

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH AT CHENNAI**

ORIGINAL APPLICATION NO. 22 of 2025

IN THE MATTER OF:

1. VADTHYAVATH MUNYA,

S/o V. Dudiya,
Aged about 37 years,
No.6-1, Pochammagadda Thanda,
Chedurpally Village,
Veldanda Mandal,
Nagarkurnool District,
Telangana – 509360
stanly.adv@gmail.com, 9940178702

2. KON REDDY RAMASWAMI,

S/o. K. Viraya,
Aged about 45 years,
No.1-66, Chedurpally Village,
Veldanda Mandal, Nagarkurnool District,
Telangana – 509360
stanly.adv@gmail.com, 9940178702

... APPLICANTS

-//VERSUS//-

1. THE DISTRICT COLLECTOR & DISTRICT MAGISTRATE,

Nagarkurnool District,
IDOC, Kollapur X-Road, Nagarkurnool
Telangana-518002
Email id.collector-ngkl@telangana@gov.in
Phone No.9100901425.

2. IRRIGATION AND CAD DEPARTMENT,

Through the Chief Engineer,
JalaSoudha, Erram Manzil Colony,
Punjagutta, Hyderabad, Telangana 500082.
encawto@gmail.com, 040-23391134

**3. STATE ENVIRONMENT IMPACT ASSESSMENT AUTHORITY,
TELANGANA,**

Through the Chairman, A-3,
Industrial Estate, Sanatnagar,
Hyderabad, Telangana-500018

For SRI SAI MINES AND MINERALS

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Number of Corrections: Nil
Initial:


Proprietor

ms.sciaa.tq@gmail.com.

**4. DEPARTMENT OF MINES AND GEOLOGY,
TELANGANA,**

Through its Director,
My Home Sarovar Plaza, H.No. 5-922,
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040-23221766

5. TELANGANA STATE POLLUTION CONTROL BOARD,

Rep. By its Member Secretary A-3,
Paryavaran Bhavan Sanath Nagar,
Industrial Estate Hyderabad-500018
Mail: ms-tspcb@telangana.gov.in,
Mobile:040-23887600

6. SRI SAI MINE AND MINERALS,

Rep. by Shri.Sanjeev Kumar Vavilla,
9-32 Gandhinagar,
Kalwakurthy Village,
Veldanda Mandal,
Nagarkurnool district,
Telangana-509324.

... RESPONDENTS

COUNTER AFFIDAVIT FILED BY THE 6TH RESPONDENT

I, Vavilla Sanjiv Kumar, aged about 44 years, son of Late Vavilla Balaswamy residing at 9-32 Gandhinagar, Kalwakurthy Village, Veldanda Mandal, Nagarkurnool district, Telangana-509324, having temporarily come down to Chennai, do hereby solemnly affirm and sincerely state as follows:

1. I submit that, I am the Proprietor of M/s. Sri Sai Mine and Minerals, the 6th Respondent herein as such I am well acquainted with the facts and circumstances of the case and capable of swearing this affidavit.
2. I submit that, I hereby deny all the allegations and averments made in the application as misleading, incorrect, factually untenable and

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Initial:

For SRI SAI MINES AND MINERALS



Proprietor

legally unsustainable except those that are expressly and specifically admitted hereunder. The Applicants are put to strict proof for each and every allegation made therein.

3. I submit that the present application is based on unsubstantiated allegations, conjectures, and surmises, unsupported by any cogent material and contrary to official inspection reports without disclosing any specific cause of action. The Applicants have failed to demonstrate any direct or indirect impact on themselves or the environment due to the 6th Respondent's project.
4. I submit that the application is an attempt to undermine the statutory processes and clearances granted by competent authorities after rigorous evaluation.
5. I submit that the instant application has been filed to direct the 5th Respondent to withdraw the environment clearance granted to the 6th Respondent herein, initiate penal action and impose environmental compensation including restitution of the environment on 6th respondent as well as to direct penal action and enquiry against the responsible officers of State Environment Impact Assessment Authority (SEIAA), Telangana for failing to discharge their statutory duties amongst others.

