

GOVERNMENT OF INDIA MINISTRY OF MINES INDIAN BUREAU OF MINES Office of the Regional Controller of Mines

No. AP/VZNR/MP/Mn-103/HYD

6th Floor, CGO Towers, CGOComplex, Kavadiguda, Secunderabad- 500 080, AP. Date:

To

Shri V.S.Sivaji Raju, Authorised signatory, Plot no.28, D.no.9-39-4, Pithapuram Colony, Visakhapatnam-530 003 Andhra Pradesh.

Sub: Submission of Modified Mining Plan in respect of Perumali Manganese mine of M/s Dharani Minerals over an extent of 10.056 Ha(25.96 Acres) situated in Sy.nos 119/13, 120/1, 121/1, 123/P, 138/19, 116/5, 139/4(P), 143/29,30,31 of Perumali Village and 8/1 to 4 of J.Kothavalasa Village of Therlam Mandal, Vizianagaram Dist. of Andhra Pradesh State under Rule 17(3) of MCR, 2016.

Ref: Your letter no. Nil dated 16.12.2017.

Sir,

With reference to your letter cited above on the subject, the site inspection was carried out on 27.12.2017 by Shri M.Pratap Reddy, AMG accompanied by V.S.Sivaji Raju, Authorised signatory and ,Shri, P.R.Mishrar Qualified Person. The draft Modified Mining Plan has since been examined and found certain deficiencies in the form of Scrutiny Comments as given in Annexure. The scrutiny comments have already been forwarded on your e mail id: dharanimineralsvzm@gmail.com and Qualified person's mail id earth environment2008@yahoo.com as submitted in the document.

- 02. You are advised to attend the above deficiencies as per the annexure and resubmit the document complete in all respect in three bound copies along with soft copy in the form of CD (2 Nos.). In this regard you are directed to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities at Rs. Three lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs. Ten lakhs as per the provision of Rule 27 of MCDR, 2017 only at the time of submission of final copies of the document.
- 03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

Yours faithfully,

Encl:a/a

(Pankaj Kulshrestha) l Controller of Mines

Copy : Sri P.R.Mishra, QP, Earth & Environment, S-27, Chandralok Market Complex, Niladri Vihar, Chandrashekarpur, Bhubaneswar-751021, Odisha.

(Pankaj Kulsreshtha) Controller of Mines.

Copy to the Controller of Mines (SZ), IBM, Banguluru, Karnataka, for kind information,

(Pankaj Kulsreshtha) Controller of Mines. Scrutiny comments on examination of Modified Mining Plan in respect of Perumali Manganese mine of M/s Dharani Minerals over an extent of 10.056 Ha(25.96 Acres) situated in Sy.nos 119/13, 120/1, 121/1, 123/P, 138/19, 116/5, 139/4(P), 143/29,30,31 of Perumali Village and 8/1 to 4 of J.Kothavalasa Village of Therlam Mandal, Vizianagaram Dist. of Andhra Pradesh State submitted under Rule 17(3) of MCR, 2016.

Date of Inspection: 27.12.2017

Inspecting officer: M.Pratap Reddy, AMG.

Accompanying officials: Shri V.S.Shivaji Raju authorized signatory and P.R. Mishra Qualified

person

General:

