comment on reports, etc.

Date 2026/03/05 Method Email

# Comments and Responses 1590 Thungela Lephalele CBM EIA

Mr Paul Lado

Comment	Response
Good morning Kindly find attached hereto a letter for your attention. We look forward to your response herein. Thanking you,	Good day Mr Lado, Please find attached a letter in response to your previous communication. We hope you find everything in order. For any further assistance, queries, and/or concerns, please do not hesitate to contact us.

Date 2026/03/05 Method Email

Comment	Response
<p>Dear Sir/Madam FAILURE TO NOTIFY REGISTERED IAPS: THUNGELA LEPHALALE COAL BED METHANE PROJECT 1. We refer to the notice dated 27 February 2026 regarding the application by Thungela Operations Proprietary Limited for a Production Right for coal bed methane in the Lephalele Local Municipality, Limpopo Province. 2. We note with serious concern that, despite being registered interested and affected parties (I&amp;APs) in respect of this project, we were not notified of the release of the Scoping Report, Environmental Impact Assessment (EIA) Report, or any other associated environmental assessment documentation forming part of this application. Nor were we provided with copies of such documents. 3. This omission is particularly concerning in light of our previous correspondences with EIMS. In an email from Dr. Lucien James to us dated 19 May 2025, it was stated that "...Further to your below query, kindly note that the project is currently on hold. As a registered I&amp;AP, you will be notified in due course of any opportunities to comment on reports, etc." A copy of the e-mail correspondence is attached hereto. 4. Notwithstanding the fact that we are registered I&amp;APs, it appears that the environmental assessment process has proceeded without any notification being provided to us. This constitutes a clear failure to notify registered I&amp;APs of the availability of environmental assessment reports and an opportunity to comment thereon, as required by the Environmental Impact Assessment Regulations, 2014 promulgated under the National Environmental Management Act, 1998. Such a failure undermines the lawfulness and integrity of the public participation process. 5. We further note that the project website referenced in the notification does not provide access to the Scoping Report, Environmental Impact Assessment Report, Environmental Management Programme, or supporting specialist studies. This is inconsistent with the requirement that environmental assessment documentation be made reasonably accessible to interested and affected parties during the public participation process. 6. In the circumstances, the failure to notify registered I&amp;APs constitutes a breach of the prescribed public participation requirements. Furthermore, the continued failure to make the relevant environmental assessment documentation available on the project website, as required in order to ensure reasonable access to such information, constitutes an ongoing violation of these requirements. 7. We accordingly request immediate access to all relevant environmental assessment reports and supporting documentation, and that these documents be made available on the project website without delay to ensure access to other I&amp;APs. We</p>	<p>RE: THUNGELA LEPHALALE COAL BED METHANE PROJECT – RESPONSE TO LETTER DATED 05 MARCH 2026 Dear Mr Lado, We refer to your letter dated 05 March 2026 regarding the Thungela Lephalele Coal Bed Methane Project. At the outset, it is important to clarify that the notice dated 27 February 2026 to which you refer relates to an application for a Production Right submitted to the Petroleum Agency of South Africa in terms of the Mineral and Petroleum Resources Development Act (MPRDA – Act 28 of 2002). The aforementioned notice does not relate to the Environmental Authorisation (EA) application process being undertaken by Environmental Impact Management Services (EIMS) in terms of the National Environmental Management Act and the EIA Regulations, 2014. As previously communicated to you in our correspondence of 19 May 2025, the Environmental Impact Assessment (EIA) process associated with the EA application was on hold pending submission of the Production Right application by Thungela. Consequently, no Scoping Report, EIA Report, Environmental Management Programme, or associated specialist studies have been released for public review as part of the EA process. In light of the above, the concerns raised in your letter regarding an alleged failure to notify registered Interested and Affected Parties (I&amp;APs) of the availability of such reports are based on an incorrect premise. As no environmental assessment documentation has been released as part of the EA process, the public participation requirements relating to the circulation of such reports have not yet arisen. For the avoidance of doubt, all registered I&amp;APs, including the Centre for Environmental Rights, remain on the project database. The EA application process will commence shortly and all registered I&amp;APs will be notified in accordance with the applicable legislative requirements. We trust that this clarifies the status of the EA process and the distinction between the Production Right application and the environmental authorisation process being managed by EIMS. Yours sincerely, Dr Lucien N. James Environmental Impact Management Services (Pty) Ltd</p>

# Comments and Responses 1590 Thungela Lephallale CBM EIA

Mr Paul Lado

reserve all of our rights in relation to the failure to notify registered I&APs at the appropriate stage of the process. 8. We look forward to your urgent response. Yours faithfully CENTRE FOR ENVIRONMENTAL RIGHTS

Date 2026/03/20 Method Email

Comment

Dear Dr James THUNGELA LEPHALALE COAL BED METHAN PROJECT IAP PARTICIPATION 1. We refer to your letter dated 17 March 2026 regarding the Thungela Lephallale Coal Bed Methane Project. 2. We note your clarification that the notice of 27 February 2026 relates to an application for a Production Right in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA), and that the Environmental Authorisation (EA) process under the National Environmental Management Act, 1998 (NEMA) has not yet commenced. 3. We further note your position that, as no scoping or EIA documentation has been released, the public participation requirements associated with the EA process have not yet been triggered. We further note, with thanks, your assurance that all IAPs will be notified once the EA application process begins. 4. While the distinction between the EA application process and the Production Right application process is appreciated, we consider it important to note that the MPRDA imposes independent consultation obligations in respect of applications for Production Rights. In particular, once an application has been accepted in terms of section 83(2) of the MPRDA, the applicant is required to consult with IAPs in terms of section 83(4). This obligation arises irrespective of, and in addition to, the public participation requirements under NEMA's EIA process. 5. We thus look forward to being notified and consulted, along with other IAPs, should the Production Right application be accepted by PASA in terms of section 83(2) of the MPRDA. 6. In addition, we request an indication of whether you would be able to provide us with copies of the Exploration Right as well as the EIA and EA associated therewith. 7. We are thankful for your correspondence and assurances in this process. 8. We trust that the above is in order and look forward to your response. Yours faithfully, CENTRE FOR ENVIRONMENTAL RIGHTS

Response

Email was acknowledged.

