

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE, CHENNAI**

**Original Application No.175 of 2020 (SZ)**

Venkatapathi Raja Yenumula  
H.No. 2-232, Kesavadasupalem  
RAZOLU Taluka,  
Sakhinetipalli Mandal  
East Godavari, Andhra Pradesh – 533 252  
Mobile: 9528345678; +44 7837 200953  
Email: [rajavr.smile@gmail.com](mailto:rajavr.smile@gmail.com)

.....Applicant

Vs.

1. Union of India  
Through its Secretary  
Ministry of Environment, Forest & CC  
Indira Paryavaran Bhavan,  
Jorbagh, New Delhi-110003  
E-mail: [secy-moef@nic.in](mailto:secy-moef@nic.in)  
Phone: 011- 24695262, 24695265

2. Union of India  
Represented by its Secretary  
Ministry of Petroleum & Natural Gas  
Shastri Bhavan, New Delhi-110001  
E-mail: [sec.png@nic.in](mailto:sec.png@nic.in),  
Phone: 011-23383501/23383562

3. Oil and Natural Gas Corporation Ltd.  
Represented by its Chairman  
Deendayal Upadhyaya Urja Bhavan,  
5, Nelson Mandela Marg,  
Vasant Kunj, New Delhi-110070  
E-mail: [ongcdelhicc@ongc.co.in](mailto:ongcdelhicc@ongc.co.in)  
Phone: 011-26752021, 26122148

4. GAIL (India) Limited  
GAIL Bhavan, Door No. 72-2-14A,  
AV Appa Rao Road,  
Rajahmundry – 533 103

Through its:  
Deputy General Manager (Law)  
Mr. A.Venkatesan  
Having office at Chennai Zonal Office  
5<sup>th</sup> floor, “Kuppu Arcade”  
New No. 4 Old No. 60, Venkatanarayana Road,  
T.Nagar, Chennai – 600 017.

5. State of Andhra Pradesh  
Represented by its Chief Secretary  
Secretariat, Velagapudi,  
Guntur, Andhra Pradesh-522503  
E-mail: [cs@ap.gov.in](mailto:cs@ap.gov.in),  
Phone: 08632444461

6. Central Pollution Control Board  
Through Member Secretary  
Parivesh Bhawan, CBD-cum office  
Complex, East Arjun Nagar, Delhi-110032  
E-mail: [mascb@cpcb.nic.in](mailto:mascb@cpcb.nic.in),

Phone: 22307078

7. Andhra Pradesh Pollution Control Board  
Represented by its Member Secretary  
D.No. 33-26-14/D2, Pushpa Hotel Center  
Chalamvari Street, Kasturibaipet  
Vijayawada, Andhra Pradesh-520010  
E-mail: [membersecy@appcb.gov.in](mailto:membersecy@appcb.gov.in)  
Phone: 08662463202

8. Director General Fire Services  
Office of the Director General, State  
Disaster Response & Fire Services  
Department, Near Police Control Room,  
Governorpet Vijayawada,  
Andhra Pradesh-534006  
E-mail: [peshi\\_apfire@yahoo.com](mailto:peshi_apfire@yahoo.com),  
Ph: 0866-2570101

9. Andhra Pradesh Police Department  
Represented by its DIG of Police  
Eluru Range, Eluru,  
Andhra Pradesh-522501  
Phone : 9490618572,  
E-mail: [dgp@appolice.gov.in](mailto:dgp@appolice.gov.in)

10. District Collector and Magistrate  
East Godavari at Kakinada  
Andhra Pradesh-533001  
E-mail: [collector\\_egd@ap.gov.in](mailto:collector_egd@ap.gov.in)  
Phone: 0884-2365424

11. District Collector and Magistrate  
West Godavari District  
Ameenapeta, Eluru,  
Andhra Pradesh-534006  
E-mail: [collectorwgg@gmail.com](mailto:collectorwgg@gmail.com)

12. Andhra Pradesh Coastal Zone  
Management Authority  
Represented by its Chairman  
Chalamvari Street, Kasturibaipeta  
Vijayawada-520010  
E-mail: [apczma2016@gmail.com](mailto:apczma2016@gmail.com)  
Phone: 0866-2463200

.....Respondents

**OBJECTIONS FILED BY THE 4<sup>TH</sup> RESPONDENT TO THE JOINT  
COMMITTEE REPORT DATED 09.04.2021**

The 4<sup>th</sup> Respondent respectfully submits as follows:

The address for service of the Respondent No.4 is M/s. A.Muraleedharun,  
Shanthi.A having office at No. 13/6, Judge Jambulingam Street, Mylapore,  
Chennai - 600 004 Ct: 7010924131.

