STATE ENVIRONMENT IMPACT ASSESSMENT AUTHORITY, ODISHA
5RF-2/1, Unit-IX, Bhubaneswar-751022, Tel: 0674-3512840, Email: seiaaodisha@gmail.com
(A statutory body constituted by Ministry of Environment, Forest & Climate Change under Environment (Protection) Act, 1986)

Letter No. 6710/SEIAA **Dated** 03.09.2025.

To

M/s. NENO Technical Services
At-Ananta Niwas, Plot No.-576/4502,
Jagannath Vihar, Airfield, Sundarpada,
Bhubaneswar, Pin-751002,
Dist-Khordha, Odisha

Sub: Debarment of M/s. NENO Technical Services from submitting any reports, documents to SEIAA, Odisha for obtaining Environmental Clearance-regarding.

Ref: (i). Our Show Cause Notice letter no. 6609/SEIAA dated 24.07.2025 and subsequent letter no. 6662/SEIAA dated 19.08.2025
(ii). Reply of Show Cause Notice submitted by M/s. NENO Technical Services dated 05.08.2025 and 25.08.2025 received through email.

Sir,

In above cited subject, I herewith to inform you that the explanation/clarification furnished by you in respect of Show Cause Notice dated 27.07.2025 & 19.08.2025 issued by SEIAA, Odisha is not specific and does not give proper justification for such misleading reports with respect to Annual Rate of Replenishment Study (ARRS) report. From your submission it is very clear that you have doing such unrealistic assessment of replenishment of sand in the past favoring to the project proponent/lessee/lease holder for unstainable sand mining therefore, consequent scenario is entitled damage to the river.

Therefore, for the best intension for the intervention flow of river, protection in river embankment and encouraging un-sustainable sand mining by furnishing such false report. The Authority **hereby debarred M/s. NENO Technical Services** for submitting any Mining Plan, ARRS report and any other reports, documents

SEIAA, Odisha for obtaining Environment Clarance (EC) in terms of provision of EIA Notification, 2006 **for a period of Twelve Months (12 Months) from the date of issue of this letter**.

By order and Authority of SEIAA, Odisha,

Encl: As above

Member Secretary

Copy forwarded to

1. The Chief Executive Odisha Space Applications Centre (ORSAC), Bhubaneswar for delisting the consultant M/s. Nano Technical Service for further empanel.
2. The Director of Mines, Steel & Mines Dept, Govt. of Odisha Bhubaneswar for information and necessary action.
3. The Director Minor Mineral, Steel & Mines Dept, Govt. of Odisha Bhubaneswar for information and necessary action.
4. The Secretary, State Expert Appraisal Committee, (SEAC), Odisha for information and necessary action.
5. The All Collector & District Magistrates of Odisha for necessary action.
6. The All Deputy Director of Mines of Different District of Odisha and All the Mining Officers of Different District of Odisha for necessary action.

Member Secretary

STATE ENVIRONMENT IMPACT ASSESSMENT AUTHORITY, ODISHA
5RF-2/1, Unit-IX, Bhubaneswar-751022, Tel: 0674-3512840, Email: seiaaodisha@gmail.com
(A statutory body constituted by Ministry of Environment, Forest & Climate Change under Environment (Protection) Act, 1986)

Letter No. 6609/SEIAA **Dated** 24-07-2025

To

The NENO Technical Services
At-Ananta Niwas, Plot No.-576/4502,
Jagannath Vihar, Airfield, Sundarpada,
Bhubaneswar, Pin-751002,
Dist-Khordha, Odisha

Sub: Proposal for Amendment EC of Atigaon Sand Bed over an Area of 12.355 Acres or 5.00 Hectares in Village Atigaon under Junagarh Tahasil of Kalahandi District, Odisha - Show Cause Notice regarding.

Ref: Online Proposal No. SIA/OR/MIN/521013/2025 dated 28.01.2025.

Sir,

It is noticed that for the above mentioned proposal, EC was granted earlier by SEIAA vide EC identification no. 10163/SEIAA Dated. 17.12.2020 and Transfer of EC was issued on 04.03.2024 in favour of Sri Uttam Kumar Dash (successful bidder) and the mining plan was approved on 04.08.2020 wherein the mineable reserve was 39096 cum with a depth of sand 1.8 meter and the proposed production per annum was 2007 cum. The SEIAA has permitted EC with allowing the extraction quantity of sand 2007 cum in 1st year lease period with depth of mining 1.8 meter subject to condition ARRs report be submitted by 15.11.2021. Now, the project proponent (PP) have submitted the proposal for Amendment of EC in light of replenishment study report along with the modified mining plan approved on 12.03.2024 showing the mineable reserve was 29870 cum with a depth of sand 2.4 meter and the proposed annual extraction quantity of sand 7000 cum/annum. Further, it is noted that the Neno Technical Services has done the Annual Rate of Replenishment Study (ARRS) report for Atigaon River Sand Bed over an area of

12.355 Acres or 5.00 Ha. in Village Atigaon under Junagarh Tahasil of Kalahandi District for Sri Uttam Kumar Dash who has submitted an application for amendment of EC on 28.01.2025. In the said ARRS report done by Neno Technical Services, it was mentioned that **17970 cum** of sand has been replenished in the proposed lease area. Later on, M/s. Neno Technical Services has revised the report and submitted on 19.04.2025, showing the annual replenishment sand as **7859 cum**. It is not known under what circumstances, both the reports are different.

Similarly, the M/s. Neno Technical Services consultant has submitted ARRS report in different Amendment of EC projects proposal to SEIAA, Odisha are as follows:

Sl. No.	Name of the River	Quantity of Sand Replenished in Cum	Proposal Number	Name of the Consultant
1.	Sundar	8784	SIA/OR/MIN/532534/2025	M/s. Neno Technical Services
2.	Suktel	38910	SIA/OR/MIN/540989/2025	-do-
3.	Suktel	22281	SIA/OR/MIN/541115/2025	-do-
4.	Harihara Jora	22946	SIA/OR/MIN/536470/2025	-do-
5.	ONG	12106	SIA/OR/MIN/533005/2025	-do-
6.	Lant	98880	SIA/OR/MIN/535197/2025	-do-
7.	Mahanadi	26393	SIA/OR/MIN/536575/2025	-do-
8.	Udanti	34949	SIA/OR/MIN/533304/2025	-do-
9.	Tel	16240	SIA/OR/MIN/533458/2025	-do-
10.	Sungarh	29515	SIA/OR/MIN/535139/2025	-do-
11.	Sundar	30484	SIA/OR/MIN/533568/2025	-do-
12.	Tel	28331	SIA/OR/MIN/534881/2025	-do-
13.	Tel	59176	SIA/OR/MIN/537546/2025	-do-

The above-mentioned replenished quantity of sand estimated basically in the Sl. No. 02, 03, 04, 06, 08, 10, 12 & 13 is not possible. This shows unprofessional and lackadaisical approach by the consultant M/s. Neno Technical Services in preparation and submission of replenishment study report for grant of Environmental Clearance (EC), Transfer of EC & Modification of EC.

