

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

EA No. 01 of 2025

IN

O.A No. 602 of 2024

In the matter of:

Rajesh Sharma

...Applicant

Versus

State of Haryana and Others

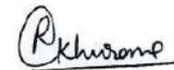
...Respondents

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Filed By:

Date: 30.04.2025



Rahul Khurana, Advocate
Counsel for Respondent No. 3
09811894060
rkhuranalegal@gmail.com

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

EA No. 01 of 2025

IN

O.A No. 602 of 2024

In the matter of:

Rajesh Sharma

...Applicant

Versus

State of Haryana and Others

...Respondents

**Reply by way of Affidavit of Yogesh Kumar, Under
Secretary, Haryana Water Resources Authority on
behalf of Respondent no 3.**

I, Yogesh Kumar, Under Secretary, Haryana Water Resources Authority, do hereby solemnly affirm and states as under:-

1. That the above titled Original Application is pending for adjudication before this Hon'ble Tribunal and is fixed for 23.04.2025.
2. At the very outset, it is most respectfully submitted that the above titled O.A. was listed for hearing on 27.05.2024 wherein this Hon'ble Bench was pleased to direct the answering respondent to take appropriate action on the complaint of the applicant and submit a report. The operative part of the order dated 27.05.2024 is reproduced below for kind perusal of this Hon'ble Bench:

4. Relating to the allegation of illegal extraction of ground water, it has been pointed out by the learned counsel for the applicant that the complaint dated 02.04.2024 was sent to the competent authority of Respondent No. 3 but on that complaint also no action has been taken. We are of the view that complaint of the applicant requires consideration by competent authority

Yogesh Kumar



Respondent No. 3 by following the principle of natural justice. Hence, we also direct the Respondent No. 3 to take appropriate action on the complaint of the applicant and submit a separate action taken report before the Registrar General of the Tribunal within two months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF.

It is most respectfully submitted that answering respondent was not represented while disposal of the O.A. and passing of the order under execution. However, after receiving information of present proceedings, necessary directions were issued to the Deputy Commissioner, Gurugram to conduct the enquiry into the matter and submit a report thereof. In this regard, the deponent hereby wishes to submit that the matter has been enquired into through Enforcement Officer, Gurugram and as per the report dated 24.04.2025 of Enforcement/Inquiry Officer, during inspection of the site of "Shri Sheetla Mata Devi Medical College and Hospital" on 24.04.2025, it has been found that it has been constructed by NKG Infrastructure Limited which is a client of GMDA, Gurugram and further, during inspection 2nos underground water storage tanks were found which are being used for storage of water received through tanker from GMDA-STP Dhanwapur. It is also relevant to submit here that during the site visit, an undertaking was also obtained from the representative of NKG Infrastructure Limited that no borewell is present at the site. Further, the final report dated 30.04.2025 from the Enforcement Officer also confirmed this position that no borewell is present on the site in question. The copy of the reports received from Enforcement Officer is appended as **Annexure R-3/1(Colly)**.



Padam Singh
Advocate
Panchkula (INDIA)

Y. Singh

2. That it is most humbly submitted that the project in question was not found involved in illegal extraction of groundwater through borewell.
3. In the light of the submission made by the deponent herein above, it is humbly prayed to this Hon'ble Tribunal that present Application filed by the Applicant is liable to be dismissed qua the answering respondent.
4. That the answering respondent craves leave of this Hon'ble Tribunal to file a file a further affidavit(s) if the situation so warrants or this Hon'ble Bench so directs.

Place:

Dated:

30 APR 2025


Deponent

VERIFICATION:

Verified that the contents of Para No. 1 to 4 of the above affidavit are true and correct to my knowledge and belief and based upon the information derived from official record, which I believe to, be true and correct. No part of it is false and nothing has been concealed therein.

