

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**

**EASTERN ZONE BENCH, KOLKATA**

**OA NO. 16 OF 2026**

**IN THE MATTER OF:**

RANDHIR GHOSH

...Applicant

VERSUS

STATE OF WEST BENGAL & ORS.

...Respondents

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**Date: 13.01.2026**

**New Delhi**

**FILED BY: -**

**RAHUL KHURANA, HASIL JAIN, ISHAN SHARMA**

**Advocates**

**Off: A-174 A, 2<sup>nd</sup> Floor, Defence Colony**

**New Delhi-110024**

**M. 9811894060, 7838707338**

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## **SYNOPSIS**

The present Original Application is being filed under section 14, 15 and 18 of the NGT Act 2010 against the illegal, unscientific and reckless sand mining being carried out by Respondent No.7 namely Greego Drive Pvt. Ltd, in the Subarnarekha River at Sand Mining Block No. MIN\_JH\_29B, admeasuring 20.54 hectares, situated at Mouza-Patina, District-Jhargram, West Bengal. That the said mining is in blatant violation of environmental laws and statutory norms.

That the Respondent No.7 is conducting mining operations in the said sand mining block without obtaining mandatory Environment Clearance (EC), Consent to Establish (CTE) and Consent to Operate (CTO), thereby rendering the entire mining activity illegal and void ab initio. As evidence of continuous and ongoing illegal mining operations, the Applicant is in possession of road e-challans issued for transportation of sand/riverbed materials, which clearly establish active extraction and movement of minor minerals from the said mining block.

It is submitted that it is in fact, the Respondent no.5 West Bengal Mineral Development & Trading Corporation Limited in whose name, the Terms of Reference (ToR) for the said mining block were issued by SEIAA, West Bengal on 31.12.2025, as reflected on the PARIVESH PORTAL. That is to say, the process of Environment Clearance is still going on in the name of Respondent no.5 for the said block, however it is the Respondent no.7 who is undertaking the illegal mining activities on the said Block. Even otherwise, the process of environmental appraisal is still ongoing and that the Environment Clearance has not yet been granted. Therefore, any entity cannot do mining on the said Block until the process of grant of EC gets completed.

The Applicant further submits that Respondent No.7 is carrying out sand mining operations in water-submerged areas of the river, as evident from geotagged photographs, which is expressly prohibited under the EIA Notification, 2006, Sustainable Sand Mining Guidelines, 2016 and Enforcement & Monitoring Guidelines for Sand Mining, 2020, and has resulted in severe ecological imbalance, damage to river morphology and depletion of natural resources.

The actions of Respondent No.7 are squarely covered by the settled law laid down by the Hon'ble National Green Tribunal and the Hon'ble Supreme Court, including *Balbir Sandhu & Ors. v. State of Uttar Pradesh & Anr.* (2023), *State of Uttar Pradesh v. Gaurav Kumar* (2025) and *Vijay Chandel v. State of Himachal Pradesh & Ors.* (2025) wherein it has been categorically held that mining activities carried out in absence of mandatory environmental clearances and statutory consents are illegal and attract strict action, including immediate closure and imposition of environmental compensation under the "Polluter Pays" principle.

In these circumstances, the Applicant has approached this Hon'ble Tribunal seeking directions for immediate stoppage of illegal sand mining, imposition of environmental compensation upon Respondent No.1, and initiation of action against the District Magistrate, Mining Officer, Jhargram and Regional Officer, WBPCB, Jhargram for collusion, negligence and dereliction of statutory duties, along with such other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case.

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

**OA NO. \_\_\_\_\_/2026**

**IN THE MATTER OF**

Randhir Ghosh  
s/o Kashi Nath Ghosh  
6/6 N.C.DAS. ROAD  
Baranagar(m)  
Noapara, North24 Parganas  
West Bengal-700090

...Applicant

VERSUS

1. State of West Bengal  
Through Chief Secretary  
Nabanna,13<sup>th</sup> Floor  
325 Sarat Chatterjee Road, Shibpur  
Howrah, West Bengal- 711102  
Email [cs-westbengal@nic.in](mailto:cs-westbengal@nic.in) Respondent no.1
2. West Bengal Pollution Control Board  
Through Member Secretary  
Paribesh Bhawan, 10A  
Block-L. A, Sector 3, Salt Lake City  
Kolkata, West Bengal-700098  
Email: [ms.wbpcb-wb@bangla.gov.in](mailto:ms.wbpcb-wb@bangla.gov.in) Respondent no.2
3. Member Secretary,  
State Level Environment Impact Assessment Authority  
Pranisampad Bhaban, 5<sup>th</sup> floor, LB-2,  
Sector-3 Salt Lake City  
Kolkata, West Bengal- 700106  
Email: [environmentwb@gmail.com](mailto:environmentwb@gmail.com) Respondent no.3
4. District Magistrate Jhargram West Bengal  
Jhargram, West Bengal, India, Pin: 721507  
Email: [jhargramdm@gmail.com](mailto:jhargramdm@gmail.com) Respondent no.4
5. West Bengal Mineral Development &  
Trading Corporation Limited  
Through Chairman  
3<sup>rd</sup> floor, DJ-10, WBIIDC Building  
DJ Block, Sector-2, Salt Lake City,  
Kolkata, West Bengal-700091  
Email: [wbmdtcltd@gmail.com](mailto:wbmdtcltd@gmail.com) Respondent no.5

6. Directorate of Mines and Minerals  
Through Director  
4, Abanindranath Tagore Sarani  
2<sup>nd</sup> floor, Kolkata, West Bengal- 700016  
Email: Dir.dmm-wb@nic.in Respondent no.6
7. Greego Drive Pvt. Ltd.  
Paschim Medinipur  
Zilla Parishad Super Market Complex No. F-13,  
Vill& P.O Midnapore,  
Paschim Medinipur,  
West Bengal 721101  
Email: greegodrive@gmail.com Respondent no.7

