


NON-COMPLIANCES OF EC CONDITIONS OBSERVED BY RO, SHILLONG FOR EXPLORATORY DRILLING



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I. Abandonment and Restoration Issues:

- Non-implementation of a full abandonment plan to restore the abandoned wells.
- Dry wells have not been properly restored with concrete and brick debris left behind, drilling mud left on the ground, waste pits not reclaimed and no plantation conducted.
- A restoration plan and completion schedule for abandoned wells has not been submitted.





II. Environmental Monitoring Deficiencies:

- No monitoring data for RSPM, SPM, SO₂, NO_x, HC & VOC from DG sets have been submitted.
- Ambient noise level monitoring data has not been submitted.
- No monitoring of gaseous emissions during flaring has been conducted.
- Monitoring data for hazardous waste collection, treatment, storage and disposal not submitted.

III. Regulatory Compliance Issues:

- Site preparation has started without obtaining Consent to Establish from State Pollution Control Board. Spudding of wells has started before issuance of Consent to Operate from SPCB. Copies of CTE and CTO, when obtained from the SPCB, have not been submitted.
- Environmental clearance has not been revalidated before proceeding with drilling for wells which could not be drilled within validity of EC.
- ONGC has started oil & gas extraction at certain wells without obtaining fresh clearance.
- Submission of six monthly compliance report is irregular.



IV. Environmental Management **Deficiencies during operation:**

- Waste pits are not properly/extensively lined with HDPE lining, wastewater in pit found full to the brim on the verge of over spilling to adjacent land.
- Proper drainage channel has not been provided through which the sludge can flow down to the HDPE lined waste pits; allowed to haphazardly flow down the slope into waste pits.



V. Environmental Management and Reporting Gaps:

- Dedicated Environment Management Cell with full-fledged laboratory facilities has not been set up. Equipment for ambient air quality monitoring and specialized analysis is outsourced to an expert agency rather than being in-house.
- Details of funds allocated for implementing environmental conditions could not be provided.
- Financial closure and commencement of land development work have not been reported.



VI. Operational and Safety Concerns:

- The Company, at times, does not provide proper safety equipment such as shoes, helmets, and safety glasses during site visits.



THANK YOU

OIL REFINERY

1. Waste Management & Disposal:

- i. The sludge lagoon filled with oily sludge, requires immediate disposal.
- ii. Disposal reports for catalyst waste and alumina balls not submitted.

2. Environmental & Wildlife Protection:

- i. Non-preparation of contingency plan to mitigate the impact on the Golden Langur habitat and nearby villages.



3. Emission Monitoring & Air Quality Compliance:

- i. Monitoring of hydrocarbon (HC) emissions has not been conducted as stipulated.
- ii. The refinery has not submitted emission data for HC, Benzene, and VOCs along with its six-monthly compliance reports.

4. Leak Detection & Repair (LDAR) Compliance:

- i. The Company has failed to submit the LDAR monitoring report every six months, as required.

5. Reporting & Documentation Delays:

- i. The refinery has consistently delayed the submission of its six-monthly compliance reports
- ii. The financial closure and final project approvals have not been communicated to the Regional Office, Shillong.