

15 November 2024

**To Interested Parties  
Public Consultation**

Responses to:  
SAIMM Secretariat  
[saimmadmin@saimm.co.za](mailto:saimmadmin@saimm.co.za)

**RE: Revised SAMOG Code Formal Public Consultation Review and Approval**

Simplification Objective	
1	The Petroleum Resources Management System (PRMS) administered by international professional bodies has become the global reporting standard for O&G in preference to the Canadian Oil and Gas Evaluation Handbook (GOGEH). As a result, the SAMOG Code needed to be amended.
2	There was a need to assess product types particularly with the focus on Helium and Lithium brines'
3	Since the SAMOG Code incorporates the requirements for valuation rather than relying upon a companion Code the implications of the valuation requirements were reviewed.
4	Form 1 was revised.
5	The code was revised for readability.

I refer you to the attached document which is the final draft version of the revised SAMOG Code. The following points are relevant: -

- the original SAMOG Code 2015 Edition and revised in March 2017 was managed by the SAMOG Committee which had identified a number of issues of practical application by issuers on the JSE and those parties that might use it;
- a key matter was that the original code was prepared with the help of internationally recognized O&G experts primarily from Calgary. The Alberta Securities Commission (ASC) administers the National Instrument 51-101 as their O&G QRE reporting standard with their associated Canadian Oil and Gas Evaluation Handbook (COGEH). With the assistance of the ASC and in particular John Etherington and David Elliot (two doyens of the industry) the SAMOG Code was written, approved by the JSE and then ratified through the Financial Services Board of South Africa;

- since that time the Petroleum Resources Management System (PRMS) has become more prominent as a global reporting standard in the O&G industry. The PRMS is administered under the auspices of the AAPG and SPE and SPEE and the SAMOG Committee decided to align more to the PRMS rather than COGEH and the NI51-101;
- this review and re-write were guided by Peter Dekker as the previous Chairman of the SAMOG Committee who undertook the onerous task of document gatekeeper to manage the script with the strike out and underscores of changes as you see in this document submission for the SSC;
- we have aligned terminologies such as technical terms and some common terms with the SSC Codes such as the definition of Public Reports as an example;
- one topic of interest was the issues of “report date” “effective date” and “date of the preparation of the report”; and
- the track changes document should be sufficiently clear for parties to understand the significance of the changes.

Some key point includes the following: -

	Text	Rationale
	Note: Paragraph references refer to the current Requirements, unless otherwise stated	
1	<b>Introduction</b>	The Introduction has been heavily revised as indicated in the track changes version of the revised SAMOG Code.
2	<b>Minimum Standards</b> Ensuring clarity on the minimum standards.	The SAMOG code sets out a required minimum standard for Public Reporting of Resource and Reserve information on Oil and Gas Activities
3	<b>Part 1 - Application</b> <b>Product Types</b>	Revision of the product types.  A) Gaseous Extraction: a. Carbon Dioxide b. Helium c. Hydrogen B) Solution Extraction C) Geothermal Water/Heart Sources  The change accords with PRMS.
4	<b>COGEH removed and replaced by PRMS</b>	Throughout the document since COGEH was considered too parochial.
6	<b>Part 6 Definitions</b>	Changes to Abandonment, Decommissioning and Reclamation as the generally accepted terms.

		<p>BOE Definition revised.</p> <p>Reference to Coal Bed Methane added.</p> <p>Crude oil definition changed.</p> <p>Gas hydrates changed.</p> <p>Natural Gas liquids.</p> <p>Reclamation removed and replaced by ADR.</p> <p>Synthetic crude added.</p>
7	<p><b>Form 1 A</b></p> <p><b>PART 1</b></p> <p><b>Instructions</b></p>	<p>(2) Removed as unnecessary and removal of obsolete numbering system.</p>
8	<p><b>Form 1 A</b></p> <p><b>PART 2</b></p> <p><b>Instructions</b></p>	<p>(2) removed as unnecessary and dates definitions aligned to SAMREC for standardisation.</p> <p>(7) Ditto</p>
9	<p><b>Form 1 A</b></p> <p><b>Part 3</b></p> <p><b>Item 3.2</b></p>	<p>Item 3.2 (b) removed as the weighted average concept was not considered appropriate.</p>
10	<p><b>Form 1 A</b></p> <p><b>Part 5</b></p> <p><b>Item 5.1</b></p>	<p>(a) Removed</p> <p>2 (a) Removed.</p>
11	<p><b>Form 1 A</b></p> <p><b>Part 6</b></p>	<p>Item 6.1 removed.</p>

We anticipate that once the Public Consultation process has taken place for a period of 30 calendar days any comments will be assessed and debated as necessary and once the SAMOG Committee approves the final clean document will be submitted to the SSC for formal ratification.

Please submit any comments formally to the email address above with Read Receipt confirmations to ensure the comments are successfully transmitted.

Yours faithfully



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