



**MERCATOR PETROLEUM**  
L I M I T E D  
(a subsidiary of Mercator Limited)

Date: 2<sup>nd</sup> July 2020

Letter No: MPL/CB-09/FICO/672

To,

Additional Principal Chief Conservator of Forest (Central)  
Ministry of Environment, Forest and Climate Change  
E-5, Kendriya Paryavaran Bhavan,  
Regional Office, Western Region,  
E-5, Arera Colony, Link Road No-3,  
Ravishankar Nagar,  
Bhopal-462016 (Madhya Pradesh)  
Tel: 0755-2426611, 2466525

**Sub: Submission of Half Yearly Progressive Compliance Report of Environment Clearance for Onshore Development and Production of Oil & Gas from the wells of M/s. Mercator Petroleum Ltd, in Bharuch district of Gujarat, India in Block CB-ONN-2005/9 ("Block") (Period January-2020 to June-2020).**

**Ref: Ministry Letter F. No: J-11011/576/2017-IA-II-(I) Dated: 7<sup>th</sup> January 2020.**

Dear Sir,

This has reference to your letter F. No. J-11011/576/2017-IA-II-(I) dated 7<sup>th</sup> January 2020 (enclosed), vide which Environmental clearance had been accorded under EIA notification.

We would like to bring to your kind notice that there has been no drilling, workover & production operations in the field at CB-ONN-2005/9 onshore block during the period from 7<sup>th</sup> January 2020 to 30<sup>th</sup> June, 2020.

Please find enclosed herewith the Half Yearly Progressive Compliance Reports.

The above submission is for your kind information and records.

Thanking you.

Yours Sincerely,  
For Mercator Petroleum Limited



**Adip Mittal**  
**Managing Director (MC Member)**

**Encl:**

- 1- Half Yearly EC Compliance Report (Period: January-2020 to June-2020).
- 2- Ministry Letter F. No: J-11011/576/2017-IA-II-(I) Dated: 7<sup>th</sup> January 2020.



## **Half Yearly Compliance Report**

**Environmental Clearance (J-11011/576/2017-IA-II-(I))  
for Onshore development & Production of Oil & Gas from  
the Block CB-ONN-2005/9**

**Jan-2020 to Jun-2020**



# 1 COMPLIANCE TO CONDITIONS OF ENVIRONMENTAL CLEARANCE

The Ministry of Environment and Forests had issued vide its letter F. No. J-11011/576/2017- IA II (I) dated 7<sup>th</sup> January 2020.

**Table 1-1: Compliance to Condition Mention in EC**

S No	Condition	Compliance						
<b>Specific Condition</b>								
3	<p>The Product Capacity will be as under</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Product</th> <th>Proposed Production</th> </tr> </thead> <tbody> <tr> <td>Crude Oil</td> <td>6500 BOPD</td> </tr> <tr> <td>Natural Gas</td> <td>1 MMSCFD</td> </tr> </tbody> </table>	Product	Proposed Production	Crude Oil	6500 BOPD	Natural Gas	1 MMSCFD	<p>Yes... Noted the Product capacity will be as specified.</p> <p>Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).</p>
Product	Proposed Production							
Crude Oil	6500 BOPD							
Natural Gas	1 MMSCFD							
4	<p>The Land requirement will be 110M X 110 M for each well.</p> <p>Green Belt will be developed in an area of 33% area out of the total project area.</p> <p>The Estimated project cost is Rs.200 Crore. The one time expenditure for environmental management and mitigation is estimated to be approx. Rs. 1,12, 20,000 per well and the recurring cost (O&amp;M) will be about Rs. 20,50,000/annum.</p>	<p>Noted....</p> <p>Noted...We Will Develop the Green Belt of 33% of the Total Project area.</p> <p>Noted...</p>						
6	<p>Total water requirement is 40cum/day/well proposed to be met from ground water.</p> <p>Effluent of 5 cum/day will be send to CETP/solar evaporation pit. Domestic effluent will be sent to septic tank followed by soak pit. During production waste water generation will be 1050 cum/day which will be treated in adequate sized ETP and treated water will be re-injected in well at 1000 m below the ground level.</p>	<p>Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).</p> <p>Noted.. Total Water requirement will not exceed 40cum/day/well and will be sourced from ground water.</p> <p>Noted....</p> <p>1-Soak Pit will be developed for Domestic Effluent, 2- Solar Evaporation pit will be developed for the disposal of effluent during drilling, 3- Adequate size of ETP will be made for the treatment of waste during production and will be re-injected in the well at 1000 m below the ground level.</p>						
a	<p>Necessary permission as mandated under the Water (Prevention &amp; Control of Pollution) Act, 1974 and the Air (Prevention &amp; Control of Pollution) Act, 1981as applicable time to time, shall be obtained from State Pollution Control Board</p>	<p>Consent To Operate (CTO) will be taken before any start of the Production operations from State Pollution Control Board (Gujarat).</p> <p>Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).</p>						

