

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL EASTERN
BENCH, KOLKATA
IA NO. 07 OF 2026
IN**

ORIGINAL APPLICATION NO. 83/2025

IN THE MATTER OF:

SATAM PATNAIK

...APPLICANT

Versus

STATE OF ODISHA & ORS.

...RESPONDENTS

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THROUGH



SUNIL J. MATHEWS/ JYOTI CHIB/ ASHTAMI KHATRI

Shanti Kunj, Link Road

Cuttack- 753001

(M) 9311567212

PLACE: BHUBANESWAR

DATE: 19.01.2026

Email: sjmathews@gmail.com

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL EASTERN
BENCH, KOLKATA**

**IA NO. ____ OF 2026
IN**

ORIGINAL APPLICATION NO. 83/2025 (EZ)

IN THE MATTER OF:

Satam Patnaik

...APPLICANT

Versus

1.State of Odisha through Chief Secretary of Odisha

LokaSeva Bhawan, Bhubaneswar- 751001

Email- csori@nic.in

2. ED & Plant Head, Jindal Steel Ltd.

Jindal Steel Limited, Chhendipada Road, SH-63,

PO- Jindal Nagar, District – Angul, Odisha – 759111, India

Email- pankaj.malhan@jindalsteel.com

3. District Collector, Angul

At/Po/Dist- Angul, Odisha- 752001

Email- dm-angul@nic.in

4. The Additional Chief Secretary Steel & Mines Department, Govt of Odisha

Steel and Mines Department, Government of Odisha,

Loka Seva Bhawan, Bhubaneswar, District-Khordha, Odisha, PIN-751001

Email- dsmsec.or@nic.in

5. Office of the Sarpanch, Badakerjang Gram Panchayat

At/Po-Badakerjang, Dist- Angul, Pin-759143 (Odisha)

Email- tah.bana-od@nic.in

6. Deputy Director of Mines, Talcher Circle, Talcher

Dy. Director Mines, Hatatota, Talcher 759100

Email- ddm.talcher@orissaminerals.gov.in

7. Director, Directorate of Minor Minerals,

Steel & Mines Department, Govt of Odisha.

Email- dirmms-rev@gov.in

8. DFO, Angul Division, Angul, Odisha

Email- dfoangul@gmail.com

9. Tahsildar

Tahsil Office, Banarpal,

Angul, Odisha-759128

Email: taha.bana-od@nic.in

10. Chief General Manager (Land)

IDCO, IDCO Tower, Janpath,

Bhubaneswar, Odisha-751022

Email: cgmland@idco.in

...RESPONDENTS

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL EASTERN
BENCH, KOLKATA**

**IA NO. ____ OF 2026
IN**

ORIGINAL APPLICATION NO. 83/2025

IN THE MATTER OF:

SATAM PATNAIK

...APPLICANT

Versus

STATE OF ODISHA & ORS.

...RESPONDENTS

**APPLICATION FOR GRANT OF STAY ORDER AGAINST ILLEGAL AND
FORCEFUL WORK BEING CONDUCTED BY RESPONDENT NO. 2
JINDAL STEEL LTD. IN JAMUNDA JUNGLE MINES**

MOST RESPECTFULLY SHOWETH:

1. That the Applicant has filed the present Original Application No. 83/2025 before this Hon'ble Tribunal raising serious issues of environmental violations, illegal mining/excavation of minor minerals, and unlawful project-related activities in the Jamunda Jungle Mines area, District Angul, Odisha, which is presently sub judice before this Hon'ble Tribunal.

