

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

**I.A. No. 7 of 2026
IN
Original Application No. 83 of 2025**

IN THE MATTER OF:

Satam Patnaik

...Applicant

Versus

State of Odisha & Ors.

...Respondents

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FILED BY

Thirumal

ADVOCATE

FILED BY
Jindal
Advocate

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

I.A. No. 7 of 2026
IN
Original Application No. 83 of 2025

IN THE MATTER OF:

Satam Patnaik	Versus	...Applicant
State of Odisha & Ors.		...Respondents

REPLY ON BEHALF OF JINDAL STEEL LIMITED, RESPONDENT NO. 2

TO THE APPLICATION FILED BY THE APPLICANT

MOST RESPECTFULLY SHOWETH:

1. The present OA No. 83 of 2025 was filed by the Applicant on 07.04.2025 before this Hon'ble Tribunal alleging illegal and unauthorized mining activities carried out by the Respondent No. 2 in the Jamunda Jungle Mines, situated in Jamunda Jungle Revenue Village, under Badakerjang Gram Panchayat, Banarpal Tehsil, Angul District, Odisha ('Subject Land'). Further, the Applicant through the present Original Application ('OA') is challenging the alleged violation of the Forest Conservation Act, 1980, as well as applicable environmental and mining laws by Jindal Steel Limited (formerly known as Jindal Steel and Power Limited), Respondent No. 2 ('Jindal Steel') in the Subject Land.
2. It is submitted that Jindal Steel has already filed a detailed Counter Affidavit to the present OA. The said Counter Affidavit exhaustively answers each and every allegation raised by the Applicant in the OA and the present application.

It is submitted that Jindal Steel reiterates and relies upon the said Counter Affidavit filed in the present OA along with all annexures thereto, which are



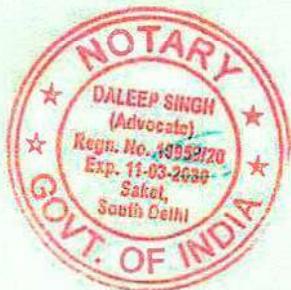
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already on record and may be read as part and parcel of the present reply. The same are not repeated herein for the sake of brevity.

4. Jindal Steel denies all the contentions, allegations and averments made in the present application filed by the Applicant unless specifically admitted hereinbelow. Nothing stated in the present reply be construed to have been admitted by Jindal Steel for lack of specific denial. Jindal Steel is filing the limited reply without para-wise reply and reserves its right to file a further reply in case required at a later stage.
5. At the very outset, it is submitted that the present Application for stay filed by the Applicant is wholly misconceived, not maintainable in law, and liable to be dismissed *in limine*. The present Application is devoid of merit and amounts to a clear abuse of the process of law. It neither discloses any fresh cause of action nor points to any supervening circumstance or environmental impact warranting interim intervention by this Hon'ble Tribunal. The present application merely reiterates allegations already raised in the OA and comprehensively responded to by Jindal Steel in its Counter Affidavit, and is therefore an impermissible attempt to secure, through interlocutory proceedings, relief that is substantively final in nature.
6. The present application filed by the Applicant is a clear afterthought, devoid of any real urgency or *bona fide*, and is intended to secure, at the interlocutory stage, relief which is in substance identical to the final relief sought in the present OA.
7. It is important to note that OA was filed on 07.04.2025. For a substantial period thereafter, the Applicant did not seek any interim restraint, nor did any



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statutory authority record any imminent or irreversible environmental damage caused by Jindal Steel.

8. It is already on record that the Sairat source in the Subject Land stood extinguished in 2012, the assessed royalty was deposited, the quarry lease proposal was cancelled, and the land was thereafter processed for allotment to IDCO for industrial purposes. No mining lease has ever been granted in favour of Respondent No. 2, and accordingly, no mining or any other activity has been undertaken by Jindal Steel on the Subject land. Therefore, the allegation of illegal mining is factually misconceived and incapable of sustaining any interim order.
9. The present Application does not disclose any prima facie environmental violation. The Applicant relies solely on representations and photographs which are inconsistent and unreliable. The GPS coordinates appearing on the photographs dated 20.12.2025 and 24.12.2025 are materially different from each other, and do not establish that the alleged activities were undertaken in the Subject Land.
10. In fact, the coordinates displayed in the said photographs indicate different geo-locations than the Subject Land, thereby rendering the photographic evidence doubtful and incapable of establishing any activity on the Subject Land. The photographs with GPS coordinates and timestamps annexed by the Applicant are of a different parcel of land belonging to Jindal Steel, which is not disputed and/or part of the alleged present issue.
11. In this regard, it is submitted that the Applicant has neither produced a certified survey map, nor correlated the GPS coordinates with revenue maps, forest maps, or cadastral boundaries of the alleged Subject Land. In absence of such



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correlation, mere photographs with floating coordinates cannot establish that any activity took place within the disputed parcel.

