

BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,
NEW DELHI
EXECUTION APPLICATION NO.41 OF 2023
IN
ORIGINAL APPLICATION NO.94 OF 2021

IN THE MATTER OF:
HAIDER ALI

.... APPLICANT

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

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Next date of listing 16.01.2026

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Dated: 14-01-2026
New Delhi

BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,
NEW DELHI

EXECUTION APPLICATION NO.41 OF 2023

IN

ORIGINAL APPLICATION NO.94 OF 2021

IN THE MATTER OF:

HAIDER ALI

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...RESPONDENTS

ADDITIONAL REPLY AFFIDAVIT ON BEHALF OF DR. Y.S. RAJASEKHARA REDDY ACA - VDCA CRICKET STADIUM - RESPONDENT NO. 11 PURSUANT TO THE ORDER DATED 19-03-2025 PASSED BY THIS HON'BLE TRIBUNAL.

I, Sana Sathish Babu, S/o. Sana Subba Rao, aged about 53 years, C/o. The Andhra Cricket Association, Dr. YSR ACA-VDCA Cricket Stadium, D.No.10-24/1, NH-16, Pothinamallayyapalem, Viskhapatnam, Andhra Pradesh- 530 041, do hereby solemnly affirm and declare as under:

That I am presently working as the Honorary Secretary of the Andhra Cricket Association which manages Respondent No.11 Stadium in the present Application and I am fully conversant with the facts and circumstances of the present case and I am therefore, competent and authorized to swear the present Affidavit.

1. The instant Additional Reply is being filed by the Answering Respondent, Dr Y.S. Rajasekhara Reddy Andhra Cricket Association – VDCA Cricket Stadium (Respondent No. 11), pursuant to the Hon'ble Tribunal's order dated



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19.03.2025, and to provide updated status on compliance with all earlier directions passed in O.A. No. 94 of 2021. This Additional Reply supplements the Reply dated 01.07.2024, earlier filed by the Answering Respondent, and incorporates fresh developments up to November 2025.

2. The reply of the answering respondent to the aforesaid queries of this Hon'ble Tribunal are as follows:

a. **The status of the RWHS installation in the Andhra Cricket Association (stadium):**

The Answering Respondent has completed the physical construction and installation of two (2) Rain Water Harvesting (RWH) and groundwater recharge structures at the stadium, built to specifications with graded pebbles and silica sand filtration layers. The systems are scheduled to be fully operational and brought into force by 2026.

It is further submitted that as per the Report submitted by the environmental expert, the total rainwater harvesting potential at the stadium is 22,366 m³ annually considering highest rainfall day in a year.

Report on Water Management by SV Enviro Labs and Research Pvt Ltd., is annexed herewith as ANNEXURE R11/1.

S.No	Location	Capacity
1	Bore well near gate no.15	3HP-Submersible Pump-3 phase



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2019
ments
quifer

2.	Bore well near gate no.8	2HP-Submersible pump-single phase
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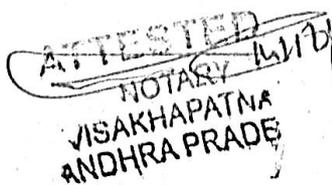
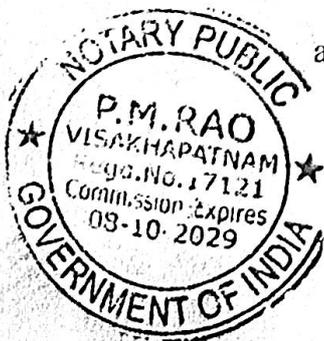
b. Extent of groundwater drawal:

The Answering Respondent is managing its groundwater extraction with the highest degree of responsibility and in full adherence to the principles of sustainable water resource management. The Answering Respondent confirms that two borewells are currently operational on the premises. The particulars are as follows:

Each of these borewells is equipped with a functional flow meter to accurately monitor and record groundwater extraction, ensuring full transparency and data availability for the regulatory authorities. Furthermore, the borewell is integrated with an artificial groundwater recharge mechanism. This demonstrates the Answering Respondent's commitment to not just extracting, but actively replenishing the aquifer, thereby mitigating the environmental impact and contributing to water conservation efforts.

c. Permission for the borewell:

The Answering Respondent has duly applied for a No Objection Certificate (NOC) for the borewells at the stadium. The processing of this application is currently pending with the Groundwater and Audit Department, Government of Andhra Pradesh. The Department, vide its letter dated August 5, 2024, has communicated that the delay is due to an internal issue at the Treasury Office concerning the generation of a



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code, which is a prerequisite for creating the payment challan. The Department has assured that this issue is expected to be resolved shortly, after which the Answering Respondent will be notified to make the payment, enabling the survey and issuance of the NOC. Copy of the Letter dated 05-08-2024 issued by the District Ground Water Officer (FAC) Ground Water and Audit Department, Government of Andhra Pradesh is annexed herewith as ANNEXURE R11/2.

d. **Monthly and yearly use of the quantity of water for irrigating the ground:**

It is submitted that the Answering Respondent has appointed an independent environmental expert to assess water consumption, conservation potential, water budgeting, sewage generation, and the feasibility of treatment, reuse, and recharge interventions. As part of this assessment, reports from SV Enviro Labs have been obtained, detailing monthly and annual freshwater usage.