Place:

Dated:




Deponent

30 APR 2025

ATTESTED

PADAM SINGH
NOTARY PUBLIC,
PANCHKULA

NOTARY
D-2



सिंचाई एवं जल संसाधन विभाग
हरियाणा

पी. डब्ल्यू. सिंचाई एवं जल संसाधन विभाग, हरियाणा
P.W. IRRIGATION & WATER RESOURCES DEPARTMENT, HARYANA
कार्यालय / Office of the कार्यकारी अभियन्ता, गुरुग्राम जल आपूर्ति मंडल, नहर कालोनी, महरोली रोड, गुरुग्राम
Executive Engineer, Gurugram Water Supply Division, Canal Colony, Mehrauli Road, Gurugram-122001
दूरभाष / Phone No. : 0124-2327801, Email - xen-gwsgrg.irr@gov.in & xengwsgrg@yahoo.in

No. 658-59 / 12w

Dated 30/04/2025

To

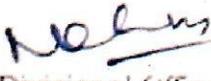
The Chairperson,
HWRA,
Panchkula.

**Subject: Execution application No. 01 of 2025 titled as
Rajesh Sharma V/s State of Haryana & Ors.**

**Ref: Your office Memo No. 611/HWRA dated 17.02.2025 and
memo No.1556/HWRA dated 23.04.2025.**

In continuation of this office letter No. 641-42/12W dated 24.04.2025, it is further submitted that during the inspection of site of Shree Sheetla Mata medical collage & hospital on dated 24.04.2025, **No borewell was found existing at site either in functional condition or in abandon condition.**

This is for your kind information and necessary action please.


Sub Divisional Officer,
GWS Sub Division No. 14,
Gurugram.


Executive Engineer,
GWS Division,
Gurugram

CC:

Worthy Deputy Commissioner, Gurugram w.r.t his letter No.48/LB dated 24.04.2025 for information and further necessary action please.



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उपायुक्त कार्यालय, गुरुग्राम

Office of DEPUTY COMMISSIONER, GURUGRAM

Office: Mini Secretariat, Gurugram- Phone - 0124-2321144 Fax No. 0124-2325500

E-mail dcgrg@hry.nic.in ctmgrg@hry.nic.in

सेवा में,

The Chairperson,
Haryana Water Resources Authority,
Sector-06, Panchkula.

क्रमांक ०१ / एल.बी.

दिनांक २५-०५-२०२५

विषय: **Execution Application No. 01 of 2025 titled as Rajesh Sharma Vs. State of Haryana & Ors.**

उपरोक्त विषय पर आपके कार्यालय के पत्र क्रमांक 611/HWRA dated 17.02.2025 व पत्र क्रमांक 1556/HWRA dated 23.04.2025 के संदर्भ में।

विषयाधीन मामले में आपके उपरोक्त संदर्भित पत्र के सम्बन्ध में कार्यकारी अभियन्ता, सिचाई एवं जल संसाधन विभाग, गुरुग्राम कार्यालय के पत्र क्रमांक 641-42/12W दिनांक 24.04.2025 द्वारा रिपोर्ट इस कार्यालय में प्राप्त हुई है। जिसकी प्रति अनुलग्नकों सहित आपकी सेवा में आगामी आवश्यक कार्यवाही हेतु प्रेषित है।
संलग्न-उक्त।

कृते: उपायुक्त, गुरुग्राम।

२५-०५-२०२५

No. 641-42/12WDated 24-4-25

To,

The Chairperson,
Haryana Water Resources Authority,
Sector-06, Panchkula

Subject: Execution Application No. 01 of 2025 titled as Rajesh Sharma Vs. State of Haryana & Ors.

Reference: Your Office Memo No. 611/HWRA dated 17.02.2025 and memo no. 1556/HWRA dated 23.04.2025

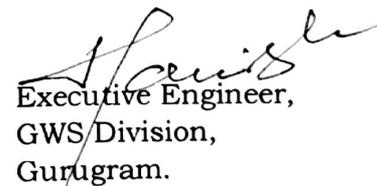
In connection to the above mentioned subject and letter under reference, the undersigned alongwith SDO, GWS Sub-Division No. 14, Gurugram, inspected the site of "Shree Sheetla Mata Devi Medical College & Hospital" constructed by 'NKG Infrastructure Limited' which is a client of GMDA, Gurugram on dated 24.04.2025 at around 11:40AM. During our inspection we found 2nos. underground water storage tank being used for storage of water procured through water tanker from GMDA - STP Dhanwapur. Undertaking regarding non-existence of borewell at site has been submitted by representative of 'NKG Infrastructure Limited'.

