

The Goa Foundation

G-8, St Britto's Apartments
Feira Alta, Mapusa 403507 Goa
Email: goafoundation@gmail.com
www.goafoundation.org

17 June, 2015

The Chief Vigilance Officer,
Directorate of Vigilance,
Serra Building
Near All India Radio, Altinho - Panaji
GOA - 403 001.

Re: Complaint under Section 13(1)(d) of the PC Act, 1988, against Mr Laxmikant Parsekar (also, Minister for Mines); Mr P.K. Sains, (also former Secretary, Mines, Goa Govt); and Mr Prasanna Acharya, (also Director of Mines & Geology, Panaji, Goa).

Dear Sir,

The following complaint is filed against the above named persons for offences committed by them under Section 13(1)(d) of the Prevention of Corruption Act, 1988 in the act of renewing 88 mining leases for mining in Goa with a total annual production capacity of 44 million tonnes.

The complaint charges that the above persons entered into a conspiracy to renew 88 mining leases to several persons in Goa. These renewals were carried out for extraneous considerations and appear to be corrupt acts, as will be the focus of the case made out below in this complaint.

The renewals resulted in colossal losses to the public exchequer and were therefore completely against public interest. They were carried out in wilful violation of the provisions laid down in the MMDR Act, Mineral Concession Rules, 1960 and Supreme Court's orders. The actions attract Section 13(1)(d) of the PC Act.

Background of the complainant:

The Goa Foundation is a registered NGO based in the State of Goa, India. All its members are citizens residing in Goa. All are in principle owners of the minerals in the State and by law have equitable access to the same and of the compensation thereof, directly or indirectly. State is a trustee of these resources on behalf of its citizens.

The Goa Foundation was the petitioner in Writ Petition (Civil) 435 of 2012 filed by it in the Supreme Court of India relating to illegal mining in the State. The judgment on the petition was delivered on 21-Apr-2014. Copy of the judgement is **Exhibit 1** (CD annexed).

The said judgment required the State of Goa to grant mining leases in the State of Goa in conformity with the provisions of the MMDR Act, 1957 and constitutional provisions.

Critically, the said judgement ruled that all iron ore mining leases in Goa had expired on 22-Nov-2007, and that any mining and sale of mineral ore from that date till the date on which all mining activity was suspended by order of the Goa Government on 10.9.2012 was illegal (i.e., a period of 5 years from 22.11.2007 to 10.9.2012).

As a consequence of the SC decision, there were two options available to the Goa Government (represented by the above-mentioned three persons) for renewal or reopening of the said leases:

- a) Renew the leases under section 8 (3) of the MMDR Act, 1957 with the same lease-holders.

Any renewal of a mining lease under Section 8 (3) would be in the form of a finding that the renewal was in the interests of mineral development in each instance.

Renewals under 8 (3) could not be carried out without a report from the IBM under the proviso to Rule 24 (3) of the Mineral Concession

Rules,1960. IBM is the competent authority to advise the Government on lease renewal as it has the expertise and data on reserves – information not readily available to the State.

Or,

- b) Submit the leases to public auction for procuring maximum revenues for the State and the rightful owners, the people of the State.

Bombay High Court judgement dated 13.8.2014

Immediately after the above Supreme Court judgement of 21.4.2014, some of the former lease holders (28 parties) moved the Bombay High Court at Panaji to direct the State Government to renew their mining leases, as they had paid the relevant stamp duty for the mining lease deeds. Judgement on a batch of writ petitions was delivered by the High Court on 13 August, 2014. The Hon'ble High Court issued two directions in the said judgement:

“In the above facts and circumstances, we dispose of the writ petitions by passing the following order:

“(I) The Respondent – State of Goa is directed to execute the lease deeds under Section 8(3) of the MMDR Act in favour of the petitioners/lease holders who/which have already paid the stamp duty pursuant to the orders of the Government, in accordance with the Goa Mineral Policy, 2013 placed before the Supreme Court in Writ Petition (Civil) No.435/2012 and subject to the conditions laid down by the Apex Court in the said Writ Petition.

“(II) So far as the petitioners/lease holders who/which have not paid the stamp duty are concerned, the Respondent – State of Goa is directed to decide their renewal applications under Section 8(3), as expeditiously as possible, and preferably within a period of three months from the date of receipt of copy of this order.”

I am annexing copy of the Bombay High Court judgement dated 13.8.2014 as **Exhibit 2** (CD annexed).

I am also herewith informing the Vigilance Department that the Goa Foundation has already filed an SLP challenging the Bombay High Court order dated 13.8.2014 which is pending adjudication before the Supreme Court of India.

MMDR 1957 Amendments

In November 2014 or thereabouts, the Union of India decided for various reasons (including judicial pronouncements) to amend the MMDR Act, 1957. The complainant, together with a few others, was called by the Ministry of Mines for a hearing on these amendments in December 2014.

Thereafter, as per copy of the press reports annexed as **Exhibit 3** to this complaint, the Cabinet took a decision to notify the amendments to the MMDR Act – which would enable only auctioning of mineral ore leases in future – to be issued in the form of an Ordinance.

It appears that after the Cabinet meeting had been held, another meeting was called at the instance of the mining lobby from Goa and elsewhere, during which further amendments were made to protect the interests of the said lobby. These specific provisions allowed mining leases “already renewed” to operate for a fresh period of 20 years.