The current water requirement at the ACA-VDCA Stadium varies depending on the scheduling of cricket matches. The stadium employs approximately 70 full-time staff. At present, groundwater serves as the primary water source. The estimated water demand is outlined below:

sr.no.	event	No of people	requirement/ person litres	Total water demand(KLD)
1.	Non match days	70	10	0.7
2.	Match days	25000	10	250

Note: On average, three match days are held per year as per the current calendar.



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ANDHRA PRADESH
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The assessment establishes that daily water demand is minimal during non-event periods, amounting to only 0.7 KLD. This water is used chiefly for irrigating the Bermuda grass pitch, where it permeates the subsoil. During match days, however, demand rises substantially to approximately 250 KLD.

e. **Proportion of STP-treated water and its feasibility:**

The answering respondent respectfully submits that the mandate for a Sewage Treatment Plant (STP) at the ACA-VDCA Stadium is untenable on grounds of technical impossibility, economic non-viability, and environmental unsustainability, making compliance unduly burdensome and irrational. Erratic usage of sewage treatment plants can trigger a cascading failure:

1. Analysis of Wastewater Generation

The wastewater generation at the stadium is characterized by extreme variability, as detailed below:

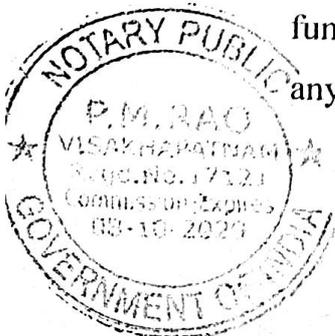
Sr.No.	event	Water consumed(KLD)	Waste water generated(KLD)
1	Non match days	0.7	0.56
2	Match days	250	200

Note: As per the match calendar, there are, on average, only 3 match days per year.

2. Feasibility of STP

2.1 Technical Impossibility and Operational Infeasibility

a. **Minimal & Non-Viable Hydraulic Load:** For non-match days, the stadium generates a negligible 0.56 KLD of sewage. This is fundamentally incompatible with the minimum operational capacity of any commercially viable STP, which typically starts at 20 KLD.



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Operating a plant designed for 20 KLD with less than 3% of its design inflow is technologically unworkable. It would lead to:

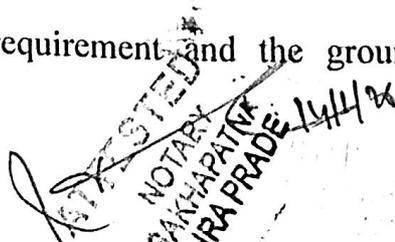
- i. Biological System Collapse: Essential bacterial cultures starve and die or become inactive.
- ii. Process Failure: This leads to sewage stagnation, septic conditions, foul odours, and the discharge of inadequately treated effluent, violating mandated environmental standards.
- iii. Mechanical & Structural Issues: Critical components—including aeration systems, control mechanisms, and sludge digestion processes—fail due to the irregular operational schedule.

2.2. Intermittent Usage Crisis: An STP is a biological system requiring consistent flow. Using it intensively for only 3-5 days a year would guarantee system failure, requiring a complete restart of the biological process before each event—a procedurally unreliable and impractical solution.

2.3. Environmental Unsustainability and Redundancy

- a. Absence of Beneficial Use: The stadium's primary, year-round water demand is for irrigation (>20 KLD), currently met sustainably via groundwater. This groundwater completes a natural hydrological cycle by percolating back into the soil.
- b. Redundant Output: Even if an STP could be artificially sustained on non-match days, its maximum output would be 0.56 KLD, meeting less than 3% of the daily irrigation need. The groundwater source would remain indispensable, making the STP redundant.
- c. Net Environmental Loss: The theoretical suggestion of using fresh water to "feed" the STP during non-match days is an unsustainable practice—consuming potable water to create non-potable water. This results in a net loss of a precious resource, contravening the Precautionary Principle and the fundamental tenets of Sustainable Development.

