



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

EASTERN ZONE BENCH, KOLKATA

ORIGINAL APPLICATION No. 80 of 2025

IN THE MATTER OF:-

Satrudhan Prasad

..... Applicant

Versus

State of Jharkhand and Ors.

..... Respondents

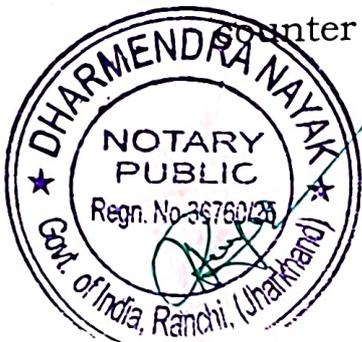
**COUNTER AFFIDAVIT ON BEHALF OF THE RESPONDENT**

**NO.3**

**(JHARKHAND URBAN INFRASTRUCTURE DEVELOPMENT  
COMPANY LTD.)**

I, Shashank Shekhar Kamal, S/o Prem Chand Sahu, R/o Sector-2 H.E.C. Colony, Dhurwa, Ranchi do hereby solemnly affirm and state as follows:

1. That I am presently working as Project Manager in Jharkhand Urban Infrastructure Development Company Ltd. and am well acquainted with the facts and circumstances of the instant case.
2. That I am competent and otherwise authorized to swear this counter affidavit on behalf of the answering respondents.



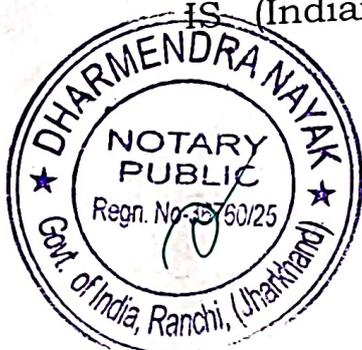
3. That accordingly I have gone through the contents of the Original Application under reply and have fully understood the same.

4. That the answering Respondent is a government undertaking engaged in the planning and execution of urban infrastructure development projects, including water supply works, and it is discharging its duties strictly in accordance with law and guidelines issued by competent authorities.

5. That JUIDCO Ltd. is executing the work titled "*Augmentation and Strengthening of Ranchi Water Supply Scheme Phase-I under Ranchi Municipal Corporation*" as per Agreement No. 294 (JUIDCO) dt. 04.12.2018 executed with M/s. Larsen & Turbo Ltd.

6. That in furtherance of the above project, the water supply pipeline was laid in Mahavir Nagar, Argora, Ranchi well before any sewerage or drainage work was initiated in the area.

7. That the water pipeline was laid in full compliance with the IS (Indian Standards) code guidelines and as per the

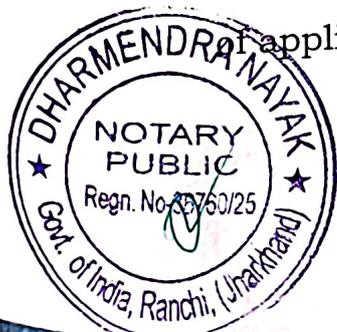


CPHEEO (Central Public Health and Environmental Engineering Organization) guidelines; all due care was taken to ensure safe vertical and horizontal separation from any existing or proposed drainage systems.

8. That as per Manual on Water Supply and Treatment Systems (Drink from Tap), CPHEEO guidelines Clause 12.9, "Protection against Pollution near Sewers and Drains" for Vertical Separation when water mains cross a lateral sewer line, storm drain or sanitary sewer, they should be installed such that the bottom of water main is 0.5 m above the top of the drain or sewer and the mains are as far away from sewer as feasible for Horizontal Separation a minimum gap of 3m must be maintained between water main pipeline and drain/sewer.

