

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
(SOUTHERN ZONE), CHENNAI**

Original Application No. 193 of 2020 (SZ)

In the matter of:

Tribunal on its own motion -SUO MOTU
Based on the News item in Dinamalar Newspaper,
Chennai edition Dt. 24.09.2020, "Paddy field
With crude oil as ONGC pipelines leaks'

.....Applicant

Versus

1. The Chief Secretary to Govt. of Tamil Nadu,
Govt. Secretariat, Fort St. George,
Chennai, Tamil Nadu – 600 009 & 8 others

.....Respondents

INCIDENT REPORT OF ONGC

The 8th and 9th Respondent (ONGC) states as follows:

1. The above application is a Suo-moto application taken on file by this Hon'ble Tribunal based on the following news article:

*"Indian Express Chennai Edition, dated 24.09.2020 under the caption **"Paddy field filled with crude oil as ONGC pipeline leaks"** and also another newspaper report published in Dinamalar Newspaper Chennai Edition on the same day.*

It is seen from the newspaper reports that there was a leakage of crude petroleum oil developed in the transmission pipe on Tuesday and the oil spilled into the samba paddy field of a farmer at Erukkattur Village near Tiruvarur.

It is alleged in the report that the oil spilled due to the leakage in one of the ONGC underground pipelines that was laid for transporting crude oil, produced by the Company at Kamalapuram Oil Well. They said when the authorities were contacted, it was informed by them that they will be taking steps to remedy the situation including the payment of compensation. It is also mentioned that the leakage was arrested."

R Ravi Kumar

R.RAVI KUMAR
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BRIEF INTRODUCTION ABOUT ONGC (9th RESPONDENT)

2. The 9th Respondent (ONGC) is an Indian public sector multinational crude oil and gas company which is a Central Government Undertaking under the administrative control of the Ministry of Petroleum and Natural Gas (MoPNG). It is the largest oil and gas exploration and production company in the country, and produces around 70% of India's crude oil (equivalent to around 57% of the country's total demand) and around 84% of its natural gas. In November 2010, the Government of India conferred the Maharatna status to ONGC.

3. It is submitted the scope of the Suo Motu proceedings pursuant to the incident reported in the news item dated 24.09.2020 is limited. This Respondent is following best practices to ensure safety while sub-serving public interest, particularly in ensuring that a precious resource like natural gas benefits the national economy and the people at large. Without prejudice to the foregoing, this Respondent sets out the facts relating to the above minor incident, the safety measures adopted and corrective action taken as follows:

SEQUENCE LEADING TO THE INCIDENT

4. ONGC is into crude oil exploration and production activities from different fields located at Thiruvarur District for the past more than three decades. By order dated April 2018 (**Annexure R-1**) issued by District Revenue Officer, Thiruvarur compensation was fixed as Rs. 1,10,000/- per acre/per annum to the land owners who are cultivating paddy, cotton, urud dal and sugarcane 01.01.2018 to 31.12.2020 after detailed deliberation with Government Officials and representations of farmers.

5. On 22.09.2020, a flow line leakage was reported by the local people in Kizh Erukattur Village near ONGC's well at 23:15 hrs. Subsequently ONGC crew from Kamalapuram EPS (Early Production System) rushed to the well sites and closed the wells at 23.45 hrs. The line was also depressurized from KMP EPS end and leakage was totally stopped.

6. On 23.09.2020, an in-house Committee visited the area and assessed the damages caused in the presence of State Revenue Officials. The

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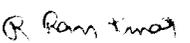
incident took place at R.S. No. 72/1, Erukkattur Village, Koothanallur Taluk in Tiruvarur District and noticed that leakage had occurred in KMP#58 & 63 line passing through land belonging to Mr. S.Dhanasekaran S/o Mr. Sivaperuman. ONGC duly intimated about the action taken by them to District Collector, Thiruvarur on 23.09.2020 **(Annexure R-2)**. The compensation amount negotiated with land owner for 0.40.5 Hec and fixed by the Committee is as follows:

