

**BEFORE THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA**

APPEAL NO 18 of 2023

IN THE MATTER OF

HARIPADA MANNA .Appellant

Versus

STATE OF ODISHA &Ors ...Respondents

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PLACE: Bhubaneswar



DATE: 04/05/2024

SANKAR PRASAD PANI

ADVOCATE

Plot 2132/4814, NageswarTangi, Bhubaneswar 751002 Cell-

9437279278,Email: sankarprasadpani@gmail.com

**BEFORE THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA**

APPEAL NO 18 of 2023

IN THE MATTER OF

HARIPADA MANNA .Appellant

Versus

STATE OF ODISHA &Ors ...Respondents

REJOINDER AFFIDAVIT ON BEHALF OF THE APPELLANT

1. I, Haripada Manna, S/o Late Paresh Chandra Manna, Aged about 53 years, Resident of Sekhsarai, Po-Chalanti, PS-Jaleswar, Dist-Baleswar Odisha, 756032, do hereby solemnly affirm, and declare as under:

2. That the Affidavit of DM Balasore suggest that in Page 12 , proceedings of meeting dated 16/02/2023 states that field visit was made by committee from 16/01/2023 to 20/01/2023 to know the **feasibility of the sources. It is submitted that 213 different sairat** sources/quarries/sand mining sources/Brick Earth Mining/Stone quarries have been mentioned in the list which were finalised in the DSR. The applicant pray for copy of inspection report with specific observation in respect of quarries and specific dates of visit with respect to the quarries.

3. It is submitted that the issue before this Honble Tribunal is the method adopted for Survey of the potential sources for mining which is very

foundation of DSR report and as no specific observation with respect to quarries are there in the proceedings of the meeting except one line and vague statement and opined that all visited sources are suitable and feasibly. It is submitted that the Appellant in his Appeal as well as in the previous OA 63 of 2020 has clearly stated that Survey were not conducted and no specific findings/observations about the sources in the report.

4. That the Appellant challenges District Survey Report for Sand Mining, Balasore prepared by the District Collector, Balasore. The DSR being foundation of Scientific and Sustainable Sand Mining needs to be done in true spirit, else the orders of Honble SC and NGT will be defeated and there by the idea of sustainable sand mining will have no meaning. The Appellant submits that the DSR as uploaded in the District website is incomplete, inadequate and inconsistent with spirit and letter of Sustainable Sand Mining Guideline and does not consider the ground reality and other grounds listed as follows

- I. That the DSR is not in conformity with the Sustainable Sand Mining Guideline 2016 and 2020
- II. DSR prepared is not in compliance with the order of Honble NGT dated 8/02/2022 in OA 63 of 2020

- III. The DSR is said to be an **Interim Report** as mentioned in the conclusion part of the report for which the same cannot be relied for taking any final decision in respect of any auction of minor mineral as the DSR is mandatory prior to auction.
- IV. The report does not identify the feasible mining sites, deposition site, erosion prone sites and sites of ecological importance. More importantly this is report without any ground survey and site visit by the members of District level Expert Committee has not been conducted prior to preparation of report
- V. The DSR is not in accordance with the Sustainable Sand Mining Guideline 2016 and 2020 and in utter disregard to the very objective of the sustainable sand mining.
- VI. The DSR so prepared is a sham and fraud on the statute and it is for name shake to escape from the rigors of law.
- VII. The report is not based on ground realities and no joint field visit has been carried out by the Water Resource Department, Mining Department and Tahasildar to assess the ground situation and the same is mandatory prior to the report. The report is signed by District Collector, Balasore but do not disclose about the members who have prepared

this report and whose inputs and expert opinions were considered for preparing the report. The Appellant has information that the report is prepared by one consultant without any field visit and same is evident from the report also and for that the report cannot be accepted.

- VIII. No replenishment study has been carried out to understand the replenishment rate of the Sand Mining Sources which is mandatory to arrest over exploitation and illegal sand mining.
- IX. The minimum distance of 2.5Km between two clusters have also not been followed while preparing the list of sand mining leases.
- X. Subarnarekha River is highly dynamic and River Bank Errosion observed at many places. Mechanical Sand Mining and Wooden Bridges in the river to facilitate the sand mining transportation has damaged the embankment but same were not considered while preparing the DSR to identify the vulnerable and erosion prone sites.
- XI. Comparative analysis of the Google Earth image clearly reveals that the mechanical and aggressive sand mining has changed the course of river stream, the leases granted are not the deposition area but the erosion area.

