

**2343**

**BEFORE THE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, NEW DELHI**

**ORIGINAL APPLICATION NO. 593 OF 2023**

**IN THE MATTER OF:**

MURSALEEN

...APPLICANT

VERSUS

STATE OF HARYANA & ORS

...RESPONDENTS

**OBJECTIONS/ REPLY ON BEHALF OF THE APPLICANT TO  
THE STATUS REPORT DATED 24.06.2024 FILED BY SEIAA,  
HARYANA**

**FILED BY:**

*V D*

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Place: New Delhi  
Filed on: 06.08.2024

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**MOST RESPECTFULLY SHOWETH:**

1. The present Original Application was filed by the Applicant under Section 14 and 15 of the National Green Tribunal Act, 2010 raising *serious and substantial questions relating to the environment* in respect to the rampant and excessive illegal Sand /Sand, Bajri & Boulder Mining continuously going on in District Yamunanagar, Haryana by Mining Lease holders/ Stone crushers and Screening Plants *'in connivance with the officers of the District administration, in particular the District Magistrate, Yamunanagar and District Mining officer, Yamunanagar'*.
2. The Applicant has submitted in the OA that such rampant, excessive and continuous illegal mining is in operation, in the absence of the following:
  - (i) Valid District Survey Report [DSR]
  - (ii) No Comprehensive Mining Plan [CMP]

- (iii) No Replenishment studies
- (iv) Mining outside the Mining lease area
- (v) Mining on basis of invalid/ defective ECs granted without an EIA study/EMP or public hearing/ and EC granting without Cluster EIAs
- (vi) Mining without CTO/CTE
- (vii) Mining using heavy machinery and beyond permissible depth
- (viii) Mining of Bajri, Boulder & Sand on ECs issued for Sand only
- (ix) Non-adherence of EC conditions
- (x) No post Monitoring
- (xi) Mining in a submerged water area;

in blatant disregard to the Environmental Rule of Law, the principle of Sustainable Development, in violation of the EIA, 2006, Sand Mining Guidelines issued by the MOEF in 2016 and 2020, and various Judgments passed by the Hon'ble Supreme Court (*Deepak Kumar, Common Cause, Pawan Kumar, Vellore Citizens, ND Jayal, MC Mehta*) and this Hon'ble Tribunal passed in the cases of *NGT Bar Association, Raj Kumar, Rajjan, Pawan Kumar, Dileep Singh, Junaid Ayubi, Pramod etc...*

The Applicant craves leave of this Hon'ble Tribunal to refer to, and rely upon the averments and submissions made in the body of the Original Application and the Objections filed on 28.04.2024 by the Applicant to the Status Report dated 11.02.204 filed by SEIAA, Haryana, and the same may be read as part and parcel of

the present objections in *toto*, and are not repeated herein for the sake of brevity.

4. This Hon'ble Tribunal vide its Order dated 6.10.2023 after noticing all the averments made in the OA and the IA No. 753 of 2023 directed the Applicant herein to implead the concerned private parties and at the **first instance** directed the SEIAA, Haryana to give a report covering all the points noted in the order.
5. Pursuant to the said Order dated 6.10.2023, the SEIAA, Haryana vide its Office Order dated 26.10.2023 constituted a Sub-Committee comprising of 8 persons, including very representatives of the Mining Department Haryana and Yamunanagar, against whom direct allegations were made in the present OA. The said Sub-Committee was directed to visit the sites of the Mining lease sites in District Yamunanagar, and give a report covering all the points mentioned in the OA.
6. That based on the site visits made by the Sub-Committee, the SEIAA, Haryana filed its Status Report on 11.02.2024, wherein it found clear evidence of mining activities being performed in large scale upto 15-30 ft depth till reaching of the water table, however failed to name the person(s) involved in such illegal mining. Furthermore, the Status Report discloses the pendency of 64 FIRs in respect of illegal mining being registered in the District, Yamunanagar, and recommended for a detailed enquiry to be conducted in the matter.

**THE RELEVANT PORTIONS OF THE STATUS REPORT FILED BY THE SEIAA, HARYANA ARE EXTRACTED AS UNDER:**

**“During inspection, clear evidence of mining at huge scale were observed in the vicinity of Bailgarh North & South mining sites...”**

*Further, on the way back to O/o Regional officer, HSPCB, Yamuna Nagar Region, after inspection, **clear evidences of mining activities being performed at large scale (outside Riverbed), with an average depth of mining ranging between 15 to 30 feet, were also observed in the vicinity of villages namely Devdhar, Bhalla Majra, Mujahid wala and Doiwala.** However, at the present juncture it is difficult to ascertain whether the mining activities were performed legally/illegally or to earmark the individuals/firms responsible for above mentioned mining activities it is further pertinent to mention here that the pits formed due to mining activities in the above mentioned villages were found submerged with water thereby giving inference that the **mining activities were continued till reaching the depth of water table,** resulting thereby difficult to ascertain the actual depth of mining carried out. Further, it is also pertinent to mention here that the facts of mining being done legally or outside the earmarked mining sites can only be ascertained after detailed enquiry in the matter by Mines & Geology Department Revenue Department, Haryana State Water Resources Authority and other stake holding agencies/departments.*

*That Keeping in view of all the facts, circumstances, inspection conducted by the answering respondent and the data obtained from the Mining Department & HSPCB, it is appropriate to mention here in addition to the submission of reports and the documents as annexed in the preceding Para’s **upon analysis of all facts and data, no prudent man can draw the inference that there was no illegal mining at the site, as the pits formed due to mining actives were found sub merged with the water and this facts itself that the mining activities were continued till reaching the depth of water table.** Further, it is necessary to mention here that keeping in view the past violation, **64 number of FIR’s had already been registered against illegal mining** in Bailgarh*