Submitted for your kind information and further necessary action please.

- DA/
1. Inspection Performa
 2. Undertaking
 3. Water Procurement Bills
 4. Site Photographs



Sub Divisional Officer,
GWS Sub Division No. 14,
Gurugram.



Executive Engineer,
GWS Division,
Gurugram.

CC:

1. Worthy Deputy Commissioner, Gurugram, Haryana (dcgrgl@hry.nic.in); for kind information please. *in reference to your office letter no. 48/LB. dated 24.04.2025.*

Format for inquiry report by Enforcement/Inquiry Officer:

I/We, the undersigned inquiry officer(s) conducted the inspection of
Sheetla Mata Medical College & Hospital (Company Name) on
 dated 24/04/25 at 11:40 AM (Time) in the presence of

Mr. Anilkumar Verma (GM.) (representative of the company)
 Mob:- 9910419497

In the subject matter of "Execution Application No. 01 of 2025 filed as
Rajesh Sharma vs. State of Haryana & Ors.

I/We make the following report: -

On the inspection/preliminary inspection I/We found the company/project
is not in violation of the provision of the Act and
 guidelines made thereunder, and the said company/project who was found drawing
 water illegally without any permission the details of the water extraction structure/s are
 as under:-

1. Number of water extraction structure: —
2. Type of water extraction structure: —
3. Discharge and diameter of water extraction structure : — (m³/hour) — (mm)
4. Duration of operation water extraction structure: — (Hours per day)

Enclosures: Photograph

[Signature]
 Signature of the Officer/s

Sub-Divisional Officer
 G.W.S. Sub Division No. 14
 Gurugram

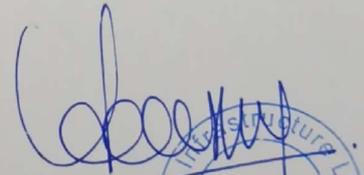
[Signature]



Undertaking

We M/s NKG Infrastructure Limited at Shree Sheetla Mata Devi Medical College & Hospital at Kherki Majra Sec-102A Gurugram (Haryana) hereby states the following:-

- 1) That there is no borewell for underground water uses in the premises of above stated address.
- 2) That the water requirement is fulfilled through GMDA STP Recycled water.
- 3) That last six months water bills are enclosed
- 4) That the above information provided by us is true and correct as per my knowledge .


Auth. Sign with Stamp


NKG Infrastructure Limited

(An ISO 9001 : 2008, ISO 14001 : 2004 and OHSAS 18001 : 2007 Certified Company)

Regd. & Corp. Office : 204, Kailash Building, 26, K.G. Marg, New Delhi - 110 001

Tel. : +91-11-47682800 Fax : +91-11-47682801 Email : nkg@nkginfra.com url : www.nkginfra.com

CIN-U74899DL1989PLC038371

Gurugram Metropolitan Development Authority

A Statutory Authority Under GMDA Act 2017

Show below QR Code to the operator. Do not share this with anyone else.



Or

Transaction Id : GMDABWT125331745298294655

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Tue, 22 Apr 2025

Valid Till - Sat, 26 Apr 2025

File Id - BWT-1745298129395

Name - NKG Infrastructure Limited

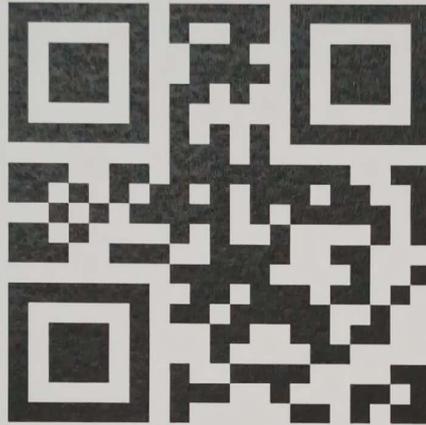
Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

A Statutory Authority Under GMDA Act 2017

Show below QR Code to the operator. Do not share this with anyone else.



