PL/PJ/Gas/PNGBR/12

Date: 5.12.2018

To,

The Secretary,
Petroleum & Natural Gas Regulatory Board,
First Floor, World Trade Centre,
Babar Road,
New Delhi – 110 001

Subject: Expression of Interest to Lay, Build & Operate Natural Gas Pipeline from Mumbai to Angul

Madam,

This has reference to the public notice no- Infra/NGPL/145/MAPL/01/18 dated 6.11.2018 seeking views from any entity for Laying, Building & Operating Natural Gas Pipeline from Mumbai to Angul.

In this regard, views/comments of IOCL are attached herewith as Annexure-I.

Thanking you,

Yours Sincerely,

S K Jha
Chief General Manager (PJ-Gas)
### Format for submission of views on the Expression of Interest for

**Mumbai Angul Pipeline**

<table>
<thead>
<tr>
<th>Views in respect of the Expression of Interest</th>
<th>PN No- Infra/NGPL/145/MAPl/01/18 dated 06.11.2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Name of the entity / person</td>
<td>Indian Oil Corporation Limited</td>
</tr>
<tr>
<td>2 Complete address</td>
<td>Pipelines Division Head Office, IndianOil Bhawan, A-1, Udyog Marg, Sector-1, Noida -201301</td>
</tr>
<tr>
<td>3 E-mail ID/ telephone / fax</td>
<td><a href="mailto:jhawk2@indianoil.in">jhawk2@indianoil.in</a> 0120-2448701</td>
</tr>
<tr>
<td>4 Identification proof (in case of an individual person)</td>
<td>N/A</td>
</tr>
<tr>
<td>5 Views and suggestions related to:</td>
<td></td>
</tr>
</tbody>
</table>
| a) Natural Gas Pipelines proposed by the entity for laying, building, operating or expanding Natural Gas Pipeline. | It is mentioned that proposed natural gas pipeline may follow the route of Mumbai-Nagpur Super Communication Expressway till Nagpur. It is submitted that there would be many disadvantages in laying the pipeline along the proposed highway, as enumerated below:  
  - Length of the pipeline would significantly increase by aligning with the Expressway in comparison to independent RoW. This would have additional cost implications and which would be factored in the tariff.  
  - Rental payment for ROU payable to expressway developer is expected to be significantly higher than one time ROU acquisition cost  
  - Bigger plots would be required for accommodating SV, IP, compressor stations etc. Such plots would have to be purchased outside the highway corridor at a suitable distance. So frequent detouring of the pipeline would be required and will have significant impact on CAPEX. Change in pipeline route away from expressway also would be necessitated in tunnels wherein laying of NG pipeline is not permitted.  
  - Additional spur lines would be required to be laid for last mile customer connectivity as industries would be far away from the highway.  
  - There is no anchor customer readily available in the route |
b) Other aspects of the proposal

Proposed MAPL would be connected to GAIL’s DUPL at Mumbai at one end and GAIL’s JHBDPL at Angul at other end. As there is no direct connectivity to any LNG terminal, additional tariffs of these pipelines connecting to LNG sources would also be levied and customers would need to bear additional tariffs. Hence, it is suggested that the instead of Angul, the pipeline may be extended to connect Dhamra LNG terminal. This will also generate additional demand from Kendujhar, Mayurbhanj, Baleswar, Jaipur and Bhadrak districts for the pipeline.

c) Any other issue

All customers in Akola and Amravati can be fed through CGD and there are no large customers. Hence, separate spur line to these cities as proposed may not be required. Instead, spur line of appx 170 kms may be considered to Bilaspur-Korba from Raipur for meeting anchor customer demand in these districts.

(*) To be separately submitted for each pipeline.

Date: 5.12.18

Place: Noida

[Signature]

Name and Signature of Entity/ Individual Person

Official Seal (in case of Entity)