

***Auditor-
General for
the
Federation***

Investigative
Forensic Audit
into the
Allegations of
Unremitted
Funds into the
Federation
Accounts by the
NNPC

February 2015





Office of the Auditor-General for the Federation
Abuja
Nigeria

2 February 2015

Dear Sir,

REPORT ON THE INVESTIGATIVE FORENSIC AUDIT INTO THE ALLEGATIONS OF UNREMITTED FUNDS INTO THE FEDERATION ACCOUNTS BY THE NNPC

Per our engagement letter dated 5 June 2014, PricewaterhouseCoopers Limited (“PwC”) has performed the investigative forensic audit into the alleged unremitted funds into the Federation Accounts by the Nigerian National Petroleum Corporation (“NNPC”) between January 2012 and July 2013.

Our services were performed and this Report was developed in accordance with our engagement letter dated 5 June 2014 and subject to the terms and conditions included herein.

Our Scope of work included the following:

1. Analysis of remittance shortfalls from NNPC into the Federation Accounts;
2. Analysis of submissions made by key stakeholders in relation to these alleged shortfalls; and
3. Producing an independent Forensic report detailing our findings.

The procedures we performed did not constitute an examination or a review in accordance with generally accepted auditing standards or attestation standards. Accordingly, we provide no opinion, attestation or other form of assurance with respect to our work or the information upon which our work was based.

Our report, submitted on 28 November 2014, was limited to the specific procedures and analysis described herein and was based only on the information made available through 31 October 2014. In adherence to your instruction dated 7 January 2015, we have received and analysed further information made available by NNPC subsequent to 28 November 2014 through 29 January 2015. Accordingly, changes in circumstances after this date could affect the findings outlined in this Report.

This Report and all PwC deliverables are intended solely for the Office of the Auditor-General for the Federation, for their internal use and benefit and are not intended to nor may they be relied upon by any other party (“Third Party”). Neither this deliverable nor its contents may be distributed to, discussed with, or otherwise disclosed to any Third Party without the prior written consent of PwC. PwC accepts no liability or responsibility to any Third Party who gains access to this deliverable.

We appreciate the opportunity to assist you with this matter.

Yours faithfully

For: PricewaterhouseCoopers Limited

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1. Background

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1.1. Introduction

The Office of the Auditor-General for the Federation (AuGF) engaged PricewaterhouseCoopers Limited (PwC) to investigate any and all crude oil revenues generated by the Nigerian National Petroleum Corporation (“NNPC”) that was withheld or unremitted to the Federation Accounts between 1 January 2012 and 31 July 2013.

In November 2014, we submitted a report of our work in which we indicated that the findings in our report were based on the information we had received up until 31 October 2014 and that any subsequent information received could change aspects of our report.

In January 2015, we were recalled by the Auditor General for the Federation and asked to visit with NNPC (the nominal Auditee) to share our key findings and receive feedback from them. We have now done so and a significant amount of additional information and clarification was received during this process.

This Report has significant changes from the previous report, although covering the same period and issues primarily because a significant amount of additional information has been provided, enabling us to change some of our previous positions in the light of new and additional evidence.

As this is our definitive report on this forensic work/exercise, all previous positions taken or views expressed are henceforth invalid and only the views and positions presented in this report are our views and findings with regard to this engagement.

1.2. History of allegations

This project follows the timeline of events beginning with a letter in September 2013 by the former Governor of the Central Bank of Nigeria (“CBN”), HRH Sanusi Lamido Sanusi (“The Governor”) to the President of the Federal Republic of Nigeria, Dr Goodluck Ebele Jonathan GCFR, stating that from January 2012 to July 2013, NNPC had lifted \$65bn worth of crude on behalf of the FGN but remitted only \$15.2bn into the Federation Accounts¹, with \$49.8bn as outstanding to the FGN.

25 September 2013

Ex-CBN Governor in a letter to the President, alleged that NNPC had not remitted \$49.8bn worth of oil revenue.

18 December 2013

Reconciliation Committee estimated unremitted funds at \$10.8bn. CBN stated the amount is \$12bn.

13 February 2014

NNPC provided explanations of the \$20bn shortfall.
Finance Minister/Coordinating Minister for the Economy recommended the conduct of an independent Forensic Audit.

13 December 2013

NNPC responded that no money is missing. Reconciliation Committee (comprising representatives of (i) CBN (ii) NNPC (iii) DPR (iv) FIRS (v) OAGF (vi) The Budget Office of the Federation (vii) Federal Ministry of Finance (viii) Federal Ministry of Petroleum Resources) was set up.

4 February 2014

CBN informed Senate Committee on Finance that NNPC needs to account for \$20bn as the CBN could only confirm receipt of \$47bn out of \$67bn revenue.

5 June 2014

PwC was officially appointed, by the office of the Auditor General of the Federation (AuGF), to conduct a forensic audit into the allegations

Finia

¹ NNPC/CBN JP Morgan Account, DPR/CBN JP Morgan Account, FIRS/CBN JP Morgan Account and CBN/NNPC Remittance Pool Account

The table below outlines NNPC’s reconciliation of the differences between revenues from crude oil liftings and cash remitted to the Federation accounts – January 2012 to July 2013 (review period)

Explanations extracted from NNPC’s presentations to the Senate Committee

Item	\$’ billion	Comment
Revenue generated	67.00	Revenue from the sale of crude oil during the review period.
Cost associated with the maintenance of strategic reserve	(0.46)	Demurrage and other costs incurred due to delay of vessels ready to discharge refined petroleum products and costs relating to storage of strategic reserves of finished petroleum products during the review period.
Crude oil and product losses	(0.76)	Value of crude oil and petroleum products lost as a result of pipeline vandalism and theft during the review period.
Pipeline maintenance and management costs	(0.91)	Deduction of direct costs incurred by NNPC to safeguard, repair and maintain the country’s petroleum products pipelines during the review period.
Other third party financing	(2.00)	Due to liquidity challenges, NNPC was funding Exploration and Production (Capex and Opex) using external lenders. In this instance, the NNPC and its Joint Venture (JV) partners form a Special Purpose Vehicle (SPV) which sources funds externally. The SPV repays the lender using crude oil from production. This deduction reflects the value of crude that was allocated and deducted to repay the lenders during the review period.
NPDC	(6.00)	This represents revenues generated by NPDC oil blocks. These revenues were withheld by NPDC during the review period, and not remitted into the Federation Accounts.
Subsidy payments (DPK, PMS, Q4 2011)	(9.97)	This represents amounts deducted by the NNPC for subsidy claims on PMS and DPK imports during the review period.
Total Remitted	<u>47.00</u>	This represents the net amount paid into the Federation Accounts out of the revenues generated during the review period.

Source: NNPC GMD’s Submission to the Senate (Exhibit A1), PwC Analysis

2. Executive Summary

(The executive summary is not a stand alone document, and must be read with the full report)

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2.1. Summary Findings

Based on the work conducted by our team from the commencement of this mandate up until 29 January 2015, our conclusions are as follows;

- **Total gross revenues generated from FGN crude oil liftings** was **\$69.34bn** and NOT \$67 billion as earlier stated by the Reconciliation Committee for the period from January 2012 to July 2013.
- **Total cash remitted into the Federation accounts** in relation to crude oil liftings was **\$50.81bn** and NOT \$47bn as earlier stated by the Reconciliation Committee for the period from January 2012 to July 2013.
- NNPC has provided information on the difference leading to a potential excess remittance of \$0.74 billion (without considering expected remittances from NPDC). Other indirect costs of \$2.81 billion which were not part of the submission to the Senate Committee hearing have been defrayed to arrive at this position.
- The resulting potential excess remittance indicates that the Corporation operates an unsustainable model. Forty six percent (46%) of proceeds of domestic crude oil revenues for the review period was spent on operations and subsidies. The Corporation is unable to sustain monthly remittances to the Federation Account Allocation Committee (FAAC), and also meet its operational costs entirely from the proceeds of domestic crude oil revenues, and have had to incur third party liabilities to bridge the funding gap. Furthermore, the review period recorded international crude oil prices averaging \$122.5 per barrel (Average Platts prices for 2012). As at the time of concluding this report, international crude oil prices average about \$46.07 per barrel², which is about sixty two percent (62%) reduction when compared to the crude oil prices for the review period. If the NNPC overhead costs and subsidies are maintained (assuming crude oil production volumes are maintained), the corporation may have to exhaust all the proceeds of domestic crude oil sales, and may still require third party liabilities to meet costs of operations and subsidies, and may not be able to make any remittances to FAAC.
- **We therefore recommend that the NNPC model of operation must be urgently reviewed and restructured, as the current model which has been in operation since the creation of the Corporation cannot be sustained.**
- The report reflects the fact that \$3.38 billion was spent on DPK subsidy for the review period. We also confirmed using third party vessel tracking platforms that all vessels carrying NNPC cargoes arrived in Nigeria within the periods disclosed by PPPRA.
- A major consideration centers on the ownership of oil and gas assets controlled by NPDC. Subject to additional information being provided, we estimate that the NNPC and NPDC should refund to the Federation Account a minimum of **\$1.48 billion** as summarised in the next page.
- A determination is required as to whether all or a portion of 'other costs not directly attributable to crude oil operations can be defrayed by NNPC.

² US Energy Information Administration data on indexmundi.com

Expected refund by NNPC to the FGN

Description	Summary of expected remittance to the Federation accounts by NNPC/ NPDC \$ billion	Comments
Duplicated PMS subsidy claim	0.02	
Duplicated DPK subsidy claim	0.04	
Subsidy computation errors	0.04	
Subsidy claim on un-incurred DPK cost	0.21	
Over-claim of subsidy for the review period	0.98	
Unsubstantiated costs and errors in cost schedules	0.78	
Additional cost provided between 12 January 2015 and 29 January 2015	(2.81)	
(Incurred deficit)/Expected refund by NNPC/NPDC to the FGN	(0.74)	
Unpaid signature bonus for divested assets	1.75	I
Unpaid NPDC self assessed taxes and royalties	0.47	I
Updated Expected refund by NNPC/NPDC to the FGN	1.48	
Amounts to be refunded by NPDC to the Federation accounts out of NPDC net revenues (dividends) ³ .		I
DPK Subsidy claims for the review period		II

³ We did not have access to NPDC's full accounts and records and we have not ascertained the amount of costs and expenses which should be applied to the US\$5.11billion Crude Oil revenue (net of royalties and PPT paid) per the NPDC submission to the Senate Committee which should be considered as dividend payment by NPDC to NNPC for ultimate remittance to the Federation Account.

- Between 12 January and 29 January 2015, NNPC provided transaction documents representing additional costs of \$2.81 billion related to the review period, citing the NNPC Act LFN No 33 of 1977 that allows such deductions. Clarity is required on whether such deductions should be made by NNPC as a first line charge, before remitting the net proceeds of domestic crude to the federation accounts. If these are deemed not to be valid deductions, then the amount due from NNPC would be estimated at \$2.07 billion (without considering expected known remittances from NPDC) or \$4.29 billion (if expected known remittances from NPDC are considered).
- The Corporation provided details of expenses to the tune of \$12.97 billion related to the review period, funded from the proceeds of domestic crude oil revenues. This is summarized in table (i) below

**Summary of domestic crude revenue and remittance by
NNPC (January 2012 - July 2013)**

Description	\$'billions
Revenue generated from domestic crude liftings (January 2012 to July 2013)	28.22
Revenue remitted from domestic crude liftings (January 2012 to July 2013)	(15.99)
Unremitted domestic crude revenue	12.23
Costs incurred by NNPC- (\$12.97billion)	
Verified PMS and DPK subsidy	(8.70)
Demurrage claims by counterparties on product-exchange arrangements	(0.14)
Verified Crude oil and product losses	(0.83)
Verified pipeline maintenance and management costs	(0.49)
Other costs incurred by NNPC not directly attributable to domestic crude (subsequently provided in 2015. See analysis in table (ii) below)	(2.81)
NNPC potential excess remittance	(0.74)

Table (i)

- A consideration of the total costs incurred and the amount remitted potentially led to an excess remittance of \$0.74bn by the Corporation during the review period as detailed in Table (ii) below:

Summary of crude oil revenue and remittance by NNPC (January 2012 - July 2013)

Description	\$'billions	Comments
Revenue generated per reconciliation committee	67.00	
Additional revenue generated upon our investigation	2.34	
Actual revenue generated	69.34	
Costs directly attributable to domestic crude	(1.46)	
Total other third party financing arrangement	(1.06)	
Equity crude oil processing cost	(0.13)	
Unremitted revenues – NPDC	(5.11)	I
PMS and DPK subsidy	(8.70)	II
Amount due	52.88	
Other costs not directly related to domestic crude oil operations- (\$2.81billion)		
Salaries and benefits	(1.52)	
Monthly operations	(0.48)	
Other third party payments (including training course fees, estacode, and consultancy fees, and other vendor payments)	(0.81)	
Expected remittance	50.07	
Actual remittance	50.81	
Potential excess remittance to the federation for the review period	(0.74)	

Table (ii)

- The Corporation represented that the potential excess remittance of \$0.74 billion was funded from proceeds of PMS sales for which the suppliers of the PMS are yet to be paid in cash or crude oil. As at the time of concluding this report, details of the affected suppliers that funded this potential excess remittance are yet to be provided by the Corporation.
- The analysis above and resulting potential excess remittance suggest the existence of liabilities to third parties incurred by the Corporation. We recommend the Corporation be required to disclose details of all existing liabilities and impact on proceeds of future crude oil sales.
- The Corporation is expected to operate in accordance with the NNPC Act LFN No 33 of 1977 which states in Chapter 320 Part I subsection 7(4) as follows:

“The Corporation shall maintain a fund which shall consist of-

(a) such moneys as may from time to time be provided by the Federal Government for the purposes of this Act by way of grants or loans or otherwise howsoever; and

(b) such moneys as may be received by the Corporation in the course of its operations or in relation to the exercise by the Corporation of any of its functions under this Act, and from such fund there shall be defrayed all expenses incurred by the Corporation.”

Accordingly, all the Corporations costs, and those of its loss making subsidiaries have been defrayed in the analysis provided by the Corporation for the review period. However, the profit making subsidiaries and dividends received have been excluded from the analysis provided. This suggests that there are other sources of net revenues available to the Corporation not currently disclosed. A proper estimate of the actual potential excess

remittance/under-remittance can only be arrived at if all revenues and all costs of the Corporation and all its subsidiaries are accounted for in a consolidated position. A detailed review of this was beyond the scope of our mandate.

We therefore recommend that NNPC be required to disclose the consolidated position of the Group and its subsidiaries, and expected remittances to the Federation accounts be determined from the available consolidated net revenues. Furthermore, the nature of costs that are allowable should be pre-determined by all relevant parties.

We also recommend that the NNPC act be reviewed as the content contradicts the requirement for NNPC to be run as a commercially viable entity. It appears the act has given the Corporation a "Blank" cheque to spend money without limit or control. This is untenable and unsustainable and must be addressed immediately. The Corporation should be required to create value, and meet its expenses entirely from the value created. Proceeds from the FGN's crude oil sales should be remitted entirely to the Federation accounts. Commissions for the Corporation services can then be paid based on agreed terms.

Comments

- I. We did not obtain any information directly from NPDC, but in accordance with NPDC former Managing Director's (Mr Briggs Victor) submission to the Senate Committee hearing on the subject matter, for the period, NPDC generated \$5.11billion (net of royalties and petroleum profits tax paid).

We have relied on the Legal Opinion provided to the Senate Committee by the Attorney General (AG) on the subject of the transfers of various NNPC (55%) portion of Oil leases (OMLs) involved in the Shell (SPDC) Divestments which impact crude oil flows in the period. The AG's opinion indicated that these transfers were within the authority of the Minister to make. Thus, these assets were validly transferred to NPDC. The same AG's Legal Opinion also indicated that NPDC was to make payments for Net Revenue (dividend) to NNPC, which should ultimately be remitted to the Federation Account. A sale will mean the following should be due to be remitted to the Federation accounts

1. Petroleum Profit Taxes (PPT)
2. Royalties
3. Signature bonus payment
4. Dividend from profit for the period (according to dividend declared in line with NPDC's dividend policy)

We have not obtained any information that suggests that NPDC has been assessed for PPT and Royalty for the review period. However, as disclosed by the former MD of NPDC at the senate hearing, NPDC had done a self assessment of PPT and Royalty and had unpaid self assessed PPT and Royalty to the tune of \$0.47 billion related to the review period.

In January 2015 (subsequent to our initial reported conclusions), we were availed with copies of Deeds of Assignment for OML's 26,30,40,42. We were not provided with copies of Deeds of Assignment for OML's 4,38,41,34. We were also provided

with information which indicated that the various NNPC (55%) portion of Oil leases (OMLs) involved in the Shell Divestments related to the eight (8) OML's aforesaid, were transferred to NPDC for an aggregate Sum of US\$1.85billion. So far, only the amount of US\$100m had been remitted in relation to these assets. This means that the amount of US\$1.75billion is yet to be remitted in relation to this transfer. In addition, by a comparison of the aggregate amount of US\$1.85billion determined by DPR as the transfer value, and the (arm's length) commercial value paid for by 3rd parties for between 30% to 45% divested by Shell, we arrive at an estimated Alternative Commercial Valuation of US\$3.4billion for the NNPC 55%. The point here is that while we appreciate that this is a government entity to government entity transaction, we had expected a transfer basis higher than the US\$1.85billion commercial value determined by DPR. We have not performed a professional valuation and therefore recommend that the valuation done by DPR be re-assessed. NNPC explained that these OML transfers were in the bid to encourage local participation in the Nigerian upstream Oil and Gas Industry

We also expect that NPDC should remit dividends to NNPC and ultimately the Federation accounts, based on NPDC's dividend policy and declaration of dividend for the review period. We did not have access to NPDC's full accounts and records and we have not ascertained the amount of costs and expenses which should be applied to the US\$5.11billion Crude Oil revenue (net of royalties and PPT paid) per the NPDC submission to the Senate Committee hearing in order to arrive at the Net Revenue (in line with the AG's Opinion), which should be subjected to dividend remittance. We are also not aware that NPDC declared dividend for the review period.

These matters need to be followed up for final resolution in terms of the NPDC Net Revenue (dividend) for Crude Oil relating to the transfers, PPT and royalty unremitted, and the transfer price valuation and remittance.

- II. We determined from information obtained from PPPRA that \$3.38 billion relating to DPK subsidy cost was incurred by the NNPC for the review period. We obtained a letter, dated 19 October 2009 written by the Principal Secretary to the President, to the National Security Adviser (The following were in copy: Honourable Minister for Petroleum Resources, Honourable Minister of State for Petroleum Resources, Group Managing Director NNPC, and the Executive Secretary PPPRA), confirming a Presidential directive of 15 June 2009 instructing that subsidy on DPK be stopped (Exhibit D7). We also obtained a letter dated 16 December 2010 from the Executive Secretary PPPRA to the CBN Governor clarifying that PPPRA had ceased granting subsidy on Kerosene since the Presidential directive of 15 June 2009 (Exhibit D8). Furthermore, Kerosene subsidy was not appropriated for in the 2012 and 2013 FGN budget.

However, the Presidential Directive was not gazetted and there has been no other legal instrument cancelling the subsidy on DPK.

In a Presidential media chat on 24 February 2014, The President and Commander in Chief of the Armed Forces of the Federal Republic of Nigeria, President Goodluck Ebele Jonathan, asserted that kerosene subsidies have not been disallowed.

We therefore recommend that an official directive be written to support the legality of the kerosene subsidy costs. This should also be followed by adequate budgeting and appropriation for the costs.

Other Findings

- For the period reviewed, we identified possible errors in the computation of crude oil prices at the NNPC that resulted in a \$3.6 million shortfall in incomes to the Federation account. The major beneficiaries were Fujairah Refinery - \$805,545, NNPC (KRPC/WRPC) – \$697,995 and NNPC (COMD) - \$2,107,275. Subsequent to our identification of this issue, NNPC has amended the errors, and have reflected the amendments in the remittances to FAAC in October 2014.
- Our review of the DPK sales process revealed that NNPC sells DPK to bulk DPK marketers in Nigeria at ₦40.90 per litre at a location on the coastal waterways (off shore Lagos). The expected/official regulated retail price of DPK in Nigeria is ₦50 per litre. This retail price of ₦50 comprises the Ex-depot price of ₦34.51 and a Margin of ₦15.49. NNPC should be required to explain the reason for selling DPK at ₦40.90, rather than the regulated Ex-depot price of ₦34.51. The Corporation should also be required to explain the reason for selling DPK to bulk DPK marketers at a location on the coastal waterways (off shore Lagos) rather than at the in-country depots.

NNPC explained that the contract the Corporation executes with the kerosene marketers confirms NNPC (PPMC) is responsible for the delivery of DPK to marketers at their assigned depots on shore. The Corporation further explains that the kerosene marketers however opt to receive the product off shore Lagos. The Corporation further explains that the DPK sales price per litre off shore Lagos includes the following:

	Naira
<i>Approved sales price</i>	<i>34.51</i>
<i>Bridging allowance</i>	<i>5.85</i>
<i>Marine Transportation Allowance</i>	<i>0.15</i>
<i>PPPRA Admin Charge</i>	<i>0.15</i>
Total	40.66
<i>Unexplained charge</i>	<i>0.24</i>
Sales price off shore Lagos	40.90

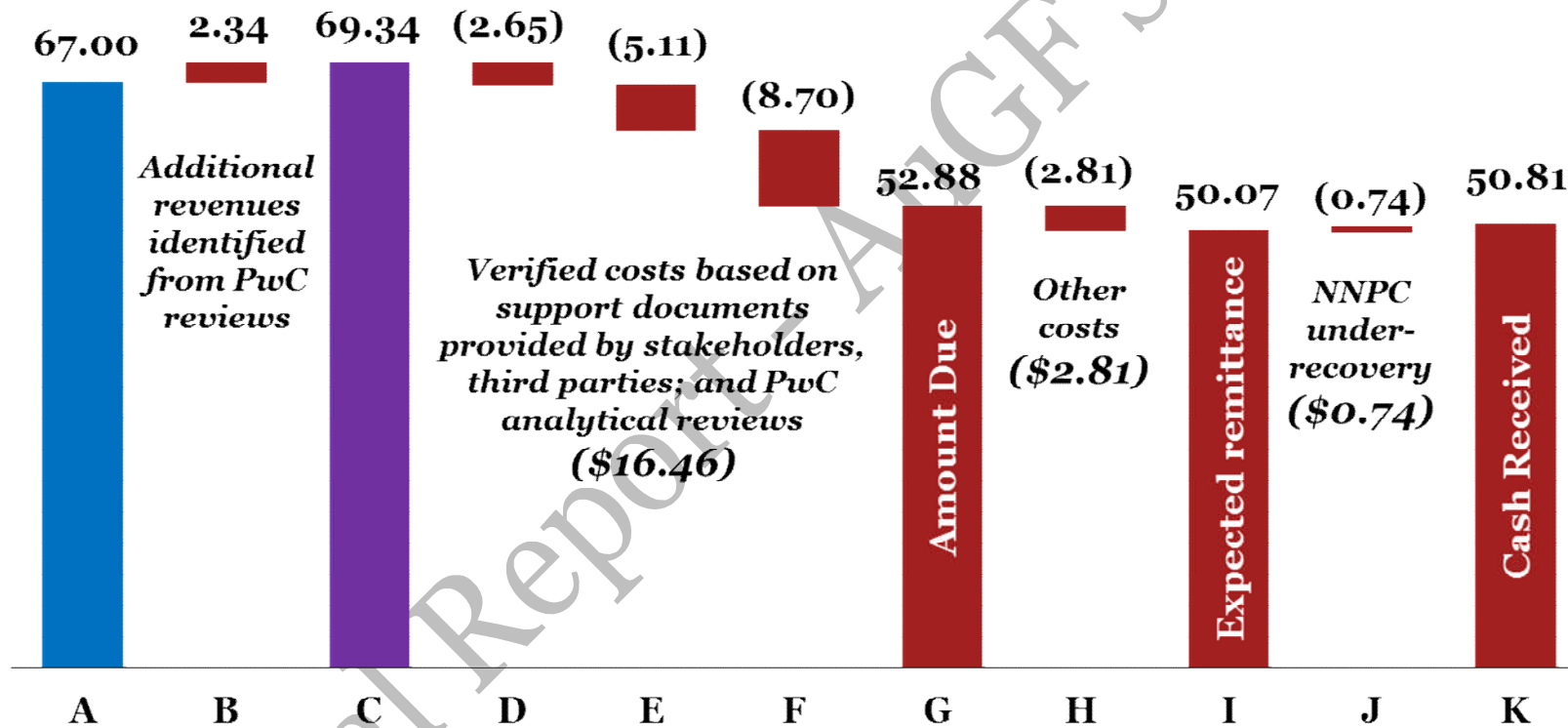
- The accounting and reconciliation system for crude oil revenues used by Government agencies appear to be inaccurate and weak. We noted significant discrepancies in data from different sources. The lack of independent audit and reconciliation led to over reliance on data produced from NNPC. This matter is further compounded by the lack of independence within NNPC as the business has conflicting interests of being a stand-alone self-funding entity and also the main source of revenue to the Federation account.

2.2. Our approach to this mandate

- It is important to note that although PwC has reviewed documents submitted by the key stakeholders involved, our work was conducted independently, and our findings are based on the review of documentation, analytical reviews of data, and interviews conducted.
- Due to this approach, our findings and the way we presented them in this report may not necessarily reflect the formats of the various submissions made by the different stakeholders.
- In certain instances where we were not provided with information or access to key stakeholders (Section 6.3.2) we leveraged on external and available sources of information to reach our conclusions. These external and available sources of information are clearly highlighted in the relevant sections of this report.
- Any information and/or documentation which may come to our attention subsequent to the date of this report may alter our findings.
- We have also listed some of the limitations to our scope in Section 3.2.
- The procedures performed and specific limitations to scope are also discussed under the various work stream sections.
- Based on specific instructions from the Auditor General for the Federation, we returned to do additional work, after NNPC had represented that our initial process did not provide an opportunity for formal discussions of our findings with top management, in the form of an exit interview.
- With the exception of the Deputy Group Managing Director/ Group Executive Director Finance and Accounts of NNPC, the Auditor-General for the Federation, and the Honourable Minister of Petroleum Resources, we have not discussed the findings of this report with any stakeholder.
- Our work was split into two work streams as follows;
 1. We estimated how much revenue is due to the FGN from crude oil liftings; and
 2. We reconciled the revenues due to the FGN against the actual cash received by the federation.
- Our findings and conclusions considered the impact of some matters which require legal opinion to be sought by the FGN.

2.3. Our findings

Crude liftings from January 2012 – July 2013 (\$billions)



The table below explains our findings in relation to the chart above

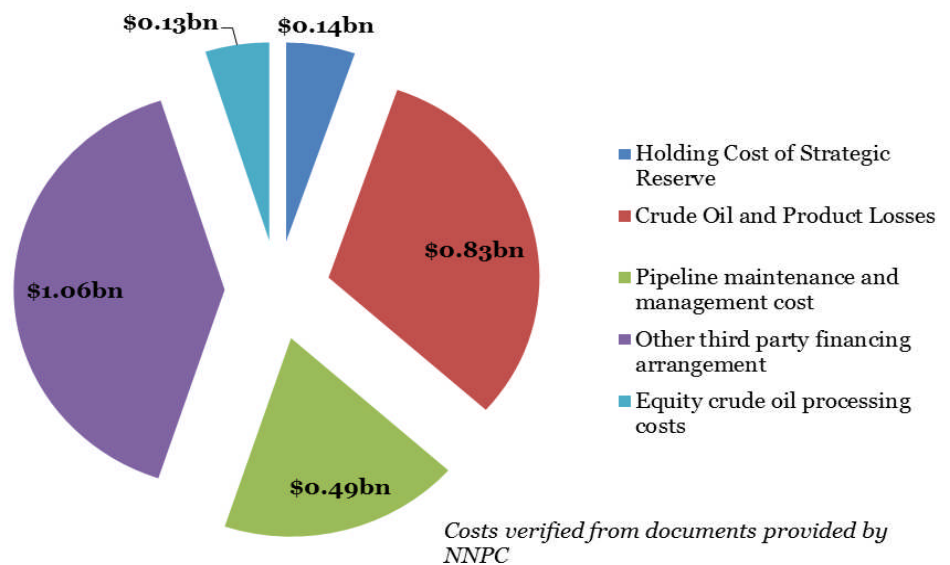
A Revenue generated (\$67billion) This is the estimated revenues from crude oil liftings, as reported by the Reconciliation Committee.

B This represents additional revenues identified by PwC that were not captured in the Report of the Reconciliation Committee (\$2.34billion)

Description	Increase / (Decrease) \$'Billion
I. Exported equity crude	0.29
II. Domestic crude revenue	0.22
III. FIRS tax oil	1.00
IV. DPR royalty crude oil	(0.42)
V. NPDC crude oil	0.82
VI. Other Third Party Financing	0.43
TOTAL	2.34

C PwC estimated revenue from crude oil lifting (\$69.34billion) This is the total amount of revenue from crude oil liftings during the review period, after increasing A by the adjustments in B.

D Direct Costs (\$2.65billion) This represents the total expenses incurred and/ deducted directly by NNPC (from crude oil revenues) where supporting documents were provided to PwC.



Source: PPMC's Schedule of Costs, Reconciliations signed off by traders and NNPC, PwC Analysis

These costs relate to amounts incurred by NNPC (and its subsidiaries) in executing its mandate. We observed that there were documents supporting these expenses.

For the purpose of this report, PwC has included these expenses as verified, and treated them as legitimately incurred in the process of the Corporation executing its mandate.

Verified costs (NPDC yet to complete payment for assigned assets).

It is important to note that the relationship between NNPC and NPDC as it relates to OMLs 30, 34, 40, 26, 4, 38, 41, 42 controlled by NPDC, is a key limitation to our scope. We had no access to NPDC management; our work relied on discussions with NNPC management (Section 6.3.2) and review of submissions to the senate (Exhibit A1).

From our reviews of the NNPC Act (section 6(1 c & d)), we noted that the Corporation is empowered:

(c) to enter into contracts or partnerships with any company, firm or person which in the opinion of the Corporation will facilitate the discharge of the said duties under this Act;

(d) to establish and maintain subsidiaries for the discharge of such functions as the Corporation may determine;

Sections 6(1c & d) are critical to establishing the nature of sale of these OMLs. We have analysed these as follows:

(Factors supporting a sale)

1. NPDC paid taxes and royalties with a total of \$1.7 billion. We have not been able to establish the assets on which these taxes and royalties were paid. However, the practice of payment of these statutory deductions suggests that the revenues from the related assets belong to the Company. According to NPDC's submission at the senate hearing, NPDC has not been assessed for royalty and PPT for the review period by DPR and FIRS respectively. The Company made part payments based on estimates.
2. Existence of a Deed of Assignment: As part of our work, we were informed of a document (Deed of Assignment) that transferred the assets from NNPC to NPDC. We were availed with copies of Deeds of Assignment for OML's 26,30,40,42. We were not provided with copies of Deeds of Assignment for OML's 4,38,41,34.
3. An outright sale to NPDC means that NPDC would be expected to make a payment to the Federation accounts for procuring the asset. DPR assigned a total value of \$1.85 billion dollars as reasonable amounts to be paid for the eight OML's in consideration, out of which the Corporation had paid \$100 million.

An outright sale will also require dividend remittance by NPDC to NNPC (and

This represents the revenues due to NPDC from crude oil sale for the period from January 2012 to July 2013. The balances used in this analysis were obtained from the submissions made by the former MD of NPDC Mr Victor Briggs, during the Senate Committee hearings. We could not find proof or evidence that these revenues were remitted by NPDC/NNPC into the Federation Accounts

E

thus the FGN), depending on the dividend policy of NPDC (NNPC is the sole owner of NPDC). See analysis of NPDC's submission at the senate hearing below:

Analysis of NPDC submissions

Description	Amount (\$)
Total revenues from NPDC assets	6,815,188,626
Total PPT paid	(863,000,000)
Total Royalties paid	(838,991,619)
Total revenues less payment already made	5,113,197,007

Senate hearing submissions, PwC analysis

Total amounts estimated to have been withheld by NPDC on assumption of a sale of the divested assets is \$5.11 billion.

Verified costs requiring legal opinion

The FGN should seek legal opinion on:

1. Legitimacy of DPK subsidy

We were not provided with any document evidencing the Federal Government's approval for the continuation of DPK subsidy. However, in a Presidential media chat on 24 February 2014, The President and Commander in Chief of the Armed Forces of the Federal Republic of Nigeria, President Goodluck Ebele Jonathan, confirmed the Federal Government's position, that the kerosene subsidies have not been disallowed.

2. NNPC's right to deduct subsidy from amounts due to the FGN for the sale of domestic crude, instead of retrospective claim as done by other marketers

The role of NNPC in the downstream sector is to refine petroleum products and subsequently sell to bulk traders and retailers. Due to the decline in local refining capacity and increased domestic consumption, NNPC has resorted to importing products to compensate for the shortfall.

The FGN subsidises the cost of petroleum products imported or refined locally. Typical process preceding subsidy claims includes verification and certification by PPPRA of the product type, volume and specification of the imported or refined petroleum product before the subsidy is claimed and paid.

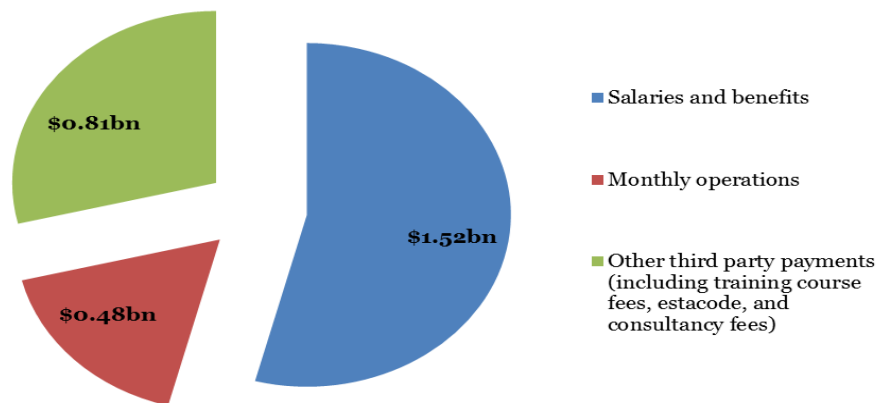
This reflects amounts deducted by NNPC as subsidy claims on PMS - \$5.32billion & DPK - \$3.38billion (Total \$8.70billion)

F These costs were verified based on documents received from PPPRA. We have however deducted the errors noted in these documents, before arriving at the verified amounts.

NNPC (PPMC) does not claim subsidy retrospectively as done by other marketers. PPMC buys 445,000 bpd of domestic crude oil from the FGN. PPMC is expected to pay for the domestic crude oil 3 months after the purchase from the FGN. This period is to allow PPMC convert the crude oil to refined products, sell the refined products, and pay the FGN for the crude purchased, from the proceeds of sale of the refined products⁴. However, NNPC (PPMC) sells the refined products at a subsidised amount, and pays the FGN for the crude purchased less subsidy incurred during the sale of the refined products.

G Amount Due (\$52.88billion) Amount expected to be remitted to the Federation after deducting the total verified costs from the total revenues from crude lifting, i.e., C-D-E-F.

H Other costs not directly attributable to domestic crude oil (\$2.81billion)



Additional costs information provided by NNPC after submission of our initial report

After the submission of our initial report to the Auditor-General for the Federation on 28 November 2014, these costs were brought to our attention by NNPC; stating that it had understated its costs in the submissions made to the Senate Committee and had not included all the costs defrayed from the proceeds of domestic crude revenue in meeting its mandate in accordance with the NNPC Act. These costs comprise of what was incurred by NNPC and its loss making subsidiaries.

We obtained physical records of these costs and compared them to the Group’s accounting records on SAP.

I Expected remittance (\$50.07billion) This is the total amount of revenue expected in the Federation Account after deducting H from G.

⁴ Obtained from discussions with NNPC and Revenue Mobilisation and Fiscal Allocation Commission

J	NNPC Potential excess remittance (\$0.74billion)	This amount represents the additional costs incurred by the Corporation and its subsidiaries not funded from the proceeds of domestic crude oil sale. The Corporation claims the potential excess remittance was funded from proceeds of PMS sales for which the suppliers of the PMS are yet to be paid in cash or crude oil. Details of the affected suppliers that funded this potential excess remittance are yet to be provided by the Corporation.
K	Revenue remitted (\$50.81billion)	Total amount remitted as traced to the Federation Account.

The sections below explain the differences in data submitted by the Reconciliation Committee and PwC data used in our analysis.

We were not provided with the source of the data used by the Reconciliation Committee in arriving at its conclusions

2.4. Revenue Generated

- **\$2.34 billion under-reported revenue generated**

The total revenue generated from our analysis of all crude oil revenue streams amounted to \$69.34 billion. This was \$2.34 billion higher than the amount reported by the Reconciliation Committee. The difference was as a result of the following;

- A. FIRS – Data received from both COMD and FIRS put revenue generated from FIRS tax oil lifting at \$16 billion which is \$1 billion higher than the amount quoted by the Reconciliation Committee.
- B. NPDC – Information submitted by NPDC to the Senate Committee stated total revenue generated from lifting at \$6.82 billion. This is \$0.82 billion higher than the Senate Reconciliation Committee's figure.
- C. Third Party Financing – Data received from COMD and confirmed by Mobil Producing Nigeria Limited (MPNL) and Total E&P Nigeria Limited (TEPNL) during their submissions at the senate hearing, revealed total revenue figures of \$2.43 billion. This is \$0.43 billion higher than the amount reported by the Reconciliation Committee.
- D. Our analysis also revealed increased revenue of \$0.29 billion and \$0.22 billion from Equity and Domestic crude oil lifting respectively, and a reduction of \$0.42 billion from DPR royalty revenue, when compared to Reconciliation Committee's figures.

2.5. Revenue Remitted

- **Under-reported revenue remittance of \$3.81bn**

The total cash remitted into the Federation accounts from crude oil liftings for the period under review amounted to \$50.81 billion. We were able to trace \$49.33bn of this amount to the FGN bank accounts listed in Appendix 6.1.33. The balance of \$1.48 billion was also traced to the FAAC report for subsequent months. Please refer to Section 4.2.7 for more details.

\$3.81 billion is the difference between \$50.81 billion and the \$47 billion amount reported by the Senate Reconciliation Committee. This difference was as a result of the following:

- A. FIRS remittance – We verified additional \$1 billion revenue generated by FIRS which was not reported by the Reconciliation Committee. We also traced the payment of this amount to the CBN/FIRS JP Morgan account.

- B. Other third party financing remittance – \$1.37billion was received from the third party financing arrangements. The arrangement with TEPNL resulted in the payment of \$211million to the Federation from the USAN Field TMP project which represents Royalty and Profit oil, while the sum of \$1.16billion was received from MPNL from the Satellite Field and Reserve Development projects.
- C. NPDC remittance – Cash payments of \$1.7billion representing Petroleum Profit Tax and Royalties had been remitted.
- D. Equity crude and DPR royalty oil remittance – The remittance received from Equity crude sales, and in favour of DPR royalty oil, was \$0.16 billion higher and \$0.42billion lower than the Senate Reconciliation Committee figures respectively.

2.6. Other Third Party Financing Arrangements

• Under-reported Third Party Financing Revenue of \$0.43 billion

Mobil Producing Nigeria Limited, in its submission to the Senate, reported revenue figures of \$518million⁵ and \$859million⁶ in respect of the Reserve Development Project (RDP) and Satellite Field Development Project (SFD) respectively. Total E&P reported a revenue figure of \$1.053 billion⁷ in respect of the USAN project. These amounts represent royalty and profit oil due to the Federation from these third party financing arrangements. The total revenue generated from third party financing arrangement was \$2.43billion and not \$2 billion reported by the Reconciliation Committee.

• Undisclosed remittance to the Federation account

Out of the total revenue reported by MPNL, \$1.158billion⁸ had been remitted to the Federation Account as at November 2013. This was confirmed by the Office of the Accountant General of the Federation at the presentation to the Senate Committee. We also traced these payments to the CBN/NNPC JP Morgan account. The total of \$858,750,972 relating to SFD had been remitted while \$300,000,000 out of the \$518,069,354 relating to RDP had been remitted. The balance of \$218,069,354 was withheld to service the project finance cost and subsequent remittance of the net amount, in accordance with the contract terms.

In respect of the USAN project handled by Total E&P Nigeria Limited, the sum of \$193,478,061.15 and \$17,943,616 totaling \$211,421,677⁹, being Royalty and Profit Oil was remitted to the Federation account

⁵ See Appendix 6.1.13 – RDP valuation

⁶ See Appendix 6.1.14 – SFDP valuation

⁷ See Appendix 6.1.15 – Usan valuation

⁸ See Appendix 6.1.9 – Mobil remittance

⁹ See Appendix 6.1.8 – TEPNG remittance

2.7. PMS and DPK Subsidy

- **\$0.98 billion over claim of subsidy by NNPC**

Our review of the subsidy documentation revealed that the subsidy due to NNPC between January 2012 and July 2013 on PMS and DPK import was \$8.99billion compared to the \$9.97 billion stated by the Reconciliation Committee. The difference was due to the following:

- Exclusion of October 2011 - December 2011 subsidy claims of \$1.2billion. This does not relate to the review period of January 2012 to July 2013.
- \$0.13billion increase in PMS subsidy claimed for the 19 months period.
- \$0.09billion increase in DPK subsidy claimed for the 19 months period.

- **Duplicated discharges noted in subsidy computations**

Our examination of the PMS and DPK import verified by PPPRA revealed that some discharges were apparently verified and subsidy advised to NNPC more than once.

The repeated subsidy for PMS amounted to ₦3,709,879,190 (\$23,954,796).

The repeated subsidy for DPK amounted to ₦6,169,502,266 (\$39,836,652).

- **\$36.05 million over-statement in PPPRA's PMS subsidy Payment Advice to NNPC**

- Our review of the Subsidy Payment Advice sent by PPPRA to NNPC for discharges between January 2012 and July 2013 revealed that PPPRA applied the pre-2012 Ex-Depot Price (₦49.51) on some discharges in 2012 instead of the approved Ex-Depot Price of ₦81.51.
- A total of 174,449,778 litres of PMS was affected in these PPPRA computations.
- The error in computation resulted in an over-statement of PMS subsidy by ₦5.6 billion (\$36.05 million).

- **Estimated \$205 million DPK subsidy over-charge by NNPC**

- Our review of a sample of the copies of the Pro Forma Invoices (PFIs) issued to the other marketers of DPK across different geopolitical zones of Nigeria, revealed that the other marketers bought DPK from NNPC/PPMC prior to arrival at NNPC depot in Nigeria at ₦40.90.
- The marketers are thereafter required to incur the Lightering expenses¹⁰, NPA charges, Jetty Throughput Charge and Storage Charges before bringing the product into Nigeria.
- Subsidy is calculated as Landing Cost minus Ex-Depot Price;

¹⁰ NNPC claimed that this cost is incurred by both NNPC and the marketers. For the purpose of this report, we have considered this cost as a cost incurred by the marketers. Over-charge of subsidy above depends on PPPRA's decision to either consider this cost in favour of NNPC or in favour of marketers of kerosene.

- Per PPPRA's template, Landing Cost also includes the extra expenses incurred by the other marketers.
- By selling DPK to marketers at ₦40.90 and claiming subsidy at an Ex-depot price of ₦34.51 without adjusting the Landing Costs for the extra costs borne by the marketers, NNPC had over deducted subsidies to an estimated amount of ₦31,522,234,881.06 (\$204 million).

2.8. NPDC lifting

- **Under-recognition of NPDC liftings by \$0.82billion by Reconciliation Committee**

The Reconciliation Committee put the value of liftings in favour of NPDC at \$6billion. We did not receive any supporting documentation from NPDC to validate this figure other than the submission to the Senate by the former MD of NPDC, Mr Victor Briggs, who disclosed the total value of NPDC liftings from all its assets as \$6.82billion.

While we were unable to verify the \$6.82 billion directly at NPDC, we performed a recomputation of the values of liftings using information provided by COMD and arrived at a value of \$5.65 billion¹¹. Discussions with COMD revealed that lifting data captured by COMD for NPDC might not be complete as COMD does not capture liftings done directly by NPDC's Strategic Alliance Partners. Volumes recorded by DPR for NPDC did not contain the necessary pricing information for valuation.

- **Cash payments of \$863 million by NPDC to FIRS not captured by Reconciliation Committee**

For the period under review, NPDC was yet to be assessed for tax by the FIRS. However, the company made several cash payments during and after the period which amounted to \$863million. These payments were confirmed by FIRS to have been received. We also traced the payments to CBN/FIRS bank statements with JP Morgan.

- **Cash payments of \$839 million by NPDC to DPR not captured by Reconciliation Committee**

For the period under review, NPDC made several payments to DPR based on self-estimated royalty. We traced several cash payments made by the company to CBN/ DPR JP Morgan account statement, to the tune of \$839 million.

¹¹ Appendix 6.1.1 – Valuation of crude oil revenue (NPDC section)

2.9. Pipeline maintenance and management costs

- **Additional \$2.8billion cost communicated by NNPC**

After the submission of our initial report to the Auditor-General for the Federation on 28 November 2014, the following was brought to our attention by NNPC regarding Pipeline Maintenance and Management Costs:

- Initial submission made to the Senate Committee was understated and did not include all the costs defrayed from the proceeds of domestic crude revenue by NNPC in accordance with the NNPC Act. These costs also largely include the amounts incurred by the Corporation's subsidiaries.
- The total additional costs amounting to \$2.81billion was funded from domestic crude revenue accruing from liftings of January 2012 to July 2013, and third party liabilities as follows:

Expense type	Total (\$)
Salaries and benefits	1,522,258,663
Monthly operations	478,684,782
Other third party payments (including training course fees, estacodes, and consultancy fees)	955,212,837
Total costs	2,811,153,197

2.10. Crude oil and product losses

- **Computation of Crude Oil loss**

NNPC used a conversion rate of \$100/barrel to value differences between the quantity of crude oil pumped at the terminals and quantity received at the refineries. We adopted the monthly average Platts¹² price to value the losses, considering that the revenue generated from Crude oil lifted during the review period had been accounted for using such Platts information instead of a fixed rate. Applying the monthly average Platts price to value the crude oil losses amounted to \$73,851,144.93¹³ higher than PPMC's computation.

¹² Platts is an Energy and commodity price reporting Agency

¹³ See Table G5 in Section 4.7.4.1

3. Overview

Final Report - AuGF's Copy

3.1. Detailed Timeline of Events

The assignment follows a timeline of events beginning with a letter in September 2013 by the former Governor of CBN, HRH Mallam Sanusi Lamido Sanusi to the President of the Federal Republic of Nigeria, Dr Goodluck Ebele Jonathan (GCFR) stating (among other allegations), that from January 2012 to July 2013, NNPC had lifted \$65bn worth of crude on behalf of the FGN but remitted only \$15bn, with \$49.8bn outstanding. The history of allegations is shown in the table below:

Date	Event
25 September 2013	Sanusi Lamido Sanusi, former CBN Governor, writes a letter to the President stating that from January 2012 – July 2013, NNPC had lifted \$65bn worth of crude on behalf of the FGN but remitted only \$15.2bn, thus \$49.8bn was outstanding.
13 December 2013	The former GMD NNPC (Andrew Yakubu) responds that no money is missing. A revenue reconciliation meeting was set up by the FGN to look into the allegations. The meeting had representatives from: (i) CBN (ii) NNPC (iii) Department of Petroleum Resources (DPR) (iv) Federal Inland Revenue Service (FIRS) (v) Office of the Accountant General of the Federation (OAGF) (vi) The Budget Office of the Federation (vii) Federal Ministry of Finance (viii) Federal Ministry of Petroleum Resources.
18 December 2013	After the reconciliation meeting, a joint press statement was issued by all the parties as follows: Actual value of crude lifted over the period was \$67bn which was accounted for as follows: (i) Revenues which directly accrued to NNPC (for the Federation Account) of \$14bn (ii) Additional revenues lifted by NNPC on behalf of other parties as follows: - FIRS (\$15bn) - DPR (\$2bn) - NPDC (\$6bn) - Other third party financing (\$2bn) (iii) Domestic crude lifted by the NNPC (\$28bn) The Ministry of Finance acknowledged that all crude lifted was remitted apart from domestic crude remittances with a shortfall of \$10.8bn, made up of: (i) Unpaid subsidy claims – USD 8.77billion (ii) Holding costs of strategic reserves – USD 0.46billion (iii) Crude oil and product losses – USD 0.76billion (iv) Pipeline and management costs – 0.91billion CBN Governor stated that the shortfall is \$12bn because, of the \$28bn due from the domestic crude, NNPC had only remitted \$16bn. NNPC insisted that the shortfall is \$10.8bn and the difference was due to \$1.2bn subsidy payments it claimed to have made between Jan-Mar 2012 (relating to October – December 2011 discharges), and which had been certified by the PPPRA. CBN did not recognize it as no documents were provided by NNPC to support the explanation.

Date	Event																														
4 February 2014	<p>The CBN Governor appearing before the Senate Committee on Finance stated that NNPC needs to account for \$20bn discounting some of the initial explanations provided by NNPC (the lifting in favour of NPDC, other third party financing and certified subsidy claims). The Governor stated that out of the \$67billion worth of crude oil lifted by the NNPC, only \$47billion had been appropriately accounted for as follows:</p> <table> <tr> <td>NNPC payment for FGN crude</td> <td>- \$14bn</td> </tr> <tr> <td>FIRS crude</td> <td>- \$15bn</td> </tr> <tr> <td>Domestic crude</td> <td>- \$16bn</td> </tr> <tr> <td>IOC payment(Royalty)</td> <td>- \$2 bn</td> </tr> <tr> <td>Total</td> <td>- \$47bn</td> </tr> </table>	NNPC payment for FGN crude	- \$14bn	FIRS crude	- \$15bn	Domestic crude	- \$16bn	IOC payment(Royalty)	- \$2 bn	Total	- \$47bn																				
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IOC payment(Royalty)	- \$2 bn																														
Total	- \$47bn																														
13 February 2014	<p>The NNPC accounted for the \$20bn shortfall as follows:</p> <table> <thead> <tr> <th>S/N</th> <th>Description</th> <th>\$billion</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>NPDC</td> <td>6</td> </tr> <tr> <td>2</td> <td>Other third party financing</td> <td>2</td> </tr> <tr> <td>3</td> <td>Jan – Mar 12 certified subsidy</td> <td>1.2</td> </tr> <tr> <td>4</td> <td>DPK subsidy</td> <td>3.5</td> </tr> <tr> <td>5</td> <td>PMS subsidy</td> <td>5.25</td> </tr> <tr> <td>6</td> <td>Crude oil product losses</td> <td>0.76</td> </tr> <tr> <td>7</td> <td>Maintaining the strategic reserves</td> <td>0.46</td> </tr> <tr> <td>8</td> <td>Pipeline maintenance and management costs</td> <td>0.91</td> </tr> <tr> <td></td> <td>Total</td> <td>20.08</td> </tr> </tbody> </table> <p>The Minister of Finance and Coordinating Minister of the Economy, recommended that there should be an independent forensic audit of the amounts constituting the \$10.8bn as stated on 18 December 2013.</p>	S/N	Description	\$billion	1	NPDC	6	2	Other third party financing	2	3	Jan – Mar 12 certified subsidy	1.2	4	DPK subsidy	3.5	5	PMS subsidy	5.25	6	Crude oil product losses	0.76	7	Maintaining the strategic reserves	0.46	8	Pipeline maintenance and management costs	0.91		Total	20.08
S/N	Description	\$billion																													
1	NPDC	6																													
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6	Crude oil product losses	0.76																													
7	Maintaining the strategic reserves	0.46																													
8	Pipeline maintenance and management costs	0.91																													
	Total	20.08																													

3.2. Scope Reconciliation

Below is a summary of the scope of the engagement as set out in the Terms of Reference, the status of work done and relevant comments regarding areas of departure from scope:

Objectives per engagement letter	Status	Scope changes (if any)	Comments
<p>Analysis of remittance shortfalls from NNPC into the Federation Accounts</p> <p>(i) \$49billion and later \$20billion by the CBN</p> <p>(ii) \$12billion by the Ministry of Finance</p>	Done	Not applicable	Remittance shortfalls appropriately analyzed
<p>Analysis of submissions by key stakeholders in relation to the alleged shortfalls</p> <p>(i) Working with the National Assembly and the AuGF to identify all submissions</p> <p>(ii) Reviewing all video records of the Senate Hearings, identifying oral submissions for prospective interviews</p> <p>(iii) Examining documents submitted by various agencies in respect of the allegations (NNPC and subsidiaries, CBN, PPPRA, FAAC, OAGF, MoF, FIRS, Others)</p> <p>(iv) Analysing and reconciling proceeds (cash and non-cash) from the sale of petroleum products (processed locally, exported, refined abroad under OPAs, SWAPS, etc) by NNPC and their remittance to the FGN</p> <p>(v) Independently verifying the quality of information received in respect of the alleged shortfalls</p>	Done	Not applicable	Performed objectives stated in scope
<p>Examine crude oil and gas production records covering:</p> <p>(i) Records of monthly crude oil and gas production in barrels/metric tonnes</p> <p>(ii) Schedule of domestic</p>	Done	We examined crude oil production records only rather than crude oil and gas as per the signed contract	We did this because the allegations on unremitted funds relate to revenues accruing from crude oil sales

Objectives per engagement letter	Status	Scope changes (if any)	Comments
<p>allocation of crude oil to NNPC in barrels and values in USD and ₦</p> <p>(iii) Crude oil allocated to refineries in barrels</p> <p>(iv) Crude oil processed by the refineries and the unutilized balance</p> <p>(v) Sale of balance of domestic allocation of crude oil allocated to NNPC</p> <p>(vi) Monthly production returns from refineries on product basis</p>			
<p>Examine crude oil and gas sales records covering:</p> <p>(i) Monthly sales of crude oil and gas (export and domestic) in barrels and metric tonnes</p> <p>(ii) Sales of crude oil and gas dedicated to specific projects – CBN and NNPC projects</p> <p>(iii) Average selling price of crude oil and gas on monthly basis</p> <p>(iv) Schedule of buyers of crude oil and gas showing detail of purchases (volume and value), the total payment made for the year's purchases and the outstanding balance standing against each</p> <p>(v) Contract agreements with crude oil and gas buyers</p> <p>(vi) Schedule of crude oil and gas debtors with the age analysis of the debts</p> <p>(vii) Schedule of demurrage incurred by crude oil and gas buyers on overdue debts and details of subsequent settlements</p> <p>(viii) Summary of monthly reconciliations and billing of crude oil and gas sales and</p>	Done	We examined crude oil sales records only rather than crude oil and gas as per the signed contract	We did this because the allegations on unremitted funds relate to revenues accruing from crude oil sales

Objectives per engagement letter	Status	Scope changes (if any)	Comments
receipts			
<p>Examine importation and sales of refined petroleum products covering:</p> <p>(i) Records of importation of petroleum products by NNPC giving details of each product</p> <p>(ii) Details of sales of imported petroleum products on monthly basis</p> <p>(iii) Schedule of subsidies deducted from sales of crude oil and gas for imported petroleum products</p>	Done	Not applicable	Performed objectives stated in scope
<p>Examine payment of crude oil and gas revenue to the Federation Account covering:</p> <p>(i) Foreign sales of crude oil and gas (USD)</p> <p>(ii) Domestic sales of crude oil and gas (₦)</p> <p>(iii) Excess crude oil and gas proceeds (foreign and domestic)</p> <p>(iv) Mandates sent to CBN by NNPC to transfer crude oil and gas revenue to the Federation Account and to excess crude account on a monthly basis</p>	Done	We examined crude oil sales records only rather than crude oil and gas as per the signed contract	We did this because the allegations on unremitted funds relate to revenues accruing from crude oil sales

3.3. Crude Oil Value Chain

The Nigerian Oil and Gas sector is split into two broad categories: the upstream and downstream sectors.

