

Filed on 09.07.2025

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (SZ)
CHENNAI**

MEMORANDUM OF APPLICATION

(Under Section 18(1) read with Sections 14, 15 of National Green Tribunal
Act 2010)

Application No. 87 of 2025

BETWEEN

Venugopal Reddy, V.O
& 3 Others

... Applicants

Versus

The Principal Secretary,
Mines and Minerals Department, AP
& 8 Others

... Respondents

M/s. P. Subba Reddy (MS/198/1975)
T. Srikrishna Bhagavat (MS/3412/2014)
N.C.Thirumalai Balaji (MS/2630/2018)
P.Shiyal Nath (MS/2069/2022)

COUNSEL FOR THE APPLICANT
No.160, Thambu Chetty Street, Parrys, Chennai – 600 001.
Email: shiyalnath@gmail.com
Mobile No: +91-9884784646

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (SZ)
CHENNAI**

MEMORANDUM OF APPLICATION

(Under Section 18(1) read with Sections 14, 15 of National Green Tribunal Act 2010)

Application No. 87 of 2025

BETWEEN

Venugopal Reddy V.O
& 3 Others

... Applicants

Versus

The Principal Secretary,
Mines and Minerals Department, AP
& 8 Others

...Respondents

PAPERBOOK

| S. No. | Date | Description | Page No. |
|--------|-----------------------------|---|----------|
| 1. | 07.07.2025 | Additional Affidavit filed by Applicant V.O. Venugopal Reddy | 1-5 |
| 2. | Feb-2010 To Jun- 2025 | ANNEXURE A11: Satellite Image detailing the distance between Mining- Waste Dump - Plantation | 6-11 |
| 3. | 03.01.2011 | ANNEXURE A12: Representation by Villagers (Applicants)to District Collector | 12-14 |
| 4. | 03.01.2011 | Translation of Representation by Villagers (Applicants)to District Collector from Telugu To English | i |

Certified that copies of the above documents are true copies of their respective originals

Dated at Chennai on this 09th day of July 2025

COUNSEL FOR THE APPLICANT

No.160, Thambu Chetty Street, Parrys, Chennai – 600 001.

Email: shiyalnath@gmail.com

Mobile No: +91-9884784646

(1)

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (SZ)
CHENNAI**

Application No. 87 of 2025

BETWEEN

Venugopal Reddy, V.O
& 3 Others

...Petitioners/Applicants

Versus

The Principal Secretary,
Mines and Minerals Department, AP
& 8 Others

...Respondents/Respondents

ADDITIONAL AFFIDAVIT FILED BY APPLICANT V.O. VENUGOPAL REDDY

I, Mr. V.O. Venugopal Reddy, S/o. Krishna Reddy, Hindu, aged about 57 years, residing at Old No: 6-8-1194, New No: 76, K.T. Road, Tirupathi – 517 501, do hereby solemnly affirm and sincerely state as follows,

1. I humbly submit that I am the 1st Petitioner herein and the 1st Applicant in the above suit and as such I am well aware of the facts and circumstances of this case and also I am filing this Affidavit on behalf of the other 3 Petitioners/Applicants as well. The Plaint averment may be read as part and parcel of this Affidavit.
2. I submit that, myself and the other Petitioners/Applicants own Agriculture lands situated at Korlakunta Village in Survey No's. 999/5, 289, 290/3, 291-14, 298/A2, 298/1, 299/A1, 290/1A, 298/2B, 298/1A1 to an extent of 48 Acres, purchased by us jointly in the year 2002 & 2003 and invested huge sums to develop the said lands by

V.O. Venugopal Reddy

planting Mango & Teakwood Plantation in the year 2003 in order to have good returns.

3. I submit that, Government of Andhra Pradesh, through their mining Department was already in operation of mining activities adjacent to our lands or extraction of Barytes (or) Barium sulfate which were all licensed lands and the excavated dust extracts of the entire mining activity were stored on heavy quantities on the nearby lands at Korlakunta Panchayat (survey number 317 - graze ground lands, non-mining licensed lands). Entire mining activity is only in Mangampet Panchayat. But, the extract was dumped in Korlakunta Panchayat in the graze ground lands illegally.
4. I further submit that, due to the mining activity the Petitioner/Applicants herein had incurred heavy loss due to the air and dust pollution caused by such mining activities. Dust is the main cause to pollute the plantations, further the heat generated from the mining activities, dumping and heavy smoke polluted the entire area and the plantation.
5. I submit that, the mining activity and the dumping of waste in the nearby grazing land near the plantation S.No.317 (graze grounds) was done by violating guidelines laid down per Environmental Laws regarding Air and Water Pollution. Further, the Respondents are liable to compensate for the losses incurred to the nearby land owners as the plantation crops died only due to the dust pollution and lack of water. The applicants suffered financially to the tune of several lakhs as they did not get any returns from the land where the trees were planted.

V.O. - [Signature]

6. I submit that, with the above facts the Petitioner/Applicant has filed a petition before this Hon'ble Tribunal seeking relief in terms of directing to form an expert committee to investigate the loss of plantation and provide financial compensation, to stop and take appropriate measures against the ongoing mining activity, review issued NOC and approvals and stop dumping activities at Korlakunta Panchayat.
7. I further submit that, when the case came up for hearing with regard to the maintainability of the application, the Hon'ble Tribunal raised the following queries and the respective response is provided by the Petitioner/Applicant as detailed below,
- a) when the mining activity did started, which company is doing the mining extract? Since when?