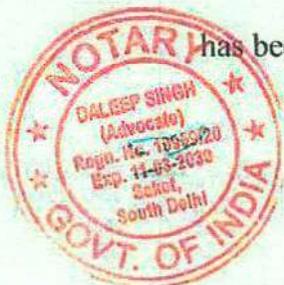
12. It is an admitted position on record, that no mining lease has ever been granted in favour of Jindal Steel with regards to the Subject Land. Further, Jindal Steel is not in possession of the Subject Land. The entire process originated from Memorandum of Understanding ('MoU') dated 03.11.2005 between Jindal Steel and Respondent No. 1 for setting up a 6 MTPA steel plant and a 900 MW captive power plant.
13. As already placed on record in Jindal Steel's Counter Affidavit, the Applicant has initiated proceedings before the Odisha Human Rights Commission in Case No. 1639 of 2025, and further a permanent injunction has also been granted by the learned Civil Judge, Angul, in Civil Suit No. 60 of 2022, restraining the Applicant from interfering with the lawful activities of Respondent No. 2.
14. Moreover, FIR Nos. 0111/2024 and 0370/2024 have also been registered against the Applicant in connection with incidents affecting law and order near the project site, further evidencing the disruptive impact of the Applicant's activities.
15. Therefore, the present Application is clearly in continuation of the Applicant's pattern of obstruction and is invoking the interim jurisdiction of this Hon'ble Tribunal with *mala fide* intent as a pressure tactic against Jindal Steel.
16. It is submitted that the assertions made by the Applicant herein are wholly unsupported by any reliable or documentary evidence. The Applicant has not placed on record any inspection report of any statutory authority, expert or scientific study, to substantiate the relief sought.



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Thirasingh
Advocate

17. The allegations of the Applicant are premised on the assertion that the present matter pertains to the grant of mining lease, which is wholly misplaced and nothing but an attempt to mislead this Hon'ble Tribunal. It is submitted that it is not a case of grant of mining lease but a case of sanctioning of a lease for government land for the purpose of setting up an industry.
18. It is submitted that no illegal, forceful, or unauthorized activity has been carried out by Jindal Steel in the Subject Land, as falsely alleged by the Applicant. The present Application is a clear abuse of the process of law, filed with the sole intention of obstructing lawful industrial operations being carried out strictly in accordance with statutory approvals and directions of competent authorities.
19. The photographic evidence neither establishes illegal excavation, nor demonstrates violation of any environmental clearance or statutory condition. It is submitted that photographs with GPS coordinates and timestamps annexed by the Applicant are of a different parcel of land belonging to Jindal Steel only. The said photographs and coordinates do not pertain to the Subject Land.
20. It is submitted that the allegation regarding excavation on 18.12.2025 is false, misleading, and denied. In this regard, it is submitted that Jindal Steel has only undertaken site-level preparatory and safety-related works, including clearing of loose debris and maintenance of existing access paths in the adjoining area to the Subject Land in accordance with law. It is further submitted that no mining, excavation, extraction of minor mineral or any other alleged activity has been undertaken by Jindal Steel on the Subject Land.

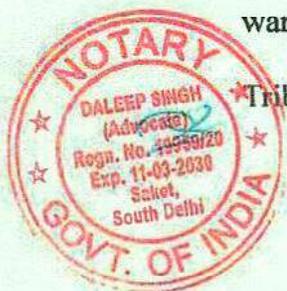


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Shirvanf
Advocate

21. It is important to note that no forest land or protected area has been disturbed by Jindal Steel. It is further submitted that the Applicant has failed to place on record any expert report, inspection note, or determination by a competent authority establishing that the alleged activity constitutes illegal mining or environmental violation.
22. The alleged representation dated 24.12.2025 relied upon by the Applicant is unilateral in nature and does not record any finding of illegality by any competent authority. No notice to stop work or prohibition has ever been issued against Jindal Steel in respect of the alleged activities.
23. It is further submitted that Jindal Steel has complied with all the legal formalities and procedures as prescribed under law, contrary to the erroneous allegations made by the Applicants.
24. In view thereof, it is submitted that the Applicant seeks, under the guise of interim relief, what is effectively the final relief claimed in the OA. The Applicant has failed to establish any imminent or irreversible environmental injury. Grant of an interim stay in absence of demonstrated environmental damage would cause disproportionate prejudice, financial loss, and disruption of lawful activity.
25. The balance of convenience lies in favour of Jindal Steel and is entirely against the Applicant. Grant of such a blanket restraint by allowing the present Application would cause grave prejudice to Jindal Steel.
26. It is also submitted that the present Application does not disclose any independent or emergent substantial question relating to environment warranting urgent intervention under Sections 14 or 15 of the National Green

Tribunal Act, 2010.



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FILED BY
Dhivraj
Advocate

27. In any event, the relief sought in the present Application is unreasonably and wholly disproportionate. Without identifying any specific act, location, or activity causing alleged harm, the Applicant seeks a blanket restraint on all project-related activities in the Jamunda Jungle Mines area, which are being undertaken in accordance with law.

28. It is reiterated that the present Application being devoid of merit, unsupported by documents, not maintainable, and construing an abuse of the process of this Hon'ble Tribunal is liable to be dismissed.