**APPLICATION UNDER SECTIONS 14, 15 AND 18 OF THE NATIONAL GREEN TRIBUNAL ACT, 2010 FOR RESTRAINING ILLEGAL SAND MINING BEING CARRIED OUT IN VIOLATION OF ENVIRONMENTAL LAWS AND FOR IMPOSITION OF PENALTY AND PROSECUTION AGAINST THE VIOLATORS.**

**MOST RESPECTFULLY SHOWETH:**

1. That the Applicant is a law-abiding citizen of the country and has preferred the present application in the interest of environmental protection and conservation of river ecology.
2. That the present Original Application is being filed against the illegal, unscientific and reckless sand mining being carried out by Respondent No.7 namely Greego Drive Pvt. Ltd, in the Subarnarekha River at Sand Mining Block No. MIN\_JH\_29B, admeasuring 20.54 hectares, situated at Mouza-Patina, District-Jhargram, West Bengal.
3. That the Respondent No.7 is conducting mining operations in the said sand mining block without obtaining mandatory Environment Clearance (EC), Consent to Establish (CTE) and Consent to Operate (CTO), thereby rendering the entire mining activity illegal and void ab initio.

4. That it is humbly submitted that it is in fact Respondent no.5 i.e. West Bengal Mineral Development & Trading Corporation Limited in whose name, the Terms of Reference (ToR) for the said mining block were issued by Respondent no.3 i.e. SEIAA, West Bengal on 31.12.2025, with Proposal No. SIA/WB/MIN/548961/2025 as reflected on the PARIVESH PORTAL of MoEF & CC. This reflects that the process of Environment Clearance is still going on in the name of Respondent no.5 for the said block, however it is the Respondent no.7 who is undertaking the illegal mining activities on the said Block. Even otherwise, the process of environmental appraisal is still ongoing and that the Environment Clearance has not yet been granted. Therefore, any entity cannot do mining on the said Block until the process of grant of EC gets completed.

The status showing grant of ToR dated 31.12.2025 in favour of Respondent no.5 (WBMDTCL) displayed at PARIVESH PORTAL is annexed as **ANNEXURE A/1**.

5. That the Applicant further submits that Respondent No.7 is carrying out sand mining operations in water-submerged areas of the river, as evident from geotagged photographs, which is expressly prohibited under the EIA Notification, 2006, Sustainable Sand Mining Guidelines, 2016 and Enforcement & Monitoring Guidelines for Sand Mining, 2020, and has resulted in severe ecological imbalance, damage to river morphology and depletion of natural resources.

The geotagged photographs of illegal sand mining at block MIN\_JH\_29B dated 03.01.2026 along with Geo reference Coordinate-of the Mining Block is annexed as **ANNEXURE A/2 (colly)**.

6. That the Applicant is in possession of copies of road e-challans issued for transportation of sand/riverbed material from the said mining block, which clearly establishes that Respondent No.7 is actively

extracting and transporting sand despite absence of statutory clearances.

The copy of E-challan issued in the name of the Respondent no.7 dated 10.12.2025 is annexed as **ANNEXURE A/3**.

7. That it is further submitted that it is highly disturbing aspect of the present case that the Department of Mines and Minerals is issuing road e- challans for transportation of minerals extracted from the said mine, even though the mine does not possess valid EC, CTE or CTO. It is submitted that issuance of road e-challans in such circumstances amounts to institutional facilitation of illegal mining, defeating the very object of environmental regulations and nullifying the mandatory requirement of prior environmental clearances.
8. That aggrieved by the continued environmental violations and persistent regulatory inaction, the Applicant has duly approached and submitted formal complaints and representations before the State Environment Impact Assessment Authority (SEIAA), West Bengal; West Bengal Mineral Development & Trading Corporation Limited; the District Magistrate, Jhargram; the West Bengal Pollution Control Board (WBPCB); and the Directorate of Mines and Geology, Government of West Bengal. However, despite such repeated complaints and intimation to the competent authorities, no effective remedial, preventive or coercive action has been initiated, and the illegal sand mining activities are continuing unabated, causing serious and irreversible threats to the riverine ecology, environment, public health and the rule of law.

The copy of complaints dated 20.12.2025 made to the concerned authorities with receipts and tracking report are annexed as **ANNEXURE A/4 (colly)**.

9. That it is in these circumstances, that the Applicant has approached this Hon'ble Tribunal seeking directions for immediate stoppage of illegal sand mining, imposition of environmental compensation upon Respondent No.7, and initiation of action against the District Magistrate, Mining Officer, Jhargram and Regional Officer, WBPCB, Jhargram for collusion, negligence and dereliction of statutory duties, along with such other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case.
10. That the cause of action is continuing in nature as illegal sand mining is still being carried out, causing ongoing environmental harm and posing serious risks to the river ecosystem and local inhabitants.
11. That this Hon'ble Tribunal has jurisdiction to entertain and decide the present application under Sections 14 and 15 of the National Green Tribunal Act, 2010, as the matter involves substantial questions relating to the environment.

### **GROUND**

- A. Because the illegal mining activity of Respondent No.7 is in blatant violation of: (a) EIA Notification, 2006; (b) Sustainable Sand Mining Guidelines, 2016; (c) Enforcement & Monitoring Guidelines for Sand Mining, 2020; (d) Environment (Protection) Act, 1986; and (e) settled principles of environmental jurisprudence laid down by the Hon'ble National Green Tribunal and the Hon'ble Supreme Court of India.
- B. Because the Hon'ble Tribunal in *Balbir Sandhu & Ors. v. State of Uttar Pradesh & Anr. (2023)* has categorically held that sand mining without prior environmental clearance and in violation of prescribed guidelines is illegal and liable for strict action including imposition of environmental compensation.