Date 2026/03/20 Method Email

Comment

Good afternoon Thank you for this notification. Just to confirm the list of IAPs from CER, could you add any of the below e-mails that aren't already on your list: \*\*\* Thanking you Paul (Wani)

Response

Good day Paul, Your request has been noted, and the database will be updated accordingly. For anything further, please do not hesitate to contact us.

Date 2026/04/07 Method Email

## Comments and Responses 1590 Thungela Lephallale CBM EIA

### Mr Paul Lado

#### Comment

Good evening I trust that you are well. I wanted to enquire if the EIA documents are available as yet? If so, could you provide them to me? Thanking you Paul (Wani)

#### Response

Good day Paul, Thank you for your email. Please note that the Scoping Report has not been published for public review and comment yet. You are on our database as an I&AP; therefore, you will be notified when the report has been published. For anything further, please do not hesitate to contact us. Kind regards,

### Lelani Claassen

Date 2023/11/09 Method Email

#### Comment

Kindly register me as an I&AP for the Thungela Resources Coal Bed Methane Production Project in the Lephallale Municipality, per attached notice.

#### Response

Thank you for your e-mail. We can confirm that your details have been included in our database.

### Ms Francina Marapong

Date 2026/03/20 Method Email

#### Comment

Good day Waterberg Women Advocacy Organisation is interested to attend the meeting Looking forward hearing from you soon Best WWAO

#### Response

Good day, Please note that the public meeting for this proposed project has not yet been scheduled. You have been added onto our I&AP Database. You will receive all project related notifications going forward. For any further comments and/or queries, please do not hesitate to contact us. Kind regards, EIMS Public Participation Team

### Mr Sityhilelo Ngcatsha

Date 2023/11/16 Method Email

#### Comment

Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: <https://sahris.sahra.org.za/>. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions. Please create an application on SAHRIS and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA. Please note that a fee is required as from 1 January 2023 for all development applications submitted on SAHRIS. Please see the following

#### Response

Comment recorded and SAHRIS case started as advised.

# Comments and Responses 1590 Thungela Lephalale CBM EIA

Mr Sityhilelo Ngcatsha

link: <https://sahris.org.za/help> and pay the required amount of R2000 for each section 38(8) development application. Please upload the proof of payment (PoP) to the respective development application case. Once all documents including all appendices and the PoP are uploaded to the case application. Please ensure that the status of the case is changed from 'DRAFT' to 'SUBMITTED' and ensure that all documents produced as part of the EA process are submitted as part of the application.

Mr BJM (Tienie) Nel

Date 2024/01/07 Method Questionnaire

Comment

Word u direk deur die projek geaffekteer? 1. Waterbesoedeling, 2. Boor aktiwiteite, toegang tot eiendom Is u 'n gebruiker van die aansoek area of direk aangrensende gebiede? Aangrensende - trofeejagplase Skrikvoorby en Makoupan. Is u bewus van enige stamowerhede, inheemse volke of etniese en kultureel...? Nee Is jy bewus van enige ander belangehebbendes wat in kennis gestel/betrek moet word? Alle aangrensende buurplase en eienaars. Kan u asseblief vir ons 'n hoevlakbeskrywing gee van die aspekte van die omgewing waarop die projek direk....? Trofeejag area - hoofsaaklik deur buitelande jagters Is u bewus van enige ander aktiwiteite (huidige of voorgestelde) binne, of aangrensend aan die toepassingsarea wat relevant kan wees vir die voorgestelde projek? Nee Is jy bewus van enige kultuur van erfenishulpbronne...? Nee Beskryf asseblief enige bio-fisiese en/of sosio-ekonomiese impakte wat...? Nee Het jy enige ander spesifieke bekommernisse, kommentaar...? 1. Waterbesoedeling - boorgate 2. Nuwe paaie en toegangsvretes 3. Toesteming van mense 4. Nuwe kraglyne en pyplyne 5. Gebruik van Deelkraal pad deur swaar voertuie

Response

Confirmation of receipt sent to I&AP and comments recorded in report. See full questionnaire attached in Correspondence Document.

Date 2024/01/07 Method Questionnaire

Comment

Word u direk deur die projek geaffekteer? Ja want ons lewe al meer as vyftig jaar van die plaas wat onself toegespan en wild in gesit het. Die plaas is 'n jagplaas en word deur geweldig geaffekteer. Is u 'n gebruiker van die aansoek area of direk aangrensende gebiede? Ja Is u bewus van enige gemeenskappe/organisasies/gemeenskapsgroepe ens.... Nee Is u bewus van enige stamowerhede, inheemse volke of etniese en kultureel...? Nee Is jy bewus van enige ander belangehebbendes wat in kennis gestel/betrek moet word? Nee Kan u asseblief vir ons 'n hoevlakbeskrywing gee van die aspekte van die omgewing waarop die projek direk....? reeds gemeld

Response

Confirmation of receipt sent to I&AP and comments recorded in report. See full questionnaire attached in Correspondence Document.

