

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

EXECUTION APPLICATION NO. 41 OF 2023
(OLD M.A. NO. 16 OF 2023)
IN
O.A. NO. 94 OF 2021

IN THE MATTER OF:

HAIDER ALI

APPLICANT

VERSUS

UNION OF INDIA & ORS

RESPONDENTS

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PLACE:- New Delhi

DATE:- .01.2026

Through:-

Priyata Chakraborty

PRIYATA CHAKRABORTY,
Advocate for Added Respondent No.5
16/12, Semal Road, Shipra Suncity,
Indirapuram, Gaziabad, U.P-201014.

Email-priyatachakraborty1992@gmail.com

Mob-8777346969.

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

EA No. 41 of 2023

Hyder Ali

Vs.

Union of India & Ors.

IN THE MATTER OF:

HAIDER ALI

APPLICANT

VERSUS

UNION OF INDIA & ORS

RESPONDENTS

MEMO OF PARTIES

HAIDER ALI

PRESIDENT

AAM YUVA JAN KALYAN SANSTHA, ALWAR

R/O 35, SAIN ENSLAM SCHOOL,

BACKSIDE, MUNGDA, ALWAR,

RAJASTHAN-301001

...APPLICANT

VERSUS

1. SH. PANKAJ KUMAR

SECRETARY,



MINISTRY OF WATER RESOURCES

627, SHRAM SHAKTI BHAWAN,

RAFI MARG, NEW DELHI-110001

2. SH. SHARATH SRIDHARAN

CHAIRMAN,

BOARD OF CONTROLS FOR CRICKET IN INDIA

4TH FLOOR, CRICKET CENTRE,

WANKHEDE STADIUM

D ROAD, CHURCHGATE

MUMBAI-400020

INDIA

3. SHRI NARESH KUMAR

CHIEF SECRETARY,

GOVERNMENT OF NCT OF DELHI

SECRETARIAT, IP ESTATE,

NEW DELHI-110002

4. SH. MANU KUMAR SRIVASTAVA

CHIEF SECRETARY,

GOVERNMENT OF MAHARASHTRA

CS OFFICE, MAIN BUILDING,

MANTRALAYA, 6TH FLOOR,

MADAME CAMA ROAD,

MUMBAI, MAHARASHTRA



5. SHRI RAJ KUMAR
CHIEF SECRETARY,
GOVERNMENT OF GUJARAT,
SACHIVALAYA,
GANDHI NAGAR,
GUJARAT

6. PRASHANT GARGAVA
MEMBER SECRETARY,
CENTRAL POLLUTION CONTROL BOARD
PARIVESH BHAWAN, EAST ARJUN NAGAR,
DELHI-110032

7. SHRI NITESH KUMAR MISHRA
JOINT SECRETARY,
MINISTRY OF YOUTH AFFAIRS AND SPORTS,
413, C WING, SHASTRI BHAWAN,
NEW DELHI.



...RESPONDENTS/CONTEMNORS

- 8) ACA Stadium
C/o Barsapara Assam Cricket Association,
Through Pritam Mahanta, Chief Executive Officer,
E-mail: assamca@rediffmail.com
- 9) Saurashtra Cricket Association Stadium,
C/o Saurashtra Cricket Association ,

Through Himanshu P Shah, Hon. Secretary,

E-mail: saucricket@gmail.com

10) Shaheed Veer Narayan Singh International Stadium

C/o Chhattisgarh State Cricket Sangh, maintenance of the stadium
is under PWD

Through Dinesh Ready Sub Engineer,

E-mail: dkroy16.71@gmail.com

11) Dr. Y.S. Rajasekhara Reddy ACA VDCA Cricket Stadium,

C/o Andhra Cricket Association,

Through K K Srinivas Prasad, Project Management Consultant,

E-mail: srinivas1029@gmail.com

12) Eden Gardens,

C/o the Cricket Association of Bengal,

Through Naresh Ojha, Honorary Secretary,

E-mail: cab@bengacricket.com

ojhal@me.com

13) VCA Stadium, Civil Lines,

C/o Vidarbha Cricket Association,

Through Paresh Douthkhani, General Manager,

E-mail: admin@vca.co.in

14) Arun Jaitley Stadium

C/o Delhi and District Cricket Association,

Through Ajay Kumar Chaurasia, Chief Engineer (Civil)



