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IN THE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 532 OF 2023

U/S 14 and 18 OF THE NATIONAL GREEN TRIBUNAL ACT 2010

IN THE MATTER OF

BALBIR SANDHU

.....APPLICANT

VERSUS

STATE OF HARYANA AND OTHERS

.....RESPONDENTS

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WRITTEN SUBMISSION ON BEHALF OF APPLICANT

By way of Original Application filed under Section 14 and Section 18 of the National Green Tribunal Act – 2010, applicant has requested URGENT INTERVENTION of the Hon'ble Apex Green Tribunal of World's largest Democracy.

It is respectfully submitted that applicant has made the following prayers in the Original Application No. 532 of 2023:

a) To quash the impugned letters dated 27/02/2023, 25/01/2023 and 18/05/2023 whereby the Director, Mines and Geology, Haryana has approved the Mining Plans of a). R M Mines, b), SCP Commodities and c). Reliable Mining Corporation, respectively as the same are in violation of District Survey Plan, Ambala as well as against the provisions of

Environment Protection Rules, 1986 and the notifications issued by the Ministry of Environment, Forests, and Climate Change, Government of INDIA.

b) Direct Chief Secretary, Haryana to appoint NODAL OFFICER (Joint Secretary Rank) for the purpose securing riverine ecology of the Rivers mentioned in the District Survey Plan Ambala.

c) Direct Respondents and in particular Chief Secretary, Haryana to create effective mechanism that extraction of Mineable Minerals shall be done in accordance with District Survey Report, Ambala.

It is respectfully submitted that Respondent Nos. 8, 9, and 10 are M/s R.M. Mines and Infra Private Limited, M/s SCP Commodities, and M/s Reliable Mining Corporation, respectively.

CONTRADICTION AND THE DISCREPANCIES IN THE DISTRICT SURVEY REPORT AND THE MINING PLANS OF RESPONDENT NO. 8, 9, AND 10

It is respectfully submitted:

1. That the Notification dated 15.01.2006, issued by the Ministry of Environment, Forests, and Climate Change, mandates that the District Survey Report (DSR) for the mining of sand and minor

mineral deposits shall be prepared in accordance with the prescribed procedure for sand mining, riverbed mining, and the mining of other minor minerals.

2. That the primary objective of preparing a District Survey Report is to identify areas of aggradation or deposition where mining can be permitted and areas of erosion or proximity to infrastructural structures where mining should be prohibited. It also aims to calculate the annual replenishment rate and allow adequate time for replenishment after mining in a specific area.
3. In compliance with this directive, the State of Haryana prepared the District Survey Report for District Ambala, Haryana. For the convenience of this Hon'ble Tribunal, the petitioner respectfully highlights the following facts and circumstances
 - i. The annual capacity of mineable minerals in District Ambala is 38.29 lakh MT.
 - ii. As per the DSR, approximately 10.11 hectares of land in District Ambala have been identified for the mining of minor minerals.
 - iii. As per the DSR, the following rivers and streams serve as sources of sand and minor minerals in District Ambala: the **Markanda River** enters the district at the Shivalik foothills

near Kala Amb and exits at Dinarpur, spanning a width of 100 to 200 meters and a length of 75 kilometers within Ambala. The **Tangri River**, entering at Fatehgarh and exiting at Dhunni, has a width of 100 to 150 meters and a length of 60 kilometers in the district. The **Begna River** flows from Ujjal Majri to Mullana, with a width of 20 to 40 meters and a length of 40 kilometers. The **Roon River**, with a width of 10 to 20 meters and a length of 12 kilometers, extends from Toka to Rasour. Lastly, the **Sukroon River** flows from Jiriwala to Sahpur, spanning a width of 10 to 20 meters and a length of 3 kilometers. These rivers and streams form critical components of the district's ecological and mineral resource system.

- iv. The Director, Mines and Geology, State of Haryana, approved the Mining Plans along with Progressive Mine Closure Plans for Respondents No. 8, 9, and 10 through impugned letters dated 27/02/2023 for M/s R M Mines and Infra Private Limited (Respondent No. 8), 25/01/2023 for SCP Commodities (Respondent No. 9), and 18/05/2023 for M/s Reliable Mining Corporation (Respondent No. 10), respectively.