# Comments and Responses 1590 Thungela Lephalale CBM EIA

Mr Herman de Lange

Date 2023/12/15 Method Email

## Comment

Word u direk deur die projek geaffekteer? Plaas Knapdaar 407LQ, aangrensend aan "Projek plase" Is u 'n gebruiker van die aansoek area of direk aangrensende gebiede? Indien wel, beskryf asseblief jou gebruik van die aansoek area. Aansoek Area Direk aangrensend.Hoofsaaklik Bees/Vee en wid boerdery. Gebruik D41 pad.Gemeenskaplik met projek. Gebruik selfde "Eskomkrag toevoeryn"Beperkte krag beskikbaarheid". Ondergrondse water gebruik.(Boorgate) Is u bewus van enige gemeenskappe/organisasies/gemeenskapsgroepe ens. wat binne die aansoek area funksioneer wat ingelig moet word? Verskaf asseblief besonderhede en indien moontlik kontakbesonderhede? Nee. Is u bewus van enige stamowerhede, inheemse volke of etniese en kultureel verskillende groepe wat deur bogenoemde projek geraak kan word? Verskaf asseblief besonderhede en moontlike kontakbesonderhede? Nee, alleen familie eienaars van die begin af. Is jy bewus van enige ander belanghebbendes wat in kennis gestel/betrek moet word? Verskaf asseblief besonderhede en moontlike kontakbesonderhede? Nee Kan u asseblief vir ons 'n hoëvlakbeskrywing gee van die aspekte van die omgewing waarop die projek direk of indirek geraak kan word? (insluitend gebruike soos visvang, skeepvaart, mynbou; topografiese kenmerke; Infrastruktuur; sensitiewe flora/fauna) Skietbaan +1000m Jag (Plaaslik en buitelanders) Skoon en volume beskikbaarheid van water.Watervlak word geneem, water toevoer na boorgate het gedaal Dalk kan Anglo water aan aangrensende plase voorsien.Onnatuurlike verhoging van roofdiere/ Lintwurms Is u bewus van enige ander aktiwiteite (huidige of voorgestelde) binne, of aangrensend aan die toepassingsarea wat relevant kan wees vir die voorgestelde projek? Sekuriteit van boere en werkers. Pleit vir 24uur/dag toegangs beheer op albei toegange na D41 pad(Deelkraal pad) D41 pad nie gebou vir mynbou nie.(Since June2009 "Anglo is looking into ways of working with the Department to ensure that the road is in a safe condition")Hiervan het niks gekom nie.Pad is dalk veilig op sekere plekke teen 10km/u,maar nie met sleepwaens waarmee Boere hulle vee vervoer nie.Anglo gebruik ons pad vir mynbou en kruip weg agter die departement.Swaar voertuie het hierdie pad totaal beskadig. Is jy bewus van enige kultuur van erfenishulpbronne (insluitend ontasbare hulpbronne) binne die toepassingsgebied en omgewing? Verskaf asseblief detail? Nee Het jy enige ander spesifieke bekommernisse, kommentaar of besware teen die voorgestelde projek? Indien wel, kan u asseblief vir ons inligting verskaf? Devaliasie van grondwaarde.(Mynbou aktiwiteite /Toeloop van vreemdes/Onnatuurlike,geweldige verhoging in roofdier konsentrasie)Aangrensende plase kan nie gebruik word vir ekonomiese boerdery doeleindes nie. Geen koper sal hierdie plase koop vir boerdery nie.(Vandat Anglo hier begin het, het vee en wild verliese op my plaas verhoog van 2 of 3 diere p/jaar tot meer as 40 diere p/j.) Verhoogde risiko vir plaas aanvalle. Verhoogde risiko vir diefstal (ingesluit wild en vee)

## Response

Confirmation of receipt sent to I&AP and comments recorded in report. See full questionnaire attached in Correspondence Document.

# Comments and Responses 1590 Thungela Lephalale CBM EIA

## Mr Herman de Lange

Verhoogde toestroming van vreemdes.(Werk soekers) "History" het ons geleer;"Anglo takes these matters seriously" maar kom omtrent nooit terug na ons toe nie.(Soos op notule van vergadering met Boere) Arbeids onrus wat deel van die lewe is,hoe gaan Anglo ons en ons eiendom beskerm? Plase brand maklik af.Onlangs het ons Boere in die nag gehelp om "Anglo eiendom" teen vuur te probeer beskerm.Plaaslike span het hulle beste gegee,maar met meer toerusting deur Boere verskaf was skade steedsnorm.

## Riaan Robbeson

**Date** 2026/03/22 **Method** Email

### Comment

Good morning Please find attached the registration form as requested. We look forward to communication with regards to the project. Kind regards,

### Response

Good day Riaan, Thank you for the email, please note that your correspondence has been recorded. Should a response be drafted by the EAP, you will receive communication.

**Date** 2026/03/22 **Method** Email

### Comment

Title : Mr Full name and surname: Riaan A.J Robbeson Organisation and/or local community: Bathusi Environmental Consulting cc Are you directly impacted by the project? No Please can you provide us with a high-level description of the aspects of the environment upon which the project may directly or indirectly be impacted? (including uses such as fishing, shipping, mining; topographical features; Infrastructure; sensitive flora/fauna) Ecology and terrestrial biodiversity, sensitive and range restricted habitat types, plant and animal species of conservation concern, provincially and nationally protected species.