Rate per ARE (in Rs) for paddy	2717
Extent Damaged (in Hectares)	0.40.5
Compensation Amount negotiated (in Rs)	1,10,000/- (Rupees One Lakh Ten Thousand Only)

7. The report of the Committee for assessment of compensation due to leakage is filed as **Annexure R-3**. ONGC duly intimated about the action taken by them TNPCB, Nagapattinam on 24.09.2020 through WhatsApp which is filed as **Annexure R-4**. The Report submitted by the Village Administrative Officer dated 24.09.2020 is filed as **Annexure R-5**. The land owner also submitted applications seeking for compensation of damaged cultivation land due to oil spillage. The Application dated 27.09.2020 is filed as **Annexure R-7**.

8. As a part of safety measures, an in-house Committee was formed by ONGC to investigate into the incident. The order forming the Committee dated 06.10.2020 is filed as **Annexure R-8**. The terms of reference for the enquiry are as under:

1. *Details of the accident*
2. *Reconstruction of the event/sequence leading to the accident.*
3. *Observation of the committee bringing out the contributing factors resulting in the accidents related to.*
 - a. *Material/Equipment factors*
 - b. *System/Procedural factors*
 - c. *People factors*
 - d. *Usage of PPE/other safety items*


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e. Any other factors as per the committee

4. Cause of the accidents and the root cause(s) of the accident.

5. Responsibility for the lapses should be clearly recorded in the report. In case no one is held accountable, the same should be recorded with due justification in the report.

9. The in-house Committee consisting of three eminent members submitted its report dated 08.10.2020 (**Annexure R-9**). The Committee observed that the minor leak was arrested completely within short time without causing any personal injury or property or major environmental damage. The Committee has given the following recommendations:

1. It is recommended to identify & replace all the gas/oil flow lines as per the standards derived in OISD STD 233

2. Pressure (Hydro) testing of flow lines as per OISD standard 233 to be carried out every two years.

3. Oil corrosion inhibitor dosing may be carried out on regular basis.

4. Frequent patrolling of the flow lines is being carried out and needs to be continued and records to be maintained for the same as per OMR.

The above recommendations by the committee is already being followed diligently as part of the in-house safety measures of ONGC.

10. By order dated 09.10.2020 (**Annexure R-10**), ONGC forwarded a letter to the District Collector Thiruvarur informing that necessary modalities have been initiated to pay the compensation amount at the earliest; that the spilled oil from the field was recovered totally; that the leakage point has been clamped and the line is isolated; that the refilling of the soil in the affected area shall be taken up after the cultivation/monsoon season as agreed by the land owner in the presence of Village Administrative Officer. A sum of Rs 1,10,000/- has been paid to the land owner on 28.10.2020 and the acknowledgment given by the land owner is filed as **Annexure A- 11**.

(Signature)

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11. The details of safety measures being adopted by ONGC to monitor the flow lines are given below:

- a) *Periodical replacement of old corroded lines.*
- b) *Regular patrolling of the flow lines being done for visual observation and detection of any leakage on the surface.*
- c) *Regular batch dosing of Oil Corrosion Inhibitor is being done at the well site to ensure the life of the flow line. Proper drawings of pipe line in critical routes viz road crossings, road and rail bridges are being maintained at respective Installations and those locations are checked regularly.*
- d) *Pressure testing of all the flowing wells (1.1 time of the maximum operating pressure) is being carried out once in two years as per OISD 233.*
- e) *The villagers and public are sensitized about the consequences of the leakages and they have been advised to inform the ONGC authorities in case of any eventuality of leakage. Display of important phone numbers at the well sites in order to contact the concerned person of ONGC for immediate and timely action.*

12. It is pertinent to state that pipeline integrity is checked by ONGC once in five years by way of Hydrotesting of the pipeline and pressure testing of the line with the existing well fluid once in every two years. (OISD 233). Measures for determining the internal cracks, erosion and corrosion of the pipeline using inline inspection is a new technology and ONGC is pursuing with the vendor. The contract for inline inspection methods are in initial phase of estimation and likely to be awarded by end of the Financial Year 2020-2021. Once the contract is in place, internal conditions like corrosion and thickness of all the major and critical pipelines will be checked. Based on the condition, the weak portions will be proactively replaced thereby avoiding any future chance of leakage. As the existing flowlines are non piggable, regular Liquid N2 application/hot oil circulation is being done, to clear water accumulation and to avoid formation of sludge/scales inside the pipe line thereby minimizing the corrosion.

