7th December 2017

The Secretary
Petroleum and Natural Gas Regulatory Board
1st Floor, World Trade Centre,
Babar Road,
New Delhi 110001

Sub: Comments on the EOI received from M/s. Aardvark Developers LLP to Lay, Build and Operate or expand Petroleum and Petroleum Product (LPG) Pipeline from Paradip to Raxaul via Haldia, Durgapur, Patna Muzaffarpur, Motihari

Ref: PNGRB Public Notice No. INFRA/PPL/46/ADLLP/PDPRPL/01/17
dated 9/11/2017

Dear Sir,

This has reference to the PNGRB Public Notice dated 9/11/2017 on the EOI received from M/s. Aardvark Developers LLP to Lay, Build and Operate or expand Petroleum and Petroleum Product (LPG) Pipeline from Paradip to Raxaul via Haldia, Durgapur, Patna Muzaffarpur, Motihari.

We are enclosing herewith our comments on the above in the prescribed format for your perusal.

Thanking you,

Yours faithfully,
For Hindustan Aegis LPG Ltd.

(Rajiv Chohan)
President – Business Devt.

Encl: As above.

CARE CREDIT RATING 1

Installation: Plot No.72, Mahul Village, Post Box 8821, Trombay, Mumbai 400 074, India
Tel: + 91 22 2554 4832  Fax: + 91 22 2554 1969 / 2554 1105
Registered Office: 502, 5th Floor, Skylon, G.I.D.C., Char Rasta, Vapi 396 195, Dist. Valsad, Gujarat, India
Views on the Expression of Interest (EOI) received from M/s. Aardvark Developers LLP to Lay, Build and Operate or expand Petroleum and Petroleum Product (LPG) Pipeline from Paradip to Raxaul via Haldia, Durgapur, Patna Muzaffarpur, Motihari.

<table>
<thead>
<tr>
<th>Views in respect of the Expression of Interest</th>
<th>M/s. Aardvark Developers LLP’s EOI as mentioned above bearing no. ADLLP/BG/PNGRB/PHDPMRPL/001 dated 10/4/2017 (Public Notice no. INFRA/PPL/46/ADLLP/PDPRP/ 01/17)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Name of the entity/person</td>
<td>Hindustan Aegis LPG Ltd. (a part of Aegis Group of Companies)</td>
</tr>
<tr>
<td>2 Complete address</td>
<td>1202, Tower B, Peninsula Business Park, GK Marg, Lower Parel (West) Mumbai 400013</td>
</tr>
<tr>
<td>3 E-mail ID / telephone / fax</td>
<td>E-mail: <a href="mailto:rajiv.chohan@aegisindia.com">rajiv.chohan@aegisindia.com</a></td>
</tr>
<tr>
<td></td>
<td>Tel. no. 022 66663631 / 66663666</td>
</tr>
<tr>
<td></td>
<td>Fax No. 022 66663777</td>
</tr>
<tr>
<td>4 Identification proof (in case of an individual person)</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>5 Views and suggestions related to:</td>
<td></td>
</tr>
<tr>
<td>a) Petroleum and Petroleum product (LPG) pipeline proposed by the entity to lay, build, operate or expand from Paradip to Raxaul via Haldia, Durgapur, Patna, Muzaffapur, Motihari</td>
<td>Please refer Annexure I</td>
</tr>
<tr>
<td>b) Other aspects of the proposal</td>
<td>Please refer Annexure I</td>
</tr>
<tr>
<td>c) Any other issue</td>
<td></td>
</tr>
</tbody>
</table>

Date: 7/12/2017
Place: Mumbai

(Rajiv Chohan)
President – Business Devt.
Aegis Group of Companies
Mumbai
5 a) Views and Suggestions related to Petroleum and Petroleum product (LPG) pipeline proposed by the entity to lay, build, operate or expand from Paradip to Raxaul via Haldia, Durgpaur, Patna, Muzaffapur, Motihari:

1. It is a well-established fact that the overall LPG market is on a clear uptrend and is poised to post a healthy growth rate in the coming years as per Govt. of India forecast and estimates.

