

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

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

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FILED BY

Akansha Singhania
Advocate

X

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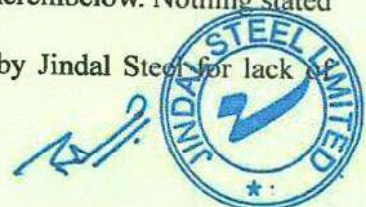
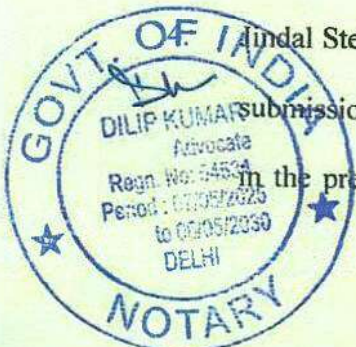
...Respondents

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

MOST RESPECTFULLY SHOWETH:

1. The present OA No. 83 of 2025 is filed by the Applicant alleging illegal and unauthorized mining activities carried out by Jindal Steel Limited ('Respondent No. 2/ Jindal Steel') in Jamunda Jungle Revenue Village, under Badakerjang Gram Panchayat, Banarpal Tehsil, Angul District, Odisha admeasuring 10.36 acres ('Subject Land').
2. It is submitted that Jindal Steel has already filed a detailed Counter Affidavit to the present OA and a reply to the IA No. 7 of 2026 for interim relief filed by the Applicant. The said Counter Affidavit and reply to the IA No. 7 of 2026 exhaustively answers each and every allegation raised by the Applicant in the OA, the application for stay, and the present short submission.
3. It is submitted that Jindal Steel reiterates and relies upon the said Counter Affidavit filed in the present OA and a reply to the IA No. 7 of 2026 along with all annexures thereto, which are 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.

Jindal Steel denies all the contentions, allegations and averments made in the present short submissions filed by the Applicant unless specifically admitted hereinbelow. Nothing stated in the present reply may be construed to have been admitted by Jindal Steel for lack of



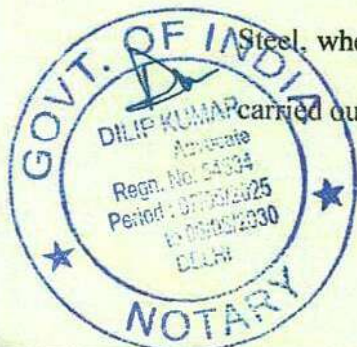
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Akansha Singhania
Advocate

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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 outset, the OA, the application for stay and the short submissions filed by the Applicant are wholly misconceived, baseless, devoid of merits and amounts to a clear abuse of the process of law. They neither disclose any fresh cause of action nor points to any supervening circumstance or environmental impact warranting interim intervention by this Hon'ble Tribunal.
6. Further, 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. Further, it may be noted that the possession of the land lies with IDCO till date.
7. It is respectfully submitted that the Applicant has erroneously relied upon the Inspection Report dated 30.12.2025 and the subsequent Show Cause Notice dated 26.02.2026 issued to Jindal Steel to allege that Jindal Steel has undertaken activities without prior permission and in violation of applicable mining and regulatory norms.
8. In this regard, and without prejudice, it is submitted that the Inspection Report pertains solely to the transportation road and ancillary activities, and bears no nexus whatsoever to the Subject Land, as incorrectly alleged by the Applicant.
9. It may be noted that a show cause notice cannot be treated as a proof of any alleged violation. Without prejudice it is submitted that the show cause notice relied upon by the Applicant pertains to limited activities relating to access road in areas adjoining the project and has no nexus whatsoever with the subject land forming the basis of the present IA.
10. It is further submitted that the said Show Cause Notice has been duly responded to by Jindal Steel, wherein it was, *inter alia*, clarified that no illegal, or unauthorized activity has been carried out. It was specifically stated therein that only limited work in the nature of levelling

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Advocate



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and minor straightening of an existing temporary (kachha) road was undertaken to facilitate smooth vehicular movement. Importantly, the said kachha road does not form part of the Subject Land.

