



REPUBLIC OF NAMIBIA

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MINISTRY OF AGRICULTURE, WATER AND LAND REFORM

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Department of Water Affairs  
Private Bag 13193  
WINDHOEK  
Namibia

The Senior Administrator  
Mr Aldo Hengari  
Headspring Investments (Pty) Ltd  
P O Box 318  
WINDHOEK

Dear Sir

**NON-COMPLIANCE WITH PERMIT CONDITIONS: PERMIT NO. 11561 ISSUED FOR THE DRILLING OF NINETEEN BOREHOLES FOR EXPLORATION PURPOSES AND PERMIT NO. 11562 ISSUED FOR THE DRILLING OF EIGHTEEN BOREHOLES FOR HYDRO-GEOLOGICAL PURPOSES.**

1. Permits 11561 and 11562 were issued to Headspring Investments (Pty) Ltd on 30 March 2021, exploration and hydro-geological purposes, respectively.
2. The Ministry of Agriculture, Water and Land Reform carried out a site visit on October 2021 and is extremely concerned about Headspring Investments (Pty) Ltd's non-compliance with permit conditions 8 and 9 of Permit No. 11561, and 9 and 10 of Permit No. 11562 among others.
3. Specifically, the following gross violations were observed:

3.1 The boreholes to be drilled for hydro-geological study purposes have actually been drilled in a specific pattern mimicking that of an in-situe leaching technique proposed in a Background Information Document prepared by the Consultant hired to carry out the EIA process for that.

3.2 The exploration boreholes are **not being drilled** as per the permit conditions, where drilling activities require that the Kalahari aquifer be cased off and grouted before drilling into the Auob aquifer.

3.3 Some of the exploration boreholes are left open for long periods of time, allowing the mixing to last even longer, forming pathways for the contaminants to enter the subsurface and unsealed boreholes are potential lock falls for livestock or wildlife.

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3.4 For the hydro-geological study boreholes, a plain steel casing is installed to the depth of 60m, way above the Rietmond Layer (blue shale). The Kalahari aquifer was struck below the 70m in almost all the boreholes, while the Auob aquifer below 100m. The cementing is done only later after PVC casing installation and gravel packing.

4. Additionally,

4.1 You have not made the permit conditions available to the drilling contractors, hence the driller, almost if not all of whom were drilling in the area for the first time, and not registered with this Ministry, were not aware of the special drilling specifications for the Stampriet Artesian aquifer system.

4.2 At least 70 more boreholes have been drilled for exploration purposes without a valid permit.

4.3 At least 7 more boreholes have been drilled for hydro-geological study purposes without a valid permit.

5. Based on the above gross violations and non-compliance of permit major conditions Permit No. 11561 and Permit No. 11562 is hereby withdrawn as per condition number, 5(a) and 6(a) respectively, with immediate effect and no further drilling is permitted.

6. You are requested to submit all information as per permit conditions 8.8 for Permit No. 11561 and 9.11 for Permit No. 1156. You are advised to consult Mr. B Swartz (Tel. 061-2087089) of the Geohydrology Division in the Directorate of Water Resources Management in this Ministry for further information.

7. Immediately return Permit No. 11561 and Permit No. 11562 dated 18 March 2021 back to this Ministry for cancellation.

  
Percy W. Misika  
**EXECUTIVE DIRECTOR**

REPUBLIC OF NAMIBIA MINISTRY OF AGRICULTURE, WATER AND LAND REFORM
09 NOV 2021
Private Bag 13104, Windhoek Directorate of Water Resource Management