

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
EXECUTION APPLICATION NO. 74/2025
IN
ORIGINAL APPLICATION NO. 1306/2024
(LEGAL AID CASE AIDED BY DELHI STATE LEGAL
SERVICES AUTHORITY)**

IN THE MATTER OF:

RAMESH CHAND

...APPLICANT

VERSUS

CENTRAL GROUND WATER

AUTHORITY & ORS.

...RESPONDENTS

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THROUGH

**C. ANKEETA APPANNA
(Counsel DSLSA)**

E. No. 2259-A/2014

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New Delhi – 110024.

DATE: 13.04.2026

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PLACE: New Delhi.

Email:ankeeta.codanda@gmail.com

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
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**REPLY / OBJECTIONS ON BEHALF OF THE
APPLICANT TO THE STATUS REPORT DATED
28.01.2026 FILED BY RESPONDENT NO. 5**

MOST RESPECTFULLY SHOWETH:

1. That the present Reply/Objections are being filed by the Applicant in compliance with the directions contained in the order dated 29.01.2026 passed by this Hon'ble Tribunal, whereby the Applicant was permitted to file objections to the status report dated 28.01.2026 filed by Respondent No. 5 (Deputy Commissioner (Revenue), East District) and Respondent No. 5 was directed to verify whether the borewells which were claimed to have been sealed have again started operating and to seal the borewells in such a manner that they become completely non-functional.

2. That the three borewells under consideration in the present Execution Application situated in the premises at , C-2/45B, C-2/45E and C-2/110A , New Ashok Nagar, New Delhi- 110096 (“**said borewells**”) have been illegally dug up and are once again fully operational. The sealing was done by the authorities, despite which the owners/operators are using the borewells by carrying out fresh digging work, cementing work and installation of pipes/pumps.
3. That the Applicant, on numerous occasions, made sincere efforts to photograph the said borewells in order to demonstrate that, despite having been sealed, the same are still being unlawfully used by the residents of the locality. However, the Applicant was unable to obtain photographs of all such borewells, as whenever he visited the respective sites where the borewells were in operation, the concerned residents would create a commotion and obstruct the Applicant from taking any photographs. Nevertheless, despite such resistance, the Applicant somehow managed to obtain photographs of one such borewell situated at premises bearing No. C2/45B.
Copies of GPS-tagged images clicked by the Applicant demonstrating that the borewell situated at premises bearing No. C2/45B is still operational are annexed herewith as **ANNEXURE R-1 (Colly)**.
4. That the Applicant personally visited the site on 05.04.2026 and recorded the present ground situation through photographs and GPS-tagged images. The said photographs clearly demonstrate:

- i. Fresh excavation and digging at the exact locations where the borewells were earlier sealed.
 - ii. Workers actively engaged in construction/repair work around the borewell pits.
 - iii. Fresh cement, pipes, tools and construction material lying at the site.
 - iv. The borewells are no longer sealed and water extraction/pumping is clearly ongoing.
 - v. The addresses/GPS coordinates of the site are: C-2/45B, New Ashok Nagar, New Delhi. (All GPS coordinates and timestamps are mentioned on the photographs themselves.)
5. That the Applicant had specifically informed this Hon'ble Tribunal on 29.01.2026 that the borewell in the premises of C2/45B was still operating and that the Applicant had himself seen it operating the previous day. The photographs now placed on record conclusively prove that the borewell at C2/45B is being illegally opened and been operated as on 05.04.2026, the Applicant has reliably learnt that the remaining borewells C2/45E and C2/110A also have been re-opened and are being illegally operated in blatant violation of the orders of this Hon'ble Tribunal and the groundwater extraction norms.
6. That the action of the owners/operators of the said borewells amounts to wilful and deliberate violation of the order dated 20.11.2024 passed in OA No. 1306/2024 as well as the directions issued in the present Execution Application. The repeated illegal re-opening of sealed borewells also constitutes contempt of the orders of this Hon'ble Tribunal.

