

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI
ORIGINAL APPLICATION 193 OF 2022

IN THE MATTER OF:

RAJJAN PANDEY

... APPLICANT

VERSUS

STATE OF U.P. & ORS.

... RESPONDENTS

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THROUGH

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PLACE: NEW DELHI**DATE:- 01.05.2023**

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**PRINCIPAL BENCH AT NEW DELHI****ORIGINAL APPLICATION 193 OF 2022****IN THE MATTER OF:**

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**RESPONSE TO THE JOINT COMMITTEE REPORT DATED 09.12.2022 AND
24.04.2023 ON BEHALF OF THE APPLICANT****MOST RESPECTFULLY SHOWETH:**

1. That the Applicant had filed a letter petition before this Hon'ble Tribunal regarding the illegal mining, crushing and blasting in the hills of Village Nahri, Gata no. 156,218,309, 501, 587, 588, 589 and 601 and hills of Village Khalari, Gata No. 54,144,145, Distt. Banda, Uttar Pradesh in violation of the environmental norms. The Applicant had submitted that the illegal mining and blasting was causing air and water pollution in the surrounding area due to which the lives of nearby villagers and their cattle were in danger. It was also submitted that because of blasting, houses of the villagers had been destroyed and water of the pond became poisonous due to which many cattle had died.
2. That by order dated 10.03.2022, this Hon'ble Tribunal had formed a Joint Committee with members from State PCB, Director Mining and Geological Department, DFO and District Magistrate-Banda (Uttar Pradesh) to undertake site visit and look into the grievance of the Applicant. Further, by order dated 13.07.2022, this Hon'ble Tribunal further included the representatives of CPCB and SEIAA. The relevant portion of the order is reiterated below:

"4. Vide order dated 13.07.2022, we included the representatives of CPCB and SEIAA in the Joint Committee constituted on 10.03.2022 and directed the re-constituted Joint Committee to visit the mining

sites in question, look into the grievances of the applicant pointwise, verify the facts regarding compliance with environmental norms and EC conditions by the Project Proponent and take appropriate remedial action as may be required by following due process of law and to furnish Factual and action taken report within three months."

3. That the said Joint Committee submitted its report by UPPCB vide letter dated 9.12.2022 after conducting a site visit in the said location. However, vide order dated 24.02.2023, this Hon'ble Tribunal directed the Joint Committee to undertake another site visit to verify the factual position regarding the grievances in the application and compliance with EC and CTE/CTO consent conditions by each of the Project Proponent respectively and submit its report. The relevant portion of the order dated 24.02.2023 is reproduced below:

"4. In view of the averments made in the application and observations made in the report of the Joint Committee and attending facts and circumstances of the case particularly the fact that the mining operations in all the mines except M/s Harshit Enterprises were closed at the time of visit of the Joint Committee, the Joint Committee is directed to undertake visits to the site in question again and verify the factual position regarding the grievances in the application and compliance with EC and CTE/CTO consent conditions by each of the Project Proponent respectively and submit its report within two months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF."

It is submitted that the Joint Committee submitted its report by UPPCB vide letter dated 24.04.2023. Hence, the Applicant would like to raise the submissions below with respect to the response to the Joint Committee Report dated 24.04.2023.

Response to the Joint Committee Report dated 9.12.2022 and 24.04.2023:

A. Deficiencies in the Joint Committee Reports:

4. That the Joint Committee Report was silent or had not properly addressed on the following points which were raised by the Applicant in his letter petition:
 - a. That there is one natural pond in the village which is a major source of drinking water for the cattle. Since the mining activity has started, due to the blasting activity undertaken by the mine lease holders, the water in

pond has become extremely contaminated because of which numerous cattle of the village have died.

- b. That there are many ancient Temples and holy statues present on the hills near the mines which are getting damaged from the debris and affecting the residents' right of passage to these ancient temples.
- c. That the hills near the village are abundant in a variety of medicinal plants and various species of wildlife animals. Since, the mining activity has started, countless essential forest produces and medicinal plants have been ruined and a great number of wildlife animals had to migrate from the said location.