2. The LPG market growth is driven mainly by the increasing domestic consumer base, which forms part of around 90% of total LPG demand in India. The present consumption as per the 2015-16 figures released by MOPNG stands at around 19.6 Million MT per annum, a total growth of approximately 9% year-on-year, while the overall indigenous production capacity has remained stagnant.

3. India is already a net importer of more than 10 Million MT per annum and growing at a CAGR of 9% and all the future growth along with current demand supply gap has to be met through imports, which currently stands at 11 Million MT per annum and likely to double in the next 8 – 10 years.

4. Aegis Group has an operating experience of over 40 years in the Bulk Liquid Tank Terminalling business and has more than 2 decades of experience in the LPG Industry including building and operating Terminals. The details of Aegis Group can also be viewed at: www.aegisindia.com

5. Aegis is presently operating following LPG facilities in the country:
   - 21,000 MT cryogenic LPG terminal in Mumbai
   - 25,000 MT cryogenic LPG terminal in Haldia
   - 20,000 MT pressurized LPG storage facility in Pipavav

6. On LPG consumption front, India has been making rapid progress under Pradhan Mantri Ujjwala Yojana, LPG reaching economically weaker sections of the society, growing at CAGR of about 9% p.a. for last few years and in the process India becoming third largest LPG consumption market in the world. Our current LPG consumption is estimated to be about 22 MMTPA, while our LPG production is stagnant at around 11 MMTPA, thus leaving a huge gap of 11 MMTPA of LPG to be imported into the country. This import is naturally to be done through import terminals located at various places in the country.

The story of eastern region is even worse because eastern region has lowest penetration rate of LPG in the country. LPG industry has been unable to meet

Contd....2/-
the demand as there have not been adequate supply solutions available in the eastern region. It is in this backdrop that Aegis Group has decided to participate in the LPG infrastructure in the eastern region in order to ensure.

- Ensure availability of LPG
- Proper distribution of LPG, thus helping PSUs achieve the objectives under Pradhan Mantri Ujjwala Yojana
- Better availability of LPG and filling capacity thus enhancing the Government’s push for uplifting of the society at large
- It will help Oil Companies to reach LPG to the consumers at an efficient distribution cost along with all necessary HSE precautions.

7. Aegis Group through its company, M/s. Hindustan Aegis LPG Ltd. has gone ahead and designed, constructed and commissioned 25,000 MT Cryogenic LPG import terminal at Haldia with all the related allied infrastructure such as Jetty pipelines, Marine Loading Arms, Tank Lorry filling bays in Haldia. This terminal has already been commissioned and is operational as on date.

8. This 25,000 MT cryogenic LPG terminal at Haldia is already being used by BPCL to import their LPG parcels there, besides many other private players.

We already have a written down agreement with M/s. Hindustan Petroleum Corporation Ltd. that they will use this terminal for import of LPG in the eastern region for 1 Million MT per annum in the next 20 years.

9. The interconnection from the proposed pipeline to our LPG import facility at Haldia will provide OMCs with an additional mode of product evacuation from Haldia via pipeline, apart from the road, rail and coastal movement, which will not only ramp up the throughput capacity considerably, but also will be most preferred safe and economic mode of transporting LPG into the hinterland of Eastern India.

10. We have already made a representation to PNGRB vide our letter dated 24/1/2017 to include a connection to our LPG terminal at Haldia in a similar pipeline (a copy of the aforesaid letter is enclosed herewith).

11. The NOCs are already operating many bottling plants in the region and are also coming up with more bottling plants, which will have effectively, economical and safer bet from our Haldia import terminal. The said pipeline route in any case passes through Haldia.

Contd...3/-
In view of the above, (the ever growing demand and penetration of LPG in line with Govt. of India’s policy, lack of new indigenous production sources of LPG) and the demonstrated intent and interest of the OMCs to use our existing LPG import facilities at Haldia, it is imperative our LPG cryogenic LPG terminal at Haldia be provided an interconnection with the proposed the pipeline of Paradip – Haldia – Durgapur – Patna – Muzaffarpur – Motihari – Raxaul.