- v. That the said approval is not only in direct contravention / violation of District Survey Plan of Ambala but also have the potential to disturb / damage the ecology of the Rivers of said District.
- vi. For the sake of the convenience of this Hon'ble court applicant is providing the details in the tabular form to reflect the contradiction and the discrepancies in the DSR and the Mining Plans of Respondent No. 8, 9, and 10 approved by the Director, Mines and Geology, State of Haryana

Issue	Factual Status as per District Survey Report	Claim by Respondent No. 8 approved by the Director, Mines and Geology	Claim by Respondent No. 9 approved by the Director, Mines and Geology	Claim by Respondent No. 10 approved by the Director, Mines and Geology
Capacity of Mineable Minerals	38.29 Lacs MT	44.60 Lacs MT	15 Lacs MT	12 Lacs MT
Mineable Minerals by River	District Ambala has the following rivers: i. Markanda	Extracting Mineable Minerals from MARKANDA River only	Extracting Mineable Minerals from River BEGNA only	-

	ii. Tangri iii. Begna iv. Roon v. Sukroon As per FORM I: R M Mines will extract from Trilokpur River			
Area Permitted for Mining	10.11 Hectares	99.99 Hectares	39.636 Hectares	42.70 Hectares

It is crystal clear from the above that Director, Mines and Geology, Haryana 2023 has acted beyond the District Survey Report, Ambala while approving the Mining Plans of Respondent No 08, Respondent No. 09 and Respondent No. 10 and has authorized them to extract the Mineable Mineral in excess of the amount mentioned in District Survey Report, District Ambala.

It is respectfully submitted that from the pleadings, following is the **Substantial Questions of Law relating to Environment** which

arose in the present Original Application for adjudication by this Hon'ble court:

WHETHER BY WAY OF ISSUING THE LETTERS DATED 25/01/2023, 27/2/2023 AND 18/05/2023 DIRECTOR, MINES AND GEOLOGY, HARYANA 2023 CAN ACT BEYOND THE DISTRICT SURVEY REPORT, AMBALA.

1. Case of the petitioner is that the impugned letters dated 25/01/2023, 27/02/2023 and 18/05/2023 whereby the Director, Mines and Geology, Haryana has approved the Mining Plans of a). R M Mines, b), SCP Commodities and c). Reliable Mining Corporation, respectively, are not only in violation of District Survey Plan but are also in contravention of the provisions of the Environment Protection Rules, 1986 and the notifications issued by the Ministry of Environment, Forests, and Climate Change and such is liable to be quashed by this Hon'ble Tribunal.
2. The main objective of the preparation of DISTRICT SURVEY REPORT is to ensure that the identification of areas of aggradations or deposition where mining can be allowed; and identification of areas of erosion and proximity to infrastructural

structures and installations where mining should be prohibited and calculation of annual rate of replenishment and allowing time for replenishment after mining in that area. In accordance with the same State of Haryana prepared the DISTRICT SURVEY REPORT for District Ambala, Haryana.

3. As per the District Survey Report, the annual capacity of mineable minerals in District Ambala is 38.29 Lacs MT. However, the Director, Mines and Geology approved mining plans permitting extraction of 44.60 Lacs MT by Respondent No. 8 (M/s R M Mines and Infra Private Limited), 15 Lacs MT by Respondent No. 9 (SCP Commodities), and 12 Lacs MT by Respondent No. 10 (Reliable Mining Corporation). Thus, the Director, Mines and Geology has authorized a total extraction of approximately 71 Lacs MT of mineable minerals, nearly double the annual capacity specified in the District Survey Report.
4. Similarly, the District Survey Report identifies only 10.11 hectares as the area permitted for mining in District Ambala. However, the Director, Mines and Geology has approved mining leases for 99.99 hectares for Respondent No. 8, 39.636 hectares

for Respondent No. 9, and 42.70 hectares for Respondent No. 10. This results in a total mining area of over 182 hectares, far exceeding the permissible area outlined in the District Survey Report.

5. Furthermore, while the District Survey Report identifies five rivers—Markanda, Tangri, Begna, Roon, and Sukroon—as sources of mineable minerals, the Director, Mines and Geology approved Respondent No. 8 to extract minerals from the Trilokpur River.
6. Furthermore, As per the Enforcement and Monitoring Guidelines – 2020 issued by the Ministry of Environment, Forests, and Climate Change, Government of India, the bulk density of mineable minerals must be assessed by an NABL-recognized laboratory. However, neither Respondent No. 8 (R M Mines) nor Respondent No. 9 (M/s SCP Commodities) provided any document demonstrating compliance with this requirement, i.e., bulk density assessed by an NABL-recognized agency. It is pertinent to note that the project proponents only shared documents from an NABL-recognized laboratory after the issue was raised by the applicant, indicating non-compliance with the prescribed guidelines at the initial stage.

