

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

No. AP/VZNR/MP/Mn-90/HYD

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

To

Shri Asok Konda, Nominated owner, M/s S.K.Sarawagi & Co.(P) Ltd, Sarawagi House, Kaspa Street, Chipurpalli-535 128
Vizianagaram district, AP.

Sub: Submission of Review of Mining Plan in respect of your Chinnaravyam Manganese mine over an extent of 4.055 Ha situated in Sy.nos 5(P),6/1,6/2, 6/3(P), 6/5, 6/6, 6/7, 9P and 10/2 of Chinnaravyam Village of Merakamudidam Mandal, Vizianagaram Dist. of Andhra Pradesh State under Rule 17(2) of MCR, 2016.

Ref: Your letter no. Nil dated 25.6.2018.

Sir,

With reference to your letter cited above on the subject, the site inspection was carried out on 10.7.2018 by Shri M.Pratap Reddy, AMG accompanied by Asok Konda, Nominated owner and Dr.B.S. Ganga Rao Qualified Person. The Review of 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: asokkonda@sarawagi.com and Qualified person's mail id bsgangarao@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 submitted while forwarding modified document.

Yours faithfully,

Encl:a/a

(Shailendra Kumar) Regional Controller of Mines

Copy: Dr.B.S.Ganga Rao, QP, L-1 Mehar Apartment, VIP Road, CBM Compound, Vishakapatnam-530003,AP...

(Shailendra Kumar) Regional Controller of Mines

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

(Shailendra Kumar) Regional Controller of Mines Scrutiny comments on examination of Review of Mining Plan in respect of Chinnaravyam Manganese mine of M/s S.K.Sarawagi & Co.(P) Ltd over an extent of 4.055 Ha situated in Sy.nos 5, 6,7, 9 &10(2) of Chinnaravyam Village, Merakamudidam Mandal, Vizianagaram Dist. of Andhra Pradesh State submitted under Rule 17(2) of MCR, 2016.

General:

- Besides other details on the cover page, the effective period of the Mining proposals be mentioned in parenthesis along with the block period. The breakup of land type also be given on the cover page. Complete address of the lessee and Qualified person including contact nos and E-mail id be furnished.
- 2. The legal /court issues, orders issued thereof and the present status of the same be discussed with the documentary evidence in the introductory chapter.
- 3. The authorization of the Owner for the preparation of the document by the qualified person has not been given standard format.
- 4. The Lease sketch enclosed is Xerox copy wherein the Geo Co ordinates of the boundary pillars have been superimposed. On the northern side a road is passing through beside the dump. Pl. clarify whether this Public road or not. A fresh lease sketch with authenticated Geo coordinates by the competent state authority be furnished. All the Plans and sections be prepared in confirmation with the authenticated lease sketch issued by the competent authority.
- 5. The Sy.nos as mentioned in the proceeding no. 4031/M1/2004 dated 24.3.2007 be furnished in all the Certificates.
- 6. None of the Form-K have been signed by the Geologist for its correctness. Few of lithologs (CHNV-2018-19 19) as furnished in the document does not confirm to actual core that has been preserved in the Core Boxes. All the lithologs be checked once for the correctness.
- 7. Para 2.0 a) (Lease details): The deemed extension period be deleted since the process for the same has not been intiated.
- 8. Para 2.0 b) (details of lease area/ Lease area with location Map): Sy.no wise extent be furnished. The Ownership occupancy be properly referred (either Govt waste land or Private land or reserve forest etc.).
- 9. Para 3.1(Date and reference earlier approved MP/SOM)-Details of approved MP/SOM): The approved Mining Plan validity period be given.
- 10. Para 3.3(Review of earlier approved proposals----): The item wise/year wise columns be properly be properly formatted. The year wise excess/less production be justified.
- 11. Para 3.4(Status of compliance of the Violations-----): The copies of Violation/Showcause letters and their replies have not been enclosed. violations and compliance thereof during the review period be furnished in Tabular form.
- 12. Para 3.5(Indicate and give details of any suspension---): The copy of suspension letter has not been annexed. Court orders received on the earlier occasions have also not been discissed and copy of the same is not enclosed.

