

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

O.A. No.02 of 2024/EZ.

Sri Tapas Kumar Bal. ... Applicant.
-Versus-
State of Orissa & others. ... Respondents.



**COUNTER AFFIDAVIT FILED ON BEHALF
OF THE RESPONDENTS/OPP.PARTIES
NOs.3 & 5.**

I, Sri Nilakantha Behera, aged about 58 years, Son of late Nidhi Behera, at present working as Tahasildar, Ghasipura Tahasil, Keonjhar, Dist: Keonjhar do hereby solemnly affirm and state as follows:-

1. That I am Opp.Party No.5 in this case and swearing this affidavit for self and on behalf of the Opp.Party No.3 being duly authorized by him.
2. That I have gone through the abovementioned original application and have understood the contents thereof. In my official capacity I am well acquainted with the facts of the case and thus competent to swear this affidavit.

Nilakantha Behera

AP/Keonjhar

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17.09.2024
AMBIKA PRASAD RAY
NOTARY, CUTTACK TOWN
REGD. NO-ON-56/2004

3. That the aforesaid original application has been filed by the applicant before the Hon'ble National Green Tribunal, Eastern Zone Bench, Kolkata challenging the action of the State Respondents in curbing the illegalities and violation of Sustainable Sand Mining Management Guidelines 2016, environment norms by the private respondent in operating the Kusei Sand Bed, Deogaon over an area of 11.50 acer 4.654 ha in village: Deogaon of Ghasipura Tahasil under Keonjhar district and the said sand mining operation is in violation of Standard Environment Clearance Conditions and Sustainable Sand Mining Management Guidelines, 2016 and Enforcement & Monitoring Guidelines for Sand Mining, 2020, Odisha Sand Policy 2021, EIA Notification and Supreme Court order and order of Hon'ble NGT.

4. That the averments made in paragraph-1 of the original application call for no reply from this deponent.

5. That in reply to the averments made in paragraphs-2 and 3 of the original application, it is humbly submitted that "Kusei River sand Bed, Deogaon" involving the land as scheduled below is listed as permanent sairat source of this Tahasil since long. It had been put to auction as per the provisions of

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AMBIKA PRASAD RAY
NOTARY, CUTTACK TOWN
REGD. NO-ON-56/2004

- 3 -

the OMMC Rules 1990 & 2004 with the enforcement of OMMC Amendment Rules-2014 the source has been leased out as per the provisions of the said Rules. Subsequently the OMMC Rules, 2016 came in to force vide SRO No.601/2016 on 15.12.2016. Presently the said source is leased out as per the provisions of OMMC Rules-2016.

The said source is published for auction vide this office proclamation No.2160 dt.18.04.2022 fixing the period of lease for 05 year i.e. from 2022-23 to 2026-27. The proclamation has been uploaded in dist website and published in daily newspaper Pragatibadi and Dharitri by I & PR Department. The notice is also dispatched to prominent Govt. Offices of the Sub-Division, R.I. Circle, Kesuderapal and concerned GP office for wide circulation among general public.

Shri Gorle Ramesh on behalf of Sri Sai construction has quoted highest bid amount of Rs.2265/-towards 1cum of Additional charge and complied all stipulation as laid down in Rules 27(4) of OMMC Rules-2016. Thus Sai construction is selected to take lease of "Kusei River sand Bed, Deogaon" and intimated in Form F to convey his acceptance the terms and conditions and deposit the amount as per the assessment. Accordingly assessment has been made to the tune of Rs.1,88,87,542.00/-towards royalty etc. for

*B
AK/14*

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 NOTARY, CUTTACK TOWN
 REGD. NO-ON-56/2004

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- 4 -

the 1st year. The land schedule of Kusei River Sand Bed, Deogaon is given below:-

Land Schedule

Mouza	Khata No	Plot No	Area	Kisam
Deogaon	352	1297/1	Ac11.50	Nadi

Copies of Bid Sheet and Assessment letter are annexed herewith as Annexures-A/5 & B/5 respectively.