Email: akc1967@gmail.com

15) MCA Cricket Stadium, Gahunje,

C/o. Maharashtra Cricket Association

Through Shri Manohar R. Bhaysar, Store and Purchase Manager

E-mail: cricketmaharashtra@yahoo.com

16) Sawai Mansingh Stadium

C/o Rajasthan Cricket Association

Through Bhawanishankar Samota, Secretary, RCA

Email: rca@cricketrajasthan.in

17) Holkar Stadium

C/o Madhya Pradesh Cricket Association

Through Rohit D Pandit, CAO, MPCA,

Email: cricket.operations@mpcaonline.com

18) Dr. DY Patil Stadium,

C/o. Dr. D.Y. Patil Stadium

Through Shri SanjivDongre, Professor of Architecture,

Email: sanjiv.dongre@dypatil.edu;

19) Brabourne Stadium Cricket,

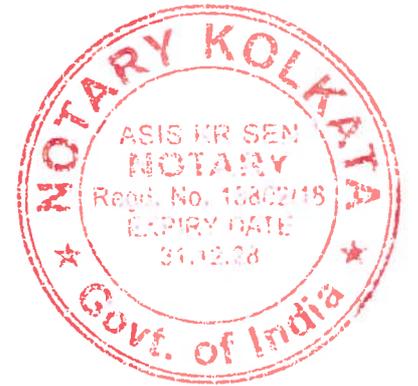
C/o. Club of India (Brabourn Stadium)

Through Shri Dushyant Patel Estate Manager,

Email: estate@cciclub.in

20) Wankhede Stadium

C/o. Mumbai Cricket Association, Wankhede Stadium



Through Shri Jaykrishna Pete Maintenance in –charge

Email: jalkrishnapatie@yahoo.in

21) Green Park Stadium

C/o. Department of Sports Uttar Pradesh (UPCA)

Through Smt. Mudrika Pathak Dy. Director

Email: dydirectorsports@gmail.com

22) Bharat Ratna Shri Atal Bihari Vajpayee Ekana Cricket Stadium

C/o Not Provided,

Through Pradeep Singh Liaising Officer,

Email: Not given

23) M A Chidambaram Stadium

C/o the Tamil Nadu Cricket Association

Through R.I Palani, Honorary Secretary,

Email: office@tnca.in

24) Rajiv Gandhi International Stadium

C/o Hyderabad Cricket Association

Through A. Srinivas Goud, Chandra Shekar, Srikanth Reddy Civil

Engineer, Chief Curator, Estate Manager

Email: srinivasankamgari@gmail.com,

chandu_cricket30@gmail.com, srikanth.oiadri@gmail.com

25) Sports Hub International Cricket Stadium



C/o. Kariavattom Sports Facilities Limited (KSFL)

Through Ram Gopal, Manager

Email: ram.varma@ilfsindia.com

26) Himachal Pradesh Cricket Association Stadium

C/o Himachal Pradesh Cricket Association

Through Mr. Avnish Parmar Secretary, HPCA

Email: secretary@hPCA.cricket

27) Chaudhry Bansi Lal Cricket Stadium

C/o Haryana Cricket Association

Through Anuj Sharma General Manager (Admin and Operations)

Email: hca@haryanacricket.com

28) IS Bindra Cricket Stadium, PCA

C/o Punjab Cricket Association

Through Akshoy Biswal Manager Maintenance,

Email: engrs.pcastadium@gmail.

29) Barabati Stadium

C/o Odisha Olympic Association

Through Subrat Kumar Behera CEO

Email: ceo@odishacricket.in



...ADDED RESPONDENT

SUPPLEMENTARY AFFIDAVIT ON BEHALF OF CRICKET
ASSOCIATION OF BENGAL [CAB], THE ADDED RESPONDENT NO.
5/ THE RESPONDENT NO. 12.