The M/s. Neno Technical Services had done arbitrarily in conducting the ARRS and the Firm has been submitting misleading report to SEIAA, Odisha.

It is surprising to note that 26.393 cum replenishment of sand is recorded in river Mahanadi while the replenishment of 98.880 cum has been estimated in a small river named Lant, 34.949 cum in river Udanti and 59.176 in river Tel.

Hence, this Authority has decided to issue Show Cause Notice to the consultant i.e. M/s. Neno Technical Services as to why the firm shall not be blacklisted for such misleading reports.

You are hereby called on explain why your registration should not be blacklisted/debarred for further preparation of replenishment study report, Mining Plan and any other documents for minor mineral and submit to SEIAA, Odisha for any environmental clearance (EC).

Your reply should reach to SEIAA, Odisha (email-seiaaodisha@gmail.com) within 15 days failing which it will be presumed that you have no explanation to submit and action is deemed proper shall be taken by the Authority bearing on available records.

By order and Authority of SEIAA, Odisha

24/07/25

Member Secretary

NENO TECHNICAL SERVICES

(Near to True Value)

To
The Member Secretary
State Environment Impact Assessment Authority, Odisha
5RF-2/1, Unit-IX, Bhubaneswar – 751022

Date : 5th August, 2025

Sub: Proposal for Amendment of Environmental Clearance (EC) for Atigaon Sand Bed over an Area of 12.355 Acres (5.00 Hectares) in Village – Atigaon, under Junagarh Tahasil of Kalahandi District, Odisha – Submission in response to Show Cause Notice.

Ref: Letter No. 6609/SEIAA, dated 24.07.2025

Respected Sir,

With reference to the above-mentioned subject and your esteemed letter cited under reference, we acknowledge the concerns raised by your good office regarding the grant of Environmental Clearance (EC) for the Atigaon Sand Bed project, specifically with respect to the Annual Rate of Replenishment Study (ARRS).

We highly appreciate the detailed and constructive observations made in your letter, which reflect the commitment of SEIAA to ensure scientific rigor and environmental responsibility in all project assessments.

In the SEAC minutes, a formula was proposed to calculate the replacement volume and to identify the common safe workable area. The replacement volume is treated as a variable in both reports. We have also been largely satisfied with SEAC's assistance in helping us prepare the ARSS report.

The estimated replacement volume of **98,880 cum** mentioned for the small river named *Lant* is a typographical error made by our technical staff and reflected by the software used. This was a serious oversight and we acknowledge it as a blunder. We sincerely regret the mistake and assure you that strict measures are being taken to prevent such errors in the future.

We sincerely regret any discrepancies or shortcomings that may have been found in the submitted documents or methodologies. Please accept our heartfelt apologies for the same. We assure you that there was no intentional lapse and that we remain committed to upholding the highest standards of environmental compliance and professional integrity.

Our organization continuously strives to deliver quality and accurate outcomes by engaging qualified technical personnel and utilizing standard instruments and best practices. We take your observations seriously and assure you that any deviations will be promptly addressed and rectified with due diligence.

We humbly request your esteemed authority to kindly consider our submission with compassion and allow us to continue our operations in accordance with your guidelines. We remain committed to implementing all necessary corrective measures and to ensuring compliance with SEIAA's directives in both letter and spirit.

Thank you for your guidance and continued support.

With sincere regards,
Yours faithfully,
For Neno Technical Services

(N. Nayak)
Authorized Signatory

ANANTA NIWAS, PLOT NO-576/4502, JAGANNATH VIHAR, SUNDARPADA, BHUBANESWAR-751002, Ph.0674-2355490, 9178145817

STATE ENVIRONMENT IMPACT ASSESSMENT AUTHORITY, ODISHA
5RF-2/1, Unit-IX, Bhubaneswar-751022, Tel: 0674-3512840, Email: seiaaodisha@gmail,com
(A statutory body constituted by Ministry of Environment, Forest & Climate Change under Environment (Protection) Act, 1986)

Letter No. 6662/SEIAA **Dated** 19.08.2025.

To

The NENO Technical Services
At-Ananta Niwas, Plot No.-576/4502,
Jagannath Vihar, Airfield, Sundarpada,
Bhubaneswar, Pin-751002,
Dist-Khordha, Odisha

Sub: Reply on Show Cause Notice letter no. 6609/SEIAA issued dated 24.07.2025-regarding.

Ref: (i). Our Show Cause Notice letter no. 6609/SEIAA dated 24.07.2025
(ii). Reply of Show Cause Notice submitted dated 05.08.2025 received through email.

Sir,

This is in continuation to the SEIAA, Odisha earlier Show Cause letter no. 6609/SEIAA dated 24.07.2025 highlighting the points that the Neno Technical Services has sumitted the Annual Rate of Replenishment Study (ARRS) report for Atigaon River Sand Bed over an area of 12.355 Acres or 5.00 Ha. in Village Atigaon under Junagarh Tahasil of Kalahandi District for Sri Uttam Kumar Dash who has submitted an application vide online Proposal No. SIA/OR/MIN/521013/2025 for amendment of EC on 28.01.2025. In the said ARRS report done by Neno Technical Services, it was mentioned that **17970 cum** of sand has been replenished in the proposed lease area. Later, M/s. Neno Technical Services has revised the report and submitted on 19.04.2025, showing the annual replenishment sand as **7859 cum**. It is not known under what circumstances, both the reports are different.

Similarly, the M/s. Neno Technical Services consultant has submitted ARRS report in different Amendment of EC projects proposal to SEIAA, Odisha in

different river named as Sunder, Suktel, Harihar Jora, ONG, Lant, Mahanadi, Udanti, Tel, Sungarh, Sundar etc. with largely variable and high replenished quantity of sand for different sources are not possible. This shows unprofessional and lackadaisical approach by the consultant M/s. Neno Technical Services in preparation and submission of replenishment study report for grant of Environmental Clearance (EC), Transfer of EC & Modification of EC.

The M/s. Neno Technical Services had done arbitrarily in conducting the ARRS and the Firm has been submitting misleading report to SEIAA, Odisha.

It is surprising to note that 26,393 cum replenishment of sand is recorded in river Mahanadi while the replenishment of 98,880 cum has been estimated in a small river named Lant, 34,949 cum in river Udanti and 59,176 in river Tel.

Hence, this Authority has decided to issue Show Cause Notice to the consultant i.e. M/s. Neno Technical Services as to why the firm shall not be blacklisted for such misleading reports. Accordingly, a Show Cause notice was issued to the consultant vide letter no. 6609/SEIAA dated 24.07.2025.

