

IN THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH SITTING AT NEW DELHI
ORIGINAL APPLICATION NO. 480 OF 2022

BETWEEN :

KULDEEP

APPLICANT

V/S

STATE OF HARYNA

RESPONDENTS

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New Delhi

Date:

FILED BY
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IN THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH SITTING AT NEW DELHI
ORIGINAL APPLICATION NO. 480 OF 2022

BETWEEN :

KULDEEP

APPLICANT

V/S

STATE OF HARYANA

RESPONDENTS

**RESPONSE BY THE RESPONDENT M/S SHIVA STONE CRUSHER TO
THE OA 480 of 2022 AS PER DIRECTION OF THIS HON'BLE TRIBUNAL
DATED 22.11.2023**

MOST RESPECTFULLY SHOWETH

1. That the present response is being filed on behalf of M/s Shiva Stone Crusher co through its partner, in pursuance of the liberty granted by this Hon'ble Tribunal vide order dated 22.11.2023 to place on record its detailed response/submission on the observation of the Joint Committee in the inspection report. The present response may be read in addition to the comprehensive reply/counter affidavit submitted by answering respondent on the allegations grievance in the present application is regarding running of stone crushers in Birhi Kalan, District Charkhi Dadri in violation of Haryana Government notification dated 11.05.2016 and the environmental norms.

A. BRIEF FACTS OF THE CASE ARE:

1. The grievance in the present application is regarding running of stone crushers in Birhi Kalan, District Charkhi Dadri in violation of Haryana Government notification dated 11.05.2016 and the environmental norms.
2. Vide order dated 12.08.2022, this Tribunal constituted a Joint Committee comprising of HSPCB, District Agricultural Officer and Deputy Commissioner, Charkhi

Dadri with direction to verify the factual position and submit Factual and Action Taken Report.

3. That an interim report was filed by the HSPCB dated 31.10.2022 regarding complying and non-complying units , it is germane to mention here that the answering respondent was found complying with all the conditions as per the norms and the inspection was conducted on 20.10.2022 and thereafter sought 2 months time to file action taken report.
4. That as per order dated 03.11.2022 in the present matter joint committee was directed to visit the stone crushers individually. As per the directions HSPCB issued notice to the answering respondent to attend hearing before the committee constituted by Ho'ble NGT .
5. It is submitted vide order dated 13.09.2023 Joint Committee was directed to verify the factual position regarding compliance with consent conditions and environmental rules/norms/regulations by all the stone crushers operating in Birhi Kala Zone and submit its report suggesting remedial measures and was directed to share the copies of the report with statutory authorities and also with the Project Proponents for remedial action.
6. That on the basis of above order joint committee inspected the answering respondent on 09.10.2023 to ensure the installation of pollution control measures as per notification dated 11.05.2016.
7. That a show cause notice for closure/prosecution and levy of Environmental Compensation under section 31 A of the Air Act, 1981 notice no. HSPCB/CD/2022/913 was issued by HSPCB on 11.10.2023 is hereby marked as **ANNEXURE 1**
8. According to the show cause notice some minimal deficiency was observed at site of the answering respondent:

- Covered shed Partially provided and found broken on vibratory screen/cone section .
 - Dust Suppressing System not maintained and provided as per notification dated 11.05.2016
9. It is pertinent to mention here that vide letter dated 02.11.2023 answering respondent reply to the show cause notice dated 23.10.2023 of HSPCB in which the answering respondent apprised about the corrective measures they have implemented after the inspection of the HSPCB. Given below the corrective measures to address the issue of broken shed mentioned in the report :
- We have Implemented the corrective measures to address the issue of broken shed mentioned in the report thereafter answering respondent covered with new tin shed and the broken shed has been repaired with immediate effect .
 - It is submitted that at present every deficiency is cured by the answering respondent and present status is that stone crusher is fulfilling with all conditions falling on them. We kindly request for a re-inspection and collect the samples again for testing the applicable parameters.

