

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. 83 Of 2025

Satam Patnaik

...Applicant

Versus

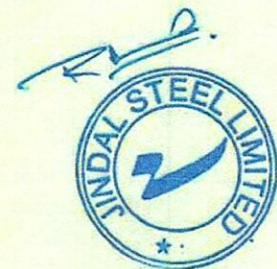
State of Odisha & Ors.

...Respondents

**COUNTER AFFIDAVIT ON BEHALF OF JINDAL STEEL/ RESPONDENT
NO. 2 TO THE ORIGINAL APPLICATION FILED BY THE APPLICANT**

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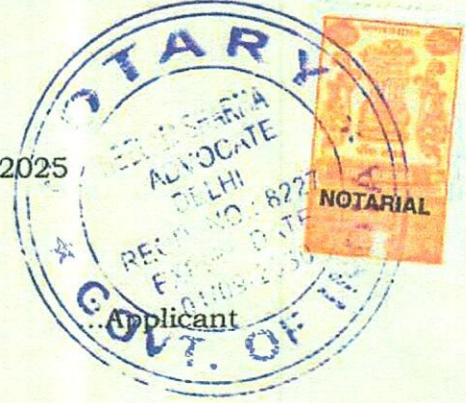
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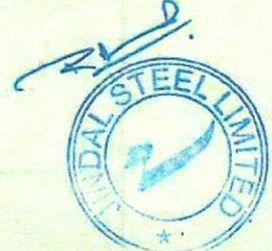
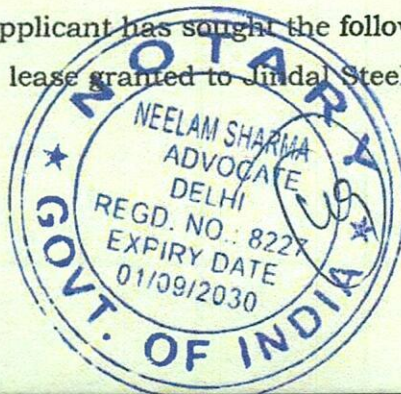
...Respondents



**COUNTER AFFIDAVIT ON BEHALF OF JINDAL STEEL/ RESPONDENT
NO. 2 TO THE ORIGINAL APPLICATION FILED BY THE APPLICANT**

I, Ranjan Anand, son of B.K. Anand, aged about 54 years, presently employed as Assistant Vice President at Jindal Steel & Power Limited, having its office at Jindal Centre, 12, Bhikaji Cama Place, New Delhi-110066, do hereby solemnly affirm and declare the following:

1. That I, the above-named Deponent, am authorized and well conversant with the facts and circumstances of the present case and thus competent to swear the present Affidavit.
2. That I have read and understood the contents of the present Affidavit. The contents thereof are true and no part of it is false, and no material has been concealed therefrom.
3. The present counter affidavit is being filed by Jindal Steel Limited ("Jindal Steel/ Respondent No. 2") formerly known as Jindal Steel & Power Limited ("JSP") to the Original Application ("OA") filed by the Applicant under Section 18 of the National Green Tribunal Act, 2010 ("NGT Act, 2010").
4. The Applicant has sought the following directions viz. (i) cancellation of the lease granted to Jindal Steel with respect to Khata No. 1, Plot

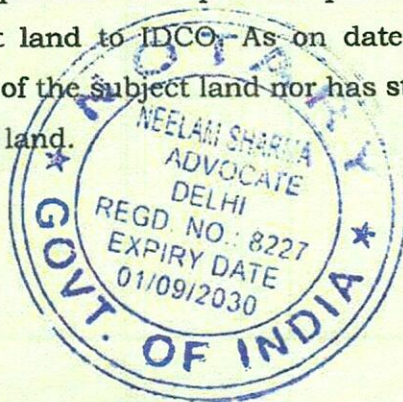


No. 763 admeasuring an area of 10.36 acres in Jamunda Jungle Revenue Village, Banarpal Tehsil, Angul ("subject land"), (ii) initiate legal and disciplinary action against the officials responsible for the fraudulent assessment and unauthorized mining activities, and (iii) restore the affected hill area and imposition of environmental compensation for the damage caused.

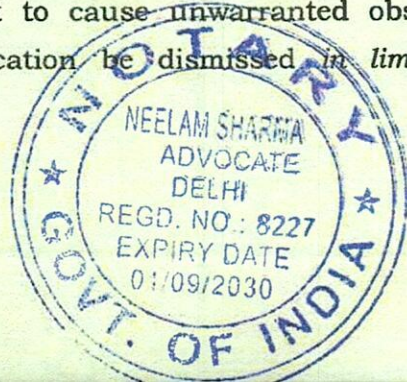
5. Jindal Steel denies all contentions, allegations and averments made by the Applicant in the present OA unless specifically admitted hereinbelow. Nothing stated in the OA may be construed to have been admitted by Jindal Steel for lack of specific denial. Jindal Steel is filing the limited counter-affidavit without para-wise reply and reserves its right to file a further counter affidavit in case required at a later stage.
6. That without prejudice to the above and as an alternative submission, the deponent craves liberty to raise further required contentions during the course of the proceedings if sought by this Hon'ble Tribunal.

