PETROLEUM EMPLOYEES UNION

Founder : **RAJA KULKARNI**
President : **K. H. DASTOOR**

(Regd. No. 1657)
AFFILIATED TO NFPW & INTUC.

Phone : 2418 17 42
E-mail : peumumbai@yahoo.co.in

Website : www.petroleumemployeesunion.com

SINCE : 1954

Date : 27.11.2025

To
Director (Production)
ONGC, N. Delhi.

Subject: Regarding serious concerns related to Offshore Safety, Production issues and Environmental Standards in B&S asset.

Sir,

As the elected representative of our offshore workforce, I am writing to emphasize the vital importance of maintaining robust safety and environmental standards across all offshore platforms under B&S asset. People posted at offshore in B&S asset operate in some of the most challenging and hazardous environments in the industry with highest exposure to H2S. Their safety must remain our highest priority in actual sense but currently it is only on the paper. Equally important is our responsibility to safeguard the marine environment in which we work.

Workers have raised several concerns that require your immediate attention. These issues are central to ensuring safe operations and preventing incidents that could harm personnel or the environment. Some of these issues also underline how we are wasting our hard earned money on the things which are not yielding any fruitful results. Please find the list of issues below, which will be expanded upon once all details are compiled:

I) Following are the Safety & Production issues from BPA Platform:

1. Fake Water Injection Data

Water injection is a vital procedure to maintain pressure and other parameters in reservoirs in order to sustain production. However, the water injection data provided by the platform is incorrect. BPA injects **45,000 bbl per day** at **125 kg/cm²** pressure from the platform, yet only **7–10 kg/cm²** pressure reaches the VSEA and VSEC unmanned platforms. All the water injected from the platform is leaking into the sea.

This injected water is extremely costly, as the process involves one seawater lifting pump with a **350-kW motor**, one vacuum pump with a **55-kW motor**, two booster pumps with **37-kW motors** each, and two main injection pumps with **950-kW motors** each. Crores of rupees worth of gas are burned to generate the power required to operate these motors. A huge amount of money has also been invested in building this water injection system.

The loss in production due to this fake and faulty system is immeasurable. In addition, multiple chemicals are injected into the seawater, which are very harmful to the environment.

2. Improper Produced Water Conditioning Process

Our organisation's core activity is oil and gas exploration and production, with clean and green energy recently added as a new portfolio. In accordance with environmental regulations, the **safe limit for discharging produced water into the sea is 40 PPM**. However, this limit is currently **not being achieved at the platform.**

At present, the produced water contains **400–500 PPM** of oil, forming a thick layer that is consistently being discharged into the sea. This practice is **unsafe for the marine environment** and results in a **significant loss of recoverable hydrocarbons**, as the oil present in the produced water should be separated before disposal.

The separation process is intended to be carried out through the **Produced Water Conditioning (PWC) system**, which is installed across platforms in the BPA Platform of **B&S Asset**. However, it has been observed that **all PWC units have remained non-operational for several years**. This prolonged non-functionality has led to:

- **Substantial loss of crude oil**, which could otherwise be recovered through proper conditioning
- **Continuous discharge of high-oil-content water**, causing environmental degradation
- **Non-compliance with statutory discharge limits and safety standards**

Immediate restoration and commissioning of the PWC system are essential to ensure environmental protection, regulatory compliance, and improved production efficiency.

3. Bypassed Detectors and Sensors

Most detectors and sensors on the platform are either non-functional or bypassed. The following incident serves as evidence:

A fire broke out in the battery room at **BCPA-2 on** 27.04.2025. The FM-200 fire system activated, but the fire could not be extinguished because the doors were open. Twenty batteries were burned, but neither the fire alarm nor the fire shutdown system activated due to bypassed detectors. People only became aware of the fire the next morning, as they were asleep during the incident. The fire was later extinguished by the fire officer. The incident was reported merely as a spark and classified as a near miss.