7. That the Applicant has a strong prima facie case and will suffer irreparable harm if the illegal extraction of groundwater is not immediately stopped. The groundwater table in the area is already critically low and the continued illegal operation is causing serious environmental damage.

PRAYER

In view of the above facts and circumstances, it is most respectfully prayed that this Hon'ble Tribunal may graciously be pleased to:

- a. Direct Respondent Authorities to take immediate and permanent measures to dismantle the illegal borewell infrastructure;
- b. Direct Respondents to take action against the operators/owners of borewells as per law;
- c. Pass such other or further order(s) as this Hon'ble Tribunal may deem fit and proper in the interest of justice.

AND FOR THIS ACT OF KINDNESS THE APPLICANT IS AS DUTY BOUND, SHALL EVER PRAY



PLACE: NEW DELHI
DATE: 13.04.2026

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
EXECUTION APPLICATION NO. 74/2025
IN
ORIGINAL APPLICATION NO. 1306 OF 2024
(Under Section 25 of the National Green Tribunal Act, 2010)
(LEGAL AID CASE AIDED BY DELHI STATE LEGAL SERVICES**

AUTHORITY)

IN THE MATTER OF:

Ramesh Chand

...Applicant

Versus

Central Ground Water Authority & Ors.

...Respondents

AFFIDAVIT

I, Ramesh Chand, s/o Late Sh. Ranjeet Singh, aged about 52 years, r/o CII, 46, Block C - II, New Ashok Nagar, Delhi - 110091 do hereby solemnly affirm and declare as under:

1. That I am the Applicant in the present case and being conversant with the facts and circumstances of the present case, I am competent to swear upon the instant affidavit.
2. That the accompanying Reply/Objections have been drafted by my counsel upon my instructions and the contents thereof have been explicitly explained to me in vernacular language.
3. That the contents of the accompanying Reply/Objections are true and correct based on my knowledge and understanding, and the same are not being repeated herein to avoid repetition of facts and circumstances.



DEPONENT

VERIFICATION

10 APR 2026

Verified on this 10th day of April, 2026 that the contents of the above affidavit are true and correct as per my personal knowledge and the records maintained by me during normal course. Nothing material has been concealed therefrom.