PRELIMINARY OBJECTIONS

7. At the outset, it is submitted that the present Application is misconceived, motivated, and an abuse of the process of this Hon'ble Tribunal.
8. The OA is hopelessly barred by limitation under section 14(3) of the NGT Act and this is clear from the Applicant's own pleadings. The Applicant has specifically admitted that the alleged cause of action first arose on 10.04.2024 when the villagers purportedly became aware of the alleged lease in favor of Jindal Steel. In terms of 14(3) of NGT Act, 2010, the limitation period of six months expired in the first week of October 2024. The OA was filed in April 2025, and thus, is beyond the statutory period of limitation.
9. There is no grant of mining lease in favour of Jindal Steel as alleged by the Applicant. The present process is only for transfer of government land to IDCO. As on date, Jindal Steel is neither in possession of the subject land nor has started any industrial activity on the said land.



10. The grievance raised by the Applicant pertains essentially to government land. The Applicant's allegations revolve around the process of allotment and as such does not constitute a substantial question relating to environment within the meaning of section 14(1) of the NGT Act. The Applicant's attempt to project a concluded lawful government land allotment as an environmental grievance is misconceived, jurisdictionally unattainable and an abuse of the process of law. Also, the OA proceeds on a wholly false assumption that a mining lease exist in favor of Jindal Steel.
11. 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 is not a public interest litigation but a private vendetta filed by a litigant repeatedly cautioned by other forums for *mala fide* conduct.
12. Records, including proceedings before the Odisha Human Rights Commission in Case No. 1639 of 2025, show that the Applicant has been involved in repeated disputes and disruptions, often acting in concert with local groups to oppose Jindal Steel's operations without substantiated cause.
13. In a Civil Suit No. 60 of 2022, the Learned Civil Judge, Angul, was pleased to grant a permanent injunction restraining the Applicant from interfering with the lawful activities of Jindal Steel. Despite such orders, similar actions have continued, including through third parties and repeated complaints on the same issues.
14. Local police have also registered FIR Nos. 0111/2024 and 0370/2024 against the Applicant in connection with incidents affecting law and order near the project site of Jindal Steel in the state, further evidencing the disruptive impact of the Applicant's activities.
15. It is therefore submitted that the present Application is devoid of bona fide environmental issues and has been filed with the sole intent to cause unwarranted obstruction. It is prayed that the Application be dismissed *in limine* with appropriate costs, to



discourage repetitive and unsubstantiated litigation. The present counter-affidavit is filed without prejudice to all other rights and contentions of Jindal Steel.

16. In view of the above, it is evident that the present application is not driven by genuine environmental concerns but is a continuation of the Applicant's pattern of disruptive and unsubstantiated actions against Jindal Steel. The proceedings are devoid of any merit and serve only to burden this Hon'ble Tribunal and obstruct lawful operations of Jindal Steel.
17. Jindal Steel has at all times operated in accordance with law. It is submitted that the allegations raised in the present application are factually incorrect, legally unsustainable and stand contradicted for the reasons as mentioned in the present Reply.

FACUTAL BACKGROUND

18. On 03.11.2005, a Memorandum of Understanding ("MoU") was signed between Jindal Steel and Respondent No. 1 for establishment of 600 MTPA Steel Plant and 900 MW Captive Power Plant in the State of Odisha.
19. Pursuant to signing of the MoU, the State Government initiated the process for leasing the required land for the project. Since the subject land was a government land, no land acquisition proceedings were required, and the lease process was initiated by IDCO along with the other government lands around the subject land during the year 2006.
20. Thereafter, IDCO identified a patch of Government land measuring an area of 56.86 acres in village Jamunda Jungle under Angul Tahasil (including the subject land), which was found suitable for establishment of industries. Therefore, IDCO requested Respondent No. 9 to process the proposal for sanction of lease in favour of IDCO. The subject land consisted of a stone quarry, which required assessment of quantum and value of minor minerals by Respondent No. 6 and 9 respectively.
21. On 30.03.2012, the Revenue & Disaster Management Department accepted the recommendation for extinction of Sairat source of the



subject land subject to payment of Rs. 90,80,000 as assessed towards the value of the minor minerals available in the subject land by Respondent No. 10 / IDCO. Only upon extinction could the land be leased in favour of IDCO under the provision of OGLS Act/Rules.

A copy of the letter dated 30.03.2012 issued by Revenue & Disaster Management Department to Revenue Divisional Commissioner is annexed herewith and marked as **Annexure-"A"**.

