

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL EASTERN  
ZONE BENCH, KOLKATA

10 JUL 2025

ORIGINAL APPLICATION NO. 11/2025/EZ

NOTARISED

IN THE MATTER OF:

ARUNA KUMAR JENA & ORS.

... APPLICANT

VERSUS

STATE OF ODISHA & ORS.

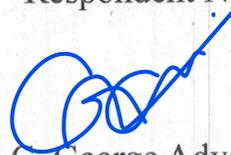
...RESPONDENT (S)

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Respondent No. 12

Through

  
Gigi C. George Advocate  
Standing Counsel (UOI)

Ch. No. 457, Lawyers Block, DHC, New Delhi

[Gigicgeorge.adv42@yahoo.in](mailto:Gigicgeorge.adv42@yahoo.in),

M-9810625315

dt.10-07-25



Bikram Kumar Sahoo

**NOTARISED**

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL EASTERN  
ZONE BENCH, KOLKATA**

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**... APPLICANT**

**VERSUS**

**STATE OF ODISHA & ORS.**

**...RESPONDENT (S)**

**REPLY BY WAY OF AFFIDAVIT ON BEHALF OF RESPONDENT NO. 12.**  
**i.e. REGIONAL DIRECTOR, CENTRAL GROUND WATER BOARD,**  
**SOUTH EASTERN REGION, BHUBANESWAR**

**Most Respectfully Showeth:**

I, **BIKRAM KUMAR SAHOO**, aged about 53 years working as Regional Director in the office of the Central Ground Water Board, Govt. Of India, Ministry of Jal Shakti, Department of River Development Ganga Rejuvenation, South Eastern Region, Bhujal Bhawan, Khandagiri, Bhubaneswar – 751030, the deponent herein do hereby solemnly affirm and state on oath as under: -

1. That I am competent to swear the present reply by way of affidavit on behalf of Respondent No. 12 i.e. Regional Director, Central Ground Water Board, South Eastern Region, Bhubaneswar and I am aware of the facts and circumstances of the case based on record.



*Bikram Kumar Sahoo*

**NOTARISED**

2. That, I have perused the contents of the above captioned O.A. and I am duly authorized to depose by way of the present affidavit.
3. That the answering respondent is not replying to the present application in para-wise manner and craves leave to file a detailed affidavit as and when necessary and required by this Hon'ble Tribunal.
4. That the instant Original Application 11/2025 has been filed by the Applicant alleging that the illegal operation of Road Metal Quarries in BAJABATI (CLUSTER SL NO.3A) under Dharmasala Tahasil of Jajpur district in Odisha. That the applicant further stated that there are 6 stone quarries exist in the Cluster 3A of Bajabati, among those 2 stone quarries are operating in violation of govt. guidelines and two are closed down by the Deputy Director of Mines Jajpur.
5. That applicant raises issues of the quarries which are in violation of environment norms are, BAJABATI BSQ-3 and BAJABATI BSQ-5, over khata no. 215, plot no. 823 (P), Kissam-Pathar Chattan and Khata No-215, Plot No-823(p) respectively. That all the above-mentioned quarries are operating by the lessees and AGRAWAL INFRABUILD PRIVATE LIMITED (BSQ-3&5) in violation of conditions of Environment clearance and plan.
6. That applicant further alleged that apart from this the quarry is operating using explosives with in 200meters from the residential houses. There has been no monitoring of compliance of conditions and the requirement of submission of quarterly compliance report has not been furnished and uploaded by the project proponent as well as Tahasildar for which the EC is liable to be cancelled as per condition no 2.23 of EC letter.

