

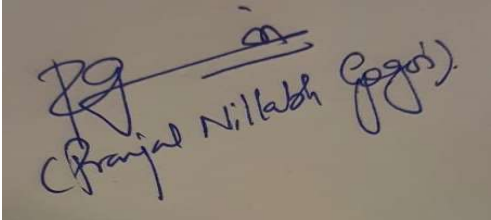
Format for submission of views on the Expression of Interest for

Duliajan to Chandrapur near Guwahati via Jorhat, Golaghat, Karbi Anglong and Nagaon Pipeline>

Views in respect of the Expression of Interest		<Indicate reference of the EOI>
1	Name of the entity / person	PRANJAL NILLABH GOGOI
2	Complete address	Kundil Nagar, Kalitakuchi, Po – Udayan Vihar, Guwahati, Assam - 781171
3	E-mail ID/ telephone / fax	pranjalng@gmail.com
4	Identification proof (in case of an individual person)	EPIC – DZN6134787
5	Views and suggestions related to:	Against the EoI hosted in PNGRB website dtd 18.07.2023
a)	Natural Gas Pipeline proposed by the entity for laying, building, operating or expanding Natural Gas Pipeline	From Duliajan to Chandrapur near Guwahati via Jorhat, Golaghat, Karbi Anglong and Nagaon
b)	Other aspects of the proposal	Duplicity of Pipeline Infrastructure vis-à-vis Northeastern Gas Grid of IGGL.
c)	Any other issue	Adopting a holistic approach towards development of a bigger size robust Pipeline Grid to connect the Gas fields of Upper Assam for monetization of Gas from Discovered Small Fields present in the Southern bank of Brahmaputra including existing fields of OIL, ONGC and other Private E&P players operating in Upper Assam Region.

Date: 18.08.2023

Place: Mumbai



Pranjal Nillabh Gogoi

To
The Secretary,
PNGRB

Date: 17.08.2023

Sub: Views and suggestions i.r.o Public Notice hosted on 18.07.2023 against the EoI submitted by DNP Ltd in the proposed Duliajan to Chandrapur Pipeline via Jorhat, Golaghat, Karbi Anglong, Diphu and Nagaon.

Respected Sir

Undersigned Individual would like to make this humble submission:

It is an accepted fact that extension of Duliajan-Numaligarh Pipeline upto Bongaigaon via Guwahati was conceptualized in the Hydrocarbon Vision Document for North East 2030, published on 09th Feb, 2016. The vision also stated for the creation of a Natural gas Pipeline Grid in North-East in three phases which would ultimately get connected to the National Gas Grid. The details of different Natural Gas Pipelines as envisaged in the documents are as under:

1. Phase – I: Duliajan – Guwahati – Bongaigaon
2. Phase-II: Bongaigaon – Guwahati – Silchar- Agartala
3. Phase – III: Bongaigaon – Siliguri – Barauni.

Subsequently, against the EoI submitted by Assam Gas Company Limited (AGCL), PNGRB had then hosted a Public Notice dtd 24.05.2017 inviting for comments for laying of a Pipeline from Barauni to Guwahati alongwith spurlines connection all the north eastern states of Arunachal Pradesh, Nagaland, Manipur, Meghalaya and Tripura. Comments were received and thereafter 722 KM Barauni to Guwahati Natural Gas Pipeline as an extension and integral part of Jagdishpur-Haldia-Bokaro-Dhamra Pipeline (JHBDPL) has been authorized under Regulation 17 of the PNGRB Act in 03.02.2018.

Also, under section 42 of the PNGRB Act 2006, the authorization has been granted to M/s Indradhanush Gas on 14.09.2018 for laying, building, operating or expanding North East Natural Gas Pipeline Grid in pursuance of the Policy Directives issued to PNGRB by Ministry of Petroleum and Natural Gas (MoPNG). This grid is 1656 KM pipeline network, which along with GAIL's Barauni-Guwahati Pipeline completes the availability of a robust Natural Gas Transportation network in North East that will fulfil the larger Public Interest by supplying gas to CGD demand centers, connecting Gas Fields etc.

Further the GAIL & IGGL's network has also ensured the availability of Pipeline infrastructure along the Northern and Southern bank of Brahmaputra in Assam by

completing laying of Pipeline across Brahmaputra twice i.e. Lakhimpur to Jorhat by IGGL and Darrang to Kamrup (Metro) by GAIL.

This is going to facilitate the two entities to ensure expansion of their P/L network to the domestic source fields as well as upcoming CGD demand centers along the North and South Bank of Brahmaputra in the state of Assam i.e. IGGL network can be expanded along the south bank from Jorhat, Sibsagar, Dibrugarh, Tinisukia thereby connecting the Discovered Small Fields auctioned by DGH in DSF rounds- I, II and III. Namely, the DSFs of Laxmijan, Bihubar, Borsila, Charaideo, Dipling, Sarojini, Sapekhati, Duarmara, Jeraipathar, Kherem, Disaijan, Hazarigaon, Madhakali, Haldibari, Umatura, Tiphuk etc. can be monetized.

Further, expansion of IGGL network in Upper Assam to the districts and towns of Jorhat, Golaghat, Sibsagar, Charaideo, Dirok, Margherita, Nahorkatia, Namrup will facilitate E&P companies namely Amguri gas fields operated by Oilmax, Hazarigaon gas fields of Vedanta, Dirok, Kharsang and Kherem DSFs of HOEC to enhance the development of their gas fields which till now has been unable to monetize the same due to non-availability of a diverse network and limitation of the capacities of the Pipeline. Extension of IGGL's network will also facilitate ONGCL's Jorhat and Assam Asset as well as OIL's fields in Duliajan to operate their non-associated gas fields.