29. In view of the foregoing, the present Application is wholly speculative, unsupported by cogent evidence, and bereft of any *prima facie* material demonstrating environmental or statutory violation. The Applicant has failed to establish the existence of a mining lease, failed to correlate the alleged activity with the Subject Land, and failed to produce any determination by a competent authority recording illegality. Further, the photographs relied upon are inconsistent in location and are not of the Subject Land.

30. The present application therefore ought to be dismissed *in limine*, with costs.

Dhivraj Dwivedi
D/4969/2016
I Identify The Deponent Who Has
Signed/Put T.I. In my Presence



ATTESTED

DALEEP SINGH ADVOCATE
NOTARY DELHI-R-19959
GOVERNMENT OF INDIA
SUPREME COURT OF INDIA
COMPOUND NEW DELHI
REGISTER Pg./Sl. No. 49



ATTESTED

NOTARY PUBLIC

16 MAR 2026

X

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

I.A. No. 7 of 2026
IN
Original Application No. 83 of 2025

IN THE MATTER OF:

Satam Patnaik ...Applicant
Versus
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AFFIDAVIT

I, Rajan Anand, son of B.K. Anand, aged about 54 years, Authorized Signatory of Jindal Steel Limited, having its registered office at Jindal Centre, 12, Bhikaji Cama Place, New Delhi - 110066, do hereby solemnly affirm and state as follows:-

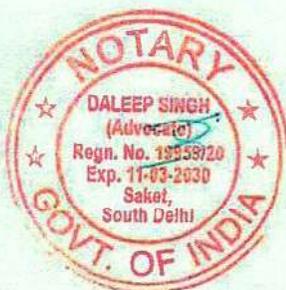
1. I am the Authorized representative of the Respondent No.2 Company, Jindal Steel Limited (formerly known as Jindal Steel & Power Limited) and being fully conversant with the facts and circumstances of the present case I am competent to depose this affidavit on behalf of the Respondent No.2.
2. That the contents of the present reply have been drafted under my instructions by my counsel and the same have been read out to me and understood by me. I reaffirm that the contents in the present reply are true statement of facts to the best of my knowledge.

VERIFICATION

Verified that the contents of Paragraph 1 to 2 of the present affidavit are true and correct to the best of my knowledge and as derived from the official record. No part of the same is false or misleading and nothing material has been concealed therefrom.

18 MAR 2026

Verified at _____ on this _____ day of _____, 2026.



ATTESTED
DALEEP SINGH ADVOCATE
NOTARY DELHI-R-19959
GOVERNMENT OF INDIA
SUPREME COURT OF INDIA
COMPOUND NEW DELHI
REGISTER Pg./Sl. No. 49

ATTESTED

NOTARY PUBLIC

Dinesh Mohan
21/4/2026
I identify the Deponent who has signed/put T.I. in my Presence



Sandip Agarwal & Co. <mailsandipagarwal@gmail.com>

Re: O.A. No. 83 of 2025 || Service of Counter Affidavit to IA No. 7 of 2026

1 message

Sandip Agarwal & Co. <mailsandipagarwal@gmail.com>

Tue, Mar 17, 2026 at 11:37 AM

To: Satam Patnaik <satam.patnaik@gmail.com>, csori@nic.in, 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

SERVICE THROUGH E-MAIL

To,

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2. State of Odisha, through Chief Secretary of Odisha,
LokaSeva Bhavan, Bhubaneswar – 751001.
Email – csori@nic.in
3. District Collector, Angul
At/Po/Dist- Angul, Odisha- 752001
Email- dm-angul@nic.in
4. The Additional Chief Secretary Steel & Mines Department,
Government of Odisha,
Steel and Mines Department, Loka Seva Bhawan,
Bhubaneswar, Khordha, Odisha- 751001
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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, Government of Odisha,
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9. Tahsildar, Tahsil Office,
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Email- taha.bana-od@nic.in
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Bhubaneswar, Odisha- 751022
Email- cgmland@idco.in

**Re: Before the National Green Tribunal,
Eastern Zone Bench, Kolkata
I.A. No. 7 of 2026
O.A. No. 83 of 2025**

In the matter of:
Satam Patnaik ...Applicant
versus
State of Odisha and Ors. ...Respondents

Our Client: Jindal Steel Ltd. (Respondent No. 2)

Sir,

Please find attached the scanned copy of the Counter Affidavit to IA No. 7 of 2026 to be filed by us on behalf of the Respondent No. 2 for your kind perusal and reference.

Please note that this shall be treated as an effective mode of service upon you.

Kindly acknowledge receipt of the same.

Thanking you

Yours sincerely
For SANDIP AGARWAL & Co.
Shivam Bhimsaria
Advocate

--
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Reply by R2 to I.A. No. 7 of 2026.pdf
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...Respondents



**REPLY ON BEHALF OF JINDAL STEEL
LIMITED, RESPONDENT NO. 2 TO
THE APPLICATION FILED BY THE
APPLICANT**

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