- C. Because the Hon'ble Supreme Court *in State of Uttar Pradesh v. Gaurav Kumar (2025)* has reiterated that mining activities carried out in absence of mandatory environmental clearances are illegal ab initio and cannot be regularised post-facto, and that the 'Polluter Pays' principle must be strictly enforced.
- D. Because the Hon'ble National Green Tribunal *in Vijay Chandel v. State of Himachal Pradesh & Ors. (2025)* has further emphasized that illegal sand mining in riverbeds causes irreversible ecological damage and warrants immediate stoppage, assessment of environmental damage and recovery of compensation from violators.
- E. Because Respondent Nos. 2-West Bengal Pollution Control Board, Respondent Nos. 4- District Magistrate Jhargram, West Bengal and Respondent Nos. 6 - Directorate of Mines and Minerals have failed to discharge their statutory duties and have acted with gross negligence, collusion and dereliction of duty by allowing illegal mining operations to continue unabated despite clear absence of EC, CTE and CTO.
- F. Because despite absence of mandatory environmental permissions, the mining activity is being openly carried out at the site, leading to unchecked extraction of sand, degradation of river ecology, disturbance of natural flow, and depletion of surrounding environment.

### **LIMITATION**

The present Application is within the Limitation Period as the cause of action is recurring and still going on.

### **PRAYER**

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

(a) Direct the Respondent Authorities to immediately stop and prohibit illegal sand mining being carried out by Respondent No.7 at Sand Mining Block No. MIN\_JH\_29B, area 20.54 hectares, Mouza-Patina, District-Jhargram, West Bengal, in absence of Environment Clearance, Consent to Establish and Consent to Operate.

(b) Impose environmental compensation upon Respondent No.7 for carrying out illegal sand mining in violation of environmental laws and norms.

(c) Direct initiation of appropriate disciplinary and legal action against the District Magistrate, Jhargram, Mining Officer, Jhargram and Regional Officer, WBPCB, Jhargram for collusion, negligence and dereliction of statutory duties.

(d) Direct assessment of environmental damage caused to the Subarnarekha River and order restitution and restoration of the affected river stretch at the cost of the violators.

(e) Pass any other order(s) as this Hon'ble Tribunal may deem fit and proper in the interest of justice and environmental protection.

AND FOR THIS ACT OF KINDNESS, THE APPLICANT AS IN DUTY BOUND SHALL EVER PRAY.

13.01.2026

Kolkata

*Ranadhir Ghosh*

Applicant

*Dasipain*

Through

Counsel

Sl. NO.. 22

**BEFORE THE NATIONAL GREEN TRIBUNAL  
EASTERN ZONE BENCH, KOLKATA**

OA NO. \_\_\_\_\_/2026

**IN THE MATTER OF**

RANDHIR GHOSH

APPLICANT

VERSUS

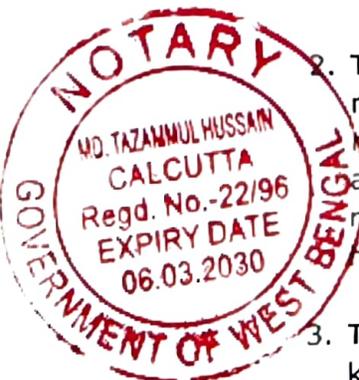
STATE OF WEST BENGAL & ORS

RESPONDENTS

**AFFIDAVIT**

I, Randhir Ghosh, S/o Kashi Nath Ghosh R/o 6/6 N.C. DAS.ROAD, Baranagar(m) Noapara, North 24 Parganas West Bengal- 700090 aged about 38 do hereby solemnly affirm and declare as under:

1. That I am the Applicant in the Original Application and well being and acquainted with facts and circumstances of the case and thus competent to swear this affidavit.
2. That the accompanying Original Application has been drafted by my counsel under my instructions and contents thereof have been read over and explained to me in my vernacular which are true and correct to my knowledge, the contents thereof may kindly be read as part and parcel to this affidavit also and not repeated herein.
3. The contents as stated above are true and correct to my knowledge and belief.



*Randhir Ghosh*

DEPONENT

Verification

It is verified at \_\_\_\_\_ on \_\_\_\_\_ that the contents of the present application are true and correct and nothing has been concealed therefrom.

**Solemnly affirmed and declared  
before me on Identification**

*[Signature]*

**M.D T. HUSSAIN** Notary  
City Civil Court  
Kolkata

**Regd. No. 22/96, Gov'. of W.B**

*Randhir Ghosh*  
DEPONENT

**Identified by me**  
*Amit Talukder*  
Advocate

**AMIT TALUKDER**  
Advocate  
Regd. No. WB/660/2005  
City Civil Court, Calcutta  
Kolkata-700001



09 JAN 2026

The screenshot shows the Parivesh portal interface. On the left, there is a sidebar with application icons for VSCode, Python, and others. The main content area is divided into two sections:

- Proposal Details:**
  - Proposal No.: SIA/WB/MIN/548961/2025
  - Single Window No.: SW/257680/2025
  - CAF No.: CAF/242681/2025
  - Project Name: Patina (MIN\_JH\_29B) Sand Mine
  - State: WEST BENGAL
  - Proposal For: Fresh ToR
  - Activity: 1(a) Mining of minerals
  - Sector: MIN
  - Application For: Application for ToR (Category A, B1, and B2 Violation)/EC (Category B2) - Form 1
  - Date of Submission: 15/09/2025
  - State File No.: 2N-128/2025(c)
- Proposal History/Timeline:**
  - ToR Granted: 31/12/2025 - 31/12/2025
  - Referred to SEIAA: 03/12/2025 - 31/12/2025
  - Referred to SEAC: 27/10/2025 - 18/10/2025
  - Processed by MS SEAC: 18/10/2025 - 27/10/2025
  - ADS Raised: 10/10/2025 - 18/10/2025
  - Processed by MS SEAC: 18/09/2025 - 18/10/2025
  - MS Verification Completed: 16/09/2025 - 16/09/2025
  - Examination Completed: 16/09/2025 - 16/09/2025
  - EDS raised: 12/09/2025 - 16/09/2025
  - Examination Completed: 06/09/2025 - 12/09/2025