22. Subsequently, on 28.09.2020 Respondent No. 9 raised a revised demand of Rs.1,91,71,316 to IDCO, towards payment of royalty and other statutory dues over the minor minerals (Page 76 of the present OA). Pursuant thereto, Jindal deposited a sum of Rs. 2,14,33,532, which includes the revised demand as stated above and IDCO charges of Rs. 19,17,132/-, thereby discharging the assessed obligations.

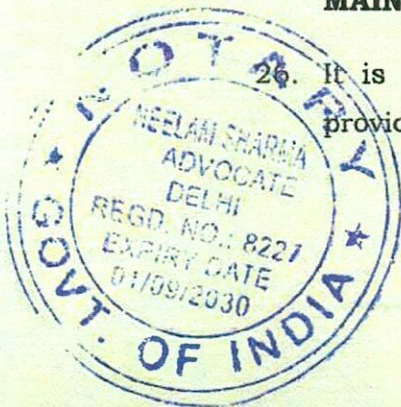
A copy of the letters dated 25.02.2021, 01.03.2021 and 23.03.2021 issued by IDCO to Jindal Steel is annexed herewith and collectively marked as **Annexure-"B"**.

23. The Sub-Collector, Angul in its order dated 23.06.2021 recorded such compliance by IDCO and recommended cancellation of quarry lease proposal [Page 57 of the present OA] which was duly approved by Respondent No. 3 on 10.07.2021 (Pg. 58 of the present OA).
24. Thereafter, following the public notice dated 11.07.2021, Respondent No. 3 sanctioned the subject land in favour of IDCO on 06.03.2023 and a lease deed was executed between Respondent No. 3 and IDCO on 04.09.2023. It is submitted that no lease has ever been granted to Jindal Steel and as on date, Jindal Steel neither has possession of subject land nor any mining rights therein.
25. The submissions on behalf of Jindal Steel are as follows:

SUBMISSIONS

I. THE PRESENT OA IS BARRED BY LIMITATION AND IS NOT MAINTAINABLE

26. It is submitted that the present OA is barred by limitation, as provided under Section 14(3) of the NGT Act, 2010 and hence,



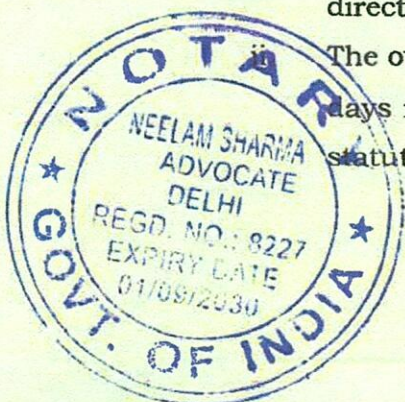
should be dismissed on this ground alone. The NGT Act mandates that any application raising a substantial question relating to environment as contemplated under Section 14(1) must be instituted before this Hon'ble Tribunal within a period of six months from the date on which the cause of action for such dispute first arose. The relevant provision is extracted below for ease of reference:

"Section 14(3): An application for adjudication of dispute under this section may be made to the Tribunal within a period of six months from the date on which the cause of action for such dispute first arose:

Provided that the Tribunal may, if it is satisfied that the applicant was prevented by sufficient cause from filing the application within the said period of six months, allow it to be filed within a further period not exceeding sixty days."

27. In view thereof, it is clear that this Hon'ble Tribunal can adjudicate the disputes arisen only if it is made within a period of six months from the date on which the cause of action in such dispute first arose and the Tribunal for sufficient cause can condone the delay for a period not exceeding 60 days in making the application.
28. In the present case, it is the Applicant's own case and an admitted position that the alleged cause of action first arose on 10.04.2024, when the villagers, including the Applicant, became aware of the alleged grant of mining lease in favour of Jindal Steel.
29. Therefore, in accordance with Section 14(3) of the NGT Act, the period of six months for instituting proceedings would expire in the first week of October 2024. Even if the Applicant were to seek condonation of delay (which the Applicant has not sought for in the present OA), the absolute outer limit to institute the OA would be the first week of December 2024. There is no provision under the NGT Act for condoning delay beyond this statutory ceiling.
30. Further, it is well settled principle of law that:
 - i. The limitation period under Section 14(3) is mandatory and not directory.

The outer limit of six months, extendable by no more than sixty days is very strict and any further enlargement of limitation is statutorily prohibited.



- iii. The Limitation Act, 1963 is inapplicable to extend limitation under the NGT Act, owing to the express special period prescribed by the statute.

31. It is submitted that the Applicant under the header "Limitation" has stated as follows:

That there exists a subsisting cause of action in the present matter, as no action has been initiated against Respondent No.2 till date. Furthermore, the illegal and unauthorized mining activities are still being carried out by Respondent No. 2 in the Jamunda Jungle Mines. The present Application has been filed within the period of limitation from the date on which the cause of action initially arose, i.e., 10/04/2024, and since the said cause of action is continuous in nature, the Application is not barred by limitation.

