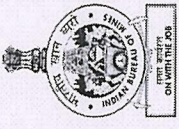




भारत सरकार/Government of India
खान मंत्रालय/Ministry of Mines
भारतीय खान ब्यूरो/Indian Bureau of Mines
हैदराबाद क्षेत्रीय कार्यालय/Hyderabad Regional Office



Phone No. : (040)-27539992/2753993
Fax No.(TF): (040)-27539991
E-Mail : ro.hyderabad@ibm.gov.in
No. AP/VZNR/MP/Mn-86/Hyd

To

Shri Asok Konda,
M/s S.K. Sarawagi & Co.,
Sarawagi House, Kaspa Street,
Chipurupalli – 535 128
Vizianagaram District,A.P.

Room No.603, 6th Floor,
CGO Towers, Kavadijuda,
Secunderabad – 500 080
Date:

Sub: Submission of Review of Mining Plan in respect of Karlam Manganese Mine of M/s S.K. Sarwagi & Co. Pvt. Ltd., over an extent of 17.63 ha in Karlam (V), Cheepurupalli (M), Vizianagaram District A.P. submitted under Rule 17(2) of MCR, 2016.

Ref: Your letter no. nil dated.06.03.2019

Sir,

With reference to your letter cited above on the subject, inspection of the mine was carried out on 31.03.2019 by Shri Ibrahim Sharief, Sr.ACOM, and found certain deficiencies as given in Annexure. The same scrutiny comments have already been forwarded to you and your Qualified Person on respective e.mail ids i.e., asokkonda@sarawagi.com mines@sarwagi.com and bsgangarao@yahoo.com.

02. You are advised to attend these deficiencies as per the annexure and resubmit the document, complete in all respects, in three bound copies along with soft copy in the form of CD (2Nos.). 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 @ 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(1) of MCDR, 2017 at the time of submission of final copies of the document within 15 (fifteen) days from the date of issue of this letter, failing which the document will be disposed without giving any further opportunity.

03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

Yours faithfully,

Shailendra Kumar
9/4/19

(Shailendra Kumar)
Regional Controller of Mines

Copy Dr. Ganga Rao. B.S., QP Flat No. L-1, Meher Apartment, VIP Road, CBM Compound,
Visakhapatnam 530 003 - for information and necessary action.

Shailendra Kumar
9/4/19

(Shailendra Kumar)
Regional Controller of Mines

मूल पति पर नहींकः

खान नियंत्रक (द), भारतीय खान ब्यूरो, बंगलुरु।

शैलेन्द्र कुमार
9/4/19

(शैलेन्द्र कुमार)
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SCRUTINY OF REVIEW OF MINING PLAN ALONG WITH PROGRESSIVE MINE CLOSURE PLAN SUBMITTED IN RESPECT OF KARLAM MANGANESE MINE OF M/S S K SARAWAGI & CO. PVT. LTD. OVER AN EXTENT OF 17.63 HA. IN KARLEM VILLAGE CHIPURPALLI MANDAL, VIZIANAGARAM DISTRICT OF ANDHRA PRADESH

