

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

ORIGINAL APPLICATION NO. 582 OF 2024

IN THE MATTER OF:

RAKESH KUMAR

...APPLICANT

VERSUS

UNION OF INDIA & ORS.

....RESPONDENTS

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3. Proof of service
FILED AT: NEW DELHI

10

DATED: 22.12.2025

Respondent No. 35

Through:



Mr. Ashish Rohlania and Mr. Fahad Imtiaz
Counsel for the Respondent No. 35

AF PARTNERS

Advocates & Legal Consultants

119, Lawyer's Chamber Block,

Saket District Court, New Delhi

Mob. No. 9643196995, 9634399361

Email: fahadimtiaz11@gmail.com

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
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AFFIDAVIT

I, Gaurav Garg S/o Shri Mukesh Garg R/o House No. 252, Model Town, Hisar, Haryana 125001, Authorized Representative of M/s Sunrise Woods Industries (Respondent No. 35) situated at VPO Kohli, Agroha Adampur, Hisar, Haryana do hereby solemnly affirm and declare as under: -

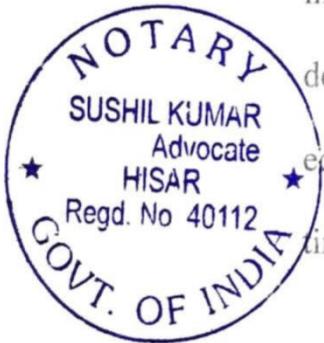
1. I state that this affidavit is being filed to place on record the correct factual and regulatory position regarding the availability and feasibility of Piped Natural Gas (PNG) infrastructure in Hisar District and to controvert the incorrect submissions made before this Hon'ble Tribunal regarding alleged 100% PNG coverage.

M/s Sunrise Woods Industries

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Partner

2. I state that Haryana City Gas / HCG (KCE) Private Limited has been authorized for development of a City Gas Distribution (CGD) network in Hisar District; however, such authorization is accompanied by a phased **Minimum Work Programme extending up to March 2030** and does not signify present operational readiness or universal PNG availability. While HCG claims to be expanding its network, the actual ground reality is that PNG infrastructure in Hisar, particularly for industrial and commercial consumers, is still at an incipient and developmental stage. Expansion plans or future projections cannot be equated with existing availability, especially when the regulatory timeline itself extends several years into the future.



3. I further state that transitioning to PNG, though environmentally desirable, imposes a substantial financial and operational burden on small and medium-scale industries like the answering respondents, which operate on limited margins. Switching to PNG requires significant capital expenditure towards modification or replacement of existing furnaces and machinery, installation of internal pipelines,

M/s Sunrise Woods Industries

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Partner

safety systems, metering arrangements, and regulatory compliances. In the absence of assured and proximate PNG connectivity, compelling such industries to switch over results in serious financial stress, operational uncertainty, and potential closure, thereby causing irreparable loss.

4. I state that on **14.08.2024**, the Learned Counsel for the respondents submitted before this Hon'ble Tribunal that there is no shortage of PNG supply in the concerned area and that there is 100% PNG coverage, making it easy for industrial units to switch over to PNG. I respectfully submit that the said statement is false, misleading, and unsupported by any official document, field report, or statutory record, and does not reflect the actual status of PNG infrastructure in Hisar.

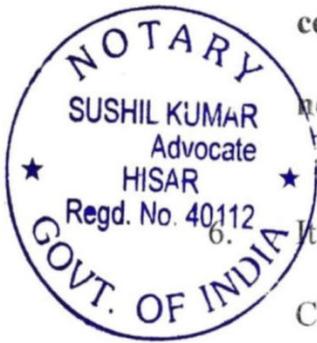
5. In order to ascertain the true factual position, the answering respondent filed an application under the Right to Information Act, 2005, which was replied to by the Petroleum and Natural Gas Regulatory Board (PNGRB) vide Reply Letter No. **PNGRB/ Monitoring/ 8/ RTI(1)/ 2025/ 2132 dated 17.06.2025**. In the said reply, PNGRB categorically



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Partner

stated that Hisar District Geographical Area has been authorized to HCG (KCE) Private Limited for development of a CGD network with a Minimum Work Programme target of 2,51,370 domestic PNG connections, 46 CNG stations, and 1,991 inch-kilometers of pipeline to be established by March 2030. **The said reply itself establishes that the CGD network is proposed and incomplete and that full coverage is only contemplated in the future, thereby completely negating the claim of 100% PNG coverage at present.**



It was further informed under the RTI reply that as on date, the nearest CNG pump to Kholi Village, Adampur, Hisar is M/s Bharat Filling Station situated at Village Karbel, which is approximately 14 kilometers away, and that HCG may plan to establish additional CNG stations in the future subject to demand. **The use of the expression "may plan" clearly demonstrates uncertainty and absence of present adequacy of PNG/CNG infrastructure in the concerned area.**

M/s Sunrise Woods Industries

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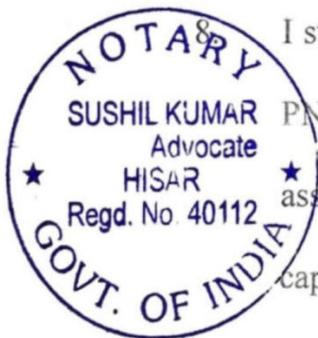
Partner

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SUSHIL KUMAR
Advocate
HISAR
Regd. No.