5 shya
Identify the deponent who has signed
put thumb impression in my presence

10 APR 2026

रमेश चन्द
10/4/26
DEPONENT

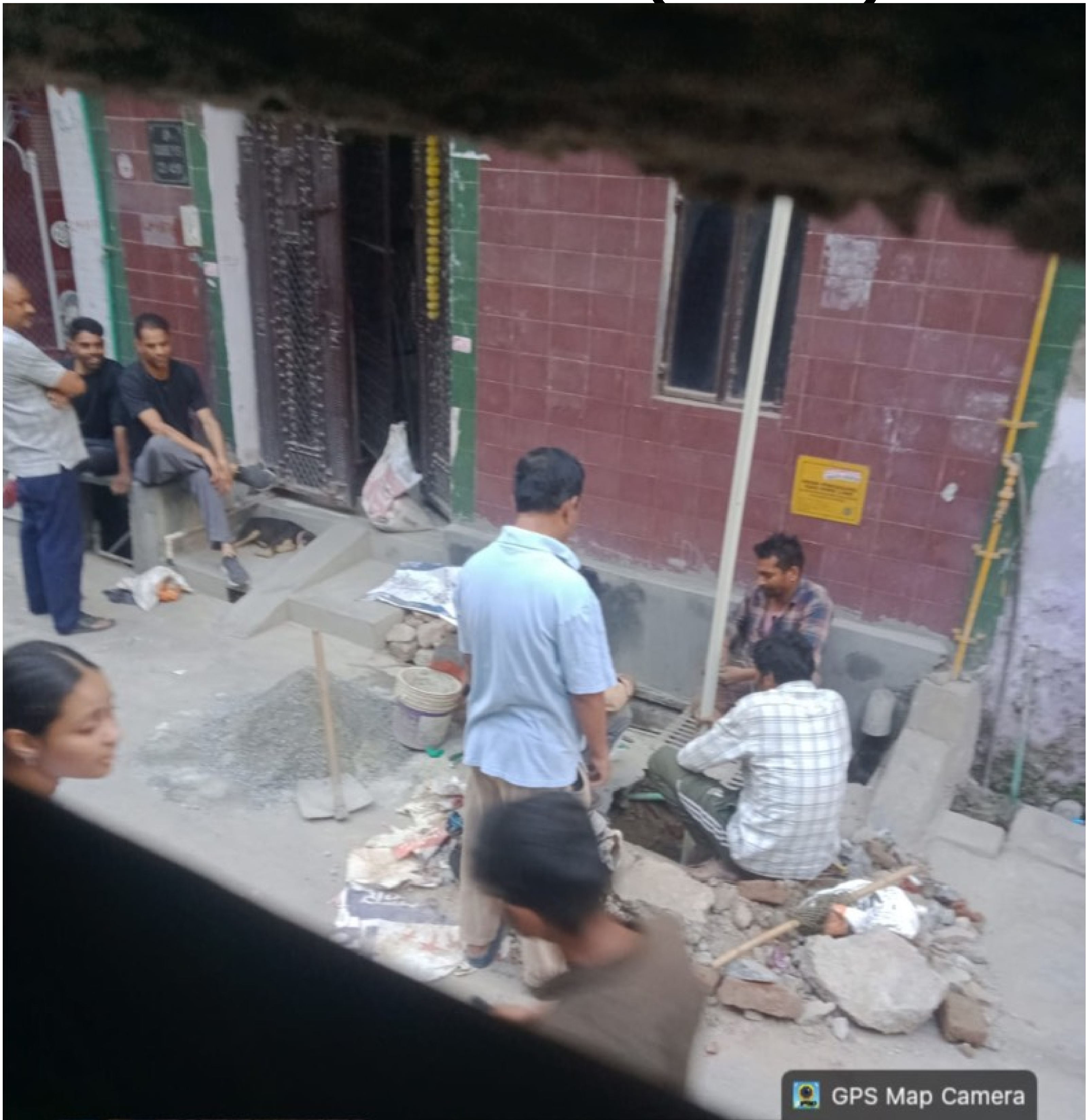


CERTIFIED THAT THE DEPONENT
Shri/Smt./K.M. *Ramesh Chand - 524*
S/o, W/o, D/o
R/o
Identified by Sh./Smt. *Ashid Mahajan*
has solemnly affirmed that
10 APR 2026 the contents of the affidavit
have been read over & explained to him/her
and correct to his/her knowledge
Sanjeev Ranjan
Oath Commissioner, Delhi

10 APR 2026

ANNEXURE¹-1 (COLLY)