2. That, the present Application is being filed seeking urgent interim protection and a stay on all excavation, extraction, and project-related activities being carried out in the Jamunda Jungle Mines area during the pendency of the present Original Application.
3. That despite the pendency of the present proceedings and the knowledge of the same with the Respondents, forceful and illegal work has been carried out in the Jamunda Jungle Mines area in clear disregard of law, regulatory approvals, and the authority of this Hon'ble Tribunal.
4. That, on 18.12.2025, the villagers observed excavation activity being undertaken in the Jamunda Jungle Mines area by officials and machinery associated with Respondent No. 2. Upon intervention by the Sarpanch of Badakerjang Gram Panchayat, the said activity was temporarily halted.
5. That thereafter, on multiple occasions, including on 20.12.2025 and 24.12.2025, excavation of soil and hard rock was again carried out using heavy machinery, including PC machines, in the Jamunda Jungle Mines area, without any permission or approval from the competent authority, and while the matter remains sub judice before this Hon'ble Tribunal.
6. That the Applicant immediately brought these illegal activities to the notice of the concerned authorities, including the Deputy Director of Mines,

Talcher Circle, and other officials, detailing the forceful work being undertaken in the Jamunda Jungle Mines area. A copy of the said representation is annexed herewith and marked as **Annexure A1**

7. That, the Applicant has also placed on record photographic evidence capturing the illegal excavation activities, clearly showing the use of heavy machinery in the Jamunda Jungle Mines area. The said photographs bear GPS coordinates, date, and time stamps, conclusively establishing that the activities were carried out during the pendency of the present proceedings. The said photographic evidence is annexed herewith and marked as **Annexure A2**
8. That the continuation of such activities during the pendency of the Original Application defeats the very purpose of the proceedings before this Hon'ble Tribunal and causes irreparable environmental harm, including degradation of forest land, loss of minor minerals, and ecological imbalance.
9. That the balance of convenience lies entirely in favour of granting an interim stay, as no prejudice will be caused to the Respondents by maintaining status quo, whereas continued excavation will cause irreversible damage to the environment and render the proceedings infructuous.
10. That unless this Hon'ble Tribunal is pleased to grant an immediate stay, the Respondents will continue forceful excavation and project-related activities,

resulting in permanent environmental damage and violation of statutory provisions.

PRAYER

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

- a) Pass a Stay order halting all excavation, extraction, removal of soil, stone, or other minor minerals, and all project-related activities in the Jamunda Jungle Mines area, District Angul, Odisha, during the pendency of O.A. No. 83/2025;
- b) Direct the Respondents to maintain complete status quo in respect of the Jamunda Jungle Mines area till final adjudication of the present Original Application including restraining the Respondents, their agents, contractors, or any person acting on their behalf from undertaking any activity that alters the nature, topography, or environmental character of the Jamunda Jungle Mines area; and
- d) Pass such other and further orders as this Hon'ble Tribunal may deem fit and proper in the interest of justice and environmental protection.

THROUGH



SUNIL J. MATHEWS/ JYOTI CHIB/ ASHTAMI KHATRI

Shanti Kunj, Link Road

Cuttack- 753001

(M) 9311567212

PLACE: BHUBANESWAR

DATE: 19.01.2026

Email: sjmathews@gmail.com

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL EASTERN ZONE
BENCH, KOLKATA
(Under Section 18(1) read with Section 14(1) and 15 of the National Green Tribunal
Act 2010)

ORIGINAL APPLICATION NO. _____ OF 2026

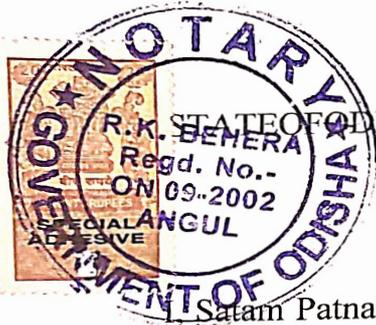
IN THE MATTER OF:

SATAMPATNAIK

...APPLICANT

VERSUS

...RESPONDENTS



R.K. BENERA
Regd. No. - ON 09-2002
SPECIAL ANGUL

AFFIDAVIT

Affidavit No. 935/2026
Dated 19th Jan 2026

Satam Patnaik S/o Purusottam Patnaik aged about 45 years, At/ Po- 6th Lane, Amlapada, Dist.-Angul, Odisha-759122 do hereby solemnly affirm and state as under:

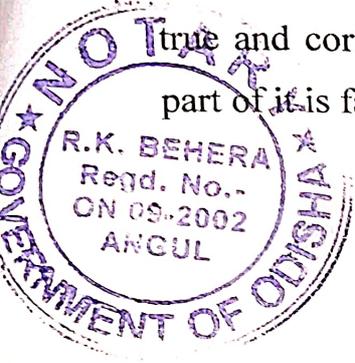
1. That I am the Applicant in the present case and Deponent in the present Affidavit, hence, I am competent to swear this Affidavit.
2. That I have read over the contents of the accompanying Application and the same is true and correct and is drafted on my instruction.