It is submitted that the Joint Committee failed to note the above-mentioned contentions raised by the Applicant in its letter petition in both its reports dated 9.12.2022 and 24.04.2023.

5. That the Applicant had raised the issue of contaminated and poisonous water of the pond which was a major drinking source of water for the cattle. To this, the Joint Committee Report dated 9.12.2022 had noted that there is a possibility that recharge point of the pond will get disturbed as well as the pond will get polluted through the surface runoff water from these mining areas. It further stated that no impacts were visually present regarding the effect of recharge point of the pond and the polluted levels of the water. However, it failed to conduct a test the quality of the water and check the standard quality of the water as contended by the Applicant in the letter petition. (Para 13.4) Also, the Joint Committee Report dated 24.04.2023 had again not taken this issue seriously and did not undertake water sampling again to ascertain the suitability of the water in the pond.
6. That as per images attached in, the Joint Committee Report dated 9.12.2022, at pg. no. 164 showing Google Earth image of Gata no. 218 and 168, show the mine of Smt Jasmit Kaur Malhotra W/o Shri Rasmeet Singh Malhotra, Gata No. 218 (Khand No. 1 and 2) to be adjacent to the pond. Such close proximity of the two mines to the village pond is bound to contaminate it. Hence, the impact of the

mining on the pond cannot be ruled out "visually" without first checking its water quality standard and deeming it suitable for drinking purposes.

7. That further, the Applicant had also raised the issue of damage to the ancient temples present in the hills. However the Joint Committee, in both the reports failed to note any findings regarding the same. It is submitted that in 2020, a resident of the village namely Shri Santosh Kumar had lodged a complaint vide complaint no. I.G.R.S No. 60000200133465 dated 21.11.2020 on the CM portal. On reply to the complaint, the Tehsildar of village Naraini admitted that there is an ancient temple present between Gata no. 218 and 587 and had ordered for investigation from the mining department. However, no further action was taken. Therefore, due to exceeding blasting these ancient temples are getting damaged from the debris and affecting the residents' right of passage to the said temples. A copy of the complaint no. I.G.R.S No. 60000200133465 dated 21.11.2020 and its reply from the tehsildar of Naraini is annexed herewith as **ANNEXURE A/1**
8. That the Joint Committee also failed to note the impacts of mining on the forest and wildlife nearby which was raised by the Applicant in his letter petition. It is submitted that as per Pg. no. 164, at Gata No. 218, Pg. No. 167 at Gata No. 309 and Pg. No. 169 at Gata No. 587 (Khand No.1 and 2), the presence of varied flora and fauna is clearly visible. Further, there are numerous medicinal plants and rare wildlife species present here which are in serious danger of being destroyed and such indiscriminate mining has resulted in disturbance to the biodiversity of the area.
9. That further, both the Joint Committee Reports have failed to produce a copy of their Environmental Clearances, Consent To Establish and Consent to Operate letters for the proper adjudication of the matter. Also, the said documents are not available in the public domain for the Applicant to ascertain the correctness of the conditions imposed in the EC, CTE and CTO.

B. Findings of the Joint Committee Report noting illegalities, non-compliances and impact from the mine areas:

8. It is submitted that both the Joint Committee Reports noted that the blasting activities in the mines were undertaken without permission from the mining department for blasting. Also, the Committee further noted that due to such close proximity of the mines, it was bound to affect the residential area of the village as well as the agricultural field.
9. That the Joint Committee Report dated 9.12.2022 had noted the following observations which had confirmed the issues raised by the Applicant in his letter petition:
 - i. That the Applicant had contended that a majority of the population are relying on agriculture as source of livelihood. The blasting activities undertaken by these mines have resulted in extreme fugitive dust emissions which are affecting the agricultural fields in close proximity to the mines resulting in crop failure. To this, the Joint Committee Report noted that the agricultural lands were surrounded by most of the mining lease areas and the mining activities were in such close vicinity that it could adversely impact the crop yield in these areas.
 - ii. That further the Applicant had contended that the blasting activity in the mines were causing them trouble and damaging their houses as well as their agricultural lands. To this, the Joint Committee noted that "*considering the residential areas and agricultural lands located in the close proximity, the blasting operations should not be allowed*". (Para 17.5) It is submitted that the village being a hilly area means that there is very little land to cultivate. Also, almost 80% of the residents are dependent on agriculture as no other source of income is present in the village. The mining is damaging both their agricultural lands and houses which are majorly kutchcha houses, and may collapse with slight vibrations from the blasting. The blasting is also posing a risk to the life of the residents as flying debris can hit the residents anytime and such injury may be fatal. (Para 17.1.2)

