



**Regional workshop on Recent advances in Environment & Forest Laws
with special reference to Oil, Petroleum & Gas Sector (2nd Edition)**

**Changes required in Environmental Regulations for EODB in Oil &
Gas Exploration and Production Activities in NER to fulfil Vision of
the Nation to become “Energy Independence by 2047”**

J.Lahiri

**General Secretary, Society for Petroleum Professionals
(Ex Executive Director, OIL and
Ex HOD-North East and Member Secretary, NECC, DGH)**

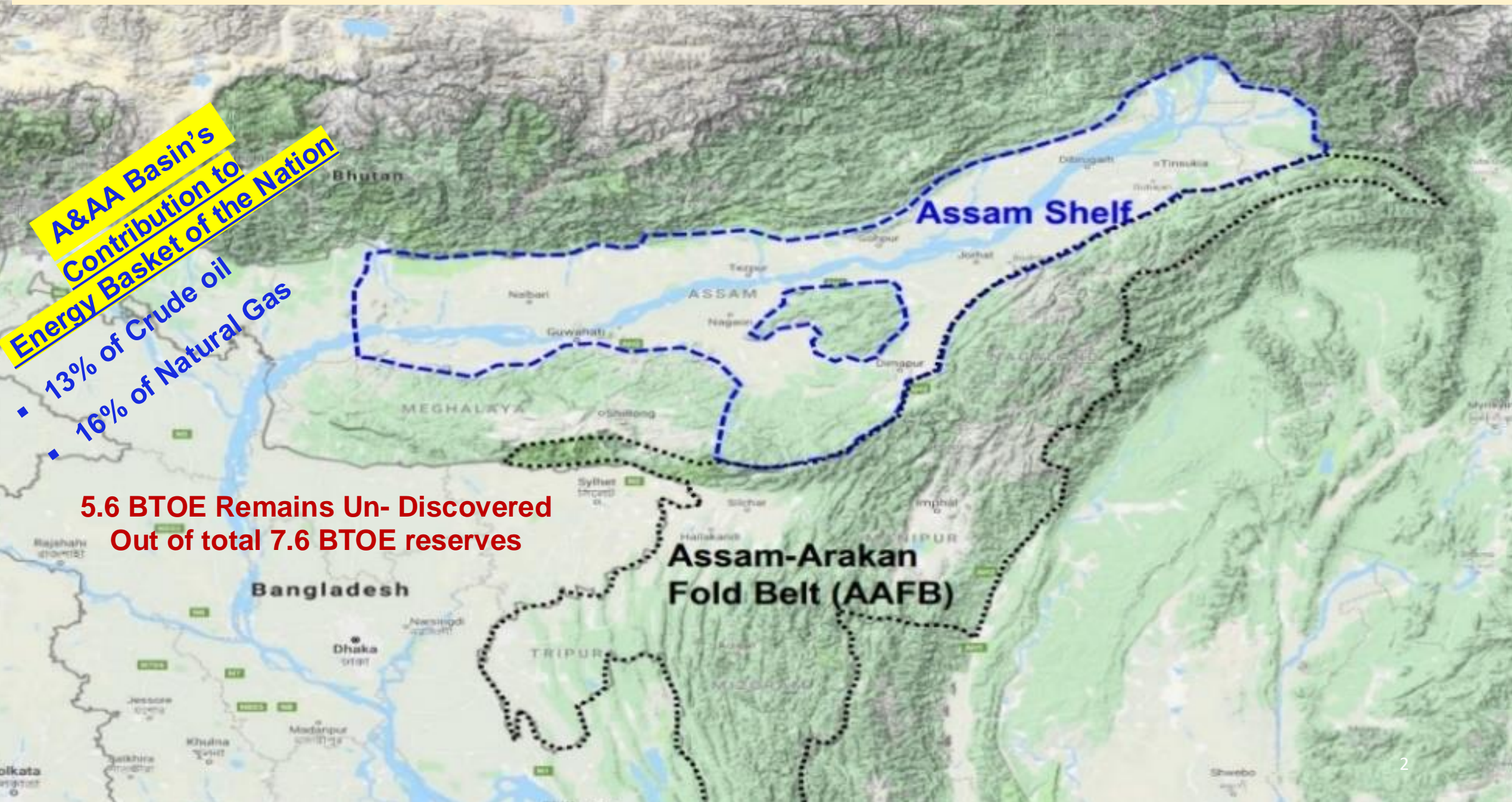
DATE: 23RD JANUARY, 2025

Assam Shelf and Assam- Arakan Fold Belt- Two Cat-I Sedimentary Basins of NER (1,36,825 sq. kms)

A&AA Basin's Contribution to Energy Basket of the Nation

- 13% of Crude oil
- 16% of Natural Gas

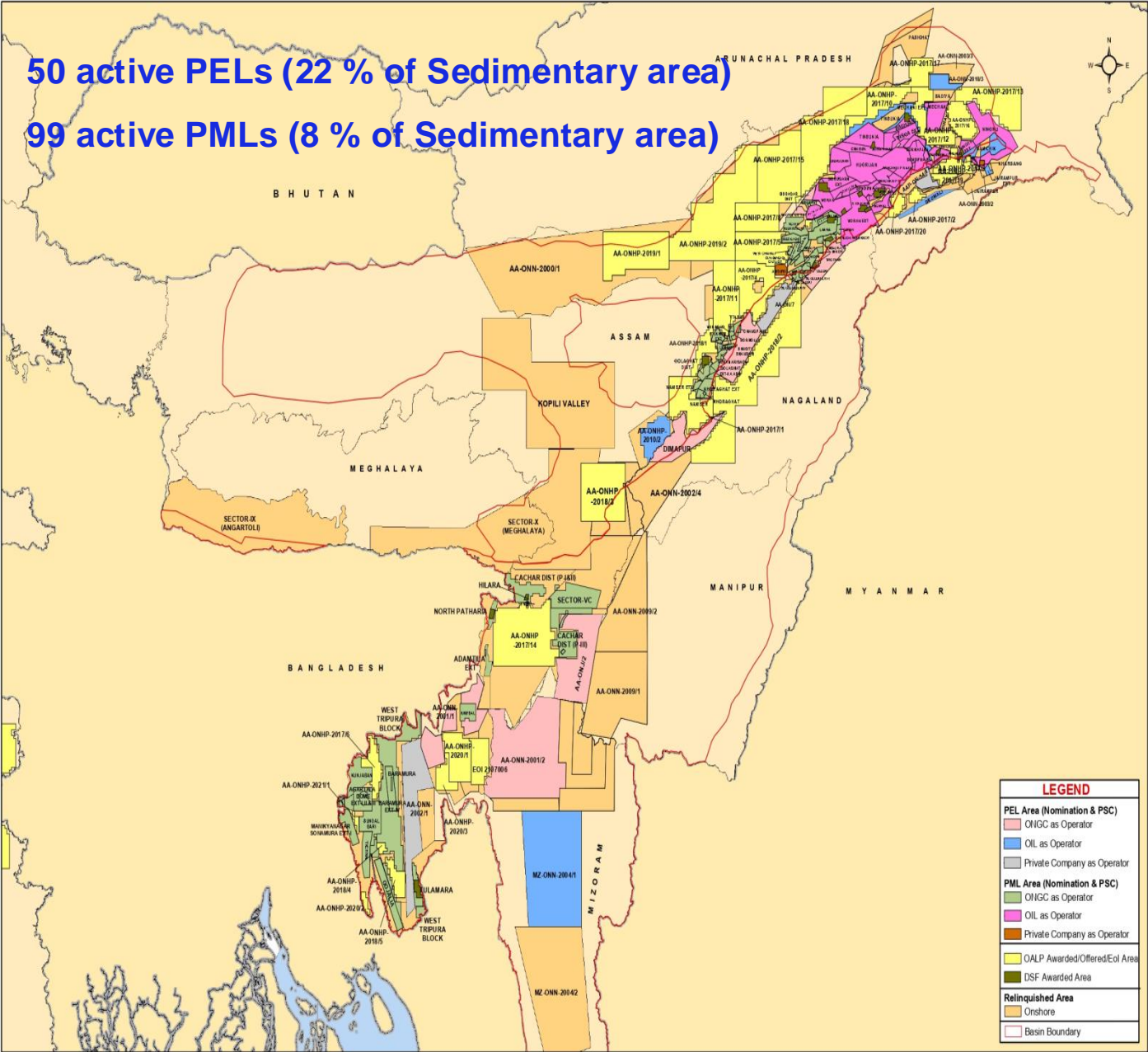
**5.6 BTOE Remains Un- Discovered
Out of total 7.6 BTOE reserves**



Allotted Oil Blocks in North Eastern Region (2022)

50 active PELs (22 % of Sedimentary area)

99 active PMLs (8 % of Sedimentary area)



State	Blocks / Fields Assigned
Arunachal Pradesh	18
Assam	102
Mizoram	3
Nagaland	11 + DAB Issue
Tripura	23
TOTAL	157

E&P Operators Actively Involved in North East for O&G Exploration



Oil and Natural Gas Corporation

- PEL – 6,539.4 sq.km
- PML – 6,009.1 sq.km
- Oil Production – 0.96 MMT
- Gas Production – 2.02 BCM
- No. of Blocks and Fields- 43



Oil India Limited

- PEL – 3,617.1 sq. km
- PML – 4,340.2 sq.km
- Oil Production – 2.93. MMT
- Gas Production – 2.29 BCM
- No. of Blocks and Fields- 39



GeoEnpro Petroleum Limited

- PEL – 0
- PML – 10.0 sq.km
- Oil Production – 0.03 MMT
- Gas Production – 0.005 BCM
- No. of Blocks and Fields- 01



Hindustan Oil Exploration Company

- PEL – 79.2 sq.km
- PML – 75.9 sq.km
- Oil Production – 0.03 MMT
- Gas Production – 0.36 BCM
- No. of Blocks and Fields- 02



Vedanta Limited

- PEL – 7,277.8 sq. km
- PML – 30.7 sq.km
- No. of Blocks and Fields- 13



Invenire Energy Private Limited

- PEL – 0
- PML – 21.3 sq. km
- No. of Blocks and Fields- 01



Megha Engineering and Infrastructure Ltd

- PEL – 0
- PML – 8.9 sq. km
- No. of Blocks and Fields- 01



Indian Oil Corp Ltd

- PEL – 0
- PML – 52.0 sq. km
- No. of Blocks and Fields- 02



Oilmax Energy Pvt Ltd

- PEL – 0
- PML – 20.4 sq. km
- No. of Blocks and Fields- 02



Jubilant Oil and Gas Pvt Ltd

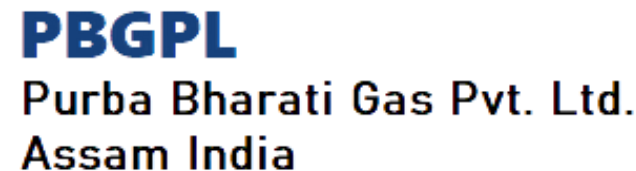
- PEL – 1260.0
- PML – 0.0
- No. of Blocks and Fields- 01