7. It is evident from the above that the District Survey Report (DSR), which forms the cornerstone for sustainable and regulated mining practices, was blatantly overlooked. By approving the mining plans for Respondents No. 8, 9, and 10, the Director, Mines and Geology, has acted in clear violation of the DSR. The approvals disregarded the annual capacity of mineable minerals, the permissible area for mining, and other critical parameters outlined in the DSR, thereby compromising the ecological integrity and regulatory framework established to safeguard the district's natural resources.

8. This Hon'ble Tribunal in its Judgment dated 08.12.2017 in the matter of **Anjani Kumar vs State of Uttar Pradesh & Ors**, 2017 SCC OnLine NGT 979, inter-alia mentioned the following regarding sand mining in the Uttar Pradesh:

“It states that the main object of preparation of District Survey Report is to ensure identification of areas of aggradation/deposition where mining can be allowed and identification of areas of erosion and proximity to infrastructural structures and installation where mining should be prohibited and calculation of annual rate of replenishment and allowing time for

replenishment after mining area. Thus, the environmental protection requires a strictly regulated mining in terms of area, quantity as well as most importantly replenishment thereof.” **“The data collection and declared for preparation of DSR shall take precedence over other data and would form the foundation for providing mining lease in terms of Appendix-x to the Notification dated 15th January 2016 must be prepared by the statutory authority stated therein i.e. DEIAA prior to awarding of permits for carrying on mining activity in any part of the State of UP.”**

ILLEGAL AND PROCEDURALLY FLAWED GRANT OF MINING APPROVALS IN VIOLATION OF 2020 GUIDELINES

1. It is respectfully submitted that Clause 4.1.1(a) of the Enforcement & Monitoring Guidelines for Sand Mining, 2020 (the "2020 Guidelines") explicitly mandates that the District Survey Report (DSR) must be prepared prior to the auction, e-auction, or grant of mining leases and Letters of Intent (Lols). The relevant clause reads as follows:

“District Survey Report for sand mining shall be prepared before the auction/e-auction/grant of the

mining lease/Letter of Intent (Lol) by Mining department or department dealing the mining activity in respective states.”

2. In the present case, the Letters of Intent (Lols), auction notices, and mining plans were approved based on an erroneous and incomplete DSR. This original DSR was subsequently rectified by the State Government only after the filing of the present petition, which unequivocally demonstrates that the originally issued Lols, auction notices, and mining plans were granted in violation of the 2020 Guidelines.
3. That the 2020 Guidelines aim to ensure that the DSR accurately identifies the areas suitable for mining and those where mining should be prohibited, as well as the annual replenishment rates. By approving mining-related activities based on an incomplete and erroneous DSR, the State disregarded the procedural safeguards established to prevent environmental degradation and unsustainable mining.
4. Case of the applicant is that the retroactive rectification of the DSR does not cure this procedural defect. The approvals for the Lols,

auction notices, and mining plans were granted in clear violation of the 2020 Guidelines and cannot be retrospectively validated.

5. That the violation of Clause 4.1.1(a) reflects an illegal and procedurally flawed process that undermines the very purpose of the Sand Mining Guidelines, which are designed to ensure environmentally sound and scientifically managed mining activities. As such, the entire process must be revisited and the approvals granted on the basis of the flawed DSR must be quashed.
6. It is respectfully submitted that, it has been held by Apex Court in Sant Lal Gupta v. Modern Coop. Group Housing Society Ltd., (2010) 13 SCC 336 :(2010)-

"21. It is a settled proposition of law that what cannot be done directly, is not permissible to be done obliquely, meaning thereby, whatever is prohibited by law to be done, cannot legally be effected by an indirect and circuitous contrivance on the principle of "quandoaliquid prohibetur, prohibetur et omne per quod devenitur ad illud". An authority cannot be permitted to evade a law by "shift or contrivance". (See Jagir Singh v. Ranbir Singh (1979) 1 SCC 560: 1979 SCC (Cri) 348: AIR 1979

SC 381] and M.C. Mehta v. Kamal Nath [(2000) 6 SCC 213].)”