- XII. Mining activity in zone of erosion can further aggravate the problem of erosion and as such the mining activity can be allowed only in the zone of the deposition. However this aspect has not been considered while preparing the DSR.
- XIII. In fact earlier reports of Irrigation department apprehending the damages to embankment were being ignored. Further the report prepared without any consultation with the riparian stakeholders including local inhabitants and irrigation department.

5. That the **Hon'ble Supreme Court in its Order dated 10.11.2021** in Civil appeal No-3661-3662 of 2020 in the matter of **State of Bihar & others Vs Pawan Kumar & Others** have passed the following directions and relevant paras are extracted as follows

“8. Taking into consideration these aspects of the matter, we propose to issue certain interim directions.

9. The Tribunal, in the case of *Satendra Pandey* (supra), has found that the notification dated 15th January 2016, which provided Environmental Clearance to be given by the District Environment Impact Assessment Authority (hereinafter referred to as the “DEIAA”) was not in consonance with the judgment of this Court in the case of *Deepak Kumar v. State of Haryana and*

Others2 . The Tribunal therefore in *Satendra Pandey* (supra), had directed Ministry of Environment, Forest and Climate Change (hereinafter referred to as “MoEF and CC) to take steps to revise the procedure laid down in the notification dated 15th January 2016. It is to be noted that MoEF and CC, in accordance with the directions of the Tribunal, had issued Enforcement and Monitoring Guidelines for Sand Mining (hereinafter to referred to as “the 2020 guidelines”) in the

month of January 2020. Chapter 4 of the 2020 guidelines deals with identification of possible sand mining sources and preparation of DSR. It will be relevant to refer to Clause 4.1.1 (a), (o) and (p) of the 2020 guidelines:

“4.1 Identification of possible sand mining sources and preparation of District Survey Report (DSR)

4.1.1 Preparation of District Survey Report.

a) District Survey Report for sand mining shall be prepared before the auction/eauction/grant of the mining lease/Letter of Intent (Loi) by Mining department or department dealing the mining activity in respective states.

o) Potential site for mining having its impact on the forest, protected area, habitation, bridges etc, shall be avoided. For this, a subdivisional committee may be formed which after the site visit shall decide its suitability for mining. The list of mining lease after the recommendation of the Committee needs to be defined in the following format given in as

AnnexureII. The SubDivisional Committee after the site visit shall make a recommendation on the site for its suitability of mining and also records the reason for selecting the mining lease in the Patta land. The details regarding cluster and contiguous cluster needs to be provided as in **AnnexureIII**. The details of the transportation need to be provided as in **Annexure IV**.

p) **Public consultation**The Comments of the various stakeholders may be sought on the list of mining lease to be auctioned. The State Government shall give an advertisement in the local and national newspaper for seeking comments of the general public on the list of mining' lease included in the DSR. The DSR should be placed in the public domain for at least one month from the date of publication of the advertisement for obtaining comments of the general public. The comments so received shall be placed before the sub-

divisional committee for active consideration. The final list of sand mining areas [leases to be granted on riverbed & Patta land/Khatedari land, desiltation location (ponds/lakes/dams), M-Sand Plants (alternate source of sand)] after the public hearing needs to be defined in the final DSR in the format as per **AnnexureV**. The details regarding cluster and contiguous cluster needs to be provided in **AnnexureVI**. The details of the transportation need to be provided in **AnnexureVII**.”

10. It could thus be seen that in accordance with the 2020 guidelines, the DSR is required to be prepared before the auction/euction/grant of mining lease by Mining Department or Department dealing with mining activity in the respective States. It is further Provided that the potential site for mining having its impact on the forest, protected area, habitation and bridges should be avoided. For this, a subdivisional Committee is required to be formed which, after the site visit, is required to decide regarding the suitability of the sites for mining. The subdivisional committee is further required to record its reasons for selecting the mining lease in the patta land.

Various details are required to be given in the annexures appended to the said policy.

11. It is further to be noted that Appendix X of the notification dated 15th January 2016, issued by MoEF and CC also provides for composition of the subdivisional committee:

“A SubDivisional Committee comprising of SubDivisional Magistrate, Officers from Irrigation department, State Pollution Control Board or Committee, Forest department, Geology or mining officer shall visit each site for which environmental clearance has been applied for and make recommendation on suitability of site for mining or prohibition thereof.”