6. That in reply to the averments made in paragraphs-4 to 6 of the original application, it is humbly submitted that the required Mining plan, Environment Clearance and consent to operate order are obtained from the concerned quarters and Lease Agreement is made vide Form-N as per Rule 27(13) of OMMC Rules-2016.

In response to the allegations, the deponent most humbly submit that required steps such as demarcation of lease hold area and pillar posting work are taken up to check illegal extraction. Besides the source is regularly verified by our field functionary/Revenue Inspector and Revenue Authorities. The allegation as regards using of machine of different capacities by the Respondent No.14 for removal of sand is not reported from any quarters.

Nilakanta Babu

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AMBIKA PRASAD RAY
NOTARY, CUTTACK TOWN
REGD. NO-ON-56/2004

The allegation as regards using of heavy vehicles for lifting of sand is also not noticed. Thus the submission made by the petitioner is not acceptable.

7. That in reply to the averments made in paragraphs-7 and 8 of the original application, it is humbly submitted that the sand source in question has already been handed over to the Mines Department vide this Office letter No.5057/Touzi dated 20.11.2023 for control and management. Copy of Letter No.5057/Touzi dated 20.11.2023 is annexed herewith as **Annexure-C/5**.

8. That the averments made in paragraphs-9 to 11 of the original application regarding use of heavy vehicles, excess sand mining and other irregularities are beyond the knowledge of the deponent. In this context, it is humbly submitted that though the agreement was made on 10.07.2023, by virtue of G.O. No.883 dated 06.01.2023 and the said sand source has already been transferred to the Steel & Mines Department, Government of Odisha vide letter No.5057/Touzi dated 20.11.2023 under Annexure-C/5 to this counter affidavit. Copy of G.O. No. 883 dated 06.01.2023 is annexed herewith as **Annexure-D/5**.

9. That the averments made in paragraphs-12 to 23 of the original application, call for no reply from this deponent.


AMBIKA PRASAD RAY
NOTARY, CUTTACK TOWN
REGD. NO-ON-56/2004

Milankanta Behera


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10. That the Respondents carves the leave of the Hon'ble Court to file fresh affidavit, it required in the interest of the lis.

11. That the original application is otherwise improper unjustified and as such is liable to be dismissed.

12. That the facts stated above are true to the best of my knowledge and belief based on official records.

Identified by:-

Saswata Palwalku
Advocate

Nilakantha Bellma
Deponent
TAHASILDAR
GHASIPURA
02.04.2024

Certificate

Certified that the cartridge papers are not readily available.

CUTTACK.

Date:02.04.2024

Saswata Palwalku
Addl. Government Advocate.



Nilakantha Bellma
The above named deponent being identified by *S. Saswata* Adv. solemnly affirm and state before me that the contents of *Certified* are true to the best of *his* or their knowledge and belief.

02.04.24
AMBIKA PRASAD RAY
NOTARY, CUTTACK TOWN
Regd. No.-ON-56/2004

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ANNEXURE-A/5

BID SHEET

Sairat Case No. 02/2022

Name of the Minor Minerals source for grant of 5 yrs. lease

Kusai sand Bed, Deogarh

Village	Survey No.	Plot No.	Kissam	Area
Deogarh	352	1297	Nade	11.50

PS - Ghasipura, Tahasil - Ghasipura, District - Keonjhar
 Place of verification of lease application
 Date: 25.5.2022 Time - 11 AM

Govt rate of Royalty for One Cu.M. Of
 Scrutiny Check list of Applications for Lease of Sairat source