The upstream sector involves operations such as exploration, development, production and transportation of crude oil, while the downstream sector involves operations such as refining of crude into its various constituents, distribution and marketing.

In broad terms, the Federation's share of total crude lifted from oil terminals across the country can either be exported (Equity crude) or kept for conversion to refined products and sold locally (Domestic crude).

The Federation's equity interest, royalty interest, and PPT interest in crude oil production is sold to approved crude oil traders or off-takers and is exported with revenues accruing to the Federation. These revenues accrue through three main agents of government (i.e., Nigerian National Petroleum Corporation, the Department of Petroleum Resources, and the Federal Inland Revenue Service). The Central Bank of Nigeria maintains separate accounts with JP Morgan Chase for these agencies where funds from the applicable sale of crude by the off-takers are paid into.

The term Domestic Crude Oil refers to the 445,000 barrels per day of crude oil allocated to the NNPC out of the total crude oil production of the country for the purpose of domestic consumption. This quantity of 445,000 barrels per day was derived from the installed capacity of the four (4) local refineries situated at Port Harcourt (2 refineries), Warri and Kaduna. NNPC sells to PPMC to supply the nation's four refineries, while PPMC pays for the crude within 90 days using proceeds from refined product sales. NNPC is then expected to pay the FGN for this crude oil allocation at applicable international market prices.

The diagrams below summarize the value chain:

3.3.1. Overview of crude oil production and sales flow (Federation’s portion)

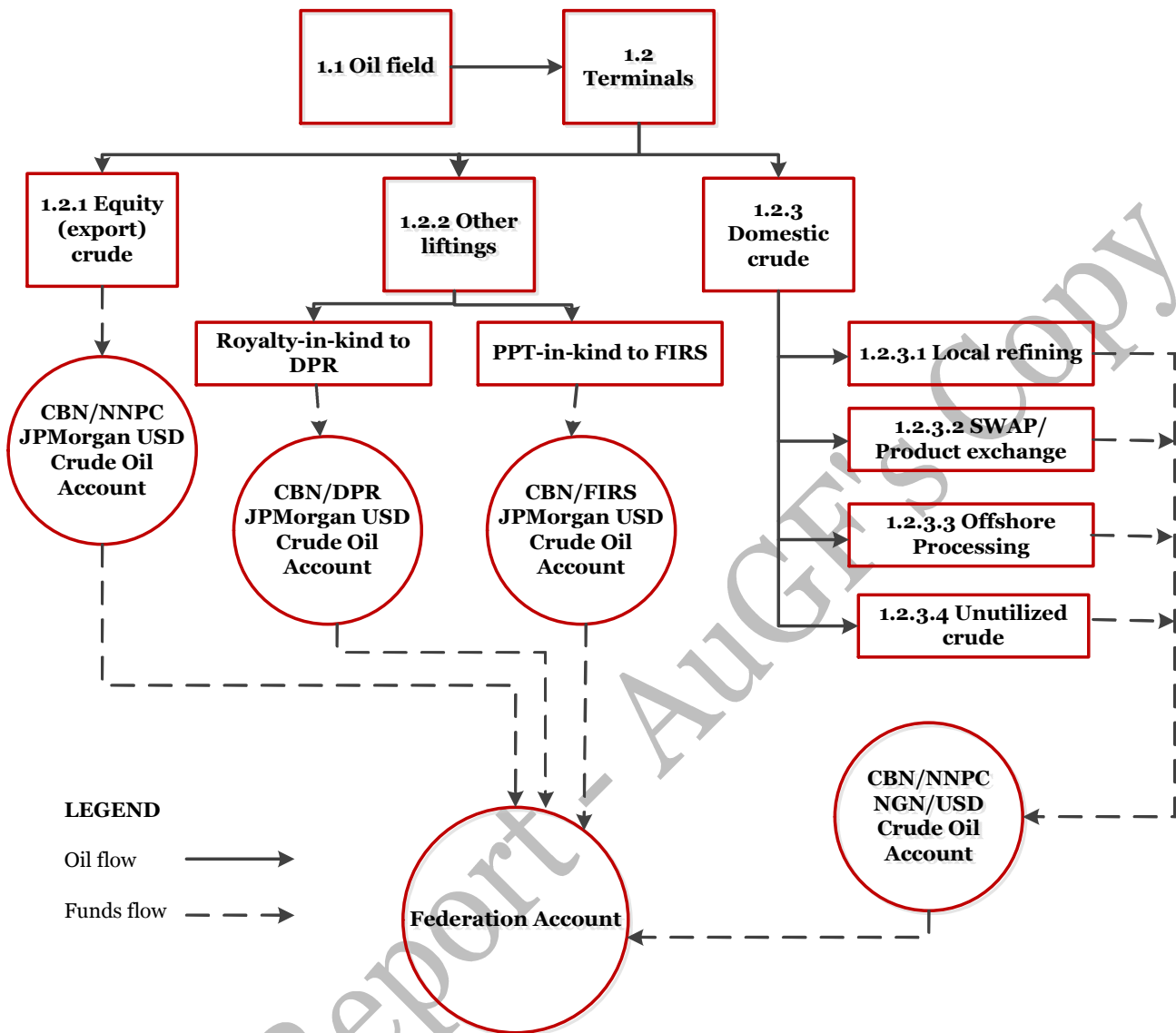
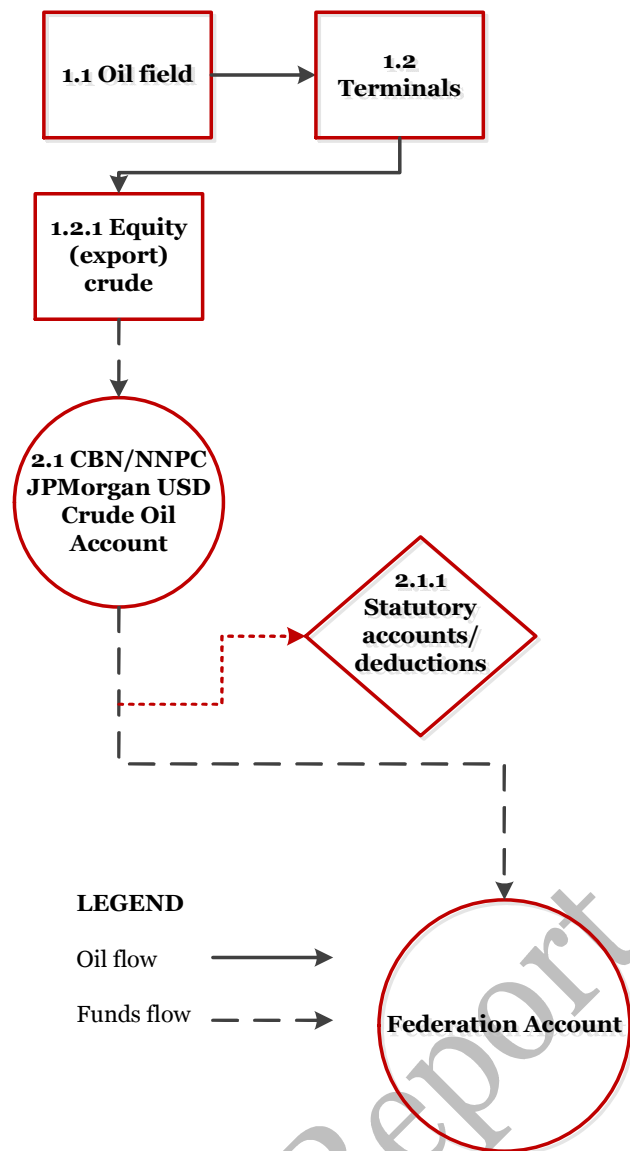


Figure 1.1: Overview of crude oil production and sales flow (Federation’s portion)
 Source: Discussion with COMD

3.3.2. Equity crude oil and revenue flow



1.1 Oil production

- Nigeria produces over 2.5million barrels of crude oil per day
- NNPC in joint partnerships with major licensed Oil Companies operate oil wells for the exploration of Crude Oil
- Unprocessed crude oil is lifted from the Oil wells and distributed to terminals
- There are usually cases of leakages in the pipeline distribution to the terminals due to pipeline vandalism, spillages etc.

1.2 Oil liftings at terminals

- At the terminals, crude oil lifted is allocated to NNPC and other oil producers.
- The Total crude oil lifted can either be exported (Equity) or kept locally for Nigeria’s use (Domestic)

1.2.1 Equity crude

The Federation’s equity interest in crude oil production is lifted as the FGN’s share under Joint Venture (JV) and Production Sharing Contract (PSC) arrangements with other Oil companies.

2.1 Equity crude proceeds

Proceeds from the sale of NNPC liftings of the Federation’s share of total crude liftings are paid into the CBN/NNPC USD account with JP Morgan. Upon NNPC’s periodic instruction to the CBN, proceeds in the JP Morgan account are transferred to the Federation account.

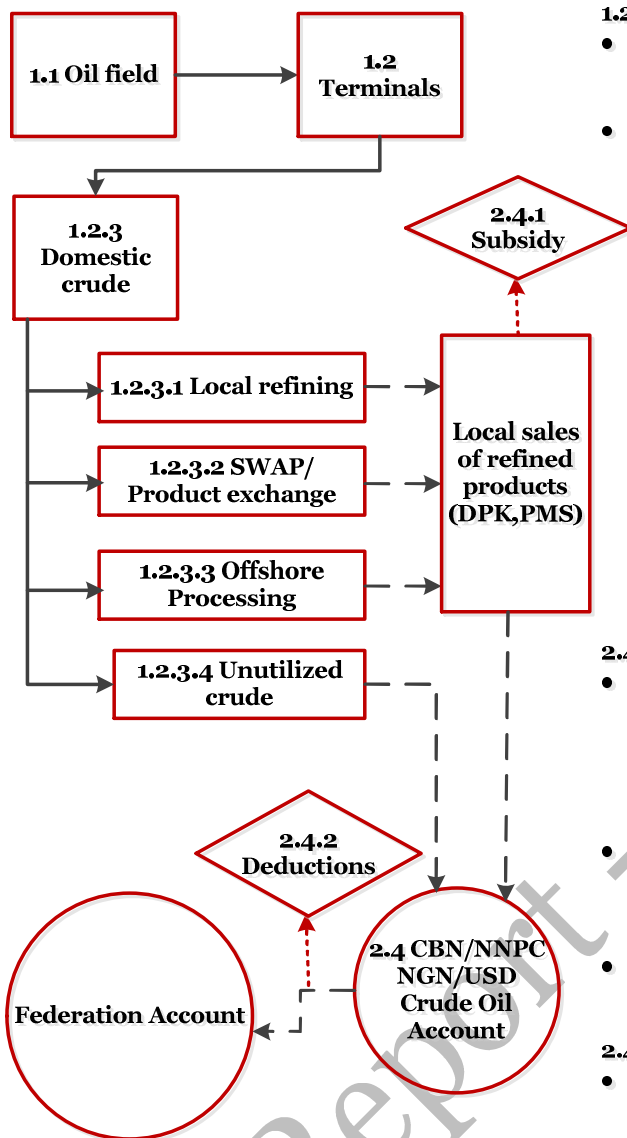
2.1.1 Deductions

Withdrawals are made from the JP Morgan accounts periodically, based on transfer instructions issued by NNPC to CBN

Figure 1.2: Equity crude oil and revenue flow

Source: Discussion with COMD

3.3.3. Domestic crude oil and revenue flow



LEGEND

Oil flow →
Funds flow - - - - -

1.2.3 Domestic crude

- A total of 445,000 barrels of crude oil is allocated to the NNPC daily out of the total crude oil production of the country for the purpose of domestic consumption.
- The NNPC – in addition to what is allocated to refineries – utilizes the crude oil allocation in the following ways:
 - 1.2.3.1 Local Refining Production:** processing of crude oil by the local refineries into refined products. Due to vandalism and leakages, crude oil losses are incurred in the process of transferring crude from the terminals to the refineries
 - 1.2.3.2 Product Exchange (Swaps) arrangement:** exchange of unprocessed crude oil for refined products
 - 1.2.3.3 Offshore Processing Arrangement:** NNPC provides crude oil to parties who would refine on its behalf and return the refined products. NNPC pays the refining and other incidental costs.
 - 1.2.3.4 Outright Sale (of unutilized crude oil):** the portion of the 445,000 barrels per day not utilized either for Swaps, OPAs or local refining is ultimately sold directly by the NNPC

2.4 Domestic crude proceeds

- Proceeds from sale of refined products are paid into NNPC/PPMC NGN accounts with Deposit Money Banks in the case of 1.2.3.1-3. In the case of 1.2.3.4 as well as direct sale of other products like LPFO not needed locally under OPAs, proceeds are paid into NNPC/PPMC USD accounts with Deposit Money Banks
- The amounts in the NNPC/PPMC accounts with Deposit Money Banks are then transferred to NNPC accounts with the CBN upon NNPC’s instruction to the banks. Those amounts are then later moved to the Federation account.
- The amounts to be transferred to the Federation are reduced through the following:

2.4.1 Subsidy claims:

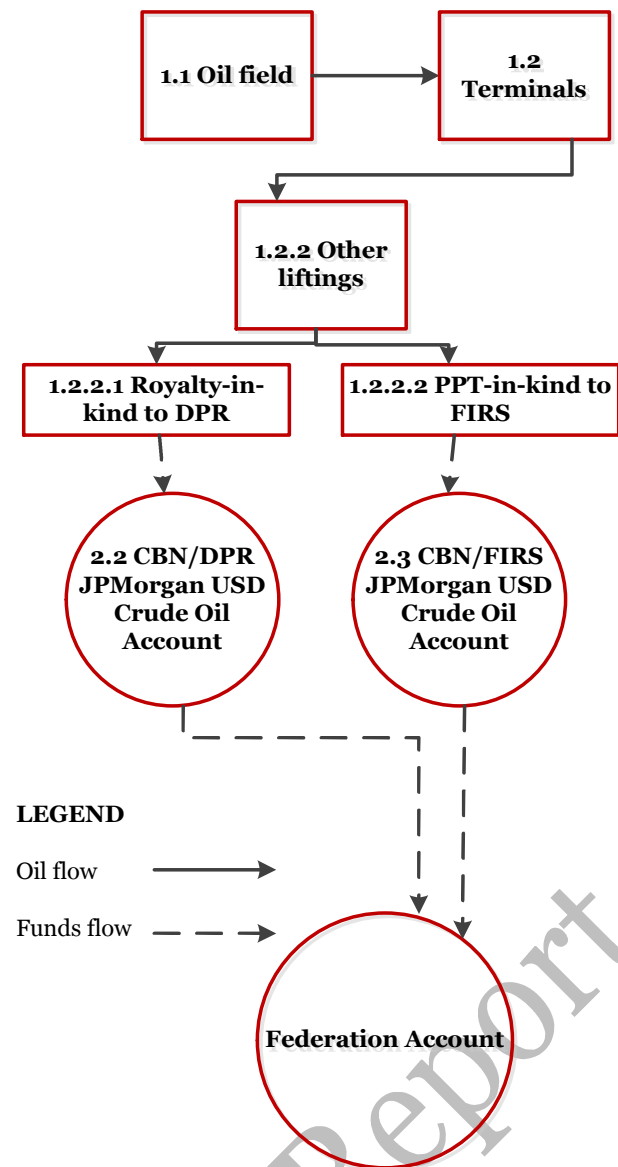
- The Federal Government makes subsidy payments based on the volume of imported products sold in Nigeria, in order to guarantee the availability of petroleum products. Payment is made upon certain conditions and verification of the ownership of vessels by PPPRA. NNPC is expected to pay the Government for its crude from proceeds generated from the sale of derived refined products locally. These refined products are sold at subsidized amounts as instructed by the Government. As such, NNPC remits the proceeds from the subsidized amounts to the Government and not the full amounts due from the crude allocated to it. It can therefore be said that where other marketers have to be paid for subsidy, NNPC’s subsidy entitlement is inherently recovered in the sales process.

2.4.2 Deductions such as:

- **Pipeline maintenance and management costs:** Challenges to the downstream sector, such as frequent pipeline vandalism and refined product theft. The NNPC therefore incurs costs to maintain and operate its pipelines and storage depots
- **Holding cost of strategic reserves:** NNPC incurs demurrage costs to vessel owners for delays encountered while offloading their products

Figure 1.3: Domestic crude oil and revenue flow
Source: Discussion with COMD and PPMC

3.3.4. Other crude oil and revenue flow to the Federation



1.2.2 Liftings by other producers

The Federation’s equity interest in crude oil production also includes what is paid in kind as Royalty and Petroleum Profit Tax by other oil producers operating in the country. Royalties and taxes are also deducted on crude liftings under Modified Carry Arrangements, Other Third Party Financing Arrangements, as well as liftings in favour of NPDC.

1.2.2.1 Royalty-in-kind

Royalties due on the various liftings as explained above are paid in kind. As such, NNPC lifts and sells the crude equivalent on behalf of DPR. Sale proceeds are then paid into **2.3 CBN/DPR USD Account** maintained with JP Morgan

1.2.2.2 PPT-in-kind

Taxes due on the various liftings as explained above are paid in kind. As such, NNPC lifts and sells the crude equivalent on behalf of FIRS. Sale proceeds are then paid into **2.2 CBN/FIRS USD Account** maintained with JP Morgan

These amounts are then transferred from the two accounts to the Federation account.

LEGEND

Oil flow →

Funds flow - - - - -

Figure 1.4: Other crude oil and revenue flow to the Federation
 Source: Discussion with COMD

4. Methodology and Detailed Findings

Final Report - AuGF's Copy

4.1. Total Crude Oil Lifting

4.1.1. Introduction

4.1.1.1. Overview

This review addresses three (3) key areas; outcome of the Senate Committee hearings, the total crude oil liftings by NNPC from all terminals in the period and the total revenue generated from crude oil for the Federation in the period from January 2012 to July 2013.

The Chairman of the Senate Committee, Senator Ahmed Makarfi CON, requested stakeholders associated with the allegation to submit information/documents that would shed more light on the supposed unremitted oil revenue. We reviewed the submissions made by the following stakeholders; Nigerian National Petroleum Corporation (NNPC), Federal Inland Revenue Service (FIRS), Department of Petroleum Resources (DPR), Nigerian Petroleum Development Company (NPDC), Mobil Producing Nigeria Limited (MPN) and Total E&P Nigeria Limited.

As total revenue generated is a function of the total crude oil liftings in the period, we also examined lifting records from various sources to ensure completeness of the lifting volumes as well as the associated revenues.

4.1.1.2. Equity Crude Oil

This refers to the Federation's equity interest in crude oil production sold to approved crude oil traders. This crude oil, which is exported with revenues accruing directly to the FGN, includes crude oil that is lifted as the FGN's share under Joint Venture (JV) and Production Sharing Contract (PSC) arrangements.

Export crude oil sales are handled by the Crude Oil Marketing Division (COMD) of the NNPC. These sales are made to approved Oil and Gas trading and marketing companies at commercial prices benchmarked against international market prices as tracked by Platts¹⁴.

4.1.1.3. Domestic Crude Oil

Domestic volume of crude oil lifted relates to the 445,000 barrels of crude oil allocated to NNPC per day out of the total crude oil production of the country for the purpose of domestic consumption. It is worthy to note that the 445,000 barrels per day was derived from the installed capacity of the four (4) local refineries situated at Port Harcourt (two refineries), Warri and Kaduna.

However, due to the fact that the local refineries operate at levels significantly below the installed capacity, the NNPC in addition to what is allocated to refineries designed ways to ensure there is availability of refined products for sale to local consumers. The various ways include:

1. Product exchange (swap) transactions
2. Offshore Processing Arrangements
3. Allocation to local refineries
4. Outright sale

¹⁴ Dated Brent pricing information as recorded by Platts is used as the benchmark. A spread above (or below) this benchmark known as the Official Selling Price (OSP) is advised by the COMD every month and applied in determining the price to be paid by buyers of crude.

- **Product exchange (swap) transactions:**

These are transactions in which the NNPC contracts to supply the other party with crude oil in return for the other party supplying the NNPC with refined products for sale locally on a value-for-value basis.

- **Offshore Processing Arrangements (OPA)**

Under Offshore Processing Agreements (OPA), the NNPC provides crude oil to another party who would refine the crude oil on behalf of the NNPC and return the refined products to the NNPC based on the yield slate of the party's refinery. The NNPC provides the crude oil and pays the refining and other incidental costs.

The products refined through the OPA are received by PPMC through import jetties, refinery jetties or refinery depots and distributed through pipelines to depots strategically located all over the country from where petroleum tankers lift the products to designated retail outlets.

- **Allocation to local refineries**

This is the portion of Domestic Crude oil allocated to local refineries. The crude oil is pumped from the terminals to the four refineries situated at Warri, Kaduna and two in Port Harcourt.

- **Unutilised domestic crude oil sales**

The domestic crude oil that is not utilized for Swaps, OPAs or local refining is ultimately sold by the NNPC. These sales are made to various trading companies.

4.1.1.4. FIRS

Petroleum Profit Tax (PPT) portion of the Modified Carrying Arrangement (MCA) is payable in kind, that is, the Federal Inland Revenue Service gets crude oil as against payment of cash for Petroleum Profit Tax. Also, some companies involved in Production Sharing Contracts (PSC) pay their PPT in kind.

The payment of PPT in kind was the result of an agreement in place between the NNPC and the FIRS. NNPC, through its Crude Oil Marketing Division (COMD), carries out the liftings on behalf of FIRS and subsequently advises FIRS on the total value and volume of crude oil.

The allocation of crude to FIRS by COMD is done on a monthly basis at a reconciliation meeting involving all parties to the MCAs and PSCs.

4.1.1.5. DPR

The Department of Petroleum Resources, the regulatory agency for the petroleum industry, is responsible for exercising statutory supervision and control of the industry. The department is responsible for collecting payments of rents, royalties and other revenues due to government.

DPR receives royalty payments in kind (crude oil) from IOCs involved in MCAs and PSCs. Lifting of the crude oil is carried out by COMD on behalf of DPR. NNPC subsequently advises DPR of total liftings and value expected. The allocation of crude to DPR by COMD is done on a monthly basis at a reconciliation meeting.

4.1.1.6. Others

In addition to equity and domestic crude, the Federation also receives crude oil revenue from the following sources:

Modified Carry Arrangement (MCA)

MCAs are funding agreements entered into between the NNPC and other oil companies (Joint Venture operators), where the operator/lender funds a portion of NNPC's obligation of the Joint Venture.

Other Third Party Financing arrangements (OTPF)

Due to liquidity challenges, NNPC was funding Exploration and Production (Capex and Opex) using external lenders. In this instance, the NNPC and its Joint Venture (JV) partners form a Special Purpose Vehicle (SPV) which sources funds externally. The SPV repays the lender using crude oil from production.

Nigeria Petroleum Development Company (NPDC)

NPDC is a fully owned NNPC subsidiary. The company has carried out exploration and production operations since 1988 and has also been assigned assets by NNPC following the divestment by some JV partners between 2010 and 2011. NPDC pays the Federation, royalties and taxes on liftings from its oil and gas assets.

4.1.1.7. Senate submissions

The Senate Committee set up to investigate the alleged unremitted crude oil revenue to the Federation Accounts requested submissions from relevant parties including CBN and NNPC. CBN stated in its initial submission that based on the information received from Pre-shipment Inspection Agencies (PIA), the revenue accruing to the Federal Government was a sum of \$65¹⁵ billion.

The Ministry of Finance set up a Reconciliation Committee to align the differing figures that were being reported and a final reconciled revenue figure of \$67 billion was agreed.

S/N	SOURCE	AMOUNT (\$bn)
1	Equity	14
2	Domestic Crude	15
3	FIRS	2
4	DPR	28
5	NPDC	6
6	Third Party Financing	2
TOTAL		67

Table A1 – Summary of crude oil revenue generated for the period of January 2012 to July 2013 as reported by NNPC

4.1.2. Procedures Performed

1. Reviewed Senate submissions from the various stakeholders to determine the agreed revenue from crude oil liftings.
2. Conducted interviews with relevant process owners to confirm our understanding of NNPC's revenue management and reporting processes.
3. Requested information on the volumes and prices of crude oil lifted during the period under review from COMD, DPR and PIAs in order to establish lifting volumes and values.
4. Compared the lifting volumes obtained from COMD and DPR during the period under review and highlighted any variances to ensure accuracy and completeness of data.
5. Reconciled prices of crude oil obtained from COMD with Platts quotations.
6. Reviewed discrepancies and variances by discussing with staff of COMD and PPMC to ensure integrity of the data used for conclusions.
7. Documented findings and conclusions.

¹⁵ CBN submission to the Senate

4.1.3. Limitation

Lifting records provided by DPR could not be separated into the nature of lifting, i.e., either domestic or equity crude.

4.1.4. Key Findings

4.1.4.1. Differences between NNPC, DPR and PIA crude oil lifting records

NNPC Liftings

We obtained lifting records from NNPC, DPR and the PIAs in order to ascertain the total number of liftings for the period under review and obtained the figures below:

Source	Volumes
COMD, NNPC	615,549,722
DPR	600,865,561
PIA ¹⁶	589,096,575

Table A2: Lifting records per NNPC, PIA and DPR

The table above shows that COMD captured more NNPC liftings than DPR and the PIAs, and we have been able to confirm revenues from these COMD liftings to either the JP Morgan accounts or submissions to FAAC. For this reason, we relied on the revenue figures generated from COMD numbers.

However, during the Senate Hearing, the former NPDC MD Mr Victor Briggs disclosed that NPDC lifted 61,027,701 barrels of crude oil for the review period. This is more than the volume recorded by COMD of 50,536,316 barrels of crude oil. Discussions with COMD revealed that not all NPDC liftings are captured by COMD due to the fact that some of the NPDC liftings are lifted by the Strategic Alliance Agreement partners (See further analysis in section 4.5). As a result; we used the volumes and values provided by the MD of NPDC at the Senate hearing in our analysis.

Conclusion

Based on the information analyzed above we have adopted the liftings below for our review:

S/N	NATURE	COMD Volumes (bbls)
1	Equity	128,741,037
2	Domestic Crude	254,738,219
3	FIRS	144,811,144
4	DPR	14,411,415
5	NPDC	61,027,701
6	Third Party Financing	22,311,591
TOTAL		626,041,107

Table A4: Liftings reviewed

¹⁶ Details on Appendix 6.1.32

4.1.4.2. \$3.6 million Under-valuation of crude oil lifting by NNPC

The Methodology of Nigerian Crude Pricing¹⁷ by NNPC is based on a 5-working day structure with respect to the date of bill of lading (B/L) which is the exact date of crude oil lifting.

The price of crude is determined after lifting with respect to Platt's Dated Brent price quotation, being used as the benchmark. The crude is allocated to the buyer at least 45 days prior to the loading date when the buyer is also informed by NNPC of the volume of crude oil, the grade of crude, among others. The NNPC employs three pricing scenarios when selling their crude to customers.

These are:

1. Prompt (Default Option)
2. Advanced
3. Deferred

A buyer is conceptually allowed to elect one of the three pricing scenarios to be applied to his purchase. In the event that a buyer chooses not to elect any of the pricing scenarios, NNPC automatically adopts the default (Prompt) pricing scenario.

Prompt pricing option – refers to the average of the Dated Brent Price for 5 days after the Bill of Lading date.

Advanced pricing option – refers to the average of the Dated Brent Price for 5 days before the bill of lading date.

Deferred pricing option – refers to the average of the Dated Brent price for 6 to 10 days after the Bill of lading date.

Based on the lifting records reviewed, the pricing option chosen by each off-taker and the pricing methodology described above, we computed the Official Selling Prices (OSP) for all the crude oil liftings. We compared our computation with the values reported by COMD and noted differences that resulted in an under-valuation of \$32,909,590 relating to thirteen different liftings¹⁸ (Equity and domestic crude) during the review period.

The following explanations were provided by NNPC for the differences noted:

Differences resulting in value loss to the Federation

- **Under-valuation of \$1,503,540**

Of the \$33 million, COMD agreed that for two liftings¹⁹ (with an under-valuation of \$1,503,540), they had made valuation errors by computing the amounts due using a different pricing option in one case and a wrong Official Selling Price (OSP) in the other.

- **Under reporting to FAAC of \$2,107,275**

For four other liftings²⁰ with differences totaling \$2,107,275, the unit prices on the schedule received did not agree with our recomputation. We checked the liftings to COMD's valuation documents and observed that the prices agree with our recomputation but were just different on

¹⁷ From discussions with Crude Oil Marketing Division of NNPC (COMD)

¹⁸ See Appendix 6.1.2 for details of affected liftings

¹⁹ Liftings 3 and 4 on Appendix 6.1.2

²⁰ Liftings 10 – 13 on Appendix 6.1.2

the schedule provided. However, the different valuations on the schedule were also used in the monthly FAAC reports; as such, the errors resulted in lower remittances to FAAC.

Differences not resulting in value loss to the Federation

- **Differences due to technical charges**

Of the total variance noted, a total sum of \$18,555,899 relates specifically to technical costs on two liftings²¹ with “Zafiro” as the crude type. The allowance for these technical charges was contained in the contract between NNPC and the customers.

- **Differences due to error in schedule provided**

For five other liftings²² with valuation differences totaling \$11,599,531, NNPC claimed that there were errors in the pricing options stated on the schedule provided to us. We reviewed COMD’s valuation for the affected liftings and confirmed that different pricing options were used which agreed to the values on the schedules.

Based on the above explanations, under-valued liftings totaling **\$3,610,815** (shown in Table A5 below) resulted in value loss to the Federation.

Description	Under-valuation \$
Valuation errors agreed by COMD	1,503,540
Under reporting to FAAC	2,107,275
Total unsubstantiated under-valuation	3,610,815

Table A5: Valuation errors resulting in loss to the Federation

The major beneficiaries were Fujairah Refinery - \$805,545, NNPC (KRPC/WRPC) – \$697,995 and NNPC (COMD) - \$2,107,275. Subsequent to our identification of this issue, NNPC has amended the errors, and have reflected the amendments in the remittances to FAAC in October 2014.

4.1.4.3. \$2.34 billion under reported revenue to Senate Committee

The total revenue generated from our analysis from all revenue streams amounted to \$69.34 billion as shown on Table A8 below). We discovered a difference of \$2.34 billion between the amount reported by NNPC to the Senate Committee and our analysis. This was as a result of the following;

FIRS

Information received from both COMD and FIRS revealed that the total revenue generated by FIRS amounted to \$16 billion which is \$1 billion higher than the amount reported to the Senate.

NPDC

Information provided by NPDC to the Senate stated total revenue generated from liftings of \$6.82 billion. This amount is \$0.82 billion higher than the amount quoted by the Reconciliation Committee.

²¹ Liftings 1 and 2 on Appendix 6.1.2

²² Liftings 5 – 9 on Appendix 6.1.2

Third Party Financing

Information received by COMD and confirmed by the third parties Mobil and Total revealed total revenue figures of \$2.43 billion. This is \$0.43 billion higher than the amount reported to the Senate by NNPC.

Equity, Domestic and DPR

Our analysis also revealed increased revenue of \$0.29 billion and \$0.22 billion respectively from Equity and Domestic streams and a reduction of \$0.4 billion from DPR revenue when compared to the amount reported to the Senate.

NATURE	NNPC SUBMISSION \$	VERIFIED \$	VARIANCE \$
Equity crude	14.00	14.29	0.29
Domestic sales	28.00	28.22	0.22
FIRS	15.00	16.00	1.00
DPR	2.00	1.58	(0.42)
NPDC	6.00	6.82	0.82
Third party financing	2.00	2.43	0.43
TOTAL	67.00	69.34	2.34

Table A6 – Difference between submission to Senate Committee and PwC conclusion

Conclusion

Total revenue valuation

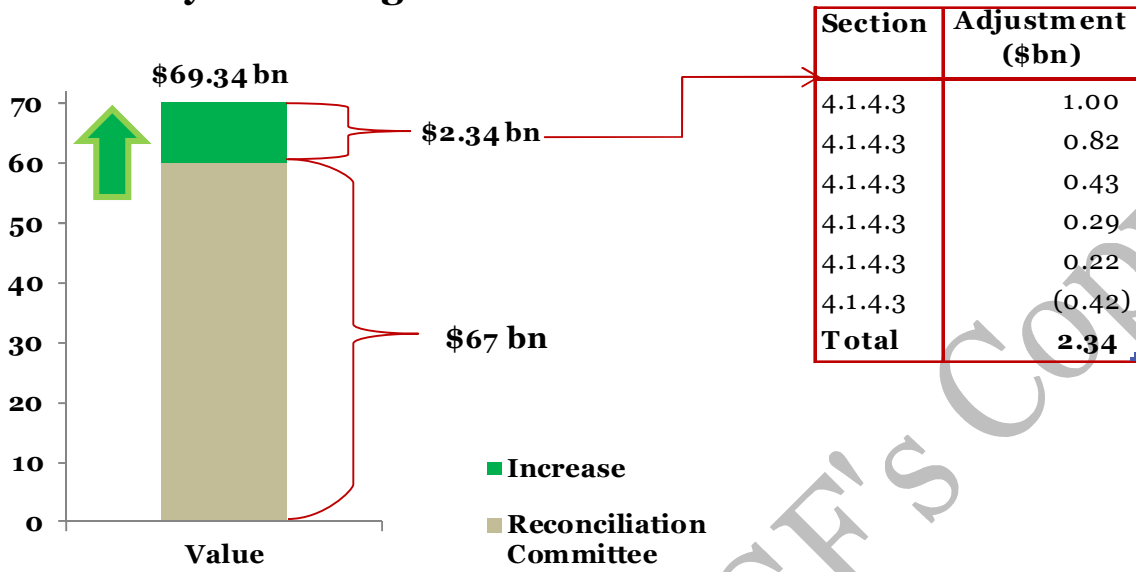
Our conclusion on total revenue generated for the Federation in the period from January 2012 to July 2013 is detailed below;

S/N	NATURE	Volumes (bls)	Values (\$)
1	Equity	128,741,037	14,293,713,820
2	Domestic Crude	254,738,219	28,215,731,691
3	FIRS	144,811,144	16,004,971,181
4	DPR	14,411,415	1,578,108,269
5	NPDC	61,027,701	6,815,188,626
6	Third Party Financing	22,311,591	2,430,339,330
	TOTAL	626,041,107	69,338,052,916

Table A8– Total revenue generated in the period under review, PwC conclusion

4.1.5. Summary of findings

Summary of findings



4.1.6. Other findings

4.1.6.1. Data collation and single point accountability

The data gathered by the various Agencies and sub-units are kept within the custody of the respective Agencies/SBUs. There is no single reliable data repository that can provide a holistic overview of the crude oil sales process from end to end. As such, variances in the records which would flag issues may be missed. Also, the opportunity to take informed decisions based on robust underlying data is limited.

We observed that the same data obtained from different sources contained discrepancies which had not been reconciled as at the time of this review. An example would be the details of all crude oil cargoes lifted; information from the DPR, Pre-shipment Inspection Agencies and the NNPC COMD had not been reconciled as at the time of review.

More so, the various Agencies and sub-units administering the crude oil sales process work in silos and there is no single point accountability. This is characterized by record duplications, reconciling items, opacity regarding the activities of certain Agencies/SBUs and inefficiencies.

Reconciliation was particularly challenging as we needed an independent source to verify the lifting records provided by COMD. The data obtained from DPR and the PIAs were incomplete, duplicated or difficult to interpret.

The reports generated by the Agencies/SBUs have different formats and classifications which creates difficulties in comparison of similar data sets from different Agencies/SBUs. For example, the export data as captured by the PIAs and DPR does not break down the crude oil exports per category like Tax Oil, Royalty oil, Export crude etc.

4.1.6.2. NNPC business model

The current NNPC business model in relation to the usage of the domestic crude is inadequate as can be seen from the foregoing. The business model that informed the creation of NNPC is a subsidy minded model. This model is responsible for several of the weaknesses and lapses that have already been outlined and the net effect is an erosion of value to the Federation.

Furthermore, the accounting and reconciliation system for crude oil revenues used by all Government agencies appears to be inaccurate and weak. We noted significant discrepancies in data from different sources. The lack of independent audit and reconciliation led to over reliance on data produced from NNPC which may not necessarily be accurate. This matter is further compounded by the lack of independence within NNPC as the business has conflicting interests of being a stand-alone self-funding entity and also the main source of revenue to the Federation account.

4.2. Revenue Remitted

4.2.1. Introduction

4.2.1.1 Overview

It was established from NNPC's submission to the Senate that a total of \$67 billion revenue had been generated for the Federation during the period January 2012 to July 2013, out of which only \$47 billion had been remitted, consisting;

1. \$14 billion from equity crude sales
2. \$15 billion PPT from FIRS
3. \$2 billion Royalty from DPR
4. \$16 billion from domestic crude sales

This review verified the remittances listed above and identified any other remittances that might have been made to the Federation Account during the period under review.

Proceeds from crude oil sales are received in various forms depending on the source of the revenue and the type of arrangement that created the revenue. The various revenue sources and how proceeds are received by the Federal Government have been summarized below:

4.2.1.2 Equity Crude Oil

The purchaser of the crude oil cargo opens a 30-day Letter of Credit (LC) in favor of the NNPC. Payments for the crude oil are credited to the NNPC/CBN JP Morgan Chase Crude Oil and Gas US Dollar (USD) account on expiry of the 30 day period.

The CBN maintains the NNPC/CBN Oil and Gas US dollar accounts with JP Morgan Chase on behalf of the NNPC and both parties monitor the accounts for payments as a LIBOR based interest penalty applies to late payments.

4.2.1.3 Domestic Crude Oil

• Product exchange (swap) transactions

SWAP transactions involve sale of crude oil, by NNPC, in exchange for refined petroleum products on a value-for-value basis. The proceeds from the sale of refined products are paid by buyers into NNPC local Deposit Money Bank (DMB) accounts as designated by PPMC. The DMBs periodically remit these funds into the CBN/NNPC crude oil revenue (Naira) account based on NNPC's instruction. NNPC subsequently issues a remittance advice to CBN informing them of the transfer from the DMBs to CBN's remittance pool account and then another remittance advice to move the funds to the Federation Account. The inflows through sale of products from the SWAP transactions are in Naira.

• Offshore Processing Arrangements (OPA)

OPAs involve the use of a refinery outside Nigeria to process crude oil into refined products. The refinery is paid refining fees. Proceeds of subsequent sale by NNPC of the refined products are deposited in the NNPC local Deposit Money Bank accounts. NNPC issues an instruction to the Deposit Money Bank to move the funds into the CBN remittance account. The CBN remittance account is further debited by the CBN through a remittance advice from NNPC into the Federation Account.

• Allocation to Local refineries

The proceeds from sale of the refined products are likewise deposited in the CBN remittance accounts by the Deposit Money Banks through a remittance advice from the NNPC. The CBN also through a remittance advice from the NNPC credits the inflow back to the Federation Account.

• Unutilised Domestic Crude Oil Sales

Proceeds from sale of unutilized crude sales are paid into designated USD accounts with DMBs.

Note – All the proceeds from domestic crude liftings are subject to a 90 day credit period which means that revenue from liftings in a particular period are remitted three (3) months after the lifting.

4.2.1.4 FIRS

This goes through the same process as equity crude oil. However remittance is made directly to the FIRS JP Morgan account. FIRS then issues remittance advice to CBN, instructing the Bank to remit the proceeds in the JP Morgan account into the Federation Account.

4.2.1.5 DPR

This goes through the same process as equity crude oil. However, remittance is made directly to the DPR JP Morgan account. DPR then issues remittance advice to CBN, instructing the Bank to remit the proceeds in the JP Morgan account into the Federation Account.

4.2.1.6 Senate submissions

The Senate Committee set up to investigate the alleged unremitted crude oil revenue for the Federation requested for submissions from relevant parties including CBN and NNPC. In addition, the Ministry of Finance set up a Reconciliation Committee (consisting of CBN, NNPC, DPR, FIRS, OAGF, the Budget Office of the Federation, Federal Ministry of Finance and Federal Ministry of Petroleum Resources) to align the differing figures that were being reported and a final reconciled remittance figure of \$47 billion was agreed.

S/N	NATURE	Total Revenue (\$bn)
1	Equity	14
2	Domestic Crude	16
3	FIRS	15
4	DPR	2
TOTAL		47

Table B1 – Summary of crude oil revenue remitted for the period of January 2012 to July 2013 as reported by NNPC

4.2.2. Procedures Performed

1. Conducted interviews with relevant process owners to validate understanding of each agency's remittance procedures.
2. Traced equity remittances to CBN/NNPC JP Morgan account to confirm the total amount received from equity crude sales.
3. Traced domestic remittances to various DMB accounts to confirm the total amount received from domestic crude sales.
4. Traced FIRS remittances to CBN/FIRS JP Morgan accounts to confirm total amount received in respect of PPT
5. Traced DPR remittances to CBN/DPR JP Morgan accounts to confirm total amount received in respect of Royalties
6. Compared amounts in procedures '2', '3', '4' and '5' above to FAAC reports to establish completeness of remittances to the Federation.
7. Examined remittance advice issued by NNPC to CBN to transfer payments to the Federation Account to enable comparison with FAAC reports.
8. Documented findings and conclusions

4.2.3. Limitations

1. Up till the time of writing this report, our request for bank statements from CBN was not responded to.
2. Due to the limitation identified above, we relied on the account statements obtained from other stakeholders to carry out our independent check on the remittances made.

4.2.4. Key Findings

4.2.4.1. Under-reported revenue remittance figure of \$2.33bn

The total revenue remitted from our analysis from all revenue streams amounted to \$49.33 billion. We discovered a difference of \$2.33 billion between the amount reported by NNPC to the Senate Committee and our analysis. This was as a result of the following;

4.2.4.1.1. Domestic remittance

The monthly remittances relating to domestic sales which we traced to the Federation Account added up to \$14.5 billion²³. This is \$1.5 billion lower than the amount reported to the Senate by NNPC. Our investigation revealed that NNPC added the receipts from domestic crude sales to the Federation from January 2012 to July 2013. This is however incorrect because receipts for domestic crude sales are usually remitted 90 days after the sales/lifting which means that receipts for the period under review were remitted from April 2012 up till October 2013. This is the reason for the \$1.5 billion difference.

4.2.4.1.2. FIRS remittance

We established that the total revenue generated from FIRS was \$16 billion which is \$1 billion higher than the amount reported to the Senate of \$15 billion. The additional \$1 billion was also remitted bringing the total remittance from FIRS to \$16 billion²⁴.

4.2.4.1.3. Other remittances

We identified revenue from sources that were not previously reported to the Senate including \$1.7²⁵ billion receipt from NPDC and \$1.4 billion²⁶ receipt from third party financing arrangements. The Third Party Financing arrangement with Total E&P Nigeria Limited (TEPNG) resulted in Federation getting a share of \$211,421,677.33 from the USAN Field TMP project which represents Royalty (\$193,478,061.15) and Profit oil (\$17,943,616.18).

Mobil Producing Nigeria Limited (MPN), in its submission to the Senate, stated that the value of crude oil lifted from the third party financing arrangement with NNPC amounted to \$1,376,820,327.36. The amount is made up of lifting from the Reserve Development Project (\$858,750,973.04) and the Satellite Field Development Project (\$518,069,354.32). We confirmed the sum of \$300 million was paid by MPN to the NNPC/CBN JP Morgan Account from the Satellite Field Development project out of the total sum of \$518 million while the total \$858 million from the Reserve Development Project was received in the same account. See detailed work done in the section titled 'Other Third Party Financing' section 4.3.

²³ See Appendix 6.1.4 – Domestic remittance

²⁴ See Appendix 6.1.5 – FIRS remittance

²⁵ See Appendix 6.1.6-7 – NPDC remittance

²⁶ See Appendix 6.1.8-9 – Third party financing remittance

4.2.4.1.4. NPDC remittance

The proceeds due to NNPC and hence the Federal Government from total NPDC revenues include royalties and PPT. NPDC stated in its submission that a total of \$2,175,635,436 was due to the Federal government, PPT being \$1,147,552,371 and Royalties being \$1,028,083,065; out of which a total sum of \$1,701,991,619 had been paid to both FIRS and DPR. See detailed work in the section titled 'NPDC' section 4.5.

4.2.4.1.5. Equity and DPR remittance

The revenue remitted from equity crude proceeds was \$14.16 billion²⁷; which was \$0.2 billion higher than the figure reported to the Senate Committee. Also, a total of \$1.56 billion²⁸ was traced to the CBN/DPR account; which was \$0.4 billion lower than the figure reported to the Senate Committee. These changes were in line with the changes identified from the total revenue generated from each area.

Total revenue remitted

NATURE	Expected per NNPC	Remitted per Analysis	Variance
	\$'Billion	\$'Billion	\$'Billion
Equity crude	14.0	14.16	0.16
Domestic sales	16.0	14.54	(1.46)
FIRS	15.0	16.0	1.0
DPR	2.0	1.56	(0.44)
NPDC	-	1.7	1.7
Third Party Financing	-	1.37	1.37
TOTAL	47	49.33	2.33

Table B2– Comparison of total revenue with expected and reported remittances

Source – PwC analysis

4.2.4.2. Amounts not remitted to the Federation

4.2.4.2.1. Equity revenue due but not remitted

We noted a variance between the total equity revenue expected to be remitted and the actual remittances received in the JP Morgan account. A difference of \$130 million²⁹ was discovered.

SOURCE	Volumes (bbls)	Values (\$)
COMD	128,741,037	14,293,600,200
PwC	128,741,037	14,162,976,470
Difference	-	130,623,730

Table B3 – Difference in equity revenue generated and remitted

This variance was as a result of various issues noted including; use of credit notes, initial funding deposits, technical costs, debt servicing and bank charges. All variances were investigated and confirmed to supporting documentation. See breakdown of costs below

²⁷ See Appendix 6.1.10 – Equity remittance

²⁸ See Appendix 6.1.11 – DPR remittance

²⁹ See Appendix 6.1.12 – Details of unremitted equity revenue

S/N	Source	Amount \$
1	Credit note	11,388,184
2	Initial funding deposit	112,222,988
3	Technical cost	9,011,894
4	Debt servicing	(1,999,975)
5	Bank charges	639
Total		130,623,730

Table B4 – Summary of variances in equity

Source: COMD profile and JP Morgan statement

We made enquiries from NNPC on the nature and use of these identified cost and the following explanations were given.

4.2.4.2.2. Credit notes

NNPC sometimes gives credit notes to its customers who at one time or the other incurred demurrage or cargo losses upon lifting of equity crude. To compensate them for such expenses, the customers get credit notes. Such credit notes could be utilized by the customers at any time in the future upon liftings made.

In utilizing the credit notes, the customers make remittances for subsequent liftings to the JP Morgan account less the value of the credit. We obtained the credit notes for the applicable transactions during the period and no exception was identified.

4.2.4.2.3. Initial funding deposit

Initial deposits are sometimes required to be made by customers before the actual liftings are carried out. This has the effect of reducing the amount eventually remitted by the customers as the value of the lifting is reduced by the amount of initial deposit made.

We verified these deposits by confirming from the JP Morgan statements that the amount had been remitted in the months prior to the customer lifting. No exceptions were noted.

4.2.4.2.4. Technical costs

Technical cost, one of the items identified to have given rise to variances between amount remitted and amount due to have been remitted into the JP Morgan account, is made up of Unit development fee, Opex fee, Abandonment Tariff and Shared Facilities Tariff.

These technical costs relate specifically to liftings with “Zafiro” as the crude type. On examination of the Utilization and Unit Operating Agreement, we noted that the technical cost to be applied on the total quantity of crude oil lifted per day for the period under review was \$9.515. We performed a check to ascertain the reasonability of the technical charge and obtained contract agreement that relates to the charge and we noted no exceptions.

4.2.4.2.5. Debt servicing

Debt servicing, another source of variance identified, relates to the amount owed by Duke Oil to NNPC from debt servicing arrangement with Pan Ocean. The debt was repaid by Duke Oil in addition to the value of the lifting which resulted in the receipt of a higher amount than what was expected to be paid to the Federal Government. We verified this arrangement by examining the invoice and payment instruction between NNPC and Duke Oil. The total debt being repaid by Duke Oil was \$2 million.

4.2.4.2.6. Bank charges

Charges deducted by the bank for certain transactions were identified as one of the reasons for the variances between amount due and amount traced to the JP Morgan statement. We traced the charges to the JP Morgan bank statement for the period under review.

4.2.4.3. Domestic revenue not remitted to the Federation

The total amount remitted from sale of domestic crude amounted to \$14.5 billion from our analysis. This is about half of the total revenue generated from domestic crude sales and \$1.5 billion lower than the amount claimed by NNPC as shown in the table below;

SOURCE	Values (\$)
Total Revenue	28,215,731,691
Total remitted	14,542,654,329
Difference	13,673,077,362

Table B5– Difference between total domestic revenue generated and remittance

Source – PwC analysis, CBN bank statements

4.2.4.3.1. About \$800,000 not remitted due to wrong unit prices quoted on FAAC reports

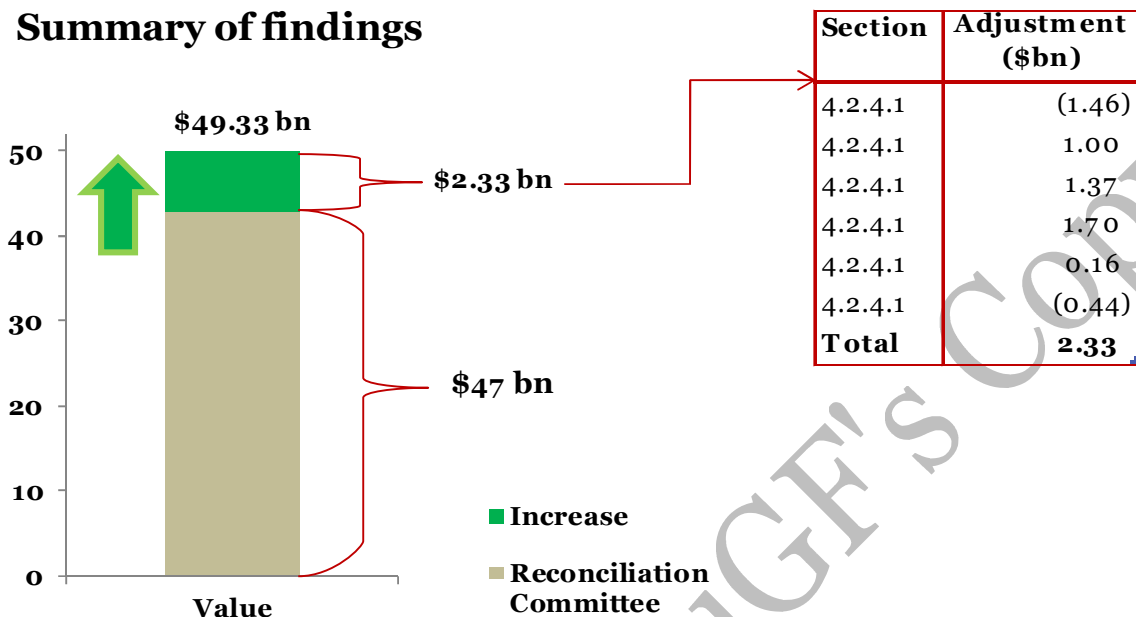
As explained in Section 4.1.4.2, while carrying out a recomputation of crude oil revenue generated during the review period, we observed four domestic liftings³⁰ with differences totaling \$1,250,619 between the unit prices on the schedule received (which were reported to FAAC) from COMD and our recomputation. However, our investigation revealed that for one³¹ of the liftings (amounting to \$430 million), the amount reported to FAAC by NNPC was correct. The variance between our computation of the commercial value of the above lifting and that performed by COMD (NNPC) was due to the source information used for the computation³². For the remaining three liftings, COMD confirmed that a wrong provisional unit price was used to remit to FAAC. Subsequent to our identification of the issue, NNPC has corrected the errors in the October 2014 FAAC report.

³⁰ See liftings 10 – 13 on Appendix 6.1.2

³¹ Lifting 13 on Appendix 6.1.2

³² Please see Double Valuation issue discussed further in 4.2.6.1

4.2.5. Summary of findings



4.2.6. Other findings

4.2.6.1. Double valuations for crude sales under Unutilized Crude and Product Exchange

We noticed from our review of the bank accounts where unutilized crude receipts are paid into, that amounts received from customers were usually more than the valuation reported to FAAC. Our investigation revealed a practice whereby crude oil lifted was valued at a lower price in the FAAC report than the price paid by the off taker.

In these cases, after the buyer elects a pricing option under which the purchase will be made, NNPC prepares a separate valuation of the lowest under the three pricing option. NNPC would then report the sale to FAAC using the lowest price valuation while invoicing the off-taker a higher price. We requested for a schedule and valuation documents invoiced to buyers under unutilized crude and Product Exchange contracts during the review period, in order to fully quantify the impact of this practice on the Federation Account. Our request was not granted.

4.2.7. Information provided subsequent to 28 November 2014.

After the submission of our initial report to the Auditor-General of the Federation on 28 November 2014, the following was brought to our attention by NNPC regarding our findings on Revenue Remittance:

- Unremitted DPR revenue: NNPC notified DPR of our finding (in Section 4.2.4.4) that the payments for four DPR liftings did not reflect into the CBN/DPR JP Morgan account. We then received confirmation from DPR evidencing that the payments were made by NNPC. We

traced the payments to CBN/DPR JP Morgan account bank statements and confirmed the inflows were made in the months following the due dates.

- Unremitted Domestic crude revenue: Following our finding in Section 4.2.4.3 that domestic crude revenues remitted to the Federation was short by \$1.5billion, NNPC provided us post-FAAC reports confirming that the outstanding amounts were remitted in months after they were due. The table below summarizes the new position:

Domestic crude sales remittances to the Federation account

Lifting Month	Payment month	Unpaid amount per initial analysis (\$)	Latest evidence provided
May 2012	August, 2012	924,818,360	FAAC report for January 2013 stating that an extra sum of N143bn was paid to the Federation in September 2012 in between the August and September FAAC meetings. The naira amount is equivalent to \$924million using a rate of N154.70/\$
September 2012	December, 2012	38,764,696	FAAC report for January 2013 stating that the sum of N6bn relating to December 2012 proceeds was accounted for. The naira amount is equivalent to \$38.7million using a rate of N154.78/\$
May 2013	August, 2013	484,652,666	FAAC report for November 2013 stating that an extra sum of N75bn was paid to the Federation in September in between the August and September FAAC meetings. The naira amount is equivalent to \$485million using a rate of N154.75/\$
Total	Total	1,448,235,721	

The effect of the two pieces of information above on our overall summary on revenue remitted based on proceeds of crude oil lifted between January 2012 and July 2013 is therefore as follows:

	\$billion
Cash received on initial report	49.33
DPR revenue now remitted	0.03
Domestic crude revenue now remitted	1.45
	50.81

4.3. Other Third Party Financing

4.3.1. Introduction

Out of the alleged unremitted oil revenue of \$20billion, NNPC accounted for \$2billion as amounts generated under Other Third Party Financing Arrangements with two (2) International oil companies; Mobil Producing Nigeria (“MPN”) and Total Exploration and Production Nigeria (“TEPNG”)³³.

Both oil companies made submissions at the Senate Public Hearing on the nature and status of their financing arrangements with NNPC.

Our review of the oil companies’ submissions revealed that Mobil Producing Nigeria participated in a Joint Venture with NNPC on two projects, Reserves Development Project (RDP) and Satellite Field Development Project (SFDP), while TEPNG participated in the production of USAN crude oil stream.

Their submissions further showed that NNPC’s lifting revenues for the third party financing arrangements with MPN and TEPNG were \$1,376,820,326 and \$1,053,519,002 respectively³⁴, totaling \$2,430,339,328.00, as shown in Table C1 below.