**Prayer:**

Keeping all the aforesaid in mind, we request that the proposed pipeline in question may please be ordered to be joined with our 25,000 MT cryogenic LPG terminal at Haldia in order to give substantial benefits not only to the national oil companies, but also to the people of the eastern region along with country at large.
The Secretary,
Petroleum and Natural Gas Regulatory Board
1st Floor, World Trade Centre,
Babar Road,
New Delhi 110001

Sub: IOC's Paradip – Haldia – Durgapur LPG Pipeline

Dear Sir,

First and foremost, we would like to introduce ourselves as a key all India player for LPG infrastructure and wish to point out that we have a large cryogenic LPG storage facility under construction at Haldia, which is likely to be commissioned in May 2017. Needless to mention that this project already has the necessary the approvals and permissions in place. The key highlights of this project are as follows:

- 12,500 MT Cryogenic Tanks x 2 Nos. = 25,000 MT of storage at Haldia.

- All three Oil Jetties at Haldia will be used for receipt of the product.

- These Oil Jetties can receive VLGCs (though after lighterage owing to local draft restrictions).

- We are also intending to construct a bottling plant at Haldia, which will be fed from the same terminal.

- We have a tie-up with HPCL, who have assured to use our LPG terminal at Haldia for bringing in their product to feed Eastern region.

We have seen and observed various documents w.r.t. the subject pipeline, which are in public domain including your website and are glad to note that our terminal at Haldia fits in nicely with the proposed pipeline.

We also observe that you have passed an order dated 31/8/2016 acknowledging that "IOC has already laid some part of the subject pipeline, wherein you have also asked them to follow the due process as stipulated in the Petroleum & Natural Gas Regulatory Board Act, 2006."
Keeping the aforesaid in mind and keeping the national interest in mind, we request you to please pass a suitable order for the Pipeline Project Proponent to include connection to our LPG terminal at Haldia in the scope, in line with the spirit of common user pipeline infrastructure.

We also understand that HPCL and BPCL have already written to you to block some capacity of this proposed pipeline for them, which further point out toward benefits of such a hook-up.

We look forward to your prompt suitable action, as requested above.

Thanking you,

Yours faithfully,
For Aegis Logistics Ltd.

(Rajiv Chohan)
President – Business Devt.
To,

The Secretary,
Petroleum and Natural Gas Regulatory Board,
1st Floor, World Trade Centre,
Babar Road, Barakhamba Lane,
New Delhi-110001

Sub: Comments on EOI of LPG pipeline from Paradip to Raxual via Haldia, Durgapur, Patna, Muzaffarpur, Motihari


Respected Madam,

Adani Dhamra LPG Terminal Pvt Ltd (ADLTPL) is building 3.6 MMTPA LPG import terminal at Dhamra Port. With reference to webhosting of subject EOI letter for LPG pipeline by PNGRB, we would like to submit our observations as enclosed in the prescribed format.

Thanking you,

Your sincerely,

Mukul Tewari
DGM- LPG
Views on the Expression of Interest to lay, build, operate and expand LPG pipeline from Paradip to Raxual via Haldia, Durgapur, Patna, Muzaffarpur, Motihari.