*(North) & (South) Mining sites by the Mines & Geology Department...*

*(emphasis is ours)*

7. The Applicant herein filed objections/reply on behalf dated 28.04.2024 to the Report dated 11.02.2024 filed by SEIAA, Haryana detailing the following issues:

- (i) No Valid DSR / No Comprehensive Mining Plan
- (ii) Replenishment study not conducted for a majority of the Sand Blocks [*20 out of 28 Mining leases are located in the River bed whereas Replenishment study has only be conducted for 4 Mining leases including those mentioned at Serial No. 6,11 and 13 of the Tabular Chart*]

Additionally, the Applicant raised strong objections to manner in which the Status Report was filed and also on merits, which are as follows:

- A. SEIAA wrongly delegated its functions to a Sub-Committee comprising of the very officials against whom serious allegations were raised in the OA.
- B. SEIAA Status Report – Incomplete (non-compliance of directions) of directions pertaining to:
  - Mining continuing despite termination of leases
  - Mining beyond lease area
  - Illegal Mining of BGS under Mining leases/ EC for sand only
  - Mining in area between 5-25 ha without EIA/ Public hearing

- No Reply on the allegation that there is no post monitoring compliance in respect of any of the 28 Mining leases (including the 10 alleged operational mines)

The Applicant had submitted that the Status Report is completely silent on the issue delineated above, and a conspectus of the entire matter ostensibly shows breakdown of the State Machinery in District Yamunanagar who are in active connivance with the Mining lease holders.

It is trite to submit that the Applicant vide the Objections dated 28.04.2024 specifically and categorically submitted that Mining operations in District Yamunanagar are mostly carried out outside the Mining lease areas in active connivance with the officials of the Mining Department, and thus an area inspection rather than a Mine area specific inspection ought to be carried out. The Applicant had pointed to the Mining Block mentioned at Serial No. 10 of the status Report (Malikpur Khadar Block YNR B28) [Serial No. 3 in Annexure A-1 to the OA] in respect of which though the Status report is silent, but the Joint Inspection Report at Page 286 of the Report states that “*further, the team also observed that approx. 4-4.5 Acres of land is illegally excavated adjoining the lease area which is also now cultivated by the landowners*”.

The above remarks by the Joint Committee, which are silent and not mentioned in the Main Status Report gives impetus to the Applicant’s submission that the Sub-Committee comprised of partial and biased individuals, wherein despite the aforesaid

averments, the Sub-Committee only inspected the Mining lease areas of the 10 operational mines, and not the Area in and around the Mining lease area.

The Applicant craves leave of this Hon'ble Tribunal to refer to, and rely upon the averments and submissions made in the body of the said Objections filed on 28.04.2024 and the same may be read as part and parcel of the present objections in *toto*, and are not repeated herein for the sake of brevity.

8. This Hon'ble Tribunal vide its Order dated 30.05.2024 after hearing the parties had reserved the matter for Orders. This Hon'ble Tribunal further directed SEIAA, Haryana as under:

*“Learned Counsel for SEIAA is permitted to file complete information in the tabulated form in respect of all the private respondents covering the details relating to the period of lease, excess mining if done in violation of the norm and also the replenishment study along with the other relevant disclosures, within one week.”*

9. The SEIAA, Haryana accordingly filed their Reply on 24.06.2024. This Hon'ble Tribunal vide Order dated 4.07.2024 permitted the Applicant to file objections to the said Report dated 24.06.2024 filed by SEIAA, Haryana in furtherance of the Order dated 30.05.2024, SEIAA, Haryana.
10. In furtherance of the said Order dated 4.07.2024, the Applicant herein has prepared a Tabular Chart indicating the information given by the SEIAA and the corresponding Reply of the Applicant.

A Tabular Chart indicating the information supplied by SEIAA, Haryana and the corresponding Reply/Objection of the Applicant in respect of the 28 Mining leases are enclosed herein and marked as **ANNEXURE-A at ( 10-27)**.

In view of the abovementioned submissions, the Applicant most respectfully submits that this Hon'ble Tribunal may be pleased to pass Orders as prayed for in the OA and the objections filed on 28.04.2024, in the interest of justice and Environmental rule of Law.

**FILED BY:**

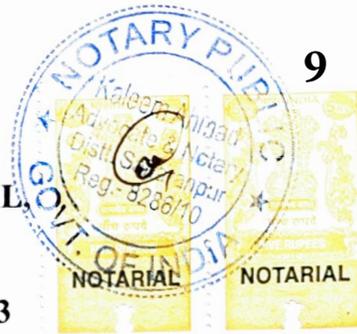


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...APPLICANT

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...RESPONDENTS

AFFIDAVIT

I, Mursaleen S/o Wali Mohammad, R/o Tajewala (3), Yamunanagar, Haryana, do hereby solemnly affirm and declare as under:

1. I say that I am the Applicant in the above Original Application and I am well conversant with the facts and circumstances of the case.
2. I say that I have read and understood the contents of the accompanying reply to report/objections which has been drafted on my instructions and I say that the facts stated therein are true to my knowledge.

I say that the averments of facts stated herein above are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.

*Mursaleen*

DEPONENT

VERIFICATION:-

Verified at \_\_\_ on this 18 day July, 2024, that the contents of the present affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed therefrom.