Or

Transaction Id : GMDABWT679831744431447076

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Sat, 12 Apr 2025

Valid Till - Wed, 16 Apr 2025

File Id - BWT-1744431341933

Name - NKG Infrastructure Limited

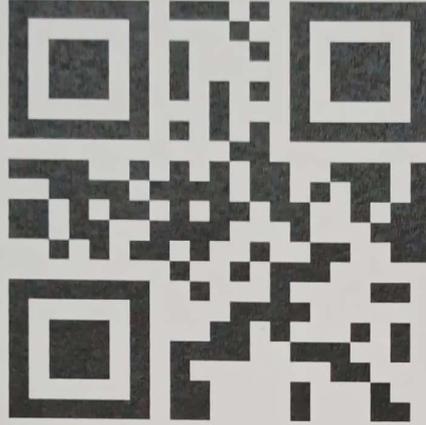
Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

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Or

Transaction Id : GMDABWT19511742962055765

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Wed, 26 Mar 2025

Valid Till - Sun, 30 Mar 2025

File Id - BWT-1742961980713

Name - NKG Infrastructure Limited

Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram



Gurugram Metropolitan Development Authority

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Or

Transaction Id : GMDABWT392321742444122398

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Thu, 20 Mar 2025

Valid Till - Mon, 24 Mar 2025

File Id - BWT-1742444034445

Name - NKG Infrastructure Limited

Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

A Statutory Authority Under GMDA Act 2017

Show below QR Code to the operator. Do not share this with anyone else.



Or

Transaction Id : GMDABWT323811741579799201

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Mon, 10 Mar 2025

Valid Till - Fri, 14 Mar 2025

File Id - BWT-1741579627519

Name - NKG Infrastructure Limited

Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

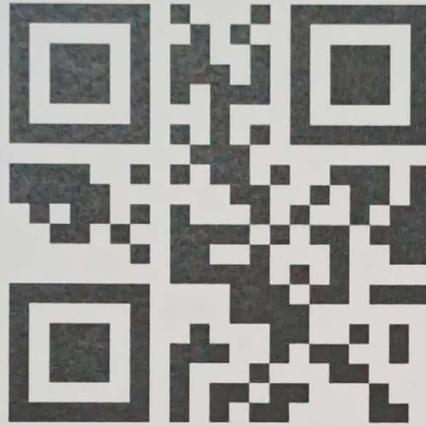
Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram



Gurugram Metropolitan Development Authority

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Show below QR Code to the operator. Do not share this with anyone else.



Or

Transaction Id : GMDABWT185001739245931496

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Tue, 11 Feb 2025

Valid Till - Sat, 15 Feb 2025

File Id - BWT-1739245847675

Name - NKG Infrastructure Limited

Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

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Show below QR Code to the operator. Do not share this with anyone else.



Or

Transaction Id : GMDABWT867191738727871918

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Wed, 5 Feb 2025

Valid Till - Sun, 9 Feb 2025

File Id - BWT-1738727779152

Name - NKG Infrastructure Limited

Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at

Majra Sec - 102A Gurugram



Gurugram Metropolitan Development Authority

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Or

Transaction Id : GMDABWT848851737974269786

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Mon, 27 Jan 2025

Valid Till - Fri, 31 Jan 2025

File Id - BWT-1737974162094

Name - NKG Infrastructure Limited

Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

A Statutory Authority Under GMDA Act 2017

Show below QR Code to the operator. Do not share this with anyone else.



Or

Transaction Id : GMDABWT878351735875706439

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Fri, 3 Jan 2025

Valid Till - Tue, 7 Jan 2025

File Id - BWT-1735875591542

Name - NKG Infrastructure Limited

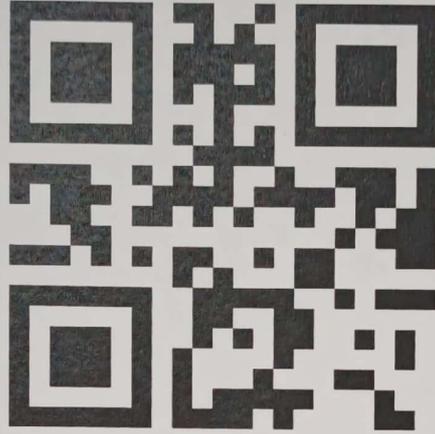
Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

A Statutory Authority Under GMDA Act 2017

Show below QR Code to the operator. Do not share this with anyone else.



