



The Perenco Group has taken note of the report published by the Environmental Investigation Agency US ("**EIA**") on 22 May 2025 (the "**Report**").

Contrary to what the Report claims, EIA did not offer the Perenco Group an "opportunity to respond to the findings of its investigation" before publication. EIA merely sent the group a list of 35 biased and prejudice questions, 48 hours before the scheduled date of publication of the Report. It is therefore patently disingenuous for EIA to assert in the Report that Perenco's counsel "did not identify any specific findings that were either incorrect or biased." For the sake of transparency, EIA's letter of 12 May 2025 and the response from Perenco's counsel on 14 May 2025 are appended (Appendices 1 & 2).

The desire to smear the Perenco Group and do it harm, and a complete disregard for the facts of the matter, is evident upon reading EIA's letter of 12 May 2025. It is plainly apparent on (almost) every page of the Report. This statement will therefore not respond point-by-point to the collection of approximations, errors and falsehoods that characterize the Report. For example, it simply makes no sense to suggest that "the company systematically misdeclared its production in DRC by at least 5 kbopd", when there is only one local export terminal and each barrel exported is taxed under the supervision of the relevant Congolese authorities. This is only one example.

That said, the group cannot remain silent in the face of the revolting manipulation of the accident that occurred on the Becuna platform operated by Perenco Oil & Gas Gabon ("**POGG**") on 20 March 2024 (the "**Accident**"). Six people have lost their lives, yet over the eleven or more pages focused on the Accident, misinformation and slander achieve new heights. This statement and the corrections below are not intended to be exhaustive – and no doubt this will be used as a pretext for yet more misinformation and slander – but simply to re-establish some accessible truths. These should enable a reasonably attentive reader to consider the Report for what it is: a propaganda tool with no ambition to tell the truth.

Generally speaking, any fact or allegation in the Report that is not explicitly confirmed in this press release is denied.

1. The Report repeatedly states that the Accident was the result of safety failures caused by a desire to "maintain production [from the well] at all costs".

This statement alone shows that the so-called EIA "investigation" is not credible: the well in question (Simba 3) had been shut down since 27 February 2024, in other words for over three weeks, when the Accident took place. Moreover, a "workover operation" necessarily means the relevant well was in shutdown.

2. According to the Report, the intervention on the well was carried out by a "P-115 team [which] was smaller, less well-equipped and less experienced", because "the P-225 team" had allegedly refused to continue the workover operation due to "multiple safety concerns about the company's preparations" for the operation, including "two oil surges" on 6 and 7 March 2024.

These statements are nonsense. Out of either ignorance and/or a deliberate intent to harm, EIA confuses "team" and "unit". Teams are made up of individuals; units are a set of equipment. A unit does not refuse to work, and one unit has no more experience than another. P115 and P225 refer to POGG *units*, not teams.

Moreover, "workovers" are maintenance operations on wells already in production. They are standard operations in the oil industry. Perenco subsidiaries collectively have carried out more

than 7,500 workovers over the last 10 years. POGG specifically has carried out more than 1,500 such operations over the same period.

At the time of the Accident, POGG had four offshore workover units, including the P115 and P225. Before the Accident, the Simba 3 well had already undergone four workover operations. These had not set off any particular safety alert. The workover operations were performed using different units: P115, P225 and LSU.

Unit P115 replaced unit P225 for the workover operation in progress at the time of the Accident because of hydraulic malfunctions observed on unit P225 during preparatory tests conducted several days before the Accident. The P115 unit ultimately used had already been used for a previous workover operation on the same well.

Typically, a workover operation requires two teams, one during the day, the other at night. The day team mobilized was the scheduled team (the change of unit is irrelevant); it did not replace another team that refused to intervene for safety reasons. The team was experienced; some members had already worked on the well and were therefore familiar with it.

To POGG's knowledge, there was no "oil surge" on 6 and 7 March 2024, contrary to what is asserted in the Report. According to information collected after the Accident, only a low-intensity fluid surge was observed at the exit of the tubing on 8 March 2024. The team responded immediately by securing the well before pumping it again to check it. Once this procedure had been implemented, the team was able to resume operations. It was later considered that the surge was the result of a "U-tube" effect between the annular space and the tubing and not an influx, and so did not require any specific additional measures. As a "U-tube" effect is a minor event, it was not recorded.

3. On multiple occasions, the Report states that employees involved in operations were "pressured" to "prioritize production at all costs", to the detriment of safety concerns.