Antelopus Energy Pvt Ltd

Purchased Duarmara Block from Oilmax

Oil Sector Other Companies Executing Projects in North East



O&G Projects of worth Rs 1 Lakh Crore

Approved by Gol for Execution in NER by 2025

Shri Harjeet Singh Puri, Hon'ble Minister P&NG

Announced during the NE Investor meet at Guwahati on 21.09.2021

Challenges for O&G E&P Activities in NER

Landed Onshore E&P Cost in NER is almost at par with deep Offshore projects

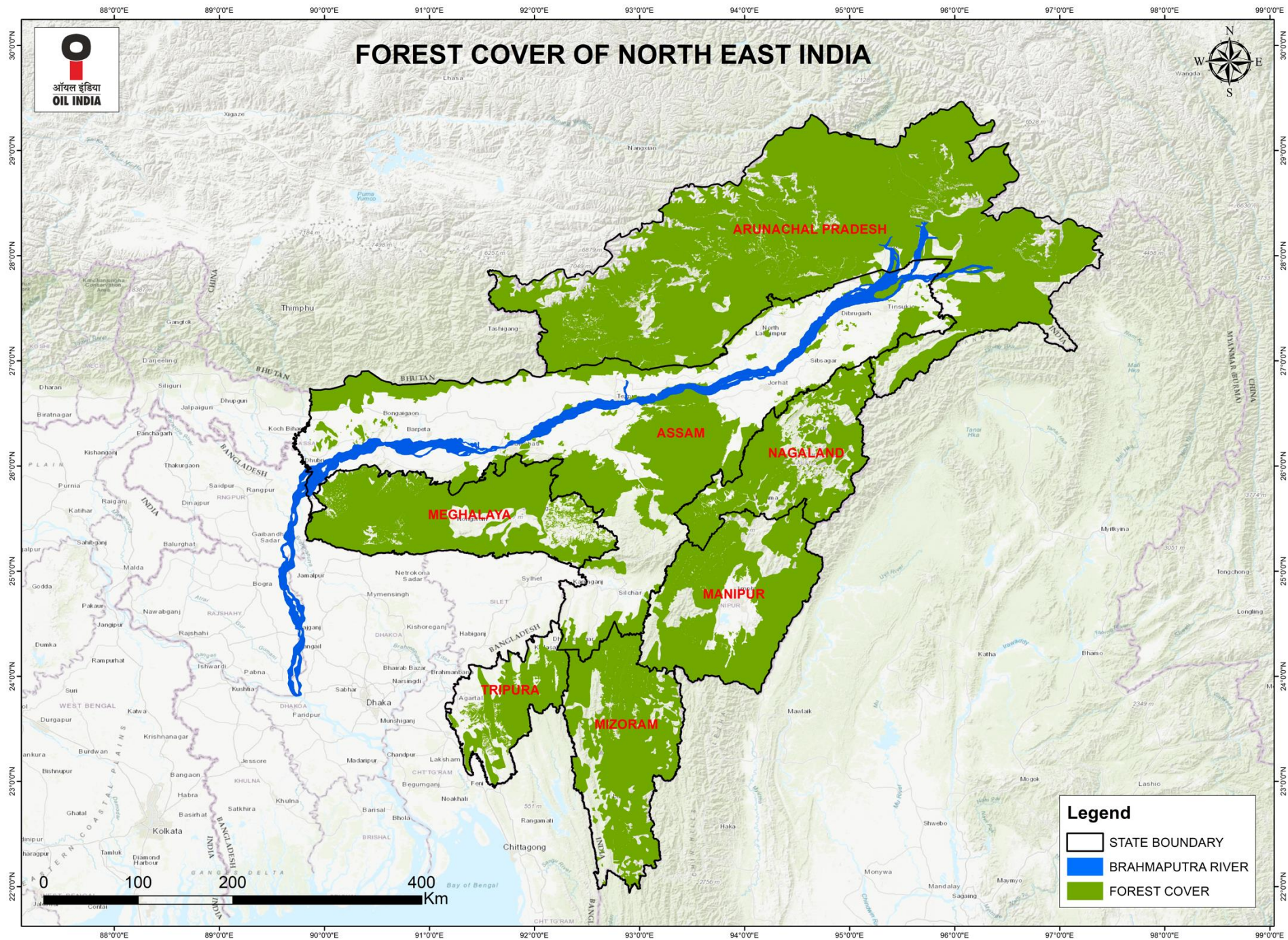


Challenges in Environmental Fronts for O&G E&P Activities in NER

- **Forest Clearances and Wildlife Clearances** (64.2% forest cover in NER when it is 19.4 % in ROI)
- **10 Km ESZ for 8 PAs continuing in Assam and Arunachal Pradesh since 04.12.2006** - Draft ESZ notification pending for **5 PAs in Assam** and Draft/Final notification pending for **3 PAs in AP**
- **It takes minimum 4-5 years time in getting Stage-I FC or WLC in NER**
- **Many Oil Blocks in NER is spread over Two States- Doubling the required approval processes**

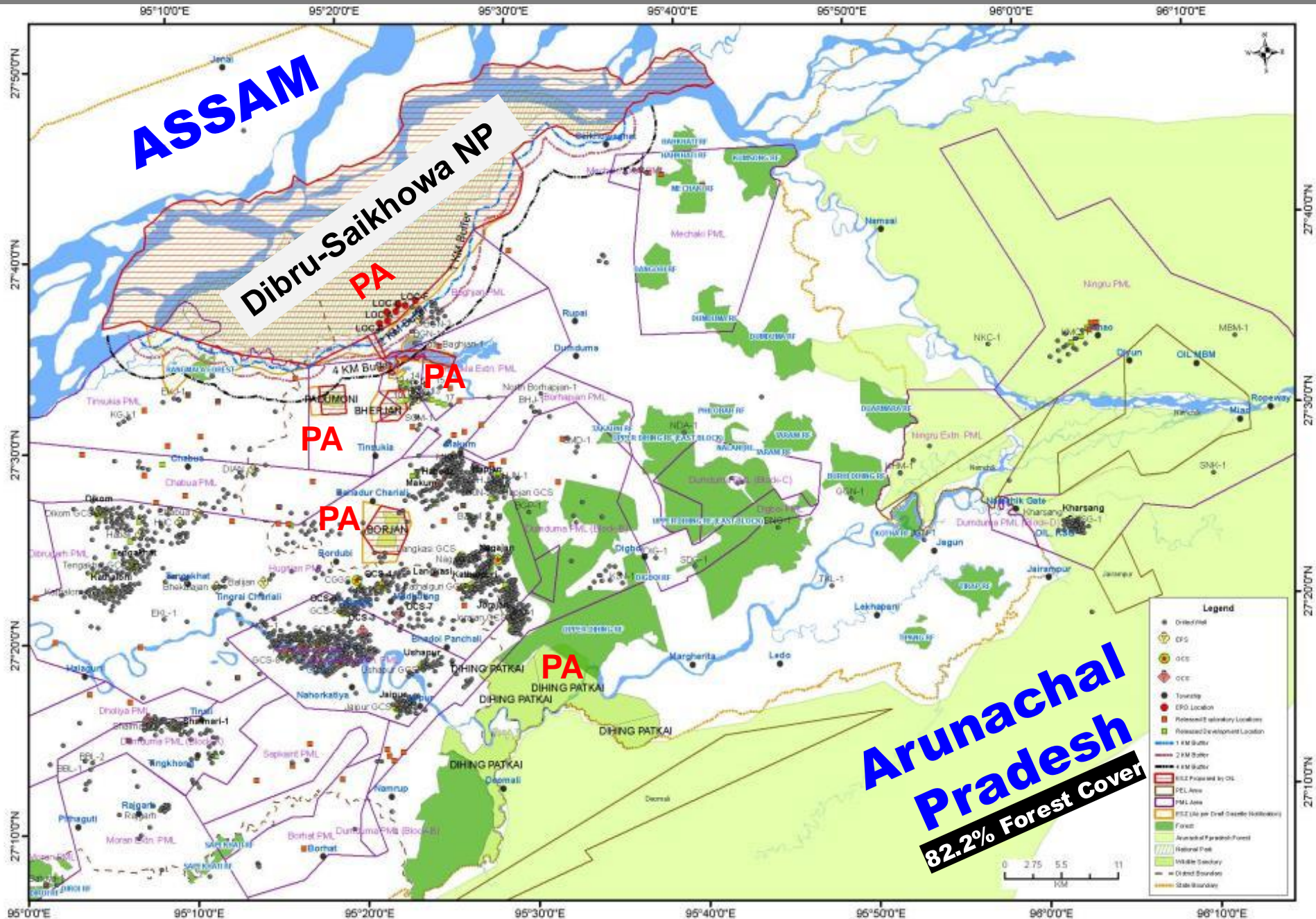
Other Challenges in NER:

- **Limited Fair-Weather Window – Dry season of 4 months only in a year (November to December)**
- **Hilly & Riverine terrains**
- **Road Breaches and Landslides** due to Flood
- **Closed Proximity to International Border** with Bangladesh, Myanmar, China , Bhutan and Nepal
- **Unstable Socio-Political Situation**
- **Dominance of Tribal Autonomy Council** in Tripura & Assam
- **Disputed Area Belt (DAB)** with Nagaland
- **Narrow Mountain Roads, Steep Inclines, Hairpin Bends, Narrow Township Roads with overhead cables**



State	Forest Cover % Out of Total Geographical Area
Mizoram	87.0 %
Nagaland	85.4 %
Arunachal Pradesh	82.2 %
Manipur	77.9 %
Meghalaya	69.7 %
Tripura	54.8 %
Assam	30.2 %
Total	64.2 %
India	19.4 %

Forest cover in Assam & Arunachal Pradesh- Affected Blocks of OIL



Mizoram Block of OIL



Tripura in 2024- Road Breaches & Landslides during Monsoon



Challenges in obtaining Forest Clearance in NER :

Grant of Stage-I FC (IPA) Takes minimum 4-5 years Time in NER

- RoFR Certificates in compliance to FRA, 2006 (**Resolutions of Gram Sabha and FRC**)
- Land for CA purpose
- Wildlife Management Plan - in consultation with WII, Dehradun & approval from CWLW
- Digitised Geo Reference Maps not available for NER
- **Encroachments in Forestlands due to change in demographic patterns in last 3/4 decades**
- Access to DSS of FSI, Dehradun by Forest Officials-**N/A in most cases**
- Repeated EDS Queries against the same FC Proposal

Arunachal Pradesh - FC Approval Patterns

2013 FC Proposal	2014 FC Proposal	2015 FC Proposal	2016 FC Proposal	2018 FC Proposals	2019 FC Proposal	2020 FC Proposal	2023 FC Proposals
<p>8 yrs</p> <p>6 months</p> <p>(Loc NMA)</p> <p><u>Time taken to accord Final FC</u></p> <p>Applied on: 05.09.2013</p> <p>Final FC : 30.03.2022</p>	<p>9 yrs</p> <p>6 months</p> <p>(45 wells in Kharsang PML)</p> <p><u>Time taken to accord Final FC</u></p> <p>Applied on: 27.05.2014</p> <p>Final FC : 15.03.2024</p>	<p>8 yrs 10 months to grant FC <u>under 2(1)(iii) for Grant of Ningru Extn PML by State Govt</u></p> <p>Applied on: 29.07.2015</p> <p>Initial FC under 2(iii): 16.02.2020</p> <p>Final FC under 2(1)(iii) : 27.05.2024</p>	<p>Relinquished the Deomali PEL block in 2024 –</p> <p><u>As Final FC not obtained after grant of IPA in 4 yrs</u></p> <p>Applied on: 18.07.2016</p> <p>IPA: 31.08.2020</p>	<p>Relinquished Block in 2024-AA/ONDSF/ Kherem/2016</p> <p>Initial FC under 2(iii) was granted on 07.08.2019 for granting PML - But Final FC under 2(1)(iii) not granted till 2024</p> <p>6 yrs time taken to Regularise FCA Violation for Ningru PML (01.11.2018 to 30.10.2024)</p> <p>3 yrs to get Final FC for Loc- KUP & KUL</p> <p>*Possession not obtained (FC on 25.02.2021)</p>	<p>Awaited 6 yrs for Regularisation of FCA Violation for Kharsang PML Block since after settlement of Rs 12.57 cr as Panel CA, Panel NPV in 2018</p> <p>Applied on: 24.04.2019</p>	<p>IPA in 3.1 yrs for Diversion of 29.32 Ha Forest lands in Ningru PML- Final FC awaited</p> <p>Applied on: 21.12.2020</p> <p>IPA: 20.01.2024</p>	<p>IPA awaited 2 Proposals</p> <p>Location KHAR – Applied :07.06.2023</p> <p>Location OCKA – Applied: 21.11.2023</p>

Assam - FC Approval Patterns

2016 FC Proposals	2017 FC Proposals	2018 FC Proposals	2020 FC Proposals	2021 FC Proposals	2022 FC Proposal	2023 FC Proposals	2024 FC Proposal
IPA awaited: 1 case	IPA awaited: 2 cases	IPA awaited: 1 case	IPA awaited: 1 case	X	IPA awaited: 1 case	IPA awaited: 8 cases	IPA awaited: 1 case
Final FC awaited: 4 cases	Final FC awaited: 2 cases	Final FC awaited: 5 cases	Final FC awaited: 5 cases	Final FC awaited: 8 cases	X	Final FC awaited: 2 cases	X
9 yrs	8 yrs	7 yrs	5 yrs	4 yrs	3 yrs	2 yrs	1 yr

“Hydrocarbon Professionals of DGH” Posted in State Forest Dept and Environment & Forests Secretariate in Govt of Assam **wef October, 2021** to expedite the pending FC Proposals

Tripura- FC Approval Patterns

Fastest in NER

2015 FC Proposals	2016 FC Proposals	2017 FC Proposals	2019 FC Proposals	2020 FC Proposals	2021 FC Proposals	2022 FC Proposals	2023 FC Proposals	2024 FC Proposal
(6-7) years for <u>Final FC</u> : 2 cases	5 years for <u>Final FC</u> : 1 case	(2.10 - 6.6) years for <u>Final FC</u> : 9 cases	(2.2 – 2.8) years for <u>Final FC</u> : 6 cases	(1.5 – 1.10) years for <u>Final FC</u> : 6 cases	(1.9 – 2.3) years for <u>Final FC</u> : 7 cases	X	X	X
X	IPA in 8 yrs for Loc Dev-2- <u>Final FC</u> awaited Application : 21.04.2016 IPA:30.09.2024	X	X	X	IPA in 1.8 yrs – <u>Final FC</u> awaited: 1 case	IPA in 1.5 yrs- <u>Final FC</u> awaited: 3 cases	X	X
X	X	X	X	X	X	IPA awaited: 1 case	IPA awaited: 6 cases	IPA awaited: 1 case

