

Scrutiny Comments on Review of Mining Plan document submitted by M/s Benita Industries Limited for Chabali Iron ore & Laterite Mine in Kadapa District over an extent of 163.482 ha

1. The index page containing contents, list of annexures, plates are missing.
2. Text part to be formatted properly as per the guidelines in vogue.
3. In the document it was mentioned that Sri A Ramakrishnaiah was also as one of the qualified person in addition to Sri P V Narayan Rao. Accordingly certificate to be signed by both qualified persons.
4. On page No.1, it was mentioned in the title that the document is submitted under Rule 12(3) & 23 of MCDR,2017, it is not correct. This should be corrected.
5. It was observed that there is significant enhancement of production proposals in the present document to that of earlier approved document. The document should be submitted under rule 17(3) of MCR,2016.
6. The reasons justifying the enhancement in the production proposals to be given along with a commitment that the lessee company shall approach MOEF for obtaining Environmental Clearance for enhanced proposals.
7. All the tables given in the text to be given serial number.
8. In para 3.1, mentioned to be made about all the approvals obtained since beginning of the mine.
9. In para 3.2, reasons for modification to be given as mentioned above.
10. In page No.6, under Review of production and development, actual production figures mentioned are not matching with those submitted in the annual returns to this office. Reconcile and correct the figures accordingly.
11. Review of the reserves position as on 01.02.2019 to be mentioned in comparison to the earlier approved document in 2014.
12. On page no.6 under afforestation, the proposed saplings for afforestation are not as per the figures given in the earlier approved document. Correct and modify accordingly.
13. In the table pertaining to Reclamation & Rehabilitation, mention to be made of the area reclaimed and rehabilitated till date.
14. Under para 3.4, it was mentioned that there are no violations issued which is not correct. The year wise violations issued and their compliance position to be included as annexures.
15. In para no.12, it was mentioned that there are four active pits, however, during the inspection it was observed that there are two active pits i.e. pit 4 & 9. Two new pits were proposed to be opened during the ensuing plan period. Accordingly changes to be made in the document.

16. It was also observed during the inspection that the pit no.10 is named as Amoda pit and being used as tailing pond for collecting slimes discharged from plant. Accordingly these to be marked as tailing pond in all plates and relevant places in text.
17. In page 19, under proposed exploration 55 DTH holes are proposed to be carried out. However, to delineate the ore body and for obtaining better configuration, few Core boreholes to be included in the proposal. Accordingly exploration programme to be reviewed.
18. On page no. 20, area under G1 & G2 category to be stated clearly by mentioning the extent covered under respective areas and area remaining to be explored under G3 & G4.
19. The reserves augmented consequent to exploration programme carried out need to be mentioned specifically. It was mentioned that after carrying out exploration there was augmentation of reserves, this should be justified by furnishing the parameters involved in augmentation of reserves/resources.
20. Classify status of exploration based upon the parameters furnished under the specified table for Geological Axis i.e. G1, G2, G3, G4 etc. and also mark it on relevant plan & sections. Following table to be included:

Level of exploration	Area(ha)	Reserves/Resources(Million tones)	Quality/grade of Iron ore
G1-Detailed Exploration			
G2-General Exploration			
G3-Prospecting			

21. A proper feasibility report having useful information on social ecological aspects, various clearances & permissions, statutory obligations, market sensitivity, cost variation, historical sale value data, cost analysis with cash flow, cost of production, sale value etc to assess economic viability is to be furnished.
22. Based on the information contained in Feasibility study, furnish the cost benefit analysis for Economic Viability i.e. E1, E2 or E3.
23. On page no. 29 it was mentioned that 23 core boreholes have been carried out. However only 13 core bore holes have been carried out. This needs to be corrected.
24. On page no.36, the ore and OB ratio was mentioned as 1:0.93 this does not match with the field observation. This needs to be corrected.