I. STATUTORY CLEARANCES

6. I submit that the 6th Respondent has obtained Environmental Clearance (EC) from the State Environment Impact Assessment Authority (SEIAA), Ministry of Environment, Forest and Climate Change (MoEF&CC), Telangana, bearing EC Identification No. EC23BO01TG139895, dated 17.02.2023 (**Annexure No.: VIII**).
7. I further submit that the 6th respondent has obtained:

- a. Consent for Establishment (CFE) from the 5th Respondent to establish Quarry of Quartz and Feldspar over an extent of 4.047 Hectares *vide* Order No.1075-MBNR/TSPCB/ZO-HYD/2023 dated 25.04.2023 (**Annexure No.: IX**) and
- b. Consent for Operations (CFO) from the 5th Respondent, *vide* Order No.1075-MBNR/TSPCB/ZO-HYD/CFO/2023 dated 25.04.2023 to operate industrial plant and to discharge effluents from the outlets and the quantity of emissions per hour from the chimneys as per the prescribed measurements. The Consent for Operations (CFO) remains valid until 28.02.2028. (**Annexure No.: X**)
8. I submit that 6th Respondent was accorded Quarry Lease for Quartz and Feldspar over an extent of 4.047 Hectares in survey No. 76 of Chedurupalli Village, Veldanda Mandal Nagarkurnool District over a period of 20 years *vide* order dated 30.05.2023 for a period of 03.06.2023 to 02.06.2043 and the lease deed was executed in favour of M/s. Sri Sai Mines and Minerals, the 6th Respondent herein in Proceedings No.1929/QL/2016 dated 03.06.2023 of the Director of Mines and Geology, Government of Telangana, the 4th Respondent herein (**Annexure No.: XI**). It is further submitted that in the Writ Petition in W.P.No.:26300 of 2022 filed by one Mr. C. Sashikumar, the Hon'ble High Court of Telangana directed the Government to dispose the Revision Petitions pending on its file and further directed the Director of Mines and Geology, Hyderabad not to take further steps to grant Quarry Lease in favour of third parties till the disposal of the Revision petition.
9. I further submit that in compliance of the Hon'ble High Court orders, the Department of Mines and Geology, the 4th Respondent herein, *vide* Proceedings No.12583/R2-3/2021 dated 06.06.2023 has withdrawn the grant of lease deed accorded to M/s. Sri Sai Mines and Minerals, the 6th Respondent herein. Subsequently, the 6th Respondent has filed

revision application before Principal Secretary, Mines Department, Govt. of Telangana against the withdrawal of the grant order. Therefore, the 6th Respondent herein had not commenced any operations in the quarry lease granted and withdrawn area at the time this instant application was filed before this Hon'ble Tribunal.

10. I submit that the 5th Respondent Telangana State Pollution Control Board had inspected the area on 21.02.2025 and has filed a report (**Annexure No.: XII**) dated 22.02.2025 before this Hon'ble Tribunal in which they have clearly stated that,

"M/s. Sri Sai Mine and Minerals (Respondent No. 6) had not commenced any quarry operations, nor had they initiated any developmental activities at the site."

11. I submit that, the Industries & Commerce (Mines.I) Department, Government of Telangana, *vide* Memo No.4475/M.I(2)/2023 (**Annexure No.:XIII**) dated 04.12.2025, allowed the 6th Respondent's revision petition under Rule 35-A Telangana Minor Mineral Concession Rules, 1966 [*as amended*] against Department of Mines and Geology's withdrawal order dated 06.06.2023, and restored the quarry lease for Quartz/Feldspar in Survey No.76 in favour of the 6th Respondent. The 6th Respondent's petition was allowed applying Ministry of Mines clarification dated 24.09.2025 on pre-20.02.2025 Letters of Intent. The other revision petitions of Mr. C. Shashi Kumar and Mr. Vinay Raj Industries are dismissed as withdrawn. The Government directed only rectification of breaches, if any, before operations, confirming the legality of the lease accorded to the 6th Respondent herein on 03.06.2023.