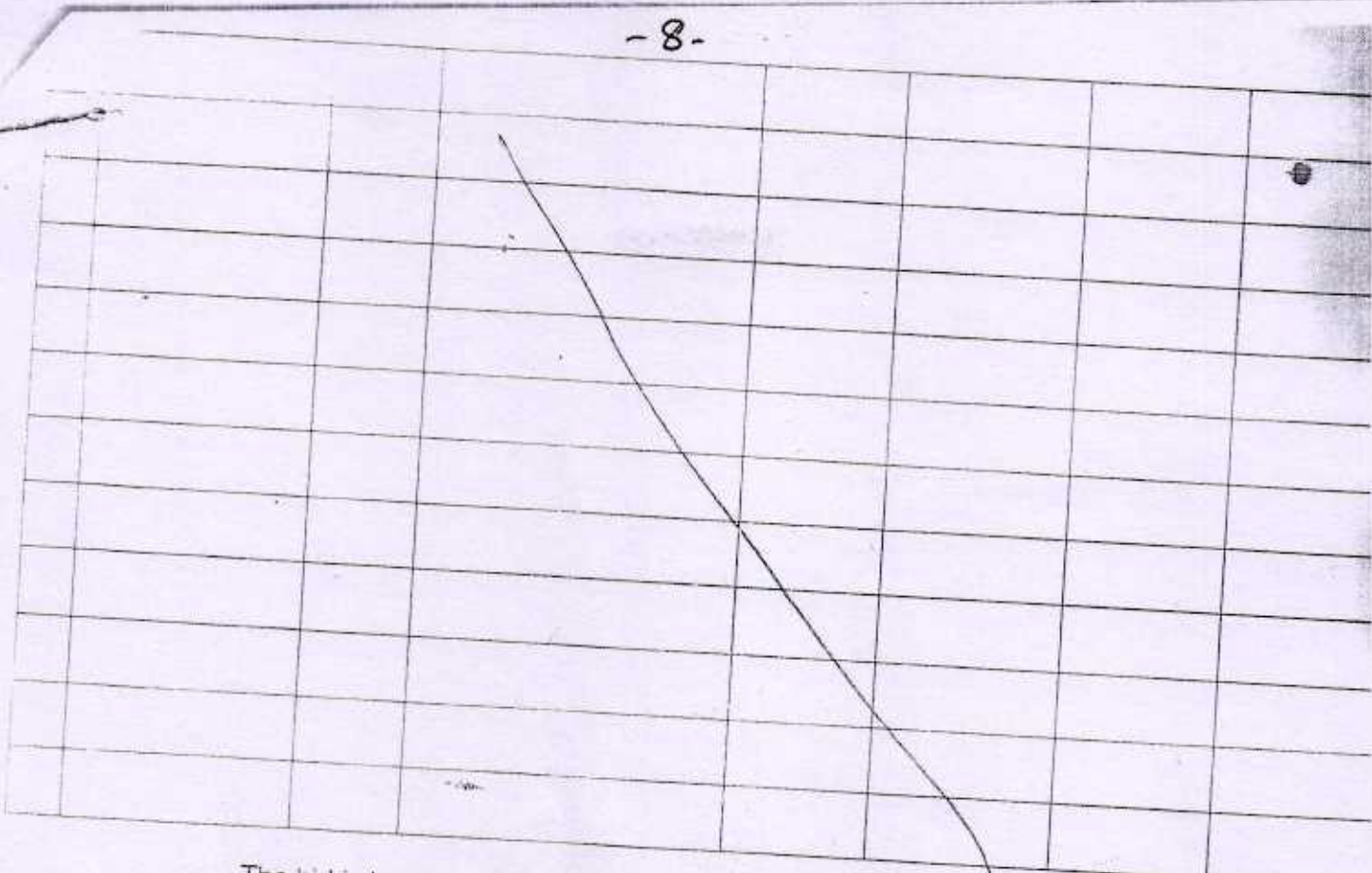
Govt rate of Royalty for One Cu.M. Of Sand-Rs

