

Compliance of Environmental Clearance conditions for the period 1st April, 2025 to 30th September, 2025

Project: Setting up a Grass Root 9 MMTPA Refinery cum Petrochemical Complex project at Tehsil Pachpadra, District Barmer (Rajasthan) by M/s HPCL Rajasthan Refinery Limited (HRRL).

Reference No.: F. No. J-11011/87/2013-IA-II(I) dated 13th September, 2017 and its amendment dated 31st January, 2020 by Ministry of Environment, Forests and Climate Change, Gol.

15. Compliance of terms and conditions (Specific Conditions)

(i)	Consent to Establish/Operate for the project shall be obtained from the State Pollution Control Board as required under the Air (Prevention and Control of Pollution) Act, 1981 and the Water (Prevention and Control of Pollution) Act, 1974.	<p>Complied.</p> <p>CTE obtained on 8th Jan 2018 from RSPCB (order no: 2017-2018/HDF/2618). Further, CTE extension obtained upto November, 2024 from RSPCB vide letter no. F5/(O&G-329)/RSPCB/OGM/584-586; dated: 10/08/2022 is hereby further extended up to 31.12.2025 vide letter no. F/(O&G-329)/RSPCB/Barmer/48-50; dated: 27/09/2024. And now application for CTE extension upto 31.12.2026 has been made to RSPCB vide HRRL letter No. HRRL/RSPCB/RRP/ENV/CTE/AU/MS/2025/L/677, dated 26.08.2025.</p> <p>Consent to Operate (CTO) for Utilities block has been granted separately by RSPCB with vide letter no. F(Tech) / BALOTRA(Pachpadra) /7898(1)/ 2024-2025/1835-1837, dated: 21.10.2024 and this CTO is valid for a period from 16/02/2024 to 31/01/2029. Issued CTO is valid only for Utilities Block which is part of RRP Complex. It covers mainly Compressed Air+N2, RO-DM Plant, Raw Water Treatment Plant, Condensate Polishing Unit, Effluent Treatment Plant, Refinery Cooling Water System (CT-1), Sulphur Block Cooling Water System (CT-5). CTO for Refinery Units and Utilities units applied to RSPCB in June 2025.</p>
(ii)	As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises. The effluent discharge, if any, shall conform to the standards prescribed under the Environment (Protection) Rules, 1986.	<p>Agree to comply.</p> <p>Zero Liquid Discharge (ZLD) for the refinery is ensured and no waste/treated water shall be discharged outside the premises. All effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986.</p>
(iii)	Necessary authorization required under the Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016, Solid Waste Management Rules, 2016 shall be obtained and the	<p>Being Complied.</p> <p>Authorizations for construction related Hazardous waste taken from RSPCB dated October 10th, 2023 vide authorization No. RPCB/HWM/2023-2024/Oil</p>

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	provisions contained in the Rules shall be strictly adhered to.	and Gas/HSW/1. Fresh application for Operation Phase Hazardous waste shall be taken.
(iv)	Environmental Standards for Petroleum Oil Refinery dated 18th March 2008 and Environmental Standards for Petrochemical (Basic and Intermediates) dated on 9 th November, 2012, and its amendments from time to time shall be followed.	Agree to comply.
(v)	To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. Multi-cyclone followed by bag filter shall be provided to the DCU coke based CFBC boiler to control particulate emissions within permissible limit. The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.	Complied. Dust Extraction system is provided at outlet of Coke crusher within DCU and at bunker loading area of Captive Power Plant (CPP). All transfer point of conveyors is provided with dry fog type dust suppression system. Coke storage at coke yard is provided with Sprinkler Type dust suppression system. Adequate stack height is provided in all stacks as per CPCB/SPCB guidelines.
(vi)	Total water requirement shall not exceed 5300 cum/hr to be met from Indira Gandhi Canal. Necessary permission in this regard shall be obtained from the concerned regulatory authority. No ground water shall be used without prior permission from the CGWA.	Being Complied. Permission for withdrawal of water from Indira Gandhi Nahar Pariyojana (IGNP) is in place. No ground water shall be used without prior permission from the Central Ground Water Authority (CGWA).
(vii)	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	Agree to comply.
(viii)	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm, and solvent transfer to be done through pumps.	Agree to comply.
(ix)	Process organic residue and spent carbon shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed-Off to the TSDF. The ash from boiler shall be sold to brick manufacturers/cement industry.	Agree to comply. During Operation of CPP, efforts will be made to sell the fly ash produced from CFBC boilers to brick manufacturers/cement industry as advised in the EC letter granted by MoEFCC. ETP oily sludge will be routed to Delayed Coker Unit (DCU) for processing.
(x)	The Company shall strictly comply with the rules and guidelines under	Agree to comply.