7. It is respectfully submitted that in the matter of Dinesh Kumar vs. Mining Officer, Seoni & Ors. in O.A. No. 41/2022 (CZ) decided on 13.09.2022 wherein the Tribunal after taking note of the Sand Mining Guidelines, 2020 had held as under:-

*“20. State of Madhya Pradesh in its rules named Madhya Pradesh Sand (Mining, Transportation, Storage and Trading) Rules, 2019 has provided the procedure for procurement of mining leases in State with the statutory permissions in accordance with the environmental rules as contained in Chapter-6 Section 12 which has been quoted above. In addition to above, the MoEF & CC, in supplement and addition to the Sustainable Sand Mining Management Guidelines, 2016 issued the Sustainable Sand Mining Management Guidelines, 2020 giving importance to the DSR and monitoring mechanism. **The guidelines issued in 2020 in point no.4.1.1 (A) requires that DSR for sand mining shall be prepared before the auction/e-auction/ grant of the mining lease/ Letter of Intent (LOI) by Mining Department or***

department dealing in the mining activity in the respective state. The DSR is to be prepared in such a way that it not only identified the 7 mineral bearing area but also define the mining and no mining zones considering various environmental and social factors. The State Government shall issue Letter of Intent as per procedure laid down in there Mine and Mineral Concession Rules with due consideration of final DSR and that all districts have been required to prepare a comprehensive mining plan as per the provisions of District Survey Report and these report shall be put on the website of district administration. No mining shall be allowed in the area which had not been identified in the comprehensive mining plan of the district.”

8. It is respectfully submitted that in the matter of Gaurav Kumar vs. State of U.P & Ors. in O.A. No. 188/2023 (Principal Bench) decided on 20.08.2024 wherein the Hon'ble Tribunal after taking note of the Sand Mining Guidelines, 2020 had held as under:-

19. Hence, we find that in view of Sand Mining Guidelines of 2020 and the judgment of the Hon'ble Supreme Court in the case of Pawan Kumar (Supra) the auction of the

sand mines cannot be done in the absence of the valid DSR, therefore, an auction notice issued without there being a valid DSR is bad in law and cannot be sustained.

9. It is further respectfully submitted that the replenishment study, which is a critical component of the District Survey Report (DSR), has been completely overlooked in both the original and the revised DSR for District Ambala. This omission undermines the scientific basis required for responsible mining and raises serious concerns about the sustainability and legality of the approvals granted.

10. That even the revised District Survey Report (DSR) fails to comply with Clause 5 of the 2020 Sand Mining Guidelines, which mandates a replenishment study to determine the rate of sand deposition, particularly during the monsoon season. This study is crucial to ensure that the rate of sand extraction does not exceed the rate of deposition, thereby protecting the riverine ecosystem. The Joint Committee's report and the respondents' reply do not indicate that a replenishment study has been conducted, which is a direct violation of the 2020 Guidelines. Mining operations carried out without assessing the replenishment rate could result

in irreversible damage to the ecosystem, including the potential alteration of the river's natural course, and pose a significant risk of flooding in downstream villages and towns.

11. It is further respectfully submitted that Clause 5.2 of the Enforcement and Monitoring Guidelines – 2020 mandates that replenishment study samples must be analyzed by a National Accreditation Board for Testing and Calibration Laboratories (NABL)-recognized laboratory. Despite this being a revised DSR, the State of Haryana has still failed to conduct the required replenishment study, which forms the foundation of any scientifically sound riverbed mining operation. The failure to conduct a replenishment study is not only bad in law but also poses a serious risk of causing irreparable harm to the sensitive riverine ecosystem.

12. It is also respectfully submitted that all the respondents have repeatedly admitted 'typographical errors', 'inadvertent mistakes' and the 'misnomer' regarding the Sukroon river in the original DSR clearly suggesting that the flawed foundation upon which the mining plan was approved. These oversights suggest their negligence and have direct and material impact on the legal foundation of the approvals granted for mining and are thus in

clear violation of MoEF Notification dated 15.01.2016, MoEF Notification dated 25.07.2018, Sustainable Sand Mining Management Guidelines, 2016 and the Enforcement and Monitoring Guidelines for Sand Mining, 2020.

13. For the sake of the convenience of this Hon'ble Court, the applicant is providing the details in the tabular form below, which summarizes the admissions made by the respective respondents regarding various errors and inadvertent mistakes in the District Survey Report, mining plans, and related documents. This presentation aims to highlight the inconsistencies and discrepancies acknowledged by the respondents that are central to the matter at hand.

