

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 558 of 2025

In the matter of:

Sunil Kumar Nigam & Ors

.....Applicant(s)

Versus

State of Haryana and others

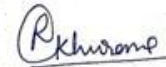
.....Respondent(s)

INDEX

S. No.	Particulars	Page No.
1.	Reply by Way of Affidavit of Jai Narayan, Fire Station Officer, Gurugram on Behalf of Respondent No. 12.	1-3
2.	Annexure R-12/1: Copy of the permission dated 21.06.2018	4
3.	Annexure R-12/2:A Copy of notice no. FSG/2025/3183 dated 25.11.2025 and reminder no. FSG/2025/3638 dated 31.12.2025	5-6
4.	Annexure R-12/3:A Copy of notice no. FSG/2026/167 dated 20.01.2026	7

Date: 09.04.2026

Filed through:



Rahul Khurana, Adv

Counsel for Respondent No. 12

9811894060

rkhuranalegal@gmail.com

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 558 of 2025

In the matter of:

Sunil Kumar Nigam & Ors

.....Applicant(s)

Versus

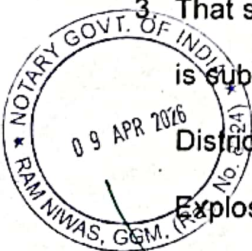
State of Haryana and others

.....Respondent(s)

**REPLY BY WAY OF AFFIDAVIT OF JAI NARAYAN, FIRE
STATION OFFICER, GURUGRAM ON BEHALF OF
RESPONDENT NO. 12.**

I, Jai Narayan, Fire Station Officer, Gurugram do hereby solemnly affirm and declare as under:-

1. That in my aforesaid official capacity, I am competent to swear this affidavit on behalf of respondent no. 12. I have read and understood the contents of the application.
2. That present reply is being filed dealing with the issue of fire safety concerning with the answering respondent. Rest of the allegations are denied which is contrary/inconsistent with the tenor of present reply affidavit. It is humbly submitted that liberty is being craved to file additional reply, as and when required, with the permission of this Hon'ble Tribunal.
3. That so far as the High Speed Diesel Tank and Gas Tank are concerned, it is submitted that the comments regarding the same were sought for by the District Magistrate, Gurugram from the Municipal Corporation, Gurugram, Explosives Department, District Town Planner, and the NOC in this regard was provided by the Municipal Corporation, Gurugram, Explosives Department, District Town Planner, to the District Magistrate, Gurugram



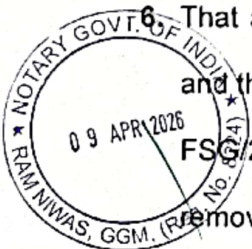
✓

and thereafter, the permission was granted by the District Magistrate, Gurugram. Further, on inspection conducted by the Fire Team, it has been found that High Speed Diesel Tank has been constructed in the society at the same place where the permission / sanction was granted by the District Magistrate, Gurugram vide Endst. No. 3062-67/LP dated 21.06.2018. Copy of the permission dated 21.06.2018 is annexed herewith as **Annexure R-12/1**.

4. That it is further submitted that the inspection was conducted at Windchant society by the officials of Fire Department on 27.09.2025. It was found that some of the area of the fire tender path is hard green, instead of hard surface. Therefore, noticeno. FSG/2025/3183 dated 25.11.2025 with regard to fire tender path was issued to the respondent no. 8 M/s Experion Developers Pvt. Ltd. to remove the defect of fire tender path and to construct the same as a hard surface, as per approved Fire Fighting Scheme. Further, a reminder no. FSG/2025/3638 dated 31.12.2025 was also issued to the respondent no. 8 for removing the above-mentioned defect and for intimating the Fire Department about the same. A Copy of notice no. FSG/2025/3183 dated 25.11.2025 and reminder no. FSG/2025/3638 dated 31.12.2025 has been annexed herewith as **Annexure R-12/2**.

5. That through the above notice and reminder, 30 days' and 15 days' time respectively was provided to the respondent no. 8 for removing the defects and reporting the matter to the Fire Department. However, the respondent no. 8 did not comply with the said notice or give any reply to the same.