**IDENTIFIED BY**

*Mursaleen*

DEPONENT

9/16/2024  
18/7/2024

This affidavit is made before me today  
at my office...  
by *Mursaleen S/o Wali Mohammad*  
who is assisted by *Kaleem Ahmad*  
as witnesses of the affidavit have been  
examined & the deponent who admit  
to the contents of the affidavit.  
Saharanpur  
Kaleem Ahmad  
Advocate & Notary

**KALEEM AHMAD**  
Advocate  
Reg. No.-10533/01  
Ch.-63, Civil Court, SRE  
Mob.-9359206239

## ANNEXURE A

SR. NO/ RES NO.	NAME OF MINING UNIT / AREA (IN HA)/ TYPE OF MINING MATERIAL	NAME OF LEASE HOLDER	DATE OF AUCTION	LOI VALIDITY - EXPIRY (IN YEARS)	DATE OF APPROVAL OF MINING PLAN & VALIDITY (IN YEARS)	DATE OF GRANT OF EC & EXTENSION GRANTED	STATUS OF THE MINING SITE & REPLENISHMENT STUDY	EXCESS MINING IF DONE	APPLICANT'S OBJECTIONS
									<u>COMMON TO ALL 28 MINES:</u> - No DSR/COMPREHENSIVE MINING PLAN - No POST MONITORING COMPLIANCE
1. <b>R7</b>	BEGAMPUR BLOCK YNR B37  [39.50 ha]  BGS	M/s Yamuna Infra Developers Pvt. Ltd  7,11,000 TPA	10-11.06.2015	19.06.2015 - 18.06.2024	01.01.2016 [valid for 5 years]	29.06.2017	Contract terminated due to outstanding government dues vide order dt. 26.11.2020 of DGMG, Haryana	No Violation	<u>Non- Operational</u>  • <b>Mining Continuing after termination</b>
2. <b>R8</b>	PIPLI MAJRA BLOCK YNR B29, 30 & 31  [18.20ha]  BGS	M/s Paramjeet Singh S/o Hardeep Singh  3,70,000 TPA	20-21.08.2015	14.09.2015 - 13.09.2023	24.12.2015 [valid for 5 years]	13.10.2016 & 17.11.2022	Contract period expired on dt. 13.09.2023	No Violation	<u>Operational [/@703/]</u>  • <b>5-25 ha*</b> [EC without EIA Study, Public hearing] • <b>Admittedly mining continuing after expiry of LOI dated 13.09.2023</b> - mine is operational as per SEIAA Report dt. 11.02.2024 [/@703]
3. <b>R9</b>	MALIKPUR KHADAR BLOCK YNR B28  [23.20 ha]  BGS	M/s Karaj Singh S/o Major Singh  4,00,000 TPA	20-21.08.2015	14.09.2015 - 13.09.2024	22.12.2015 [valid for 5 years]  01.12.2021 [valid for 3 years]	13.10.2016 & 21.06.2022	1. <b>Working</b>  2. Replenishment Study has been approved by the Mines & Geology Department alongwith Mining Pan	No Violation	<u>Operational [/@708/]</u>  • <b>5-25 ha*</b> [EC without EIA Study, Public hearing] • Mining continuing after termination - Termination letter dt. 14.07.2022. [EC granted 25 days before Termination] [/@426-429]

									<ul style="list-style-type: none"> <li>• <b>Mining beyond lease area [Ref CAG Report @513]</b></li> <li>• <b>Approx 4-4.5 acre of adjoining land illegally excavated as per joint inspection report [ @940] - No reply by SEIAA on this aspect. [ @ 1275, Objections]</b></li> <li>• FIR 285/2022 lodged by mining department and CM flying squad for illegally excavated area – Mining still operational and EC extended [ @664,940]</li> <li>• Replenishment Study not done [ @670]</li> </ul> <p><b>NOTE:</b> In Status Report, SEIAA [ @670] stated “No need of Replenishment study due to outside River bed”</p>
4. <b>R10</b>	KOHLIWAL A BLOCK YNR B21 & 22  [13.59 ha]  BGS	M/s Delhi Royalty Company  2,50,000 TPA	10- 11.06.2015	19.06.2015 – 18.06.2024	23.02.2016 [valid for 5 years]  12.10.2021 [valid for 3 years]	27.06.2016 & 16.05.2022	Contract terminated due to outstanding government dues vide order dt. 10.12.2021 of DGMG, Haryana	Violation of environmental norms: As per Para no.8 order of the Hon’ble NGT dt. 18.11.2022, as per common cause, compensation in case of illegal mining can be equal to value of the mined material, apart from compensation of environmental norms, recovery @ 10% of lease money was fixed i.e. 4.2 crore.	<p><u>Non- Operational</u></p> <ul style="list-style-type: none"> <li>• <b>5-25 ha* [EC without EIA Study, Public hearing]</b></li> <li>• <b>Admittedly mining continuing after expiry of LOI dated 18.06.2024.</b></li> <li>• Mining Continued after termination. This Hon’ble Tribunal in OA No. 150 of 2021 vide Order dated 18.11.2022 imposed penalty of 4.2 Crores which is not yet recovered.</li> </ul>

								<p>In this regard OA No. 150/2021 (Anish Vs Union of India &amp; Ors.) is already disposed by the Hon'ble NGT on dt. 18.11.2022. The contractor company filed a Civil Appeal No. 319/2023 against the above orders of Hon'ble NGT, before the Hon'ble Supreme Court in which Hon'ble Apex Court vide orders dt. 16.01.2023, directed the appellant company to deposit 60% of the penalty amount of Rs. 4.2 crore on or before 28.02.2023. before the competent authority. In case of deposition there will be stay of recovery of further amount.</p>	<i>[@441-447]</i>
5. <b>R11</b>	GALAURI BLOCK YNR B39  [24.00 ha]  BGS	M/s Sh. Kawaljeet Singh Batra S/o Makhan Singh Batra	30- 31.08.2016	20.10.2016 – 24.05.2025	30.12.2016 <i>[valid for 5 years]</i>	25.05.2017	Mining operation lying suspended due to non-payment of outstanding penalty amount and government dues.	<p>Illegal Extraction of Boulder/Gravel/Sand upto 10 meters depth beyond permissible limit of 9-meter depth with in contracted lease area. In this regard</p>	<p><b><u>Operational as per SEIAA Report dated 11.02.2024</u></b> <b><u>[@717]</u></b></p> <ul style="list-style-type: none"> <li>• 5-25 ha* <i>[EC without EIA Study]</i> <b><u>[@671]</u></b></li> <li>• Mining beyond lease area</li> </ul>