On reply of our show cause notice, the consultant M/s. Neno Technical Services vide letter dated 05.08.2025 had replied that the estimated replenished volume of sand 98,880 cum mentioned for the small river named *Lant* is a typographical error made by our technical staff and reflected by the software used. But the consultant has not mentioned the replenished quantity 26,393 cum in river Mahanadi, 34,949 cum in river Udanti and 59,176 in river Tel. The clarification submitted by you is not acceptable.

In view of the above, the reply of the consultant is not satisfactory and the consultant misleading the Authority with submitting unrealistic replenishment study report in different EC application to SEIAA, Odisha.

You are hereby called on explain why your registration should not be blacklisted/debarred for further preparation of replenishment study report, Mining Plan and any other documents for minor mineral and submit to SEIAA, Odisha for any environmental clearance (EC).

Your reply should reach to SEIAA, Odisha (email-seiaaodisha@gmail.com) within 07 days from the date of receipt of this reminder letter failing which it will be presumed that you have no explanation to submit and action as deemed proper shall be taken by the Authority basing on available records.

By order and Authority of SEIAA, Odisha

19/08/25

Encl: As above

Member Secretary

Letter No. : NTS/02/2025-26/SEIAA **Date : 25th August,2025**

To
The Member Secretary
State Environment Impact Assessment Authority, Odisha
5RF-2/1, Unit-IX, Bhubaneswar – 751022

Sub: Submission of Show cause notice reply, which is issued by SEIAA vide letter no: 6662/SEIAA ON DATED 19.08 2025.

Ref: Letter No. 6662/SEIAA, dated 19.08.2025

Respected Sir,

With reference to the above Show Cause Notice and subsequent reminder, we, **M/s. Neno Technical Services**, wish to submit our explanation and clarification as follows:

We highly appreciate the detailed and constructive observations made in your letter, which reflect the commitment of SEIAA to ensure scientific region and environmental responsibility in all project assessments.

We are sincerely thankful to you for kindly accepting the **Lant River case**, as we had submitted our genuine grounds in the previous letter.

Common Safe Workable Area Method

1. **Previous Method of Calculation**
   - Earlier, the replenishment quantity was calculated by taking the difference in volume between *pre-monsoon* and *post-monsoon* survey data in entire lease area.
2. **Revised Method as per SEAC Minutes**
   - As per SEAC directions, first the *common safe workable area* is finalized.
   - After finalization, the replenishment volume is calculated within this defined common shape/area.
   - Hence, the replenishment volume derived under this method differs from the earlier approach.
3. **Tributary Rivers**
   - Rivers like **Tel, Sunder, Suktel, Harihar Jor, Udanti, Sungarh, Ong, and Lant** are tributaries of the **Mahanadi River**.
4. **Replenishment Study Approach**
   - The replenishment quantity is calculated for small areas of the river (maximum 5 ha or less).

- This means the replenishment study provides results for small patches only, not the entire river stretch.
- Therefore, it gives a localized idea of replenishment and not a complete picture of river-wide replenishment potential.

5. **Location of Sand Quarries**

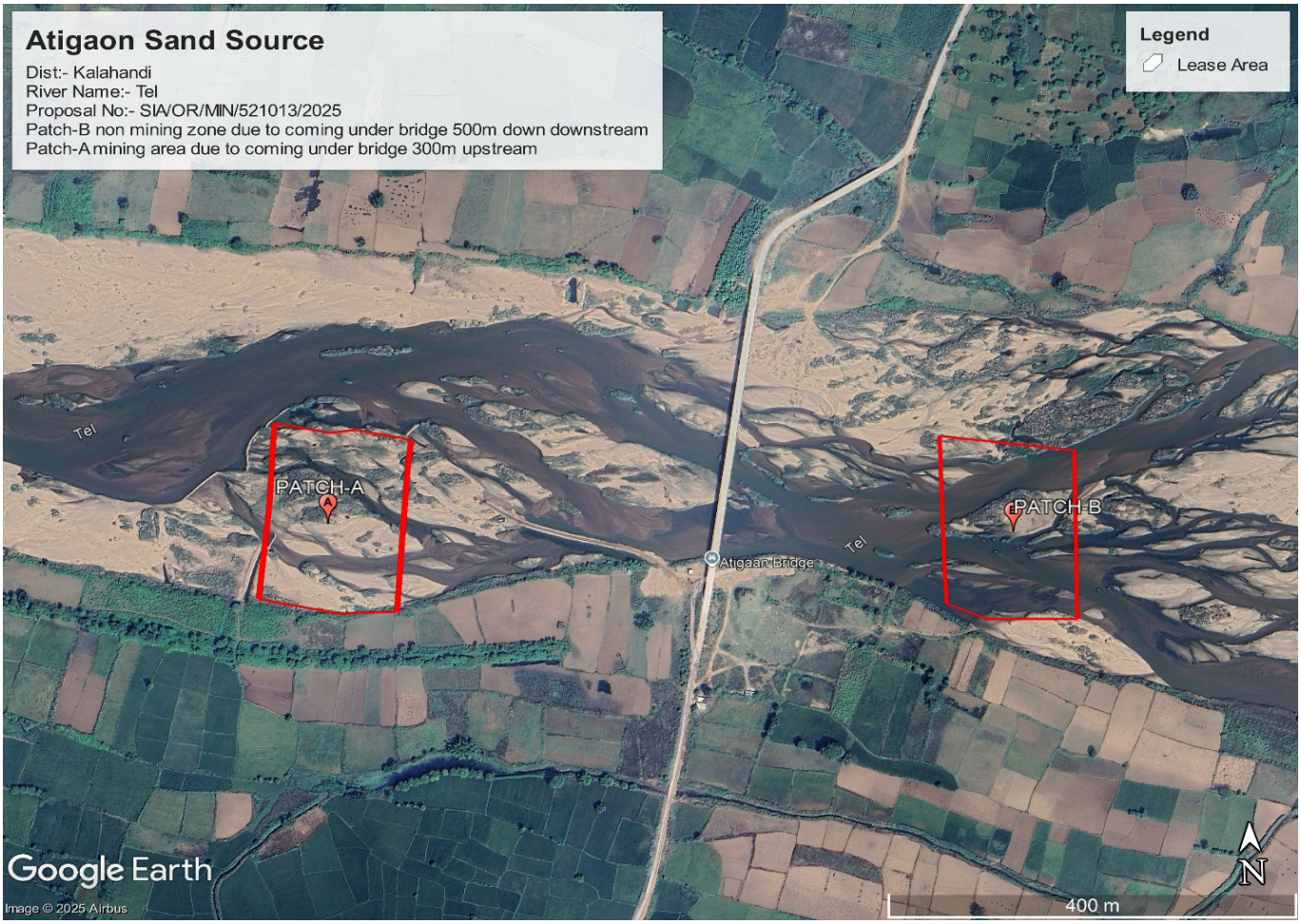
- All sand quarries in the study area are located along river meanders.
- **River meanders** are natural winding curves in a river course, formed due to lateral erosion on the outer bends and deposition on the inner bends.

