

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
Original Application No. 444 of 2023

IN THE MATTER OF:

Paryavaran Vikash Sangh

... Applicant

vs.

State of Haryana & Ors.

.. Respondents

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Place: New Delhi

Date: 04.07.2025

Filed By:-



Shilpa Chohan and Jitender Chaudhary
Advocates for the Respondent no.9

For

Juris Consult

Advocates and Legal Consultants

B-22, First Floor, Jangpura extension

New Delhi-110014

Ph: 98110494638

E-Mail: juris_consult@rediffmail.com

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OBJECTIONS TO THE ENQUIRY REPORT OF HARYANA WATER RESOURCES AUTHORITY/R-5 ON BEHALF OF RESPONDENT N0.09-NEO CENTRA

Most Respectfully showeth as under: -

1. The present objections on behalf of Respondent no.9-Neo Centra to the enquiry report of Haryana Water Resources Authority ("HWRA") dated 29.06.2025 be read in conjunction to the reply and additional reply to the Joint Committee Report on behalf of the R-9-Neo Centra and the contents of the same be read as part and parcel of the present reply and same are not being repeated for sake of brevity.

REPLY TO THE OBSERVATIONS AND CONCLUSIONS

2. That at the outset it is necessary to set out certain factual aspects as regards to the answering respondent that are relevant for the present objections.
3. The R-9 had 1st NOC for dewatering at the site which was valid from 27.01.2022 to 10.08.2022 and then renewal was granted and

Renewal NOC was valid from 10.02.2023 to 24.08.2023. The R-9 had submitted its application for renewal of the HWRA permission for dewatering on 22.09.2023. The R-9 has responded to queries and clarifications raised on the HWRA portal qua the renewal application. The dates and the response to the queries raised qua the renewal application would highlight that the queries were

S.No.	Observation Date	Reply Submission Date
1	14/05/2025	-
2	28/04/2025	28/04/2025
3	04/11/2024	25/04/2025
4	30/06/2024	04/10/2024
5	10/05/2024	11/06/2024
6	16/01/2024	24/04/2024
7	31/10/2023	08/01/2024

responded to as and when raised:-

The queries raised and their response would show that the some of the responses such as requirement of permission from GMDA for disposal of the dewatered water in the drain is pending with GMDA and the R-9 is not position to expedite the same. As of today, the GMDA permission is pending and the same is evident from the averments in the enquiry report (Page 768). R-9 has conveyed to HWRA that the GMDA permission has been applied for and is awaited. Besides, that all the queries have been responded to by R-9. It is submitted that as and when the queries were raised the same were responded to and at times, some technical inputs were required that took some time in submission. The true copy of the

point-wise reply of observations raised by HWRA on application for Groundwater Abstraction and its response is annexed herewith and marked as **Annexures A/1 (Colly)**.

4. The R-5/HWRA issued a notice for personal hearing on 28.04.2025 and in the enquiry report it is submitted that no one appeared from the side of R-9/Neo Centra (Page 770). It is submitted that Mr. Manish Bhola, AR and Mr. Hemant Warrik had appeared on behalf of R-9/Neo Centra before the Chairperson. At the time of personal hearing, additional reply to the show cause issued earlier was to be submitted which was not accepted by HWRA. During the time of personal hearing, certain clarifications and documents were sought qua the renewal application, which was uploaded the same day i.e. 28.04.2025. The R-9/Neo have been diligent in pursuing their renewal application.
5. The R-9 were shocked to receive on 02.05.2025, email from HWRA containing an order that stated that environment compensation is to be imposed and a direction was issued to the Tariff Committee, HWRA to compute the environment compensation. The R-9 is at a loss to understand the basis for this finding as there was no discussion at the time of personal hearing on the issue of environment compensation and neither any show cause has been issued before any such imposition. The R-9 were served through email dated 27.06.2025 an order dated 27.06.2025 passed by HWRA imposing Rs 44, 28,000/- as environment compensation (EC). The order imposing EC nowhere provides the basis for arriving at this

figure. The true copy of the order dated 27.06.2025 is annexed as **Annexure A/2**.