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	Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	
(xi)	Fly ash should be stored separately. as per CPCB guidelines so that it should not adversely affect the air quality, becoming air borne by wind or water regime during rainy season by flowing along with the storm water. Direct exposure of workers to fly ash & dust should be avoided.	<p>Agree to comply.</p> <p>Fly ash collected from different locations of the boiler (including ESP, APH) shall be conveyed to Reinforced Cement Concrete (RCC) silo through dense phase system (closed conveying). RCC sump to collect floor wash at different location of fly ash handling shall be provided. Separate silos shall be provided for fly ash and bed ash. There shall be one common RCC silo for fly ash collection from two Circulating Fluidized Bed Combustion (CFBC) boilers in each power block with capacity of 5 days of operation of both CFBC boilers at MCR. Ash from all silos shall be directly unloaded into container trucks in dry form through unloading spout.</p> <p>There shall be two such unloading spout in each silo so that unloading can be done through two trucks simultaneously. Provision shall also be made at each fly ash silo to moisture the ash and unload it in the open truck for further disposal outside the refinery complex.</p>
(xii)	<p>The company shall undertake waste minimization measures as below: -</p> <p>(a) Metering and control of quantities of active ingredients to minimize waste.</p> <p>(b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.</p> <p>(c) Use of automated filling to minimize spillage.</p> <p>(d) Use of Close Feed system into batch reactors.</p> <p>(e) Venting equipment through Vapour recovery system.</p> <p>(f) Use of high-pressure hoses for equipment clearing to reduce wastewater generation.</p>	<p>(a) – (e) Agree to comply, as applicable.</p> <p>(f) Agree to comply during the Operation and Maintenance Phase of the Project.</p>

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(xiii)	<p>The green belt of at least 10 m width shall be developed in more than 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. As many as 25000 trees to be planted per year during first five years. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.</p>	<p>Being Complied.</p> <p>HRRL has acquired 4400.40 acres land from Government of Rajasthan. Total plot area of refinery and petrochemical (including Marketing Terminal) is 4126.95 acres. Total plot area of refinery and petrochemical (excluding Marketing Terminal) is 3876.95 acres. The allocated greenbelt of refinery area is 1279.38 acres and Marketing Terminal is 82.5 acres which is 33% of the total plot area within the Boundary line of Refinery Complex.</p> <p>AFRI has completed the Green Belt Study and released Detail Project Report (DPR) to HRRL. The DPR which has been prepared with the details of Green Belt development Plan was submitted to DFO, Barmer (Rajasthan) for necessary action. The Forest department replied that the proposed green belt area is saline water-logged area, due to which the survival potential of plants is very less. Forest department mentioned that the advanced soil work/plantation work mentioned in DPR prepared by AFRI Jodhpur is very technical in nature and it is not practical to get the work done.</p> <p>Later on, Forest and Environment Ministry, Rajasthan has suggested that HRRL should develop the green belt area as per the guidelines given in AFRI report.</p> <p>HRRL has planned to develop tree plantation in a phased manner considering the difficulties expressed by Forest Department. In 1st phase 5000 demo tree plantation in 11.25 acres is completed. In addition to above, HRRL has developed a nursery to support the plantation by cultivating saplings adapted to the local environment, 50000 plant saplings per year are being developed.</p>

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		A total of 40,000 saplings have been planted within the refinery premises during the period from April 2025 to September 2025.
(xiv)	All the commitment made regarding issues raised during the Public Hearing/ consultation meeting held on 30 th May, 2014 shall be satisfactorily implemented.	Agree to comply.
(xv)	At least 2.5% of the total project cost shall be allocated for Enterprise Social Commitment based on Public Hearing and item-wise details along with the time bound action plan shall be prepared and submitted to the Ministry's Regional Office.	<p>Being Complied.</p> <p>MoEFCC has accorded amendment in the EC vide letter no. F. No. J-11011/87/2013-IA-II(I) dated 31st January, 2020. The revised EC Condition is stated below:</p> <p>"At least Rs. 107.82 Crores (0.25% of the total project cost) shall be allocated for Corporate Environmental responsibility based on Public Hearing issues." CER proposals have been finalized in consultation with Government of Rajasthan (GOR):</p> <ul style="list-style-type: none"> ➤ Construction of alternate route from NH-025 km 92/800 to A/R Sajiyali Km 0/0 to 12/500 - Construction works of Sajiyali road is completed. ➤ Construction of BT road from NH-025 Km. 87/500 to A/R Sambhra Km 0/0 to 3/0. - Purchase Order for the construction of roads was placed on 24.12.2020. Sambhra - Jerla Road works completed and handed over to PWD in August 2022. ➤ Construction of Hospital of 50 bed capacity - Layouts and detailed Engineering completed for the Hospital building. Civil works are in progress for the Hospital. The OPD building is in advanced stages of finishing, and RCC and masonry works for the IPD building are in progress. ➤ Construction of Senior Secondary School - Construction works

