



WEUPPL/MZP/VB/2014/2

To,
Vindhya Bachao Manch
Vindhya Ecology and Natural History Foundation
36/30, Shivpuri Colony,
Station Road,
Mirzapur – 231001

Date: 6th February 2014

Subject: Clarification to the points raised by Vindhya Bachao in regard to our proposed 1320 MW Coal based Thermal Power project located at Dadri Khurd Village, District – Mirzapur

Ref: Minutes of 4th Meeting of the Re-constituted EAC on EIA of Thermal Power held on 18-19th November 2013

Dear Sir,

With reference to the above cited subject, we would like to submit point wise clarification to the points raised in Site Inspection Report by Vindhya Bachao (Vindhya Ecology and Natural History Foundation) as under:

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1.	The project involves forest land	
	I. There is no way one can evade forest land before reaching the project site Transfer of coal by railway lining or even construction of road cannot happen without clearing of forest.	The approach road connecting project site from SH-5 is passing through forest land. The work for road widening will be initiated only after grant of all statutory clearances from State Forest department and Forest Advisory Committee. The coal transport route will be finalized based on alternative route analysis. The route which has minimum forest land will be selected.
	II. The bamboo plantations shown in the EIA report also belong to Forest Department. This makes the entire region except the project sites a forest area including the portion of SH-5 which has forest land on both of its side.	We agree about the fact that forest department has developed Bamboo plantation as a part of social forestry in and around the Mirzapur belt. However, we are confirming that we have neither encroached/cut any Bamboo plantation nor plan to do so in future due to our proposed project activity without statutory permissions.
	III. The proposed pipeline for pumping water from the river Ganga falls well within the forest land even though it is claimed to be motorway.	Water is proposed to be transported through underground pipeline network which won't affect forest area. The maintenance shaft and air vent will be on ground Therefore it will have negligible impact on forest. However We will obtain all necessary statutory clearances before initiation of project. The pipeline route has been selected considering minimum forest area.
	IV. The small spur claimed to be road by the project proponent was found to be part of	The road passing through the forest is not only connecting project site but also connecting many

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	<p>forest land with a banner clearly showing its legal condition. The said spur through the forest land meets the gate of project site which happens to be also the immediate boundary of the Forest Department. The width of the road is just 6-8 feet wide and purely a road being formed by regular passage of villagers. It is a forest road owned by Forest Department, and cannot be treated as common road. A board being put up by the Forest Department proves the fact very well.</p>	<p>villages and used by villagers to access the SH-5. The road will be used after proper permission from Forest Department.</p>
	<p>V. The project is not barren as claimed in the EIA report. There happens to be similar forest as found in the reserve forest area with good vegetation cover. It can be referred as mix forest with mixture of trees, shrubs and grasses.</p>	<p>The proposed project land area is 875 acres out of which 97.58 % is barren land, 1.78% is single crop agriculture land, 0.62 % is human settlement & 0.02 % is water body as per revenue records received from the District Administration.</p> <p>The project is proposed to be located in revenue land. In case of the forest land, diversion will be done as per the provision of Forest Conservation Act, 1980</p>
2	<p>The project site is surrounded by critical wildlife habitat and old forests:</p>	<p>The EIA study covers primary & secondary survey of flora and fauna of project site as well as study area. However, a detailed Biodiversity study is carried out by M/s Green future Foundation, a reputed organization, in which more than 73 plant species are recorded in study area which are common plant species for the region. Out of these, 2 threatened floral species were recorded in the study area namely <i>Terminanila arjuna</i> & <i>Boswellia seret</i>. During the study, 6 Schedule I fauna species were recorded in study area namely common monitor lizard, Indian Peafowl, Egyptian vulture, Four-horned Antelope, Common leopard & sloth bear. A proper Wildlife Conservation & Management Plan along with budgetary allocation of Rs. 184.15 lakh has been made & submitted to CCF (Wildlife) through DFO for their approval. Moreover, we shall also agree to any conditions stipulated by CWLW.</p>
3	<p>Huge Impact on water resource and irreparable damage anticipated.</p> <p>Though the rainfall of Mirzapur District is good, but the proposed plant site lies on hilly region with very less catchment arrangement of water. In fact this is one of the reasons; the local villagers could not grow crops and suffer from poverty. Projects like Bansagar canal are being considered since long time to solve the water problem. This true fact is well documented in the film 'Vindhyan Scourage' made by us in 2011. Scientists working at Krishi Vigyan Kendra situated in the region also accepts this fact that due to undulating landscape, catchment of water</p>	<p>Water use agreement was signed between Irrigation dept. Govt. of UP and Welspun Energy which states that ' WEUPPL has proposed to use of Upper Khajuri Dam for storing water for meeting the project's requirement and as well as to provide storage of 9.5Million Cubic Meter (MCM) per year of water for meeting the irrigation requirement of GoUP during the lean season when no pumping is allowed from the River Ganga and GoUP has accepted the proposed scheme for mutual benefit and agreed that Water abstraction scheme shall be developed by WEUPPL considering pumping of additional quantum of water for Irrigation Department.'</p>