Six (6) FC proposals of 2015 inside Trishna WLS, approved by SC-NBWL- **Rejected by FC Div in 2022 & 2023**

Forest Clearance Process for O&G E&P activities



Persuasion by us since 2018

Modifying the existing guidelines

**Within the ambit of Forest (Conservation) Act 1980 now named as
Van (Sanrakshan Evam Samvardhan) Adhinyam, 1980 and Rules Thereof**

- **Visit of ONGC sites in upper Assam Fields during (7th to 9th) April, 2019** by **Shri Shrawan Kumar Verma, DIG(FC)** and **Shri Sandeep Sharma, AIG (FC)** : Visit to MRAJ (Expl Loc), MK#7 (Dev Location) and Seismic Survey site at Sarupathar and submitted their report
- **First time elaborate Discussions in Two FAC meetings took place on 23.04.2019 & 31.07.2019 based on reports of DIG(FC) and AIG(FC)- FC guidelines for O&G E&P activities**

FAC's Observations in Two meetings held on 23.04.2019 & 31.07.2019 :

- *“The guidelines related toHydrocarbon sector had been deliberated many times in MoEF&CC but still there are certain issues related to Hydrocarbon sector which needs to be resolved for which MoEF&CC is receiving repeated requests”*
- *“Exploration activities in hydrocarbon sector is equated with the Exploration activities in Coal and Iron sector -This has apparently created many difficulties in obtaining FC approvals”*
- *“Prospecting and Exploration activities in Hydrocarbon Sector cannot be Regulated as per general guidelines meant for Mining of other Minerals under MMDR Act, 1957”*

Committee Formation Accordingly by MoEF&CC to modify FC Guidelines for O&G E&P Sector :

- i) **Chairman** :ADG(FC), MoEF&CC, Delhi
- ii) **Member Secretary** : DIG (FC), MoEF&CC, Delhi
- iii) **Other Members were** : ADG(C), ROs, MoEF&CC, (Shillong, Dehradun) , AIG(FC), MoEF&CC, Delhi, Nodal Officers (FCA), Govt of (Assam , Gujarat , Maharashtra and Telangana) and **Dr Sanjay Deshmukh**, Member FAC

Terms of Reference of the Committee: **Submit a comprehensive recommendations**, after due consultation with OIL, ONGC and Two Private Companies including DGH, MoPNG, Ministry of Mines and Coal- Taking into account of the report submitted by DIG(FC) and AIG (FC)

Under Chairmanship of ADG(FC) a Stakeholder Consultation meeting was organised on 18.06.2019 in presence of OIL, ONGC, DGH, MoPNG, Ministry of Mines and Coal and Private Oil Companies :

JS (Expl), MoPNG requested -Not to treat O&G E&P activities as 'Mining' at par with Coal, Iron etc-

MoPNG was advised to seek legal advice of Ministry of Law and Justice , whether Extraction of Oil & Gas is to be treated as Mining or not

1st NE Regional workshop organized at Shillong in association with MoEF&CC, Shillong on 21.10.2019 attended by 128 Delegates from Central Ministries and Officials from all NE States Including all O&G Companies of NER



“ Recent Advances in Environment & Forest Laws with Special Reference to Oil, Petroleum & Gas Sector”

19 no Recommendations Emerged out of Workshop

Was forwarded to MoEF&CC, Delhi vide RO, Shillong's letter dtd 11th December, 2019



1st Regional workshop on 21st October, 2019

“ Recent Advances in Environment & Forest Laws with Special Reference to Oil, Petroleum & Gas Sector”

NOW



We intend to Draw attention of the House on following Statutory Clearance related issues in Environmental front, in connection with O&G E&P activities in NER which is a big challenge to meet the vision of the Nation to become “Energy Independence by 2047”

→ **“Goa Foundation Case Judgement of Supreme Court”- Not applicable for O&G E&P activities, but still several FC Proposals are Rejected (“Ban of Mining Activities” inside PA or within 1 Km from boundary of the PAs)**

→ **12 issues need to be reconsidered related to FC approval process under Van (Sanrakshan Evam Samvardhan) Rule, 2023 introduced wef 01.12.2023**

→ **Discussion on FC & EC related 24 Pain Point Issues in Sequential manner -Based on their Impacts on O&G E&P Activities**

→ **Discussion on Two Long Pending FC/EC Proposals in NER**

Salient Information- Upstream Oil & Gas E&P related Activities

- **Deep Underground** Hydrocarbon Exploration activities
- Drilling of a Bore hole of max 26” Dia (**Surface Impacts**)
- 2-3 Ha forest land requirement per well (in most of the cases) including approach roads
- Depth of well varies generally from 2 Km to 3 Km
- It takes 2-3 months to drill a well
- “Site Restoration Policy” is in place
- **Surface Establishments can co-exist within PEL & PML Blocks (need not be Encroachment Free)**- As the Reservoir can be accessed using ERD/HDD/Deviational Technologies
- **PEL and PML Blocks are never fenced-** Encroachments are common phenomenon
- **Only 1% to 2 % of the Block area is used for O&G E&P activities**



O&G E&P activities doesn't adversely impact the surrounding Environment

135 years old Digboi Field of OIL –More than 1,000 wells Drilled since 1889



**1st Well in Asia in 1889
and 2nd in the world**



**5.3 sq Km Digboi Town
“ Oil City of Assam ”**



Environmental Impacts from Coal/ Iron Mining and O&G E&P Activities



Onshore Drilling sites of OIL in NER



July, 2019

Land
Subsidence
study

Done by OIL

Through
**National
Remote
Sensing
Centre**
(NRSC) of
Indian Space
Research
Organisation
(ISRO)
Hyderabad



Arunachal Pradesh

Oil & Gas E&P Activities doesn't cause any Land Subsidence Effect

Study by :NRSC-ISRO in July,2019 for OIL's Upper Assam and Arunachal Pradesh Fields



“Ban on Mining Activities” inside PAs and within 1 Km from the Boundary of the PAs in compliance to **“Goa Foundation Case Judgement”** of Supreme Court dtd 21.04.2014 in IA-1000 of WP (C) No. 202/1995 followed with last order of Supreme Court dtd 26.04.2023

Is not applicable for O&G E&P activities

Justifications in Subsequent Slides

Extraction of Natural Gas / Oil Can not be considered as **‘Mining’** in terms of Hon'ble Supreme Court order dated 04.08.2006 in IA 1000 in WP (C) No. 202/1995

Operational Frameworks: O&G E&P Activities and Conventional Mining Activities

- **Distinct Constitutional, Legislative and Operational frameworks prevails-** Extraction of “Mineral Oils” (Petroleum Oil & Natural Gas) governed under Oilfields (Regulation and Development) Act, 1948 and Mining of other “Minerals” governed under First Schedule of MMDR Act, 1957

[Oilfields \(Regulation and Development\) Amendment Act, 2024 passed in Rajya Sabha on 03.12.2024 clarifies that Extraction of “Mineral Oils” \(Petroleum Oil & Natural Gas\) is not ‘Mining’ activities](#)

- **Regulations 3 (aa) & 3(b) of MMDR Act, 1957 Excludes** “Mineral Oil (Natural Gas and Petroleum Oil)” from the purview of the MMDR Act, 1957
- **Under EIA Notification, 2006**, Oil & Gas E&P activities are considered as **“Industrial Project”** under schedule 1(b) and **“Mining Projects”** are categorised in EIA Notification under schedule 1(a)

- **Under purview of Forest Regulations only**, O&G E&P Activities are presently treated at par with Coal, Iron and other mining activities performed under purview of MMDR Act, 1957, which attracts **“Goa Foundation Case Judgement”** of S’Court dtd 21.04.2014 in IA-1000 of WP (C) No. 202/1995 followed with its subsequent order dtd 26.04.2023

Goa Foundation Case Judgement Not Applicable for OIL's ERD Project

Supreme Court (07.09.2017)- on OIL's ERD Project



'Goa Foundation Case' judgement dtd 21.04.2014 is **not applicable for OIL's ERD Project (O&G E&P activities)** since 'Goa Foundation Case' judgement **is applicable only to Open Cast/ Surface Mining Leases granted under MMDR Act, 1957** and Oil Mining Leases are granted under Oilfields (Regulation and Development) Act, 1948

Supreme Court's Final Judgement dtd 07.09.2017 in OIL's ERD Project beneath Dibru-Saikhowa NP, Assam



Supreme Court awarded Final Judgement on 07.09.2017 for OIL's ERD

Project beneath Dibru-Saikhowa NP, Assam based on followings:

- i) Recommendation of CEC's Report dtd 09.05.2016 against IAs 3934 of 2016 and IA 3788 of 2014 in WP(C) no 202 of 1995- CEC Clarified in Para (6) and (7) of the Report that, 'Goa Foundation Case' judgement is not applicable for ERD campaign of OIL to drill 7 wells to access Hydrocarbon Reservoir beneath Dibru-Saikhowa NP in Assam and use of this technology in no way adversely Impact the Flora and Fauna around the NP**

- ii) SC-NBWL approved the Project in its 44th meeting held on 29.07.2017 in conformity to Supreme Court's order dtd 05.10.2015 and Supreme Court's Directive to SC-NBWL vide its order dtd 28.07.2017 for OIL's ERD Project**

Supreme Court's Final Judgement dtd 07.09.2017

Against OIL's ERD Project in IAs 3934 of 2016 and IA 3788 of 2014

Came in a Sequential Manner

In Subsequent to It's

Previous Various Directives to SC-NBWL/MoEF&CC

vide Six Other Orders Dtd

10.05.2016, 03.03.2017 , 13.04.2017, 09.05.2017, 17.07.2017 and 28.07.2017

- **Supreme Court's order (1) dtd 10.05.2016 (on receipt of CEC's Report dtd 09.05.2016):**
Directed SC-NBWL for consideration of OIL's ERD Project for due approval or submit a report to the Court, if found the proposal is not worth for Acceptance/Approval
- **Supreme Court's orders (2&3) dtd 03.03.2017 & 13.04.2017 :** Directed SC-NBWL to furnish Report within 4 weeks time against OIL's ERD project in reference to its earlier order dtd 10.05.2016
- **Supreme Court's order (4) dtd 09.05.2017 :** Imposed a fine of Rs 25,000/- to MoEF&CC, since no report was forwarded by MoEF&CC to the Apex court against its previous Three orders
- **First time OIL's ERD proposal was listed for hearing in the 42nd meeting of SC-NBWL held on 15.05.2017** and Chief Wildlife Warden (CWLW), Assam was directed to send his report latest by 31.05.2017- **CWLW vide his report dtd 24.05.2017 negated the OIL's proposal** which MoEF&CC submitted to Supreme Court through affidavit on 06.07.2017 and OIL submitted reply affidavit to Supreme Court on 12.07.2017
- **Supreme Court's order (5) dtd 17.07.2017 :** Directed Member Secretary, SC-NBWL to resolve the OIL's ERD Proposal issue once for all by convening a meeting on 24th July,2017 at 11:00 hrs by inviting OIL, Commissioner & Secretary (Env & Forests), Govt of Assam, Chief Wildlife Warden, Assam

- **Member Secretary, SC-NBWL convened a meeting on 24.07.2017 under Chairmanship of DGF&SS, MoEF&CC** which was attended by **Addl Chief Secretary, GoA, Chief Wildlife Warden, Assam** including OIL and it was directed to CWLW to send his revised report at the earliest so that **OIL's proposal can be listed/approved in SC-NBWL meeting scheduled on 29.07.2017**
- **Chief Wildlife Warden, Assam recommended OIL's ERD Proposal on 26.07.2017, which was submitted by MoEF&CC to Supreme Court on 27.07.2017 intimating that same will be taken up on 29.07.2017**

➤ **Supreme Court's order (6) dtd 28.07.2017: Directed SC-NBWL to decide on the ERD proposal of OIL in its scheduled meeting on 29.07.2017 and intimate the Court its decision before next hearing scheduled on 14.08.2017**

- **SC-NBWL approved OIL's ERD project in its 44th meeting held on 29.07.2017 in conformity to Supreme Court's order dtd 05.10.2015 and in compliance to Supreme Court's directive vide order dtd 28.07.2017**