- 1. The cover page should be displayed with total lease area details, land type, Rule under which the document has been submitted, Plan period, complete address of the lessee and Qualified person. The title of the firm mentioned in Text and elsewhere differs from the name mentioned in the Registrar of Firms. The resolution passed in favour of V.S.Shivaji Raju is not in the standard format.
- 2. While examining the document it is observed that the Partnership deed has been reconstituted where in one Partner has relinquished and three new partners have joined indicating that there is substantial change in Ownership of the lease which may attract the Rule 24 (b) of Mineral Concession Rules , 2016. In this regard consent if any from the State Government has been sought?
- 3. The ML area has been spread over into six distinct and discontinuous blocks Viz Three blocks in the Perumali Village (Sy nos. 119/13, 120/1, 121/1, 123/P, 138/19, 116/5, 139/4(P), 143/29, 30,31) and another three blocks in J.Kothavalasa Village(Sy.nos 8/1 to 8/4). The boundary pillars of all the blocks have been erected and the same have been found on the ground. However, during the site inspection it has been observed that the Geo coordinates of few boundary pillars have not been established and the same have been kept open.
- 4. All the documents that were annexed in the earlier approved document which was revoked be again enclosed for the clarity sake. These annexures be properly addressed in the text in the relevant paras with the Annexure nos.
- 5. The lease sketch enclosed with the document is hazy/blur and few of blocks have not been properly closed with authenticated Geo coordinates which need to be certified by the competent authority. All the Plans and sections be prepared in confirmation with the authenticated lease sketch issued by the competent authority.
- 6. The Second five years block commences from 2017-18 and accordingly the yearwise schedules be drawn.
- 7. No field tests/Mineralogical study covering the aspects Bulk density and Recovery tests has been carried out for the purpose of the Reserve estimation. This need to be carried out by the Government Agency/NABL. A Report of the same be annexed to the document.
- 8. None of the Form-K have been signed by the Geologist for its correctness.
- 9. The Certificates have not signed by the Qualified Person.
- 10. Para 1.0(a) Name of the Lessee: Asper the Deed of partnership Reconstitution dated 1.5.2017, Sri Seetharama Raju is no valid Partner in the Dharani Minerals. IBM registration no. has not been furnished.
- 11. Para 2.0 a) (Lease details): The postal address of the lease area be properly furnished. Along with the Firm name, the authorized/nominated person's name be furnished. The correct Email id of the lessee be furnished.
- 12. Para 2.0 b) (details of lease area/ Lease area with location Map): Village/Sy.no wise extent be furnished. The Ownership occupancy be properly referred (either Govt waste land or Private land or reserve forest etc.). The approach to the ML area from NH to the ML area be discussed. The extent furnished under various heads be checked once for its correctness.
- 13. Para 3.1(Date and reference earlier approved MP/SOM)details of approved MP/SOM): The approved Mining Plan has been revoked and the same may be mentioned with effective date.
- 14. Para 3.3(Review of earlier approved proposals----): The deviation furnished to be nil. Instead of the nil, the reason be furnished.
- 15. Para 3.4(Status of compliance of the Violations-----): The violations and compliance thereof during the review period be furnished in Tabular form. The copies of relevant violations and replies

and mode of compliance thereof be furnished. The Violations and rep[lies be furnished in the form of Annexures.

PART-A

- 16. Para 1.0 a (Briefly describe the topography-----): The block wise relief of the area has not been mentioned.
- 17. Para 1.0 b (Regional Geology-----): The formations occurring in the area has not been properly equated with the Regional Geological setup.
- 18. Para 1.0 d Name of prospecting/exploration agency: The Technical person name under whom, the exploration has been carried out be given.
- 19. Para 1.0 e) i) (No. pits and Trenches-----): The Block wise old pits with dimensions be furnished
- 20. Para 1.0 e) ii) (No. of Boreholes-----): The details of Block wise boreholes drilled be furnished. None of the Form-K has been authenticated/certified..
- 21. Para 1 e) iii) (Details of sample analysis----): The surface sample locations have not been marked in Geological Plan. The no. of Core samples have not been indicated.
- 22. Para 1 f, g & h) (The Surface Plan-----, Geological Plan ------, Geological Sections----): The scale of Plans and Sections is said to be 1:1000 but whereas the Plan and Sections are on 1:2000 scale.
- 23. Para 1 I) (Broadly indicate the future programme of exploration---): As per the ministries guide lines and under Rule 12(4) of MCDR, 2017, in case of existing mining leases, detailed exploration (G1 level) over the entire potentially mineralised area under the mining lease shall be carried out within a period of five years from the date of commencement of these rules. Accordingly, a purpose oriented/need based exploration be proposed in the mineral bearing area. In case of inclined boreholes, the direction of inclination (Azimuth) be indicated.
- 24. Para 1.0 J) (Reserves and Resources----):
 - 1) The type of the deposit be properly classified/identified as per the norms of Mineral (Evidence of Mineral contents) Rules 2015
 - 2) The block wise Cross sections drawn be mentioned
 - 3) At the first instance, the scale of the exploration be marked on the Geological Plan based on the density of Boreholes and the same be also marked in the respective Geological Sections
 - 4) The depth of the mineralistaion is said to be upto 58.3mRL, but this varies from Borehole to borehole. Therefore a range of depth (min & max) with reference to the Borehole be indicated. Depth be restricted upto bottom intersection of ore body of the respective borehole
 - 5) A detailed report with the quantities of the excavated material during the field test for arriving recovery factor and bulk density has not been furnished. Locales of such pits dug for field tests be shown in the Geological Plan. While calculating the reserve/resources these factors (Bulk density and Recovery %) have not been taken into account. The estimation of reserve/resources should be based on these field tests.
 - 6) The Bulkdensity of 3.26 mentioned is on higher side. The recovery % it self speaks about the nature of the ore that is occurring in the area.No Mineralogical study report is enclosed with the document.
 - 7) The core drilling and borehole density etc should be dealt under 'Technological' sub head of Geological axis.
 - 8) The various figures given under operating cost/T in Feasibility axis be checked for its correctness.
 - 9) The approved Mining Plan is invalid since it has been revoked. Therefore no reference be given.
 - 10) The feasibility axis be assigneed'2' since the mining operations in the mine are yet to commence.
- 25. Para 1.0 k)(Furnish detailed calculation of reserve ------): All Reserve/Resource need to be reassessed as per the comment vide para 1.0 J) taking into account of Recovery factor and