In view of these changes, large-scale attempt was made by the three persons against whom this complaint is made, together with the mining lobby, to renew leases as speedily as possible before the Ordinance came into effect. In fact, there appears to have been an unholy scramble to grant renewals *en masse*. The three persons named in this complaint facilitated and approved the renewals, disregarding all laws, regulations and requirements of the order of the Supreme Court in its judgement dated 21.4.2014.

I am setting out the relevant details concerning the 28 writ petitioners who appeared before the High Court and the date of the renewal/non-renewal of their leases by the State Government in **Table A** annexed to this complaint.

I am listing in **Table B** (annexed to this complaint), the dates on which other mining leases were renewed *en masse* in the State of Goa. Suffice it to say that in the period of just one week, as **Table B** shows, a total of 56 mining leases were renewed. This was obviously on the basis of prior information being available to the State Government about impending change in law.

The State of Goa, represented by the three persons named in this complaint, renewed these 88 mining leases thus in extremely suspicious circumstances and, as will be shown below, caused colossal losses to the public exchequer.

Loss to Public Exchequer Quantified:

We have attempted to quantify the loss to the public exchequer from renewal of 88 mining leases, using an eight year historical weighted average (2004-2012), as follows:

1	Total quantity permitted for extraction as per ECs granted in 88 leases:	43.973 million metric tonnes (MMT), for at least 12 years (Nov-Jan 2014 – 21-Nov-2027)
2	Value of mineral ore @ Rs. 311.12 crores per MMT	Rs. 164,172 crores
3	Extraction costs for 43.973 million tonnes @ Rs. 120.25 crores per MMT	Rs. 63,453 crores
4	Net value of iron ore @ Rs. 190.87 crores per MMT	Rs. 100,720 crores
5	Royalty @ Rs. 8.46 crores per MMT to Goa Govt	Rs. 4,467 crores
6	Goa Iron Ore Permanent Fund @ 10% of sale value, Rs. 31.11 crores per MMT	Rs. 16,417 crores
7	Net loss to the public of Goa: Rs. 151 crores per MMT	Rs. 79,836 crores

If we assume the total quantity permitted for extraction capped at 20 million tons, for at least 12 years (22-Nov-2015 – 21-Nov-2027), as required by the judgement dated 21.4.2014, following would be the scenario:

1	Total quantity permitted for extraction as per ECs granted in 88 leases:	20 million metric tonnes (MMT), for at least 12 years (Nov-Jan, 2014 – 21-Nov-2027)
2	Value of mineral ore @ Rs. 311.12 crores per MMT	Rs. 74,669 crores
3	Extraction costs for 20 million tonnes @ Rs. 120.25 crores per MMT	Rs. 28,860 crores
4	Net value of iron ore @ Rs. 190.87 crores per MMT	Rs. 45,810 crores
5	Royalty @ Rs. 8.46 crores per MMT to Goa Govt	Rs. 2,032 crores
6	Goa Iron Ore Permanent Fund @ 10% of sale value, Rs. 31.11 crores per MMT	7,467 crores
7	Net loss to the public of Goa: Rs. 151.30 crores per MMT	Rs. 36,311 crores

It may be recalled that the Supreme Court set aside by a detailed judgement coal block allocations made by the Central Government fairly recently. Pursuant to the judgement, some coal blocks have now been auctioned for a sum exceeding Rs.3.5 lakh crores. Similarly, auction from the sale of spectrum has netted the government more than Rs.1 lakh crore.

In the case of Karnataka iron ore mines, the category C mines which were cancelled by the Supreme Court of India in its judgement in the Bellary mining case are proposed to be auctioned at a floor of 35% of the IBM stipulated price.

In contrast, the 88 mining leases have been renewed at zero cost of the value of the ore to various persons and companies, thus wholly disregarding directions of the Supreme Court of India that the disposal of natural

resources should be under a regime that “maximises revenues” to the State and the real owners of the ore, the citizens of Goa.

Illegality resorted to in the processing of granting the renewals

A large number of leases got signed on January 6 and January 12, 2015. The two days show extraordinary productivity in the Mines Department in giving away public assets to private interests through renewals of leases, especially when the cabinet approved ordinance would have immensely benefited the public by mandating auctions. Following specific methods were resorted to by the persons against whom this complaint is made:

a) 8 (3) renewal orders on different footing from 8 (2) renewal orders

Though the Supreme Court judgement clearly stated that the orders for renewal under 8 (3) must be reasoned orders, in all the 56 cases, the same order was simply duplicated and copied, with some minor changes in each case, in order to facilitate speedy renewals. I am enclosing copies of the 88 second renewal orders as **Exhibit 4 colly** (CD annexed). Each order discloses several inconsistencies. Data analysis of these 88 lease renewal documents is at **Table C** annexed to this complaint.

b) No IBM concurrence

The MCR Rules, 1960, need an expert opinion on the need to renew the lease under Section 24 (3) from the IBM. It is only after a period of 3 months from the date of an application from the Mines Department – and if the IBM does not reply – that the Department may assume consent or concurrence with the renewal proposal. However, for arriving at an opinion for second renewal, reference to Section 24(3) from the IBM would be mandatory, as the State Government presently does not have the necessary competence in the matter. The Department of Mines & Geology, in fact, does not have even a trained geologist!