➤ **Supreme Court vide its Final Judgement dtd 07.09.2017 approved the OIL's ERD project based on CEC's Report dtd 09.05.2016 (recommended non-applicability of "Goa Foundation Case Judgement") and approval of the same by SC-NBWL in its 44th meeting held on 29.07.2017**

In spite of having all Approvals under the prevailing Regulations & Legal Provisions followed with 6 Directives from Supreme Court to SC-NBWL from 10.05.2016 to 28.07.2017- ERD Project of OIL was Rejected by FAC

Involvement of OIL's ERD Project: Use of 0.069 Ha forestland at depth 3.9 km to 4 km beneath the Forest Surface of Dibru-Saikhowa NP without Diversion of any forest lands or any activities inside of Dibru-Saikhowa NP

National Loss : (As of 2017)

- 700 KL Crude Oil production per day was targeted from 7 ERD wells
- Rs. 450 crores of foreign currency intended to save per annum towards import of crude oil
- Rs 225 crores annually likely to contribute to the State and Central exchequer in the form of taxes
- The FC Proposal applied on 4th September, 2017 Rejected by FAC on 4th July, 2024 (FC Proposal No: FP/AS/MIN/28749/2017) -Even when it was confrd through approvals from SC-NBWL and Supreme Court that, 'Goa Foundation case Judgement' is not applicable for OIL's ERD Project
- 01.08.2024: CMD, OIL, vide DO letter requested DGF & SS, MoEF&CC for Re-consideration of FAC's decision on rejection of OIL's ERD Project
- 02.08.2024 :Asst. Inspector General of Forests vide his letter intimated Special Chief Secretary (E&F), Govt of Assam that, OIL's ERD Project has been Rejected by FAC on 04.07.2024
- 11.11.2024 : Under Chairmanship of DGF&SS, it has been decided that, **OIL will be allowed to drill one Well out of Rejected 7 ERD wells for Study purpose by WII, Dehradun**, without any Commercial activity in that Well

Other References Available on Records with the Ministry

Extraction of Natural Gas / Oil Can not be considered as
‘Mining’ in terms of Hon'ble Supreme Court order dated
04.08.2006 in IA 1000 in WP (C) No. 202/1995

Extraction of Natural Gas / Oil Can not be considered as 'Mining' in terms of Hon'ble Supreme Court order dated 04.08.2006 in IA 1000 in WP (C) No. 202/1995

▪ **Legal Opinions given by Solicitor General of India on 14th May, 2021 -**

Based on this SC-NBWL approved 7 Projects inside Trishna WLS in Tripura in its 65th meeting **after their provisional approval in 52nd meeting**

▪ **Legal Opinions given by Addl Solicitor General of India on 22nd June, 2017**

-Based on this SC-NBWL approved Projects within 1 km from PA in Assam in its 43rd meeting **which previously was banned in its 42nd meeting**

▪ **Legal Opinions given by Advocate General of Tripura on 6th May, 2019 -**

Based on this SC-NBWL approved 7 Projects inside Trishna WLS in Tripura in its 65th meeting **after their provisional approval in 52nd meeting**

Supreme Court vide its order dtd 05.10.2015 Empowered Standing Committee of National Board for Wildlife (SC-NBWL) to approve Projects inside the PAs in Conformity to “Goa Foundation Case Judgement” and its other orders dtd 14.02.2000, 16.12.2002, 13.11.2000, 9.5.2002, 25.11.2005 and 14.09.2007 etc

Based on above order of Supreme Court- SC-NBWL approved following Projects:

- i) Projects within 1 Km from the boundary of the PA in Assam rejected by SC-NBWL in its 42nd meeting (15.05.2017), considering as ‘Mining’ activity and applicability of Goa Foundation case Judgement with Directives of “Plugging Permanently” all the 4 Expl and 2 Dev Wells within 1 km from the PA –Was approved by SC-NBWL subsequently in its 43rd meeting (27.06.2017), considering such as non-mining and non-applicability of “Goa Foundation Case Judgement
- ii) OIL’s ERD Project deep beneath the forest surface of PA in Assam was approved in SC-NBWL’s 44th meeting (29.07.2017)
- iii) Seven Projects inside PA in Tripura was Provisionally Approved First in SC-NBWL’s 52nd meeting (10.01.2019) was given Final Approval in SC-NBWL’s 65th meeting (24.09.2021) after obtaining due Legal Opinions from SGI (14.05.2021) and Advocate General of Tripura (06.05.2019), confirming that Extraction of Oil & Gas is not as Mining
- iv) Approved two project Inside PA in Tripura in SC-NBWL’s 71st meeting (29.12.2022) in conformity to Supreme Court’s order dtd 05.10.2015

SC-NBWL approved these Four projects in conformity to Supreme Court’s order dtd 05.10.2015 after due confirmation that, O&G E&P activities can not be considered as ‘Mining’ in terms of Hon’ble Supreme Court order dated 04.08.2006 in IA 1000 in WP (C) No. 202/1995 and thus ‘Goa Foundation Case’ judgement dtd 21.04.2014 is not applicable for O&G E&P activities

With all these References, we Request Ministry for Reconsideration of FC Proposals Rejected by FC Division/FAC for following Three cases which were approved by SC-NBWL in conformity to “Goa Foundation Case Judgement” and in conformity to Supreme Court’s order dtd 05.10.2015

- 1) Rejected in 2024: ERD FC Proposal of OIL to drill 7 wells beneath Dibru-saikhowa NP Assam, approved by SC-NBWL in its 44th meeting on 29.07.2017 and Supreme Court also accorded its approval for it vide order dtd 07.09.2017- **FAC rejected the proposal in the meeting held on 4th July, 2024** ([FP/AS/MIN/28749/2017](#))**
- 2) Rejected in 2023: 2 FC proposals of ONGC for drilling locations TIDG & TIDC inside Trishna WLS, Tripura, approved by SC-NBWL in its 71st meeting held on 29.12.2022 **returned to State vide RO, Shillong’s letter dtd 30.08.2023** ([FP/TR/MIN/13523/2015](#) and [FP/TR/MIN/13520/2015](#))**
- 3) Rejected in 2022: 4 FC proposals of ONGC for drilling locations TIAC, TIDF, TIDE & TIDA inside Trishna WLS, Tripura, approved by SC-NBWL in its 65th meeting held on 24.09.2021 **returned to State vide RO, Shillong’s letter dtd 11.11.2022** ([FP/TR/MIN/13529/2015](#), [FP/TR/MIN/13527/2015](#) , [FP/TR/MIN/13525/2015](#) and [FP/TR/MIN/13524/2015](#))**

**“Mining” related all OM /Guidelines
under purview of the ‘Forest Regulations’**

are Exclusively framed specific to MMDR Act, 1957 only

and Extraction of O&G E&P activities are equated at par with Coal, Iron and
other Mining activities performed under purview of MMDR ACT, 1957,

When MMDR Act, 1957 doesn't include ‘Mineral Oil (Oil & Gas)’

- Supreme Court's order dtd 08.08.2014 in conjunction with CEC's report dtd 25.02.2014 against IA-3627 of 2013, well clarified in Para 6(vi) and Para (8) of CEC's Report that- Oil & Gas E&P activities Grossly Differ Materially from the "Mining of Minerals" under provision of the MMDR Act, 1957- It also spelt clearly that, Guidelines issued by MoEF&CC from time to time regarding payment of the NPV etc in respect to Mining Leases granted under the MMDR Act, 1957 only and **no such guidelines have so far been issued for Oil PML blocks granted under purview of Petroleum and Natural Gas Rules, 1959** – **Based on this only 1st guideline dtd 24.06.2015 was issued by the Ministry on payable NPV @ 2% for forestland in O&G PML Blocks**
- **FC Validity for O&G E&P Projects are stipulated at par with Mining Leases granted under purview of MMDR Act, 1957-** When O&G PEL & PML blocks are granted under purview of **Petroleum and Natural Gas Rules, 1959**

Forest Advisory Committee also Realized in its meetings held on 23.04.2019 and 31.07.2019 that, Equating O&G E&P Activities with Coal, Iron and other Mining activities is not Justified:

- **Quotes from MoM-** The guidelines related to Exploration and Developmental activities in the forest areas for hydrocarbon sector **had been deliberated many times in MoEF&CC but still there are certain issues related to Hydrocarbon sector which needs to be resolved** for which MoEF&CC is receiving repeated requests from stakeholders of Hydrocarbon sectors for appropriate modifications in the existing guidelines of MoEF&CC
- **Quotes from MoM-** Exploration activities in hydrocarbon sector is equated with the Exploration activities in Coal and Iron sector for the purpose of Diversion of forest land under the provisions of FCA 1980 -**This has apparently created many difficulties in obtaining FC approvals**
- **Quotes from MoM-** Prospecting (including Seismic Surveys) and Exploration activities in Hydrocarbon Sector **cannot be Regulated as per general guidelines meant for Mining of other Minerals under MMDR Act, 1957**

Request for Consideration by Ministry:

- 1) **MoEF&CC may consider to make separate provisions and guidelines for granting Forest Clearance to Oil & Gas E&P projects, as requested by the Secretary, MoPNG to the Secretary, MoEF&CC vide hid DO letter dtd 09.01.2020 after obtaining due opinion from Department of Legal Affairs- Instead of Equating Oil & Gas E&P activities at par with Coal and other Mining activities performed under purview of First Schedule of MMDR Act, 1957**
 - i) With implementation of Oilfields (Regulation and Development) Amendment Act, 2024 (**already passed in Rajya Sabha on 03.12.2024 and awaited passing the same in Lok Sabha**), **O&G E&P Activities no more by default also can be considered as 'Mining' at par with coal, iron etc**
 - ii) Framing of separate FC Regulations for O&G E&P activities may be considered **in line with the Oil Mines Regulation, 1984 (amended in 2017) formulated under Mines Act, 1952** to monitor Safety and Labor Welfares related issues associated with O&G E&P Activities **-Similar modalities may be thought of under purview of Van (Sanrakshan Evam Samvardhan) Adhinyam, 1980**

Request for Consideration by Ministry:

2) To consider for amendment of OM dtd 12.09.2023 on 'FC Exemption for ERD Projects' – FC may be exempted for O&G ERD Projects beneath Forest Surfaces of PAs / ESZ areas of PAs Sensitive Corridors and Other Wildlife Sensitive areas in line with exemption permitted for RFs vide OM dtd 12.09.2023

3) Reconsideration for approving following FC Proposals Approved by SC-NBWL and Rejected by FC Division/FAC considering applicability of 'Goa Foundation Case' at par with coal, iron etc:

- i) **Rejected in 2024** (FP/AS/MIN/28749/2017) : ERD FC Proposal of OIL to drill 7 wells beneath Dibru-Saikhowa NP Assam, approved by SC-NBWL in its 44th meeting on 29.07.2017 and Supreme Court also accorded its approval for it vide order dtd 07.09.2017- **FAC rejected the proposal in the meeting held on 4th July, 2024**
- ii) **Rejected in 2023** (FP/TR/MIN/13523/2015 and FP/TR/MIN/13520/2015) : 2 FC proposals of ONGC for drilling locations TIDG & TIDC inside Trishna WLS, Tripura, approved by SC-NBWL in its 71st meeting held on 29.12.2022 and returned to State vide RO, Shillong's letter dtd 30.08.2023 -**Rejection of the proposals by FC Division**
- iii) **Rejected in 2022** (FP/TR/MIN/13524/2015, FP/TR/MIN/13525/2015, FP/TR/MIN/13527/2015 and FP/TR/MIN/13529/2015): 4 FC proposals of ONGC for drilling locations TIAC, TIDF, TIDE & TIDA inside Trishna WLS, Tripura, approved by SC-NBWL in its 65th meeting held on 24.09.2021 and returned to State vide RO's letter dtd 11.11.2022 -**Rejection of the proposals by FC Division**



**CONSOLIDATED GUIDELINES AND
CLARIFICATIONS**

issued under

**VAN (SANRAKSHAN EVAM
SAMVARDHAN) ADHINIYAM, 1980**

and

**VAN (SANRAKSHAN EVAM
SAMVARDHAN) RULES, 2023**



Government of India

Ministry of Environment, Forest and Climate Change

Governing Tools under New FC Regulations

Consolidated Guidelines and Clarifications

Released by MoEF&CC on

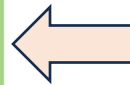
29th December, 2023

under provision of

Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980

and

Van (Sanrakshan Evam Samvardhan) Rules, 2023



- Changes in Forest Regulations for O&G E&P Activities started from 2019 with formation of Committee etc and continued till 2022
- FC Approval Process mechanisms **reversed in totality to a different regime with effect from 01.12.2023** by enacting Van (Sanrakshan Evam Samvardhan) Rule, 2023
- Van (Sanrakshan Evam Samvardhan) Rule, 2023 suppressed **1½ years old Forest Conservation Rule, 2022** published through gazette dtd 28.06.2022 and made effective from 18.07.2022