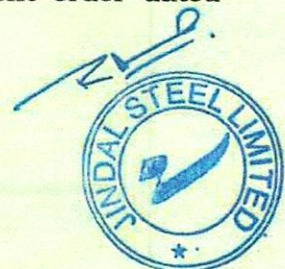
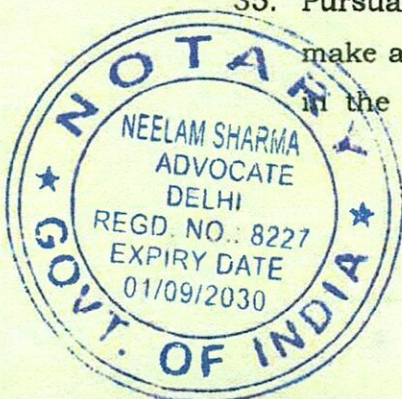
32. In this regard, it is submitted that the concept of continuous cause of action is alien to this Hon'ble Tribunal. A perusal of Section 14 indicates that the concept of continuous cause of action cannot apply to the proceedings filed before the NGT because had it been so, the legislature would not have stated that the limitation would be six months from the date on which the cause of action for such dispute first arose. Where the legislature specifically requires the action to be brought within the prescribed period of limitation computed from the date when the cause of action 'first arose', it would by necessary implication exclude the extension of limitation or fresh limitation being counted from every continuing wrong.

33. Therefore, it is clear that the OA filed by the Applicant is not maintainable being barred by limitations and hence liable to be dismissed on this ground alone.

II. NO MINING LEASE OR POSSESSION WITH JINDAL STEEL

34. It is an admitted position on record that no mining lease has ever been granted in favour of Jindal Steel. The entire process originated from MoU dated 03.11.2005 between Jindal Steel and Respondent No. 1 for setting up a steel plant and a captive power plant.

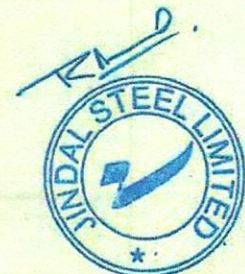
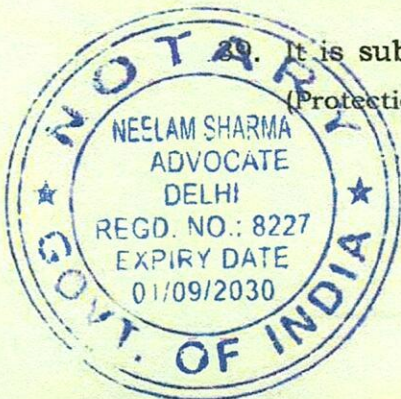
35. Pursuant thereto, the government through IDCO undertook steps to make available government land for industrial use. This culminated in the Revenue & Disaster Management Department order dated



30.03.2012 approving extinction of Sairat source subject to payment of assessed value of minor minerals.

36. All statutory dues were thereafter fully paid by Jindal Steel through IDCO on 23.03.2021, following which the Sub-Collector, Angul by an order dated 23.06.2021 formally recorded compliance and cancellation of the quarry lease proposal. Respondent No. 3 approved such cancellation on 10.07.2021. The subject land was subsequently sanctioned only in favour of IDCO under order dated 06.03.2023 and a lease deed was executed between Respondent No. 3 and IDCO on 04.09.2023.
37. Therefore, as on date the land vests with IDCO, a state owned entity and Jindal Steel neither has possession nor has started any industrial activity on the said land. The Applicant's allegation of fraudulent assessment and unauthorised mining or illegal lease in favour of Jindal Steel are factually baseless, legally unsustainable, and contrary to the documentary record. The OA is therefore premised on a false foundation and misconceived in law and deserves dismissal in *limine*.
38. The present objection is speculative and jurisdictionally untenable as they pre-suppose a mining lease. Further, the allegation of fabrication of Field Inspection Report dated 05.02.2015 is baseless, misleading, and unsustainable. The Applicant seeks to rely on a subsequent report dated 31.07.2024 to discredit earlier report dated 05.02.2015. However, the two reports are separated by nearly a decade and reflect the prevailing circumstances at their respective times. The 2015 report correctly recorded the factual position as it stood then, whereas the 2024 report merely supplements the record in light of subsequent developments. A later inspection cannot retrospectively invalidate or render an earlier contemporaneous report as fabricated. The sweeping allegation of fabrication is unsupported by any material and is nothing but an attempt to advance a false narrative. At best, the later report supplements the record and the allegation of fabrication is reckless and *malafide*.