Personal safety is a core concern of POGG and more generally of all the group's subsidiaries.

We therefore strongly reject the allegations – which have not been proved – that "pressure" was exerted on employees. In particular, POGG employees and all service providers involved in its operations are trained and made aware of the "Stop Work Authority" principle, according to which any person, no matter what their rank, who believes they are in an actual or potentially dangerous situation has the right and the duty to interrupt any operation in progress. A sheet reminding people of the importance of "Stop Work Authority" is displayed on all workover units (this was true for unit P115 at the time of the Accident). Awareness campaigns are also conducted regularly. No staff has ever been sanctioned for having used the Stop Work Authority.

4. According to the Report, "crucial safety equipment that could have prevented the explosion was missing from the oil platform" or was "non-functional."

Like the confusion between team and unit discussed above, these allegations illustrate the serious flaws in EIA's so-called "investigation."

Generally speaking, the Becuna platform is equipped with the necessary safety equipment. The hazard study established for the Tchatamba site (to which the Becuna platform is attached) was approved by the Gabonese authorities. We strongly reject allegations about the supposedly dilapidated facilities of the Becuna platform.

Furthermore:

- Blow out preventer (BOP): the P115 unit did have a BOP. The BOP on the P115 unit was identical to that of the originally mobilized P225 unit. The BOP on Unit P115 was successfully tested on the well on 9 March 2024. After the Accident, rescue teams dispatched to the Becuna platform activated the BOP to close the annular space of the well. The BOP functioned normally without showing any signs of malfunctioning.

- Safety valve: there was indeed a safety valve. Employees who were involved in the workover operation were able to set it up on a regular basis whenever necessary (for example during breaks). At the time of the Accident, the workover crew members were in the process of setting it up.
- Winch: Unit P115 was indeed equipped with an operational winch.

**5. The Report repeatedly states that "the conditions for a fire triangle were met".**

Aside from its multiple references to the "conditions for a fire triangle", and contrary to what it claims, the Report does not examine the cause of the ignition that caused the Accident.

Following the Accident, POGG commissioned an independent expert, a specialist in preventing and controlling fire risk, to identify the ignition source or sources. The expert went to the Becuna platform to make observations on site.

The expert's conclusions are clear: after analysis of all the equipment on the platform (including the power pack mentioned in the Report), only one was identified with "extremely high" probability as the cause of the fire. It is a lighting equipment sold as "Ex" equipment – i.e. equipment with explosion protection – suitable for areas where dangerous quantities and concentrations of flammable gases or vapours may occur. However, in contrast with the characteristics emphasised by its manufacturer, the lighting equipment was affected by several instances of non-apparent non-compliance. The fire on the platform, and therefore the Accident, would never have occurred if the lighting equipment had actually included the "Ex" protections put forward by its manufacturer.

After the independent expert provided his report, POGG (i) removed all of that manufacturer's lighting equipment from all of its operational sites, (ii) forwarded the report to the Gabonese authorities, and (iii) filed a criminal complaint.

**6. The Report claims that "stopping the power pack would have averted the accident entirely".**

The statement is obviously inaccurate. No one has ever claimed that the ignition was caused by the power pack. The power pack was several metres away from the ignition point and no trace of power pack deformation was noted after the Accident. It can therefore be ruled out as the ignition source.

It has, however, been established that the ignition point was on the work floor, due to a lighting equipment that did not have the characteristics claimed by its manufacturer.

**7. The Report claims that the workover operation during which the Accident occurred was entirely supervised by the group's French subsidiary, which decided to continue the operation despite the alleged existence of "several warning signs".**

These statements are plainly inaccurate. The role in the Accident that EIA attributes to the group's French subsidiary is based on nothing whatsoever.

As stated above, there were no particular alerts in the days leading up to the Accident.

In concrete terms, the French subsidiary provides services to other subsidiaries in various fields. It is not in charge of workover operations conducted by operational subsidiaries.

**8. On several occasions, the Report accuses the group of having tried to obstruct the investigation carried out by Gabonese authorities to determine the cause of the Accident. The Report refers in particular to (i) the concealing of evidence, (ii) pressure supposedly exerted on witnesses, and (iii) a bribe of CFA 40 million allegedly paid to Prosecutor Mvou Loubamono.**

We strongly dispute these serious, obviously unproven allegations.