Response by Petitioner/Applicant:

- M/s. Andhra Pradesh Mineral Development Corporation (APMDC) Limited, the State Government entity is operating Mangampet Barytes Project since year 1978 in Mangampeta & Govindampalli Villages, Obulavaripalli Mandal, YSR Kadapa District, Andhra Pradesh,
- Thriveni Earthmovers Pvt Ltd. is a diversified mine developer with operations and projects in India, Indonesia and Africa, they started mining operations in the Mangampet Barytes Mines in 2015, according to the company's website

V. V. V. V. V.

b) What is the exact distance between the mining area and the plantation?

Response by Petitioner/Applicant: The exact distance between the mining area and the plantation is **2.20 Km**. Satellite pictures detailing the distance are enclosed for reference. **Refer Annexure A11- 6 To 11.**

c) When did the dumping of the mining waste begin in the grazing land? Was it before or after purchase of the plantation? Exact dates will be helpful.

Response by Petitioner/Applicant: Dumping of waste from the mining activity in the grazing land started after purchase of the said properties, the properties was purchased in the year 2003 and the dumping in Survey No.317 gracing land started in the year 2010. The illegal dumping of mining waste in gracing land and the impact it had on the plantation and village was sent as a representation to “The District Collector, Kadapa District” in the year 2011 by all the village people and the Petitioners/Applicants as well. **Refer Annexure A12 -12 To 14**

d) What is the exact distance between the dumping of mining waste – grazing area and the plantation?

Response by Petitioner/Applicant: The below table depicts the details

| S. No. | Date | Distance between the Waste Dump & Plantation | Reference |
|--------|----------|--|----------------|
| 1. | Feb-2010 | 460 meters | Annexure A11-6 |
| 2. | Mar-2013 | 132 meters | Annexure A11-7 |
| 3. | Jul-2016 | 100 meters | Annexure A11-8 |

V.O. M...

5

| | | | |
|----|-----------|-----------|-----------------|
| 4. | Sept-2018 | 90 meters | Annexure A11-9 |
| 5. | Dec-2023 | 40 meters | Annexure A11-10 |
| 6. | Jun-2025 | 40 meters | Annexure A11-11 |

e) When did the damage to the plantation started, from which year and what action/complaints was given by you to rectify the same.

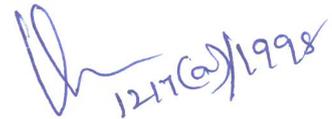
Response by Petitioner/Applicant: The Damage to the Plantation started after COVID -19, when the waste dump of mining reached as close as 40 (**refer Annexure A11-10 and A11-11**) meters from the plantation and the Government officials did not take any action to stop the violation, subsequently, a Legal notices has been sent across to all the respective Government authorities on 06.11.2023.

It is therefore prayed that this Hon'ble Court may be pleased to receive the additional documents on behalf of the Applicants side to mark further documents and allow the above application and proceed with the trial and thus render justice.

Solemnly affirmed at Chennai
on this the day of July 2025
and signed his name in my
presence.