It is submitted that there can be no violation of the Environment (Protection) Act, 1986 and the Forest Conservation Act, 1980, as the



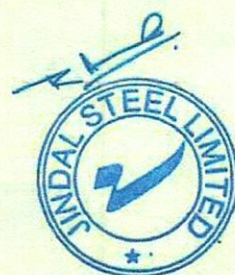
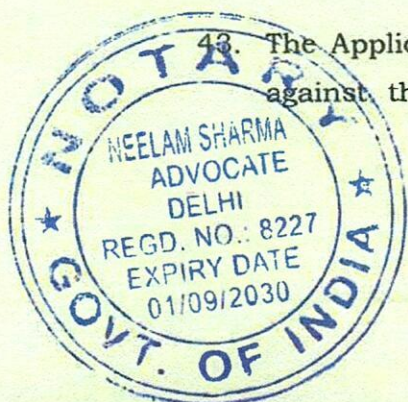
subject land was never allotted for mining purpose but only for establishment of the Industry under Orissa Government Land Settlement Act, 1982 and Rules framed thereunder. No environment clearance, forest clearance, or approved mining plan was ever required because there was no mining lease in existence. The process culminating in the lease deed dated 04.09.2023 was lawful transfer of government land to IDCO for industrial development. Therefore, the allegation of breach of EC, FC are factually baseless and legally misconceived.

40. Further, the Applicants reliance on Orissa Land Reforms Act, 1960 is legally misconceived. The said Act is aimed at agrarian reforms, protecting the rights of tenants and cultivators (raiyaats), establishing land ceilings, and regulating the transfer of land, particularly concerning Scheduled Castes and Tribes. It has no application whatsoever to the grant of government land for industrial purposes under Orissa Land Reforms Act, 1960. Even otherwise, the said Act contains no prohibition for grant of a lease for industrial or alleged mining purposes on the grounds that there is an existing habitat, public road, temple, or grown-up tree on the land. Therefore, this allegation is wholly irrelevant and legally untenable.

III. THE APPLICANT HAS APPROACHED THIS HON'BLE TRIBUNAL WITH UNCLEAN HANDS

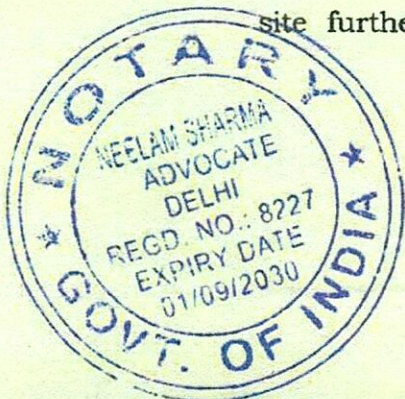
41. The allegations of the Applicants are premised on the assertion that the present matter pertains to the grant of mining lease is wholly misplaced and is nothing but an attempt to mislead this Hon'ble Tribunal. It is submitted that it is not a case of grant of mining lease but a case of sanctioning of a lease for government land for the purpose of setting up an industry.
42. It is 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.

43. The Applicants has a history of filing multiple frivolous litigations against the Opposite Party No. 3 in multiple forums including



coercive tactics before Orissa Human Rights Commission where the Commission itself cautioned the Applicants against blackmailing practices. Below are the details of some of the proceedings initiated by the Applicants against Jindal Steel wherein the Applicants has used coercive methods before the Courts/Commission.

- i. In Case No. 1639 of 2025 , pending before Odisha Human Rights Commission the order dated 17.05.2025 records that *"Commission cautions the complainants to refrain from adopting the blackmailing tactics before the Commission by threat of self-immolation to obtain a favourable order or to take up the matter urgently or on out of turn basis which seems to be handiwork of some persons and also not seek any command order by making some baseless allegations, otherwise the Commission shall take adverse view against them in the matter."*
 - ii. The Ld. Civil Judge, Angul by its order dated 04.04.2025 in Civil Suit No. 60 of 2022 granted permanent injunction restraining the Applicants from interfering with the lawful activities of Jindal Steel. The Ld. Civil Judge, Angul also permanently restrained the Defendants (Applicants in the present case) from obstructing the service road and from generating any nuisance upon the properties in relation to abovementioned suit.
44. It is further submitted that the Respondent No. 3 has on multiple occasions made detailed representations before the concerned authorities regarding the obstruction and unlawful interference by the Applicants and his accomplices highlighting their continuous attempts to disrupt legitimate activities of Respondent No. 3. These representations clearly demonstrate that the present OA is not an isolated instance but part of a sustained pattern of harassment of Opposite Party No. 3 and abuse of process of law.
45. Further, the local police have also registered multiple FIRs against the Applicants in connection with incidents affecting law and order, such as inciting riots, collusion, conspiracy etc., near the project site further evidencing the disruptive impact of the Applicant's



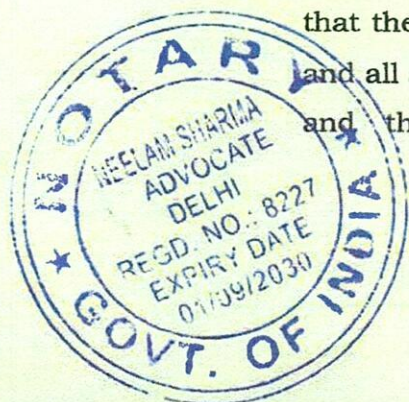
activities. The details of the FIRs are produced below for ready reference:

S. No.	FIR No.	Reasons for Complaint
1.	0719/2024	For criminal intimidation, criminal conspiracy
2.	0111/2024	For Obscenity, criminal intimidation
3.	0370/2024	Illegal trespass and blockade of Jindal Steel transportation road developed on their acquired land near Banaradiha Sahi leading to the plant.
4.	0190/2025	Attempt to murder, criminal trespass, hurt, arson, wrongful restraint, criminal restraint, criminal intimidation, organized crime, abetment, criminal conspiracy, at the Construction site of Jindal Steel at Badakerjang.