<table>
<thead>
<tr>
<th>Views in respect of the Expression of Interest</th>
<th>LPG pipeline from Paradip to Raxual via Haldia, Durgapur, Patna, Muzaffarpur, Motihari</th>
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</thead>
<tbody>
<tr>
<td>1. Name of entity/person</td>
<td>Adani Ports and Special Economic Zone Ltd (APSEZL)</td>
</tr>
<tr>
<td>2. Complete address</td>
<td>Adani House</td>
</tr>
<tr>
<td></td>
<td>Nr Mithakhali Six Roads, Navrangpura</td>
</tr>
<tr>
<td></td>
<td>Ahmedabad 380 009</td>
</tr>
<tr>
<td></td>
<td>Gujarat, India</td>
</tr>
<tr>
<td>3. E-mail ID/telephone/ fax</td>
<td><a href="mailto:mukul.tewari@adani.com">mukul.tewari@adani.com</a></td>
</tr>
<tr>
<td></td>
<td>Tel +91 79 2656 5555</td>
</tr>
<tr>
<td></td>
<td>Fax +91 79 2555 5500</td>
</tr>
<tr>
<td>4. Identification proof</td>
<td>NA</td>
</tr>
<tr>
<td>(In case of an individual person)</td>
<td></td>
</tr>
<tr>
<td>5. Views and suggestions related to:</td>
<td></td>
</tr>
<tr>
<td>a. Petroleum Products Pipeline proposed by</td>
<td>1. ADLLP to consider Dhamra LPG terminal as one of its major source point and extend the</td>
</tr>
<tr>
<td>the entity for laying, building, operating,</td>
<td>proposed pipeline to connect to Dhamra LPG Terminal and to be rename the LPG pipeline</td>
</tr>
<tr>
<td>or expanding Petroleum and Petroleum Products</td>
<td>accordingly.</td>
</tr>
<tr>
<td>Pipeline</td>
<td>2. Dhamra LPG terminal can feed 3.6 MMTPA into the pipeline and can subsequently augment</td>
</tr>
<tr>
<td></td>
<td>according to demand scenario.</td>
</tr>
<tr>
<td>b. Other aspects of the proposal</td>
<td>1. PNGRB to take cognizance that Adani Gas Ltd has already put an EOI last year for</td>
</tr>
<tr>
<td></td>
<td>Dhamra to Asansol &amp; Dattupulia for which PNGRB has initiated the process and open</td>
</tr>
<tr>
<td></td>
<td>house meeting was conducted successfully.</td>
</tr>
<tr>
<td></td>
<td>2. We still wait on decision of PNGRB to accord IOCL pipeline as common carrier or</td>
</tr>
<tr>
<td></td>
<td>process ahead with the BID process of the Dhamra LPG pipeline.</td>
</tr>
<tr>
<td></td>
<td>3. We see this EOI as a parallel proposal to existing EOI put up by AGL last year.</td>
</tr>
<tr>
<td>c. Any Other issues</td>
<td>Nil</td>
</tr>
</tbody>
</table>

Date: 09.12.2017
Place: Ahmedabad

[Signature]
Mukul Tewari
DGM- LPG

Adani Ports and Special Economic Zone Ltd
Adani House
Nr Mithakhali Circle, Navrangpura
Ahmedabad 380 009
Gujarat, India
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Registered Office: Adani House, Nr Mithakhali Circle, Navrangpura, Ahmedabad 380 009, Gujarat, India
The Secretary,
The Petroleum and Natural Gas Regulatory Board
1st Floor, World Trade Centre
Babar Lane, Barakhamba Road
New Delhi-110001

Subject: Public Notice No. INFRA/PPL/46/ADLLP/PDPRPL/01/17

Ma’am,

Vide subject public notice dated 09.11.2017, PNGRB had announced commencement of the public consultation process, by web-hosting Expression-of-Interest received from the proposed consortium of AARDVARK DEVELOPERS LLP & H-Energy Private Limited for Petroleum and Petroleum Product (LPG) Pipeline from Paradip to Raxaul and sought views in writing on the said EoI, within 30 days of the publication of the notice.

Views of Indian Oil Corporation Limited (IOCL) on the aforementioned EoI public notice, in the prescribed format, are given in the enclosed Annexure-1 (2 pages) to this letter.

Thanking you,

Yours Sincerely

(S.K. Jha)
Chief General Manager (Projects-System & Gas)
Format for submission of Views on the Expression of Interest for
<Petroleum and Petroleum Product Pipeline from Paradip to Raxaul via Haldia, Durgapur,
Patna, Muzaffarpur, Motihari>

<table>
<thead>
<tr>
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<th>Public Notice No: INFRA/PPL/46/ADLLP/PDPRL/01/17 dated 09.11.2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Name of the entity / person</td>
<td>Indian Oil Corporation Ltd.</td>
</tr>
</tbody>
</table>
| 2. Complete address                           | Indian Oil Corporation Ltd.
|                                               | Pipelines Division, Indian Oil Bhawan, A-1, Udyog Marg, Noida-201301, UP |
| 3. E-mail ID / telephone / fax                | Jhash2@indianoil.in
|                                               | +91-120-2448701                                                   |
| 4. Identification proof (in case of an individual person) | N.A.                                                              |
| 5. Views and suggestions related to:         |                                                                  |
| (a) Petroleum Products Pipeline proposed by the entity for laying, building, operating or expanding Petroleum and Petroleum Products Pipeline | 1. IOCL would like to submit to PNGRB that there are certain submissions in the Schedule-A of EoI for Petroleum and Petroleum Product (LPG) Pipeline from Paradip to Raxaul; submitted to PNGRB vide letter ADLLP/BDD/PNGRB/PHDPM/PRL/001 dated 11.4.2017, related to IOCL, which are not correct and quoted without any discussions/agreement of IOCL.