It has been prayed to the HSPCB to re-collect the samples which would give more accurate position of the current state of the plant. True Copy of the Reply by answering respondent is hereby annexed as **ANNEXURE 2**

10. That answering respondent has been operating at all times with a valid consent from HSPCB under provisions of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of pollution) Act, 1981 and the consent with the validity till 31.03.2028. True Copy of the consent to operate is hereby annexed as **ANNEXURE 3**

11. It is submitted that answering respondent only after full compliance under the provisions had been achieved and after the Central Ground Water Authority was satisfied regarding the efficacy of answering respondent . True Copy of the CGWA NOC is hereby annexed as **ANNEXURE 4**
12. It is submitted that after the plantation in the premises of the stone crusher , answering respondent applied for the forest NOC which was duly received after the verification of plantation done as per Haryana Government Environment department Notification no. S.O 12/ C.A29/1986/Ss.5 and 7/2016 dated 11 may, 2016 . True Copy of the Forest NOC is hereby attached as **ANNEXURE 5**
13. It is pertinent to mention here that answering respondent earlier granted the renewal of stone crusher license wef 09-05-2020 to 08-05-2023 as per provisions of the Haryana Regulation and Control of Stone Crushers Rules, 1992, to run the crusher. It is further submitted that the answering respondent license is hereby renewed again and permission was granted for three years with effect from 09.05.2023 to 08.05.2023. True Copy of the Renewal granted by Department of Mines and Geology, Haryana is hereby annexed as **ANNEXURE 6**
14. As per the report answering respondent have valid consent to operate and was complying with conditions of consent to operate . That Stone crusher has metalled road proved for vehicular movement. It is submitted that green belt of approx 280 plants provided and plantation plan was verified by the DFO. It is submitted that water sprinkler , wetting and cleaning of the grounds provided.
15. That as per the notice received by the answering respondent on 23.10.2023. It is further submitted that 2 issues were raised in the show cause notice and both were cured by the answering respondent. That the 1st

issue pertains to broken shed is resolved and the same was repaired . It is further submitted that 2nd issue pertains to the dust suppressing system which is repaired and now in working conditions . True Photographs of the Stone Crusher is hereby annexed as **ANNEXURE A7**

16. That the answering respondent is committed to ensure that its operation adhere to the applicable environmental regulations and standards. All the deficiency found by the HSPCB has been cured and same can be verified via a re-inspection of the Stone Crusher Site.
17. With regard to the observation by the HSPCB, with respect to the defaults and issues ascribed to the answering respondent , the above mentioned submissions will make it abundantly clear that no fault can be attributed to the answering respondent.
18. It is respectfully submitted that not providing relief to the answering respondent will result in serious miscarriage of justice and will enable grave injustice to be perpetuated.

FILED BY
KANISHK CHAUDHARY,
HARSH VARDHAN SINGH RAJAWAT, CHETAN JADON
Advocate

FILED ON:

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Sec-62 , Noida , 201301
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9690051398



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Regional Office

Tele No. 01250-299707

ANNEXURE 1

Haryana State Pollution Control Board,

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"Ramkrishan Parisar" Lal Kothi Wali Gali, Ward No. 17, Loharu Road,
Charkhi Dadri - 127306

Email-hspcbrocd@gmail.com



No. HSPCB/CD/2023/ 976

Dated 23/10/23

To

M/s Shiva Stone Crusher,
Village Birhi Kalan, Charkhi Dadri

Sub: Show cause notice for closure/prosecution and levy of Environmental compensation under section 31A of the Air (Prevention & Control of Pollution) Act, 1981 & withdrawal the consent to operate granted under section 21/22 of Air (Prevention & Control of Pollution) Act, 1981.

Whereas your unit was inspected by concerned field Officer on dated 11.10.2023 to ensure the installation of pollution control measures as per notification dated 11.05.2016. During inspection unit found non-operational and following deficiencies were observed at site: -

1. The covered shed partially provided and found broken on vibratory screen/cone section.
2. Dust suppressing system not maintained and provided as per notification dated 11.05.2016.

Whereas unit will be liable to pay the environmental compensation in the terms of direction of the Board issued by order no. HSPCB/PLG/2021/2343-2350 dated 22.12.2021 as assessed by the Board as per methodology defined.

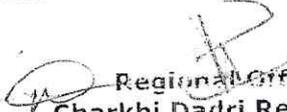
Thus, your unit is willfully & deliberately violating provision Air Act, 1981 and stone crusher notification 11.05.2016.

In view of above, you are hereby issued a show cause notice for 15 days for the non-compliance under Section 37/38, 31-A of the Air (Prevention & Control of Pollution) Act, 1981, as to why closure/prosecution, levy of Environmental compensation may not be issued against your unit along with revocation of consent to operate granted under section 21/22 of Air (Prevention & Control of Pollution) Act, 1981.