MGQ-

Cu.M

Sl n o	Name of the applicant	Documents enclosed				EMD	Additional charge quoted for one Cu.M.(in Rs)	Remark
		TC OF Rs10 00/-	Income Tax return of previous year/Bank Guarrenty	Court affidavit				
1	2	3	4	5	7	8	9	
01	Lalita Rajan Nayak	Yes	BG → 92,00,000/- ✓	Yes	19600/-	1279.00	✓	
02	Niranjan Sahoo	Yes	IT Retn → 12,45,080/- ✓	Yes	50000/-	142.85	✓	
03	Sree Sree Constn. Patengara	Yes	IT Retn → 16,27,990/- ✓	Yes	50000/-	2265.00	WSE	
04	A.K. Mohanty Const. Pat. Bid	Yes	IT Retn → 40,93,210/- ✓	Yes	20,000/-	250.00	✓	
05	Sanima Kar	Yes	IT → 1,49,13,350/- ✓	Yes	20,000/-	989.00	✓	
06	Susarla Roud	Yes	IT → 22,32,580/- ✓	Yes	20,000/-	261.00	✓	
07	Gopal ch. Acharya	Yes	IT → 98,54,480/- ✓	Yes	43000/-	1351.00	✓	
08	Satyabrata Parida	Yes	IT → 71,60,710/- ✓	Yes	19600/-	980.00	✓	
09	Asreeh Ku. Mohanty	Yes	IT → 9,72,420/- ✓	Yes	20,000/-	150.00	Less IT ✓	
10	Sanjaya Ku. Mish	Yes	IT → 71,04,750/- ✓	Yes	20,000/-	979.00	✓	
11	Nihar Ranjan Mandh.	Yes	IT → 2,34,93,650/- ✓	Yes	19600/-	1555.00	2nd ✓	

TAHASILDAR
GHASIPURA



The bid is knocked down in favour of Sri Gorie Lamesh on behalf of Sri S. S. Jee Construction Village - G. A. Plot PS No. N/2-5 under Drawing B.S. in the district of N.D. 136 Jagdal Vahas 1305 who has quoted the highest amount of addl charge at Rs. 2265/- (Rupees Two thousand two hundred sixty five) only for one cum of Sand for the source... K. Umesh Kumar Sand Bed, Deogarh

Signature of the applicant/representatives

[Signature]
25/05/22
Tahasildar, Ghasipura & Competent Authority.

- Bhagya Kama Baidai
- Deviendra M Jena
- Ajmer Kumar Sahu
- Udaya Nath Saha
- Nirastoy Saha
- Arabinda Patra
- Ranjan Das
- Padmajalabhai Sen
- Parsi Bihari Saha
- Deviendra Jena

TK
25/05/22
[Signature]
TAHASILDAR
GHASIPURA

- 9 -
OFFICE OF THE TAHASILDAR, GHASIPURA

No. 2287/Touzi/dt. 27.6.2023

400
ANNEXURE-B/5

To
Shri Gorle Ramesh on behalf of Sri Sai construction G.A. Plot No.-N/2- 54, under Drawing B.S.No-136 Flat No-3, 3rd floor, Treelet Hames, Plot No-868/3040, Khata No.691 Jayadev Vihar IRC village-Nayapalli, Bhubaneswar, 751015

Sub: Demand notice for payment of royalty and other charges for 1st year of lease of Kusei River sand Bed, Deogaon. (i.e. for 2023-24)

It is to inform you that proposal for transfer of E.C. in respect of Kusei River Sand Bed, Deogaon has been approved by SEIAA, Odisha, Bhubaneswar. As per rule-32 of the OMMC Rule-2016 lessee shall pay royalty or dead rent, surface rent, additional charge amount of contribution payable to the District Mineral Foundation, amount of contribution payable to the Environment Management Fund etc. The sub-para (3) of the Rule-32 has clarified that the lessee shall be liable to pay additional charge, amount of contribution payable to the District Mineral Foundation and an amount of contribution payable to the Environment Management Fund in advance. Under Sub-para (5) The royalty, additional charge amount contribution to the District Mineral Foundation and amount of contribution payable to the Environment Management Fund for the period up to commencement of the next year shall be paid on a pro-rate basis before the execution of lease deed.

Hence you are directed to deposit the royalty as well as other charges as calculated below at the earliest for further course of action at this end. Further you are directed to execute the lease deed within the fifteen days of deposit of royalty and other charges.