- On the page no. 4 of Schedule-A, it is indicated that “The injection points for the proposed pipeline are from IOCL’s Paradip refinery, Haldia refinery, Barauni refinery and IOCL’s LPG import terminal at Paradip”

- On the page no. 5 of Schedule-A, it is said that “The delivery points of the proposed pipeline will originate from bottling plants of IOCL at Durgapur, Kalyani, Barauni, Patna, Muzaffarpur and proposed bottling plants at Motihari”

- On the same page, it is mentioned that “products would be made available from IOCL’s Paradip refinery, IOCL’s Barauni refinery, IOCL’s Haldia refinery and IOCL’s import facilities at Paradip”

With respect to above submissions, it is put on the record that IOCL has not entered into any discussions/understanding with M/s AARDVARK DEVELOPERS LLP for providing connectivity of the pipeline proposed by them, to either any of
IOCL’s Refinery located at Paradip, Barauni, Haldia or IOCL’s bottling plants at Durgapur, Kalyani, Barauni, Patna and Muzaffarpur. Same is also applicable in case of IOCL’s import facilities at Paradip.

2. Under point No. C-2(A) of Schedule A, M/s. AARDVARK Developers LLP, has mentioned that “The proposed Paradip-Haldia-Durgapur-Patna-Muzaffarpur-Motihari-Raxaul LPG pipeline will originate from Paradip Refinery”. We would like to inform PNGRB that IOCL has no surplus LPG available at Paradip Refinery as well as its other refineries at Haldia and Barauni after meeting its own captive requirements.

3. IOCL is already executing a captive LPG pipeline from Paradip Refinery i.e. Paradip-Haldia-Durgapur LPG Pipelines linking its bottling plants at Balasore, Budge-Budge, Kalyani & Durgapur. About 90% of the work has been completed in this project and Paradip-Balasore section of this pipeline has already been commissioned.

4. It is also to inform that IOCL has already submitted an application to PNGRB, seeking their permission for conversion of its Paradip-Durgapur-Patna LPG pipeline to Contract Carrier pipeline for sharing capacity with other Oil Marketing Companies. PNGRB’s decision on the said matter is pending.

In view of the above, it may not be appropriate to consider EoI for this pipeline which is parallel to IOCL’s LPG pipeline at this stage, without PNGRB, communicating its decision on IOCL’s application for conversion of its Paradip-Durgapur-Patna LPG pipeline to Contract Carrier.

| (b) Other aspects of the proposal | - |
| (c) Any other issue | The information/submission is without prejudice to IOCL’s rights and contentions under law. |
LPG.HQ.LOG.7.Pipeline

01 December 2017

The Secretary,
Petroleum & Natural Gas Regulatory Board,
1st Floor, World Trade Centre,
New Delhi – 110001

Dear Sir,

Subject: EOI from the proposed consortium of AARDVARK Developers LLP & H-Energy Private Limited to lay, build, operate or expand Petroleum and Petroleum Product (LPG) pipeline from Paradip to Raxaul Via Haldia, Durgapur, Patna, Muzaffarpur, Motihari

This has reference to the Public Notice No: INFRA/PPL/46/ADLLP/PDPRL/01/17 dated 09.11.2017 on the subject matter.

At this stage, Bharat Petroleum Corporation Limited does not have any comments to offer, though we do have interest to know the details. Thus, we would like to participate in the open house as and when conducted by the Board.

Thanking you,

Yours truly,

For Bharat Petroleum Corporation Limited

S. Mallick
Chief General Manager Logistics (LPG)