Joint Venture Partners	Projects	NNPC’s Revenue (\$)
NNPC/MPN	Reserves Development Project (RDP)	518,069,354
NNPC/MPN	Satellite Field Development Project (SFDP)	858,750,973
NNPC/TEPNG	USAN Crude Oil stream	1,053,519,002
TOTAL		2,430,339,328

Table C1 – Submissions at the Senate hearing by Total and Mobil

Modalities of the Projects

Due to liquidity challenges, NNPC was funding Exploration and Production (Capex and Opex) using external lenders. In this instance, the NNPC and its Joint Venture (JV) partners form a Special Purpose Vehicle (SPV) which sources funds externally. The SPV repays the lender using crude oil from production.

NNPC operated two projects with Mobil Producing Nigeria; RDP and SFDP, and had a 60 percent share, with the remaining 40 percent for MPN.

The Reserves Development Project (RDP) was set up for the construction and drilling of 27 oil wells in 10 Joint Venture assets, inclusive of three work-overs within three OMLs operated under the JV. The total cost of the RDP was \$1.5billion which was sourced as loans from both Nigerian and international commercial banks. Each JV partner lifts separately with proceeds from crude oil sales deposited into an offshore Escrow Account.

The Satellite Field Development project (SFDP) is a Joint Venture project set up to fund and develop up to 22 undeveloped oil and gas fields and restore production to two developed non-producing fields in Nigeria. The Project was set up in phases with Phase 1 comprising the restoration of two shut-in

³³ Senate Committee Submissions

³⁴ MPN and TEPNG ‘s Submission during the Senate Hearing

fields (Isobo and Asabo, “Primer Projects”) and the development of three Satellite Oil Fields (Abang, Oyot, Itut, “AOI Satellites”) and Phase II, a roll-over of Phase I. The loan size of the project (phase I) was \$600million with NNPC and MPN’s exposure at 60% and 40% respectively.

TEPNG Nigeria participated in the production of Usan crude oil stream which commenced on February 24, 2012. Their agreement was a Production Sharing Contract (“PSC”) in respect of Oil Mining Lease (“OML 138”) where the financing arrangements were to be provided by JV Operators/ Contractor Group. The Contractor Group includes Chevron Petroleum, Esso Exploration and Production Nigeria (Offshore East) Limited (“Esso”), Nexen Petroleum Nigeria Limited and TEPNG.

The revenues from liftings are paid into an Escrow account and subsequently shared between the Contractor Group and NNPC after royalties, tax and operating cost deductions have been made.

4.3.2. Procedures Performed

The procedures performed were:

- i. Reviewed the submissions of MPN, TEPNG and the Accountant General of the Federation to the Senate to understand their respective claims and roles relating to the unremitted crude oil revenue.
- ii. Requested information from MPN and Total to understand the modalities of the arrangement with NNPC.
- iii. Obtained schedules of the volumes and value of crude oil liftings for the third party arrangements from relevant agencies; Department of Petroleum Resources (DPR), Crude Oil Marketing Division (COMD) and Pre-shipment Inspection Agencies (PIAs).
- iv. Reviewed the records obtained from the various agencies in iii above, to highlight any variances.
- v. Compared findings from “iii” and “iv” above to lifting records provided by the International Oil Companies.
- vi. Requested contract documents between NNPC and other oil companies on the third party financing arrangements to gain understanding of the binding contract.
- vii. Obtained and reviewed the statement of accounts for JP Morgan’s CBN/NNPC Crude Oil and Gas Revenue Account to confirm remittance of the proceeds to the Federation.
- viii. Reviewed extracts of the CBN Royalty account to confirm remittance of Royalty to the Federation.

4.3.3. Limitations

We relied on the submissions made by Mobil and Total at the Senate hearing, as we were granted limited access to both IOC’s during our review.

4.3.4. Key Findings

4.3.4.1. Under-reported third party revenue of \$0.43 billion

MPN, in its submission to the Senate, reported revenue figures of \$518,069,354³⁵ and \$858,750,973³⁶ in respect of the Reserve Development and Satellite Field projects engaged in with NNPC. This amounted to a total revenue of \$1,376,820,327.00. TEPNG on the other hand, reported a revenue figure of \$1,053,519,002³⁷ in respect of the Usan project engaged in with NNPC. This revenue represents royalty and profit oil due to the Federation from these third party financing arrangements.

The total revenue generated from third party financing was therefore \$2,430,339,330, a figure which is \$430,339,330 higher than the \$2 billion reported by NNPC at the Senate Committee hearings.

Source	Volumes (bbls)	Values (\$)
Mobil Producing	12,360,117	1,376,820,327
TEPNG	9,951,474	1,053,519,002
Total	22,311,591	2,430,339,330

Table c2– Total revenue generated from third party financing
Source – Mobil and Total submission to the Senate

4.3.4.2. Undisclosed third party financing remittance to the Federation of \$1.3 billion

Out of the total revenue of \$1.37 billion reported by MPN, \$1.158 billion³⁸ had been remitted to the Federation Account as at November 2013. This was confirmed by the Office of the Accountant General of the Federation³⁹. The total of \$858,750,973 relating to SFDP had been remitted while \$300,000,000 out of the \$518,069,354 relating to RDP had been remitted. The balance of \$218,069,354.32 relates to the amount held back to service the financing cost. Balance after servicing the financing cost is to be distributed to the federation account as soon as the condition precedent is met.

We independently confirmed the payment of the sum of \$300 million into JP Morgan's CBN/NNPC Crude Oil and Gas Revenue Account on 15 November 2013 while the payment of the \$858,750,973 was paid in seven (7) tranches into the same account.

In respect of the USAN project handled by TEPNG, the sum of \$193,478,061 and \$17,943,616 totaling \$211,421,677⁴⁰, being Royalty and Profit Oil was remitted to the JP Morgan accounts.

³⁵ See Appendix 6.1.13 – RDP valuation

³⁶ See Appendix 6.1.14 – SFDP valuation

³⁷ See Appendix 6.1.15 – Usan valuation

³⁸ See Appendix 6.1.9 – Mobil remittance

³⁹ Source: Accountant General of the Federation's submission to Senate Hearing and response to PwC's letter

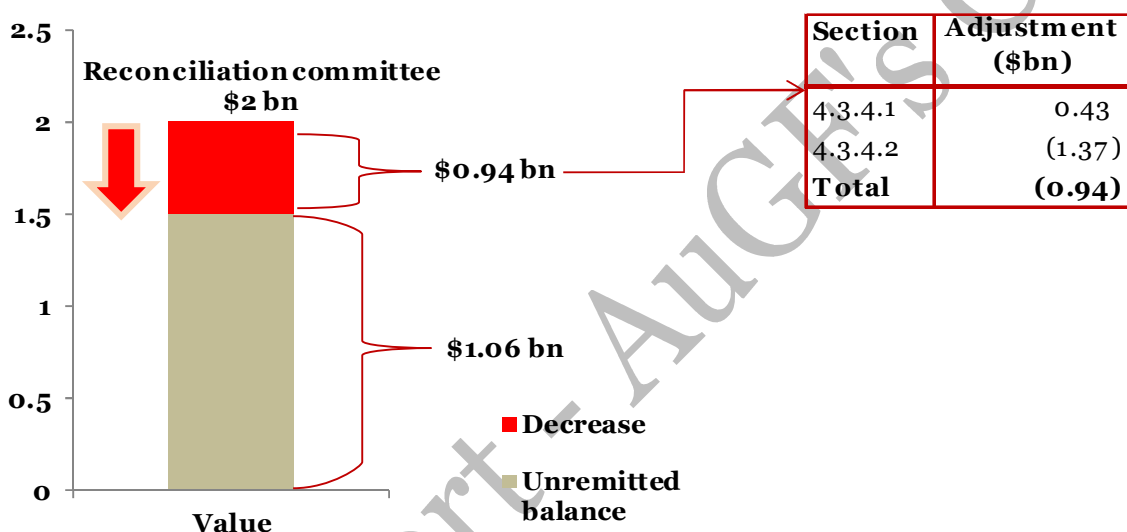
⁴⁰ See Appendix 6.1.8 – TEPNG remittance

Project	Revenue from NNPC's liftings (\$)	Amount Remitted to the Federation Account (\$)	Amount held by SPV to meet contract terms
RDP	518,069,354	300,000,000	218,069,354
SFDP	858,750,973	858,750,973	-
USAN	1,053,519,002	211,421,677	842,097,325
Total	2,430,339,329	1,370,172,650	1,060,166,679

Table C3-Summary of Payments of Other Third Parties

4.3.5. Summary of findings

Summary of findings



The reported crude oil liftings submitted by the oil companies for the Reserve Development Project (MPN's Project) and Usan Development Project (TEPNG's Project) agreed with the records obtained from other alternative sources. We used COMD's records as the main source of information for comparison as COMD had the highest volumes amongst the alternative information sources. The volumes per COMD also agreed to the submissions of the IOCs at the Senate Hearing.

4.4. PMS & DPK Subsidy

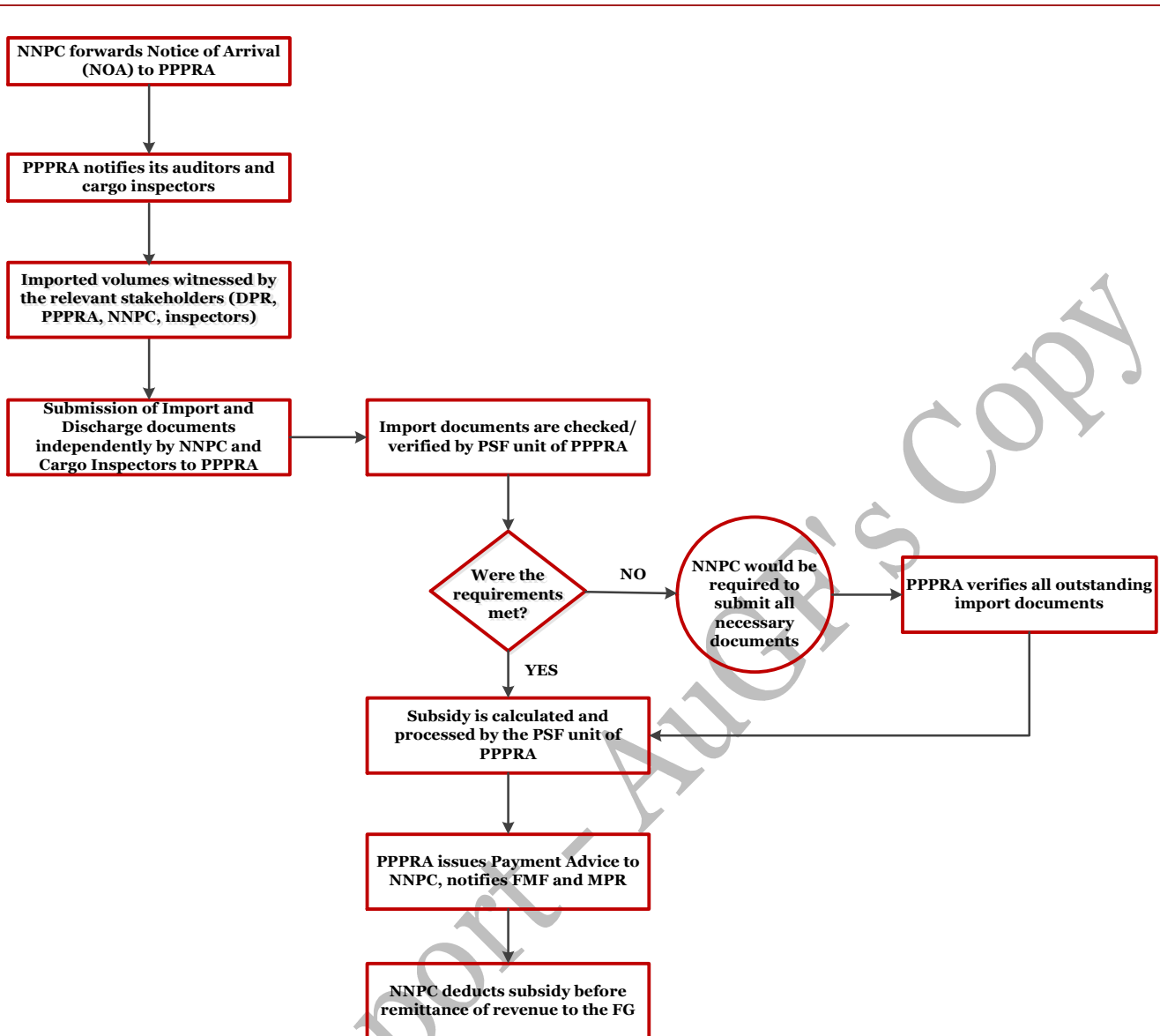
4.4.1. Introduction

- Petroleum products subsidies in Nigeria are a form of government intervention designed to alleviate the effect of possible high retail prices of finished petroleum products (PMS & DPK) produced in Nigerian refineries or imported from other countries.
- Unlike Other marketers that use cash or source for funds from financial institutions to import finished petroleum products (PMS & DPK) into Nigeria, NNPC uses crude oil as its main medium of exchange for the finished petroleum products from other countries.
- The various activities involved in the movement of the crude oil and the ultimate importation of finished petroleum products into Nigeria is undertaken by PPMC, a subsidiary of NNPC.
- The exchange of the crude oil for the finished petroleum products is done under any of the following arrangements:
 1. Off-shore Processing Arrangements (OPAs) with foreign refineries and
 2. Swaps of crude oil for finished petroleum products (PMS & DPK).
- At the time of the arrival of the finished petroleum products (PMS & DPK), the sum of the international market price of the finished petroleum products (Platt Prices) and the additional costs involved in moving the products into the shore tanks of NNPC or the dealers, is referred to as the Landing Cost. The Landing Cost is usually higher than the price that the Federal Government of Nigeria has required that the finished petroleum products be sold to the retailers/dealers at the Depot (Ex-Depot Price).
- The difference between the Landing Cost and the Ex-Depot Price is the subsidy due. Apparently, for NNPC, subsidies are therefore inherent in the process of converting domestic crude to PMS and DPK which must be sold at the prices regulated by the Federal Government of Nigeria.
- At the time of importation of the finished petroleum products into Nigeria, PPPRA is required to verify the quantity delivered in the Shore Tanks, examine the import documents required for petroleum products importation per the Petroleum Support Fund (PSF) Guidelines⁴¹, and thereafter issue a Payment Advice to NNPC on the amount deductible as subsidy.
- Unlike PMS that is received and stored in the storage tanks owned or leased by NNPC/PPMC, DPK is usually sold on arrival to interested marketers at prices determined and managed by the Inland Sales Department of PPMC. After the sales of DPK to interested marketers, the marketers usually engage the services of different vessels (i.e. Shuttle Vessels) other than the Mother Vessel to move the DPK purchased from PPMC to their own storage locations or jetties.

PPPra's Import Verification process for NNPC's Imports

The diagram below illustrates the processes/activities involved in the verification of petroleum products importation into Nigeria.

⁴¹PSF Guidelines – Framework and procedures for the administration of the petroleum products subsidy scheme in Nigeria



Source: PSF Guidelines

4.4.2. Procedures Performed

- Held discussions with the principal officers of PPPRA to understand PPPRA’s role in the Petroleum Products Subsidy Scheme in Nigeria.
- Reviewed the PPPRA Act to understand PPPRA’s roles and responsibilities in the Petroleum Products Subsidy Scheme in Nigeria.
- Reviewed the PSF Guidelines (as amended in 2010) to understand the role and responsibilities of the other stakeholders in the Petroleum Products Subsidy Scheme in Nigeria.
- Obtained from PPPRA and reviewed all Payment Advice issued to NNPC by PPPRA for all PMS and DPK discharges between January 2012 and July 2013.

- Held discussions with relevant principal officers of the Supply & Distribution Department of PPMC, to understand the various activities undertaken by PPMC in the importation of PMS and DPK.
- Obtained and reviewed PPMC's records of PMS and DPK importation into Nigeria between January 2012 and July 2013.
- Obtained and reviewed some correspondence/letters between PPMC and PPPRA to identify past issues raised by PPPRA and responses given by PPMC on PMS and DPK importation into Nigeria between January 2012 and July 2013.
- Using PPMC's records and documents provided for PMS and DPK importation into Nigeria between January 2012 and July 2013, we summed up the total volume of DPK sold to other Nigerian marketers.
- Obtained and reviewed samples of Pro Forma Invoices (PFIs) issued by PPMC to other Nigerian marketers at the point of sale of DPK between January 2012 and July 2013, to ascertain the prices charged by PPMC for the sale of DPK.
- Held discussions with some Nigerian marketers to understand the procedures and activities involved in the purchase of DPK from NNPC/PPMC.
- Obtained and reviewed public information for the actual retail prices of PMS and DPK in Nigeria.
- Held discussions with some officers of NNPC and PPMC to understand the components of the selling price of DPK contained in the Pro Forma Invoices (PFIs) issued to other marketers in Nigeria.
- We made adjustments to the actual Landing Costs (LC) of DPK by excluding other cost elements incurred by other marketers but which have been included in the PPPRA's DPK Subsidy computations. This was to estimate the actual cost incurred by NNPC to bring the product Offshore Lagos.
- For the purpose of comparison with the Report of the Reconciliation Committee, we adopted the exchange rate of \$1=₦154.87, used by the Reconciliation Committee.
- Subscribed to and reviewed records of global vessels in the Lloyds List Intelligence as well as Thompson Reuters Eikon Databases, to confirm the existence/presence of the Mother Vessels and Shuttle Vessels recorded to have discharged petroleum products (PMS & DPK) in Nigeria.

4.4.3. Limitations

- We were not provided with and could not review all the working papers used in generating the market prices and volumes used in the joint submissions of DPR, PPPRA and NNPC to the Senate.
- We did not test the authenticity of the documents presented to us by PPPRA, NNPC as well as all other subsidiaries of NNPC.
- Lloyds List Intelligence and Thompson Reuters Eikon databases could not provide information on the ownership of the products being carried by vessels or the kind of petroleum products (e.g. DPK or PMS) being carried.
- We could not verify all additional costs incurred by other marketers after buying DPK from PPMC to explain the difference between the official retail price of DPK (₦50) and the actual retail price (₦120 – ₦140⁴²).

4.4.4. Key Findings

4.4.4.1. Issues in the verification process of NNPC's PMS and DPK discharges by PPPRA

- In its letter of 24 September 2012 with reference number PPMC/S&D/049⁴³ to PPPRA, PPMC stated its challenges in putting together all the import documents for discharges that occurred before September 2012, and requested for waivers on these pre-September 2012 imports. This letter was signed by Engr K.O.K Omiogbemi on behalf of the MD of PPMC and acknowledged as received by PPPRA on 3 October 2012.
- In its response to the letter of 24 September 2012 from PPMC, PPPRA in a letter⁴⁴ signed by V.Z. Shidok, with reference number PPPRA/LZ/IM.77/1/110 on 3 October 2012 stated as follows:

“...While appreciating the concerns of PPMC on the issues raised in the referred letter, we equally wish to state that our request was occasioned by the on-going probe on PSF administration by investigators appointed by the government for that purpose. You would recall that prior to the present investigation, the said documents were being overlooked by the Agency (PPPra) but the demand for the documents by the investigators, have made it more compelling for them to be made available, more so that they can easily be sourced from the cargo suppliers. ...”

⁴² Source: <http://www.thisdaylive.com/articles/kerosene-dpr-tasks-private-depot-owners-on-high-price/164477/>

⁴³ Exhibit D2 – PPMC's letter of request for waiver to PPPRA as a result of unavailable import documents

⁴⁴ Exhibit D3 – PPPRA's first response to PPMC on the request for import documents waiver

- In another letter of 23 November 2012 with reference number PPPRA/LZ/IM.29/1/53⁴⁵, PPPRA consented to granting waivers on the import documents that were not considered sensitive. The letter however did not define what a sensitive document was. A section of the letter which was signed by V.Z. Shidok, is as follows:

“At that meeting (12 November 2012 meeting between PPPRA and PPMC) with the PPPRA it was resolved that the PPMC should as a matter of necessity, comply with the new checklist and where there are challenges regarding laying hold on documents of vessels that discharged their cargos prior to the issuance of the new checklist, the PPPRA will consider the submissions on the basis of each transaction with the view to giving a waiver on those documents that are considered not too sensitive.”

4.4.4.2. \$0.98 billion over-claim of subsidies by NNPC for the review period

4.4.4.2.1. PMS Subsidy

- PPPRA, for the purpose of subsidy computation, verified 5,956,799,041 litres of PMS discharges between January 2012 and July 2013, and issued Payment Advice of ₦341,368,411,161.38 for the verified volume to NNPC between January 2012 and July 2013⁴⁶.
- In 2014, PPPRA verified and advised additional 8,296,808,838.15 litres of PMS and issued Payment Advice of ₦405,724,354,637.17⁴⁷ for this volume.
- During our field work at PPPRA, we were provided with and reviewed schedules containing additional 1,754,158,047 litres of PMS imports and production with total computed subsidy of ₦86,470,326,324.45 acknowledged and verified by PPPRA but for which it had not completely issued Payment Advice.
- Table D1 below is a summary of the points above:

⁴⁵ Exhibit D4 – PPPRA’s consent to grant import documents waiver to PPMC

⁴⁶ Appendix 6.1.20 - Summary of the PMS & DPK Volume Verified and Advised by PPPRA for Subsidy between January 2012 and July 2013

⁴⁷ Appendix 6.1.22 – Summary of PMS & DPK Verified and Advised by PPPRA in 2014

PMS Imports and production between Jan 2012 and Jul 2013	Volume (Litres)	Subsidy ₦	Subsidy \$
Verified and advised by PPPRA between January 2012 and July 2013	5,956,799,041.00	341,368,411,161.38	2,204,225,551.50
Verified and advised by PPPRA in 2014	8,296,808,838.15	405,724,354,637.17	2,619,773,711.09
Acknowledged and verified by PPPRA but yet to be advised	1,754,158,047.00	86,470,326,324.45	558,341,359.36
	16,007,765,926.15	833,563,092,123.00	5,382,340,621.96

Table D1: Summary of PMS Subsidy (January 2012 – July 2013). **Source:** PPPRA Payment Advice, PPPRA records of verified imports, PwC Analysis

4.4.4.2.2. DPK Subsidy

- There was no evidence that PPPRA verified any of the DPK imported into Nigeria by NNPC/PPMC between January 2012 and July 2013 within the same period.
- In 2014, PPPRA verified and advised 4,406,522,494 litres of DPK and issued Payment Advice of ₦464,040,405,196.50 for this volume.
- During our field work at PPPRA, we were provided with and reviewed schedules containing additional 838,042,186 litres of DPK imports and production, with computed subsidy of ₦94,864,657,747.39 acknowledged and verified by PPPRA but for which it had not issued Payment Advice.
- Table D2 below is a summary of our finding on DPK subsidy:

DPK Imports and production between January 2012 and July 2013	Volume (Litres)	Subsidy ₦	Subsidy \$
Verified and advised by PPPRA between January 2012 and July 2013	Nil	Nil	Nil
Verified and advised by PPPRA in 2014	4,406,522,494	464,040,405,197	2,996,322,110
Acknowledged and verified by PPPRA but yet to be advised	838,042,186	94,864,657,747	612,543,796
	5,244,564,680	558,905,062,944	3,608,865,906

Table D2: Summary of DPK Subsidy (January 2012 – July 2013) . **Source:** PPPRA Payment Advice, PPPRA records of verified imports, PwC Analysis

4.4.4.2.3. Inclusion of Quarter 4 2011 discharges in the Subsidy claim for the review period (January 2012 to July 2013) by NNPC

- During our review of NNPC’S supporting documents for the subsidy due between January 2012 and July 2013, we noted the following:
 - Inclusion of PMS discharges between October 2011 and December 2011 of 2,066,025,835 litres with a computed subsidy of \$1,056,426,431.26⁴⁸.
 - Inclusion of DPK discharges between October 2011 and December 2011 of 198,080,602.56 litres with a computed subsidy of \$198,080,602.56. (Please see Appendix 6.1.24).
- Thus, subsidy amount of \$1,254,507,033.82 which relates to PMS and DPK discharges between October 2011 and December 2011, were included in the explanations of PPMC as one of the reasons for the difference between the revenue realized and remitted into the Federation Accounts by NNPC between January 2012 and July 2013. This was however stated by the Reconciliation Committee as \$1.2 billion.
- Per our discussion with NNPC, we understood subsidy is inherent in the process of transforming the crude oil lifted through Swap and OPA into finished petroleum products⁴⁹.
- Thus, the subsidy claim of Quarter 4, 2011 would have related to crude oil lifting of 2011 and should not have been added to the subsidy claim between January 2012 and July 2013.

4.4.4.2.4. Summary

Table D3 below is a summary of our comparison of the subsidy computation per the Reconciliation Committee Report and our reviews:

Description	Rec. Committee \$'Billion	Our Review \$'Billion	Difference \$'Billion
Quarter 4, 2011 PMS & DPK Discharges	1.2	Nil	(1.20)
PMS Import and production between Jan 2012 and Jul 2013	5.25	5.38	0.13
DPK Import and production between Jan 2012 and July 2013	3.52	3.61	0.09
	9.97	8.99	(0.98)

Table D3: Comparison of the Reconciliation Committee and our Computation (January 20120 – July 2013). **Source:** Report of the Reconciliation Committee; PPPRA records of verified import; PwC Analysis

⁴⁸ Appendix 6.1.24 - Quarter 4, 2011 Discharges included in the Report of the Senate Committee on Finance on the Investigation of the Alleged Unremitted \$49.8 Billion Oil Revenue by NNPC

⁴⁹ Section 3.3.3 Domestic crude oil and revenue flow

4.4.4.3. \$24 million over-claim of PMS subsidy as a result of duplicated discharges in the PPPRA certificates to NNPC

- Data analytics carried out on the following data sets received from PPPRA indicated some duplications of previously verified discharges of PMS by PPPRA:
 - January 2012 to July 2013 PMS discharges verified and advised between January 2012 to July 2013.
 - January 2012 to July 2013 PMS discharges verified and advised in 2014.
 - January 2012 to July 2013 PMS discharges acknowledged and verified but yet to be advised.
- Comparison of the quantity of the products conveyed by the Mother Vessels and the total quantity discharged by all the connected Shuttle Vessels indicated some duplication.
- The table below is the summary of the mother vessels and all the discharges with which we identified duplications. The details of these discharges are contained in Appendix 6.1.30 of this report. The over claim of subsidy as a result of the duplication amounted to ₦3,709,879,189.80 (\$23,954,795.57).

The details of the repeated verifications are as follows:

Date of Discharge	Discharge Depot	Observed Vol (Ltrs)	Landing Cost ₦	Subsidy Due ₦
21-May-12	FORTE OIL, TOTAL, NIPCO & OANDO	18,216,777.00	156.47	1,365,529,603.92
21-May-12	NIPCO/Total/Forte Oil/Oando	18,216,777.00	142.96	1,119,420,946.65
		36,433,554.00		2,484,950,550.57
10-Jun-12	Bovas Depot	6,543,163.00	153.48	470,911,441.11
10-Jun-12	Bovas	6,543,163.00	153.62	466,155,095.00
		13,086,326.00		937,066,536.11
14-Sep-12	Folawiyo	44,320,751.00	123.78	1,873,438,144.77
14-Nov-12	Nispan	44,320,751.00	123.78	1,873,438,144.77
		88,641,502.00		3,746,876,289.54
Subsidy Over-statement (highlighted)- ₦				3,709,879,189.80
Subsidy Over-statement (highlighted) - \$				23,954,795.57

Table D4: Details of repeated verifications of PMS between January 2012 and July 2013

4.4.4.4. \$40 million over-claim of DPK subsidy as a result of duplicated discharges in the PPPRA certificates to NNPC

- Data analytics performed on the following data sets received from PPPRA indicated some duplications of previously verified discharges of DPK by PPPRA:
 - January 2012 to July 2013 DPK discharges verified and advised in 2014.
 - January 2012 to July 2013 discharges acknowledged and verified but yet to be advised.
- Comparison of the quantity of the product conveyed by the Mother Vessels and the total quantity discharged by all the connected Shuttle Vessels indicated some duplication.

- The table below is a summary of the mother vessels and all the discharges with which we identified duplications. The details of these discharges are contained in Appendix 6.1.30 of this report. The over claim of subsidy as a result of the duplication amounted to ₦6,169,502,266 (\$39,836,651.81).

The details of the repeated verifications are shown in the Table below:

Shuttle Vessel	Date Of Discharge	Discharge Depot	Observed Vol (Ltrs)	Landing Cost ₦	Subsidy Due ₦
Zoja 1	23-Oct-12	Capital	12,181,714	148.11	1,383,842,710
Zoja I	23-Oct-12	Capital	12,181,714	148.11	1,383,842,710
Zoja I	28-Oct-12	Jetty	12,181,714	148.11	1,383,842,710
			36,545,142		4,151,528,131
Ore Ofe Ex Zoja I Ex Gamma Tank	7-Apr-12	Honeywell	6,069,209	144.05	664,821,154
Mt Ore Ofe Ex Zoja I	7-Apr-12	Honeywell	6,069,209	144.05	664,821,154
ORE OFE Ex NS Spirit	19-Feb-12	Sea Petroleum	6,202,958	144.05	679,472,019
Ore Ofe	19-Feb-12	SPG	6,202,958	144.05	679,472,019
ITRI Ex Zoja 1 Ex Gamma Tank	9-Mar-12	Aquitane	6,213,264	144.05	680,600,939
Itri Ex Zoja I	9-Mar-12	Aquitane	6,213,264	144.05	680,600,939
Blue River	22-Feb-12	Zenon	6,170,560	144.04	675,861,437
BLUE RIVER Ex Jamar	23-Feb-12	Zenon Pet	6,170,560	144.04	675,861,437
			49,311,982		5,401,511,098
Mt Sea Pioneer	16-Nov-12	A-Z Storage	6,157,222	148.37	701,061,297
Sea Pioneer Ex Zoja Ii	17-Nov-12	A-Z Depot	6,157,222	148.37	701,061,297
			12,314,444		1,402,122,594
Subsidy Over-statement (highlighted)			55,176,641		6,169,502,266
Subsidy Over-statement (highlighted) - \$					39,836,651.81

Table D5: Details of repeated verifications of DPK between January 2012 and July 2013

4.4.4.5. PMS Subsidy Over-Statement of \$36,045,669 in PPPRA's Payment Advice to NNPC

- Our review of the Subsidy Payment Advice sent by PPPRA to NNPC for discharges between January 2012 and July 2013 revealed that PPPRA applied the pre-2012 Ex-Depot Price (₦49.51) on some discharges in 2012 instead of the approved Ex-Depot Price of ₦81.51 prevailing at the time.
- PPPra sent a letter on 6 May 2014 to NNPC, acknowledging that PPPRA had applied ₦49.51 as the ex-depot price on some discharges instead of ₦81.51 (Please see exhibit D5).
- 174,449,778 litres of PMS were affected by this computation.
- Table D6 below shows a summary of our review of these discharges⁵⁰.

⁵⁰ See detailed breakdown in Appendix 6.1.23 - Over Statement of PMS Subsidy by PPPRA

Description	Amount
Official Ex-Depot Price from January 2012	₦81.51
Actual Ex-Depot Price applied for some discharges in February 2012	₦49.51
Volume affected (Litres)	174,449,778
Adjustments for the application of ₦49.51 for discharges between February 2012 and July 2013)	₦5,582,392,896
Using \$1 = ₦154.87, PMS Subsidy Over Statement	\$36,045,669

Table D6: Re-computation of the Subsidy advised by PPPRA using old ex-depot price (₦49.51) in February 2012; Source: PPPRA Payment Advice; PPPRA Pricing Template, PwC Analysis

4.4.4.6. DPK Subsidy Over-Charge of \$203,539,968 by NNPC

- Our review of a sample of the copies of the Pro Forma Invoices (PFIs) issued to the other marketers⁵¹ of DPK across different geopolitical zones of Nigeria, revealed that the Other marketers bought DPK from NNPC/PPMC Offshore Lagos⁵² at ₦40.90.
- The Other marketers are thereafter required to incur the following expenses:

Description	Amount ₦
Lightering expenses	4.07
NPA Charge	0.68
Jetty Depot Throughput	0.80
Storage Charge	3.00
Minimum cost to Other marketers	8.55

Table D7 – Costs borne by other marketers after purchase of DPK from PPMC

- Our assumptions for the calculation of the over charge of subsidy are as follows:
 1. Per our review of PPMC's Schedule of PMS and DPK imports obtained from PPMC, 3,686,811,097 litres of DPK were transferred through Shuttle to Shuttle (STS) system to other marketers between January 2012 and July 2013.
 2. Subsidy is calculated as follows:

$$\text{Under-recovery/Subsidy} = \text{Landing Cost} - \text{Ex-Depot Price}$$
 3. Per PPPRA's template, Landing Cost also includes Lightering expenses (₦4.07), NPA charges (₦0.68), Jetty Throughput Charge (₦0.80) and Storage Charges (₦3.00).
 4. NNPC/PPMC confirmed to us that the Other marketers incur Lightering expenses (₦4.07), NPA charges (₦0.68), Jetty Throughput Charge (₦0.80) and Storage Charges (₦3.00) on their own after purchase of DPK from NNPC/PPMC offshore Lagos.
 5. PPPRA as well as PPMC had included the costs in (3) above in their computations of the Landing Costs.
 6. Using PPPRA's template, the total of the other costs incurred by the other marketers, as reflected in (3) above is ₦8.55.

⁵¹ See Appendix 6.1.26. Summary of DPK Purchases from PPMC by Other marketers between January 2012 and July 2013

⁵² Offshore Lagos – A location within the Nigerian waterways before the Nigerian Ports in Apapa

7. We applied an exchange rate of \$1 = ₦154.87.

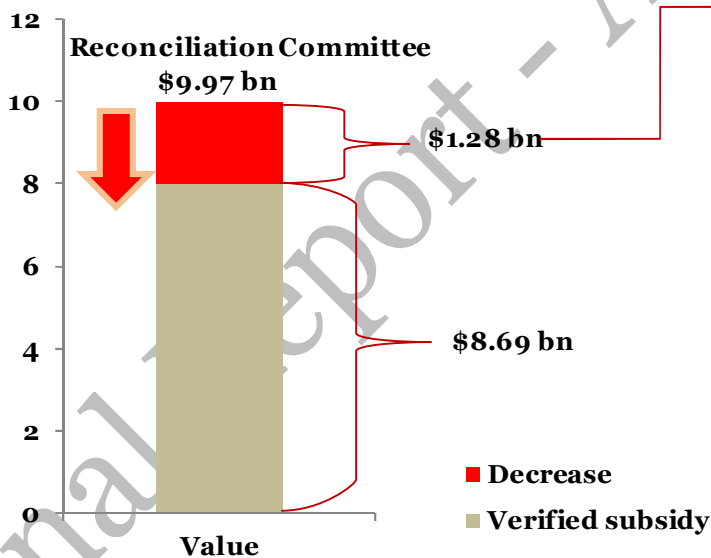
Thus, the over deduction of subsidy is calculated as follows:

Description	Amount ₦
Subsidy Over Charge	Volume Sold to Other marketers * Other Landing Cost Components paid by Other marketers
STS Volume Sold to Other marketers	3,686,811,097 litres (See Appendix 6.1.26)
Other Landing Cost Components paid by Other marketers	₦8.55 (See Table D7 above)
Subsidy Over Charge	3,686,811,097.20 * ₦8.55
Subsidy Over Charge	₦31,522,234,881.06
Subsidy Over Charge	\$203,539,968 using an exchange rate of \$1 = ₦154.87

Table D8: Estimate of DPK Subsidy over deduction by NNPC; Source: PPPRA Pricing Template, PPMC's records of DPK imports; PPMC's records of DPK sales to other marketers, Sample of PFI received from PPMC

4.4.5. Summary of Findings

Summary of findings



Section	Adjustment (\$bn)
4.4.4.2.1	0.13
4.4.4.2.2	0.09
4.4.4.2.3	(1.20)
4.4.4.3	(0.02)
4.4.4.4	(0.04)
4.4.4.5	(0.04)
4.4.4.6	(0.20)
Total	(1.28)

4.4.6. Other Findings

4.4.6.1. PPMC is the sole importer of DPK in Nigeria and sells Offshore Lagos at an amount higher than the Regulated/Official Ex-Depot Price

Per PPPRA, the expected/official retail price of DPK in Nigeria is ₦50. This comprises the following:

Description	Amount ₦
Ex-Depot Price/Litre	34.51
Margin to stakeholders/Litre	15.49
Official Retail Price/Litre	50.00

Table D9: Analysis of the Official Retail Price of DPK; Source: PPPRA HHK Pricing Template

The Ex-Depot Price is the expected/official price at which DPK should be sold at NNPC's depot in Nigeria. The Margin to stakeholders includes the following:

Description	Amount ₦
i. Retailers margin/Litre	4.60
ii. Transporters Margin/Litre	2.99
iii. Dealers margin/Litre	1.75
iv. Bridging Fund/Litre	5.85
v. Marine Transport Average (MTA)/Litre	0.15
vi. Admin Charge/Litre	0.15
Distribution margin to stakeholders	15.49

Table D10: Analysis of the distribution margin on DPK; Source: PPPRA HHK Pricing Template

- Per PPMC, DPK was sold before arrival in Nigeria, to other marketers between January 2012 and July 2013 at ₦40.90. Apparently, this is above the official ex-depot price of ₦34.51 after arrival in Nigeria.
- PPMC confirmed to us that the ₦40.90 selling price to other marketers includes the Official Ex-Depot Price – ₦34.51, Bridging Fund per litre – ₦5.85, Marine Transport Average (MTA) per litre – ₦0.15 and the Admin Charge per litre – 0.15, indicated as iv, v, and vi in Table D10. PPMC did not provide explanation for the balance of ₦0.24.
- The sales of DPK to Other marketers outside Nigeria are handled by the Inland Sales Department of PPMC.
- Each sale of DPK by PPMC to the Other marketers is evidenced by a Pro Forma Invoice (PFI) prepared and signed by PPMC stating the volume and the price at which a litre of DPK is sold (Please see Exhibit D6 for a sample of the Pro Forma Invoice (PFI)).

4.4.6.2. Divergence between the Official Retail Price, Expected Retail Price and Actual Retail Price of DPK

- PPMC confirmed to us that after buying at ₦40.90 from NNPC/PPMC, the other marketers bear the cost of Lightering, NPA charges, Jetty throughput and Storage Charge which were expected to have been borne by NNPC/PPMC if NNPC were to bring DPK into its depots in Nigeria and sell at an ex-Depot price of ₦34.51 to other marketers.
- Using the PPPRA's template for the calculation of the Landing Cost of DPK, the minimum cost to the other marketers that ultimately bring DPK into Nigeria is ₦49.45 and not the official ex-depot of ₦34.51. Please see the table below for a breakdown of this minimum cost to the Other marketers.

Description	Amount ₦
Cost of purchase from NNPC/PPMC	40.90
Lightering expenses	4.07
NPA Charge	0.68
Jetty Depot Throughput	0.80
Storage Charge	3.00
Minimum cost to Other marketers	49.45

Table D11: Analysis of the minimum cost of DPK to Other marketers; Source: NNPC/PPMC DPK PFI, PPPRA HHK Pricing Template

Using the minimum cost to the other marketers (₦49.45) and other parameters in the PPPRA's Pricing Template, the expected retail price of DPK in Nigeria is reflected in the table below:

Description	Amount ₦
Minimum cost to other marketers per Litre	49.45
Retailers margin/Litre	4.60
Transporters Margin/Litre	2.99
Dealers margin/Litre	1.75
Expected Retail Price	58.79

Table D11: Analysis of the minimum retail price of DPK to Consumers; Source: NNPC/PPMC DPK PFI, PPPRA HHK Pricing Template

- Information in the public domain⁵³ revealed that the actual retail price of DPK sold by most marketers in Nigeria ranges between ₦120 and ₦140.
- NNPC, PPMC as well as PPPRA could not provide explanations for the difference between the expected retail price of DPK of ₦58.79 and the actual retail price per litre.
- The diagram below illustrates our findings on the pricing of DPK:

⁵³ Actual retail price of DPK - <http://www.thisdaylive.com/articles/kerosene-dpr-tasks-private-depot-owners-on-high-price/164477/>

DPK Pricing Process - Illustrative Diagrams

How DPK pricing should work



Description of Margin	N
Bridging fund	5.85
MTA	0.15
Admin Charge	0.15
Retailers	4.60
Transporters	2.99
Dealers	1.75

How DPK pricing actually works



Description of Cost	N
Lightering	4.07
NPA Charge	0.68
Jetty Throughput	0.80
Depot Charge	3.00

Description of Cost	N
Retailers	5.85
Transporters	0.15
Dealers	0.15

4.4.6.3. Report on Vessel Movements

Between January 2012 and July 2013, PPMC claimed 283 vessel discharges of PMS. These 283 vessels were either mother vessels that came directly from the Port of Origin or shuttle vessels that the mother vessels transhipped PMS into for subsequent delivery in Nigeria.

Between January 2012 and July 2013, PPMC claimed 100 vessel arrivals of DPK Offshore Lagos.

To confirm whether or not these vessels were in Nigeria as at the dates of discharge recorded by NNPC/PPMC, we carried out the following tasks:

1. Reviewed Movement⁵⁴ information on Lloyds List Intelligence Database (“Lloyds”)⁵⁵. At the end of our review of the Vessel Movement information, we noted the following:
 - a. 2 DPK vessel without records of presence in Nigeria/West Africa between January 2012 and July 2013 per Lloyds’ Movement records
 - b. 1 DPK vessel without records of presence in Nigeria but seen in West Africa (Ivory Coast) between January 2012 and July 2013
 - c. 6 DPK vessels with 8 discharges in Nigeria in periods other than the dates of discharge indicated in PPMC and PPPRA’s records.
 - d. 14 PMS vessels with 15 discharge records per PPMC, without evidence of presence in Nigeria per Lloyds’ Movements records.
2. We however noted gaps in the dates covered by Lloyds in its Movements records. Please see appendix 6.1.28 for the details of the vessels above and Exhibits (DPK 1 to DPK 9) for the Movement reports.
3. We contacted Lloyds to validate our findings that the 23 vessels above were not in Nigeria and to inform them about the gaps we noticed in the information in their Database.
4. Lloyds confirmed to us in a teleconference held on 14 October 2014, that it was possible for us to have noticed gaps in the information provided in their Movements database.
5. On 14 October 2014, Lloyds did a walkthrough with us on the use of their AIS Sightings⁵⁶ record, before making a conclusion on the presence or absence of the questionable vessels in Nigeria.
6. Subsequently, we reviewed the information captured on the Lloyds’ AIS Sightings and noted the following:
 - a. 2 DPK vessels without records of presence in Nigeria/West Africa between January 2012 and July 2013 per Lloyds’ Movement records were captured by the AIS to have come to Nigeria on their discharge dates.
 - b. 1 DPK vessel without records of presence in Nigeria but seen in West Africa (Ivory Coast) between January 2012 and July 2013 per Lloyds’ Movement records were captured by the AIS to have come to Nigeria on their discharge dates.
 - c. 6 DPK vessels with 8 discharges in Nigeria in periods other than the dates of discharges per Lloyds’ Movement records were captured by the AIS to have come to Nigeria on their discharge dates.

⁵⁴ A manual record of vessel movements on Lloyds List Intelligence Database

⁵⁵ Lloyds List Intelligence Database (“Lloyds”) – A public database that records boats, yachts, tugs and all other vessel movements globally. It has a manual record of vessel movement (Vessel Movement tab) as well as the satellite (Automatic Identification System –AIS) record of vessel movements. – www.lloydslistintelligence.com

⁵⁶ AIS Sightings – Satellite records of vessel movements globally

- d. 13 PMS vessels with 13 discharge records per PPMC, without evidence of presence in Nigeria per Lloyds' Movements records were captured by the AIS to have come to Nigeria on their discharge dates.
- e. 1 PMS Vessel (Perla) with 2 discharge records per PPMC was not traceable to Nigeria either on the Movement records or on the AIS Sightings.
7. To validate our findings, we requested that Lloyds confirm to us that "Perla" was not in Nigeria during the period of discharges recorded by PPMC.
8. In an e-mail of 15 October 2014⁵⁷, Lloyds confirmed to us that "Perla", with IMO⁵⁸ number 9258129, was not present in Nigeria between January 2012 and April 2012 (the supposed period of discharge per PPMC's records).
9. To have another third party confirmation of the absence of "Perla" on the supposed dates of discharge in Nigeria, we placed another subscription with Thompson Reuters Eikon⁵⁹.
10. Our review of Thompson Reuters Eikon database revealed that there are 4 vessels named as "Perla".
11. We reviewed the shipping movement records of all these vessels and noted that a "Perla" with IMO number 8405842⁶⁰, was in Nigeria to berth at NNPC terminals between January 2012 and April 2012. This "Perla" was active between January 2012 and April 2012, and dead as at the time of this report.
12. We used the IMO number we noted on Thompson Reuters Eikon, to search the Lloyds and a vessel with the name "Perin"⁶¹ showed up. "Perin" was captured by Lloyds to have visited Nigeria between January 2012 and April 2012.
13. Per Lloyds' vessel report, "Perin" was named as "Perla" between 3 August 2010 and 4 March 2014.
14. "Perin" was active between January 2012 and April 2012, but dead as at the time of this report.
15. The inability of Lloyds to have captured "Perla" with IMO number 8405842 was as a result of the name change and its subsequent death.
16. From the foregoing and with the available public records/reports attached as exhibits to this report, all the vessels recorded by PPMC to have discharged PMS and DPK in Nigeria between January 2012 and July 2013, were captured in public databases (Lloyds List Intelligence and Thompson Reuters Eikon) to have visited Nigeria during this period.

⁵⁷ Exhibit PMS 15 – Email confirmation from Lloyds

⁵⁸ IMO – This is the unique identifier for every vessel

⁵⁹ Thompson Reuters Eikon - A public database for shipping records as well as financial and market researches

⁶⁰ Exhibit PMS 17 – Thompson Reuters report on Perla

⁶¹ Exhibit PMS 16 - Perin

4.5. NPDC Liftings

4.5.1. Introduction

NPDC has the following assets:

- 100% ownership of five (5) blocks: OMLs 64, 65, 66, 111 & 119;
- 55% equity in eight (8) blocks: OMLs 4, 26, 30, 34, 38, 40, 41 & 42;
- 60% participatory interest in (4) blocks: OMLs 60, 61, 62 & 63; as well as
- Varied interest in seven (7) deep water concessions⁶².

NPDC, like other upstream petroleum companies, is statutorily expected to pay Royalty and Petroleum Profit Tax on its operations. Royalty is deducted from revenues as a first line charge while taxes are computed after deducting qualifying costs.

Between 2010 and 2011, Shell Petroleum Development Corporation (SPDC) sold its 45% Joint Venture minority stakes in eight onshore marginal fields to indigenous oil companies⁶³. The NNPC further sold its interests in the divested assets to its fully owned subsidiary, NPDC.

The divested assets are being funded through Strategic Alliance Arrangements (SAAs) with Septa Energy and Atlantic Energy. The company has also been running a Service Contract in its offshore operations with Agip Energy and Natural Resources Ltd since 2001.⁶⁴

- **Atlantic Energy**⁶⁵: a private Nigerian-owned group of E&P companies, focused on optimising under-developed assets in the Niger Delta, with offices in Lagos, London and Zurich. The company has SAAs in place with the NPDC relating to NPDC's 55% operated interest in OML 26, OML 30, OML 34, OML 42 since 2011. NPDC holds a 55% legal interest and is the operator of the OMLs. As part of the SAAs attributed to these leases, Atlantic Energy (the SAA contractor) provides direct advice to NPDC on commercial, technical and financial matters as well as pays NPDC's share of OPEX and CAPEX cash calls. Atlantic Energy then receives 100% cost recovery of the OPEX and CAPEX cash calls and a percentage share of Profit Oil from NPDC's 55% working interest. The SAA contractor receives its entitlement from independent oil lifting rights.
- **Septa Energy**⁶⁶: is an indigenous Nigerian oil and gas production development company. It has an upstream portfolio of assets onshore in the Niger Delta. The company has production interests in OML 4, 38 and 41 through a Strategic Alliance and Service Contract with NPDC. These assets sit within two core areas located in the South East and North West Niger Delta. Under the arrangement, Septa is required to match NPDC's 55% share of petroleum operation costs for the development of the OMLs as well as provide training facilities for NNPC/NPDC

⁶² Source: www.npdc.nnpcgroup.com; Please note that we did not obtain any information directly from NPDC, and cannot also confirm the completeness and accuracy of information on the Company's website.

⁶³ CBN's submission to the Senate Committee

⁶⁴ NPDC's Submission to the Senate Committee

⁶⁵ We obtained and reviewed a copy of the Strategic Alliance Agreement between NPDC and Atlantic Energy covering OML 30 only. The agreement alongside a Marketing Paper put together by Atlantic Energy was submitted to the Senate by CBN.

⁶⁶ We obtained and reviewed a copy of the SAA agreement between NPDC and Septa Energy covering OMLs 4,38, 41; as well as a press release by the parent company Seven Energy addressing the relationship with NNPC from www.sevenenergy.com

staff. In turn, Septa receives allocation of cost oil sufficient to recover its costs as well as share of profit oil upon the full recovery of development costs.

- **Agip Energy⁶⁷:** AENR and NPDC went into a Service Contract agreement and signed a Memorandum of Understanding (MOU) in December 2000 for the development of offshore fields, Okono and Okpohu in OML 119, under a joint operatorship. NPDC later assumed full operatorship of the fields with a sharing formula of 30% and 70% in favour of AENR and NPDC respectively.

4.5.2. Procedures Performed

The following were the procedures performed to meet our objectives:

- Requested for but did not receive the following from NPDC:
 - Detailed breakdown of the crude oil assets transferred to NPDC
 - Terms of divestment and contract documents involving the assets taken over
 - Strategic Alliance agreements between NPDC and counterparties
 - Monthly volume allocations to Strategic Alliance Partners
 - Monthly balance of NPDC crude over/under lifts by Strategic Alliance partners
 - List of receiving banks, account numbers and bank statements for NPDC crude proceeds
- Held a meeting with the former Group Executive Director, Exploration & Production of NNPC, Dr Joseph Dawha and former MD NPDC Mallam Hamidu Namtari, to inform them of our engagement and request further meetings to obtain an understanding of NPDC's processes particularly around its operations, business objectives and internal accounting/financial reporting, etc.
- Visited NNPC and NPDC websites to obtain further understanding of the company's operations.
- Reviewed NPDC's submissions to the Senate Committee to fully understand company's official position on the revenues relating to the liftings from its assets during the review period.
- Obtained information on the volumes and prices of crude oil lifted in favor of NPDC during the period under review from COMD and DPR, to verify the figures quoted by NPDC at the Senate.
- Verified pricing information and recomputed values based on lifting profile obtained from COMD and DPR.
- Confirmed royalty and tax payments to information provided by DPR and FIRS by tracing amounts to DPR and FIRS accounts with JP Morgan.
- Documented findings and conclusions.

⁶⁷ Source http://www.eni.com/en_NG/eni-in-nigeria/eni-profile/eni-profile.shtml

We did not gain access to NPDC and as such had no official information on the Service Contract.

4.5.3. Limitations

We encountered some limitations in the course of executing some aspects of our scope of work. The key limitations were:

- Unavailability of relevant NPDC personnel to provide information on the NPDC's processes particularly around its operations, business objectives and internal accounting/financial reporting, etc.
- Change of management at NPDC during the course of the engagement which further contributed to our inability to successfully obtain responses to our request for information.
- Non-response of NPDC to our request letter which meant that we weren't provided with the following requests:
 - Detailed breakdown of the crude oil assets transferred to NPDC.
 - Terms of divestment and contract documents involving the assets taken over.
 - Strategic Alliance agreements between NPDC and counterparties.
 - Monthly volume allocations to Strategic Alliance Partners per partner.
 - Monthly balance of NPDC crude over-lifts by Strategic Alliance partners.
 - List of receiving banks, account numbers and bank statements for NPDC crude proceeds.

4.5.4. Key Findings

4.5.4.1. Ownership of NPDC assets

NPDC as an incorporated company has existed and carried out petroleum exploration activities since 1988. In 2010-2011, NNPC sold its interests in the divested oil fields by SPDC to NPDC. The legality of the sale from NNPC to NPDC was widely debated during the Senate Hearings. The Attorney-General and Minister of Justice, Mr Mohammed Bello Adoke, SAN, in his letter to the Senate Committee on 18 February 2014, stated that the sale was within NNPC's authority. It was also clearly stated in the SAA with Septa Energy that the Federal Government had granted consent via a Deed of Assignment dated 16 September 2010 for NNPC to assign its interest in the contract area to NPDC.

In January 2015 (subsequent to our initial reported conclusions), we were availed with copies of Deeds of Assignment for OML's 26,30,40,42 (See exhibit I1). We were not provided with copies of Deeds of Assignment for OML's 4,38,41,34. We were also provided with information which indicated that the various NNPC (55%) portion of Oil leases (OMLs) involved in the Shell Divestments related to the eight (8) OML's afore stated, were transferred to NPDC for an aggregate Sum of US\$1.85billion (See exhibit I2). So far, only the amount of US\$100m had been remitted in relation to these assets (See exhibit I3). This means that the amount of US\$1.75billion is yet to be remitted in relation to this transfer. In addition, by a comparison of the aggregate amount of US\$1.85billion determined by DPR as the transfer value, and the (arm's length) commercial value paid for by 3rd parties for between 30% to 45% divested by Shell, we arrive at an estimated Alternative Commercial Valuation of US\$3.4billion for the NNPC 55%.

See Table below for our estimation of the expected signature bonus required to have been paid by NPDC for the divested assets. *(Please note that this is not a professional valuation, but an estimate based on publicly available information)*

Estimation of signature bonus on divested assets

Blocks	Shell's equity % before divestment [a]	Price/ Valuation (\$ million) [b]	NNPC's equity % before divestment [c]	Expected Price/ Valuation (\$ million) [b/a*c]
OML 30	45	850	55	1039
OML 34	45	588	55	719
OML 40	45	154	55	188
OML 26	30	148	55	271
OML 42	45	600	55	733
OML 4	45	386	55	472
OML 38	45		55	
OML 41	45		55	
Total		2726		3422

PwC analysis

The point here is that while we appreciate that this is a government entity to government entity transaction, we had expected a transfer basis higher than the US\$1.85billion used. We have not performed a professional valuation and therefore recommend that the valuation done by DPR be re-assessed. NNPC explained that these OML transfers were in the bid to encourage local participation in the Nigerian upstream Oil and Gas Industry.

We also expect that NPDC should remit dividends to NNPC and ultimately the Federation accounts, based on NPDC's dividend policy and declaration of dividend for the review period. We did not have access to NPDC's full accounts and records and we have not ascertained the amount of costs and expenses which should be applied to the US\$5.11billion Crude Oil revenue, net of royalties and PPT paid, (see section 4.5.5 below) per the NPDC submission to the Senate Committee hearing in order to arrive at the Net Revenue (in line with the AG's Opinion), which should be subjected to dividend remittance. We are also not aware NPDC declared dividend for the review period.

These matters need to be followed up for final resolution in terms of the NPDC Net Revenue (dividend) for Crude Oil relating to the transfers, PPT and royalty unremitted, and the transfer price valuation and remittance.

4.5.4.2. Under-recognition of NPDC crude oil lifting by \$0.82billion by Reconciliation Committee

- The Reconciliation Committee set up by the Ministry of Finance to look into the initial allegations of unremitted funds agreed the value of liftings in favour of NPDC to be **\$6billion**.
- We did not receive any supporting documentation from NPDC to validate this figure other than its submission to the Senate (summarized in Table E1 below) by its former MD, Mr

Victor Briggs, who put the total value of NPDC liftings from its traditional and divested assets at a higher figure of **\$6.82billion**.