However, as it is obvious in the cases listed in **Table C** (annexed with this complaint) letters were written to the IBM in the week immediately preceding the renewal in the cases of TCs 14/58, 86/53, 41/55, 4/55, 29/55, 14/52, 45/54, 6/49, 10/51, 3/57, 24/57, 48/58. Before these letters could have reached the IBM inward registers, the persons named in the complaint had already accommodated the lease holders concerned and approved their leases.

It can also be seen from the same table that in most cases the Department has not bothered to even wait for the response from the IBM but has proceeded with renewals under deemed approval of IBM. In some cases, where there has been a contrary opinion or a cautionary opinion, this has been simply ignored. In the case of Geetabhai Parulekar, for example, a very influential party, a negative opinion has been received from the IBM. However, this has been circumvented by writing for a fresh opinion and then claiming 3 months deemed approval from IBM. In the case of one of the Codli mines belonging to Sesa Sterlite, the lease has been approved despite the fact that the IBM has warned the State Government that even the first renewal of the lease has not been approved.

c) Leases renewed on 12.1.2015 when no such provision for renewal exists

The haste to approve the grant of renewal was so unseemly that 31 mining leases were renewed on 12.1.2015, when the specific provision which allow renewals (Section 8(3)) was no longer available on the statute book of the country. Therefore, the decision to renew in all 31 cases is clearly illegal. Their bunching on this date raises many suspicions. (We should comment that a similar situation has arisen in Karnataka where 12 leases have been renewed on January 12 itself. There, the BJP¹ (which is in the opposition) has been found protesting the acts of the Congress government! The renewal of all these 31 cases therefore needs to be placed on a separate footing altogether and thoroughly investigated.

¹ <http://www.thehindu.com/news/national/karnataka/cm-received-kickbacks-in-renewal-of-mining-licenses-bjp/article6928822.ece>

d) Renewal in absence of a Mining Lease Renewal Policy

As per the SC order, the leases were to be renewed or granted in line with a notified policy. A draft policy was placed on the website of the Department of Mines & Geology on 1-Oct-2014, well before any lease was renewed. This policy clearly stated that it was subject to vetting for "*exact legal requirements from specific necessities as also from financial view points.*" This document further goes on to state that after such vetting is completed, the policy will be notified thereafter.

As per all legal norms, a policy comes into force when it is gazetted. A final Goa Grant of Mining Leases Policy, 2014² was notified in the Government Gazette only on 20-Jan-2015. *Interestingly, this is after the 88 leases had already been renewed.* The MMDR Amendment Ordinance, 2015 notified on 12-Jan-2015, however, eliminated the possibility of granting renewals of leases without auction. Consequently, the policy was infructuous on the day it was issued. Thus it is clear that the leases were renewed without a policy in force, in wilful disregard of the judgement of the Supreme Court.

e) Leases renewed despite on-going investigations into illegalities

Many of the leases renewed had a number of violations reported during their past activity of mining. There have been a number of other reports with adverse findings. These include the Public Accounts Committee Report, the Shah Commission Reports 1-3, the Central Empowered Committee Report as well as the Expert Appraisal Committee Report (MOEF Committee chaired by Vishwanath Anand). Copies of these reports can be supplied to the CAG on request.

A number of parallel civil and criminal investigations are underway that have implications for the mining leases. For example, the Shah Commission Report 3 deals with under-invoicing of exports of iron ore. Sesa Sterlite has been named multiple times in this report. The Enforcement Directorate has initiated an investigation into the findings of this report. Despite this cloud of widespread illegal practices and on-going serious investigations, the

² 1415—52-SI-EOG-2

mining leases have been renewed. Under any normal circumstances, such entities would not be considered appropriate entities to issue leases to – they fail “the fit and proper person test”. Just like a contractor whose bridges fail due to poor construction would not be selected to build another bridge – he is not a fit and proper for further contracts for building bridges.

The Supreme Court on Maximum Revenues from Natural Resources

In its judgement dated 21.4.2014, the Supreme Court directed the state of Goa to grant mining leases in accordance with its policy decision, the law (the MMDR Act) and in accordance with constitutional provisions. Constitutional provisions require the State of Goa to maximise what it receives for natural resources, unless there is an overriding social or welfare purpose. This would usually require an auction. In fact, the landmark 2G Presidential Reference judgment of the Supreme Court of India observes:

*“Alienation of natural resources is a policy decision, and the means adopted for the same are thus, executive prerogatives. **However, when such a policy decision is not backed by a social or welfare purpose, and precious and scarce natural resources are alienated for commercial pursuits of profit maximising private entrepreneurs, adoption of means other than those that are competitive and maximise revenue may be arbitrary and face the wrath of Article 14 of the Constitution.** Hence, rather than prescribing or proscribing a method, we believe, a judicial scrutiny of methods of disposal of natural resources should depend on the facts and circumstances of each case, in consonance with the principles which we have culled out above. Failing which, the Court, in exercise of power of judicial review, shall term the executive action as arbitrary, unfair, unreasonable and capricious due to its antimony with Article 14 of the Constitution”* (emphasis ours)

The Goa Foundation has written to the Chief Minister on 15-May-2014 sharing the analysis, and recommending a way forward to maximising revenues, and dealing with the interim dislocation. We have also written on 29-May-2014 pointing out the implications of the Supreme Court judgment in the 2G Presidential Reference case. Our Press Note dated 12-Dec-2014 also lays out the logic and a potential path for the Government to take. All

these documents are annexed as **Exhibit 5 colly** and are to be found in the CD annexed. The Goa government and the officials named in the complaint are well aware of the constitutional position enunciated by the Apex Court.