In case you fail to reply/comply with the deficiencies mentioned above within above mentioned stipulated period, it will be presumed that you have nothing to say in this regard and accept the status as mentioned above, which will warrant closure action against your unit under 31A of Air Act, 1981 besides revoking the consent to establish/consent to operate granted to your unit & initiation of legal action under the provision of Air (Prevention & Control of Pollution) Act, 1981 without giving any further notice. .

Explanations: For the avoidance of doubts, it is hereby declared that the power to issue directions under above said sections of Air Act (31-A) includes the power to direct: -

- (a) the closure, prohibition or regulation of any industry, operation or process or
- (b) the stoppage or regulation of supply of electricity, water or any other service


Regional Officer
Charkhi Dadri Region

Endst. No.

Dated

A copy of above is forwarded to the Chairman, Haryana State Pollution Control Board, Panchkula for information please.

Regional Officer
Charkhi Dadri Region

To

Regional Officer

Charkhi Dadri Region

Subject:- Reply Of Show Cause Notice No. HSPCB/CD/2023/976

R/s

On Dated 11.10.2023 Your Field Officer Inspected of our Unit & Found Some Non-Operational Deficiencies Observed.

1. Coverd shed Partially Broken
2. Dust Suppressing System Not Maintained

Whereas, After Inspected By Officer We Covered Broken Shed by New Tin shed & all Other Jaw Shed are also covered with New Tin shed & At This Time our Unit Fulfill all Conditions of Section 21/22 of Air Act 1981

So, we Requested to Re-visit for Inspect Our Unit .

We enclose Photos of new Tin shed with this Letter.

M/s Shiva Stone Crusher

Birhi Kalan (Charkhi Dadri)

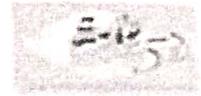
Date:- 2.11.2023

Shiva Stone Crusher
2.11.23
Partner



HARYANA STATE POLLUTION CONTROL BOARD

SCF-32, sector 13, HUDA, Bhiwani Ph. 01664-240259 Email:- hspcbrojr@gmail.com
E-mail: hspcb@hry.nic.in



No. HSPCB/Consent/1313129223CRDCTOAJ36872234

Dated:06/05/2023

To,
M/s SHIVA STONE CRUSHER
M. NO. 83, KILA NO. 5(7-7) AND 6(4-13) at VILLAGE-BIRHI KALAN, DISTT-
CHARKHI DADRI

Subject: Grant of consent to operate to M/s SHIVA STONE CRUSHER.

Please refer to your application no. 36872234 received on dated 2023-04-29 in regional office Bhiwani. With reference to your above application for consent to operate, M/s SHIVA STONE CRUSHER is here by granted consent as per following specification Terms and conditions.

Consent Under	AIR
Period of consent	06/05/2023 - 31/03/2028
Industry Type	Stone crushers
Category	ORANGE
Investment(In Lakh)	191.0
Total Land Area(Sq. meter)	6100.0
Total Builtup Area(Sq. meter)	3500.0
Quantity of effluent	
1. Trade	0.0 KL/Day
2. Domestic	3.0 KL/Day
Number of outlets	1.0
Mode of discharge	
1. Domestic	Septic tank
2. Trade	
Domestic Effluent Parameters	
1. NA	
Trade Effluent Parameters	
1. NA	
Number of stacks	1
Height of stack	
1. Attached to jaw vibrator	18 Meter
Emission parameters	
1. SPM	600 mg/m ³
Product Details	

1. Plant Hours <i>Zera/Dual</i>	1200 Metric Tonnes/day
Capacity of boiler	
1. No.	Four
Type of Furnace	
1. No.	
Type of Fuel	
1. NA	
Raw Material Details	
Rock Stone	1200 Metric Tonnes/Day

Regional Officer, Bhiwani
Haryana State Pollution Control Board.