Summary of NPDC revenues from all assets: January 2012 to July 2013

Description	Quantity lifted (bbls)	Values (\$)
NPDC Traditional assets	25,666,592	2,857,103,901
Divested assets assigned to NPDC	27,293,424	3,071,272,852
Total	52,960,016	5,928,376,753
Service Contract – Agip Energy	1,795,880	188,385,411
SAA – Atlantic	3,464,846	387,463,865
SAA – Septa	2,806,959	310,962,597
Sub-total	6,271,805	698,426,462
Total Service Contract/Strategic Alliance Agreements	8,067,685	886,811,873
Total NPDC assets	61,027,701	6,815,188,626

Table E1 – Summary of NPDC revenues from all assets: January 2012 to July 2013

Source: NPDC submission to the Senate

We however performed a re-computation of the values of liftings using information provided by the Crude Oil Marketing Division of NNPC and DPR, as summarized in Table E2 below. The DPR and COMD columns summarize our data analysis from liftings information received from DPR and COMD, while the NPDC column contains figures quoted by NPDC at the Senate.

We obtained crude oil volumes from DPR and COMD, confirmed approved pricing options applicable to sales from invoices obtained from COMD as well as the monthly approved Official Sales Price information. We then independently obtained dated Brent information from Platts and determined expected unit prices, which we multiplied by the volumes.

Recomputation of revenue from NPDC crude liftings

Description	NPDC	DPR	COMD
NPDC Crude liftings (bbls)	52,960,016	62,028,352	50,536,316
Liftings for SAA/SC partners (bbls)	8,067,685	-	-
Total liftings (bbls)	61,027,701	62,028,352	50,536,316
NPDC Crude proceeds (\$)	5,928,376,753	6,886,837,854	5,652,259,919
Liftings for SAA/SC partners (\$)	886,811,873	-	-
Total liftings (\$)	6,815,188,626	6,886,837,854	5,652,259,919

Table E2 – Summary of NPDC revenues from all assets: January 2012 to July 2013

- Per the submission of NPDC to the Senate, total crude lifted from all assets was 61million bbls which amounted to \$6.82billion. Of this amount, 8million bbls (valued at \$886million) was lifted in favour of SAA and SC partners as their entitlements under the various contracts.
- While we were unable to verify the \$6.82 billion directly at NPDC, we performed a recomputation of the values of liftings using information provided by COMD and arrived at a value of \$5.65 billion⁶⁸. These liftings were agreed to DPR lifting information. DPR however captured an extra 11.5 million bbls lifted on behalf of NPDC and its funding partners. Although the DPR information did not contain necessary pricing information, our value estimation⁶⁹ of the 11.5 million bbls was \$1.24 billion. Please see table E2 above for summary. Please note that the DPR valuation is an estimate for comparison purposes only. From the summary in table E2, we assume that the difference between the lifting value declared by NPDC at the Senate hearing and our estimate using DPR records, was due to the estimated pricing options we adopted in assigning values to lifting recorded by DPR for NPDC.
- We therefore concluded that NPDC's position of \$6.82 billion was reasonable enough to be used in our analysis.

4.5.4.3. Cash payments by NPDC to FIRS not captured by Reconciliation Committee

During our discussions with FIRS, we were informed that NPDC had not been assessed for taxation purposes for the period January 2012 – July 2013.

NPDC paid \$863million in cash to FIRS towards PPT for its crude oil activities during the review period, based on PPT estimates. These payments were confirmed by FIRS to have been received. We traced the cash payments by NPDC to CBN/FIRS bank statements with JP Morgan (as summarized in Table E3 below).

Summary of cash payments made by NPDC to FIRS

Date/period of payments	Amount (\$)
18-Apr-13	48,000,000
3-Jun-13	48,000,000
21-Jun-13	48,000,000
31-Jul-13	48,000,000
Total payments made between January 2012 and July 2013	192,000,000
Payments made after January 2014	671,000,000
Total payments relating to revenue from NPDC liftings between January 2012 and July 2013	863,000,000

Table E3 – Summary of NPDC cash payments to FIRS for liftings during period

It is important to note that even though these amounts have been paid by NPDC and confirmed by FIRS, the company needs to be appropriately assessed by FIRS to determine the exact amount due as PPT from NPDC liftings during January 2012 and July 2013. NPDC communicated an estimated PPT liability of \$1billion at the Senate Hearing (as shown in Table E4 below). We could not verify the

⁶⁸ Appendix 6.1.1 – Valuation of crude oil revenue (NPDC section)

⁶⁹ Appendix 6.1.3 – Estimated valuation of extra NPDC liftings captured by DPR

reasonableness of this estimate as we were not provided with details of NPDC costs within the review period.

Summary of NPDC's estimate of PPT accruable to the Federation

Description	Liability (US \$)	Paid (\$)
Made up of:		
NPDC Traditional assets	525,231,949	440,893,530
Divested assets assigned to NPDC	502,851,116	422,106,470
Total government entitlement	1,028,083,065	863,000,000

Table E4 – Summary of NPDC's PPT estimates

Source: NPDC Submission to the Senate

4.5.4.4. Cash payments by NPDC to DPR not captured by Reconciliation Committee

NPDC's submission to the Senate indicates a total cash Royalty payment of \$869million, related to liftings during the review period. However, DPR submitted⁷⁰ to the Senate Committee that \$864 million was received.

Cash payments made by NPDC to DPR

Date/period of payments	Amount (\$)
March 2013	71,539,940
April 2013	85,363,271
May 2013	60,159,720
June 2013	6,834,004
October 2013	278,934,251
November 2013	215,910,921
February 2014	120,249,512
Total payments	838,991,619

Table E5 – Summary of NPDC cash payments to DPR for liftings during review period

Of the total \$864,817,552 reported by DPR, we were able to trace the above receipts to DPR/CBN JP Morgan Account; thereby showing an under-remittance of \$25,825,934 to the account. In an e-mail dated 8 October 2014⁷¹, DPR confirmed to us that the variance of \$25.8 million was due to an error of duplicating the same payment on the schedule provided at the Senate Hearing. The total amount received from NPDC was therefore not \$864 million but \$838 million. It is also important to note NPDC's assertion that these statutory payments were made on the basis of estimates as summarized below.

⁷⁰ Source: DPR's submission to the Senate

⁷¹ See Exhibit E1

Summary of NPDC's estimate of Royalty accruable to the Federation

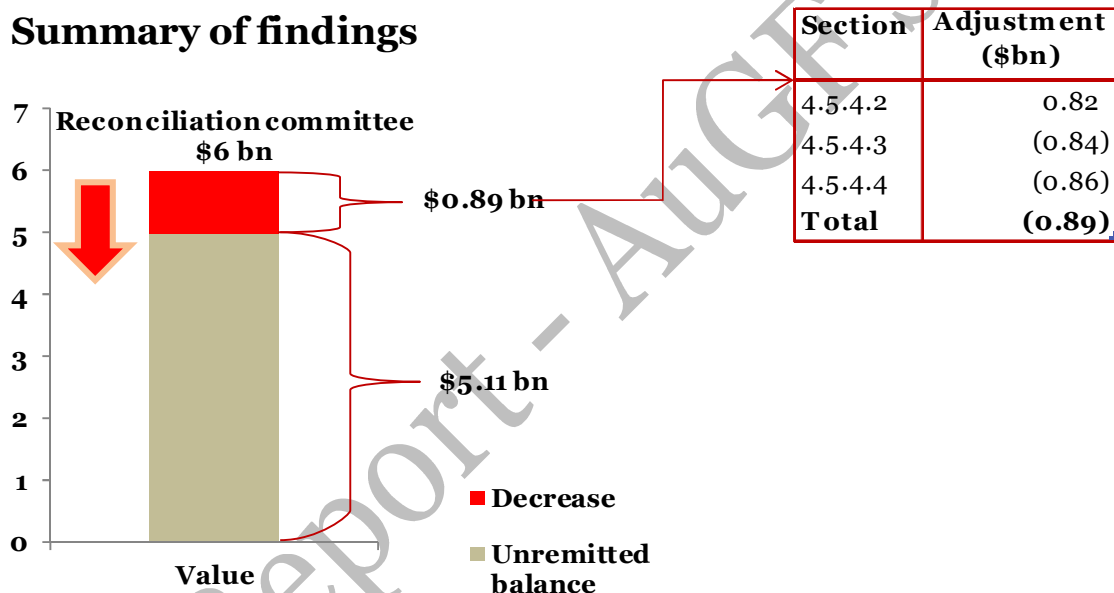
Description	Liability (\$)	Paid (\$)
Made up of:		
NPDC Traditional assets	493,069,309	541,086,319
Divested assets assigned to NPDC	654,483,062	328,903,740
Total government entitlement	1,147,552,371	869,990,059

Table E6 – Summary of NPDC's Royalty estimates
Source: NPDC Submission to the Senate

- We could not verify the reasonableness of this estimate as we were not provided with detailed breakdown of NPDC's liftings by oil licences and period of lifting in order to determine an expectation for Royalties due.

4.5.5. Summary of findings

Summary of findings



From the above sections, we have determined the impact of NPDC liftings on the alleged unremitted funds as \$5.11billion. The variance between this amount and the \$6 billion quoted by the Senate is shown in the table below:

Impact of NPDC liftings on alleged remittance shortfalls

Description	Reconciliation Committee \$	PwC Investigation \$	Variance \$
Revenue from total assets	6,000,000,000	6,815,188,626	815,188,626
Royalties paid in cash	-	(838,991,619)	(838,991,619)
PPT paid in cash	-	(863,000,000)	(863,000,000)
Unremitted from NPDC revenue	6,000,000,000	5,113,197,007	(886,802,993)

Table E7 – Impact of NPDC liftings on alleged remittance shortfalls

From the table above, our investigation revealed that the unremitted figure from NPDC liftings is \$5.11billion. The reduction from the Reconciliation Committee's \$6billion is due to an increased revenue figure of \$6.8billion (as explained in Section 4.5.4.2), as well as verified taxes and royalties (amounting to \$1.7billion) paid in cash by NPDC to DPR and FIRS which have already been remitted to the Federation Account.

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4.6. Pipeline Maintenance and Management Costs

4.6.1. Introduction

NNPC, stated that \$0.91billion had been incurred on Pipeline Maintenance and Management during the review period.

During the Senate Public hearing, the Corporation provided a breakdown of the Pipeline Maintenance and Management costs for the period January 2012 to July 2013. The costs are NNPC/PPMC internally generated costs incurred during the period, which they funded from the crude oil sales revenue before remitting to the Federation Account. The Corporation provided internal payment vouchers, approval memos and correspondences, contract awards, and remittance advices; to authenticate their claims.

We have reviewed and analysed the alleged costs claimed by NNPC, assessed the reasonableness of the claims, and matched information with sufficient support documents, in order to confirm the claim that \$0.91billion of the unremitted oil revenue was incurred on pipeline maintenance and management costs.

NNPC categorized the pipeline maintenance and management costs into the following:

1. Salaries and Upfront benefits of PPMC staff
2. Pipeline Vandalism Repair Cost
3. Pipeline Surveillance and Security Cost
4. Alternative Crude Oil Transport Cost –via Marine
5. Environmental Remediation and Community Cost
6. Management Charge out Rate
7. Capital Expenditure (CAPEX)

Components of the Cost

Salaries and Upfront Benefits of PPMC

Pipeline and Product Marketing Company (PPMC) is a fully owned subsidiary of the Nigerian National Petroleum Corporation (NNPC) responsible for the administration of the local refineries in Nigeria. They also act as the dominant supplier of all refined petroleum products⁷².

NNPC claimed the sum of \$320,971,870.60 as salary payment to PPMC's staff for January 2012 to July 2013. These costs relate to salaries and upfront payments made to PPMC staff whose functions are directly related to the supply and distribution of refined products in Nigeria.

Pipeline Vandalism Repair Cost

These were costs of repair of the pipelines vandalized across Nigeria. A total sum of \$11,896,654.70 was claimed as repair cost between January 2012 and July 2013.

Pipeline Surveillance Cost

These were payments to security agencies to facilitate logistics and the deployment of military men and Police officers to NNPC's pipelines nationwide and also the cost of maintaining the Pipelines

⁷² Source: PPMC's website

Right of Way (PROW). The payments for security were made to the Nigerian Army and Nigerian Police Force for security guards deployed to safeguard the pipelines.

Alternative Crude Oil Transport Cost- via Marine

These were costs, totalling \$327,022,954.07, incurred by NNPC to transport crude oil and refined products using vessels, due to the significant losses experienced through pipeline vandalism. The costs also cover manning and management of NNPC's storage vessels; MT Tuma and MT Olobiri, and other throughput expenses. The detailed breakdown of the cost is listed below;

- a) Charter Hire/Product distribution: charter of vessels loaded with refined products, during the review period
- b) NACJ/SPM Repair: Rehabilitation, operation and maintenance of damaged sections of New Atlas cove jetty facilities and Single Point Mooring (SPM) Cantenary Anchor Leg Mooring (CALM) Buoy, during the review period.
- c) NIMASA: Outstanding 2% cabotage fees (deducted at source) of the contract sum of coastal trades performed by MT Tuma and MT Olobiri. Cabotage involves carriage of cargo between two points within a country by a vessel registered in another country. The Coastal and Inland Shipping (Cabotage) Act was established in 2003 to restrict the use of foreign vessels in domestic coastal trade thereby promoting the development of indigenous ship acquisition capacity and providing financial assistance to Nigerian operators in domestic coastal shipping. The Act reserves the commercial transportation of goods and services within Nigerian coastal and inland waters to vessels built and registered in Nigeria, wholly owned and manned by Nigerians.
- d) MT Tuma and MT Olobiri: These are oil vessels owned by NNPC, used as haulage and storage facilities of excess crude oil and refined petroleum products when the NNPC storages tanks are fully utilized. Costs claimed relate to amounts incurred to sustain the full crew on board these vessels and the maintenance/repairs of the vessels.
- e) Crude Transport: Payments for crude oil transportation from Escravos terminals to Warri refinery Jetty, using marine vessels.
- f) Marine /Throughput bills: bills paid by NNPC to tank farm owners to utilise their tank farm.

The total amount claimed during the review period was \$327,022,954.07.

Environmental remediation & Community cost

These costs were requested by PPMC for special funding to pay out of court settlements/ indebtedness to Industrial Trust Fund (ITF) and also some outstanding third party liability⁷³.

The total amount claimed during the review period was \$10,899,421.83.

Capital Expenditure – CAPEX

NNPC claimed the sum of \$123,252,435.75 as money spent on maintaining, repairing and revamping its depot facilities.

⁷³ Sources: PPMC Internal brief to NNPC on the Out-of-Court settlement, NNPC Submissions.

Supporting documents provided were copies of certificate awards, payment certificate and NNPC's internal vouchers.

4.6.2. Procedures Performed

The various procedures performed are as follows:

1. Reviewed NNPC's submissions during the Senate Hearings on pipeline maintenance and management cost.
2. Checked the arithmetical accuracy of the figures contained in NNPC's submissions.
3. Reviewed the report of the two consultants (Sada Idris & Co and Ayorinde Osomo & Co) appointed by the Senate Committee, to audit and give their professional opinion on these costs.
4. Checked the claims with the provided supporting documents to highlight any discrepancies.
5. Documented findings and conclusions.

4.6.3. Limitations

- Unsubstantiated claims: We were not provided with support documents for some items of expenditure categorized under the pipeline maintenance and management cost.

4.6.4. Key Findings

4.6.4.1. Approximation error of \$4.68m

NNPC's actual claim for Pipeline Maintenance and Management cost was \$905,318,411.32, which was approximated to \$910million, thereby, creating a difference of \$4,681,588.68⁷⁴.

4.6.4.2. Unsubstantiated Cost of \$305.89m

The sum of \$305,885,083.77, could not be substantiated due to a lack of or insufficient supporting documents and duplication of entries.

⁷⁴ Breakdown of NNPC's Claim submitted during the Senate Hearing. Breakdown obtained from NNPC. GM Finance's office

S/N	Category	Further cost breakdown	(\$)
1	Salaries and Upfront benefits (PPMC's Cost)	N/A	54,678,942.11
2	Pipeline Vandalism Repair Cost	N/A	11,896,654.70
3	Pipeline Surveillance payments	N/A	48,238,152.14
4		Charter Hire Payments	59,324,737.01
5		Facility Management Expenses	15,774,478.66
7	Alternative Crude Oil Transport Cost –via Marine	MT Tuma and MT Olobiri Payments	6,658,588.74
8		Crude Transport Payments	5,457,006.98
9		Marine and Throughput payments	6,707,826.05
10	Environmental Remediation Payments		10,257,161.07
11	Capital Expenditure (CAPEX)		27,179,005.48
12	PPMC Charge Out Fees for Management Services		59,712,530.83
TOTAL			305,885,083.77

Table F1 – Summary of unsubstantiated payments

The details of the above unsubstantiated costs have been summarized as follows:

Salaries and Upfront benefits (PPMC's Cost)

- i. Unavailable supporting documents**
Upon review of the provided documents, we discovered that there was no supporting document available for three (3) different salary payments in January 2012, March 2012, and November 2012 . See Table 1.2 below for further details.
- ii. Duplication of entry**
We observed that there was a duplicated entry of ₦4,883,255,198.59 (\$31,551,690.59) in January 2013. The supporting document provided was that for January 2012, which had already been claimed.
- iii. Operational Cost/ Status Cars**
Operational cost of ₦405,760,000 (\$2,622,883.00) was included in PPMC's salaries in May 2012. No supporting documents were provided for these costs. See summary in Table F2 below;

Date	No supporting documents (N)	Duplications (N)	Operational Cost (N)	TOTAL (N)	TOTAL (\$)
Jan-12	933,270,000			933,270,000	5,994,027
Mar-12	1,340,970,000			1,340,970,000	8,648,072
May-12			405,760,000	405,760,000	2,622,883
Nov-12	906,019,406			906,019,406	5,855,108
Jan-13		4,883,255,198		4,883,255,198	31,558,852
TOTAL	3,180,259,406	4,883,255,198	405,760,000	8,469,274,605	54,678,942

Table F2 – Summary of Unsupported Operational Costs ⁷⁵

Pipeline Surveillance payments

The sum of \$3,324,391.39 was verified as pipeline security cost paid to Nigerian Army and Nigerian Police. However, the sum of \$48,238,152.14 for Right of Way and other pipeline security cost could not be substantiated.

Charter Hire

A total of \$59,324,737.01 on Charter Hire Services could not be substantiated due to lack of supporting document.

NACJ/SPM Repair

The sum of \$15,774,478.66 could not be substantiated due to lack of supporting document (i.e. invoices)

Supporting documents provided for the substantiated balance of \$28,324,411.49 were third party payment certificates from Julius Berger, NNPC internal memo, extract of PPMC request memo to GMD for approval of payment to Julius Berger.

MT Tuma and MT Olobiri

Out of the \$17,767,683.54 claimed as payments for manning and management fee of MT Tuma and MT Olobiri, the sum of 6,658,588.74 could not be substantiated due to lack of supporting documents.

The supporting documents provided for the substantiated balance were copies of invoices from J Marine Logistics Limited, NNPC's internal vouchers and NNPC's payment vouchers.

⁷⁵ Sources: NNPC Submission during the Senate Hearing, CBN Monthly average rate

Crude Transport Payments

The total claim of \$5,457,006.98 out of the total claim \$46,265,215.13 could not be substantiated due to lack of supporting documents. NNPC claimed the sum of \$46,265,215.13 as crude transport payments during the review period, which was incurred on crude oil transportation from Escravos terminals to Warri refinery jetty using marine vessels. The supporting documents provided were third party invoices for the service rendered, NNPC Payment vouchers and NNPC Remittance advices.

Marine throughput

The sum of \$6,707,826.05 could not be substantiated due to lack of supporting document.

Environmental Remediation

The following claims, totalling \$10,257,161.07 could not be substantiated due to insufficient documents:

1. ₦442,975,320 (\$2,846,296.53) payment in February 2012
2. ₦1,146,831,287.12 (\$7,410,864.54) payment to settle PPMC's outstanding third party liability in May 2013

Capital Expenditure – CAPEX

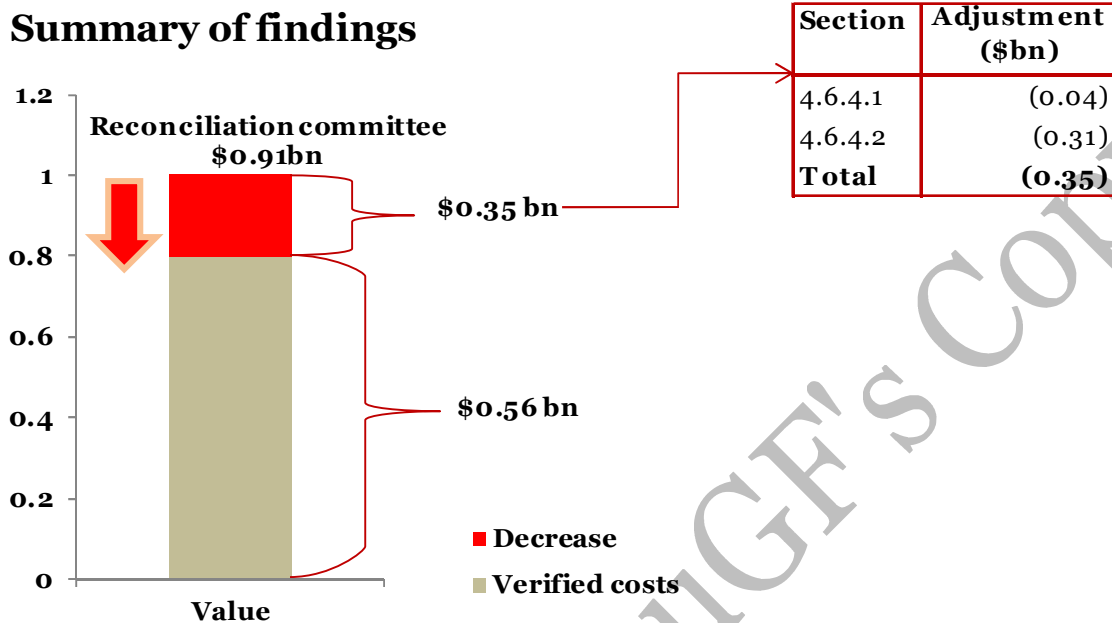
The sum of \$27,179,005.48 could not be substantiated due to insufficient supporting documents.

The total amount verified as Capital expenditure was \$96,073,430.27.

Others

No amount has been substantiated for the total claim on Pipeline Vandalism and Repair Cost of \$11,896,654.71 and on Management Charge out Rate claim of \$59,712,530.83. We were not provided with supporting documents for the costs.

4.6.5. Summary of Findings



NNPC claimed that the sum of \$905,318,411.32 (approximated to \$910million) was spent on Pipeline Maintenance and Management payments during the review period. These payments included PPMC's administration cost such as salary payments, indebtedness paid on behalf of their subsidiary, PPMC, capital expenditures, pipelines and facilities management etc. as explained in the findings above.

The sum of \$44,415,284.67 was found as a casting error in the schedule provided containing a summary of the claims.

Description	Amount (\$)
Actual Amount Claimed	905,318,411.32
Difference due Approximation /Rounding up	4,681,588.68
	910,000,000.00
Casting error/ Arithmetical Inaccuracy	44,415,284.68
Unsubstantiated Costs	305,885,083.77
Substantiated Costs	555,018,042.87
	905,318,411.32

From our analysis of the supporting documents provided by NNPC, the sum of \$555,018,042.87 could be substantiated using third party confirmation documents such as invoices and other documents provided. We were however unable to verify \$305,885,083.77 due to exceptions such as casting errors/arithmetical inaccuracies, duplications of payments, insufficient/no supporting third party documents, wrong classification/inclusion of costs etc.

4.6.6. Subsequent information after submission of draft report

After the submission of our initial report to the Auditor-General of the Federation on 28 November 2014, the following was brought to our attention by NNPC regarding Pipeline Maintenance and Management Costs:

- Initial submission made to the Senate Committee was understated and did not include all the costs defrayed from the proceeds of domestic crude revenue by NNPC in accordance with the NNPC Act. These costs also largely include the amounts incurred by the Corporation's subsidiaries.
- Initial submission included costs incurred between January to March 2012 which could not have been deducted from revenues from domestic crude oil liftings between January 2012 to July 2013. The new information has therefore included costs covering April 2012 to October July 2013.
- The table below summarizes the comprehensive cost information provided by NNPC as incurred between April 2012 and October 2013 (the period when the associated revenues from January 2012 to July 2013 crude liftings would have been received).

Comprehensive NNPC costs between April 2012 - October 2013

Expense type	Total (\$)
Salaries and benefits	1,522,258,663
Monthly operations	478,684,782
Other third party payments (including training course fees, estacodes, and consultancy fees)	955,212,837
Total costs	2,811,153,197

- We confirmed these additional costs received to the group's accounting platform on SAP.

4.7. Crude and Products Losses

4.7.1. Introduction

NNPC accounted for \$0.76billion as crude oil and refined product losses incurred due to pipeline vandalism and crude oil theft. These losses were claimed to have been incurred during pipeline transfers of crude oil lifted from terminals to refineries for processing, and the subsequent transfers of refined products from refineries to depots and/or inter-depot transfers.

NNPC categorized the crude and refined product losses as thus:

Crude oil losses: Losses suffered by NNPC along pipeline systems in its efforts to supply crude oil to refineries. The losses were determined as differences (in barrels) between the crude oil pumped at the terminals and the crude oil received by the refineries. Crude oil is transferred from the following pipeline networks.

- Chevron Escravos to WRPC
- WRPC to KRPC
- NPDC to WRPC and
- Bonny to PHRC

Refined Product losses: These were described as losses suffered along pipeline systems in the process of transferring refined petroleum products/white products (PMS, DPK or AGO) from refineries to depot or from inter depot transfers. They were accounted for as the differences between quantity transferred (in litres) and quantity received, during the review period.

NNPC broke down the losses as follows:

Description	Amount (\$)
Crude Oil Losses	465,809,647.05
Refined Product Losses	296,047,770.15
Total	761,857,417.20

Table G1 – Summary of Product Losses between Jan 2012 and July 2013

We reviewed and analysed the losses claimed by NNPC, assessed the reasonableness of the claims, and examined support documents provided.

Key stakeholders in crude/refined product distribution process

There are currently four (4) refineries owned by NNPC in Nigeria located in Port Harcourt, Warri and Kaduna. In addition there is a network of pipelines and depots strategically located throughout Nigeria linking these refineries.

Below are the key stakeholders with their roles and responsibilities in the distribution of crude oil from terminals to refineries and from refineries to depots or inter depot transfers;

I. Pipeline and Products Marketing Company “PPMC”

NNPC through its fully owned subsidiary, PPMC, supplies only to bulk customers in order to meet the needs for petroleum products and ensure the availability across the country.

PPMC is the product distribution arm of NNPC and is directly responsible for the distribution of petroleum products. Petroleum products either imported or refined locally are received by PPMC through pipelines and import jetties and further distributed to depots through pipelines.

II. Department of Petroleum Resources “DPR”

DPR is the petroleum agency of Nigeria that regulates the pipeline network and supervises all petroleum industry operations carried out under licenses and leases in the country. One of its major functions is to keep and update records on petroleum industry operations, particularly on matters relating to petroleum reserves, production and exports of crude oil, gas and condensate, licenses and leases as well as rendering regular reports on them to Government. DPR is expected to keep records of the quantities of crude oil pumped at the terminals and quantities imported or delivered to refineries for processing.

III. Independent Surveyors

These are inspection agencies which are usually appointed by the buyer/ marketer to inspect the quantity and quality of the product being pumped and transferred to the refineries. Examples of Inspection agencies used are SGS Inspection Agency, General Marine & Oil Services (GMO) Ltd, Konsult Control Services (KCS) and Marine Technical Services International (Nig.) Ltd (MTSI).

4.7.2. Procedures Performed/ Work Done

- Obtained and reviewed NNPC’s submissions during Senate Hearing on crude oil and refined product losses to understand the claims made.
- Held a discussion with the Executive Director of Operations “EDO” and Executive Director Commercial “EDC” of PPMC to gain understanding of PPMC’s operations and pipeline network.
- Obtained and reviewed the schedule of both crude oil and product losses.
- Reviewed the schedule provided to supporting documents from the Independent surveyors, to ascertain the reasonableness of the claim. Highlighted all discrepancies.
- Identified the various volume pumped from terminals and volumes received at the respective refinery. Identified discrepancies and obtained clarification where necessary.
- Obtained the pricing template of the refined product to determine the appropriate rate to value the refined product losses.
- Obtained the monthly average Platt prices to determine the appropriate rate to value the crude oil losses.
- Conducted interviews with relevant process owners to validate understanding of deductions in the period under review.
- Documented findings and conclusions.

4.7.3. Limitations

There were no independent support documents to verify the correctness of the quantities for the refined product losses. The documents used were monthly reconciliation reports of the different PPMC’s operations centers.

4.7.4. Findings

4.7.4.1. Crude Oil Losses

777,034m³ of Crude Oil lost during the review period

Using the Independent Surveyors Report as third party confirmation, it was found that 777,034 cubic meter (over 4.9million barrels) of crude oil allocated to domestic refineries was lost to theft within the review period.

Year	Pipeline	Volume pumped(m ³)	Volume received(m ³)	Loss/ Difference (m ³)
Jan2012 – Dec 2012	Chevron Escravos to WRPC			
		1,333,646	1,126,286	(207,360)
	WRPC to KRPC	1,962,557	1,806,784	(155,773)
	SPDC to WRPC	392,000	384,386	(7,614)
Jan 2013 – July 2013	Bonny to PHRC	1,629,534	1,490,906	(138,628)
	Chevron Escravos to WRPC			
		756,983	637,525	(119,458)
	WRPC to KRPC	1,028,210	989,840	(38,370)
	SPDC to WRPC			
		424,363	408,749	(15,614)
	Bonny to PHRC	978,152	883,935	(94,217)
				(777,034)

Table G2: Crude Oil Loss between January 2012 and July 2013

Non-measurement of crude oil lost between oil wells and terminals in the country

The Crude oil analysis above only relates to crude oil movement from the terminals to the refineries for domestic production. The country's production capacity is over 2 million barrels of crude oil per day which is measured at the terminals. The records do not show the actual crude oil production per day from the oil wells which will reflect the country's actual crude oil production.

Identified discrepancies between Independent Surveyors' Report and schedule provided by NNPC

We observed some discrepancies between some quantities of crude oil losses stated in the schedule provided by NNPC and that stated on the related Independent Surveyors reports which were provided as support documents. The difference amounted to 328,667 barrels higher than NNPC figures in 2012 and 71,907 barrels lower than the NNPC figures from January to July 2013. The tables below clearly show the discrepancies;

2012	Pumped m³	Received m³	Variance m³	Variance (bbls)
NNPC's Figures	5,313,158	4,847,425	(465,733)	(2,929,364)
Independent Surveyor's Report	5,317,737	4,808,362	(509,375)	(3,258,031)
Difference	(4,579)	39,063	43,642	328,667

Table G3 – Comparison of Variances in Crude Oil Losses in 2012

2013	Pumped m³	Received m³	Variance m³	Variance (bbls)
Independent Surveyor's Report	3,265,874	2,991,025	(274,849)	(1,728,732)
Schedule from NNPC	3,187,708	2,920,049	(267,659)	(1,657,025)
Difference	78,166	70,976	(7,190)	(71,707)

Table G4 – Comparison of variances in crude oil losses in 2013

Valuation of Crude Oil loss

NNPC applied a conversion rate of \$100/barrel to value the crude oil difference between the quantity pumped and quantity received at the refineries. We adopted the monthly average Platts price, given that the revenue generated from crude oil lifted during the review period was accounted for using Platts price and the pricing options depending on the contract.

It will be unrealistic to adopt a parallel conversion rate of \$100 per barrel to value the quantities of crude lost during oil movements/transfers. Applying the monthly average Platts price to value the crude oil losses amounted to \$73,851,144.93 higher than PPMC's valuation, as shown in table below;

Conversion Rate	Amount \$
Using \$100/ barrel	(292,936,421.68)
Using Monthly average of Platts price	(358,804,942.37)
Difference: 2012	65,868,520.69
Using \$100/ barrel	(172,873,241.00)
Using Monthly average of Platts price	(180,855,865.24)
Difference: 2013	7,982,624.24
2012 + 2013	73,851,144.93

Table G5 – Valuation of Crude Oil Losses

4.7.4.2. Refined product losses

4.7.4.2.1. Non availability of third party report to confirm the correctness of the quantities stated as Inter-depot transfers

There was no third party report to confirm the correctness of the quantities stated as Inter-depot transfers through the pipelines. We could not use DPR data because the records only discloses the total product received which included data from different channels (pipeline, tanks and /or vessels) without disaggregating the data per channel. The data also shows the total litres of products processed and produced by the refinery on a monthly basis but did not provide quantities of refined product piped by the refineries to the depots.

We therefore relied on the monthly oil movement and quality control reports from NNPC's operation areas showing the status of the pipeline, downtime, depot balances and quantities delivered through pipelines.

4.7.4.2.2. 503,372 litres of refined petroleum products (PMS/DPK/AGO) lost during the review period

Using the monthly Oil movement and quality control report submitted by the various PPMC operation areas, it was found that a total of 503,372 litres of refined product was lost during the storage and distribution of refined petroleum products (PMS, DPK and AGO) within the review period. The loss was 152 litres higher than NNPC's reported loss of 503,220 litres within the review period.

	Pipelines	PMS (Litres)	DPK (Litres)	AGO (Litres)	Total (Litres)
1	Atlas Cove Depot to Mosimi Idimu-Satellite Pipeline	245,440	-	5,609	251,049
2	Mosimi to Ibadan Pipeline	103,107	-	-	103,107
3	Mosimi to Satellite Pipeline	-	-	-	-
4	Ibadan to Ilorin Pipeline	25,948	-	-	25,948
5	Mosimi to Ore Pipeline	36,923	-	-	36,923
6	Kaduna to Kano Pipeline	(1,507)	-	6,820	5,313
7	Kaduna to Suleja Pipeline	15,243	-	8,059	23,302
8	Kaduna to Jos Pipeline	3,726	-	10,168	13,894
9	Kaduna to Gusau Pipeline	1,768	-	-	1,768
10	Suleja to Minna Pipeline	4,883	-	2,993	7,876
11	Jos to Gombe Pipeline	7,021	-	9,132	16,153
12	Port Harcourt to Aba Pipeline	3,400	1417	3,991	8,808
13	Warri to Benin Pipeline	7,466	893	872	9,231
	TOTAL	453,418	2,310	47,644	503,372

Table G6 – Summary of Refined Products Losses

4.7.4.2.3. Valuation of product losses using Ex-depot price

NNPC adopted the ex-depot price (per litre) for refined petroleum products to value the product losses during the review period. The conversion rates used were;

- PMS at ₦87.66/litre
- DPK- ₦40.9/litre and;
- AGO at ₦126/ litre

The Ex-Depot price is the selling price for petroleum products at the depots nationwide plus other unavoidable charges such as the bridging funds, marine transport agent cost and administration cost (depending on the product), as shown in the table below;

Product	PPPRA Ex-depot price	NNPC Price	Other charges	Ex-Depot Price used by PwC	Remarks
PMS	₦81.51/litre	₦87.66/litre	Bridging fund ₦5.85/litre	₦87.66	
			Marine Transport Average (MTA) ₦0.15/litre		
			Administrative charge ₦0.15/litre		
DPK	₦34.51/litre	₦40.9/litre	Bridging fund ₦5.85/litre	₦40.66	Yet to account for ₦0.24 used by NNPC to arrive at ₦40.9/litre
			Marine Transport Average (MTA) ₦0.15/litre		
			Administrative charge ₦0.15/litre		
AGO	N/A	₦126/litre	N/A	₦126/litre	N/A

Table G7 – Product Losses Unit cost Valuation

We also adopted the ex-depot price, considering that it would ordinarily be the price at which NNPC would have received petroleum products from the marketers after all unavoidable charges have been paid, if the petroleum products were not lost in transit. This implies that NNPC can still claim Subsidy from the total refined petroleum products including that for the product losses.

However it was observed that NNPC valued the lost DPK at ₦40.9/Litre, which is yet to be explained as shown in the table above. The components of the cost are the official selling price at ₦34.51/litre and other unavoidable charges (Bridging fund, Marine Transport Average and Administrative charges) at ₦6.15/litre, thereby summing up to ₦40.66/litre and not ₦40.9/litre used. We used ₦40.66/Litre for our valuation which led to a difference of ₦11,249.

4.7.4.2.4. Refined product losses: Casting errors and arithmetical inaccuracy

There were no third party supporting documents for the difference in quantities for the refined petroleum product losses. Using the monthly reports from NNPC operation area for January to

December 2012, the total quantity lost was 231 litres (valued at \$97,037) lower than the quantities stated on NNPC's schedule.

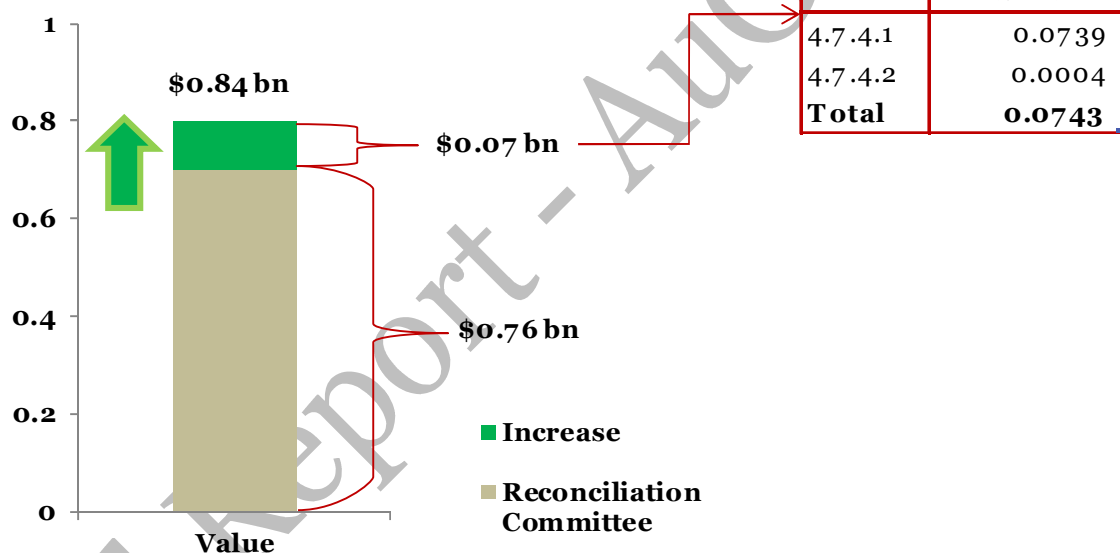
For January to July 2013, there were arithmetical errors in the schedule for PMS losses, as provided by NNPC. The casting of the schedule was ₦9,616,927 (\$54,713) higher than the amount on the schedule provided.

Period	Variance in Volumes(litres)	Variance in Value \$
January to December 2012	231	97,037.33
January to July 2013	0	(54,713.44)
		42,323.89

Table G8 – Casting errors noted on PPMC's schedule of refined product losses

4.7.5. Summary of findings

Summary of findings



NNPC claimed the sum of \$760million for crude oil and refined product losses. The losses were described as differences between the quantities of crude oil pumped at the terminals and received at the refineries and/or depots, and the difference between the quantities delivered and received after inter-depot transfers due to pipeline vandalism, spillage, low pressure pump etc.

Our expected value of the losses is \$73,893,468.82 higher than the NNPC's submission

DESCRIPTION	NNPC's Submission	PwC Figures	Variance \$
Crude Oil Losses	(465,809,662.68)	(539,660,807.61)	73,851,144.93
Product Losses	(296,047,770.17)	(296,090,094.05)	42,323.89
TOTAL	(761,857,432.85)	(835,750,901.66)	73,893,468.82

Table G8 – Summary of balances of Crude and Product Losses

4.8. Holding Cost of Strategic Reserve

4.8.1. Introduction

The sum of \$459,985,849 (which was approximated to \$0.46billion during the Senate Hearing) was stated to have been incurred as holding cost of strategic reserves between January 2012 and July 2013. The components of the holding costs were demurrage costs of \$207,892,239 and NPA Charges of \$252,093,610.

Cost	Amount \$
Demurrage Cost	207,892,239
NPA Charges	252,093,610
TOTAL	459,985,849

Table H1 – Holding Cost of Strategic Reserve

The Demurrage costs are claims made by oil traders for the extra days spent (outside the agreed delivery period) by their nominated vessels when delivering refined products to NNPC. Our discussions with PPMC revealed that NNPC, due to the limited capacity of reserve tanks and the need to ensure sufficient reserve of petroleum resources in the country, makes use of vessels as temporary storage facilities. The oil traders compute demurrage based on agreed rates and submit such claims to PPMC. A reconciliation meeting is then held periodically with PPMC to agree on PPMC's demurrage obligation to the traders.

We were also informed by PPMC that since the traders are part of existing OPA and Product Exchange contracts with NNPC, demurrage claims are sometimes not settled in cash, but are settled in kind through future supply of refined products by the trader.

The NPA Charges are fees paid by vessels anchoring at the various ports in Nigeria.

4.8.2. Procedures Performed/Work done

- Obtained and reviewed the schedule showing the breakdown of the claims.
- Requested for the supporting documents for the claims.
- Held discussions with PPMC, and Group Treasury Department of NNPC to obtain information.

4.8.3. Limitation

- Neither PPMC nor NNPC provided any support for NPA charges classified as part of the Holding Costs of Strategic Reserves.

4.8.4. Key Findings

4.8.4.1. \$64.8 million of Demurrage costs could not be verified

After the submission of our initial report to the Auditor-General of the Federation on 28 November 2014, the following was brought to our attention by NNPC regarding Demurrage claims:

- Only Demurrage claims by traders involved in Swap arrangements result in a direct reduction in value from the refined products supplied by the traders. Such claims therefore account for the reduction in expected domestic crude revenue remittance. We were provided with the latest reconciled demurrage position agreed between NNPC/PPMC and the oil traders which would have reduced the value of refined products supplied by the traders. The total claim by the 4 oil traders affected relating to January 2012 - July 2013 liftings amounted to \$143million. This is summarized in Table H3 below.

Oil trader	Total (\$)
Trafigura	47,943,908
Ontario	32,736,577
Aiteo	24,241,094
Taleveras	38,213,408
Total costs	143,134,988

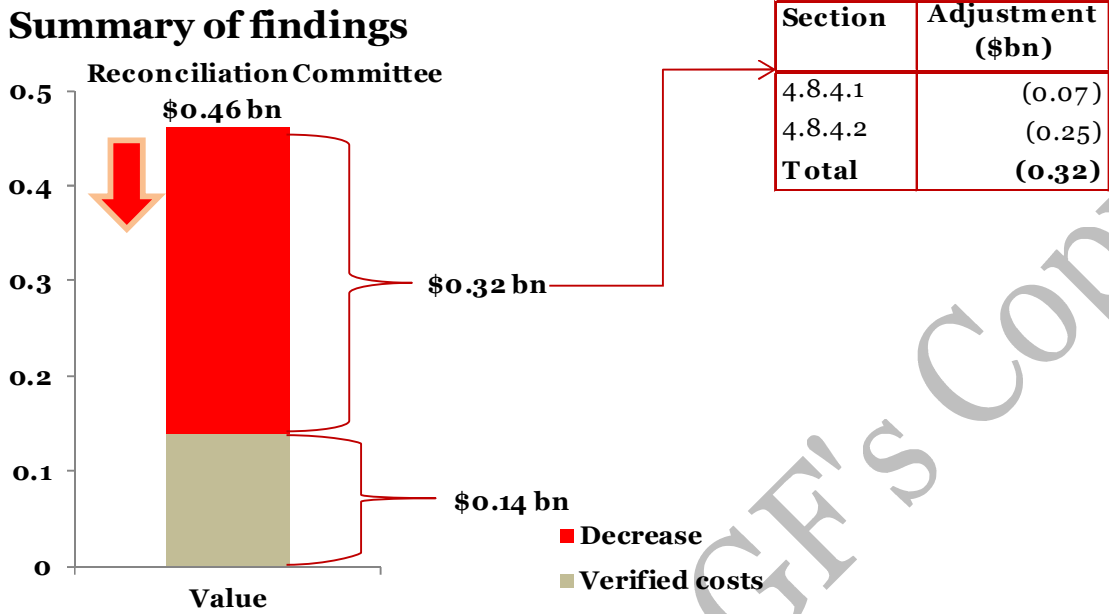
Table H3: Demurrage claims on crude lifted under swap contracts between January 2012 - July 2013

- Demurrage claims by SIR (the oil trader involved in Offshore Processing Arrangement with NNPC/PPMC) are invoiced and settled by cash. We were informed by NNPC that due to certain contract disagreements, none of the claims were settled during the period under review. Amounts relating to SIR have therefore been excluded from the explanations for unremitted crude oil revenue.

4.8.4.2. Unsubstantiated \$0.25billion NPA Charges claim

No supporting documents were provided for the \$0.25billion claimed as NPA Charges.

4.8.5. Summary of findings



5. Glossary of terms

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Term	Definition
AENR	Agip Energy and Natural Resources Company
AGO	Automotive Gas Oil
BBL	Barrels
BPD	Barrels per day
CA	Carry Arrangements
CAPEX	Capital Expenditures
CBN	Central Bank of Nigeria
CIF	Cost, Insurance & Freight
COMD	Crude Oil Marketing Division
COSM	Crude Oil Stock Management
DPK	Dual Purpose Kerosene
DPR	Department of Petroleum Resources
E&P	Exploration and Production
FAAC	Federation Accounts Allocation Committee
FGN	Federal Government of Nigeria
FOB	Free on Board
IOC	International Oil Company
JV	Joint Venture
JVCC	Joint Venture Cash Calls
KRPC	Kaduna Refinery and Petrochemicals Company
LC	Letter of Credit
LPFO	Low Pour Fuel Oil
MCA	Modified Carry Arrangements
MPN	Mobil Producing Nigeria Unlimited
MV	Mother Vessel (The vessel contracted by buyers to move petroleum products purchased from the seller or the Port of Loading)
NACJ	New Atlas Cove Jetty
NAPIMS	National Petroleum Investment Management Service
NGN	Nigerian Naira

Term	Definition
NNPC	Nigerian National Petroleum Corporation
NPA	Nigerian Ports Authority
NPDC	Nigerian Petroleum Development Company
OML	Oil Mining License
OPL	Oil Prospecting License
OSP	Official Selling Price
PIA	Pre-Shipment Inspection Agents
OTPF	Other Third Party Financing
PMS	Premium Motor Spirit
PPMC	Petroleum Products Marketing Company
PPPRA	Petroleum Products Pricing Regulatory Agency
PPT	Petroleum Profit Tax
PRPC	Port Harcourt Refinery and Petrochemicals Company
PSC	Production Sharing Contract
PwC	PricewaterhouseCoopers
PSF	Petroleum Support Fund
RDP	Reserve Development Project
Reconciliation Committee	<p>Technical team set under the leadership of the Ministry of Finance to reconcile the various revenue and remittance figures and allegations in December 2013. The Committee had representatives from:</p> <ul style="list-style-type: none"> (i) CBN (ii) NNPC (iii) Department of Petroleum Resources (DPR) (iv) Federal Inland Revenue Service (FIRS) (v) Office of the Accountant General of the Federation (OAGF) (vi) The Budget Office of the Federation (vii) Federal Ministry of Finance (viii) Federal Ministry of Petroleum Resources <p>In the end, the Committee agreed the unremitted balance from NNPC (due from proceeds of domestic crude sale) to be \$10.8 billion</p>
SFDP	Satellite Field Development Project
Shore Outturn	The volume of petroleum products verified by inspectors as discharged into the shore tanks
Senate Committee	Senate Committee on Finance headed by Senator Ahmed Makarfi to which the matter of alleged non-remittance of \$49.8 billion to the Federation Account by the NNPC was referred to by the Senate at its sitting on 11 December 2013.
SPDC	Shell Petroleum Development Company

Term	Definition
SPV	Special Purpose Vehicle
STS	Shuttle to Shuttle (Transfer of products from one vessel to another)
SV	Shuttle Vessel (A vessel that receives petroleum products offshore Nigeria from the mother vessel, and delivers to another SV or to the port of discharge e.g. Lagos)
TEPNG	Total Exploration and Producing Nigeria Limited
USD	United States Dollar
WRPC	Warri Refinery and Petrochemicals Company

6. Appendices and Exhibits

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6.1. Appendices

6.1.1. Valuation of Crude Oil Revenue

Customer	B/L Date	Crude Type	Quantity Lifted COMD (Bbls)	Unit Price COMD (\$)	Expected Price (PwC) (\$)	COMD Valuation (\$)	PwC valuation (\$)
EQUITY							
ETERNA	1/7/2012	AKPO	996,755	109.888	109.888	109,531,413.44	109,531,413.44
ELAN OIL	1/8/2012	ERHA	997,467	114.678	114.678	114,387,520.63	114,387,520.63
AMG	1/12/2012	QIL	950,245	111.379	111.379	105,837,337.86	105,837,337.86
SOCAR	1/15/2012	AGBAMI	974,728	109.647	109.647	106,876,001.02	106,876,001.02
CENTO	1/18/2012	QIL	950,122	111.330	111.330	105,777,082.26	105,777,082.26
ENERGY TRADING SA	1/20/2012	AMENAN	949,623	111.15	111.148	105,548,414.46	105,548,414.46
MASTERS ENERGY	1/24/2012	BB	249,961	112.245	112.245	28,056,872.45	28,056,872.45
ERG	1/28/2012	ESL	848,951	111.547	111.547	94,697,937.20	94,697,937.20
GLENCORE	1/28/2012	FB	906,214	114.611	114.611	103,862,092.75	103,862,092.75
DUKE OIL	2/15/2012	FB	114,600	125.485	125.485	14,380,581.00	14,380,581.00
DUKE OIL	2/15/2012	FB	171,900	125.485	125.485	21,570,871.50	21,570,871.50
AZENITH	2/16/2012	AMB	902,926	121.426	121.426	109,638,692.48	109,638,692.48
SARB ENERGY	2/18/2012	EA	629,406	122.951	122.951	77,386,097.11	77,386,097.11
VITOL	2/18/2012	BL	949,861	124.051	124.051	117,831,206.91	117,831,206.91
CALSON	2/19/2012	ESL	949,014	122.651	122.651	116,397,516.11	116,397,516.11
ADDAX	2/21/2012	BB	649,799	127.353	127.353	82,753,852.05	82,753,852.05
SOCAR	2/22/2012	ESL	842,900	123.620	123.620	104,199,298.00	104,199,298.00
ADDAX	2/24/2012	BB	299,721	127.804	127.804	38,305,542.68	38,305,542.68
SAHARA	2/26/2012	BONGA	30,000	128.104	128.104	3,843,120.00	3,843,120.00
SARB ENERGY	3/4/2012	BL	305,600	128.987	128.987	39,418,427.20	39,418,427.20
MERCURIA	3/12/2012	AMB	949,769	126.248	126.248	119,906,436.71	119,906,436.71
SAHARA	3/17/2012	FB	83,227	128.066	128.066	10,658,548.98	10,658,548.98
ENERGY NETWORK	3/24/2012	BL	285,202	126.194	126.194	35,990,781.19	35,990,781.19
ENERGY NETWORK	3/24/2012	BL	617,937	127.058	127.058	78,513,839.35	78,513,839.35
HAVISTAR	3/26/2012	FB	285,452	128.066	128.066	36,556,695.83	36,556,695.83
OCEANBED	3/26/2012	ZAFIRO	947,125	116.301	125.816	110,151,584.63	119,163,479.00
INDIAN OIL	3/27/2012	ESL	834,561	123.993	123.993	103,479,722.07	103,479,722.07
MERCURIA	3/28/2012	QIL	949,927	123.741	123.741	117,544,916.91	117,544,916.91
DUKE OIL	3/29/2012	FB	524,254	127.832	127.832	67,016,437.33	67,016,437.33

Investigative Forensic audit of crude oil revenues and remittances by NNPC (January 2012 – July 2013)

VITOL	3/30/2012	EA	906,236	123.035	123.035	111,498,746.26	111,498,746.26
TRAFIGURA	3/31/2012	ERHA	995,906	126.594	126.594	126,075,724.16	126,075,724.16
SAHARA	4/13/2012	FB	432,943	121.018	121.018	52,393,895.97	52,393,895.97
FUJAIRAH REFINERY	4/14/2012	PL	992,051	121.218	122.030	120,254,438.12	121,059,983.53
MASTERS ENERGY	4/17/2012	BL	949,173	119.412	119.412	113,342,646.28	113,342,646.28
OCTOGONE INT'L GAS	4/21/2012	QIL	950,194	120.480	120.480	114,479,373.12	114,479,373.12
VERMONT	4/25/2012	ESC	844,721	119.212	119.212	100,700,879.85	100,700,879.85
ZAMBIA (SARB)	4/26/2012	BB	299,860	120.635	120.635	36,173,611.10	36,173,611.10
AMG	4/27/2012	BL	947,775	119.244	119.244	113,016,482.10	113,016,482.10
SAHARA	4/29/2012	FB	114,600	120.594	120.594	13,820,072.40	13,820,072.40
OCEAN BED	4/29/2012	FB	285,505	115.876	115.876	33,083,177.38	33,083,177.38
SOCAR TRADING	5/3/2012	AMB	949,373	111.992	111.992	106,322,181.02	106,322,181.02
VALESKA TANKERS	5/9/2012	QIL	950,000	114.276	114.276	108,562,200.00	108,562,200.00
MASTERS ENERGY	5/13/2012	BB	911,497	110.815	110.815	101,007,540.06	101,007,540.06
OANDO	5/15/2012	YOHO	950,042	112.071	112.071	106,472,156.98	106,472,156.98
BRASKEM	5/21/2012	QIL	950,035	105.090	105.090	99,839,178.15	99,839,178.15
ERG	5/25/2012	ESL	896,148	100.901	100.901	90,422,229.35	90,422,229.35
HAVISTAR	5/25/2012	QIL	950,151	101.201	101.201	96,156,231.35	96,156,231.35
CALSON	5/27/2012	FB	949,097	102.551	102.551	97,330,846.45	97,330,846.45
ETERNA	6/3/2012	QIL	599,940	98.332	98.332	58,993,300.08	58,993,300.08
MERCURIA	6/6/2012	QIL	950,138	97.574	97.574	92,708,765.21	92,708,765.21
ETERNA	6/8/2012	QIL	350,415	99.043	99.043	34,706,152.85	34,706,152.85
FUJAIRAH REFINERY	6/9/2012	EA	948,911	95.654	95.654	90,767,132.79	90,767,132.79
CRUDEX	6/10/2012	AMB	949,573	98.243	98.243	93,288,900.24	93,288,900.24
SINOPEC	6/15/2012	BB	249,479	93.507	93.507	23,328,032.85	23,328,032.85
REP OF COTE D'IVOIRE	6/19/2012	BG	802,010	92.893	92.893	74,501,114.93	74,501,114.93
MERCURIA	6/21/2012	YOHO	950,372	92.431	92.431	87,843,834.33	87,843,834.33
VITOL	6/23/2012	ESL	860,827	94.554	94.554	81,394,636.16	81,394,636.16
DUKE OIL	6/28/2012	ESC	279,803	93.523	93.523	26,168,015.97	26,168,015.97
DUKE OIL	6/28/2012	FB	312,000	93.523	93.523	29,179,176.00	29,179,176.00
CALSON	6/28/2012	FB	947,379	92.023	92.023	87,180,657.72	87,180,657.72
GLENCORE	6/30/2012	BONGA	953,759	101.860	101.860	97,149,891.74	97,149,891.74
ERG	7/4/2012	QIL	247,420	96.561	96.561	23,891,122.62	23,891,122.62
SINOPEC	7/11/2012	BB	949,892	101.493	101.493	96,407,388.76	96,407,388.76
INDIAN OIL VORP	7/17/2012	QIL	950,096	106.821	106.821	101,490,204.82	101,490,204.82
PETRELOES DE GE	7/19/2012	BL	903,691	108.225	108.225	97,801,958.48	97,801,958.48
GUNVOR	7/20/2012	QIL	300,159	108.956	108.956	32,704,124.00	32,704,124.00