46. It is clear from the above that the Applicants is not a bona fide litigant and has approached this Hon'ble Tribunal with oblique motives, solely with the intent to unjustly enrich himself and to secure monetary advantage rather than to assert any genuine and enforceable legal right. The present OA, being motivated by mala fide considerations and devoid of bona fide cause, is liable to be dismissed at the threshold.

47. The Applicant has approached this Hon'ble Tribunal with unclean hands and have suppressed material facts and documents which are relevant for proper adjudication of the present issue. It is a settled principle of law that any person seeking equitable relief from the Hon'ble Court must come with clean hands. However, in the present case, the Applicant has deliberately concealed certain facts which, if disclosed, would have materially altered the case before this Hon'ble Tribunal. Therefore, it is clear that that the present OA is nothing but an abuse of process of this Hon'ble Tribunal and the present OA ought to be dismissed at the threshold.

48. In view of the foregoing, it is respectfully submitted that the OA is ex-facie barred by Section 14 of NGT Act, 2010 and is premised on a wholly false assumption that a mining lease exists in favour of Jindal Steel. The undisputed statutory records clearly demonstrate that the Sairat source was extinguished by order dated 30.03.2012 and all assessed statutory dues were fully discharged on 23.03.2021 and the quarry lease proposal was expressly cancelled on



10.07.2021. Further, the Applicant is a habitual litigant and has approached this Hon'ble Tribunal with a mala fide intent and suppression of material facts with a continuing pattern of vexatious proceedings, and therefore, the present OA ought to be dismissed.

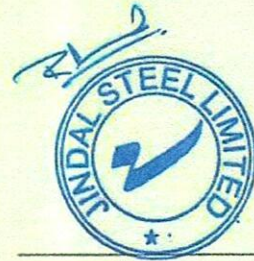
49. That the statements made in paragraphs 1 to 6, 11 to 14, 18 to 24, 43 and 45 of the foregoing affidavit are true to my knowledge and those contained in the remaining paragraphs are my humble submissions before this Hon'ble Tribunal.

Prepared in my office

Anirudh
Advocate

[Signature]

I identified the deponent who has signed in my presence



Deponent

Identified by me

Anirudh
Advocate

ATTESTED

[Signature]
NOTARY (Govt. of India)
Neelam Sharma, Advocate
Enrol. No.-D1281/2001
Ch. No. 165A, Gate No. 11
Patiala House Courts,
New Delhi-110001
(M): 9899408301

11 SEP 2025

ANNEXURE - "A"

Annexure R/T

By Request

GOVERNMENT OF ODISHA
REVENUE & DISASTER MANAGEMENT DEPARTMENT

No. ST-02/2012-1424 /R&D.M. dtd. 30.12.12

From Sri P.K. Behera,
Deputy Secretary to Government

To The Revenue Divisional Commissioner,
(Northern Division), Sambalpur.

*Accy/Co
A
1/1/12*

Sub : Extinction of sairat source in village-Jamunda Jungle under Banarpal Tahasil of Angul district for eventual leasing out the land in favour of IDCO for industrial purpose.

Ref: Your office letter No. 542 dated 28.12.2011.

Sir,

*Govt
Tahasil, Banarpal*

With reference to the subject noted above, I am directed to say that Government, after careful consideration, have been pleased to accept your recommendation contained in the aforesaid letter and allow extinction of the sairat source in village Jamunda Jungle under Banarpal Tahasil as per the land schedule given below for eventual leasing out of the land in favour of IDCO for industrial purpose subject to the following conditions:-

*Rev A
1/1/12*

- (i) IDCO shall pay Rs.90,80,000/- as assessed by D.D. Mines, Talcher in his letter No. 10576 dated 7.7.2011 (copy enclosed) towards the value of the minor mineral available in the source before the sairat source is declared extinct.
- (ii) After extinction of the source, the lease of the land shall be considered in favour of IDCO under the provisions of OGLS Act/ Rules on payment of premium, annual ground rent and cess as assessed by the competent revenue authority.

- 2. Appropriate steps may be taken accordingly under intimation to this Department.
- 3. The case record bearing No. 251/2009-10 of Banarpal Tahasil is returned herewith the receipt of which may be acknowledged.

