



26th January 2024

TL2024/0126/1A

Directorate General Petroleum Concessions,
Ministry of Energy (Petroleum Division),
Islamabad.

Sub: Complaint on the Violation of Pakistan Petroleum (E&P) Rules 2001 and Natural Gas Regulatory (Licensing) Rules 2002 due to Unauthorized Third-Party Gas Sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation.

Dear Sir,

Transparency International Pakistan refers to its previous letters TL2023/1002/1A, dated 02 October 2023, and TL2023/1102/1A dated 02 November 2023 on complaint on the violation of Pakistan Petroleum (E&P) Rules 2001 and Natural Gas Regulatory (Licensing) Rules 2002 due to unauthorized third-party gas sale by M/s Konnect Gas (Private) Limited, a subsidiary of Jura Corporation (Annex-A).

TI Pakistan had pointed out serious allegations against violation of Pakistan Petroleum (E&P) Rules 2001 and OGRA License by M/s Konnect Gas (Pvt) Ltd for its illegal activities of providing unprocessed gas to CNG stations posing threat to the lives of citizens. On TI Pakistan's letter, the Prime Minister of Pakistan took notice of the complaint and the PM Office on 16-10-2023 directed the Petroleum Division to furnish comments regarding TIP complaint at the earliest (Annex-B).

OGRA had written a letter to M/s Spud Energy on 06/10/2023 and intimated that M/s Konnect Gas is not a licensee of OGRA to undertake any regulated activity and that M/s Spud Energy is required to furnish comments within 14 days (Annex-C).

On 5th January 2024, OGRA informed TI Pakistan via Pakistan Citizen Portal that both M/s Spud Energy Pty Ltd and M/s Konnect Gas Pvt. Ltd are not the licensee of OGRA and M/s Spud Energy operates as an upstream entity and falls under the jurisdiction of the DG PC, Ministry of Energy (Annex-D).

Transparency International Pakistan has received another complaint against M/s Jura Energy Corporation subsidiaries namely M/s SPUD Energy PVT Ltd and Konnect Gas Pvt. Ltd regarding violation of rules and regulations (Annex-E).

The complainant has made the following allegations:

1. SEPL has failed to address the grave issues of termination of production for over 90 days and the unlawful sale of unprocessed gas to its affiliate and an unlicensed entity Konnect Gas (KGPL).
2. OGRA has officially confirmed the invalid license status of KGPL and that SEPL is in breach of illegally selling the gas as an environmental hazard and facilitating its unauthorized sale to end consumers through CNG stations, executed via its affiliate, KGPL.
3. SEPL is in serious breach and is engaged in unregulated activities outside the purview of the regulatory framework, including the following.
 - a. Illegal sale of unprocessed gas
 - b. Illegal sale of unprocessed gas from expired lease
 - c. Illegal sale of unprocessed gas as an environmental hazard
 - d. Illegal sale of unprocessed gas to end consumers through CNG stations endangering lives of the people.
 - e. Non-payment of statutory Government obligations
 - f. Termination of Sale for over 90 days as per Rule 43 of the 1986 Rules
 - g. Non-compliance of operating with the principal of Good Oil Field Practices



Transparency International Pakistan Comments:

Transparency International Pakistan has reviewed the allegations of the complaint, prima facie, the allegations seem correct and are self-explanatory.

1. OGRA had written a letter to M/s Spud Energy on 06/10/2023 and intimated that M/s Konnect Gas is not a licensee of OGRA to undertake any regulated activity and that M/s Spud Energy is required to furnish comments within 14 days (Annex-F).
2. OGRA's response to TI Pakistan vide Pakistan citizen portal dated 5th January (Annex-G) clarifies that SEPL is a subsidiary of Jura Energy and KGL is an affiliate of Jura Energy, thus establishing a connection between SEPL and KGL as related parties.
3. As per OGRA, as an upstream entity, M/s SPUD Energy is regulated by applicable rules of Ministry of Energy (Petroleum Division)

Transparency International Pakistan Recommendations

Transparency International Pakistan requests Director General Petroleum Concessions (PC) to kindly look into the allegations of the complaint, and if it is found to be correct, take action against M/s SEPL for the alleged malpractices of providing unprocessed gas to CNG stations posing threat to the lives of citizens, under applicable laws and rules.