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DUKE OIL	7/23/2012	FB	33,591	111.015	111.015	3,729,104.87	3,729,104.87
VERMONT	7/23/2012	AMB	949,570	108.665	108.665	103,185,024.05	103,185,024.05
MASTERS	7/26/2012	ESL	898,964	106.687	106.687	95,907,772.27	95,907,772.27
DUKE OIL	7/27/2012	FB	150,000	115.601	115.601	17,340,150.00	17,340,150.00
DUKE OIL	7/27/2012	FB	316,700	115.601	115.601	36,610,836.70	36,610,836.70
SARB ENERGY	8/5/2012	BL	461,425	113.701	113.701	52,464,483.93	52,464,483.93
AZENITH	8/5/2012	QIL	949,251	113.701	113.701	107,930,787.95	107,930,787.95
CALSON	8/7/2012	QIL	997,690	109.165	109.165	108,912,828.85	108,912,828.85
OANDO	8/10/2012	BB	249,531	115.981	115.981	28,940,854.91	28,940,854.91
IBETO	8/17/2012	ANTAN	30,000	113.793	113.793	3,413,790.00	3,413,790.00
MERCURIA	8/18/2012	QIL	950,605	114.743	114.743	109,075,269.52	109,075,269.52
OCEAN BED TRADING	8/20/2012	ZAFIRO	995,723	105.596	115.181	105,144,365.91	114,688,370.86
SAHARA	8/22/2012	BONGA	439,513	115.447	115.447	50,740,457.31	50,740,457.31
CRUDEX	8/22/2012	BL	952,466	116.181	116.181	110,658,452.35	110,658,452.35
FUJAIIRA	8/24/2012	FB	934,379	115.337	115.337	107,768,470.72	107,768,470.72
DUKE OIL	8/24/2012	FB	98,492	116.637	116.637	11,487,811.40	11,487,811.40
DUKE OIL	8/24/2012	ESC	150,000	116.637	116.637	17,495,550.00	17,495,550.00
REP OF GHANA (TOR)	8/28/2012	FB	448,911	116.552	116.552	52,321,474.87	52,321,474.87
ASTANA ENERGY	9/3/2012	ANTAN	30,000	113.787	113.787	3,413,610.00	3,413,610.00
MONCLEAR LTD	9/7/2012	AKPO	30,000	108.171	108.171	3,245,130.00	3,245,130.00
DUKE	9/10/2012	QIL	250,101	111.371	111.371	27,853,998.47	27,853,998.47
FUJAIIRAH REFINERY	9/12/2012	BB	399,659	110.921	110.921	44,330,575.94	44,330,575.94
ONTARIO	9/14/2012	BG	30,000	112.000	112.000	3,360,000.00	3,360,000.00
SAHARA	9/15/2012	QIL	550,381	112.843	112.843	62,106,643.18	62,106,643.18
AMG PETROENERGY	9/18/2012	ERHA	30,000	111.388	111.388	3,341,640.00	3,341,640.00
OCEAN BED	9/21/2012	BL	278,128	111.300	111.300	30,955,646.40	30,955,646.40
DUKE OIL	9/22/2012	FB	90,000	114.055	114.055	10,264,950.00	10,264,950.00
DUKE OIL	9/22/2012	FB	426,237	114.055	114.055	48,614,461.04	48,614,461.04
MASTERS	9/23/2012	AGBAMI	30,000	108.500	108.500	3,255,000.00	3,255,000.00
VITOL	9/23/2012	QIL	950,548	111.300	111.300	105,795,992.40	105,795,992.40
SAHARA	9/26/2012	BL	30,000	111.488	111.488	3,344,640.00	3,344,640.00
REP OF GHANA (TOR)	9/26/2012	BONGA	600,327	112.462	112.462	67,513,975.07	67,513,975.07
ELAN OIL	9/27/2012	ESC	905,195	112.556	112.556	101,885,128.42	101,885,128.42
AITEO	10/4/2012	QIL	77,939	113.012	113.012	8,808,042.27	8,808,042.27
DK ENERGY	10/7/2012	BB	30,000	110.455	110.455	3,313,650.00	3,313,650.00
TOCOMO OIL	10/7/2012	AKPO	949,765	113.155	113.155	107,470,658.58	107,470,658.58
DUKE OIL	10/13/2012	QIL	950,438	109.873	109.873	104,427,474.37	104,427,474.37

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AVIDOR	10/14/2012	AGBAMI	30,000	107.173	107.173	3,215,190.00	3,215,190.00
AZENITH	10/15/2012	BG	30,000	110.233	110.233	3,306,990.00	3,306,990.00
CRUDEX OIL	10/17/2012	BONNY LIGHT	906,399	110.667	110.667	100,308,458.13	100,308,458.13
VOYAGE	10/19/2012	ANTAN	30,000	107.923	107.923	3,237,690.00	3,237,690.00
TRIDAX	10/19/2012	BONGA	30,000	110.970	110.970	3,329,100.00	3,329,100.00
CENTO ENERGY	10/19/2012	QIL	830,318	109.823	109.823	91,188,013.71	91,188,013.71
RHEINOIL	10/20/2012	BL	381,567	109.823	109.823	41,904,832.64	41,904,832.64
PETRO ENERGY	10/21/2012	BL	238,748	109.823	109.823	26,220,021.60	26,220,021.60
SOCAR	10/25/2012	ERHA	30,000	109.763	109.763	3,292,890.00	3,292,890.00
COTE D'IVOIRE	10/25/2012	BG	752,525	111.328	111.328	83,777,103.20	83,777,103.20
LENGARD PROJECT	10/27/2012	AGBAMI	30,000	107.049	107.049	3,211,470.00	3,211,470.00
ETERNA	11/5/2012	ERHA	30,000	111.044	111.044	3,331,320.00	3,331,320.00
DUKE OIL	11/5/2012	FB	114,600	112.279	112.279	12,867,173.40	12,867,173.40
DUKE OIL	11/5/2012	FB	466,453	112.279	112.279	52,372,876.39	52,372,876.39
DUKE OIL	11/9/2012	BONGA	952,552	112.756	112.756	107,405,953.31	107,405,953.31
PITT PUBLIC COMPANY	11/11/2012	AMB	949,583	111.356	111.356	105,741,764.55	105,741,764.55
HAVISTAR	11/13/2012	BRASS	30,000	111.094	111.094	3,332,820.00	3,332,820.00
TALEVERAS	11/13/2012	ERHA	549,800	110.694	110.694	60,859,561.20	60,859,561.20
INDIAN OIL	11/15/2012	QIL	905,003	110.401	110.401	99,913,236.20	99,913,236.20
LYNEAR	11/18/2012	BL	170,000	112.206	112.206	19,075,020.00	19,075,020.00
OCEAN BED	11/22/2012	BL	509,134	111.494	111.494	56,765,386.20	56,765,386.20
GLENORE	11/23/2012	USAN	997,719	108.162	108.162	107,915,282.48	107,915,282.48
SINOPEC	11/26/2012	QIL	695,704	110.348	110.348	76,769,544.99	76,769,544.99
REP OF BUKINA FASO	11/29/2012	QIL	905,076	110.361	110.361	99,885,092.44	99,885,092.44
OCEAN BED	11/30/2012	BL	440,317	110.873	110.873	48,819,266.74	48,819,266.74
SINOPEC	12/12/2012	PL	992,755	113.222	113.222	112,401,706.61	112,401,706.61
LYNEAR	12/16/2012	BL	40,000	111.974	111.974	4,478,960.00	4,478,960.00
DUKE OIL	12/18/2012	QIL	85,950	115.310	115.310	9,910,894.50	9,910,894.50
INDIA OIL	12/19/2012	ESC	745,746	111.372	111.372	83,055,223.51	83,055,223.51
REP OF LIBERIA	12/20/2012	OIL	997,421	111.722	111.722	111,433,868.96	111,433,868.96
CRUDEX	12/20/2012	BONGA	949,930	111.222	111.222	105,653,114.46	105,653,114.46
AITEO	12/22/2012	AMB	949,448	114.079	114.079	108,312,078.39	108,312,078.39
DUKE OIL	12/23/2012	QIL	949,978	114.979	114.979	109,227,520.46	109,227,520.46
AMG	12/26/2012	EL	100,000	111.711	111.711	11,171,100.00	11,171,100.00
LYNEAR	12/31/2012	EL	90,000	115.038	115.038	10,353,420.00	10,353,420.00
MASTERS	12/31/2012	QIL	949,738	111.372	111.372	105,774,220.54	105,774,220.54
PETROENERGY	¼/2013	BL	947,705	113.820	113.820	107,867,783.10	107,867,783.10

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REP OF MALAWI	¼/2013	OIL	949,922	113.791	113.791	108,092,574.30	108,092,574.30
SAHARA	1/7/2013	OIL	813,207	114.538	114.538	93,143,103.37	93,143,103.37
CALSON	1/11/2013	OIL	650,267	113.741	113.741	73,962,018.85	73,962,018.85
MERCURIA	1/13/2013	OIL	904,933	113.741	113.741	102,927,984.35	102,927,984.35
SAHARA	1/15/2013	BL	160,000	114.276	114.276	18,284,160.00	18,284,160.00
SAHARA	1/15/2013	BL	440,945	114.276	114.276	50,389,430.82	50,389,430.82
DUKE OIL	1/22/2013	FB	143,250	119.919	119.919	17,178,396.75	17,178,396.75
FUJAIRAH	1/25/2013	OIL	905,000	115.581	115.581	104,600,805.00	104,600,805.00
TRAFIGURA	1/27/2013	BONGA	901,114	120.169	120.169	108,285,968.27	108,285,968.27
OCEAN BED	1/29/2013	OIL	905,178	116.190	116.190	105,172,631.82	105,172,631.82
TEMPO	1/30/2013	BB	949,629	116.606	118.977	110,732,439.17	112,984,009.53
GLENCORE	1/30/2013	USAN	995,803	116.956	116.956	116,465,135.67	116,465,135.67
DK ENERGY	2/4/2013	ZAFIRO	952,062	115.128	115.128	109,608,993.94	109,608,993.94
MONCLER	2/8/2013	BONGA	902,619	118.552	118.552	107,007,287.69	107,007,287.69
AMG PETROENERGY	2/10/2013	EL	949,292	118.252	118.252	112,255,677.58	112,255,677.58
CALSON	2/11/2013	EA	948,667	119.517	119.517	113,381,833.84	113,381,833.84
ETERNA	2/18/2013	AGBAMI	350,000	111.980	111.980	39,193,000.00	39,193,000.00
TALEVERAS	2/20/2013	FB	20,055	114.357	114.357	2,293,429.64	2,293,429.64
TEMPO	2/26/2013	BB	749,667	111.837	111.837	83,840,508.28	83,840,508.28
BURKINA FASO	3/3/2013	QUA IBOE	949,853	110.697	110.697	105,145,877.54	105,145,877.54
DUKE OIL	3/17/2013	FB	257,850	111.155	111.155	28,661,316.75	28,661,316.75
DUKE OIL	3/17/2013	FB	317,146	111.155	111.155	35,252,363.63	35,252,363.63
FUJAIRAH	3/23/2013	EA	949,827	108.951	108.951	103,484,601.48	103,484,601.48
MASTERS	3/24/2013	QIL	950,136	107.051	107.051	101,713,008.94	101,713,008.94
TRAFIGURA	3/26/2013	BONGA	945,980	109.569	109.569	103,650,082.62	103,650,082.62
GUNVOR	3/31/2013	AGBAMI	499,870	107.501	107.501	53,736,524.87	53,736,524.87
GUNVOR	4/3/2013	AGBAMI	425,323	105.672	105.672	44,944,732.06	44,944,732.06
TEMA	4/4/2013	QIL	865,853	101.605	101.605	87,974,994.07	87,974,994.07
CENTO	4/5/2013	BL	334,101	106.177	106.177	35,473,841.88	35,473,841.88
PETROBRAS	4/11/2013	AKPO	30,000	100.055	100.055	3,001,650.00	3,001,650.00
DUKE OIL	4/12/2013	FB	71,446	108.173	108.173	7,728,484.89	7,728,484.89
ONTARIO	4/22/2013	BB	763,805	104.061	104.061	79,482,312.11	79,482,312.11
SOCAR	4/23/2013	QIL	949,740	101.251	101.251	96,162,124.74	96,162,124.74
AVIDOR	4/24/2013	ERHA	30,000	101.991	101.991	3,059,730.00	3,059,730.00
CENTO	4/24/2013	BL	288,291	104.310	104.310	30,071,634.21	30,071,634.21
TALEVERAS	4/26/2013	QIL	288,913	104.227	104.227	30,112,535.25	30,112,535.25
SAHARA	4/26/2013	FB	498,766	102.927	102.927	51,336,488.08	51,336,488.08

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ELAN	4/28/2013	BB	429,650	104.316	104.316	44,819,369.40	44,819,369.40
CALSON	5/6/2013	ESL	899,474	105.266	105.266	94,684,030.08	94,684,030.08
MONCLEAR	5/11/2013	BG	747,375	106.154	106.154	79,336,845.75	79,336,845.75
REP. OF LIBERIA	5/13/2013	BL	431,308	106.755	106.755	46,044,285.54	46,044,285.54
MEZCOR	5/17/2013	AKPO	993,671	103.774	103.774	103,117,214.35	103,117,214.35
ATEO	5/23/2013	BL	30,000	105.745	105.745	3,172,350.00	3,172,350.00
CENTO	5/23/2013	BG	299,724	105.245	105.245	31,544,452.38	31,544,452.38
CALSON	5/23/2013	BG	904,965	107.145	107.145	96,962,474.93	96,962,474.93
AITEO	5/23/2013	EA	997,480	105.745	105.745	105,478,522.60	105,478,522.60
MECURIA	5/25/2013	QIL	950,284	105.324	105.324	100,087,712.02	100,087,712.02
CALSON	5/26/2013	ESL	284,479	105.724	105.724	30,076,257.80	30,076,257.80
IBETO	5/27/2013	USAN	970,402	101.854	101.854	98,839,325.31	98,839,325.31
RHEINEOIL	5/28/2013	ZF	995,847	101.684	101.684	101,261,706.35	101,261,706.35
LENGARD	5/29/2013	QIL	672,853	105.240	105.240	70,811,049.72	70,811,049.72
VOYAGE	6/3/2013	AGBAMI	974,966	102.845	102.845	100,270,378.27	100,270,378.27
HAVISTAR PETROLEUM	6/7/2013	ESL	450,000	105.234	105.234	47,355,300.00	47,355,300.00
CALSON	6/11/2013	ERHA	664,610	108.277	108.277	71,961,976.97	71,961,976.97
DUKE OIL	6/13/2013	PL	999,006	106.761	106.761	106,654,879.57	106,654,879.57
VITOL	6/14/2013	EA	948,568	106.640	106.640	101,155,291.52	101,155,291.52
TEMPO	6/14/2013	BB	986,609	109.068	109.068	107,607,470.41	107,607,470.41
FUJAIH REFINERY	6/18/2013	QIL	949,960	105.174	105.174	99,911,093.04	99,911,093.04
OANDO	6/20/2013	BG	800,831	104.713	104.713	83,857,416.50	83,857,416.50
DUKE OIL	6/21/2013	FB	88,500	105.740	105.740	9,357,990.00	9,357,990.00
DUKE OIL	6/21/2013	FB	239,399	105.740	105.740	25,314,050.26	25,314,050.26
TEMA OIL REF.	6/22/2013	BB	299,642	104.390	104.390	31,279,628.38	31,279,628.38
TRIDAX	6/26/2013	QIL	488,018	106.979	106.979	52,207,677.62	52,207,677.62
DUKE OIL	7/8/2013	FB	39,403	112.223	112.223	4,421,922.87	4,421,922.87
DUKE OIL	7/8/2013	FB	57,300	112.223	112.223	6,430,377.90	6,430,377.90
HAVISTAR	7/15/2013	QIL	997,979	110.633	110.633	110,409,410.71	110,409,410.71
VOYAGE	7/17/2013	BG	952,733	110.816	110.816	105,578,060.13	105,578,060.13
DUKE OIL	7/20/2013	QIL	772,942	111.055	111.055	85,839,073.81	85,839,073.81
CALSON	7/22/2013	EA	948,098	113.327	113.327	107,445,102.05	107,445,102.05
CALSON	7/25/2013	ESC	995,630	111.721	111.721	111,232,779.23	111,232,779.23
ASTANA	7/30/2013	BL	333,481	110.766	110.766	36,938,356.45	36,938,356.45
OCEAN BED	7/31/2013	BG	809,218	110.913	110.913	89,752,796.03	89,752,796.03
EQUITY TOTAL			128,741,037			14,293,713,819.53	14,315,326,834.63
DOMESTIC							

Investigative Forensic audit of crude oil revenues and remittances by NNPC (January 2012 – July 2013)

KRPC/WRPC	½/2012	GREAT CHINA	299,119	109.90	109.90	32,871,981.62	32,871,981.62
KRPC/WRPC	1/3/2012	PIPELINE	199,082	109.90	109.90	21,878,315.47	21,878,315.47
OCEAN BED TRADING	¼/2012	BB	949,661	110.58	110.58	105,010,664.40	105,010,664.40
KRPC/WRPC	1/7/2012	PIPELINE	146,574	112.94	112.94	16,553,774.41	16,553,774.41
PHRC	1/12/2012	PIPELINE	1,020,418	111.38	111.38	113,653,136.42	113,653,136.42
TRAFIGURA BEHEER	1/13/2012	FB	906,243	112.70	112.70	102,130,867.37	102,130,867.37
DELANEY	1/13/2012	AMENAM	949,571	111.20	111.20	105,589,446.49	105,589,446.49
SIR	1/14/2012	YL	950,778	111.80	111.80	106,294,128.07	106,294,128.07
KRPC/WRPC	1/15/2012	GREAT CHINA	1,098,521	111.55	111.55	122,536,721.99	122,536,721.99
KRPC/WRPC	1/17/2012	PIPELINE	199,623	111.27	111.27	22,212,051.21	22,212,051.21
DUKE OIL	1/18/2012	FB	906,008	112.23	112.23	101,681,277.84	101,681,277.84
VITOL SA	1/19/2012	EA BLEND	948,813	112.43	112.43	106,674,096.78	106,674,096.78
AVIDOR OIL & GAS	1/20/2012	QIL	948,970	111.75	111.75	106,044,550.59	106,044,550.59
ONTARIO TRADING	1/21/2012	BL	905,721	111.75	111.75	101,211,604.59	101,211,604.59
TALEVERAS GROUP	1/23/2012	QIL	950,307	111.90	111.90	106,340,303.61	106,340,303.61
CALSON LTD	1/24/2012	EL	995,695	111.60	111.60	111,123,544.78	111,123,544.78
PHRC	1/30/2012	PIPELINE	529,444	111.80	111.80	59,190,250.87	59,190,250.87
CALSON LTD	1/31/2012	EL	948,197	111.70	111.70	105,914,553.10	105,914,553.10
AITEO ENERGY	2/1/2012	BB	949,760	112.60	112.60	106,938,227.20	106,938,227.20
ONTARIO TRADING	2/4/2012	YL	997,984	114.06	114.06	113,831,053.02	113,831,053.02
SIR	2/5/2012	BB	299,839	114.06	114.06	34,199,936.18	34,199,936.18
UNICORP	2/7/2012	BL	949,245	115.19	115.19	109,347,328.53	109,347,328.53
ETERNA PLC	2/7/2012	QIL	950,420	115.19	115.19	109,482,681.48	109,482,681.48
SIR	2/9/2012	BB	440,081	117.43	117.43	51,680,472.15	51,680,472.15
ASTANA ENERGY	2/9/2012	QIL	950,233	117.43	117.43	111,589,662.12	111,589,662.12
WRPC	2/11/2012	GREAT CHINA	1,097,375	119.75	119.75	131,413,948.38	131,413,948.38
AITEO ENERGY	2/14/2012	QIL	950,040	120.76	120.76	114,729,680.52	114,729,680.52
DUKE OIL	2/15/2012	BL	476,192	122.18	122.18	58,182,567.14	58,182,567.14
CALSON LTD	2/15/2012	BL	996,625	121.18	121.18	120,774,007.38	120,774,007.38
TALEVERAS GROUP	2/17/2012	QIL	950,250	122.51	122.51	116,417,978.25	116,417,978.25
TRAFIGURA BEHEER	2/22/2012	QIL	950,145	123.92	123.92	117,741,968.40	117,741,968.40
CALSON LTD	2/22/2012	BL	996,013	123.92	123.92	123,425,930.96	123,425,930.96
SIR	2/24/2012	BB	210,000	125.17	125.17	26,284,860.00	26,284,860.00
VALESKA TANKERS	2/24/2012	QIL	903,750	125.17	125.17	113,118,772.50	113,118,772.50
TRAFIGURA BEHEER	2/25/2012	AMENAM	903,341	125.50	125.50	113,371,102.18	113,371,102.18
PHRC	2/25/2012	PIPELINE	310,265	126.10	126.10	39,125,037.03	39,125,037.03
WRPC	2/25/2012	GREAT CHINA	499,161	125.80	125.80	62,795,452.12	62,795,452.12

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SIR	2/27/2012	YL	950,658	126.10	126.10	119,879,875.12	119,879,875.12
CALSON LTD	3/4/2012	BL	598,841	127.70	127.70	76,474,391.06	76,474,391.06
AITEO ENERGY	3/5/2012	QIL	950,281	127.70	127.70	121,354,684.82	121,354,684.82
DUKE OIL	3/8/2012	QIL	950,130	126.88	126.88	120,553,444.53	120,553,444.53
OANDO TRADING LTD	3/10/2012	BB	996,968	126.87	126.87	126,481,342.29	126,481,342.29
TRAFIGURA BEHEER	3/12/2012	FB	905,854	128.15	128.15	116,083,378.39	116,083,378.39
SIR	3/12/2012	YL	950,241	126.90	126.90	120,583,682.42	120,583,682.42
CALSON LTD	3/14/2012	EL	948,674	126.83	126.83	120,324,118.12	120,324,118.12
AVIDOR OIL & GAS	3/16/2012	QIL	950,053	126.82	126.82	120,481,921.25	120,481,921.25
PHRC	3/16/2012	PIPELINE	735,768	126.82	126.82	93,307,154.69	93,307,154.69
ONTARIO TRADING	3/17/2012	QIL	950,057	126.82	126.82	120,482,428.51	120,482,428.51
SIR	3/19/2012	BB	949,795	126.85	126.85	120,479,596.16	120,479,596.16
WRPC	3/19/2012	GREAT CHINA	1,098,922	126.60	126.60	139,121,327.36	139,121,327.36
TRAFIGURA BEHEER	3/21/2012	AMENAM	949,399	126.02	126.02	119,642,312.58	119,642,312.58
TALEVERAS GROUP	3/27/2012	QIL	950,341	124.24	124.24	118,073,216.86	118,073,216.86
WRPC	3/29/2012	GREAT CHINA	598,532	122.45	122.45	73,289,644.87	73,289,644.87
PHRC	3/30/2012	PIPELINE	498,550	121.89	121.89	60,765,766.75	60,765,766.75
KRPC/WRPC	4/2/2012	PIPELINE	108,409	122.25	122.25	13,252,458.21	13,252,458.21
SIR	4/7/2012	EL	947,837	119.16	119.16	112,947,100.43	112,947,100.43
TRIDAX OIL & GAS	4/8/2012	QIL	950,175	119.41	119.41	113,463,247.28	113,463,247.28
KRPC/WRPC	4/8/2012	PIPELINE	198,489	119.16	119.16	23,652,544.71	23,652,544.71
KRPC/WRPC	4/8/2012	PIPELINE	89,864	120.76	120.76	10,852,246.23	10,852,246.23
AITEO ENERGY	4/9/2012	QIL	950,156	119.41	119.41	113,460,978.43	113,460,978.43
ONTARIO TRADING	4/10/2012	BB	949,708	119.46	119.46	113,454,017.10	113,454,017.10
SIR	4/10/2012	YL	997,318	119.46	119.46	119,141,602.92	119,141,602.92
TALEVERAS GROUP	4/13/2012	QIL	950,471	119.67	119.67	113,740,963.63	113,740,963.63
KRPC/WRPC	4/15/2012	PIPELINE	77,477	121.02	121.02	9,376,111.59	9,376,111.59
KRPC/WRPC	4/17/2012	PIPELINE	599,412	119.16	119.16	71,427,132.74	71,427,132.74
KRPC/WRPC	4/17/2012	PIPELINE	329,213	119.16	119.16	39,229,679.51	39,229,679.51
KRPC/WRPC	4/18/2012	PIPELINE	128,044	121.21	121.21	15,520,597.37	15,520,597.37
KRPC/WRPC	4/19/2012	PIPELINE	173,617	120.03	120.03	20,839,422.13	20,839,422.13
SAHARA ENERGY	4/21/2012	BL	907,058	119.29	119.29	108,206,577.05	108,206,577.05
TRAFIGURA BEHEER	4/24/2012	AMENAM	949,600	115.71	115.71	109,878,216.00	109,878,216.00
SIR	4/24/2012	BB	949,880	116.36	116.36	110,528,036.80	110,528,036.80
TRAFIGURA BEHEER	4/27/2012	QIL	949,779	114.53	114.53	108,774,389.75	108,774,389.75
CALSON LTD	4/28/2012	EL	947,137	114.28	114.28	108,235,027.81	108,235,027.81
KRPC/WRPC	4/30/2012	GREAT CHINA	698,302	114.35	114.35	79,850,135.40	79,850,135.40

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SAHARA ENERGY	5/3/2012	BL	907,372	112.74	112.74	102,298,934.02	102,298,934.02
KRPC/WRPC	5/3/2012	PIPELINE	298,518	112.44	112.44	33,565,960.96	33,565,960.96
AITEO ENERGY	5/7/2012	QIL	911,050	112.37	112.37	102,376,510.60	102,376,510.60
KRPC/WRPC	5/8/2012	PIPELINE	199,115	111.82	111.82	22,265,238.42	22,265,238.42
AITEO ENERGY	5/9/2012	QIL	40,119	111.28	111.28	4,464,321.96	4,464,321.96
KRPC/WRPC	5/9/2012	PIPELINE	133,678	112.63	112.63	15,055,752.11	15,055,752.11
TRAFIGURA BEHEER	5/13/2012	AMENAM	949,307	110.07	110.07	104,485,474.96	104,485,474.96
KRPC/WRPC	5/15/2012	PIPELINE	299,061	109.75	109.75	32,821,944.75	32,821,944.75
TRAFIGURA BEHEER	5/16/2012	BL	906,457	109.39	109.39	99,155,518.32	99,155,518.32
KRPC/WRPC	5/16/2012	GREAT CHINA	599,175	109.09	109.09	65,362,802.40	65,362,802.40
KRPC/WRPC	5/16/2012	PIPELINE	150,503	110.74	110.74	16,666,401.21	16,666,401.21
KRPC/WRPC	5/17/2012	PIPELINE	299,117	107.94	107.94	32,286,389.86	32,286,389.86
TRAFIGURA BEHEER	5/23/2012	QIL	950,289	102.37	102.37	97,282,035.22	97,282,035.22
TRAFIGURA BEHEER	5/24/2012	BL	906,171	101.64	101.64	92,099,595.76	92,099,595.76
ONTARIO TRADING	5/24/2012	AMENAM	950,054	100.89	100.89	95,847,147.84	95,847,147.84
SIR	5/25/2012	BB	949,935	101.20	101.20	96,134,371.94	96,134,371.94
SIR	5/29/2012	YL	950,056	99.76	99.76	94,779,486.67	94,779,486.67
KRPC/WRPC	5/30/2012	GREAT CHINA	1,097,063	99.39	99.39	109,040,382.76	109,040,382.76
KRPC/WRPC	5/31/2012	PIPELINE	248,952	98.85	98.85	24,609,154.15	24,609,154.15
KRPC/WRPC	6/4/2012	PIPELINE	112,910	99.83	99.83	11,272,031.12	11,272,031.12
KRPC/WRPC	6/6/2012	PIPELINE	299,187	97.57	97.57	29,192,872.34	29,192,872.34
TALEVERAS GROUP	6/7/2012	BL	906,031	96.08	96.08	87,054,176.57	87,054,176.57
SIR	6/13/2012	BB	479,569	92.02	92.02	44,131,378.09	44,131,378.09
TALEVERAS GROUP	6/14/2012	BL	903,954	92.48	92.48	83,598,569.87	83,598,569.87
KRPC/WRPC	6/15/2012	GREAT CHINA	1,098,650	93.51	93.51	102,731,465.55	102,731,465.55
TALEVERAS GROUP	6/21/2012	QIL	950,347	92.43	92.43	87,841,523.56	87,841,523.56
TALEVERAS GROUP	6/23/2012	BL	907,198	93.46	93.46	84,784,003.49	84,784,003.49
ONTARIO TRADING	6/23/2012	AMENAM	949,076	92.66	92.66	87,938,534.93	87,938,534.93
TRAFIGURA BEHEER	6/23/2012	QIL	950,226	93.46	93.46	88,805,271.28	88,805,271.28
SIR	6/24/2012	BB	470,000	93.46	93.46	43,924,790.00	43,924,790.00
KRPC/WRPC	6/24/2012	PIPELINE	299,694	93.46	93.46	28,008,502.16	28,008,502.16
TRAFIGURA BEHEER	6/25/2012	QIL	950,112	94.55	94.55	89,836,890.05	89,836,890.05
SIR	6/30/2012	YL	950,335	93.51	102.10	88,862,974.85	97,024,451.83
KRPC/WRPC	6/30/2012	PIPELINE	298,511	93.51	93.51	27,912,868.08	27,912,868.08
TALEVERAS GROUP	7/3/2012	QIL	950,500	94.53	94.53	89,854,567.00	89,854,567.00
KRPC/WRPC	7/3/2012	PIPELINE	328,921	94.63	94.63	31,127,109.91	31,127,109.91
CALSON LTD	7/4/2012	BL	905,569	96.56	96.56	87,442,648.21	87,442,648.21

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KRPC/WRPC	7/7/2012	PIPELINE	201,277	100.96	100.96	20,320,925.92	20,320,925.92
CALSON LTD	7/8/2012	QIL	997,437	100.86	100.86	100,601,495.82	100,601,495.82
KRPC/WRPC	7/9/2012	PIPELINE	199,239	106.87	106.87	21,292,871.17	21,292,871.17
ONTARIO TRADING	7/11/2012	AMENAM	949,543	100.49	100.49	95,422,424.70	95,422,424.70
KRPC/WRPC	7/11/2012	PIPELINE	213,912	101.54	104.81	21,721,266.22	22,419,261.07
CALSON LTD	7/12/2012	BL	906,611	101.41	101.41	91,943,047.95	91,943,047.95
KRPC/WRPC	7/13/2012	PIPELINE	199,568	101.07	101.07	20,169,739.06	20,169,739.06
KRPC/WRPC	7/14/2012	PIPELINE	149,465	103.10	103.10	15,409,094.18	15,409,094.18
KRPC/WRPC	7/15/2012	GREAT CHINA	698,081	101.85	101.85	71,096,059.45	71,096,059.45
KRPC/WRPC	7/17/2012	PIPELINE	209,215	102.56	102.56	21,456,044.33	21,456,044.33
TRAFIGURA BEHEER	7/18/2012	EA BLEND	905,974	104.59	104.59	94,752,196.76	94,752,196.76
KRPC/WRPC	7/19/2012	PIPELINE	146,740	106.11	106.11	15,569,994.44	15,569,994.44
KRPC/WRPC	7/22/2012	PIPELINE	199,739	105.93	105.93	21,158,152.53	21,158,152.53
NAPOIL	7/24/2012	QIL	950,093	106.77	106.77	101,442,379.70	101,442,379.70
CALSON LTD	7/26/2012	BL	904,880	106.59	106.59	96,448,444.56	96,448,444.56
SIR	7/26/2012	BB	949,782	106.59	106.59	101,234,414.03	101,234,414.03
SIR	7/27/2012	YL	949,941	106.02	106.02	100,712,744.82	100,712,744.82
TRAFIGURA BEHEER	7/27/2012	QIL	950,179	106.02	106.02	100,737,977.58	100,737,977.58
KRPC/WRPC	7/27/2012	PIPELINE	155,773	107.37	107.37	16,725,347.01	16,725,347.01
KRPC/WRPC	7/29/2012	GREAT CHINA	797,582	105.98	105.98	84,526,942.78	84,526,942.78
CALSON LTD	8/1/2012	BL	949,122	106.32	106.32	100,911,600.16	100,911,600.16
VALESKA TANKERS	8/3/2012	AGBAMI	974,671	104.93	104.93	102,267,354.68	102,267,354.68
CALSON LTD	8/7/2012	EL	994,641	109.32	109.32	108,729,180.92	108,729,180.92
PHRC	8/8/2012	PIPELINE	398,132	110.53	110.53	44,004,733.70	44,004,733.70
AITEO ENERGY	8/9/2012	BL	948,850	111.93	111.93	106,204,780.50	106,204,780.50
KRPC/WRPC	8/9/2012	PIPELINE	166,138	113.38	113.38	18,836,726.44	18,836,726.44
CALSON LTD	8/13/2012	BL	948,192	113.75	113.75	107,857,788.19	107,857,788.19
PHRC	8/14/2012	PIPELINE	180,610	114.56	114.56	20,690,320.38	20,690,320.38
TALEVERAS GROUP	8/16/2012	AMENAM	949,463	114.07	114.07	108,306,193.87	108,306,193.87
ONTARIO TRADING	8/17/2012	QIL	950,096	114.74	114.74	109,016,865.33	109,016,865.33
CALSON LTD	8/17/2012	EL	948,273	114.89	114.89	108,949,929.79	108,949,929.79
AITEO ENERGY	8/20/2012	YL	950,020	115.15	115.15	109,396,703.04	109,396,703.04
SIR	8/23/2012	BB	949,628	114.82	114.82	109,037,236.59	109,037,236.59
TRAFIGURA BEHEER	8/23/2012	QIL	950,300	114.82	114.82	109,114,396.30	109,114,396.30
TRAFIGURA BEHEER	8/27/2012	QIL	946,657	114.69	114.69	108,574,931.30	108,574,931.30
CALSON LTD	8/29/2012	EL	995,579	115.37	115.81	114,862,935.97	115,293,026.10
PHRC	8/31/2012	PIPELINE	333,819	115.40	115.40	38,521,377.32	38,521,377.32

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CALSON LTD	9/2/2012	BL	947,427	114.92	114.92	108,879,258.27	108,879,258.27
SIR	9/3/2012	YL	950,085	114.92	114.92	109,184,718.29	109,184,718.29
CALSON LTD	9/6/2012	EL	948,104	114.29	114.29	108,354,065.64	108,354,065.64
ONTARIO TRADING	9/6/2012	QIL	950,260	114.09	114.09	108,410,412.10	108,410,412.10
PHRC	9/11/2012	PIPELINE	765,735	110.84	110.84	84,872,535.93	84,872,535.93
PHRC	9/14/2012	PIPELINE	336,839	111.35	111.35	37,507,022.65	37,507,022.65
KRPC/WRPC	9/15/2012	PIPELINE	1,098,451	111.55	111.55	122,532,209.05	122,532,209.05
AITEO ENERGY	9/17/2012	AMENAM	997,155	110.62	110.62	110,306,283.26	110,306,283.26
REP OF SENEGAL	9/18/2012	QIL	950,389	110.79	110.79	105,291,696.53	105,291,696.53
KRPC/WRPC	9/19/2012	PIPELINE	138,887	112.27	112.27	15,592,982.38	15,592,982.38
SIR	9/20/2012	BB	949,550	111.33	111.33	105,715,300.60	105,715,300.60
CALSON LTD	9/23/2012	EL	947,981	111.50	111.50	105,699,881.50	105,699,881.50
TRAFIGURA BEHEER	9/24/2012	EA BLEND	905,301	113.58	113.58	102,824,087.58	102,824,087.58
TRAFIGURA BEHEER	9/25/2012	QIL	950,461	111.37	111.37	105,853,792.03	105,853,792.03
KRPC/WRPC	9/27/2012	PIPELINE	174,303	112.32	112.32	19,577,887.26	19,577,887.26
TALEVERAS GROUP	9/28/2012	AMENAM	949,621	110.68	110.68	105,105,951.52	105,105,951.52
SIR	9/28/2012	YL	950,012	111.38	111.38	105,814,236.58	105,814,236.58
CALSON LTD	9/30/2012	BB	100,000	111.35	111.35	11,135,000.00	11,135,000.00
CALSON LTD	9/30/2012	EL	948,273	111.55	111.55	105,779,853.15	105,779,853.15
PHRC	9/30/2012	PIPELINE	849,551	111.35	111.35	94,597,503.85	94,597,503.85
KRPC/WRPC	10/3/2012	HEIBEI	498,407	112.91	112.91	56,276,629.59	56,276,629.59
KRPC/WRPC	10/6/2012	PIPELINE	183,417	114.46	114.46	20,992,992.74	20,992,992.74
KRPC/WRPC	10/10/2012	PIPELINE	123,395	112.67	112.67	13,903,284.84	13,903,284.84
AITEO ENERGY	10/11/2012	QIL	950,220	110.43	110.43	104,929,943.94	104,929,943.94
KRPC/WRPC	10/11/2012	PIPELINE	199,404	110.43	110.43	22,019,585.51	22,019,585.51
KRPC/WRPC	10/14/2012	PIPELINE	209,861	109.87	109.87	23,058,057.65	23,058,057.65
PHRC	10/16/2012	PIPELINE	142,402	110.22	110.22	15,695,690.84	15,695,690.84
TRAFIGURA BEHEER	10/18/2012	EL	948,108	110.38	110.38	104,649,316.72	104,649,316.72
TALEVERAS GROUP	10/21/2012	QIL	950,150	109.82	109.82	104,348,323.45	104,348,323.45
SIR	10/22/2012	BB	949,540	109.78	109.78	104,243,349.82	104,243,349.82
ONTARIO TRADING	10/22/2012	AMENAM	949,935	109.08	109.08	103,621,759.61	103,621,759.61
KRPC/WRPC	10/22/2012	HEIBEI	798,933	109.78	109.93	87,709,261.54	87,823,508.96
TRAFIGURA BEHEER	10/25/2012	QIL	950,107	109.36	109.36	103,906,551.84	103,906,551.84
SAHARA ENERGY	10/27/2012	BB	499,389	109.75	109.87	54,807,443.36	54,869,367.60
TRAFIGURA BEHEER	10/28/2012	QIL	904,947	109.75	109.75	99,317,028.30	99,317,028.30
SIR	10/28/2012	YL	950,049	109.75	109.75	104,266,927.70	104,266,927.70
CALSON LTD	10/29/2012	EL	788,625	109.87	109.87	86,648,594.63	86,648,594.63

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PHRC	10/31/2012	PIPELINE	952,848	109.66	109.66	104,485,500.29	104,485,500.29
KRPC/WRPC	11/2/2012	PIPELINE	698,958	109.85	109.85	76,779,837.34	76,779,837.34
CALSON LTD	11/6/2012	EL	120,000	110.08	110.08	13,209,120.00	13,209,120.00
KRPC/WRPC	11/9/2012	PIPELINE	199,963	109.51	109.51	21,898,548.02	21,898,548.02
PHRC	11/10/2012	PIPELINE	849,190	109.85	109.85	93,282,672.31	93,282,672.31
CALSON LTD	11/11/2012	EL	40,000	109.90	109.90	4,395,960.00	4,395,960.00
KRPC/WRPC	11/13/2012	PIPELINE	299,615	110.74	110.74	33,180,563.56	33,180,563.56
FUJAIH REFINERY	11/15/2012	FB	906,177	111.80	111.80	101,311,494.78	101,311,494.78
KRPC/WRPC	11/15/2012	HEIBEI	329,732	110.45	110.45	36,419,229.13	36,419,229.13
CALSON LTD	11/17/2012	EL	324,271	110.69	110.69	35,893,556.99	35,893,556.99
CALSON LTD	11/17/2012	BL	349,869	110.64	110.64	38,709,506.16	38,709,506.16
ONTARIO TRADING	11/18/2012	BL	927,549	110.64	110.64	102,624,021.36	102,624,021.36
KRPC/WRPC	11/18/2012	HEIBEI	329,691	110.69	110.69	36,493,496.79	36,493,496.79
TALEVERAS GROUP	11/19/2012	QIL	905,311	110.64	110.64	100,163,609.04	100,163,609.04
AITEO ENERGY	11/21/2012	AMENAM	949,566	110.27	110.30	104,707,693.25	104,733,331.54
SIR	11/21/2012	YL	950,284	111.25	111.25	105,715,293.86	105,715,293.86
KRPC/WRPC	11/21/2012	PIPELINE	329,543	111.30	111.30	36,676,817.73	36,676,817.73
CALSON LTD	11/25/2012	BL	953,605	110.97	110.97	105,824,407.67	105,824,407.67
KRPC/WRPC	11/28/2012	PIPELINE	1,099,299	109.98	109.98	120,905,301.22	120,905,301.22
PHRC	11/30/2012	PIPELINE	1,000,408	110.76	110.76	110,802,188.86	110,802,188.86
GUNVOR	12/3/2012	QIL	905,063	110.35	110.35	99,871,891.92	99,871,891.92
KRPC/WRPC	12/4/2012	PIPELINE	298,782	109.90	109.90	32,835,544.24	32,835,544.24
TRAFIGURA BEHEER	12/5/2012	QIL	905,032	109.93	109.93	99,493,787.89	99,493,787.89
CALSON LTD	12/5/2012	BL	996,965	109.93	109.93	109,600,350.31	109,600,350.31
KRPC/WRPC	12/5/2012	PIPELINE	161,076	111.33	111.33	17,933,235.38	17,933,235.38
PHRC	12/6/2012	PIPELINE	677,491	110.36	110.36	74,768,584.25	74,768,584.25
SIR	12/7/2012	BB	906,445	110.76	110.76	100,395,128.87	100,395,128.87
TRAFIGURA BEHEER	12/8/2012	EL	948,525	110.81	110.81	105,103,209.68	105,103,209.68
TRAFIGURA BEHEER	12/8/2012	QIL	950,168	110.76	110.76	105,237,757.18	105,237,757.18
TRAFIGURA BEHEER	12/9/2012	FB	905,266	112.16	112.16	101,531,918.76	101,531,918.76
KRPC/WRPC	12/10/2012	PIPELINE	299,225	111.07	111.07	33,235,818.43	33,235,818.43
AITEO ENERGY	12/13/2012	AMENAM	949,365	109.08	109.08	103,560,531.66	103,560,531.66
KRPC/WRPC	12/16/2012	PIPELINE	199,291	110.86	110.86	22,092,802.39	22,092,802.39
TALEVERAS GROUP	12/17/2012	BL	948,498	110.81	110.81	105,100,217.89	105,100,217.89
REP OF SENEGAL	12/18/2012	YL	904,970	111.09	111.09	100,536,737.18	100,536,737.18
TALEVERAS GROUP	12/19/2012	BL	902,930	111.32	111.32	100,515,973.46	100,515,973.46
KRPC/WRPC	12/22/2012	PIPELINE	119,923	113.42	113.42	13,602,146.35	13,602,146.35

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SAHARA	12/24/2012	BL	429,524	112.02	112.02	48,116,996.58	48,116,996.58
CALSON LTD	12/25/2012	QIL	949,894	111.71	111.71	106,113,608.63	106,113,608.63
ONTARIO TRADING	12/26/2012	QIL	949,931	111.71	111.71	106,117,741.94	106,117,741.94
SIR	12/28/2012	EL	948,206	111.70	111.70	105,917,454.82	105,917,454.82
PHRC	12/29/2012	PIPELINE	815,387	111.37	111.37	90,811,280.96	90,811,280.96
SIR	12/31/2012	YL	905,568	111.37	111.37	100,854,919.30	100,854,919.30
KRPC/WRPC	1/2/2013	PIPELINE	207,042	111.82	111.82	23,151,850.52	23,151,850.52
TRAFIGURA BEHEER	1/3/2013	FB	905,844	113.87	113.87	103,147,550.44	103,147,550.44
KRPC/WRPC	¼/2013	PIPELINE	329,860	113.84	113.84	37,551,592.26	37,551,592.26
TRAFIGURA BEHEER	1/8/2013	FB	906,854	116.18	116.18	105,361,925.14	105,361,925.14
PHRC	1/9/2013	PIPELINE	634,065	113.86	113.86	72,193,372.77	72,193,372.77
KRPC/WRPC	1/9/2013	HEIBEI	1,098,978	113.91	113.91	125,182,386.02	125,182,386.02
KRPC/WRPC	1/11/2013	PIPELINE	329,873	113.79	113.79	37,536,578.54	37,536,578.54
KRPC/WRPC	1/12/2013	PIPELINE	174,063	114.94	114.94	20,006,975.28	20,006,975.28
AITEO ENERGY	1/14/2013	YL	950,019	114.01	114.01	108,315,466.27	108,315,466.27
PHRC	1/14/2013	PIPELINE	860,688	114.01	114.01	98,130,481.63	98,130,481.63
TRAFIGURA BEHEER	1/16/2013	QIL	904,945	114.33	114.33	103,457,837.13	103,457,837.13
KRPC/WRPC	1/16/2013	PIPELINE	159,915	114.38	114.38	18,290,278.13	18,290,278.13
LENGARD PROJECTS	1/18/2013	EA BLEND	905,886	114.68	114.68	103,890,630.02	103,890,630.02
KRPC/WRPC	1/18/2013	PIPELINE	177,147	113.53	113.53	20,112,207.50	20,112,207.50
VITOL SA	1/22/2013	EA BLEND	948,455	115.81	115.81	109,844,367.37	109,844,367.37
SIR	1/22/2013	BB	949,412	114.06	114.06	108,293,730.37	108,293,730.37
ONTARIO TRADING	1/22/2013	BL	950,706	114.06	114.06	108,441,329.18	108,441,329.18
KRPC/WRPC	1/23/2013	PIPELINE	89,407	114.38	114.38	10,226,015.03	10,226,015.03
TALEVERAS GROUP	1/24/2013	AMENAM	949,583	114.02	114.02	108,268,604.91	108,268,604.91
PHRC	1/25/2013	PIPELINE	1,231,176	115.58	115.58	142,300,553.26	142,300,553.26
CALSON LTD	1/26/2013	EL	851,524	116.03	116.03	98,800,626.67	98,800,626.67
AZENITH ENERGY	1/28/2013	FB	905,729	117.18	117.18	106,131,512.76	106,131,512.76
PHRC	1/28/2013	PIPELINE	571,066	115.98	115.98	66,231,092.55	66,231,092.55
SIR	1/29/2013	YL	950,330	116.19	116.19	110,418,842.70	110,418,842.70
KRPC/WRPC	1/29/2013	HEIBEI	799,237	116.24	116.24	92,903,308.88	92,903,308.88
SIR	1/30/2013	QIL	904,837	116.91	116.91	105,788,113.02	105,788,113.02
TRAFIGURA BEHEER	1/30/2013	FB	906,717	117.81	117.81	106,816,702.90	106,816,702.90
KRPC/WRPC	2/3/2013	PIPELINE	299,460	117.88	117.88	35,299,745.88	35,299,745.88
KRPC/WRPC	2/10/2013	PIPELINE	149,647	118.35	118.35	17,711,021.74	17,711,021.74
KRPC/WRPC	2/12/2013	HEIBEI	1,099,006	117.00	117.00	128,586,999.02	128,586,999.02
KRPC/WRPC	2/13/2013	PIPELINE	128,656	117.46	117.46	15,111,290.48	15,111,290.48

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TALEVERAS GROUP	2/14/2013	QIL	950,012	115.68	115.68	109,896,438.15	109,896,438.15
KRPC/WRPC	2/15/2013	PIPELINE	299,721	115.08	115.08	34,490,693.80	34,490,693.80
SIR	2/16/2013	BB	949,167	114.88	114.88	109,036,508.29	109,036,508.29
PHRC	2/16/2013	PIPELINE	853,699	114.98	114.98	98,154,896.22	98,154,896.22
AITEO ENERGY	2/17/2013	AMENAM	949,700	113.93	113.93	108,195,522.20	108,195,522.20
KRPC/WRPC	2/20/2013	PIPELINE	243,053	113.16	113.16	27,503,148.32	27,503,148.32
TRAFIGURA BEHEER	2/21/2013	BL	905,972	112.76	112.76	102,153,778.83	102,153,778.83
CALSON LTD	2/23/2013	EL	949,275	112.60	112.60	106,892,162.10	106,892,162.10
PHRC	2/25/2013	PIPELINE	252,240	112.30	112.30	28,327,560.96	28,327,560.96
SIR	2/27/2013	YL	949,982	111.34	111.34	105,772,895.84	105,772,895.84
KRPC/WRPC	2/27/2013	PIPELINE	299,692	111.44	111.44	33,398,275.86	33,398,275.86
KRPC/WRPC	2/28/2013	HEIBEI	798,599	110.93	110.93	88,586,191.27	88,586,191.27
TRAFIGURA BEHEER	3/3/2013	EA BLEND	948,217	112.60	112.60	106,766,389.55	106,766,389.55
REPUBLIC OF LIBERIA	3/4/2013	BL	300,270	110.62	110.62	33,217,068.48	33,217,068.48
ONTARIO TRADING	3/6/2013	AMENAM	997,064	109.49	109.49	109,172,525.62	109,172,525.62
ASTANA ENERGY	3/7/2013	QIL	788,378	110.09	110.09	86,795,687.53	86,795,687.53
AITEO ENERGY	3/10/2013	QIL	997,455	109.48	109.48	109,199,378.49	109,199,378.49
KRPC/WRPC	3/12/2013	HEIBEI	698,472	109.23	109.23	76,294,096.56	76,294,096.56
TRAFIGURA BEHEER	3/14/2013	QIL	950,057	109.20	109.20	103,747,174.46	103,747,174.46
PHRC	3/14/2013	PIPELINE	367,090	109.20	109.20	40,086,595.09	40,086,595.09
TALEVERAS GROUP	3/16/2013	AMENAM	943,563	108.58	108.58	102,450,183.41	102,450,183.41
CALSON LTD	3/17/2013	EL	888,084	109.78	109.78	97,492,085.35	97,492,085.35
REP OF SIERRA LEONE	3/21/2013	BL	649,983	108.16	108.16	70,301,511.30	70,301,511.30
HAVISTAR	3/21/2013	QIL	949,977	108.16	108.16	102,748,562.34	102,748,562.34
PHRC	3/22/2013	PIPELINE	392,690	107.05	107.05	42,037,857.19	42,037,857.19
KRPC/WRPC	3/23/2013	PIPELINE	136,872	107.40	107.40	14,700,189.67	14,700,189.67
AITEO ENERGY	3/24/2013	BL	948,776	107.05	107.05	101,567,419.58	101,567,419.58
SIR	3/25/2013	BB	907,072	106.22	106.22	96,351,001.98	96,351,001.98
KRPC/WRPC	3/25/2013	PIPELINE	49,232	106.77	106.77	5,256,599.10	5,256,599.10
TRAFIGURA BEHEER	3/27/2013	FB	906,263	106.73	106.73	96,722,731.20	96,722,731.20
SIR	3/27/2013	YL	949,692	105.43	105.43	100,123,178.48	100,123,178.48
KRPC/WRPC	3/28/2013	HEIBEI	1,098,739	105.00	105.00	115,371,989.96	115,371,989.96
KRPC/WRPC	3/30/2013	PIPELINE	200,158	105.00	105.00	21,017,390.63	21,017,390.63
ONTARIO TRADING	3/31/2013	QIL	949,995	104.65	104.65	99,420,776.73	99,420,776.73
KRPC/WRPC	4/3/2013	PIPELINE	154,795	103.17	103.17	15,970,509.74	15,970,509.74
KRPC/WRPC	4/6/2013	PIPELINE	297,963	101.71	101.71	30,305,220.80	30,305,220.80
KRPC/WRPC	4/8/2013	HEIBEI	498,362	101.75	101.75	50,708,831.86	50,708,831.86

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KRPC/WRPC	4/10/2013	PIPELINE	161,149	103.53	103.53	16,684,239.42	16,684,239.42
PHRC	4/14/2013	PIPELINE	391,395	101.16	101.16	39,592,735.41	39,592,735.41
SIR	4/15/2013	FB	906,230	102.50	102.50	92,889,481.23	92,889,481.23
TALEVERAS GROUP	4/15/2013	QIL	949,890	101.20	101.20	96,129,817.89	96,129,817.89
CALSON LTD	4/16/2013	EL	949,043	101.94	101.94	96,746,392.46	96,746,392.46
AITEO ENERGY	4/18/2013	AMENAM	949,460	101.97	101.97	96,818,335.12	96,818,335.12
KRPC/WRPC	4/18/2013	HEIBEI	598,783	103.17	103.17	61,777,639.68	61,777,639.68
AZENITH ENERGY	4/19/2013	QIL	950,234	101.61	101.61	96,548,525.57	96,548,525.57
TRAFIGURA BEHEER	4/22/2013	FB	905,432	102.51	102.51	92,814,023.46	92,814,023.46
TRAFIGURA BEHEER	4/23/2013	YL	949,984	101.25	101.25	96,186,829.98	96,186,829.98
PHRC	4/24/2013	PIPELINE	416,055	101.49	101.49	42,225,838.01	42,225,838.01
KRPC/WRPC	4/27/2013	HEIBEI	1,097,839	104.17	104.17	114,356,399.44	114,356,399.44
CRUDEX OIL	5/6/2013	QIL	949,854	104.87	104.87	99,607,389.56	99,607,389.56
ONTARIO TRADING	5/9/2013	BL	999,445	105.71	105.71	105,650,331.51	105,650,331.51
MASTERS ENERGY	5/10/2013	QIL	950,000	105.65	105.65	100,371,300.00	100,371,300.00
ONTARIO TRADING	5/12/2013	AMENAM	949,234	104.90	104.90	99,578,443.54	99,578,443.54
KRPC/WRPC	5/15/2013	HEIBEI	1,098,502	105.72	105.72	116,138,025.45	116,138,025.45
AITEO ENERGY	5/16/2013	QIL	949,908	105.30	105.30	100,020,562.86	100,020,562.86
PHRC	5/16/2013	PIPELINE	464,436	105.30	105.30	48,902,788.62	48,902,788.62
CALSON LTD	5/18/2013	BL	950,233	105.37	105.37	100,129,852.14	100,129,852.14
KRPC/WRPC	5/18/2013	PIPELINE	139,111	105.77	105.77	14,714,326.91	14,714,326.91
TRAFIGURA BEHEER	5/19/2013	FB	906,327	106.67	106.67	96,681,526.40	96,681,526.40
SIR	5/19/2013	QIL	949,878	105.37	105.37	100,092,444.37	100,092,444.37
TRAFIGURA BEHEER	5/20/2013	BL	949,729	105.49	105.03	100,182,163.57	99,753,835.79
SIR	5/23/2013	YL	950,435	105.25	106.31	100,028,531.58	101,038,843.98
KRPC/WRPC	5/23/2013	PIPELINE	22,055	105.65	105.65	2,330,000.48	2,330,000.48
PHRC	5/25/2013	PIPELINE	158,800	105.32	105.32	16,725,451.20	16,725,451.20
TALEVERAS GROUP	5/28/2013	AMENAM	949,895	104.23	104.23	99,011,355.43	99,011,355.43
KRPC/WRPC	5/31/2013	PIPELINE	199,667	105.72	105.72	21,109,593.91	21,109,593.91
KRPC/WRPC	6/2/2013	PIPELINE	199,851	105.70	105.70	21,123,251.45	21,123,251.45
KRPC/WRPC	6/4/2013	HEIBEI	663,631	105.77	105.77	70,194,905.39	70,194,905.39
SIR	6/7/2013	YL	950,261	105.48	105.48	100,237,331.32	100,237,331.32
AZENITH ENERGY	6/10/2013	QIL	949,944	105.93	105.93	100,623,768.14	100,623,768.14
SIR	6/11/2013	AMENAM	949,303	104.22	104.22	98,940,155.87	98,940,155.87
TRAFIGURA BEHEER	6/12/2013	QIL	906,660	104.22	104.22	94,490,291.88	94,490,291.88
KRPC/WRPC	6/12/2013	PIPELINE	199,807	104.72	104.72	20,923,389.43	20,923,389.43
CALSON LTD	6/14/2013	EL	308,131	105.19	105.19	32,412,299.89	32,412,299.89

