

**BEFORE THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA
ORIGINAL APPLICATION No. 154 of 2022**

IN THE MATTER OF:-

Yodh Bdr. Thapa

.... Applicant

Versus

Bharat Petroleum Corp. Ltd. & Ors.

... Respondents

INDEX

S.NO.	PARTICULAR	PG.NO.
1.	Counter Affidavit on behalf of the Respondent No. 2 (Sikkim State Pollution Control Board).	1-10
2.	<u>Annexure R-1</u> Copy of the E-mail dated 14.12.2022 of the Answering Respondent	11-12
3.	<u>Annexure R-2</u> Copy of the Show-Cause Notice bearing No. 2020/SPCB/999 dated 30.11.2022 issued by the Answering Respondent to the Respondent No. 1	13
4.	<u>Annexure R-3</u> Copy of the Direction bearing No. 2020/SPCB/1029 dated 09.12.2022 issued by the Answering Respondent to the Respondent No. 1	14
5.	<u>Annexure R-4</u> Copy of the Processing Details of the Respondent No. 1's application for grant of CTE retrieved from the web portal	15-17
6.	Proof of Service	18

Through



(SAMEER ABHYANKAR)
ADVOCATE FOR RESPONDENT NO.2
D-247, LGF, DEFENCE COLONY
NEW DELHI-110024

PLACE: NEW DELHI
Dated:10.01.2023

CC-2516
Email: contactadvsa@gmail.com
M-9953328394

BEFORE THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH AT KOLKATA
ORIGINAL APPLICATION NO. 154/ 2022/EZ

IN THE MATTER OF:-

YODH BDR. THAPA

.... APPLICANT

Versus

BHARAT PETROLEUM CORPORATION LTD. & ORS.

.... RESPONDENTS

COUNTER AFFIDAVIT ON BEHALF OF THE RESPONDENT NO. 2

I, Ashwani Kumar Chand, I.P.S., Resident Commissioner, Government of Sikkim, Sikkim House, 12, PanchsheelMarg, Chanakyapuri, New Delhi, do hereby solemnly affirm and most humbly and respectfully submit as under:

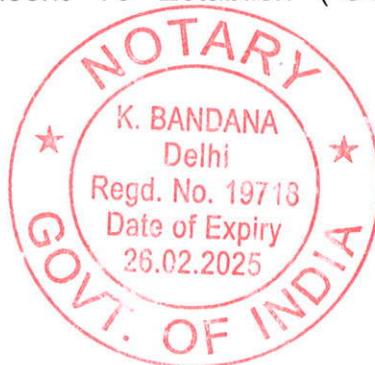
1. That I am the Resident Commissioner of the State Government of Sikkim, and as such am competent to depose to the contents of this affidavit. I have gone through the contents of the Petition and have understood its contents.



2. That I am authorized to swear the present affidavit based on the instructions received from the State Pollution Control Board, Forest & Environment Department, Government of Sikkim.
3. I say that the Applicant has filed the instant Original Application No. 154/2022/EZ titled *Yodh Bdr. Thapa v. Bharat Petroleum Corporation Limited & Ors.* before this Hon'ble Tribunal due to the alleged illegal construction of an oil depot on a plot adjacent to his residential plot of land by the Respondent No. 1.
4. I say that at the outset the Answering Respondent has duly complied with the Order dated 05.12.2022 passed by this Hon'ble Tribunal and has issued directions to the Respondent No. 1 for immediate halt of construction activities on 09.12.2022.

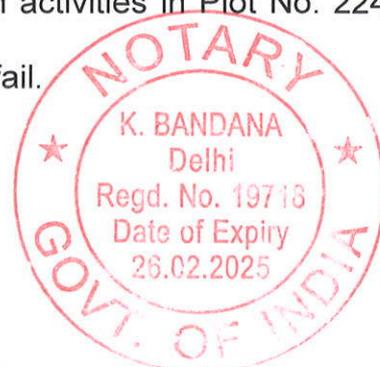
A copy of the E-mail dated 14.12.2022 of the Answering Respondent is annexed herewith as **Annexure – R1**.
5. The allegation as to the Answering Respondent not having taken any action against the Respondent No. 1 for the construction carried out by the Respondent No. 1 without obtaining a Consent To Establish (“CTE”), despite having

DL2



knowledge of the same, is incorrect. It is submitted that upon receiving information regarding construction being carried out by the Respondent No. 1, a site inspection was conducted by the Answering Respondent on 24.11.2022 and it was found that the construction work had already been started by the Respondent No. 1, without obtaining a CTE.