Transparency International Pakistan is striving for across the board application of Rule of Law, which is the only way to stop corruption, and achieve Zero tolerance against corruption.

With Regards,


(Advocate Daniyal Muzaffar)
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for the information with request to take action under their mandate to:

1. Principal Secretary to PM, PM House, Islamabad
2. Minister, Ministry of Energy, Islamabad
3. Chairman, OGRA, Islamabad
4. Chairman, Prime Minister Inspection Commission, PMIC, Islamabad
5. Registrar, Supreme Court of Islamabad, Islamabad.

Note:

This is to clarify that Transparency International Pakistan is not a complainant, it acts as a whistleblower and operate under Article 19-A, of the Constitution of Pakistan which gives the right to public to know how government is being run by public officers. Article 19-A makes the right to access of information pertaining to a public authority a fundamental right, and a three member bench in case of Mukhtar Ahmad Ali vs the Registrar, Supreme Court of Pakistan, Islamabad, headed by Chief Justice Qazi Faez Isa in the landmark judgment on 16 October 2023, in CP No. 3532/2023, has declared that

“What previously may have been on a need-to-know basis Article 19A of the Constitution has transformed it to a right-to-know, and the Access to information is no longer a discretion granted through occasional benevolence, but is now a fundamental right available with every Pakistani which right may be invoked under Article 19A of the Constitution”

2nd October, 2023

TL2023/1002/1A

Director General Petroleum Concessions,
Directorate General Petroleum Concessions,
Ministry of Energy (Petroleum Division),
Islamabad.

Sub: Complaint on the Violation of Pakistan Petroleum (E&P) Rules 2001 and Natural Gas Regulatory (Licensing) Rules 2002 due to Unauthorized Third-Party Gas Sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation

Dear Sir,

Transparency International Pakistan has received a Complaint on the Violation of Pakistan Petroleum (E&P) Rules 2001 and Natural Gas Regulatory (Licensing) Rules 2002 due to Unauthorized Third-Party Gas Sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation (Annex-A).

The complainant has made the following allegations:

That;

1. M/s Konnect Gas (Pvt.), a subsidiary of M/s Jura Energy Corporation, is an unlicensed entity which is providing unprocessed gas to CNG stations posing threat to the lives of citizens.
2. In 2020, M/s Jura Energy Corporation publicly announced through a press release (Annex-B) the commencement of gas sales from the Sara Suri Leases to M/s Konnect Gas under the guise of a third-party arrangement. The website of Jura Energy also reflects M/s Konnect Gas as the buyer to the Sara Suri Fields (Annex-C).
3. M/s Konnect Gas knowingly and willfully have engaged in the unlawful sale of unprocessed gas since 2020.
4. In April 2019, M/s Konnect Gas submitted its license application to OGRA which OGRA unequivocally rejected in April of 2022 due to M/s Konnect Gas's failure to meet the stipulated criteria (Annex-D).
5. However, despite OGRA's rejection of M/s Konnect Gas application for license, the company has been illegally supplying unprocessed gas to CNG stations.
6. Jura Corporation's subsidiaries, Spud Energy Pvt Ltd, Frontier Holdings Ltd have already been declared Defaulters by the Ministry of Energy – Directorate General Petroleum Concessions (DGPC).

Transparency International Pakistan Comments

Transparency International Pakistan has reviewed the allegations of the complaint, prima facie, the allegations seem correct.

Following are TI Pakistan comments:

1. On 16th December 2022, Transparency International Pakistan received another complaint against M/s SPUD Energy and M/s Frontier Holdings, subsidiaries of Jura Corporation for deliberately defaulting on their financial obligations, failing to pay approximately PKR 1.13 billion in outstanding royalties, which accounts for 12.5% of the proceeds from the sale of natural gas and crude oil from various fields.