A copy of the recent photographs showing debris from blasting affecting agricultural land is annexed herewith as **ANNEXURE A/2**

- iii. That the Applicant had also stated about rising water scarcity in the village. To this the said Report noted shallow groundwater table level (around 3 m BGL) in the area. It is clear that already the area is a drought prone area and therefore, if such rampant mining is allowed to be continued, it shall result in an increase in the risk of water scarcity amongst the residents. (Para 17.1.1)
 - iv. That the first site visit of the Joint Committee Report had also noted that all the 10 mines were operating without the mandatory Consent under Water and Air Act before starting the mining operations. When the Joint Committee conducted its second site visit as per the above-mentioned report, it noted that the eight of them had obtained valid Consent from UPPCB. However, obtaining Consent under Water Act and Air Act from UPPCB after starting of the mining operations does not absolve them from past violations.
10. That further, the Joint Committee Report dated 24.04.2023 had also noted and admitted the common non-compliances by all the 10 mines mentioned in the EC/Consent/Mining lease which are not listed in the above paragraph. These are:
- i. The conditions required funds earmarked for environmental protection measures to be kept in separate account and year wise expenditure to be provided to the MoEF, Regional Office, Lucknow and the State PCB. However, none of the mines had provided details about the funds earmarked for environmental protection measures to UPPCB (Para 8.1)
 - ii. The conditions required for sprinkling of water on haul roads to control dust by the Project Proponent. The Committee noted that no arrangement for sprinkling of water on haul roads to control dust was found in any of the mine (Para 8.2)
 - iii. The conditions required for maintenance of village roads used for transportation of minerals by the Project Proponents and to keep the roads black topped. On the contrary, the Committee noted that none of the village

road near these mining sites have been maintained and black topped by the proponents (Para 8.3)

- iv. The conditions required for the development of green belt around the mine areas. Further, details of year wise afforestation program including rehabilitation of mined out areas were to be submitted to the Regional Office, MoEF&CC, Lucknow. It is submitted that the Committee noted that the proposal for tree plantation and green belt development has been mentioned in the Environmental Management plans submitted by these mines. However, to date, no green belt related activity has been initiated on the ground by any of the mines. (Para 8.4)
- v. Also, the conditions required for appropriate arrangements for shelter and drinking water to be provided for all mine workers at the mining site. However, no such arrangement for shelter and drinking water has been provided by any mine. (Para 8.5)
- vi. The conditions required for rainwater harvesting activities in all the mines. However, no rainwater harvesting related activity to recharge the groundwater source was found in these mines. (Para 8.6)
- vii. The conditions required for the regular monitoring of all contamination and depletion in the ground and surface water (within 5.0 km of the lease) due to the mining activity. The monitoring data were also supposed to be submitted regularly to the Regional Office of MoEF, Lucknow and UPPCB. The Committee found one pond/lake located within 5 KM from these mines. The monitoring of this pond/lake has not carried out by any of the mine. (Para 8.7)
- viii. The conditions required for the controlling and monitoring of fugitive dust generation at locations of nearest human habitation (including schools and other public amenities located nearest to sources of dust. The records were then required to be submitted to the MoEF, Regional Office and UPPCB. However, no such reports were submitted to the UPPCB. (Para 8.8) It is submitted that the excessive emission of fugitive dust can't be ruled out as

both the village and the primary school lie at the base of the hill and the pollution from the mines are bound to affect the health of the residents especially children and senior citizens of the village.