GOVT. OF

7. I further state that specific queries were raised regarding availability of industrial and commercial PNG stations and pipeline connectivity, however, the said queries were responded to in a vague and evasive manner without furnishing any concrete details, pipeline maps, or operational data, which clearly indicates that there is no existing industrial or commercial PNG pipeline coverage in Hisar as on date. Had such infrastructure been in place, the same would have been readily disclosed by the statutory authority.



I state that compelling small and medium industries to switch over to PNG in the absence of proper infrastructure, pipeline connectivity, and assured supply would cause irreparable financial loss, unjustified capital expenditure, disruption of production, and loss of livelihood.

Regulatory mandates must be implemented in a manner consistent with ground realities, infrastructure readiness, and economic feasibility, and environmental objectives cannot be enforced in isolation without considering these critical factors.

M/s Sunrise Woods Industries

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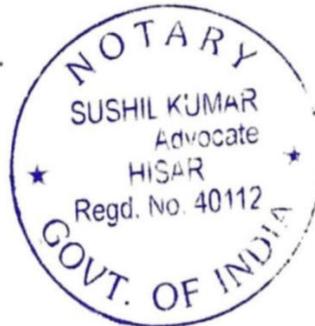
Partner

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9. I state that the claim of 100% PNG coverage made before this Hon'ble Tribunal is demonstrably false and stands contradicted by statutory records, official RTI replies, and physical infrastructure realities.
10. The contents of this affidavit are true and correct to the best of my knowledge and belief, based on official records and factual information, and nothing material has been concealed therefrom. I say that the documents annexed along with the affidavit are the true copies of their originals.

M/s Sunrise Woods Industries


Partner
DEPONENT



VERIFICATION

I, the above-named deponent, do hereby verify on solemn affirmation that the contents of Para No.1 to 10 of this affidavit are true and correct as per my knowledge, no part of it is false and nothing material has been concealed therefrom.

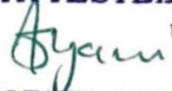
Verified at _____ on this _____ day of December 2025.

M/s Sunrise Woods Industries


Partner

DEPONENT

ATTESTED


NOTARY, HISAR
22/12/2025



पेट्रोलियम एवं 820 क गैस विनियामक बोर्ड

ANNEXURE- R-35/A

Petroleum and Natural Gas Regulatory Board

ई-400, चतुर्थ तल, डब्ल्यूटीसी, नौरोजी नगर, नई दिल्ली – 110029

E-400, 4th Floor, WTC, Nauroji Nagar, New Delhi – 110029

ई-मेल /E-mail: contact@pngrb.gov.in

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PNGRB/Monitoring/8/RTI/(1)/2025/2132

17th June, 2025

To

श्री आदित्य गर्ग

Shri Aditya Garg

मकान सं. 252, मॉडल टाउन,

H. No. 252, Model Town,

जेपी गैस एजेंसी के पास, हिसार, हरियाणा – 125 001

Near JP Gas Agency, Hisar, Haryana – 125 001

Subject: Application under the RTI Act, 2005

Sir,

This is with reference to your online application regarding Registration No. PNGRB/R/P/25/00011 dated 22nd May 2025, under the RTI Act, 2005. The following is submitted: -

Reply to RTI (point 1 to 12). Inputs were sought from HCG (KCE) Private Limited on your RTI Query. The response received is attached for your information.

Further, with respect to point 2 (c). It is to inform you that, PNGRB has authorized Hisar District Geographical Area (GA) to HCG (KCE) Private Limited for development of City Gas Distribution (CGD) Network along with the Minimum Work Programme (MWP) Target of 2,51,370 Domestic PNG Connections, 46 CNG Stations and 1,991 Inch-km of pipeline to be established by March 2030.

2. Further, in case you opt for an appeal in connection with the information provided, you may appeal to the Appellate Authority indicated below within **thirty days** from the date of receipt of this letter: -

Lt Col Kumar Abhishek

FAA & Director (Monitoring), Petroleum and Natural Gas Regulatory Board,

E-400, 4th Floor, Tower – E, World Trade Centre,

Nauroji Nagar, New Delhi – 110 029

भवदीय/ Yours faithfully,

(मनीष कुमार)

(Manish Kumar)

सहायक निदेशक (निगरानी) एवं के.ज.सू.अ
Assistant Director (Monitoring) & CPIO

Re: आरटीआई अधिनियम, 2005 के तहत आवेदन - श्री आदित्य गर्ग

Mohit Budhiraja <mohit.budhiraja@hcggroup.co.in >

Thu, 05 Jun 2025 3:24:28 PM +0530

To "Monitoring Division PNGRB"<e-monitoring@pngrb.gov.in>,"Kumar Abhishek" <kabhishek@pngrb.gov.in>,"Nilesh Yadav"<nilesh.yadav@pngrb.gov.in>