Or

Transaction Id : GMDABWT362291735100135106

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Wed, 25 Dec 2024

Valid Till - Sun, 29 Dec 2024

File Id - BWT-1735100035969

Name - NKG Infrastructure Limited

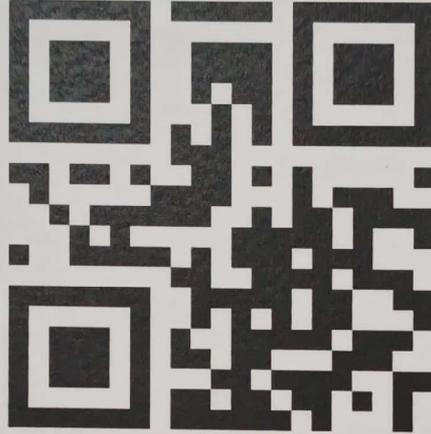
Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

A Statutory Authority Under GMDA Act 2017

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Or

Transaction Id : GMDABWT765071734171468026

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Sat, 14 Dec 2024

Valid Till - Wed, 18 Dec 2024

File Id - BWT-1734171249977

Name - NKG Infrastructure Limited

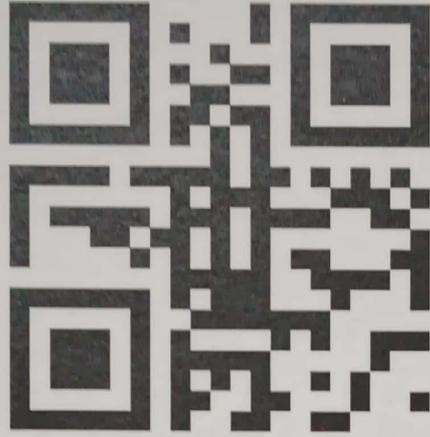
Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

A Statutory Authority Under GMDA Act 2017

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Or

Transaction Id : GMDABWT950941731900893477

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Mon, 18 Nov 2024

Valid Till - Fri, 22 Nov 2024

File Id - BWT-1731900616966

Name - NKG Infrastructure Limited

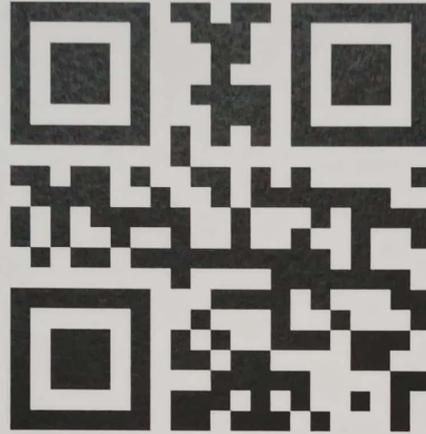
Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram

