INTHEHIGHCOURTOFJUSTICEOFNIGERSTATE
MINNA JUDICIAL DIVISION
HOLDENATNEWBUSSA
SUITNO:NSHC/09/2025

BETWEEN:

1. **ABUBAKARMOHAMMEDMAIGIDA**
   (ForhimselfandonbehalfofCuzanCommunity)
2. **MUHAMMADKUDU** ..... **PLAINTIFFS**
   (ForhimselfandonbehalfofWuchiCommunity)

AND

MAINSTREAMENERGYSOLUTIONSLIMITED..... **DEFENDANT**

WRITTENSTATEMENTONOATHOFMRMOHAMMEDABDULLAHI

I, **MOHAMMED ABDULLAHI**, adult, male, Muslim, employee of the Defendant and Nigerian Citizen of 6 Yedseram Street, Maitama, Abuja, do solemnly and sincerely make oath and state as follows:

1. IamaHydrologistandamemberofHydrologicalSocietyofNigeriaandthe head of Hydrology Department, Jebba Hydro Power Plant, Jebba in the employment of the Defendant herein and by virtue of which position I am conversant with the facts of this case.

2. I have the Defendant's authority and consent to depose to this statement on Oath on its behalf.

3. IhavereadandunderstoodtheDefendant'sStatementofDefenceandthe facts deposed herein are within my personal knowledge, except where otherwise stated.

4. IhavepracticedasaHydrologistfor26yearsInvariouscapacitywithproper qualification and certification.

5. There had never been a time that the Defendant released water arbitrarily and without system control from any of its dams with adequate warning and sensitization to the general public.

6. The Defendant has always adequately notified all residents along the river route and that the Plaintiffs have failed to take cognizance of climate change and its attendant effects on humanity and general ecosystem.

7. The Defendant has at all material times carried out its operations with adequatecareanddiligence,includingtheregulatedreleaseofwaterfrom the Kainji and Jebba Dams, in strict adherence to:

    a. Allapplicableenvironmentalandoperationalsafetystandards,
    b. Statutoryandregulatoryobligations,and
    c. ProfessionalguidelinesissuedbytheNigerianHydrologicalServices Agency (NIHSA), the National Emergency Management Agency (NEMA), and other competent authorities.

8. ThewaterdischargeoperationsofJanuaryandApril2025were:

    a. **Scientificallyadvised**andtechnicallynecessarytopreservethe structural integrity of the dams and prevent catastrophic failure;
    b. **Scientificallyimplementedbasedonreal-timehydrological forecasts and analyses from my department;**
    c. Precededby**sensitization**campaignsandpublicwarningsissued via radio, television, billboards, leaflets, and direct community engagement.
    d. **natural seasonal overflow of the River Niger**, a trans boundary water body spanning over 4,000 kilometers, whose upstream and downstream dynamics are not wholly within the control of the Defendant.

9. The water from the dam at any point was released in specific measure per cubic meter (cumec) in accordance with regulated capacity and specification of the dams.

10. Particularly, the Jebba dam is designed to release up to 10,000 cumec per day at full operational capacity, if all the 6 turbines are working and all the spillway gates are opened.

11. However, from December 2024, only 4 of the turbines of the 6 installed turbines at Jebba were working and would not require release of the maximum water for the dam.

12. Thedamdidnotreleasemorethananaverageof3,000cumecofwaterper day from December 2024 till today.

13. The alleged flooding of the Plaintiffs' community could be as a result from floodingfromdownstreamordischargefromanyofthetributariesflowing River Niger or River Benue.

14. Arivermayflowbackwardoncetheinflowwaterisabovetheriverlevel.

15. Ialsoknowasafactthatanareacannotbefloodedexceptitisafloodplain or flood prone area due to river overflow.

16. Anareathatisnotonafloodplainorfloodpronecanonlybefloodedduring torrential rain fall which could also be the cause of the alleged flooding of the Plaintiffs' community.

17. Thedamsandturbinesaredesignedtoreleasewateratanytimeoftheyear where overflow may pose a risk to dam safety or turbine operations, and such releases are not restricted to August or any particular month. The stakeholders, local authorities, and farming communities downstream are always carried along through timely notifications and sensitization measures before any controlled release of water.

18. TheDefendantplacedjinglesonradio/televisionstations,andhavepictorial banners, did letters to communities and leaflets of sensitization about prospective release of water from the dam.

19. Anydamageallegedlysufferedbythe Plaintiffswasoccasionedeitherby:

    a. Theircontinuedoccupationofflood-proneareasdespiteadvisorynotices and relocation guidance, or

    b. Thenaturalseasonaloverflowof theRiverNiger,andnotbyany negligent or wrongful act of the Defendant.

20. TheDefendanthasinvestedsubstantiallyindownstreamfloodmanagement, environmental responsibility, and community relations, and maintains a professional and people-centric approach in its operations.

21. The Defendant contends that the alleged damage suffered by the Plaintiffs might have resulted from:

    a. Their **continued occupation of flood-prone areas**, in contravention of advisory notices and relocation guidance issued by government authorities due to the alluvial nature of the water route to agriculture/farming and/or

    b. **The natural seasonal overflow of the River Niger**, a transboundary water body spanning over 4,000 kilometers, whose upstream and downstream dynamics are not wholly within the control of the Defendant.

    c. The flooding might have even been caused flows from downstream tributaries.

17. I know as a fact that the River Niger is subject to **complex hydrological influences**, including rainfall patterns across West Africa and water flow from multiple tributaries or downstream, over which the Defendant exercises no authority and the release of water from other countries on the line of flow of the water body particularly the Lagdo dam in Cameroun.

18. The Defendant categorically denies liability for the sum of **₦5,000,000,000.00 (Five Billion Naira)** or any other sum whatsoever and states that the claims for damage are:

    a) **Grossly exaggerated**, speculative, and unsupported by empirical evidence;

    b) Based on **misrepresentation of facts**, and

    c) Motivated by an **intent to extract unwarranted compensation.**

19. The Niger State Government has already engaged with the Defendant on this matter, and the Defendant has **provided full disclosures and cooperation** in good faith.

20. The Defendant has invested substantially in community relations, environmental responsibility, and downstream flood management projects, and that its corporate reputation has been unfairly targeted by the Plaintiffs' public claims and litigation.

21. The sum of ₦5,000,000,000.00 (Five Billion Naira) claimed by the Plaintiffs is Grossly exaggerated, speculative, and unsupported by empirical evidence.

22. The claims of the Claimant are gold-digging, blatant, ungroundable, obnoxious, bogus and unfounded based on lies and manipulation of facts.

23. I urge the Court to dismiss the claims of the Plaintiffs in its entirety with punitive cost.

24. That I swear to this Affidavit in good faith believing its content to be true in accordance with the Oath Act, 2004.

DEPONENT

Sworn to at the High Court of Niger State Registry This
15TH MAY day of May 2026.

Before Me
Commissioner of Oath

HIGH COURT OF JUSTICE
COMMISSIONER FOR OATH
NASIRU DADA
SIGN
NIGER STATE OF NIGERIA 15/05/2026

Witness Statement on Oath — ₦500.00

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15/05/2026