

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

IA NO. 522 OF 2025

IN

ORIGINAL APPLICATION NO. 248/2022

IN THE MATTER OF:

NEWS ITEM PUBLISHED IN THE HINDU DATED 27.03.2022

TITLED " DIGGING UP THE CHAMBAL "

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Place: New Delhi

Date: 29.01.2026

Filed by:

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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

IA NO. 522 OF 2025

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IN THE MATTER OF:

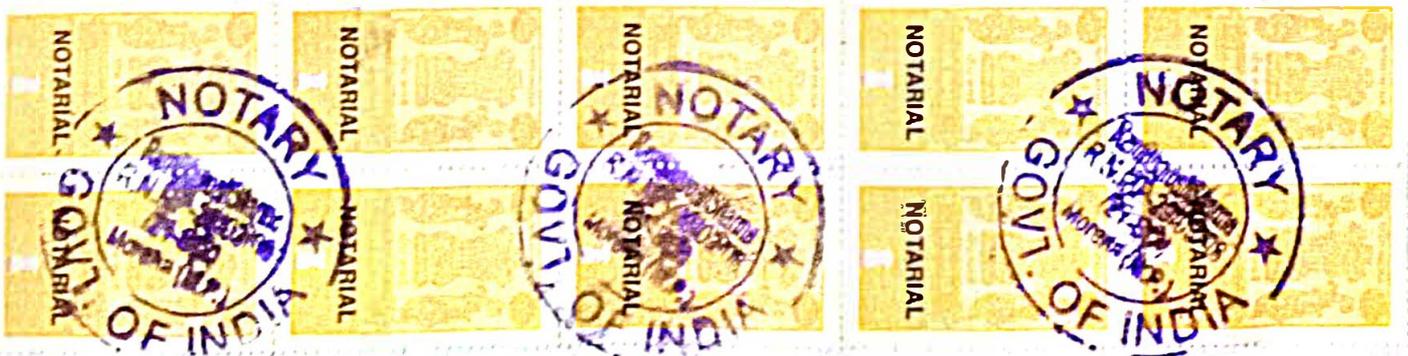
NEWS ITEM PUBLISHED IN THE HINDU DATED 27.03.2022 TITLED  
"DIGGING UP THE CHAMBAL"

REPLY-AFFIDAVIT ON BEHALF OF RESPONDENT NO. 1-STATE OF  
MADHYA PRADESH TO IA NO. 522 OF 2025 TITLED "APPLICATION  
OF DIRECTION" FILED BY CONSERVATION ACTION TRUST AND  
DEBI GOENKA

I, Harish Chand Baghel s/o Shri Manak Chand Baghel, aged about 56 years,  
presently working at Divisional Forest Officer Morena, do hereby solemnly  
affirm and state as under: -

*रामभद्रा शर्मा (पुत्र)*  
*सो.स. मं. नं. ११०२२*

1. That I am the Officer in charge, and as such, I am fully conversant with  
the facts and circumstances of this case.



2. The present original application was registered by this Hon'ble Tribunal in exercise of its suo-moto jurisdiction. The present application is concerning the illegal mining near the National Chambal Sanctuary which is resulting in pollution in the area, adversely affecting the environment and public health.

3. That the present reply-affidavit is being filed pursuant to IA No. 522 of 2025 filed by Conservation Action Trust and Debi Goenka. This Hon'ble Tribunal vide orders dated 01.09.2025 and 27.11.2025 had given time to the answering Respondent to file their response to the said applications.