I, Chinmay Kumar Nayak, son of Umakanta Nayak, aged about 45 years, by faith Hindu, by occupation Service, and working for gain with the respondent at DR. B.C. ROY CLUB HOUSE, EDEN GARDENS, PS - MAIDAN, KOLKATA 700021, do hereby solemnly affirm and say as follows:

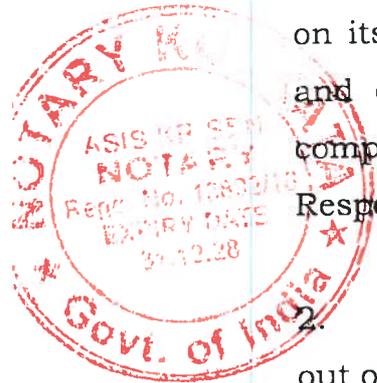
1. I am the CEO and authorized representative of the Respondent no. 12 abovenamed. I have been duly authorised by the Respondent no. 12 to swear and affirm the instant affidavit for and on its behalf. I am and have made myself fully aware of the facts and circumstances of the present case and as such I am duly competent to swear this affidavit for and on behalf of the Respondent no. 12.

2. The instant execution application [EA No.41 of 2023] arises out of OA No. 94 of 2021.

3. In OA No. 94 of 2021 (MA No. 16 of 2023), issues relating to usage of ground water for maintenance of play grounds and ensuring that effective rain water harvesting and water storage/recharging systems are installed in all playgrounds to save ground water, were primarily under consideration.

4. In the instant proceeding the following four pleadings have been filed, till date, on behalf of CAB:-

- a. A reply dated May 23, 2024
- b. A Supplementary reply dated November 21, 2024
- c. A Supplementary reply dated March 17, 2025



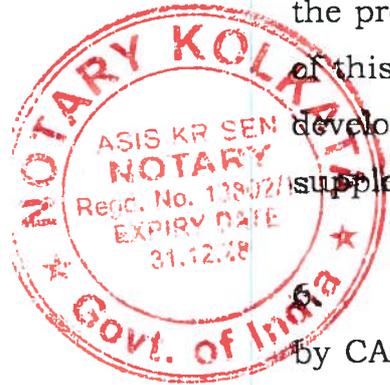
d. A Supplementary reply dated July 15, 2025

The contents of the said reply and supplementary replies are absolutely true and correct.

5. The instant supplementary affidavit is being filed by CAB to put on record certain subsequent developments that has occurred after the filing of the reply dated May 23, 2024 and the supplementary/ additional replies dated November 21, 2024, March 17, 2025 and July 15, 2025 by CAB before this Hon'ble Tribunal. The present supplementary affidavit and the documents annexed hereto are extremely imperative for the fair and just adjudication of the present matter. In such view of the matter, CAB prays for leave of this Hon'ble Tribunal to put on record the aforesaid subsequent developments and documents in connection thereto through this supplementary affidavit, before this Hon'ble Tribunal.

6. It has already been indicated in the previous pleadings filed by CAB that one M/s Dhal Engineering Pvt. Ltd has been selected as the EPC contractor for the work of Survey, Design, Construction and Installation including commissioning of 150 KLD Sewage Treatment Plant implementing MBBR technique and Rain Water Harvesting at Eden Gardens Stadium, Kolkata.

7. The said M/s Dhal Engineering Pvt. Ltd by a letter dated December 18, 2025 has communicated that as on December 17, 2025 the terrace floor casting of the STP plant room and associated water tanks has been completed and that 90% of the civil works in connection with the work has already been completed. In this connection a copy of the letter dated December 18, 2025 issued by M/s Dhal Engineering Pvt. Ltd alongwith its annexures is annexed hereto and marked as Annexure 'A'.



8. It is humbly prayed that this Hon'ble Tribunal may be pleased to take the instant supplementary reply filed by CAB on record and consider the same while adjudicating the present proceeding.

