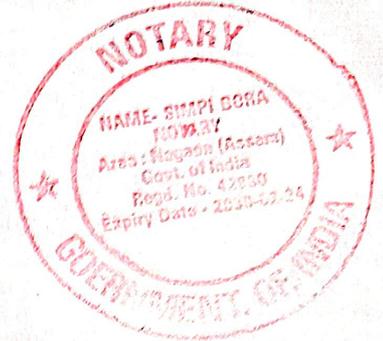


**BEFORE THE NATIONAL GREEN TRIBUNAL,
EASTERN ZONE BENCH, KOLKATA**

I.A.77 of 2025/EZ
in
Original Application No.86 of 2024/EZ



In the Matter of:
Pradeep Singh Sekhawat
- vs -
Union of India and Ors.

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✓
Kadam Suhas Terrachand

Filed by:

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E-mail: mrdey@rediffmail.com
Mobile: 9051634204

[Signature]
Notary
Govt. of India
Area: Nagaon (Assam)

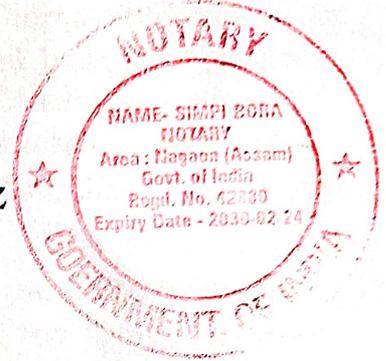
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**BEFORE THE NATIONAL GREEN TRIBUNAL,
EASTERN ZONE BENCH, KOLKATA**

I.A.77 of 2025/EZ

in

Original Application No.86 of 2024/EZ



In the Matter of:

Pradeep Singh Sekhawat

- vs -

Union of India and Ors.

Affidavit in Reply on behalf of the Respondent No.2, The State of Assam

I Sri Kadam Suhas Tarachand, son of Kadam Tarachand Gabaji, aged about 39 years, by faith-Hindu, by occupation-service, residing at:-Nagaon, do hereby solemnly affirm and state as follows: -

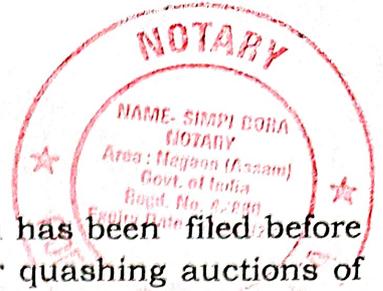
1. That I am the Divisional Forest Officer, Nagaon District, Assam, Department of Environment and Forest, Government of Assam and as such I am fully conversant with the facts and circumstances of the case.
2. That I have received the copy of the above-mentioned Original Application, and the Interlocutory Application, as well as the relevant orders, of the National Green Tribunal, Eastern Zone Bench, connected to the said case, have gone through the same and understood the contents made therein.

[Signature]
Notary
Govt. of India
Area : Nagaon (Assam)

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Kadam Suhas Tarachand

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3. That in the instant the instant Original application has been filed before the Hon'ble Tribunal seeking directions, inter-alia, for quashing auctions of minor minerals which are being conducted in the 8 districts of Assam, viz., Cachar, Tinsukia, Udalguri, Goalpara, Golaghat, Kamrup (Metro), Lakhimpur and Nagaon in the absence of District Survey Report (hereinafter called as DSR). And the instant I.A. 77/2025/EZ, has been filed before the Hon'ble Tribunal seeking directions, inter-alia, for quashing notices of auctions of minor minerals dated 16.07. 2025, which are being conducted in the District of Morigaon, on the ground of non-approval of the District Survey Report(DSR).

In this connection, it is pertinent to mention that the DSR of Morigaon district has been finally approved on 13.02.2025, and the finally approved DSR has also been uploaded in the Public domain. These facts have already been stated before the Hon'ble Court through the affidavit dated 29.08.2025.

4. In this connection, the Answering Respondent further begs to state that a mega project, with investment of RS. 27000 Crore, i.e. "Tata Semi Conductor Project" is being set up in Jagiroad in Morigaon District. It is pertinent to mention that the project involves Public Interest and of National importance and for such project, there is no Minor Mineral resources in Morigaon and also in neighbouring districts.