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13. Presently all pipelines laid are 3 layered poly-ethylene coated pipes to avoid external corrosion. Moreover, Cathodic Protection exists for all the trunk pipelines. Measures are also being taken to execute the same in the well flowlines for recently laid pipelines through a contract which will be in place by January 2021. Remaining pipelines will be cathodically protected in a phased manner. Oil Line Corrosion Inhibitor being used is procured as per Standard Corporate Specifications and the efficiency of the chemical is tested at ONGC Regional Labs using the well fluids of the Asset. Dosage Rate and Batch Dosing of Corrosion Inhibitor in flow lines are carried out as per the recommendations of the ONGC Research Institutes. Analysis of well fluid characteristics are being carried out regularly in the field laboratories.

14. It is submitted that in O.A. No. 66 of 2020 pending before this Hon'ble Tribunal, a Committee has already been formed with respect to line leakage at Kizhpadugai on 28.04.2020 at KMP # 44 and Kizh Erakkatur on 06.04.2019 at KMP # 46 and 48. Proactive measures have been suggested by the Committee with respect to soil restoration and fertility which ONGC would implement. The report of the committee has not yet been filed. It is submitted that ONGC is operating in the said region for more than three decades and the public are well aware of the consequences of the leakage and they immediately informed ONGC crew working round the clock throughout the year. Display of important phone numbers at the well sites in order to contact the concerned person of ONGC is filed as **(Annexure R- 12)**

15. It is submitted the scope of the suo motu proceedings pursuant to the incident reported in the news item dated 24.09.2020 is limited and this Respondent is following best practices to ensure safety while subserving public interest, particularly in ensuring that a precious resource like natural gas benefits the national economy and the people at large. This is prime need, particularly in this crisis caused by the Covid19 pandemic and resultant lockdown imposed under the Disaster Management Act, which has almost crippled industrial growth and unprecedented slowdown. At this stage, every authority needs to function and act in a manner as to mitigate and control the adverse effects of the crisis/disaster as stipulated under the provisions of the Disaster

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Management Act, while ensuring continuity of operations and public safety. This Respondent is pursuing all other requirements and procedures with the relevant authorities as described above in a bona fide manner. Hence it is just and necessary that the proceedings be closed.

It is therefore prayed that this Hon'ble Tribunal may be pleased to close the above Original Application and thus render justice.

Dated at KARAIKAL this the 3rd day of November 2020

Counsel for Respondent

R. Ravi Kumar
Respondent

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.....Respondents

VERIFICATION AFFIDAVIT

I, R. RAVIKUMAR S/o. T. K. R. RAJAN aged about 52 years, presently working as GENERAL MANAGER (PRODUCTION) do hereby state on solemn affirmation as follows:

1. I state that I am the Employee of the 9th Respondent, ONGC (India) Ltd., in the above said case and know the facts leading upto the case. I am swearing to this affidavit on behalf of the 8th and 9th Respondent and I am authorized to swear to the same.
2. I further state that the statements made in para 1 to 15 of the accompanying incident report are true to the best of my knowledge, belief and information.
3. I state that what is stated above are true and correct.

R. Ravi Kumar
x **R. RAVI KUMAR**
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ONGC, Cauvery Asset
Karaikal - 608 604

VERIFICATION

I, R.RAVIKUMAR, aged 52 years, son of T.K.R.RAJAN working at ONGC, CAUVERY ASSET, NERAVY COMPLEX, KARAIKAL the deponent above named do verify and state the statements made in para 1 to 15 of this affidavit are true and correct and I swear to the same.

Place: KARAIKAL

Dated: 03 .11.2020

R Ram Kumar
Deponent

R.RAVI KUMAR
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[Handwritten Signature]
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