Chinmaya Kumar Nayak
Added Respondent No.5/Respondent No.12

PLACE:- KOLKATA

Chief Executive Officer
 The Cricket Association of Bengal

Through:-

DATE:-31.12.2025

Priyanta Chakraborty

Identified by me

Amitava Mitra

Amitava Mitra, Advocate
 Regn. No. WB/1887/1995

PRIYATA CHAKRABORTY,

Advocate for Cricket Association of Bengal

16/12, Semal Road, Shipra Suncity,

Indirapuram, Gaziabad, U.P-201014.

Email-priyatachakraborty1992@gmail.com

Mob-8777346969.

VERIFICATION

I, Chinmay Kumar Nayak, son of Umakanta Nayak, aged about 45 years, serving as CEO of CAB, do hereby verify that the statements made in paragraphs 1, 3 to 6 the foregoing Reply are true to my knowledge, those contained in paragraphs 2 and 7 are based on my information derived from the official records, which I verily believe to be true and those contained in paragraph 8 is my respectful humble submissions and that I have not suppressed any material facts before this Hon'ble Tribunal.

Identified by me

Amitava Mitra

Amitava Mitra, Advocate
 Regn. No. WB/1887/1995

Chief Executive Officer
 The Cricket Association of Bengal

Chinmaya Kumar Nayak

Added Respondent No.5/Respondent No.12



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**IN THE MATTER OF:**

HAIDER ALI,

...APPLICANT

VERSUS

UNION OF INDIA AND ORS.

...RESPONDENTS/CONDEMNERS

AFFIDAVIT

I, Chinmay Kumar Nayak, son of Umakanta Nayak, aged about 45 years, serving as CEO of CAB, the Added Respondent No. 5/the Respondent no. 12 at Kolkata do solemnly affirm and state as follows:

1. I am the CEO and authorized signatory of the CAB. I am and have made myself well and fully acquainted with the facts and circumstances of the instant case. I have been authorized by the CAB to make and affirm the instant affidavit for and on its behalf.

01 JAN 2026

As such, I am competent to affirm the instant affidavit for and on behalf of the CAB.

2. That I have read and understood the contents of the accompanying Application. I state that the facts stated in the Application are true and correct to my knowledge based on records. The legal submissions are based on advise received and believed by me to be correct.

3. That the annexures are true copies of their respective originals.

Identified by me

Amitava Mitra
Amitava Mitra, Advocate
Regn. No. WB/1887/1995

Chinmay Kumar Nayak
DEPONENT
Chief Executive Officer
The Cricket Association of Bengal

VERIFICATION

I, Chinmay Kumar Nayak, the deponent above named, do

hereby verify that the contents of my foregoing affidavit are true and correct, that no part of it is false or incorrect and that nothing material has been concealed therefrom.

Verified by me at Kolkata on this the 21 day of December, 2025.

Identified by me

Amitava Mitra
Amitava Mitra, Advocate
Regn. No. WB/1887/1995

Chinmay Kumar Nayak
DEPONENT
Chief Executive Officer
The Cricket Association of Bengal



Solemnly affirm and Declare
Before me on Identification

ASIS KUMAR SEN
ASIS KUMAR SEN
City Civil Court
Kolkata

Reg. No. 13802/18 Govt. Of India

01 JAN 2026

**The Cricket Association of Bengal**

Dr. B C Roy Club House,
Eden Gardens,
Kolkata - 700 021

Work Progress Report (STP & RWH) on 17th Dec 2025 of 150 KLD MBBR Based STP and Rainwater Harvesting at Eden Gardens - Kolkata

Report Date : 18-12-2025

From :

Mr. Manoranjan Dhal (Managing Director)
DHAL ENGINEERING PVT. LTD.



Dhal Engineering Pvt. Ltd.