12. I submit that implementing the above Government order, the Director of Mines & Geology issued Memo No.12583/R2-3/2016 dated 18.12.2025 (**Annexure No.:XIV**) directing Assistant Director of Mines & Geology, Nagarkurnool to create lessee login, finalise Mine Revenue

Assessment from lease deed date, identify and rectify breaches if any, and permit operations thereby operationalising the restored lease.

13. I submit that, the Assistant Director of Mines & Geology, Nagarkurnool complied *vide* letter No.1929/QL/2016 dated 23.12.2025(**Annexure No.:XV**) , reporting no breach of lease conditions and confirmed the validity of scrutinised quarry plan approved by the Department of Mines and Geology *vide* Lr.no.627/QP/NGKL/2022 dated 21.04.2022, the Environmental Clearance issued by the State Environment Impact Assessment Authority (SEIAA), Telangana, Consent for Establishment and Consent for Operations issued by the Pollution Control Board, Hyderabad and quantified the lessee dues up to 31.12.2025 recommending lessee login creation. I further submit that the 6th Respondent promptly cleared the flagged dues regularising the dues in compliance with Department directions (**Annexure Nos.:XVIII and XIX**).

14. I submit that the District Collector Nagarkurnool, the 1st Respondent herein, has filed a comprehensive report (**Annexure No.:XVII**) before this Hon'ble Tribunal responding to the allegations by the Applicants regarding Environmental Clearance violation and Thirupathi Cheruvu encroachment by the 6th Respondent. The main report dated 24.01.2026 compiles six annexures confirming:

- a. Thirupathi Cheruvu is entirely within Survey No.: 69 (34 acres 12 gunthas, recorded as "Shikam Talab") while the 4.047-hectare Quarry Lease occupies Government vacant land classified as 'SARKARI' land in Survey No.: 76
- b. Joint inspection report dated 27.03.2025 by Executive Engineer Irrigation Division No.6 Kalwakurthy, Tahsildar Veldanda, Assistant Executive Engineer Irrigation Veldanda, and Mandal Surveyor establish with Global Positioning System coordinates that the lease boundary exceeds 50 metres from the water body

per additional State Environment Impact Assessment Authority siting guidelines. The operative portion is reproduced as follows:

"8. ...the 'Thirupathi Cheruvu' is located in Survey No.:69 with total extend Ac.(34.12) gts and recorded as 'Shikam Talab' in Revenue records which is adjacent to the subject land of Survey no.:76 and the applicant boundary coordinates are more than 50 metres from the water body and hence the Quarry area located in Survey no.:76 does not come under FTL and buffer Zone."

- c. There are no quarry workings, stock, or labour exist and as such no operations have been commenced in the site and
- d. Confirmed the valid Environmental Clearance dated 17.02.2023, Consent for Establishment dated 25.04.2023, and Consent for Operation dated 25.04.2023 (valid until 28.02.2028).

15. I submit that the supporting documents trace a complete compliance verification:

- a. District Collector Requisition Letter No. D1/355/2025 dated 12.03.2025 directed field enquiries
- b. Executive Engineer Irrigation letter dated 22.04.2025 submitted the 27.03.2025 joint inspection with location maps
- c. Telangana State Pollution Control Board Environmental Engineer letter dated 01.05.2025 confirmed their 21.02.2025 site inspection and found no quarry operations or developmental activities in the project site with Consent for Operation valid until 28.02.2028.
- d. Assistant Director Mines and Geology Letter Number 1929/Quarry Lease/2016 dated 08.05.2025 detailed Letter of Intent dated 31.03.2022, grant dated 30.05.2023 (temporarily withdrawn on 06.06.2023 pending revision), and all statutory clearances.

e. Tahsildar Veldanda requisition dated 09.07.2025 produced report dated 02.08.2025 confirming Survey No.76 having Sarkari land status and buffer zone compliance.