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TRAFIGURA BEHEER	6/15/2013	BL	419,284	104.69	104.69	43,894,841.96	43,894,841.96
AITEO	6/15/2013	QIL	950,171	104.69	104.69	99,473,401.99	99,473,401.99
KRPC/WRPC	6/15/2013	PIPELINE	199,682	105.19	105.19	21,004,549.58	21,004,549.58
PHRC	6/16/2013	PIPELINE	41,713	104.69	104.69	4,366,933.97	4,366,933.97
KRPC/WRPC	6/18/2013	PIPELINE	107,387	105.67	105.67	11,348,013.84	11,348,013.84
CALSON LTD	6/19/2013	EL	594,691	104.67	104.67	62,245,117.59	62,245,117.59
TRAFIGURA BEHEER	6/24/2013	BL	486,968	105.35	105.35	51,302,078.80	51,302,078.80
ONTARIO	6/24/2013	QIL	950,125	105.35	105.35	100,095,668.75	100,095,668.75
SIR	6/24/2013	YL	950,246	105.35	105.35	100,108,416.10	100,108,416.10
TALEVERAS GROUP	6/25/2013	AMENAM	949,371	104.84	104.84	99,528,258.16	99,528,258.16
KRPC/WRPC	6/25/2013	PIPELINE	165,187	106.34	106.34	17,565,324.83	17,565,324.83
KRPC/WRPC	6/27/2013	HEIBEI	648,331	104.72	104.72	67,891,925.66	67,891,925.66
TRAFIGURA BEHEER	6/29/2013	FB	949,118	105.79	105.79	100,407,193.22	100,407,193.22
KRPC/WRPC	6/29/2013	PIPELINE	56,691	105.19	105.19	5,963,326.29	5,963,326.29
KRPC/WRPC	7/3/2013	PIPELINE	53,846	105.44	105.44	5,677,306.86	5,677,306.86
CRUDEX OIL	7/5/2013	QIL	949,482	106.62	106.62	101,234,720.32	101,234,720.32
SIR	7/5/2013	YL	997,495	106.62	106.62	106,353,914.40	106,353,914.40
AITEO	7/8/2013	QIL	950,082	107.59	107.59	102,222,172.63	102,222,172.63
CALSON LTD	7/9/2013	EL	899,008	109.04	109.04	98,026,034.30	98,026,034.30
TALEVERAS GROUP	7/10/2013	QIL	951,022	109.32	109.32	103,966,676.06	103,966,676.06
PHRC	7/16/2013	PIPELINE	86,213	110.41	110.41	9,519,035.97	9,519,035.97
KRPC/WRPC	7/16/2013	HEIBEI	998,176	110.91	110.91	110,710,694.69	110,710,694.69
KRPC/WRPC	7/22/2013	PIPELINE	14,217	111.22	111.22	1,581,157.87	1,581,157.87
ONTARIO	7/25/2013	QIL	950,494	110.63	110.63	105,156,002.70	105,156,002.70
TRAFIGURA BEHEER	7/27/2013	QIL	949,950	110.91	110.91	105,357,054.60	105,357,054.60
SIR	7/28/2013	AMENAM	949,967	110.26	110.26	104,741,461.49	104,741,461.49
TRAFIGURA BEHEER	7/30/2013	FB	906,088	110.77	112.12	100,363,743.41	101,586,962.21
KRPC/WRPC	7/30/2013	HEIBEI	828,123	111.27	111.27	92,141,933.72	92,141,933.72
SIR	7/31/2013	YL	950,886	110.41	110.41	104,990,175.92	104,990,175.92
DOMESTIC TOTAL			254,738,219			28,215,731,690.57	28,227,028,265.89
FIRS							
BURKINA FASO (PSTI)	02/01/12	ERHA	997,733	110.646	110.646	110,395,165.52	110,395,165.52
COTE D'IVOIRE	02/01/12	BONGA	253,111	110.296	110.296	27,917,130.86	27,917,130.86
MEZCOR	08/01/12	BONGA	996,806	112.188	112.188	111,829,671.53	111,829,671.53
ENERGY NETWORK	09/01/12	QIL	658,332	114.067	114.067	75,093,967.88	75,093,967.88
TALEVERAS	11/01/12	AGBAMI	974,208	109.230	109.230	106,412,739.84	106,412,739.84
CRUDEX	18/01/12	AKPO	996,661	109.180	109.180	108,815,447.98	108,815,447.98

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SAHARA	20/01/12	BONGA	901,938	111.897	111.897	100,924,156.39	100,924,156.39
MASTERS ENERGY	21/01/12	ABO	647,811	110.247	110.247	71,419,219.32	71,419,219.32
ERG	28/01/12	ESL	69,275	111.547	111.547	7,727,418.43	7,727,418.43
BRASKEM	29/01/12	ERHA	997,476	112.297	112.297	112,013,562.37	112,013,562.37
MASTERS ENERGY	29/01/12	OKWORI	300,000	113.511	113.511	34,053,300.00	34,053,300.00
TRAFIGURA	03/02/12	BONGA	952,414	113.996	113.996	108,571,386.34	108,571,386.34
ONTARIO	04/02/12	AGBAMI	974,674	112.011	112.011	109,174,209.41	109,174,209.41
TRAFIGURA	05/02/12	ERHA	996,949	114.461	114.461	114,111,779.49	114,111,779.49
CAMAC	08/02/12	BONGA	997,072	116.776	116.776	116,434,079.87	116,434,079.87
SINOPEC	10/02/12	AKPO	997,058	116.722	116.722	116,378,603.88	116,378,603.88
SOCAR	22/02/12	ESL	73,432	123.620	123.620	9,077,602.03	9,077,602.03
SAHARA	26/02/12	BONGA	967,193	128.104	128.104	123,901,292.07	123,901,292.07
ERG	01/03/12	ERHA	997,251	127.446	127.446	127,095,650.95	127,095,650.95
RHEINOEL	08/03/12	BONGA	901,944	129.485	129.485	116,788,218.84	116,788,218.84
PETROBRAS	10/03/12	AGBAMI	974,242	126.689	126.689	123,425,744.74	123,425,744.74
GLENCORE	13/03/12	BONGA	952,047	127.485	127.485	121,371,711.80	121,371,711.80
HAVISTAR	13/03/12	OKWORI	497,546	127.417	127.417	63,395,818.68	63,395,818.68
CRUDEX	15/03/12	AGBAMI	974,744	125.463	125.463	122,294,306.47	122,294,306.47
SAHARA	15/03/12	ERHA	996,662	127.281	127.281	126,856,136.02	126,856,136.02
GUNVOR	18/03/12	AKPO	996,864	125.108	125.108	124,715,661.31	124,715,661.31
SIERRA LEONE	20/03/12	QIL	658,041	127.085	127.085	83,627,159.17	83,627,159.17
GLENCORE	23/03/12	BONGA	801,686	126.544	126.544	101,448,553.18	101,448,553.18
SINOPEC	23/03/12	ANTAN	947,959	124.944	124.944	118,441,789.30	118,441,789.30
INDIAN OIL	27/03/12	ESL	78,429	123.993	123.993	9,724,646.75	9,724,646.75
BRASKEM	31/03/12	BONGA	997,775	122.235	122.235	121,963,027.13	121,963,027.13
TALEVERAS	12/04/12	AGBAMI	974,842	118.245	118.245	115,270,192.29	115,270,192.29
ZAMBIA	14/04/12	ABO	475,638	118.218	118.218	56,228,973.08	56,228,973.08
COTE D'IVOIRE	15/04/12	BONGA	796,582	119.918	119.918	95,524,520.28	95,524,520.28
TRAFIGURA	16/04/12	ERHA	949,308	119.713	119.713	113,644,508.60	113,644,508.60
INDIAN OIL	18/04/12	QIL	658,209	121.354	121.354	79,876,353.84	79,876,353.84
DELANEY	25/04/12	BONGA	997,552	119.712	119.712	119,418,945.02	119,418,945.02
VERMONT	25/04/12	ESC	71,291	119.212	119.212	8,498,731.13	8,498,731.13
OCEAN BED	28/04/12	OKWORI	548,490	114.276	114.276	62,679,243.24	62,679,243.24
SAHARA	29/04/12	ERHA	949,751	114.876	114.876	109,103,595.88	109,103,595.88
OCEAN BED	11/05/12	ANTAN	498,077	109.415	109.415	54,497,094.96	54,497,094.96
DUKE OIL	12/05/12	BONGA	996,739	111.165	111.165	110,802,490.94	110,802,490.94
NAGARUNA CHRISTLEY	12/05/12	AGBAMI	974,284	108.765	108.765	105,967,999.26	105,967,999.26

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SOCAR TRADING S.A	13/05/12	AKPO	997,016	108.715	108.715	108,390,594.44	108,390,594.44
DELANEY	15/05/12	ERHA	997,944	110.450	110.450	110,222,914.80	110,222,914.80
ENERGY NETWORK	16/05/12	AGBAMI	974,941	109.177	109.177	106,441,133.56	106,441,133.56
RHEINOEL	18/05/12	BONGA	996,538	106.735	106.735	106,365,483.43	106,365,483.43
FUJAIRAH	22/05/12	BONGA	959,679	103.957	103.957	99,765,349.80	99,765,349.80
AZENITH	24/05/12	AKPO	997,076	99.536	99.536	99,244,956.74	99,244,956.74
ERG	25/05/12	ESL	36,439	100.901	100.901	3,676,696.22	3,676,696.22
SAHARA	31/05/12	ERHA	998,346	101.986	101.986	101,817,315.16	101,817,315.16
DUKE OIL	08/06/12	ERHA	725,900	99.643	99.643	72,330,853.70	72,330,853.70
GLENCORE	13/06/12	BONGA	997,189	92.723	92.723	92,462,355.65	92,462,355.65
ENERGY NETWORK	13/06/12	QIL	658,216	92.023	92.023	60,570,985.20	60,570,985.20
SINOPEC	13/06/12	ABO	592,788	90.423	90.423	53,601,669.32	53,601,669.32
TALEVERAS	17/06/12	AKPO	996,956	91.507	91.507	91,228,452.69	91,228,452.69
OCEAN BED	23/06/12	ANTAN	647,428	91.857	91.857	59,470,793.80	59,470,793.80
VITOL	23/06/12	ESL	60,765	94.554	94.554	5,745,598.30	5,745,598.30
VITOL	23/06/12	ESL	10,723	94.554	94.554	1,013,929.11	1,013,929.11
TRAFIGURA	25/06/12	BONGA	951,960	102.801	102.801	97,862,439.96	97,862,439.96
AVIDOR	28/06/12	AGBAMI	974,681	90.023	90.023	87,743,707.66	87,743,707.66
UNICORP	30/06/12	ERHA	945,779	94.107	94.107	89,004,424.35	89,004,424.35
ERG	04/07/12	QIL	69,275	96.561	96.561	6,689,263.28	6,689,263.28
ERG	04/07/12	QIL	346,375	96.561	96.561	33,446,316.38	33,446,316.38
CENTO	05/07/12	ANTAN	648,339	96.587	96.587	62,621,118.99	62,621,118.99
VALESKA TANKERS	08/07/12	BL	904,877	101.695	101.695	92,021,466.52	92,021,466.52
ELAN OIL	09/07/12	AKPO	995,971	99.855	99.855	99,452,684.21	99,452,684.21
SAHARA	15/07/12	BONGA	996,791	102.295	102.295	101,966,735.35	101,966,735.35
ADDAX	17/07/12	OKWORI	398,133	107.000	107.000	42,600,231.00	42,600,231.00
MEZCOR	17/07/12	ERHA	834,008	107.371	107.371	89,548,272.97	89,548,272.97
HAVISTAR	19/07/12	AGBAMI	974,451	102.256	102.256	99,643,461.46	99,643,461.46
GUNVOR	20/07/12	QIL	450,288	108.956	108.956	49,061,524.85	49,061,524.85
MASTERS ENERGY	26/07/12	ESL	33,773	106.687	106.687	3,603,134.50	3,603,134.50
MASTERS ENERGY	26/07/12	ESL	3,906	106.687	106.687	416,723.48	416,723.48
TRAFIGURA	28/07/12	BONGA	952,061	106.429	106.429	101,326,900.17	101,326,900.17
DUKE OIL	31/07/12	ERHA	955,718	115.845	115.845	110,715,151.71	110,715,151.71
SARB ENERGY	05/08/12	QIL	58,884	113.701	113.701	6,695,141.26	6,695,141.26
SARB ENERGY	05/08/12	QIL	311,738	113.701	113.701	35,444,865.49	35,444,865.49
OANDO	08/08/12	ABO	544,332	113.690	113.690	61,885,105.08	61,885,105.08
ONTARIO	12/08/12	AKPO	997,034	111.001	111.001	110,671,771.03	110,671,771.03

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SAHARA	12/08/12	BONGA	952,328	114.351	114.351	108,899,659.13	108,899,659.13
SIERRA LEONE	12/08/12	OKWORI	397,835	115.631	115.631	46,002,058.89	46,002,058.89
ETERNA	14/08/12	QIL	658,271	114.558	114.558	75,410,225.26	75,410,225.26
ELAN OIL	17/08/12	ERHA	955,359	115.393	115.393	110,241,741.09	110,241,741.09
IBETO	17/08/12	ANTAN	664,260	113.793	113.793	75,588,138.18	75,588,138.18
AVIDOR	24/08/12	AKPO	996,891	112.437	112.437	112,087,433.37	112,087,433.37
DUKE OIL	24/08/12	ERHA	949,936	115.837	115.837	110,037,736.43	110,037,736.43
FUJAIRAH	24/08/12	ESL	42,258	115.337	115.337	4,873,882.11	4,873,882.11
COTE D'IVOIRE	27/08/12	BG	952,248	115.293	115.293	109,787,528.66	109,787,528.66
GLENCORE	31/08/12	ERHA	956,019	117.310	117.310	112,150,588.89	112,150,588.89
TALEVERAS	31/08/12	AGBAMI	325,049	112.596	112.596	36,599,217.20	36,599,217.20
TALEVERAS	02/09/12	AGBAMI	649,635	112.646	112.646	73,178,784.21	73,178,784.21
ASTANA ENERGY	03/09/12	ANTAN	616,762	113.787	113.787	70,179,497.69	70,179,497.69
FUJAIRAH	10/09/12	ABO	391,987	110.171	110.171	43,185,599.78	43,185,599.78
DUKE OIL	10/09/12	QIL	484,925	111.371	111.371	54,006,582.18	54,006,582.18
ONTARIO	14/09/12	BG	967,454	112.000	112.000	108,354,848.00	108,354,848.00
SAHARA	15/09/12	QIL	207,825	112.843	112.843	23,451,596.48	23,451,596.48
SAHARA	15/09/12	QIL	69,275	112.843	112.843	7,817,198.83	7,817,198.83
AMG PETROENERGY	18/09/12	ERHA	925,472	111.388	111.388	103,086,475.14	103,086,475.14
OCEAN BED	21/09/12	BL	456,280	111.300	111.300	50,783,964.00	50,783,964.00
MASTERS ENERGY	23/09/12	AGBAMI	944,528	108.500	108.500	102,481,288.00	102,481,288.00
SAHARA	26/09/12	BONGA	867,565	111.488	111.488	96,723,086.72	96,723,086.72
MONCLEAR LTD	27/09/12	AKPO	967,446	108.171	108.171	104,649,601.27	104,649,601.27
ELAN OIL	27/09/12	ESC	29,442	112.556	112.556	3,313,859.68	3,313,859.68
AITEO	04/10/12	QIL	311,738	113.012	113.012	35,230,078.35	35,230,078.35
AITEO	04/10/12	QIL	69,275	113.012	113.012	7,828,906.30	7,828,906.30
AITEO	04/10/12	QIL	207,825	113.012	113.012	23,486,718.90	23,486,718.90
RHEINOEL	06/10/12	OKWORI	397,749	116.204	116.204	46,220,024.80	46,220,024.80
PETROLEOS	06/10/12	ERHA	997,416	115.543	115.543	115,244,436.89	115,244,436.89
DK ENERGY	07/10/12	AKPO	50,000	113.804	113.804	5,690,200.00	5,690,200.00
DK ENERGY	07/10/12	AKPO	965,848	110.455	110.455	106,682,740.84	106,682,740.84
AVIDOR	14/10/12	AGBAMI	944,018	107.173	107.173	101,173,241.11	101,173,241.11
AZENITH	15/10/12	BONGA	967,413	110.233	110.233	106,640,837.23	106,640,837.23
PETRO ENERGY	18/10/12	ABO	395,534	109.077	109.077	43,143,662.12	43,143,662.12
VOYAGE	19/10/12	ANTAN	618,176	107.923	107.923	66,715,408.45	66,715,408.45
TRIDAX	19/10/12	BONGA	922,470	110.970	110.970	102,366,495.90	102,366,495.90
CENTO ENERGY	19/10/12	QIL	83,130	109.823	109.823	9,129,585.99	9,129,585.99

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PETRO ENERGY	21/10/12	BL	194,820	109.823	109.823	21,395,716.86	21,395,716.86
SOCAR	25/10/12	ERHA	794,396	109.763	109.763	87,195,288.15	87,195,288.15
LENGARD PROJECT	27/10/12	AGBAMI	944,409	107.049	107.049	101,098,039.04	101,098,039.04
SAHARA	30/10/12	BG	954,727	110.309	110.309	105,314,980.64	105,314,980.64
ETERNA	05/11/12	ERHA	911,997	111.044	111.044	101,271,794.87	101,271,794.87
TALEVERAS	06/11/12	ABO	387,221	108.530	108.530	42,025,095.13	42,025,095.13
HAVISTAR	13/11/12	ERHA	867,931	111.094	111.094	96,421,926.51	96,421,926.51
LYNEAR	14/11/12	OKWORI	672,258	111.232	111.232	74,776,601.86	74,776,601.86
SINOPEC	26/11/12	QIL	83,130	110.348	110.348	9,173,229.24	9,173,229.24
SINOPEC	26/11/12	QIL	61,655	110.348	110.348	6,803,478.35	6,803,478.35
IBETO	27/11/12	BONGA	897,235	110.298	110.298	98,963,226.03	98,963,226.03
PETROBRAS	28/11/12	AGBAMI	974,587	109.555	109.555	106,770,878.79	106,770,878.79
ASTANA ENERGY	07/12/12	BONGA	852,780	111.257	111.257	94,877,744.46	94,877,744.46
MONCLEAR LTD	08/12/12	ERHA	955,536	111.207	111.207	106,262,291.95	106,262,291.95
SINOPEC	10/12/12	ANTAN	621,410	109.511	109.511	68,051,230.51	68,051,230.51
INDIAN OIL	19/12/12	ESC	140,628	111.372	111.372	15,662,049.46	15,662,049.46
ELAN OIL	24/12/12	AGBAMI	929,897	110.670	110.670	102,911,700.99	102,911,700.99
SOCAR	25/12/12	BONGA	997,570	112.211	112.211	111,938,327.27	111,938,327.27
AMG PETROENERGY	26/12/12	BL	548,559	111.711	111.711	61,280,119.13	61,280,119.13
ETERNA	29/12/12	AKPO	396,991	108.772	108.772	43,181,505.05	43,181,505.05
ETERNA	29/12/12	AKPO	600,000	108.772	108.772	65,263,200.00	65,263,200.00
MEZCOR	29/12/12	ERHA	943,740	114.538	114.538	108,094,092.12	108,094,092.12
OANDO	31/12/12	AGBAMI	974,381	111.225	111.225	108,375,526.73	108,375,526.73
AVIDOR	05/01/13	AGBAMI	974,125	111.391	111.391	108,508,757.88	108,508,757.88
REP OF ZAMBIA	07/01/13	AKPO	994,547	111.664	111.664	111,055,096.21	111,055,096.21
SAHARA	07/01/13	QIL	63,733	114.538	114.538	7,299,850.35	7,299,850.35
TOCOMO	11/01/13	BONGA	997,142	114.141	114.141	113,814,785.02	113,814,785.02
IBETO	15/01/13	ANTAN	593,929	111.626	111.626	66,297,918.55	66,297,918.55
DUKE OIL	16/01/13	ERHA	996,141	117.364	117.364	116,911,092.32	116,911,092.32
VOYAGE	20/01/13	AKPO	995,063	111.391	111.391	110,841,062.63	110,841,062.63
RHEINOEL	23/01/13	BONGA	851,587	114.726	114.726	97,699,170.16	97,699,170.16
CARLSON	26/01/13	ESC	67,474	116.028	116.028	7,828,855.87	7,828,855.87
TRAFIGURA	27/01/13	BONGA	47,500	120.169	120.169	5,708,027.50	5,708,027.50
PPT PUBLIC COY	31/01/13	ERHA	955,246	121.361	121.361	115,929,609.81	115,929,609.81
ONTARIO	31/01/13	AKPO	550,000	116.891	116.891	64,290,050.00	64,290,050.00
ONTARIO	01/02/13	AKPO	445,013	117.719	117.719	52,386,485.35	52,386,485.35
HAVISTAR	01/02/13	ABO	499,445	115.167	115.167	57,519,582.32	57,519,582.32

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HAVISTAR	08/02/13	BB	445,558	119.241	119.241	53,128,781.48	53,128,781.48
CRUDEX	13/02/13	ERHA	956,623	116.755	116.755	111,690,518.37	111,690,518.37
ETERNA	18/02/13	AGBAMI	624,184	111.980	111.980	69,896,124.32	69,896,124.32
VOYAGE	22/02/13	ANTAN	547,589	109.804	109.804	60,127,462.56	60,127,462.56
SINOPEC	24/02/13	ABO	499,273	110.504	110.504	55,171,663.59	55,171,663.59
MERCURIA	25/02/13	BONGA	996,884	112.604	112.604	112,253,125.94	112,253,125.94
TEMPO	26/02/13	BB	136,000	111.837	111.837	15,209,832.00	15,209,832.00
REP OF LIBERIA	01/03/13	OKWORI	397,413	110.447	110.447	43,893,073.61	43,893,073.61
REP OF MALAWI	03/03/13	ERHA	955,890	111.247	111.247	106,339,894.83	106,339,894.83
ASTANA ENERGY	07/03/13	QIL	54,728	110.094	110.094	6,025,196.91	6,025,196.91
ASTANA ENERGY	07/03/13	QIL	90,058	110.094	110.094	9,914,790.41	9,914,790.41
VOYAGE	08/03/13	AKPO	993,512	107.828	107.828	107,128,411.94	107,128,411.94
TALEVERAS	09/03/13	BONGA	952,183	110.028	110.028	104,766,791.12	104,766,791.12
INDIAN OIL	11/03/13	ERHA	996,439	111.124	111.124	110,728,287.44	110,728,287.44
LENGARD PROJECT	12/03/13	ANTAN	535,833	106.480	106.480	57,055,497.84	57,055,497.84
REP OF ZAMBIA	13/03/13	AKPO	996,850	107.419	107.419	107,080,630.15	107,080,630.15
COTE D'IVOIRE	15/03/13	BONGA	951,695	109.978	109.978	104,665,512.71	104,665,512.71
CARLSON	17/03/13	ESL	32,559	109.778	109.778	3,574,289.35	3,574,289.35
CARLSON	17/03/13	ESL	42,258	109.778	109.778	4,638,971.28	4,638,971.28
LYNEAR	24/03/13	AGBAMI	974,327	107.778	107.778	105,011,015.41	105,011,015.41
TRAFIGURA	26/03/13	BONGA	50,000	109.569	109.569	5,478,450.00	5,478,450.00
PTT	27/03/13	BL	340,370	108.960	108.960	37,086,715.20	37,086,715.20
RHEINOEL	28/03/13	ERHA	998,237	105.204	105.204	105,018,525.35	105,018,525.35
PTT	03/04/13	BL	292,307	107.172	107.172	31,327,108.66	31,327,108.66
TEMA	04/04/13	QIL	58,468	101.605	101.605	5,940,651.30	5,940,651.30
DUKE OIL	07/04/13	ERHA	996,240	110.310	110.310	109,895,234.40	109,895,234.40
PETROBRAS	11/04/13	AKPO	966,195	100.055	100.055	96,672,640.73	96,672,640.73
SOCAR	12/04/13	BONGA	997,432	101.658	101.658	101,396,942.26	101,396,942.26
REP OF MALAWI	14/04/13	ANTAN	548,239	103.227	103.227	56,593,067.25	56,593,067.25
ELAN OIL	14/04/13	ABO	499,635	104.227	104.227	52,075,457.15	52,075,457.15
INDIAN OIL	17/04/13	AGBAMI	974,447	102.737	102.737	100,111,761.44	100,111,761.44
CENTO	18/04/13	OKWORI	397,633	102.627	102.627	40,807,881.89	40,807,881.89
ONTARIO	22/04/13	BB	64,940	104.061	104.061	6,757,721.34	6,757,721.34
ONTARIO	22/04/13	BB	32,470	104.061	104.061	3,378,860.67	3,378,860.67
TOCOMO	23/04/13	BONGA	997,639	101.751	101.751	101,510,765.89	101,510,765.89
AVIDOR	24/04/13	ERHA	967,036	101.991	101.991	98,628,968.68	98,628,968.68
SAHARA	26/04/13	QIL	256,318	102.927	102.927	26,381,991.32	26,381,991.32

Investigative Forensic audit of crude oil revenues and remittances by NNPC (January 2012 – July 2013)

SAHARA	26/04/13	QIL	56,113	102.927	102.927	5,775,517.02	5,775,517.02
SINOPEC	28/04/13	BONGA	994,910	104.165	104.165	103,634,800.15	103,634,800.15
TRAFIGURA	03/05/13	ERHA	997,772	106.900	106.900	106,661,826.80	106,661,826.80
OCEAN BED	06/05/13	USAN	396,562	101.066	101.066	40,078,935.09	40,078,935.09
CALSON	06/05/13	ESL	33,945	105.266	105.266	3,573,228.05	3,573,228.05
SAHARA	13/05/13	OKWORI	647,392	106.455	106.455	68,918,115.36	68,918,115.36
AMG PETROENERGY	17/05/13	BG	50,000	105.874	105.874	5,293,700.00	5,293,700.00
AMG PETROENERGY	17/05/13	BONGA	997,699	105.874	105.874	105,630,383.93	105,630,383.93
DK ENERGY	22/05/13	AGBAMI	974,429	103.674	103.674	101,022,952.15	101,022,952.15
HAVISTAR	26/05/13	ABO	399,358	103.224	103.224	41,223,330.19	41,223,330.19
ETERNA	26/05/13	ERHA	995,919	106.054	106.054	105,621,193.63	105,621,193.63
LENGARD PROJECT	29/05/13	QIL	117,768	105.240	105.240	12,393,851.70	12,393,851.70
LENGARD PROJECT	29/05/13	QIL	56,806	105.240	105.240	5,978,210.82	5,978,210.82
LENGARD PROJECT	29/05/13	QIL	18,012	105.240	105.240	1,895,530.26	1,895,530.26
TOCOMO	07/06/13	BG	951,903	105.984	105.984	100,886,487.55	100,886,487.55
VOYAGE	09/06/13	AKPO	997,132	103.808	103.808	103,510,278.66	103,510,278.66
CALSON	14/06/13	ESL	17,874	107.568	107.568	1,922,645.37	1,922,645.37
CALSON	14/06/13	ESL	18,801	107.568	107.568	2,022,411.03	2,022,411.03
GLENCORE	15/06/13	ANTAN	621,607	104.368	104.368	64,875,879.38	64,875,879.38
PTT	20/06/13	AKPO	997,171	105.903	105.903	105,603,400.41	105,603,400.41
REP OF GHANA (T.O.R)	25/06/13	OKWORI	397,075	105.536	105.536	41,905,707.20	41,905,707.20
TRIDAX	26/06/13	QIL	207,825	106.979	106.979	22,232,910.68	22,232,910.68
TRIDAX	26/06/13	QIL	69,275	106.979	106.979	7,410,970.23	7,410,970.23
TRIDAX	26/06/13	QIL	42,951	106.979	106.979	4,594,801.54	4,594,801.54
REP OF SENEGAL	02/07/13	ERHA	827,388	104.900	104.900	86,793,001.20	86,793,001.20
ONTARIO	03/07/13	AGBAMI	972,164	107.324	107.324	104,336,529.14	104,336,529.14
REP OF BURKINA FASO	04/07/13	BG	952,590	106.579	106.579	101,526,089.61	101,526,089.61
CALSON	09/07/13	ESC	34,638	109.038	109.038	3,776,803.73	3,776,803.73
CALSON-Education Tax	09/07/13	ESC	5,901	109.038	109.038	643,433.24	643,433.24
DUKE OIL	20/07/13	QIL	94,907	111.055	111.055	10,539,869.12	10,539,869.12
DUKE OIL	20/07/13	QIL	27,710	111.055	111.055	3,077,334.05	3,077,334.05
COTE D'IVOIRE	22/07/13	OKWORI	397,058	110.466	110.466	43,861,409.03	43,861,409.03
SINOPEC	27/07/13	AKPO	995,835	108.533	108.533	108,080,960.06	108,080,960.06
AVIDOR	27/07/13	BG	952,254	111.505	111.505	106,181,082.27	106,181,082.27
SOCAR	29/07/13	AGBAMI	974,445	108.414	108.414	105,643,480.23	105,643,480.23
ASTANA ENERGY	30/07/13	BL	389,640	110.766	110.766	43,158,864.24	43,158,864.24
FIRS TOTAL			144,811,144			16,004,971,180.61	16,004,971,180.61

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DPR							
COTE D'IVOIRE	02/01/12	BONGA	100,000	110.296	110.296	11,029,600.00	11,029,600.00
ENERGY NETWORK	09/01/12	QIL	175,809	114.067	114.067	20,053,964.71	20,053,964.71
SAHARA	20/01/12	BONGA	50,000	111.897	111.897	5,594,850.00	5,594,850.00
MASTERS ENERGY	21/01/12	ABO	50,000	110.247	110.247	5,512,350.00	5,512,350.00
ERG	28/01/12	ESL	18,500	111.547	111.547	2,063,619.50	2,063,619.50
NAGARJUNA-CHRISTLEY	13/02/12	ANTAN	947,826	118.353	118.353	112,178,050.58	112,178,050.58
SOCAR	22/02/12	ESL	19,610	123.620	123.620	2,424,188.20	2,424,188.20
RHEINOEL	08/03/12	BONGA	50,000	129.485	129.485	6,474,250.00	6,474,250.00
HAVISTAR	13/03/12	OKWORI	150,000	127.417	127.417	19,112,550.00	19,112,550.00
SIERRA LEONE	20/03/12	QIL	175,731	127.085	127.085	22,332,767.15	22,332,767.15
GLENCORE	23/03/12	BONGA	150,000	126.544	126.544	18,981,600.00	18,981,600.00
INDIAN OIL	27/03/12	ESL	20,945	123.993	123.993	2,596,982.55	2,596,982.55
ZAMBIA	14/04/12	ABO	220,000	118.218	118.218	26,007,960.00	26,007,960.00
COTE D'IVOIRE	15/04/12	BONGA	200,000	119.918	119.918	23,983,600.00	23,983,600.00
INDIAN OIL	18/04/12	QIL	175,776	121.354	121.354	21,331,108.57	21,331,108.57
VERMONT	25/04/12	ESC	19,038	119.212	119.212	2,269,599.78	2,269,599.78
OCEAN BED	28/04/12	OKWORI	100,000	114.276	114.276	11,427,600.00	11,427,600.00
OCEAN BED	11/05/12	ANTAN	450,000	109.415	109.415	49,236,750.00	49,236,750.00
ERG	25/05/12	ESL	9,731	100.901	100.901	981,867.63	981,867.63
DUKE OIL	08/06/12	ERHA	220,000	99.643	99.643	21,921,460.00	21,921,460.00
SINOPEC	13/06/12	ABO	100,000	90.423	90.423	9,042,300.00	9,042,300.00
ENERGY NETWORK	13/06/12	QIL	175,778	92.023	92.023	16,175,578.86	16,175,578.86
COTE D'IVOIRE	19/06/12	BG	150,000	92.893	92.893	13,933,950.00	13,933,950.00
OCEAN BED	23/06/12	ANTAN	300,000	91.857	91.857	27,557,100.00	27,557,100.00
VITOL	23/06/12	ESL	16,227	94.554	94.554	1,534,371.25	1,534,371.25
ERG	04/07/12	QIL	18,500	96.561	96.561	1,786,378.50	1,786,378.50
ERG	04/07/12	QIL	92,500	96.561	96.561	8,931,892.50	8,931,892.50
CENTO	05/07/12	ANTAN	300,000	96.587	96.587	28,976,100.00	28,976,100.00
ADDAX	17/07/12	OKWORI	250,000	107.000	107.000	26,750,000.00	26,750,000.00
MEZCOR	17/07/12	ERHA	120,000	107.371	107.371	12,884,520.00	12,884,520.00
GUNVOR	20/07/12	QIL	120,250	108.956	108.956	13,101,959.00	13,101,959.00
MASTERS ENERGY	26/07/12	ESL	9,019	106.687	106.687	962,222.86	962,222.86
SARB ENERGY	05/08/12	QIL	15,725	113.701	113.701	1,787,948.23	1,787,948.23
SARB ENERGY	05/08/12	QIL	83,250	113.701	113.701	9,465,608.25	9,465,608.25
OANDO	08/08/12	ABO	150,000	113.690	113.690	17,053,500.00	17,053,500.00
SAHARA	12/08/12	OKWORI	250,000	115.631	115.631	28,907,750.00	28,907,750.00

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ETERNA	14/08/12	QIL	175,792	114.558	114.558	20,138,379.94	20,138,379.94
IBETO	17/08/12	ANTAN	300,000	113.793	113.793	34,137,900.00	34,137,900.00
FUJAIRAH	24/08/12	ESL	11,285	115.337	115.337	1,301,578.05	1,301,578.05
ASTANA ENERGY	03/09/12	ANTAN	300,000	113.787	113.787	34,136,100.00	34,136,100.00
DUKE OIL	10/09/12	QIL	129,500	111.371	111.371	14,422,544.50	14,422,544.50
SAHARA	15/09/12	QIL	55,500	112.843	112.843	6,262,786.50	6,262,786.50
SAHARA	15/09/12	QIL	18,500	112.843	112.843	2,087,595.50	2,087,595.50
OCEAN BED	21/09/12	BL	134,200	111.300	111.300	14,936,460.00	14,936,460.00
SAHARA	26/09/12	BONGA	100,000	111.488	111.488	11,148,800.00	11,148,800.00
ELAN OIL	27/09/12	ESC	7,863	112.556	112.556	884,971.55	884,971.55
AITEO	04/10/12	QIL	83,250	113.012	113.012	9,408,249.00	9,408,249.00
AITEO	04/10/12	QIL	18,500	113.012	113.012	2,090,722.00	2,090,722.00
AITEO	04/10/12	QIL	55,500	113.012	113.012	6,272,166.00	6,272,166.00
RHEINOEL	06/10/12	OKWORI	250,000	116.204	116.204	29,051,000.00	29,051,000.00
VOYAGE	19/10/12	ANTAN	300,000	107.923	107.923	32,376,900.00	32,376,900.00
CENTO ENERGY	19/10/12	QIL	22,200	109.823	109.823	2,438,070.60	2,438,070.60
PETRO ENERGY	21/10/12	BL	57,300	109.823	109.823	6,292,857.90	6,292,857.90
SOCAR	25/10/12	ERHA	120,000	109.763	109.763	13,171,560.00	13,171,560.00
COTE D'IVOIRE	25/10/12	BG	200,000	111.328	111.328	22,265,600.00	22,265,600.00
HAVISTAR	13/11/12	ERHA	100,000	111.094	111.094	11,109,400.00	11,109,400.00
SINOPEC	26/11/12	QIL	22,200	110.348	110.348	2,449,725.60	2,449,725.60
SINOPEC	26/11/12	QIL	16,465	110.348	110.348	1,816,879.82	1,816,879.82
IBETO	27/11/12	BONGA	100,000	110.298	110.298	11,029,800.00	11,029,800.00
ASTANA ENERGY	07/12/12	BONGA	100,000	111.257	111.257	11,125,700.00	11,125,700.00
SINOPEC	10/12/12	ANTAN	300,000	109.511	109.511	32,853,300.00	32,853,300.00
ESC	19/12/12	ESC	37,555	111.372	111.372	4,182,575.46	4,182,575.46
BL	26/12/12	BL	161,341	111.711	111.711	18,023,564.45	18,023,564.45
SAHARA	07/01/13	QIL	17,020	114.538	114.538	1,949,436.76	1,949,436.76
IBETO	15/01/13	ANTAN	400,000	111.626	111.626	44,650,400.00	44,650,400.00
RHEINOEL	23/01/13	BONGA	100,000	114.726	114.726	11,472,600.00	11,472,600.00
CALSON	26/01/13	ESC	18,019	116.028	116.028	2,090,708.53	2,090,708.53
MONCLER	08/02/13	BONGA	50,000	118.552	118.552	5,927,600.00	5,927,600.00
VOYAGE	22/02/13	ANTAN	400,000	109.804	109.804	43,921,600.00	43,921,600.00
TEMPO	26/02/13	BB	40,000	111.837	111.837	4,473,480.00	4,473,480.00
REP OF LIBERIA	01/03/13	OKWORI	250,000	110.447	110.447	27,611,750.00	27,611,750.00
ASTANA ENERGY	07/03/13	QIL	14,615	110.094	110.094	1,609,023.81	1,609,023.81
ASTANA ENERGY	07/03/13	QIL	24,050	110.094	110.094	2,647,760.70	2,647,760.70

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LENGARD	12/03/13	ANTAN	400,000	106.480	106.480	42,592,000.00	42,592,000.00
CALSON	17/03/13	ESL	8,695	109.778	109.778	954,519.71	954,519.71
CALSON	17/03/13	ESL	11,285	109.778	109.778	1,238,844.73	1,238,844.73
PTT	27/03/13	BL	100,109	108.960	108.960	10,907,854.85	10,907,854.85
PTT	03/04/13	BL	85,973	107.172	107.172	9,213,855.49	9,213,855.49
REP OF GHANA (TEMA)	04/04/13	QIL	15,614	101.605	101.605	1,586,460.47	1,586,460.47
REP OF MALAWI	14/04/13	ANTAN	400,000	103.227	103.227	41,290,800.00	41,290,800.00
CENTO	18/04/13	OKWORI	250,000	102.627	102.627	25,656,750.00	25,656,750.00
ONTARIO	22/04/13	BB	19,100	104.061	104.061	1,987,565.10	1,987,565.10
ONTARIO	22/04/13	BB	9,550	104.061	104.061	993,782.55	993,782.55
SAHARA	26/04/13	QIL	68,450	102.927	102.927	7,045,353.15	7,045,353.15
SAHARA	26/04/13	QIL	14,985	102.927	102.927	1,542,361.10	1,542,361.10
OCEAN BED	06/05/13	USAN	600,000	101.066	101.066	60,639,600.00	60,639,600.00
CALSON	06/05/13	ESL	9,065	105.266	105.266	954,236.29	954,236.29
MONCLER	11/05/13	BONGA	250,000	106.154	106.154	26,538,500.00	26,538,500.00
HAVISTAR	26/05/13	ABO	100,000	103.224	103.224	10,322,400.00	10,322,400.00
LENGARD	29/05/13	QIL	31,450	105.240	105.240	3,309,798.00	3,309,798.00
LENGARD	29/05/13	QIL	15,170	105.240	105.240	1,596,490.80	1,596,490.80
LENGARD	29/05/13	QIL	4,810	105.240	105.240	506,204.40	506,204.40
CALSON	14/06/13	ESL	8,325	107.568	107.568	895,503.60	895,503.60
GLENORE	15/06/13	ANTAN	300,000	104.368	104.368	31,310,400.00	31,310,400.00
OANDO	20/06/13	BG	150,000	104.713	104.713	15,706,950.00	15,706,950.00
REP OF GHANA (T.O.R)	25/06/13	OKWORI	250,000	105.536	105.536	26,384,000.00	26,384,000.00
TRIDAX	26/06/13	QIL	55,500	106.979	106.979	5,937,334.50	5,937,334.50
TRIDAX	26/06/13	QIL	18,500	106.979	106.979	1,979,111.50	1,979,111.50
TRIDAX	26/06/13	QIL	11,470	106.979	106.979	1,227,049.13	1,227,049.13
REP OF SENEGAL	02/07/13	ERHA	150,000	104.900	104.900	15,735,000.00	15,735,000.00
CALSON	09/07/13	ESC	9,250	109.038	109.038	1,008,601.50	1,008,601.50
DUKE OIL	20/07/13	QIL	25,345	111.055	111.055	2,814,688.98	2,814,688.98
DUKE OIL	20/07/13	QIL	7,400	111.055	111.055	821,807.00	821,807.00
COTE D'IVOIRE	22/07/13	OKWORI	250,000	110.466	110.466	27,616,500.00	27,616,500.00
CALSON	24/07/13	USAN	578,651	109.006	109.006	63,076,430.91	63,076,430.91
ASTANA ENERGY	30/07/13	BL	114,600	110.766	110.766	12,693,783.60	12,693,783.60
OCEAN BED	31/07/13	BG	143,250	110.913	110.913	15,888,287.25	15,888,287.25
DPR TOTAL			14,411,415			1,578,108,269.36	1,578,108,269.36
NPDC							
TALEVERAS	25/01/12	FB	906,273	112.470	112.470	101,928,524.31	101,928,524.31

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SAHARA	05/02/12	OKONO	899,351	113.861	113.861	102,401,004.21	102,401,004.21
SAHARA	12/02/12	FB	450,000	121.053	121.053	54,473,850.00	54,473,850.00
SAHARA	12/02/12	FB	455,418	121.053	121.053	55,129,715.15	55,129,715.15
DUKE OIL	15/02/12	FB	28,650	125.485	125.485	3,595,145.25	3,595,145.25
TALEVERAS	22/02/12	FB	905,769	124.920	124.920	113,148,663.48	113,148,663.48
SAHARA	24/02/12	OKONO	899,560	124.966	124.966	112,414,414.96	112,414,414.96
TALEVERAS	15/03/12	OKONO	899,494	126.581	126.581	113,858,850.01	113,858,850.01
SAHARA	17/03/12	FB	219,650	128.066	128.066	28,129,696.90	28,129,696.90
SAHARA	17/03/12	FB	235,885	128.066	128.066	30,208,848.41	30,208,848.41
SAHARA	17/03/12	FB	367,675	128.066	128.066	47,086,666.55	47,086,666.55
DUKE OIL	29/03/12	FB	382,000	127.832	127.832	48,831,824.00	48,831,824.00
SAHARA	06/04/12	OKONO	899,744	119.163	119.163	107,216,194.27	107,216,194.27
SAHARA	13/04/12	FB	186,225	121.018	121.018	22,536,577.05	22,536,577.05
DUKE OIL COMPANY	21/04/12	FB	905,911	121.068	121.068	109,676,832.95	109,676,832.95
SAHARA	27/04/12	OKONO	899,489	114.276	114.276	102,790,004.96	102,790,004.96
SAHARA	29/04/12	FB	105,050	120.594	120.594	12,668,399.70	12,668,399.70
SAHARA	29/04/12	FB	66,850	120.594	120.594	8,061,708.90	8,061,708.90
SAHARA	15/05/12	OKONO	899,953	109.750	109.750	98,769,841.75	98,769,841.75
SAHARA	16/05/12	FB	231,000	110.738	110.738	25,580,478.00	25,580,478.00
SAHARA	16/05/12	FB	711,459	110.738	110.738	78,785,546.74	78,785,546.74
DUKE OIL COMPANY	21/05/12	FB	948,681	106.440	106.440	100,977,605.64	100,977,605.64
SAHARA	18/06/12	FB	948,735	94.674	94.674	89,820,537.39	89,820,537.39
DUKE OIL	28/06/12	FB	150,000	93.523	93.523	14,028,450.00	14,028,450.00
DUKE OIL	07/06/12	FB	60,000	97.583	97.583	5,854,980.00	5,854,980.00
DUKE OIL	07/06/12	FB	497,799	97.583	97.583	48,576,719.82	48,576,719.82
DUKE OIL	07/06/12	FB	390,000	97.583	97.583	38,057,370.00	38,057,370.00
TALEVERAS	11/06/12	OKONO	899,761	93.024	93.024	83,699,367.26	83,699,367.26
DUKE OIL	23/07/12	FB	500,000	111.015	111.015	55,507,500.00	55,507,500.00
SAHARA	23/07/12	OKONO	499,634	106.120	106.120	53,021,160.08	53,021,160.08
DUKE OIL	23/07/12	FB	383,000	115.601	115.601	44,275,183.00	44,275,183.00
SAHARA	14/07/12	FB	949,177	103.095	103.095	97,855,402.82	97,855,402.82
DUKE OIL	23/07/12	FB	90,000	111.015	111.015	9,991,350.00	9,991,350.00
DUKE OIL	23/07/12	FB	100,000	111.015	111.015	11,101,500.00	11,101,500.00
DUKE OIL	23/07/12	FB	225,000	111.015	111.015	24,978,375.00	24,978,375.00
SAHARA	02/08/12	OKONO	899,803	106.941	106.941	96,225,832.62	96,225,832.62
DUKE OIL	04/08/12	FB	948,806	115.151	115.151	109,255,959.71	109,255,959.71
SAHARA	11/08/12	FB	298,511	115.201	115.201	34,388,765.71	34,388,765.71

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SAHARA	11/08/12	FB	650,000	115.201	115.201	74,880,650.00	74,880,650.00
TALEVERAS	21/08/12	OKONO	899,835	115.023	115.023	103,501,721.21	103,501,721.21
DUKE OIL	24/08/12	FB	600,000	116.637	116.637	69,982,200.00	69,982,200.00
SAHARA	06/09/12	OKONO	899,903	115.725	115.725	104,141,274.68	104,141,274.68
DUKE OIL	11/09/12	FB	948,801	112.238	112.238	106,491,526.64	106,491,526.64
SAHARA	16/09/12	FB	377,750	114.243	114.243	43,155,293.25	43,155,293.25
DUKE OIL	22/09/12	FB	373,000	114.055	114.055	42,542,515.00	42,542,515.00
SAHARA	16/09/12	FB	570,000	114.243	114.243	65,118,510.00	65,118,510.00
TALEVERAS	26/09/12	OKONO	899,501	110.588	110.588	99,474,016.59	99,474,016.59
DUKE OIL	15/10/12	FB	824,234	111.133	111.133	91,599,597.12	91,599,597.12
TALEVERAS	16/10/12	OKONO	899,679	109.971	109.971	98,938,599.31	98,938,599.31
DUKE OIL	15/10/12	FB	110,000	111.133	111.133	12,224,630.00	12,224,630.00
DUKE OIL	15/10/12	FB	15,000	111.133	111.133	1,666,995.00	1,666,995.00
TALEVERAS	25/10/12	FB	614,292	110.663	110.663	67,979,395.60	67,979,395.60
TALEVERAS	25/10/12	FB	291,275	110.663	110.663	32,233,365.33	32,233,365.33
SAHARA	31/10/12	FB	905,340	110.956	110.956	100,452,905.04	100,452,905.04
TALEVERAS	05/11/12	OKONO	899,929	110.494	110.494	99,436,754.93	99,436,754.93
DUKE OIL	05/11/12	FB	229,200	112.279	112.279	25,734,346.80	25,734,346.80
DUKE OIL	05/11/12	FB	19,100	112.279	112.279	2,144,528.90	2,144,528.90
TALEVERAS	25/11/12	FB	218,221	112.912	112.912	24,639,769.55	24,639,769.55
TALEVERAS	25/11/12	FB	33,425	112.912	112.912	3,774,083.60	3,774,083.60
TALEVERAS	25/11/12	FB	138,475	112.912	112.912	15,635,489.20	15,635,489.20
TALEVERAS	25/11/12	FB	515,700	112.912	112.912	58,228,718.40	58,228,718.40
SAHARA	26/11/12	OKONO	899,838	110.198	110.198	99,160,347.92	99,160,347.92
DUKE OIL	18/12/12	FB	62,075	115.310	115.310	7,157,868.25	7,157,868.25
DUKE OIL	18/12/12	FB	210,100	115.310	115.310	24,226,631.00	24,226,631.00
DUKE OIL	18/12/12	FB	47,750	115.310	115.310	5,506,052.50	5,506,052.50
DUKE OIL	18/12/12	FB	133,700	115.310	115.310	15,416,947.00	15,416,947.00
DUKE OIL	18/12/12	FB	309,282	115.310	115.310	35,663,307.42	35,663,307.42
OKONO	22/12/12	OKONO	899,764	111.969	111.969	100,745,675.32	100,745,675.32
OKONO	31/12/12	OKONO	435,694	111.222	111.222	48,458,758.07	48,458,758.07
SAHARA	19/01/13	OKONO	899,832	113.591	113.591	102,212,816.71	102,212,816.71
DUKE OIL	22/01/13	FB	19,100	119.919	119.919	2,290,452.90	2,290,452.90
DUKE OIL	22/01/13	FB	38,200	119.919	119.919	4,580,905.80	4,580,905.80
DUKE OIL	22/01/13	FB	391,550	119.919	119.919	46,954,284.45	46,954,284.45
DUKE OIL	22/01/13	FB	218,529	119.919	119.919	26,205,779.15	26,205,779.15
TALEVERAS	05/02/13	OKONO	899,605	118.084	118.084	106,228,956.82	106,228,956.82

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TALEVERAS	20/02/13	FB	160,440	114.357	114.357	18,347,437.08	18,347,437.08
TALEVERAS	20/02/13	FB	400,818	114.357	114.357	45,836,344.03	45,836,344.03
TALEVERAS	20/02/13	FB	178,585	114.357	114.357	20,422,444.85	20,422,444.85
TALEVERAS	20/02/13	FB	147,070	114.357	114.357	16,818,483.99	16,818,483.99
SAHARA	28/02/13	OKONO	899,714	110.577	110.577	99,487,674.98	99,487,674.98
SAHARA	03/03/13	FB	715,624	111.997	111.997	80,147,741.13	80,147,741.13
TALEVERAS	23/03/13	OKONO	899,692	106.851	106.851	96,132,989.89	96,132,989.89
DUKE OIL	17/03/13	FB	68,760	111.155	111.155	7,643,017.80	7,643,017.80
SAHARA	03/03/13	FB	191,000	111.997	111.997	21,391,427.00	21,391,427.00
DUKE OIL	17/03/13	FB	90,725	111.155	111.155	10,084,537.38	10,084,537.38
DUKE OIL	12/04/13	FB	154,000	108.173	108.173	16,658,642.00	16,658,642.00
DUKE OIL	12/04/13	FB	174,000	108.173	108.173	18,822,102.00	18,822,102.00
DUKE OIL	12/04/13	FB	215,000	108.173	108.173	23,257,195.00	23,257,195.00
DUKE OIL	12/04/13	FB	287,000	108.173	108.173	31,045,651.00	31,045,651.00
SAHARA	18/04/13	OKONO	899,436	102.677	102.677	92,351,390.17	92,351,390.17
TALEVERAS	26/04/13	FB	31,515	104.227	104.227	3,284,713.91	3,284,713.91
TALEVERAS	26/04/13	FB	281,725	104.227	104.227	29,363,351.58	29,363,351.58
TALEVERAS	26/04/13	FB	304,168	104.227	104.227	31,702,518.14	31,702,518.14
TALEVERAS	14/05/13	OKONO	899,739	105.209	105.209	94,660,640.45	94,660,640.45
SAHARA	25/05/13	FB	439,333	106.624	106.624	46,843,441.79	46,843,441.79
SAHARA	25/05/13	FB	133,750	106.624	106.624	14,260,960.00	14,260,960.00
SAHARA	25/05/13	FB	334,250	106.624	106.624	35,639,072.00	35,639,072.00
SAHARA	08/06/13	OKONO	899,497	106.438	106.438	95,740,661.69	95,740,661.69
DUKE OIL	21/06/13	FB	360,000	105.740	105.740	38,066,400.00	38,066,400.00
DUKE OIL	21/06/13	FB	41,000	105.740	105.740	4,335,340.00	4,335,340.00
DUKE OIL	21/06/13	FB	60,500	105.740	105.740	6,397,270.00	6,397,270.00
TALEVERAS	04/07/13	FB	948,633	107.429	107.429	101,910,694.56	101,910,694.56
DUKE OIL	08/07/13	FB	286,500	112.223	112.223	32,151,889.50	32,151,889.50
DUKE OIL	08/07/13	FB	485,140	112.223	112.223	54,443,866.22	54,443,866.22
TALEVERAS	16/07/13	OKONO	899,954	110.313	110.313	99,276,625.60	99,276,625.60
SAHARA	18/07/13	FB	131,313	112.534	112.534	14,777,177.14	14,777,177.14
SAHARA	18/07/13	FB	256,895	112.534	112.534	28,909,421.93	28,909,421.93
SAHARA	18/07/13	FB	210,100	112.534	112.534	23,643,393.40	23,643,393.40
SAHARA	18/07/13	FB	308,448	112.534	112.534	34,710,887.23	34,710,887.23
NPDC TOTAL			50,536,316			5,652,259,919.46	5,652,259,919.46
THIRD PARTY FINANCING							
TALEVERAS	25/01/12	FB	949,944	112.922	112.922	107,269,576.37	107,269,576.37

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CALSON	19/02/12	QIL	950,192	122.951	122.951	116,827,056.59	116,827,056.59
NAPOIL	25/03/13	QIL	949,776	127.058	127.058	120,676,639.01	120,676,639.01
CALSON	24/04/12	QIL	949,899	119.413	119.413	113,430,289.29	113,430,289.29
NAPOIL	12/05/12	QIL	950,114	112.692	112.692	107,070,246.89	107,070,246.89
CALSON	22/05/12	QIL	950,314	103.607	103.607	98,459,182.60	98,459,182.60
NAPOIL	09/06/12	QIL	950,020	99.043	99.043	94,092,830.86	94,092,830.86
SAHARA	04/03/13	QIL	912,326	110.624	110.624	100,925,151.42	100,925,151.42
DUKE OIL	22/02/13	QIL	949,926	112.504	112.504	106,870,474.70	106,870,474.70
DUKE OIL	30/03/13	QIL	950,349	109.201	109.201	103,779,061.15	103,779,061.15
CALSON	04/04/13	QIL	950,057	101.208	101.208	96,153,368.86	96,153,368.86
CALSON	08/06/13	QIL	949,803	106.588	106.588	101,237,602.16	101,237,602.16
SAHARA	17/07/13	QIL	997,397	110.316	110.316	110,028,847.45	110,028,847.45
GLENCORE	28/04/12	USAN	997,412	117.880	117.880	117,574,926.56	117,574,926.56
VITOL	08/05/12	USAN	997,445	108.671	108.671	108,393,345.60	108,393,345.60
ASTANA	01/06/12	USAN	997,333	95.082	95.082	94,828,416.31	94,828,416.31
GLENCORE	18/06/12	USAN	996,811	91.634	91.634	91,341,779.17	91,341,779.17
GLENCORE	06/07/12	USAN	995,440	96.407	96.407	95,967,384.08	95,967,384.08
VITOL	30/06/12	USAN	997,278	105.965	105.965	105,676,563.27	105,676,563.27
VITOL	19/08/12	USAN	996,969	111.793	111.793	111,454,155.42	111,454,155.42
SOCAR TRADING	05/09/12	USAN	994,851	112.202	112.202	111,624,271.90	111,624,271.90
TEMPO	22/09/12	USAN	996,066	108.300	108.300	107,873,947.80	107,873,947.80
GLENCORE	10/08/12	USAN	981,869	110.793	110.793	108,784,212.12	108,784,212.12
OTPF TOTAL			22,311,591			2,430,339,329.57	2,430,339,329.57
GRAND TOTAL			615,549,722			68,175,124,209.10	68,208,033,799.53