Block G, 9A Naskarhat,
West Bengal,
Kolkata - 700 039

M: 9330901701 | E : info@dhalengineering.com



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Ref: DEP/CAB-KOL/PROJ-STP&RWTP/25-26/1218

Date: Dec 18, 2025

To
The Honorable Secretary
The Cricket Association of Bengal

Dr. B C Roy Club House,
Eden Gardens, Kolkata – 700 021

Kind Attention : The Honorable CEO & The Chief Engineer (CAB)

Subject: Progress Update: STP Civil Works Completion (90%) as on 17 Dec, 2025 for Survey, Design, Construction, Installation, and Commissioning of 150 KLD Sewage Treatment Plant (MBBR Technique) and Rain Water Harvesting System at Eden Gardens Stadium, Kolkata

References:

1. Tender No. 163(4)/8/1522/2025 dated January 30, 2025
2. Letter of Intent (LOI) Ref. No. 163(4)/30/2032/2025 dated March 1, 2025
3. Work Order Ref. No. 163(4)/13/22832/2025 dated March 27, 2025
4. Purchase Order Ref. No. 163(4)/21/2616/2025 dated April 01, 2025
5. Progress Report Ref. DEP/CAB-KOL/PROJ-STP&RWTP/25-26/1010 dated October 09, 2025

Dear Sir,

This is to provide a formal update on the status of the STP civil works as of December 17, 2025.

With the successful completion of the terrace floor casting for the STP plant room and associated water tanks, we have now achieved over 90% completion of the civil works in accordance with the approved drawings and designs.

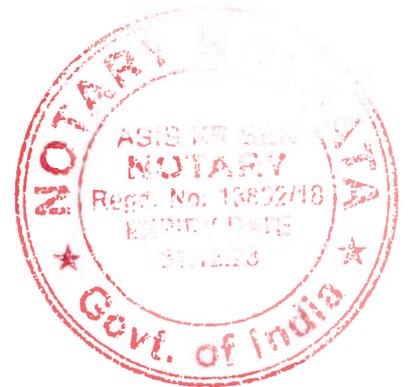
Please find the attached photo documentation for your review and records.

Regards

DHAL ENGINEERING PRIVATE LIMITED

MANAGING DIRECTOR

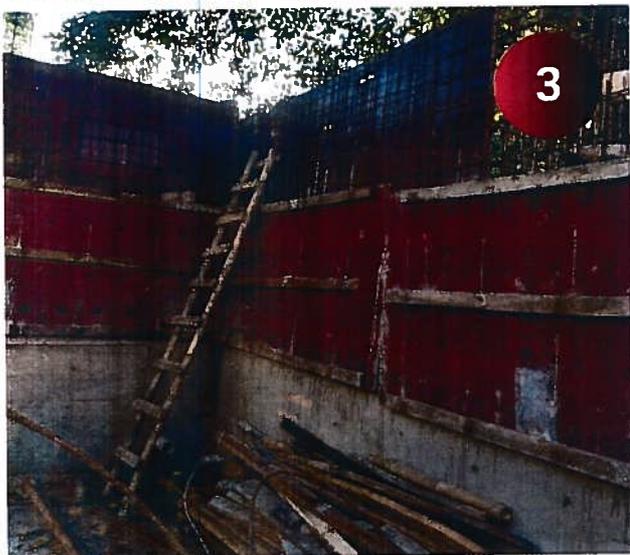
Manoranjan Dhal
Director
Dhal Engineering Pvt. Ltd.
Mobile : 9330901701 | Email : info@dhalengineering.com
Address : Block G, 9A Naskarhat, Kolkata, West Bengal, 700 039



Work Status Update of 150 KLD MBBR Based STP & RWH at Eden Gardens

Documentation of Wall Casting (07 Nov 2025)