- ix. That the conditions required for transportation of minerals to be done by covering the trucks with tarpaulin or other suitable mechanism so that no spillage of mineral dust takes place. The Committee noted that during visits, transportation was not found at site so status of the said condition could not be verified. However, in general, it had been observed that no such covering is being used during transportation. (Para 8.10) It is submitted that because of no covering of trucks done during transportation of minerals which spill all over and definitely pollute the public road and area in general.
- x. Further, the conditions required for Hydro geological study of the area to be conducted by the Project Proponent and if any adverse effect on ground water quality were to be observed, mining were to be suspended immediately. The Committee noted that no such study had been carried out by the mines. It is submitted that the study is crucial as the rain quantity is around 760 mm only, annually. (Para 8.11)
- xi. As for conditions related to blasting, blasting was required to be conducted as per Blast vibrations study submitted to the regional office of MoEFCC and UPPCB after obtaining permissions from the Mining Department. **It is submitted that the blast vibration study reports have not been submitted by any of the mine to UPPCB. And as informed by the mining department the mines have not obtained approval for blasting from them.** The Applicant has annexed pictures of effects of illegal blasting on agricultural fields and damage to the crops in **ANNEXURE A/2.** (Para 8.12.3)
- xii. That as per Para 4, 5 and 6 of the above-mentioned Joint Committee Report, it noted that there is no proper mechanism to verify the amount of material being extracted and transported by the lessee due to shortage of mining department staff. The committee also noted that there is not mine specific

data available with the mining office. Hence, it is important to note that there is no proper mechanism to monitor whether the quantity of stone mined from the mines is beyond the permissible quantity.

C. Non-Compliances/Illegalities observed by the Joint Committee Reports:

11. That both the Joint Committee Reports dated 9.12.2022 and 24.04.2023 had noted the following specific observations about the 10 mines (Respondents 9 to 18):

S.No	Mine Name and Details	Joint Committee Report dated 9.12.2022 observations:	Joint Committee Report dated 24.04.2023 observations:
i.	Smt Jasmit Kaur Malhotra W/o Shri Rasmeet Singh Malhotra, Gata No. 218 (Khand No. 1)	Mining area located near the pond which is used by cattle. It is submitted that therefore, surface run-off from the blasting activity has caused the pond to be contaminated.	<p>a. Mining site is located within 500 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and breathing related issues due to fugitive dust emissions from the mines.</p> <p>b. Mining site is adjacent to the pond. It is submitted that therefore, surface run-off from the blasting activity has caused the pond to be contaminated. It is further submitted that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.</p>
ii.	Smt Jasmit Kaur Malhotra W/o Shri. Rasmeet Singh Malhotra, Gata No. 218 (Khand No. 2)	Mining area located near the pond which is used by cattle. It is submitted that therefore, surface run-off from the blasting activity has caused the pond to be contaminated.	<p>a. Mining site is located within 500 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and breathing related issues</p>

			<p>due to fugitive dust emissions from the mines.</p> <p>b. Mining site is adjacent to the pond. It is submitted that therefore, surface run-off from the blasting activity has caused the pond to be contaminated. It is further submitted that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.</p>
iii.	Smt Amrit Kaur W/o Shri Ajit Singh Malhotra, Gata No. 587, 588 (Khand No. 8)	<p>a. Illegal mining pit found near the mine lease area.</p> <p>b. Blasting holes were also seen in the lease area and where the illegal pits were found.</p> <p>It is submitted that it is clear that the Joint Committee admitted in finding illegal mining activity undertaken outside the allotted mine lease area.</p>	<p>a. Mining site is located within 500 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and breathing related issues due to fugitive dust emissions from the mines.</p> <p>b. Mining site is within 5 km of the pond. It is submitted that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.</p>
iv.	M/s Jai Maa Sharda Traders- Shri Ram Milan S/o Shri Ramgopal, Gata No. 587 (Khand No. 1)	<p>a. Primary school is located at 84 m from the mine area.</p> <p>b. Public road is passing through the mining lease area.</p> <p>It is submitted that this mine is in very close proximity to both the school and the public road. Due to the blasting activity, both the school as well as</p>	<p>a. Mining site is located within 20 m of the Residential Area</p> <p>b. Distance of mining site to the primary school location is 84 m.</p> <p>c. Mine is adjacent to the public road.</p> <p>It is submitted that this mine is in very close proximity to the school and residential area. Also, it is adjacent to the public road. Due to the blasting activity, both the school as well as the</p>