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	is a big issue and agriculture is done only rain based. Upper khajuri dam and lower khajuri dam are two such dams which cater to the minimum needs of the local habitants for agriculture and drinking water.	Thus the water requirement for both Proposed WEUPPL project and irrigation for the lean period can be fulfilled by pumping of water from River Ganga and storing it in Upper Khajuri Dam and the local villagers will be benefited by the proposed scheme.
4	<p>Storing water from river Ganga in Upper Khajuri will bring more crisis!</p> <p>The water stored in upper khajuri dam is mainly rainwater free from contamination and very clean as it is the rainwater which gets stored and suspended matters water gets enough time to settle and self cleansing takes place effectively. Given the vast area and year round slow utilization of water, local people use it for drinking without any extra effort to treat the water. The availability of so much clean water is also a reason that Patehra forest has the highest wildlife diversity in entire district.</p> <p>a. Once, the water from river Ganga is pumped and started utilized, the entire system of water collection and utilization will be changed drastically. The water which was allowed to present for year around will be rapidly filled and used on daily basis. The water from Ganga will be contaminated with industrial effluents and sewage upstream which will lead the entire upper khajuri dam dirty, the Khajuri River and lower khajuri dam and make it unfit for any other use except the power plant. The amount of water is also huge to the extent of impossible to be treated on per hour basis. An impact of this, the region including the university campus will face a huge crisis of drinking water & irrigation. Hence we strongly suggest not to go even with the plan to fill up the dam with water of river Ganga.</p> <p>b. Another implication of sucking so much water will lead to severe impact on ecological flow of river downstream. There is expected to be very good population of gangetic dolphins as witnessed by local fishermen and boat owners, though we lack any official data to confirm it. The river gets further polluted in Varanasi as well, which is just 60km from Mirzapur. To ensure cleansing mechanism of the river and preserving the remaining wildlife, it is very dangerous to reduce the water flow of Ganga.</p> <p>The envisaged quantity of water required i.e. 4 lakh litres per hour will make to 3,50,40,00,000 litres of water per year being pumped to store to some other location that also for industrial</p>	<p>The water requirement for power plant is 4002m³/hr. The water from River Ganga will be withdrawn during monsoon.</p> <p>The Vindhya Bachao observation stated that river ecology have gangetic dolphins and fishing population which itself indicates the intake point is free from any industrial and domestic effluent.</p> <p>No major change in water quality is envisaged in khajuri river and lower khajuri dam thus have insignificant impact on wildlife and human habitation except for minimal change in suspended solids. It also mentioned that river gets polluted in Varanasi which is 60 km downstream. Thus in the intake point major issue which is expected is suspended solids in water during rainy season.</p> <p>The scheme envisaged for withdrawn of water from river Ganges consists of Desilting Chamber at intake point . This chamber will help the suspended solids to settle down at intake point and the De-silted water will be pumped to the Upper Khajuri Dam. In Upper Khajuri Dam again the suspended solids gets retention time. From Upper Khajuri this water will flow 7.5km downstream to reach lower khajuri. Therefore this series of settlement of suspended solids will have very negligible change in lower khajuri dam.</p> <p>The State Irrigation Department suggested the water drawal from Ganga which CWC has approved after detailed analysis of downstream user of river water.</p> <p>The water drawl from Ganges 4 lakh lit./hr. is 0.0003% of the total 60,000 Cu.mec. water flow in the Ganges during the year. Two Stage pumping is envisaged from River Ganga to Upper Khajuri/ Power Project to take</p>