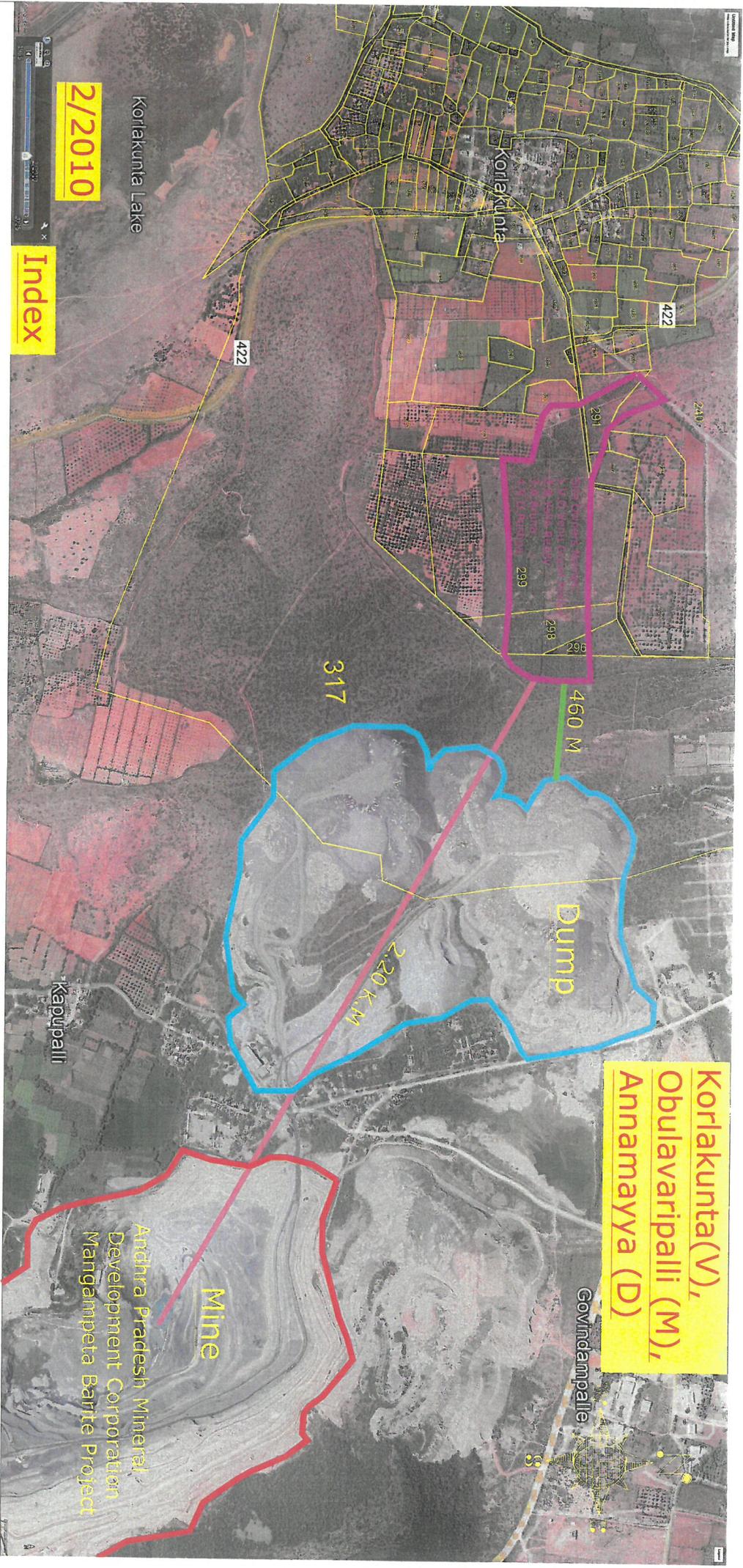


BEFORE ME

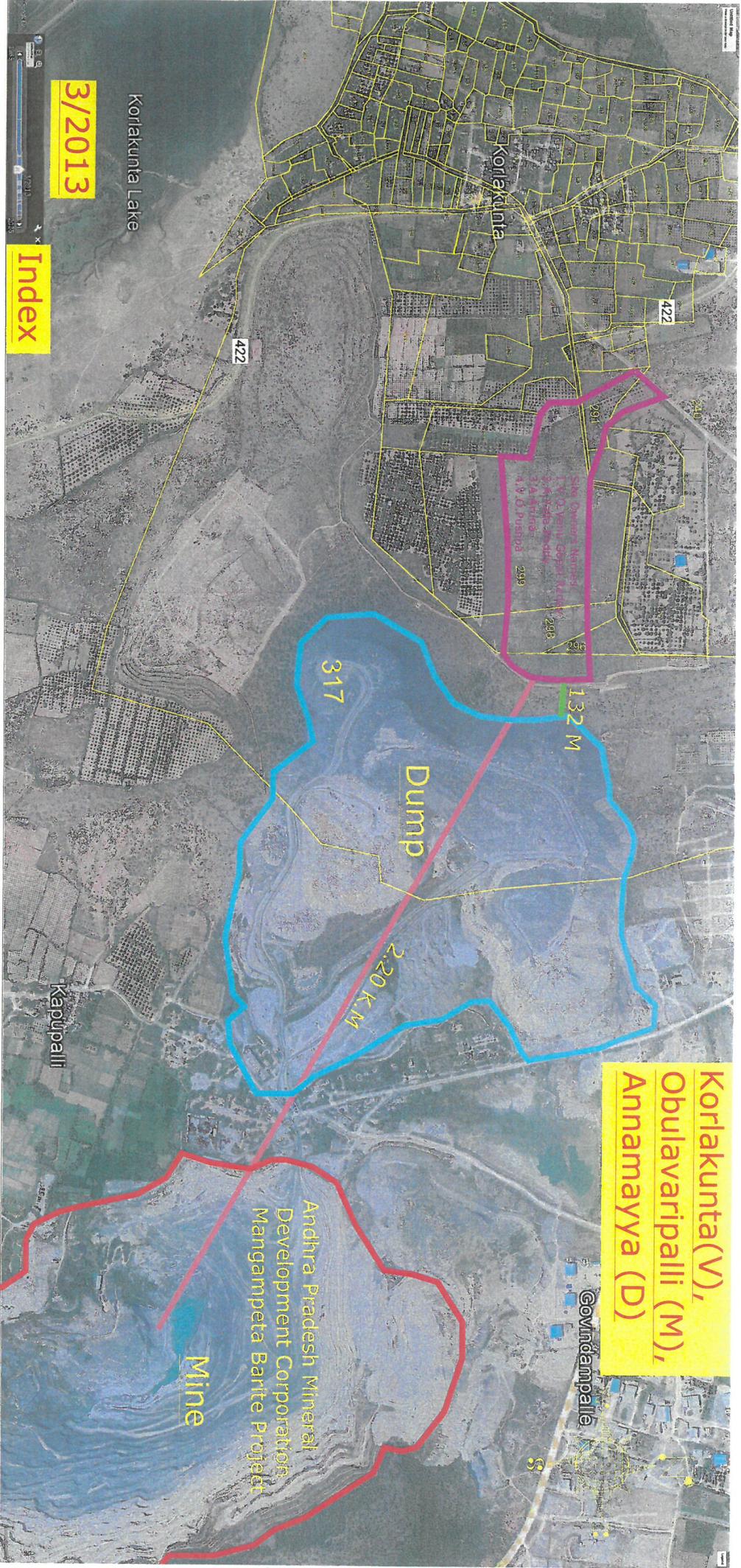


ADVOCATE: CHENNAI.

