

Discrepancies observed in the Review of Mining Plan of Nawargaon Chowa Kyanite Mine (Area-40.61 Hect.) of M/s MSMC Ltd., located in Distt. Bhandara (Maharashtra), submitted under Rule 17(1) of MCR, 2016 (based on MCDR inspection done by the undersigned on 07/03/2017)

Text and Plates:

1. Date of survey is 04/12/2013 which is quite old and no fresh survey has been carried out.
2. Enclosed lease deed is for 101.21 acre (40.96 ha) whereas the area of the lease is 40.61 ha. It is mentioned in the introduction that lease has been renewed vide Govt. Of Maharashtra order no. MMN-1007/C. R. 2280 Ind-9 dated 22/08/2007 and as per the order, lease should have been executed within 6 months from 22/08/2007 but the lease hasn't been executed yet. Thus no valid executed lease deed is there for the lease area.
3. Out of 40.61 ha, 0.40 ha area is under Govt. Protected forest area but no forest clearance has been neither enclosed with the document nor submitted to this office till date. Also in the land schedule of the area given on cover page and at various places in the document, 'No' forest land is mentioned which is incorrect.
4. Land schedule has not been mentioned clearly on page no. 4. Further, status of surface rights for private land hasn't been informed.
5. It is mentioned that lease area has been corrected through order dated 22/08/2007 but in the Environment Clearance granted on 20/10/2007, lease area has been mentioned incorrect as 40.96 ha.
6. Also, EC has been granted for 5000 TPA from the lease area. But proposed production from the lease area is more than 10000 TPA (refer page no. 26). For production, ROM has been considered because as per Part-VI of the Annual Returns, complete ROM ore is saleable including low grade and mineral rejects.
7. Production has been carried out in the suspension period of 2014-15 (as per Annual returns).
8. Incorrect information mentioned under item 3.5 on page no. 12.
9. At places, details for minor minerals (specially 'Pyrophyllite) have been given in the document. Also instead of 'Review of Mining Plan', 'SOM' is mentioned at places.
10. No exploration has been done in compliance to the proposals made in the approved document. Reason for the deviation is mentioned as 'mining operations remained suspended'. Mining operations remained suspended from 15/11/2011 to 30/01/2013 under Rule 13(2) of MCDR'1988 for carrying out mining operations without a valid or approved document. Again, Mining operations remained suspended from 30/10/2013 to 19/02/2016 under Rule 13(2) of MCDR'1988 due to non-compliance of CCOM Circular 2/2010. In between production has been carried out but exploration has not been done.
11. Proposed exploration is not as per Rule 12 of MCDR'2017.
12. Basis of consideration of reserves need to be given mentioning the depth upto which reserves/resources have been considered, economic or feasible limits, B D. for mineral and rejects etc.
13. Feasibility report enclosed is not as per the provisions of the Mineral (Evidence of Mineral Content) Rules'2015.
14. Detailed Lithology mentioning thickness for each geological entity occurring in the lease area has not been given.
15. Blocked resources have been considered for 50 m from the canal but working is extended in the blocked zone. Working Pit is approximately 20 m from the Canal which is not as per Rule 12(d) of MCR'2016.

16. For resources blocked in pit slopes, blocked area on either side should be approximately 364.5 sqm as per below calculations:
Area= $0.5 \times 27 \text{ m} \times 27 \text{ m} = 364.5 \text{ sqm}$
Ultimate pit depth upto conceptual period is upto 233 mRL i.e. 27 m from 260 mRL
Thus tonnage blocked= $364.5 \text{ (area)} \times 6 \text{ (W)} \times 2.8 \text{ (B.D.)} = 6123.6 \text{ T}$ on each side
Total blockage due to pit slope should be= $2 \times 6123.6 \text{ T} = 12247 \text{ T}$
But on page no. 20, it has been estimated as 9979 T which is incorrect.
Similarly, Blockage in the 50 m of canal should have been 22680 T approximately:
Blocked Resources= $27 \text{ m (depth)} \times 50 \text{ m} \times 6 \text{ m (W)} \times 2.8 \text{ (B.D.)} = 22680 \text{ T}$
Whereas these blocked resources have been considered for one side of the canal only.
Thus either total blocked resources have not been estimated correctly or part of blocked resources have already been exploited (Pit-1 extended beyond 7.5 m barrier zone and Pit-5 extended into the blocked zone of canal).
17. Reported resources on page no. 23 are for Kyanite and Pyrophyllite both. Reserves for Kyanite have not been given separately.
18. Proposed exploration is within 50 m blocked zone of canal as per geological plan which shall be of no use even if the mineral is proved.
19. On page no. 28 in the first line, it is mentioned that pit will be further deepened to 12 m in the conceptual period which is incorrect. Actual deepening shall be for 6 m only from 239 mRL to 233 mRL.
20. Working has been proposed beyond water table. Hydro geological study in compliance to EC specific condition (ii) has not been enclosed for the area.
21. It is motioned on page no. 25 that Dumps D-1, D2, D3 and D4 shall be re-handled but detailed management for re-handled waste has not been discussed in the document. Further, on page no. 28 under (iv), it is mentioned that pit 5 which is extended in the blocked zone of canal shall be backfilled for 1100.65 sqm and 172.44 sqm already excavated area in the 7.5 m non-mining zone shall be backfilled but the same has not been discussed in detail regarding source of material etc. On page no. 31, only a brief detail has been given for existing dumps, re-handling and backfilling. But management of re-handled waste (2960.67 cuM) and generated waste (51316 cuM) has not been given.
22. Use of mineral/mineral rejects as discussed is theoretical only whereas actually mineral rejects are also saleable for the area. The same has not been mentioned.
23. Environment monitoring for various environmental parameters is not being done as per the conditions of EC. No reports pertaining to the monitoring data has been enclosed.
24. Additional area required for mining/pits and for dumps has been mentioned incorrect in the FA table on page no. 44. Actual area shall be more than what is mentioned in the table.
25. Submitted FA for Rs 1 lakh has been expired on 31/03/2017 and as on date no valid FA is existing for the area.
26. Authenticated lease plan has not been enclosed in compliance to CCOM Circular 2/2010.
27. Photo Identity Card of Lessee/Nominated Owner with permanent address proof has not been enclosed with the document.
28. Annexure-7 enclosed for analysis of Kyanite in the area is vague. It's not in form of certificate; NABL accreditation of the analyzing agency is not mentioned and is not pertaining to the lessee/lease area under consideration.

(Ashish Mishra)
ACOM-NR