6. The HWRA has imposed an EC of ₹44,28,000 on R-9/Neo centra/Ocimum Estates Pvt. Ltd. without disclosing the specific statutory provision under which such a levy is authorized. HWRA has not issued a show cause before imposition of EC as the EC demand is based on a non-speaking order that fails to specify the computation of an amount of ₹44.28 lakh as EC. The order imposing EC has not taken into account that R-9 had valid NOC till 24.08.2023, continuous replies have been submitted for application for renewal, there is no use of groundwater for construction purposes and R-9 only uses treated water from GMDA, the multiple compliance responses to HWRA's queries from Oct 2023 to April, 2025 and that the NOC is pending for want of permission from GMDA which has been applied for but not yet granted by them. It is submitted that R-9 has diligently followed up on its renewal application for NOC.

Place: New Delhi

Date: 04.07.2025

Filed By:-

Shilpa Chohan and Jitender Chaudhary
Advocates for the Respondent no.9

For

Juris Consult

Advocates and Legal Consultants

B-22, First Floor, Jangpura extension

New Delhi-110014

Ph: 9810494638

E-Mail: juris_consult@rediffmail.com

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**Point-wise reply of observations raised by HWRA on application
for Groundwater Abstraction**

S.No.	Observations	Reply
1	At the top of application form, Previous NOC No. HWRA/NOC/INF/R/2023/10 is mentioned but wrong NOC is attached bearing No. HWRA/NOC/INF/N/2022/27. Pls attach correct NOC.	<ul style="list-style-type: none"> Correct NOC bearing no. HWRA/NOC/INF/R/2023/10 dated 10.02.2023 valid upto 24.08.2023 is uploaded in online application form.
2	Validity of Fresh NOC was from 27.01.2022 to 10.08.2022 (195 days) and Validity of Renewal NOC was from 10.02.2023 to 24.08.2023 (195 days). Whether dewatering is being continued after 24.08.2023, pls confirm.	<ul style="list-style-type: none"> No. After 24th August 2023, there was no further continuation of the dewatering process at the project site.
4	Two times NOCs have been issued with period of 195 days each and again renewal of NOC is sought for a period of 195 days. Pls clarify upto what period construction shall be tentatively completed.	<ul style="list-style-type: none"> Construction has not commenced at the project site. The construction activities will commence once the shallow groundwater, which is causing difficulties in the construction of the basement, has been effectively dewatered. The dewatering process will be initiated again after obtaining the necessary renewal.
5	As per WBC water requirement for residential, restaurant, food court etc has been shown but against the column of "Type of Infrastructure" is mentioned as office building which is wrong please clarify?	<ul style="list-style-type: none"> The infrastructure type for the project is an office building. Inadvertently a mistake was made in the water balance chart where the term "residential" was mentioned instead of "office." We have rectified this error and uploaded the revised water balance chart in the online application.
Wrong / Another / Missing Document Against		
6	Completion Certificate from concerned agency in the application form	<ul style="list-style-type: none"> Not Applicable. Project has not been completed as of now. An undertaking for the same is enclosed as Annexure-I and also uploaded in online application.
7	Occupation Certificate from concerned agency in the application form	<ul style="list-style-type: none"> Not Applicable. Project has not been completed as of now. An undertaking for the same is enclosed as Ref. Annexure-I and also uploaded in online application.
8	Attach Up-to-date valid CTE by HSPCB. Mention CTE No. & Date and its validity period in the application form	<ul style="list-style-type: none"> A CTE has been obtained from HSPCB vide letter no. HSPCB/Consent/:313116318GUNOCT E5697275 dated 15.10.2018 valid upto 19.08.2025. A copy of the same has been uploaded in the online application form and enclosed as Annexure-II.