11. The aforesaid reply further clarifies that Jindal Steel has merely undertaken site-level preparatory and safety-related measures, including removal of loose debris and maintenance of pre-existing access routes in areas adjoining the Subject Land, strictly in accordance with applicable law. It is reiterated that no mining, excavation, extraction of minor minerals, or any other alleged activity has been carried out by Jindal Steel on the Subject Land.
12. It is stated that Jindal Steel is not undertaking any industrial activities in the subject land as the land is currently in IDCO's possession. It is reiterated that no mining activity, excavation, transportation, or commercial use of minor minerals has been undertaken by Jindal Steel. The attempt to rely on an unadjudicated show cause notice to allege illegality is therefore misconceived and cannot form the basis of any adverse inference. This has been clearly mentioned in Jindal Steel's response to the show cause notice. Therefore, these allegations are unfounded and devoid of any merit. The attempt to rely on such unrelated proceedings to allege illegality in respect of the subject land is wholly misconceived and untenable.
13. Moreover, the Applicant has previously initiated multiple proceedings against Jindal Steel on similar grounds, all lacking merit and aimed at obstructing legitimate industrial operations rather than addressing genuine environmental concerns. The Applicant is a habitual litigant and has come with unclean hands. It is stated that the OA, Application for stay and the present short submissions are not a public interest litigation, but a private vendetta filed by a litigant repeatedly cautioned by other forums for *mala fide* conduct.
14. Therefore, it is clear that Jindal Steel has complied with all the legal formalities and procedures as prescribed under law, contrary to the erroneous allegations made by the Applicant.
15. 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 Application for stay would cause grave prejudice to Jindal Steel.

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Anurupa Singhania
Advocate



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16. 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.
17. In any event, the relief sought in the present Application is unreasonable and devoid of merit. The Applicant seeks a blanket restraint on all project-related activities in the Jamunda Jungle area which, if at all, are being undertaken in accordance with law.
18. 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.
19. 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.
20. The present application therefore ought to be dismissed *in limine*, with costs.

FILED BY
Akansha Singhania
Advocate



THROUGH

Akansha Singhania
Advocate



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I.A. No. 7 of 2026

IN

Original Application No. 83 of 2025

IN THE MATTER OF:

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...Applicant

Versus

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...Respondents

AFFIDAVIT

I, Rajan Anand, s/o B. K. Anand aged about 54 years, am the Authorized Signatory of Jindal Steel Limited, having its office at Jindal Centre, 12 Bhikaji Cama Place, New Delhi - 110066, presently at New Delhi do hereby solemnly affirm and declare as under:

1. I am the Authorised Representative of Jindal Steel Limited, and being fully conversant with the facts and circumstances of the present case, I am competent to depose this affidavit on behalf of Respondent No. 2.
2. That the contents of the present Reply to Short Submissions 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 to Short Submissions are true statement of facts to the best of my knowledge.
3. That no part of this affidavit is false and no material facts have been concealed therefrom.



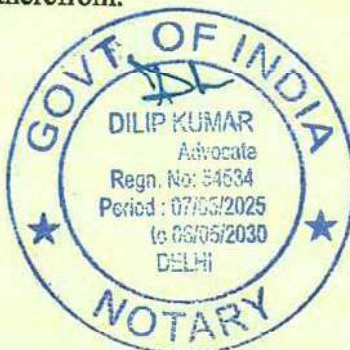
DEPONENT

VERIFICATION

Verified at Delhi on this 24 APR 2026 day of 2026 that the contents of para numbers 1 to 3 of this affidavit are true and correct to the best of my knowledge and belief. No part of it is false and nothing material has been concealed therefrom.

ATTESTED
[Signature]
DILIP KUMAR
NOTARY PUBLIC
Reg. No. 54534

24 APR 2026



DEPONENT

Re: O.A. No. 83 of 2025 || Service of Reply to Short Submissions to IA No. 7 of 2026

1 message

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

Fri, Apr 24, 2026 at 7:21 PM

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,

1. Satam Patnaik,
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Email- satam.patnaik@gmail.com
2. State of Odisha, through Chief Secretary of Odisha,
LokaSeva Bhavan, Bhubaneshwar – 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
Email- dsmsec.or@nic.in
5. Office of the Sarpanch,
Badakerjang Gram Panchayat,
P.O. Badakerjang, Dist- Angul,
Odisha- 759143
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, Government of Odisha,
Email- dirmms-rev@gov.in
8. Divisional Forest Officer, Angul
At/Po/Ps- Angul
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

**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 Reply to Short Submissions 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.**

Advocate

--

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 **Reply to Short Submissions on behalf of R2- IA No. 7 of 2026.pdf**
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TRIBUNAL

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



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