4. Poor Condition of Unmanned Platforms

- No battery power or lighting is available on unmanned platforms such as **VSEA, VSEB,** VSEC, and BH.
- No SCABA devices are available on any of the unmanned platforms.
- Life rafts on most unmanned platforms are expired.

5. Excess POB (Persons on Board)

The current **POB is 265** persons, far above the platform's capacity of 176 persons.

Personnel are living in unsafe areas:

- Adjacent to the TG hall at the BCPA platform
- Under the TG hall at BCPA-2
- Above the TG hall and control room at the BPA platform

This is a serious safety concern for everyone on the platform.

II) Following are the Safety & Production issues from BPB Platform:

1. GAS LEAKS, H_2S, AND CRITICAL FAILURES IGNORED FOR MONTHS

Despite repeated reporting:

- BPB West ladder – continuous gas leakage
- BPB East ladder – gas leak near HP KOD
- B2 Primary & Secondary Fuel Gas – persistent leakage
- B1 Celler Deck – gas leakage
- BF Platform – major H_2S leakage, high enough to classify as life-threatening
- BPB IGG system – carbon particles leaking into air
- Hot damper system dead – forcing manual operation of dangerous equipment

Yet production continues, as if these hazards are insignificant.

2. ENVIRONMENTAL DAMAGE ACTIVELY HAPPENING—NOT A FUTURE RISK

- Sump caisson pump missing → condensate flowing directly into sea
- All unmanned sump systems dead → continuous oil discharge into sea
- Parallel plate separator failed
- Galley waste dumped into sea daily
- GCI skids (4–5 new units) installed but none working, causing line damage and leakage

These are not violations—they are open, ongoing environmental disasters.

3. FIRE & GAS SYSTEMS HAVE COLLAPSED COMPLETELY

- Fire Water Pump on BF – non-functional
- GDS – dead on all unmanned platforms
- CO_2 snuffing systems – damaged and useless
- PSHL – bypassed everywhere
- SS2 – override in most wells, SCADA shuts "only on paper"

The platforms are effectively running blind, unprotected, and unsafe.

4. LIVING CONDITIONS FOR EMPLOYEES ARE INHUMANE

- BF & BE Shelter Rooms – damaged, leaking, unsafe
- BLQ2 doors broken – wind and rain enter freely
- BLQ2 3rd floor – water leakage all rainy season
- Gratings on BF & BE – broken, one fall away from catastrophe
- No lighting in wellhead zones
- Damaged lifejackets, expired LSA
- No sleeping arrangements – employees sleep on checker plates with newspapers

This is not "hard duty work."

This is neglect.

5. SECURITY RISK: FISHERMEN INTRUDERS & THEFT

- Repeated theft of diesel, equipment, materials
- Attempted climbing of unmanned platforms in day and night
- Employees left without communication or security
- Intruder alarms – non-functional everywhere

We cannot call this "offshore safety".
This is operating platforms without basic security.

6. OPERATIONAL COLLAPSE HIDDEN UNDER PRODUCTION PRESSURE

- BS-13: No valves/material → wells flowed through chiksan line with safety bypassed
- BF: Majority of valves passing; shutdown avoided until absolutely forced
- BE: Test Separator damaged, condensate meter damaged, FWP not working → testing data manipulated on paper
- Tools unavailable → double sorties, cost escalation
- Overtime cost-cutting → sorties costing 10x more, but still preferred
- Paper says "international standards" → ground reality is exactly opposite

The system is failing, and we are pretending nothing is wrong.

B22 Platform – Critical, High-Value Equipment Lying Non-Functional With No Accountability

On B22 platform, several high-cost and safety-critical equipment have remained non-operational for an extended period, including:

- High-value switchgear panels
- Turbine Generator (TG)
- Separator packages
- Condensate pumps and other process pumps

These are not minor items. These are capital-intensive assets purchased with crores of public money, and their prolonged non-operation directly affects:

- Production reliability
- Platform safety
- Environmental compliance
- Asset life
- ONGC's financial performance

The fact that such equipment has been allowed to remain idle or non-functional for so long raises serious questions on responsibility, oversight, and accountability at multiple operational and managerial levels.