A11-6



- Dump Boundary (Latitude:14.026216, Longitude:79.305077) — Site Boundary (Latitude:14.033722, Longitude:79.297829)
 - Sy.No: 317
 - Mine Boundary (Latitude:14.025765, Longitude:79.320809)
 - Note :- 1.Site Boundary to Dump Distance :300 Meters
 - 2.Site Boundary to Mine Distance : 2.20 Kilometers
- P. Ramesh Kumar*
P. RAMA KRISHNA
LICENSED SURVEYOR
L.S. No. 2668
Obulavaripalli, Mandali, Kadapa Dt.

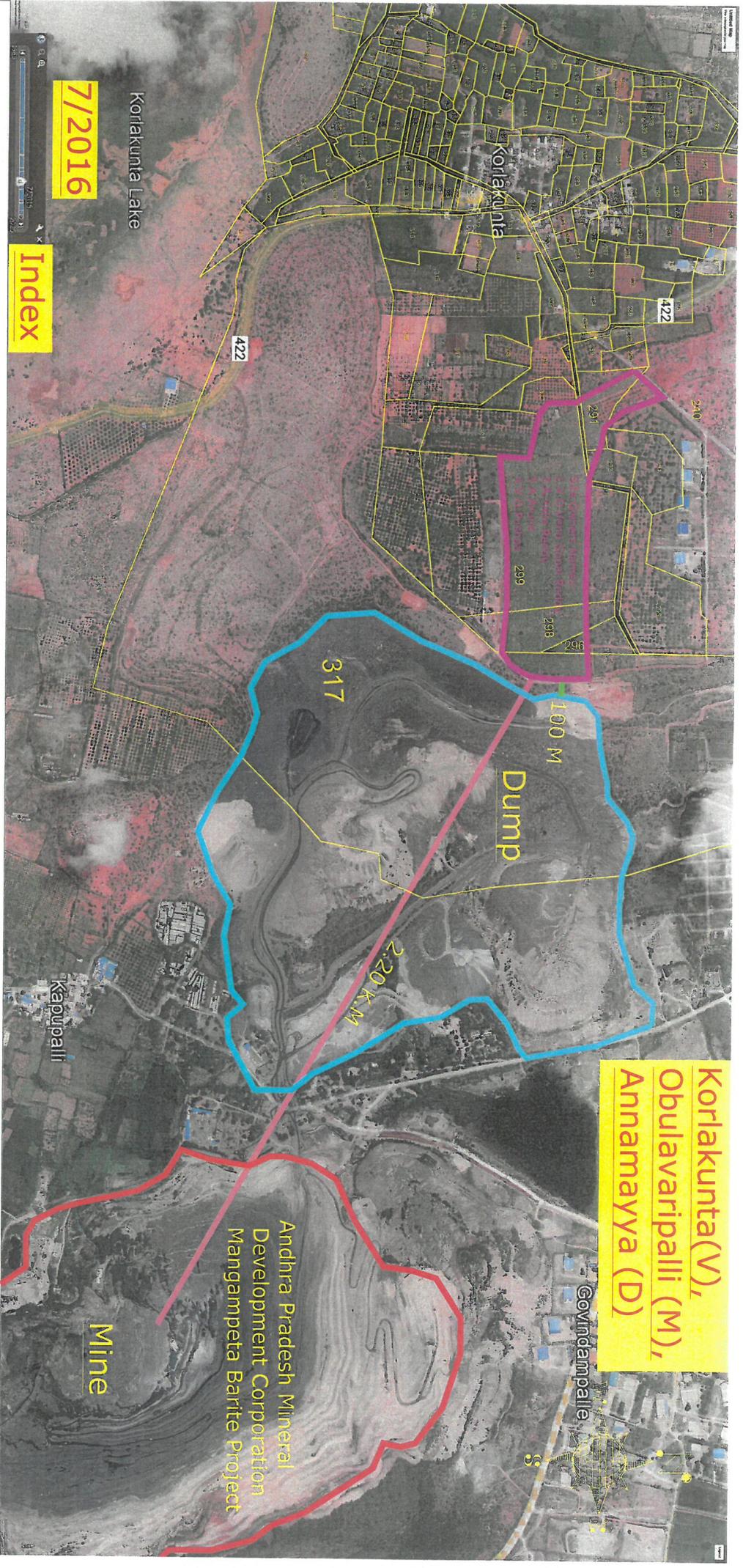


— Dump Boundary (Latitude:14.026216, Longitude:79.305077)
 — Site Boundary (Latitude:14.033722, Longitude:79.297829)
 Sy.No: 317
— Mine Boundary (Latitude:14.025765, Longitude:79.320809)
 Note :- 1.Site Boundary to Dump Distance :132 Meters
 2.Site Boundary to Mine Distance : 2.20 Kilometers

- Site Owners Names:
- 1.V.O.Venu Gopal Reddy
 - 2.A.Yalla Reddy
 - 3.A.Aruna
 - 4.V.O.Pushpa