4. It is pertinent to first set out the prayers sought under IA No. 522 of 2025 as they are essentially directions calling for the State to take steps to clamp down on the illegal mining in and around Morena town. The prayers as set out in IA No. 522 of 2025 are as follows:

*"In view of the facts and circumstances, this Hon'ble Tribunal may be pleased to pass the following directions:*

- a. Direct for setting up of check posts as mandated under Enforcement & Monitoring Guidelines for Sand Mining, 2020 for continuous surveillance of illegal mining activities at critical entry and exit points leading to and from Chambal River, near the Forest Department Rest*

House/Gharial breeding center and Morena town (in Madhya Pradesh) and between Sagar pada in Dholpur district and the Chambal River (in Rajasthan);

- 
- b. Direct for setting up CCTV surveillance as mandated under Enforcement & Monitoring Guidelines for Sand Mining, 2020 near the Forest Department Guest House /the Gharial breeding center at Morena, leading to Morena town (in Madhya Pradesh) and along the Sagar pada – Dholpur road to Chambal River (in Rajasthan);
- c. Direct for usage of drones for monitoring the area at all roads leading to Chambal River from Morena on Madhya Pradesh and Dholpur on Rajasthan side;
- d. Direct for deployment of forces that are equipped with appropriate arms and vehicles to patrol both sides of the River Chambal;
- e. Direct for protection of ravines within the Chamal Sanctuary and its Eco Sensitive Zone for their significant ecological importance;
- f. Direct the authorities to provide status on sand mining on each of the location mentioned in the present Application;
- g. Pass any other order as this Hon'ble Tribunal may deem fit in the facts and circumstances of the present case."

5. The answering Respondent craves leaves of this Hon'ble Tribunal to reply to the present IA by replying to each of the prayers which are part of the present IA under reply as such:

- 
- a. It is submitted that for setting up of check posts and CCTV on the entry and exit points leading to and from Chambal River, near the Forest Department Rest House/ Gharial breeding Morena town (in Madhya Pradesh), proposals have been sent to the Collector, District Morena and Superintendent of Police, Morena for conducting joint inspection and to earmark places where the check posts can be set up. A copy of the letter dated 15.01.2026 has been annexed herewith and marked as **Annexure A1**.
- b. It is submitted that in the Morena District, there is one drone being used for surveillance. Proposal for the procurement of a new drone has been submitted to the higher authorities.
- c. At the sanctuary, there are 17 officials posted at Deori, 21 officers are posted at Ambah/Bhind, 15 officers are posted at Sabalgarh. Apart from this, 20 Special Action Force (SAF) Jawans have also been posted at these places. Photographs showing the officers at the Sanctuary is annexed herewith and marked as **Annexure A2**.
- d. It is stated that the answering Respondent has taken various steps to curb sand mining in the areas and also to protect the ravines. Details

of various steps taken have also been enumerated in the revised affidavit dated 08.10.2025 before this Hon'ble Tribunal.

6. That the answering Respondent humbly craves leave of this Hon'ble Tribunal to adduce additional facts by way of additional affidavit as may be deemed necessary for the proper adjudication of the instant application by this Hon'ble Tribunal.



*[Signature]*  
DEPONENT

**VERIFICATION:**

I, the deponent named above, do hereby verify that the contents of the above affidavit are believed to be true and correct on the basis of the information derived from the record of the case and nothing material has been concealed therefrom.

Verified at on this 29 day of 1, 2026 at Mumbai

*[Signature]*  
DEPONENT

प्रमाण - आज दिनांक - 29.1.26  
श्री. रमेश शर्मा पुत्र श्री. श्री. रामेश्वर शर्मा  
गात कपूर निवासी. श्री. रामेश्वर शर्मा  
रामना कपूर जिसको प्यय श्री. श्री. रामेश्वर शर्मा  
परा जानता है। शपथपत्र पर उपरोक्त कथन कि  
और जिसके हस्ताक्षर सज्जन हैं। जिसका दिनांक  
नका श्री. रामेश्वर शर्मा

552  
रमेश शर्मा (पंचोरा)  
कोटेरी मुरैना (मठमठ)

## कार्यालय वन मण्डलाधिकारी, सामान्य वनमण्डल मुरैना (म0प्र0) 1766

Email ID:- [dfotmorena@mp.gov.in](mailto:dfotmorena@mp.gov.in)Address:- ए0बी0 रोड फॉरेस्ट कॉलोनी, मुरैना  
मुरैना म.प्र. पिन-476001