Conclusion - The mandate fails to establish a rational nexus between the requirement and the ground reality. The stadium's unique usage



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pattern—with extreme demand spikes on only 3 days amid minimal baseline operation—makes a fixed-capacity STP an engineering and financial misfit. It imposes an impossible condition without delivering any tangible environmental benefit.

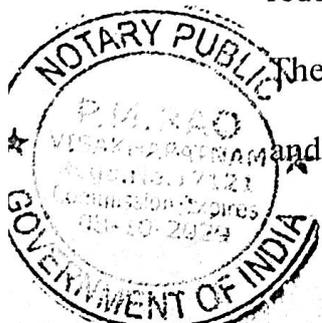
The current practice of utilizing groundwater for irrigation constitutes a more direct, sustainable, and context-appropriate water cycle for this facility. The respondent remains committed to implementing viable water and environmental conservation measures but submits that an STP, in this specific and exceptional operational context, is neither a practicable, reasonable, nor sustainable solution.

The respondent, therefore, respectfully requests the honourable authority to reconsider the mandate and grant an exemption based on the demonstrated grounds of technical impossibility, economic non-viability, and environmental unsustainability.

f. Whether the stadium intends to continue using fresh water for irrigating the grounds and the status of the installed Rain Water Harvesting System (RWHS):

It is submitted that the Answering Respondent is making every effort to eliminate—or at least substantially reduce—the use of fresh water for the stadium’s operations. The Respondent is committed to reducing its dependency on fresh water. The completed Rainwater Harvesting System (RWHS) will fully meet non-match-day water requirements. Once operational in 2026, fresh water demand will be substantially reduced.

The construction and installation of two Rain Water Harvesting (RWH) and groundwater-recharge structures have been completed at the



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stadium. Both systems are scheduled to become fully operational by 2026.

Geologically, the stadium is located on coastal plains with predominantly laterite soils. The drainage pattern in the area is sub-dendritic to dendritic and is coarse-textured.

The relevant hydrological data is summarized below:

- Total catchment area: 14,876.7 sqm
- Annual rainfall: 1.05 m
- Infiltration potential: 85%
- Annual infiltration volume: 13,277 m³ (or 36.37 KLD)

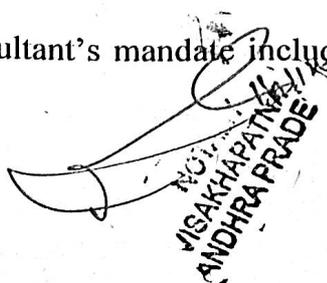
Based on scientific assessment, it is estimated that approximately 13,277 m³ of rainwater will be recharged into the groundwater aquifers annually.

On non-match days and for certain domestic/local needs, the stadium's entire water requirement will be met through harvested rainwater, ensuring sustainable use of water resources.

As stated, once the RWHS and groundwater-recharge systems are fully operational, the stadium's net fresh-water demand will be substantially reduced.

g. **Laying down a mandatory requirement of engagement of an environmental expert for every cricket stadium to ensure compliance with the environmental norms-**

The Answering Respondent has already engaged SV Enviro Labs as its environmental consultant to ensure compliance with norms. The consultant's mandate includes water budgeting, sewage management,



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groundwater studies, waste management, and CGWA compliance monitoring.

- 3. It is submitted that Respondent has fully complied with the directives of the Hon'ble Tribunal. The answering Respondent seeks leave of this Hon'ble Tribunal to file an additional reply and supplementary documents at a later stage, if so required.
- 4. It is humbly prayed that this Hon'ble Tribunal may be pleased to take the instant additional reply filed by the Andhra Cricket Association on record and consider the same while adjudicating the present proceedings.



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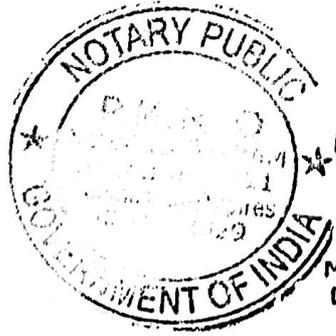
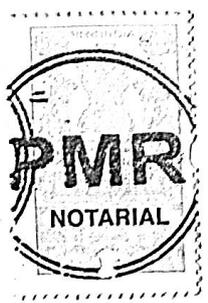
VERIFICATION

I say that the averments of facts stated herein above are true to my knowledge, no part of it is false and nothing material has been concealed there from.

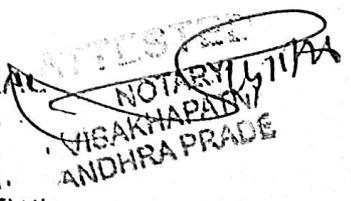
Verified at Visakhapatnam on this the 13th day of January, 2026.