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	purpose in an area where agriculture should be priority. To be noted here importantly is that the elevation of the proposed project site is at 630 feet while the elevation of the upper khajuri dam is at 510 feet. The elevation of river Ganga is around 260 feet.	care of elevation difference. Pump Head will be selected accordingly. We have done preliminary study on the pumping & Piping system keeping in view of elevation difference. Auxiliary power consumption is approx 4.2 MW which is very less (0.318 % of Installed capacity). 9.5 MCM water will be also pumped to Upper Khajuri Dam for the agriculture requirement.																
	Water from Ganga to the project site will need to pump the water for more than 400 feet over a distance of 31km . This will involve a lot of energy to be wasted for meeting the water requirement. What is the need of the project when there is no much deficiencies in the project plan itself. Forest clearance is also envisaged in case of pipelines to be laid as they have to pass though forest land, though we don't think it will be justified to lay pipeline from the river.	The water supply for the proposed project will be through underground pipeline. only ROW will be taken for the same and requisite clearance as per the provision of Forest Clearance Act will be taken.																
5	<p>Wrong siting as per Environmental Guidelines of Thermal power Stations by MoEF. place of tourism, cultural and religious importance is within 7.5 km from project site</p> <p>I. Vindhham Falls, a very old & historical tourism place is refered as a pride of Mirzapur. It is approx 7 km from the project site. Interestingly the same water flows to Vindhham Falls which the project proponent plans to exploit for themselves.</p> <p>II. The newly built south campus of Benaras Hindu University popularly known as Rajiv Gandhi South Campus spreaded over a massive area of 2700 acres is just adjacent to Vindhham Falls. It is well within 7.5 km radius of the project site. The entire campus depends on the Lower Khajuri Dam for its water requirement, which again depends on Upper khajuri Dam.</p>	<p>I. The desired water is sourced primarily from Ganga River flowing at a distance of 17 km from project site for which desired approvals have already been obtained from State & Central Government. The same is only intermediately stored at Upper Khajuri Dam, which is finally pumped to reservoir at project site. Therefore, our source of water is not common as Vindhham Falls.</p> <p>II. Referring Point No. I, we confirm that Upper Khajuri Dam will be used as intermediate storage of water from Ganga & ultimately will be pumped to our project site after fulfilling the commitment with State Government for irrigation & other purposes of local community.</p> <table border="1"> <tr> <td>A</td> <td>Present total live storage capacity of Khajuri Dam, excluding silt level</td> <td>:</td> <td>42.28MCM</td> </tr> <tr> <td>i</td> <td>The water requirement for lean period cultivation as per irrigation department</td> <td>:</td> <td>9.5MCM</td> </tr> <tr> <td>ii</td> <td>Water requirement for the power plant during lean period</td> <td>:</td> <td>18MCM</td> </tr> <tr> <td></td> <td>Total water requirement for lean period (i+ii)</td> <td>:</td> <td>27.5 MCM</td> </tr> </table> <p>Total water requirement for power project including irrigation requirement can be meet by pumping water from river Ganges and storing In Upper Khajuri Dam</p>	A	Present total live storage capacity of Khajuri Dam, excluding silt level	:	42.28MCM	i	The water requirement for lean period cultivation as per irrigation department	:	9.5MCM	ii	Water requirement for the power plant during lean period	:	18MCM		Total water requirement for lean period (i+ii)	:	27.5 MCM
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	<p>III. Ludki Baba temple, a very ancient temple is present at a distance of 7.5 km. This temple is very old and important from religious point of view as people from very far off places visit this ancient temple.</p>		<p>and there is no conflict of interest as for as BHU and Vindhya fall is concerned.</p> <p>III. There is no record of Ludki Baba temple in Archeological Department, Government of India as an ancient Archeological Monument (Please refer List of Monuments under District Mirzapur - S.No. 71 to 89).</p>
6	<p>Wrong Site selection: Apart from absence of and access of basic raw materials like coal and water both of which have to be transported, the entire siting criteria discussed in the EIA report is a question. As per Site Selection Criteria described in Chapter 2 of EIA report, the project proponent has given a point-wise justification for selecting this particular site. Point wise contradiction is given in the following table:</p>		<p>EAC has approved our project site through ToR vide letter no. J-13012/112/2011 – 1A. II (T) dated 15th June 2011, on the basis of our firm proposal on land, water and coal transportation.</p>
	I.	<p>Availability of adequate uncultivable and unused land for erecting power plant structures</p> <p>The land acquisition has been done over multi-crop agricultural land. Rest of the land is forest, scrubland and grassland and habitat of critical wildlife species</p>	<p>I. The people of this area practice rainfed agriculture based on information of agriculture officer, Mirzapur and Site Inspection report prepared by Vindhyan Ecology and Natural History Foundation. Therefore the proposed project will helpful of the development of the region.</p> <p>Out of 875 acres of the proposed project site, the maximum land is barren land (97.58 %). Only 1.78% is single crop agriculture land & 0.62 % is human settlement. The site is free from human habitation.</p>
	II.	<p>Vicinity to the railway line for laying railway siding for coal transportation</p> <p>Sakteshwar railway station is 15km far. No road or railway line connects the project site and railway station. The area between project site & railway station is forest land.</p>	<p>II. The coal transportation form the Sarsongram railway station will be done by Rail/OLBC. However if the Coal transport corridor passes through forest land the work initiation will be done after all statutory clearance</p>
	III.	<p>Adequate land being available for coal storage yard</p> <p>This could not be criteria for site selection. Air pollution and noise from transportation and handling of coal will have significant impact on environment and forest.</p>	<p>III. The coal transportation form the Sarsongram railway station will be done by Rail/OLBC.</p>
	IV.	<p>Suitability of land from topography, geological aspects</p> <p>It is suitable agricultural land and forest area is very much suitable for herbivores. Sloth bear and monitor</p>	<p>IV. The project site is proximate from this location only and have minimal impact on ecology as envisaged from this point. Out of 875 acres of the proposed project site, the maximum land is barren land (97.58 %) Only 1.78% is single crop agriculture land & 0.62 % is human settlement. The</p>