12. It is to be noted that with the advent of modern technology, various technological gadgets like Drones and satellite imaging etc. can be used for identification of the potential sites and Preparation of the DSR and also to check misuse and unauthorized mining.

13. We further find that when the 2020 guidelines as well as the notification issued by MoEF and CC of 2016 itself provide for constitution of subdivisional committees comprising of the

officers of the State Government from various Departments for identification of the potential sites for mining, there would be no necessity of the DSRs being prepared through private consultants as directed by the Tribunal in the impugned order.

The subdivisional committee consists of various officers from Revenue Department, Irrigation Department, State Pollution Control Board, Forest Department and Geology Mining Department of the State Government. They are better equipped to visit the sites and prepare the draft DSR for the concerned district. Apart from that, preparation of DSR through private consultants would also unnecessarily burden the public exchequer. We are therefore of the view that the direction in that regard issued by the Tribunal requires to be modified. We are further of the considered view that until the DSRs are finalized and granted approval by SEAC and SEIAA, it is appropriate that certain necessary arrangements are permitted so that the State can continue with legal mining activities. This apart from preventing illegal mining activities, would also ensure that the public exchequer is not deprived of its share in legalized mining.

14. We therefore find it appropriate to substitute the directions issued by the Tribunal vide judgment and order dated 14th October 2020, with the following directions:

(i) The exercise of **preparation of DSR for the purpose of mining in the State of Bihar in all the districts shall be undertaken afresh.** The draft DSRs shall be **prepared by the subdivisional committees consisting of the Sub-Divisional Magistrate, Officers from Irrigation Department, State Pollution Control Board or Committee, Forest Department, Geological or mining officer.** The **same shall be prepared by undertaking site visits and also by using modern technology.** The said draft DSRs shall be prepared within a period of 6 weeks from the date of this order. After the draft DSRs are prepared, the District Magistrate of the concerned District shall forward the same for examination and valuation by the SEAC. The same shall be examined by the SEAC within a period of 6 weeks and its report shall be forwarded to the SEIAA within the aforesaid period of 6 weeks from the receipt of it. The SEIAA will thereafter consider the grant of approval to such DSRs within a period of 6 weeks from the receipt thereon;

(ii) Needless to state that while preparing DSRs and the appraisal thereof by SEAC and SEIAA, it should be ensured that a strict adherence to the procedure and parameters laid down in the policy of January 2020 should be followed;

(iii) Until further orders, we permit the State Government to carry on mining activities through Bihar State Mining Corporation for which it may employ the services of the contractors. However, while doing so, the State Government shall ensure that all environmental concerns are taken care of and no damage is caused to the environment.”

6. It is humbly submitted that since no site visits were made for the preparation of District Survey Report and same is also evident from the information supplied by the Pollution Control Board vide letter dated 11/03/2024 in respect of the dates of visit, where the Regional Officer, State Pollution Control Board Balasore has furnished the details of tour programme from 9th January 2023 till 31st January 2023 and in all the dates there is no mention of any that Sub-divisional Committee had visited Sekhsarai source on 18/01/2023 and other sand sources from 16/01/2023 to 20/01/2023 site visit for the purpose of District Survey Report. Further the RTI reply dated 29/11/2023 by SPCB, Balasore only

refer to a letter dated 20/01/2023 for a proposed Sub-divisional level meeting dated 24/01/2023 for inclusion and exclusion of sources in District Survey Report. Hence claim of the District Collector Balasore in para 11 of the affidavit saying Site visit from 16th Jan 2023 till 20th Jan 2023 is false statement on oath. Copy of RTI Reply dated 24/11/2023 and 11/03/2024 is Annexed here with as **ANNEXURE-1A AND ANNEXURE-1 B**

7. That the appellant has also obtained the information relating to tour diary of Asst Executive Engineer Jaleswar irrigation Sub-Division dated 12/04/2024(wrongly written 2024) also suggest no site visit to Sekhsarai on 18/01/2023 or other sites from 16th Jan 2023 till 20th Jan 2023. THE APPELLANT HAS RECEIVED THE INFORMATION THROUGH POST ON 12/04/2023. Copy of RTI Reply dated 12/04/2024 is annexed here with as **ANNEXURE-2**
8. That the SEAC and SEIAA has approved the DSR based on the undertaking and relying on empty statement without any document or record of site visit and the reason for inclusion or exclusion of the sources, hence same can not stand the rigors of Sustainable Sand Mining Guideline 2016, 2020 and EIA Notification (Amendment) 2016 and in complete derogation of

Judgement passed by Honble NGT as well as Honble Supremcourt in Pawan Kumar Case. For this reason the Honble NGT may allow the appeal and set aside the DSR report for Balasore impugned in the present appeal along with the SEIAA approval dated 26/04/2023.

