

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

**IA NO. 7 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: 19.03.2026

Email: sjmathews@gmail.com

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL EASTERN
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**SHORT SUBMISSION REGARDING RTI INFORMATION RECEIVED BY
THE APPLICANT FROM DDM, TALCHER CIRCLE**

MOST RESPECTFULLY SHOWETH:

1. It is respectfully submitted that subsequent to the filing of the present IA 7/2026 in OA 83/2025, the Applicant has received information under the Right to Information Act from the office of the Deputy Director of Mines, Talcher Circle, which materially strengthens the case for grant of interim relief. Copy of RTI Response vide Letter No. 501, dated 27.02.2026 is marked and annexed herewith as **Annexure A3**
2. The said RTI response clearly discloses that a show cause notice has already been issued to the Respondent No. 2 for undertaking activities without prior permission and in violation of applicable mining and regulatory norms.

3. The RTI record further confirms, on the basis of official inspection reports, that excavation and construction-related activities were in fact carried out in the Jamunda Jungle area without obtaining requisite approvals from the competent authority and were only halted temporarily on the intervention of the Sarpanch.
4. That the inspection findings, as reflected in the communication dated 26.02.2026, specifically record that minor minerals such as soil and sand were utilized for construction purposes without prior permission, in violation of the OMMC (Amendment) Rules, 2025
5. That this official confirmation assumes critical significance, as it removes any element of dispute regarding the illegality of the activities complained of and independently corroborates the Applicant's case that unauthorized excavation has been undertaken during the pendency of the proceedings. It is submitted that the continuation of such activities, despite regulatory intervention and issuance of a show cause notice, demonstrates a clear disregard for law and the authority of this Hon'ble Tribunal.
6. That, this further demolishes the claims made by Respondent No. 2 in the reply to this Interlocutory Application where they have evasively denied the allegations of the Applicant without an iota of documentary evidence. This

also highlights the attempt to mislead the Hon'ble Tribunal by stating that no activities were carried by them on the Subject land, when the documentary evidence produced by the Applicant in the IA as well as this subsequent RTI information clearly establishes the contrary.

7. In these circumstances, the necessity of immediate interim protection becomes even more compelling. The RTI information establishes not only a prima facie case but also ongoing illegality, and unless restrained, such activities are likely to continue, resulting in irreversible environmental degradation and rendering the proceedings infructuous. The balance of convenience, therefore, overwhelmingly lies in favour of maintaining status quo, and any delay in granting a stay would defeat the very purpose of the present proceedings.

THROUGH



SUNIL J. MATHEWS/ JYOTI CHIB/ ASHTAMI KHATRI

PLACE: BHUBANESWAR
DATE: 19.03.2026

Shanti Kunj, Link Road
Cuttack- 753001
(M) 9311567212
Email: sjmathews@gmail.com

Affidavit No. 4551 / 20 26
 Dated 19th March / 20 26

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

(Under Section 18(1) read with Section 14(1) and 15 of the National Green
 Tribunal Act 2010)

ORIGINAL APPLICATION NO. _____ / 2026

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VERSUS

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...RESPONDENTS

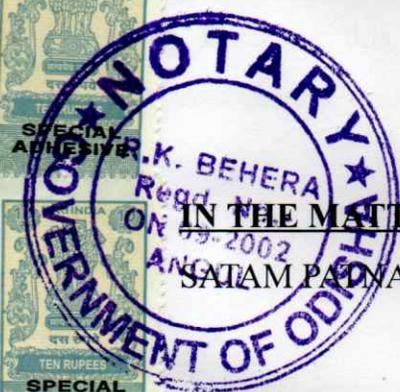
I Satam Patnaik , S/o Purusottam Patnaik, aged about 45 years, r/o 6th Lane,
 Amalapada, Near Gramya Bank, At/PO, Angul PS – Angul Odisha. PIN- 759122

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.

Satam Patnaik

DEPONENT



**NOTARY
 ANGUL**



VERIFICATION

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

Sabin Patra

DEPONENT

IDENTIFIED BY

[Signature]

27.3.26
**NOTARY
ANGUL**

Affidavit No. 4551 / 2026
 dated this 19th day of March 2026
 The above named deponent having been
 identified by Sri. A. Das
 Advocate, Angul
 solemnly affirmed before me this
 the 19th day of March
2026 at A.M./P.M. in
 the court premises that the contents
 of this affidavit true to the best of
 his/her knowledge.

27.3.26
**ROHITA KUMAR BEHERA
NOTARY
ANGUL, ODISHA
Regd. No-ON 09-2002
Cell-9439737146**



By: E-mail

**OFFICE OF THE DEPUTY DIRECTOR MINES, TALCHER CIRCLE, TALCHER.
DIST: ANGUL.**

Letter No- 501 / Mines, Dated, 27/02/2026

To

Sri Satam Patnalk
AT 6th Lane, Amalapada,
PO: Angul, Dist: Angul.
Email: - satam.patnaik@gmail.com

Sub:

Submission of information on RTI application dt.06.01.2026.

Sir,

With reference to the subject cited above, I am to enclose herewith the required information as sought for in RTI application dtd.06.01.2026 for favour of your information and necessary action.

Encl: As above.

Yours faithfully,

Public Information Officer-cum-
Mining Officer, Talcher.