क्रमांक/सरक्षण./26/

528

मुरैना दिनांक/15/01/2026

प्रति,

1. कलेक्टर  
जिला मुरैना मध्यप्रदेश
2. पुलिस अधीक्षक  
जिला मुरैना मध्यप्रदेश

विषय :- OA No. 248/2022 (NGT, Principal Bench) – “Digging up the Chambal” के अनुपालन में ईको सेंटर देवरी से चम्बल राजघाट के मध्य (राष्ट्रीय राजमार्ग -3) पर चेक पोस्ट एवं CCTV आधारित निगरानी प्रणाली स्थापित किए जाने के संबंध में।

- संदर्भ :- 1. OA No. 248/2022 – “Digging up the Chambal” माननीय राष्ट्रीय हरित अधिकरण, NGT, Principal Bench Delhi में लंबित प्रकरण  
2. राज्य शासन के अधिवक्ता द्वारा दिनांक 02.01.2026 को प्रेषित ई-मेल

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विषयान्तर्गत अनुरोध है कि, माननीय राष्ट्रीय हरित अधिकरण, प्रधान पीठ, नई दिल्ली में लंबित प्रकरण OA No. 248/2022 “Digging up the Chambal” में चम्बल नदी के पारिस्थितिकी तंत्र, वन्यजीव (विशेषतः घड़ियाल, कछुआ एवं जलीय जैव विविधता) तथा नदी के प्राकृतिक प्रवाह की रक्षा हेतु अवैध रेत उत्खनन एवं परिवहन पर कठोर नियंत्रण के निर्देश दिए गए हैं।

उक्त प्रकरण में राज्य शासन के अधिवक्ता द्वारा अपने मेल दिनांक 02.01.2026 में यह विशेष रूप से इंगित किया गया है कि राष्ट्रीय राजमार्ग - 3 पर राष्ट्रीय चंबल अभयारण्य मुरैना के राजघाट और वन विभाग विश्राम गृह एवं घड़ियाल प्रजनन केन्द्र (ईको सेंटर) देवरी के निकट स्थित प्रवेश-निकास मार्गों पर स्थायी चेक पोस्ट एवं CCTV निगरानी व्यवस्था विकसित करने हेतु लेख किया है।

उक्त संबंध में ज्ञात है कि, ईको सेंटर देवरी से चम्बल राजघाट के मध्य राष्ट्रीय राजमार्ग वह प्रमुख मार्ग है, जिसके माध्यम से चम्बल नदी क्षेत्र से निकलने वाले वाहन ट्रैक्टर-ट्रॉली, ट्रक एवं डंपर गुजरते हैं और जिससे अवैध रेत परिवहन की सम्भावना बनी रहती है।

अतः उक्त संबंध में आपसे अनुरोध है कि, पुलिस विभाग एवं वन विभाग की संयुक्त स्थायी चेक पोस्ट एवं CCTV निगरानी व्यवस्था विकसित करने हेतु संयुक्त मौका निरीक्षण कर स्थान चिन्हित कर उक्त संबंध में वैधानिक कार्यवाही हेतु प्रस्ताव प्रेषित है।

सलंगन :- उपरोक्तानुसार

  
वनमण्डलाधिकारी

सामान्य वनमण्डल मुरैना

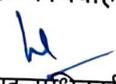
मुरैना दिनांक/15-01-26

क्रमांक/सरक्षण/26/

529

प्रतिलिपि:-

मुख्य वन संरक्षक वन वृत्त ग्वालियर की ओर सूचनार्थ एवं आवश्यक कार्यवाही हेतु सादर प्रेषित है।

  
वनमण्डलाधिकारी

सामान्य वनमण्डल मुरैना



Latitude: 26°39'22"  
Longitude: 77°54'28"  
Elevation: 113.21±31.4 m  
Accuracy: 6.083 m  
Time: 12-01-2026 16:09  
Note: Raajghat GHAT

Powered By NoteCam









Latitude: 26.654888  
Longitude: 77.906472  
Elevation: 114.57±3.64 m  
Accuracy: 3.79 m  
Time: 12-08-2025 15:31  
Note: rajghat