6. That another inspection was conducted by the Fire Team on 17.01.2026 and the situation was found to be the same. Therefore, a second notice no. FSG/2026/167 dated 20.01.2026 was issued to the respondent no. 8 for removing the defects. A Copy of notice no. FSG/2026/167 dated



[Handwritten signature]

20.01.2026 issued to Respondent No. 8 is annexed herewith as **Annexure R-12/3**.

7. That in case the respondent no. 8 does not comply with the directions issued in the above-mentioned notice / reminder, then the appropriate action will be taken against the respondent no. 8 as per the provisions of Haryana Fire and Emergency Services Act, 2022.

It is, therefore, respectfully prayed that in view of the submissions made in above paras, the present reply may kindly be taken on record.

Place:- Gurugram
Dated:- 09.04.2026

Sub 09/04/26
Deponent

Verification:-

Verified that the contents of para no. 1 to 7 of the above reply affidavit are true and correct to my knowledge and based on information derived from the official record which I believe to be correct. No part of it is false and nothing material has been kept concealed therein.

Place:- Gurugram
Dated:- 09.04.2026

Sub 09/04/26
Deponent



ATTESTED

Sub
RAM NIWAS MALIK, ADVOCATE
NOTARY, GURUGRAM (HR.) INDIA

OFFICE OF DISTRICT MAGISTRATE, GURUGRAM
(No Objection certificate)

Under rule 144 of Petroleum Rules 2002 the District Authority, Gurugram has No Objection for storage of 20 KL Petroleum Class "B" (In Bulk) to M/s Experion Developers Pvt Ltd. at village Chauma, Sector-112, Gurugram (Haryana) subject to fulfillment of the following condition raised by the Commissioner, Municipal Corporation, Gurugram in his report before starting the storage.

1. Commissioner Municipal Corporation, Gurugram vide his report No. MCG/FS/SFSO/2016/2414, dated 23-09-2016.
 1. Foam Type 45 Ltrs. Trolley (AFFF)- 04 Nos.
 2. Foam Type Fire Extinguisher 9 Ltrs. Capacity- 04 Nos
 3. ABC Type Fire Extinguisher 6 Kg capacity- 08 Nos.
 4. Sand Buckets- 08 Nos.
 5. Emergency Telephone & No Smoking Board
 6. Boundary wall/fencing of 5' Height.
 7. Loading-Unloading work should be done in sun light.
2. Sub Divisional Magistrate, (North), Gurugram vide his report No 1095/Reader, dated 04-10-2016

" This office has no objection in issuing the NOC".

District Town Planner, (E), Gurugram vide his office memo. No. 2789/Reader, dated 25/04/2018.

" This office has no objection in issuance of the necessary No Objection Certificate (NOC) by the competent authority regarding subject cited matter. "

The No Objection Certificate is revocable if any of the conditions and instructions of the Govt. is not fulfilled.

Sd/-
District Magistrate
Gurugram.

Endst No. 3062-67 /LP. dated: 21/06/18

A copy is forwarded to the following for information and necessary action.

1. Chief Controller of Explosive Department of Explosive A- Block, 5th floor, CGO Complex, Seminary Hills, Opposite T.V. Tower, Nagpur,
2. Deputy Chief Controller of Explosive H.H.4, CGO, Complex, Hall No. 502 & 507, Faridabad.
3. Commissioner, Municipal Corporation, Gurugram with reference to his letter no. MCG/FS/SFSO/2016/2414, dated 23-09-2016.
4. Sub Divisional Magistrate, (North), Gurugram with reference to his letter no 1095/Reader, dated 04-10-2016
5. District Town Planner, (E), Gurugram with reference to his memo no 2789/Reader, dated 25/04/2018.
6. M/s Experion Developers Pvt. Ltd. at village Chauma, Sector-112, Gurugram (Haryana).