Impact of new Van (Sanrakshan Evam Samvardhan) Rule, 2023 is more in NER as compared to ROI - It has grossly impacted O&G E&P activities in NER

Van (Sanrakshan Evam Samvardhan) Rule, 2023

Needs Revisit on 12 issues

Which we will discuss now

1) FC approval process transferred from RO to Centre

2) SIR from RO required for every FC proposals

3) Stage-I FCs will be Null and Void if there is **Delay more than 2 years** in Submitting Stage-I FC Compliance Report

4) 'Change in Land Use' can't be approved any more by NO(FCA)- Can be approved from Centre only

5) State Govt can't grant "**Working Permission**" for Linear Projects without compliances of **FRA, 2006** and **PRF notification of offered CA land**

6) 7.5 mtr "Safety Zone" mandated for all FCs

7) Seismic Survey inside PAs requires Approval from SC-NBWL

8) WMP @ 2% of "Total Project Cost" should be to "Proportionate Forestlands involved"

9) WMP preparation in consultation with WII, Dehradun

10) Land below 5 ha not acceptable for CA purposes unless it is adjacent to some PA or RFs

11) FC proposals De-listed Automatically after Lapse of 90 days against EDS query can't be re-listed by UAs

12) PSC introduced for projects > 5 Ha

1) Entire Authority for FC approvals for O&G E&P sector (Irrespective of Areas) has been now shifted to Centre wef 01.12.2023 -All Proposals Requires deliberations in FAC along with SIR from ROs

FC Approval Process Prevailed Earlier

FC Approval Process Introduced wef 01.12.2023

Proposals up to 40 Ha was forwarded to ROs

State Govt now forwards all proposals to Centre

Proposals > 40 Ha only was referred to FAC

Now all proposals are apprised before FAC for IPA

ROs could grant IPA up to 40 Ha in concurrence with REC and ROHQ

Hon'ble Minister (Env & Forests)'s approval required for grant of IPA from Centre

RO could grant Final FCs up to 40 Ha

IG (Forests) from Centre only can grant Final FC

SIR from RO required for > 100 Ha only

SIR from RO mandatory for all O&G projects irrespective of Areas

FC Rules, 2022 published through gazette dtd 28.06.2022 and made effective from 18.07.2022- Delegated

independent Power ROs to approve O&G E&P Projects up to <= 5 ha area, even without concurrence of ROHQ-

1½ years old FC Rules, 2022 Revoked wef 01.12.2023 after enactment of Van (Sanrakshan Evam Samvardhan) Rules, 2023

2) ROs has to carry out site inspection for all O&G FC proposals (irrespective of areas) – Previously ROs used to inspect the site only for > 100 Ha area

Impacts due to Site Inspection by ROs for each individual FC proposals for O&G E&P activities :

- **Delay in SIR:** The FC locations in NER mostly lies in remote challenging terrains- **OCKA (Nov'23)**
- **Encroachments in Drilling locations** involving area < 5 Ha forest lands is common in NER– **ATR against the Erring Officials** under Indian Forest Act, 1927 and **Removal of Encroachments** would be called for after RO's Inspection– **Both are just impossible tasks- Cases are pending in NER for last 5-6 yrs**
- **Scope of Resolving Encroachment issues with Tripartite mutual discussions by paying compensation will be eliminated**

Under provision of the new Regulation: SIR from CF is required in case the area is >40 ha and SIR from NO is required in case the area is >100 ha – **Hence SIR from ROs should also be >100 ha only**

3) Approval of Stage-I FCs will be Null and Void [under Rule 11(10)] if there is Delay more than 2 years in Submitting Stage-I Compliance Report for getting Final FC (relaxation available for > 1,000 Ha area)

- **This Timeline was Increased from 3 yrs to 5 yrs vide OM dtd 23.06.2021 because of obvious reasons, which Now Reduced to 2 years through new FC Regulations enacted wef 01.12.2023**

Submission of Stage-I FC Compliance Report may not be possible within 2 years for following Constrains:

- **RoFR Certificate from DC/DMs in compliance to FRA, 2006 (Delay for resolutions from Gram Sabha and Forest Right Committees)**
- **PRF Notification of CA land in State Gazette**
- **Preparation of Wildlife Management Plan (WII, Dehradun and approval of CWLW)**
- **“Encroachments” in forest lands (Common Problem in NER)- Constrains in Erection of Boundary Pillars in compliance to IPA and submission of Compliance Report**

Request: Timeline of 5 years prevailed for converting the Stage-I FC to Final FC need to be Reinstated

4) Forest land already diverted during Exploration drilling and proposed to use for future Developmental activities- The 'Change in Land Use' permission given since 2019 by NO(FCA) of the State in consultation with RO/REC has been revoked -The "Change in Land use" proposals now need to be applied on-line wef 01.12.2023 and the approval is granted from Centre only, considering merit of the proposal case to case basis

- It was decided in FAC's meetings held on 23.04.2019 and 31.07.2019 that, UAs once diverted forestland during "Exploration Phase" with due approval under FCA, 1980 can Re-use the same land for future "Developmental works" without going through repetitive FC approval Process and such 'Change in Land use' can be approved by Any /Some Govt Agency**

Based on this, since 2019, Offline application in "Form-E" was submitted to the Nodal Officer (FCA) of the concerned State and same was discussed in REC meetings of RO and approvals for 'Change in Land Use' used to be granted subsequently by the Nodal Officer (FCA), which has now been shifted to Centre

Decision nos:3(a) & 3(b) of Agenda Item no(13) of FAC meeting dtd 23.04.2019 and Decision no(7) of Agenda Item no (7) of FAC meeting dtd 31.07.2019 may be referred in next slides

5) **“Working Permission” for Linear Projects** (O&G Pipelines, Roads, Railway Lines, Transmission Lines, Slurry Pipeline, Conveyor Belt etc) - State Govt was allowed to grant such prior to grant of the Final FC after grant of Stage-I FC against deposition of payable money towards CA , NPV and cost towards WLMP etc

Under New Regulation - “Working Permission” can’t be granted **unless** FRA, 2006 is complied and PRF notification of CA land is completed [Regulation 10 (10) & Chapter-4, Regulation 4.1 / Item no (12) of S.O.5074 (E) of Van (Sanrakshan Evam Samvardhan) Rules, 2023]

- **FRA, 2006 compliances** and **Protected Forest Notification of CA land** are submitted along with Stage-I FC Compliance Report for grant of Final FC followed with formal handing over of Forest Lands by State/UT Govt to the UAs
- **One would not require “Working Permission”**, if RoFR certificate and Protected Forest Notification of CA land are readily available for **Linear projects** as PPs then can directly get Final FC **after submission of Stage-I FC Compliance Report – Obtaining RoFR certificates in compliance to FRA, 2006 is a challenging task for the ‘Linear Projects’ passing through several Villages** – Hence **“Working Permission”** helps to a great extent in executing the **Linear Projects like O&G Pipelines etc**

“Working Permission” defined in Regulation 2(1)(v) of Van (Sanrakshan Evam Samvardhan) Rules, 2023 as follows:

“Working Permission” means Permission Granted to Linear Projects before Final Approval to Mobilise the Resources to Commence the Preliminary Project Work other than Black Topping, Concretisation, Laying of Railway Tracks, Charging of Transmission Lines, etc. or as specified in the In-Principle Approval (IPA)

6) Under the new Regulations wef 01.12.2023

Allotment of Double the Amount Degraded Forest Lands to the Central/ State Govt/ PSU organisations by the State Forest Depts for CA purposes , on receipt of Payments was stopped wef 01.12.2023

Unless it is Certified by the Competent Authority of the concerned State/ UT declaring that, there is no NFL available in the entire State/ UT for CA purposes

However MoEF&CC vide Gazette Notification dtd 20.09.2024 followed with OM dtd 17.12.2024 reverted back to the old system of allotment of Double the Amount Degraded Forest Lands by the State Forest Dept to the Central/ State Govt/ PSU organisations for CA purposes

(under “Exceptional Circumstances” stipulated in Gazette dtd 20.09.2024 is omitted in the guideline dtd 17.12.2024)

7) 7.5 mtr “Safety Zone” mandated vide OM dtd 03.11.2023 for each individual O&G FC proposals for PEL as well as PML blocks need to be Reconsidered/ Revoked

- **Para 7.9 of the Handbook of Forest (Conservation) Act, 1980**, issued by the Ministry on 28.03.2019 stipulates that, 7.5 meter wide Peripheral Strip to be maintained in the form of ‘**Safety Zone**’ along the Inner Boundary of the Mining Leases Granted under purview of First Schedule of MMDR Act, 1957 - **Which doesn’t accommodate O&G E&P activities**
- **PEL is a License (not Mining Lease)** and **O&G PML Blocks are never Fenced** as only 2%-3% of the area is used
- **All Safety distances are maintained in Well Plinth areas based on OISD, DGMS Safety Standard/ Guidelines etc**
- It is not justified to cut trees during diversion of forest lands and then again plant trees for creating Green Belt in ‘Safety Zone’

8) O&G Seismic Survey inside the PAs now requires Approval from SC-NBWL with Recommendation from State Board for Wildlife [Rule 6.1(5)- Chapter-6] of Van (Sanrakshan Evam Samvardhan) Rules, 2023

- O&G Seismic Survey inside the PAs was permitted with permission from the Chief Wildlife Warden under provision of Para 6.4 of Chapter-6 (Part-B) of the Handbook of comprehensive guidelines of FCA, 1980 released by MoEF&CC vide letter dtd 28.03.2019



Abstracts from Para 6.4 of Chapter-6 (Part-B) of the FCA Handbook Reproduced below



Para 6.4 of Chapter-6 (Part-B) of the FCA Handbook: Surveys to be undertaken in connection with **Development Projects** such as Transmission Line, Hydro-electric Projects, **Seismic Survey**, Exploration for Oil Drilling, Mining etc. **in Wildlife Sanctuaries, National Parks and Sample Plots demarcated by the Forest Department also Will Not Attract the Provisions of the FC Act** as long as these Surveys do not Involve any Clearing of Forest or Cutting of Trees and Operations area Restricted to Cleaning of Bushes and Lopping of the Branches for purpose of sighting. **Permission from the Chief Wildlife Warden**, as Provided in the said O.M. No.6-133/2014(part) dated 26th September 2014 issued by the Wildlife Division in the MoEF&CC, **Will However be Required to be Obtained for such Activities to be Carried out in Wildlife Sanctuaries and National Parks.** The Chief Wildlife Warden should exercise the mandate provided in section-28 of WLPA, 1972 and consider Prescribing Appropriate Guidelines for Application and Safeguards to be followed for Grant of Permission to Enter Protected Areas **for Survey/Investigation** if No Physical Disturbance on the PA is Contemplated.

