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**BEFORE THE NATIONAL GREEN TRIBUNAL**

**WESTERN ZONE BENCH, PUNE**

**ORIGINAL APPLICATION NO.19/2025 (WZ)**

**In the matter of**

Abhijit Madhukar Garad

... Applicant

**Versus**

MPCB & Ors.

... Respondents

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**Respondent No.04**

Through

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Standing Counsel (UOI)  
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WESTERN ZONE BENCH, PUNE

ORIGINAL APPLICATION NO. 19/2025 (WZ)

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Abhijit Madhukar Garad

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COUNTER AFFIDAVIT ON BEHALF OF RESPONDENT NO. 04 CENTRAL GROUND  
 WATER AUTHORITY

Most Respectfully Showeth:

I, Dr. Umesh S. Balpande S/o. Shri. Sheshrao K. Balpande, Aged 48 Years, working as Regional Director (I/c) in Central Ground Water Board having office at Civil Lines, Nagpur, the deponent herein do hereby solemnly affirm and state on oath as under: -

1. That I am competent to swear the present counter affidavit on behalf of Central Ground Water Authority (hereinafter referred to as Answering Respondent) and I am aware of the facts and circumstances of the case based on record.
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. In the present O.A., the applicant has raised concerns regarding improper disposal of solid waste, particularly illegal dumping in the quarry, which has resulted in severe air and water pollution, land degradation, climate change, and significant health hazards due to the persistence of hazardous materials. This situation poses a serious threat to public and animal health, environmental sustainability, and economic development. Furthermore, the



applicant has also highlighted the direct dumping of solid waste lacking formal disposal infrastructure aggravates the issue. Groundwater contamination arises from leachate formation which is a liquid produced when water percolates through solid waste in unlined landfills or dumps. This leachate contains harmful substances like heavy metals, pathogens and organic pollutants that can seep into the ground and pollute groundwater.

5. In the petition, it is mentioned that the situation becomes worse during the monsoon, as the six waterfalls in the vicinity of the dumping site cause significant runoff, which leads to the washing away of solid waste through the surrounding village. This intensifies the environmental hazards, including soil and groundwater pollution. To study the issue in detail, groundwater sampling has been carried out from eight dugwells in the vicinity of the dumping site on 10.06.2025 by Central Ground Water Board. The analysis of the samples is currently under progress. Based on the findings, inputs along with the recommendations will be submitted to the Hon'ble court and concerned State authorities shortly.
6. That the present counter 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.
7. That other/ancillary issues raised in the application under reply do not pertain to the answering respondent. The Answering Respondent seeks leave to make additional submissions, if required, during the course of the proceedings

Verification

I, Dr. Umesh S. Balpande, do hereby verify the contents of the above paragraphs with 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.

Sworn before me on this

Jay of...13/06/2025.....at Nagpur by

Shri/Smt./Ku. ....Abhandepr...

R/o .....who has been identified

by Shri/Smt..... Self ..... Advocate, Nagpur

NOTARY  
Govt. of India  
Dist. Nagpur (M.S.) India

*J.S.B. Imp*  
Regional Director  
Central Ground Water Board  
Department of Water Resources, RD & GR  
Ministry of Jal Shakti  
Government of India  
Central Region, Nagpur

*J.S.B. Imp*  
DEPONENT  
Regional Director  
Central Ground Water Board  
Department of Water Resources, RD & GR  
Ministry of Jal Shakti  
Government of India  
Central Region, Nagpur