Gurugram Metropolitan Development Authority

A Statutory Authority Under GMDA Act 2017

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Or

Transaction Id : GMDABWT346401731557612810

Tanker size: Upto 15000 Ltrs. Charges: Rs. 450/-

Withdrawal slip 1 of 1

Vehicle Registration No. - HR47D8707

Type - Recycle Water

Water Station - STP Dhanwapur

Valid From - Thu, 14 Nov 2024

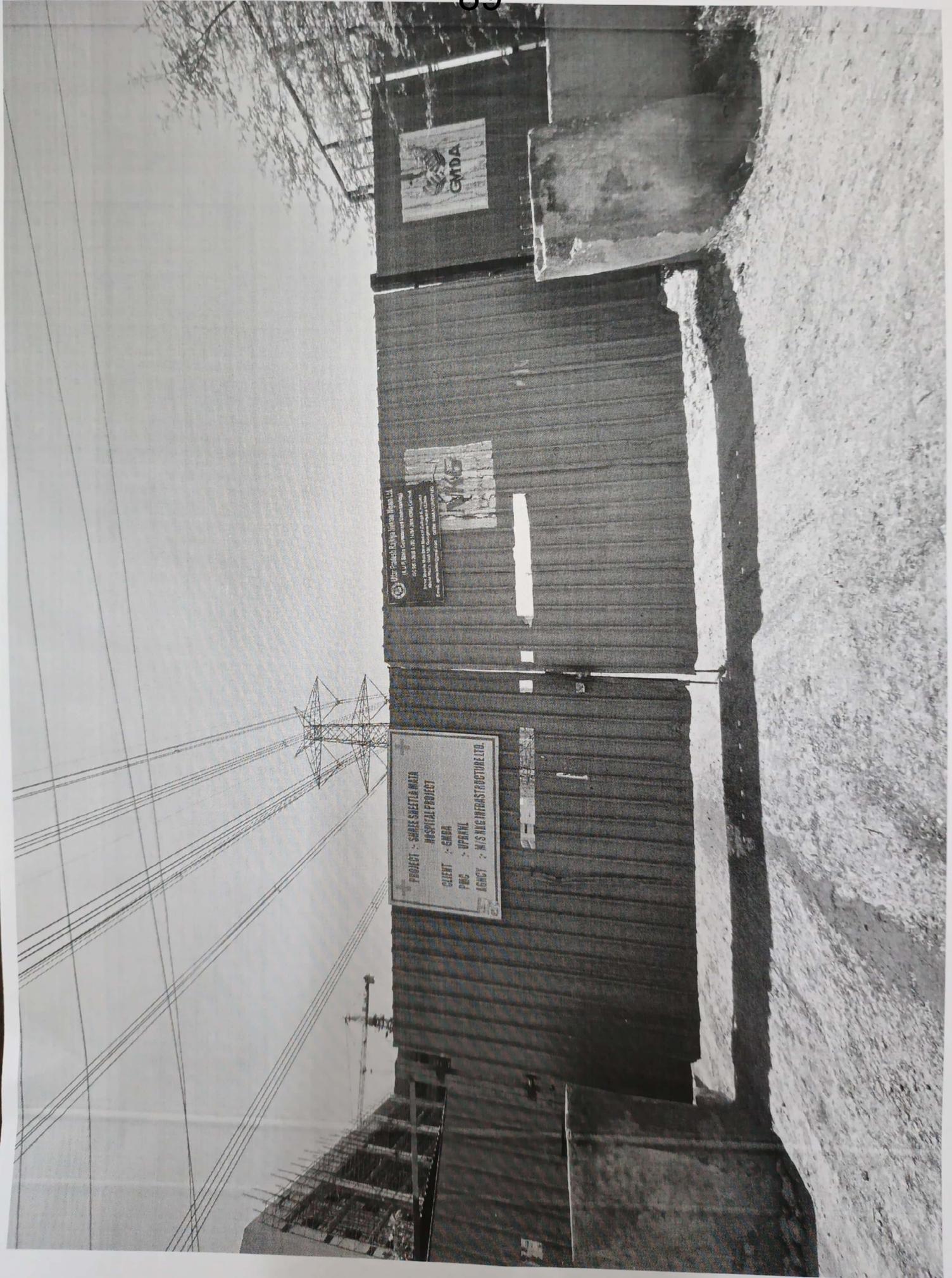
Valid Till - Mon, 18 Nov 2024

File Id - BWT-1731557380239

Name - NKG Infrastructure Limited

Site/Project Name - Shree Sheetla Mata Devi Medical College & Hospital

Site/Project Address - Shree Sheetla Mata Devi Medical College & Hospital at
Majra Sec - 102A Gurugram




Uttar Pradesh Rajkiya Nigam Ltd.
 (A.U.P. State Government Undertaking)
 ISO 9001:2008 & ISO 14001:2004 (EMS) Certified
 Shree Sheela Mata Devi Medical College & Hospital
 Kirti Mata, Sect-102, Gurgaon, Haryana 122006
 E-mail: uprn.nigam@gmail.com GSTIN: 06AAACU1511F1C0


**PROJECT :- SHREE SHEELA MATA
 HOSPITAL PROJECT**
CLIENT :- GMDA
PMC :- UPRNL
AGENCY :- M/S NKG INFRASTRUCTURE LTD.