Response Date	Respondent No.	Page No. Paragraph No.	Response Details
07.03.2024	Respondent No. 8	Page 968 Para 15	Respondent No. 8 admitted that the total quantity of mineable minerals was a result of an inadvertent mistake. They also acknowledged the issue regarding the river name, as Trilokpur Nadi giving the justification that it is locally known as Sukroon River.

15.03.2024	Respondent No. 9	Page 1318 Para 10	Respondent No. 9 admitted that the concerned authority inadvertently omitted Gravel (a major constituent in river beds) during the compilation and preparation of the District Survey Report (DSR), including only Boulder, Bajri, and Sand for mining.
15.03.2024	Respondent No. 9	Page 1318 , Para 11	Respondent No. 9 further admitted that the DSR mistakenly omitted the mineable portion of River Sukroon (also known as Trilokpur River), leading to a decrease in the quantity of mining minerals and the mineable portion.
15.03.2024	Respondent No. 9	Page 1319, Para 12	Respondent No. 9 acknowledged that the mining plans approved after theirs were beyond the limits specified in the DSR.
28.09.2024	Respondent No. 10	Page 694, Para 13	Respondent No. 10 admitted that the total quantity of mineable minerals in the DSR resulted from an inadvertent mistake.
28.09.2024	Respondent No. 10	Page 698 Para IX	Respondent No. 10 admitted that the total quantity of mineable minerals in the DSR resulted from an inadvertent mistake.
16.03.2024	Respondent no. 3,4, 5 and 7	Page 1332 Para 5	Respondent 3, 4, 5 and 7 admitted that the Joint committee examined the entire matter and noted that there were small

			discrepancies which occurred inadvertently
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14. For the sake of the convenience of this Hon'ble Court, the applicant is also providing the details in the tabular form below, summarizing the admissions made by the Mining Officer, Ambala, as per the Status Report dated 27.10.2023, filed by the Joint Committee constituted by this Hon'ble Tribunal.

Date	Report/Source	Page No. and Para	Response Details
27.10.2023	Status Report by Joint Committee	Page 487, Para i	Mining Officer, Ambala admitted that the DSR mentioned only Boulder, Bajri, and Sand, but omitted Gravel, a major constituent in river beds, which was mistakenly left out during the DSR compilation.
		Page 487, Para ii	Mining Officer, Ambala admitted that the Mineable portion of River Sukroon was inadvertently

			omitted from the DSR.
		Page 487, Para iii	Mining Officer, Ambala admitted that the total quantity of Mineable Minerals should have been calculated based on the total mining area (more than 1100 Acres ≈ 445.1542 Hectares) mentioned in the DSR.

**SERIOUS IRREGULARITIES IN THE SUBMISSION OF
BACKDATED AFFIDAVITS BY RESPONDENTS NO. 9 AND 10**

1. The Applicant also respectfully wish to bring to the attention of this Honourable Tribunal to the serious legal irregularities committed by Respondent No. 9 in connection with the filing of their written statement which is liable to be rejected.

Upon review of the Written Submission submitted by Respondent No. 9, it is apparent that there has been a deliberate and deceptive manipulation of dates, which not only constitutes a violation of legal

procedure but also amounts to an attempt to mislead this Honourable Court.

Specifically, the index of the written statement clearly indicates that it was prepared on 15.03.2024, and this date is consistently mentioned in the document, including in the end of the written statement, thus establishing that the finalization and signing of the written statement occurred on that date. Furthermore, the written statement contains the signature of Respondent No. 9, affirming that the document was executed on 15.03.2024.

However, to the Applicant's utter shock, the affidavit accompanying the written statement is verified on the back date i.e. 12.01.2024, raising doubts regarding the authenticity and credibility of the document.

From the facts presented, it is crystal clear that Respondent No. 9 has relied upon a backdated affidavit, which is not only impermissible under the law but also constitutes a gross violation of legal procedure, amounting to fraud upon this Honourable Court.

In light of these grave irregularities, the Applicant humbly prays that this Hon'ble Court to take cognizance of the written statement submitted by Respondent No. 9 as the same is bad in law.

The Applicant further requests that the Honourable Court direct the State of Haryana to initiate appropriate penal action against Respondent No. 9 for attempting to deceive the court and engaging in conduct that undermines the sanctity of the judicial process.