6. Thereafter, the Answering Respondent issued a Show-Cause Notice under Section 33A of the Water (Prevention and Control of Pollution) Act, 1974 ("**1974 Act**") r/w Section 31A of the Air (Prevention and Control of Pollution) Act, 1981 ("**1981 Act**") and Section 5 of the Environment (Protection) Act, 1986 ("**1986 Act**") bearing No. 2020/SPCB/999 dated 30.11.2022 to the Respondent No. 1, giving the Respondent No. 1 15 days to show cause as to why legal action should not be initiated against them. The Answering Respondent also issued another Notice bearing No. 2020/SPCB/1029 dated 09.12.2022, directing the Respondent No. 1 to ensure strict adherence to the Order dated 05.12.2022 passed by this Hon'ble Tribunal and to immediately stop further construction activities in Plot No. 2242 at Majhitar, Pakyong District without fail.



A copy of the Show-Cause Notice bearing No. 2020/SPCB/999 dated 30.11.2022 issued by the Answering Respondent to the Respondent No. 1 is annexed herewith as **Annexure – R2**.

A copy of the Direction bearing No. 2020/SPCB/1029 dated 09.12.2022 issued by the Answering Respondent to the Respondent No. 1 is annexed herewith as **Annexure – R3**.

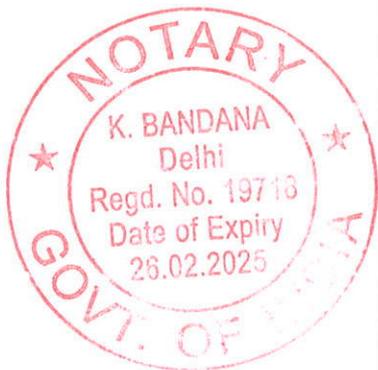
7. It is therefore submitted that there has been no dereliction of duty on the part of the Answering Respondent as alleged by the Applicant herein. The Applicant has duly taken cognizance and necessary action immediately, upon receipt of information as to construction being carried out by the Respondent No. 1 without the requisite permissions.
8. I say that the Respondent No. 1 had applied online on 27.09.2021 on the official web portal of the Answering Respondent i.e. <https://spcb.sikkim.gov.in/Consent.html> for the grant of CTE. However, the Respondent No. 1's online application was returned by the Answering Respondent as reflected in its official web portal i.e. <https://spcb.sikkim.gov.in/Consent.html> with a request to furnish



relevant documents and information. It is imperative to mention at this stage that the CTE was under process for approval and therefore the Respondent No. 1 was not entitled to undertake any construction work.

9. The details of the Respondent No. 1's application for grant of CTE and the reasons for the return of the same by the Answering Respondent on its official web portal i.e. <https://spcb.sikkim.gov.in/Consent.html>, owing to the non-submission of the required relevant information and supporting documents, on 6 occasions are set out in detail hereinafter chronologically and in a tabular form:

Sr. No.	Date of Submission by the Respondent No. 1	Activity	Reason for Return by the Answering Respondent
1.	27.09.2021	Returned by the Answering Respondent	Certified copy of all the relevant documents to be uploaded in PDF format.
2.	21.10.2021	Returned by the Answering Respondent	Certified copy of the Detailed Project Report ("DPR") to be uploaded in PDF format.
3.	17.11.2021	Returned by the Answering Respondent	All documents to be properly certified and scanned. Further, DPR lacks relevant information about the project i.e. investment details,



Handwritten signature in blue ink.