For District Magistrate
Gurugram.
District Magistrate
Gurugram

प्रेषक

वरिष्ठ दमकल केन्द्र अधिकारी,
दमकल केन्द्र सैक्टर- 29,
जिला गुरुग्राम।

प्रेषित

M/s Experion Developers Pvt. Ltd.
Windchants Group Housing Colony, Sector -112,
Gurugram.

क्रमांक-FSG/2025/ 3183

दिनांक 26-11-2025

विषय:-

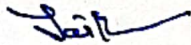
Complaint against Promoter M/s Experion Developers Pvt. Ltd. for gross illegalities and violations of approved Fire Plan in Windchants Group Housing Colony, Sector -112, Gurugram.

उपरोक्त विषय पर कार्यालय में महानिदेशक, हरियाणा अग्निशमन एवं आपातकालीन सेवाएं, पंचकुला के माध्यम से प्राप्त शिकायत के संदर्भ में।

विषयाधीन मामले में शिकायतकर्ता द्वारा दी गई शिकायत के आधार पर आपकी सोसाइटी M/s Experion Developers Pvt. Ltd., Sector-112, Gurugram का दमकल केन्द्र अधिकारी, दमकल केन्द्र भीमनगर, गुरुग्राम की टीम द्वारा मौका निरीक्षण किया गया व जिसमें पाया गया कि:-

1. टॉवर W7 के साथ एच0एस0डी0 टैंक एवं गैस बैंक बनाया हुआ जिसके अप्रूव्ड दस्तावेज व टावर टैंक की दूरी के बारे में कार्यालय को अवगत कराएं।
2. आपके द्वारा विलास/टॉउन हाऊस के पीछे का सैट बैंक एरिये को बंद किया हुआ है।
3. आपके द्वारा कुछ टॉवरों व क्लब के चारों तरफ का फायर टेंडर रोड हार्ड ग्रीन बनाया हुआ है, जो कि अप्रूव्ड फायर फाईटिंग स्कीम अनुसार नहीं बना है।

उपरोक्त के संदर्भ में आपको पुनः लिखा जाता है कि आप 01 माह के अन्दर-अन्दर बिन्दुवार जवाब इस कार्यालय में प्रस्तुत करना सुनिश्चित करें अन्यथा नियमानुसार आगामी कार्यवाही अमल में लाई जायेगी।


वरिष्ठ दमकल केन्द्र अधिकारी,
दमकल केन्द्र सैक्टर- 29,
जिला गुरुग्राम

- CC to: 1- Ashish Jindal, R/o 1402, WT06, Windchants Condominium, Sector -112, Gurugram-122017
2- Director General, Fire & Emergency Services, Haryana, Panchkula.

प्रेषक

स्मरण पत्र-।

वरिष्ठ दमकल केन्द्र अधिकारी,
दमकल केन्द्र सैक्टर- 29,
जिला गुरुग्राम।

प्रेषित

M/s Experion Developers Pvt. Ltd.
Windchants Group Housing Colony, Sector -112,
Gurugram.

कमांक-FSG/2025/ 3638

दिनांक 31/12/2025

विषय:-

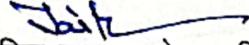
Complaint against Promoter M/s Experion Developers Pvt. Ltd. for gross illegalities and violations of approved Fire Plan in Windchants Group Housing Colony, Sector -112, Gurugram.

उपरोक्त विषय पर कार्यालय में महानिदेशक, हरियाणा अग्निशमन एवं आपातकालीन सेवाएं, पंचकुला के माध्यम से प्राप्त शिकायत व इस कार्यालय के पत्र कमांक-FSG/2025/3183 दिनांक 26.11.2025 के संदर्भ में।

विषयाधीन मामले में शिकायतकर्ता द्वारा दी गई शिकायत के आधार पर आपकी सोसाइटी M/s Experion Developers Pvt. Ltd., Sector-112, Gurugram का दमकल केन्द्र अधिकारी, दमकल केन्द्र भीमनगर, गुरुग्राम की टीम द्वारा मौका निरीक्षण किया गया व जिसमें पाया गया कि:-