In addition to the above, we note the following:

1. Rs. 1083.63 crores has been paid / demanded as stamp duty for these leases. This was calculated as per the Stamp Act as 15% of the royalty over 20 years assuming extraction at the EC limits (43.973 MMT). This implies an anticipated total collection of royalty of Rs. 7,224 crores over 20 years, or Rs. 361.21 crores a year. However, the leases last for another 12 years. Therefore, the royalty estimated is Rs. 4,335 crores. Our estimate is Rs. 4,467 crores, which is very close.

The stamp duty charge has been levied by the Government of Goa for the purpose of the stamp duty payable under the Stamp Duty Act. Such a charge does not reflect the value of the ore handed over through the leases to private persons and does not fall under the category of maximizing of revenue.

2. We also note here that an amount conservatively estimated at Rs. 118,663 crores is recoverable on account of illegal mining after 22-Nov-2007. The Goa Foundation has written to the Goa government on 30-Apr-2014 and again on 11-Dec-2014 (**Exhibit 6 on CD**). In a similar situation in Odisha, the state government renewed the lease from the date of execution, rather than the prior date of expiry (**Exhibit 7 on CD**). However, this has not been done in the cases of renewal of the 88 leases in Goa. By renewing the leases without specifying a date from which the lease would take effect, the State of Goa is willing to create a situation by which it can deny its legitimate claim to Rs. 118,663 crores for itself and the welfare of the people – this is more than Rs. 8 lakhs per person (population of 15 lakhs).

Therefore, the total loss to the people of the State is conservatively Rs.1,50,000 crores, and may easily cross Rs. 2,00,000 crores.

We request you to investigate this complaint. The Goa Foundation will be glad to assist with the inquiry, if called upon to do so.

Sincerely,

Dr Claude Alvares
Director

Encl:

1) Tables A-C

**Table A - Mining Leases renewed pursuant to High Court Order dt 13 -8-2014
and on payment of Stamp Duty**

SR NO	Lease No	Name of the Lease Holder	Date of Second Renewal Order
1	045/52	SOC.TIMBLO IRMAOS (S.F.I.)	05-11-2014
2	088/52	SOC.TIMBLO IRMAOS (S.F.I.)	05-11-2014
3	089/52	LITHOFERRO	05-11-2014
4	008/41	G.N.AGRAWAL	05-11-2014
5	055/51	GEETABALA M.PARULEKAR	05-11-2014
6	029/54	V.M.SALGAOCAR & BRO.	06-11-2014
7	083/52	V.M.SALGAOCAR & BRO.	06-11-2014
8	050/53	V.M.SALGAOCAR & BRO.	06-11-2014
9	013/55	V.M.SALGAOCAR & BRO.	06-11-2014
10	051/52	KUNDA GHARSE	06-11-2014
11	098/52	CHOWGULE & CO.LTD	07-11-2014
12	006/55	SOC.TIMBLO IRMAOS (P.T.I.) [SESA GOA]	07-11-2014
13	004/49	RAJARAM BANDEKAR (SIRGAD MINES)	07-11-2014
14	126/53	SESA GOA LTD	10-12-2014
15	070/52	SESA GOA LTD	10-12-2014
16	061/53	SOC.TIMBLO IRMAOS (P.T.I.)	10-12-2014
17	005/49	CHOWGULE & CO.LTD	24-12-2014
18	013/49	CHOWGULE & CO.LTD	24-12-2014
19	041/56	CHOWGULE & CO.LTD	24-12-2014
20	008/61	MADACHEM BHAT LTD.	05-01-2015
21	084/52	BANDEKAR BROS. PVT. LTD	05-01-2015
22	011/41	DEMPD MINING CORP.LTD.	12-01-2015
23	013/41	DEMPD MINING CORP.LTD.	12-01-2015
24	012/41	DEMPD MINING CORP.LTD.	12-01-2015
25	014/41	DEMPD MINING CORP.LTD.	12-01-2015
26	015/41	DEMPD MINING CORP.LTD.	12-01-2015
27	110/53	COSME COSTA & SONS	12-01-2015
28 *	063/51	CHANDRAKANT F. NAIK (LATE) / RAJESH TIMBLO	14-12-2009

Note * If this lease is included the list of renewed leases is 89. Total 88 leases renewed between 5-11-2014 & 12-01-2015