			technical specifications and processes, pollution issue and control measures, statutory permissions (EC, Fire NOC from the Petroleum and Explosives Safety Organization("PESO"), crisis management plan etc.).
4.	09.05.2022	Returned by the Answering Respondent	1. Capital investments to be provided for all civil work, plant and machinery, land and pollution control measures. 2. Authorization letter or Power of Attorney in respect of the authorized signatory to be provided.
5.	23.09.2022	Returned by the Answering Respondent	Legible registered Land Agreement in stamp paper to be uploaded.
6.	31.10.2022	Returned by the Answering Respondent	1. Attested copy of the Land Parcha to be uploaded in addition to the uploaded documents. 2. The DPR containing design details in compliance with the Central Pollution Control Board ("CPCB") Guidelines on Petrol Pumps vide Office Memorandum dated 07.01.2020 and the addendum to the Guidelines vide Office Memorandum dated 16.08.2021 to be uploaded. It is pertinent to point out for the purposes of this application that the DPR was specifically called for, so as to ensure that the location of

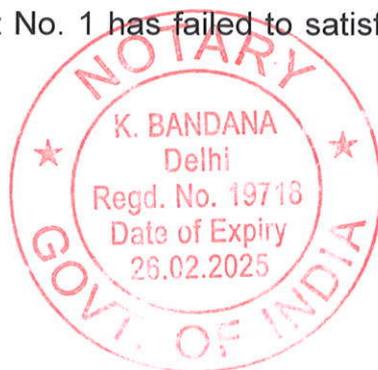


			the Respondent No. 1's proposed project was more than 50 meters from a residential area as required by the Siting Criteria provided under the Respondent No. 3's Office Memorandum with Reference No. B-13011/1/2019-20/AQM dated 07.01.2020 ("OM dated 07.01.2020") & the Office Memorandum with Reference No. B-13011/1/2019-20/AQM dated 16.08.2021 ("OM dated 16.08.2021").
--	--	--	---

A copy of the Processing Details of the Respondent No. 1's application for grant of CTE retrieved from the web portal is annexed herewith as **Annexure – R4**.

10. Therefore, it is submitted that the Answering Respondent had specifically returned, on its official website i.e. <https://spcb.sikkim.gov.in/Consent.html>, the Respondent No. 1's application for grant of CTE since it did not comply with the requirements of the applicable law.

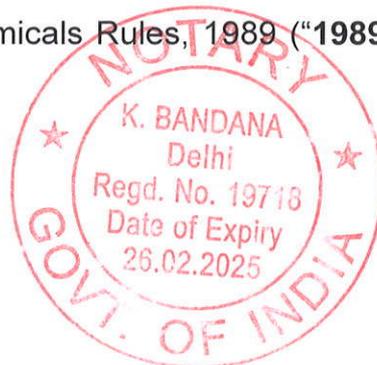
11. For the sake of completion of the record, it may be stated that the Respondent No. 1 has failed to satisfactorily respond to the



Show-Cause Notice dated 30.11.2022 (annexed at **Annexure - R2**) and the Direction dated 09.12.2022 (annexed at **Annexure - R3**). Therefore, and in compliance with this Hon'ble Tribunal's direction, the Answering Respondent has directed Respondent No. 1 to immediately stop further construction activities in Plot No. 2242 at Majhitar, Pakyong District without fail.

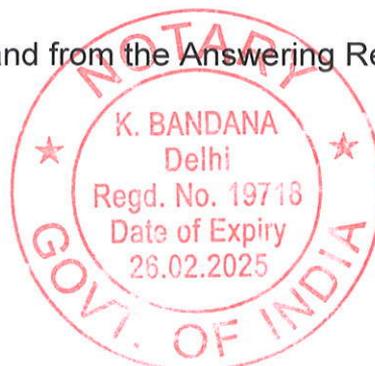
12. I say that the conduct of the Respondent No. 1 is totally in contravention to statutory provisions as they started the construction work without any CTE and without rendering any due intimation and prior knowledge to the Answering Respondent herein. The Respondent No. 1 has started the construction without any permission from the Answering Respondent.