16. I submit that the above mentioned official verifications by Revenue, Irrigation, Mines and Geology, and Pollution Control authorities conclusively establish no encroachment, no Full Tank Level violation, no buffer breach, and no unauthorised operations exist in the project site and therefore Applicants' claims are wholly unsubstantiated.

II. NO ENCROACHMENT OR BUFFERZONE VIOLATION

17. I submit that the minimum distance from the boundary of mine lease area according to the amendment to additional guidelines for processing mining projects by the SEIAA and SEAC, Telangana *vide* notice dated 11.06.2020 in F.No.4/TSPCB/EC/SEIAA/General/2015 should be as follows:

- a. Nearest Human Habitation: 200 mts
- b. Nearest Water Body: 50 mts
- c. Reserve Forest: 50 mts

The notified water body Tank 'Thirupathi Cheruvu' is situated in Survey number 69 with its minimum offset distance to the quarry lease area measuring to be more than 50 mts, which is well above the prescribed limit as per the siting guidelines issued by the SEIAA. The 6th Respondent's documents do not indicate any encroachment upon the notified water body for the quarrying activities. The maps annexed with the Quarry Plan submitted (**Annexure No.: VII**) and duly scrutinised by the 4th Respondent herein do not indicate any encroachment upon the notified water body nor have they suppressed the existence of the said water body in the plan.

18. I submit that the averment in para nos. 3, 4, 5 and 6 of the application that the 6th Respondent has misrepresented facts misleading the

authorities into believing that no water body exists in close proximity to the project site is hereby denied. It is clearly mentioned in para no.1 of the environment clearance granted (**Annexure No.: VIII**) to the 6th Respondent that the 6th Respondent's application for the clearance reported the presence of the water body 'Thirupathi Cheruvu'. The relevant portion is reproduced hereunder:

"It was reported that the nearest human habitation viz., Kalyana wagu Thanda which is existing at a distance of 1.05 km; nearest water body i.e. Thirupathi cheruvu exists at 60m (N); Nearest RF i.e., Bharapur RF exists at 430 m from the mine lease area."

I further submit that the Applicant has not provided a single evidence to show that the 6th Respondent has encroached the mentioned water body.

19. I submit that, the 3rd Respondent, the State Environment Impact Assessment Authority (SEIAA) herein has submitted their report dated 16.06.2025 before this Hon'ble Tribunal (**Annexure - XIII**). In the report they have clearly mentioned that SEAC meticulously scrutinized the proposal across multiple meetings held on 27.05.2022, 11.07.2022, 12.11.2022, and 03.01.2023. During the SEAC meeting held on 12.11.2022, concerns were raised regarding a nearby water body and stream. In response, the 6th Respondent was directed to submit a precise demarcation plan from the Irrigation & Command Area Development (I&CAD) Department to confirm the exact distances. In compliance with the directives, the Executive Engineer, Irrigation Division-6, I&CAD Department, Kalwakurthy, issued a No Objection Certificate (NOC) dated 23.08.2022. In the report submitted by the Engineer, it was confirmed that the said water body (Thirupathi Cheruvu) is situated at a distance beyond 60 meters. This distance significantly exceeds the minimum required buffer of 50 meters from the nearest water body, as mandated by the additional guidelines for mining projects issued by SEIAA & SEAC, Telangana.

Furthermore, the said NOC affirmed that the 6th Respondent's allotted land is free from any FTL (Full Tank Level) boundary and is not traversed by any other water body, thereby dispelling any concerns regarding environmental impact on water sources. Based on the said NOC, the 3rd Respondent had approved the 6th Respondent's project.