P. Ramakrishna Reddy
 P. RAMA KRISHNA
 LICENSED SURVEYOR
 L.S. No. 26553
 Obulavaripalli Mandal, Kadapa Dist.

A11-8



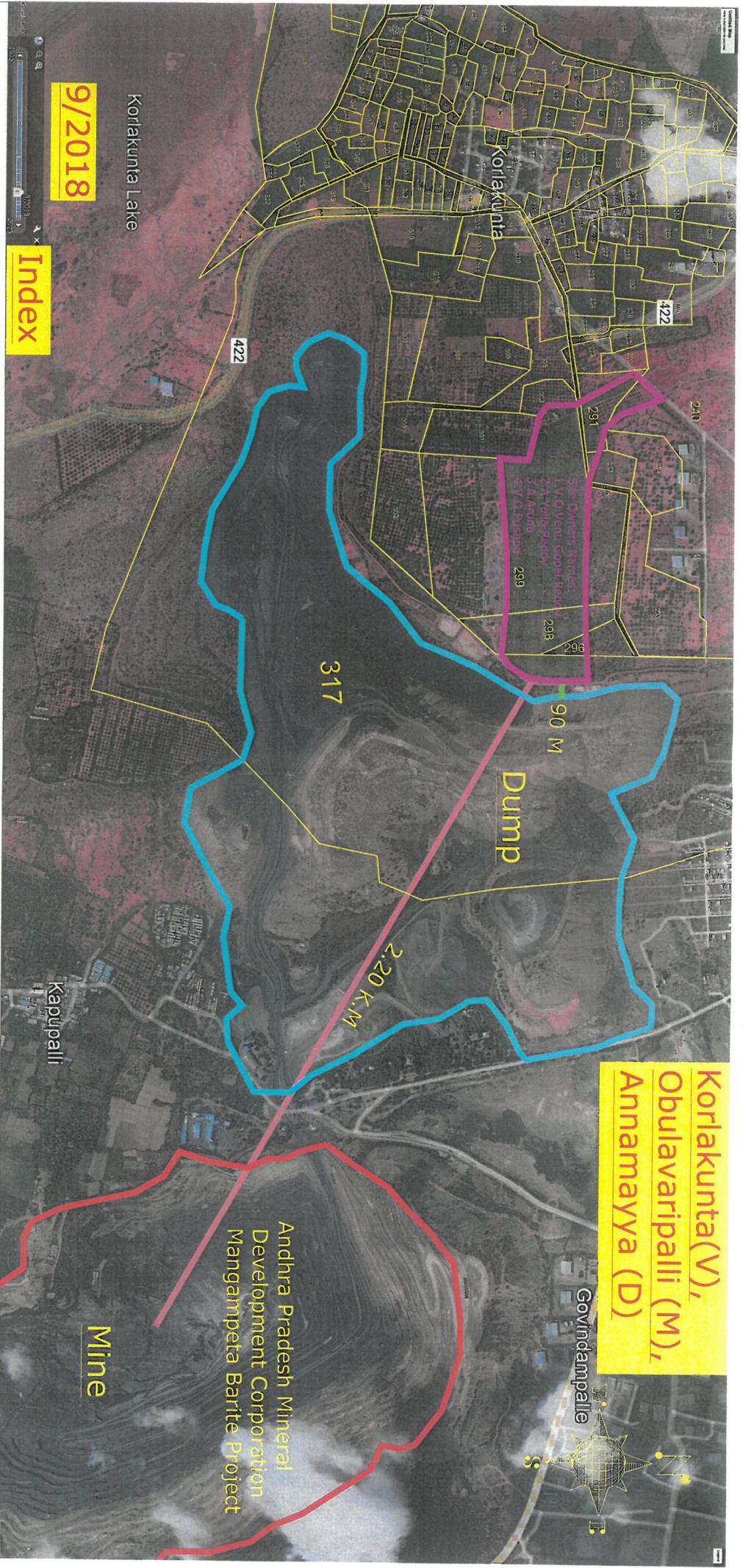
**Korlakunta (V),
Obulavaripalli (M),
Annamayya (D)**

**Andhra Pradesh Mineral
Development Corporation
Mangampeta Barite Project**

- Site Boundary (Latitude: 14.033722, Longitude: 79.297829)
 - Dump Boundary (Latitude: 14.026216, Longitude: 79.305077)
 - Mine Boundary (Latitude: 14.025765, Longitude: 79.320809)
- Site Owners Names:**
- 1. V.O.Venu Gopal Reddy
 - 2. A.Yalla Reddy
 - 3. A.Aruna
 - 4. V.O.Pushpa
- Note :-**
- 1. Site Boundary to Dump Distance : 100 Meters
 - 2. Site Boundary to Mine Distance : 2.20 Kilometers

P. Ramkrishna 29/1/25
P. RAMA KRISHNA
LICENSED SURVEYOR
L.S. No. 2668
Obulavaripalli, Kadapa Dt.

A11-9



Korlakunta (V),
 Obulavaripalli (M),
 Annamayya (D)