9. That the apprehensions of the Applicant regarding the alleged contamination of drinking water due to inclusion of water pipeline within the sewer/drainage line are misconceived and misplaced. No part of the pipeline laid by JUIDCO Ltd. was located inside the sewer drain in violation

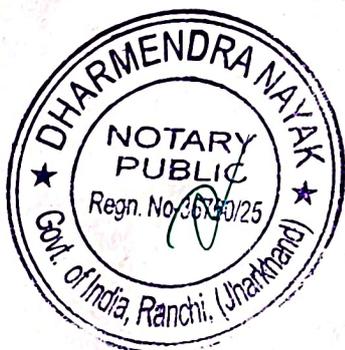
of applicable guidelines.



10. That the answering Respondent is not involved in the construction or execution of any sewage/drainage system in the area in question. The same is being undertaken by Respondent No. 2, Ranchi Municipal Corporation. Therefore, the answering Respondent cannot be held liable or responsible for the design or execution of any such sewage work or its alleged intersection with existing water supply lines.

11. That the application filed by the Applicant does not establish any violation or negligence on the part of Respondent No. 3. The water supply infrastructure was designed and installed much before the sewage system, and any overlapping is the result of subsequent construction activities not carried out by the answering Respondent.

12. That the answering Respondent remains fully committed to upholding the integrity and safety of the drinking water supply and expresses willingness to undertake any necessary inspections or verifications in coordination with



the appropriate authorities, as may be deemed necessary, to address any concerns or apprehensions raised.

13. That the answering Respondent prays for dismissal of the present application as far as it concerns Respondent No. 3, as there is no cause of action against it and the allegations are baseless and unsubstantiated.

14. That the present affidavit is true to the best of my knowledge and information received from the answering Respondent and nothing material has been concealed therefrom.

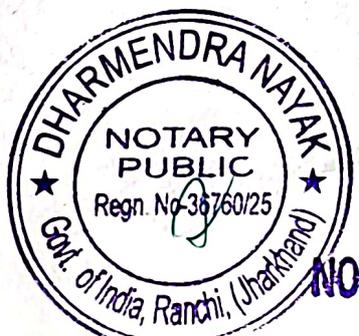
*Shakar*  
**Deponent**  


**Verification**

Verified at Ranchi, Jharkhand on the 04 AUG 2025 day of August, 2025 that the contents of the above said affidavit are true and correct to the best of my knowledge and belief. Nothing material has been concealed therefrom.

*Shakar*  
**Deponent**  


Authorised Under Notaries Act 1952 & Notaries Rules 1956 Govt. of India Ranchi, Jharkhand



*[Signature]*  
5  
04/08/25  
**NOTARY PUBLIC RANCHI**

*[Signature]*  
Signature Attested on Identification of Lawyer  
803/02



Court of National Green Tribunal, Eastern Bench.  
**In the High Court of Jharkhand at Ranchi.** Kof. Katta.  
**VAKALATNAMA FOR** Respondent No. 3

Original Application.....No...80.....of 20 25

Satnughan Prasad

....Petitioner

Versus

State of Jharkhand & Ors.

....Respondent/Opposite Party

Know all man by these presents that by this Vakalatnama

I/We ~~Sh~~ Shashank Shekhare Kamal, S/O Prem Chand Sahu, Resident of: Sector-2, HEC, Colony, Dhurwa, Ranchi, Currently posted as Project Manager JUIDCO LTD.



Shashank

Do hereby

Appoints the advocates noted below in the margins or any of them as my/our lawful Advocate in the above mentioned case for appearing in conducting and arguing the same for depositing or withdrawing any money in connection there with for putting in paper petition etc. on My/our behalf for filling or taking back any document or with drawing suit or appeal with permission to institute fresh suit etc. and make compromise and for referring the case to arbitration and for doing act that be necessary that any act done by me/our said advocate or any one of them after accepting this Vakalatnama shall be considered as my/our true them lawful act.

Mr. Krishna Murali, Jharkhand High Court Ranchi.

Mr.

Mr.

Date 24.07.2025

Re-ceived the Vakalatnama on behalf of the executants (s)  
and being satisfied, accepted the same.

1)  
AN  
(6454/99)  
24/07/2025  
IB/227  
8-920464956 b.