Table B - Lease Renewals unconnected with High Court Order dt 13-8-2014. *

SR NO	Lease No	Name of the Lease Holder	Date of Second Renewal Order	Stamp Duty paid to Goa Govt as per LAQ dt 26 Mar 2015
1	012/57	CHOWGULE & CO.LTD	24-12-2014	19698907
2	038/51	CHOWGULE & CO.LTD	24-12-2014	44499904
3	022/50	CHOWGULE & CO.LTD	24-12-2014	61801189
4	031/53	CHOWGULE & CO.LTD	24-12-2014	239312990
5	069/51	SESA GOA LTD	24-12-2014	590880000
6	016/51	V.D.CHOWGULE (LATE)	24-12-2014	146620592
7	040/50	V.D.CHOWGULE (LATE)	24-12-2014	153379408
8	040/51	N.S.NARVEKAR (LATE)	01-01-2015	127700000
9	012/52	N.S.NARVEKAR (LATE)	01-01-2015	97300000
10	014/53	SOC.TIMBLO IRMAOS (S.F.I.)	01-01-2015	150000000
11	062B/52	V.M.SALGAOCAR & BRO.	02-01-2015	93260350
12	019/58	V.M.SALGAOCAR & BRO.	02-01-2015	118236625
13	006/61	G.N.AGRAWAL	02-01-2015	150000000
14	023/53	EMCO GOA LTD	06-01-2015	
15	007/41	EMCO GOA LTD	06-01-2015	
16	095/52	DAMODAR MANGALJI & CO.	06-01-2015	
17	033/53	M/S DAMODAR MANGALJI	06-01-2015	
18	001/55	DAMODAR MANGALJI & CO.	06-01-2015	
19	028/51	SESA GOA LTD	06-01-2015	150000000
20	076/52	SESA GOA LTD	06-01-2015	60000000
21	009/49	SESA GOA LTD	06-01-2015	27282859
22	010/49	SESA GOA LTD	06-01-2015	23270881
23	003/54	SESA GOA LTD	06-01-2015	9446261
24	143/53	SOC.TIMBLO IRMAOS (P.T.I.)	06-01-2015	
25	087/53	SOC.TIMBLO IRMAOS (P.T.I.)	06-01-2015	
26	019/52	V.M.SALGAOCAR & BRO.	06-01-2015	65843110
27	044/56	V.M.SALGAOCAR & BRO.	06-01-2015	60970720
28	039/56	V.M.SALGAOCAR & BRO.	06-01-2015	
29	047/54	V.M.SALGAOCAR & BRO.	06-01-2015	69725370

30	002/51	M.S.TALAUlikAR & SONS	06-01-2015	
31	062A/52	SUNANDA D. BANDODKAR (LATE)	06-01-2015	150000000
32	016/55	V.G.QUENIM (LATE)	06-01-2015	131100000
33	034/50	SOC.TIMBLO IRMAOS (P.T.I.)	06-01-2015	
34	029/52	GURUDAS TIMBLO (PTI) / SRI PANDURANG TIMBLO (PTI)	06-01-2015	
35	018/53	DAMODAR MANGALJI & CO.	09-01-2015	
36	070/51	R.S.SHETYE & BROS	09-01-2015	
37	092/52	SOC.TIMBLO IRMAOS (T.P.L.)	12-01-2015	
38	014/58	SOC.TIMBLO IRMAOS (T.P.L.)	12-01-2015	
39	086/53	LATE V.M.SALGAOCAR (SALLITHO)	12-01-2015	
40	041/55	V.M.SALGAOCAR & BRO. (SMI)	12-01-2015	
41	003/51	V.S.DEMPO & CO.LTD.	12-01-2015	
42	040/54	V.S.DEMPO & CO.LTD.	12-01-2015	
43	035/52	V.S.DEMPO & CO.LTD.	12-01-2015	
44	020/54	V.S.DEMPO & CO.LTD.	12-01-2015	
45	021/54	V.S.DEMPO & CO.LTD.	12-01-2015	
46	005/54	V.S.DEMPO & CO.LTD.	12-01-2015	
47	004/55	MARZOOK & CADAR LTD.	12-01-2015	
48	041/54	AHILIABAI SARDESSAI	12-01-2015	
49	005/53	ALEIXO MANUEL DA COSTA	12-01-2015	
50	029/55	ATCHUTA V.S VELINGKAR	12-01-2015	
51	014/52	BADRUDDIN MAVANI	12-01-2015	
52	045/54	SOVA (BALKRISHNA AVDE)	12-01-2015	
53	006/49	HIRALAL KHODIDAS (LATE)	12-01-2015	
54	010/51	HAIDER KASSIM KHAN (L)	12-01-2015	
55	008/50	RAJARAM POIGUINKAR (LATE)	12-01-2015	
56	003/57	KUNDA GHARSE	12-01-2015	
57	033/57	KUNDA GHARSE	12-01-2015	
58	019/54	KUNDA GHARSE	12-01-2015	
59	024/57	RAMACANT VELINGKAR	12-01-2015	
60	059/51	ZOIRAM BHICAJI NEUGI (LATE)	12-01-2015	
61	048/58	CAXINATH TALAUlikAR	12-01-2015	