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		lizards are dominant in the project site.	site is free from human habitation.
V.	Proximity to highways for transport of heavy equipment	The highway is 1.5km away from the project site and there is no road connecting the proposed project site. Only link between SH-5 and the project site is a narrow forest road which is part of forest land	V. The project site is 1.5km from SH-5 in south as adduced in the Vidhya Bachao report. The forest road connecting the project site will be utilized only after complying to statutory requirements. Moreover if forest road widening is unavoidable necessary forest clearance will be taken as per the Statute.
VI	Facility for interconnection with transmission system for evacuation of power	There are several high transmission lines already going over the project site. There is ongoing effort to shift those transmission lines by BHU & local administration	VI. Power Evacuation from the Power Plant will be done at 400 KV level. Power generated from the station, shall be evacuated by UPPTCL from power plant 400 KV switchyard.
VII	Environmentally suitable, absence of sensitive areas and major settlements	Very good environmental conditions & ecologically very sensitive as only a few patches of such forests are remaining. These areas should be disturbed as less as possible.	VII. Out of 875 acres of the proposed project site, the maximum land is barren land (97.58 %). Only 1.78% is single crop agriculture land & 0.62 % is human settlement. The site is free from human habitation.
VIII.	Availability of infrastructure facilities	There is no infrastructure suitable for setting up a thermal power plant including water and road.	VIII. Accordingly we have ensured the following infrastructural facilities to be adopted: <ul style="list-style-type: none"> o Water transportation through pipeline from Ganga to site via intermediate storage in Upper Khajuri dam with firm approval from State & Central Government o 100% land is under possession with diversification to industrial land o Proposed coal transportation through rail, road & conveyer belt.
7.	Taking signatures by wrongly misleading people for job		The facts are wrongly presented by you. Welspun Energy Uttar Pradesh Pvt. Ltd. received signed documents from villagers with their general opinion about proposed project. The job application was circulated in September 2013 is not related to the proposed project.



