

# 162

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 25 OF 2020

**IN THE MATTER OF:**

VIKRANT TONGAD

...APPLICANT

VERSUS

UNION OF INDIA AND ORS.

...RESPONDENTS

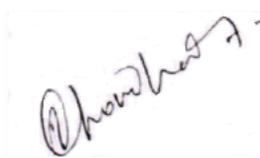
**INDEX**

<b>S. No.</b>	<b>Particulars</b>	<b>Page No.</b>
	Rejoinder to Reply of Respondent No.4 dated 03.09.2025 on behalf of the Applicant	1-4
	proof of service	5

**Through**



**RITWICK DUTTA**



**RAHUL CHOUDHARY**



**SHREEPURNA DASGUPTA**

**ADVOCATES**

COUNSEL FOR THE APPLICANT

N-73, Lower Ground Floor, Greater Kailash-1,

New Delhi-110048

Email id:- [Litigation@dclawchambers.com](mailto:Litigation@dclawchambers.com)

Place:- Delhi

Dated:- 01.12.2025

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
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**REJOINDER TO REPLY OF RESPONDENT NO. 4 DATED 3.09.2025 ON  
BEHALF OF THE APPLICANT**

**MOST RESPECTFULLY SHOWETH:**

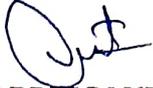
1. That the Applicant had filed the above-titled Original Application with the concern that the Noida Golf Course was extracting ground water illegally without NOC from CGWA for nondrinking purposes in 'over-exploited' region and in violation of guidelines laid down by the CGWA in the year 2015.
2. That the Respondent No. 4- Uttar Pradesh Pollution Control Board filed its Reply dated 3.09.2025. The Applicant through this present Rejoinder seeks to file its reply and objections to the contentions made by Respondent No. 4. At the outset, the Applicant denies all the contentions and averments made in the above-mentioned Reply dated 3.09.2025 unless expressly admitted or are a part of matter of record.

**REJOINDER TO REPLY BY RESPONDENT NO. 4 DATED 3.09.2025:**

3. That the Respondent No. 4 has made specific averments in Para 11-13 with respect to the M/s NOIDA Golf Course (hereinafter referred to as 'Project Proponent') wherein in site visit by the authority on 12.08.2025, it was observed as following:
  - a. The Project Proponent does not have any pump for extraction of ground water.
  - b. There are six rainwater harvesting pits and eight rainwater harvesting pits are under construction.

- c. The effluent generated in Golf Course is sent for treatment to Terminal STP of NOIDA Authority installed in Sector 50.
  - d. Two DG Sets of 320 KVA each have been installed.
  - e. The interim compensation of Rs. 25,00,000 had been paid on 22.07.2020
  - f. Response sent by the Project Proponent to the Respondent No. 4 vide letter dated 22.08.2025 (Pg 131) states that the NOIDA Golf Course is using only STP water and no ground water extraction done from the last several years.
4. That the Applicant submits that on a brief perusal of the Reply mentioned above, it can be clearly observed that the Respondent No. 4 has made their observations in reiteration of the letter written by the Project Proponent dated 22.08.2025 as mentioned above, and no proper verification has been undertaken by the Respondent No. 4.
  5. That the Applicant further submits that although no borewell is in function as claimed by the Respondent No. 4, details regarding the STP treated water has not been mentioned. There has been no query by the authority with respect to the verification of the STP treated water supply from the NOIDA authority. Further, there are no details regarding installation of any flow meter to determine the water usage, and the bills generated by the NOIDA authority.
  6. That it is also submitted that the NOIDA Golf Course is a popular spot for hosting weddings, parties, etc. For those purposes, it is not clear as to from where the water supply is being given to the Project Proponent.
  7. That the UPPCB has failed to ascertain environment compensation for the years of groundwater extraction prior to the filing of the above-titled Original Application and prior to sealing of the borewells in 2020.
  8. That therefore, this Hon'ble Tribunal may consider the above-mentioned submissions on behalf of the Applicant for further adjudication of the matter.

9. Pass any other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the instant case.

  
APPLICANT

THROUGH







**Ritwick Dutta Rahul Choudhary Shreepurna Dasgupta**

**ADVOCATES**

COUNSELS FOR THE APPLICANT

N-73, LOWER GROUND FLOOR,

GREATER KAILASH-I,

NEW DELHI-110048

MOBILE NO: 9312407881

Email: litigation@dclawchambers.com

**Place: New Delhi**

**Date: 29.11.2025**

**VERIFICATION:**

Verified by Vikrant Tongad, s/o Baljeet Singh, aged about 35 years, R/o Plot No. 431, Bhanota, Greater Noida, U.P.- 201311 that the contents of Paragraphs 1 to 9 are true to my personal knowledge and nothing material has been concealed therefrom.

  
APPLICANT

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**AFFIDAVIT**

I, Vikrant Tongad, s/o Baljeet Singh, aged about 35 years, R/o Plot No. 431, Bhanota, Greater Noida, U.P.- 201311, do hereby solemnly affirm and declare as under:

- That I am the Applicant in the above titled Original Application and conversant with the facts and circumstances of the case and competent to swear this affidavit.
- That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.

  
DEPONENT

**VERIFICATION**

Verified on this 22 day of Nov., 2025 that the contents of the present affidavit are true and correct to my knowledge and belief and nothing material has been concealed therefrom.

  
DEPONENT



**ATTESTED**  
  
Dharampaul Singh  
Notary Advocate  
Reg. No. 2317  
Dist. Gautam Budh Nagar



167

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Litigation . &lt;litigation@dclawchambers.com&gt;

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**Rejoinder on behalf of the Applicant in OA No. 25 of 2020 Vikrant Tongad Versus. Union of India & ors.**

1 message

**Litigation .** <litigation@dclawchambers.com>

Mon, Dec 1, 2025 at 1:00 PM

To: daleepdhayani@yahoo.co.in, Vishnu Sharma &lt;sharmavishnu0818@gmail.com&gt;, "noida@noidaauthorityonline.com" &lt;noida@noidaauthorityonline.com&gt;, pradeepmisra@yahoo.com

Dear Sir/madam,

Please find attached-Rejoinder on behalf of the Applicant in OA No. 25 of 2020 Vikrant Tongad Versus. Union of India &amp; ors.

Thanks & Regards  
Counsel for the Applicant

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**2 attachments** **Rejoinder to counter R-7 on behalf fo the Applicant.pdf**

1383K

 **Rejoinder to reply R-4 on behalf of the Applicant.pdf**

1091K