In Other cases, various factor affected to volume of replacement varies in various rivers like Tel, Sunder, Suktel, Harihar Jor, Udanti, Sungarh, Ong, and Lant are tributaries of the Mahanadi River.

The specific area of the Mahanadi River where the **Rahila Sand Bed** (Proposal **No.SIA/OR/MIN/536575/2025)** is located is predominantly covered with natural rock masses. During flood events, the region experiences high turbulence, which significantly limits the deposition of new sediments. As a result, replenishment in this particular area is very minimal. Map and details placed at point no – **8.0**

1.0 Observations of Atigaon Sand Bed (Proposal No. SIA/OR/MIN/521013/2025) (Tel River):

- In the initial ARRS report, a replenishment figure of **17,970 cum** was reported.
- Subsequently, after verification, SEAC in compliance with ADS to re-assessment of the common safe workable area for sand replenishment. Following re-verification and considering the hydro-geomorphological characteristics of the area, the corrected replenishment volume was determined to be **7,859 cubic meters**."
- The first figure was based on preliminary field inputs, which contained calculation inconsistencies that were later rectified in the revised submission dated 19.04.2025.



2.0 Observation on Proposal ID: SIA/OR/MIN/532534/2025

- **Lease Area: Chandatora Sand Bed**
- **Location:** Situated 500 m downstream of the Siendheikela Bridge.
- **Mining Zone Demarcation:**
  - About 70% of the lease area overlaps with the No Mining Zone (restricted area due to proximity to bridge/other regulatory constraints).
  - Only 30% of the lease area falls under the safe mining zone.
- **Replenishment Volume:** The calculation has been carried out only over the safe mining zone, yielding a replenishment potential of 8,784 Cum.

Implications

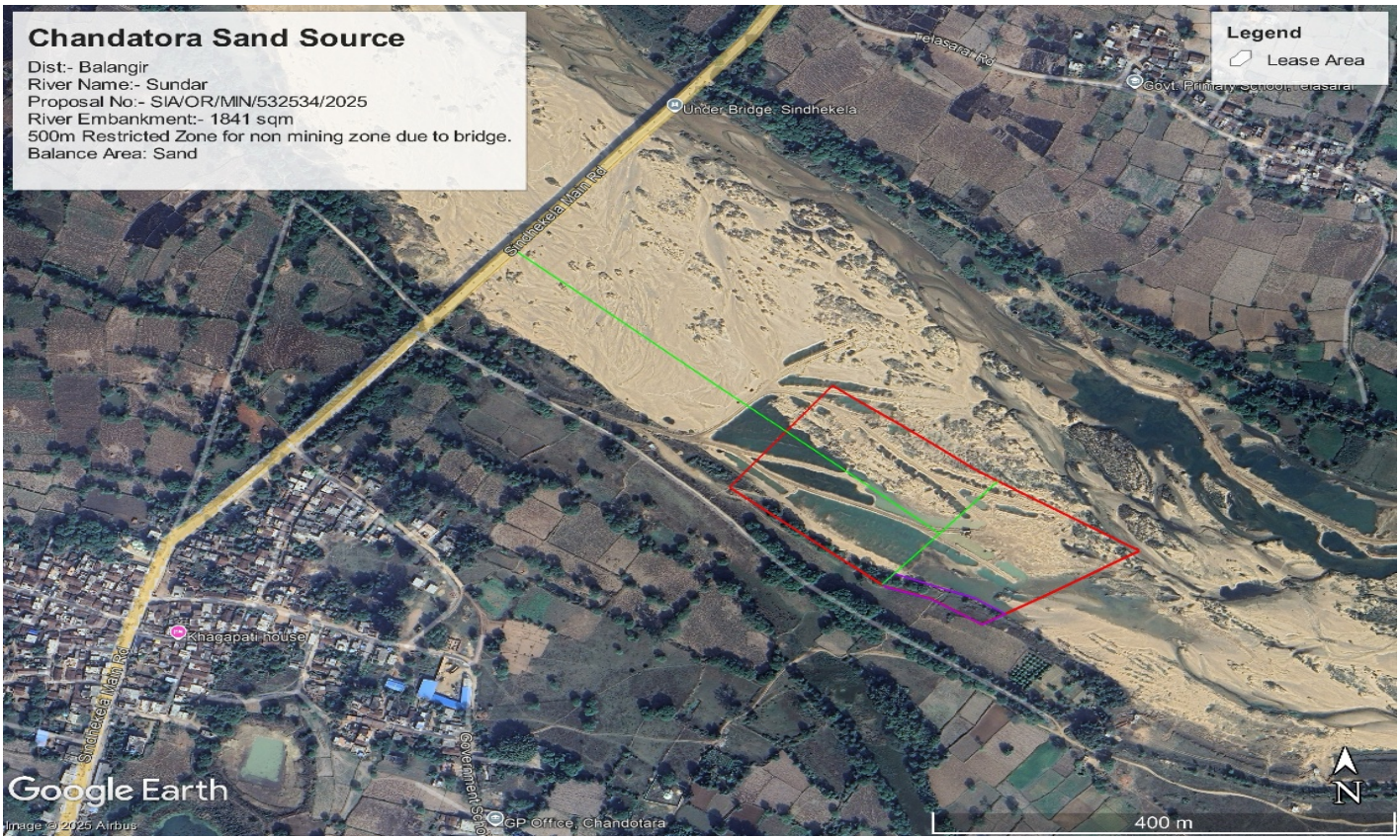
1. Limited workable area: With 70% restricted, effective mining potential is confined to a much smaller portion of the lease.

2. Sustainable extraction: The 8,784 Cum replenishment reflects the actual sustainable yield, ensuring extraction does not exceed natural deposition.

3. Regulatory compliance: Mining activities must remain confined strictly to the designated 30% safe zone.

Conclusion

The Chandatora sand bed on the Sunder River has a restricted workable zone due to proximity to the Siendheikela Bridge. However, within the safe mining zone, a replenishment volume of 8,784 Cum is available, making the site suitable for limited and regulated sand extraction.