S. Suti
DEPONENT



PEDAGADI MANMAHARAJU
 B.A., D.L.; M.A., LL.M., M.S.
 ADVOCATE & NOTARY PUBLIC
 (APPOINTED BY GOVT. OF INDIA,
 MINISTRY OF LAW AFFAIRS (NEW DELHI))
 D.No.44-1R-1/4/2, THATICHETLAPALLE,
 VISAKHAPATNAM-530 015
 MOBILE: 9642168703, 9542225470



REPORT ON WATER MANAGEMENT

FOR

The Andhra Cricket Association

Dr. YSR ACA-VDCA Cricket

Stadium,

D.No.10-24/1, NH-16,

Pothinamallayyapalem,

VISAKHAPATNAM – 530 041.

Jan' 2026

PREPARED AND SUBMITTED BY

SV ENVIRO LABS & RESEARCH PVT. LTD.

(Formerly known as SV Enviro Labs & Consultants)

(Environmental Engineers & Consultants in Pollution Control)

Enviro House, Block – B, B-1, IDA Auto Nagar,

Visakhapatnam - 530012

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QCI Accredited No. NABET/EIA/25-28/RA 0394



1. Introduction

1.1. Brief Note

Andhra Cricket association (ACA) was formed in the year 1953 and since then has been contributing the growth of Indian cricket. At present there are about 30 grounds in Andhra Pradesh spread in 9 districts of Srikakulam, Vizianagaram, Visakhapatnam, East Godavari, West Godavari, Krishna , Guntur , Prakasam , Nellore, YSR Kadapa, Kurnool , Chittor and Anantapur which have been recognized by ACA. Many domestic level matches are held across in the grounds in the above-mentioned districts. Amongst the 30 grounds, Dr.YSR ACA-VDCA International Stadium Located in Visakhapatnam is the most prominent one as over the years it has been hosting several international, domestic and Indian premier League (IPL) Matches.

1.2. Dr. YSR ACA-VDCA International Stadium

The picturesque ACA-VDCA (Andhra Cricket Association/Visakhapatnam District Cricket Association) ground, set on the outskirts of Visakhapatnam amidst scenic hills. The stadium currently has capacity to accommodate 25,000 viewers. The stadium boasts of a scenic view of the hills and the pleasant breeze allowed into the ground from the Bay of Bengal located westwards by the low-lying stands. Till date the stadium has hosted 3 test matches, 11 ODI's (One day Internationals) and 3 T20I's (T20 International Matches) and is envisaged to host further matches , making it one of the most prominent grounds in India.

1.3. Scope of Study

The present study focusses on the comprehensive assessment of water management that is being currently practiced at the ACA-VDCA Stadium. It covers aspects which include, present water sources, peak utilization, Waste water generation, existing treatment mechanisms, water existing conservation structures , contour levels along with them proposed are the best management practices to ensure effective water utilization , waste water treatment, rainwater harvesting etc.

2. General Profile of ACA VDCA stadium

Location	Visakhapatnam , Andhra Pradesh
Climate	Tropical Wet and Dry Climate classified as Aw -as per Koeppen's system
Annual Rainfall	1113.1 mm (IMD Climatological normals)
Mean Temperature	34°C
Soil type	Laterite and lateritic soil
Total playing area of the ground	14876.7 sqm
Diameter	140.2m
Radius	70.1 m

2.1. Water Requirement

Current water requirement at the ACA-VDCA stadium varies based on the cricket matches that are held. Full time employees at the ACA-VDCA stadium about 70, and the water present water requirement is detailed below. The Current source of water is Ground water.

S.No	Event	No. of People	Requirement/person (litres)	Total water demand (KLD)
1	Non Match Days	70	10	0.7
2	Match days *	25000	10	250

Note: *As per the match calendar, on an average there are 3 match days per year.

2.2. Wastewater generation

Wastewater generation at ACA-VDCA is classified into 2 types, i.e. match day scenario and non-match day scenario. During Non-match days, very meagre quantity of waste water (0.56 KLD) is generated. During match days about 200 KLD of waste-water is generated. The management of wastewater at ACA-VDCA is very complex.

S.No	Event	Water Consumed (KLD)	Waste water generated (KLD)
1	Non Match Days	0.7	0.56
2	Match days*	250	200

Note: *As per the match calendar, on an average there are 3 match days per year.

2.3. Feasibility of STP

At present, the domestic wastewater is being disposed into the municipal drains that are adjacent to the stadium. Setting up a sewage treatment plant is not feasible as there are only 3-

match days/year. Setting up of a 200 KLD STP would cost at least 50 to 70 lakhs and further maintenance would result in an additional cost of 5 to 10 lakhs. However the major constraint is the proper functioning of STPs when they are used 3 to 5 times a year. Following are the problems associated with irregular usage of STPs.