<b>S No</b>	<b>Condition</b>	<b>Compliance</b>
b	As proposed by the Project Proponent, Zero Liquid Discharge shall be ensured and no waste/treated water discharge to surface water body sea and or land.	There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9). Zero Liquid Discharge shall be ensured and will not discharge to surface water body sea and or land.
c	To Control Source of the Fugitive emission suitable pollution control device shall be installed to meet the prescribed norms and/or the NAAQS. The gaseous emission shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.	There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9). Suitable pollution control device will be installed to meet the prescribed norms and/or the NAAQS, and stack of adequate height will be maintained as per CPCB/SPCB guidelines.
d	Necessary authorization required under the Hazardous and other waste (Management & Transboundary Movement) Rules, 2016, Solid Waste Management Rules 2016 shall be obtained and the provision contained in the Rules shall be strictly adhered to.	Necessary membership will be taken of approved disposal agency of SPCB for the disposal of hazardous waste will be taken.  Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).
e	Ambient air quality shall be monitored at the nearest human settlements as per the National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R No. 826 ( E ) dated 16 <sup>th</sup> November, 2009 for PM10, PM2.5, SO2, NOX, CO, CH4, HC, Non-Methane HC etc.	Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9). Ambient air quality shall be monitored at the nearest human settlements when the production operations starts.
f	During Exploration, production, storage and handling, the fugitive emission of Methane, if any, shall be monitored using Infra-Red camera/appropriate technology.	Noted... Fugitive Emission of Methane will be monitored if any. Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).
g	The Project Proponent also to ensure trapping/stroing of the CO2 generated, if any, during the process and handling.	Not Applicable for this project.
h	Approach road shall be made pucca to minimize generation of suspended dust.	Noted... Approach road shall be made pucca to minimize generation of suspended dust.
i	The company shall make the arrangement for control of noise from the drilling activity. Acoustic enclosure shall be provided to DG sets and proper stack height shall be provided as per CPCB guidelines	Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9). Acoustic enclosure enabled DG sets and proper stack height shall be provided.
j	Total water requirement shall not exceed the proposed quantum 40 CUB/Day/Well proposed to be met from ground water.	Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9). Noted.... Total water requirement will not exceed 40CUB/Day/Well.
k	The company shall construct the garland drain all around the drilling site to prevent runoff of any oil containing waste into the nearby water bodies.	Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9) Noted... company will construct the garland drain all around the drilling site to prevent runoff of any oil containing waste into the