		4,40,000 TPA						<p>DGMG, Haryana suspended the mining operations vide order dt. 17.05.2021.</p> <p>Further, in this regard OA No. 337/2021 (Shokin Ali Vs State of Haryana &amp; Ors.) is already disposed by the Hon'ble NGT on dt. 12.05.2022.</p> <p>Furthermore, the Regional Officer HSPCB, Yamunanagar cancelled the CTO and issued the closure orders of mining block vide dt.17.06.2022. after that, HSPCB grant the new consent to operate to M/s Kawaljeet Singh Batra on dt 08.09.2023.</p>	
6. <b>R12</b>	DEVDHAR BLOCK YNR B24  [31.87 ha]  BGS	M/s Northern Royalty Company  5,10,000 TPA	10- 11.06.2015	19.06.2015 – 18.06.2024	01.01.2016 [valid for 5 years]  12.10.2021 [valid for 3 years]	27.06.2016 & 21.06.2022	1. <b>Working</b>  2. Replenishment Study has been approved by the Mines & Geology Department along- with Mining plan.	No Violation	<b><u>Operational [/@835]</u></b> <ul style="list-style-type: none"> <li>• Mining Continuing after termination – Termination letter dt. 14.7.2022 [/@431-435]. [EC renewed 25 days before]</li> <li>• No Replenishment Study [/@ 671, SEIAA Status Report] – Now Changed their stand</li> <li>• SCN dt. 23.10.2023 issued by department for</li> </ul>

									violation of EC conditions and mining plan <i>[@664, 904]</i>
									<ul style="list-style-type: none"> <li>• <b>LOI expired on 18.06.2024.</b></li> </ul>
7. <b>R13</b>	BAILGARH SOUTH BLOCK YNR B2  [28.00 ha]  BGS	M/s Mubarikpur Royalty Company  13,00,000 TPA	10-11.06.2015	19.06.2015 – 18.06.2025	23.02.2016 <i>[valid for 5 years]</i>  12.10.2021 <i>[valid for 4 years]</i>	27.06.2016	Contract terminated due to outstanding government dues vide order dt, 14.07.2022 of DGMG, Haryana.	Violation of environmental norms: As per para no. 8 of order of the Hon'ble NGT dt 18.11.2022, as per common cause, compensation in case of illegal mining can be equal to value of the mined material, apart from compensation of environmental norms, recovery @ 10% of lease money was fixed i.e. 12 crore.  In this regard OA No. 150/2021 (Anish Vs Union of India & Ors.) is already disposed by the Hon'ble NGT on dt 18.11.2022  The contractor company filed a Civil Appeal No. 319/2023 against the above orders of Hon'ble NGT, before the Hon'ble Supreme Court in which Hon'ble Apex	<u>Non- Operational</u> <ul style="list-style-type: none"> <li>• Mining Continuing after termination <i>[@436-440]</i></li> <li>• This Hon'ble Tribunal in OA No. 150 of 2021 vide Order dated 18.11.2022 imposed penalty of 12 Crores which is not yet recovered. No deposit made by M/s Mubarakpur, let alone 60%.</li> </ul>

									Court vide orders dt. 16.01.2023, directed the appellant company to deposit 60% of the penalty amount of Rs. 12 crore on or before 28.02.2023 before the competent authority. In case of deposition there will be stay of recovery of further amount.	
8. <b>R14</b>	JAIDHARI BLOCK YNR B33  [48.60 ha]  BGS	M/s P.S. Buildtech  9,10,000 TPA	05- 06.11.2015	30.11.2015 – 14.09.2024	10.06.2016 [valid for 5 years]  01.12.2021 [valid for 3 years]	15.09.2016 & 09.11.2022	1. Working  2. Replenishment Study has been approved by the Mines & Geology Department along- with Mining Plan	No Violation	<b><u>Operational</u></b> <b>[@731]</b>  <ul style="list-style-type: none"> <li>• SCN dt. 23.11.2023 issued by department for violation of EC conditions and mining plan <b>[@664, 904]</b> – No action post SCN</li> <li>• LOI is about to be terminated on 14.09.2024 whereinafter Mining cannot legally continue.</li> <li>• Replenishment Study not done <b>[@672]</b></li> </ul> <b>NOTE:</b> In Status Report, SEIAA <b>[@670]</b> stated “No need of Replenishment study due to outside River bed”	

9. <b>R15</b>	DHANAUR A BLOCK YNR B18  [18.18 ha]  BGS	M/s JPY Consortiu m Pvt. Ltd.  9,50,000 TPA	13- 14.12.2017	28.12.2017 – 18.06.2028	26.03.2018 [valid for 5 years]  19.09.2023 [valid for 5 years]	19.06.2018 & 03.11.2023	The account of mining contractor on e-Rawaana Portal was suspended/deactivated 22.06.2023 due to violations.	Violation like non operational weighbridge and CCTV camera etc.	<u>Non- Operational</u>  • 5-25* [EC without EIA Study] [a672]
10. <b>R16</b>	MANDOLI GHAGGAR WEST BLOCK YNR B4  [25.56 ha]  Sand	M/s JSM Foods Pvt. Ltd.  11,91,000 TPA	10- 11.06.2015	19.06.2015 – 18.06.2023	08.01.2016 [valid for 5 years]  12.10.2021 [valid for 2 years]	21.12.2016 & EC expansion granted dated 7.10.2022	Contract period expired on dt. 18.06.2023	In this regard, OA No. 423/2022 titled das Mohinder Pal & Anr. Vs State of Haryana & Ors. iss pending in the Hon'ble NGT, New Delhi, in which the Hon'ble NGT vide order dated 31.05.2022 stayed the mining of boulder and gravel.	<u>Non- Operational</u>  • Replenishment Study by Private Organization (Not NABET Approved) [a1706] in violation of EC Clause 19 [a1538] • BGS Mining, EC for Sand Only. • LOI expired on 18.06.2023
11. <b>R16</b>	MANDOLI GHAGGAR EAST BLOCK YNR B3  [20.18 ha]  Sand	M/s JSM Foods Pvt. Ltd.  8,50,000 TPA	10- 11.06.2015	19.06.2015 – 18.06.2026	08.01.2016 [valid for 5 years]  12.10.2021 [valid for 5 years]	21.12.2016 & 07.10.2022	The mining block was auctioned on 10-11.06.2015 and LoI for extraction of minor mineral "Sand" was issued by DGMG, Haryana vide orders dated 19.06.2015. The mining of contractor started mining operations on 18.06.2017. Further, mining of boulder-gravel was permitted by DGMG, Haryana vide orders dated 26.11.2020 as per request of the contractor on 31.05.2022 Hon'ble	In this regard OA. No. 423/2022 titled as Mohinder Pal & Anr. Vs State of Haryana & Ors. Is pending in the Hon'ble NGT, New Delhi, in which the Hon'ble NGT vide order dated 31.05.2022 stayed the mining of boulder and gravel.	<u>Operational [a744]</u>  • 5-25 ha* [EC without EIA Study] [a673]  • No Replenishment Study – Replenishment Study by Private Organization (Not NABET Approved) [a1679] in violation of EC Clause 19 [a1527]  • BGS Mining under EC for Sand Only  • Despite stay by this Hon'ble Tribunal in OA No. 423 of 2022, mining of Sand is continuing.