13. I say that in so far as the allegation posed before this Hon'ble Tribunalas to the non-provision of a Siting Criteria requirement by the Answering Respondent, as laid down by the Respondent No. 3 vide the OM dated 07.01.2020, the OM dated 16.08.2021 and in accordance to the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 ("**1989 Rules**"), it is humbly



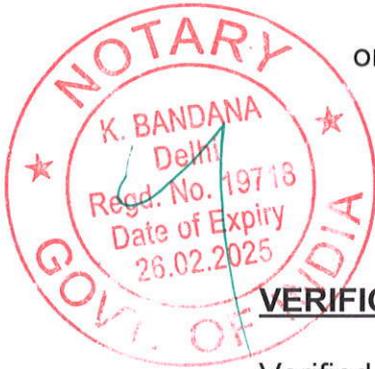
submitted that the Answering Respondent is duly compliant with the same. It is in the direction of compliance with the aforementioned provisions that the Answering Respondent had sought further information from the Respondent No. 1. Since the Respondent No. 1 failed to provide the requisite information, no CTE has been issued to Respondent No. 1 till date.

14. I say that in so far as the allegation posed before this Hon'ble Tribunal in regard to abiding by the 1989 Rules, it is humbly submitted that the Answering Respondent has duly followed and abided by Rule C of the Integrated Guidance Framework for Chemicals Safety in Respect of the Isolated Storages and Industries ("**IGFCS**") under the 1989 Rules, as brought out by the Respondent No. 6, by returning the Respondent No. 1's application for grant of CTE with a direction to the Respondent No. 1 to furnish the Onsite Emergency Plan, Safety Reports and Safety Audit Reports in accordance to the 1989 Rules. It is humbly submitted that the Respondent No. 1 failed to provide the same to the Answering Respondent and continued to carry on with the illegal constructions without any intimations or permissions of any kind to and from the Answering Respondent.



15. I say that as to the allegation posed before this Hon'ble Tribunal in regard to directions to be issued to the Answering Respondent to bring out a Standard Operating Procedure for the IGFCs under the 1989 Rules, it is humbly submitted that, as explained above, the Answering Respondent is duly compliant with the guidelines of the IGFCs under the 1989 Rules.

16. I say that the present affidavit is true to the best of my knowledge and information received from the Answering Respondent and nothing material has been concealed therefrom. The annexures are true copies of their respective originals.



DEPONENT
Ashwani Kumar Chand, *IPS*
Resident Commissioner
Government of Sikkim

Sikkim House, 12, Panchsheel Marg,
Chanakyapuri, New Delhi-110 021

VERIFICATION:

Verified at New Delhi on 10 JAN 2023 day of _____, 2023, that the contents of the above said affidavit are true and correct to the best of my knowledge and belief. Nothing material has been concealed therefrom.

DEPONENT
Ashwani Kumar Chand, *IPS*
Resident Commissioner
Government of Sikkim

Sikkim House, 12, Panchsheel Marg,
Chanakyapuri, New Delhi-110 021

Identified by:
[Signature]
Vai Vaidee
Chetri.

10 JAN 2023

ATTESTED

IDENTIFIED

**NOTARY PUBLIC, DELHI
GOVT. OF INDIA**

vani@innovatuslaw.in

From: Sameer Abhyankar <sameer@innovatuslaw.in>
Sent: Saturday, December 17, 2022 7:33 PM
To: vani@innovatuslaw.in
Cc: abhinav@innovatuslaw.in; nishi@innovatuslaw.in
Subject: FW: Original Application No. 154/222/EZ before the Hon'ble National Green Tribunal-reg.
Attachments: THAPA ORDER.pdf; IA FOR STAY-1.pdf; 01_Complete-Petition_001_1669144021852.pdf
Flag Status: Flagged

Thanks & Regards

--

Sameer Abhyankar
Partner



Mob: +91-9953328394 | **Email:** sameer@innovatuslaw.in

Web: www.innovatuslaw.in

Address: D-247, Basement, Defence Colony, New Delhi - 110024

Reduce your environmental footprint. Print only if necessary.

CONFIDENTIALITY INFORMATION AND DISCLAIMER:

This email message and its attachments may contain confidential, proprietary or legally privileged information and is intended solely for the use of the individual or entity to whom it is addressed. If you have erroneously received this message, please delete it immediately and notify the sender. If you are not the intended recipient of the email message you should not disseminate, distribute or copy this e-mail. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, incomplete or contain viruses and the sender accepts no liability for any damage caused by the limitations of the e-mail transmission.