Yours faithfully,

[Signature]
30/12/12

Deputy Secretary to Government

*Govt RA - Rev. (B)
1/1/12*

Memo No. 14425 /R&D.M. Dated 30.3.12
Copy forwarded to Managing Director, IDCO, Bhubaneswar for information and necessary action.

[Handwritten Signature]
30/3/12

Deputy Secretary to Government

Memo No. 14426 /R&D.M. Dated 30.3.12
Copy forwarded to the Collector, Angul/ Sub-Collector, Angul/ Tahasildar, Banarpal for information and necessary action.

[Handwritten Signature]
30/3/12

Deputy Secretary to Government

Memo No. 14427 /R&D.M. Dated 30.3.12
5 copies to Guard file.

[Handwritten Signature]
30/3/12

Deputy Secretary to Government

[Handwritten Signature]

ANNEXURE - "B"

16

Sumitra Kumari Pattnaik, OAS-(S)
Land Officer



No.HO/P&A-LA-E- 4068/19/VOL-VI/ - 3664

Dated 25 February, 2021

To
M/s.Jindal Steel & Power Ltd.,
Plot No.3, Forest Park,
Bhubaneswar-751009.

Sub:- Deposit of Royalty against acquiring the Jamunda
Jungle Stone Quarry No.1.

Ref.:- Demand letter No.7241 Dtd.28.09.2020 of Tahasildar,
Banarpal.
This Office letter No.13021 Dtd.12.07.2012

Sir,

With reference to the above cited letters on the captioned subject, I am to state that Government in R&DM Department vide its letter No.14424/R&DM Dt.30.3.2012 had been pleased to approve the recommendation of the Tahasildar for extinction of sairat source in respect of village Jamunda Jungle pertaining to Plot No.763 classified as "Paibata" under Khata No.1 with the condition that IDCO shall pay Rs.90,80,000/- as assessed by Deputy Director, Mines, Talcher towards the value of the minor minerals available in the source before the sairat source is declared extinct. After extinction of the source, the lease of the land shall be considered in favour of IDCO under the provisions of OGLS Act/Rules on payment of premium, annual ground rent and cess as assessed by the competent revenue authority.

Accordingly, as per the letter No.3302 Dt.6.7.12 of Tahasildar, Banarpal, IDCO vide its letter No.13021 Dtd.12.7.12 had requested JSPL to deposit a sum of Rs.90,80,000/- towards the value of minor minerals available in the source for sanction of lease proposal in respect of Ac.10.36 land. But JSPL did not turn up to deposit the requisite amount with IDCO for eventual payment to the Tahasildar, Banarpal for the aforesaid extinction.

In the meantime, Tahasildar, Banarpal vide his letter No.7241 Dtd.28.09.2020 has intimated that the rate of royalty and other dues has been revised as per OMMC (Amendment Rules 2016) and requested IDCO to deposit a sum of Rs.1,91,71,316/- with the following break up for taking further action on the matter. Copy of letter Dtd.28.09.2020 is enclosed herewith for ready reference.

Royalty: 128000 Cum. @ Rs.130/- per Cum.	...	16640000
Dead Rent	...	35316
DMF (10%)	...	1664000
EMF(5%)	...	832000
Total	...	19171316
IDCO charges @ 10%	...	1917132
GST @ 18% on IDCO chg.	...	345084
Grand Total	...	2,14,33,532

You are, therefore, requested to deposit a sum of Rs.28,27,147/- with IDCO towards payment of dues in respect of Ac.3.94 land for eventual payment to the Tahasildar, Chhendipada. Further you are requested to deduct the TCS from IDCO administrative charges.

Yours faithfully,
[Signature]
Land Officer

Memo No 3665 /Dtd. 25-02-2021

Copy to Tahasildar, Banarpal for information and necessary action with reference to his letter No.7241 Dt.28.09.2020.

[Signature]
Land Officer

Orissa Industrial Infrastructure Development Corporation

(A Government of Orissa Undertaking)
IDCO, LAND DIVISION, IDCO TOWER, JANPATH, BHUBANESWAR-751022, ORISSA, INDIA
+91- 674-2544180(O), EPBAX-2540820, FAX: +91 674 2542956/2541982,
E-mail: cgmland@idco.in/sushanta.mohanty@idco.in, Website: www.idco.in

Sumitra Kumari Pattnaik, OAS-(S)
Land Officer



No.HO/P&A-LA-E- 4068/19/VOL-VI/

3935

Dated 01- March, 2021

To
M/s.Jindal Steel & Power Ltd.,
Plot No.3, Forest Park,
Bhubaneswar-751009.

Sub:- Deposit of Royalty against acquiring the Jamunda
Jungle Stone Quarry No.1.

Ref.:- Demand letter No.7241 Dtd.28.09.2020 of Tahasildar,
Banarpal.
This Office letter No.13021 Dtd.12.07.2012
This Office letter No.3664 Dtd.25.02.2021

Sir,

Please refer to the letters cited above on the captioned subject in which demand note has been issued in your favour for payment of required dues relating to extinction of sairat source in respect of village Jamunda Jungle pertaining to Khata No.1, Plot No.763 as per the details given below in consonance with the letter No.7241 Dtd.28.09.2020 of Tahasildar, Banarpal.