7



 GPS Map Camera



Google


New Delhi, Delhi, India 

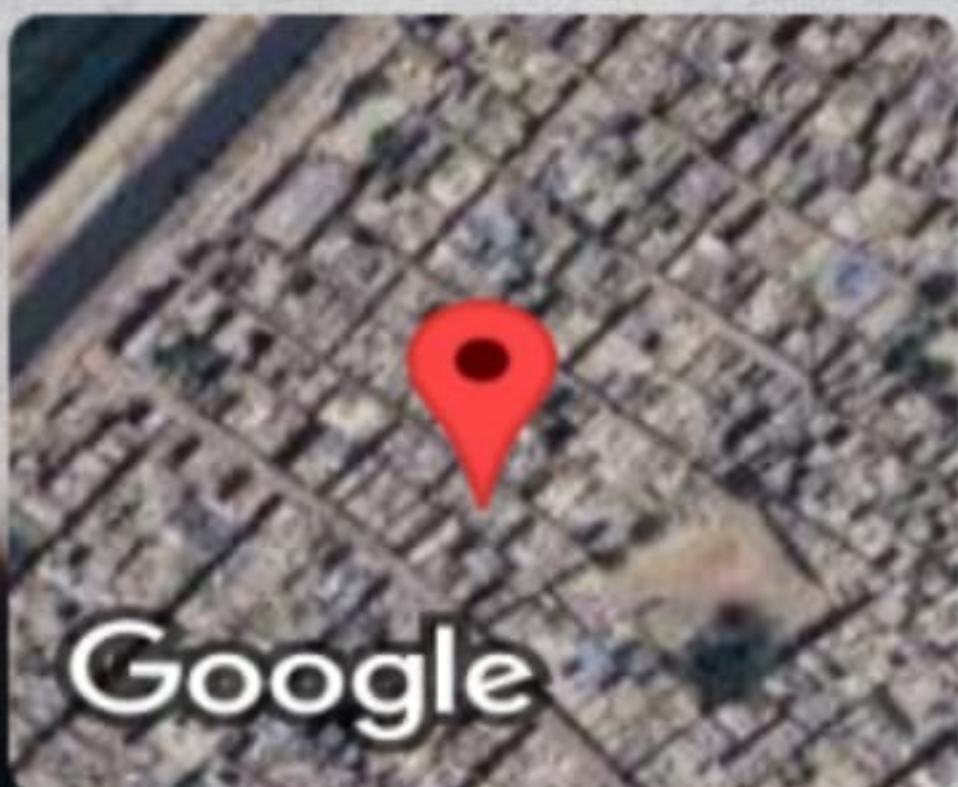
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Nagar, New Delhi, Delhi 110096, India


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 GPS Map Camera



New Delhi, Delhi, India 

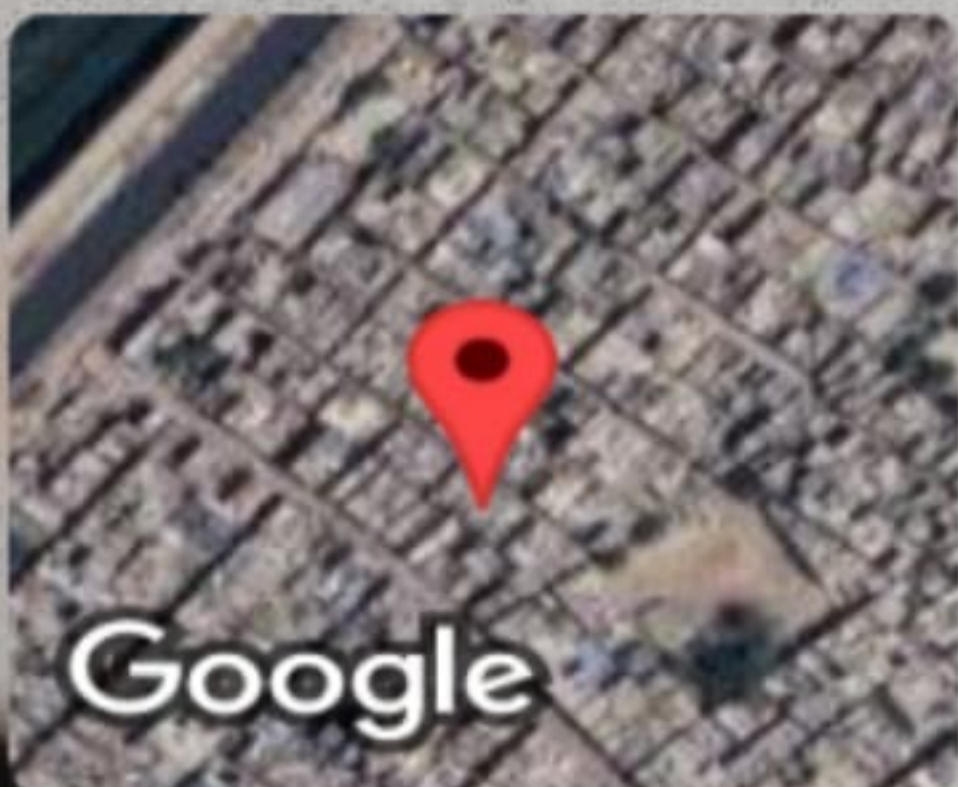
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Nagar, New Delhi, Delhi 110096, India