Terms and conditions

1. The applicants shall maintain good house keeping both within factory and in the premises. All hose pipelines valves, storage tanks etc. shall be leak proof. In plant allowable pollutants levels, if specified by State Board should be met strictly.
2. The applicant/company shall comply with and carry out directive/orders issued by the Board in this consent order at all subsequent times without negligence of his /its part. The applicant/company shall be liable for such legal action against him as per provision of the law/act in case of violation of any order/directives. Issued at any time and or non compliance of the terms and conditions of his consent order.
3. The applicant shall make an application for grant of consent at least 90 days before the date of expiry of this consent.
4. Necessary fee as prescribed for obtaining renewal consent shall be paid by the applicant alongwith the consent application.
5. If due to any technological improvement or otherwise this Board is of opinion that all or any of the conditions referred to above required variation (including the change of any control equipment either in whole or in part) this Board shall after giving the applicant an opportunity of being heard vary all or such condition and there upon the applicant shall be bound to comply with the conditions so varied.
6. The industry shall provide adequate arrangement for fighting the accidental leakages, discharge of any pollutants gas/liquids from the vessels, mechanical equipment etc. which are likely to cause environment pollution.
7. The industry shall comply noise pollution (Regulation and control) Rules, 2000.
8. The industry shall comply all the direction/Rules/Instructions as may be issued by the MOEF/CPCB/HSPCB from time to time.
9. The industry shall ensure that various characteristics of the effluents remain within the tolerance limits as specified in EPA Standard and as amended from time to time and at no time the concentration of any characteristics should exceed these limits for discharge.
10. The industry would immediately submit the revised application to the Board in the event of any change in the raw material in process, mode of treatment/discharge of effluent. In case of change of process at any stage during the consent period, the industry shall submit fresh consent application alongwith the consent to operate fee, if found due, which may be on any

account and that shall be paid by the industry and the industry would immediately submit the consent application to the Board in the event of any change during the year in the raw material, quantity, quality of the effluent, mode of discharge, treatment facilities etc.

11. The officer/official of the Board shall reserve the right to access for the inspection of the industry in connection with the various process and the treatment facilities. The consent to operate is subject to review by the Board at any time.

12. Permissible limits for any pollutants mentioned in the consent to operate order should not exceed the concentration permitted in the effluent by the Board.

13. The industry shall pay the balance fee, in case it is found due from the industry at any time later on.

14. If the industry fails to adhere to any of the conditions of this consent to operate order, the consent to operate so granted shall automatically lapse.

15. If the industry is closed temporarily at its own, they shall inform the Board and obtain permission before restart of the unit.

16. The industry shall comply all the Directions/ Rules/Instructions issued from time to time by the Board.

Specific Conditions :

1. That the unit will run and maintain the APCM/ physical control measures to bring the emissions within limits prescribed by the Board.

2. The unit will keep the air emissions within limits prescribed limits by the Board/under provision of EP Act, 1986.

3. The unit will submit the analysis report of Air emission from the Board's Laboratory within regularly and in case sample is found exceeding the norms, the CTO will be revoked as per policy of the Board.

4. The unit will apply for renewal of consent at least 90 days before expiry date of the consent.

5. The unit will abide with the directions/guidelines HSPCB/CPCB/ any court decision/direction of any competent authority.

6. The unit will make stringent compliance of stone crusher notification 11.05.2016.

7. The unit adhere to the production capacity mentioned in CTE/CTO certificate. If unit found violating the production capacity, the CTO so granted shall be revoked automatically. 8. The unit will procure the raw material from legitimate source only.

9. This CTO is without prejudice to any action to be taken against the unit and its responsible persons under the provisions of applicable laws / acts / notification / courts order to be taken in respect of any violations found at any stage without any claim of the unit.

10. The unit will obtain prior NOC/Permission from central Ground Water Authority or from HWRA i.e. Competent Authority of the state, in case underground water resource is used by the unit.

11. This CTO is without prejudice to any action to be taken against the unit and its responsible persons under the provisions of applicable laws / acts / notification / courts order to be taken in respect of any violations found at any stage without any claim of the unit.

12. The unit will abide with the directions/guidelines HSPCB/CPCB/EPCA/ direction of any competent authority or any relevant decision of any Court.

13. If fails to comply the provisions of said notification, the CTO so granted shall be revoked automatically without giving any notice.

14. The unit will plant sufficient Nos. of trees within & outside the premises during coming

monsoon season or with the approval of Forest Department as per notification dated 11.5.2016

15. If the unit is found not complying the conditions of CTO so granted at any stage, the unit will be liable for legal action, closure action as per the provisions of environmental Acts/laws and for levy of Environment Compensation on the basis of polluter pay principal as per the directions of Hon'ble NGT - CAQM/CPCB - HSPCB issued from time to time

16. CTO so granted is subject to compliance of the directions issued by Hon'ble NGT vide its order dated 18.1.2023 in OA No. 607 of 2018, in case of noncompliance, CTO shall be revoked.