Note * Only 23 of the 51 Leases have paid Stamp Duty

Table C- Data relating to Second Renewal of 88 mining leases in Goa

Sr No	Lease No	NAME OF LEASE HOLDER as per 1987 Act	Whether EC restored	If lessees are parties in HC order of 13 Sept 2014	Date of Goa Govt. Letter to IBM for report under 24 A Sub Rule 3	Date of IBM Report under Rule 24 A Sub Rule 3 *	Dt of 2nd Renewal Order	Stamp Duty Demanded	Royalty Payment	Surface Rent	Dead Rent	Name of lease holder in 2nd Renewal Order
1	005/49	CHOWGULE & CIA LTD	Yes	Yes		30-01-2009	24-12-2014		11749204.00	22575.00		CHOWGULE & Co Pvt Ltd
2	013/49	CHOWGULE & CIA LTD	Yes	Yes		23-01-2009	24-12-2014		57285359.00	29055.00		CHOWGULE & Co Pvt Ltd
3	012/57	CHOWGULE & CIA LTD	Yes			27-07-2009	24-12-2014			6000.00	20000.00	CHOWGULE & Co Pvt Ltd
4	038/51	CHOWGULE & CIA LTD	Yes			30-01-2009	24-12-2014			13554.00	45180.00	CHOWGULE & Co Pvt Ltd
5	022/50	CHOWGULE & CIA LTD	Yes			17-07-2008	24-12-2014		77250012.00	18824.00		CHOWGULE & Co Pvt Ltd
6	098/52	CHOWGULE & CIA LTD	Yes	Yes		27-07-2009	07-11-2014		50375439.00	22383.00		CHOWGULE & Co Pvt Ltd
7	041/56	CHOWGULE & CIA LTD	Yes	Yes		10-12-2008	24-12-2014		51443332.00	20600.00		CHOWGULE & Co Pvt Ltd
8	031/53	CHOWGULE & CIA LTD	Yes			04-11-2008	24-12-2014		201521622.00	25192.00		CHOWGULE & Co Pvt Ltd
9	011/41	DEMPD & SOUZA LTD	Yes	Yes		04-11-2008	12-01-2015	Nil	Nil	Nil	Nil	Sesa Mining Corp Ltd.
10	013/41	DEMPD & SOUZA LTD	Yes	Yes		04-11-2008	12-01-2015	Nil	Nil	Nil	Nil	Sesa Mining Corp Ltd.
11	012/41	DEMPD & SOUZA LTD	Yes	Yes		04-11-2008	12-01-2015	Nil	Nil	Nil	Nil	Sesa Mining Corp. Ltd.
12	014/41	DEMPD & SOUZA LTD	Yes	Yes		04-11-2008	12-01-2015	Nil	Nil	Nil	Nil	Sesa Mining Corp. Ltd.
13	015/41	DEMPD & SOUZA LTD	Yes	Yes		04-11-2008	12-01-2015	Nil	Nil	Nil	Nil	Sesa Mining Corp. Ltd.

14	023/53	EMPRESA MINERO COMMERCIAL	Yes			24-02-2009	06-01-2015	84005752.00				EMCO Goa Pvt Ltd
15	007/41	EMPRESA MINERO COMMERCIAL	Yes			24-02-2009	06-01-2015	125994248.00				EMCO Goa Pvt Ltd
16	095/52	V S DEMPO & CIA LTD	Yes		06-07-2009 (Report not		06-01-2015	210000000.00				
17	018/53	DAMODAR MANGALJI & CIA LTD	Yes		Nil	Nil	09-01-2015	22500000.00				DAMODAR MANGALJI & Co LTD
18	033/53	DAMODAR MANGALJI & CIA LTD	Yes		09-03-2009 (Report not Received)		06-01-2015	30000000.00				DAMODAR MANGALJI & Co LTD
19	001/55	DAMODAR MANGALJI & CIA LTD	No		07-07-2009 (Report not received)		06-01-2015	30000000.00				DAMODAR MANGALJI & Co LTD
20	028/51	SESA GOA LTD	Yes			26-02-2009	06-01-2015		29361778.00	7188.00		Sesa Sterlite Ltd
21	076/52	SESA GOA LTD	No			07-05-2008	06-01-2015		10802733.00	29820.00		Sesa Sterlite Ltd
22	009/49	MINGOA PVT LTD	Yes			05-01-2009	06-01-2015			27762.00	92539.00	Sesa Sterlite Ltd
23	010/49	MINGOA PVT LTD	Yes			07-05-2008	06-01-2015			23679.00	33098634.00	Sesa Sterlite Ltd
24	003/54	MINGOA SOCIEDADE MINERIA GOESA,	Yes			05-11-2009	06-01-2015		1991058.00	9612.00		Sesa Sterlite Ltd
25	126/53	MINGOA SOCIEDADE MINERIA GOESA,	Yes	Yes		07-05-2008	10-12-2014		1456639303.00	30000.00		Sesa Sterlite Ltd
26	069/51	MINGOA SOCIEDADE MINERIA GOESA,	Yes			28-04-2008	24-12-2014			25285.00	84284.00	Sesa Sterlite Ltd
27	070/52	MINGOA SOCIEDADE MINERIA GOESA,	Yes	Yes		02-02-2009	10-12-2014		650152961.00	34580.00		Sesa Sterlite Ltd
28	006/55	SOCIEDADE TIMBLO IRMAOS LTD	Yes	Yes		23-02-2009	07-11-2014		107245649.00	8003.00		Sesa Sterlite Ltd
29	061/53	SOCIEDADE TIMBLO IRMAOS LTD	Yes	Yes		23-10-2007	10-12-2014		103869550.00	43325.00		SOCIEDADE TIMBLO IRMAOS LTD Rep Pandurano Timblo