Government of India | पारिवेश (PARIVESH) | पर्यावरण, वन और जलवायु परिवर्तन मंत्रालय (Ministry of Environment, Forest and Climate Change)

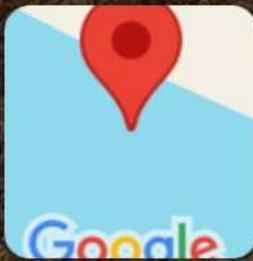
Total 1 No. of results found

### List of Proposals

[Download](#)

To view details click on Proposal Number

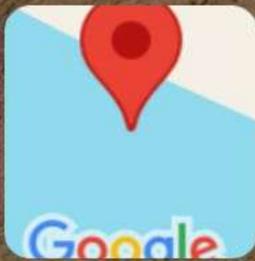
S. No.	Proposal No.	Clearance Details	Project Name	Location	User Agency	Other Details	Proposal Status
1	<a href="#">SIA/WB/MIN/548961/2025</a>	<b>Clearance Type:</b> Application for ToR (Category A, B1, and B2 Violation)/EC (Category B2) - Form 1 <b>S/W No.:</b> SW/257680/2025	Patina (MIN_JH_29B) Sand Mine	WEST BENGAL	WEST BENGAL MINERAL DEVELOPMENT AND TRADING CORPORATION LIMITED	<b>Category:</b> B1 <b>Sector:</b> Non-Coal Mining <b>Date of Submission:</b> 15/09/2025	ToR Granted



Upar Patina Rd, Patina, West  
Bengal 721506, India

22.17291° 87.01198°

10:20 AM 03/01/2026



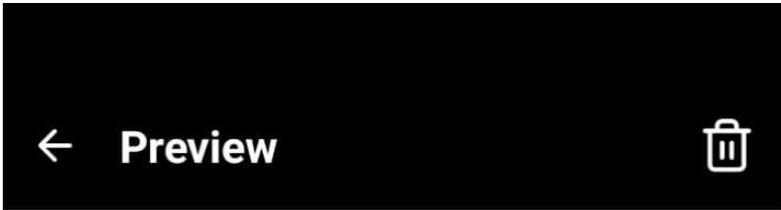
Upar Patina Rd, Patina, West Bengal 721506, India

22.17291° 87.01198°

10:46 AM 03/01/2026



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Gobra, West Bengal 721517, In...  
22.2055284° 87.0019717°  
10:18 AM 03/01/2026

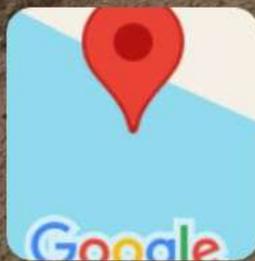




Upar Patina Rd, Patina, West Bengal 721506, India

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10:46 AM 03/01/2026



Upar Patina Rd, Patina, West  
Bengal 721506, India

22.17291° 87.01198°

10:46 AM 03/01/2026

WBMDTCL

### Geo-reference co-ordinate of the sand block



## Road E-Challan for sand / riverbed materials Transport

E-Challan No. : 2962897/T/25-26/101220251057/PS  
 Issue Date : 10/12/2025 07:11 AM  
 Validity Till : 10/12/2025 07:11 PM  
 Quantity of Sand : 700.00 cft (Seven Hundred cft)  
 Vehicle No. : WB495923 (16 Wheels)



## PERMISSION HOLDER DETAILS

PERMISSION : 2056/SS2025  
 HOLDER Id  
 Mouza : Patina  
 GP/Ward : PATINA  
 Sub-Division : JHARGRAM  
 Police Station : Nayagram  
 District : JHARGRAM  
 Name of the : Greego Drive Pvt Ltd  
 Permission Holder  
 Mobile No : 9641786678  
 Address : Midnapur

## VEHICLE &amp; DESTINATION DETAILS

Name of Purchaser : B JANA  
 Mobile No. : 7001310196  
 Police Station : North Port  
 District : KOLKATA  
 State : West Bengal  
 Vehicle Type : 16 Wheels  
 Registration No. : WB495923  
 Capacity (in Kg) : 47500

Note :

1) Prior approval was accorded by : ADM and DL & LRO, JHARGRAM vide permit no. 10662/T/25-26/031225085510/PT.

2) Loaded vehicle must depart for its destination within 30 minutes from issuance of this E-challan. To verify authenticity of the E-challan, please scan above scan QR Code using smart phone.

3) This is a system generated document and does not require any signature.

4) Self Certification by Lessee : I/We (Permission/Q.P.) hereby declare that the above statements are correct and complete to best of my/our knowledge and belief. Greego Drive Pvt Ltd

10.12.25  
 Mr. G.22. [Signature]

Issued by  
 Greego Drive Pvt Ltd  
 PERMISSION HOLDER Id 2056/SS2025

\*\* On QR code scanning pl check that the website address bar shows mdctcl.wb.gov.in as that is the only genuine website of the government.