1. Biological system collapse

- a. Death of bacterial culture
- b. Inactivity of bacterial culture

2. Mechanical/ electrical failures

- a. Aeration system failure
- b. Control system failures

3. Structural problems

- a. Sludge digestion

4. Effluent Quality problems

Note: Considering the above factors setting up of a STP at ACA-VDCA is scientifically and economically 'NOT FEASIBLE'

2.4. Carrying Capacity of Existing Drains

The carrying capacity of the existing drain is calculated by Manning's equation

$$Q = \frac{1}{n} \times A \times R^{2/3} \times S^{1/2}$$

Q - Flow rate or discharge (the carrying capacity).

A - Cross-sectional area of the actual water flow in the pipe/channel.

n - Manning's roughness coefficient, an empirical constant representing the friction of the pipe material (e.g., concrete, HDPE, etc.).

R - Hydraulic radius, calculated as the cross-sectional area of flow

S - Slope of the energy grade line (or channel bottom in uniform flow), expressed in feet per foot or meters per meter.



$n= 0.014$; $A= 0.98 \text{ m}^2$; $R= 0.45 \text{ m}$; $S= 0.01$

Note: Considering the above equation the carrying capacity of the drain adjacent to ACA-VDCA is ‘4.05 cum/sec’

2.5. Match day scenario

During the match day about 200 KLD of waste water is generated over a period of hrs*

Waste Water generation	Time	Carrying capacity of existing drain	Total time duration in sec	Time taken for the Sewage water to discharge in the drain (empty)	Time taken for the Sewage water to discharge in the drain (Half full)
200 KLD	8 hrs	4.05 cum/sec or 4005 litres/sec	28800	49 sec	98 sec or 1min 38 sec

Hence, from the above calculation, the time taken for discharge of entire 200 KLD of wastewater into the adjacent drain is about ‘49 sec’ and therefore the drains are sufficient enough to carry the water discharged from the ACA-VDCA.

2.6. Rain Water Harvesting potential at ACA-VDCA

Rain water potential at ACA-VDCA has been calculated considering roof, Paved and open areas.

2.6.1. Roof top Area

Block	Area (sq.m)	Peak Intensity during one hour of rainfall (mm/hour)*	Coefficient of run off	Rain Water Harvesting potential m ³ /Hr
South Block	3201.13	12	0.90	34571
West Block	2443.14	12	0.90	26385
North Block	1727.05	12	0.90	18652
East Block	1829.52	12	0.90	19753
Total				99361
Considering 20 minutes retention time, total storm water load				14904

*Considering heaviest rainfall in one day

2.6.2. Open Area

Block	Area (sq.m)	Peak Intensity during one hour of rainfall (mm/hour)*	Coefficient of run off	Rain Water Harvesting potential m ³ /Hr
Open/paved area	6378.05	12	0.65	49748
Considering 20 minutes retention time, total storm water load				7462