2. On TI Pakistan letter, the Prime Minister took action and the the Ministry of Energy (Petroleum Division) successfully recovered an amount of PKR 1.13 billion from M/s SPUD and M/s Frontier and deposited in national exchequer (Annex-E)
3. On September 08, 2023, OGRA vide its letter No. OGRA-6(1)-KGL/2019 has clarified that due to constant failure by M/s Konnect Gas to submit requisite data/information for 2.5 years, the authority rejected the application of M/s Konnect Gas (Pvt.) Ltd on 15-04-2022 and that the company is not a Licenses of OGRA to undertake any regulated activities (Annex-F)

Transparency International Pakistan Recommendations

Transparency International Pakistan requests Director General Petroleum Concessions to kindly look into the allegations of the complaint, and if it is found to be correct, take action against M/s Konnect Gas (Pvt) Ltd for its illegal activities of providing unprocessed gas to CNG stations posing threat to the lives of citizens, under applicable laws and rules.

Transparency International Pakistan is striving for across the board application of Rule of Law, which is the only way to stop corruption, and achieve Zero tolerance against corruption.

With Regards,


(Advocate Daniyal Muzaffar)
Trustee/Legal Advisor
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3. Chairman, Prime Minister Inspection Commission, PMIC, Islamabad
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5. Registrar, Supreme Court of Islamabad, Islamabad.

Note:

This is to clarify that Transparency International Pakistan is not a complainant, it acts as a whistleblower and operate under Article 19-A, of the Constitution of Pakistan which gives the right to public to know how government is being run by public officers. Article 19-A makes the right to access of information pertaining to a public authority a fundamental right, Justice Syed Mansoor Ali Shah in his landmark judgment in case of Ataulah Malik v. Federation of Pakistan includes following order.

Right to information is another corrective tool which allows public access to the working and decision making of the public authorities. It opens the working of public administration to public scrutiny. This necessitates transparent and structured exercise of discretion by the public functionaries. Article 19-A empowers the civil society of this country to seek information from public institutions and hold them answerable. PLD 2010 Lahore 605.

2nd November, 2023

TL2023/1102/1A

Principal Secretary to Caretaker PM,
PM House,
Islamabad.

Sub: Complaint on the Violation of Pakistan Petroleum (E&P) Rules 2001 and Natural Gas Regulatory (Licensing) Rules 2002 due to Unauthorized Third-Party Gas Sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation.

Dear Sir,

Transparency International Pakistan refers to its letter No. TL2023/1002/1A dated 02 October 2023 on complaint on the violation of Pakistan Petroleum (E&P) Rules 2001 and Natural Gas Regulatory (Licensing) Rules 2002 due to Unauthorized Third-Party Gas Sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation (Annex-A).

TI Pakistan had pointed out serious allegations against violation of Pakistan Petroleum (E&P) Rules 2001 and OGRA License by M/s Konnect Gas (Pvt) Ltd for its illegal activities of providing unprocessed gas to CNG stations posing threat to the lives of citizens. On TI Pakistan's letter, the Prime Minister of Pakistan took notice of the complaint and the PM Office on 16-10-2023 directed the Petroleum Division to furnish comments regarding TIP complaint at the earliest (Annex-B).

OGRA had written a letter to M/s Spud Energy on 06/10/2023 and intimated that M/s Konnect Gas is not a licensee of OGRA to undertake any regulated activity and that M/s Spud Energy is required to furnish comments within 14 days (Annex-C).

Transparency International Pakistan has received another complaint against M/s Jura Energy Corporation subsidiaries namely M/s SPUD Energy PVT Ltd and Konnect Gas Pvt. Ltd regarding violation of rules and regulations (Annex-D).

The complainant has made the following allegations.

That;

1. The Sara Suri leases had expired in February 2020. Despite the expiration of the leases, M/s Spud Energy initiated operations and continues to operate within the expired leases.
2. During the operation of the expired leases, M/s Spud Energy engaged in the unlawful sale of unprocessed gas to the unlicensed entity, Konnect Gas, whereby OGRA vide letter No. OGRA-6(1) – KGL/2019 dated September 08, 2023 had explicitly stated that Konnect Gas has never been granted a license from OGRA to transport and sell natural gas (Annex-E).
3. OGDCL, a Joint Venture Partner in the Sara Suri JV, has already suspended gas sales to Konnect Gas in lieu of the expired lease and violation of regulatory and contractual obligations by M/s Spud Energy.
4. The parent company, Jura Energy Corporation has publicly acknowledged that M/s Spud Energy engaged in illegal gas sales from the Sara Suri Leases to the unlicensed entity, Konnect Gas, as evidenced by their own publication (Annex-F).