Lat 28.592953° Long 77.306033°

रविवार, 05/04/2026 06:05 PM GMT +05:30



GPS Map Camera



Google


New Delhi, Delhi, India 


C2/67a, Block C 2, Block C, New Ashok
Nagar, New Delhi, Delhi 110096, India

Lat 28.592908° Long 77.306003°

रविवार, 05/04/2026 06:06 PM GMT +05:30



 GPS Map Camera

Delhi, Delhi, India 

130, Gali No. 5, Opp. Durga Mata Mandir, Block C 2, Block C, New Ashok Nagar, Delhi, Delhi 110096, India

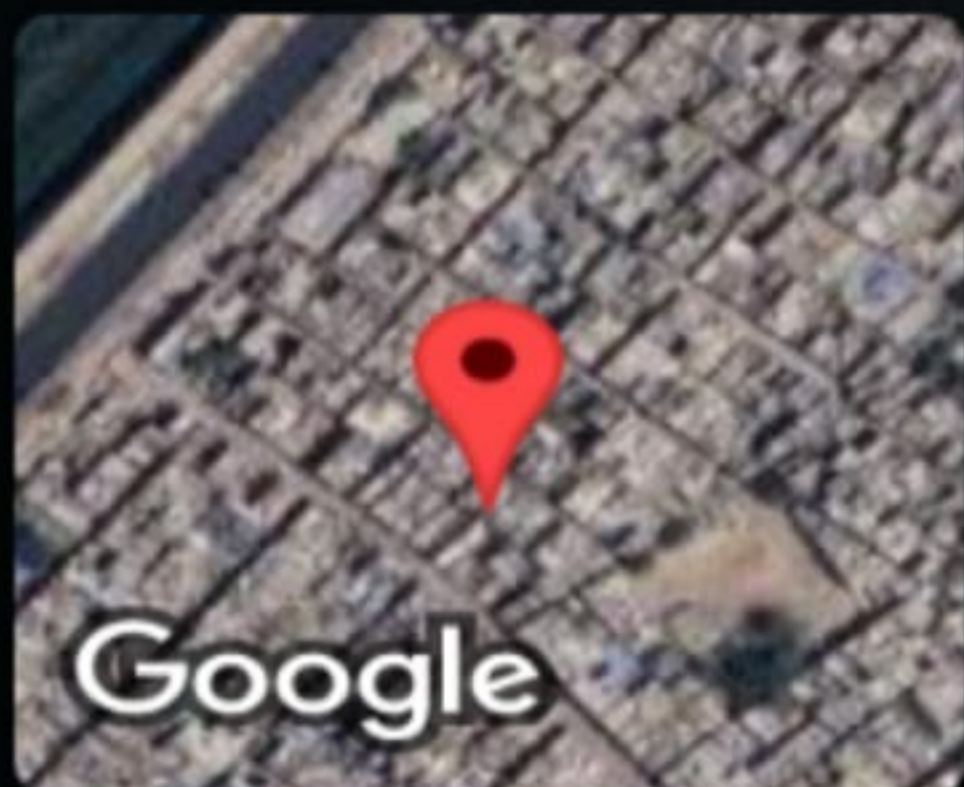
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GPS Map Camera