- 20.** I submit that the 6th Respondent has not disturbed the waterbody "Thirupati Cheruvu" in any way. The applied Quarry is confined to an elevated place, with no adverse effect anticipated to the water regime. Moreover, the quarrying operations do not generate any toxic effluents. There are no dug wells or open wells in the applied lease area. The water level in the quarry area and its surroundings ranges between 65 to 70 m below ground level with a minimum in the month of August and maximum in the month of May in a year. There will be no seepage as the quarry progresses and also water table will not be intercepted. Thus, there will not be any impact on ground water due to the proposed quarrying activities.
- 21.** I submit that the averments mentioned by the Applicant in para nos. 7, 8, 9, 10, 11 are hereby denied. The 6th Respondent had not commenced any quarrying operations or developmental activities due to reasons discussed above, which is also confirmed via multiple reports submitted by the authorities. So, there is no question of them encroaching the water body to cause any environmental degradation. In this situation the allegation that the 6th Respondent has deliberately altered the scope of the mining site by encroaching upon the water body is unsustainable. They have not violated the provisions of Environment Protection Act, 1986 [*as amended*] and Water (Prevention and Control) Act, 1974 [*as amended*].
- 22.** I submit that the averment mentioned in para no. 14 that the project site consisted of assigned agricultural lands of farmers and 6th Respondent is benefitting at the expense of the poor farmers is here

by denied. The 6th Respondent was awarded the lease area after securing a valid 'No Objection Certificate' from the Tahsildar:

- a. The 6th Respondent applied for the mining lease for 9 Hectares of land in Survey No.:76 of Chedurpally village, Veldanda Mandal. The assignees of the said land wilfully handed over their assigned land in favour of the 6th Respondent as the area is covered with rocky hills making it unfit for cultivation and no assignees cultivated the land. (**Annexure No.: I**, NOC issued in favour of the 6th Respondent *vide* Letter dated 26.04.2016).
- b. The Revenue Divisional Officer (RDO) at the time forwarded the same to the Assistant Director of Mines and Geology for consideration *vide* Letter No. J/4618/2016 dated 13.06.2016 (**Annexure No.: II**).
- c. The 6th Respondent then submitted an affidavit requesting for grant of Quarry lease for over an extent of 4.047 Hectares instead of 9.00 Hectares in the Survey No.:76. Finally the Asst. Director of Mines and Geology, Nagarkurnool recommended for grant of Quarry lease for Quartz and Feldspar over an extent of 4.047 Hectares in favour of M/s. Sri Sai Mines and Minerals, the 6th Respondent herein *vide* Notices dated 25.01.2022 and 31.03.2022 in File No. DMG/60/2021-DMG and Notice No.:12583/R2-3/2021-3 (**Annexures No.: V and VI**). The operative portion is reproduced hereunder:

"... Through the reference 2nd cited, the Assistant Director of Mines Geology, Nagarkurnool has reported that the Revenue Divisional Office Nagarkurnool vide Lr.No. J/4618/2016, dt.13.06.2016 has reported that M Sri Sai Mines and Minerals applied for mining lease over an extent Ac.10.00 gts of Government land and Ac/.13.02 Gts of Assignment lands Sy.No.76 of Chedurpally Village, Veldanda Mandal, with the willing a consent letter and affidavits of

For SRI SAI MINES AND MINERALS



Proprietor

*Assignees as they are agreed to give the land in favour of M/s. Sri Sai Mines and Minerals for mining lease before Tahsildar. Further reported that the Tahsildar has enquired over the matter with adjacent Pattedars and found no remarks against M/s. Sri Mines and Minerals and **the assignees of said land have will fully handed over/lease their assigned land and recommended to for grant of Quarry Lease to an extent of 9.00 Ha. ...***

23. I further submit in the Letter No.A/1048/2025 dated 02.08.2025 by the Tahsildar, Veldanda Mandal which has been annexed by the 1st Respondent [**Annexure no.:XVII**] in their report that the Survey no.76 is classified as Sarkari land and out of which the government vacant land to an extent of 4.047 Ha was sanctioned in favour of the 6th Respondent herein and the remaining extend was recorded in the names of assignees of Chedurpally Village of Veldanda Mandal. The operative portion is reproduced hereunder:

*“In this regard the matter has been got enquired through Mandal Girdhavar and Mandal Surveyor, Veldanda Mandal and on verification of revenue records, it is submitted that the land in Sy.no.76 total extent Ac.39.31 gts situated at Chdurepally Village of Veldanda Mandal is classified as vacant land for which Quarry lease for Quartz and Feldspar over an extent of 4.047 Hects (Ac. 10-00 gts) was **sanctioned in favour of M/s. Sri Sai Mines and Minerals, Rep by its Mg.partner Sri. V. Sanjeev kumar vide Asst. Director (Mines & Geology), Nagarkurnool Proc.No.1929/Quarry Lease/2016 dated 03.06.2023 and the remaining extend was recorded in the names of assignees of Chedurpally Village of Veldanda Mandal.**”*

24. I further submit that therefore, it is clearly established that there is no question of the land being accorded without relinquishment or cancellation of pattas. It is denied that the project proponent is benefitting at the expense of the poor farmers who are presently

cultivating the lands for their livelihood. The Applicants have not provided any evidence to show that they are impacted by the decision nor have any of the farmers been arrayed as parties in the application. The Applicants have filed this application with vested interests known only to them and have not approached this Hon'ble Tribunal with clean hands.

25. I further submit that any grievance regarding land assignment, patta validity, or title disputes raised by Applicants falls outside the Hon'ble National Green Tribunal's environmental mandate. All competent public authorities – District Collector, Tahsildar Veldanda, Revenue Divisional Officer Kalwakurthy, and Assistant Director Mines and Geology Nagarkurnool – have independently verified Survey Number 76 as Sarkari land with the lease portion as Government vacant land per official records leaving no environmental land-use violation for adjudication here.

26. I submit that the 6th Respondent's project was issued Environmental Clearance (EC) under the category B2 as per the Environment Impact Assessment Notification, 2006 [as amended]. B2 projects are specifically exempted from mandatory public consultation as they are projects deemed to have minimal environmental impact. Consequently, there is no mandatory requirement for newspaper publication for the purpose of public consultation before the EC is granted for a B2 project. I further submit that the Environment Clearance obtained has been uploaded in 'Parivesh Portal' in public domain with open access.

III. APPLICATION BARRED BY LIMITATION AND JURISDICTION

27. I submit that the 6th Respondent have not concealed any factual data to invoke the Specific condition nos. VII, VIII, XI or General condition nos. 25 43 and 44 of the Environmental Clearance. It is clearly established that the 6th Respondent have not even begun their

quarrying operations nor have they initiated any development activities to alter the scope of the clearance accorded to invoke the condition no. 25. They have also not encroached the water body. In the scrutinized quarry plan submitted by the 6th Respondent [**Annexure No.: VII**] does not conceal the presence of the cited water body. It is also shown in the drawings of the quarry plan that quarry lease area is situated at the minimum distance mandated by the siting guidelines of the SEIAA [**Annexure No.: VII, Plate IX**].

- 28.** I submit that the Applicants have specified that the instant application has been filed under sections 14 and 15 of the National Green Tribunal Act, 2010 [*as amended*] invoking original jurisdiction. It is pertinent to mention that the Applicants have not mentioned any specific cause of action whatsoever for the Tribunal to entertain the applications under the aforementioned sections. The Applicants have failed to prove any demonstrable breach of environmental laws or regulations that has directly or indirectly impacted the Applicants or the environment. The Applicants have failed to establish any direct link between an alleged activity and environmental damage or violation. The Application does not raise a substantial question relating to the environment. All that the Applicants have mentioned are bald allegations without any material evidence to support the same. The Application has been filed without any genuine environmental concern, with a collateral motive. Therefore, the application is liable to be dismissed for not having any discernible cause of action.
- 29.** I further submit that there is no question of a continuing cause of action as claimed by the Applicant here because the 6th Respondent has not commenced any quarry operations or development activities in the lease area. The Applicants have neither clearly stated any cause of action nor have they provided any evidence of a continuing cause of action.