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9	Approval letter/CLU of State Government Agency approving the infrastructure development	<ul style="list-style-type: none"> A copy of approval letter has been uploaded in online application and enclosed as Annexure- III.
10	Up-to-date valid Environment Clearance granted by the SEIAA (State Environment Impact Assessment Authority), if applicable	<ul style="list-style-type: none"> Environment Clearance has been obtained by SEIAA, Haryana vide. Letter no. SEIAA/HR/2020/284, Dated 17.07.2020 valid upto 16.07.2030. A copy of the same has been uploaded in online application and enclosed as Annexure- IV.
11	Have you applied for groundwater clearance permission earlier from Government Agency/CGWA, if so give details thereof with status. If not applied, attach a self-declaration signed by applicant that the applicant has not applied for abstraction of ground water to any other competent Authority/CGWA.	<ul style="list-style-type: none"> Not Applicable. An undertaking for the same is enclosed as Ref. Annexure-I and also uploaded in online application.
12	Affidavit for compliance of NOC not attested by Notary	<ul style="list-style-type: none"> Revised affidavit notarized and attested has been uploaded in the online application and also enclosed as Annexure-V.
13	Attach dewatering structure (be fitted with digital water flow meter) against 'Any Other Document'	<ul style="list-style-type: none"> Complied. Dewatering structure (be fitted with digital water flow meter) photograph has been uploaded against any other document in online application form.
14	Attach geotag photos of 2 piezometers and STP/ETP against 'Any Other Document'	<ul style="list-style-type: none"> A photograph of 2 piezometers has been uploaded against any other document in online application form. STP has not been installed yet at project site.
15	Telemetry data of 2 DWLRs on Piezometers is not being shared with HWRA through telemetry. Ask your telemetry provider to carry out API integration of telemetry of each with HWRA portal and share real time data with HWRA (Technical details for API integration are available in your login account on the HWRA portal which may be shared with your vendor for this purpose)	<ul style="list-style-type: none"> We are in the process to carry out API integration through our telemetry provider. Data will be shared at HWRA portal with due course of time.

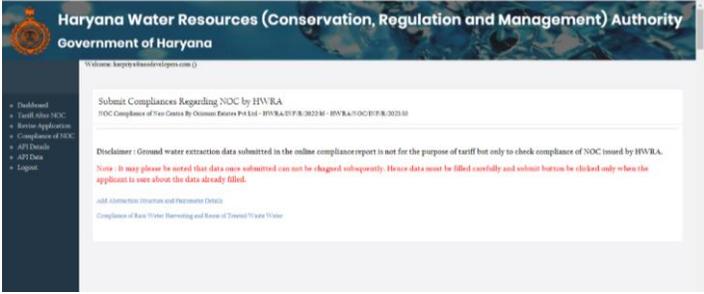
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**Point-wise reply of observations raised by HWRA on application
for Groundwater Abstraction**

S.No.	Observations	Reply
1.	Telemetry data of 2 DWLRs on Piezometers is not being shared with HWRA through telemetry. It is mandatory and only after its compliance, application shall be considered for grant of NOC/Permission.	<ul style="list-style-type: none"> Telemetry data of 2 DWLRs on Piezometers is linked with HWRA. Details are enclosed as Annexure-I.
2.	Table 1.9 Basic detail of district should be clear whether it is of Faridabad or Gurugram.	<ul style="list-style-type: none"> The project is Located in Revenue Estate of Village- Daultabad, Sector-103, Tehsil and District – Gurugram, Haryana. Details are updated in Table 1.9 of IAR.
3.	Table 1.10 data of rainfall should be latest instead of 2015	<ul style="list-style-type: none"> Latest rainfall data is mentioned in the Table 1.10 (a) & (b) of IAR.
4.	1.8.1 Drainage: Drainage map should be attached in IAR.	<ul style="list-style-type: none"> A copy of drainage map is enclosed in IAR and also enclosed herewith as Annexure- II.
5.	Depth to water level nearby the site should be authentic sources i.e. GWC, CGWB & WRIS etc.	<ul style="list-style-type: none"> Depth of water level at project site mentioned in the report has been measured by the Project Proponent through NABL accredited lab.
6.	Ground Water level given in table 2.5 & 3.1 are not matching each other	<ul style="list-style-type: none"> The groundwater levels in table 2.3 and 3.1 have been accurately updated.
7.	Groundwater Chemical Analysis report of table 2.3 Result & Conclusion shows E.C. 3523.0 $\mu\text{S}/\text{cm}$ whereas chemical analysis report attached in application form shows E.C. 563.5 $\mu\text{S}/\text{cm}$ which is not matching each other	<ul style="list-style-type: none"> The values of EC (Electrical Conductivity) mentioned in table 2.3 Result & Conclusion is 3523.0 $\mu\text{S}/\text{cm}$ is accurate. Updated test reports are enclosed as Annexure-III and updated in the online application form also.
8.	Recharging activities not possible as per the groundwater level shown in the IAR. Clarify how to recharge through RWHS in waterlogged area.	<ul style="list-style-type: none"> Inadvertently the rainwater harvesting pits are mentioned in the IAR. Considering the waterlogged nature of the area, the installation of Rainwater Harvesting Tanks have been proposed. These tanks will effectively address the waterlogging issue and promote efficient rainwater management.