<b>S No</b>	<b>Condition</b>	<b>Compliance</b>
	<p>Separate drainage system shall be created for oil contaminated and non-oil contaminated.</p> <p>Effluent shall be properly treated and treated wastewater shall conform to CPCB standards.</p>	<p>nearby water bodies and Separate drainage system shall be created for oil contaminated and non-oil contaminated.</p> <p>Effluent generated from production &amp; domestic utilities will be treated as per CPCB standards.</p>
l	<p>Drill cuttings separated from drilling fluid shall be adequately washed and disposed in HDPE lined pit. Waste mud shall be tested for hazardous contaminants and disposed according to HWMH Rules, 2016. No effluent drilling mud/drill cutting shall be discharged/disposed off into nearby surface water bodies. 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>Noted... There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9)</p>
m	<p>Oil spillage prevention scheme should be prepared.</p> <p>In case of oil spillage/contamination a action plan shall be prepared to clean the site by adopting proven technology.</p> <p>The recyclable waste (oily sludge) and spent oil should be disposed of to the authorized recyclers.</p>	<p>Noted... There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9)</p>
n	<p>The Company shall take necessary measures to prevent fire hazards, containing oil spill and soil remediation as needed.</p> <p>Possibility of using ground flare shall be explored. At the place of ground flaring, the overhead flaring stack with knockout drums shall be installed to minimize gaseous emissions during operation.</p>	<p>Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9)</p>
o	<p>The company shall develop a contingency plan for H<sub>2</sub>S release including all necessary aspects from evacuation to resumption of normal operations.</p> <p>The workers shall be provided with personal H<sub>2</sub>S detectors in locations of high risk of exposure along with self-containing breathing apparatus.</p>	<p>Block CB-ONN-2005/9 field is a sweet gas field there is no any H<sub>2</sub>S content available with the oil &amp; gas production.</p> <p>Noted... There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9)</p>
p	<p>The Company shall carry out long term subsidence study by collecting base line data before initiating drilling operation till the project lasts. The data so collected shall be submitted six monthly to the Ministry and its Regional Office at Bhopal.</p>	<p>Currently There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9)</p> <p>The Company will carry out long term subsidence study by collecting base line data before the commercial production start-up at site and data so collected will be submitted six monthly to the Ministry and its Regional Office at Bhopal along with compliance report.</p>

<b>S No</b>	<b>Condition</b>	<b>Compliance</b>
q	<p>Blow Out Preventer (BOP) system shall be installed to prevent well blowouts during drilling operations.</p> <p>BOP measures during drilling shall focus on maintaining well bore hydrostatic pressure by proper pre-well planning and drilling fluid logging etc.</p>	<p>Noted... There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9)</p>
r	<p>Emergency Response Plan (ERP) shall be based on the guidelines prepared by OISD, DGMS and Govt. of India.</p>	<p>Noted... There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).</p>
s	<p>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 the area in original condition.</p> <p>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.</p>	<p>Noted... There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9)</p> <p>On completion of the testing ,In the event of Non-Economic quantity of Hydrocarbon is found well will be abandoned as per OISD &amp; DGMS guidelines and land will be restored as per legal requirement mentioned in EIA &amp; EMP.</p>
t	<p>All the commitment made regarding issues raised during the public hearing/ consultation shall be satisfactorily implemented</p>	<p>Yes. All the commitment made regarding issues raised during the public hearing/ consultation shall be satisfactorily implemented.</p>
u	<p>At least 0.75% of the total project cost shall be allocated for Corporate Environment Responsibility (CER) and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office.</p>	<p>Yes. During Development Phase also company has mentioned in EIA a five-year plan for the Socio-economic growth of the local villagers under Corporate Environment Responsibility (CER).</p>
v	<p>Occupational health surveillance of the workers shall be carried out as per the prevailing Acts and Rules.</p>	<p>Yes. Occupational Health Surveillance of workers were carried out as per the DGMS requirement i.e. as per FORM-0.</p>

