

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

No. AP/ADB/MP/Mn-15/Hyd

Room No.603, 6th Floor,  
CGO Towers,Kavadiiguda,  
Secunderabad.-50008  
Date: 9-7-18

To  
Shri Binod Kumar Jain, Nominated Owner,  
M/s. Aditya Minerals Pvt.Ltd.,  
1-1-45/C/61, Housing Board Colony,  
Adilabad -504001,  
Telangana State.

Sub: Submission of draft Review of Mining Plan in respect of Pipalgaon Manganese Mine of M/s. Aditya Minerals Pvt.Ltd, over an extent of 20.36 Hc. in Survey Nos. 32 to 35 of Pipalgaon Village, Jainath Mandal, Adilabad dist., Telangana State submitted under Rule 17(2) of MCR, 2016.

Ref: Your letter no. AMPL/IBM/2018-19/16, dated 09.06.2018.

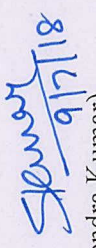
Sir,

With reference to your letter cited above on the subject, the site inspection was carried out by Shri Ibrahim Sharief, Sr. Assistant Controller of Mines on 23.06.2018 accompanied by Shri K.U.Jenekar, QP & Manager, the draft Review of Mining Plan has since been examined and found certain deficiencies as given in Annexure. The same scrutiny comments have already been forwarded on email id of you and your Qualified Person as submitted in the document. [amaurfb1@gmail.com](mailto:amaurfb1@gmail.com) and [kjenekar\\_rqp@yahoo.com](mailto:kjenekar_rqp@yahoo.com).

02. You are advised to attend the 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 and @ Rs.Two Lakhs/hectare for category 'B' mines provided that the minimum amount shall be Rs.Five 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 and the manner in which the deficiencies are attended should be given while submitting modified document.

Yours faithfully,

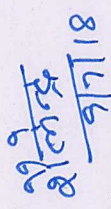
  
(Shailendra Kumar)  
Regional Controller of Mines

Copy for information & necessary action to Shri K.U.Jenekar, Qualified person,

Encl:a/a

  
(Shailendra Kumar)  
Regional Controller of Mines

मूल पति पर नही  
खान नियंत्रक (व), भारतीय खान ब्यूरो, बेंगलुरु।

  
(शैलेन्द्र कुमार)  
क्षेत्रीय खान नियंत्रक



Observation

1. it was observed that the surface plan was last updated was reported to be about four years back and no survey was carried out thereafter, but the mine has been developed both in lateral as well as in depth ward and substantial quantity of waste and ore was also exploited and also waste was backfilled. Now the document furnished based on old updated plan which is found not matching with actual field condition like extent of pit, waste dumps, backfilling, RL's etc.. Further based on the above estimation of reserves and development & production proposals were proposed, which cannot be acceptable as these will not represent actual field condition.
2. Development & backfilling operation which is about 90 % of total exploitation/ reclamation activity, is being carried out by deploying machineries, remaining activity of ore sorting and sizing, stacking is by manual means. Hence the category of Mines should have been upgraded to Category-A, OTFM Mines instead of manual mines.
3. It is submitted in the text part of the document that there exist 5 no. of pits in the lease, whereas in plans above pits were not depicted properly.

Text

4. Rules should be quoted correctly as per new notification and amendments.
5. The list of mining leases held by M/s. Aditya Minerals Pvt. Ltd., already held by the applicant/applied area should be indicated in the mining plan indicating type of Minerals, areas, location, etc. as per the following format.

Sl.No.	Lease reference no. & date	Postal address/location	Mineral	Lease gent	Lease period

6. Refer page no.2, Land schedule of the lease should have been furnished as per the manual.
7. Address, mail id submitted in the document furnished should be as per registered mail (Under rule 45 of MCDR 2017) and address communicated officially, if any changes same should be communicated to this office and submit in the document.
8. The lithologs of the trial pits submitted to this office should be furnished in the document, the above details duly authenticated should be furnished.
9. Bore holes is stated to be drilled in the lease area during the Month of May 2018, but lithologs furnished in Form-J and that observed in core are in variance, which needs to be corrected as per core and submitted.
10. Color photographs of activities like Mining, Backfilling, Plantation etc. should have been submitted in the document.