							<p>NGT New Delhi stayed the mining of boulder-gravel in OA No.423/2022 (Mohinder Pal &amp; Ors Vs. State of Haryana &amp; ors). In compliance of orders dated 31.05.2022 of Hon'ble NGT &amp; 06.06.2022 of DGMG Haryana Mining of boulder-gravel has been stayed.</p> <p>After that the mining of mineral only sand is carried out by the contractor.</p>		<p><b>Note:</b> If BGS is in coalition quantity, it is incompressible how Sand can be separated and mined.</p>
12. <b>R17</b>	<p>GUMTHAL A NORTH BLOCK YNR B16</p> <p>[44.62 ha]</p> <p>Sand</p>	<p>M/s Joginder Singh S/o Mohinder</p> <p>21,00,000 TPA</p>	<p>10-11.06.2015</p>	<p>19.06.2015 - 18.06.2023</p>	<p>15.02.2016 [valid for 5 years]</p>	<p>27.06.2016</p>	<p>Contract terminated due to outstanding government dues vide orders of DGMG, Haryana dt. 25.04.2022.</p>	<p>Illegal excavation of 1,16,250 cubic meters of sand by the mining contractor beyond/outside the contract area and DGMG, Haryana imposed the penalty of Rs. 3,25,50,000 vide orders dated 23.01.2020.</p> <p>The contractor company filed an Appeal against the above orders before the appellate authority-cum Administrative Secretary, in which vide orders dated</p>	<p><u>Non- Operational</u></p> <ul style="list-style-type: none"> <li>• Mining beyond lease area [Ref CAG Report @512]</li> <li>• Replenishment study submitted but not approved. [752]</li> </ul>

								04.09.2020, the Principal Secretary to Govt. of Haryana Mines & Geology while allowing the appeal directed them to deposit the amount in 08 equal installments.  Further the contractor deposited only 02 installments and thereafter taking action in this behalf the mining contract was terminated vide orders dated 25.04.2022 of the DGMG, Haryana.	
13. <b>R18</b>	NAGLI BLOCK YNR B15  [77.25 ha]  Sand	M/s M.P. Traders  22,40,000 TPA	30- 31.08.2016	20.10.2016 – 19.10.2027	06.03.2017 [valid for 5 years]  11.10.2022 [valid for 5 years]	09.04.2018	1. Working  2. Replenishment study has been submitted by PP vide letter dated 31.05.2024	No Violation	<b><u>Operational</u> [/@758/]</b>  <ul style="list-style-type: none"> <li>No approved Replenishment study for years 2022 (Post Monsoon) and for 2023.</li> <li>Replenishment study allegedly after the Order of Tribunal in the present OA by private organization (Non NABET approved) [/@1034]</li> </ul> <b><u>NOTE:</u></b> SEIAA Report dt. 11.02.2024 silent on 2023 Replenishment study [/@ 674]  <ul style="list-style-type: none"> <li>Mining beyond lease area [Ref CAG Report @512]</li> </ul>