### Response

Comment sheet was noted and recorded.

## Mr Jurgen Roets

**Date** 2023/11/16 **Method** Telephone

### Comment

I&AP requested Stakeholder Information Sheet as well as registration.

### Response

See Conversation record attached

**Date** 2023/11/16 **Method** Telephone

### Comment

I&AP requested Stakeholder Information Sheet as well as registration.

### Response

Thank you for your telephone call. As requested, please see the Stakeholder Information Sheet attached for your interest. I have attached English and Afrikaans versions. I've also attached our

# Comments and Responses 1590 Thungela Lephalale CBM EIA

Mr Jurgen Roets

notification letter which provides more specific detail about the project. I have also included a link to our website which includes more information: <https://www.eims.co.za/2023/11/02/1590-thungela-lephalale-coal-bed-methane-eia/>

Date 2023/11/21 Method Email

## Comment

I hope this email finds you well. I am writing to kindly request the stakeholder registration forms and the necessary steps to follow regarding the Thungela Lephalale CBM project. During our phone conversation last week on November 16, 2023, you graciously offered to send these documents to me via email. Additionally, I would like to inform you that we own the neighbouring farm to their current and active 5 spot - Withoutpan farm. Thank you in advance for your kind assistance. I appreciate your time and attention to this matter. Should you have any questions or require any further information, please feel free to contact me. I eagerly await your response.

## Response

Thank you for your email. Please see the below email I sent to your Gmail account as requested telephonically the other day. If it is okay with you, I will include this email address in our I&AP database. Thank you for your continued interest in the participation opportunity for this project.

Mandla Xaba

Date 2026/03/13 Method Email

## Comment

Attention Mbali As a follow up from our conversation, pls add the following people to the list 1- Mandla Xaba – \*\*\* 2- Khakhathi Munyai – \*\*\* 3- Siyabonga Mpontshana – \*\*\* 4- Marcel Dippenaar- \*\*\* 5- Thato Napo – \*\*\* Regards

## Response

Good day Mandla, Please note that you and the colleagues you have indicated have been added onto our database as an I&AP. You will receive all project related notifications going forward. For anything further, please do not hesitate to contact us.

Date 2026/03/20 Method Email

## Comment

Attention Mbali Tshabalala Regarding above-mentioned reference: Khongoni Haaskraal Coal, holds a coal mining right over Haaskraal 221 LQ, [mining right available on request] which is part of the overall area upon which this CBM exploration is envisaged. Khongoni Haaskraal Coal shareholders object to this initiative as it will sterilize its coal asset, valued @ ~R2bn for the life of mine. Regards Mandla Xaba

## Response

Good day Mandla, Thank you for your email. Please note that your comments have been noted and forwarded to the relevant EAP, should there be a response in this regard it will be forwarded to you.

Date 2026/03/20 Method Email

## Comment

Attention Mbali Tshabalala Regarding above-mentioned reference: Khongoni Haaskraal Coal,

## Response

Good day Mandla, As stated below, the message was forwarded to the EAP, and the response is



# Comments and Responses 1590 Thungela Lephalale CBM EIA

## Mandla Xaba

holds a coal mining right over Haaskraal 221 LQ, [mining right available on request] which is part of the overall area upon which this CBM exploration is envisaged. Khongoni Haaskraal Coal shareholders object to this initiative as it will sterilize its coal asset, valued @ ~R2bn for the life of mine. Regards Mandla Xaba

as follows: Could you please provide us with a copy of the said mining right. Additionally, could you please forward a kmz file indicating the boundaries of the mining right.

Date 2026/03/23 Method Email

### Comment

Afternoon Mbali Find Khongoni Haaskraal Coal Mining Right attached, Annexure on p13 detailing boundaries of the farm upon which mining right is held. Mandla

### Response

Good day Mandla, Thank you for the information provided. Please note that the EAP is still going through the document, a response will be forwarded to you as soon as it is made available to us. For any comments and/or queries in the meantime, please do not hesitate to contact us.

## Mokgadi Dikgale

Date 2023/11/21 Method Email

### Comment

Please note that we would like to register as Interested Parties for the Thungela Lephalale CBM EIA Ref 1590. Please add the following details in your database:

### Response

Thank you for your email. We can confirm that the provided details have been added to our I&AP database for this project.

## Mr Manie Elistroh

Date 2024/06/07 Method Email

### Comment

Phone call received from I&AP requesting information about the project.

### Response

Thank you for your enquiry this morning. As discussed, herewith the Background Information Document (BID) for the proposed project. I've also attached the Afrikaans version for ease of reference. This project requires various environmental licences and the application process we are undertaking will take another year or so. Should you wish to be registered as an Interested and/or Affected Party, please advise and we will include your contact details on our database for future notifications when more information is available. Feel free to contact me should you have any further queries in this regard. Thanks again and have a great weekend.

## Mr Johannes Daniel Nel

Date 2024/02/22 Method Questionnaire

### Comment

### Response

# Comments and Responses 1590 Thungela Lephalale CBM EIA

## Mr Johannes Daniel Nel

Word u direk deur die projek geaffekteer? Ja. Ons toegang tot die plaas in via Deelkraal pad ons is aangrensend aan Anglo. Is u 'n gebruiker van die aansoek area of direk aangrensende gebiede? Indien wel, beskryf asseblief jou gebruik van die aansoek area. Ja. Ek boer op Witwater met vee en wild.