Nature of demand	At the rate	Quantity in Cum. to be lifted in one year as per EC	Total demand in Rs.
Royalty including additional charge	35+2265=2300x7000	7000	16100000.00
Surface Rent	@ 360/- of royalty x 4.654	---	1675/-
Dead Rent	@ 10500 of royalty x 4.654	---	48867.00
Dist. Mineral foundation	@10% of royalty	---	1610000/-
EMF	@5% of royalty	---	805000.00
Income tax	2% of royalty	---	322000/-
Total			18887542.00

Royalty 16100000
 Surface 1675/-
 Dead 48867/-
 D.M.F. 1610000/-
 E.M.F. 805000/-
 I.T. 322000/-
 Total 19320000/- vide M.R.No 369591 dt 01/7/23
 Ord. D.M.F. 1610000/-
 D.K. Total 10,75,542/- vide M.R.No. 036950 dt 01/7/23
 No. 19320000/- vide M.R.No 369591 dt 01/7/23
 W. B. Mark

**TAHASILDAR
GHASIPURA**

(One crore Eighty eight lakh eighty seven thousand five hundred forty two) only

(Signature)
Tahasildar, Ghasipura.

Memo No 2288/Touzi/Date 27-06-2023

Copy submitted to the Sub-Collector, Anandapur for favour of information and necessary action.

(Signature)
Tahasildar, Ghasipura

OFFICE OF THE TAHASILDAR, GHASIPURA.

Letter No. 5052 /Touzi/Dt. 20/11/2022

To

The Mining Officer, O/O the Deputy Director Mines, Keonjhar.

Sub: -

Handing over the Sairat case records and files concerned in respect of Ghasipura Tahasil.

Ref:-

Revenue & D.M. Department letter No.38318/R & D.M. dt.31.1.23.

Sir,

With reference to the letter on the subject cited above, I am to say that, the the following case records, files and other documents in original as detailed below for your kind information and further course of action at your end.

Sl No.	Case No.	Name of the Sairat sources	No. Of pages order sheet & correspondence	No of Mining Plan	No of application of bidder
1	2/2021-22	Kusei River Sand Bed, Deogaon (operational)	1 to 123 pages	1 Book	11 Nos.
2	7/2020-21	Ostapura Stone Quarry	1 to 85 pages	1 Book	4 Nos.
3	3/2020-21	Bholonugaon Stone Quarry	1 to 43 pages 1 -File no- viii/24/22	1 B ook	3 Nos.
4	1/2020-21	Basantapura stone Quarry	1 to 70 pages	1 Book	2 Nos.
5	01/2020-21	Remala River sand Bed Khailo	1 to 51 pages	1 Book	3 Nos.
6	01/2019-20	Baitarani River Sand Bed, Tampo	1 to	1 book	
7	6/2020-21	Patilo Laterite Quarry	1 to 64 pages	1 book	2 nos

This is for your information and necessary action.

Yours faithfully,

[Signature]
20/11/23
Tahasildar, Ghasipura

End:- As above

[Signature]
20/11/23
TAHASILDAR
GHASIPURA

Memo No 5055 /Touzi/Dt 20/11/2023

Copy Submitted to the Additional District Magistrate (Revenue), Keonjhar/Sub-Collector, Anandapur for favour of kind information.

[Signature]
20/11/23
Tahasildar, Ghasipura.

Received
6/12/23
No. sources
20/11/23 except
1. No. 11 as the same is
under Subjudice
[Signature]
20/11/23
M.O.C.K

ANNEXURE-2/5
By e-Mail

GOVERNMENT OF ODISHA
REVENUE AND DISASTER MANAGEMENT DEPARTMENT

No. RDM-MMS-POLICY-0006-2019-883 /R&DM dated 06 JAN 2023

From Sri Satyabrata Sahu, IAS
Additional Chief Secretary to Government

All Collectors

Sub: Guidelines for smooth transfer of Minor Mineral sources to the administrative control of Steel & Mines Department

Madam/ Sir,

In inviting a reference to the subject mentioned above, I am to say that the Odisha Government Rules of Business has been amended by substituting the word "Sairat" appearing against item No 30 under the "State Subjects" against Branch No.1 "Revenue" with "Sairat except minor minerals as defined under the Mines and Minerals (Development and Regulation) Act, 1957" vide GA & PG Department Notification No 32882 dated 21.11.20229 (Copy enclosed).