To

The Chairman,

State Level Environment Impact Assessment Authority (SEIAA)

Prani Sampad Bhavan, 5th Floor, LB Block, Sector III, Salt Lake, Kolkata - 700106,

West Bengal

Subject: Complaint regarding illegal mining operations being carried out by Greego Drive Pvt. Ltd. in Mouza–Patina, District Jhargram, P.S.–Nayagram, West Bengal without mandatory statutory clearances

Respected Sir/Madam,

I most respectfully submit this complaint for your kind consideration and immediate intervention with regard to illegal mining activities being carried out in Mouza–Patina, District Jhargram, Police Station–Nayagram, West Bengal by the leaseholder Greego Drive Pvt. Ltd., holding mining lease permission ID 2056/SS2025.

It has come to my knowledge that the aforesaid leaseholder is actively conducting mining operations in the above-mentioned area without obtaining the mandatory Environmental Clearance (EC), Consent to Establish (CTE), and Consent to Operate (CTO) from the competent statutory authorities. The commencement and continuation of mining activities without these clearances is in clear violation of the Environment (Protection) Act, 1986, the EIA Notification, 2006, as well as the guidelines issued for sustainable sand/minor mineral mining.

It is a settled legal position that obtaining Environmental Clearance along with Consent to Establish and Consent to Operate is a mandatory pre-condition prior to commencement of any mining activity. Mining carried out in the absence of these statutory approvals is illegal, unauthorized, and environmentally destructive, causing irreversible damage to the local ecology, groundwater regime, riverine system, and public health of the surrounding villages.

The continued operation of such illegal mining not only defeats the object of environmental protection laws but also amounts to disregard of regulatory oversight

and sustainable mining norms. Allowing such activities to continue would set a dangerous precedent and lead to further environmental degradation in the region.

In view of the above facts and circumstances, I humbly request your office to immediately inquire into the legality of the mining operations being carried out by Greego Drive Pvt. Ltd. in Mouza-Patina. Verify the status of Environmental Clearance, Consent to Establish, and Consent to Operate for the said mining lease. Direct immediate stoppage of all mining activities being carried out without statutory clearances and also to initiate appropriate legal and departmental action against the leaseholder in accordance with law.

This complaint is made in the interest of environmental protection, rule of law, and public welfare. I request your office to treat this matter as urgent and take necessary action at the earliest.

I shall be grateful for your prompt response and appropriate intervention.

Yours faithfully,



Ranadhir Ghosh

6/6, N.C.Das.Road  
Baranagar(m) Noapara N(24)PGS  
West Bengal-700090

Mob: 9903179328

Email ID: rdg1806@gmail.com

Date: 18.12.2025

Kolkata

To

The Chairman,

West Bengal Pollution Control Board

Paribesh Bhawan, 10A, Block-LA, Sector-III, Bidhannagar, Kolkata-700 106,

West Bengal

**Subject: Complaint regarding illegal mining operations being carried out by Greego Drive Pvt. Ltd. in Mouza–Patina, District Jhargram, P.S.–Nayagram, West Bengal without mandatory statutory clearances**

Respected Sir/Madam,

I most respectfully submit this complaint for your kind consideration and immediate intervention with regard to illegal mining activities being carried out in Mouza–Patina, District Jhargram, Police Station–Nayagram, West Bengal by the leaseholder Greego Drive Pvt. Ltd., holding mining lease permission ID 2056/SS2025.

It has come to my knowledge that the aforesaid leaseholder is actively conducting mining operations in the above-mentioned area without obtaining the mandatory Environmental Clearance (EC), Consent to Establish (CTE), and Consent to Operate (CTO) from the competent statutory authorities. The commencement and continuation of mining activities without these clearances is in clear violation of the Environment (Protection) Act, 1986, the EIA Notification, 2006, as well as the guidelines issued for sustainable sand/minor mineral mining.

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Yours faithfully,



Ranadhir Ghosh

6/6, N.C.Das.Road  
Baranagar(m) Noapara N(24)PGS  
West Bengal-700090

Mob: 9903179328

Email ID: rdg1806@gmail.com

Date: 18.12.2025  
Kolkata

To

The Managing Director

West Bengal Mineral Development & Trading Corporation Limited

3rd Floor, DJ-10, WBIIDC Building DJ Block, Sector II,

Salt Lake City Kolkata - 700091

West Bengal

Subject: Complaint regarding illegal mining operations being carried out by Greego Drive Pvt. Ltd. in Mouza–Patina, District Jhargram, P.S.–Nayagram, West Bengal without mandatory statutory clearances

Respected Sir/Madam,

I most respectfully submit this complaint for your kind consideration and immediate intervention with regard to illegal mining activities being carried out in Mouza–Patina, District Jhargram, Police Station–Nayagram, West Bengal by the leaseholder Greego Drive Pvt. Ltd., holding mining lease permission ID 2056/SS2025.

It has come to my knowledge that the aforesaid leaseholder is actively conducting mining operations in the above-mentioned area without obtaining the mandatory Environmental Clearance (EC), Consent to Establish (CTE), and Consent to Operate (CTO) from the competent statutory authorities. The commencement and continuation of mining activities without these clearances is in clear violation of the Environment (Protection) Act, 1986, the EIA Notification, 2006, as well as the guidelines issued for sustainable sand/minor mineral mining.

It is a settled legal position that obtaining Environmental Clearance along with Consent to Establish and Consent to Operate is a mandatory pre-condition prior to commencement of any mining activity. Mining carried out in the absence of these statutory approvals is illegal, unauthorized, and environmentally destructive, causing irreversible damage to the local ecology, groundwater regime, riverine system, and public health of the surrounding villages.

The continued operation of such illegal mining not only defeats the object of environmental protection laws but also amounts to disregard of regulatory oversight and sustainable mining norms. Allowing such activities to continue would set a dangerous precedent and lead to further environmental degradation in the region.