I&AP was thanked for the comments and concerns raised. The comments raised here were considered as the concerns of landowners.

## Mike Davies

Date 2026/03/20 Method Email

### Comment

Hi - please register as IAP Thanks

### Response

Good day Mike, Thank you for your email. Please note that you have been added onto our database and an I&AP, you will receive all further communication going forward. For any comment and/or queries, please do not hesitate to contact us.

## Izak Nel

Date 2026/02/27 Method Email

### Comment

Afternoon Dr. James, Please find attached our application to register as an Interested and Affected Party (I&AP), And confirmation of our intend to attend the meeting on Tuesday, 3 March '26 at 10:00 With thanks,

### Response

Good day, Please note that you have been added onto our database and an I&AP, you will receive all project related communication going forward. For anything further, please do not hesitate to contact us.

## Ms Claudia Pepler

Date 2023/11/06 Method Email

### Comment

PLEASE FIND ATTACHED STAKEHOLDER REGISTRATION FORM

### Response

Thank you for your e-mail. We can confirm that your details have been included in our I&AP database.

Date 2023/11/06 Method Email

### Comment

Word u direk deur die projek geaffekteer? Ja Indien wel, beskryf hoe? Bestuur watergebruik uit Mogol Rivier Kan u vir ons 'n hoevlakbeskryfwing gee van die aspekte van die omgewing waarop die projek direk of indirek geraak kan word? Slegs toegelate kwota water uit Mogol mag gebruik word

### Response

Stakeholder Form accepted and I&AP was registered. Comments were recorded and an email acknowledgement of receipt was sent to I&AP. (See Stakeholder Form)

# Comments and Responses 1590 Thungela Lephallale CBM EIA

Mr Isaac Nel

Date 2024/06/25 Method Telephone

Comment	Response
I&AP is an adjacent landowner. The I&AP expressed concern over the PR area which overlaps with the property he has recently purchased. The landowner requested if he could still submit comments (See Conversation Record for details).	The landowner’s concerns were noted, and he was encouraged to send through comments via the e-mail channel of the project, i.e. lcbm@eims.co.za. Further, the landowner was informed that the project’s call to register commenced in 2023, however, the Scoping Report has not yet been made available for public review.

Lucy Pitse

Date 2023/11/13 Method Email

Comment	Response
Registration as AIP	Thank you for your email. We can confirm that your details have been registered in our I&AP Database.

Antonie Coetzee

Date 2026/03/26 Method Email

Comment	Response
REGISTRATION AS I&AP AND FORMAL REQUEST FOR TRAFFIC AND INFRASTRUCTURE IMPACT DISCLOSURE THUNGELA CBM PROJECT (EIMS REF: 1590) I hereby formally register as an Interested and Affected Party (I&AP) in respect of the proposed Coal Bed Methane (CBM) Production Project by Thungela Operations (Pty) Ltd. 1. Property Details 1 Property: Portion 19 of Vucht 436 LQ 2 Location: Approximately 300m from Beska Road, Lephallale Local Municipality 2. Basis of Interest and Impact My property is located immediately adjacent to the broader project area and is directly exposed to potential transport routes and impacts associated with LNG road distribution over a 30-year period. At present, there is no heavy vehicle traffic in the area. The introduction of this project represents a material change including noise, dust, road degradation, and safety risks. Additional Environmental Impact Concerns 1 Dust generation arising from increased heavy vehicle movement along Beska Road, affecting air quality and property conditions 2 Noise impacts, including disturbance during early morning, late evening, or continuous transport operations 3 Road degradation, resulting in deterioration of current road conditions and increased maintenance burden These impacts represent a measurable deviation from current baseline conditions, where no heavy vehicle activity is presently observed. 3. Formal Information Request 3.1 Traffic and Transport 1 Full Traffic Impact Assessment (TIA) 2 Proposed haulage routes (mapped) 3 Estimated daily heavy vehicle volumes	Dear Antonie Coetzee. Thank you for your submission including comments/concerns related to traffic, roads, dust and noise. As requested, we have formally recorded your details in our database for further communications and opportunities to participate (further documentation reviews and comment opportunities). Kindly note that as part of the EIA Application process, we will appoint various specialists in the fields of Traffic, Noise, Air Quality (including dust) amongst other specialist disciplines. Your concerns and property location will be shared with the relevant specialists to ensure that their studies take into consideration these potential impacts. With respect to the timeframe for completion of these studies, kindly note that the EIA application process comprises a Scoping Phase followed by an EIA phase. The Scoping Phase report typically identifies potential impacts and provides preliminary mitigation measures. This is then followed by a detailed assessment in the EIA Phase during which the specialist studies are completed and included in the reports released for public review. We are currently in the initial Call to Register phase where we solicit requests from I&APs to be registered and to provide comments/concerns which we will then investigate further. As such, we will not be in a position to provide the requested specialist studies within 7 days of your below correspondence as per the above EIA process description. For further detail on the EIA Application process, kindly refer to the attached BID.

