

JTI/EC-2007 Compliance/2013-14/288

18th July, 2013

To,
Dr. A. Mehrotra- Director,
Ministry of Environment & Forest,
Regional Office-Western Region,
Kendriya Paryavaran Bhavan,
Link Road no.: 03,
Ravishankar Nagar,
Bhopal- 462016
Madhya Pradesh

Sub: Six Monthly Compliance Report for the period 1/1/2013 to 30/6/2013

Ref: EC no: J-11011/920/2007-IA II (I), dated: 15/11/2007

Respected Sir,

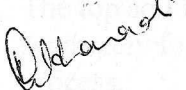
With reference to the Environmental Clearance granted by MoEF, New Delhi vide dated: 15/11/2007, six (6) monthly compliance report is being sent herewith for your kind information. This will be uploaded on JTI website shortly.

This is also to bring to your kind notice that all the **actions by JTI** have been completed in the year 2007-08 and the wells drilled are on regular production.

We have also uploaded the EC granted in 2007 and 2013 on our website: www.jtiindiaprojects.com

Thanking you for your support and guidance.

Yours Faithfully,



Palak Kharadi
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Joshi Technologies International Inc.
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palak.kharadi@gmail.com

Encl: As above

Cc: Shri P.K.Kulkarni, M.D; JTI

COMPLIANCE REPORT FOR ENVIRONMENT CLEARANCE

Condition of EC	Result
A. SPECIFIC CONDITIONS	
<p>1. Compensation for the land acquisition to the land oustees and for standing crop shall be paid as per the prevailing rules.</p>	<p>Action Completed: <i>The land acquired for these wells is agricultural land and there are no land oustees. However, Compensation for the land acquired is being paid regularly since 2007. We have also paid crop compensation and land rent for the year 2013-14 in advance as per prevailing rates of ONGC (PSU).</i></p>
<p>2. The company shall comply with the guidelines for disposal of solid waste; drill cutting and drilling fluids for onshore drilling operation notified vide GSR.546 (E) dated 30th August, 2005</p>	<p>Action Completed: <i>All the guidelines for disposal of solid waste, drill cutting and drilling fluids for onshore drilling operation notified vide GSR.546(E) dated 30th August, 2005 have been followed. The wells drilled and completed in 2007 are on regular production of oil & gas.</i></p>
<p>3. The surface facilities shall be installed as per applicable codes and standards, international practices and applicable local regulations.</p>	<p>Action Completed: <i>The surface facilities already exist (GGS) as per the OISD standards & Oil Mines Rules, 1984. Necessary permissions from Directorate General of Mines & Safety have been obtained wherever required.</i></p>
<p>4. The top soil removed shall be stacked separately for reuse during restoration process.</p>	<p>Action Completed: <i>Hardening of the site was done by bringing earth, sand and rubbles from outside. Top soil removed for construction of waste pit was stacked at the boundary of the pit.</i></p>
<p>5. Drilling waste water including drill cuttings wash water shall be collected in disposal pit lined with HDPE lining evaporated of treated and shall comply with the notified standards for on-shore disposal. The membership of common TSDF shall be obtained for the disposal of drill cuttings and hazardous waste. Otherwise secured land fill shall be created at the site with the Authorization of the SPCB. The design of the secured shall be approved by the SPCB.</p>	<p>Action Completed: <i>Waste water during drilling was collected in disposal pit lined with HDPE lining and with the time there is no water in the pit except rainy water. All the applicable standards were complied for on-shore disposal. We already have the membership of common TSDF situated at Odhav operated by Naroda Enviro Projects Ltd, Ahmedabad for disposal of drill cuttings and hazardous waste.</i></p>