		the public road is immensely affected from the flying debris damaging the structures.	residential areas are immensely affected from the flying debris damaging the structures. d. Mining site is within 5 km of the pond. It is submitted that that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.
v.	Shri Mujibuddin Siddiqui S/o Shri Jamiruddin Siddiqui, Gata No. 501	No specific observation provided	a. Mining site is located within 500 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and breathing related issues due to fugitive dust emissions from the mines. b. Mining site is within 5 km of the pond. It is submitted that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.
vi.	M/s S R Innovation L L P Pro-Shri Surrender Puniya, Gata No. 587 (Khand No. 07	No specific observation provided	a. Mining site is located within 500 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and breathing related issues due to fugitive dust emissions from the mines. b. Mining site is within 5 km of the pond. It is submitted that monitoring of ground and surface water near the core zone (within 5 km of

			the lease) has not been maintained by this mine.
vii.	Smt Amrit Kaur W/o Shri Ajit Singh Malhotra, Gata No. 587 (Khand No. 05)	No specific observation provided	<p>a. Mining site is located within 500 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and breathing related issues due to fugitive dust emissions from the mines.</p> <p>b. Mining site is within 5 km of the pond. It is submitted that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.</p>
viii.	M/s S S Granite Partner Shri Atique Ahmed, Gata No. 309	Illegal mining pit found outside the boundary of the mine lease area. It is submitted that it is clear that the Joint Committee admitted in finding illegal mining activity undertaken outside the allotted mine lease area.	<p>a. Mining site is located within 100 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and breathing related issues due to fugitive dust emissions from the mines.</p> <p>b. Mining site is within 5 km of the pond. It is submitted that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.</p>
ix.	M/s S R Innovation L L P Pro-Shri Surrender Puniya, Gata No. 587 (Khand No. 02)	No specific observation provided	<p>a. Mining site is located within 500 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and</p>

			<p>breathing related issues due to fugitive dust emissions from the mines.</p> <p>b. Mining site is within 5 km of the pond. It is submitted that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.</p>
x.	M/s Harshit Enterprises Partner Shri Harshit Singh, Gata No. 45	No specific observation provided	<p>a. Mining site is located within 500 m of the Residential Area. It is submitted that the blasting from these mines are affecting the living conditions of the village with their drinking water contaminated and breathing related issues due to fugitive dust emissions from the mines.</p> <p>b. Mining site is within 5 km of the pond. It is submitted that monitoring of ground and surface water near the core zone (within 5 km of the lease) has not been maintained by this mine.</p> <p>c. One stone crusher was found established near the mining site. It was said to be operated by M/s Baghel Infra. The mine has given the extracted quantity to the said stone crusher without applying for the required EMM 11 form and also, it does not have authorized records regarding the amount of material transported to the said crusher.</p>

12. That the location of the mines were found to be very close to the residential and agricultural lands. Such close proximity to the residential area is bound to affect

the life and property of the residents. Further, the location of the mines are also in contravention to the CPCB report submitted in in ***M. Haridasan & Ors. v. State of Kerala (O.A. 304 of 2019) (PB)***.