Royalty: 128000 Cum. @ Rs.130/- per Cum.	...	16640000
Dead Rent	...	35316
DMF (10%)	...	1664000
EMF(5%)	...	832000
Total	...	19171316
IDCO charges @ 10%	...	1917132
GST @ 18% on IDCO chg.	...	345084
Grand Total	...	2,14,33,532

In the last paragraph, the demand amount inadvertently mentioned as Rs.28,27,147/- in place of Rs.28,27,147/- which may please be read as Rs.2,14,33,532/-.

You are, therefore, requested to deposit the required amount of Rs.2,14,33,532/- (Rupees Two crore fourteen lakh thirty-three thousand five hundred thirty-two) only with IDCO towards payment of the value of minor minerals available in the source to the Tahasildar, Banarpal after deducting TCS from IDCO administrative charges.

Yours faithfully,
01.03.2021
Land Officer

Memo No. 3936 Dtd. 01-03-2021

Copy to Tahasildar, Banarpal for information and necessary action with reference to this Memo No.3665 Dtd.25.02.2021.

Land Officer

Orissa Industrial Infrastructure Development Corporation

(A Government of Orissa Undertaking)

IDCO, LAND DIVISION, IDCO TOWER, JANPATH, BHUBANESWAR-751022, ORISSA, INDIA
+91-674-2544180(O), EPBAX-2540820, FAX: +91 674 2542956/2541982,
E-mail: cgmland@idco.in/sushanta.mohanty@idco.in, Website: www.idco.in

O/C

JINDAL
STEEL & POWER

Date: 23.03.2021

JSPL/BHU/IDCO/21/025

To

The Chief General Manager (Land)
Odisha Industrial Infrastructure Development Corporation
IDCO Towers, Janpath
BHUBANESWAR – 751022

Subject: Deposit of Royalty against acquiring the Jamuda Jungle Stone Quarry no1.

Ref: HO/P&A-LA-E4068/19/Vol-VI/3664 Dated 25.02.2021

Sir.

With reference to the above cited letter on the captioned subject, we have already deposited Rs 2,14,04,775/- (Rupees Two Crore Fourteen lakhs Four Thousand Seven Hundred Seventy Five only) through RTGS reference no: SBINR12021032317183970 dated 23.03.2021. After deducting TDS @ 1.5 % Rs 28,757/- from IDCO admin charges of Rs 19,17,132/-

This payment is for deposit of Royalty against acquiring Jamuda Jungle Stone Quarry in respect of our leased land of Tahasil Banarpal.

The receipt of the same may kindly be acknowledged.

Thanking you

Yours sincerely

For Jindal Steel and Power Limited

Pulin Kumar Sahu
Pulin Kumar Sahu

DGM (Corporate Affairs)

Encl: DD as mentioned above.

Jindal Steel & Power Ltd.

Bhubaneswar Office : Plot No. 3, Forest Park, Bhubaneswar-751009, Odisha
T 0674-2595262, 2596219, F 0674-2596119, W www.jindalsteelpower.com
Registered Office O.P. Jindal Marg, Hisar, 125005, Haryana

CIN-L27105HR1979PLC009913

Re: O.A. No. 83 of 2025 || Service of Counter Affidavit on behalf of Respondent No. 2

Sandip Agarwal <mailsandipagarwal@gmail.com>

Thu, Sep 11, 2025 at 5:55 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,
C/O: Shri Bala Krushna Pattanaik Trust
6th Lane, Amalapada, Angul-759122
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
O.A. No. 83 of 2025
In the matter of:
Satam Patnaik ...Applicant
versus
State of Odisha and Ors. ...Respondents**

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

Sir,

Please find attached the scanned copy of the Counter Affidavit along with all its annexures 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

--

SANDIP AGARWAL & COMPANY, ADVOCATES
Ground Floor, Room No.10,
10, Old Post Office Street,
Kolkata – 700 001.
West Bengal, India
PH: 033 2210 0583, 033 4005 6115
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 **Counter Affidavit for R2_O.A. No. 83 of 2025.pdf**
8687K

BEFORE THE HON'BLE NATIONAL
GREEN TRIBUNAL

EASTERN ZONE BENCH, KOLKATA

Original Application No. 83 Of 2025

Satam Patnaik

...Applicant

Versus

State of Odisha & Ors.

...Respondents

**COUNTER AFFIDAVIT ON BEHALF OF
JINDAL STEEL/ RESPONDENT NO. 2 TO
THE ORIGINAL APPLICATION FILED BY
THE APPLICANT**



SANDIP AGARWAL & CO.
Advocates,
10, Old Post Office Street,
Ground Floor, Room No.10,
Kolkata-700 001.
M:9831087781
mailsandipagarwal@gmail.com