From: spcb sikkim [<mailto:spcbsikkim@gmail.com>]

Sent: 14 December 2022 13:11

To: sameer@innovatuslaw.in

Subject: Original Application No. 154/222/EZ before the Hon'ble National Green Tribunal-reg.

Sir,

The State Pollution Control Board-Sikkim is in receipt of orders of the Hon'ble National Green Tribunal, Eastern Zone Branch on the subject cited above. Reference to the said order, directions for immediate halt of construction activities by M/s Bharat Petroleum Corporation Ltd at Majhitar, Rangpo has been issued on 09/12/2022 and the same has been also intimated to District Collector, Pakyong District.

Hence, copies of the said appeal and orders of the Hon'ble NGT have been attached herewith for kind information. The Board requests you to kindly provide advice and guidance on the said matter please.

Thanking you,

Regards,
SPCB, Sikkim


TRUE COPY



Handwritten signature and text in the top right corner.

ANNEXURE - R2

STATE POLLUTION CONTROL BOARD-SIKKIM
FOREST & ENVIRONMENT DEPARTMENT
GOVERNMENT OF SIKKIM
DEORALI, GANGTOK - 737102

E.No. 2020/SPCB/999

Dated: 30/11/2022

To,
The General Manager,
M/s Bharat Petroleum Corporation Ltd.,
Majhitar, Rangpo, Pakyong District-737136.

Sub: Show cause notice.

WHEREAS, all industries having pollution potential including oil depots and petrol pumps are required to obtain Consent to Establish & Operate and its renewal thereof from the SPCB under Section 25 of the Water (Prevention & Control of Pollution) Act, 1974 and Section 21 of the Air (Prevention & Control of Pollution) Act, 1981; and

WHEREAS, your application no. 222088 for grant of Consent to Establish vide the SPCB-Sikkim OCMMS portal was returned due to non submission of required information; and

WHEREAS, reply to the clarification raised in the OCMMS portal has not been received by the SPCB-Sikkim till date; and

WHEREAS, information regarding construction of oil depot was received by the Board from Shri Y.B. Thapa on 31/10/2022; and

WHEREAS, based on the complaint received, inspection was conducted by a team of SPCB officials on 24/11/2022 and observed various non compliances in your unit; and

WHEREAS, during inspection it was observed that you have started construction of oil depot prior to obtaining Consent to Establish from SPCB-Sikkim; and

WHEREAS, during inspection it was observed that you have installed DG set within your premises prior to obtaining Consent to Establish from SPCB-Sikkim; and

NOW, THEREFORE, in exercise of the powers vested under Section 33A of the Water (Prevention & Control of Pollution) Act, 1974 read with Section 31A of the Air (Prevention & Control of Pollution) Act, 1981 and Section 5 of the Environment Protection Act, 1986, M/s Bharat Petroleum Corporation Ltd. located at Majhitar, Pakyong District is directed to show cause as to why legal action should not be initiated against you within 15 days of issue of this notice.

In case of default in compliance with the above conditions or any other exigencies, the SPCB-Sikkim will be constrained to initiate action in accordance with the provisions of the EPA, 1986 and levy Environmental Compensation without giving any further notice.

Handwritten signature of Dr. Gopal Pradhan.

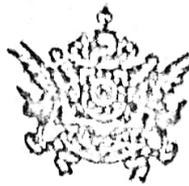
(Dr. Gopal Pradhan)
Member Secretary,
State Pollution Control Board-Sikkim

Dr. Gopal Pradhan
Member Secretary
State Pollution Control Board
Forest Env & W.L Mngt Deptt
Govt of Sikkim Gangtok



TRUE COPY

Handwritten initials 'MC' at the bottom left.



7/12/2022
 09:11 AM

ANNEXURE - R3

STATE POLLUTION CONTROL BOARD-SIKKIM
FOREST & ENVIRONMENT DEPARTMENT
GOVERNMENT OF SIKKIM
DEORALI, GANGTOK - 737102

F. No. 2020/SPCB/1029

Dated: 9/12/2022

To,

The General Manager,
 M/s Bharat Petroleum Corporation Ltd.,
 Majhitar, Rangpo, Pakyong District-737136.