Transparency International Pakistan Comments

Transparency International Pakistan has reviewed the allegations of the complaint, prima facie, the allegations seem correct and are self-explanatory.

Following are TI Pakistan comments:

1. The culpability of malpractice and illegal activity by M/s SPUD and the parent company M/s Jura Energy Corporation for its illegal activities to sale gas to an unlicensed entity and providing unprocessed gas to CNG stations posing threat to the lives of citizens, require stern action by the Government of Pakistan under relevant laws and regulatory framework.
2. On 16th December 2022, Transparency International Pakistan received another complaint against M/s SPUD Energy and M/s Frontier Holdings, subsidiaries of Jura Corporation for deliberately defaulting on their financial obligations, failing to pay approximately PKR 1.13 billion in outstanding royalties, which accounts for 12.5% of the proceeds from the sale of natural gas and crude oil from various fields.
3. On TI Pakistan letter, the Prime Minister took action and the the Ministry of Energy (Petroleum Division) successfully recovered an amount of PKR 1.13 billion from M/s SPUD and M/s Frontier and deposited in national exchequer (Annex-G)
4. It appears that M/s Spud Energy and Konnect Gas from 2020 onwards have engaged in violation of Pakistan Petroleum (E&P) Rules 2001 and Natural Gas Regulatory (Licensing) Rules 2002.

Transparency International Pakistan Recommendations

Transparency International Pakistan requests the Caretaker Prime Minister of Pakistan to look into the allegations of the complaint, and if found correct, ensure all the requisite measures are taken by the Federal Government to take appropriate action against Unauthorized Third-Party Gas Sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation, posing direct threat to the lives of the citizens.

The new allegations that the parent company, Jura Energy, has publicly acknowledged that Spud Energy engaged in illegal gas sales from the Sara Suri Leases to the unlicensed entity, and that M/s Spud Energy has despite the expiration of the Sara Suri leases, continues to operate within the expired leases, must be investigated under relevant laws and regulatory frameworks.

Transparency International Pakistan is striving for across the board application of Rule of Law, which is the only way to stop corruption, and achieve against Zero tolerance against corruption

With Regards,


(Advocate Daniyal Muzaffar)
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for the information with request to take action under their mandate to:

1. Principal Secretary to PM, PM House, Islamabad
2. Minister. Ministry of Energy, Islamabad
3. DG Petroleum Concessions, Ministry of Petroleum, Islamabad
4. Chairman, Prime Minister Inspection Commission, PMIC, Islamabad
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“What previously may have been on a need-to-know basis Article 19A of the Constitution has transformed it to a right-to-know, and the Access to information is no longer a discretion granted through occasional benevolence, but is now a fundamental right available with every Pakistani which right may be invoked under Article 19A of the Constitution”

PM takes notice of un-authorized third-party gas sale by Konnect Gas

By

TOP NEWS UPDATES

October 23, 2023

Ahmad Ahmadani



ISLAMABAD: Caretaker Prime Minister Anwar ul Haq Kakar has taken notice on the complaint of Transparency International Pakistan (TIP) regarding unauthorized third-party gas sale by Konnect Gas (Private) Limited to the Compressed Natural Gas (CNG) stations.

Prime Minister has taken notice of the complaint of TIP on the violation of Pakistan Petroleum Rules (E&P) Rules, 2001 and Natural Gas Regulatory (Licensing) Rules, 2002 due to unauthorized third-party gas sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation and PM's Office on 16-10-2023 has directed the Petroleum Division to furnish comments regarding TIP complaint at the earliest.

It is relevant to note here that Transparency International Pakistan (TIP), in a letter dated October 2, 2023, titled "Complaint on the Violation of Pakistan Petroleum (E&P) Rules 2001 and Natural Gas Regulatory (Licensing) Rules 2002 Due to Unauthorized Third-Party Gas Sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation," to Director General (DG) Petroleum

Annex-C & F

Concession (PC), Ministry of Energy (Petroleum Division), requested to look into the allegations of the complaint and if found to be correct, take action against M/s Konnect Gas (Pvt.) Ltd for its illegal activities of providing unprocessed gas to CNG stations posing threat to the lives of citizens under applicable laws and rules.