In view of the above facts and circumstances, I humbly request your office to immediately inquire into the legality of the mining operations being carried out by Greego Drive Pvt. Ltd. in Mouza-Patina. Verify the status of Environmental Clearance, Consent to Establish, and Consent to Operate for the said mining lease. Direct immediate stoppage of all mining activities being carried out without statutory clearances and also to initiate appropriate legal and departmental action against the leaseholder in accordance with law.

This complaint is made in the interest of environmental protection, rule of law, and public welfare. I request your office to treat this matter as urgent and take necessary action at the earliest.

I shall be grateful for your prompt response and appropriate intervention.

Yours faithfully,



Ranadhir Ghosh

6/6, N.C.Das.Road  
Baranagar(m) Noapara N(24)PGS  
West Bengal-700090

Mob: 9903179328

Email ID: [rdg1806@gmail.com](mailto:rdg1806@gmail.com)

Date: 18.12.2025

Kolkata

To

The Director,

Directorate of Mines and Minerals,

4, Abanindranath Tagore Sarani, 2nd Floor, Kolkata – 700 016

West Bengal

Subject: Complaint regarding illegal mining operations being carried out by Greego Drive Pvt. Ltd. in Mouza–Patina, District Jhargram, P.S.–Nayagram, West Bengal without mandatory statutory clearances

Respected Sir/Madam,

I most respectfully submit this complaint for your kind consideration and immediate intervention with regard to illegal mining activities being carried out in Mouza–Patina, District Jhargram, Police Station–Nayagram, West Bengal by the leaseholder Greego Drive Pvt. Ltd., holding mining lease permission ID 2056/SS2025.

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Yours faithfully,

*Ranadhir Ghosh*

Ranadhir Ghosh

6/6, N.C.Das.Road  
Baranagar(m) Noapara N(24)PGS  
West Bengal-700090

Mob: 9903179328

Email ID: [rdg1806@gmail.com](mailto:rdg1806@gmail.com)

Date: 18.12.2025  
Kolkata

To

The District Magistrate, Jhargram  
Jhargram Rajbati, P.O. Jhargram,  
Dist. Jhargram, West Bengal - 721514

Subject: Complaint regarding illegal mining operations being carried out by Greego Drive Pvt. Ltd. in Mouza–Patina, District Jhargram, P.S.–Nayagram, West Bengal without mandatory statutory clearances

Respected Sir/Madam,

I most respectfully submit this complaint for your kind consideration and immediate intervention with regard to illegal mining activities being carried out in Mouza–Patina, District Jhargram, Police Station–Nayagram, West Bengal by the leaseholder Greego Drive Pvt. Ltd., holding mining lease permission ID 2056/SS2025.

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It is a settled legal position that obtaining Environmental Clearance along with Consent to Establish and Consent to Operate is a mandatory pre-condition prior to commencement of any mining activity. Mining carried out in the absence of these statutory approvals is illegal, unauthorized, and environmentally destructive, causing irreversible damage to the local ecology, groundwater regime, riverine system, and public health of the surrounding villages.

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Ranadhir Ghosh

6/6, N.C.Das.Road  
Baranagar(m) Noapara N(24)PGS  
West Bengal-700090

Mob: 9903179328

Email ID: [rdg1806@gmail.com](mailto:rdg1806@gmail.com)

Date: 18.12.2025  
Kolkata



INDIA SPEED POST DOCUMENT



EW292679975IN

Dely Office & Pincode:Sech Bhawan SO(700091)

Booking Office: Park Street HO (700016)

Counter No. 2, 20-12-2025 12:39:54

GSTNo.19AAAGP0731J1ZB BkgRefID: 3336000920122554647

ChargedVeigh(gms):45 Phy.Wt(gms):45 Vol.Wt(gms):NA(L:NA B NA H:NA)

AmountPaid:23.00(Base Tariff-Rs.19 Tax-Rs.4) (CGST:2.00

SGST:2.00 )

ModeofPayment:Cash

Sender	Receiver
<b>RANADHIR GHOSH</b> Mobile No.9903179328 6/6 N C DAS ROAD  24 PARAGANAS NORTH-700090	<b>THE MANAGING DIRECTOR</b> Mobile No.1234567890 WEST BENGAL MINERAL DE  24 PARAGANAS NORTH-700091

Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666888 : IVR NO : 69872926799

In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>

Go Green!!! Opt for eReceipts, ePOD

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20-12-2025 12:42:20



Dely Office & Pincode: Bidhan Nagar IB Market SO(700106)	
Booking Office: Park Street HO (700016)	
Counter No. 2. 20-12-2025 12:39:05	
GSTNo. 19AAAGP0731J1ZB BkgRefID: 3336000920122554647	
Charged: Weight(gms): 45 Phy. Wt(gms): 45 Vol. Wt(gms): NA (L: NA B: NA H: NA)	
Amount Paid: 23.00 (Base Tariff-Rs. 19 Tax-Rs. 4) (CGST: 2.00 SGST 2.00)	
Mode of Payment: Cash	
Sender	Receiver
RANADHIR GHOSH Mobile No. 9903179328 6/6 N C DAS ROAD  24 PARAGANAS NORTH-700090	THE CHAIRMAN Mobile No. 1234567890 WEST BENGAL POLLUTION  24 PARAGANAS NORTH-700106

Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666868 : IVR NO : 69872926799  
 In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>  
 Go Green!!! Opt for eReceipts, ePOD  
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 20-12-2025 12:42:09