2.7. Total storm water available at site

Type	Water Available
Roof Area	14904
Open/paved area	7462
Total	22366 m³ or KLD

2.8. Daily Requirement vs Storm water management

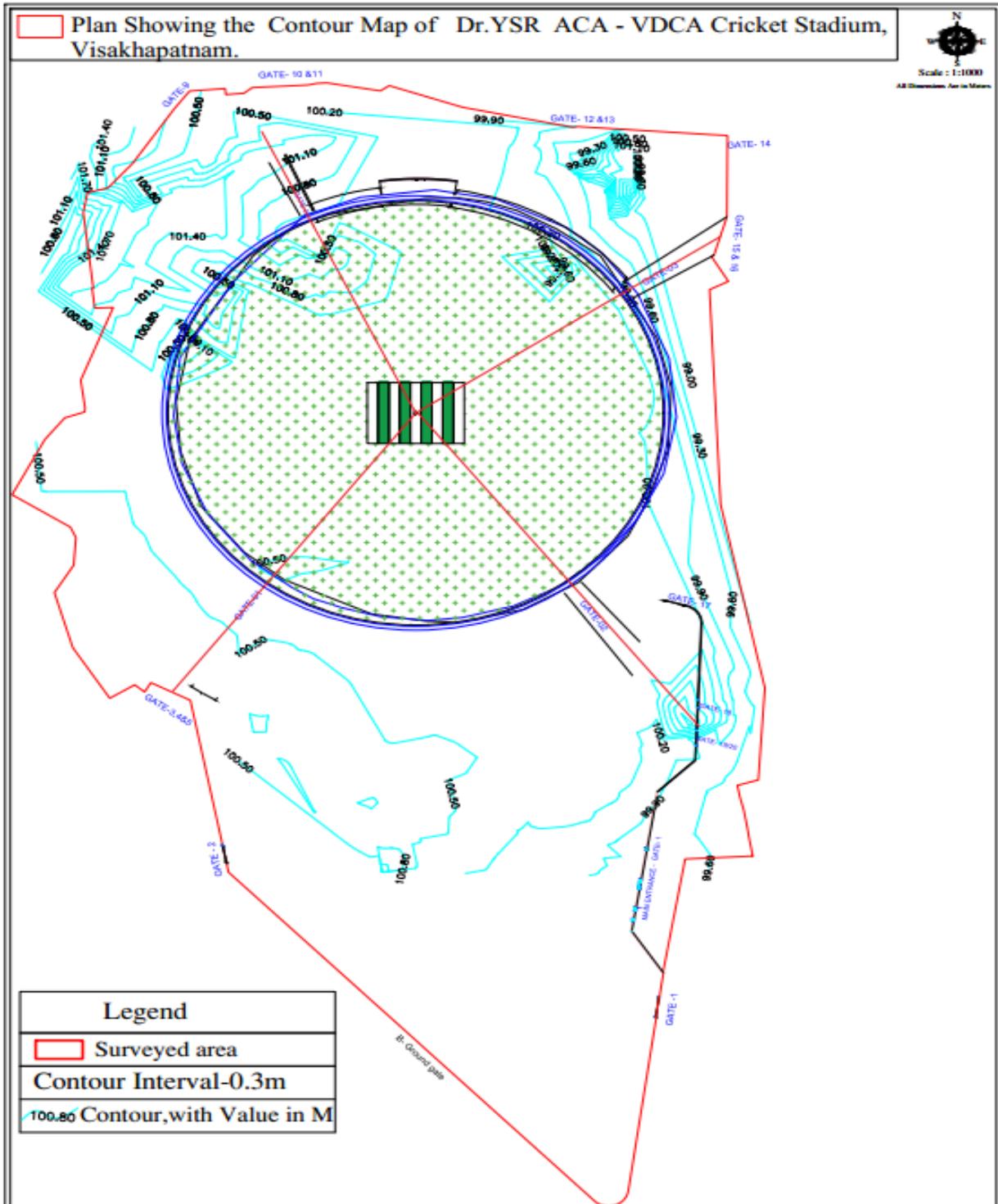
Water Requirement	KLD	Per Year requirement	Storm water Available
Non-Match days	0.7	255.5KLD	22366 KLD
Match days *	250	3750KLD	22366 KLD

*Considered 15 match days/year

The daily water requirement is 0.7 KLD during Non- Match and during match day considering 15 Match days /year is 3750 KLD. However, the peak harvesting potential of rainwater is 22366 KLD. Storage ponds at strategic locations can be set up to harvest the rainwater with the following dimensions.

Parameter	Unit
Depth	3.0 to 4 metres
Rectangular Shape	2:1(Length: Width ratio)

2.9. Contour Studies



Contour studies were carried at the ACA-VDCA stadium using DGPS equipment, total station and desktop software such as AUTOCAD. From the studies it was observed that the highest contour was 100.80 m. towards NW direction and the lowest contour was 99.0 m observed towards E direction. The contour interval was 0.3m, hence from the study the flow of water will be more towards from North West to eastern side. Hence, any storage structure constructed towards Eastern side would be more feasible. However owing to the land availability rain water storage structures can be constructed on any direction if proper pipelines are provided.

2.10. Infiltration Potential of ACA-VDCA ground:

Geologically the stadium is in coastal plains and predominantly with laterite soils and the drainage in the area is sub-dendritic to dendritic nature of drainage pattern and is coarse textured.

Total Playing area of ground	Annual Rainfall	Infiltration potential (%)	Annual infiltration/year
14876.7 Sqm	1.05m	85	13277 m ³ or KLD

From the study based on scientific assumptions it is evident that about 13277 m³ of rain-water is infiltrated to the ground water aquifers.

2.11. Key Findings and Suggestions

1. The stadium currently has capacity to accommodate 25,000 viewers.
2. Till date the stadium has hosted 3 test matches, 11 ODI's (One day Internationals) and 3 T20I's (T20 International Matches).
3. Total playing area of the ground is 14867.7 sqm
4. The current source of water is Ground water. The total water requirement during non-match days is 0.7 KLD and during match days is 250KLD.
5. The waste water generated during Non-Match days is 0.56 KLD and during Match Days is 200 KLD.
6. Setting up of STP, based on match day requirement (250KLD) is not feasible as the number of match days/year are 5 to 10 and the proper functioning of STP becomes impaired due to several factors as outlined in the report.
7. As per the Notification S.O 1509 (E) dated 29th March 2023 'Guidelines to regulate and control Groundwater extraction in India, 2020', Paragraph 4.3 it has been mentioned "All stadiums, cricket grounds, and other sports grounds/courts, golf courses etc. shall construct/install appropriate mechanism for artificial recharge of ground water / rain water

harvesting. To harvest the existing rainwater runoff it is not possible to construct as many rainwater harvesting pits.