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OFFICE OF THE DEPUTY DIRECTOR MINES, TALCHER CIRCLE, TALCHER
ANGUL DISTRICT
E-mail: mo.angul@od.gov.in

Letter No-382/MM

Date-27-02-2026

From,

Mining officer-cum-Competent Authority,
Minor Mineral, Angul District.

To,

Public Information Officer,
O/o Deputy Director Mines, Talcher.

Sub: Submission of report regarding R.T.I. application of Sri Satam Patnaik on dated 06-01-2026 under RTI Act 2005.

Ref: This office letter No. 104/Mines on dated 13-01-2026

Sir,

With reference to the subject cited above, I am herewith submitting the answer regarding R.T.I. application of Sri Satam Patnaik vide this office letter No. 104/Mines on dated 13-01-2026 under RTI Act 2005 with necessary enclosures attached with this letter.

1. *Show cause vide letter no-483/Mines, dated-26.02.2026 (Copy enclosed)*
2. *Inspection reports of Junior Mining Officers is enclosed here with for your information.*

Yours faithfully

Mining officer-cum-Competent Authority,
Minor Mineral, Angul District.

Encl: As above.

Mining Officer
Angul District
O/o Dy. Director Mines, Talcher



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By e-mail

OFFICE OF THE DEPUTY DIRECTOR MINES, TALCHER CIRCLE TALCHER.
DIST: ANGUL.

Letter No. 483 /Mines, Dated, 26/02/2026

To

The Vice President-cum- Advisor of
Jindal Steel & Power Limited/
Jindal Steel Odisha Limited.
AT- Chhendipada, Nisha, Dist: Angul.

Sub: Regarding forceful work in Jamunda Jangal Mines area of JSPL-Angul.

Ref: Representation dtd.24.12.2025 of Satam Patnaik.

Sir,

On receiving of representation dtd.24.12.2025 of Satam Patnaik regarding forceful work in Jamunda Jangal, the mining squad of this office have visited at the alleged area within acquired land of M/s JSPL, Angul and findings are as follows:-

- Without prior permission the construction work nearby Jamunda Jangal carried out by your personnel.
- The progress of widening and excavation work nearby Jamunda Jangal area has been carried out & stopped on intervention of the Sarpanch and villagers of Jamunda Jangal.

It is observed that, you have used minor minerals i.e. sand/soil for construction work nearby Jamunda Jangal without prior permission from Competent Authority, Minor Minerals, Angul which violated the OMMC (amendment) Rules, 2025.

Therefore you are hereby show ~~caused~~ for such lapses and satisfied reply from your end should be reach to the undersigned within 7 (seven) days of issue of this letter, failing which action as deemed proper shall be initiated against you.

This may be treated as most urgent.

Yours faithfully,

Deputy Director Mines (I/c),
Talcher Circle, Talcher.

⊗

30/12/2025

To

The Deputy Director Mines
Talcher Circle, Talcher

Sub:- Inspection report on the widening work of the transportation road nearby Jamunda Jungle area within acquired land of M/s JSPL plant, Angul.

Sir,

Alkaly. P. Mishra 26/12/2025

With reference to the captioned subject and as per your instruction, we would like to inform you that the mining squad of this office visited the site of widening work of the transportation road nearby Jamunda Jungle area, within acquired land of M/s JSPL plant, Angul, on dated 26/12/2025 after receiving an allegation raised by Satam Patnaik.

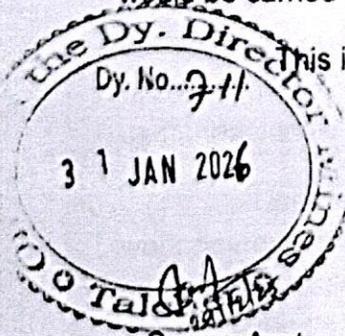
The alleged area nearby Jamunda Jungle was verified in the presence of Sri Soubhagya Biswal, AGM, (Land and PR Department) and Sri Susanta Mishra, DGM, (Plant site) both of M/s JSPL, Angul. During the discussion, they informed us that the said construction work has been entrusted to a third party.

It was observed that the widening work of the transportation road and excavation activities were being carried out with the help of a PC machine nearby Jamunda Jungle area (Photograph enclosed).

Upon enquiry regarding the progress of the widening and excavation work nearby Jamunda Jungle area, the above officials stated that all types of work had been stopped following the intervention of the Sarpanch and villagers of Jamunda Jungle.

Therefore, we strictly instructed them to stop any kind of construction activity nearby Jamunda Jungle area and further directed them not to undertake any construction work without obtaining prior permission from the Deputy Director Mines (DDM), Talcher Circle, Talcher. They assured us that, no construction work would be carried out without prior permission of the DDM, Talcher.

This is for favour of your kind information and necessary action.



Survey Asst.
O/o the DDM, Talcher

[Signature]
30/12/2025
JMO

O/o the DDM, Talcher

Yours Faithfully

[Signature]
JMO

O/o the DDM, Talcher



sunil mathews <sjmathews@gmail.com>

Advance Service of Short Submission in IA 7/2026 in OA 83/2025

1 message

Sunil J. Mathews <sjmathews@gmail.com>

19 March 2026 at 13:09

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, Varun Mishra <varun@vmchambers.com>

Dear all,

Please find attached a copy of the short submission in in **IA 7/2026 in OA 83/2025 - Satam Patnaik v. State of Odisha**

Next date of hearing is 20.03.2026

Regards

--

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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 **RTI Submission_Jamunda Mines.pdf**

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