14. <b>R19</b>	POBARI BLOCK YNR B11  [23.05 ha]  Sand	M/s Developm ent Strategies Pvt. Ltd  11,00,000 TPA	10- 11.06.2015	19.06.2015 – 18.06.2025	09.03.2016 [valid for 5 years]  12.10.2021 [valid for 4 years]	27.06.2016	Contract terminated due to outstanding government dues vide orders of DGMG, Haryana dt. 29.08.2022	Violation of environmental norms: As per para no.8 of order of the Hon'ble NGT dated 18.11.2022, as per common cause, compensation in case of illegal mining can be equal to value of the mined material apart from compensation of environmental norms, recovery @ 10% of lease money was fixed i.e. 2.5crore.  In this regard OA No. 150/2021(Anish Vs union of India 7 Ors). Is already disposed by the Hon'ble NGT on dated 18.11.2022  The contractor company filed a Civil Appeal No. 319/2023 against the above orders of Hon'ble NGT before the Hon'ble Supreme Court in which Hon'ble Apex Court vide orders dated 16.01.2023, directed the appellant company to deposit 60% of the penalty amount of Rs 2.5crore on or before 28.02.2023 before the competent authority. In case of	<u>Non- Operational</u>  • 5-25 ha* [EC without EIA Study] [674]  • This Hon'ble Tribunal in OA No. 150 of 2021 vide Order dated 18.11.2022 imposed penalty of 12 Crores which is not yet recovered. No deposit made by M/s Development Strategies let alone 60%.
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								deposition there will be stay of recovery of further amount.	
15. <b>R20</b>	BEER TAPU BLOCK YNR B7  [14.45 ha]  Sand	M/s Routes & Journeys  6,15,000 TPA	10- 11.06.2015	19.06.2015 – 18.06.2023	08.01.2016 [valid for 5 years]  01.12.2021 [valid for 2 years]	27.06.2016 & 10.11.2022	Contract period expired on dt. 18.06.2023	No Violation	<u>Non- Operational</u>  • 5-25 ha* [EC without EIA Study] [674]  • Contract is terminated due to expiry of LOI on 18.06.2023.
16. <b>R21</b>	GUMTHAL A SOUTH BLOCK YNR B17  [49.67 ha]  Sand	M/s Elite Mining Corporatio n  21,88,008 TPA	05- 06.11.2015	30.11.2015 – 29.11.2025	23.02.2016 [valid for 5 years]  10.11.2022 [valid for 3 years]	09.03.2017 & 29.11.2023	1. Working  2. Replenishment Study has been submitted by PP vide letter dated 31.05.2024	No Violation	<u>Operational [773]</u>  • No Cluster EC  <b>NOTE:</b> EC dated 9.03.2017 itself record existence of Cluster – mine lease exists within 500m [1115]  • Mining beyond lease area [Ref CAG Report 513]  • Replenishment study conducted by Private Organization (Non NABET Approved) in violation of EC Clause 19. [1119]  • Even otherwise, damages to be imposed for conducting mining without Replenishment study in the year 2023.

17. <b>R22</b>	KANALSI BLOCK YNR B5  [44.14 ha]  Sand	M/s P.S. Buildtech  19,15,000 TPA	05- 06.11.2015	30.11.2015 – 14.09.2025	10.06.2016 [valid for 5 years]  01.12.2021 [valid for 4 years]	15.09.2016 & 07.10.2022	The mining block was auctioned on 05-06.11.2015 and LOI for extraction of minor mineral “Sand” was issued by DGMG Haryana vide orders dated 30.11.2015. the mining contractor started mining operations on 27.01.2017 Further, mining of boulder-gravel was permitted by DGMG, Haryana vide orders dated 26.11.2020. on 31.05.2022, Hon’ble NGT New Delhi stayed the mining of boulder-gravel in OA No. 423/2022 (Mohinder Pal & Ors Vs. State of Haryana & Ors). In compliance of orders dated 31.05.2022 of Hon’ble NGT & 06.06.2022 of DGMG, Haryana Mining of boulder-gravel has been stayed. After that the mining of mineral only sand is carried out by the contractor	In this regard, OA NO 423/2022 titled as Mohinder Pal & Anr. Vs. State of Haryana & Ors. Is pending in the Hon’ble NGT, New Delhi, in which the Hon’ble NGT vide order dated 31.05.2022 stayed the mining of boulder and gravel.	<b><u>Operational /@778/</u></b>  • BGS Mining under EC for Sand Only  • Despite stay by this Hon’ble Tribunal in OA No. 423 of 2022, mining of Sand is continuing.  <b><u>Note:</u></b> If BGS is in coalition quantity, it is incompressible how Sand can be separated and mined.
18. <b>R22</b>	JATHLANA BLOCK YNR B12	M/s P.S. Buildtech  36,00,000	05- 06.11.2015	30.11.2015 – 29.11.2026	10.06.2016 [valid for 5 years]	17.03.2017	1. Working  2. EC was granted by MOEF & CC, GOI	No Violation.	<b><u>Operational /@783/</u></b>  • Mining continuing after termination – Termination

	[101.27 ha] Sand	TPA			24.08.2023 [valid for 3 years]				letter dt. 31.07.2021 [404-412] – No Reply or reference to Termination Order dated 31.7.2021
19. <b>R11</b>	MT KARHERA BLOCK YNR B 13 [67.79 ha] Sand	Sh. Kawaljeet Singh Batra Prop S/o Makhan Singh Batra  28,50,000 TPA	30-31.08.2016	20.10.2016 – 19.10.2024	23.02.2017 [valid for 5 years]  25.01.2023 [valid for 2 years]	09.04.2018 & expansion granted dated 09.06.2023	1. Working 2. Replenishment study has been submitted by vide letter dated 31.05.2024	No Violation	<b><u>Operational [4788]</u></b>  • Replenishment study allegedly after the Order of Tribunal in the present OA purportedly by private organization (Non NABET approved).
20. <b>R23</b>	LAPRA BLOCK YNR B10 [34.28 ha] Sand	M/s Apar Mines Management Service Pvt. Ltd  15,30,000 TPA	06-07.07.2015	20.07.2015 – 26.06.2023	09.03.2016 [valid for 5 years]	27.06.2016	As the conditions of e-auction was violated by the bidder company by changing the director of the company, therefore, the mining contract was terminated vide orders dt. 02.07.2020 of DGMG, Haryana	No Violation	<b><u>Non- Operational</u></b>  • Mining purportedly terminated vide Order dated 22.06.2020 or 2.07.2020 as per latest Reply [4676], however the Applicant has averred that Mining is continuing.
21. <b>R24</b>	YNR UNIT-II [554.13]	M/s Astin Excavation & Mining Pvt. Ltd	24.12.2013	03.01.2014 - 02.01.2023	22.12.2014 [valid for 5 years]	21.12.2015	Contract period expired on dt. 02.01.2023	Illegal Extraction of Boulder/Gravel /Sand upto 11 Meter depth beyond permissible	<b><u>Non- Operational</u></b>  • Damages to be imposed for admittedly having