NOTARY
ANGUL

Satam Patnaik
DEPONENT

VERIFICATION

Verified on this 19th January, 2026 that the contents of the above Affidavit are true and correct, and nothing material has been concealed there from, nor any part of it is false.



IDENTIFIED BY

Sunil Mathews
DEPONENT

ADVOCATE

SUNILJ. MATHEWS

ShantiKumj, LinkRoad

Cuttack-753001

(M)9311567212

Email:sjmathews@gmail.com

Jan 19.26
NOTARY
ANGUL

PLACE: BHUBANESWAR

DATE : 19.01.2026

Affidavit No. *935 / 2026*
dated this *19th* day of *Jan* 20*26*
The above named deponent having been
identified by Sri. *S.A. Mathews*
..... Advocate, Angul
solemnly affirmed before me this
the *19th* day of *Jan*
2026 at A.M./P.M. in
the court premises that the contents
of this affidavit true to the best of
his/her knowledge.

Jan 19.26
ROHITA KUMAR BEHERA
NOTARY
ANGUL, ODISHA
Regd. No.-ON 08-2002
Cell-9438737146

Date: 24-12-2025

To
The Dy Director Mines
Talcher Circle
Talcher

Subject: Forceful Work in Jamunda Jungle Mines Area by Jindal Steel Limited, Angul

Reference:

- 1- Jamunda Jungle Mines NGT Case No.83/2025/EZ.
- 2- Odisha Minor Mineral Concession Rule, 2016 and Amendments.

Dear Sir

With reference to our telephonic conversation on 18th December 2025, and further to our meeting held at your esteemed office on 22nd December 2025, regarding the captioned subject, please find the details below for your kind information and necessary action.

Background:

The matter pertaining to Jamunda Jungle Mines is subnude before the Hon'ble National Green Tribunal (NGT), as irregularities have been identified in the handing over of an active minor mineral mine to Jindal Steel Limited by the State.

Based on the irregularities, the Hon'ble Court has registered the case, and the matter is presently at the subjudice stage.

Recent Incident:

Our villagers observed that, in the presence of officials of Jindal Steel Limited (**Respondent No. 2 in NGT Case No. 83/2025/EZ**), excavation activities were initiated in the Jamunda Jungle Mines area on 18th December 2025. Upon the intervention of the Sarpanch, Badakerjang Gram Panchayat, the said work was immediately stopped. The same was duly informed to your good self during our meeting.

Again, this morning, we observed that officials from the IR Department and Civil Department of Jindal Steel Limited, with the assistance of a PC machine, were carrying out excavation of soil and hard rock in the Jamunda Jungle area (photographs attached herewith), without any approval from the office of the DDM, Talcher Circle, Talcher.

The same was informed to the DDM, Talcher Circle, by the Sarpanch, Badakerjang Gram Panchayat, over the telephone. Additionally, the petitioner Satam Patnaik also informed the JMO, Angul, of the same over the telephone.

This is violation of OMMC Rule,2016: As per OMMC Rule, 2016 and amendments, if any one consuming soil, morram, sand, Stone boulder and other minor mineral for his construction

work he must take permission with deposit of royalty and other government dues to state government. But in this case Ji dal Steel Limited has completely violated the rules and regulations of state government.

In view of the above facts & past records the Project Company (JSPL) is a regular with intentional violator of OMMC Rule 2016 & Amendments and consuming minor minerals without taking any prior permission or deposits to state government and even though matter is subjudice in Hon'ble NGT. Due to this violations State Government losses Crores of Revenues and impacted to Environment for his illegal excavations.