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**Point-wise reply of observations raised by HWRA on application
for Dewatering Permission**

S.No.	Observations	Reply
1.	<p>Telemetry - Pls Check your Online Compliance Report which is clearly showing in red colour that Telemetry data of DWLR is not shared with HWRA.</p> <p>On the other hand, it is showing that Telemetry data of 2 abstraction structures is being shared with HWRA.</p> <p>It appears that applicant installed telemetry on abstraction structures and not on the DWLR of Piezometer.</p>	<ul style="list-style-type: none"> Telemetry data of 2 digital water flow meter is linked with HWRA. Geotag photos of Flow meters is enclosed as Annexure-I. We have installed 2 flow meters as per the Schedule III point no (i) of Notification. HWRA/485/Notification/2021 dated 10.09.2021. Further, as per the condition No. 3 of NOC obtained for dewatering from HWRA vide No-HWRA/NOC/INF/R/2023/10 dated 10.02.2023, piezometer is not applicable for our project as the NOC has been obtained for dewatering of 120 KLD only.
2.	<p>Online Compliance Report of HWRA NOC conditions – Please fill the details regarding Piezometer, DWLR and Telemetry installed on DWLR in the Compliance report through the link given in the respective column of Application Form. Fill all the four modules of Online Compliance Report. After final submission, take print of online Compliance Report and upload signed copy against the specified column in the Application Form.</p>	<ul style="list-style-type: none"> Compliance report of HWRA NOC is enclosed as Annexure-II and also uploaded in online application. We have obtained HWRA NOC for Dewatering not for the installation of abstraction structure. Further, No option is reflecting to fill the modules of compliance at HWRA website. 

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Pointwise reply of the observation raised by HWRA on application for the dewatering

S.No.	Query	Reply
1.	Location map of monitoring wells should be attached in IAR and selected min. 5 observation point in the buffer zone.	Location map of monitoring wells is given in Chapter-2; Figure-2.1 and also attached as Annexure-VII in the IAR.
2.	Ground Water level: Ground Water Level should be latest from authentic source i.e. WRIS, CGWB, GWC.	Ground Water Level is taken from Measurements conducted by a NABL-accredited laboratory.
3.	Toposheet map is not given in IAR.	Topographic Map of study area (within 5 Km) is given in Chapter-1; Figure 1.3 and also attached as an Annexure-III in the IAR.
4.	Quality map should be attached in IAR.	Water Quality maps are given in Chapter-2; Figure-2.3-2.5 and also attached as an Annexure-X in the IAR.
5.	Water level map should be attached in IAR.	Water level map is attached in the Geo-hydrological report as an Annexure-VI of IAR.
6.	Report is not as per format	Corrections has been made in the IAR as per the format.
7.	Change of water level in the premises w.r.t. earlier observations not given	Change of water level in the premises w.r.t. earlier observations is given in Chapter 2; Table 2.3.
8.	Change in GW quality with respect to last test report not given	Change in GW quality with respect to last test report is given Chapter 2; Section- 2.3
9.	The ground water quality report has been given in tabular form but test reports not attached	Previous Test reports of groundwater quality are attached as Annexure-VIII & Latest Test reports of groundwater quality are attached as IX of IAR.
10.	Permission to dispose of water in Najafgarh drain not given	In process. Will submit in due course of time.
11.	Environmental Impact due to disposal of saline water at disposal site not given	Not applicable. No saline water will be disposed off at site.
12.	Information in table 3.1 is not complete	Corrections has been done in table 3.1 of the IAR.
13.	Detailed computation assessment of de-watering quantity of 120 Kld not given	Detailed computation assessment of de-watering quantity is mentioned in the Chapter-3 of IAR.
14.	Table 3.1 at page No. 18 mismatches with table 3 on Page No. 33	Corrections has been made in the IAR.
15.	Accreditation certificate of the consultant from authorised authority is not given.	Accreditation certificate of the consultant from authorized authority is attached as an Annexure-XII of IAR.