3.0 Observation on Proposal ID: SIA/OR/MIN/540989/2025

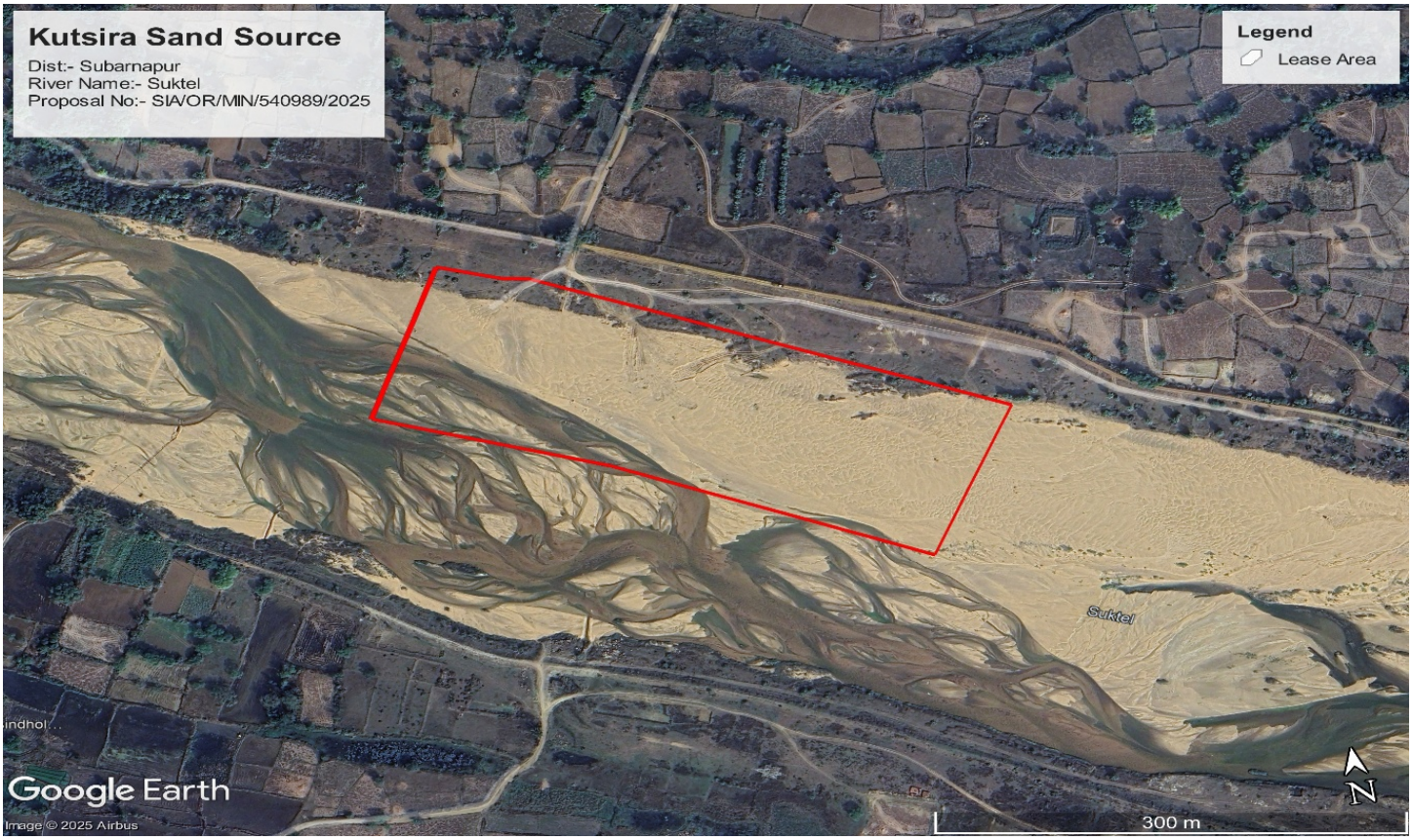
- **Lease Area**: Kutasira Sand Quarry, Suktel River.
- **Location & Setting**: The lease area lies within the mainstream channel flow of the Suktel River.
- **River Stage**: At this location, the Suktel River is in a mature (old) stage of fluvial development, characterized by a broad river channel and steady discharge regime.
- **Sediment Dynamics**: The river maintains consistent sediment transport, leading to continuous sand deposition across the channel.

Implications

1. **High replenishment**: Mainstream positioning ensures **active sand inflow and deposition**, making the site suitable for regular replenishment.
2. **Favourable geomorphology**: Broad channel and mature stage favor **stable deposition zones** rather than erosive conditions.
3. **Sustainability**: With proper monitoring, the site can support **sustainable sand extraction** without risk of over-mining.

Conclusion

The **Kutasira Sand Quarry on the Suktel River** is a **suitable lease area for sand mining**, as its position within the **mainstream flow of a mature river system ensures high sand deposition and continuous replenishment**.



4.0 Observation on Proposal ID: SIA/OR/MIN/541115/2025

- Lease Area: Taraikela Sand Bed, Suktel River.
- Geomorphological Setting: The lease area is positioned along the inner curve of a meander, where river velocity decreases, and natural depositional processes dominate.

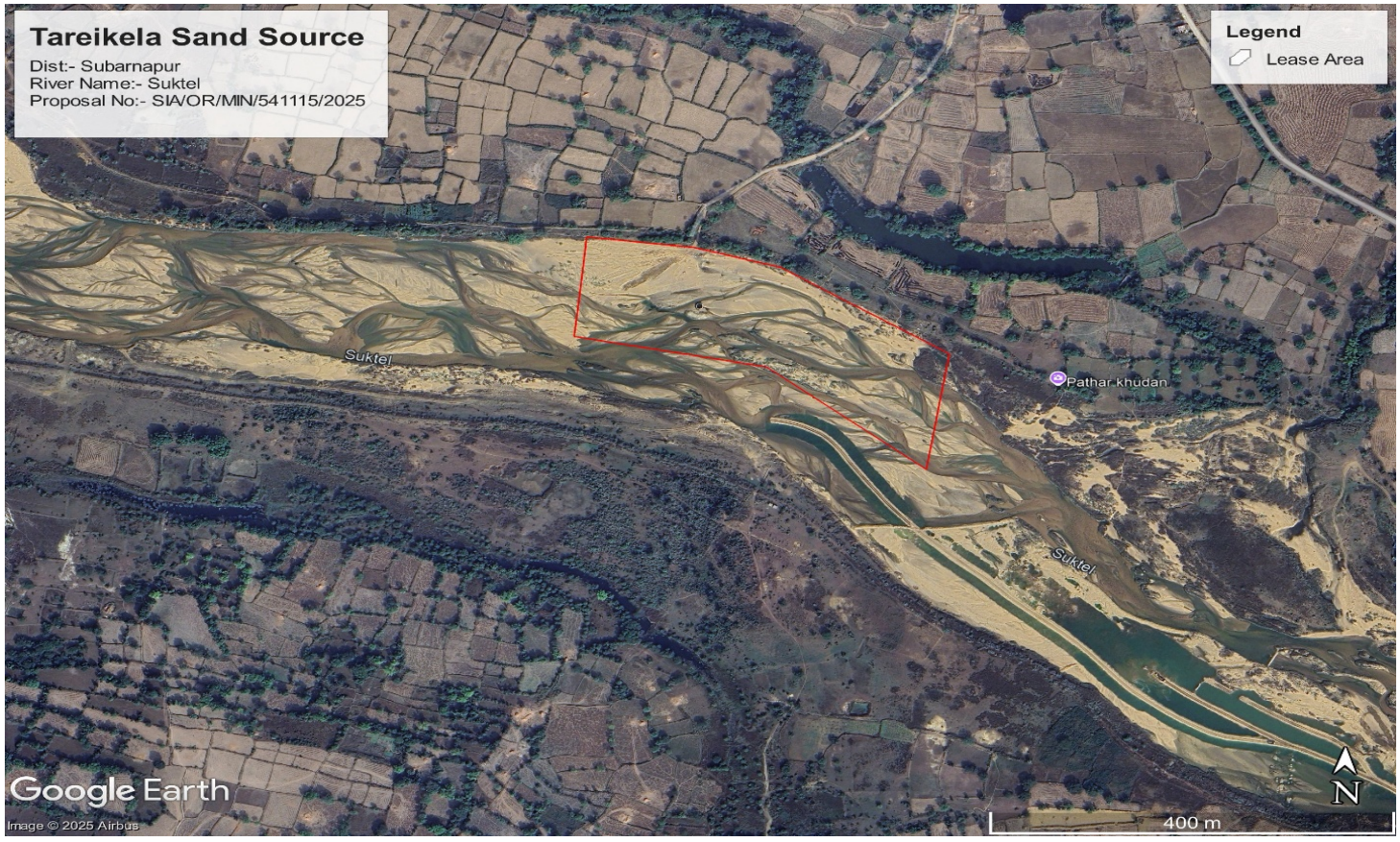
- Sediment Dynamics: Inner meander bends act as active sediment traps, promoting continuous sand accumulation during seasonal flows.