1. The above application has been filed by the Applicant alleging that Air, Sound, Soil and Water pollution is caused on account of the activities of this Respondent and M/s. ONGC units in the State of Andhra Pradesh along the Krishna-Godavari Basin located in East and West Godavari Districts of A.P. by way of oil leakage caused in the pipelines which again causes damages to the agricultural land and water bodies. The Applicant also made allegations against this Respondent and M/s. ONGC that the pollution control mechanism are not followed and the pipelines are not properly maintained. Hence on 08.09.2020 this Hon'ble Tribunal was pleased to pass the following order:

*"In order to ascertain the impact of the activities of the Respondent 3 & 4 in the area in question namely Krishna Godavari bed in East Godavari and West Godavari District, we feel it appropriate to appoint a Joint Committee comprising of 1) a Senior Office from Regional Office, Ministry of Environment & Climate Change (MoEF&CC), Chennai, 2) a Senior Officer from Regional Office, Central Pollution Control Board (CPCB), Chennai, 3) a Senior Officer as deputed by the Chairman of the Andhra Pradesh Pollution Control Board (APPCB), 4) the District Collectors and 5) an Expert on Petroleum Engineering from Andhra University College of Engineering, Visakhapatnam to inspect the area in question and submit a factual as well as action taken report, if there is any violation found."*

-and thereby has appointed a Joint Committee to inspect the areas in question.

2. The 4<sup>th</sup> Respondent has laid underground pipelines as per the National Standards like PNGRB T4S Regulations & OISD-226 standards and International Standards ASME. Hence, these Pipelines are safe & reliable and environment friendly. In the 4<sup>th</sup> Respondent's operations in KG Basin, there is no manufacturing process and there are no compressors for gas compression. The gas is being transported at the same pressure at which it is being received from the suppliers like M/s ONGC, M/s PIL, M/s Vedanta (CEIL). Sometimes, the pressure is further reduced as per the requirements of downstream consumers.

3. In the same manner, the 4<sup>th</sup> Respondent is also not using water for any operation or activity except for domestic purpose as few employees are posted at gas dispatch & receiving terminals. Hence, there is no generation or discharging of wastewater or air pollution from the 4<sup>th</sup> Respondent's operating units. However, as per statutory requirements, the 4<sup>th</sup> Respondent has obtained Air, Water & Hazardous waste consents from APPCB for all the Pipelines operating in KG Basin and also complying all the conditions mentioned in the Consent Orders.

4. In compliance with CFO conditions, the 4<sup>th</sup> Respondent has always initiated proactive measures to protect the environment and to provide pollution free atmosphere in and around GAIL's operations. Ambient Air Quality Monitoring jobs are been conducted monthly by engaging Third Party Agencies having authorisation from CPCB/APPCB. Noise monitoring is also carried out regularly and the results are very well within the limits prescribed by the APPCB. The 4<sup>th</sup> Respondent's KG Basin has obtained ISO/IMS certification from well-qualified Certification bodies.

5. In the part of Hazardous Waste authorisation as per HWM Rules, the 4<sup>th</sup> Respondent has obtained consent from APPCB. After the installation of GDUs at gas source points by M/s ONGC, dry gas is being received in the trunk lines. As a result, there is very little hazardous waste like iron dust, condensate sludge etc., collected from the pipelines during the pigging of various pipeline sections. However, the 4<sup>th</sup> Respondent has signed an agreement with M/s Ramky Enviro Engineers Ltd, Visakhapatnam (Authorised TSDF Agency in AP by APPCB) for proper and safe disposal of hazardous wastes in case of any requirements. The 4<sup>th</sup> Respondent has also taken number of initiatives to protect the environment in addition to the conditions stipulated in the CFOs like tree plantations, rain water harvesting measures, conducting awareness programs on safe environment at the villages & schools.