13. That the CPCB had filed its report dated 09.07.2020 regarding siting criteria to be considered for all stone quarries which was presented before this Hon'ble Tribunal vide order dated 21.07.2020 in ***M. Haridasan & Ors. v. State of Kerala (O.A. 304 of 2019) (PB)***. The relevant portion is reiterated below:

"3. Accordingly, the CPCB has filed its report on 09.07.2020 concluding as follows:

"6.0 Conclusion:

In view of available information, following minimum distance criteria may be considered for permitting stone quarrying by SPCBs:

<i>Mining Type</i>		<i>Mining Distance</i>	<i>Locations</i>
<i>A</i>	<i>When Blasting is not involved</i>	<i>100 m</i>	<i>Residential/Public buildings, Inhabited sites, Protected locations to be considered by States.</i>
<i>B</i>	<i>When Blasting is involved</i>	<i>200 m **</i>	

*****Note: The regulations for danger zone (500 m) prescribed by Directorate General of Mines Safety also have to be complied compulsorily and necessary measures should be taken to minimise the impact on environment.***

However, if any states is already having stringent criteria than the above for minor mineral mining (i.e. more prescribed distances than the above), the same shall be applicable."

4. In view of the above, the said criteria be followed throughout India. The CPCB may monitor compliance.

(Emphasis Supplied)

It is submitted that the siting criteria mentioned above required for all stone quarries to be at a minimum distance of 100 m when blasting was not involved. However, in the present case, blasting was involved in all the mines, hence, the location for the mining areas must be at a minimum distance of 200 m, which is not being maintained in the above-mentioned mines. It is pertinent to note that the said areas of the mines are on hills and the close proximity of the mining areas

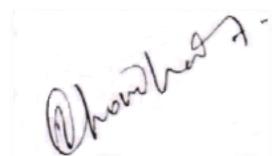
to the village, the primary school, the pond as well as the public road is bound to affect the safety of the residents due to the fact, that the flying debris from a height can injure anyone or damage any property. Also, the debris from the inclined height of the mines is bound to fall in the pond and contaminate it.

14. That accordingly, the Joint Committee has noted multiple illegalities and non-compliances of the EC conditions/CTE or CTO conditions/mining lease conditions granted to all the mines in both its reports dated 9.12.2022 and 24.04.2023. Further, the mines are also in close proximity to the residential areas and agricultural fields in the said villages. Also, the blasting activities undertaken by the mines are without permission granted from the mining department and are hence, illegal causing huge inconvenience to the residents of the village in terms of life and property. Consequently, the project proponents of the mines have violated the EC conditions and are liable to pay compensation for the damage caused to the residents of the village, damage to the agricultural lands, and other damages to the ecology of the area.

THROUGH



RITWICK DUTTA



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DATE:- 01.05.2023

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महोदय,
 I.G.R.S. शिकायत संख्या 60000200133465 आवेक
 संशोधन पत्र-पता मठ गरी बंडनवरी तबलीब मंडली (मंडली)
 संख्या में आख्या निम्नवत है।
 शिकायतकर्ता द्वारा अंग्रेजी भाषा में निम्नलिखित बातों का
 पत्र संलग्न किया गया है जिसमें कहा गया है कि ग्राम नंदरी
 व ग्राम खलसी के अन्तर्गत स्थित पहाड़ों के खनन थड़े तथा
 उेशरों को खाने की स्वीकृति शासन/प्रशासन द्वारा
 की गयी है जिन्हे निरस्त कर दिया जाये।
 उक्त के सम्बन्ध में अधिकारीय जांच की गयी जिसमें
 पता गया कि ग्राम नंदरी की खलसी का C.P. 24-1429 का
 खाना 892 में गाटासं 156/8/80 है, गाटासं 210/8345 है
 गाटासं 309/15.250 है, गाटासं 50/11 210 है, गाटासं
 587/38 389 है, गाटासं 588 क/1-238 है, गाटासं 589
 रसा 1-376 है व गाटासं 601 रसा 3-804 है व गाटा
 स 634 रसा 6014 है कुल पहाड़ का रसा 74-523 है पहाड़
 के पत्र संलग्न है।
 उक्त गाटासं 218, 309, 501, 587, 634 में खनिज
 विभाग द्वारा पत्थर खनन के दस्तावेज पत्र किये
 गये हैं। आते वक द्वारा पत्रों में कहा गया है कि गाटा
 स 218 व 587 के पहाड़ों में खनिज का खनिज
 तथा पुराने मंदिर आदि हैं। खनिज के पत्रों में
 गये हैं जो खनिज खनन हैं। जिन्हे कहा गया है कि
 गाटासं 218 तथा 587 में खनिज का खनिज
 और खनिज का खनिज को खनिज गाटासं पहाड़ के खनिज
 में आबादी स्थित है। तथा खनिज का खनिज
 स्थलीय जांच के अनुसार उक्त पहाड़ों के खनिज
 आबादी स्थित है तथा बोते बोते को खनिज का खनिज
 उक्त के सम्बन्ध में आमन्त्रियों से पूछताछ की गयी जिसमें
 बताया गया कि उक्त पहाड़ों में आमन्त्रियों से खनिज
 और खनिज का खनिज वर्ग में खनिज खनिज का खनिज
 रखा है। उक्त खनिज को खनिज खनिज का खनिज
 बो रहा है।
 उक्त स्थिति को खनिज का खनिज का खनिज का खनिज
 किये जाने के सम्बन्ध में आख्या के बारे में खनिज का खनिज