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6.1.2. Liftings with Valuation Differences

S/N	Customer	Revenue Stream	B/L Date	Pricing Option on schedule	Quantity Lifted (Bbls) (COMD)	Unit Price (\$)	Expected Price	Price Differential (\$)	(Over)/Under Pricing
1	OCEANBED	Equity	26/03/2012	ADVANCED	947,125	116.301	125.816	9.515	9,011,894.38
2	OCEANBED	Equity	20/08/2012	ADVANCED	995,723	105.596	115.181	9.585	9,544,004.96
									18,555,899.34
3	FUJAIRAH	Equity	14/04/2012	DEFERRED	992,051	121.218	122.03	0.812	805,545.41
4	KRPC/WRPC	Domestic - Local refining	7/11/2012	PROMPT	213,912	101.543	104.806	3.263	697,994.86
									1,503,540.27
5	SIR	Domestic - OPA	5/23/2013	DEFERRED	950,435	105.245	106.308	1.063	1,010,312.41
6	KRPC/WRPC	Domestic - Local refining	10/22/2012	DEFERRED	798,933	109.783	109.926	0.143	114,247.42
7	SAHARA	Domestic - Unutilized crude	10/27/2012	ADVANCED	499,389	109.749	109.873	0.124	61,924.24
8	TEMPO	Equity	30/01/2013	PROMPT	949,629	116.606	118.977	2.371	2,251,570.36
9	SIR	Domestic - OPA	6/30/2012	DEFERRED	950,335	93.507	102.095	8.588	8,161,476.98
									11,599,531.59
10	TRAFIGURA	Domestic - SWAP	7/30/2013	ADVANCED	906,088	110.766	112.116	1.35	1,223,218.80
11	TRAFIGURA	Domestic - SWAP	5/20/2013	DEFERRED	949,729	105.485	105.034	-0.451	-428,327.78
12	AITEO	Domestic - SWAP	11/21/2012	ADVANCED	949,566	110.269	110.296	0.027	25,638.28
13	CALSON LTD	Domestic - Unutilized crude	8/29/2012	DEFERRED	995,579	115.373	115.805	0.432	430,090.13
									2,107,274.99
	TOTAL								32,909,590.43

6.1.3. Valuation of extra NPDC Lifting captured by DPR

Month	Year	B/L Date	Crude type	QTY Lifted COMD (bls)	Vessel	Unit price – COMD \$	Crude value \$
January	2012	12/01/12	FB	953,648	PRINCIMAR JOY	107.429	106,661,244.71
February	2012	12/02/12	FB	380,459	GENMAR HARIET G.	107.429	102,449,450.99
April	2012	06/04/12	FB	425,358	MESAIEED	107.429	40,872,329.91
April	2012	28/04/12	FB	398,749	DONAT	107.429	45,695,784.58
May	2012	09/05/12	FB	298,845	SC LAURA	107.429	42,837,206.32
June	2012	13/06/12	FB	1,038,443	CHRYSSI	107.429	32,104,619.51
July	2012	09/07/12	FB	998,752	ARCHANGEL	107.429	111,558,893.05
July	2012	20/07/12	FB	1,049,144	SONANGOL KASSANJE	107.429	107,294,928.61
August	2012	08/08/12	FB	378,502	STENA ANTARTICA	107.429	112,708,490.78
September	2012	04/09/12	FB	449,018	EUROCHAMPION 2004	107.429	40,662,091.36
October	2012	07/10/12	FB	292,458	MESAIEED	107.429	48,237,554.72
December	2012	14/12/12	FB	952,807	DALIAN GLORY	107.429	31,418,470.48
December	2012	20/12/12	FB	285,216	REEF	107.429	102,359,103.20
December	2012	20/12/12	FB	906,027	VADELA	107.429	30,640,469.66
January	2013	13/01/13	FB	95,500	ALEKSEY KOSYGIN	107.429	97,333,574.58
February	2013	01/02/13	FB	238,035	TH SERENADE	107.429	10,259,469.50
February	2013	15/02/13	FB	667,344	SEANOSTRUM	107.429	25,571,862.02
March	2013	12/03/13	FB	434,525	MINDANAO	107.429	71,692,098.58
March	2013	20/03/13	FB	191,000	ORPHEAS	107.429	46,680,586.23
March	2013	24/03/13	FB	237,456	SAMURAI	107.429	20,518,939.00

Month	Year	B/L Date	Crude type	QTY Lifted COMD (bls)	Vessel	Unit price – COMD \$	Crude value \$
April	2013	05/04/13	FB	200000	NIPPON PRINCESS	107.429	25,509,660.62
May	2013	13/05/13	FB	286,500	GRANDY LADY	107.429	21,485,800.00
May	2013	30/05/13	FB	191000	SKS SEGURA	107.429	30,778,408.50
June	2013	14/06/13	FB	143,250	NORDIC PASSAT	107.429	20,518,939.00
TOTAL				11,492,036			1,234,577,935.44

6.1.4. Domestic Remittance for January 2012 to July 2013

Year	Month	90 days credit period	Exchange rate	Expected (\$'000)	Remittance (\$'000)	Remittance (N'000)
2012	1/1/2012	Apr	155.7	1,546,911.27	861,091.22	134,071,903.42
2012	2/1/2012	May	155.4	1,894,330.54	811,792.59	126,152,568.75
2012	3/1/2012	Jun	155.06	1,767,498.41	615,800.56	95,486,034.95
2012	4/1/2012	Jul	154.75	1,515,830.49	886,155.53	137,132,568.75
2012	5/1/2012	Aug	154.7	1,240,597.42	728,600.96	112,714,568.75
2012	6/1/2012	Sep	154.9	985,895.85	719,396.83	111,434,568.75
2012	7/1/2012	Oct	154.87	1,421,165.89	731,145.92	113,232,568.75
2012	8/1/2012	Nov	154.83	1,525,283.05	627,059.15	97,087,568.75
2012	9/1/2012	Dec	154.56	1,773,034.68	726,182.77	112,398,568.75
2012	10/1/2012	Jan	154.75	1,314,880.24	727,209.10	112,535,608.75
2012	11/1/2012	Feb	154.74	1,278,993.32	706,556.60	109,332,568.75
2012	12/1/2012	Mar	154.76	1,883,347.64	821,869.79	127,192,568.75
2013	1/1/2013	Apr	154.77	2,250,793.93	1,178,415.51	182,383,368.75
2013	2/1/2013	May	154.74	1,149,117.13	726,267.09	112,382,568.75
2013	3/1/2013	Jun	154.75	1,730,840.39	726,220.15	112,382,568.75

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Year	Month	90 days credit period	Exchange rate	Expected (\$'000)	Remittance (\$'000)	Remittance (N'000)
2013	4/1/2013	Jul	154.74	1,039,754.82	679,808.51	105,193,568.75
2013	5/1/2013	Aug	154.75	1,321,274.09	752,068.30	116,382,568.75
2013	6/1/2013	Sep	154.75	1,324,140.44	790,840.51	122,382,568.75
2013	7/1/2013	Oct	154.76	1,252,042.08	726,173.23	112,382,568.75
TOTAL				28,215,731.69	14,542,654.33	2,252,261,447.12

6.1.5. FIRS Remittance for the period January 2012 to July 2013

Year	Month	Quantity (bbls)	Sales value (\$'000)	Amount Paid (\$'000)
2012	1/1/2012	7,793,351.00	866,601.78	866,601.67
2012	2/1/2012	5,958,792.00	697,648.95	697,648.91
2012	3/1/2012	10,775,190.00	1,361,148.42	1,361,148.37
2012	4/1/2012	6,421,663.00	760,245.06	760,245.04
2012	5/1/2012	9,427,079.00	1,007,192.03	1,007,191.96
2012	6/1/2012	7,562,385.00	711,035.21	711,035.17
2012	7/1/2012	8,560,059.00	893,112.98	893,112.98
2012	8/1/2012	9,762,441.00	1,116,375.09	1,116,374.98
2012	9/1/2012	7,578,596.00	841,212.38	841,212.30
2012	10/1/2012	9,818,944.00	1,084,556.36	1,084,556.32
2012	11/1/2012	4,856,014.00	536,206.23	536,206.19
2012	12/1/2012	7,961,493.00	885,897.79	885,897.76
2013	1/1/2013	8,086,487.00	926,184.29	926,184.26
2013	2/1/2013	5,150,569.00	587,383.58	587,383.58
2013	3/1/2013	9,368,733.00	1,018,405.99	1,018,405.97
2013	4/1/2013	9,100,021.00	940,889.37	940,890.33
2013	5/1/2013	5,685,660.00	598,291.26	598,291.20
2013	6/1/2013	3,982,762.00	420,726.81	420,726.81
2013	7/1/2013	6,938,679.00	751,857.54	751,857.49

Year	Month	Quantity (bbls)	Sales value (\$'000)	Amount Paid (\$'000)
Total		144,788,918.00	16,004,971.13	16,004,971.29

6.1.6. Summary of cash payments made by NPDC to FIRS

YEAR	MONTH	AMOUNT(\$)	VALUE ON SWIFT	SWIFT DETAIL	SWIFT DETAIL
2012	January	48,000,000	48,000,000	58D:/400216647	13/49973
2012	February	48,000,000	48,000,000	58D:/400216647	13/62151
2012	March	48,000,000	48,000,000	58D:/400216647	13/49973
2012	April	48,000,000	48,000,000	58D:/400216647	13/62151
2012	May	48,000,000	144,000,000	54D/400216647	14/12811
2012	June	48,000,000		54D/400216647	14/12811
2012	July	48,000,000		54D/400216647	14/12811
2012	August	48,000,000	144,000,000	53B:/400216647	14/06406
2012	September	48,000,000		54D/400216647	14/06406
2012	October	48,000,000		54D/400216647	14/06406
2012	November	48,000,000	96,000,000	58D/400216647	14/12794
2012	December	48,000,000		58D/400216647	14/12794
2013	January	41,000,000	287,000,000	53B:/36320321	14/15402
2013	February	41,000,000		53B:/36320321	14/15402
2013	March	41,000,000		53B:/36320321	14/15402
2013	April	41,000,000		53B:/36320321	14/15402
2013	May	41,000,000		53B:/36320321	14/15402
2013	June	41,000,000		53B:/36320321	14/15402
2013	July	41,000,000		53B:/36320321	14/15402
Total		863,000,000	863,000,000		

6.1.7. Summary of cash payments made by NPDC to DPR

Date/Period of Payments	Amount (\$)
3/1/2013	71,539,940
4/1/2013	85,363,271
5/1/2013	60,159,720
6/1/2013	6,834,004
10/1/2013	278,934,251
11/1/2013	215,910,921
2/1/2014	120,249,512
Total	838,991,619

6.1.8. Summary of cash payments made by TEPNG

LIFTING	DATE PAID	AMOUNT(\$)
Lifting 1	5/8/2012	9,735,381.49
Lifting 2	5/22/2012	9,486,592.15
Lifting 3	5/31/2012	9,504,814.11
Lifting 4	6/7/2012	34,479,775.67
Lifting 6	7/3/2012	21,592,900.37
Lifting 7	7/6/2012	1,446,875.51
Lifting 10	8/7/2012	19,093,843.12
Lifting 11	8/22/2012	1,509,688.15

LIFTING	DATE PAID	AMOUNT(\$)
Lifting 13	9/7/2012	26,989,480.03
Lifting 14	9/19/2012	27,428.46
Lifting 15	9/28/2012	1,557,347.97
Lifting 16	10/9/2012	31,694,166.93
Lifting 19	10/30/2012	17,943,616.18
Lifting 20	11/8/2012	26,359,767.19
TOTAL		211,421,677.33

6.1.9. Summary of cash payments made by Mobil Nigeria limited

Description	Date	Mobil Producing Nigeria's submission	Amount Remitted
EXCESS AMOUNT QIT PROJECT	3/15/2012	107,269,576	107,269,576
EXCESS AMOUNT QIT PROJECT	4/16/2012	116,827,057	116,827,057
EXCESS AMOUNT QIT PROJECT	5/15/2012	120,676,639	120,676,639
QIT	6/15/2012	113,430,289	113,430,289
QIT Project	8/15/2012	94,092,831	94,092,831
EXCESS AMOUNT FROM SATELLITE FIELD PROCEEDS	4/15/2013	100,925,151	100,925,151
EXCESS AMOUNT QIT PROJECT	7/16/2012	205,529,429	205,529,429
Total RDP remitted		858,750,972	858,750,972
Monthly distribution	11/15/2012	300,000,000	300,000,000
Total Satellite Field remitted		300,000,000	300,000,000
Total Mobil Payment			1,158,750,972

6.1.10. Equity remittances to CBN/NNPC JP Morgan Account January 2012 – Jul 2013

Year	Months	Amount Due \$'000	Amount Remitted \$'000
2012	Jan-12	874,575	874,575
2012	Feb-12	686,307	686,020
2012	Mar-12	965,824	956,812
2012	Apr-12	697,265	697,264
2012	May-12	806,113	806,113
2012	Jun-12	877,210	877,209
2012	Jul-12	609,068	609,068
2012	Aug-12	866,355	846,355
2012	Sep-12	519,281	496,777
2012	Oct-12	587,012	557,012
2012	Nov-12	855,054	837,554
2012	Dec-12	771,772	769,272
2013	Jan-13	1,117,102	1,111,713
2013	Feb-13	558,455	557,464
2013	Mar-13	531,644	522,108
2013	Apr-13	514,168	506,609
2013	May-13	961,416	957,482
2013	Jun-13	836,933	783,316
2013	Jul-13	658,048	710,256
	Total	14,293,600	14,162,976

6.1.11. Summary of Royalty payments into CBN/DPR JP Morgan Account

Year	Month	Quantity (bbls)	Sales value (\$'000)	Amount Paid (\$'000)
2012	Jan-12	394,309	44,254	44,254
2012	Feb-12	967,436	114,602	114,602
2012	Mar-12	546,676	69,498	69,498
2012	Apr-12	714,814	85,020	61,419
2012	May-12	459,731	50,219	50,219
2012	Jun-12	962,005	90,165	90,164
2012	Jul-12	910,269	93,393	93,393
2012	Aug-12	986,052	112,793	112,790
2012	Sep-12	745,563	83,879	83,879
2012	Oct-12	1,106,750	123,367	123,367
2012	Nov-12	238,665	26,406	26,406
2012	Dec-12	598,896	66,185	66,185
2013	Jan-13	535,039	60,163	60,163
2013	Feb-13	490,000	54,323	54,323
2013	Mar-13	808,754	87,562	87,562
2013	Apr-13	863,672	89,317	86,336
2013	May-13	1,010,495	103,867	103,867
2013	Jun-13	793,795	83,440	83,440
2013	Jul-13	1,278,496	139,655	139,655
Total		14,411,415	1,578,108	1,551,522

6.1.12. Details of unremitted equity revenue

A. Credit Notes utilized

Month	Year	Customer	B/L Date	Crude Type	Quantity Lifted (Bbls)	Value of credit note \$	Credit note number
Jun	2013	VITOL	6/14/2013	EA BLEND	948,568	20,460	031/2012
Jun	2013	FUJAIRAH REFINERY	6/18/2013	QIL	949,960	1,388,837	Several
Apr	2013	ELAN	4/28/2013	BB	429,650	9,840	028/2012
Apr	2013	SOCAR	4/23/2013	QIL	949,740	49,499	029/2012
May	2013	CALSON	5/6/2013	ESC	899,474	1,434,688	Several
Mar	2013	TRAFIGURA	3/26/2013	BONGA	945,980	6,722,305	Several
Mar	2013	FUJAIRAH	3/23/2013	EA BLEND	949,827	181,629	052/2012
Feb	2013	TALEVERAS	2/20/2013	FB	20,055	131,749	022/2011
Mar	2013	DUKE OIL	3/17/2013	FB	317,146	991,526	on system
Jan	2013	TRAFIGURA	1/27/2013	BONGA	901,114	389,615	
Sep	2012	ELAN OIL	9/27/2012	ESC	905,195	3,854	023/2008
Feb	2012	COTE D'IVOIRE(SAHARA)	2/26/2012	BONGA	30,000	64,181	005/2009
Total						11,388,184	

B. Technical cost

Month	Year	Customer	B/L Date	Crude Type	Quantity Lifted (Bbls)	Technical cost \$
Mar	2012	OCEAN BED TRADING LTD	3/26/2012	ZAFIRO	947,125	9,011,894
Total						9,011,894

C. Debt servicing

Month	Year	Customer	B/L Date	Crude Type	Receipt (\$)
Feb	2012	DUKE OIL/PAN OCEAN	2/15/2012	FB	1,999,975
Total					1,999,975

D. Bank charges

Year	Month	Bank charges USD \$
2012	February	25.00
2012	August	71.00
2012	September	110.40
2012	October	28.00
2012	November	140.00
2012	December	81.80
2013	January	53.60
2013	March	40.00
2013	April	70.00
2013	May	20.00
	Total	638.00

E. Initial Funding Deposit

Month	Year	Initial Deposit	Amount in JP Morgan \$
Feb	2012	2,222,959	2,222,959
Aug	2012	20,000,014	20,000,014
Sep	2012	22,500,060	22,500,060
Oct	2012	29,999,979	29,999,979
Nov	2012	17,499,990	17,499,990
Dec	2012	2,500,000	2,500,000
Jan	2013	4,999,975	4,999,975
Mar	2013	2,500,000	2,500,000
Apr	2013	7,500,012	7,500,012
May	2013	2,500,000	2,500,000
Total		112,222,989	112,222,989

GRAND TOTAL (A+B+C+D+E) = \$130,623,730

6.1.13. Summary of the Valuation of Reserves Development Project

Month	Customer	B/L Date	Crude type	QTY Lifted COMD (Bbls)	Crude value COMD \$
Feb-13	DUKE OIL	22/02/13	QIL	949,926	106,870,474.70
Mar-13	DUKE OIL	30/03/13	QIL	950,349	103,779,061.15
Apr-13	CALSON	04/04/13	QIL	950,057	96,153,368.86
May-13	CALSON	08/06/13	QIL	949,803	101,237,602.16
Jun-13	SAHARA	17/07/13	QIL	997,397	110,028,847.45
				4,797,532	518,069,354.325

6.1.14. Satellite Field Development Project

Month	Customer	Crude type	QTY Lifted (Bbls) COMD	Crude value COMD \$
Jan-12	TALEVERAS	FB	949,944	107,269,576.37
Feb-12	CALSON	QIL	950,192	116,827,056.59
Mar-12	NAPOIL	QIL	949,776	120,676,639.01
Apr-12	CALSON	QIL	949,899	113,430,289.29
May-12	NAPOIL	QIL	950,114	107,070,246.89
Jun-12	CALSON	QIL	950,314	98,459,182.60
Jul-12	NAPOIL	QIL	950,020	94,092,830.86
Mar-13	SAHARA	QIL	912,326	100,925,151.42
			7,562,585	858,750,973.03

6.1.15. Summary of the Lifting and Valuation on Usan Project

Month	Customer	B/L Date	Crude type	QTY Lifted (Bbls) COMD	Crude value \$
Apr-12	GLENCORE	28/04/12	USAN	997,412	117,574,926.56
May-12	VITOL	08/05/12	USAN	997,445	108,393,345.60
Jun-12	ASTANA	01/06/12	FB	997,333	94,828,416.31
Jul-12	GLENCORE	18/06/12	USAN	996,811	91,341,779.17
Aug-12	GLENCORE	06/07/12	USAN	995,440	95,967,384.08
Sep-12	VITOL	30/06/12	USAN	997,278	105,676,563.27
Oct-12	VITOL	19/08/12	USAN	996,969	111,454,155.42
Nov-12	SOCAR TRADING	05/09/12	USAN	994,851	111,624,271.90
Dec-12	TEMPO	22/09/12	USAN	996,066	107,873,947.80
Jan-13	GLENCORE	10/08/12	USAN	981,869	108,784,212.12
				9,951,474	1,053,519,002

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6.1.16. Remittances - RDP and SFDP

NARRATION	DATE	MOBIL PRODUCING NIGERIA'S CLAIM	TRACED TO JP MORGAN STATEMENT CBN NNPC CRUDE OIL AND GAS REVENUE ACCOUNT NO. 000000400941775	
EXCESS AMOUNT QIT PROJECT	15-Mar-12	107,269,576.37	15-Mar-12	107,269,576.37
EXCESS AMOUNT QIT PROJECT	16-Apr-12	116,827,056.59	16-Apr-12	116,827,056.59
EXCESS AMOUNT QIT PROJECT	15-May-12	120,676,639.01	15-May-12	120,676,639.01
QIT	15-Jun-12	113,430,289.29	15-Jun-12	113,430,289.29
QIT Project	15-Aug-12	94,092,830.86	15-Aug-12	94,092,830.86
EXCESS AMOUNT FROM SATELITTE FIELD PROCEEDS	15-Apr-13	100,925,151.42	15-Apr-13	100,925,151.42
EXCESS AMOUNT QIT PROJECT	16-Jul-12	205,529,429.49	16-Jul-12	205,529,429.49
TOTAL FROM RDP		858,750,973.03		858,750,973.03
TOTAL FROM SFDP	15-Nov-13	300,000,000.00	15-Nov-13	300,000,000.00

6.1.17. Summary of the Remittances on USAN Project

Lifting	Value date	Royalty Oil(DPR) (US\$)	Tax Oil (FIRS) (US\$)	Profit Oil (NNPC) (US\$)	TOTAL (US\$)	Supporting Documents	Amount in Supporting Documents
Lifting 1	8-May-12	9,735,381.49	0		9,735,381.49	JP Morgan Statement	9,735,381.49
Lifting 2	22-May-12	9,486,592.15	0		9,486,592.15	JP Morgan Statement	9,486,592.14
Lifting 3	31-May-12	9,504,814.11	0		9,504,814.11	JP Morgan Statement	9,504,814.11
Lifting 4	7-Jun-12	34,479,775.67	0		34,479,775.67	JP Morgan Statement	34,479,775.67
Lifting 6	3-Jul-12	21,592,900.37	0		21,592,900.37	JP Morgan Statement	21,592,900.37
Lifting 7	6-Jul-12	1,446,875.51	0		1,446,875.51	JP Morgan Statement	1,446,875.51
Lifting 10	7-Aug-12	19,093,843.12	0		19,093,843.12	JP Morgan Statement	19,093,833.12
Lifting 11	22-Aug-12	1,509,688.15	0		1,509,688.15	JP Morgan Statement	1,509,678.15
Lifting 13	7-Sep-12	26,989,480.03	0		26,989,480.03	JP Morgan Statement	26,989,470.03
Lifting 14	19-Sep-12	27,428.46	0		27,428.46	JP Morgan Statement	27,418.46
Lifting 15	28-Sep-12	1,557,347.97	0		1,557,347.97	JP Morgan Statement	1,557,337.97
Lifting 16	9-Oct-12	31,694,166.93	0		31,694,166.93	JP Morgan Statement	31,694,156.93
Lifting 19	30-Oct-12		0	17,943,616	17,943,616.18	TRACED TO JP MORGAN – CBN NNPC CRUDE OIL AND GAS REVENUE ACCOUNT	17,943,606.18
Lifting 20	8-Nov-12	26,359,767.19			26,359,767.19	JP Morgan Statement	26,359,757.19
		193,478,061.15		17,943,616	211,421,677.33		211,421,597.32

6.1.18. Revised PMS Subsidy Computation Using the Data Submitted to the Senate by DPR, PPPRA & NNPC

Period	Total Volume (Ltrs)	Market Price	Gross Monthly Value of PMS Supplied ₦	Gross Monthly Value of PMS Supplied \$	Gross Derived Monthly Sales Revenue at ₦97 ₦	Gross Derived Monthly Sales Revenue \$	Gross Monthly Subsidy \$
Jan-12	543,709,297.51	147.54	80,218,869,754.63	517,975,526.28	52,739,801,858.47	340,542,402.39	177,433,123.89
Feb-12	728,854,867.49	157.41	114,729,044,691.60	740,808,708.54	70,698,922,146.53	456,504,953.49	284,303,755.05
Mar-12	948,525,524.43	168.91	160,215,446,331.47	1,034,515,699.18	92,006,975,869.71	594,091,663.13	440,424,036.04
Apr-12	783,272,095.00	167.75	131,393,893,936.25	848,414,114.65	75,977,393,215.00	490,588,191.48	357,825,923.17
May-12	837,618,391.66	151	126,480,377,140.66	816,687,396.79	81,248,983,991.02	524,627,003.24	292,060,393.55
Jun-12	724,014,458.26	139.47	100,978,296,493.52	652,019,735.87	70,229,402,451.22	453,473,251.44	198,546,484.42
Jul-12	666,423,419.00	146.12	97,377,789,984.28	628,771,162.81	64,643,071,643.00	417,402,154.34	211,369,008.47
Aug-12	699,690,635.89	158.82	111,124,866,792.05	717,536,429.21	67,869,991,681.33	438,238,468.92	279,297,960.29
Sep-12	808,654,864.84	163.39	132,126,118,366.21	853,142,108.65	78,439,521,889.48	506,486,226.44	346,655,882.20
Oct-12	922,890,926.86	152.01	140,288,649,791.99	905,847,806.50	89,520,419,905.42	578,035,900.47	327,811,906.03
Nov-12	725,595,734.62	143.19	103,898,053,240.24	670,872,688.32	70,382,786,258.14	454,463,655.05	216,409,033.27
Dec-12	1,016,372,449.89	146.59	148,990,037,429.38	962,032,914.25	98,588,127,639.33	636,586,347.51	325,446,566.73
Jan-13	881,867,770.96	152.58	134,555,384,493.08	868,827,949.20	85,541,173,783.12	552,341,794.94	316,486,154.26
Feb-13	880,067,283.34	161.85	142,438,889,808.58	919,731,967.51	85,366,526,483.98	551,214,092.36	368,517,875.15
Mar-13	908,182,082.54	149.57	135,836,794,085.51	877,102,047.43	88,093,662,006.38	568,823,284.09	308,278,763.34
Apr-13	818,506,058.70	143.52	117,471,989,544.62	758,519,981.56	79,395,087,693.90	512,656,342.05	245,863,639.51
May-13	1,012,101,326.00	148.93	150,732,250,481.18	973,282,433.53	98,173,828,622.00	633,911,206.96	339,371,226.57
Jun-13	562,412,173.55	144.33	81,172,949,008.47	524,136,043.19	54,553,980,834.35	352,256,607.70	171,879,435.49
Jul-13	708,316,763.22	150.37	106,509,591,685.39	687,735,466.43	68,706,726,032.34	443,641,286.45	244,094,179.98
	15,177,076,123.76	152.28	2,316,539,293,059.10	14,957,960,179.89	1,472,176,384,004.72	9,505,884,832.47	5,452,075,347.42

6.1.19. Revised DPK Subsidy Computation Using the Data Submitted to the Senate by DPR, PPPRA & NNPC

Period	Total Volume (Ltrs)	Market Price	Gross Monthly Value of DPK Supplied ₦	Gross Monthly Value of DPK Supplied \$	Gross Derived Monthly Sales Revenue at ₦50 ₦	Gross Derived Monthly Sales Revenue \$	Gross Monthly Subsidy \$
Jan-12	183,877,143.30	163.13	29,995,878,386.53	193,684,240.89	9,684,212,044.47	62,531,232.93	131,153,007.96
Feb-12	274,904,739.65	168.69	46,373,680,531.56	299,436,175.71	14,971,808,785.29	96,673,395.66	202,762,780.05
Mar-12	215,879,216.78	172.35	37,206,783,012.03	240,245,257.39	12,012,262,869.51	77,563,523.40	162,681,733.99
Apr-12	330,425,816.34	169.43	55,984,046,062.49	361,490,579.60	18,074,528,979.95	116,707,748.30	244,782,831.29
May-12	196,497,710.64	159.67	31,374,789,457.89	202,587,908.94	10,129,395,447.11	65,405,794.84	137,182,114.10
Jun-12	337,170,800.74	144.75	48,805,473,407.12	315,138,331.55	15,756,916,577.49	101,742,859.03	213,395,472.52
Jul-12	265,492,421.04	151.79	40,299,094,589.66	260,212,401.30	13,010,620,065.11	84,009,944.24	176,202,457.06
Aug-12	311,326,775.76	164.48	51,207,028,077.00	330,645,238.44	16,532,261,921.94	106,749,285.99	223,895,952.44
Sep-12	171,967,117.17	167.8	28,856,082,261.13	186,324,544.85	9,316,227,242.57	60,155,144.59	126,169,400.26
Oct-12	278,503,156.62	165.02	45,958,590,905.43	296,755,930.17	14,837,796,508.50	95,808,074.57	200,947,855.60
Nov-12	259,266,575.57	160.08	41,503,393,417.25	267,988,593.12	13,399,429,656.24	86,520,498.85	181,468,094.28
Dec-12	406,031,346.34	160.48	65,159,910,460.64	420,739,397.31	21,036,969,865.26	135,836,313.46	284,903,083.85
Jan-13	219,401,712.99	164.76	36,148,626,232.23	233,412,708.93	11,670,635,446.58	75,357,625.41	158,055,083.53
Feb-13	299,756,540.16	170.42	51,084,509,574.07	329,854,132.98	16,492,706,648.82	106,493,876.47	223,360,256.51
Mar-13	208,880,635.04	158.06	33,015,673,174.42	213,183,141.82	10,659,157,091.25	68,826,480.86	144,356,660.96
Apr-13	304,166,680.05	149.65	45,518,543,669.48	293,914,532.64	14,695,726,631.85	94,890,725.33	199,023,807.31
May-13	379,289,731.74	148.97	56,502,791,337.31	364,840,132.61	18,242,006,630.50	117,789,156.26	247,050,976.35
Jun-13	163,354,798.99	150.69	24,615,934,659.80	158,945,791.05	7,947,289,552.46	51,315,874.94	107,629,916.11
Jul-13	269,220,103.15	155.5	41,863,726,039.83	270,315,271.13	13,515,763,556.47	87,271,670.15	183,043,600.98
	5,075,413,022.07		811,474,555,255.86	5,239,714,310.43	261,985,715,521.36	1,691,649,225.29	3,548,065,085.13

6.1.20. PMS & DPK Verified and Advised by PPPRA between January 2012 and July 2013

Month of Discharge	PMS		DPK	
	Observed Vol (Ltrs)	Subsidy ₦	Observed Vol (Ltrs)	Subsidy ₦
Jan-12	407,433,337.00	22,027,955,688.21	0.00	0.00
Feb-12	489,423,037.00	26,756,523,036.59	0.00	0.00
Mar-12	627,508,238.00	33,644,546,168.02	0.00	0.00
Apr-12	413,195,138.00	28,035,258,786.17	0.00	0.00
May-12	714,760,739.00	46,638,473,117.48	0.00	0.00
Jun-12	853,015,247.00	53,741,138,969.51	0.00	0.00
Jul-12	503,533,246.00	31,793,318,879.69	0.00	0.00
Aug-12	83,572,259.00	3,304,050,315.07	0.00	0.00
Sep-12	130,829,684.00	6,807,764,097.71	0.00	0.00
Oct-12	92,894,349.00	6,114,387,282.12	0.00	0.00
Nov-12	-	-	0.00	0.00
Dec-12	130,140,028.00	6,285,987,374.87	0.00	0.00
Jan-13	354,418,370.00	16,341,193,976.61	0.00	0.00
Feb-13	180,048,264.00	9,048,503,841.29	0.00	0.00
Mar-13	375,673,951.00	22,407,682,132.83	0.00	0.00
Apr-13	275,587,258.00	13,294,555,310.99	0.00	0.00
May-13	157,915,836.00	6,807,056,025.38	0.00	0.00
Jun-13	50,631,012.00	2,081,440,903.32	0.00	0.00
Jul-13	-	-	0.00	0.00
Over Production	116,219,048.00	6,238,575,255.52	0.00	0.00
Total	5,956,799,041.00	341,368,411,161.38	0.00	0.00
Total in USD @ ₦154.87/\$1		\$2,204,225,551.50	0.00	0.00

6.1.21. PMS & DPK Verified and Advised by PPPRA in 2014

Month of Discharge	PMS		DPK	
	Observed Volume (Ltrs)	Subsidy ₦	Observed Volume (Ltrs)	Subsidy ₦
Jan-12	272,520,295.74	11,713,516,069.03	176,333,337.00	19,044,953,170.65
Feb-12	165,509,078.00	6,825,662,794.94	214,780,693.00	23,587,206,549.27
Mar-12	300,997,037.00	15,800,219,029.19	87,123,463.00	9,817,516,256.49
Apr-12	96,310,559.41	6,390,085,153.04	138,632,095.00	15,936,510,271.12
May-12	143,143,423.00	7,383,420,350.13	125,349,902.00	13,337,220,478.74
Jun-12	128,890,646.00	5,859,691,177.65	227,012,629.00	20,230,744,082.88
Jul-12	234,593,494.00	10,860,427,772.20	273,053,279.00	26,822,781,592.32
Aug-12	554,745,269.00	29,970,882,982.63	237,839,782.00	23,651,146,096.14
Sep-12	652,570,153.00	30,505,772,627.57	144,819,521.00	16,502,616,814.02
Oct-12	743,561,974.00	41,832,655,248.26	234,854,742.00	26,638,990,898.22
Nov-12	769,644,526.00	41,484,625,319.51	290,001,923.00	31,337,659,330.19
Dec-12	819,976,013.00	39,418,978,384.00	400,564,613.00	43,207,424,611.70
Jan-13	526,672,055.00	23,777,263,443.65	260,820,829.00	27,720,141,421.07
Feb-13	532,949,409.00	27,018,242,450.28	276,215,465.00	30,795,546,080.35
Mar-13	500,983,719.00	27,195,738,877.76	209,529,441.00	23,454,585,332.42
Apr-13	497,037,306.00	21,918,182,154.00	324,005,570.00	34,526,112,205.11
May-13	478,340,804.00	20,228,041,212.34	362,229,905.00	35,652,750,367.93
Jun-13	375,895,462.00	15,306,148,448.13	156,282,970.00	15,042,407,271.47
Jul-13	502,467,615.00	22,234,801,142.86	267,072,335.00	26,734,092,366.41
Total in USD @ ₦154.87/1\$	8,296,808,838.15	405,724,354,637.17	4,406,522,494.00	464,040,405,196.50
		2,619,773,711.09		2,996,322,110.13

6.1.22. PMS & DPK Acknowledged and verified in 2014 by PPPRA but yet to be Advised

Month of Discharge	PMS		DPK	
	Observed Volume (Ltrs)	Subsidy ₦	Observed Volume (Ltrs)	Subsidy ₦
Jan-12	21,171,716.00	874,391,870.80	24,521,451.00	2,514,920,014.56
Feb-12	50,639,331.00	2,246,327,376.26	61,782,583.00	6,756,075,691.60
Mar-12	86,608,463.00	4,450,220,104.82	130,973,033.00	14,941,003,438.04
Apr-12	-	-	185,659,661.00	22,379,921,683.78
May-12	18,216,777.00	1,365,529,603.92	66,359,730.00	7,868,040,146.87
Jun-12	24,323,885.00	1,366,029,381.60	94,531,548.00	10,826,326,978.20
Jul-12	18,685,192.00	1,400,641,992.32	58,834,327.00	5,875,094,654.01
Aug-12	65,683,526.00	3,121,878,694.20	61,929,325.00	5,967,905,187.66
Sep-12	63,370,467.00	3,256,884,545.46	18,110,995.00	2,094,672,117.05
Oct-12	79,461,479.00	5,072,712,506.64	67,621,306.00	7,910,092,739.98
Nov-12	21,424,219.00	1,295,736,765.12	6,220,253.00	714,271,651.99

	PMS		DPK	
Dec-12	74,541,409.00	4,376,303,967.13	-	-
Jan-13	151,542,505.00	7,032,058,029.19	6,248,077.00	683,102,258.40
Feb-13	195,663,703.00	9,678,352,396.69	24,962,833.00	2,906,884,234.75
Mar-13	86,221,365.00	5,004,160,899.21	24,147,350.00	2,777,072,195.00
Apr-13	132,421,940.00	6,471,588,740.56	6,139,714.00	649,274,755.50
May-13	332,523,907.00	14,430,554,092.95	-	-
Jun-13	159,475,907.00	7,066,299,518.52	-	-
Jul-13	172,182,256.00	7,960,655,839.06	-	-
	1,754,158,047.00	86,470,326,324.45	838,042,186.00	94,864,657,747.39
Total in USD @ ₦154.87/1\$		558,341,359.36		612,543,796.39

6.1.23. Over Statement of PMS Subsidy by PPPRA

Month	Vessel	NOR	Date of Discharge	Observed Volumes (Ltrs) (A)	PPRA LC ₦	Under Recovery ₦	Amount Due ₦	Official Ex-Depot Price (B) ₦	Ex-Depot Price applied (C) ₦	Error in computation A * (B-C) ₦
Jan-12	MANUELA BOTTIGLIERI	6-Jan-12	8-Jan-12	20,133,747	126.21	76.70	1,544,258,394.90	81.51	49.51	644,279,904
Jan-12	LUCKY SAILOR	4-Jan-12	19-Jan-12	15,667,958	121.52	72.01	1,128,249,655.58	81.51	49.51	501,374,656
Feb-12	AMPHITRITE	3-Feb-12	5-Feb-12	9,379,425	120.15	70.64	662,562,582.00	81.51	49.51	300,141,600
Feb-12	BREEZE	28-Jan-12	1-Feb-12	21,486,392	136.21	86.70	1,862,870,186.40	81.51	49.51	687,564,544
Feb-12	BREEZE	6-Feb-12	11-Feb-12	20,262,425	136.21	86.70	1,756,752,247.50	81.51	49.51	648,397,600
Feb-12	CIELO DI GUANZHOU	31-Jan-12	7-Feb-12	21,197,413	122.81	73.30	1,553,770,372.90	81.51	49.51	678,317,216
Feb-12	GLENDA MERYL	8-Feb-12	11-Feb-12	6,926,589	120.15	70.64	489,294,246.96	81.51	49.51	221,650,848
Feb-12	KRONBORG	8-Feb-12	13-Feb-12	20,527,410	122.89	73.38	1,506,301,345.80	81.51	49.51	656,877,120
Feb-12	OCEAN PEARL	17-Feb-12	23-Feb-12	20,193,296	125.45	75.94	1,533,478,898.24	81.51	49.51	646,185,472
Feb-12	LUCKY SAILOR	23-Feb-12	27-Feb-12	18,675,123	125.45	75.94	1,418,188,840.62	81.51	49.51	597,603,936
				174,449,778			13,455,726,770.90			5,582,392,896

6.1.24. Quarter 4, 2011 Discharges included in the Report of the Senate Committee on Finance on the Investigation of the Alleged Unremitted \$49.8 Billion Oil Revenue by NNPC

	PMS			DPK			Total	Total
	Observed Volume (Ltrs)	Amount Due ₦	Amount Due \$	Observed Volume (Ltrs)	Amount Due ₦	Amount Due \$	Amount Due ₦	Amount Due \$
Oct-11	893,202,980	70,749,719,293.38	456,832,952.11	110,917,296	11,807,475,924.25	76,241,208.27	82,557,195,217.63	533,074,160.38
Nov-11	114,411,007	7,171,281,918.76	46,305,171.56	-	-	-	7,171,281,918.76	46,305,171.56
Dec-11	1,058,411,848	85,687,760,197.63	553,288,307.60	177,039,026	18,869,266,993.59	121,839,394.29	104,557,027,191.22	675,127,701.89
TOTAL	2,066,025,835	163,608,761,409.77	1,056,426,431.26	287,956,322	30,676,742,917.84	198,080,602.56	194,285,504,327.61	1,254,507,033.82

6.1.26 Summary of DPK Purchases from PPMC by Other marketers between January 2012 and July 2013

STS QUANTITY (Metric Tonne)	STS QUANTITY (Litres) (A)
2,992,541.48	3,686,811,097.20

6.1.27. Summary of findings on pipeline maintenance and management costs

S/N	Cost	NNPC's Figure (\$)	Verified Figure (\$)	Variance (\$)
1	Salaries and Upfront benefits (P'MC's Cost)	320,971,870.60	266,292,928.49	54,678,942.11
2	Pipeline Vandalism Repair Cost (PPMC)	11,896,654.70		11,896,654.70
3	Pipeline Surveillance payments	51,562,543.53	3,324,391.39	48,238,152.14
4	Charter Hire Payments	70,571,860.34	11,247,123.33	59,324,737.01
5	Facility Management Expenses	44,098,890.15	17,598,889.74	26,500,000.41
6	NIMASA	1,603,171.89	1,603,171.89	-
7	MT Tuma and MT Olobiri Payments	17,767,683.54	25,224,717.27	(7,457,033.73)
8	Crude Transport Payments	46,265,215.13	40,808,208.15	5,457,006.98
9	Marine and Throughput payments	102,300,848.34	95,593,022.30	6,707,826.05
10	Environmental Remediation Payments	10,899,421.83	642,260.76	10,257,161.07
11	Capital Expenditure (CAPEX)	123,252,435.77	96,073,430.27	27,179,005.48
12	PPMC Charge Out Fees for Management Services	59,712,530.83	-	59,712,530.83
	Casting Error	44,415,284.68	-	44,415,284.68
	TOTAL	905,318,411.34	558,408,143.59	346,910,267.72

6.1.28. Vessels without records of visit to Nigeria per Lloyds Movement Records

6.1.28.1. DPK

S/N	Month Of Discharge	Name Of Mv	B/L Date	Date Of Discharge of one of the shuttle vessel	Shuttle Vessel
1.	Jul-12	Endeavour	28-May-12	11-Jul-12	Sea Voyager Ex Zoja I
2.	Oct-12	Pacific Solarelle	24-Sep-12	9-Nov-12	Zoja I
3.	Aug-12	Energy Pioneer	30-Jul-12	1-Sep-12	Sea Grace
4.	Mar-12	Freja Fiona	30-Jan-12	17-Feb-12	Sea Progress
5.	Jul-12	Klara	29-May-12	10-Jul-12	Sp Atlanta
6.	Aug-12	Aristidis	4-Jul-12	18-Aug-12	Wind Of Grace
7.	Aug-12	Lucky Lady	19-Jul-12	16-Aug-12	Itri
8.	Sep-12	Lucky Lady	15-Sep-12	2-Oct-12	Angel 3 Ex Zoja Ii
9.	Sep-12	Lysias	20-Aug-12	10-Sep-12	Angel 3
10.	Oct-12	Lysias	30-Sep-12	17-Oct-12	Danny Rose
11.	Oct-12	Ns Silver	28-Aug-12	29-Sep-12	Danny Rose

6.1.28.2. PMS

S/N	Vessel	Date of Discharge
1.	Pamir Ex Fair Seas	3-Jan-12
2.	Perla Ex Androussa Ex Alpine Light	21-Feb-12
3.	Torm Alexandra	12-Apr-12
4.	Perla Ex Manuela Bottigillieri	16-Apr-12
5.	Cpo France	29-Jun-12
6.	Rosa Tomasos	13-Aug-12
7.	Torm Charente	25-Aug-12
8.	Farandol	2-Sep-12
9.	Ainazi	4-Sep-12
10.	United Enterprise Ex Torm Hanstorm	6-Sep-12
11.	Risanger	4-Oct-12
12.	Adventure	7-Oct-12
13.	Vegas	12-Oct-12
14.	Torm Gyda	13-Oct-12
15.	Argosy	21-Oct-12

6.1.29. List of sources of vessel tracking checks

1. Thompson Reuters Eikon
2. Lloyds List Intelligence

6.1.30. Details of Discharges verified more than once by PPPRA (as highlighted)

A. PMS

Month	B/L Date	MV BL Qty (MT)	MV BL (Litres)	Vessel	Date of Discharge	Discharge Depot	Observed Vol (Ltrs)	PPRA LC N	Amount due
May-12	1-Apr-12	91,441.490	122,623,038.09	Chance Ex Cape Endless 1	8-May-12	Atlas Cove	22,583,012	156.47	1,692,822,579.52
May-12	1-Apr-12			Lucky Sailor Ex Cape Endless	12-May-12	Atlas Cove Depot	21,255,137	156.47	1,593,285,069.52
Jun-12	1-Apr-12			Chance Ex Cape Endless	24-May-12	NIPCO/Aiteo/MRS	21,126,228	142.96	1,298,206,710.60
Jul-12	1-Apr-12			Ocean Pearl Ex Cape Endless	11-Jul-12	NIPCO	18,404,896	156.47	1,379,631,004.16
Jul-12	1-Apr-12			Ocean Pearl Ex Cape Endless	30-Jun-12	ATLAS COVE	18,685,192	156.47	1,400,641,992.32
May-12	1-Apr-12			Lucky Sailor Ex Cape Endless	21-May-12	FORTE OIL, TOTAL, NIPCO & OANDO	18,216,777	156.47	1,365,529,603.92
Jun-12	1-Apr-12			Lucky Sailor Ex Cape Endless	21-May-12	NIPCO/Total/Forte Oil/Oando	18,216,777	142.96	1,119,420,946.65
		91,441.490	122,623,038.09				138,488,019		9,849,537,906.69
Jun-12	9-Apr-12	38,069.537	51,051,249.12	Navig8 Success	28-May-12	NIPCO/Honeywell Depot	13,803,015	150.93	958,205,301.30
Jun-12	9-Apr-12			Breakthrough Ex Capt Gregory Ex Navig8 Success (1) Sts 24/5/12	1-Jun-12	Fatgbems Depot	6,701,852	153.48	482,332,288.44
Jun-12	9-Apr-12			Capt Gregory Ex Navig8 Success	20-Jun-12	Capital Depot	17,879,088	153.48	1,286,757,963.36
Jun-12	9-Apr-12			Breakthrough Ex Capt Gregory Ex Navig8 Success (3) Sts 12/6/12	24-Jun-12	PPMC Depot Calabar	6,722,038	153.98	487,146,093.86
Jun-12	9-Apr-12			Breakthrough Ex Capt Gregory Ex Navig8 Success Sts 3/6/12	10-Jun-12	Bovas Depot	6,543,163	153.48	470,911,441.11

Investigative Forensic audit of crude oil revenues and remittances by NNPC (January 2012 – July 2013)

Month	B/L Date	MV BL Qty (MT)	MV BL (Litres)	Vessel	Date of Discharge	Discharge Depot	Observed Vol (Ltrs)	PPPRA LC N	Amount due
Jun-12	9-Apr-12			MT BREAKTHROUGH EX CAPTAIN GREGORY Ex Navig8 Success	10-Jun-12	Bovas	6,543,163	153.62	466,155,095.00
		38,069.537	51,051,249.12				58,192,319		4,151,508,183.07
Sep-12	10-Jul-12	32,999.230	44,251,967.43	MT TORM HELLERUP	14-Sep-12	Folawiyo	44,320,751	123.78	1,873,438,144.77
Sep-12	10-Jul-12			MT TORM HELLERUP	14-Nov-12	Nispan	44,320,751	123.78	1,873,438,144.77
		32,999.230	44,251,967.43				88,641,502		3,746,876,289.54

B. DPK

Month of Discharge	Name Of MV	B/L Date	MV BL Quantity (MT)	MV BL Quantity (Litres)	Shuttle Vessel	Date Of Discharge	Discharge Depot	Observed Volume (Litres)	LC ₦	Subsidy Due ₦
Oct 2012	Lysias	30-Sep-12	30,150.65	37,145,601	DANNY ROSE	17-Oct-12	Gulf Treasure	6,039,679	148.11	686,107,534
Oct 2012	Lysias	30-Sep-12			ROSEMARY EX ZOJA-1	23-Oct-12	Heyden Pet Ltd	6,038,542	148.11	685,978,371
Oct 2012	Lysias	30-Sep-12			ROYAL PRIESTHOD	20-Oct-12	Tonimas	6,023,981	148.61	687,336,232
Oct 2012	Lysias	30-Sep-12			SEA PIONEER EX ZOJA-1	6-Nov-12	Intergrated	6,093,065	148.11	692,172,184
Oct 2012	Lysias	30-Sep-12			ZOJA 1	23-Oct-12	Capital	12,181,714	148.11	1,383,842,710
Oct 2012	Lysias	30-Sep-12			ZOJA I	23-Oct-12	Capital Jetty	12,181,714	148.11	1,383,842,710
Oct 2012	Lysias	30-Sep-12			ZOJA I	28-Oct-12	Capital	12,181,714	148.11	1,383,842,710
			30,150.65	37,145,601				60,740,409		6,903,122,453
Feb 2012	Nord Inspiration	30-Nov-11	35,213.89	43,383,512	ITRI ex Zoja 1 ex Gamma Tank	9-Mar-12	Aquitane	6,213,264	144.05	680,600,939
Feb 2012	Ns Spirit ex-Nord Inspiration	30-Nov-11			MT ITRI EX ZOJA I	9-Mar-12	Aquitane	6,213,264	144.05	680,600,939

Investigative Forensic audit of crude oil revenues and remittances by NNPC (January 2012 – July 2013)

Month of Discharge	Name Of MV	B/L Date	MV BL Quantity (MT)	MV BL Quantity (Litres)	Shuttle Vessel	Date Of Discharge	Discharge Depot	Observed Volume (Litres)	LC ₦	Subsidy Due ₦
Feb 2012	Nord Inspiration	30-Nov-11			ORE OFE ex NS Spirit	19-Feb-12	Sea Petroleum	6,202,958	144.05	679,472,019
Feb 2012	Ns Spirit ex-Nord Inspiration	30-Nov-11			MT ORE OFE	19-Feb-12	SPG	6,202,958	144.05	679,472,019
Feb 2012	Nord Inspiration	30-Nov-11			ORE OFE ex Zoja I ex Gamma Tank	7-Apr-12	Honeywell	6,069,209	144.05	664,821,154
Feb 2012	Ns Spirit ex-Nord Inspiration	30-Nov-11			MT ORE OFE EX ZOJA I	7-Apr-12	Honeywell	6,069,209	144.05	664,821,154
Feb 2012	Nord Inspiration	30-Nov-11			SP ATLANTA ex NS Spirit	31-Jan-12	Techno Oil & Gas	6,263,901	144.05	686,147,716
Feb 2012	Ns Spirit ex-Nord Inspiration	30-Nov-11			SP AUCKLAND	27-Jan-12	NIPCO	6,245,182	144.05	684,097,236
Feb 2012	Ns Spirit ex-Nord Inspiration	30-Nov-11			MT VALOR EX ZOJA I	9-Mar-12	Fatgbems	6,212,665	144.05	680,535,324
Feb 2012	Ns Spirit ex-Nord Inspiration	30-Nov-11			NAVIGATOR 1	9-Feb-12	Heyden Dpot, Lagos	6,235,651	144.05	683,053,211
Feb 2012	Jamar ex-Nord Inspiration		35,213.89	43,383,512				49,789,843		6,783,621,710
Feb 2012	Jamar ex-Nord Inspiration	6-Dec -11	36,916.72	45,481,394.11	SP ATLANTA	21-Jan-12	Index Depot	6,180,179	144.04	676,915,005.87
Feb 2012	Jamar ex-Nord Inspiration	6-Dec -11			SAPHINA EX ZOJA I	5-Apr-12	Delmar Storage PH	6,080,169	144.54	669,000,995.07
Feb 2012	Jamar ex-Nord Inspiration	6-Dec -11			BLUE RIVER	22-Feb-12	Zenon	6,170,560	144.04	675,861,436.80
Feb 2012	Nord Inspiration	6-Dec -11			BLUE RIVER ex Jamar	23-Feb-12	Zenon Pet	6,170,560	144.04	675,861,436.80
			36,916.72	45,481,394.11				24,601,468		2,697,638,874.54
Oct 2012	Pacific Solarelle	24-Sep-12	37,893.35	46,684,602	ZOJA I	9-Nov-12	Noj, Apapa	16,039,221	148.37	1,826,225,703
Oct 2012	Pacific Solarelle	24-Sep-12			BLUEGREE N TIGRE	29-Oct-12	Rain oil	6,211,941	148.87	710,397,573
Oct 2012	Pacific Solarelle	24-Sep-12			SP BRUSSEL	3-Nov-12	Ever Oil	6,243,933	148.87	714,056,178

Month of Discharge	Name Of MV	B/L Date	MV BL Quantity (MT)	MV BL Quantity (Litres)	Shuttle Vessel	Date Of Discharge	Discharge Depot	Observed Volume (Litres)	LC ₦	Subsidy Due ₦
					EX ZOJA II					
Oct 2012	Pacific Solarelle	24-Sep-12			FAVOUR EX ZOJA II	4-Nov-12	Delmar	5,055,721	148.87	578,172,254
Oct 2012	Pacific Solarelle	24-Sep-12			MOTHER BENEDICT A EX ZOJA II	16-Nov-12	Northwest	6,350,598	148.87	726,254,387
Oct 2012	Mt Pacific Solarelle	24-Sep-12			MT SEA PIONEER	16-Nov-12	A-Z Storage	6,157,222	148.37	701,061,297
Oct 2012	Pacific Solarelle	24-Sep-12			SEA PIONEER EX ZOJA II	17-Nov-12	A-Z Depot	6,157,222	148.37	701,061,297
			37,893.35	46,684,602				52,215,858		5,957,228,688

6.1.31. Comparison of the Mother Vessel BL Quantity and the Total Observed Volumes

Month of Discharge	Mother Vessel	MV BL Qty (MT)	MV BL Qty (Litres)	Observed Volume (Litres)	Difference (Litres)
Oct-12	Torm Rhone	30,823.86	37,974,993.06	38,025,359.00	(50,365.94)
Aug-12	Amalienborg	29,918.83	36,859,994.86	37,066,074.00	(206,079.14)
Apr-12	Gotland Carolina	27,992.75	34,487,065.54	34,718,378.00	(231,312.46)
Apr-13	Histria Azure	35,129.09	43,279,035.18	43,510,887.00	(231,851.82)
May-13	Mr Sirius	33,886.99	41,748,770.45	42,037,276.00	(288,505.55)
Mar-12	Georgia	28,962.29	35,681,542.51	35,971,943.00	(290,400.49)
Dec-12	Cape Bacton	30,155.77	37,151,912.34	37,462,780.00	(310,867.66)
Mar-12	Oliphant	30,946.40	38,125,966.03	38,466,019.00	(340,052.97)
Oct-12	Ns Silver	34,297.26	42,254,221.86	42,645,240.00	(391,018.14)
Mar-13	Chance	28,997.11	35,724,441.98	36,143,093.00	(418,651.02)
Apr-13	Alkiviadis	25,025.82	30,831,806.54	31,293,394.00	(461,587.46)
May-13	Belaia	30,926.43	38,101,355.60	38,590,929.00	(489,573.40)
Jan-12	Cenito	30,771.00	37,909,867.07	38,585,394.00	(675,526.93)
Dec-12	Glenda Meredith	34,230.84	42,172,388.72	42,934,937.00	(762,548.28)

Investigative Forensic audit of crude oil revenues and remittances by NNPC (January 2012 – July 2013)