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		<p>completed. Operationalized from the academic year 2025.</p> <ul style="list-style-type: none"> ➤ Avenue Plantation for 90 KM distance has been finalized in consultation with DC, Barmer. AFRI have conducted site survey and sample collection and released a DPR for the same. DPR handed over to Forest department for carrying out the Avenue plantation with funding by HRRL. ➤ Avenue tree plantation is being handled by Forest department as advised by DC-Balotra during recent review meeting. Forest dept to carry out the work on deposit work based on DPR. <table border="1" data-bbox="1126 738 2016 1278"> <thead> <tr> <th>S. No.</th> <th>Name of the Road</th> <th>Distance KM</th> </tr> </thead> <tbody> <tr><td>1.</td><td>Highway to Sambhra</td><td>4</td></tr> <tr><td>2.</td><td>Highway to Ashapura Mandir</td><td>1</td></tr> <tr><td>3.</td><td>Bagundi to Malwa</td><td>10</td></tr> <tr><td>4.</td><td>Pachpadra to Patodi</td><td>25</td></tr> <tr><td>5.</td><td>Pachpadra to Khed</td><td>10</td></tr> <tr><td>6.</td><td>Jerla to Sambhra</td><td>10</td></tr> <tr><td>7.</td><td>Highway to Mungra</td><td>10</td></tr> <tr><td>8.</td><td>Refinery to Champabery</td><td>5</td></tr> <tr><td>9.</td><td>Lakhe ki Beri to Sajiyali</td><td>9</td></tr> <tr><td>10.</td><td>Highway to Karni Mata Mandir</td><td>5</td></tr> <tr><td>11.</td><td>Highway to Chirdhani Mandir</td><td>1</td></tr> </tbody> </table>	S. No.	Name of the Road	Distance KM	1.	Highway to Sambhra	4	2.	Highway to Ashapura Mandir	1	3.	Bagundi to Malwa	10	4.	Pachpadra to Patodi	25	5.	Pachpadra to Khed	10	6.	Jerla to Sambhra	10	7.	Highway to Mungra	10	8.	Refinery to Champabery	5	9.	Lakhe ki Beri to Sajiyali	9	10.	Highway to Karni Mata Mandir	5	11.	Highway to Chirdhani Mandir	1
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(xvi)	For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	Agree to comply.																																				

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(xvii)	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Firefighting system shall be as per the norms.	Agree to comply.
(xviii)	Continuous online (24x7) monitoring system. Both for emissions and the effluent shall be installed within the plant site for measurement of discharge and pollutants concentration. Data shall be uploaded on the company's website and provided to the respective RO's of MoEFCC, CPCB and SPCB.	Agree to comply.
(xix)	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Agree to comply - During the Operation Phase of the Project.
(xx)	Wetland habitat shall be provided for migratory bird namely, Demoiselle Crane, at the reservoir and green belt areas.	<p>Agree to comply.</p> <p>The Pachpadra lake is a rain water lake formed mostly during rainy seasons and it has created a natural wetland habitation which attracts migratory bird like demoiselle cranes. This natural habitation is not affected and no impact on migratory birds has been noticed during a site visit and survey carried out in the vicinity of the project site and in and around Pachpadra lake by biological expert from EIA Consultant M/s EIL. This action on the natural wetland can be further enhanced or developed by taking guidance from subject matter expert agency in future as we progress.</p> <p>In this regard, a site survey and study were conducted by Jai Narain Vyas University (JNVU), Jodhpur, and the same has been completed, with recommended sites for wetland habitat development obtained. A Purchase Order has been placed for execution works for development of the site near the Township complex at Sambhra. However, district authorities have recommended other sites, i.e., Amartiya Talab and Harzi ka Talab near Pachpadra Lake, for wetland habitat development, for which survey and DPR works are in progress.</p>