1. The document is submitted without proper survey :-
During inspection of mines it was observed that
 - i. No. Of benches varied from 2 to 7 in the mining pits with pit depth of 15 to 17 meters is observed which is contradiction to your submission of pits of 2 to 4 meters depth.
 - ii. Contours, pits, bench MRL's and other surface features are not demarcated as per actual field condition.
 - iii. Thick vegetation of cashew and Mango Trees existing in the ML area, but the same is not demarcated in the plans.
 - iv. Road connected to mine is not demarcated properly as per field conditionThe above needs to be addressed with complete observation, re-survey of the Mining lease area.
2. Total area of 5.5 Ha had been reported as degraded in the annual return for the year 2017-18 is contradictory to your submission of 1.06 Ha area degraded at the start of plan period i.e. 2019-20, for computation of financial assurance. The discrepancies in this regard needs clarification.
3. Refer page no. 20, para 7 item (3.0), resources had been estimated by considering drilling core bore holes at 25 m to 50 meters interval. As per your submitted plan, the bore holes are more than 50m apart in the plans (refer plate no.III). Thus your contention of drilling bore holes in G1 level for pocket/vein/ lenticular type ore body is incorrect as per MEMC rules 2015.
4. Records of bore holes drilled has not been maintained properly for verification in the field. Further it is also observed that pieces of external manganese ore had been found placed in the core boxes to create an impression that the drilled length is intersecting mineralised area.
5. Resources estimation has got the following deficiencies which needs proper recasting.
 - (i) Improper survey data,
 - (ii) Improper exploration for delineation of this type of ore body for reserves estimation under MEMC Rules 2015/ UNFC.
 - (iii) Incomplete recovery test.
 - (iv) No meter wise analysis of bore holes/ trails pits.
 - (v) Threshold value as declared by IBM for Manganese ore is not considered.

6. 9 (Nine) no. of Manganese veins are demarcated against single vein established in earlier approved mining Plan without detail exploration as required under MEMC Rules 2015. To be clarified.
7. In float ore, only core bore holes and systematic pitting and trenching is acceptable. Further DTH bore holes reported to be drilled for assessment of float ore, pocket/ vein/ lenticular type ore body cannot be acceptable as the same is communicated to you by this office letter dated 29.11.2018.
8. Only economic mineable part of mineral reserves categorised under 111, 121,122 (codes of UNFC) will only be considered for production proposal. Whereas your submission of enhancement of production is based on mineral resources under 211 category of UNFC, which is not acceptable (refer page no.30).
9. Lab analysis report doesn't incorporate the details of Bore hole wise, meter wise information; Due to which it is not clear from where the samples have been collected.

Review

10. Review of earlier approved proposals and achievement against the same for the corresponding period should be furnished for ready reference.
11. Monthly returns for the months from August 2007 to November 2008, Annual return 2007-08 with supporting documents should be submitted.
12. Copy of Annual returns for the review period should be submitted for verification.
13. Violation were pointed out by IBM vide letters dated 18/07/2008, 10/08/2011, 03/06/2013, 21/08/2013 etc. but details of the same are not furnished.

Mining

14. Details of top soil generation should be proposed in the year wise development proposals.
15. In conceptual plan, life of the mine should be revised after estimation of reserves under UNFC guidelines.

Mineral Processing

16. It is proposed to process the ore but details of process flow sheet indicating quantity and grade has not been furnished.
- PMCP
17. Review of PMCP approved should be furnished.

18. Details of Base line data, EIA/ EMP as per approved EC should be furnished. Further enhancement of production from 1500 MT/ annum to 33,000 MT/ annum is proposed, but its impacts on surrounding area and environment management plan to mitigate the impacts has not been prepared and submitted. The same should have been prepared by an Agency accredited by MOEF.

19. Time schedule for abandonment of mine submitted is impractical, the same should have been furnished considering statute and time period required for compliance.

Plans and sections

20. Key plan should have been submitted on SOI topo sheet indicating the lease area with details as per provision of rule 32(5)(a) of MCDR 2017.

21. UPL is demarcated in non mineralised zone in Geological sections up to depth of 70m whereas the ore body depth is shown as 4.0 meters. To be clarified

22. Pits, dumps, bench RL's are not legible in plans and sections.

23. Plans and sections should have been prepared on 1:1000 scale for ready reference.

24. Conceptual plan should be prepared; indicating the details containing outlines of pits, waste dump, stacks, reclamation/ rehabilitation, if any, at the end of plan period as well as at the end of life of the mine.

25. Financial assurance plan should be modified based on updated survey of the lease area. Accordingly financial amount should be suitably modified.

In view of the above relevant para, plans and sections should be suitably modified.

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