Implications

1. High sand deposition: The meander setting ensures abundant sediment supply and deposition.
2. Sustainable replenishment: Annual monsoon-driven flows replenish sand volumes consistently, making the site viable for regulated extraction.
3. Favourable lease area: The geomorphic advantage provides a stable and renewable sand resource compared to straight channel sections.

Conclusion

The Taraikela Sand Bed on the Suktel River is a suitable lease area for sand mining, as its inner meander location ensures high natural deposition and sustainable replenishment.



5.0 Observation on Proposal ID: SIA/OR/MIN/536470/2025

- Lease Area: Harihara Jora – Jatasingha, Odisha.
- Hydrological Setting:

- The Harihara Jora is a tributary that merges with the Mahanadi River system.
- The river gradient is very low, resulting in a gentle slope and reduced water velocity.

➢ Sediment Dynamics:

- The low gradient slows down the flow, causing high sand deposition in the tributary–mainstream junction zone.
- This geomorphic condition makes the area a natural sediment sink.

Implications

1. Favourable for sand deposition: Due to low velocity and slack water conditions, sediment accumulation is significant.
2. Sustainable potential: If regulated, extraction may be balanced with the naturally high replenishment from the Mahanadi system.
3. Caution required: Excessive mining could disturb the delicate hydrological balance of the tributary–mainstream confluence.

Conclusion

The Harihara Jora – Jatasingha sand bed represents a high sand deposition zone due to its low river gradient and tributary–Mahanadi confluence setting. The site is geomorphologically suitable for sand accumulation, but requires careful monitoring to ensure sustainable extraction.

6.0 Observation on Proposal ID: SIA/OR/MIN/533005/2025

- Lease Area: Kumbhari Sand Bed, Tel River.
- Extraction Status: The extraction of mineral is low, meaning only a limited volume of sand is being removed.
- Replenishment Status: The replenishment volume is also low, as the natural sediment deposition rate from upstream flow is minimal.
- Balance: With both extraction and replenishment being low, the sustainable yield remains marginal, and the deposit is not a robust sand resource compared to other stretches of the Tel River.

Implications

1. Low replenishment zone: The site does not benefit from high annual sediment inflow, limiting future extraction potential.

2. Sustainability concern: Although extraction is low, the limited replenishment means over-mining risk still exists if volumes exceed natural recovery.

3. Caution for approval: Mining activity should be restricted to match the modest replenishment rate, ensuring no long-term depletion of the sand bed.

Conclusion

The Kumbhari Sand Bed on the Tel River is a low-replenishment zone, with limited extraction potential. Sustainable mining is possible only under strict regulation of extraction volumes in line with the low natural replenishment capacity.

7.0 Clarification on Proposal ID: SIA/OR/MIN/535197/2025 (Lant River Sand Bed)

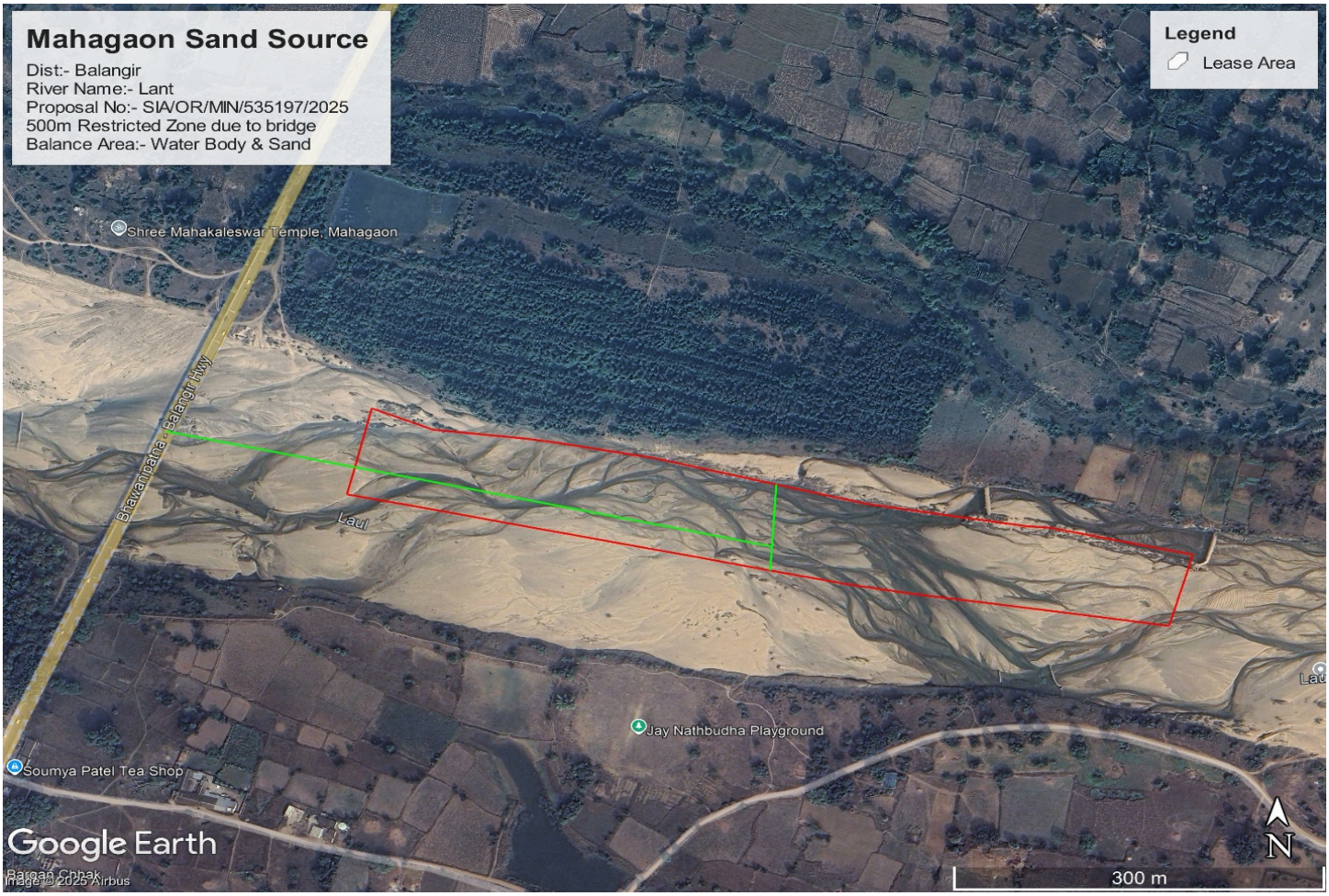
It has come to our notice that the **estimated replenishment volume of 98,880 cum** mentioned in the proposal is **erroneous**. This figure was inadvertently generated due to a **typographical mistake by our technical staff** and subsequently carried forward by the software used in preparing the report.