APPELLANT THROUGH

A handwritten signature in cursive script that reads "Spami". The signature is written in black ink and has a horizontal line underneath it.

ADVOCATE

BEFORE THE NATIONAL GREEN TRIBUNAL, KOLKATA

Appeal No. 18 of 2023

In re:

HARIPAD MANNA

APPELLANT

Versus

STATE OF ODISHA &Ors

RESPONDENTS

AFFIDAVIT

04 MAY 2024

I, I, Haripada Manna, S/o Late Paresh Chandra Manna, Aged about 53 years, Resident of Sekhsarai, Po-Chalanti, PS-Jaleswar, Dist-Baleswar Odisha, 756032, do hereby solemnly affirm, and declare as under:

- 1. That I am the appellant in the above mentioned Appeal
2. I am fully conversant with the facts and circumstances of the case and therefore competent to swear this affidavit.
3. That I have read over the contents of the accompanying Affidavit along with the annexures and the same is true and correct and is drafted on my instruction.

VERIFICATION

Verified on this 04 MAY 2024 of 2023 at (Place) Bhubaneswar that the contents of the above affidavit are true and correct. No part of it is false and nothing material has been concealed there from.

Identified By Apeshy Advocate

Haripada Manna DEPONENT



The above named deponent(s) being duly identified by Sri. Apeshy Advocate, Bhubaneswar. Appears before me on 04 MAY 2024 at Bhubaneswar, Odisha on oath that the contents of the affidavit are true to the best of their knowledge and belief.

Deponent(s) Notary, Bhubaneswar

JANME JAYA RAUTRAY, NOTARY PUBLIC OF ODISHA, BHUBANESWAR, REGD. NO-ON-86/2012, Mob. No. - 9337121273

Tel.: 06782-244110
Website: www.ospcboard.org
E-mail: rospcb.balasore@ospcboard.org



REGIONAL OFFICE, BALASORE
STATE POLLUTION CONTROL BOARD, ODISHA
(FOREST, ENVIRONMENT & CLIMATE CHANGE DEPTT, GOVT. OF ODISHA)
Plot No.1602, Ganeswarpur, Balasore – 756019

No 3580 / RTI / 70 / 2016 (P-III)

Dt 24/11/2023

From
Sri P.K. Rout
Asst. Env. Scientist & PIO

By Regd Post

To
Khakan Jena
S/o – Bibhuti Jena
At :- Sekhsarai
Po:- Chalanti
P.S - Jaleswar
Dist:-Balasore
Pin :- 756086

Sub - Information under RTI Act, 2005 – Reg.

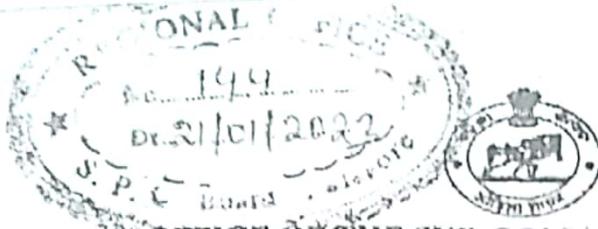
Ref - Your RTI application received by the PIO, Balasore on 26.10.2023 under RTI Act,2005.

Sir,

With reference to the above this is to intimate that the information sought by you is related to preparation of District Survey Report (D.S.R) in respect of Balasore Sadar Sub-Division for inclusion and exclusion of Sairat sources in Balasore district which is available at office of the Regional Office of the Board at Balasore.

Yours faithfully


24-11-2023
Asst. Env. Scientist and PIO



OFFICE OF THE SUB-COLLECTOR, BALASORE
 E mail: subcollector_balasore@yahoo.in Phone: 06782-262052
 (TOUZI SECTION)

No. 08(S) /Dated 21/01/2023

To

The Regional Officer,
 State Pollution Control Board, Balasore/
 The S.D.O. Irrigation Balasore/
 The S.D.O. Irrigation, Jaleswar/
 The Range Officer (Wild Life) Division, Balasore/
 The Mining Officer, Baripada.

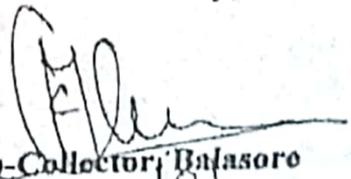
Sub: Holding of joint meeting for preparation of District Survey Report (D.S.R).