7.Crane System Observations under BPB:

- B22 Crane
  - Crane is operating without a canopy, posing a severe safety hazard for the operator.
- BF Crane
  - Crane is without a canopy.
  - Boom structural integrity is compromised
  - Engine overheating is occurring, resulting in hose degradation and subsequent leakage.
- BE Crane
  - Operator cabin is missing windshield/glass protection.
  - No seating provision is available for the operator.
  - Hydraulic hoses and fittings are heavily corroded, causing frequent leakage.
  - Overall condition is unsafe for continued crane operation.
- Lighting for Unmanned Cranes
  - No lighting is installed on unmanned cranes (B22 and BF), reducing operational visibility and increasing risk.
- B-2 East & West Cranes

- Both units are experiencing engine overheating.

• B1 South Crane
- Unit is currently non-operational.

• BPB East Cranes
- Cranes intermittently stop during operation due to cord failure, which can lead to potential accidents.

• B1 North Crane
- Hoses are found in a severely rusted condition.

• B2 Firewater Pump
- Pump is not functioning in automatic mode.

• BPB & BLQ2 Firewater System
- Firewater pump spark arrestor is non-functional.
- Explosion-proof canopy is damaged.

• B-2 Portable I/U Outlet
- Outlet is constructed from rubber material, making it susceptible to damage and increasing the risk of electrical failure and accidents.

8. Unmanned related issues of BPB:

• Master Bypass Key
- The master bypass key remains bypass all the time, preventing any automatic response during gas or fire detection events.

• ESD/FSD Loops
- Loops appear healthy for audit documentation; however, activation of pull-stations does not initiate any corresponding action.

• F&G Panels and Detectors
(BE, BF, B22, BS 13, B 149, B 147)
- F&G detection systems are non-functional except in BF.
- Although BF portable detectors are operational, no system action occurs following gas detection.
- ESD/FSD loops remain in bypass mode across the entire platform.

• Communication Systems (BS 13, B 149, B 147)
- Walkie-talkies are not connected to the platform.
- No telephone connectivity or SCADA communication is available.

• Power Supply Conditions (BS 13, B 149, B 147)
- Power supply has been insufficient for the past 6–7 months.
- With SCADA offline, wells cannot be shut in during emergency conditions.
- Shutdown valves are in a forced-open position.

• PSHL Condition
- PSHL on all wells remains in bypass mode.

• Accommodation/Night-Stay Area
- Area is unmanned and lacks adequate lighting provisions.

• BS 13 / B 149 Monorail
- Monorail system is non-operational.

• Potable Water System
- Anode rod is severely corroded and requires replacement.

III) Following are the Safety & Production issue from B-193 Platform:

1)Acid gas removal and Acid gas disposal Unit: -

The H2S is already one of the toxic gases, which is in abundance at B193. The 100 PPM gas is enough to brain dead a healthy person. We burn the H2s at 800 degrees Celsius and producing the Sulphur dioxide which is more fatal gas than H2S. The 50 PPM of SO2 can cause the death of person.

The system is envisaged to remove H2s from free/ associated gas received from the well head platform using amine absorption. The H2s /CO2 containing off gas is incinerated and scrubbed into water soluble sulfates and disposed of into sea. Water soluble sulphates can cause Diarrhea and dehydration in high concentration. Caustic sulphate used in scrubbing SO2 has adverse effect like digestion problem and prolonged consumption can cause Ulcer. Drinking water with high sulphate levels can cause gastrointestinal issues due to the bitter taste. People with sensitive digestive system are more vulnerable to the effects of sulphates. Water with 500mg/L of sulphates may have an unpleasant taste which can limit consumption, which can cause dehydration.

