

IN THE HON'BLE NATIONAL GREEN TRIBUNAL
(SOUTHERN ZONE) CHENNAI

ORIGINAL APPLICATION No.97 OF 2022

Dr.M.S. Tejashwari
D/o Late Sri. M.Sathyanarayana Reddy
R/o H. No: 3-16-668/A, Trimulgherry 'X' Roads
Secunderabad – 500015; Telangana.
Email Id-mstejashwari@gmail.com
Mob:-7702892451

... Applicant

AND

The Union of India
Rep by its Secretary,
Ministry of Defence,
North Block,
New Delhi 110001
Email Id-defsecy@nic.in
Telephone No. +91 1123012380, 1123011976
Fax: +91 1123010044 & Others

...Respondents

**MEMO FILED BY THE APPLICANT REGARDING SCOPE OF
WORK TO BE ENTRUSTED TO THE ASSESSING AGENCY**

1. The assessing agency entrusted with the determination of remediation costs shall take note of the fact that the **agricultural well** in question, having a depth of approximately **120 feet**, has **accumulated sewage and thick black sludge to an extent of nearly 100 feet**. The sludge accumulation is not natural but is the direct consequence of deliberate and continuous discharge of





sewage through two artificially created channels by the Secunderabad Cantonment Board, adopted in a high-handed and unlawful manner by trespassing into the property of the petitioner/applicant.

2. The assessing agency shall specifically examine and recommend the appropriate scientific method for removal and remediation of the sewage-laden sludge, taking into consideration **the extraordinary depth of the well and volume of contamination** the extent of contamination and long-term environmental impact.
3. While assessing the remediation costs, the agency shall strictly adhere to the norms, guidelines, and protocols prescribed by the Central Pollution Control Board (CPCB) for remediation of agricultural wells contaminated by sewage and effluents.
4. The assessing agency shall further conduct a **detailed scientific study** to determine whether the said agricultural well functions as a feeder, recharge source, or conduit for surrounding borewells and groundwater aquifers, and shall assess the extent of groundwater contamination caused by prolonged sewage accumulation.
5. In addition, thereto, the assessing agency shall carry out a comprehensive assessment of soil contamination in and around the agricultural well as well as across the remaining agricultural land of the applicant, including the depth,

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spread, and intensity of soil pollution and shall quantify the costs of soil remediation in a scientific and reasoned manner.

6. The assessing agency shall also identify and recommend effective preventive measures to stop the illegal dumping of garbage, hazardous and non-biodegradable and solid waste into the applicant's land by encroachers occupying the A-1 defence lands adjoining the applicant's land. Such assessment shall include the cost of erection of durable and permanent barriers, including heavy-duty 15 to 20 feet high stainless-steel mesh and mesh fencing, to prevent dumping of garbage by encroachers and slum dwellers from the northern and north-eastern and eastern sides of the applicant's land.
7. Further, the assessing agency shall assess and quantify the cost of remediation of the gaping breaches/holes unlawfully created by the Secunderabad Cantonment Board, through or in collusion with slum dwellers, for facilitating the flow of sewage into the applicant's property. The agency shall also evaluate the cost of permanent remedial and preventive measures required to block, divert, or eliminate the inflow of sewage so as to ensure that no sewage or effluent enters the applicant's agricultural well or land in future.
8. The assessing agency while adopting the above process must also scientifically determine the extent of damage suffered by the applicant and recommend appropriate



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compensation to the applicant for extensive damage caused to the agricultural lands.

It is therefore prayed that this Hon'ble Tribunal may be pleased to record this memo in respect of scope of work to be entrusted to the Assessing Agency and thus render justice.

Dated at Chennai this 31st day of January 2026

T. Hemalatha

Counsel for Applicant



[Signature]
ADVOCATE & CENTRAL NOTARY
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... Respondents/Respondents

MEMO FILED BY THE APPLICANT

T.HEMALATHA, R.RAJMOHAN &S.DEEPIKA

COUNSEL FOR APPLICANT
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