9/2018

Index

317

Dump

90 M

2.20 K.M

Mine

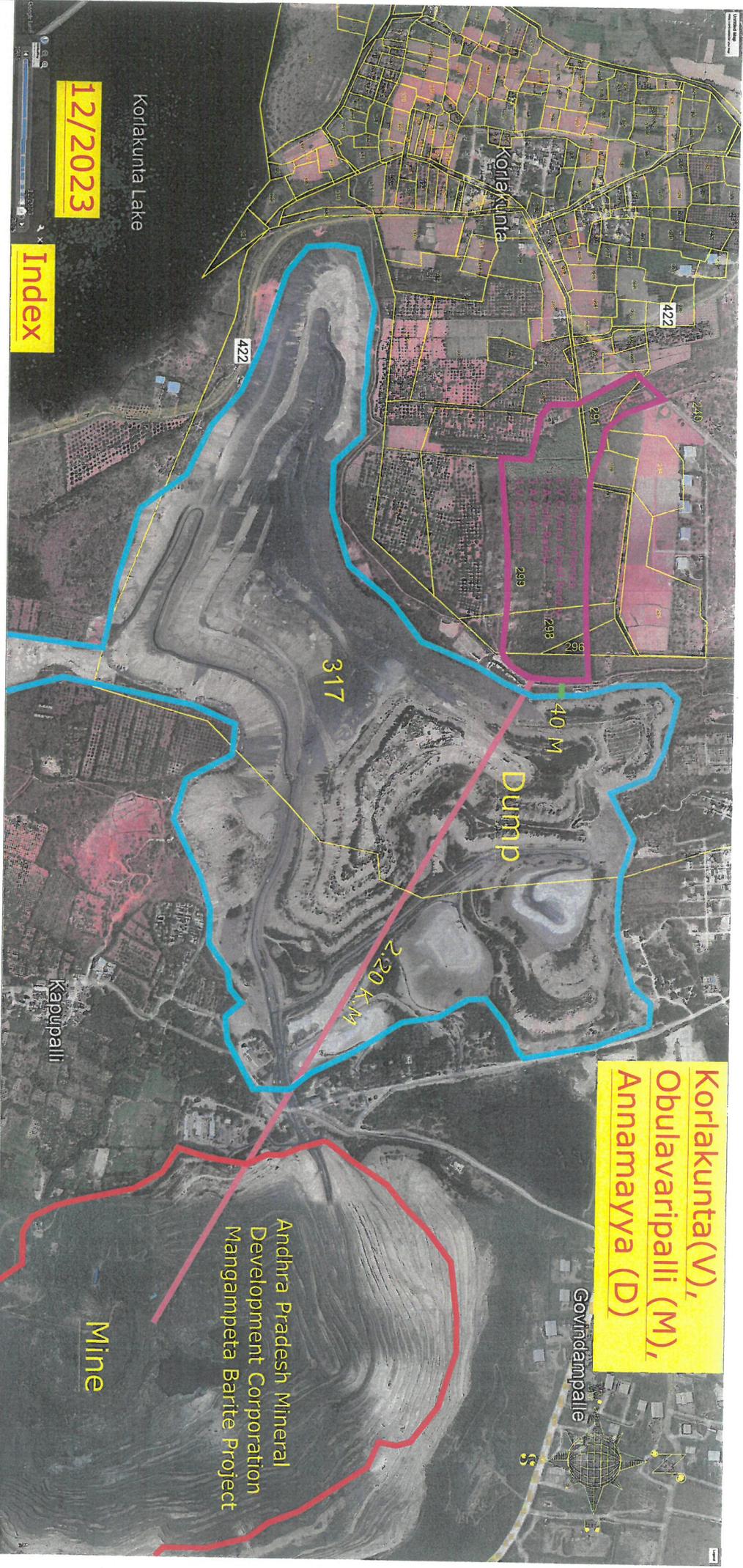
Andhra Pradesh Mineral
 Development Corporation
 Mangampeta Barite Project

Site Boundary (Latitude: 14.033722, Longitude: 79.297829)
 Site Owners Names:
 1. V.O.Venu Gopal Reddy
 2. A.Yalla Reddy
 3. A.Aruna
 4. V.O.Pushpa

Dump Boundary (Latitude: 14.026216, Longitude: 79.305077)
 Sy.No: 317
 Mine Boundary (Latitude: 14.025765, Longitude: 79.320809)
 Note :- 1. Site Boundary to Dump Distance : 90 Meters
 2. Site Boundary to Mine Distance : 2.20 Kilometers