25. The five year proposal under mining chapter to be discussed in detail in year-wise manner with area to be degraded with bench parameters and the direction of the development in the active pits and also in the proposed two new pits. All the works be defined with proper area co-ordinates and sections by referring the plate numbers and annexures for detailed calculations.
26. Adequacy of the machinery is not justified, mere mentioning of number of machinery used is not proper. Discuss in detail the adequacy of each machinery, capacity & type for loader, dozer, DTH drill etc.
27. The powder factor(tones of rock/Kg of explosive) is mentioned as 1.67 Cu.M which is not correct. This should be rectified.
28. The proposed production figures given at tables in page no.36 are not matching with the figures given at page no.41 for years 2019-20 & 2023-24. This needs to be reconciled.
29. The disposal of waste generated, location of dumping, configuration of waste dump, protective measures taken to be discussed in detail.
30. Under para 8.2 on page no.52, discuss about the noise levels(Max & Min) at all strategic locations like loading/unloading/plant/office etc.
31. Under para socio-economic, discuss about the main occupation of the local villagers and how many locals are being employed/benefitted by the mining activity.
32. In the para 8.3.5, details of proposed action under different heads such as dump management, Reclamation & Rehabilitation etc to be discussed for the ensuing five years block period, year-wise. A review has been made which is not correct.
33. The proposals to be submitted as per table given in the annexure.
34. Environment baseline information in para 8.1 & Impact of Assessment is sketchy and more detailing is required in various sub heads such as Air Quality, Water Quality, Noise Quality etc in both core and buffer zones.
35. Proposal for quarterly monitoring of the environmental parameters such as Air/Water/Noise quality to be incorporated in the document at relevant places.
36. In the financial Assurance table there are certain omissions which are given below, accordingly financial assurance needs to be reviewed and submitted along with final copies.
 - (a) Area mentioned under additional requirement is 7.4 ha instead of 5.885 ha
 - (b) Area under infrastructure is around 5.23 ha instead of 0.177 ha.

Annexure:

37. Copies of violation letters and compliance copies to be enclosed.
38. Address proof of the Managing Director and other board members to be enclosed along with photo ID.

39. Feasibility report is totally missing. This needs to be enclosed as annexure prepared as per the prescribed format.
40. Analysis of all core boreholes to be enclosed.

Plates:

41. In plate No.1: Predominant wind direction to be marked.
42. Plate No.2: Lease sketch to be authenticated along with Geocoordinates by ADMG, State Government has not been furnished.
43. Mineral stacks are lying all over the lease. These stacks need to be quantified and mentioned in the text at relevant places.
44. Plate No.3: There exists a public road on the western part of the lease. This should be marked distinctly with different color.
45. During the inspection it was noticed that ROM stocks are lying in the 7.5 barrier zone on the southern side. This needs to be modified suitably.
46. Safety barrier for power lines to be marked.
47. Lease boundary and other features to be marked as per standard color codes and symbols as per MMR 1961.
48. In the Geological plan Exploration limits such as G1, G2, G3 and G4 to be marked. Structural details like strike and dip to be marked.
49. In plate No.5A(Geological Sections)
- (a) In Section B-B' pit no.11 to be marked.
 - (b) Public road with buffer zone to be marked in all sections.
 - (c) In section D-D', pit no.14 and ROM stock to be marked.
50. In plate No.5 B:
- (a) ROM stock to be mentioned at section K-K'.
 - (b) There are some areas falling under G3 & G4 category in sections L-L', M-M', O-O'. These should be marked.
51. Reclamation plan and conceptual plan should be prepared separately and enclosed.
52. In reclamation plan, area proposed to be back filled in the ensuing five year block period to be marked year-wise with different colors.
53. In plate no. 10, various monitoring stations for Air/Noise/Water quality need to be marked at all strategic locations such as loading/unloading, plant/office/crusher etc. Further, all the features should be properly indexed.
54. In plate no.9 i.e. financial assurance plan has not been updated as per the surface plan. This needs to be updated and changes in area put to use to be modified.
55. The conventions provided under the Metalliferous Mines Regulations, 1961, shall be used in preparing all plans and sections.



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



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Room No.603, 6th Floor,
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Date. 28.02.2019.

Shri D.Venugopal,
M/s Benita Industries Limited,
D.No.203,Aditya Elite,
B S Makhta,Somajiguda,
Hyderabad-82.

Sub: Submission of Review of Mining in respect of Chabali Laterite, Ferruginous shale & Iron ore Mine of M/S. Benita Industries Limited over an extent of 163.432 Hc. in Chabali Village, Pendlimarri Mandal,, Kadapa district, Andhra Pradesh submitted under Rule 17(2) of MCR, 2016.

Ref: Your letter no. nil dated. 14.02.2019.
Sir,

With reference to your letter cited above on the subject, inspection of the mine was carried out on 23.2.2019 by Shri A.V.Ramesh Kumar, AMG, accompanied with Shri A.Ramakrishnaiah, Q.P and Shri Mahesh, Manager (mines) 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., benitaindustries@yahoo.com , podurirao@gmail.com and ramakrishnaiah.alam@gmail.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,

Enc: As above.

(Shailendra Kumar)
Regional Controller of Mines

Copy to Sri P.V.Narayana Rao and Sri A.Ramakrishnaiah, Qualified Persons.

(Shailendra Kumar)
Regional Controller of Mines

मूल पति पर नहींकः
खान नियंत्रक (द), भारतीय खान ब्यूरो, बेंगलुरु।

(शैलेन्द्र कुमार)
क्षेत्रीय खान नियंत्रक