Jan-12	Freja Selandia	35,193.36	43,358,215.82	44,182,041.00	(823,825.18)
Jul-13	Gotland Marieann	33,920.57	41,790,137.31	42,869,383.00	(1,079,245.69)
Nov-12	Cape Bruny	30,286.91	37,313,474.35	38,498,248.00	(1,184,773.65)
Apr-12	Port Russel	30,824.72	37,976,050.11	39,298,008.00	(1,321,957.89)
Jan-13	Marios G	33,001.21	40,657,488.26	41,980,176.00	(1,322,687.74)
Jan-13	Torm Agnes	33,546.57	41,329,374.24	42,694,746.00	(1,365,371.76)
Apr-13	Histria Perla	33,634.58	41,437,805.02	43,196,502.00	(1,758,696.98)
May-13	Sea Horizon	27,919.07	34,396,289.31	36,239,368.00	(1,843,078.69)
Jun-12	Agena	33,320.51	41,050,868.32	42,914,800.00	(1,863,931.68)
Mar-12	Freja Fiona	33,427.08	41,182,160.10	43,382,304.00	(2,200,143.90)
Feb-13	Apostolos	27,824.28	34,279,511.73	36,676,258.00	(2,396,746.27)
Jul-13	Manuela Bottiglieri	27,138.57	33,434,723.17	36,032,222.00	(2,597,498.83)
Mar-13	Sea Breeze	37,061.07	45,659,234.54	49,023,796.00	(3,364,561.46)
Jan-12	Torm Esbjerg	27,072.36	33,353,141.36	36,818,328.00	(3,465,186.64)
Feb-13	Alga	32,231.13	39,708,754.62	43,409,762.00	(3,701,007.38)
Oct-12	Pacific Solarelle	37,893.35	46,684,607.20	52,215,858.00	(5,531,250.80)
Jul-12	Endeavour	34,356.72	42,327,474.11	48,737,680.00	(6,410,205.89)
Jul-12	Lysias	33,006.09	40,663,499.18	60,246,748.00	(19,583,248.82)
Dec-12	Lysias	30,020.37	36,985,095.84	66,808,752.00	(29,823,656.16)
Oct-12	Lysias	30,150.65	37,145,600.80	68,608,703.00	(31,463,102.20)
Oct-12	Torm Hellerup	32,696.85	40,282,517.97	72,596,283.00	(32,313,765.03)
May-12	Adamas 1	30,973.04	38,158,788.98	73,537,036.00	(35,378,247.02)
Aug-12	Chance	28,513.89	35,129,116.18	73,140,624.00	(38,011,507.82)
Feb-12	Nord Inspiration	35,213.89	43,383,512.48	92,954,638.00	(49,571,125.52)
			1,479,990,802.75	1,763,513,967.00	(283,523,164.25)

6.1.32. Lifting data from the Pre-shipment Inspection Agencies

		Global Scansystems Technology Ltd	Robinson International Energy Limited	JBIS Integrated Resources Ltd.	Trobell International	Cobalt International Services Ltd	Candidoil Services Limited	Total
Month	Year	Quantity Inspected (bbls)	Quantity Inspected (bbls)	Quantity Inspected (bbls)	Quantity Inspected (bbls)	Quantity Inspected (bbls)	Quantity Inspected (bbls)	Quantity Inspected (bbls)
January	2012	10,230,364	14,439,436	12,276,241	-	5,096,949	-	
February	2012	13,799,475		8,435,136	-	3,730,802	-	
March	2012	12,412,039		11,434,038	-	5,401,936	-	
April	2012	14,389,134	15,552,503	8,778,228	-	1,924,442	-	
May	2012	13,209,754		14,386,283	-	-	-	
June	2012	14,833,764		14,253,154	-	-	-	
July	2012	16,384,156	15,336,137	11,725,599	-	-	-	
August	2012	15,757,121		15,237,503	-	-	-	
September	2012	13,434,572		13,706,668	-	-	-	
October	2012	12,139,343	13,470,300	13,820,513	-	-	-	
November	2012	10,829,288		10,105,458	-	-	-	
December	2012	15,485,209		12,492,606	-	-	-	
January	2013	16,296,142	5,693,151	13,107,642	-	-	-	
February	2013	5,329,514	6,041,282	10,069,288	-	-	-	
March	2013	14,589,348	3,692,289	16,594,362	-	-	-	
April	2013	10,619,254	4,134,364	12,619,977	-	-	-	
May	2013	13,589,340	1,850,174	13,316,644	-	-	-	
June	2013	10,540,908	4,471,253	12,289,720	-	-	-	
July	2013	8,602,829	2,848,335	8,677,975	4,417,995	-	5,196,638	
		242,471,554	87,529,224	233,327,035	4,417,995	16,154,129	5,196,638	589,096,575

6.1.33. List of Bank Accounts reviewed for proceeds of crude oil sales

Revenue stream	Bank details
Equity crude	CBN/NNPC Crude Oil and Gas Revenue JP Morgan Account - 0400941775
Domestic crude	CBN/NNPC Crude Oil Revenue (Naira) Account - 0020151741024
FIRS – PPT	CBN/FIRS PPT JP Morgan Account
DPR – Royalty	CBN/DPR Royalty JP Morgan Account
NPDC - PPT and Royalty	CBN/FIRS PPT JP Morgan Account CBN/DPR Royalty JP Morgan Account"
Third Party Financing - Federation share of profit	CBN/NNPC Crude Oil and Gas Revenue JP Morgan Account – 0400941775


6.2. Exhibits

Exhibit	Description
Exhibit A1	NNPC GMD's Submission to the Senate
Exhibit D1	Joint Submissions of DPR, PPPRA and NNPC to the Senate
Exhibit D2	PPMC's letter of request for import documents waiver
Exhibit D3	PPRA's first response to PPMC on the request for waivers
Exhibit D4	PPRA's consent to grant import documents waiver to PPMC
Exhibit D5	PPRA's letter of acknowledgement of the use of wrong Ex-Depot Price
Exhibit D6	Sample Pro Forma Invoice issued by PPMC for DPK sale offshore Lagos
Exhibit D7	Letter from the Principal Secretary to the President to the National Security Adviser regarding the presidential directive on the stoppage of DPK subsidy to NNPC
Exhibit D8	Letter from the Executive Secretary PPPRA to the CBN Governor confirming the cessation of HHK subsidy grant to NNPC
Exhibit E1	E-mail from DPR to PwC on duplicated NPDC Royalty payment on schedule submitted to the Senate Committee
PMS 1	Lloyds Vessel Report on Pamir
PMS 2	Lloyds Vessel Report on Perla
PMS 3	Lloyds Vessel Report on Torm Alexandra
PMS 4	Lloyds Vessel Report on CPO France
PMS 5	Lloyds Vessel Report on Rosa Tomasos
PMS 6	Lloyds Vessel Report on Torm Charente
PMS 7	Lloyds Vessel Report on Farandol
PMS 8	Lloyds Vessel Report on Ainazi
PMS 9	Lloyds Vessel Report on Torm Hanstholm
PMS 10	Lloyds Vessel Report on Risanger
PMS 11	Lloyds Vessel Report on Adventure

Exhibit	Description
PMS 12	Lloyds Vessel Report on Vegas
PMS 13	Lloyds Vessel Report on Torm Gyda
PMS 14	Lloyds Vessel Report on Argosy
PMS 15	Email confirmation from Lloyds
PMS 16	Perin
PMS 17	Thompson Reuters Eikon Report on Perla
DPK 1	Lloyds Vessel Report on Endeavour
DPK 2	Lloyds Vessel Report on Pacific Solarelle
DPK 3	Lloyds Vessel Report on Energy Pioneer
DPK 4	Lloyds Vessel Report on Freja Fiona (now Seabreeze)
DPK 5	Lloyds Vessel Report on Klara
DPK 6	Lloyds Vessel Report on Aristidis
DPK 7	Lloyds Vessel Report on Lucky Lady
DPK 8	Lloyds Vessel Report on Lysias
DPK 9	Lloyds Vessel Report on NS Silver
Exhibit J1	E-mail correspondence on the summary of meeting held with the former Governor of CBN, now Emir of Kano, HRH Muhammad Sanusi II
Exhibit I1	Copies of Deeds of Assignment for OML's 26,30,40,42
Exhibit I2	Valuation of divested assets by DPR
Exhibit I3	Evidence of payment of \$100 million by NNPC/NPDC out of the DPR assigned value for the divested assets

NB: Exhibits A1, D1, PMS 1 – 17, DPK 1 – 9, and I1 – 3 have been maintained as hard copy exhibits

Exhibit D2 – PPMC’s Letter of request for import documents waiver




PIPELINES AND PRODUCTS MARKETING COMPANY LIMITED
(A Subsidiary of Nigerian National Petroleum Corporation) RC 121776
No 2A, Ikoya Avenue, Off Bourdillon Road, Off Ipeu Street, Ikoyi, Lagos.

A SUBSIDIARY OF NNPC

Cablegram NAPECTOR

Ref: PPMC/S &D/049
Date: 24th September, 2012

The Head
Lagos Zonal Office,
Petroleum Products Pricing Regulatory Agency,
22, Babatunde Jose Street,
Off Adetunkubo Ademola Street,
Victoria Island,
Lagos State.



Name & Sign: *[Signature]*

DISCHARGE DOCUMENTS FOR PMS AND DPK VESSELS THAT COMPLETED DISCHARGE BETWEEN MAY- AUGUST, 2012


We write in respect to our submissions for vessels that completed discharge between May-August, 2012, that were returned from your office.

The reasons for the rejection were that we have to include the additional shipping documents stated in your letter of 5th of September, 2012 and bind each individual delivery irrespective of the number of operations she carried out.

As you are aware, the import vessels that are affected, tendered NOR and completed discharge between April – August 2012 (before your letter of 5th September, 2012), when these additional documentations were not required by PPPRA. Hence our suppliers were not requested to provide them while tendering NOR or after discharge of their vessels.

In view of the lapse of time between these deliveries and when your instruction for new requirements came, we kindly request for a waiver on these vessels that have long completed their discharge and sailed.

However, we shall ensure that all the vessels that arrived after your letter of 5th of September, 2012, comply with the new requirements.



Name & Sign: *[Signature]*

COPY

In light of the foregoing, we hereby re-submit the reports that were earlier returned from your office for your kind consideration.



Yours faithfully,
PIPELINES AND PRODUCTS MARKETING COMPANY LTD


ENGR. K.O.K. OMIOGBEMI
For: MANAGING DIRECTOR

Cc: GM Operations PPPRA, Abuja.

copy

Exhibit D3 - PPPRA's first response to PPMC on the request for waivers



**PETROLEUM PRODUCTS PRICING REGULATORY AGENCY
(PPPRA)
(Ministry of Petroleum Resources)**

Website: www.pppra-nigeria.org

HEAD QUARTERS:
Plot 1012, Cadastral Zone A00,
Central Business District,
P. M. B. 609, Garki,
Abuja.

LAGOS ZONAL OFFICE:
22, Babatunde Jose Street,
(Former Festival Road)
Off Adetokunbo Ademola Street,
P. M. B. 80175, Victoria Island, Lagos.
Zonal e-mail: pppralagoszone@yahoo.com

Ref No.: PPPRA/LZ/IM.77/1/110 October 3, 2012

The Managing Director,
Pipelines and Products Marketing Company Limited
2A, Ikoya Avenue,
Off Bourdillon Road,
Ikoyi, Lagos.

Attention: Manager, Supply and Distribution

Dear Sir,


RE: DISCHARGE DOCUMENTS FOR PMS AND DPK VESSELS THAT COMPLETED DISCHARGE BETWEEN MAY – AUGUST, 2012

We write in reference to your letter Ref. No; PPMC/S&D/049 of 24th September, 2012 on the above subject matter.

2. While appreciating the concern of the PPMC on the issues raised in the referred letter, we equally wish to state that our request was occasioned by the on-going probe on PSF Administration by Investigators appointed by the Government for that purpose. You would recall that prior to the present investigation, the said documents were being overlooked by the Agency but the demand for the documents by the Investigators, have made it more compelling for them to be made available, more so, that they can easily be sourced from the cargo suppliers.

3. We therefore implore the PPMC to contact their supplier(s) to make the documents available for ease of processing all PSF Claims as failure to comply would result in PPPRA not accepting them. Meanwhile, find attached, the checklist for all petroleum products imported under the PSF Scheme for compliance.


4. Kindly accept the warm regards of the Executive Secretary, please.


V.Z. Shidok
AGM/Head, LZ0

*(2) DM Supply
DM Dist
We've agreed.
Kindly line with
staff assigned the responsi-
bility to provide.
15/10/2012
g/a*

*(3) Mr Inana
we have discussed.
Please lets separate the
report on rsl by rsl basis
and use the check list
from PPPRA to identify
if a missing document
Killey
11/10/2012*


Exhibit D4 - PPPRA's consent to grant import documents waiver to PPMC



**PETROLEUM PRODUCTS PRICING REGULATORY AGENCY
(PPPRA)**
(Ministry of Petroleum Resources)

Website: www.pppra-nigeria.org

HEAD QUARTERS:
Plot 1012, Cadastral Zone A00,
Central Business District,
P. M. B. 609, Garki,
Abuja.



LAGOS ZONAL OFFICE:
22, Babatunde Jose Street,
(Former Festival Road)
Off Adetokunbo Ademola Street,
P. M. B. 80175, Victoria Island, Lagos.
Zonal e-mail: pppralagoszone@yahoo.com

Ref No., PPPRA/LZ/IM.29/1/53 November 23rd, 2012

The Managing Director
Pipeline and Products Marketing Corporation (PPMC)
No. 2A, Ikoya Avenue
Ikoyi
Lagos.

ATTENTION: Manager, Supply and Distribution

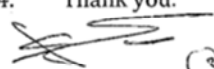
RECONCILIATION OF DOCUMENTS OF VESSELS DISCHARGED UNDER THE PSF SCHEME.

Kindly recall our meeting with some of your staff on 12 November, 2012 on the above subject matter. The meeting was sequel to non-compliance with PPPRA checklist on documents earlier submitted to the office which were rejected.

2. At that meeting with the PPPRA it was resolved that the PPMC should as a matter of necessity, comply with the new checklist and where there are challenges regarding laying hold on documents of vessels that discharged their cargoes prior to the issuance of the new checklist, the PPPRA will consider the submissions on the basis of each transaction with the view to giving a waiver on those documents that are considered not too sensitive.

3. In view of the above, we wish to kindly request that the Manager prevail on the Staff too fast track the collation of all necessary documents and submit same to the Lagos Zonal office to allow early reconciliation, please.

4. Thank you.


V.Z. Shidok
For: Executive Secretary


*Officer Pro
Pls handle and revert
Date 27/11/13*

*DM Supply
Pls take note of *.
Kramm
27/11/12
cc: DM DIST*

*3 Super Pro
we have handled
to PPPRA. Pls Me
Cajoy
07/11/13*

COPY

Exhibit D5 - PPPRA's letter of acknowledgement of the use of wrong Ex-Depot price


Petroleum Products Pricing Regulatory Agency
(MINISTRY OF PETROLEUM RESOURCES)
Office of The Executive Secretary
Plot 1012, Cadastral Zone, A00, Central Business District, P.M.B 609, Garki, Abuja, Nigeria.
+234(0) 929 090 37, +234 (0) 929 003 58. Website: www.ppra-nigeria.org

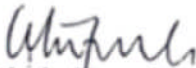
A.4/4/229/C.33/11/2412 **6th May, 2014**

The Group Executive Director, Finance & Accounts
Nigerian National Petroleum Corporation (NNPC)
NNPC Towers, Central Business District
Abuja.

POST AUDIT OF 2012 PMS PAYMENT ADVICE TO NNPC

The Agency wishes to bring to the notice of the Group Executive Director (GED), Finance and Accounts that during the internal post audit of NNPC 2012 PMS payment advice, it was observed that the old ex-depot price of **49.51** was used in computing the subsidy due to NNPC in the January/February, 2012 (Batch B) payment advice instead of the new Ex-depot price of **81.51**.

2. This in effect resulted in a difference of **N5,582,392,896.00 (Five Billion, Five Hundred and Eighty Two Million, Three Hundred and Ninety Two Thousand, Eight Hundred and Ninety Six Naira Only)** which needs to be recovered (See attached table).
3. Kindly note that the above mentioned difference in subsidy reimbursement will be net off in subsequent NNPC submission.
4. Please accept the assurances of my highest esteem.


Farouk A. Ahmed
Executive Secretary

PPRA



MONTHLY PSF VERIFICATION FOR NNPC SUPPLIES (IMPORT & LOCAL)

OVER-PAYMENT (PMS)

(JANUARY 2012)


S/N/Vessel	PDT	Date of Discharge	Port of Discharge	Discharge Point	Observed Volume (cbm)	BS Date	PPRA LC (MmL/D)	Under-Recovery @ NAB.EI Ex Depot (MmL/D)	Amount Advised n/w (₦)	Under-Recovery @ NAB.EI Ex Depot (Corrected MmL/D)	Amount Due n/w (₦)	Difference (₦)	Month of Transaction
1 MT MANUELA BOTTIGLIERI EX MT SUNNY MT AFROCA	PMS	1/8/2012	APAPA	NPCC	20,133,747.00	18-Oct-11	138.21	78.70	1,844,209,394.90	44.70	899,878,490.00	944,379,904.00	JAN 12th
2 MT LUCKY SAILOR EX MT CHANGE	PMS	1/18/2012	APAPA	DANDOMRS/ MOBI/TOTAL	18,887,898.00	28-Oct-11	121.82	72.01	1,128,248,655.58	40.01	628,974,888.58	501,374,866.00	JAN 12th
TOTAL									2,972,458,050.48		1,528,853,378.58	1,443,604,671.90	

(FEBRUARY 2012)

S/N/Vessel	PDT	Date of Discharge	Port of Discharge	Discharge Point	Observed Volume (cbm)	BS Date	PPRA LC (MmL/D)	Under-Recovery @ NAB.EI Ex Depot (MmL/D)	Amount Advised n/w (₦)	Under-Recovery @ NAB.EI Ex Depot (Corrected MmL/D)	Amount Due n/w (₦)	Difference (₦)	Month of Transaction
1 MT AMPHETRITE	PMS	3/5/2012	PWA	MRS/GANDO	8,379,425.00	4-Dec-11	120.15	70.84	882,882,882.00	38.84	362,430,982.00	520,451,900.00	FEB 12th
2 MT BREEZE EX MT TRISTAR KUNAKI EX MT ENJOY (2) 878 38-41-313	PMS	2/1/2012	CAPITAL	JETTY	21,486,362.00	7-Sep-11	138.21	86.70	1,862,870,166.40	84.70	1,178,309,842.40	684,560,324.00	FEB 12th
3 MT BREEZE EX MT TRISTAR KUNAKI EX MT ENJOY (2) 878 08-42-2012	PMS	2/1/2012	CAPITAL	JETTY	20,282,425.00	7-Sep-11	138.21	86.70	1,766,782,247.80	84.70	1,108,384,647.80	658,397,600.00	FEB 12th
4 MT CIELO DI GUANZHOU EX MT TORM MARGHETTE	PMS	2/7/2012	BOF	MOBI/TOTAL/ FORTE OI/COHOLUJ	21,187,413.00	7-Dec-11	122.81	73.30	1,859,770,372.80	41.30	878,453,186.80	981,317,186.00	FEB 12th
5 MT GLENDA MERYL (2)	PMS	2/1/2012	PWA	COHOL/ MRS/GANDOV/ FORTE	8,628,889.00	4-Dec-11	120.15	70.84	489,284,248.80	38.84	267,643,388.80	221,640,860.00	FEB 12th
6 MT KRONBORG	PMS	2/13/2012	BOF	COHOL/ MRS/GANDOV/ FORTE	20,827,610.00	28-Dec-11	122.88	73.38	1,808,301,348.80	41.38	849,424,228.80	958,877,120.00	FEB 12th
7 MT OCEAN PEARL EX MT ORANGE STARS	PMS	2/22/2012	BOF	COHOL/ MRS/GANDOV/ FORTE	20,183,286.00	28-Dec-11	122.48	78.84	1,833,470,108.24	43.84	887,290,428.24	946,179,680.00	FEB 12th
8 MT LUCKY SAILOR EX MT ORANGE STARS	PMS	2/27/2012	PWA	NPCC/ MOBI/ MRS	18,875,123.00	28-Dec-11	126.45	78.84	1,418,188,840.82	43.84	820,584,904.82	597,603,936.00	FEB 12th
TOTAL									10,783,318,720.42		6,345,480,384.42	4,437,838,336.00	
TOTAL OVER-PAYMENT (Jan & Feb 2012)												5,882,392,896.00	

Final Report - A

Exhibit D6 - Sample Pro-forma Invoice issued by PPMC for DPK sale offshore Lagos



PIPELINES AND PRODUCTS MARKETING COMPANY LIMITED
(A Subsidiary of NNPC)

Date: 24/10/2011

To be Completed in four (4) copies

PART A

PROFORMA INVOICE

Name of Company: S.P.O.S. (SEAFARMS) LTD
Address: 5/21, Glover Road, Ikoyi

SEALS & PRODUCTS MARKETING CO. LTD. LAGOS

USED

24/10/2011

1927337

	PMS	AGO	DPK	LPFC
Approved Allocation (Litres or MT)			5,000	
Allocation previously paid for (Litres or MT)				
Allocation to be paid for (Litres or MT)			6,100,000	
Balance of Allocation left (Litres or MT)				

Rate Per Litre: =N= 1240.00
Value (Naira): 6,100,000
Outstanding (Credit/Debit) =N= 6,100,000
Total Amount to be paid =N= 6,100,000
Amount paid =N= 0.00
Credit/Debit Balance =N= 6,100,000
Date of Ordering: 24/10/2011
Name of Vessel to be Loaded: ...
Port of Loading: ...
Completed by: ...
Checked by: ...
Approved by: ...

PART B

PAY ADVICE

Product: ... Quantity in MT: ...
Rate per litre: ... Value =N= ...
Outstanding Balance =N= ...
Credit/Debit Balance =N= ...

Payment

Bank Name and Address	Draft No:	NNPC Receipt No
1. ...		
2. ...		
3. ...		
4. ...		

Prepared by: (Sales) ... Signed by: ...
Draft Received by: (Sales) ...

Exhibit D7 - Letter from the Principal Secretary to the President to the National Security Adviser regarding the presidential directive on the stoppage of DPK subsidy to NNPC

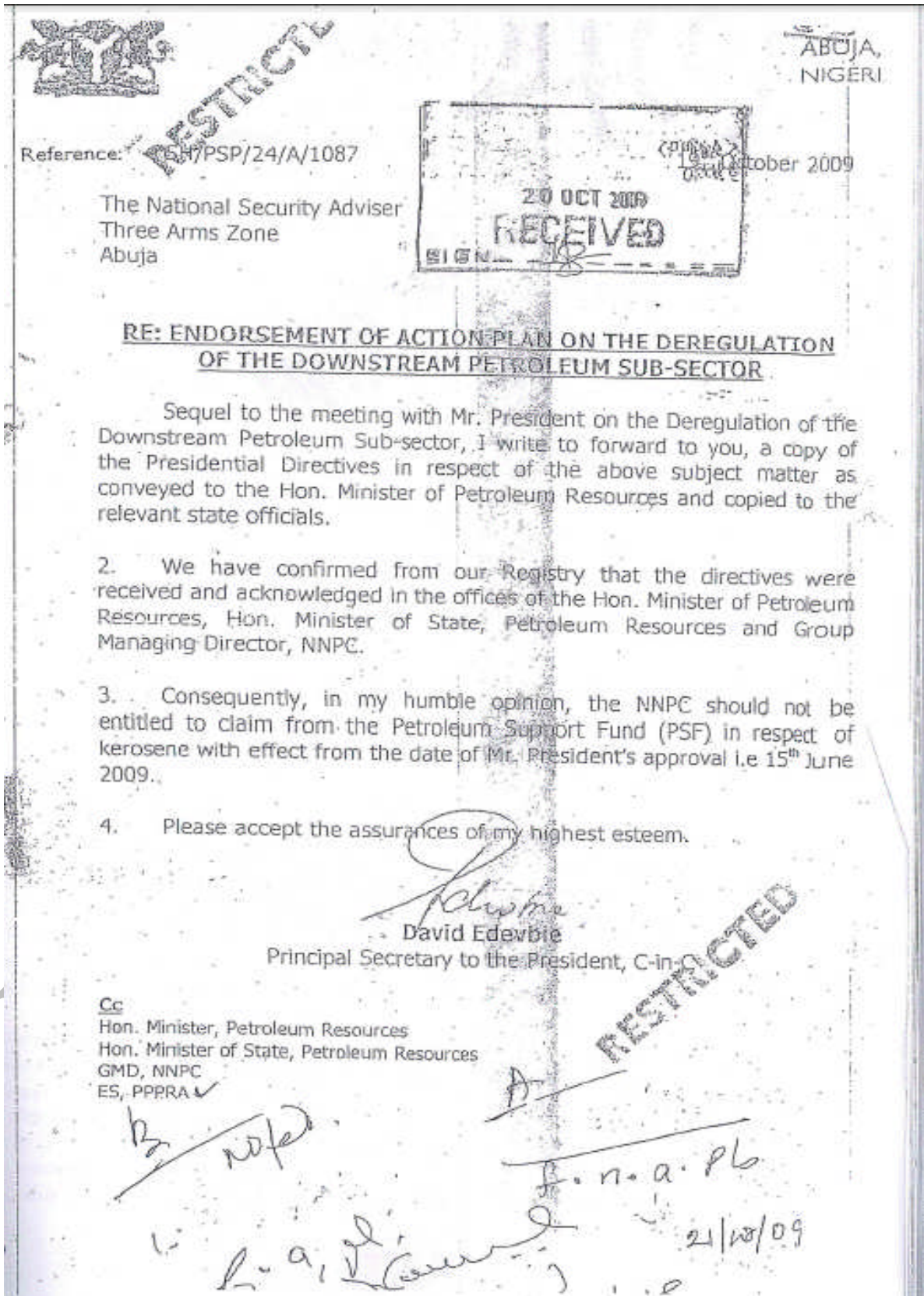



Exhibit D8 - Letter from the Executive Secretary PPPRA to the CBN Governor confirming the cessation of HHK subsidy grant to NNPC



THE PRESIDENCY
PETROLEUM PRODUCTS PRICING REGULATORY AGENCY
Office of The Executive Secretary
Plot 1631, Ankuru Close, off Rimi/Gurara Streets, Maitama, P.M.B. 609, Garki, Abuja.
Tel: 234-9-4138613, 4138614. Fax: 4138654. E-mail: pppra@rosecom.net

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lets meet with them (25)

Sally

Ph review this doc. Sg 2/12

APPENDIX 5



A.3/9/125/C.10/1/201
December 16, 2010

The Governor,
Central Bank of Nigeria,
Central Business District,
Abuja, Nigeria.

Dear Sir,

PETROLEUM PRODUCTS PRICING REGULATORY AGENCY: FACTS ON THE PETROLEUM SUPPORT FUND (PSF) SCHEME ADMINISTRATION.

In the light of the recent disclosures during your visits to the National Assembly, we consider it apposite to shed some light on the Agency's activities with a view to providing relevant information, which could come handy in your future interactions with various Stakeholders in the nation's economy.

In as much as the Management of the Petroleum Products Pricing Regulatory Agency (PPPRA) would not want to engage in issuing rebuttals, it however behoves us, as a responsible government agency, to clarify some of the issues raised at the National Assembly, touching upon our statutory and operational activities, which were sadly misrepresented and given so much negative publicity by the media, thereby casting serious doubts on our transparency as a sensitive organ of government.

It should be placed on record that the PPPRA is an arm of government whose activities have consistently been transparent. Besides the public, the Agency has always made it a deliberate policy to widely share information with the stakeholders, CBN inclusive, hence, the quantum of information made available on its official website. Also, the Governing Board of the Agency is Institution-based, and the Central Bank of Nigeria is a key member. In addition to this, the CBN is among the agencies that collectively administer the PSF

Christiana OGC/14

copy

scheme. Other governmental bodies actively involved in the PSF scheme include: Federal Ministry of Finance (FMF), Nigerian Customs Services, the Nigerian Ports Authority (NPA), Department of Petroleum Resources (DPR), Auditors (Akintola Williams and Deloitte) appointed by the FMF, the Accountant General of the Federation, Budget Office of the Federation (BoF) Nigerian Navy, as well as Independent Surveyors.

It is the expectation of the Agency that this method, in which so many Agencies and Institutions are represented on its Governing Board, would provide the opportunity of checking the veracity, or otherwise, of any information, before it is put in the public domain. However, given the statements attributed to the Central Bank Governor, two major issues warrant clarifications, viz;

- Process of PMS Import Allocations, and
- Process involved in the PSF Scheme administration.

It is necessary to clarify the fact that the PPPRA is only involved in the allocation of PMS and it has ceased to grant subsidy on HHK through a Presidential directive since July 2009.

With respect to product allocation under the PSF, the Agency has been doing this based on the implementation of a guideline put in place and agreed to by all Stakeholders. For the avoidance of doubts, the approved guideline provides for product allocation to Marketers based on proof of ownership of storage tank or evidence of throughput lease agreement, among others.

On pricing, we wish to state that the pricing system for products is uniformly applied and is decipherable from the template, which is in the public domain as displayed on our website. It is therefore a misrepresentation to say that the PPPRA conspires with Marketers, to short-change Nigerians by enforcing higher price regimes. The PPPRA is committed to ensuring fairness among all interested parties in the sector, and particularly, the consumers. Furthermore, since the beginning of the second quarter of 2010, the country has witnessed a stable supply of PMS, and the product has been sold at the regulated price of N65.00 per litre. The Agency's monitoring activities also revealed that there are instances where the product has been sold for less; an indication that some measures put in place by the Agency are effective.

Similarly, on the issue of money spent on subsidy, it is necessary to draw the attention of the CBN Governor to the fact that the total amount so far expended on subsidy since January 2006 till date, is explicitly stated in the table attached, and this has been given the widest circulation to underscore the Agency's belief in transparency.

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The PPPRA wishes to inform the CBN Governor that the current seamless products availability in the country is traceable to the introduction of the Sovereign Debt Instrument (SDI), which has made payment to product suppliers faster than it was in the past. The Central Bank, from the inception of the PSF Scheme, continues to be fully involved in its administration as it disburses the funds to all beneficiaries after due process.

We need to restate once again, the Agency's unwavering commitment to the deregulation policy of government. Indeed, we have consistently made it a duty to drum up support for it in our regular interactions with all Stakeholders and the public in general. Our contention is that the billions of naira which government today expends on subsidy could be put into better use such as provision of the much needed infrastructure, which in the final analysis, would engender economic growth. It is in this regard that the Agency continues to make a strong case for the passing into law of the Petroleum Industry Bill (PIB), because we see this as capable of ensuring the implementation of a successful deregulation policy.

We believe the information in this letter will further assist your office in future interface with Stakeholders on the activities of the PPPRA, and we would be glad to provide further clarifications, as you may require, now and in the future. **Furtherance to this, I shall be most prepared to meet with you, at your earliest convenience, to discuss this and other associated issues affecting the nation's economy.**

Please accept the firm assurances of my highest esteem.



**Abiodun Ibikunle,
Executive Secretary.**

Exhibit E1 - E-mail from DPR to PwC on duplicated NPDC Royalty payment on schedule submitted to the Senate Committee

From: Comfort Ajayi
To: NG/GRM/PwC@EMEA-NG
Date: 10/08/2014 11:52 AM
Subject: Re: NPDC Royalty Payment to DPR

RE: NPDC ROYALTY PAYMENT TO DPR

I hereby refer to your mail received by me today on the above issue.

I wish to confirm to you that DPR have detected the error of recording the amount of USD\$25,825,620.33 as payment for OML 119 and OML 30 respectively for the month of November, 2013.

However, DPR only recorded just USD\$25,825,620.33 as payment for OML119 for November, 2013 against NPDC indebtedness, this does not include the amount recorded as payment for OML 30 because DPR only have just USD\$25,825,620.33 among payments made by NPDC in November, 2013 and this has been receipted accordingly.

Thank you for your observation and cooperation.

Ajayi C.G. (Mrs)

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Exhibit J1 - E-mail correspondence on the summary of meeting held with the former Governor of CBN, now Emir of Kano, HRH Muhammad Sanusi II

From: Lamido Sanusi
To: NG/GRMPwC@EMEA-NG

Date: 11/03/2014 11:54 PM
Subject: Re: CONFIDENTIAL: Project Mercury Meetings

The contents of your email below factually represent our discussions and accurately reflect my views, conclusions and recommendations. Please note these views, conclusions and recommendations were based on the information available to me in my capacity as the Central Bank Governor and it is likely that the provision of any additional information may change some of these conclusions.

I hereby authorise PwC to use the comments below for the purpose of executing their mandate of reconciling the crude oil revenues due to the Federation account. In the event the PwC team requires any further clarification or explanations please feel free to contact me. Barring any further questions from the PwC team, please consider this as my final submission as it relates to this matter

Muhammad Sanusi II
Emir of Kano

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Your Royal Highness,

Thank you for making the time to meet us to discuss your views as it relates to our ongoing mandate of investigating the Crude Oil revenues due to the Federation Accounts.

During our discussion, we (PwC) did not receive any documentation from you. You stated your position as it relates to the crude oil revenues has not change and all documentation available to you were submitted to the Senate committee.

Please review this summary and confirm if it factually represents our discussions. Please feel free to highlight any areas you feel we might have misrepresented or misunderstood. As we mentioned during our meeting, once we receive you confirmation, this email will be included in our records/reports.

We have summarised our discussions with you below.

MEETING SUMMARY

1. **Background:** that as the Central Bank Governor, you alerted the President of the Federal Republic of Nigeria about concerns you had on material and significant differences between the CBN's estimates of what NNPC ought to be remitting to the Federation and actual cash receipts. You requested explanations on these differences as you were of the view that the un remitted amounts were being withheld at NNPC (and NNPC subsidiary agencies) in violation of the Law and the Constitution of the Federal Republic of Nigeria. You advised that NNPC be compelled to desist from this practice.

2. **Key Issues:** on receipt of the reconciliation/explanations given by NNPC and further scrutiny, you raised/highlighted the following concerns;

- that there was a reconciling item relating to subsidies paid for kerosene when no appropriations were made by the National Assembly. That this DPK subsidy deduction is against section 80 of the constitution ie. spending Federation money without appropriation. In addition to the lack of appropriation for DPK subsidy, there was a written Presidential directive to NNPC and the Finance Ministry not to pay kerosine subsidy as it did not reach the intended recipients. PPPRA, the agency legally responsible for paying subsidies complied with the President's order. NNPC which is not allowed to pay subsidies was paying itself billions of dollars without appropriation and in violation of the Presidential directive. As such all the payments for subsidy on DPK were illegal and unconstitutional and should be refunded to the federation account.
- that there was a reconciling item linked to PMS subsidies. You noted during the period in question that the NNPC did not declare any subsidy payments and all submissions to the CBN had Nil returns even though in previous periods NNPC had been declaring these deductions. You therefore raised the question of why NNPC was concealing these deductions from FAAC if they were legitimate
- that the NNPC's practice of deducting subsidies (PMS and DPK) at source is in breach of the PPPRA act and thus, illegal. You mentioned that all subsidies can only be administered as a refund for cost incurred. Your position was the NNPC does not have the power to administer subsidy to itself in-house without any external/independent oversight. NNPC was legally obliged to pay crude sales proceeds to the Federation and claim any legitimate subsidies from PPPRA. You therefore had several questions on this matter. You specifically mentioned if the deductions made were covered by the Provisions for subsidy in the Appropriation Act. You also asked if there were any independent/external reviews to verify the volume of fuel imported and the subsidy amount deducted. Your position was even if the subsidy amount is covered by the budget and the subsidy claims are verified ex post, the up front deductions are illegal and should be stopped. If not appropriated for, the amount should be refunded. If verified in line with PPPRA rules ex post, the amounts should be refunded to Federation and a subsequent claim submitted in accordance with the PPPRA rules.
- that there was little transparency on business transactions between NNPC and NPDC. Taking into account these are revenue generating assets owned by the Federation, you felt this lack of transparency should not exist as no one could see



and/or audit revenues due to the Federation from NPDC. Specifically you argued that the JV equity in these assets belonged to the Federation and the NNPC was simply managing this as an agent. NNPC did not provide any evidence that it had purchased these assets and paid fair value to the federation account. Therefore transferring them to NPDC and further transferring equity crude to private sector partners represented an illegal transfer of revenues from the Federation to NPDC and its partners

- that as at the time you were at the CBN, you felt the explanations and reconciliation provided lacked legal support.
- that assuming all amounts in the reconciliation are correct, your position is the Government should not tolerate any transactions that are illegal and reform is needed to ensure compliance. Also that NNPC should be compelled to refund all illegal deductions to the Federation.
- you emphasised that contrary to general belief, you never said money was stolen. Your submissions focused on unreconciled and unexplained differences which were not remitted, and therefore missing, from the Federation account. You insisted that your statements reflected your conclusions, using evidence available at the time, that money was being illegally withheld by NNPC and not being remitted to the Federation. This practice, you felt, was in violation of the Law and Constitution of the Federal Republic of Nigeria. You remain convinced that the reconciliation provided to you by NNPC only served to prove this point.

3. **Recommendations:** based on the foregoing, you suggested the following recommendations:

- the entire amount NNPC paid itself as DPK subsidy without appropriation be refunded to the Federation account and going forward, this practice should discontinue unless appropriations are made in future budgets and the Presidential directive is reversed
- the entire revenues from crude oil sales relating to Federation equity in JVs transferred to NPDC be refunded to the Federation account. This amount can be adjusted for management fees and any taxes or royalties paid by NPDC or its partners from the SAAs. Going forward if NPDC wishes to retain the assets, NNPC should purchase them from the Federation at a value consistent with the actual market value obtained by the divesting JV partners in the market
- where the amount of subsidy charged for PMS has been confirmed correct and appropriated for, no refund is required. However, if any issues were noted, a refund is required for the any excess and vice versa for any shortfall. Also where NNPC deducted subsidy not appropriated it should be refunded.
- The NNPC be directed to desist from the practice of direct deduction of subsidy from source. The requirements of the PPPRA act should be complied with. Where it is established that there have been excess charges this should be refunded to federation account.

4. In conclusion, You stressed again that your primary concerns remain the need for transparency and accountability by NNPC, quantifying any unremitted balances withheld by NNPC and facilitating the process for NNPC to refund same. You made it clear that your



submissions were based on facts and data available to you at the time and you fully appreciate your conclusions could change as more information is made available subsequent to your departure from the CBN

PricewaterhouseCoopers Nigeria

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6.3. List of Stakeholders & Meetings held

6.3.1. List of Stakeholders

AGENCIES	DESCRIPTION
Central Bank of Nigeria (CBN)	The Central Bank of Nigeria (CBN) is charged with the overall control and administration of the monetary and financial sector policies of the Federal Government. The regulatory mandate of the bank includes ensuring price and monetary stability, issuing legal tender, maintaining the external reserves, promoting a sound financial system and acting as banker to the Federal Government.
Nigerian National Petroleum Corporation (NNPC)	The Nigerian National Petroleum Corporation (NNPC) is the state oil Corporation which was established on April 1, 1977. In addition to its exploration activities, the Corporation was given powers and operational interests in refining, petrochemicals, and products transportation as well as marketing. The Corporation has refineries in Warri, Kaduna and Port Harcourt and took over the 35,000-barrel Shell Refinery established in Port Harcourt in 1965. The NNPC was later commercialized into 12 strategic business units, covering the entire spectrum of oil industry operations: exploration and production, gas development, refining, distribution, petrochemicals, engineering, and commercial investments.
Nigerian Petroleum Development Company (NPDC)	The Nigerian Petroleum Development Company (NPDC) Ltd is a fully-owned subsidiary of the Nigerian National Petroleum Corporation (NNPC) established in 1988 with responsibility for petroleum exploration and production activities. The company engages in oil & gas exploration and production activities in the hydrocarbon-rich regions of coastal Nigeria, both onshore and offshore; and more recently, around Equatorial Guinea. Operations are centered mainly in the Niger Delta and span five states in Nigeria (Edo, Delta, Imo, Bayelsa and Rivers). The activities of the company cover the entire spectrum of the upstream oil and gas business from exploration to abandonment.
Petroleum Products Pricing Regulatory Agency (PPPRA)	PPPRA is an agency of Government responsible for fixing the benchmark prices of petroleum products and regulating and monitoring the transportation and distribution of petroleum products in Nigeria. The functions of the PPPRA include establishing an information data bank to facilitate the making of informed and realistic decisions on pricing policies, moderating volatility in petroleum product prices, establishing code of conduct for operators, maintaining surveillance on key indices and preventing collusion and restrictive trade practices that are harmful to the sector among other things.
Ministry of Petroleum	The Ministry of Petroleum Resources (MPR) has the mandate to initiate policies for the oil and gas sector and supervise the

AGENCIES	DESCRIPTION
Resources (MPR)	implementation of approved policies. The Agencies and Parastatals under the supervision of the Ministry also ensure the execution of the approved policies for the sector. The Ministry has four service departments of Planning Research and Statistics, Finance and Accounts, Human Resources Management and Procurement.
Department of Petroleum Resources (DPR)	The technical arm of the Ministry of Petroleum Resources which has the statutory responsibility of ensuring compliance to petroleum laws, regulations and guidelines in the oil and gas Industry. The DPR ensures compliance with industry regulations; processes applications for licenses, leases and permits, establishes and enforces environmental regulations.
Ministry of Finance (MoF)	The Federal Ministry of Finance has the responsibility for the control and management of the public finance of the Federation. The ministry's functions include formulating policies on fiscal and monetary matters, preparing annual estimates of revenue and expenditure for the Federal Government, managing revenue allocation matters, monitoring revenue from oil and non-oil resources, maintaining adequate foreign exchange reserves and relating with international organizations and financial institutions.
Office of the Accountant General of the Federation (OAGF)	The Office of the Accountant General of the Federation is responsible for the overall management of all receipts and payments of the Federal Republic of Nigeria. The mandate of the OAGF includes supervision of the accounts of MDAs, presenting and publishing statutory financial statements required by the Ministry of Finance, managing federal government investments, maintaining and operating public funds, ensuring revenue monitoring and accounting among other things.
Ministry of Justice (MoJ)	The Federal Ministry of Justice is responsible for ensuring justice for all. It provides a sound legal framework to maintain the rule of law as well as economic and social reform. Other functions include; the prosecution of criminal cases, defense of civil suits, provision of legal advice to government organizations and institutions, drafting of bills, handling of complaints of breaches of citizens' rights, publication of revised laws and white papers
Federal Inland Revenue Service (FIRS)	Federal Inland Revenue Service (FIRS) was established to control and administer the different taxes and laws specified in the First Schedule or other laws made from time to time by the National Assembly or other regulations made thereunder by the Government of the Federation and to account for all taxes collected. FIRS is charged primarily with the responsibility of assessing, collecting and accounting for the various taxes to the Federal Government.
Office of the Auditor-General for the Federation (AuGF)	The Office of the Auditor-General for the Federation is saddled with the following responsibilities; enforcing accountability responsibility in Ministries and Extra-Ministerial Developments, ensuring prudent disbursement and utilization of public funds, manpower resources and other public properties, ensuring regular and prompt audit of all

AGENCIES	DESCRIPTION
	Ministries and Extra-Ministerial Departments, maintaining government auditing standard for public sector audit, maintaining a close understanding with the State and Local Government Auditors-General and ensuring prompt and regular submission of report to the National Assembly.
Nigeria Extractive Industries Transparency Initiative (NEITI)	The Nigeria Extractive Industries Transparency Initiative (NEITI) is an Agency charged with the responsibility, among other things, of the development of a framework for transparency and accountability in the reporting and disclosure by all extractive industry companies of revenues due to or paid to the Government of Nigeria.
Petroleum Products Marketing Company (PPMC)	PPMC is a subsidiary of NNPC tasked with ensuring the supply of petroleum products to the domestic market at low operating costs. In the crude oil sales value chain, it is responsible for: <ul style="list-style-type: none"> • Managing the conversion of the 445,000 bbd allocated to the NNPC for domestic use into refined products. • Selling the refined products and paying the revenues realized into the NNPC's accounts
Crude Oil Marketing Division (COMD)	COMD is a strategic business unit within the NNPC. It is responsible for administering the various processes by which Nigerian Crude Oil is exported. In the crude oil value chain it is responsible for: <ul style="list-style-type: none"> • Determination of quantity of crude available for export • Allocation of crude oil cargoes to traders • Valuation of the cargoes • Reconciling and recording of payments made in respect of the cargoes • Preparation of FAAC submissions

6.3.2. Meetings Held

Meetings held and names of attendees

S/N	Meetings held	Date	Attendees and Designation
1	Meeting with the Group Executive Director, Finance & Accounts	20 June 2014	<ul style="list-style-type: none"> Mr Bernard Otti, Group Executive Director, Finance & Accounts
2	Meeting with the Coordinating Minister of the Economy and the Honourable Minister of Finance	22 June 2014	<ul style="list-style-type: none"> Mrs Ngozi Okonjo-Iweala, CME and Honourable Minister of Finance
3	Meeting with representatives of Petroleum Product Pricing Regulatory Agency (PPPRA)	23 June 2014	<ul style="list-style-type: none"> Assistant General Manager, Operations PPPRA, Mr V Z Shidok Head Import Operations PPPRA, Mr George Nwatarah
4	Meeting with Revenue and Investment Department of Office of the Accountant General of the Federation	23 June 2014	<ul style="list-style-type: none"> Sabo Mohammed, Revenue and Investment Department Umaru Hassan, Revenue and Investment Department Bily Kongha, Revenue and Investment Department Susarumso Jaced E, Revenue and Investment Department
5	Meeting with the Chairman of Revenue Mobilization Allocation & Fiscal Commission "RMAFC"	24 June 2014	<ul style="list-style-type: none"> Engineer Elias Mbam, Chairman, RMAFC Shettima Umar A B, Commissioner, RMAFC Bappa D Isa, Ag. Director, Allocation, RMAFC Uche Nwagbara, Director, Oil & Gas, RMAFC Dr Friday Eguche, Director, RMAFC Vincent Nkwede, Special Assistant to the Chairman, RMAFC
6	Meeting with Senior Technical Assistant to the Group Managing Director of NNPC,	27 June 2014	<ul style="list-style-type: none"> Mr Yusuf S Matashi, Senior Technical Assistant to the former Group Managing Director of NNPC, Mr. Andrew Yakubu

S/N	Meetings held	Date	Attendees and Designation
7	Meeting with Executive Secretary, Nigerian Extractive Industries Transparency Initiative "NEITI"	2 July 2014	<ul style="list-style-type: none"> • Zainab Ahmed, Executive Secretary • Usman Abdulrahim, Team Leader, Internal Audit • Garba Sa'idu Yakawada, Team Leader, Audit Technical
8	Meeting with representatives of Federal Inland Revenue Services	2 July 2014	<ul style="list-style-type: none"> • Head, Field Operations, Mr Bamidele • Staff of Field Operations, Mr Ben Pever • Mrs. Adeniran, Director, Large Tax Oil & Gas Payers Department • Mr. Elijah Archibong, Assistant Director, Large Tax Oil & Gas
9	Meeting with the former General Managing Director of NNPC	8 July 2014	<ul style="list-style-type: none"> • Mr Andrew Yakubu, Former Group Managing Director, NNPC • Bola Afolabi, Group General Manager/SAP, NNPC • Bernard Otti, Group Executive Director, Finance & Accounts, NNPC
10	Meeting with the Executive Director Commercial, Pipeline and Product Marketing Company (PPMC)	23 July 2014	<ul style="list-style-type: none"> • Mr. Francis Amego, EDC, PPMC
11	Meeting with Acting Group General Manager of Crude Oil Marketing Division (COMD)	23 July 2014	<ul style="list-style-type: none"> • Mrs Rose Eshiett, Acting Group General Manager of Crude Oil Marketing Division
12	Meeting with the former Group Executive Director, Exploration and Production	24 July 2014	<ul style="list-style-type: none"> • Dr Joseph Dawha, Former Group Executive Director, Exploration and Production
13	Meeting with former Managing Director, NPDC	24 July 2014	<ul style="list-style-type: none"> • Alhaji Hamidu Namtari, Former Managing Director, NPDC
14	Meeting with the Executive Director Operations "EDO", Pipeline and Product Marketing Company (PPMC)	1 August 2014	<ul style="list-style-type: none"> • Emmanuel Wowo, EDO, PPMC • Mr Wono, Manager, Operations

S/N	Meetings held	Date	Attendees and Designation
15	Meeting with representatives of Mobil Producing Nigeria	8 August 2014	<ul style="list-style-type: none"> Mr Anibor Kragha, Upstream Treasurer, ExxonMobil Mr Gbolade Arinoso, Treasurer, ExxonMobil Mrs Iwade, ExxonMobil
16	Meeting with the Executive Director (Commercial) of PPMC on the role of PPMC in the PMS and DPK imports between January 2012 and July 2013)	29 September 2014	<ul style="list-style-type: none"> Mr Francis Amego (Executive Director, Commercial – “EDC”, PPMC) Alhaja Farida (Manager - Sales, PPMC) Mr Dennis (Deputy Manager - Export Sales, PPMC) Alhaji Sidi (Technical Assistant to the EDC, PPMC)
17	Meeting with the Emir of Kano (Former CBN Governor) HRH Sanusi Lamido Sanusi	3 November 2014	<p>Via Email Correspondence. In attendance</p> <ul style="list-style-type: none"> HRH Sanusi Lamido Sanusi, Emir of Kano PwC
18	Close out meetings held with NNPC DGMD/GED F&A, and other NNPC Directors and Heads of Units and Subsidiaries	24 November 2014	<p>NNPC DGMD/GED F&A, and other NNPC Directors and Heads of Units and Subsidiaries</p> <p>PwC</p>
19	Close out meetings held with NNPC DGMD/GED F&A, and other NNPC Directors and Heads of Units and Subsidiaries	27 January 2015	<p>NNPC DGMD/GED F&A, and other NNPC Directors and Heads of Units and Subsidiaries</p> <p>PwC</p>
20	Close out meetings held with NNPC GMD, and DGMD/GED F&A	27 January 2015	<p>NNPC GMD, and DGMD/GED F&A</p> <p>PwC</p>
21	Close out meetings held with NNPC DGMD/GED F&A, and the Senior Technical Adviser to the DGMD/GED	2 February 2015	<p>NNPC DGMD/GED F&A, and the Senior Technical Adviser to the</p>

S/N	Meetings held	Date	Attendees and Designation
	F&A.		DGMD/GED F&A. PwC
22	Close out meetings held with the Honorable Minister of Petroleum Resources	2 February 2015	Honorable Minister of Petroleum Resources PwC
23	We requested for meetings and information from the Central Bank of Nigeria (“CBN”) but were not granted access to nor given the requested information by the CBN		
24	We requested for meetings and information from the Nigeria Petroleum Development Company (“NPDC”) but were not granted access to nor given the requested information by the NPDC		

6.4. Extract of documents reviewed

Document	Source
Report of Preshipment Inspection Agencies covering January 2012 to July 2013	Ministry of Finance
Monthly Official Sales Price (OSP) issued by the NNPC to all Crude Marketers (January 2010 to August 2013)	Crude Oil Marketing Division
Process flows and descriptions for the revenue cycle showing crude oil and product flows as well as funds flow.	Crude Oil Marketing Division
A schedule showing all crude oil liftings, vessels, volumes, marketer and FOB values from all terminals broken down by category (Equity crude sales, SWAP, OPA etc.)	Crude Oil Marketing Division
Listing of all crude marketers utilized by the NNPC during the period January 2012 to July 2013	Crude Oil Marketing Division
Sample copies of crude marketing and sales contracts entered into with off-takers	Crude Oil Marketing Division
All dated Brent prices as published by Platt for the period January 2012 and July 2013	Crude Oil Marketing Division
All periodic Official Selling Prices(OSP)issued by the NNPC covering the period January 2012 to July 2013 for all the different types of crude marketed by the NNPC.	Crude Oil Marketing Division
Prices of all refined products as published by Platt for the period January 2012 to July 2013	Crude Oil Marketing Division
Methodology used to compute Prompt, Advanced and Deferred price of crude oil	Crude Oil Marketing Division
Listing of all Crude Oil Marketers utilized by the NNPC during the period Jan 2012 to July 2013	Crude Oil Marketing Division
FAAC report/accounts (Jan 2012 - July 2013)	Crude Oil Marketing Division
A monthly summary of crude oil quantities pumped to the refineries from the related terminals for the period January 2012 – July 2013	Crude Oil Marketing Division
A listing of all the terminals in Nigeria from which crude is exported or gathered and piped for domestic refining	Department of Petroleum Resources
A monthly summary of crude oil quantities received at the various terminals for the period January 2012 – July 2013	Department of Petroleum Resources
A detailed listing of all the crude oil export cargoes and the party handling the export (owner of the exported crude oil) within the period January 2012 – July 2013	Department of Petroleum Resources
A monthly summary of crude oil quantities piped to the domestic refineries from the related terminals for the period January 2012 – July 2013	Department of Petroleum Resources
A monthly summary of crude oil volumes received at the local refineries for the period January 2012 – July 2013	Department of Petroleum Resources
A listing of all the cargoes of refined petroleum products imported by/on behalf of the PPMC within the period January 2012 – July 2013	Department of Petroleum Resources
A monthly summary of refined product volumes and types pumped out of the local refineries within the period January 2012 – July 2013	Department of Petroleum Resources

NNPC FAAC submissions	Office of the Accountant General of the Federation
Extract of CBN/NNPC Royalty account	Office of the Accountant General of the Federation
NNPC's submissions to FAAC 2012 (January - May) (June - August) (October - December), 2013 (January - August) (October - November)	Revenue Mobilization Allocation and Fiscal Commission
DPR submissions to FAAC 2012 (January, April, July, August), 2013 (January, April, May, June, July, September, November)	Revenue Mobilization Allocation and Fiscal Commission
FIRS submissions to FAAC 2012 (January, July, August, October, December), 2013 (January, February, April, May, June, July, August, September, November)	Revenue Mobilization Allocation and Fiscal Commission
FAAC report/accounts (Jan 2012 - July 2013)	Treasury, NNPC
JP Morgan bank accounts, Domestic Naira and USD DMB accounts, remittance mandates on Equity and Domestic revenue issued to CBN	Treasury, NNPC
Monthly oil movement and quality control reports from NNPC's operation areas	Petroleum Products Marketing Company
Copies of Contract award letters for Capital Expenditure projects during the review period	Petroleum Products Marketing Company
Reconciliation reports between NNPC and Oil Traders, on demurrages incurred during the review period	Petroleum Products Marketing Company
Correspondence/letters between PPMC and PPPRA to identify past issues raised by PPPRA and responses given by PPMC on PMS and DPK importation into Nigeria between January 2012 and July 2013	Petroleum Products Marketing Company
Records and documents for PMS and DPK imports between January 2012 and July 2013	Petroleum Products Marketing Company
Samples of Pro Forma Invoices (PFIs) issued by PPMC to Other Nigerian Marketers of DPK at the point of sale of DPK between January 2012 and July 2013	Petroleum Products Marketing Company
Independent Surveyors reports on quantities of Crude oil piped	Petroleum Products Marketing Company
Report of the Senate Committee on Finance on the investigation of the alleged unremitted \$49.8 billion oil revenue by NNPC	Senate Committee on Finance
Written submissions provided to the Committee by agencies and stakeholders	Senate Committee on Finance
Verbatim Report on Public Hearings	Senate Committee on Finance
PSF Guidelines (amended in 2010)	Petroleum Products Pricing Regulatory Agency
Payments Advice issued by PPPRA to NNPC for PMS and DPK imports between January 2012 and July 2013	Petroleum Products Pricing Regulatory Agency
Lloyds List Intelligence Database Vessel reports	Lloyds List Intelligence

Thompson Reuters Database Vessel reports

Thompson Reuters Eikon

Other reviewed documents are stated within the main body of the report

Final Report - AuGF's Copy