महोदय,
 खनिज विभाग द्वारा पहाड़ के पत्रों के खनिज का खनिज
 खनिज के खनिज का खनिज का खनिज का खनिज का खनिज
 गाटासं 218 व 587 पहाड़ के पत्रों में खनिज का खनिज
 है। खनिज का खनिज का खनिज का खनिज का खनिज का खनिज
 पहाड़ निरस्त कर दिया जाये।
 खनिज विभाग द्वारा किया जाता है आख्या संलग्न
 प्रेषित।
 23/11/2020
 (N)

महोदय,
 खनिज विभाग द्वारा पहाड़ के पत्रों के खनिज का खनिज
 खनिज के खनिज का खनिज का खनिज का खनिज का खनिज
 गाटासं 218 व 587 पहाड़ के पत्रों में खनिज का खनिज
 है। खनिज का खनिज का खनिज का खनिज का खनिज का खनिज
 पहाड़ निरस्त कर दिया जाये।
 खनिज विभाग द्वारा किया जाता है आख्या संलग्न
 प्रेषित।
 23/11/2020
 (N)

ANNEXURE A-2

Photographs showing mining debris from blasting falling on the agricultural fields:



Photograph showing mining and creation of fugitive dust and trucks not covered with tarpaulin sheet:



**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI
VAKALATNAMA**

Original Application No. 193 of 2022

In re:

Rajjan Pandey _____ Applicant

V E R S U S

State of Uttar Pradesh & Ors. _____ Respondent

KNOW ALL to whom these present shall come that
Rajjan Pandey

_____ the above named **Applicant**
hereby appoint (herein after called the advocate/s) to be my/our Advocate
the above noted case authorized him :-

Ritwick Dutta **Rahul Choudhary, Advocate**
N-73, Lower Ground Floor, Greater Kailash-1, New Delhi-110048
Tel:- 011+49537774

To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in any appellate Court including High Court subject to payment of fees separately for each Court by me/ us. To sign, file verify and present pleadings, applications, cross objections or petitions for execution review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages.

To file and take back documents to admit and/or deny the documents of opposite party.

To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case. To take execution proceedings. The deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case. To appoint and instruct any other Legal Practitioner, authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think it to do so and to sign the Power of Attorney on our behalf.

And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purposes.

And I/We undertake that I / we or my /our duly authorized agent would appear in the Court on all hearings and will inform the Advocates for appearance when the case is called.

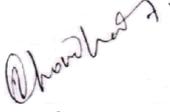
And I /we undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court shall be of the Advocate, which he shall receive and retain himself.



And I /we the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the Advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once the fee is paid. I /we will not be entitled for the refund of the same in any case whatsoever. If the case lasts for more than three years, the advocate shall be entitled for additional fee equivalent to half of the agreed fee for every addition three years or part thereof.

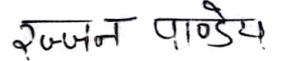
IN WITNESS WHEREOF I/We do hereunto set my /our hand to these presents the contents of which have been understood by me/us on this 29 day of 04 2023.

Accepted subject to the terms of fees.



Advocate

Client



Client