Sub: Directions under Section 33A of the Water (Prevention and Control of Pollution) Act, 1974 read with Section 31A of the Air (Prevention & Control of Pollution) Act, 1981 and Section 5 of the Environment (Protection) Act, 1986-reg.

WHEREAS, all industries having pollution potential including oil depots and petrol pumps are required to obtain Consent to Establish & Operate and its renewal thereof from the SPCB under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 and Section 21 of the Air (Prevention and Control of Pollution) Act, 1981; and

WHEREAS, you were issued showcause notice vide F. No. 2020/SPCB/999 dated 30/11/2022 by the SPCB-Sikkim; and

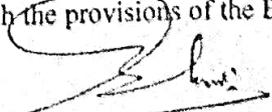
WHEREAS, you have commenced construction activity of the oil depot along with installation of necessary infrastructure without obtaining mandatory consent to Establish in contravention of Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 and Section 21 of the Air (Prevention and Control of Pollution) Act, 1981; and

WHEREAS, as per the Original Application in the matter before the Hon'ble National Green Tribunal (Eastern Zone Bench) O.A. 153/2022/EZ Yodh Bdr. Thapa Vs. BPCL & Ors. dated 05/12/2022, the applicant, Shri Y.B. Thapa has stated that the proposed oil depot construction site is located at a distance of 15 feet from the applicant's boundary wall; and

WHEREAS, as per the orders of the Hon'ble National Green Tribunal (Eastern Zone Bench) dated 05/12/2022, M/s BPCL has been restrained from carrying out further construction activity in Plot no 2242, Majhitar, Pakyong District; and

NOW, THEREFORE, in exercise of the powers vested under Section 33A of the Water (Prevention & Control of Pollution) Act, 1974 read with Section 31A of the Air (Prevention & Control of Pollution) Act, 1981 and Section 5 of the Environment Protection Act, 1986, **The General Manager, M/s Bharat Petroleum Corporation Ltd. located at Majhitar, Pakyong District** is directed to ensure strict adherence to the above mentioned orders of the Hon'ble National Green Tribunal and immediately stop further construction activity in Plot no. 2242 at Majhitar, Pakyong District without fail.

In case of default in compliance with the above or any other exigencies, the SPCB-Sikkim will be constrained to initiate action in accordance with the provisions of the EPA, 1986 and other relevant Acts without giving any further notice.


 (Dr. Gopal Pradhan)
 Member Secretary,
 State Pollution Control Board-Sikkim

TRUE COPY



Industry Name : BPCL RANGPO

Date Time: 27-09-2021 12:18

Note By: RC-1(SPCB01)

Forwarded To: EEE

Activity: Return

Description: Certified copy of all relevant documents may be uploaded in PDF please.

Activity: Forward

Activity: Application Re-Submitted

Note By: (Industry)

Date Time: 20-10-2021 05:23

Forwarded To: RC-1

Date Time: 21-10-2021 12:14

Note By: RC-1(SPCB01)

Forwarded To: RC-1

Activity: Return

Description: Certified copy of DPR may be uploaded in PDF please.

Activity: Forward

Activity: Application Re-Submitted

Note By: (Industry)

Date Time: 06-11-2021 01:28

Forwarded To: RC-1

Date Time: 08-11-2021 11:35

Note By: RC-1(SPCB01)

Forwarded To: EEE

Description: Consent to Establish LPG Bottling and Oil Depot at Majhitar, Rangpo, East Sikkim an application received from Karun Krishnan K, M/s BPCL RANGPO, TM Siliguri, NJP TOP, BhaktiNagar, Jalpaiguri. Submitted please.

Date Time: 17-11-2021 02:53

Note By: EEE(SPCB03)

Forwarded To: RC-1

Description: All documents may be properly certified and scanned. Further, DPR lacks relevant information about the project i.e investment details, technical specifications and processes, pollution issues and control measures, statutory permissions viz. Environmental Clearance, PESO, Crisis management plan etc. The applicant may visit the office for discussion on the matter.

Activity: Return

Description: All documents may be properly certified and scanned. Further, DPR lacks relevant information about the project i.e investment details, technical specifications and processes, pollution issues and control measures, statutory permissions viz. Environmental Clearance, PESO, Crisis management plan etc. The applicant may visit the office for discussion on the matter.