# Comments and Responses 1590 Thungela Lephallale CBM EIA

Antonie Coetzee

4 Road upgrade and maintenance responsibilities 5 Dust suppression and traffic control measures 3.2 Infrastructure Routing 1 Pipeline corridors or infrastructure routes near Portion 19 of Vucht 436 LQ 4. Position on Impact Any introduction of heavy vehicle traffic near my property will constitute a material adverse impact requiring mitigation measures, road maintenance obligations, and potential compensation. 5. Procedural Requirement Please provide the requested information within 7 (seven) calendar days. Failure to do so will be raised as a procedural deficiency in the public participation process. 6. Communication All future correspondence, reports, and notices must be provided to me as a registered I&AP. Yours faithfully,

Date 2026/03/31 Method Email

## Comment

Request for Cadastral Information – PR Area (224 Farm Portions) Thungela CBM Project (EIMS Ref: 1590) Dear Sir / Madam / EIMS PP Team, I refer to the Background Information Document (BID) issued in respect of the proposed Coal Bed Methane (CBM) Project by Thungela Operations (Pty) Ltd, which indicates that the Production Right (PR) application area comprises approximately 224 farm portions. As a registered Interested and Affected Party (I&AP), I would like to better understand the spatial extent of the project area. Information Request I kindly request a schedule of the farm portions included within the PR area, presented in a clear tabular format similar to the structured presentation used in the BID. Suggested Table Format Farm Name Portion Number Registration Division Title Deed Number Included in EA Phase (Yes/No) Additional (if available) If possible, it would also be helpful to receive: • A locality map or overlay indicating the farm portions within the PR area • Identification of the subset of farms included in the current EA application phase This information will assist in understanding the project footprint and in facilitating informed participation in the ongoing process. Yours faithfully Antonie Coetzee

## Response

Good morning Antonie. Apologies for the delayed response. Please find attached the list of farm portions (property list) included in the PR application as well as a map (Reg 2.2 Plan) showing the spatial extent of the farm portions with the PR boundary indicated on the map. While the PR covers the 224 farm portions, the proposed infrastructure being applied for under the Phase 1 production activities covers 20 farm portions. Attached the various google earth kmz files for ease of reference. Kindly note that the Environmental Scoping Report will be made available later this week for comment for a period of 30 days as required. You have been registered as an I&AP and will be formally notified of the availability of the report, where to access the report and the upcoming public meetings to be undertaken. We trust you find this in order however please don't hesitate to contact us if you have any further queries or comments.

Willie Kekae

Date 2026/03/24 Method Email

## Comment

Sir/madam I'm Willie from lephallale with id \*\*\* I'm interested in your project Regards Willie

## Response

Good day Willie, Thank you for your email. Please note that you have been added onto our database as an I&AP, you will receive all project related notifications going forward. For anything further, please do not hesitate to contact us.

Ms Judy Bell

## Comments and Responses 1590 Thungela Lephalale CBM EIA

### Ms Judy Bell

Date 2026/02/27 Method Email

#### Comment

Hi Please register me for this project. Thanks,

#### Response

Good day, Please note that you have been added onto our database as an I&AP and you will receive all project related communication going forward. Please do not hesitate to contact us for anything further.

Date 2026/03/18 Method Email

#### Comment

That took a while!!! I see there was a presentation today that I missed. Please send me a copy. Thanks,

#### Response

Good day Judy, Apologies for the delay in response to you request to register as an I&AP. Please note that EIMS is not aware of any presentation that took place on Wednesday 18th of March 2026. Could you please clarify where and what time this event took place?

### Mr Riaan Robbeson

Date 2023/11/07 Method Email

#### Comment

Please find attached the registration form for AIP for the Thungela project

#### Response

Thank you for your e-mail. We can confirm that your details have been included in our I&AP database.

### Mthobisi Ngcobo

Date 2023/12/01 Method Email

#### Comment

Please note that the Department hereby acknowledge the receipt of the notice 1590/lj/LW. You can share your information via email to avoid delays in accessing the documents.

#### Response

Comment received and details of department added to database for further communication via email.

### Kobus Dippenaar

Date 2026/03/27 Method Email

#### Comment

Good Morning Mbali, I am doing prospecting work for a client on the farm Moordrift just outside Lephalale and noticed the announcement that were posted at the gate of the farm. Could you please send an electronic copy to my email so I study it? Thank you Kind Regards

#### Response

Good day Kobus, Thank you for your email. Please find attached the initial call to register letter for this proposed project. Additionally, please find attached the BID for more information on the proposed project. Lastly, could you please indicate if you would like to be added onto our

# Comments and Responses 1590 Thungela Lephalale CBM EIA

Kobus Dippenaar

database as an I&AP in order to get all project related notifications.

Date 2026/03/27 Method Email

Comment

Thank you for the feedback. Please add me to your list of I&AP's Kind Regards Kobus

Response

Good day, Thank you for the confirmation. You have been added onto our database as an I&AP; you will receive all project related notifications going forward. For any further queries and/or concerns, please do not hesitate to contact us.

Mrs Alet Martens

Date 2024/01/03 Method Questionnaire

Comment

Are you directly impacted by the project? Living on impacted farm, making a living from the farm by hunting and shares. Are you a user of the application area or directly adjacent areas? If so, please describe your use of the application area. Living on the farm as well as benefit from its income Are you aware of any communities/organisations/community groups etc which operate within the application area that should be informed? Please provide details and if possible contact details? No Are you aware of any tribal authorities, indigenous peoples, or ethnic and culturally distinct groups that may be affected by the aforementioned project? Please provide details and possible contact details? No Are you aware of any other stakeholders who need to be notified/engaged? Please provide detail and possible contact details? Yes. Forwarded details to them. Please can you provide us with a high-level description of the aspects of the environment upon which the project may directly or indirectly be impacted? (including uses such as fishing, shipping, mining; topographical features; Infrastructure; sensitive flora/fauna) Will have huge impact on flora and fauna as well as on us as owners personally. The value we have to the land is not measurable. It was also inherited. Are you aware of any other activities (current or proposed) within, or adjacent to the application area that may be relevant to the proposed project? Yes. The rest of our farm - as it will be cut in half - will decrease in value. Will limit our hunting activities and our intensive breeding project of exotic game. Are you aware of any cultural of heritage resources (including intangible resources) within the application area and surrounds? Please provide detail? No Please describe any bio-physical and/or socio-economic impacts that you believe should be considered during the study? As above. What a project of this magnitude will do can not be described on 2 pages. Do you have any other specific concerns, comments or objections to the proposed project? If so, could you please provide us with information? - Quality of water decreasing, air quality. - Influx of stock theft and illegal hunting increasing -Huge inconvenience

Response

Confirmation of receipt sent to I&AP and comments recorded in report. See full questionnaire attached in Correspondence Document.