6. Natural Gas is the cleanest fuel and pipeline transportation is the preferred mode of transport of natural gas over long distances. Govt. of India as well as the State Governments are encouraging the development of pipeline infrastructure and gas based economy, so as to supply natural gas for domestic purpose as PNG, for Vehicles as CNG as well as to Large & Small scale industrial units in various sectors likes Fertilizer, Power, Ceramics, Glass etc., for their use. To achieve the goals prescribed by the Government in the interest of public welfare and safety, the 4<sup>th</sup> Respondent is contributing its best for sustainable development by transporting this clean fuel safely without damaging our flora & fauna.

The 4<sup>th</sup> Respondent states that they have engaged one M/s. Ramky Enviro Engineers Limited for disposing the hazardous waste from GAIL KG Basin Installations from February, 2018 on a regular 2 years contract basis and the said entity has been complying with their duty from time to time. The 4<sup>th</sup> Respondent submits that in view of the COVID-19 pandemic and lockdown, the entity was unable to perform the duty i.e. disposing he hazardous waste on a regular basis.

8. The Committee has also noted in para 4.c (page 28 of report dated 9.04.2021) that *"In KG Basin M/s GAIL is not involved in the extraction of gas from the wells and is having only gas terminals where dry gas is received from ONGC terminals."*

It is therefore prayed that this Hon'ble Tribunal may be pleased to dismiss the above Application with costs and to pass such further or other orders as may be deemed fit and thus render justice.

Dated at Chennai this the ~~14~~<sup>14<sup>th</sup></sup> day of July, 2021.



Counsel for Respondent No.4

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE, CHENNAI**

**Original Application No.175 of 2020 (SZ)**

Venkatapathi Raja Yenumula  
H.No. 2-232, Kesavadasupalem  
RAZOLU Taluka,  
Sakhinetipalli Mandal  
East Godavari, Andhra Pradesh – 533 252  
Mobile: 9528345678; +44 7837 200953  
Email: [rajavr.smile@gmail.com](mailto:rajavr.smile@gmail.com)

.....Applicant

Vs.

1. Union of India  
Through its Secretary  
Ministry of Environment, Forest & CC  
Indira Paryavaran Bhavan,  
Jorbagh, New Delhi-110003  
E-mail: [secy-moef@nic.in](mailto:secy-moef@nic.in)  
Phone: 011- 24695262, 24695265 & 11 others

.....Respondents

**AFFIDAVIT**

I, Korrapati Venkata Sitarama Rao son of Dr K.V Lakshminarayana aged 53 years working as Chief General Manager, GAIL (India) Limited, AVA Road, Rajahmundry do hereby state on solemn affirmation as follows:

1. I state that I am the Chief General Manager of the 4<sup>th</sup> Respondent, GAIL (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 4<sup>th</sup> respondent and I am authorized to swear to the same.
2. I further state that the statements made in para 01 to 08 of the accompanying written objections are true to the best of my knowledge, belief and information.
3. I state that what is stated above are true and correct.

**VERIFICATION**

I, Korrapati Venkata Sitarama Rao the deponent above named do verify and state the statements made in para 01 to 08 of this affidavit are true and correct and I swear to the same.

Place: Rajahmundry

Dated: 14.07.2021

Solemnly affirm and Signed/  
Affixed mark before me at  
RAJAHMUNDRY on 14.7.2021

Deponent

के.वी.एस.राव / K.V.S. RAO  
मानव संसाधन प्रमुख / CHIEF GENERAL MANAGER (CMG/CC)  
गैल (इंडिया) लिमिटेड / GAIL (India) Limited  
ए.वी.अपारो रोड  
राजहमंड्री (आंध्रप्रदेश) / RAJAHMUNDRY - 533 103, (A.P.)

**R. RAMA MURTHY**  
Advocate & Notary  
Door No: 47-1-8/9, Pavan Heights, S1,  
Danavaipeta,  
RAJAHMUNDRY-533 103.

14 JUL 2021

Certificate of Practice renewed  
upto 25-06-2023 as per  
G.O.Regdn. No: 6185