Rakesh Kumar
Bhiwani

*Regional Officer, Bhiwani
Haryana State Pollution Control Board.*



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ANNEXURE 4
12हरियाणा सरकार
हरियाणा जल संसाधन प्राधिकरण
Government of Haryana
Haryana Water Resources Authority

PERMISSION CERTIFICATE FOR GROUND WATER EXTRACTION

Project Name:	Shiva Stone Crusher Vill Birhi Kalan Distt Charkhi Dadri		
Project Address:	Vill Birhi Kalan Distt Charkhi Dadri		
Village/MC:	Birhi Kalan	Tehsil:	Dadri
District:	CHARKI DADRI	State:	Haryana
Pin Code:	--		
Communication Address:	Vill Birhi Kalan Distt Charkhi Dadri		
Address Regional Office:	Rear Building, 3rd Floor, HSVP, Sector-6, Panchkula		

1. NOC No.:	HWRA/NOC/IND/N/2023/1117		
2. Application No.:	HWRA/IND/N/2021/1152	3. Category:	Industry
4. Project Status:	New	5. NOC Type:	New

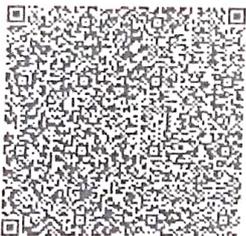
6. Ground Water Extraction Permitted:				
Ground Water For	m3/day	m3/year	Valid From	Valid Upto
Saline Water	20.00	6000.00	31/03/2023	31/03/2024
Total	20.00	6000.00	--	--

7. Details of Ground Water Extraction: Total Existing No.:	1				Total Proposed No.:				0			
	DW	DCB	BW	TW	DW	DCB	BW	TW	DW	DCB	BW	TW
Abstraction Structure*	--	--	1	--	--	--	--	--	--	--	--	--

*DW - Dug Well; DCB - Dug cum Bore Well; BW - Bore Well; TW - Tube Well; DWLR - Digital Water Level Recorder

8. Quantum of ground water recharge(m3/year)	--			
9. Number of Piezometers (Observation wells) to be constructed/ monitored & Monitoring mechanism	No. of Piezometers	Monitoring Mechanism		
	0	Manual	DWLR	Telemetry
		0	0	0

* Terms & conditions are at the back of this page.



Note: This is computer generated certificate, it can be validated by scanning QR code.

**FOREST DEPARTMENT GOVT. OF HARYANA****O/o Divisional Forest Officer Charkhi Dadri**

Rohtak Road, Near P.W.D. Rest House, Ch. Dadri, E-mail:-dfodadri@gmail.com

Letter No. 1455

Dated. 10/9/23

To,

M/s Shiva Stone Crusher.

Village – Birhi Kalan,

Distt. Charkhi Dadri.

Subject : Verified Plantation Plan as per Haryana Government,
Environment Department Notification No. S.O
12/C.A29/1986/Ss. 5 and 7/2016 dated 11th May, 2016.

---00---

Plantation done according to plantation plan as per
Haryana Government, Environment Department Notification No. S.O
12/C.A29/1986/Ss. 5 and 7/2016 dated 11th May, 2016 was verified as
per availability of space & found satisfactory. Regular
Care/Maintenance of plants is required.


Divisional Forest Officer,
Charkhi Dadri.

Plantation Plan As per Haryana Government, Environment Department
 Notification No. S.O 12/C.A29/1986/Ss. 5 and 7/2016 dated 11th May, 2016.

DETAIL OF THE CRUSHER UNIT	STATISTICAL DATA/ INFORMATION FURNISHED
Name of the Crushing Unit	SHIVA STONE CRUSHER
Location Of the Crushing Unit	BIRHI, KALAN CH DADR
Total Area Of the Crushing Unit(somtr)	6070 Sq.Mtr
Total peripheral Length(mtr)	328 mtr
Available peripheral length for plantation(mtr)	129 mtr
Proposed no. of plantation Rows	243
Proposed no. of plants to be planted	305
Layout of the Plantation Plan (Not to Scale/ Approximate)	Attached

It is certified that I/we have taken up the utmost possible avenue plantation as means of pollution control measure at my above mentioned crushing unit and shall continue to do so as per availability of space in future also I/We also assure that the plantation done as per the approved plan shall be taken care of as per the conditions laid down by the Forest Department in letter and spirit