# Comments and Responses 1590 Thungela Lephallale CBM EIA

Mrs Alet Martens

of depreciation of value of property and a once undisturbed bushveld becoming commercial.

Machiel Booyse

Date 2023/11/06 Method Email

Comment

Please add the following 2 persons as I&AP to this project: Machiel Booyse Willem Booyse  
Prospecting holes was drilled on our farm.

Response

Thank you for your email. We can confirm that the provided details have been included in our I&AP database.

Date 2026/03/19 Method Email

Comment

Good day. Please register both me and the email address CCd in this email as an Interested and affected party for the attached project. Regards,

Response

Good day Machiel, Thank you for your email, please note that you and Annaline have been added onto our database as I&APs. You will receive all project related notifications from this point. For anything further, please do not hesitate to contact us.

Ms Filomaine Swanepoel

Date 2026/03/23 Method Email

Comment

Good day, Kindly please find attached my registration as I&AP for the Proposed Thungela Operations (Pty) Ltd Coal Bed Methane Production Project. Kind Regards,

Response

Good day Filomaine, Thank you for your email. Please note that you have been added onto our database as an I&AP. You will receive all project related information going forward. For any further questions and/or queries, please do not hesitate to contact us.

Date 2026/03/23 Method Questionnaire

Comment

Title: Miss Full name and surname: Filomaine Swanepoel Are you directly impacted by the project? Yes. If yes, please describe how? (you are welcome to add additional pages if required. The properties Vooruit 449 LQ, Grootestryd 450LQ and Eendrachtspan 452LQ are owned by Exxaro Coal (Pty) Ltd. Are you a user of the application area or directly adjacent areas? If so, please describe your use of the application area. Currently the Exxaro Land Managment operational are is situated on Grootestryd 450LQ as the Eendrachtspan area houses some of the Grootegleuk Mines offset areas. The farm Vooruit is also part of the Manketti Lodge area. Are you aware of any communities/organisations/community groups etc which operate within the application area that should be informed? Please provide details and if

Response

The questionniare was noted and recorded.

# Comments and Responses 1590 Thungela Lephalale CBM EIA

## Ms Filomaine Swanepoel

possible contact details? No. Are you aware of any tribal authorities, indigenous peoples, or ethnic and culturally distinct groups that may be affected by the aforementioned project? Please provide details and possible contact details? No. Are you aware of any other stakeholders who need to be notified/engaged? Please provide detail and possible contact details? Exxaro Coal (Pty) Ltd - \*\*\*\* are the Environmental Specialists for the mine and Siviwe Kabena the Head of Ferroland \*\*\* Please can you provide us with a high-level description of the aspects of the environment upon which the project may directly or indirectly be impacted? (including uses such as fishing, shipping, mining; topographical features; Infrastructure; sensitive flora/fauna) Sensitive flora and fauna as well as sensitive seasonal pan areas and the non-perineal drainage areas to the sandloop spruit tributary of the Mokolo river. Are you aware of any other activities (current or proposed) within, or adjacent to the application area that may be relevant to the proposed project? (this may include, but not limited to, pending, accepted or granted mining permits, prospecting rights, mining rights, and renewable energy projects) No. Are you aware of any cultural or heritage resources (including intangible resources) within the application area and surrounds? Please provide detail? Manketti Trees community on Eendrachtspan Please describe any bio-physical and/or socio-economic impacts that you believe should be considered during the study? Impacts on the surface water drainage and seasonal wetlands in this area. Hydrogeological impact from the Coal Bed Methane abstraction. Do you have any other specific concerns, comments or objections to the proposed project? If so, could you please provide us with information? Same as above.

## Koketso Phiri

Date 2026/04/16 Method Email

### Comment

Good Day I hope this email finds you well. Please register our company in your I&AP database for the above reference. Our Detail: NGIYAKUZWELA TRADING AND PROJECTS (PTY) LTD. \*\*\* Reason: We have a Mining Right with the DMPR in the said Production Right Application area. Regard,

### Response

Good day Koketso, Thank you for your email. Please note that you have been added onto our database as an I&AP, you will receive all proposed project related information going forward. For anything further, please do not hesitate to contact us.

## Hlatsila Nku

Date 2026/03/21 Method Email

### Comment

Dear Sir/Madam, I trust you are well. I would like to formally register as an Interested & Affected Party (I&AP) for the proposed Gas/Methane (CBM) Project in the Lephalale

### Response

Good day Hlatsila, Thank you for your email, your reasons for registration have been noted. Please note that you have been added onto our database and an I&AP, you will receive all project



# Comments and Responses 1590 Thungela Lephallale CBM EIA

Hlatsila Nku

(Waterberg) area. related communication going forward. For any comments and/or queries, please do not hesitate to contact us.