P. Rama Krishna 29/6/25
 P. RAMA KRISHNA
 LICENSED SURVEYOR
 L.S. No. 2668
 Obulavaripalli, Mandali, Kadapa Dt.

A11-10



**Korlakunta (V),
Obulavaripalli (M),
Annamayya (D)**

12/2023

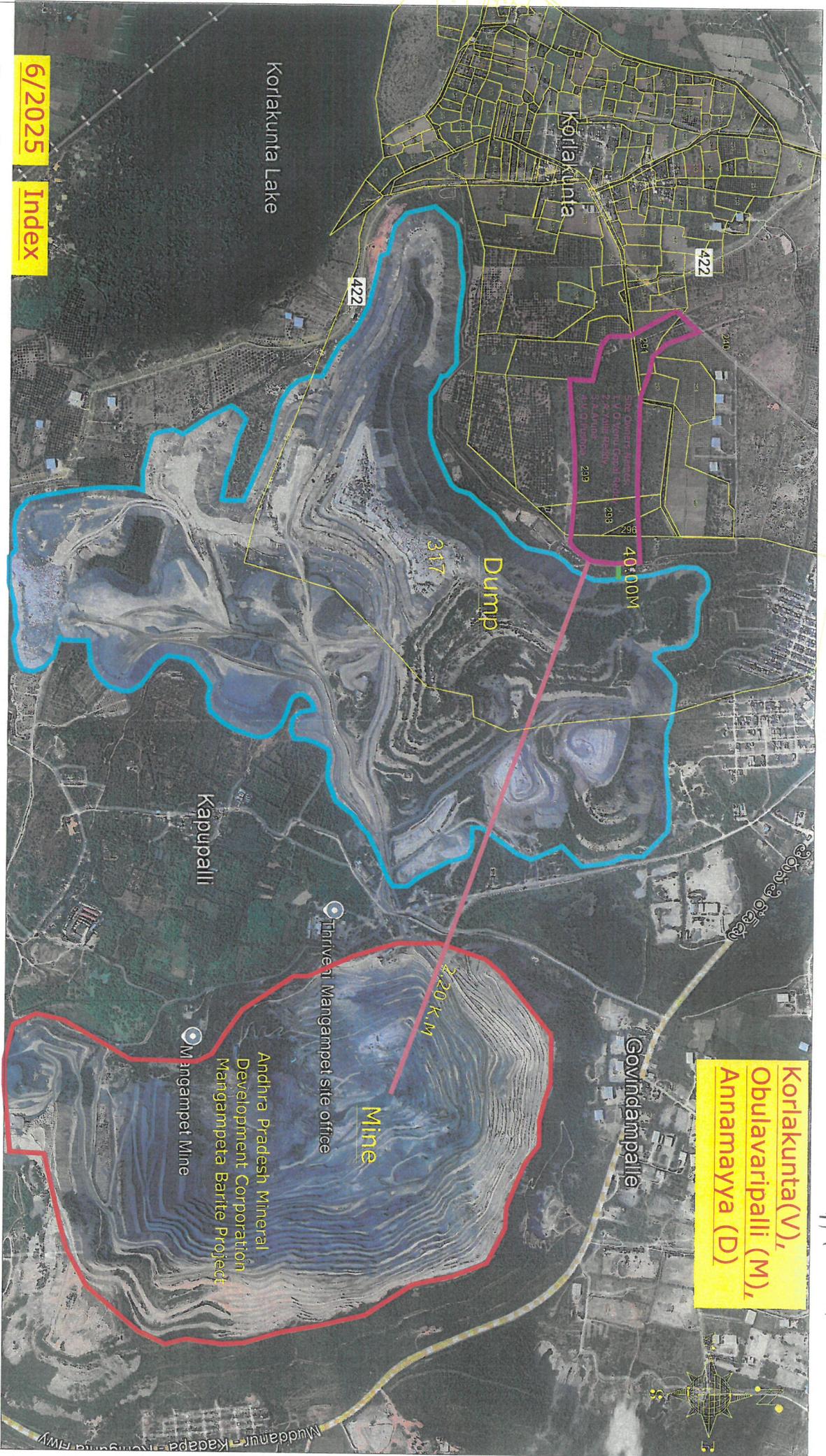
Index

- Site Boundary (Latitude:14.026216, Longitude:79.305077)
- Site Owners Names:
 1. V.O.Venu Gopal Reddy
 2. A.Yalla Reddy
 3. A.Aruna
 4. V.O.Pushpa
- Site Boundary (Latitude:14.033722, Longitude:79.297829)
- Site Owners Names:
 1. V.O.Venu Gopal Reddy
 2. A.Yalla Reddy
 3. A.Aruna
 4. V.O.Pushpa
- Site Boundary (Latitude:14.025765, Longitude:79.320809)
- Site Owners Names:
 1. V.O.Venu Gopal Reddy
 2. A.Yalla Reddy
 3. A.Aruna
 4. V.O.Pushpa

P. Ramakrishna
 P. RAMA KRISHNA
 LICENSED SURVEYOR
 L.S. No. 2668
 Obulavaripalli, Mandali, Kadapa Dt.

A11-11

Korlakunta(V),
Obulavaripalli (M),
Annamayya (D)



6/2025 Index

Dump Boundary (Latitude:14.026216, Longitude:79.305077) — Site Boundary(Latitude:14.033722, Longitude:79.297829)

Sy.No: 317
Mine Boundary (Latitude:14.025765, Longitude:79.320809)

Note :- 1.Site Boundary to Dump Distance :40 Meters
2.Site Boundary to Mine Distance : 2.20 Kilometers

- Site Owners Names:
1. V.O.Venu Gopal Reddy
 2. A.Yalla Reddy
 3. A.Aruna
 4. V.O.Pushpa

R. Ramulu 20/6/25
 P. RAMA KRISHNA
 LICENSED SURVEYOR
 L.S. No. 2668
 Obulavaripalli, Mandali, Kadapa Dist.

REPRESENTATION

Date :
Korlakunta Village

28161

To
The District Collector,
YSR Kadapa District.

Sir,

Sub:- Representation of the Korlakunta village people (Ryoths) in connection with Dunning of Waste Material from Mangampet Bariety mines by private contractors with the connivance of the APMC, Mangampet in the Panchayat fields of Korlakunta village which is highly objectionable for taking necessary immediate action - Request - Reg.

We the ryoths and villagers of Korlakunta Panchayat, Obulavari Palli Mandal, YSR Kadapa District, here undersigned, humbly submits that the Bariety mines of Mangampet are situated by the side of Korlagunta Village Panchayat fields and also very nearer to agricultural fields. The ryoths of Koriakunta raised in their respective fields of different types of gardens like mango teakwood, banana and papaya by investing large amounts.