<b>S No</b>	<b>Condition</b>	<b>Compliance</b>
w	Restoration of the project site shall be carried out satisfactorily and report shall be sent to the Ministry's Regional Office at Bhopal.	Yes. If found Non-Economic the Restoration of the project site after completion of drilling will be carried out and the report of well abandonment & site restoration report will be submitted to Ministry's Regional Office at Bhopal.
x	Oil content in the drill cuttings shall be monitored by some Authorized agency and report shall be sent to the Ministry's Regional Office at Bhopal	Noted... There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).
y	An audit shall be done to ensure that the Environment Management Plan is implemented in totality and report shall be submitted to Ministry's Regional Office	There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).
z	Company shall have own Environment Management Cell having qualified persons with proper background	Currently...There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9)
aa	<p>Company shall prepare operating manual in respect of all activities, which would cover all safety &amp; environment related issues and measures to be taken for protection.</p> <p>One set of environmental manual shall be made available at the drilling site/ project site. Awareness shall be created at each level of the management. All the schedules and results of environmental monitoring shall be available at the project site office. Remote monitoring of site should be done.</p>	<p>Noted... Company will prepare Safe Operating Manual (Procedure), Risk &amp; Environment Aspect Registers for all the activities which would cover all safety &amp; environment related issues and measures for protection.</p> <p>There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).</p>
bb	On completion of drilling, the wells shall be suitably plugged and obtain certificate from environment safety angle from the concerned authority.	Noted... There is no any workover/drilling/production operations has been started in our Block (CB-ONN-2005/9).

S No	Condition	Compliance
10.1 The grant of Environmental Clearance is further subject to compliance of other generic conditions as under:-		
i	The project authorities must strictly adhere to the stipulations made by the state Pollution Control Board (SPCB), State Government and/ or any other statutory authority.	Noted... We shall strictly adhere to the stipulations made by the state Pollution Control Board (SPCB), State Government and/ or any other statutory authority.
ii	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change. 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.	Noted... There will be no further expansion or modifications in the plant without prior approval of the Ministry of Environment, Forest and Climate Change.
iii	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one stations each is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	Noted...
iv	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 15th November, 2009 shall be complied with	Noted will follow The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 15th November, 2009 shall be complied with.
v	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 Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	Noted... The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
vi	The Company shall harvest rainwater from the roof tops of the buildings to recharge ground water, and to utilize the same for different industrial operations within the plant.	Noted... Rain Water Harvesting system will be implemented in the facility.
vii	Training shall be imparted to all employees on safety and health aspects of chemicals handling.  Pre-employment and routine periodical medical	Noted... Training shall be imparted to all employees as per legal requirements.



<b>S No</b>	<b>Condition</b>	<b>Compliance</b>
	examinations for all employees shall be undertaken on regular basis.	Noted... Pre-employment and Routine periodical medical examinations will be conducted as per DGMS requirements i.e. FORM-O.
viii	The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing shall be implemented.	Noted... Company will develop the Environment Aspect & Risk Aspect Register covering all the recommendations made in EIA/EMP in respect of environmental management, risk mitigation measures, Public Hearing and as per legal requirements.
ix	The company shall undertake all measures for improving socio-economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villagers, administration and other stake holders. Also eco-developmental measures shall be undertaken for overall improvement of the environment.	Noted... CSR shall be undertaken as per mentioned in EIA after commercial productions commences.
x	A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	Noted... we will appoint NABL accredited consultant for carrying out environmental monitoring.
xi	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.	Noted... The Company shall keep sufficient funds for environment management/pollution control measures in the budget every year and shall not be diverted for any purpose.
xii	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zila Parishad/ Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.	Noted... copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zila Parishad/ Municipal Corporation, Urban local Body and the local NGO.
xiii	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF&CC, the respective Zonal office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company	Noted Half yearly reports will be submitted to legal bodies on timely basis.

S No	Condition	Compliance
xiv	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional offices of MoEF&CC by e-mail	Noted... Environment Statement of each financial year will be submitted on timely basis.
xv	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 SPCB/Committee and may also be seen at Website of the Ministry at <a href="http://moef.nic.in">http://moef.nic.in</a> . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional office of the Ministry.	<p>We have publish the grant of Environmental clearance to M/s. Mercator Petroleum Ltd for CB-ONN-2005/9 Block, in the 02nos of local news papers one of which is in vernacular language (English-Indian Express, Gujarati-Gujarat Samachar) widely circulated in the region on dated 13<sup>th</sup> January 2020.</p>  