2. In the meanwhile, OMMC Rules 2016 have been amended vide Notification No.12167 dated 27.12.2022 by Steel & Mines Department (Copy enclosed) wherein Tahasildar and Collector of the District have been substituted with Mining officer and Dy Director Mines as the Competent Authority & Controlling Authority respectively. However, since filling up the positions will take some time, the aforesaid amended OMMC Rules also provides that in order to ensure smooth transfer of minor mineral sources, the existing arrangement will continue till the new system is put in place.

In this connection, a meeting was held on 28.11.2022 under the Chairmanship of Chief Secretary, Odisha wherein the following decisions pertaining to phasing of transfer of sources to Steel and Mines Department were taken:

(a) The presently operational minor minerals source shall be transferred to Steel & Mines Department preferably in Districts where DDM/MO of Steel & Mines Department are in place

(b) The districts where DDM/MO are not in place, sources shall not be transferred at present. The transfer will take place when DDM/MO is posted.

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GHASIPURA

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SRA (TOM 21)
No. 883
From Sri Satyabrata Sahu, IAS
Additional Chief Secretary to Government
All Collectors
Sub: Guidelines for smooth transfer of Minor Mineral sources to the administrative control of Steel & Mines Department
Madam/ Sir,
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(a) The presently operational minor minerals source shall be transferred to Steel & Mines Department preferably in Districts where DDM/MO of Steel & Mines Department are in place
(b) The districts where DDM/MO are not in place, sources shall not be transferred at present. The transfer will take place when DDM/MO is posted.

(c) The sources which are yet to be operationalized and no bidding has been initiated are also to be transferred to Steel & Mines Department for necessary action in a phased manner.

(d) The sources which are under process of bidding shall continue to be looked after by the Tahasildars till the sources are operationalized and shall be handed over to the Steel & Mines Department thereafter.

4. In view of the above, you are requested to adhere to the following procedure to ensure smooth transfer of minor mineral sources to the control of Steel and Mines Department.

A. Inventory of all case records relating to Minor Mineral Sairat Sources to be done immediately and to be categorized in the following manner.

- I. Sources already settled
- II. Sources which are not yet put to auction
- III. Sources which are under process of auction

The first two categories of the case records need to be transferred immediately under proper acknowledgement. The third category of records are to be transferred after operationalization of the sources.

B. Brief basic information about status of each sairat source need to be prepared in the following format and the same is to be handed over to the Officer concerned.

Format-A (Sources already settled)

Sl No.	Name of the Tahasil	Year	Name of the RI circle	Name of the source with Case Record No.	Lease Period		Annual Lease value	Payment made by the lessee		Balance amount to be paid by lessee	
					From	To		Year	Amount	Year	Amount

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GHASIPURA

Format-B (Status of Validity of EC/CTO/CTE (In case of settled sources))

Sl. No.	Name of the Tahasil	Name of the RI Circle	Name of the Source	Validity of EC		Validity of CTO		Validity of CTE	
				From	To	From	To	From	To

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Format-C (Sources which are not put to auction. ~~over~~) - 13 -

Sl No	Name of the Tahasil	Name of RI circle	Name of the source	MGQ Approved(Y/N)	Addl Charge Approved(Y/N)	Current Status		Remarks
						MP Approved(Y/N)	Whether EC is applied by Competent Authority(Y/N)	

Format-D (Sources which are under Process of Auction)

Sl No.	Name of the Tahasil	Name of RI Circle	Name of the Source	Date of Advertisement	Date fixed for Auction	Whether EC is applied by Competent Authority(Y/N)	Whether bidder finalized (Y/N)	Remarks

C. All court cases of different courts are to be transferred with information in the following format and Collectors are requested to inform the Courts through Advocate General, Odisha & Govt Pleader to substitute the Opposite Party(s)

Sl No	Name of the Tahasil	Case No	PWC (Y/N)	submitted	Counter filed(Y/N)	affidavit	Disposed off(Y/N)

D. A proper register for pending court cases has to be maintained by the Tahasildar concerned. The register should contain the basic fact of each source & information about Court cases for future reference purpose.