- 30.** I submit that, the Applicants' primary relief prayed is to direct the 5th Respondent Telangana State Pollution Control Board to withdraw the environment clearance. Any appeal against the environment clearance granted can only lie under the Section 16 of the National Green Tribunal Act, 2010 [*as amended*] in the appellate jurisdiction and not under the aforementioned sections invoking original jurisdiction.
- 31.** I submit that the Applicants have conveniently not mentioned when they received the communication of the grant of environment clearance to calculate the period of limitation. The environmental clearance was granted to 6th Respondent *vide* order dated 17.02.2023 as mentioned above. This instant original application was filed on 23.01.2025 which is after **702 days** from the date of environmental clearance.
- 32.** I submit therefore, the application is barred by limitation under Section 16 of the National Green Tribunal Act, 2010 [*as amended*]. Any appeal against an Environmental Clearance shall lie within a period of 30 days as prescribed by the act. It has been consistently held by this Hon'ble Tribunal that the limitation period prescribed in Section 16 is mandatory and jurisdictional. This means that if an appeal/application is filed beyond the maximum period of 90 days (30 days original + 60 days condonable), the Tribunal loses jurisdiction to entertain it. And the Tribunal does not have the power to condone delay beyond the total period of 90 days.
- 33.** I further submit that, it has been held in many Supreme Court Judgements that if a special statute prescribes a period of limitation for filing an appeal or an application and also provides for condonation of delay for a fixed, maximum period, then the Tribunal/Court cannot condone the delay beyond that fixed maximum period. Therefore, it is established that this application is barred by limitation and liable to be set aside.

34. I further submit that in various Supreme Court, High Court and this Hon'ble Tribunal judgements, it has been held that a valid Environment Clearance granted to a compliant project should not be lightly set aside, especially on unsubstantiated grounds.

For the reasons aforementioned, it is humbly submitted that the Original Application No.22 of 2025 filed by the Applicants is devoid of merit, lacks any factual or legal basis, and is an abuse of the process of this Hon'ble Tribunal. The allegations are unsupported by evidence, and the Sixth Respondent has demonstrated strict compliance with all statutory norms and environmental clearance conditions. Therefore, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

- a. Dismiss the present Original Application with exemplary costs against the Applicants; and
- b. Pass any other order or direction as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case and thus render justice.

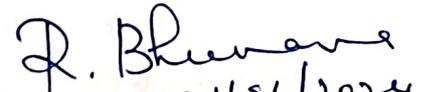
For SRI SAI MINES AND MINERALS


Proprietor

AFFIANT

**Solemnly affirmed at Chennai
This the 7th day of March, 2026,
After reading the contents of
This affidavit to me and explaining
The contents in English and finding
them to be correct affixed
my signature herein**

Before me,


MS 1696/2024

Advocate, Chennai.

[R. BHUVANA]
420, NALC, MHE, CHENNAI

**BEFORE THE HON'BLE
NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH AT
CHENNAI**

**ORIGINAL APPLICATION NO. 22
of 2025**

IN THE MATTER OF:

1. VADTHYAVATH MUNYA,
2. KON REDDY RAMASWAMI,

... APPLICANTS

-//VERSUS//-

1. THE DISTRICT COLLECTOR,
2. IRRIGATION AND CAD DEPARTMENT,
3. SEIAA, TELANGANA,
4. DM & GEOLOGY, TELANGANA,
5. TELANGANA SPCB,
6. SRI SAI MINE AND MINERALS,

... RESPONDENTS

**COUNTER AFFIDAVIT FILED BY
THE 6TH RESPONDENT**

**S.HAJA MOHIDEEN GISTHI
COUNSEL FOR THE 6TH
RESPONDENT
Ph:8015744551**