We acknowledge this as a **serious oversight** and sincerely **regret the error**. The actual replenishment capacity of the Lant River is considerably lower, and the incorrect figure should not be considered for evaluation.

To ensure such mistakes do not recur, we are implementing the following corrective measures:

1. **Multi-tier data verification** before submission.
2. **Cross-checking replenishment estimates** against hydrological and sediment transport data.
3. **Independent review of technical reports** prior to upload.

We assure the Hon'ble Authority that we take this matter with utmost seriousness and are committed to maintaining **accuracy, transparency, and compliance** in all future submissions.



8.0 Observation on Proposal ID: SIA/OR/MIN/536575/2025

- **Proposed Lease Area**: Located ~500 m away from the **main Mahanadi River stream**, adjacent to the **river embankment**.
- **Geological Setting**: The site is **enclosed by basement rock patches**, restricting open hydraulic connectivity with the active river channel.
- **RL (Reduced Level) Difference**: The site has a **2 m elevation difference** compared to the adjoining riverbed.

Implications for Sediment Deposition

1. **Unfavourable gradient**: The 2 m RL difference creates a higher elevation zone, which prevents active sediment inflow from the main river.
2. **Restricted sediment pathways**: Basement rock patches act as natural barriers, limiting free movement of suspended load and bed load during monsoon floods.
3. **Distance from active stream**: Being 500 m away from the main river course reduces direct sand replenishment compared to the central riverbed zones.

Conclusion

Due to these site-specific conditions, the **proposed lease area experiences significantly lower sand replenishment** than normal deposition observed within the active Mahanadi riverbed. This makes the location **unsuitable for long-term, sustainable sand extraction**, as extraction volumes will likely exceed replenishment rates.

9.0 Observation on Proposal ID: SIA/OR/MIN/533304/2025

- **Lease Area**: Kantamala Sand Bed, Udanti River.

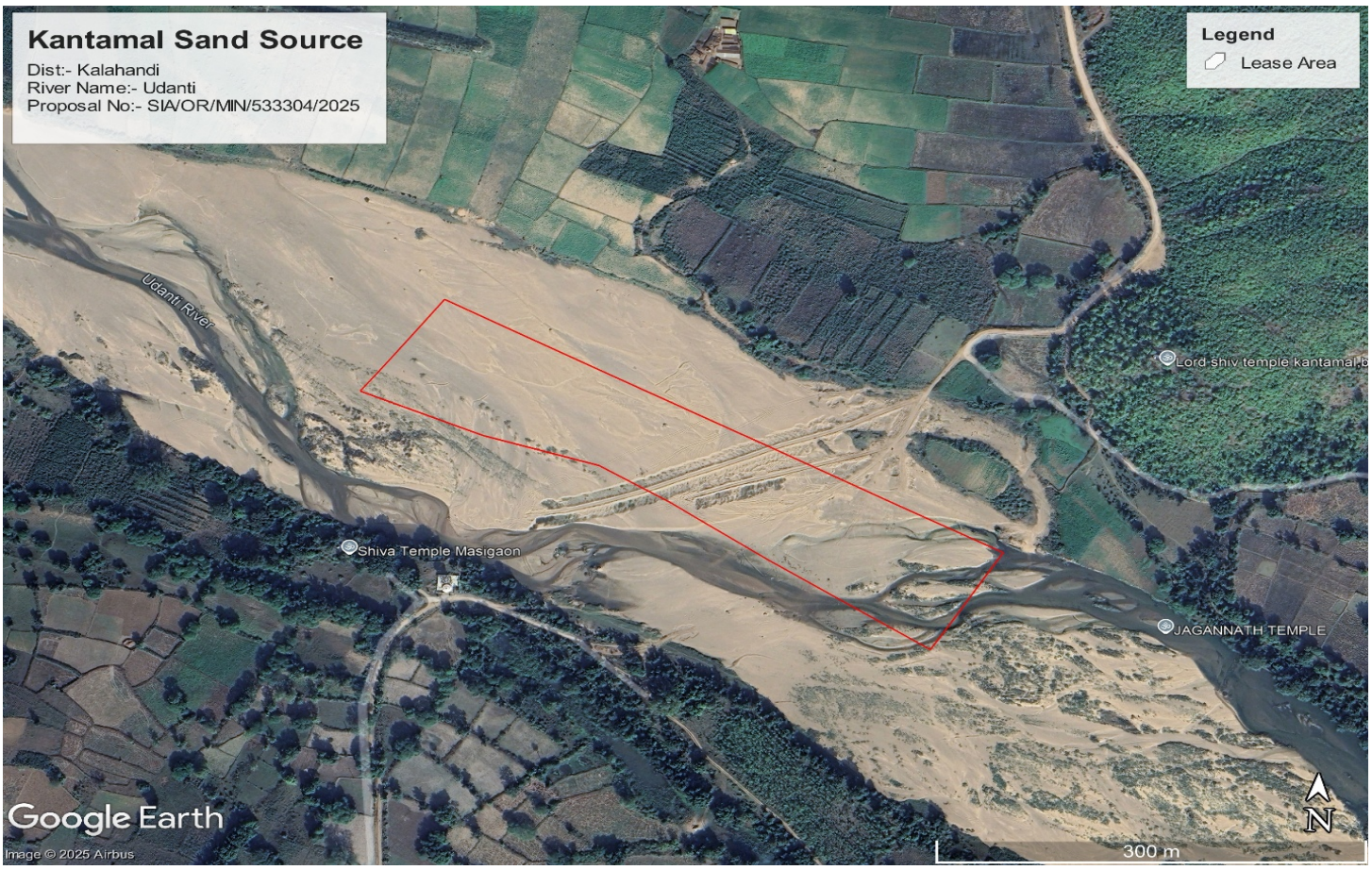
- **Sand Availability**: The site falls within a **suitable sand deposition zone**, well-connected with the active river channel.
- **Replenishment**: The lease area experiences **high natural replenishment** due to the Udanti River's sediment transport dynamics.