Review :

11. Review of earlier approved proposal should be furnished in to-to for easy reference.
12. Large scale deviation in site for exploitation of ore, waste handling and backfilling is observed during field visit, but details of the deviations were not submitted. The above should be brought in to the document with proper justification.
13. Refer page no. 5, incorrect information like waste is utilized for backfilling, but external waste dump have been created.
14. Review of approved proposals in connection with year wise backfilling as per the table no.9, page no. 21, of the earlier approved plan, should also furnished.
15. It is stated that 8600 sq.m has been rehabilitated for agriculture purpose, but no such rehabilitated land was observed in the field.
16. Violation was pointed out by this office letter dated 06.08.2013, but compliance status of the same, whether complied or not, should have been furnished for easy reference.

Geology

17. Page no.7, para 1.a detailed as per the authenticated data available pertaining to region in which the lease area exist should be furnished.

18. Limestone is found exists above and below the Manganese ore zone, but chemical analysis of the same should have been furnished from Govt. accredited/ NABL lab to know its commercial use or not. Chemical analysis of some of the samples from cores bore holes drilled recently should also have been done for reference.

19. Page no.9, exploration carried out so far in the lease area should have been furnished in tabular form incorporating the details like Year, Type of exploration (Bore hole/ Trial pit/ Trenches), location (WGS 84), dimension/ depth, depth at which ore intersected, for easy reference.

20. Expenditure incurred for exploration carried out during review period should be furnished with supporting document.

21. Details of exploration carried out should be furnished in the tabular form as below

SL no.	Area explored under			Unexplored area (ha)	Total lease area
	G1 level (ha)	G2 level (ha)	G3 level (ha)		

22. The procedure followed for samples collection for the purpose of analysis is not as per the standard procedure, instead of splitting entire core ore samples in to two halves and to send one half for analysis, intermediate samples were picked from ore zone and sent for analysis, which is in-correct as it will not give the actual grade/ constituent of entire ore zone, the analysis furnished in table no.6 cannot be acceptable.

23. Reserve estimated based on incorrect logging of ore zone/ Lithologs and sample collected cannot be acceptable for reserve estimation. In this regard re-sampling of the entire ore zone should be done as per the standard procedure and get in analysed from NABL lab and submit.

24. As per the provision of rule 12(4) of MCDR, 2017, the entire potential mineralized area has to be explored under G1 level within 5 years from the date of notification of these rules, in this regard future explorer proposal should be submitted and in case of non mineralized area it has to be proved by bore holes for absence of mineralization, accordingly proposals should be submitted. As the ore body is dipping North-Western side few more bore holes should have been proposed to know the continuity of the ore body.

25. The details furnished in para 1.j, page no.22 are to be re-check in view of content at sl. no.32.

26. Geological sections prepared should be in consonance to the earlier approved document, if any change in this regard should be justified. Sections should have been considered in line with the bore holes drilled, trial pits dug etc. for easy reference.

27. Dip of the ore body found steep than that has been depicted in sections, which needs to be re-check and submit and submit as per actual field condition.

28. Factors considered for UPL should be detailed incorporating stripping ratio, depth of ore occurrence, OB handling, backfilling etc.

29. Justification of UNFC codes for reserve estimation are submitted is general and not the site specific to the lease area, which should be re-check and submit.

30. In page no. 13, Feasibility axis, status of statutory clearances like EC, Consent to operate, Consent to establishment, surface area held by the lessee etc. should be furnished with valid supporting document.

31. Basis of reserve estimated is not clear. additional factor like, stripping ratio, UPL should have been considered though the ore body encountered in BHS cd-1, cd-2, cd-5 and cd-6 is dipping towards North-Western side with OB of 2mtrs to more than 10 mtrs. In this regard recheck the reserves and submitted.

32. Refer page no.14, table no.8, detail computation of reserves estimation should be furnished in tabular form incorporating Section considered, RL(From to), Length of influence, Total excavation (cum), TS/OB (cum), Side burden (cum), ROM (cum) within this Ore & Mineral reject, Stripping ratio etc. for easy reference.

33. Reserves should have been arrived as on date by considering the reserves of earlier approved document deducting the production achieved during that plan period approved on last occasion and by adding additional reserves established based on exploration carried out if any. Reserves have been considered by considering cut-off grade of 20% Mn instead of threshold value of 10% Mn, which should be reassess and submit.
34. Recovery factor of 85% is considered for ore whereas the status remaining 15% is not dealt anywhere in the document.
35. Refer page no.14 it is submitted that about 332 tonnes of reserves will be blocked due to legal constraints, but during inspection and as per the geological section submitted no such reserves were indicated as blocked, which is to be re-check and submitted.
36. All the bore holes drilled in the lease should have been referred with WGS 84 grid lines for easy reference and is required for other purpose of this office.