PRAYER

- 1- Request to pass an order from office of your good self to stop extraction & procurement of minor minerals (soil & stone) from "Jamunda Jungle Mines Area" by Jindal Steel Limited till 100% compliance of provisions, conditions & guidelines of Minor Mineral Act & Rules.
- 2- Request to pass an order from office of your good self to stop any type of "Project Work" in the foothills of "Jamunda Jungle Mines Area " by Jindal Steel Limited till final verdict of Hon'ble NGT in Case No. 83/2025/EZ.
- 3- Request to take legal action against JSL's Civil & IR Officials & must seize all equipment's which are engaged for extraction of minor minerals by Jindal Steel Limited, Angul.

Looking forward to a prompt and positive response to safeguard national interests and ensure action is taken in accordance with the law of the land. I also request that the outcome of the action taken & all correspondence to JSPL be shared with the petitioner as a priority to maintain transparency in this matter.

Thanking you

Satam Patnaik

Satam Patnaik

C/o: Shri Bala Krushna Pattanaik Trust

6th Lane, Amalapada, Angul

Odisha

M: 8527070196

Email: satam.patnaik@gmail.com

Copy To:

- 1- The Mining Officer, Angul
- 2- The Director, Directorate of Minor Minerals, Steel & Mines Department, Govt. of Odisha.

- 3- The Deputy Director(Tech-Geology)
Directorate of Minor Minerals,
Steel & Mines Department,
Govt. of Odisha.
- 4- The Director Mines
Steel & Mines Department,
Govt of Odisha.
- 5- The Add. Chief Secretary,
Steel & Mines Department,
Govt of Odisha.
- 6- The Secretary - Revenue & Disaster Management, Govt of Odisha.
- 7- The Chief Secretary, Govt. of Odisha.
- 8- The RDC(ND), Sambalpur, Odisha.
- 9- The CGM(Land),IDCO,Bhubaneswar.
- 10- The DM & Collector, Angul.
- 11- The ADM(Revenue), Angul.
- 12- The Sub-Collector, Angul.
- 13- The LAO(General), Angul.
- 14- The Tehsildar, Banarpal, Angul.
- 15- The IIC, Industrial Police Station, Nisha, Angul.
- 16- The SDPO, Angul
- 17- The SP, Angul.
- 18- The DFO, Angul Division, Angul.
- 19- The RCCF, Angul Circle, Angul.
- 20- Hon'ble Chief Minister, Odisha.
- 21- Hon'ble Governor, Odisha
- 22- The Sarpanch, Badakerjnag GP, Angul.
- 23- The ED & Plant Head, Jindal Steel Limited, Angul.

PHOTOGRAPHS DURING EXCAVATION ON 20-12-2025



PHOTOGRAPHS DURING EXCAVATION ON 24-12-2025





sunil mathews <sjmathews@gmail.com>

Advance Service of Application for Stay in OA 83/2025

1 message

Sunil J. Mathews <sjmathews@gmail.com>

19 January 2026 at 10:48

To: csori@nic.in, pankaj.malhan@jindalsteel.com, dm-angul@nic.in, dsmsec.or@nic.in, tah.bana-od@nic.in, ddm.talcher@orissaminerals.gov.in, dirmms-rev@gov.in, dfoangul@gmail.com, taha.bana-od@nic.in, cgmland@idco.in

Cc: Satam Patnaik <satam.patnaik@gmail.com>

Dear all,

Please find attached by way of advance service, the copy of Application for stay in OA 83/2025 - **Satam Patnaik v. State of Odisha and Ors.** The next date of hearing is **06.02.2026**.

--

Sunil J. Mathews, Advocate
Attn: Padmanabhan
114, Lawyer's Chambers
Supreme Court of India
New Delhi - 110 001

Mobile: +91.93115.67212

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 **Application for Stay - Jamunda Mines.pdf**
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