New Delhi, Delhi, India 


C2/66a, Block C 2, Block C, New Ashok
Nagar, New Delhi, Delhi 110096, India

Lat 28.592966° Long 77.305964°

रविवार, 05/04/2026 05:35 PM GMT +05:30



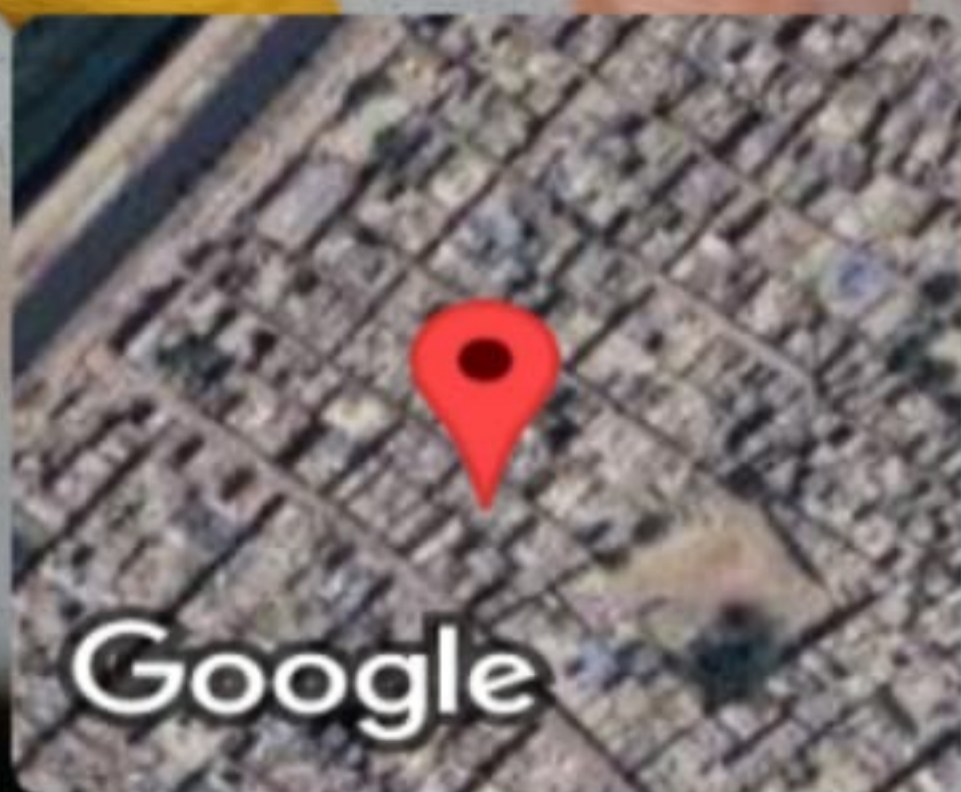
GPS Map Camera

New Delhi, Delhi, India 

C2/45c, Block C 2, Block C, New Ashok