The proposal of DNP Ltd to lay a Pipeline from Duliajan to Chandrapur via Jorhat, Golaghat, Karbi-Anglong, Diphu, Morigaon and Nagaon has been reviewed in phases.

1. From Dispatch Terminal, Duliajan to Bengenakhowa (IP-2) via Bhutiapar (IP-1): 200 KM: This new 16" pipeline follows the same route of the existing 16" Duliajan-Numaligarh dedicated pipeline. The proposal to consider this P/L as a common carrier from Dedicated P/L has been kept in abeyance due to objections received from various organisations and entities.
2. From Bengenakhowa (IP-02) to Chandrapur RT near Guwahati – 300 KM: This section of the Pipeline however, serves as a duplicate to the IGGL's Guwahati-Numaligarh Pipeline along with the Dergaon-Dimapur Pipeline. This proposal is not only duplicating an already laid IGGL network but it also would render the investment of Public money through grant of VGF to IGGL for constructing the pipeline of IGGL as waste.

The estimated domestic gas availability of around 5.5 MMSCMD is promising as it will definitely boost to the development of the NE Region. However, authorising to the extension of the IGGL's NEGG i.e. extension of the 24" IGGL's Guwahati-Numaligarh Pipeline upto Dirok, Kherem, Kharsang via Jorhat, Amguri, Sibsagar, Charaideo, Namrup and Duliajan will not only ensure enhancement of domestic gas production from existing gas fields, it will also encourage the E&P owners of DSF to undertake field development activities for production of domestic gas from the DSFs. IGGL has the benefit of a vast pipeline which is nearing completion and is also getting connected to the

National Gas Grid through GAIL's Barauni-Guwahati Pipeline. it would also ensure overcoming the gas flaring issue faced in the region and this will also ensure optimization of uniform production of gas and fulfilling customer's demand. It is noteworthy, that DNP has also suggested for injecting this 5.5 MMSCMD volume into IGGL network at Jorhat. DNP Ltd has also mentioned this option in their EOI. However, as 16" DNPL line is not a common carrier, therefore it has submitted this proposal to lay a new line from Madhuban in Duliajan to Jorhat.

The area wise demand submitted in Annexure-IV seems very inflated. The anchor loads considered for Karbi-Anglong, Bokajan, Nagaon are not realizable. Apart from the declared Geographical Areas by the different CGDs in these regions, there is not an existing anchor load that will draw gas at a rate of 0.1 MMSCMD and above, on uniform basis. Ultimately, due to non-availability of anchor loads, the gas that is proposed to be transported through DNP's 16" 500 KM pipeline will ultimately have to be injected into IGGL's network for onward transmission to the National Gas Grid. Further, constructing the Pipeline from Duliajan to Chandrapur will also take time.

Previously, along the above proposed route Assam Gas Company limited has PNGRB's authorisation of it's 107 KM Pipeline Network with a system capacity of 0.6 MMSCMD only. However, the different pipelines of AGCL under this authorisation are point to point customer pipelines, mainly to BVFCL. Moreover, this pipeline has not been able to mitigate the flaring issue due to the limited capacity and non-connectivity to the National Gas Grid.

The Vision Document envisaged on availability of a Natural Gas Pipeline Grid across the North Eastern States and to maximize the monetization of domestic Natural gas production as well as fulfilling the demand supply requirements of Anchor Load customers in the Upper Assam Region.

This requirement has already been fulfilled by IGGL by construction the NEGG. Further, extension of it's 24 inch Pipeline from Jorhat to Duliajan and beyond as stated in above para, as well as spur lines from Kamrup (M) District to Nagaon via Jagiroad from IGGL's Guwahati-Silchar Pipeline can meet the requirements as stated by DNP in it's EOI.

Any authorization to DNP for laying it's 500 KM Duliajan to Chandrapur Pipeline will be a waste of Public Money that has been invested by Government by granting VGF for development of the North Eastern Gas Grid, that is being implemented by IGGL. Hence considering the larger public interest, it would be in the interest of the Government to allow IGGL to expand it's 24 inch GNPL from Jorhat to Duliajan, as aforesaid, instead of considering DNP's proposal of the 500 KM pipeline which will serve as a duplicate pipeline to IGGL's P/L. Further, if authorized this will also affect the financials of both the entities.

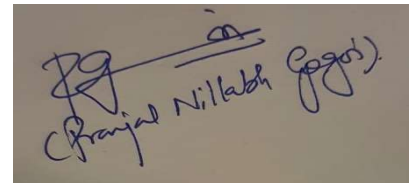
DNP Ltd is a JV of AGCL, NRL and OIL. IGGL is a JV of ONGC, IOCL, GAIL, OIL & NRL. With all CPSE Promoters under the administrative control of MoPNG, it would be more appropriate if IGGL continues with expanding and developing the Natural Gas Pipeline Infrastructure through NEGG Project. Whereas the other entities proceed with a focus of penetrating more into CGD development. It is worthwhile to mention that there are less than 20 CNG stations in entire North East even though the one of the oldest CGD entity operates in Upper Assam since 1967.

Hence, instead of investing in duplicating Pipeline infrastructure, IGGL may be allowed to expand the NEGG across North Eastern Region, while other CPSEs and State PSUs may put more efforts in expanding and developing the CGD in North East Region.

I will be grateful to your kind consideration on the above stated.

Yours Truly

Place: Mumbai

A handwritten signature in blue ink on a light-colored background. The signature is written in a cursive style and includes the name "Pranjal Nilabhi" followed by a circled "G" in parentheses. There is a horizontal line above the signature.