Wildlife Clearance from SC-NBWL for 3D Seismic Survey inside the PA awaits recommendation from SBWL for the OALP Block of ONGC at Rajnagar, Tripura against FC Proposal No (FP/TR/SRY/456223/2023)- CWLW recommended the proposal on 02.05.2024 and awaits for Discussion in SBWL

9) 2% of “Total Project Cost” to be Paid towards Wildlife Management Plan (WMP) and/or 0.5% towards Soil and Moisture Conservation Plan (SMCP) for all Forest Clearances (OM dtd 08.06.2022) - This is in addition to payable NPV @ 2% during grant of PML in Forest Lands

- Payable WMP cost should be to the “Proportionate Forestlands involved” for O&G E&P Projects and not the “Total Project Cost” (like it is considered for Linear Projects vide OM dtd 17.01.2023)

10) Land below 5 ha not acceptable for CA purposes unless it is adjacent to some Protected Areas or Reserve Forests (OM dtd 22.05.2019) - Can it be reviewed to accept CA land below 5 Ha also for general cases, as getting suitable CA land in NER is a big challenge

11) FC Proposals getting De-listed Automatically after Lapse of 90 days against the EDS query raised by the Processing Authority can be Re-listed by the following Authorities only as the case may be after submission of on-line request : UA can't Re-list the same the way such facility available in PARIVESH portal for EC Proposals

Re-listing Power Vested under Regulation (1.13) of Chapter-1 of Van (Sanrakshan Evam Samvardhan) Rules, 2023 to :

- **Nodal Officer (FCA) of the concerned State/UT**
- **Inspector General of Forests (Forest Conservation) at Centre**
- **DDG (Central) at Regional Offices of MoEF&CC**

De-listed EC proposals can be Re-listed by UAs in PARIVESH- May be considered for FC Proposals also

Though raising - It is not that much issue of concerns as most of the O&G E&P Projects are < 5 Ha only

12) If possible to consider for eliminating PSC for projects > 5 Ha- It may help to avoid delays

- **‘Proposal ID’ will be generated only when it is Accepted by PSC (for Projects > 5 Ha)**
- **Proposal Delisted by PSC during Screening of Application can be Re-Listed one time only- After that Fresh FC Proposal to be submitted**

Project Screening Committee (PSC) - under Regulation (8):

- **To Examine the Completeness of the FC proposals of > 5 Ha**
- **Recommends/ Rejects the Proposal before the State/UT Government after field verifications**

Project Screening Committee Meeting- **Quorum of minimum Three to be met**, out of the following Five Officials:

(Minimum 2 meetings in a month prescribed)

- Nodal Officer (FCA) – Chairperson**
- DFO in the office of Nodal Officer (FCA)- Member Secretary**
- Concerned **District Collector** or his/her Representative (**not below the rank of Deputy Collector**) –Member
- Concerned **Chief Conservator of Forests/ Conservator of Forests** – Member
- Concerned **Divisional Forest Officer-** Member

Though not accommodated in the new Regulations – But few conditions stipulated in the FC approvals from Centre for O&G Upstream Projects needs to be Amended against following 8 proposals approved from Centre:

- No Work shall be allowed After Sunset– O&G Drilling is a continuous process on 24x7 basis for 2-3 months in any location- **Hence the condition of “ No Work after Sunset” need to be amended**
- Wildlife Management Plan (WMP) to be prepared in consultation with WII, Dehradun prior to its approval from CWLW of the State/UT : **WMP prepared by the IFS officials of the State/UT Government may be accepted for approval by the CWLW without insisting for its approval from WII, Dehradun (in order to avoid delay)**

- 1) **ONGC, Jorhat** :FC Proposal no FP/AS/MIN/35222/2018 (**Loc KSAI** for diversion of 2.1 Ha forest land)
- 2) **ONGC, Jorhat** :FC Proposal no FP/AS/MIN/113884/2020 (**Loc TLAB** for diversion of 1.781 Ha forest land)
- 3) **ONGC, Jorhat** : FC Proposal no FP/AS/MIN/87902/2020 (**Loc SPAA** for diversion of 1.731 Ha forest land)
- 4) **ONGC, Jorhat** : FC Proposal no FP/AS/MIN/113896/2020 (**Loc DPAB** for diversion of 1.889 Ha forest land)
- 5) **ONGC, Jorhat** : FC Proposal no FP/AS/MIN/139315/2021 (**Loc ELAJ** for diversion of 2.2091 Ha forest land)
- 6) **ONGC, Jorhat** : FC Proposal no FP/AS/MIN/139446/2021 (**Loc SUAD** for diversion of 1.8212483 Ha forest land)
- 7) **ONGC, Jorhat** : FC Proposal no FP/AS/MIN/140108/2021 (**Loc TLAA** for diversion of 1.76783 Ha forest land)
- 8) **ONGC, Silchar** : FC Proposal no FP/AS/MIN/47775/2020 (**Loc TNAA** for diversion of 6.09 Ha forest land)

EC/FC & WLC related 24 Pain Point Issues

Related to O&G E&P Activities in NER

1) Ongoing vicious cycle between “Recommendation of Provisional EC by EAC subjected to submission of Stage-I FC ” and its “Nullification” when approached with Stage-I Forest Clearance after its approval in 4-5 yrs time

- **EIA report and PH proceedings more than 3 years old will not be accepted** -UAs have to apply for fresh EC- MoEF&CC’s OM dtd 08.06.2022- **Getting IPA in NER takes 4-5 years time**
- **Delay in submission of Stage-I FC for more than 12 months after provisional recommendation of EC (extendable by another 6 months), the EC process need to be started afresh on de-novo basis**- MoEF&CC’s OM dtd 09.09.2011

Request for Consideration:

- **Validity of EIA report and PH proceeding may be considered for increasing to 5 years in place of 3 years- As it takes 4/5 years to obtain IPA in NER**
- **Timeline for Submission of Stage-I FC within (12+6) months for the ECs recommended provisionally – May be considered for increasing to 5 yrs as EC Validity has been increased now from 7 years to 10 years**

2) Uniform Consent Fee and Grant, Refusal or Cancellation of Consent to Establish or Consent to Operate proposed by MoEF&CC vide Draft Gazette Notification GSR 423 (E) dtd 19.07.2024

Request for Re-consideration of following Points:

- The Consent Fee structure formula **(CF=CI*SF*PIF)** will lead to increase in Fees **more than 10 times** from the existing Consent fee structure [CF (Consent Fee), CI (Capital Investment), SF (Scale Factor) and PIF (Pollution Index Factor)]
 - **Authorising SPCBs/PCCs** to set a consent fee **up to 20% higher** than the estimated fee, based on local environmental issues and conditions - **Suggest to remove the flexibility for SPCBs/PCCs**
 - Consent fee for CTE shall be Twice the Annual consent Fee- **Fees Calculation basis not clear**
- A Tiered Fee system based on Project Scale and Potential Impact might be a more Equitable Solution
 - A detailed Cost-benefit Analysis need to be done
 - Stakeholder Consultation suggested before the Final Implementation of Uniform Consent Fees

3) 10 Km ESZ area continuing for more than last one and half decades since December, 2006 for 8 PAs in Assam & Arunachal Pradesh- Draft Notifications yet to be Published for 5 cases in Assam and in 3 cases in Arunachal Pradesh

- **Assam (5):** Draft notifications pending for (Dihing- Patkai) NP , [Bherjan– Borjan– Podumoni] WLS and Combined ESZ notifications for (Nambor-Doigurung) WLS , Nambor WLS and Garampani WLS along with ESZ notification of Kaziranga NP
- **Arunachal Pradesh (3):** Draft notification pending for D. Ering Memorial (Lali) WLS and Final Notification pending for Namdhapa Tiger Reserve and Kamlang WLS against combined Draft ESZ Notification published on 10.11.2023
- MoEF&CC may consider as a stop gap measures, to implement CEC's recommendation dtd 20th September, 2012 against IA- 1000 of 2003, with its due endorsement from Supreme Court

In place of prevailing 10 Km ESZ area, CEC recommended ESZ area as follows:

- **100 mtr ESZ area** (PA Size less than 100 sq Km)
- **500 mtr ESZ area** (PA size between 100 sq Km and 200 sq Km)
- **1 KM ESZ area** (PA size between 200 sq Km and 500 sq Km)
- **2 Km ESZ area** (PA size more than 500 sq Km)

Supreme Court's following orders on ESZ & Ban on Mining related to be Taken into account:

16.09.2005, 30.01.2006 (Goa Foundation), 04.08.2006 (T.N. Godavarman), 04.12.2006 (Goa Foundation), 21.04.2014 (Goa Foundation), 11.12.2018, 03.06.2022 and 26.04.2023

4) Separate Procedures and Separate Application Forms to be formulated for Wildlife Clearance approvals of Proposals from SC-NBWL for Projects executed in ESZ areas of the PAs-

- Presently Projects in ESZ area is treated at par with project executed inside the PAs
- Recommendation from State Board for Wildlife (SBWL) for ESZ areas also mandated at present
- SBWL approvals required for Projects in PA areas only in compliance to Wildlife (Protection) Act, 1972

Justifications:

- Projects in ESZ areas requires approval from SC-NBWL **only in Compliance to** Supreme Court's Order dtd 04.12.2006 against WP(C) 460/2004 and not under any Environmental Regulations
- Wildlife (Protection) Act, 1972 does not attracts for Projects in ESZ area like it attracts for Projects inside the PAs.
- In ESZ area- Except applicability of **section 3(2)(v)** of the Environment (Protection) Act 1986 and **Rule 5 (viii)** and **(x)** of the Environment (Protection) Rules, 1986 and EIA Notification, 2006, no other Environmental Regulations are applicable
- It takes 4-5 years in getting approval from SC-NBWL for projects in ESZ areas -Since SBWL meeting under Chairmanship of State Chief Minister happens generally once in a year in NER

Request For Reconsideration:

- Wildlife Clearance Application Forms for Projects in ESZ areas and Projects inside PAs have to be of Distinctive Types because of obvious reasons
- To Reinstate the Wildlife Clearance Procedures Introduced through Guidelines from IA Division dtd 20.08.2014 followed with subsequent Guidelines from Wildlife Division dtd 26.09.2014 with aim to facilitate the PPs for early Approval of Wildlife Clearance from SC-NBWL for Projects attracting EC in ESZ areas- This will be of great help for O&G E&P Projects, as presently it takes 4-5 years time in NER for getting Wildlife Clearance for projects executed with EC in ESZ areas

5) EC for both 'A' and 'B2' category Projects to be granted with number of wells with Block coordinates- Coordinates of wells not to be insisted

Previously EC with No of Wells and Block Coordinates were Granted- Which Of late converted to Well Coordinates

- **EIA study is done for the entire block as well as 10 Km radius from the block boundary-** Hence, Shifting of location/ change in Coordinates within the Block has no significancy so far the baseline data and Impact Analysis in EIA Report is concerned
- The locations mentioned at the time of applying TOR for grant of EC, **always tentative** , except for the cases where the location is opted in Forestland and FC is applied
- Coordinates in the Non-Forest land actually gets finalised **only after acquisition of land** and then only the Coordinates of the wells are finalised and CTO obtained prior to Drilling

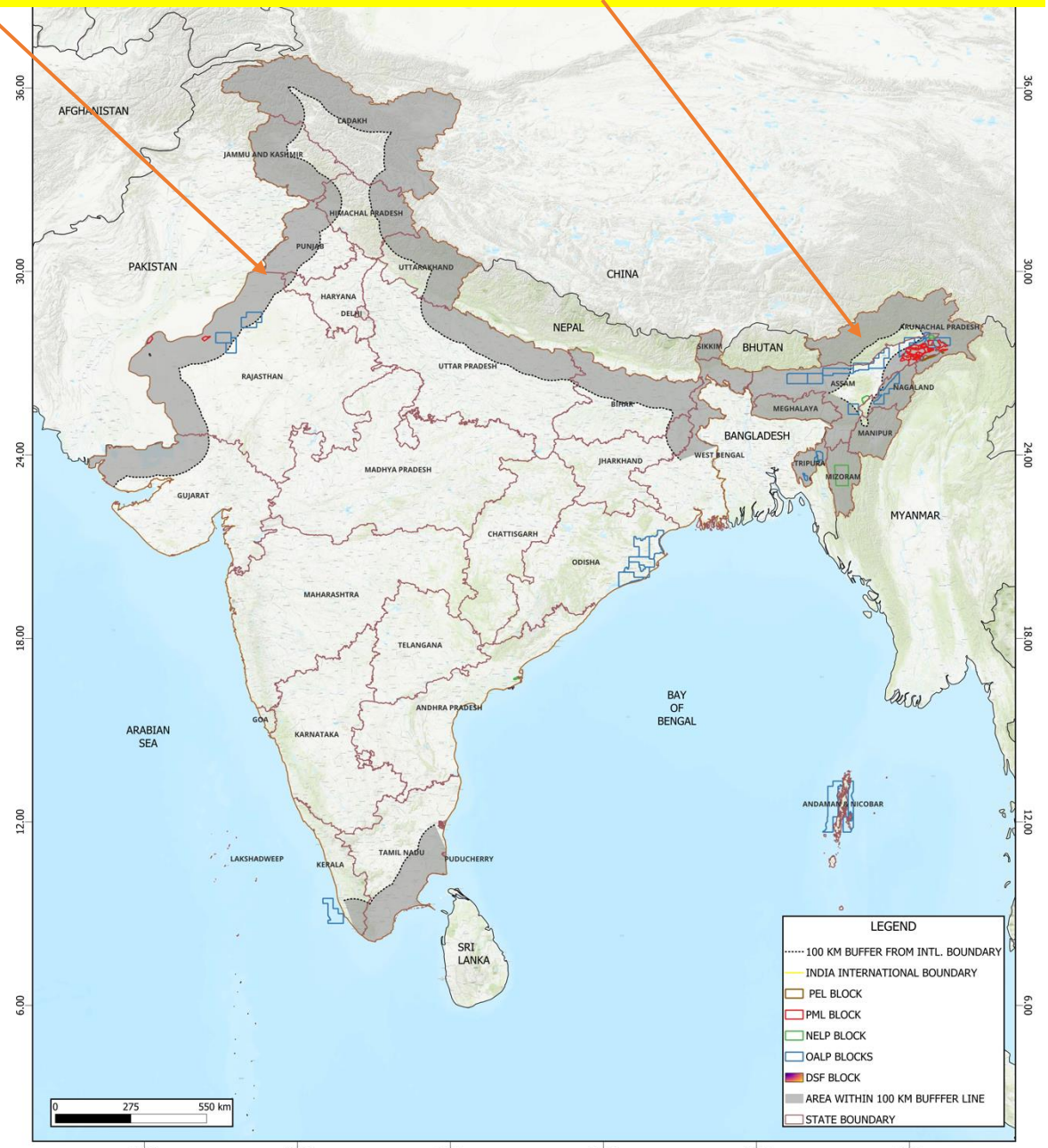
**6) Relaxation on Environment Clearance process for the O&G E&P Projects
Closed to International Borders and falling under the Territorial Jurisdiction of
BSF notified by Gol on 11.10.2021**