	ha] BGS	120,00,000 TPA						limit of 9-meter depth with in contracted lease area (Khasra No. 76, Pammuwala).  Further, FIR No. 57/2021 has been lodged in this regard at P.S. Sadhaura by BDPO, Sadhaura.	conducting illegal mining.
22. <b>R25</b>	BAILGRAH NORTH BLOCK YNR B1  [44.00 ha]  BGS	M/s Calleis Realtech Pvt. Ltd  2,14,000 TPA	10- 11.06.2015	19.06.2015 – 18.06.2022	02.02.2016 <i>[valid for 5 years]</i>	Not Applied	Due to non-payment of contract money as the contractor company did not obtained EC/CTO the mining contract was terminated vide order dt. 14.01.2021 of DGMG, Haryana	No Violation	<u>Non- Operational</u>  • <b>Damages to be imposed for duration where mining was done without EC.</b>
	--do--  [25.96 ha]	M/s Maa Vaishno Minerals  1,16,000 TPA	25- 26.08.2022	06.10.2022 – 05.10.2029	26.06.2023 <i>[valid for 5 years]</i>	Not Applied	The mining block was e-auctioned on dated 25/26.08.2022 & the LOI was revoked vide orders of DMG, Haryana dated 17.02.2023 due to violations of the conditions of the LOI. Further, the Project Proponent appealed before the appellate authority (ACS, Mines 7 Geology) and dated 17.02.2023 is set aside subject to conditions. Now the Project Proponent has applied for NOC's from other	No Violation	<u>Non- Operational</u>  • However the Applicant has averred that Mining is continuing.

							department and mining activity is still not commenced at the site.		
23. <b>R26</b>	BHOOD KALAN BLOCK YNR B19  [12.62 ha]  BGS	M/s Ganga Yamuna Mining Company  2,59,000 TPA	10-11.06.2015	19.06.2015 – 11.04.2023	07.02.2015 [valid for 5 years]  01.12.2021 [valid for 2 years]	12.04.2016	Contract terminated due to outstanding government dues vide orders dt. 14.07.2022 of DGMG, Haryana.	No Violation	<u>Non- Operational</u>  • 5-25 ha* 5-25* [EC without EIA Study and Public hearing] [677]  • Mining continuing after termination [413-419]
24. <b>R26</b>	BHOOD MAJRA BLOCK YNR B20  [9.95 ha]  BGS	M/s Ganga Yamuna Mining Company  2,00,000 TPA	10-11.06.2015	19.06.2015 – 18.06.2023	23.12.2015 [valid for 5 years]  01.12.2021 [valid for 2 years]	27.06.2016	Contract terminated due to outstanding government dues vide orders dt. 14.07.2022 of DGMG, Haryana.	No Violation	Non- Operational  • 5-25 ha* 5-25* [EC without EIA Study and Public hearing] [677]  • Mining continuing after termination [413-419]
25. <b>R25</b>	MANDEWALA BLOCK YNR B38  [15.00 ha]  BGS	M/s Saharanpur Mines Management Services Pvt. Ltd  2,40,000 TPA	10-11.06.2015	19.06.2015 – 18.06.2024	10.03.2016 [valid for 5 years]	27.06.2016	Mining stopped due to interim orders of the Hon'ble NGT dt. 06.05.2022 passed in OA No. 306 of 2022 (Harbans Singh Vs State of Haryana & Ors).	No Violation	<u>Non- Operational</u>  • 5-25 ha* 5-25* [EC without EIA Study and Public hearing] [678]  • Contract (LOI) has expired.
26. <b>R27</b>	JAIDHAR BLOCK YNR B34  [25.60 ha]  BGS	M/s Saharanpur Mines Management Services Pvt. Ltd	06-07.07.2015	20.07.2015 – 19.07.2024	12.01.2016 [valid for 5 years]	20.08.2018	Mining Stopped due to interim orders of the Hon'ble NGT dt. 06.05.2022 passed in OA No. 306 of 2022 (Harbans Singh Vs State of Haryana &	No Violation	<u>Non- Operational</u>  • Contract (LOI) has now expired.

		4,60,000 TPA					ors).		
27. <b>R23</b>	NANDGARH BLOCK YNR B36  [29.60 ha]  BGS	M/s Apar Mines Managem ent Service Pvt. Ltd  57,70,000 TPA	06- 07.07.2015	20.07.2015 – 19.07.2023	10.03.2016 [valid for 5 years]	27.06.2016	As the condition of e- auction was violated by the bidder company by changing the director of the company, therefore, the mining contract was terminated vide orders dt 02.07.2020 of DGMG, Haryana.	No Violation	<u>Non- Operational</u>
28. <b>R28</b>	JAIRAMPUR JAGIR BLOCK YNR B6  [33.58 ha]  Sand	M/s Balaji Infra  15,20,000 TPA	05- 06.11.2015	30.11.2015 – 29.11.2026	10.06.2016 [valid for 5 years]	29.01.2022 & 24.05.2023	Mining stopped due to orders of the Hon'ble NGT dt 24.05.2022 passed in Appeal No. 19 of 2022.	No Violation	<b>Operational [/@834]</b>  <ul style="list-style-type: none"> <li>• Averred in OA that Mining is operational.</li> <li>• SEIAA Report dated 11.02.2024 [/@ 834] states its operational.</li> <li>• No replenishment study.</li> <li>• BGS Mining under EC for Sand Only</li> </ul>

**\* MINING CONTINUING IN AREA BETWEEN 5-25 HA ON THE BASES OF INVALID AND DEFECTIVE ECs THAT WERE WRONGLY ISSUED WITHOUT EIA STUDY AND INAPPLICABLE AS PER THE DIRECTIONS PASSED BY THIS HON'BLE TRIBUNAL IN SATENDRA PANDEY & DILEEP SINGH**

This Hon'ble Tribunal in the *Satendra Pandey v. MOEF [extracted in Para 5 @594]* partly quashed the MOEF Notification dated 15.01.2016 and directed that Category B-2 projects be brought at par with Category B-1 projects and accordingly, an EIA/ EMP study, and/or Public Consultation were made mandatory for all Mining leases having area above 5h.