Casting Work



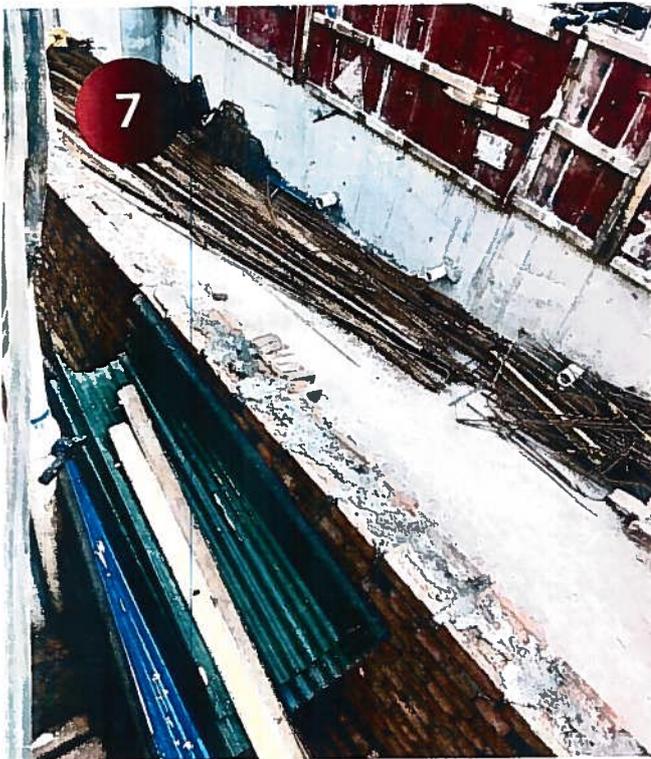
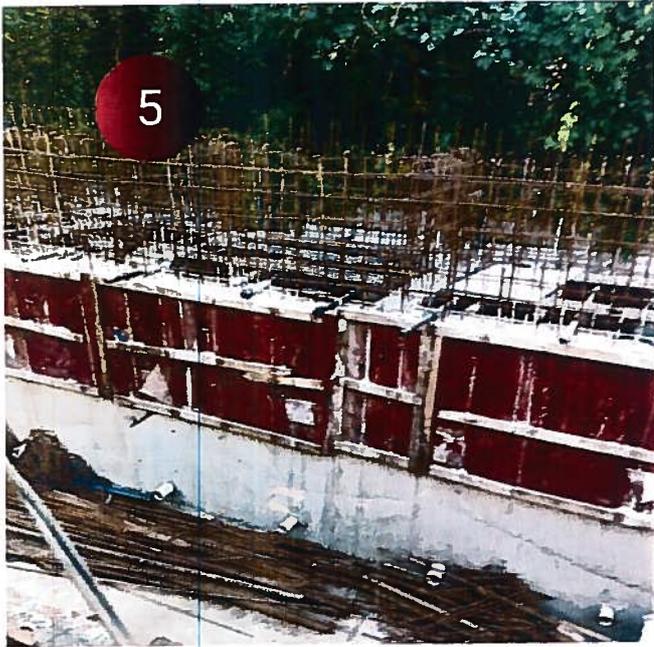
Pic 1 - 4: Final Casting Preparation of Walls