Requested for consideration as “Strategic Energy Project of National Importance”

**Gol vide notification dated 11.10.2021 rationalised the Territorial Jurisdiction of
BSF as follows by amending the BSF Act, 1968:**

- **50 Kms** along the International Borders in the State of Punjab, West Bengal , Assam, Rajasthan and Gujarat
- **Whole area in the States/UTs** of Manipur, Meghalaya, Mizoram, Nagaland, Tripura, Jammu & Kashmir and Ladakh

A distance up to 100 Km along international borders - Gol has exempted FC under Van (Sanrakshan Evam Samvardhan) Adhinuyam, 1980 for Project of National Importance /National Security & Strategic Linear Project



We Request

To consider O&G E&P Projects Closed to International Borders as “Strategic Energy Project of National Importance” and grant of Environment Clearance for such Projects may be treated either as “B2 Category” under purview of EIA Notification, 2006 or to be put under Category 1(e) of EIA, Notification, 2006

- **Oil Blocks in Rajasthan, Gujarat and NER & WB**- Closed to International Borders, are vulnerable to many Cross Border issues
- **Conducting Public Hearing (PH) with Videography of PH proceeding within the Territorial Jurisdiction of BSF is not permissible**
- **PH process also non conducive in Border Areas because of mixed population**
- **Chances of loosing Oil reserves in the Border areas are very high if secrecy is not maintained about the available reserves of Hydrocarbon in the Border States**

7) Lands notified as forests in records of the State Govt but practically at present there is no forest cover over ground due to change in Demographic patterns over last 3/4 decades- Need to be considered for De-Reservation

- Presently many such areas having no forest covers are inhabited with Villages, Agriculture Fields, Markets, Schools, Townships, Govt offices, Tea Gardens, Factories etc- But still these are considered as forestlands and calls for action against the Erring Officials of the State Govt under purview of the Indian Forest Act, 1927 for Encroachments
- **Such areas need to be De-reserved from the Forest Records of the respective State/UTs after due Physical Verifications on ground**
- **Pending which in many cases, even after grant of FC possessions couldn't be obtained**
- **Also in some cases many prospective hydrocarbon blocks had to be sacrificed when analysed in DSS of Dehradun**

8) O&G Pipelines laid prior to enactment of FCA, 1980 and Wildlife (Protection) Act, 1972

-Need to be exempted from Forest and Wildlife Clearance approval processes for Day-to-Day Repair /Maintenance/ Upgradation works

Pipeline of OIL laid in 1960s only qualifies for the same



ऑयल इंडिया
OIL INDIA

**OIL'S
PIPELINE**

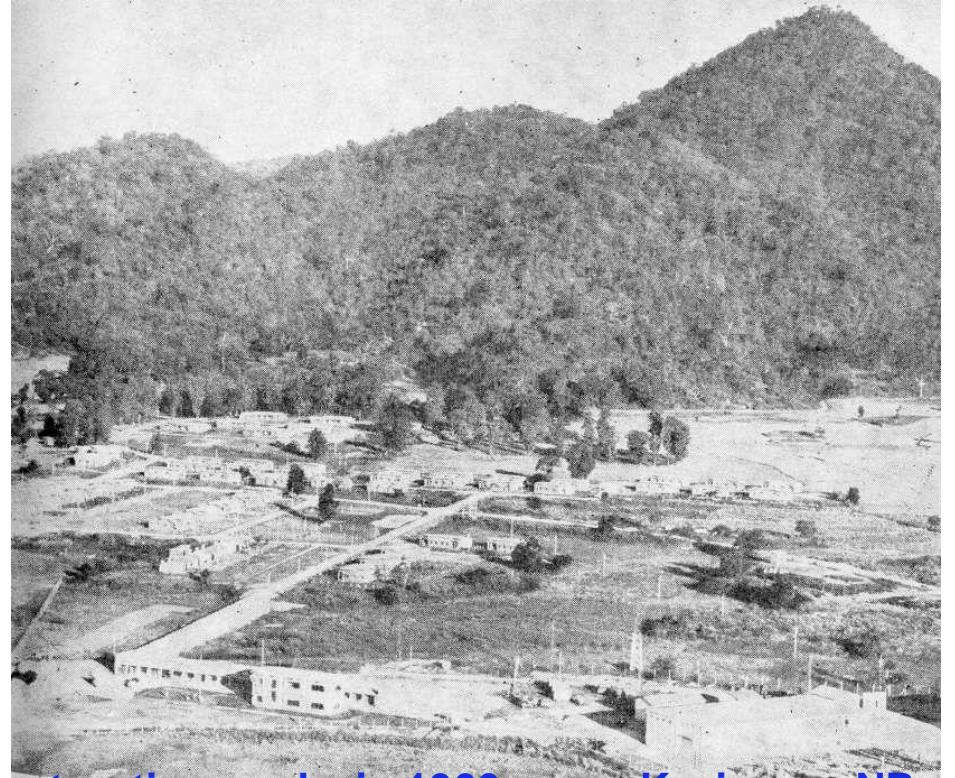
(Commissioned:
1962)

Total Length:
1,157 Km





Pipeline Construction through Forest Areas in 1960s



Construction works in 1960s near Kaziranga NP



Survey Works during Construction in 1960s



Construction works in 1960s

**Growth of any Vegetation and Tree like the
Surrounding Forests not allowed over ROW**

Motorable ROW Inside Forest



**Pipeline ROW of 1960s
in Forest During 20th Century (June, 2007)
while laying NSPL Pipeline**

10.06.2007 10:59

Request by OIL to Ministry for Inspection of Pipeline ROW before taking final Call on FC Exemption

- Pipeline FC Exemption Issue was discussed as Policy Item No (2) in FAC Meeting held on 07.11.2022 and certain issues related to OIL's Pipeline ROW of 1960s have been wrongly envisaged by the Committee, as reflected in the Minutes
- **Immediate after release of Minutes of FAC meeting dtd 07.11.2022, O/o CMD, OIL, vide letter dtd 29.11.2022 requested Ministry for a Site Visit of OIL's Pipeline ROW in forest areas in Assam and West Bengal before taking a final call on the matter.**

MoEF&CC Finally issued a guideline dtd 23.12.2022 based on decision in FAC meeting held on 07.11.2022 without permitting FC Exemption for Day to Repair/ Mani Activities in OIL's Pipeline ROW in Forest areas –However, Exemption in FC permitted for a maximum period of 3 months for tackling Emergency Situations in ROW inside forests

Considering the Legacy and Age of OIL's Pipeline, we Request Ministry to Consider followings:

- **Ministry may consider for a site visit of OIL's Pipeline ROW in forest lands of Assam and West Bengal to witness the ground reality that- The 18.2 mtr width ROW of 1960s is maintained clear till date without growth of any Vegetation or Trees etc inside the Forest areas as well as in revenue lands (such was also requested by OIL earlier on 29.11.2022 immediate after FAC meeting on 07.11.2022)**
- **To consider for amendment of OM dtd 23.12.2022 by permitting Day-to-Day Repair/ Maintenance/ Upgradation works inside the Forests without attracting FC – As it is need of the hours to take care for health of the Pipeline which is operating 24x7 basis for more than last 6 decades against its designated life span of 35 years – Such Day to Day Repair/ Maint is very much essential for Safety of the Pipeline as well as Safety of Wildlife Habitats and Biodiversity in and around the Pipeline ROW inside Forest Areas**
- **Wildlife Clearance Exemption may be considered under purview of W(P) Act, 1972 for Day-to-Day Repair/Maintenance/Upgradation works of the Pipeline inside the PAs in Assam and West Bengal**
- **For Tackling the Emergency Situations like Pipeline Leak/ Burst/Fire inside the PAs- Some provisional arrangement may be put in place with immediate effect to facilitate the Maint Team in restoring the Pipeline to its normalcy in ROW inside the 5 PAs in Assam and West Bengal , without attracting Wildlife Clearance under WL(P) Act, 1972 during Emergency Situations**

9) Oil & Gas E&P activities are not to be ‘Prohibited’ in final site specific ESZ notifications (Published or To be published) - It should be permitted as ‘Regulated’ activity by forming a ‘ Monitoring Committee’

Except applicability of Environment (Protection) Act 1986 [section 3(2)(v)] and Environment (Protection) Rules, 1986 [Rule 5 (viii) and (x)] and EIA Notification, 2006- No other Environmental Regulations are applicable in ESZ Areas- Hence O&G E&P Activities are not to be Prohibited – Else the Nation will lose lot of Hydrocarbon Reserves from NER where Forest cover is 64.2 %

10) O&G E&P Activities Do not cause any Land Subsidence Affects- Subsidence Study condition not to be stipulated in all EC orders

- Land Subsidence study by OIL in July, 2019 in its 135 years old Digboi Oil Field and other Oil fields in Upper Assam and Arunachal Pradesh revealed that- Oil & Gas E&P Activities doesn't cause any Land Subsidence Effect - **The study was done through National Remote Sensing Centre (NRSC) of Indian Space Research Organisation (ISRO) Hyderabad**
- Subsidence study by OIL in November, 2024 thr'o NRSC,ISRO Hyderabad in Rajasthan Fields also reveals- No Subsidence
- **Report of the Sub-Committee constituted by the MoEF&CC also states that O&G E&P activities doesn't cause any land subsidence affect** – Study by the Ministry in KG Basin fields in pursuance to the Direction of Hon'ble High Court of Andhra Pradesh at Hyderabad dated 29th June, 2009 against Writ Petition No. 13341/08 filed by Krishna Godavari Deltala Parirakshana Samithi, Bhimavaram, West Godavari District in Andhra Pradesh
- **The kingdom of Saudi Arabia, world's largest continuous Oil Producers in the sand desert, has never experienced any Land Subsidence affects in the sand desert till date-** Saudi Arabia, is producing Oil since March, 1938 and till date it produces 13.24% of the oil consumed in the entire world daily and have reserves for coming 221 years
- Many Zonal Subsidence Study report available in the Public Domain/ others may be taken as a base reference instead of stipulating such conditions against each EC orders
- **Such has significancy in areas having Limestone (Calcium Carbonate CaCO₃) sedimentary rocks and not in all cases**

July, 2019

Land
Subsidence
study

Done by OIL

Through
**National
Remote
Sensing
Centre**

(NRSC) of
Indian Space
Research
Organisation
(ISRO)

Hyderabad

Arunachal Pradesh

Oil & Gas E&P Activities doesn't cause any Land Subsidence Effect

Study by :NRSC-ISRO in July,2019 for OIL's Upper Assam and Arunachal Pradesh Fields



11) Followings not to be incorporated in all EC orders for Temporary Activities at Drilling Sites (Such can be stipulated for Permanent Production Installations)

- **Installation of Infra-red camera at Drilling Sites-** Monitoring of fugitive emission of Methane
- **Trapping/ Storing of CO₂ at Drilling Sites**
- **Zero Liquid Discharge at Drilling sites**
- **Making of Pucca Approach Road to Drilling sites to minimize generation of suspended dust** - Exploratory drilling activities are purely of temporary nature for a very short duration
- **Mobile ETP coupled with RO for Drilling Locations**

***It is not possible to comply these in Drilling locations and as a result leads to non compliance while obtaining CCR**

12) Green Belt development in 33% of the total Block area should be applicable for Permanent Production Installations only and not for following Cases:

- i) **Offshore Exploratory Drilling Activities within 12 Nauticla Miles** – While granting **B2 category EC** for Offshore Exploratory drilling, it has been stipulated for **development of green belt in Onshore area over 33% of the Offshore total block area (Andhra Pradesh)**
- ii) **When the entire project is executed in Forest land**
- iii) **Onshore Exploratory Drilling Locations (Temporary activities)**

13) Clarification on EC Validity for O&G E&P Projects Vice-versa CTO

Grants by PCB/PCCs- An OM may be issued by MoEF&CC

EC Validity Defined in EIA Notification, 2006: [SO 2944(E) dtd 14.09.2016]