From the moment the Accident occurred, POGG has fully cooperated with the Gabonese authorities to shed light on the circumstances of the Accident. At no point in time did POGG attempt to obstruct the Gabonese authorities' investigation process in any way. No bribe was paid to Prosecutor Mvou Loubamono.

Contrary to the allegations in the Report, as soon as the Accident occurred, POGG mobilized significant resources, in a way that was completely transparent to Gabonese authorities, with a constant concern with cooperating in order to shed light on the circumstances of the Accident. POGG's findings have been forwarded to the authorities.

9. The Report states that the families of those who unfortunately died in the Accident were not compensated, with the exception of Mr. Gares' relatives who allegedly received USD 10 million in exchange for signing a confidentiality agreement.

This accusation is yet another illustration of the poor information on which the Report is based and EIA's distorted use of the term "investigation".

After the Accident, the Gabonese government set up an "Interministerial Commission on the Accident on the Becuna Platform" by Order No. 0434/PM of 22 May 2024. The Report appears to ignore this public information. The Commission, which was placed under the authority of the Prime Minister of the Transition, supervised the process of compensating families, including the determining of compensation procedures and other support. To date, with the exception of one representative of a single family who refused the compensation offered, all the victims' families have entered into settlement agreements under the auspices of the Commission, thereby allowing 22 people to receive compensation.

As regards the family of Mr Gares, the Report's information is false in every respect.



May 12, 2025

Armel Simondin, Chief Executive Officer, Perenco Group

Eric Iwochewitsch, Chairman and Chief Executive Officer, Perenco SA

**Subject: Request for Response Regarding Environmental Investigation Agency (EIA US)'s Research**

Dear Mr Simondin and Mr Iwochewitsch,

I am writing to inform you that the Environmental Investigation Agency (EIA US), based in Washington, DC, has completed an investigation into Perenco Group's operations. We would like to offer you the opportunity to respond to the following inquiries before the issuance of our report.

We would appreciate your responses to these questions related to the investigation:

1. Is it true that the explosion that occurred on the Becuna platform off the shore of Gabon in March 2024 occurred during a workover operation?
2. Did workers involved in the March, 2024 workover operation on the Becuna platform, or its preparation, raise concerns regarding the risks associated with the preparation and the operation itself? In the affirmative, have these concerns been raised to management based in Gabon, France, and/or the United Kingdom (UK) at any point?
3. Did oil surges occur during the preparation of a workover operation on the Becuna platform between March 6 and 8, 2024?
4. Were these oil surges documented in the daily report prepared by the company man? If not, did any manager within Perenco Group management based in Gabon, France and/or the UK ask the company man to exclude the mention of these surges from the daily report?
5. Did any member of management located in Perenco Group's London and Paris offices intervene at any point to ensure the continuation of the workover operation taking place on the Becuna platform after surges occurred from March 6-8?
6. Did Perenco Group management replace the P-225 workover unit with the P-115 workover unit to execute the workover operation on Simba III in March, 2024? If so, was this personnel decision made after members of P-225 raised concerns about the safety of the workover operation?
7. Has Perenco Group dismissed or relocated workers or contractors who previously raised safety concerns regarding operations on the Becuna platform?
8. Is it true that the shear rams on the blowout preventer used on the Simba III well on the Becuna platform were not operational prior to the blowout on March 20, 2024 that preceded the explosion that led to the deaths of six workers?
9. Was Perenco Group management aware of allegations that the Becuna platform was hazardously dilapidated prior to the March, 2024 explosion, including the absence or failure of key equipment such as the shear rams?