Urgent Work Status Update of 150 KLD MBBR Based STP & RWH at Eden Gardens

Documentation of Site Status 27th Nov - 10th Dec 2025

Brick Wall Erection



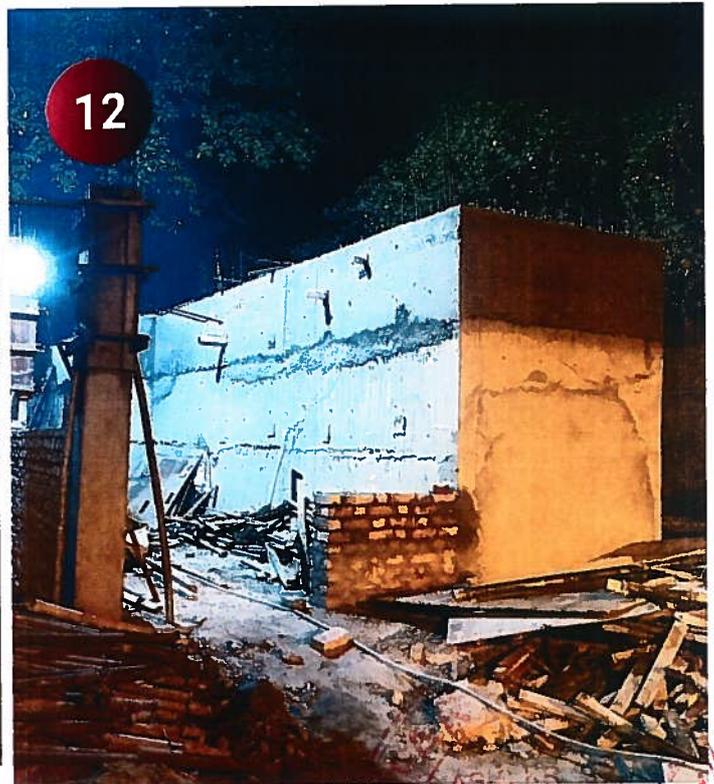
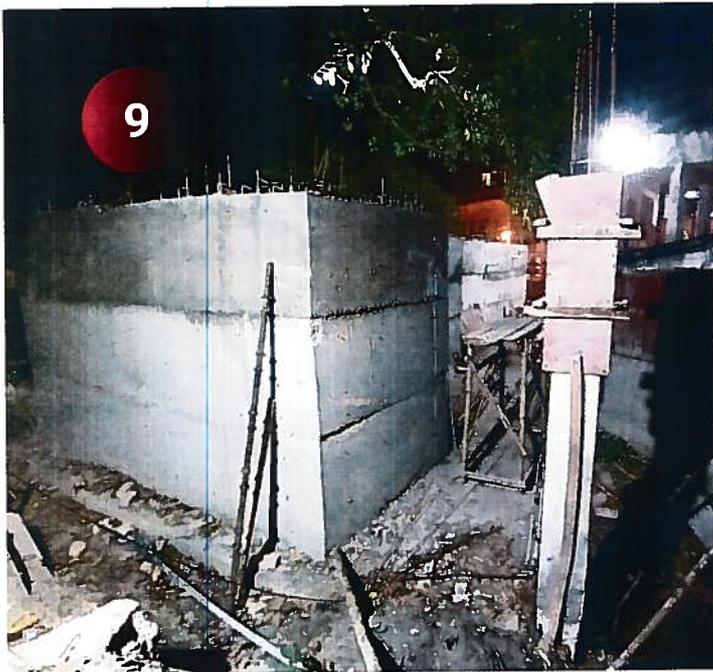
Pic 5 - 8: Brick Wall Civil Erection Ongoing Work



Urgent Work Status Update of 150 KLD MBBR Based STP & RWH at Eden Gardens

Documentation of Site Status 27th Nov - 10th Dec 2025

Tank Structure Complete Status



Pic 9 -12: RCC Tank completed upto Top Level as per design



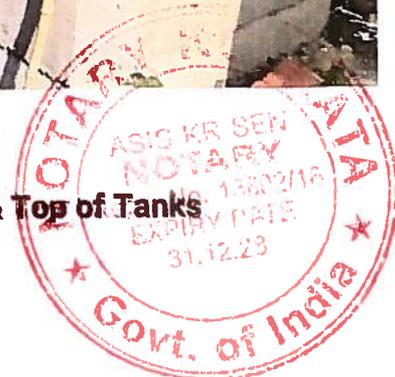
Urgent Work Status Update of 150 KLD MBBR Based STP & RWH at Eden Gardens

Documentation of Site Status 27th Nov - 10th Dec 2025

Tanks Structures Terrace Floor Casting Completed on Dec 16, 2025



Pic 13 -14: Planned Terrace Floor casting for Plant Room & Top of Tanks



Urgent Work Status Update of 150 KLD MBBR Based STP & RWH at Eden Gardens

Documentation of Site Status 10th Dec - 17th Dec 2025

STP Plant Room Terrace Floor Casting Completed on Dec 16, 2025



Pic 16 - 18: Terrace Floor Casting on STP Plant Room Completed.