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Pointwise reply of the observation raised by HWRA dated 04.11.2024 on application for the dewatering

S.No.	Query	Reply
1.	Digital signature / letter for preparation report by accredited consultant not given.	Digital signature / letter for preparation report by accredited consultant is attached as an <i>Annexure-I.</i>
2.	Figure 2.1 not clear. Provide clear map showing location of monitoring wells along with details in tabular format.	Map showing location of monitoring wells along with details in tabular format is attached as an <i>Annexure-II.</i> Also updated in IAR Report
3.	Reply of point No.2 not satisfactory related to Groundwater Level	Ground Water Level is taken from Measurements conducted by a NABL-accredited laboratory and piezometers are also installed at site. Comparative Groundwater level readings are mentioned in Table 2.3 of IAR report.
4.	Attached all maps in figures along-with relevant text	All the maps in figures along-with relevant text are attached in the IAR.
5.	Provide change in GW quality w.r.t earlier test reports in tabular format.	Change in GW quality with respect to last test report is given Chapter 2; Section- 2.3.
6.	Point No.10 not replied related to permission to dispose of water in Najafgarh drain.	We will dispose of the water in Najafgarh drain/lake in non-monsoon season only.
7.	Point No.11 not attended as ground water quality is saline.	There will be no Environmental Impact due to disposal of water in Najafgarh drain/Lake.
8.	Provide based on which 15 Klph will be sufficient for dewatering	<p><u>Detailed Computation of 15 Klph</u> Details of Pump- One (01) pump of 5 HP shall be installed.</p> <ul style="list-style-type: none"> • Extraction Quantity -15000 L/Hr. or 15 KL/Hr. • Total quantity of pumped out water is 120 m³/Day. • Operational time is 8 hrs per day and the flow rate is 15 KL/Hr is sufficient. <p><u>Utilization of pumped water</u></p> <ul style="list-style-type: none"> • Total quantity of pumped out water is 120 m³/Day. • 20 m³/Day of pumped water will be utilized in dust suppression. • 100 m³/Day of pumped water will be disposed of through private water tanker in Najafgarh drain which is at approx. 2.67 Km away from the project site in west direction.. <p>Detailed calculation are given in Chapter-3 Table 3.1 of IAR</p>

9.	Ground Water level: Ground Water Level should be latest from authentic source i.e. WRIS, CGWB, GWC. Provide latest pre and post monsoon depth to water table data along with maps of the project area.	<ul style="list-style-type: none">• Required details are enclosed as Annexure-III. Also enclosed as Annexure in IAR Report.
10.	Provide pre and post monsoon hydrograph of the project area for the last 10 years.	<ul style="list-style-type: none">• Hydrograph of the 10 yrs is explained in detail in Annexure-VI of IAR Report. Also attached with this reply as Annexure-IV. Interpretation of groundwater depth is done by MODFLOW simulation study.

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Pointwise reply of the observation raised by HWRA dated 28.04.2025 on application for the dewatering

Query 1: The permission for disposal of pumped water in Nazafgarh drain be provided from the competent authority.

Reply: Request letter to obtain NOC to dispose of the water in Najafgarh drain has been submitted to the irrigation department. Once the permission will be obtained we will submit the same to the HWRA department.

Query 2: Revised IAR is not as per prescribed IAR format.

Reply: Revised IAR as per prescribed IAR format is attached in the specified column of online application.

Annexures of IAR are attached as Part I & Part II in any other documents column.

Query 3: Justification for computation of 15 KLH of dewatering has not been provided. There is no table 3.1 as mentioned in applicant's reply.