As the private contractors of Bariety mines with the connivance of APMC, Mangampet dumping waste material near the fields of Korlakunta ryoths and also in the Korlakunta Panchayat fields. Due to this dumping, the waste power and other dust materials are spreading all over the fields of Korlakunta ryoths and also damaging the crops and gardens are in damaging condition. People of Korlakunta also suffering with pollution of air with different kinds of diseases. Apart from this due to this dumping the grazing fields of Korlakunta is almost all covered with waste material. The cattele and the domestic animals are starving without grazing fields. Though the people of Korlakunta made several representations to APMC, General Manager, Mangampet, he did not take any suitable action to save the ryoths of Korlakunta and villagers from this highly dangerous situation. As no other option the people of Korlakunta Panchayat and ryoths humbly submits, that the respectable District Collector, YSR Kadapa District may kind enough in taking suitable action considering the above facts. Dumping of waste materials from the mines of APMC, Mangampet in the fields of Koriakunta Gram Panchayat is highly objectionable. At this circumstances considering the all above facts suitable action may be taken to safe guard the

Handwritten notes:
250/20/11/11
The ryoths
boots to be
seven pl
and late
of ryoths
governance

Handwritten signature:
3/11/11
[Signature]

environment near the village and also to save the lives of the cattle and domestic animals. Otherwise, the people of Korlakunta ryoths will suffer irreparable damage.

Request to take immediate action.

Read over to the undersigned by translating the above contents in Telugu.

People and Ryoths of Korlakunta village,
Obulavaripalli Mandal, YSR Kadapa District

- 1) V. Srida Reddy
- 2) V. Niganni Reddy
- 3) V. P. వెంకటేశం
- 4) V.P. Sathakar Reddy
- 5) P. వెంకటేశం
- 6) V.P. వెంకటేశం
- 7) V.P. వెంకటేశం
- 8) V.P. Jayanthi
- 9) V.P. వెంకటేశం
- 10) V.P. Lakshmi Kar Reddy.
- 11) V.P. Harish Kumar Reddy
- 12) V.P. Sudhakar Reddy.
- 13) E. Subramannam Reddy.
- 14) D. Kiran Kumar Reddy
- 15) D. వెంకటేశం
- 16) V.T. Raja Reddy
- 17) V. వెంకటేశం
- 18) A. వెంకటేశం
- 19) M. Mallikarjuna Reddy
- 20) VC. Srida Reddy
- 21) VC. ~~...~~ వెంకటేశం
- (22) ANUP (A. Nello Reddy)
- (23) V. S. Venugopal Reddy
- (24) A. N. Reddy
- (25) V. S. Reddy
- (26) U. S. Kishore Reddy
(U. SAI KISHORE REDDY)
Member ZPTC.
- 27) V. P. Venkatesh Reddy
- 28) V. P. Reddy
- 29) V. P. Reddy

1. Copy submitted to Hon'ble Minister for Mining, A.P. Hyderabad.
2. Copy submitted to the General Manager, APMC, Mangampet.

ప్రజావాణి వై.యస్.ఆర్. జిల్లా

పేరు : V. సిద్ధారెడ్డి మరియు ఇతరుల కార్డు పట్టిక తేదీ: 3/1/2011

| వరుస సంఖ్య | ప్రజావాణి నెంబరు | చిరునామా | గ్రామము | మండలము |
|------------|--|----------|-------------------------|--------|
| 83 | 28161 | | కార్డు పంపిణీ కార్యాలయం | |
| విషయము | <p>అయితే గ్రామం నుండి కార్డులను ముందుగా పంపిణీ చేయాలని గ్రామీణులకు తెలియజేయాలి. వారికి అవసరమైతే వారికి అవసరమైన సదుపాయాలను అందించాలి. అలాగే గ్రామీణులకు అవసరమైన సదుపాయాలను అందించాలి. అలాగే గ్రామీణులకు అవసరమైన సదుపాయాలను అందించాలి.</p> | | | |

**Translation of Representation by Villagers (Applicants) to District
Collector from Telugu To English**

Prajvani (Panchayat) - YSR District

Name: V.Siddha Reddy & Others Korlakunta Villagers

| Ser. No. | Prajvani No: | Details | Village | Mandal |
|-----------------|---------------------|--|----------------|---------------------|
| 83 | 28161 | | Korlakunta | Obullavari Palli |
| Details | | Nearby my Village Mangampet Byrates Mining is taking place, and they are dumping the mining waste in the Grazing land nearby Korlakunta Village Lands. My Crops are damaged (Mango Trees). Concerned Authorities to conduct Enquiry and justice. | | |

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (SZ)

CHENNAI

MEMORANDUM OF APPLICATION

(Under Section 18(1) read with Sections 14, 15 of National Green Tribunal Act 2010)

Application No. 87 of 2025

IN THE MATTER BETWEEN:

Venugopal Reddy, V.O
& 3 Others

... Applicants

Versus

The Principal Secretary,
Mines and Minerals Department, AP
& 8 Others

... Respondents

M/S: P. SUBBA REDDY

T. SRIKRISHNA BHAGAVAT

COUNSEL FOR THE APPLICANT

No.160, Thambu Chetty Street, Parrys, Chennai – 600 001.

Email: shiyalnath@gmail.com

Mobile No: +91-9884784646, +91-7401435502