Be it also mentioned that, there are other projects of immense state / National importance and Public Interest, such as *Guwahati Ring Road Projects, 2-laning alongwith bridge over Bramhaputra river from Morigaon to Rowta alongwith in Morigaon district, Elevated Corridor project (~31 km in length in 3 segments) near Kaziranga National Park (being so far the biggest animal friendly passage project in the country)* and including many other highway road projects. Therefore, kind attention of Hon'ble Tribunal is drawn to fact that there is very acute shortage of critical minerals in and around Morigaon for which the Stone Mineral Concession Area, No F6, measuring 20 Ha, is most crucial for provisioning of stone in the shortest possible time. As such the State as well as the Nation will suffer if such on going projects are stalled.

5. That the Answering deponent further begs to submit that the Respondent authorities has complied all the required formalities fully pursuant to the order of the Hon'ble Tribunal Dt. 23/07/2024 in the I.A. No.32/2024/EZ in the Original Application No.86/2024/EZ. Further in pursuance of the order of the

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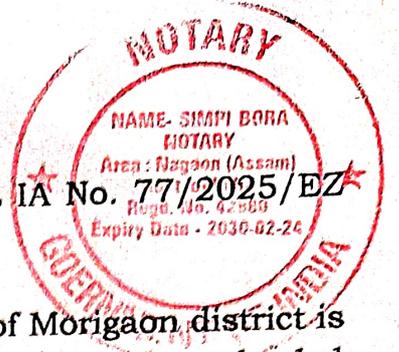
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Govt. of India
Area: Morigaon (Assam)

Kadam Subhas Tarachand

Hon'ble Tribunal dtd. 6/10/2025 in IA No. 86/2024/EZ & IA No. 77/2025/EZ
in OA No. 86/2024/EZ.



6. Be it mentioned that now the finally approved DSR of Morigaon district is in the public domain. Although the annexures of the DSR could not be uploaded initially due to technical issues, the Answering Respondent uploaded Volume II of DSR on 10/10/2025. It is further pertinent to mention that Volume II is not main document but Annexures and mostly include Govt Notifications / Hon'ble Court Guidelines which are already published and readily available on website of respective publishing offices. Needless to mention that, the Answering Respondent was quite proactive in pursuing the matter with technical team of the website in order to achieve the complete upload of DSR document. The delay in uploading Volume II part of DSR was mostly due to technical error i.e. upgrading of District Website Platform and it is humbly prayed before Hon'ble Court to kindly excuse it.

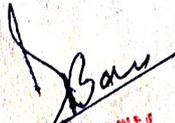
Kadam Sulhas Tarachand

In this connection, it is also submitted before this Hon'ble Court that MOEF Rules and Guidelines regarding DSR, has laid an emphasis of uploading the draft DSR in the public domain, for receiving public opinions, before the said DSR is finally approved. But the said Rules and Guidelines are totally silent about uploading the finally approved DSRs in the public domain. Further, EMGSM 2020 guideline mentions the publication of Comprehensive Mining Plan in district website but not the DSR and said guideline is specifically for Sand Mining Only as clearly mentioned in said section. Needless to mention that, the finally approved DSRs are also uploaded in the website, and all the formalities regarding the finally approved DSR are complied with.

7. At this point of time, all the orders of Hon'ble Tribunal are complied with by the Answering Respondent. In view of fact that the matter of settlement of the Mineral Concession Area before kind consideration of the Hon'ble Tribunal, i.e. the Jagiroad Stone Mining Area No F6 has been delayed considerably, the Answering Respondent begs to pray that in interest of expeditious justice and in interest of urgent public service, the matter may be decided on immediate basis by the Hon'ble Tribunal.

8. That under the above-stated circumstances, the Answering Respondent humbly begs before the Hon'ble Tribunal to allow the immediate resumption of the ongoing tender process of Mineral Concession Area, Jagiroad Stone Mining Area No F6 so that critical mineral resources may be provisioned for several key

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infrastructure project in and around of Morigaon and neighbouring districts, including the prestigious Tata Semiconductor Project.

9. The Answering Respondent also humbly prays before the Hon'ble Tribunal to dismiss the instant IA77/2025/EZ with heavy costs which is filled with misleading information, which also compels us to have an idea that the instant Applicant, who originally hails from Rajasthan, has no other interest but the sole interest to meddle in the affairs of the State of Assam and of hampering availability of critical mineral resources to infrastructure projects in the State.

10. That the statements made out in the foregoing paragraphs are true to the best of my knowledge and belief and based on records and the same are also my respectful submissions before this Hon'ble Court and that I have not suppressed any material facts.

✓ Kadam Suhans Tarachand

Deponent



Kadam Suhans Tarachand

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28/10/25-

[Signature]
Notary
Govt. of India
Area : Nagaon (Assam)