INLAND SPEED POST DOCUMENT



EW292680090IN

Duty Office & Pincode: Park Street HO(700016)	
Booking Office: Park Street HO (700016)	
Counter No. 2, 20-12-2025 12:40:38	
GSTNo.19AAAGP0731J1ZB BkgRefID: 3336000920122554647	
Charged Weight(gms):45 Phy.Wt(gms):45 Vol.Wt(gms):NA(L:NA B:NA H:NA)	
Amount Paid:23.00(Base Tariff-Rs.19 Tax-Rs.4) (CGST:2.00 SGST:2.00 )	
Mode of Payment: Cash	
Sender	Receiver
RANADHIR GHOSH Mobile No.9903179328 6/6 N C DAS ROAD	THE DIRECTOR Mobile No.1234567890 DIRECTORATE OF MINES
24 PARAGANAS NORTH-700090	KOLKATA-700016

Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666868 : IVR NO : 69872926800  
 In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>  
 Go Green!!! Opt for eReceipts, ePOD  
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 20-12-2025 12:42:31



INDIA SPEED POST DOCUMENT



EW292680214IN

Delivery Office & Pincode: Sevayatan SO(721514)	
Booking Office: Park Street HO (700016)	
Counter No. 2, 20-12-2025 12:41:30	
GST No. 19AAAGP0731J1ZB BkgRefID: 3336000920122554647	
Charged Weight(gms): 45 Phy. Wt(gms): 45 Vol. Wt(gms): NA (L: NA B: NA H: NA)	
Amount Paid: 55.00 (Base Tariff-Rs. 47 Tax-Rs. 8) (CGST: 4.00 SGST: 4.00)	
Mode of Payment: Cash	
Sender	Receiver
RANADHIR GHOSH Mobile No. 9903179328 6/6 N C DAS ROAD  24 PARAGANAS NORTH-700090	THE DISTRICT MAGISTRATE Mobile No. 1234567890 JHARGRAM RAJBARI  JHARGRAM-721514

Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666868 : IVR NO : 69872926802

In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>

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20-12-2025 12:42:41



Dely Office & Pincode: Bidhan Nagar IB Market SO(700106)

Booking Office: Park Street HO (700016)

Counter No. 2. 20-12-2025 12:38.28

GST No. 19AAAGP0731J1ZB Bkg Ref ID: 3336000920122554647

Charged Weight(gms): 45 Phy. Wt(gms): 45 Vol. Wt(gms): NA(L: NA B NA H: NA)

Amount Paid 23.00(Base Tariff-Rs.19 Tax-Rs.4) (CGST:2.00

SGST 2.00 )

Mode of Payment Cash

Sender	Receiver
RANADHIR GHOSH Mobile No.9903179328 6/6 N C DAS ROAD  24 PARAGANAS NORTH-700090	THE CHAIRMAN Mobile No.1234567890 STATE LEVEL ENVIRONMEN  24 PARAGANAS NORTH-700106

Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666868 : IVR NO : 69872926802

In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>

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20-12-2025 12:41:58



**Department of Posts**  
**Government of India**  
Ministry of Communications

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## Consignment/MO Tracking Report

Consignment/MO Number: EW292680090IN

Article Number:

EW292680090IN

Article Type:

SP\_INLAND\_DOC

Booked At:

Park Street HO

Booked On:

20/12/2025, 12:41:53

Destination:

Park Street HO

Origin Pincode:

700016

Delivered On:

22/12/2025, 14:49:17

Destination Pincode:

700016

Event	Date	Time	Office
Item Booked	20/12/2025	12:41:53	Park Street HO
Item Received	22/12/2025	07:55:43	Park Street DC
Item Invoiced	22/12/2025	10:15:18	Park Street DC
Item Delivered	22/12/2025	14:49:17	Park Street DC



**Department of Posts**  
**Government of India**  
Ministry of Communications

Generated through Indiapost website on: 13/1/2026, 1:43:54 pm

## Consignment/MO Tracking Report

Consignment/MO Number: EW292679967IN

Article Number:

EW292679967IN

Article Type:

SP\_INLAND\_DOC

Booked At:

Park Street HO

Booked On:

20/12/2025, 12:41:53

Destination:

Bidhan Nagar IB Market SO

Origin Pincode:

700016

Delivered On:

22/12/2025, 19:35:24

Destination Pincode:

700106

Event	Date	Time	Office
Item Booked	20/12/2025	12:41:53	Park Street HO
Item Bagged	20/12/2025	16:20:05	Park Street HO
Item Dispatched	20/12/2025	16:27:22	Park Street HO
Item Dispatched	20/12/2025	19:57:07	KOL AP TMO
Item Received	20/12/2025	21:35:29	Kolkata NSH
Item Dispatched	22/12/2025	05:36:25	KOL AP TMO
Item Received	22/12/2025	10:18:34	Sech Bhawan IDC
Item Invoiced	22/12/2025	11:34:44	Sech Bhawan IDC
Item Delivered	22/12/2025	19:35:24	Sech Bhawan IDC



**Department of Posts**  
**Government of India**  
Ministry of Communications

Generated through Indiapost website on: 13/1/2026, 1:42:43 pm

## Consignment/MO Tracking Report

Consignment/MO Number: **EW292680205IN**

Article Number:

EW292680205IN

Article Type:

SP\_INLAND\_DOC

Booked At:

Park Street HO

Booked On:

20/12/2025, 12:41:53

Destination:

Bidhan Nagar IB Market SO

Origin Pincode:

700016

Delivered On:

22/12/2025, 19:35:24

Destination Pincode:

700106

Event	Date	Time	Office
Item Booked	20/12/2025	12:41:53	Park Street HO
Item Bagged	20/12/2025	16:20:05	Park Street HO
Item Dispatched	20/12/2025	16:27:22	Park Street HO
Item Dispatched	20/12/2025	19:57:07	KOL AP TMO
Item Received	20/12/2025	21:35:29	Kolkata NSH
Item Dispatched	22/12/2025	05:36:25	KOL AP TMO
Item Received	22/12/2025	10:18:34	Sech Bhawan IDC
Item Invoiced	22/12/2025	11:39:20	Sech Bhawan IDC
Item Delivered	22/12/2025	19:35:24	Sech Bhawan IDC