Pickram Kumar Sahoo



## NOTARIAL

7. That further the applicant in para 20 of the OA has raised the concern that the applicant had verified the website of Central Ground Water Authority <https://cgwanoc.gov.in/Sub/Report/NOCIssuedLetter/NOCIssusedLetterToExtUserPage.aspx> and could not find any permission if any granted to the quarries and the crushers located in Bajabati mouza, hence this also confirms that the quarry and crushers are extracting ground water through borewells without any valid NOC from the Central Ground Water Authority (CGWA).
8. That the Hon'ble Tribunal vide its order dated 23.01.2025 observed that the issues are of concerned and issued notice to the answering respondent and directed to file counter affidavit.
9. That it is humbly submitted that the quarries and the crushers located in Bajabati mouza are not obtained NOC from CGWA for extraction of ground water. It is further submitted that in this respect a Show Cause Notice has been served to M/s Agrawal Infrabuild Private Limited (Lessee of Bajabati BSQ-3&5).
10. That it is submitted that the project proponent is extracting ground water without valid NOCs from the answering respondent.
11. That the present Reply by way affidavit may kindly be taken on record and into consideration and the Hon'ble Tribunal may pass appropriate order(s), direction(s) as deemed fit and proper under the facts and circumstances of the present case.
12. That the Answering Respondent seeks leave to make additional submissions, if required, during the course of the proceedings as and when directed by this Hon'ble Tribunal.

Poikram Kumar  
DEPONENT

Sahas  
Kumar  
Poikram

Sahas

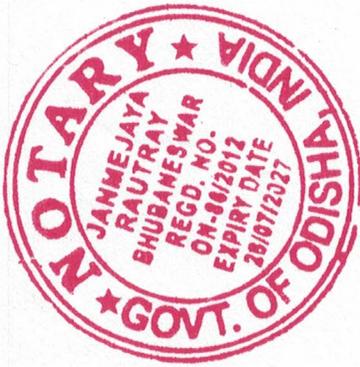


# NOTARISED

## Verification

I, **BIKRAM KUMAR SAHOO**, do hereby verify on 10/7/25 at Bhubaneswar the contents of the above paragraphs which are true to my own knowledge and/or are in the nature of legal submissions which I believe to be true and no material has been suppressed herewith.

*Bikram Kumar Sahoo*  
DEPONENT



The above named deponent(s) being duly identified by Sri..... Advocate, Bhubaneswar  
Appears before me on dt. 10 JUL 2025 at..... A.M./P.M. ....  
on oath the contents of this affidavit are true to the best of his / her / their knowledge and belief

Deponent(s) Notary, Bhubaneswar

*[Signature]*  
**JANMEJAYA RAUTRAY**  
**NOTARY, GOVT. OF ODISHA**  
**BHUBANESWAR**  
**REGD. NO-ON-86/2012**  
**Moh No. - 9337121273**



V A K A L A T N A M A

BEFORE THE NATIONAL GREEN TRIBUNAL, KOLKATA/EZ

Original Application/Appeal No. 11/2025

ARUNA KUMAR JENA & ORS.

Plaintiff  
Petitioners

-Versus-

STATE OF ODISHA & ORS.

Defendant  
Opposite Party

On behalf of **Respondent No. 12**

Know all men by these presents that by Vakalatnama I/We appoint the Advocates noted below or any of them my/our lawful Advocate or Advocates for filing ..... above matter for appearing in conducting and arguing the same, for depositing or withdrawing any money in connection therewith for moving the Court in any matter connected therewith, for preparing the paper book in the case and for putting in papers petitions etc. on my/our behalf for filing taking back any documents for withdrawing suits or appeals or petitions with permission to institute fresh suits etc. For signing and filing petitions of compromise in connections with said matter and for taking copies of paper form the Record and I/We further say that any act, done by my/one said Advocate or Advocates or by any of them after accepting this Vakalatnama, shall be considered as my/our true and lawful act.

And I/we further hereby agree and undertake to pay the said Advocates his or their fees are settled and all others sums that may be necessary to carry out the requisition of the Court and otherwise to enable the said Advocates to conduct properly. Failing which the said Advocates after notice to me/us will be liberty to withdraw form the further conduct to the case.

IN WITNESS WHERE OF I/We sign and execute this Vakalatnama on this the.....<sup>09</sup>.....day on.....<sup>07-</sup>.....2025

NAME OF ADVOCATE  
**Gigi C George, Adv**  
Standing Counsel  
Ch. No.336, Lawyers Chamber Block,  
Saket District Court, New Delhi  
Also at Ch.457, Block-1  
Delhi High Court, New Delhi  
Enrol No.D1154@/1999  
Mob: 9810625315  
Email: gigicgeorge.adv42@yahoo.in

*Bikram Kumar Sahu*  
CLIENT