<p>6. The recyclable waste (oily sludge) and spent oil shall be disposed to the authorized recyclers.</p>	<p>Action Completed: <i>Recyclable waste (oily sludge) collected at Effluent treatment plant was disposed off at NEPL Naroda.</i></p>
<p>7. Only water based drilling mud shall be used.</p>	<p>Action Completed: <i>Only water based drilling mud was used for the drilling of wells.</i></p>
<p>8. Quantities of storage and chemicals and additives required for drilling mud preparation shall be below the specified threshold for specified storage permitted under the MSIHC Rules.</p>	<p>Action Completed: <i>Quantities of storage and chemicals and additives used for drilling mud preparation were below the specified threshold for specified storage permitted under the MSIHC Rules.</i></p>
<p>9. Pre hire rig inspection, safety meetings, tool box meeting, job safety analysis and audits shall be carried out to identify hidden /potential hazards.</p>	<p>Action Completed: <i>Pre hire rig inspection, safety meetings, tool box meeting, job safety analysis and audits were carried out to identify hidden / potential hazards.</i></p>
<p>10. The company shall take necessary measures to prevent fire hazards, containing oil spill and soil remediation as needed. At place of ground flaring, the overhead flaring stack with knockout drums shall be installed to minimize gaseous emissions during flaring</p>	<p>Action Completed: <i>The company (JTI) had taken all the necessary measures to prevent fire hazards, containing oil spill and soil remediation during drilling. Installation of stacks with knockout drums was not required as there was no ground flaring near the well sites during / after completion of drilling project. The wells were tested at the GGS.</i></p>
<p>11. The company shall take necessary measures to reduce noise levels at the drill site by providing mitigation measures such as proper acoustic enclosures to the DG set and meet the norms notified by the MoEF. Height of all the stacks/vents shall be provided as per the CPCB guidelines.</p>	<p>Action Completed: <i>The company had taken necessary measures to reduce noise levels at the drill site by providing mitigation measures such as proper acoustic enclosures to the DG set at drill site and meet the norms notified by the MoEF. Report of Noise level recorded during the activity has already been sent to your office along with earlier compliance report. Height of all the stacks provided were as per the CPCB guidelines.</i></p>
<p>12. To prevent fire and explosion at Oil and Gas facility, potential ignition sources shall be kept to a minimum and adequate separation distance between potential sources and flammable material should be in place</p>	<p>Action Completed: <i>To prevent fire and explosion at Oil & Gas facility, potential ignitions sources were kept to a minimum and adequate separation distance by following all the norms related safe inter-distance between oil & gas facilities as given by OISD.</i></p>

	<i>Activities during the operations were continuously monitored by the Safety officer of the Drilling Rig (OGDC Nafta- Poland).</i>
13. The company shall develop a contingency plan for H ₂ S release including all necessary aspects from evacuation to resumption of normal operations. The workers shall be provided with personal H ₂ S detectors in locations of high risk of exposure along with self containing breathing apparatus	Action Completed: <i>Since discovery of Dholka field in 1960s H₂S has not been observed in any well. The contingency plan for other factors like fire, explosion, spillage, blow out, etc. was strictly followed.</i>
14. To prevent well blow outs during drilling operations, Blow Out Preventor (BOP) system shall be installed. Blow Out Prevention measures during drilling shall focus on maintaining well bore hydrostatic pressure by proper pre-well planning, drilling fluid and logging etc.	Action Completed: <i>To prevent blow out during drilling operations, a suitable Blow Out Preventer (BOP) system was used. Geo Technical Order (GTO) for drilling of each well was kept ready before drilling operation. Proper specific gravity of drilling fluid was maintained during drilling. It was monitored by the Mud Engineering Services and JTI company man.</i>
15. The company shall take measures after completion of drilling process by well Plugging and secured enclosures, decommissioning of rig upon abandonment of the well and drilling site shall be restored to near original condition. In the event that no economic quantity of hydrocarbon is found a full abandonment plan shall be implemented for the drilling site in accordance with the applicable Indian Petroleum Regulations.	Action Completed: <i>After completion of drilling, all the 6 wells have been proved to be oil producers. There was no dry well as such plugging of the well and abandonment plan as per applicable Indian Petroleum Regulations was not required to be implemented.</i>
16. Occupational health surveillance of the workers shall be carried out as per the prevailing Acts and Rules.	Action Completed: <i>Occupational health surveillance of the workers was carried out as per the Mines Act, 1984.</i>
B. GENERAL CONDITIONS	
1. No further expansion or modification in the project shall be carried out without prior approval of the Ministry of Environment & Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any	<i>Project was completed as per EC granted during the year 2007-08. No further expansion and modification was carried out.</i>