8. There are 2 RWH pits located in the stadium one with a dimension of 2.3m x 1.7m x 1.5 and one with a dimension of 1.33m x 1.33m x 1.5m
9. From the studies it was observed that the highest contour was 100.80 m. towards NW direction and the lowest contour was 99.0 m observed towards E direction. Hence, any storage structure constructed towards Eastern side would be more feasible. However owing to the land availability rain water storage structures can be constructed on any direction if proper pipelines are provided.
10. Hence water storage ponds based on area availability can be planned with a depth of 3 to 4m.
11. As per table 5.1 Guidelines to regulate and control Groundwater extraction in India, 2020', ground water charges are applicable when the consumption is beyond 25 m³/day. At ACA VDCA the daily consumption is 0.7 KLD and on match days it is about 250 KLD. Considering 15 match days per year the average daily consumption would be 11 m³/day Approx.
12. The total Infiltration potential of playing area of stadium is 13277 m³ and the water is being unfiltered into the ground water aquifers directly contributing in overall recharge of ground water resources.
13. The total rainwater harvesting potential at the stadium is 22366 m³ considering the highest rainfall day in a year.
14. The carrying capacity of the existing municipal drains are enough to withstand the wastewater flow during match days. During ideal conditions it would take 49 seconds for discharge of entire waste water generated during match days.
15. Installation of 2 piezometers is suggested.

B. S. M.

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GOVERNMENT OF ANDHRA PRADESH
GROUND WATER AND WATER AUDIT DEPARTMENT

From:
Sri G.Srinivasa rao,M.Sc(Tech)
District Ground Water Officer (FAC),
Ground Water and Water Audit Dept.,
VISAKHAPATNAM.

To:
The General Manager,
The Andhra Cricket Association,
Visakhapatnam.

Letter No. /Tech/2024, dated 05-08-2024.

Sir,

Sub: - Ground water and Water Audit Department, Visakhapatnam - Issue of NOC for the existing Bore well in use at YSR-ACA-VDCA International Cricket stadium, Visakhapatnam-Regarding.

Ref :- Your request for NOC vide letter # ACA/RWH/03/05-24,Dated 17-May-2024,CGWA direction, NGT orders referred in your letter & clearance letter issued by pollution control board regional office, Visakhapatnam.

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The date of reference document submitted by you for issuing NOC for usage of existing Borewells at Dr.YSR-ACA-VDCA International Cricket Stadium, Visakhapatnam got verified & analysed thoroughly. We have been facing issue from the Treasury office for code generation, which is necessary for raising challan on payment of challan only, we can process survey and issue necessary NOC accordingly. Code issue is expected to be resolved shortly, after which we will inform to your office to get the challan paid.

For K. Pushpa latha 05/08/24
DISTRICT GROUND WATER OFFICER (FAC),

05/08/2024

B.S.M

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BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,

NEW DELHI

I.A. NO. OF 2026

IN

EXECUTION APPLICATION NO. 41 OF 2023

IN

ORIGINAL APPLICATION NO. 94 OF 2021

IN THE MATTER OF:

HAIDER ALI

.... APPLICANT

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UNION OF INDIA & ORS.

...RESPONDENTS

**APPLICATION SEEKING CONDONATION OF DELAY IN FILING THE
ADDITIONAL REPLY AFFIDAVIT**

MOST RESPECTFULLY SHOWETH:

1. That the Applicant has filed the present Application seeking initiation of proceedings against the Respondents for disobedience of the order/judgment dated 15-04-2021 passed by this Hon'ble Tribunal in OA No. 94 of 2021 .
2. That the contents of the accompanying Additional Reply may be read as part of the present application as the same are not repeated hereunder for the sake of brevity.
3. It is submitted that this Hon'ble Tribunal by its order dated 19-03-2025 had directed the Respondents to file an additional reply disclosing monthly and yearly use of quantity of water for irrigation of the Cricket Ground, proportion of STP treated and freshwater supplied from Municipality or any

other source. Thereafter, when the matter was listed on 13-10-2025, this Hon'ble Tribunal was pleased to grant a further time of four weeks to the Respondents to file the additional reply.