10. Did Perenco France management instruct either the P-115 or P-225 workover unit to proceed with the workover operation after workers or contractors executing the workover raised safety concerns?
11. Did Perenco France management instruct Perenco Oil & Gas Gabon management based in Port-Gentil to proceed with the workover operation despite safety concerns raised by on-site workers?
12. Is it true that more than 90% of personnel working in drilling, workover, and operations on Perenco Group sites in Gabon are provided by personnel and logistics subcontractors, and that these workers are generally on renewable contracts of less than one year in duration?
13. Has Perenco Group management, directly or indirectly, taken measures to prevent independent experts from accessing the Becuna platform for an investigation immediately after the March 2024 explosion?
14. Did the Perenco Oil & Gas Gabon crisis response cell, or any other personnel working for or contracted by Perenco Group, dispose of human remains on the Becuna platform after the accident of March 20, 2024 and before the arrival of governmental authorities and/or investigators at the platform?
15. Is it true that, at the time of the incident, there was not, and that there currently is not, a fire safety system on the Becuna platform?
16. Is Perenco Group aware of allegations that workers are discouraged from reporting safety violations due to fear of contract termination or non-renewal? Has the company taken steps to address this?
17. Did Perenco Group representatives, including senior executives, attempt to influence or limit the scope of any investigation conducted or commissioned by the government of Gabon into the Becuna platform fire?
18. Has Perenco Group been involved in any discussions with Gabonese authorities regarding the results of the investigation commissioned by the government of Gabon into the Becuna platform fire?
19. Can Perenco Group address allegations that a bribe of 40 million Central African CFA (approximately \$65,000 USD) was paid to senior prosecutor Edith Christiane Mvou Loubamono to take over the investigation into the disaster, release detained employees, and cover up the Becuna incident?
20. Did any executive or representative of Perenco Group from the company's France or UK office visit any hospitalized survivor of the explosion and instruct them on what they should or should not say to investigators?
21. Do Perenco Group's Paris and London offices exercise control over the strategic planning of the group's operative subsidiaries?
22. Do Perenco Group's Paris and London offices have final authority over work plans and budgets for the group's operative subsidiaries?
23. Is it correct that Perenco Group's management decisions regarding workovers, drilling, human resources, and Quality, Health, Safety, and Environment (QHSE) are primarily made by personnel in the group's Paris office?
24. Is it correct that Perenco Group requires the group's subsidiaries to maintain a positive cash flow on a monthly basis?
25. Are financial planning decisions for the group managed by the group's London office?
26. Has Perenco Group failed at any point to report environmental incidents, including oil spills and gas leaks, to relevant regulatory and/or governmental authorities in Gabon, the Democratic Republic of Congo, Trinidad and Tobago, and other countries where it operates?

27. Is it correct that Perenco Group management in Paris and London has real-time information and direct control over decisions regarding well production, and that shutting down wells requires authorization from senior executives?
28. Given that there are several registered Perenco Group holding companies in the Bahamas, can you respond to the claims that these entities serve as shell companies for tax and financial secrecy purposes?
29. Does Perenco Group maintain that its production in the Democratic Republic of the Congo has not exceeded 20 kbopd for all assets in the country?
30. In light of the ongoing audit commissioned by the DRC's Ministry of Hydrocarbons, can Perenco Group confirm whether it will fully cooperate with this investigation, and will it publicly disclose the audit findings to ensure transparency and accountability regarding its royalty payments to the DRC government?
31. Has Perenco Group received approximately US \$77 million from the government of Guatemala since the beginning of operations in recouped operating costs?
32. Did a fire occur on the Teak Alpha offshore platform in Trinidad and Tobago in January, 2020? Were three workers injured as a result of this fire?
33. Have Perenco Group offshore installations in Trinidad and Tobago caused spills that have resulted in oil slicks?
34. Are Perenco Group's revenues or profits routed through tax havens such as Luxembourg, Guernsey, and the Bahamas? Are revenues or profits also routed into real estate and other holdings across Europe?
35. Is it correct that the Perenco Group paid approximately \$10 million to the family of the company man who died in the Becuna accident, and had them sign a non disclosure agreement?

We welcome your response in writing to the above queries by May 14, 3:00 PM GMT+2.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alexander von Bismarck', with a stylized, cursive script.

Alexander von Bismarck  
Executive Director  
Environmental Investigation Agency US

Environmental Investigation Agency US

For the attention of Alexander von Bismarck

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Date  
14 May 2025

Dear Mr. von Bismarck,

I am writing as counsel for Perenco following your letter dated 12 May 2025 attaching a list of 35 questions and requesting answers to the same within 2 days, i.e. by 14 May, 15h00 GMT+2.

My client understands that eia claims that it "has [already] completed an investigation into Perenco Group's operations," of which my client was unaware until your letter. In light of the timing, the biased and prejudice nature of your questions as well as certain express or implicit underlying assumptions to the same, my client will not comment.

That being said, my client requests that you mention the content of this letter, should you decide to make public any form of report in relation to the subjects linked to the aforementioned questions.

Finally, please note that my client reserves all its rights in relation to this matter and, in compliance with the rules of the Paris Bar, I have to inform you that you may provide this letter to your counsel who, if they believe it appropriate, may liaise with me.

Sincerely yours,



**Clément Dupoirier**

Avocat au Barreau de Paris

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