<p>2. The emissions of (RSPM, SPM, SO₂, NO_x, HC & VOC) from DG Set and from flare stack shall conform to the standards prescribed by the SPCB. Regular monitoring of Ambient Air for HC and VOC shall be carried out as per CPCB guidelines. Stack height attached to DG sets shall be in-conformance with the environment protection acts and rules.</p>	<p>Action Completed: <i>The emissions of (RSPM, SPM, SO₂, NO_x, HC & VOC) from DG Set were monitored during drilling activities by our consultant M/s. Kadam Environmental Consultants Vadodara, Gujarat Pollution Control Board approved company. As there was no flaring, monitoring of flare stack was not required. Stack height attached to DG sets were in-conformance with the environment protection acts and rules. All emission parameters were within the prescribed limit by SPCB.</i></p>
<p>3. The project authorities must strictly comply with the rules and regulations under Manufacture, Storage and import of Hazardous chemicals Rules, 1989 as amended subsequently. Prior approvals from Chief Inspectorate of Factories, Chief Controller of Explosives, Fire Safety Inspector etc. must be obtained, wherever applicable.</p>	<p>Action Completed: <i>The project authorities had strictly complied with rules and regulations under Manufacture, Storage and import of Hazardous chemicals Rules, 1989. JTI also has license to store and use Explosives from Chief Controller of Explosives, Nagpur.</i></p>
<p>4. The project authorities must strictly comply with the rules and regulation with regard to handling and disposal of Hazardous Wastes (Management and Handling) Rules, 1989/2003 wherever applicable. Authorization from the State Pollution Control Board must be obtained for collections/treatment/storage/disposal of hazardous wastes.</p>	<p>Action Completed: <i>JTI had authorizations (NOC) for collection/ treatment/ storage/disposal of hazardous wastes were obtained from Gujarat Pollution Control Board before commencement of project. Company followed the rules and regulation with regard to handling and disposal of Hazardous Wastes (Management and Handling) Rules, 1989/2003 as applicable.</i></p>
<p>5. The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under EPA Rules, 1989 viz. 1989 75 dBA (daytime) and 70 dBA (nighttime)</p>	<p>Action Completed: <i>The overall noise levels in and around the plant area were kept well within the standards with the usage of acoustic enclosures. The ambient noise levels confirmed to the standards prescribed under EPA Rules, 1989 viz. 1989 75 dBA (daytime) and 70 dBA (nighttime).</i></p>
<p>6. A separate Environmental Management Cell equipped with full fledged laboratory facilities must be set up carry out the environmental management and monitoring functions.</p>	<p>Action Completed: <i>To carry out Environment Management and monitoring functions, JTI availed the services of M/s. Kadam Environmental Consultants – Vadodara .</i></p>

<p>7. The project authorities will provide adequate funds both recurring and non-recurring to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purposes.</p>	<p>Action Completed: Funds were kept and utilized for environment purpose only.</p>
<p>8. The Regional Office of this Ministry at Bhopal/Central Pollution Control Board/State Pollution Control Board will monitor the stipulated conditions. A six monthly compliance report and the monitored data along with statistical interpretation shall be submitted to them regularly.</p>	<p>Action Completed: Six monthly compliance report is being sent to RO MOEF Bhopal and Monthly monitoring report is being sent to State pollution control Board (GPCB) Nadiad, Dist: Kheda, Gujarat.</p>
<p>9. The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the State Pollution Control Board/Committee and may also be seen at Website of the Ministry and Forests at http://www.envfor.nic.in. This shall be advertised within seven days of the issue of this letter in at least two local newspapers that are widely circulated in the region of which on shall be in the vernacular language of the locality concerned.</p>	<p>Action Completed: The Project proponent advertised accorded Environmental Clearance within 7days of issue of the EC letter in two local newspapers namely Divya Bhaskar & Economic Times dated 23/11/2007.</p>
<p>10. The Project Authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of commencing the land development work.</p>	<p>Action Completed: The details are as under.</p> <ul style="list-style-type: none"> • Date of NOC from Gujarat Pollution Control Board: 29th October 2007 • Date of EC from MoEF New Delhi: 15th November 2007 • Date of commencement of land development work: 20th November 2007 • Date of commencement of drilling activities: 31st October 2007 • Completion date of drilling project of 6 wells: 12th April 2008 • Date of financial closures of the project: 30th April 2008