2. The Applicant further respectfully wish to bring to the attention of this Hon'ble Court the serious legal irregularities committed by Respondent No. 10 in connection with the filing of their written statement which is liable to be rejected.

Upon review of the Written Submission submitted by Respondent No. 10, it is apparent that there has been a deliberate and deceptive manipulation of dates, which not only constitutes a violation of legal procedure but also amounts to an attempt to mislead this Honourable Court.

Specifically, the index of the written statement clearly indicates that it was prepared on 14.03.2024, and this date is consistently mentioned in the document, including after the prayer clause, thus establishing that the finalization and signing of the written statement occurred on that date. Furthermore, the written statement contains the signature of Respondent No. 10, affirming that the document was executed on 14.03.2024.

However, to the Applicant's utter shock, the affidavit accompanying the written statement is attested on 12.03.2024, which predates the preparation and finalization of the written statement by two days. This discrepancy is further compounded by the fact that the verification clause of the affidavit, dated 12.03.2024, does not mention any date of verification, raising further doubts regarding the authenticity and credibility of the document.

From the facts presented, it is crystal clear that Respondent No. 10 has relied upon a backdated affidavit, which is not only impermissible under the law but also constitutes a gross violation of legal procedure, amounting to fraud upon this Honourable Court.

In light of these grave irregularities, the Applicant humbly prays that this Honourable Court to not to take cognizance of the written statement submitted by Respondent No. 10 as the same is bad in law.

The Applicant further requests that the Honourable Court direct the State of Haryana to initiate appropriate penal action against Respondent No. 10 for attempting to deceive the court and engaging in conduct that undermines the sanctity of the judicial process.

In conclusion, it is respectfully submitted that after the filing of the petition, the District Survey Report (DSR) for District Ambala was subsequently corrected and amended to address the discrepancies identified and raised by the applicant in the Original Application. However, it is important to note that the Letter of Intent (LoI), auction notice, and mining plan were issued and approved based on the old, erroneous DSR. This outdated DSR, which contained critical errors regarding the mineral potential and mineable areas, formed the basis for the entire mining approval process, including the issuance of the LoI, the auction notice, and the approval of the mining plan.

Therefore, the mining operations authorized on the basis of the old DSR cannot be deemed valid, as they do not comply with the revised and rectified DSR, undermining the legal and environmental safeguards set forth in the relevant guidelines.

Furthermore, it is respectfully submitted that Respondent No. 9 and Respondent No. 10 have committed the serious legal irregularities in connection with the filing of their respective written statements. Upon review, it is apparent that both Respondent No. 9 and Respondent No. 10 have relied upon backdated affidavits in their submissions, which is impermissible under the law.

Respondent No. 9 filed a written statement dated 15.03.2024, while the accompanying affidavit was backdated to 12.01.2024.

Similarly, Respondent No. 10's written statement was prepared on 14.03.2024, yet the affidavit was attested on 12.03.2024. These discrepancies raise serious concerns about the authenticity and credibility of their filings. The Applicant humbly prays that this Hon'ble Court takes cognizance of these irregularities, as they constitute a violation of legal procedure and an attempt to mislead this Honourable Court.

It is also clear from the above facts that the Director, Mines and Geology, Government of Haryana has approved the Mining Plans of Respondent no. 8, 9 and 10 in violation of District Survey Plan (DSR) and has not only acted beyond his powers but has also violated the law of the land. Hence, the impugned letters dated 25/01/2023, 27/02/2023 and 18/05/2023 whereby the Director, Mines and Geology, Haryana has approved the Mining Plans of a). R M Mines (Respondent No. 8), b), SCP Commodities (Respondent No. 9) and c). Reliable Mining Corporation (Respondent No. 10), respectively, are not only in violation of District Survey Plan but are also in contravention of the provisions of the Environment Protection Rules, 1986 and the notifications issued by the Ministry of

Environment, Forests, and Climate Change and such is liable to be quashed by this Hon'ble Tribunal.

In view of the above mentioned facts and circumstances, applicant requests this Hon'ble Court to allow the relief as prayed in the present Original Application.

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Service of Written

Submissions in OA No. 532
of 2023

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Date 28 Nov 2024, 21:28

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Sir,

Please find attached the Written Submissions on behalf of applicant.

Please find attached the Written Submissions on behalf of applicant.

Kindly treat the same as advance service.

Regards

Gaurav Kumar Bansal
Advocate
For
Applicant

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