

BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL  
BENCH, NEW DELHI  
O.A. NO.1140 OF 2024

**IN THE MATTER OF :**

Sumit Kumar ... Applicant  
Versus

State of Haryana & Ors. ....Respondents

I N D E X

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TARUN GUPTA  
ADVOCATE FOR RESPONDENT NO.6  
NEW DELHI B-7/50, SAFDARJUNG ENCLAVE MAIN  
DATED : 21.03.2025 NEW DELHI – 110 029

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.....Respondents

**REPLY ON BEHALF OF RESPONDENT NO.6**

**MOST RESPECTFULLY SHOWETH :**

1. At the outset, your answering respondent states that it is operating strictly in accordance with law and is meeting all the parameters/norms/standards fixed by the government. It is operating on the basis of valid consent to establish and consent to operate granted by the Haryana State Pollution Control Board. Its mining plan stands duly approved by the Department of Mines and Geology, Haryana. It has also been granted Environmental Clearance by the Ministry of Environment, Forest and Climate Change. It is scrupulously complying with all the conditions mentioned in the Environmental Clearance and is carrying on mining in accordance with its approved mining plan. The mining activities of your answering respondent are at a

permissible distance from Hospital, School and houses and hence the said mining activities do not in any manner adversely affect the activities of any Hospital, School or houses. Its PM10, PM2.5, Sox and NOx parameters are well within the prescribed range. It is meticulously complying with all the environmental norms and its activities are not causing any pollution or health hazard.

2. The letter petition filed by the Applicant is totally misconceived, vexatious, frivolous and motivated. The letter petition has been mischievously got filed by certain vested interests with an oblique motive to arm twist and brow beat your answering respondent and coerce it to accede to their illegal demands. Hence the said letter petition being thoroughly misconceived, ill founded, frivolous and motivated, deserves to be dismissed.

3. The allegations levelled in the letter petition regarding any illegal mining being conducted by your answering respondent or heavy blasting being done by it at a distance of 50 mtrs from

residential area or 200 mtrs from a School or Hospital or its mining activities causing any damage to the buildings/construction in the nearby area or causing heavy air pollution creating health hazards to local people are absolutely wrong and hence strenuously denied. It is vehemently denied that your answering respondent is violating the conditions of EC with respect to plantation, depth of mines or CSR activities. It is vehemently denied that any mining activity is being carried out in Aravali Forest Region.

4. That as regards the two stone crushing units, they are also operating on the basis of valid consent to establish and consent to operate granted by the Haryana State Pollution Control Board. Their emissions are also well within the prescribed range and adequate air pollution control measures as prescribed under the law have been installed by them. Their activities are not causing any pollution or health hazard. It is vehemently denied that 3 stone crushers have been installed or that one is running illegally without requisite permissions and

licenses.

5. That the joint committee constituted pursuant to the directions passed by this Hon'ble Tribunal have already verified the actual position at the spot and have found the unit of your answering respondent to be fully compliant with all the environmental norms.

6. That though the unit of your answering respondent is fully compliant, certain minor insufficiencies have been pointed out in the report of the Joint Committee. Same are dealt with hereinunder:

**MINE**

S.No.	Deficiencies pointed out in the report of Joint Committee	Response
1.	7.5m wide green belt as mandated under EC is yet to be completed.	As against the requirement of planting 9300 plants, your answering respondent has already done extensive plantation of more than 10000 saplings. Some areas of the mine boundaries could not be vegetated due to rocky/stony ground and absence of the natural soil. Your

		<p>answering respondent has already undertaken the works of the transplantation of the top soil to these area and plantation activity has started. In addition, some patches of the boundaries where plantation could not survive, fresh plantation is being undertaken and same will be completed within few months. Thus though your answering respondent has already developed requisite green belt as mandated under the EC, necessary steps have already been initiated by it to make good the minor inadequacies pointed by the Joint Committee and needful will be done at the earliest.</p>
2.	<p>Permanent sprinklers on haulage roads have not been provided</p>	<p>Immediately on the pointing of the Joint Committee, your answering respondent has provided permanent sprinklers on haulage roads.</p>
3.	<p>Rain water harvesting system comprising of two pits has not been designed as per CGWB guidelines and have not been maintained properly.</p>	<p>Your answering respondent has already started construction of the rain water harvesting system of two pits, as per the standard design / guidelines of the CGWB and same will be completed shortly.</p>


**STONE CRUSHERS**

S.No.	Deficiencies pointed out in the report of Joint Committee	Response
1.	Height of the wind breaking wall needs to be increased up to the loading point of the jaw crusher	Your answering respondent has already started the work of increasing the height of the wind breaking wall up to the loading point of the jaw crusher and same will be completed shortly.
2.	Dry extraction cum bag filter followed by cyclone not provided	There is no requirement under the notification dated 11.5.2016 issued by the government of Haryana to provide such dry extraction bag filter. The CPCB guidelines specifying the same are yet to be adopted by HSPCB. Be that as it may, your answering respondent has already initiated the process for procurement of such dry extraction cum bag filter and same will be duly provided at the crushers at the earliest.
3.	Interlocking not observed in the water mists spray nozzle system	Your answering respondent has already completed the task of providing interlocking in the water mist spray nozzle system with the main energy supply and water supply meters of the stone crushing unit.

Therefore, since the unit of your answering respondent is fully compliant and conforms to all the environmental norms, the instant OA deserves to be dismissed. Prayed accordingly.

  
RESPONDENT NO.6

THROUGH

  
TARUN GUPTA  
ADVOCATE FOR RESPONDENT NO.6  
B-7/50, SAFDARJUNG ENCLAVE MAIN  
NEW DELHI – 110 029

NEW DELHI  
DATED : 21.03.25

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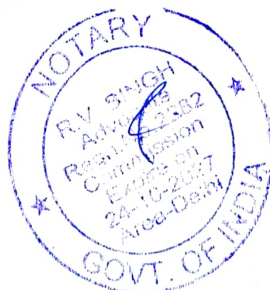
Versus

State of Haryana & Ors. .... Respondents

AFFIDAVIT OF PRAMESH SINGH S/O SH. KAPOOR SINGH  
AGED ABOUT 42 YEARS, R/O H.NO.196, SECTOR -1, HUDA,  
NARNAUAL, HARYANA, PRESENTLY AT NEW DELHI.

I, the above named deponent do hereby solemnly affirm and  
declare on oath as under:-

1. That I am the authorized representative of Respondent  
No.6 in the present matter and am fully conversant with the facts  
of the present case, therefore, I am competent to swear the  
present affidavit.
2. That the accompanying reply has been prepared under  
my instructions. I have read and understood the contents of the  
said reply and same are true and correct to the best of my  
knowledge and belief.



3. I state that all the annexures are true copies to their respective original.

*[Signature]*  
DEPONENT

**VERIFICATION :**

Verified at New Delhi on this the **21 MAR 2025** day of **2025** that the contents of my above affidavit are true and correct as per my belief, no part of it is false and nothing material has been concealed therefrom.

*[Signature]*  
DEPONENT

*[Signature]*  
I identified the deponent/executioner who has signed in my presence



solemnly affirmed before me, read over & explained to the deponent

*[Signature]*  
Notary Public. DELHI

**21 MAR 2025**