Sir,

In inviting a kind reference to the letter on the above cited subject, I am to inform you that the Sub-Divisional Meeting on District Survey Report in respect of BalasoreSadar Sub-Division is scheduled to be held on 24.01.2023 at 11.00 A.M. in the office chamber of the undersigned for inclusion and exclusion of Sairat Sources.

Hence, it is therefore requested to make it convenient to attend the meeting on the said date, time & venue fixed.

Yours faithfully,


 Sub-Collector, Balasore
 20/1/23

420
21/01/2023

A. Prasad
 21/01/2023

Copy Supplied
 Under Right to Information Act 2005
 No. 28 dated 26.10.2023


 S.P.C. Board Officer

Tel.: 06782-244110

Website: www.ospcboard.orgE-mail: rospcb.balasore@ospcboard.org

REGIONAL OFFICE, BALASORE
STATE POLLUTION CONTROL BOARD, ODISHA
(FOREST, ENVIRONMENT & CLIMATE CHANGE DEPTT, GOVT. OF ODISHA)
Plot No.1602, Ganeswarpur, Balasore – 756019

No 979 / RTI / 70 / 2016 (P-II)Dt 11/03/2024

From
Sri P.K. Rout
Asst. Env. Scientist & PIO

By Regd Post

To

Haripada Manna
S/o – Late Paresh Chandra Manna
At :- Sekhsarai
Po :- Chalanti
PS - Jaleswar
Dist:-Balasore
Pin :- 756082

Sub - Information under RTI Act, 2005 – Reg.

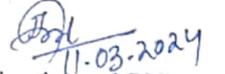
Ref - Your RTI application received by the PIO, Balasore on 08.02.2024 under RTI Act 2005.

Sir,

With reference to the above this is to intimate that the information sought by you is related to tour diary of Regional Officer, SPC Board, Balasore from 16.01.2023 to 20.01.2023 which is available at office of the Regional Office of the Board at Balasore.

Encl: As above

Yours faithfully


11.03.2024
Asst.Env.Scientist and PIO



REGIONAL OFFICE, BALASORE
STATE POLLUTION CONTROL BOARD, ODISHA
 (FOREST, ENVIRONMENT & CLIMATE CHANGE DEPARTMENT, GOVT. OF ODISHA)
 Plot No. 1602, Ganeswarpur, Balasore – 756019

No. 347 / Estt/337/2022-23

Date 04/02/2023

**TOUR PROGRAMME OF REGIONAL OFFICER
 SPC BOARD, ODISHA, BALASORE FOR THE MONTH OF JANUARY 2023**

Date	Purpose of Journey	Accompanying Staff / Official	Mode of Journey
09.01.2023	Inspected I. M/s Modern Polypack Industries, I/E, Balasore, Balasore (Other) II. M/s Sri Durga Condev Stone Crusher Unit, At- Khanjamahal, Bagudi, Soro, Balasore (CTO) III. M/s Suguna Foods Pvt. Ltd., At- Somanathpur, I/E, Remuna, Balasore (CTO) & back to headquarter.	Sri B C Marndi, DES	Hired Vehicle
13.01.2023	Inspected I. M/s Everest Industries Ltd., At- Somnathpur I/E, Balasore (CTO) & back to headquarter.	Er A K Barik, DEE & Sri S K Swain, JSA	Hired Vehicle
18.01.2023	Inspected I. M/s Dhamra Port Company Ltd., Dasinga, Dhamra, Bhadrak (CTO) & back to headquarter	Sri S K Swain, JSA	Hired Vehicle
21.01.2023	Inspected I. M/s B.B Poultry Farm, At/PO- Jharpokharia, Mayurbhanj (CTO) II. M/s Associate Minerals At- Ramchandrapur, PO- Dhangdisole, Baripada, Mayurbhanj (CTE) & back to headquarter		Hired Vehicle
25.01.2023	Inspected I. M/s Falcon Marine Exports Ltd., At- Nuapada & Oliapatna, PO- Khantapada, Balasore (HWM) II. M/s Dimod Agro Vet, At- Nakichua, PO- Rasgobindapur, Mayurbhanj (CTE)	Er. A K Barik, DEE	Public Transport