4. It is submitted that pursuant to the last order passed by this Hon'ble Tribunal, the Answering Respondent had sought for the report on water management from SV Enviro Labs & Research Private Limited. The concerned agency after conducting a comprehensive assessment of water management that is being practiced at the Stadium managed by the Answering Respondent, submitted a Report in the second week of January 2026.
5. The Answering Respondent immediately upon receipt of the Report has prepared the additional reply affidavit, as directed by this Hon'ble Tribunal, and the same is being filed herewith by annexing the said Report. It is submitted that the delay that has occurred in filing the Additional Reply is because of the non-availability of the Report. It is submitted that the endeavor of the Answering Respondent was to bring out the complete facts pertaining to the water management at the Respondent Stadium and assist this Hon'ble Tribunal and therefore it was necessary and essential to bring the Report on record along with the Additional Reply.
6. It is submitted that the delay that has occurred in complying with the order dated 13-10-2025 passed by this Hon'ble Tribunal is neither deliberate nor will full and has occasioned only for the reasons which are explained hereinabove and the same is liable to be condoned in the interest of justice.

7. That the present application is being filed bonafide and the same is liable to be allowed in the interest of justice.

PRAYER

It is, therefore, most respectfully prayed that this Hon'ble Tribunal may be pleased to:

- a) Condone the delay of 64 days in filing the present Additional Reply Affidavit on behalf of the Respondent No.11;
- b) Pass any other appropriate order or orders as this Hon'ble Tribunal deems fit and proper in the facts and circumstances of the present case.

AND FOR THIS ACT OF KINDNESS YOUR HUMBLE APPLICANT AS IN DUTY BOUND SHALL EVER PRAY

FILED BY:



(JAVVAJI SARATH CHANDRA) (BYRAPANENI SUYODHAN)
COUNSEL FOR RESPONDENT NO.11

FILED ON: 14.01.2026
NEW DELHI

BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,
NEW DELHI
I.A. NO. OF 2026
IN
EXECUTION APPLICATION NO. 41 OF 2023
IN
ORIGINAL APPLICATION NO. 94 OF 2021

IN THE MATTER OF:

HAIDER ALI

.... APPLICANT

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

AFFIDAVIT

I, Sana Sathish Babu, S/o. Sana Subba Rao, aged about 53 years, C/o. The Andhra Cricket Association, Dr. YSR ACA-VDCA Cricket Stadium, D.No.10-24/1, NH-16, Pothinamallayyapalem, Viskhapatnam, Andhra Pradesh- 530 041, do hereby solemnly affirm and declare as under:

1. That I am presently working as the Honorary Secretary of the Andhra Cricket Association which manages Respondent No.11 Stadium in the present Application and I am fully conversant with the facts and circumstances of the present case and I am therefore, competent and authorized to swear the present Affidavit.
2. I say that I have read the contents of the accompanying Interlocutory Application (s) and I say that the facts stated therein are true to my knowledge and belief.



S. Sathish Babu
DEPONENT

VERIFICATION

3. I say that the averments of facts stated herein above are true to my knowledge, no part of it is false and nothing material has been concealed there from.

Verified at Visakhapatnam on this the 13th day of January, 2026.



S. Sathish Babu
DEPONENT



PEDAGADI MANNA DHARAO
S.A., B.L.; H.A.; LL.M., Ph.D.
ADVOCATE & NOTARY PUBLIC
(APPOINTED BY GOVT. OF INDIA,
MINISTRY OF LAW AFFAIRS (NEW DELHI),
D.No.44-18-1/4/2, THATICHETLAPALLEM,
VISAKHAPATNAM-530 015

ATTESTED
NOTARY PUBLIC
VISAKHAPATNAM
ANDHRA PRADESH





Byrapaneni Suyodhan <suyodhanb@gmail.com>

**Additional Reply Affidavit in EA No.41 of 2023 in OA No.94 of 2021
titled Haider Ali Vs UOI & Ors**

1 message

Byrapaneni Suyodhan <suyodhanb@gmail.com>

14 January 2026 at 20:49

To: sanobaraaliqureshi@gmail.com, gigicgeorge.adv42@yahoo.in, egov-mowr@nic.in

Sir,

Please find attached herewith copy of the Additional Reply Affidavit on behalf of Respondent No.11 in EA No.41 of 2023 in OA No.94 of 2021 titled Haider Ali Vs UOI & Ors

Kindly treat this email along with attachment as a service copy of the Additional Reply Affidavit.

Byrapaneni Suyodhan
Advocate
House No. 251, Sector - 15 A,
Noida, Uttar Pradesh - 201301,
Mob: +91 9818056506.

 **Additional Reply Affidavit.pdf**
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