#### MINING

37. Method of mining should have been proposed from category-B manual method to Category-A mechanised method in view of content at sl. no.2 accordingly pit configuration should be suitably modified.
38. Status of present mining activities in the lease area should be furnished incorporating the details like Pits, their dimension, no. of benches in ore and waste with their height and width, RL's etc. in para 2.A.a. Further reclamation and re-habilitation has also been reported to be carried out the status of the same should also be furnished.
39. Total production proposed in the next five years is submitted as 8213 cum, considering bulk density of 2.8 the total tonnage is 22,996 Tonnes whereas the total reserves estimates is 19,541 Tonnes. on higher side than that of the total reserves estimated.
40. In year wise development proposal,
- sections should be prepared inconsonance with geological sections, for easy reference.
  - there should be a gap between the area of exploitation and that of backfilling for safe & systematic mining,
  - it was reported that no mining activity is being carried out during monsoon this aspect should taken in to consideration in year wise development proposal
  - Detail computation of year wise development proposal should be furnished in tabular form as per content at sl. no. 32.
  - Bench height and width should have been proposed as per the statute.
  - Pit lay out for year wise development should have been described in para 2.A(d).

41. Grid lines in which the year wise development proposed furnished in the text and that depicted in development plans and sections is not matching, and are contradictory to one another.

42. It is reported that the entire ROM is being transported outside the lease, then there is no question of recovery of ore from ROM, production proposal should be suitably modified. This aspect should be taken in to consideration while estimation of reserves.

#### CONCEPTUAL Mining

43. Conceptual plan prepared is sketchy and has not been prepared as per the guidelines of IBM. Life of the mine based on the reserves estimated has not been computed, UPL has not been determined, reclamation and re-habilitation, dump management at the end of proposed period as well as at conceptual period has not furnished, UNFC guidelines has not been followed, requisite data as per the guidelines in tabular form has not been furnished, which needs complete re-casting of the chapter.

#### STACKING OF MINERAL REJECT AND DISPOSAL OF WASTE

44. Status of present dumps existing with the details should have been furnished in para 4.a.

45. It was observed during inspection that area recently backfilled has not been done as per the procedure furnished in page no.22, para 4.b, no leveling was not done with top soil spreading over the backfilled area, which needs re-grading of the area and top soil to be

spread over it, this area cannot be considered as reclaimed fully in the present submission.

#### USE OF MINERALS

46. Actual grade of ore available in the lease should be furnished with physical and chemical composition pertaining to Mineral reject, low grade and high grade for easy reference in para 5, page no.24.

#### PMCP

47. Review of earlier approved PMCP should furnished for easy reference.
48. Area degraded as observed in the field is on higher side that that of the area considered in page no.26, based on the updated survey the area degraded should be modified and submitted. further the area already backfilled should also be considered for calculation of F.A.
49. E.I.A and E.M.P as per MOEF guidelines should be furnished pertaining to lease area., para 8.1, 8.2 should be modified in view of the above
50. In Para 8.3.1, present status of area backfilled so far should be furnished.
51. Periodic monitoring as applicable to category mines should be furnished to be carried out in the present submission period.
52. Reclamation and rehabilitation is being proposed in the year wise development proposal, but details of the same like rehabilitation has not been furnished, if any.
53. Area degraded considered for financial assurance is on lower side, which needs to be re-calculated and submitted.

#### Plates

1. Copy of cadastral plan incorporating the lease area should be furnished.
2. A village road is passing through the lease area on North Western side, but the same is not depicted in plans.
3. Surface right area held by the lessee should be demarcated in Surface Plan for easy reference.
4. Plans and section submitted are not matching the actual field condition, survey has to be carried out afresh and submit the updated surface plan, based on the same all the plans and sections should be prepared and submitted.
5. In Geological Plan, mineralised area should demarcated properly, for easy reference.
6. Geological sections should be prepared for entire mineralized area and even old working also.
7. Year wise development plan and section should modified based on updated survey and content at sl. no.40.
8. Conceptual plan should be prepared incorporating the status of pit, dumps, reclamation & rehabilitation at the end of proposed plan period as well as at the life of the mine.
9. Reclamation plan should have been submitted instead of Environment Management plan.
10. Financial assurance plan should be modified based on updated survey and as per actual field condition. Financial assurance table should also be attached in the plan with different activities as per table depicting in different color for easy reference.
11. Photographs of lease pillars with no. and Co-ordinates duly marked should be furnished. In view of the above relevant para, plans and section should be suitably modified and submitted.