Nagar, New Delhi, Delhi 110096, India

Lat 28.592953° Long 77.306033°

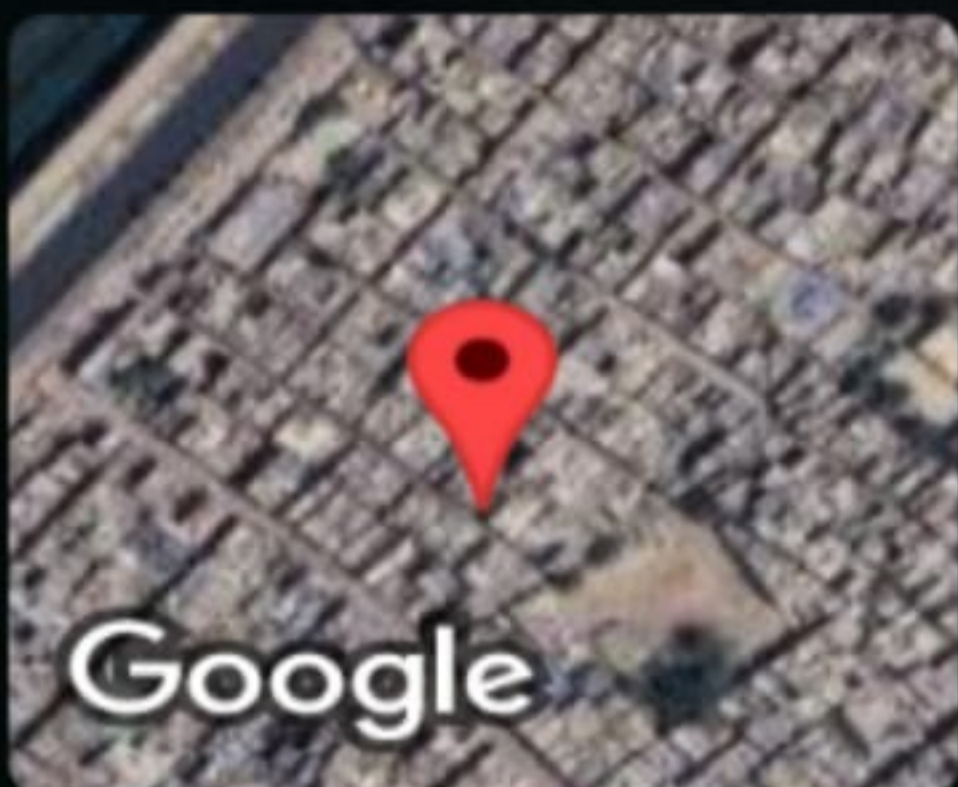
रविवार, 05/04/2026 06:05 PM GMT +05:30




Google



GPS Map Camera



New Delhi, Delhi, India 

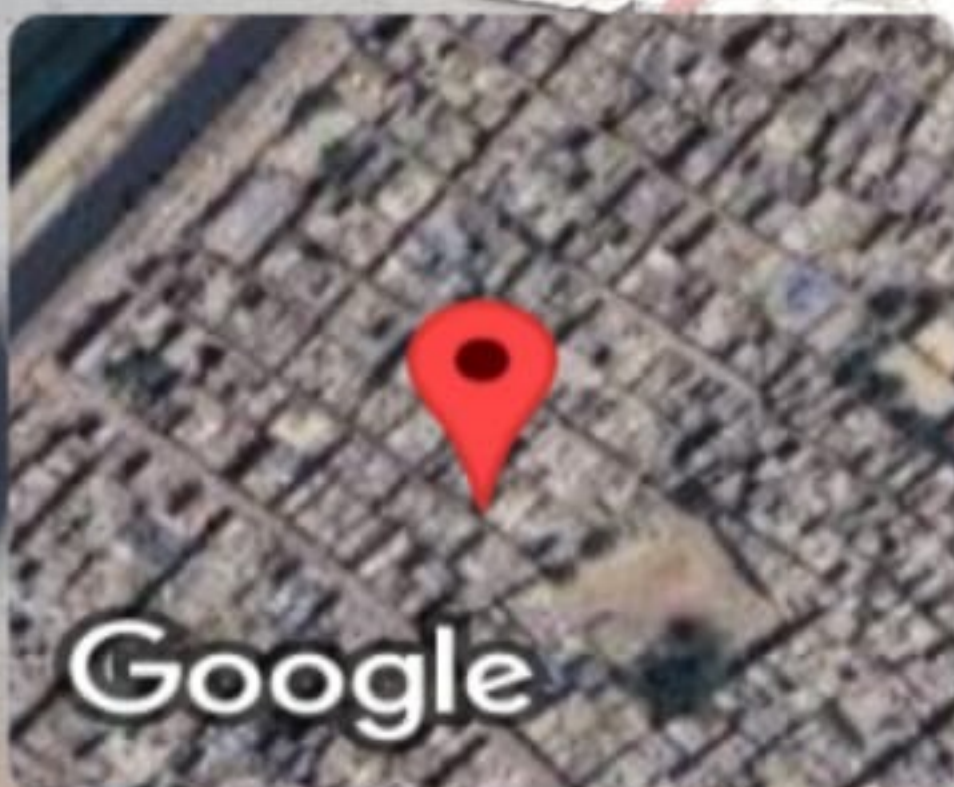
C2/45a, Block C 2, Block C, New Ashok
Nagar, New Delhi, Delhi 110096, India