Name & Signature of the Owner/Authorized Person

Date Of submission-

AS
 Shiva Stone Crusher
 Partner

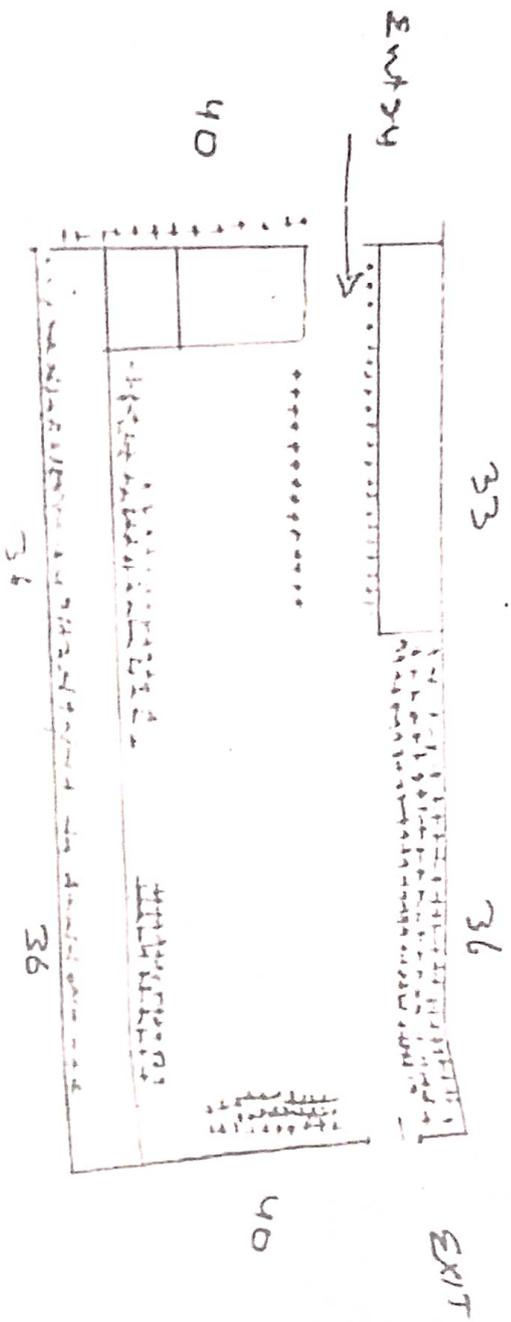
AS
 Shiva Stone Crusher
 Partner

Plantation plan approved, subject to the conditions laid down in the Divisional Forest Officer, Charkhi - Dadr Letter No 1477
 Dated 04/01/2021

Divisional Forest Officer
 CH DADR
 CH Dadr

9466368544

Plantation Plan As per Haryana Government, Environment Department
Notification No. S.O 12/C.A29/1986/Ss. 5 and 7/2016 dated 11th May, 2016.



Name & Signature of the Owner/Authorized Person

Date Of submission-

AS
Shiva Stone Crusher

Partner Shiva Stone Crusher

Partner

Plantation plan approved, subject to the conditions laid down in
the Divisional Forest Officer, Charkhi - Dadli Letter No 1477
Dated 04/01/2021

[Signature]
CH DADLI



GOVERNMENT OF HARYANA
DEPARTMENT OF MINES AND GEOLOGY

No. DMG/Hy/SC/ L-533

Dated :- 14-02-2023

Whereas M/s Shiv Stone Crusher of Village BIRHI KALAN, Tehsil CHARKHI DADRI, District Charkhi Dadri applied for the renewal of stone crusher licence earlier granted for the period from 09-05-2020 to 08-05-2023 as per provisions the Haryana Regulation and Control of Stone Crushers Act, 1991 read with Haryana Regulation and Control of Stone Crushers Rules, 1992, to run the crusher and has submitted required papers along with required fee of Rs.30,000/-.