Reply: Detailed Computation of 15 Klph

S. No.	Type of Structure / Year of Construction	Depth (Meter) /Diameter(m m)	Depth to water level (mbgl)	Discharge (m ³ /Hr)	Operational Hrs (Day)/ Days (Year)	Mode of Lift Name	Horse Power of Pump	Whether fitted with water meter	Whether permission registered with CGWA
1	Excavated Pit	6.5 m	3.5	15	8 Hrs /Day & 195 Days /Year	Centrifugal Pump	5	Yes	No

Details of Pump- One (01) pump of 5 HP shall be installed.

- Extraction Quantity -15000 L/Hr. or 15 KL/Hr.
- Total quantity of pumped out water is 120 m³/Day.
- **Operational time is 8 hrs per day and the flow rate is 15 KL/Hr is sufficient.**

Utilization of pumped water

- Total quantity of pumped out water is 120 m³/Day.
- 20 m³/Day of pumped water will be utilized in dust suppression.
- 100 m³/Day of pumped water will be disposed of through private water tanker in Najafgarh drain which is at approx. 2.67 Km away from the project site in west direction.

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Seepage								
Year	Period	Depth (m)	Perimeter of the Face (Sqm)	Saturated Thickness (m)	GW Gradient	Hydraulic Conductivity (m/day)	Per Day Seepage (m ³ /Day)	Hourly Seepage (m ³ /Hr)
1st	Pre-monsoon	6.5 (BGL)	3068	4	0.01	0.5	61.36	1472.64
	Post-monsoon	6.5 (BGL)		5.5	0.01	0.6	101.24	2429.86
Bottom Seepage								
Year	Hydraulic Conductivity (m/day)		Bottom Area (m ²)	GW Gradient		Per Day Seepage (m ³ /Day)	Annual Seepage (m ³ /yr)	
1st	0.5		3068	0.01		15.34	5599.1	
Rainfall Contribution								
Year	Rainfall (m)	Runoff Factor		Area (Sqm)	Per Day Runoff (m ³ /Day)		Annual Runoff (m ³ /yr)	
1st	1.05	0.7		3068	6.18		2254.98	
Year	Face Seepage (m ³ /day)	Bottom Seepage (m ³ /day)		Runoff (m ³ /day)		Total Quantum (m ³ /day)	Total Quantum (m ³ /Hr)	
1st	101.24	15.34		6.18		122.76	15.34	

Calculation is based on geological feature present in that area. The study area Gurugram is largely occupied by alluvial plains, traversed by elongated ridges of Delhi quartzites.

The calculations are also mentioned in Table 3.1 (a) & (b) in Chapter-3 of IAR report

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The Haryana Water Resources
(Conservation, Regulation and
Management) Authority,
Panchkula



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ANNEXURE A/2

हरियाणा जल संसाधन
(संरक्षण, विनियमन और
प्रबंधन) प्राधिकरण, पंचकूला।

From

The Chairperson
Haryana Water Resource Authority,
Rear Building of HSVP, 3rd Floor,
Sector-6, Panchkula.
Phone No.0172-2992114

To

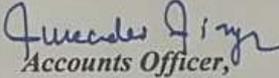
M/s Neo Centra By Ocimum Estates Pvt Ltd.,
1205, 12th Floor, Tower-B, Signature Towers
Gurugram Haryana-122001
Ph- 09910422299, 0124-4066000
Email- cs@neodevelopers.com, sales@neocentra.in

No. HWRA/Tariff/2025/2317
Dated :27/06/2025

Subject: Environment Compensation.

Kindly refer to Haryana Water Resources Authority order dated 28.04.2025 (copy enclosed). The Notification about Environment Compensation dated 17.03.2022 is also attached.

You are therefore directed to make the payment of **Rs.44,28,000/- (Rupees Forty Four Lakh Twenty Eight Thousand Only)** towards Environment Compensation through your login account on web portal of the Authority i.e. www.hwra.org.in on which it is being reflected. In case of failure to do so coercive action should be initiated against you.


Accounts Officer,
for Chairperson, HWRA
Panchkula.

CC:

1. The PS to W/Chairperson for her kind information please.
2. The IT-Cell, for to do the needful at the earliest.

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