Lat 28.593028° Long 77.306179°

रविवार, 05/04/2026 05:35 PM GMT +05:30



 GPS Map Camera




New Delhi, Delhi, India 

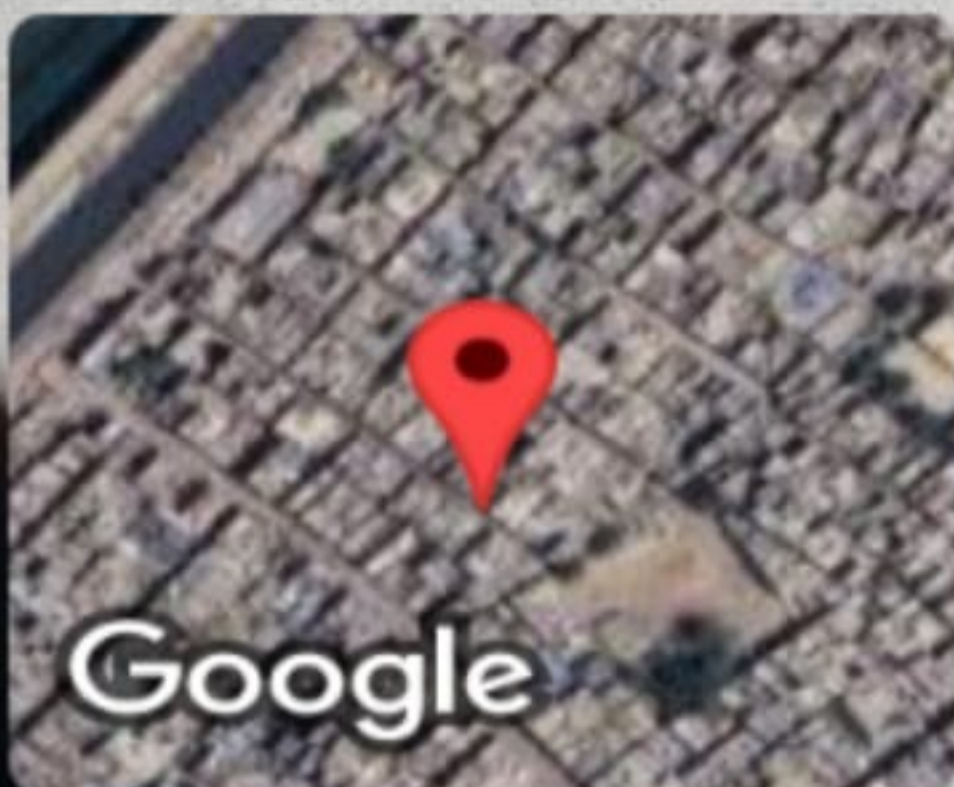
C2/45a, Block C 2, Block C, New Ashok
Nagar, New Delhi, Delhi 110096, India


Lat 28.593043° Long 77.306248°

रविवार, 05/04/2026 06:06 PM GMT +05:30



 GPS Map Camera



New Delhi, Delhi, India 

C2/45a, Block C 2, Block C, New Ashok
Nagar, New Delhi, Delhi 110096, India

Lat 28.592992° Long 77.306175°

रविवार, 05/04/2026 06:05 PM GMT +05:30

Reply in EA No. 74/2025 in OA No. 1306 of 2024

1 message

ankeeta codanda <ankeeta.codanda@gmail.com>

Mon, Apr 13, 2026 at 1:56 PM

To: megwa-egwb@nic.in, commissioner@mcd.nic.in, msrawat.dpcc@nic.in, delpolSERVICE@delhipolice.gov.in, dceast@nic.in, mayursdm@nic.in, csdelhi@nic.in, grievances-djb@delhi.gov.in

Sir/ Madam,

Please find attached Reply/Objections on behalf of the Applicant in the captioned matter, as and by way of advance service upon you.

Thank you.

Regards,

C. Ankeeta Appanna

Advocate on Record

Supreme Court of India

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**Ramesh chand reply ftf.pdf**

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