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8.	Few other important issues related to the thermal power project	
	<p>I. Banaras Hindu University and local people are strongly against the project.</p> <p>II. No details provided where the water will be discharged</p> <p>III. Water source from Jan to May is not clear</p>	<p>I. Successful completion of Public Hearing by State Administration & Pollution Control Board is the best evidence in favor of project by local community. Welspun is keen for the environment and human value for the local community. Our EIA study reveals insignificant impact on human health due to plant activities with robust Environment & social Management Plan. Moreover, south campus of BHU and other local community does not fall under the influence area i.e., 2 km (refer air dispersion model in EIA study).</p> <p>II. Estimated Fresh Water Requirement (4002 Cum/hr) works out to about 3 cum/hr /MW which is being adopted in the Industry and recommended in CEA document.</p> <ul style="list-style-type: none"> o Water Requirement is optimized by adopting high COC of 5 for CW system. o Major quantity of effluent (CW blow down) shall be used in the plant. Out of 888 Cum/hr, about 860 Cum/hr shall be utilised i.e. about 96% o Estimated Waste Water Quantity to be disposed off is 28 Cum/hr is about 0.69% of fresh makeup water quantity of the project. o Waste water quality will be maintained while discharge in nearest nallah drain. o Expected Discharge Water Quality o PH 6.5-8.5 , TSS ≤ 100 mg / l , COD ≤ 250mg/l , BOD ≤ 30 mg/l , Oil & Grease ≤ 5 mg/l o The live storage capacity of Upper Khajuri Dam is 42.28MCM. o Power Plant and Irrigation requirement of water during lean season is 18MCM +9.5MCM= 27.5MCM. o Considering 20% for loses due to evaporation, water requirement is 33MCM. o Thus, the water requirement for both power plant and irrigation during lean period can be fulfilled by utilizing the Upper Khajuri Dam. and there will be no impact on lower khajuri dam.
	IV. Coal Source Still not defined	<ul style="list-style-type: none"> o Application was filed for long term coal linkage from MCL/ NCL/SECL mines & submitted to MoC in 29th December, 2010. Due to delay in grant of coal linkage, WEUPPL has decided to use Imported coal from Indonesia as interim arrangement. An agreement for 5.50 MTPA coal supply is signed with Sirdi Sai Goodearth International PTE Ltd. We will convey to MoFF further after getting firm linkage of domestic coal.

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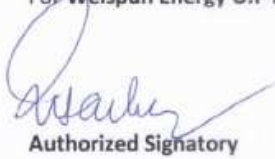
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Hope you will find the same in order.

Thanking you

For Welspun Energy U.P Pvt. Ltd.


Authorized Signatory

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