30	143/53	SOCIEDADE TIMBLO IRMAOS LTD	Yes			02-02-2009	06-01-2015		96927132.00	29881.00		SOCIEDADE TIMBLO IRMAOS LTD Rep Pandurang Timblo
31	087/53	SOCIEDADE TIMBLO IRMAOS LTD	Yes			07-05-2008	06-01-2015		69846181.00	15120.00		SOCIEDADE TIMBLO IRMAOS LTD Rep Pandurang Timblo
32	092/52	SOCIEDADE TIMBLO IRMAOS LTD	Yes			17-07-2009	12-01-2015	75000000.00				SOCIEDADE TIMBLO IRMAOS LTD Rep Timblo
33	014/58	SOCIEDADE TIMBLO IRMAOS LTD	Yes		08-01-2015 (Mentions mining plan approved by IBM but no mention		12-01-2015	210000000.00				SOCIEDADE TIMBLO IRMAOS LTD Rep Timblo Pvt. Ltd.
34	045/52	SOCIEDADE TIMBLO IRMAOS LTD	Yes	Yes	02-08-2007 (Report not		05-11-2014		197195096.00	12168.00		SOCIEDADE TIMBLO IRMAOS
35	088/52	SOCIEDADE TIMBLO IRMAOS LTD	Yes	Yes	12-03-2013 (Report not received)		05-11-2014		145418383.00		28197.00	SOCIEDADE TIMBLO IRMAOS
36	016/51	VISHWASRAO.D.CHO WGULE	Yes			10-12-2008	24-12-2014		103734813.00	24600.00		Vijay V Chowgule legal heir of V D Chowgule
37	040/50	VISHWASRAO.D.CHO WGULE	Yes			29-09-2009	24-12-2014		84589476.00	25734.00		Vijay V Chowgule legal heir of V D Chowgule
38	062B/52	V.M.SALGADCAR & BRO.	Yes			30-05-2008	02-01-2015			15798.00	53660.00	V.M.SALGADCAR & Bro Pvt Ltd
39	019/58	VIVIAN COUTINHO	Yes			03-03-2009	02-01-2015		81411785.00	20029.00		V.M.SALGADCAR & Bro Pvt Ltd
40	029/54	V.M.SALGADCAR & IRMAOS	Yes	Yes	31-03-2008 (Report not Received)		06-11-2014		87076787.00	21974.00		V.M.SALGADCAR & Bro Pvt Ltd
41	083/52	V.M.SALGADCAR & I LTD	Yes	Yes	30-05-2008 (Report not		06-11-2014		151187352.00	28185.00		V.M.SALGADCAR & Bro Pvt Ltd

42	086/53	VASUDEVA MADEVA SALGAOCAR	Yes		09-01-2015 (Mentions mining plan approved by IBM but no mention		12-01-2015	180000000.00				Salitho Ores Pvt. Ltd.
43	019/52	VASUDEVA MADEVA SALGAOCAR	No			23-02-2009	06-01-2015			30000.00	200000.00	V.M.SALGAOCAR & Bro Pvt Ltd
44	044/56	FIRM V M SALGAOCAR & I LTD	No			06-05-2008	06-01-2015			27780.00	92600.00	V.M.SALGAOCAR & Bro Pvt Ltd
45	039/56	V.M.SALGAOCAR & BRO PVT LTD	No			26-05-2008	06-01-2015			61617.00	53890.00	V.M.SALGAOCAR & Bro Pvt Ltd
46	050/53	FIRM V M SALGAOCAR & I LTD	No	Yes	30-05-2008 (Report not		06-11-2014		136895151.00		14364.00	V.M.SALGAOCAR & Bro Pvt Ltd
47	013/55	FIRM V M SALGAOCAR & I LTD	No	Yes	03-05-2008 Report not received)		06-11-2014					V.M.SALGAOCAR & Bro Pvt Ltd
48	047/54	V.M.SALGAOCAR & IRMAQS LTD	No		03-03-2008 (Report not		06-01-2015			16890.00	56300.00	V.M.SALGAOCAR & Bro Pvt Ltd
49	041/55	V.M.SALGAOCAR & IRMAQS LTD	Yes		08-01-2015 (Mentions mining plan approved by IBM but no mention		12-01-2015	300000000.00				Salgaocar Mining Industries Pvt. Ltd.
50	003/51	FIRMA V.S.DEMPO & CIA LTD	Yes			15-05-2009	12-01-2015	39418540.00				Sesa Resources Ltd.
51	040/54	FIRMA V.S.DEMPO & CIA LTD	Yes			11-08-2009	12-01-2015	20581460.00				Sesa Resources Ltd.
52	035/52	FIRMA V.S.DEMPO & CIA LTD	No			15-05-2009	12-01-2015	300000000.00				Sesa Resources Ltd.
53	020/54	FIRMA V.S.DEMPO & CIA LTD	Yes			08-06-2009	12-01-2015	118451915.00				Sesa Resources Ltd.
54	021/54	FIRMA V.S.DEMPO & CIA LTD	Yes			17-07-2008	12-01-2015	85685161.00				Sesa Resources Ltd.
55	005/54	FIRMA V.S.DEMPO & CIA LTD	Yes			08-06-2009	12-01-2015	125862924.00				Sesa Resources Ltd.

