

www.umzimvubu.org



SLR CONSULTING

ATTENTION: Stella Moeketse and Matthew Hemming

P.O. Box 1596

Cramerview

2060

5 October 2015

RE: Rhino Oil & Gas application (PASA 295ER) for prospecting in the Matatiele area

Dear Stella and Matthew

We write in response to the BID received on 16/09/2015, via email from a colleague, regarding the Rhino Oil & Gas application (PASA 295ER) for prospecting in the Matatiele area.

We represent an alliance (the Umzimvubu Catchment Partnership Programme / UCPP) of over 34 local organisations in the Umzimvubu catchment, mostly located in the Matatiele area downstream within the Umzimvubu catchment, all of whom have subscribed to a common vision of restoration of the catchment to secure strategic water resources and ecological services, for the benefit of the more than 1 million people dependent upon such resources in the wider catchment.

We hereby register the Umzimvubu Partnership as an IAP, on behalf of its membership, as agreed at our quarterly partners' meeting held on 23rd September. The registration form is attached as per the BID. We operate as the voluntary secretariat and can circulate information regarding the consultation process to our membership. More information on the UCPP can be found on www.umzimvubu.org

Our contact details are as follows:

Mr Sinegugu Zukulu (chairperson: szukulu@conservation.org) 072 428 5109 and

Mrs Nicky McLeod (secretariat: nicky@enviros.co.za) 082 782 6067

P.O. Box 14 / 110 Main Street, Matatiele, 4730

Please find attached a factsheet on the partnership and the area, along with the MoU signed by the members in March 2013, as well as a map of a proposed stewardship plan which has been adopted by the Matatiele Council towards restoration of the ecological services in the upper catchment.

We have grave concerns regarding the incompatibility of gas exploration techniques and groundwater contamination and security. **The use of water for fracturing is NOT compatible with the supply of sufficient**

potable water for the residents of the area, who already face water supply shortages, especially during winter.

We represent a variety of groups and local citizens which are active and resident in the Matatiele area: we drink the water daily, we paddle the rivers in summer, we derive a living off sustainably farming the landscape, and we value the clean watershed and rural landscape which supports several tourism activities employing hundreds of local people.

In summary our concerns an interested and affected party, include:

Health: human and ecological

Use of volatile organics compounds in diesel (trucks and generators) and and unknown chemical cocktails used in fracking fluids, to up efficiency of drilling process, e.g benzene. These are known carcinogens and endocrine disruptors, exposure to which can lead to reproductive health risks including still births and infertility. Matatiele's primary economic activity (communal and commercial) is cattle farming for beef and dairy. Can we take this risk?

Social stress and disruption: outsiders working, accommodation price hikes, trucks and earth tremors in local vicinity of wells.

Water and ecosystem functions

Huge water use (over 20 million litres per well, apparently?) in a water-stressed landscape, which is a source of water for drinking, irrigation and recreation for over 1 million downstream users. Mess up the factory, what happens down the line?

Waste water treatment, release and leakages are a huge concern.

Water: potential contamination of surface and groundwater through aquifers and water leakages. District as WSA is providing groundwater to thousands of people in Matatiele and Maluti areas, mostly dependant upon boreholes for supply.

Local agricultural productivity and opportunities: farming not fracking will benefit many more people

Loss of productive land and opportunities: access roads, drilling sites, contamination. Matatiele has a high agricultural quotient

Loss of herd productivity (see health concerns above)

Restoration of catchment functions to benefit all users and sustain long term, growth of beef industry on meat natural concept to eventually benefit over 8000 rural households.

How many households will prospecting and fracking support, really, and for how long, in comparison with diverse farming practices off a healthy landscape?

Climate change impacts

Methane leaks: dozens of times more potent as a greenhouse gas than carbon dioxide.

QUESTIONS:

How many jobs will be created during prospecting and if approved, during drilling and extraction? REALLY?
Specialised skill requirements vs local unskilled labour?

How much water will be used for prospective core drilling, as well as well development and fracking if prospecting is successful, and where will this water be sourced from?

What chemicals are to be used in the process to augment underground fracturing?

Where will product be sold? Who will actually benefit from any product development? South Africa is not geared to operate vehicles on methane in the near future.

SUGGESTIONS:

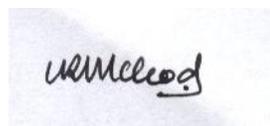
- Precautionary approach to hydraulic fracturing using alternative methods and fluids, moratorium until we know exactly what the long term costs are (residents / land users and downstream water users) for the short term gain of a few (Rhino Oil & Gas)
- This activity could constitute an infringement of environmental rights of citizens, through an injustice to benefit a foreign-owned company profit (Rhino Oil & Gas). This could result in a class action by the people of Matatiele who stand to gain very little, and lose very much.
- We request applicant and EAP to prove beyond reasonable doubt that hydraulic fracturing / fracking will not result in any of the above concerns as articulated.

We strongly question the justice of why an outside company should derive short term economic gains at the expense of potential long term losses for the residents of the catchment.

FARMING, NOT FRACKING, will benefit more people for a longer term in this rural landscape which provides the water for more than a million downstream users.

We trust that our collective concerns will be duly considered during your scoping process, and look forward to your response and to the details of any public participation opportunities.

yours faithfully



Sinegugu Zukulu
Chairperson

and

Nicky McLeod
secretary

On behalf of Umzimvubu Partnership members, as per proceedings and resolution of meeting on 23/09/2015