Earlier, Petroleum Division's Director General Petroleum Concessions (DGPC), in a notice under Rule 68 (a) of Petroleum (Exploration and Production) Rules 1986 for illegal sale of natural gas by M/s Spud Energy Pty Ltd. from the Sara and Suri D&PLS to the unlicensed entity M/s Konnect Gas Pvt. Ltd dated 13th October 2023 to Chief Executive Officer (CEO), Spud Energy Pty Limited, has asked to explain within 60 days from the issuance of this notice to remedy the breach, or where the breach is not capable of being remedied, offer reasonable compensation within 60 days. If Spud Energy fails to satisfy the Authority within 60 days, the office of SGPC will initiate action against the company in accordance with applicable PCA/Rules, said a notice of DGPC to Chief Executive Officer (CEO), Spud Energy Pty Ltd.

The DGPC, in its notice, said that House of Magna Cum Laude (HoMCL) has written a letter to OGRA on 18/08/2023 inquiring about the OGRA license of M/s Konnect Gas Pvt. Ltd (KGPL) to undertake the regulated activity of gas sale. And, OGRA vide its letter No. OGRA-6(1)-KGL/2019 dated 08/09/2023 responded to HoMCL intimating that M/s KGPL failed to secure a license under the NGRA Rules, 2000 and stated that M/s KGPL is not a licensee of OGRA to undertake the regulated activities.

According to DGPC notice to CEO of SEPL, HoMCL filed a complaint against M/s SEPL and M/s KGPL on 12/09/2023 with the office of DGPC, requesting to inquire into the matter of the illegal sale of natural gas by M/s SEPL to M/s KGPL.

HoMCL submitted further grievances in continuation of its complaint vide its letter dated 21/09/2023 to the office of DGPC. Wherein, it was intimated that M/s Konnect Gas is not a licensee of OGRA, that M/s Spud Energy has been illegally selling unprocessed gas to M/s Konnect Gas since year 2020, and that M/s Konnect Gas is further selling the unprocessed gas to CNG stations/end consumers, posing direct threat to the lives of the people.

HoMCL, in another letter dated 26/09/2023 to OGRA, intimated that the unprocessed gas is being sold by M/s Konnect Gas to CNG stations in Sukkur (Sindh).

It is also learnt from DGPC notice to CEO, SEPL that Transparency International filed a complaint against M/s Spud Energy and M/s Konnect Gas on illegal sale of natural gas on 02/10/2023 to the office of DGPC. Wherein, it was intimated that M/s Spud Energy has been selling unprocessed gas to M/s Konnect Gas, and that M/s Konnect Gas is selling unprocessed gas to CNG stations/end-consumers, posing direct threat to the lives of the citizens.

The DGPC notice further discloses that OGRA had written a letter to M/s Spud Energy on 06/10/2023 and intimated that M/s Konnect Gas is not a licensee of OGRA to undertake any regulated activity and that M/s Spud Energy is required to furnish comments within 14 days.

It is worth mentioning here that M/s Spud Energy (SEPL) is 60 percent working interest owner and operator in the Sara & Suri Development and Production Leases.



Complaint History

JAN 5
2024



FROM
Chairman, Oil & Gas
Regulatory Authority (OGRA)

STATUS

Forwarded



TO
Director General (PC)

REMARKS

تبصرہ

Dear Citizen

It is apprised that both M/s Spud Energy Pty Ltd (SEPL) and M/s Konnect Gas Pvt. Ltd (KGL) are not the licensees of OGRA, and consequently do not fall within the purview of the applicable OGRA rules i.e. NGRA (Licensing) Rules, 2002. It is pertinent to note that M/s Spud Energy (SEPL) operates as an upstream entity and falls under the jurisdiction of the DG PC, Ministry of Energy.

