

The Regional Manager
Department of Minerals and Energy
Private Bag X9
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South Africa

29 May 2010

Dear Sir / Madam

RE: Environmental Management Plan: Riviera Tungsten project, Reference: WC30/5/1/1/2/434PR A/2010/03/26/001

On April 23, 2010, I was registered with Withers Environmental Consultants (WEC) as an Interested and Affected Party (IAP) with regard to an application by Bongani Minerals (the Applicant) to procure prospecting rights for the Riviera Tungsten Project in the Piketberg magisterial district. During this weekend I have reviewed the documents pertaining to the Environmental Management Plan available at the download section of the WEC website, and am below raising a number of relevant concerns

1. Draft or incomplete EMP documentation

The currently available Environmental Management Plan (EMP):

- is in draft format
- refers to supporting documentary appendices that themselves contain preliminary findings pertaining to environmental factors to be considered during prospecting
- contains incomplete assessments of local water availability and consumption during drilling activities
- omits to consider a number of potential environmental impacts
- fails to provide a clear layout of a typical drillsite
- outlines inadequate and misleading financial provision for environmental impact ameliorization that is directly related to the proposed drilling activities
- makes no provision for loss-of-use compensation to landowners
- does not contemplate potential damage claims that may result from prospecting activities

It is the duty of the applicant to make available a complete and finalized version of the EMP such that informed and constructive comment can be made by IAPs. In what follows below I outline a few (of several) examples demonstrating that the EMP is materially incomplete.

2. Drill site layout, remediation and water resource management

The Prospecting Right Application (PRA) outlines that core and reverse-circulation drilling to depths of 150 or 200 meters constitutes the most invasive portion of the Prospecting Work Program (PWP), and that drill site layout and drilling itself would cause the most direct and obvious environmental impact. Given the PWP contemplates 160 such drill sites, it is expected that engineering drawings of the footprint of a typical drill site is given in the PWP and the EMP. Such drawings should contain

- the size, number and typical lay-out of pits (or sumps) required to manage fresh water, drilling fluids, waste water and settling of fines

- location and intended use of 4 x 5,000 liter plastic reservoirs
- location and dimensions of containment berms to prevent uncontrolled effluent escape from pits during high rainfall events
- sites where diesel fuel or lubricants could be spilled (notwithstanding the proactive measures declared in the EMP in this regard)
- the full extent over which local vegetation or agriculture would be impacted around a drill site, inclusive of pipe or drilling steel lay-down areas, size and location of all structures and provision for access roads and vehicle turning circles. The text suggests an area of 60 m² is adequate, though it remains to be demonstrated that a working drill rig with 2 x 6.3 m² pits, 4 x 5,000 liter reservoirs, all ancillary equipment, support vehicles and requisite vehicle spoor would actually fit inside such a footprint.

Photographs of drill sites before use, during use and after remediation by the Applicant or their proposed drilling contractors (at previous drill sites) must be readily available and would be an obvious and valuable addition to the EMP and PRA. That photos or engineering drawings are not provided indicates either a lack of familiarity with drilling by the Applicant, or a blatant disregard on their part to transparently illustrate their claimed competence at managing environmental issues at drill sites.

The current EMP indicates that each drill site will contain two plastic-lined sumps, each 2.5 x 2.5 m wide and 1.7 m deep, plus 4 x 5,000 liter plastic reservoirs. Given each sump would hold 10,625 liters (by calculation), the total water storage capacity at each drill site would add up to 41,250 liters. This is clearly inadequate to hold the 70,000 liters of water that the EMP states (on page 24) would be required for initial filling. The Applicant is apparently not concerned by their lack of accounting for 30,000 liters of water at each drill site. One is left wondering whether this disregard of water resources is indicative of the Applicants' general treatment of other matters of environmental concern ?

3. Rehabilitation cost and the DMR's exposure

Under section C.7 of the EMP (page 34), the DMR is advised that their exposure to total rehabilitation costs for all operational damage would amount to approximately R80,000. Inspection of the supporting calculations given in Appendix B of the EMP shows that expenditure of R76,000 is envisaged to rehabilitate two pits and an assumed 1 km x 3 m of roadway and drilling/logistics area. This rehabilitation cost estimate then logically relates to a single drill site.

Must IAP's then assume that the Applicant intends to rehabilitate only 1 of the 160 drill sites proposed in the PRA ? Who is going to clean up the remaining 159 drill sites ?

Why does the Applicant not realise (or know) that the cost to remediate 160 drill sites will run into R8 million or more ? Their own per-site cost estimate suggests an amount of R12.2 million would be required (160 sites x R76,000 = R12.2 million).

Must the DMR then also assume that a simple accounting error was made that has the effect of not alerting the DMR of its' exposure to R12.2 million in potential rehabilitation costs ?

4. Conclusion and Remedy

As an IAP, I find it disconcerting that the Applicant sees fit to lodge an application to prospect that is in draft format, clearly incomplete and fails to demonstrate their knowledge of, and competence in, managing ordinary environmental impacts associated with drill sites.

It is additionally disturbing that the Applicant is unable to recognize that an amount of R80,000 cannot be remotely adequate to cover all the remediation obligations of 160 drill sites, and that the Applicant apparently has no means (nor the apparent inclination) to audit or benchmark cost estimates for drilling programmes.

This IAP contends that the Applicant has failed to transparently demonstrate technical and financial competence with respect to environmental management of prospecting programmes. This EMP and related PRA should be rejected.

Respectfully submitted

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