“ The “**Validity of Environmental Clearance**” is meant the Period from which a Prior Environmental Clearance is Granted by the Regulatory Authority,to the “**Start of Production Operations by the Project or Activity**”,to which the application for prior Environmental Clearance refers”

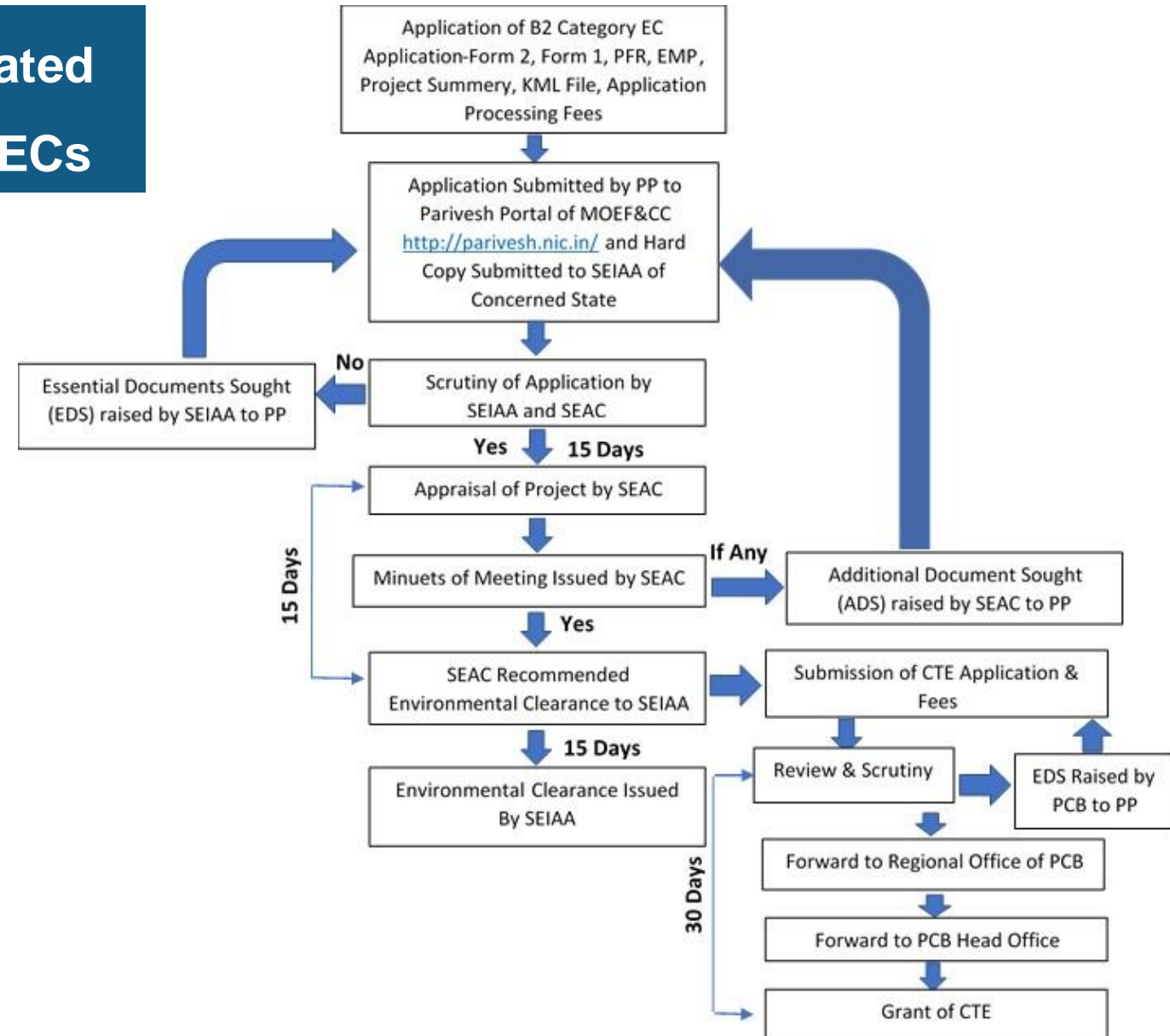
- An O&G E&P Project granted EC for 300 wells and some of the wells are drilled and Put under Production within the validity period of EC
- In a sequential manner the remaining wells out of 300 wells are drilled during validity period of the PML and subsequently put into Production
- State PCBs denies to grant CTOs for the wells drilled after 10 years presuming that EC already Expired after 10 years as per validity timeline of 10 years for O&G E&P Project

EC validity period doesn't arise for such cases as “Start of Production Operation” has already been met within the 10 years validity period of EC – A Clarification OM may be issued by the Ministry in this respect

14) An uniform SOP need to be formulated for grant of B2 Category Exploratory ECs

As the present evaluation/ approval process varies from State to State-

- A SOP developed in Assam wef January, 2021 for granting B2 Category EC within 45 days may be referred for that purposes for adopting in other State/UTs



15) EC Validity for O&G E&P Projects to be made Coterminous with the validity period of PML – At present validity of EC for is only 10 years with provision of extension by max one year, whereas PMLs are normally granted for 20 Years

16) Validity of Certified Compliance Report (CCR) to be increased from 1 year to 3 years for Expansion Projects) in line with the validity of EIA Report and Public Hearing proceeding are made 3 yrs validity vide OM dtd 08.06.2022

17) Whether NPV @ 2% still payable while granting O&G PMLs involving Forest land as per OM dtd 24.06.2015 after abolishing FC approval from Central Govt under section 2(1) (iii) of Van (Sanrakshan Evam Samvardhan) Adhinyam, 1980

If 2% NPV is payable- A mechanism to be developed for On-line collection of payable 2% NPV prior to grant of PML by the respective State Govts- **Since on-line FC application is no more available under present scenario to make such payments on-line prior to PML grant**

18) Request for a “Standard Check List” for raising EDS Queries against FC proposals –

- **Repeated EDS/ADSs are raised, even when there is a standing instruction vide DO letter dtd 22nd December, 2021 from O/o DG & SS, MoEF&CC to all State and UTs and all ROs of MoEF&CC, that, EDS queries can be raised once only against any FC proposal**

- **Such can be prepared by compiling the EDS/ADS queries readily available in PARIVESH portal against various FC Proposals**
- **It will help to avoid delay in getting the Stage-I Forest Clearances**

19) Non-availability of land banks for CA purposes in NER and difficulty in getting mandatory Certificate from the competent authority of the State/UT, certifying that no Non-Forest Land available in the entire State/UT for allotment towards CA purpose- MoEF&CC OMs dtd 22.05.2019 & 07.11.2022 permits to arrange CA land from other State/UTs having forest covers 20 % or less of its total geographical area in case the project execution State/UT is having forest density more than 33 % of its total geographical area

Suggestions:

- **“Green Credit Scheme” if enrolled by PPs, may be allowed to exchange for the CA purposes**
- **CA Land Allotment from ‘*Sustainable Land Management Program*’ / “*Forest & Tree Cover (FTC) Program*” planned till 2030 - **26 million ha degraded land** to be retrieved for creating an additional carbon sink of 2.5 - 3.0 billion tons by 2030 -**Declared by Hon’ble Prime Minister in CMS-COP13 conference, held at Gujarat in February, 2019****
- **Creation of Encroachment free land bank for CA purposes by the State/UT Govts with “Non-Inviolable status in DSS**
- **“Green Credit Scheme” in PPP model - To promote for generating pool of readymade CA land with pre-approval from State Forest Dept**

20) Wildlife Management Plan not to be insisted while considering 'A' category EC proposals by EAC at Central Level-

- As preparation of Wildlife Management Plan is the responsibility of the State/UT Govts and UAs only have to deposit 2% of the total Project Cost in 'CAMPA' fund towards the said account (OM 08.06.2022)

21) In Assam ,CTE is not granted till EC is accorded for the Project-

- Consent to Operate (CTO) is granted only after obtaining EC and Consent to Establish (CTE) need to be granted for initial Preparatory works - **A Clarification OM from MoEF&CC required in this respect**

22) May be considered for abolishing submission of 6 monthly EC Compliance Report for Projects declared Financial Closures and the Project is put into Operational services –

- Submission of 6 monthly EC Compliances reports is mandatory for decades old projects
- **Units put into Operational services are monitored with grant of CTOs by State PCBs /UT PCCs and Annual Environment Returns** submitted against such Operational units- Hence may be reviewed

23) CTE need to be Exempted for the Projects having EC /applied for EC- CPCB already issued guidelines in this respect on 02.02.2017 and 02.11.2018

24) Preparation of Digitised Map for Forest and Wildlife areas in NER

25) Not to prescribe CER compliance condition in EC order by allocating certain % of Capital Investment in reference to OM dtd 01.05.2018 as the said OM revoked vide OM dtd 30.09.2020

Mandates vide MoEF&CC's guideline dtd 1st May, 2018

Spending 2 % to 0.25 % of Capital Investment as CER around the Project area for Green and Brownfield projects based on the issues raised during the Public Hearing, Social need Assessment in EIA Report , Environment Management Plan, Resettlement and Rehabilitation Plan, etc- **As it is not possible to spend stipulated huge amount for high valued Project within 3 yrs resulting to Non-Compliances during CCR**

SI No	Capital Investment / Additional Capital Investment (in Rs)	Greenfield Project (% of Capital Investment)	Brownfield Project (% of Additional Capital Investment)
1	< 100 crores	2.0 %	1.0%
2	>100 crores to < 500 crores	1.5 %	0.75 %
3	>500 crores to < 1,000 crores	1.0 %	0.5 %
4	> From 1000 crores to < 10, 000 crores	0.5 %	0.25 %
5	>10,000 crores	0.25 %	0.125 %

MoEF&CC vide OM dtd 30.09.2020 revoked CER fund allocation and in lieu directed to comply the issues raised during Public Hearing and commitments made by PPs in EMP (subsequent clarification OMs dtd 20.10.2020 and 25.02.2021)



1) OIL is not getting possession of 7.111 ha Forest lands for Locations KUP & KUL in Ningru PML under Diyun Circle of Changlang district in Arunachal Pradesh

- Final FC granted on 25th February, 2021 against Stage-I FC granted on 13th October, 2020
- OIL Plans to drill 10 wells from these Well Plinths for which EC already granted on 7th January, 2020



Boundary Pillar demarcation could be done on 24.06.2024 by the Forest Dept – But Eviction couldn't be done due to agitation by the local people

2) Regularization of FC Violation Case in Kharsang PML of GeoEnpro Petroleum Ltd in Arunachal Pradesh

Awaited since 2019 even after settlement of Rs 12.57 cr as Panel CA and Panel NPV

- **FC grant on 27.09.2017 under 2(iii) of FCA, 1980 for PML Grant –Pointed out Violation of FCA, 1980 in connection with 30 wells involving 31.79 Ha forest lands**
- **Rs 12.57 cr already deposited in 2018 as Panel CA (Rs 2.36 cr) , Panel NPV (Rs 10.21 cr) and 5 times lease transfer charges of Rs 5 Lakh**
- **FC Application for regularisation of Violation case submitted on 24th April, 2019 (FP/AR/MIN/ 39891/2019 dtd 24.04.2019)**

Regularization of FC Violation Case in Kharsang PML

- **Committee formed by GoAP on 24.03.2022** -To reply SO, MoEF&CC, Guwahati's query vide letter dtd **10.12.2021**
- Committee's Report was forwarded to SO, Guwahati vide PCCF & HoFF's letter dtd **28.04.2023**
- **IRO, Guwahati further advised State Govt vide letter dtd 14.06.2023 to submit Action Taken report against the erring officials under provision of Indian Forest Act, 1927**
- **Chief Secretary, GoAP vide letter dtd 12.04.2023 requested Secretary, MoEF&CC, for regularisation of the FC proposal at the earliest awaited since 2019**
- **O/o PCCF(C) & HoFF, GoAP vide letter dtd. 20.09.2024 requested DGF & SS, MoEF&CC- To modify the condition-(v) stipulated in Central Govt's FC approval letter dtd 27.09.2017 in regard taking action against the erring officials associated with execution of the Kharsang PML deed more than Three decades back in 1997 with effectivity of the PML from 1995 w'out obtaining FC under 2(iii) from Central Govt - Request has been made to eliminate the said condition as a pre-requisite for grant of FC approval under section.2(ii) and allow operationalization of the field, in larger national interest**



**We Request Additional Secretary, MoEF&CC and
all other Concerned MoEF&CC Officials Present here Today-
To consider the Environmental Clearance related issues
highlighted in this presentation
for EODB in Oil & Gas sector in NER**

For any Assistance/ Consultations– May be contacted in Mob: 8800770778 and e-mail: joydev@sfc.asia

