



BABS AKINWUMI & CO.

Legal Practitioners, Arbitrators and Consultants

22nd May 2025.

The Principal Partner,
Levite Solicitors & Arbitrators
Block 15D, Salis Court, Efire Ilogun Street,
(Around Jabi Airport Junction)
Gwarinpa II, Abuja.

Attention: **Dayo G. Ashonibare Esq.**

Sir,

**RE: LETTER OF DEMAND FOR COMPENSATION: LOSSES RESULTING FROM
FLOODING CAUSED BY MAINSTREAM ENERGY SOLUTIONS LIMITED'S
UNANNOUNCED RELEASE OF WATER FROM ITS DAM FACILITY WITHOUT
ADEQUATE WARNING OR MITIGATION MEASURES**

Your letter of 18th May 2025 on the above subject refers.

We are solicitors to Mainstream Energy Solutions Limited (MESL) and write this letter upon its instructions concerning your defamatory letter dated 1st March 2024 with the above title.

We write in response to your letter under reference, in which your client makes unsubstantiated allegations of negligence against our client.

It is our considered view that your client, in briefing you, either deliberately misrepresented the facts, acted based on speculation, or was unduly motivated by a desire to unjustly extract monetary compensation. Such conduct suggests either a willful intent to mislead or a desperate attempt to profit without cause.

We categorically state that our client bears no responsibility whatsoever for the unfortunate circumstances your client alleges. For the record, our client maintains the highest standards regarding safety and environmental

management and operates in strict adherence to all regulatory and compliance requirements.

The water discharge from our client's dam in January and April 2025 was carried out systematically and in full compliance with expert recommendations and industry best practices. These activities were also preceded by multiple public notices and sensitization campaigns aired on local radio and television stations in Niger State, ensuring adequate public awareness.

It is apparent that your client may have established their operations in a flood-prone area, contrary to state-issued directives advising against occupation or activity in such zones. Consequently, any loss allegedly suffered is self-inflicted and cannot be attributed to our client.

Furthermore, for your client's benefit, we emphasize that the River Niger spans approximately 4,180 kilometers, originating from the Guinea Highlands and flowing through several West African countries before reaching the Niger Delta. It is self-evident that our client cannot be held accountable for natural hydrological events occurring along such an extensive and transboundary watercourse, over which it has no control outside its operational jurisdiction.

It may also interest you to know that the Niger State Government has already engaged our client on this matter, and our client has duly responded with clarity and transparency.

In light of the above, we reiterate that our client cannot be held liable for the alleged flooding or for the grossly exaggerated claim of damage amounting to NGN 5,000,000,000.00 (Five Billion Naira) across two communities in Niger State.

We therefore advise your client to explore alternative avenues, as our client will not accept responsibility for losses it did not cause. Your demand consequently is misdirected to our client.

Finally, be advised that our client will vigorously pursue all available legal remedies to resist any attempt by any individual or group to malign its reputation or subject it to blackmail. Should defamatory or misleading



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statements persist, we shall not hesitate to file a counterclaim for any damages arising from such conduct.

Accept please our utmost professional regards.

Yours faithfully,



B. S. Akinwumi Esq.
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