It may further be noted that House of Magna Cum Laude (HoMCL) in its letter dated 14-11-2023 informed that SEPL is a subsidiary of Jura Energy and KGL is an affiliate of Jura Energy, establishing a relationship between SEPL and KGL as related parties. Given this, M/s Spud Energy, as an upstream entity, is regulated by MoE (PD) according to the relevant

TO
Director General (PC)

REMARKS

تبصرہ

Dear Citizen

It is apprised that both M/s Spud Energy Pty Ltd (SEPL) and M/s Konnect Gas Pvt. Ltd (KGL) are not the licensees of OGRA, and consequently do not fall within the purview of the applicable OGRA rules i.e. NGRA (Licensing) Rules, 2002. It is pertinent to note that M/s Spud Energy (SEPL) operates as an upstream entity and falls under the jurisdiction of the DG PC, Ministry of Energy.

It may further be noted that House of Magna Cum Laude (HoMCL) in its letter dated 14-11-2023 informed that SEPL is a subsidiary of Jura Energy and KGL is an affiliate of Jura Energy, establishing a relationship between SEPL and KGL as related parties. Given this, M/s Spud Energy, as an upstream entity, is regulated by MoE (PD) according to the relevant rules, therefore, the instant complaint has been forwarded to the upstream regulator DG PC for appropriate action under the applicable rules please.



HOUSE OF MAGNA CUM LAUDE

Barristers & Masters at Law

Annex-E

Director General Petroleum Concessions,
Directorate General Petroleum Concessions,
Ministry of Energy (Petroleum Division),
3rd Floor, Petroleum House,
Attaturk Avenue, G-5/2,
Islamabad

Subject: Complaint Regarding Unauthorized Third-Party Gas Sale by Konnect Gas (Private) Limited, a subsidiary of Jura Corporation – Spud Energy Pty Ltd, Frontier Holdings Ltd and Konnect Gas Pvt Ltd

Dear Sir,

We understand that Spud Energy (SEPL) has submitted its comments vide its letter dated January 5, 2024, in response to the notice it received under Rule 68 of the 1986 Rules by the DGPC.

At the outset, we would like to highlight that SEPL has incorrectly referred to your office's letter No. 8(4) Spud, Suri Filed/2023-pt. Whereby, the subject letter highlights that SEPL is in breach of not discharging statutory Government obligations, of terminating production for more than 90 days in accordance with Rule 43 of the Rules 1986, and of not addressing the non-compliance of operating with the principal of sound operations.

Secondly, it is pertinent to mention that SEPL's statement of honoring its statutory obligations to the Government is false and misleading. We understand that the company has not discharged its obligations which have been long overdue. Moreover, the amount of royalty paid is notably disproportionate to the sales volume. SEPL must be held accountable for its failure to discharge government obligations promptly, especially in light of the illegal third-party sale.

Furthermore, SEPL remains silent and does not address the grave issues of termination of production for over 90 Days and the unlawful sale of unprocessed gas to its affiliate and an unlicensed entity, Konnect Gas (KGPL). Whereby, OGRA has officially confirmed the invalid license status of KGPL. In addition, SEPL is in breach of illegally selling the gas as an environmental hazard and facilitating its unauthorized sale to end consumers through CNG stations, executed via its affiliate, KGPL. SEPL is in serious breach of the above and has been unable to provide any plausible counter statement.

In conclusion we would like to highlight the following breaches on part of SEPL:

1. Illegal sale of unprocessed gas
2. Illegal sale of unprocessed gas from expired leases
3. Illegal sale of unprocessed gas as an environmental hazard
4. Illegal sale of unprocessed gas to end consumers through CNG stations endangering lives of the people
5. Non-payment of statutory Government Obligations
6. Termination of Sale for over 90 days as per Rule 43 of the 1986 Rules
7. Non-compliance of operating with the principal of Good Oil Field Practices

It is evident that both SEPL and its affiliate have engaged in unregulated activities outside the purview of the regulatory framework. We firmly assert that SEPL should be immediately held accountable for these malpractices, and instant revocation of the Sara Suri Leases and blacklisting of SEPL along with its affiliates and directors is warranted.

Sincerely,


Barrister Shahrukh Iftikhar
Managing & Founding Partner
House of Magna Cum Laude

Page 1 of 2

17 JAN 2024

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