This Hon'ble Tribunal vide its Judgment dated 1.07.2022 in the case of *Dileep Singh v. State of UP [/@591-596]* directed SEIAA, UP to re-visit ECs that were operating/ granted without an EIA study, EMP and/or Public Consultation and opined that the same was impermissible in light of the Judgment passed by the Hon'ble Supreme Court in *Deepak Kumar* and this Hon'ble Tribunal in *Satendra Pandey*.

The Relevant portion of the judgment is extracted as below:

*“5. The Tribunal held in Satendra Pandey’s case (supra) that the directions in Deepak Kumar (supra) cannot be diluted by any administrative orders or notifications and laid down procedures have to meet the mandate of judgment of the Hon’ble Supreme Court. Observations of this Tribunal are as follows:*

*“xxx .....xxx.....xxx*

*22. For all these reasons, we direct that the procedure laid down in the impugned Notification be brought in consonance and in accord with the directions passed in the case of Deepak Kumar (supra) by (i) providing for EIA, EMP and therefore, Public Consultation for all areas from 5 to 25 ha falling under Category B-2 at par with Category B-1 by SEAC/ SIEAA as well as for cluster situation wherever it is not provided; (ii) Form-1M be made more comprehensive for areas of 0 to 5 ha by dispensing with the requirement for Public Consultation to be evaluated by SEAC for recommendation of grant EC by SEIAA instead of DEAC/DEIAA; (iii) if a cluster or an individual lease size exceeds 5 ha the EIA/EMP be made applicable in the process of grant of prior environmental clearance; (iv) EIA and/or EMP be prepared for the entire cluster in terms of recommendation 5 (supra) of the Guidelines for the purpose of recommendations 6, 7 and 8 thereof; (v) revise the procedure to also incorporate procedure with respect to annual rate of replenishment and timeframe for replenishment after mining closure in an area; (vi) the MoEF&CC to prepare guidelines for calculation of the cost of restitution of damage caused to mined-out areas along with the Net Present Value of Ecological Services forgone because of illegal or unscientific mining.”*

*6. In the light of above, the MoEF&CC has issued revised procedure in terms of Enforcement and Monitoring Guidelines for Sand Mining 2020 (EMGSM-2020) inter-alia requiring replenishment study by way of para 5 and preparation of mining plan by way of para 4.3.*

*7. According to the applicant, EC already granted could also not be enforced being in conflict with the judgment of the Hon’ble Supreme Court in Deepak Kumar (supra) and should have been revoked.*

*8. It is undisputed that neither any replenishment study has been undertaken till date nor any EIA and EMP have been submitted nor other requirements, in terms of judgment of the Hon’ble Supreme Court and the guidelines, including public consultation, complied.*

*9. In view of above undisputed facts, we direct SEIAA, UP to revisit the EC and related issues as per law, including the SSMG-2016 and EMGSM-2020, within two months. It will be open to the parties to put forwarded their viewpoint, if any, before SEIAA, UP. Pending such consideration, the interim order will continue.”*

It is thus submitted that the ECs granted in respect of 6 Mining leases mentioned at Serial No. 5,9,15,23,24 and 25 (of Annexure A-1) are defective, invalid and *void-ab-initio* having being granted without any EIA Study/ EMP and/or Public Consultation; contrary to the Judgment dated 13.09.2018 passed by this Hon'ble Tribunal in the case of *Satender Pandey v. MOEF and in Dileep Singh*, and ought to be quashed and/or re-appraised afresh after undertaking an EIA study, EMP and Public Consultation.

**REPLENISHMENT STUDY – NOT CONDUCTED FOR A MAJORITY OF THE SAND GHATS**

The MOEF under the Sand Mining Guidelines i.e. SSMG, 2016 & EMGSM, 2020 highlighted the importance of a Replenishment study for Riverbed mining which is mandatorily required to nullify the adverse impacts arising due to excessive sand extraction.

This Hon'ble Tribunal vide its detailed Judgment dated 26.02.2021 in the case of '*NGT Bar Association v. Virender Singh*' directed that a periodic inspection & Replenishment Study be conducted by a five-member Committee comprising of the SEIAA, CPCB, State PCB and two expert members of the SEAC. The Status Report dated 11.02.2024 reveals that 20 out of the 28 Mining leases are located in the River bed wherein Replenishment studies have only been conducted in respect of 4 Mining leases. Notably, Serial No. 6,11, and 13 as per Annexure A-1 [Respondent No. 12, 16 and 18] are operational, wherein mining operations are being carried on without any Replenishment study.

The Report dated 11.02.2024 submitted SEIAA merely states that "*the project proponent (mineral concession holder) shall submit an annual replenishment study certified by an authorized agency. Further, 06b monthly compliance report of the EC conditions is directly submitted to the SEIAA/MoEF&CC as the case may be & HSPCB. Hence, submission of the annual replenishment report is also part of 06 monthly compliance report and the same is to be submitted to the said agencies (SEIAA/MoEF&CC as the case may be & HSPCB)*" [2337], without mentioning whether the condition has been complied with.

**NO POST MONITORING COMPLIANCE**

The Applicant has stated in the OA, and also in the Objections dated 28.04.2024 that in none of the 28 Mining leases, (operational and Now non-operational), at any point of time, No Post monitoring compliance was done, as mandated under the EIA, 2006. However, the SEIAA, Haryana in both its Reports is absolutely silent on this aspect.

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## PROOF OF SERVICE

## O.A. NO. 593/2023 MURSALEEN VS STATE OF HARYANA &amp; ORS

1 message

Dalmia Law Office &lt;dalmialawoffices@gmail.com&gt;

Tue, Aug 6, 2024 at 9:35 PM

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Sir,

Kindly find the attached Objections to the Status report filed by SEIAA in the above captioned matter.

Regards

Chambers of Vanshdeep Dalmia

Advocate on Record

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 Final - Objections to report dt 24.6.24 - Mursaleen.pdf  
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