2. The stone crusher licence is hereby renewed and permission is granted to M/s Shiv Stone Crusher to run stone crusher in village BIRHI KALAN, Tehsil CHARKHI DADRI, District Charkhi Dadri for the three years with effect from 09-05-2023 to 08-05-2026 subject to the condition given below:-

- a) The licensee will follow the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules and notifications framed or issued there under.
- b) The licensee will not pay wages less than the minimum wages prescribed by the Central or State Governments from time to time under the Minimum Wages Act, 1948, to the workers employed in the crushing operations/ crusher.
- c) The licensee will restore the flora, if destroyed, by the crushing operations and will plant trees around the periphery of the crusher and will maintain the same to the satisfaction of the Department of Mines & Geology, Haryana.
- d) The licensee will immediately report to the Deputy Commissioner and Assistant Mining Engineer or Mining Officer of the district concerned about any accident which may take place during the course of crushing operations or otherwise within the premises of the crusher unit, resulting in serious bodily injury to the labour or any other person.
- e) The licensee will issue the transit pass/ bills to the vehicles for transportation of mineral in any form only through e-rawaana portal of the Mines and Geology Department; and
- f) The licensee shall indemnify the State Government against the claims of the third parties.

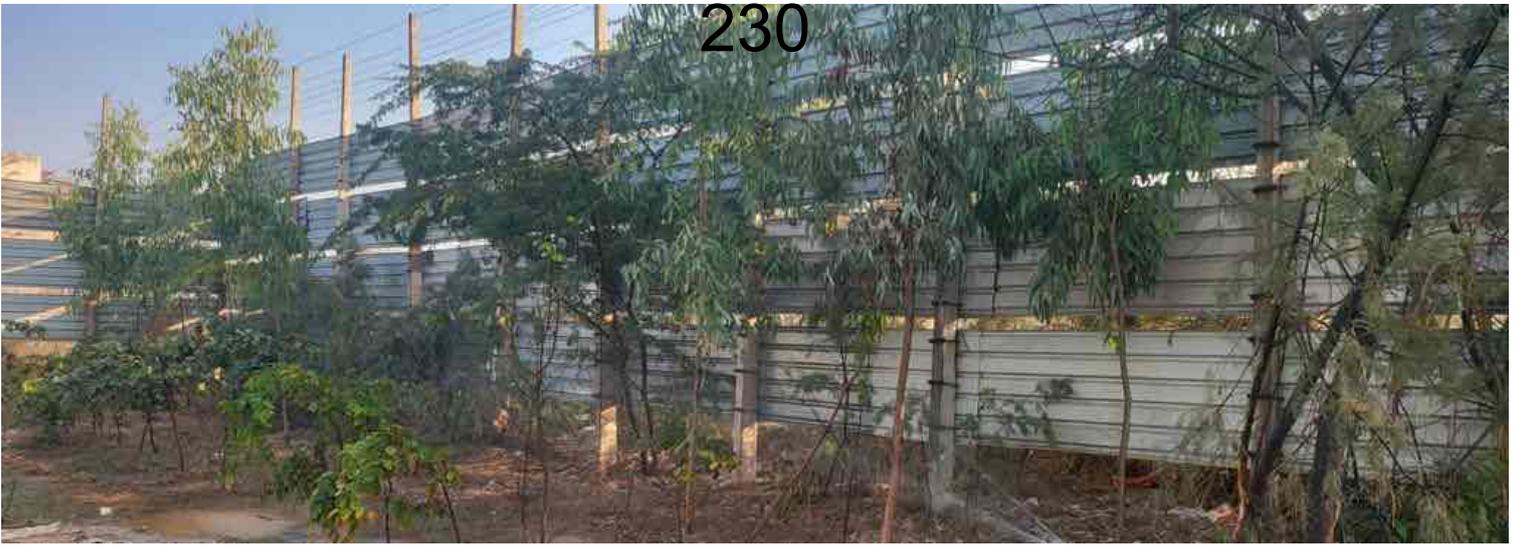
The license expires on 08-05-2026

Mukul Kumar, IAS
Director
Mines and Geology Department
Haryana

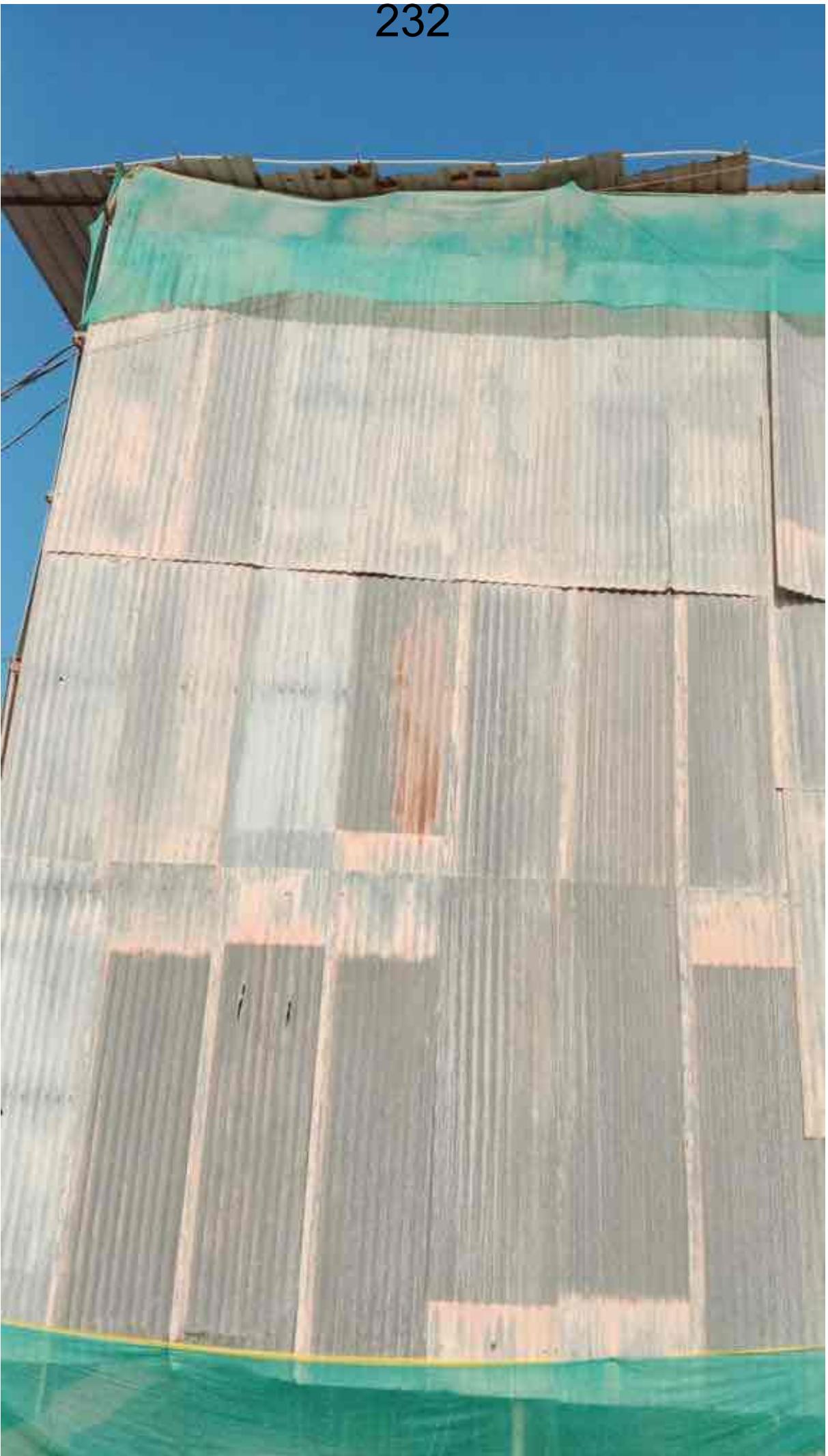
This is system generated and need not any signature.
Room No. 1, 2nd Floor, Plot No. 9, IT Park, Sector - 22, Panchkula - 134116



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I.A. No. Of 2023

IN

ORIGINAL APPLICATION NO. 480 OF 2022

BETWEEN :

KULDEEP

APPPLICANT

V/S

STATE OF HARYNA

RESPONDENTS

AFFIDAVIT

I, Sanjay r/o house no. 882 khorra, Jhajjar, Haryana at present at New Delhi on behalf of M/s Shiva Stone Crusher do hereby solemnly affirm and declare as under :

1. That I am the respondent no. in the aforesaid Original application and I am fully conversant with the facts & circumstances of above mentioned case, hence competent to swear this affidavit .
2. That I have read over the accompanying reply/response and I have understood and the contents therein which are true to my knowledge.

Sanjay
I Identify the deponent who has
Signed/Put T.I. in my presence

संजय
DEPONENT

Verification

I, Sanjay verified that the contents of the above affidavit are true and correct to the best of knowledge and belief, Nothing material has been concealed therefrom.

Verified at NEW DELHI on 13th, December, 2023

संजय
DEPONENT



A.N. Singh
ATTESTED
A.N. Singh, Adv.
Notary Public
Govt. of India, New Delhi
13 DEC 2023