56	002/51	M.S.TALAULIKAR & SONS	Yes			11-11-2008	06-01-2015		80406010.00	15115.00		M.S.TALAULIKAR
57	089/52	SOCIEDADE LITHOFERRO	Yes	Yes	14-10-2008 (Report not received)		05-11-2014					LITHOFERRO
58	004/49	RAJARAM N X BANDEKAR	Yes	Yes		24-06-2009	07-11-2014		123536383.00	28800.00		RAJARAM BANDEKAR (Sirgao) Pvt Ltd
59	008/61	BHASKAR HARI DALVI	Yes	Yes		09-03-2009	05-01-2015		3990028.00	19428.00		Madachem Bat Mines
60	004/55	SOCIEDADE MARZOOK & CADAR LTD	Yes		08-01-2015 (Mentions mining plan approved by IBM but no mention)		12-01-2015	75000000.00				MARZOOK & CADAR LTD
61	041/54	AHILIABAI DESSAI	Yes			28-07-2008	12-01-2015	180000000.00				AHILIABAI DESSAI
62	005/53	MARTINHO COUTINHO	No			07-05-2008	12-01-2015	150000000.00				Manquel Da Costa
63	029/55	ATCHUTA VISHNU S. VELINGKAR	No		05-01-2015 (Mentions Mining plan approved by IBM no mention of)		12-01-2015	84000000.00				ATCHUTA V S. VELINGKAR
64	014/52	BADRUDIN MAVANI	Yes		12-09-2013 (Report not received)		12-01-2015	120000000.00				Baddrudin Husainbhai Mavani
65	084/52	RAJARAM NARAYAN X BANDEKAR	Yes	Yes		06-02-2009	05-01-2015		158552928.00	29835.00		Bandekar Brothers Pvt Ltd
66	045/54	BHALCHANDRA A AVDE	Yes		07-01-2015 (Mention Mining plan approved by IBM no mention of report)		12-01-2015	225000000.00				Sova
67	110/53	JOSE COSME DA COSTA	Yes	Yes		03-07-2008 & 19-06-2014	12-01-2015	Nil	Nil	Nil	Nil	Cosme Costa & Sons
68	062A/52	D B BANDODKAR	No		15-04-2013 (Report not received)		06-01-2015		58673659.00	14532.00		(Shashikala Kakodkar & others)

69	008/41	GANGADHAR N.AGRAWAL	Yes	Yes	12-03-2013 Report not received		05-11-2014		178438462.00	29252.00		G N.AGRAWAL
70	006/61	GANGADHAR N.AGRAWAL	Yes			13-03-2013	02-01-2015		28501062.00	27672.00		G N.AGRAWAL
71	006/49	HIRALAL KHODIDAS	Yes		06-01-2015 (Mining Plan approved by IBM but no mention of report)		12-01-2015	Nil	Nil	Nil	Nil	HIRALAL KHODIDAS
72	055/51	MANDHAR H N PARULEKAR	Yes	Yes	12-03-2013 (Report not received)		05-11-2014		342032614.00	26267.00		Geetabala M N Parulekar
73	010/51	HAIDER CAXIMO CAN	Yes		02-01-2015 Mentions mining plan approved by IBM but no mention		12-01-2015	28643760.00				Haider Kasim Khan
74	040/51	NARAHARI S S NARVENKAR	Yes			05-10-2009	01-01-2015		61231425.00	29760.00		Rep by M/s N. S Narvekar
75	012/52	NARAHARI S S NARVENKAR	Yes			07-09-2009	01-01-2015		214133007.00	23267.00		Rep by M/s N. S Narvekar
76	008/50	RAJARAM RANGAJI POIGUINKAR	No			07-05-2008	12-01-2015					Ramakant Painquinkar
77	003/57	ROGHUVIR SINAI GARCO	No		06-01-2015 (Report not received within		12-01-2015	154702675.00				Kunda Gharse
78	033/57	ROGHUVIR SINAI GARCO	No			10-12-2008	12-01-2015	120590736.00				ROGHUVIR SINAI Gharse
79	019/54	ROGHUVIR SINAI GARCO	No			10-12-2008	12-01-2015	129706591.00				Kunda Gharse
80	051/52	ROGHUVIR SINAI GARCO	Yes	Yes	03-03-2008 (Report not		06-11-2014		130012302.00			Kunda Gharse
81	070/51	RAMAKANTA XETIE	Yes			13-05-2009	09-01-2015	Nil	Nil	Nil	Nil	R S Shetye & Bros
82	024/57	RAMACANTA VISNUM VELINGKAR	Yes		05-01-2015 (Mentions Mining plan approved by IBM no mention of		12-01-2015					RAMACANTA V S VELINGKAR

83	016/55	VASSUDEVA GUIRI QUENIM	Yes			18-12-2008	06-01-2015	131100000.00	75936945.00	17037.00		V G Quenim
84	059/51	ZOIRAM B NEUGI	Yes			16-11-2009	12-01-2015	32720400.00				Zoiram Neogui
85	014/53	Sociedade Timblo Irmaos Ltd	Yes			09-02-2012	01-01-2015		114694578.00	22563.00		Sociedade Timblo Irmaos Ltd
86	048/58	Caxinata Deu Saupto Taulicar	Yes		02-01-2015 (Report not received)		12-01-2015	30000000.00				Kashinath D S Taulikar
87	034/50	Sociedade Timblo Irmaos Ltd	Yes			20-04-2009	06-01-2015			26850.00	71600.00	Sociedade Timblo Irmaos Ltd Rep Pandurang Timblo Industries
88	029/52	Vasudeva D. S. Cosambo	Yes			09-04-2009	06-01-2015			21359.00	569581.00	Prasad Timblo

Note* IBM recommendations are in connection with applications for renewal of lease under 8(2) of the MMDR Act 1957