PART-A

- 13. Para 1.0 a (Briefly describe the topography-----): The relief within the lease area has not been discussed..
- 14. Para 1.0 b (Regional Geology-----): The formations occurring in the area has not been properly equated with the Regional Geological setup.
- 15. Para 1.0 c (Local Geology): The dip direction has not been properly indicated. The dip should be either SW or NE.
- 16. Para 1.0 d Name of prospecting/exploration agency: The Technical person name under whom, the exploration has been carried out be given.
- 17. Para 1.0 e) ii) (No. of Boreholes-----): The nomenclature of the Borehole nos. furnished in the Text does not confirm to the Borehole nos furnished in the Form-K. It is very difficult to correlate the data with that of the Boreholes nos. mentioned in the cross sections which forms the basis of reserve estimate. Further all the lithologs mentioned in the form-K be checked once with respective core in the Core boxes and the Cross sections be re drawn with the factual mineralized intercepts. The uniformity of the nomenclature be maintained.
- 18. Para 1 e) iii) (Details of sample analysis----): The surface sample locations have not been marked in Geological Plan. The Variation in grade of the in house samples with that of NABL has not been discussed.
- 19. 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. Further there is still left out mineralsed area on the northern side around boreholes CBH-19 and 20 which show symptoms of mineralization. Accordingly, oriented/need based exploration be proposed in the mineral bearing area. In case of inclined boreholes, the direction of inclination (Azimuth) be indicated. Existing dump/Proposed dump be reviewed in view of minerlisation in CBH-19.
- 20. Para 1.0 J) (Reserves and Resources----): This para has not been dealt asper the guide lines. The Reserve of earlier Mining plan furnished is uncalled for. However it is desired that exhaust of the reserve arrived in earlier approved Mining Plan due to lack of proper delineation of the ore body and exploration data. The type of the deposit be properly classified/identified as per the norms of Mineral (Evidence of Mineral contents) Rules 2015. 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. The depth of the mineralistation be established based on the intercept of the Manganese ore. The reserve estimate be reviewed as per the comment vide para 1.0 e), The mineralisation is said to be upto 60 mRL, 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 and therefore the bottom line/limit is not a straight line. The core drilling and borehole density etc should be dealt under 'Technological' sub head of Geological axis. The colour photograph of a thin section be appended. Proper geostatistical analysis with regard to Chemical analysis and intercept of the Boreholes be done.

- Sintering has been often mentioned but at site no such process could be seen. In view of the water logged area between section B-B' and C-C', the reserve arrived in these sections be assigned with appropriate UNFC code of Economic and Feasibility axis as these axes do not fall under the code of '1'.
- 21. 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).
- 22. 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. The collapsed benches be addressed. The approved quantity of rate of ROM production by the EC be mentioned and legible copy of the same be appended. No mention of enhancement of production has been mentioned. The proposed production should be commensurate with the available reserve as per the comment vide para 1.0 K and life of the mine. The water logged portion between grid lines N-70& E80 toN92& E85 and N72 & E147 to N77 &E145. The production schedule be reviewed asper the comment vide para 1.0 J.
- 23. 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. All the proposals should exclude the water logged portion of the Pit. The nature of mineral reject and its percentage be spelled out. A provision of dump rehandling be made in view the proposed exploration around the Borehole CBH-19(2013-14). This para be reviewed as per the comment vide para no.1.0 j
- 24. 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. Separate year wise lay out plans and sections be drawn.
- 25. 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. The justification for the enhancement be reviewed asper comment vide para 1.0 j.
- 26. Para 2f(Conceptual Plan----): This para be reviewed as per the outcome of the para 1.0 k). It should be dealt upto the lease period.
- 27. Para 3.0 (Mine Drainage):) The authenticated document from the Ground water department regarding the depth of water table in and around the mining lease be enclosed. It has been stated that the ground water table is at a depth of 25-40m which needs to be corrected with that of the Ground water department Report.. The quantity of flow of water/hr and per day into the pit needs to be assessed for different season and the drainage proposals need to be submitted accordingly.
- 26. Para 4.0 9Stacking of Mineral reject/subgrade mineral-----:):It is stated that there is no generation of Top soil but in the Vth year generation of soil has been shown. It is not quite understood that the mineral rejects have been placed under the column beneficiation without proper explanation. The basis of 2% generation of sub grade mineral has not been spelled out.
- 27. Para 8.1.3 b) (Progressive Mine closure preparation- Qualified person): The RQP no. and validity period is uncalled for.

28. Para 8.6(Financial Assurance): In view of the above comments, the F.A. should be reassessed and a fresh BG be submitted as per Rule 27 of MCDR,2017along with final copies. The old BG shall be returned on receipt of the fresh BG.

The photographs have not been labeled. The extent of water loged pit photo be enclosed.

Annexures:

Annexures have not been properly numbered and indexed (Annexure-XII?) NABL Certificate of the Lab be enclosed.

PLATES

The Plate nos are not in accordance with index/content page.

- 1. Plate-1 (Key plan):. The Plan is illegible. 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. Plate-II(Lease Sketch): The Lease sketch enclosed is Xerox copy wherein the Geo Co ordinates of the boundary pillars have been superimposed. On the northern side, a road is passing through besides the dump. Pl. clarify whether this Public road or not. A fresh lease sketch with authenticated Geo coordinates by the competent state authority be furnished. All the Plans and sections be prepared in confirmation with the authenticated lease sketch issued by the competent authority.
- 3. :Plate-II A (Surface plan): Boundary Pillars have not been connected Ground Control Points(GCP). The Borehole locations have not been marked. Irrelevent index item be removed.
- 4. Plate-III (Geological plan): The Boreholes have not been distinctly marked and indexed. Strike and dip has not been marked. The Geological sections be drawn perpendicular to the strike of the formation and along the dip direction.
- 5. Plate-III A (Geological Sections): The Sections be redrawn as indicated above and the water logged mineralized part be distinctly marked and assess the reserve as per 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 depth of the estimate be restricted up to the bottom intercept of the hole in the manganese horizon. The scale of the exploration be marked.
- 6. Plate-IV (Development & Production Plan); The separate Yearwise lay out plan for the four years be prepared. No production proposal be envisaged in the water logged area.
- 7. Plate-VIII (Environment Plan): 60m line has not been drawn..Contours have not been extened up to 60m buffer zone. A small tank and a power line in the western part of the buffer zone has not been marked.