1. टॉवर W7 के साथ एच0एस0डी0 टैंक एवं गैस बैंक बनाया हुआ जिसके अप्रूवड दस्तावेज व टावर टैंक की दूरी के बारे में कार्यालय को अवगत कराएं।
2. आपके द्वारा विलास/टॉउन हाऊस के पीछे का सैट बैंक एरिये को बंद किया हुआ है।
3. आपके द्वारा कुछ टॉवरों व क्लब के चारों तरफ का फायर टेंडर रोड़ हार्ड ग्रीन बनाया हुआ है, जो कि अप्रूवड फायर फाईटिंग स्कीम अनुसार नहीं बना है।

उपरोक्त के सन्दर्भ में आपको पुनः लिखा जाता है कि आप 15 दिन के अन्दर-अन्दर बिन्दुवार जवाब इस कार्यालय में प्रस्तुत करना सुनिश्चित करें अन्यथा नियमानुसार आगामी कार्यवाही अमल में लाई जायेगी।


वरिष्ठ दमकल केन्द्र अधिकारी,
दमकल केन्द्र सैक्टर- 29,
जिला गुरुग्राम।

CC to: 1- Ashish Jindal, R/o 1402, WT06, Windchants Condominium, Sector -112,
Gurugram-122017

2- Director General, Fire & Emergency Services, Haryana, Panchkula.

प्रेषक

स्मरण पत्र-11

वरिष्ठ दमकल केन्द्र अधिकारी,
दमकल केन्द्र सैक्टर- 29,
जिला गुरुग्राम।

प्रेषित

M/s Experion Developers Pvt. Ltd.
Windchants Group Housing Colony, Sector -112,
Gurugram.

कमांक-FSG/2026/167

दिनांक 20/01/2026

विषय:-


Complaint against Promoter M/s Experion Developers Pvt. Ltd. for gross illegalities and violations of approved Fire Plan in Windchants Group Housing Colony, Sector -112, Gurugram.

उपरोक्त विषय पर कार्यालय में महानिदेशक, हरियाणा अग्निशमन एवं आपातकालीन सेवाएं, पंचकुला के माध्यम से प्राप्त शिकायत व इस कार्यालय के पत्र कमांक-FSG/2025/3183 दिनांक 26.11.2025 व पत्र कमांक-FSG/2025/3638 दिनांक 31.12.2025 के संदर्भ में।

विषयाधीन मामले में शिकायतकर्ता द्वारा दी गई शिकायत के आधार पर आपकी सोसाइटी M/s Experion Developers Pvt. Ltd., Sector-112, Gurugram का दमकल केन्द्र अधिकारी, दमकल केन्द्र भीमनगर, गुरुग्राम की टीम द्वारा मौका निरीक्षण किया गया व जिसमें पाया गया कि:-

1. टॉवर W7 के साथ एच0एस0डी0 टैंक एवं गैस बैंक बनाया हुआ जिसके अप्रूवड दस्तावेज व टावर टैंक की दूरी के बारे में कार्यालय को अवगत कराएं।
2. आपके द्वारा विलास/टॉउन हाऊस के पीछे का सैट बैंक एरिये को बंद किया हुआ है।
3. आपके द्वारा कुछ टॉवरों व क्लब के चारों तरफ का फायर टेंडर रोड हार्ड ग्रीन बनाया हुआ है, जो कि अप्रूवड फायर फाईटिंग स्कीम अनुसार नहीं बना है।

उपरोक्त के सन्दर्भ में आपको पुनः लिखा जाता है कि आप 07 दिन के अन्दर-अन्दर बिन्दुवार जवाब इस कार्यालय में प्रस्तुत करना सुनिश्चित करें अन्यथा नियमानुसार आगामी कार्यवाही अमल में लाई जायेगी।


वरिष्ठ दमकल केन्द्र अधिकारी,
दमकल केन्द्र सैक्टर- 29,
जिला गुरुग्राम।

CC to: 1- Ashish Jindal, R/o 1402, WT06, Windchants Condominium, Sector -112,
Gurugram-122017

2- Director General, Fire & Emergency Services, Haryana, Panchkula