E. The fact sheet of each minor mineral source to be transferred and pending court cases has to be shared with the Officer concerned who receives the Case Record under intimation to Collector

F. The sources which are transferred are to be reflected in Permanent Sairat Register duly signed by the Tahasildar concerned mentioning letter No. & date of such transfer.

G. The total source list as per DSR needs to be shared with in the following format and a copy of the approved DSR containing all the source list of the District may be furnished to the Mining Officer/ Deputy Director of Mines.

TH
officer
20/10/14
TAHASILDAR
GHASIPURA

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Abstract of sources transferred

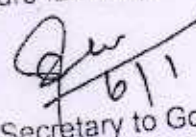
Sl. No.	Name of the Tahasil	No. of sources listed as per the DSR				No. of sources transferred out of the sources listed in the DSR								
		Sand	Stone	Morrum	Others	Total	Sand	Stone	Morrum	Others	Total			

- H. Both hard and soft copies of the information regarding sources in above formats may be kept in Tahasil office and shared with concerned Revenue Inspectors, who in turn will update the Register of RI meant for sairat sources.
- I. The Extinction of sources, if any none should be reflected in the DSR copy before sharing with the Mining Officers/ DDM
- J. The amount of Govt dues collected/ to be collected during the transition phase shall be deposited in the existing Head of Account of Government i.e. "0853-102-0217-02021"
0853-Non-Ferrous Mining & Metallurgical Industries-102-Mineral Concession Fees, Rents and Royalties-0217-Receipts under Odisha Minor Minerals Concession Rules-02021-Collection of Fees, Rents and Royalty.
- K. Tahasildars/ Addl Tahasildars will continue to perform the duties of Executive Magistrates as and when requisitioned by the field officers of the Steel and Mines Department for enforcement activities.
- L. Transfer of all sources should be completed by 31 03 2023.

TTC
07/01/23

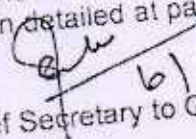
TAHASILDAR
GHASIPURA

Yours faithfully,


 Additional Chief Secretary to Government

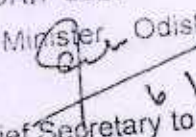
Memo No. **884** /R&DM, dated **06 JAN 2023**

Copy forwarded to Addl Chief Secretary to Government, Steel & Mines Department with a request to issue suitable instruction to the Mining Officers/ DDMs to take over the sairat sources as per the agreed action plan detailed at para 4(A).


 Additional Chief Secretary to Government

Memo No. **885** /R&DM, dated **06 JAN 2023**

Copy forwarded to the Special Secretary to Chief Minister, Odisha for kind information of Hon'ble Chief Minister, Odisha.


 Additional Chief Secretary to Government

Memo No 886 /R&DM dated 06 JAN 2023
 Copy forwarded to the P S to Minister, Revenue & D.M. for kind information of Hon'ble Minister, Revenue & D.M.
 Special Secretary to Government 6/1/23

Memo No 887 /R&DM, dated 06 JAN 2023
 Copy forwarded to the OSD to Chief Secretary, Odisha for kind information of Chief Secretary, Odisha
 Special Secretary to Government 6/1/23

Memo No 888 /R&DM, dated 06 JAN 2023
 Copy forwarded to Directorate, Minor Minerals, Odisha for information and necessary action
 Special Secretary to Government 6/1/23

Memo No 889 /R&DM, dated 06 JAN 2023
 Copy forwarded to Board of Revenue, Odisha, Cuttack All RDCs for information and necessary action.
 Special Secretary to Government 6/1/23

Memo No 890 /R&DM, dated 06 JAN 2023
 Copy forwarded to all ADMs/ Sub-Collectors/ Tahasildars for information and necessary action.
 Special Secretary to Government 6/1/23

TC
 GHASIPURA
 06/01/23
 TAHSILDAR
 GHASIPURA