Cc "rahul chopra"<rahulchopra1232@gmail.com>,"Ajay Mishra" <ajay.mishra@hcggroup.co.in>,"Rohit Verma"<rohit.verma@hcggroup.co.in>

Sir,

The point wise comments of HCG (KCE) Private Limited are as follows:

Information sought	Comments of HCG
Point No. 1 Is there any existing or proposed project for industrial or commercial PNG pipeline infrastructure in Adampur area, Hisar district, Haryana?	HCG (KCE) Private Limited has been authorized to lay the CGD Network in Hisar GA. In term of said authorization it has planned progressively in phase manner.
Point No. 2: If such a project exists, kindly provide the following:	
a) The name of the executing agency/company	HCG (KCE) Private Limited
b) Scope of the project (areas covered, categories - industrial/commercial)	In terms of authorization, HCG has to build CGD Network which includes CNG Stations, Inch-km Pipeline, and Domestic Connections. In addition to that HCG will also build Industrial & Commercial Connections.
c) Project timeline - commencement and expected date of completion	HCG will adhere to MWP Targets and timelines stipulated by PNGRB.
d) Estimated budget and funding details	Confidential, can't share with any third party
e) Copies of any relevant approvals, DPRs (Detailed Project Reports), or sanctioned plans	
Point No. 3: Is there any plan for the installation or extension of PNG pipeline in Adampur town/village (Hisar district)? YES	
a) If yes, please provide the detailed project plan, timeline, and agencies involved.	HCG will adhere to MWP Targets and timelines stipulated by PNGRB.
b) If not, please state the reasons and whether any proposal has been submitted or under consideration.	N.A.
c) At how much distance the nearest PNG Pump is located near Kohli Village, Adampur, Hisar?	As on date, nearest CNG pump is available at M/s Bharat Filling Station at Village-Kabrel. It is approx. 14 km from Kohli Village Adampur. HCG may plan in future to build more CNG Pump, as per demand.

Point No. 4: Kindly provide a copy of the map/scheme showing existing and proposed PNG pipeline coverage in Hisar district, Haryana.	Confidential, can't share with any third party
Point No. 5: Kindly provide a copy of the map/scheme showing existing and proposed PNG pipeline coverage particularly in Adampur region in Hisar, Haryana.	
Point No. 6: Provide the name and contact details of the officer(s)/agency responsible for the PNG network planning and implementation in Hisar district.	HCG KCE Private Limited. Contact no. 9289462613
Point No. 7: Please provide a copy of any correspondence, file notes, or approvals regarding PNG pipeline work in Adampur in the last 3 years.	Confidential, can't share with any third party
Point No. 8: Whether any industrial estates or commercial zones in Adampur have been identified or approved for PNG pipeline connectivity? If yes, provide names and locations	Currently No specific industrial zone available in Adampur in reference to natural gas supply
Point No. 9, 9(a), 9(b) & 9(c): Whether any applications or demand surveys have been received from industrial or commercial establishments in Adampur for PNG connection? If yes, kindly share:	HCG hasn't received any application
Point No. 10: Provide a copy of the zonal map or project layout indicating current and planned pipeline network in and around Adampur for industrial/commercial consumers	Not available with HCG
Point No. 11: Name and contact details of the Nodal Officer or Regional Manager responsible for PNG planning and implementation in Hisar district.	Sh. Piyush Bodana, GA HEAD, +91-7698003420
Point No. 12: How much coverage of PNG gas line has been done till now in district Hisar, Haryana?	Steel pipeline laid – approx. 36 km MDPE pipeline laid - approx. 96 km

HCG (KCE) Private Limited is sincere and committed towards all its obligations and serving the public.

Submitted for consideration of the Hon'ble Board.

Thanks & Regards

Mohit Budhiraja
Associate General Counsel (Head Legal)



Fahad Imtiaz <fahadimtiaz11@gmail.com>

Case: Rakesh Kumar Vs Union of India & Ors. [O.A/582/2024]

Fahad Imtiaz <fahadimtiaz11@gmail.com>

Mon, Dec 22, 2025 at 5:03 PM

To: Pulkit Kapoor <pulkitkapoor099@gmail.com>

Cc: Ashish Rohlania <ashishrohlania20@gmail.com>, afpartners@consultant.com, Actilifeorganics@gmail.com, sunrisewoods18@gmail.com, info@afpartners.in, fahad.imtiaz@afpartners.in

To

Mr. Pulkit Kapoor
Advocate for the Applicant,

Dear Pulkit,

We, on the behalf of Respondent No.8 (M/s Actilife Organica) and Respondent No. 35 (M/s Sunrise Woods Industries), hereby serve you the scan copy of the Affidavit/s on the behalf of respondent no. 8 and 35.

| | Thanks & Regards,

[Quoted text hidden]

2 attachments **Affidavit Actilife Organics.pdf**
2178K **Affidavit Sunrise Woods Industries.pdf**
2470K