Activity: Forward

Activity: Application Re-Submitted

Note By: (Industry)

Date Time: 26-04-2022 03:13

Forwarded To: RC-1

Date Time: 27-04-2022 01:58

Note By: RC-1(SPCB01)

Forwarded To: EEE

Description: File re submitted please.

Date Time: 09-05-2022 06:53

Note By: EEE(SPCB03)

Forwarded To: RC-1

Description: 1. Capital investment may be provided for all civil work, plant and machinery, Land and pollution control measures. 2. Authorization letter or power of attorney in respect of the authorized signatory may be provided.

Activity: Return

Description: 1. Capital investment may be provided for all civil work, plant and machinery, Land and pollution control measures. 2. Authorization letter or power of attorney in respect of the authorized signatory may be provided.

Date Time: 07-09-2022 03:55

Note By: RC-1(SPCB01)

Forwarded To: EEE

Description: Application re submitted please.

Date Time: 23-09-2022 04:12

Note By: EEE(SPCB03)

Forwarded To: RC-1

Description: Legible Registered copy of the land agreement in stamp paper may be uploaded.

Activity: Return

Description: Legible Registered copy of the land agreement in stamp paper may be uploaded.

TRUE COPY

Activity: Forward

Activity: Application Re-Submitted

Note By: (Industry)

Date Time: 12-10-2022 04:41

Forwarded To: RC-1

Date Time: 13-10-2022 12:48

Note By: RC-1(SPCB01)

Forwarded To: EEE

Description: Application re submitted please.

Date Time: 21-10-2022 11:07

Note By: EEE(SPCB03)

Forwarded To: RC-1

Description: 1. Attested copy of land parcha to be uploaded in addition to currently uploaded documents uploaded. 2. Detailed Project Report containing design details in compliance with the CPCB Guidelines on Petrol pump vide Office Memorandum dated 7th Jan 2020 and Addendum to the CPCB guidelines vide O.M dated 16th August 2021.

Activity: Return

Description: 1. Attested copy of land parcha to be uploaded in addition to currently uploaded documents uploaded. 2. Detailed Project Report containing design details in compliance with the CPCB Guidelines on Petrol pump vide Office Memorandum dated 7th Jan 2020 and Addendum to the CPCB guidelines vide O.M dated 16th August 2021.

Activity: Forward

Activity: Application Re-Submitted

Note By: (Industry)

Date Time: 26-10-2022 04:57

Forwarded To: RC-1

Date Time: 31-10-2022 12:20

Note By: RC-1(SPCB01)

Forwarded To: RC-1

Activity: Return

Description: 1. Attested copy of land parcha to be uploaded in addition to currently uploaded documents uploaded. 2. Detailed Project Report containing design details in compliance with the CPCB Guidelines on Petrol pump vide Office Memorandum dated 7th Jan 2020 and Addendum to the CPCB guidelines vide O.M dated 16th August 2021.

[Handwritten signature]
HUS



Proof of Service

18

Office of Sameer Abhyankar <contactadvsa@gmail.com>

Advance Service Yodh Bdr. Thapa vs Bharat Petroleum Corp .Ltd & Ors O.A No. 154/2022

1 message

Office of Sameer Abhyankar <contactadvsa@gmail.com>

Tue, Jan 10, 2023 at 7:02 PM

To: akshar@outlook.com, cmd@bharatpetroleum.in, ccb.cpcb@nic.in, dm-pakyong@sikkim.gov.in, explosives@explosives.gov.in, e-secy-moef@nic.in

Dear sir

Advance Service Yodh Bdr. Thapa vs Bharat Petroleum Corp .Ltd & Ors O.A No. 154/2022

Please find attached a scanned copy of the Counter affidavit on behalf of the Respondent No. 2 (Sikkim State Pollution Control Board) in the captioned Matter.

Regards
Prince Kumar
For
Mr. Sameer Abhyankar, Adv
M-7004629902

--
Address for Correspondence:
D-247, LGF, Defence Colony,
New Delhi 110024
Ph. +91-11-49402169

 **Counter Affidavit.pdf**
5045K