**Department of Posts**  
**Government of India**  
Ministry of Communications

Generated through Indiapost website on: 13/1/2026, 1:39:44 pm

## Consignment/MO Tracking Report

Consignment/MO Number: EW292680214IN

Article Number:

EW292680214IN

Article Type:

SP\_INLAND\_DOC

Booked At:

Park Street HO

Booked On:

20/12/2025, 12:41:53

Destination:

Sevayatan SO

Origin Pincode:

700016

Delivered On:

23/12/2025, 15:23:22

Destination Pincode:

721514

Event	Date	Time	Office
Item Booked	20/12/2025	12:41:53	Park Street HO
Item Bagged	20/12/2025	16:09:04	Park Street HO
Item Dispatched	20/12/2025	16:27:22	Park Street HO
Item Dispatched	20/12/2025	19:57:06	KOL AP TMO
Item Received	20/12/2025	20:35:41	Kolkata NSH
Item Dispatched	21/12/2025	02:00:45	KOL AP TMO
Item Dispatched	21/12/2025	12:21:54	MA Kharagpur RMS TMO
Item Received	21/12/2025	21:06:22	Kharagpur NSH
Item Bagged	22/12/2025	03:14:43	Kharagpur NSH
Item Dispatched	22/12/2025	03:44:01	Kharagpur NSH
Item Dispatched	22/12/2025	04:20:55	MA Kharagpur RMS TMO
Item Received	22/12/2025	12:47:21	Sevayatan SO
Missent - Redirected to Jhargram HO	22/12/2025	14:59:23	Sevayatan SO

Event	Date	Time	Office
Item Bagged	22/12/2025	15:27:05	Sevayatan SO
Item Dispatched	22/12/2025	15:35:59	Sevayatan SO
Item Dispatched	22/12/2025	19:53:54	MA Kharagpur RMS TMO
Item Received	22/12/2025	20:08:43	Kharagpur NSH
Item Bagged	23/12/2025	03:16:36	Kharagpur NSH
Item Dispatched	23/12/2025	04:06:14	Kharagpur NSH
Item Dispatched	23/12/2025	04:57:07	MA Kharagpur RMS TMO
Item Received	23/12/2025	09:50:50	Jhargram HO
Item Invoiced	23/12/2025	10:33:13	Jhargram HO
Item Delivered	23/12/2025	15:23:22	Jhargram HO



**Department of Posts**  
**Government of India**  
Ministry of Communications

Generated through Indiapost website on: 13/1/2026, 1:45:27 pm

## Consignment/MO Tracking Report

Consignment/MO Number: EW292679975IN

Article Number:

EW292679975IN

Article Type:

SP\_INLAND\_DOC

Booked At:

Park Street HO

Booked On:

20/12/2025, 12:41:53

Destination:

Sech Bhawan SO

Origin Pincode:

700016

Delivered On:

22/12/2025, 16:40:47

Destination Pincode:

700091

Event	Date	Time	Office
Item Booked	20/12/2025	12:41:53	Park Street HO
Item Bagged	20/12/2025	16:20:05	Park Street HO
Item Dispatched	20/12/2025	16:27:22	Park Street HO
Item Dispatched	20/12/2025	19:57:07	KOL AP TMO
Item Received	20/12/2025	21:35:29	Kolkata NSH
Item Dispatched	22/12/2025	05:36:25	KOL AP TMO
Item Received	22/12/2025	09:37:04	Sech Bhawan IDC
Item Invoiced	22/12/2025	11:40:54	Sech Bhawan IDC
Item Delivered	22/12/2025	16:40:47	Sech Bhawan IDC

## VAKALATNAMA

BEFORE NATIONAL GREEN TRIBUNAL, EASTERN ZONE BENCH, KOLKATA

OA No. \_\_\_\_\_/2026

In the matter of:

Randhir Ghosh

Applicant

Versus

State of West Bengal &amp; Ors

Respondents

KNOW ALL to whom these present shall come that I, Randhir Ghosh s/o Kashi Nath Ghosh 6/6 N.C.DAS. ROAD Baranagar(m) Noapara, North24 Parganas West Bengal-700090

Do hereby appoint

**RAHUL KHURANA Adv & HASIL JAIN & Ishan Sharma**  
**Adv(D/2183/2008) (D/2880/2013) (D/11097/2025)**  
**Off: A-174A ,Defence Colony New Delhi-110034**  
 9811894060, 7838707338,7300993052

rkhuranalegal@gmail.com, advjain25@gmail.com ishansharma379@gmail.com

(herein after called the advocate/s) to be my/our Advocate in the above-noted case authorised him:-

To act appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each court by me/us.

To sign file verify and present pleadings, appeals cross-objections or petitions for executive on review, revision, withdrawal, compromise or other petitions or affidavits of other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages.

To file and take back documents including original documents, to admit and/or deny the documents of opposite party.

To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case. To take execution proceedings.

And I/we undertake that I/we or my/our duly authorised agent would appear in the Court on all hearings and will inform the Advocates for appearance when the case is called.

And I/we the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/we hereby agree that once the fee is paid, I/we will not be entitled for the refund of the same in any case whatsoever. If the case lasts for more than three years, the advocate shall be entitled for additional fee equivalent to half of the agreed fee for every addition three years, or part thereof.

IN WITNESS WHEREOF I/we do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this \_\_\_\_\_ day January 2026

Accepted subject to the terms of fees.

Advocate

*Ranadhis Ghosh*  
Clients

*R Khurana*

*Hasil Jain*

*Ishant Sharma*