By product of above system is sodium sulfite dumped into sea water . Sodium sulfite is a strong reducing agent that can be irritating to the skin, eyes, and respiratory system and it reacts with strong acids and oxidants.

IV) Following are the Safety & Production issues from Tapti Platform:

1. Bypassed Safety Systems:

• The TPP F and G system and the fusible loop have been in a bypassed condition for several years. Specifically, the fusible loop on the main deck of the Tapti Compression Process Platform (TCPP) has been bypassed for three years, along with the fusible loop pressure transmitter.

• All Emergency Shutdown (ESD) and Fire Shutdown (FSD) signals from TPP to TCPP have also been bypassed.

2. Faulty Detection Systems:

• Several gas and flame detectors in critical machinery such as the PGC and GTG are currently in a faulty state while still in operation.

3. Life Boat Maintenance:

• Safety checks for Life Boat No. 3 have not been conducted for over a year, and its condition is not ready for any emergency situation.

4. Living Conditions:

• The lack of blankets and beds on the platform has forced employees to sleep in recreation halls, conference rooms and gyms without proper bedding.

5. Cranes:
• Cranes on unmanned platforms are in a deteriorated state posing potential safety risks.

6. Workplace Harassment:
• We have experienced harassment from Mr. Rajesh Tiwari regarding leave approvals, even in cases of medical emergencies. In one incident, an officer was in tears after being denied leave, despite the validity of his medical report. Mr. Tiwari has frequently questioned the legitimacy of medical documentation.

Concerns at Unmanned Platforms under Tapti:

7. Safety Equipment:
• Heli-deck nets are in a deteriorated condition and there are no wind socks available.
• The F&G system is non-functional and ESD/FSD loops are bypassed or isolated on some platforms.
• The intruder system and CO2 snuffing systems across all platforms are non-functional.

8. Basic Necessities:
• There is a lack of blankets, mattresses, and proper shelter at unmanned platforms, leading to health issues among employees due to cold conditions.
• Contractual manpower is not receiving adequate basic needs such as food, blankets and water for extended periods. As well Despite non-availablity of supporting boat, long duration night stay (3-4 days) are conducted without any concern for health and safety of personnel at unmanned platform.

9. Health and Safety Supplies:
• There is no first aid box available, or existing supplies are expired. Some life buoys are missing ropes and lights and SCBA sets are expired.
• Proper tools for work are lacking and gratings are broken at the well-head section.

10. Food Supply Issues:
• Standby boats frequently refuse to provide daily meals at unmanned platforms, exacerbating the situation.

11. Sanitation Concerns:
• We respectfully request the Standard Operating Procedure (SOP) for sanitation at unmanned platforms, as the absence of toilet facilities necessitates that personnel resort to open defecation. This practice poses significant health and safety risks, including the potential for falls and other life-threatening incidents while attempting to manage such a basic need.

Given the seriousness of these concerns, I respectfully request an in-person meeting to present these matters formally and to work collaboratively toward effective and sustainable solutions. Open dialogue between workforce representatives and leadership is essential for improving safety culture and ensuring that risks are addressed before they escalate. From

the issues it is very clear that decision makers should not rely on paperwork which suggest everything/every system is functioning perfectly.

I look forward to your prompt response and to scheduling a meeting at your earliest convenience.

Thank you for your attention to this crucial matter.

Yours faithfully

27/1/25

(Santosh J Patil)
General Secretary

Copy to:

1. CEO, ONGC, N.Delhi.
2. Director (HR) ONGC, N.Delhi.
3. Director (T&FS) ONGC, N.Delhi.
4. ED – WOU, V.Bhavan, Mumbai.
5. Chief HR Service, NBP, Mumbai.
6. ED-Asset Manager B&S Asset, VB, Mumbai.
7. GM (HR) I/C IR, NBP, Mumbai.