Bulk density arrived during the field tests. The basis of grade wise recovery and sub grade estimation has not been spelled out.

- 26. Para 2 a (Briefly describe the existing as well as proposed method------): Present status of working should be submitted incorporating, dimension of quarry, top RL, bottom RL, No. of benches in ore & waste, bench height & width etc. Block wise quarries and dumps be given The approved quantity of ROM by the EC be mentioned and copy of the same be appended. The deployment of wagon drill with regards to drilling and blasting be reviewed depending the bench parameters proposed. The production schedule be reviewed asper the comment vide para 1.0 J.
- 27. Para 2 b (Insitu tentative excavation----): The area demarcated for the year wise tentative excavation be proposed as per the G1 scale of exploration as demarcated vide para 1.0 J. with well defined grids.
- 28. Para 2 c (Individual Year wise ----): The year wise layout of mine working should be discussed in the text part supported by bench wise calculations of proposed excavation of Ore and OB with the aid of Plans and sections. The production proposals for the year 2017-18 be restricted to the left over period i.e 3 months only..
- 29. Para 2 d) (Describe briefly giving salient features---): The proposed bench height and width be checked once. The width of the bench should be more than the height of bench.
- 30. Para 2f(Conceptual Plan----): This para be reviewed as per the outcome of the para 1.0 k)
- 31. Para 4.0 Stacking of Mineral reject/subgrade mineral----: This para be reviewed asper the comment vide para 2 b.
- 32. Para 8.3.1 Mined out land: The mineral is yet to exhaust at depth and thus there is no mined out land and there is only degraded land.
- 33. Para 8.4 (Disater management and Risk-----): The contact persons name be mentioned
- 34. Para 8.6(Financial Assurance): In view of the above comments, the F.A. should be reassessed and submitted as per Rule 27 of MCDR,2017along with final copies.

Annexures:

Name of the person be mentioned below his signature in all certificates and consent letter Annexure X is illegible

Annexure X: None of the Form-K's have been signed/certified by the competent person. The chemical analysis column is kept blank.

Annexure XIII: The NABL accreditation validity is missing.

Annexure XV: Feasibility study Report: Feasibility study report be reviewed as per the comment vide para 1.0 J)

PLATES

- 1. Plate-I Key plan:. The ML area be distinctly marked. The Plan should be as per the provision of rule 28 of MCDR,2017, the area of 5 KMs around the lease area should be considered and all the details within this area as per statute should be incorporate. The existing mines with in 5km radius be shown. The extremities of the coordinates have not been drawn.
- 2. Surface Plan, Geological Plan, Sections, Production and development and sections there of other Plans be prepared on 1:1000 scale for the better clarity.
- 3. Plate-III (Surface Plan): The date of survey has not been updated. The Surveyor certificate no. has not been furnished. The quarries and Dumps have not been properly shown and numbered.
- 4. Plate-IV Geological plan: The Boreholes have not been properly indexed. The scale of exploration and strike and dip have not been marked. The Plan be updated as per the comment vide para 1.0 J. The. UPL be redrawn.
- 5. Plate-IV A Geological Sections: The Sections be redrawn as per the Geological Plan and comment vide para 1.0 J. All the sections be checked once for the correctness plotting of the Geological contacts and ore body intercepts in the Boreholes. The intercepts of dumps, roads and nallas have not been shown along the profiles wherever they intercepted. The UPLs have also not been properly drawn.
- 6. Plate-V A to V E: Year wise development plans and sections, Plate VIII: Reclamation and Rehabilitation Plan, Plate-IX: Progressive Mine Closure Plan and Plate-X & X A: Conceptual Plan and Section: These Plates be modified asper the comment vide para 1.0 J. In the yearwise development sections, the formation of benches have not been shown (Plate VIA to VIE)
- 7. Plate-VII Environment Plan: Prominent wind direction has not been shown. Contours have not been extened up to 60m buffer zone. Land use pattern in the buffer zone has not been properly shown and indexed.