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(xxi)	At least 10 natural surface water bodies shall be rejuvenated and developed as complete eco-system with the tree plantation development and growth using satellite imageries.	<p>Partially complied.</p> <p>A comprehensive list of 15 more water bodies is identified and obtained concurrence from DC Barmer. The following water bodies (10 Nos) have been identified by DC Barmer for rejuvenation: Sarla Nada, Kasaiyon Ki Nadi, Kher ka Talav, Bhaibahan Ka Nada, Gulab Sagar, Tejori Nadi, Kola Nada, Khari Nadi, Ram Ghat Talav, Navoda Talav.</p> <p>In first phase, rejuvenation works of 05 nos. of waterbodies have been completed. (Khari Nadi, Kohala Nada, Kasaiyon Ki Nadi, Chirdhani Mandir Talab, Diyar Nadi)</p> <p>In second phase, PO's Placed by watershed dept for rejuvenation works of 03 nos. of waterbodies i.e at Karnisar Talab, Rewada Talab, Tejudi Nadi.</p> <p>Further 02 nos. waterbodies rejuvenation works shall be taken up for execution upon submission of Survey and DPR from watershed department.</p>
(xxii)	The international boundary is reportedly at a distance of 100 -150 km from the project site. In view of the security apprehensions, necessary permission required, if any, shall be obtained from the Ministry of Defense and/or Ministry of Home Affairs.	<p>Complied.</p> <p>NOC has been renewed by the IAF HQ SWAC vide letter SWAC/2564/8/5949/ ATS (BM) dated 16th October, 2023 & the NOC is valid only for eight years from the date of its issue.</p> <p>Also, HRRL site is declared as Prohibited area on 18 September 2021 by home department GoR.</p>
15.1 Compliance of other general conditions		
(i)	The project authorities must strictly adhere to the stipulations made by the State Government, Central Pollution Control Board, State Pollution Control Board and any other statutory authority.	Agree to comply.
(ii)	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forest and Climate	Being complied.

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	Change. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	During the detailed engineering, there are a few changes in the product slate pattern and raw material mix of the proposed refinery cum petrochemical complex. In this context HRRL was engaged M/s EQMS Consulting Limited an accredited consultant organisation by QCI-NABET for assessment of "No Increase in Pollution Load". As per Office Memorandum of MoEFCC Notification No. S.O.980(E) dated: 02.03.2021 under clause no. 7 (ii) (c), for "No Increase in Pollution Load (NIPL)" certificate has been obtained from MoEFCC for further action, and application submitted to RSPCB for CTO of the entire HRRL refinery complex.
(iii)	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one station each is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	Complied. The locations of ambient air quality monitoring stations have been decided in consultation with the Rajasthan State Pollution Control Board (RSPCB). Three continuous ambient air quality monitoring stations have been installed—one each in the upwind direction, the downwind direction, and at the location where maximum ground-level concentrations are expected.
(iv)	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16 th November, 2009 shall be followed.	Being complied.
(v)	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall, conform to the standards prescribed. Under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	Necessary specification details shall be included in all the Engineering, Procurement & Construction (EPC) Contracts for implementation.
(vi)	The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and use the same	All water will be collected through storm water system in Guard Pond. Recharging the ground water is not envisaged due to High salinity of

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	water for the process activities of the project to conserve fresh water.	Ground water.
(vii)	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	Agree to comply. During the project phase, EPC Contractors are providing training to concerned workers and engineers who are involved in chemical handling. Pre-employment medical examination is being carried out for all workers and staff.
(viii)	The company shall also comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management and risk mitigation measures relating to the project shall be implemented.	Agree to comply.
(ix)	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villages and administration.	Agree to comply.
(x)	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Agree to comply.
(xi)	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/pollution control measures shall not be diverted for any other purpose.	Being complied. Fund provision has been envisaged for capital /recurring cost towards environment pollution control measures.
(xii)	A copy of clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban Local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal.	Complied. EC letter sent to following agencies: BDO - Panchayat Samiti – Balotra, CEO, Zilla Parishad – Barmer, Sarpanch - Sambhra Village, Sarpanch - SRK Village, RSPCB RO-Jodhpur, vide our letter dated October 5 and 9,

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		2017.
(xiii)	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEFCC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six-monthly compliance status reports shall be posted on the website of the company.	Being complied. The last compliance report for the period 1 st October, 2024 to 31 st March, 2025 was submitted to all statutory authorities in June, 2025 and the same has been uploaded on the HRRL website with following link. https://hrri.in/Hrri/EC_compliance.jsp
(xiv)	The environmental statement for each financial year ending 31 st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEFCC by e-mail.	Agree to comply. Form-V, Environmental statement shall be submitted to Rajasthan State Pollution Control Board after the Consent to Operate (CTO) is obtained before commissioning of the Project.
(xv)	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at http://moef.nic.in . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.	Complied. Environmental Clearance has been advertised on September 27, 2017 in Times of India (English) and Rajasthan Patrika (Hindi) Newspapers. A copy of the same has been sent to MoEF&CC Regional Office at Lucknow vide HPCL letter dated October 5, 2017.
(xvi)	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Being complied. Final approval of the project from MoPNG has been obtained on 9th October 2017. Financial closure was completed on 28th January 2019. Financial closure approval for revised project cost was obtained on July 4,

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		2023. The design and engineering has completed. Construction is in progress with overall physical progress of 89.1 % as of Sept 30, 2025.
16	The Ministry may revoke or suspend the clearance, at subsequent stages, if implementation of any of the above conditions is not satisfactory.	Agree to comply.
17	The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.	Agree to comply.
18	The above conditions will be enforced, inter alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Water Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Trans boundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Agree to comply.