	<p>III. M/s Jambhira River Sand Bed Stretch No.5, At- Gandaguhai & Pariakuli, Moroda, Mayurbhanj (CTO)</p> <p>IV. M/s Jambhira River Sand Bed Stretch No.2, At- Baunshakantia, Gadia & Kendudiha, Moroda, Mayurbhanj (CTO)</p> <p>V. M/s Janakpur (Bajarpur) River Sand Bed At- Janakpur (Bajarpur), Kaptipada, Mayurbhanj (CTO)</p> <p>VI. M/s SKM Infra.Venture Pvt. Ltd., At/PO- Ukam, Hatbadra, Badampahar, Mayurbhanj (CTO) & back to headquarter</p> <p>Attended the NCAP Monitoring Committee Meeting at RO, Office Chamber VC mode</p>		
30.01.2023	<p>Inspected</p> <p>I. M/s Baba Akhandalamani Concreto, At- Randia, Sarmanga, Bhadrak (CTO) & back to headquarter.</p>		Hired Vehicle
31.01.2023	<p>Inspected</p> <p>I. M/s GM Iron Steel & Company Ltd., (Badampahar Iron Ore Block), Badampahar, Mayurbhanj (PC)</p> <p>II. M/s Lalit Patho Clinic, At/PO- Jasipur, Mayurbhanj (BMW) & back to headquarter</p> <p>Attended the DLC Meeting at Office Chamber, GM, DIC, Mayurbhanj</p>	Sri S K Swain, JSA	Hired Vehicle

Submitted:


 04/02/2023
 (Er. M. Murmu)
 Regional Officer

Approved:

Chief Env. Engineer

Copy Supplied
 Under Right to Information Act 2005
 vide Application No. 35 dt. 02-02-2024


 Public Information Officer,
 S.P.C. Board, Balasore

OFFICE OF THE ASSISTANT EXECUTIVE ENGINEER
JALESWAR IRRIGATION SUB-DIVISION, JALESWAR

No. 1663.....

Dt. 12/1/23

To

Sri Haripada manna
S/O- Paresh Chandra manna
AT- Seksorai
P.O-Chalanti
P.S-Jaleswar
DIS- BALASORE-756086

Sub: Regarding R.T.I APPLICATION on of sri Haripada manna on
dt.07/02/2024.

Ref: corrected RTI on 13/03/2023

Sir.

Please refer to your application date 07/02/2024 addressed to the AEE, Jaleswar irrigation sub-division. Tour diary report of SDO irrigation from 16/01/2023 to 20/01/2023 is enclosed (2 pages).

Yours faithfully,


Assistant Executive Engineer
Jaleswar Irrigation Sub- Division,

for the month of 1/23

① Date	② Reading	③ Time	④ Reading	⑤ Time	⑥ Run	⑦ description of journey.	⑧ purpose of journey.	⑨	⑩	⑪	⑫	⑬	⑭	⑮	⑯	⑰	⑱	⑲	⑳
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16.1.23		8am		3pm	70km	Talwar to Badli gram, Phog look 85000													
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do

①	②	③	④	⑤	⑥	⑦
17.1.23		8am		3pm	180km	Talera to Kanakote, Phusandem Phogamtan back Sir
19.1.23.		8am		5pm	180km	Talera to Phusandem, Phogam mahan, Kanakote, back.
21.1.23		8am		3pm	60km	Talera to Phogam back & back.

Supervisor of work P.E. Kanakote.

Sub

30km.

HSD balance in this tank in this month = 111
 HSD supplied during in this month = 130 Ltr.
 HSD Balance in this tank in this month = 111
 1150 Consumed during this month = 130 Ltr.
 70 Ltr in Rain during this month = 130 Ltr
 Hence km Run during this month = 130 / 18 Ltr

17.1.23
 11



Sankar Pani <sankarprasadpani@gmail.com>

REJOINDER AFFIDAVIT IN APPEAL 18/2023 EZ

1 message

Sankar Pani <sankarprasadpani@gmail.com>

Mon, May 6, 2024 at 2:00 PM

To: Tarun Patnaik <tarun.patnaik87@gmail.com>, apurba ghosh <apu7law@gmail.com>

DEAR SIR PLEASE FIND THE ATTACHMENT.

--

Sankar Prasad Pani, Environment Lawyer
National Green Tribunal Kolkata & Orissa Highcourt
Res-Plot No 2132/4814(B), Nageswar Tangi,
Bhubaneswar, 751002
Cell- 9437279278
Skype- sankar.pani

 **REJOINDER HARIPADA.pdf**
2193K