Mr A Martens

Date 2024/01/12 Method Questionnaire

Comment	Response
Are you directly impacted by the project? Live on property and benefit directly from its income generated by property Are you a user of the application area or directly adjacent areas? If so, please describe your use of the application area. Yes adjacent to project and benefit from income generated from property Are you aware of any communities/organisations/community groups etc which operate within the application area that should be informed? Please provide details and if possible contact details? None Are you aware of any tribal authorities, indigenous peoples, or ethnic and culturally distinct groups that may be affected by the aforementioned project? Please provide details and possible contact details? None Are you aware of any other stakeholders who need to be notified/engaged? Please provide detail and possible contact details? Already notified Please can you provide us with a high-level description of the aspects of the environment upon which the project may directly or indirectly be impacted? (including uses such as fishing, shipping, mining; topographical features; Infrastructure; sensitive flora/fauna) Property is directly located adjacent to project and feel that it will impact the game and the flora/fauna on property Are you aware of any other activities (current or proposed) within, or adjacent to the application area that may be relevant to the proposed project? None Are you aware of any cultural of heritage resources (including intangible resources) within the application area and surrounds? Please provide detail? None Please describe any bio-physical and/or socio-economic impacts that you believe should be considered during the study? Groundwater impact and game activities of property adjacent to project. Unwanted entry and or access control to property adjacent to project.	Confirmation of receipt sent to I&AP and comments recorded in report. See full questionnaire attached in Correspondence Document.

Mr Clive Perkins

Date 2023/11/08 Method Telephone

Comment	Response
I&AP called to request registration and information on affected properties	I&AP was provided information via Whatsapp as requested telephonically. See below comment

Date 2023/11/08 Method WhatsApp

Comment	Response
---------	----------

## Comments and Responses 1590 Thungela Lephallale CBM EIA

### Mr Clive Perkins

Farm Cambridge Lq 12 and Lq 7and Dedam Lq8 ! Can I have the names of farms in the green area pls

Phase 1 and 2 (the green area) will affect the following properties: Withoutpan 404, Paddakraal 405, Ganzepan 446, Vooruit 449, Schrikvoorby 445, Gelykbult 450, Welgevonden 444, Eendragtpan 451, Grootpan 452, Elandsvley 453, Nooitgedacht 403, Bulkliip 701.

Date 2026/03/20 Method Email

#### Comment

Good Day My name is Clive Perkins of Farms Cambridge LQ 7 both and 12 and De dam 08 ! I would like to know everything that goes on as I am an affected person ! Regards Clive Perkins

#### Response

Good day Clive, Thank you for your email. Please note that you have been added onto our database as an I&AP. You will receive all project related information going forward. For any further comments and/or queries, please do not hesitate to contact us. Kind regards, EIMS Public Participation Team

### Joey

Date 2026/04/24 Method Email

#### Comment

Dear Lucien Thank you for the information below. Where will the approved extraction points for the CBM be situated on each of these farms and the area size occupied by these extraction points? Kindly provide coordinates. Please confirm whether there will be any linear gas transportation pipe across these farms and where that will be situated on each farm. Also, is any surface mining for coal going to be done on these farms, and which farms will be affected? Will it be open pit or underground mining? Thank you,

#### Response

Dear Joey, Thank you for reaching out. As requested, the farms which will be affected by the Thungela Coal Bed Methane project as per the EA application include: • Withoutpan 404 • Paddakraal 405 • Ganzepan 446 • Vooruit 449 • Schrikvoorby 445 (Remaining Extent) • Schrikvoorby 445 (Portion 1) • Gelykebult 450 • Welgevonden 444 • Eendragtpan 451 • Grootpan 452 • Elandsvley 453 • Nooitgedacht 403 • Bulkliip 701 (Remaining Extent) • Bulkliip 701 (Portion 1) • Leeuwfontein 400 • Oliphantspad 255 • Klimopfontein 223 (Remaining Extent) • Kurzabonakop 399 • Kerryfontein 402 • Waterval 169 (Remaining Extent) I have also attached locality maps indicating the extent of the EA application area. Should you need anything further, please do let me know.

Date 2026/04/29 Method Email

#### Comment

Good evening Lucien Thank you for this information. We look forward to receiving the scoping report or to have access to it. Best regards Joey

#### Response

Dear Joey, I hope you are well. I can confirm that this project does not involve any surface mining. In terms of information relating to the wellfield and other infrastructure, this will be available in the upcoming Scoping Report which will be made available to the public for review and comment. We will include your details in our I&AP database of this project so that you are notified of the availability of the Scoping Report which will include the finer details of the project. I hope you have a good weekend further, and do send any further comment and correspondence to our dedicated email inbox for this project, lcbm@eims.co.za.

# Comments and Responses 1590 Thungela Lephalale CBM EIA

Mr Willem van Rooyen

Date 2023/11/10 Method Email

Comment

Can i please have more detailed info on location (farm names) of the project from thungela at lepalalle area.

Response

Your e-mail below refers. Affected farms are all included in the green area on the map. These include: Withoutpan 404, Paddakraal 405, Ganzepan 446, Vooruit 449, Schrikvoorby 445, Gelykbult 450, Welgevonden 444, Eendragtpan 451, Grootpan 452, Elandsvley 453, Nooitgedacht 403, Bulklip 701.

Yegeshni Moodley

Date 2023/11/03 Method Email

Comment

Please register my details as an IAP.

Response

Thank you for your e-mail. We can confirm that your details have been included in our I&AP database.