Implications

1. **Favourable for sustainable mining**: Since the replenishment volume is high, extraction can be balanced with natural deposition.
2. **Hydrological advantage**: The lease area is positioned within the **active floodplain**, allowing continuous sediment inflow during monsoon flows.
3. **Low environmental risk (if regulated)**: With proper monitoring and scientific mining practices, the site can support extraction **without long-term depletion** of sand reserves.

Conclusion

The **Kantamal sand bed** under the Udanti River qualifies as a **sustainable lease area** owing to its favorable geomorphological conditions and **high replenishment rate**.



10.0 Observation on Proposal ID: SIA/OR/MIN/533458/2025

- **Lease Area**: Kantesir Sand Bed, Tel River.
- **Extraction Status**: Previous year's **extraction volume was low**.
- **Replenishment**: Correspondingly, the **replenishment volume is also low**, since natural replenishment is influenced by extraction dynamics and sediment inflow from upstream.

Implications

1. **Low replenishment zone**: With reduced extraction, the active scouring and sediment inflow are minimized, leading to low measurable replenishment in this stretch.
2. **Hydrological condition**: The Tel River here shows **limited sediment transport**, resulting in smaller deposition compared to high-flow or central channel zones.
3. **Mining feasibility**: Although extraction pressure is low, the **available replenishment does not indicate a robust deposit**, so large-scale mining may not be sustainable.

Conclusion

The **Kantesir sand bed** shows **low replenishment due to both low extraction in the previous cycle and natural river dynamics**. Caution should be exercised in determining extraction limits so that mining remains within the **sustainable replenishment capacity** of the site.

11.0 Observation on Proposal ID: SIA/OR/MIN/535139/2025

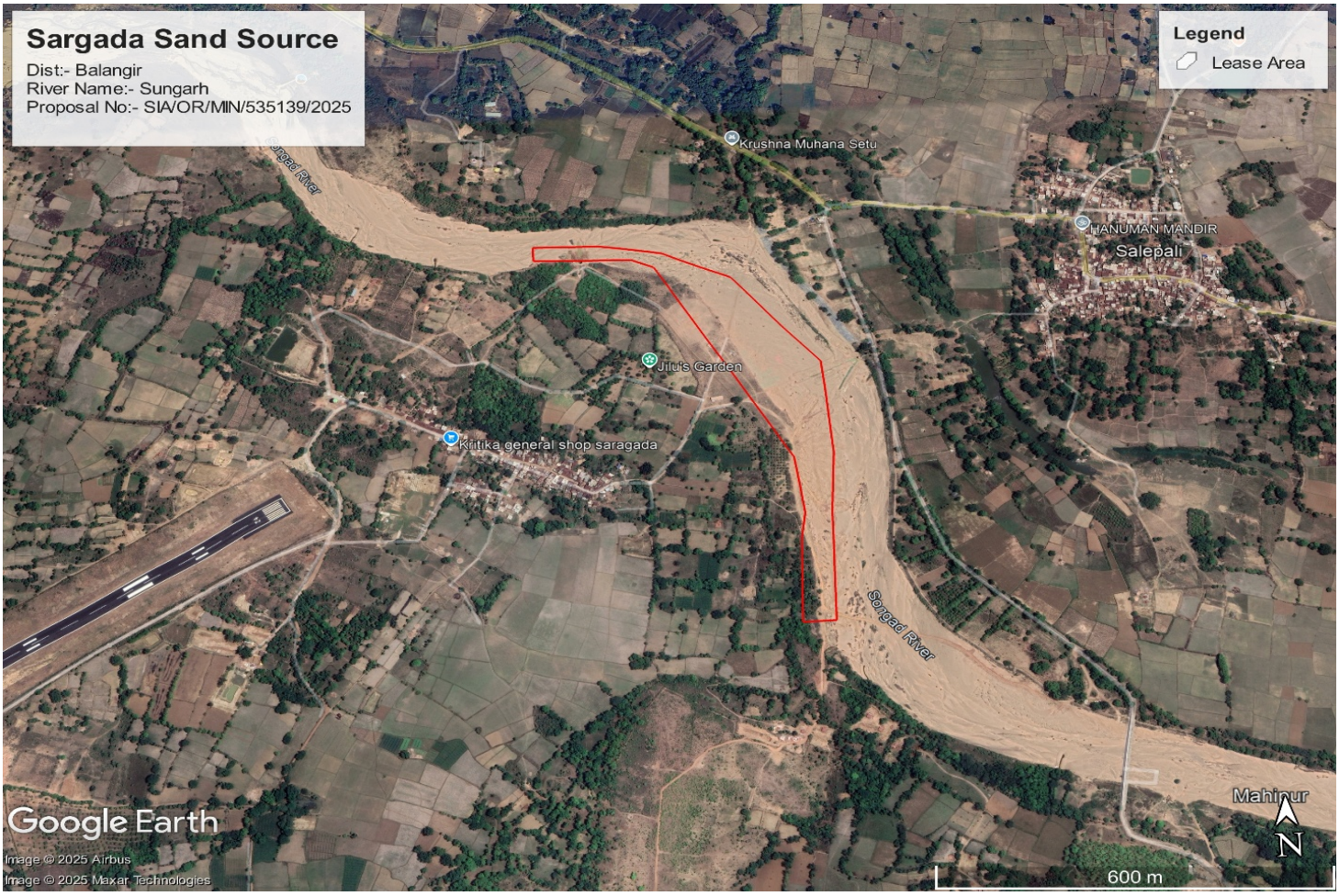
- **Lease Area**: Saragada Sand Quarry, Sungarh River.
- **Geomorphological Setting**: The proposed lease lies **within a curve deposition zone of a meandering river**, indicating an **older stage of fluvial development**.
- **Sediment Dynamics**: Such meander bends are **natural deposition zones** where the river loses velocity on the inner bank, causing **sand accumulation over time**.

Implications

1. **Favourable site**: The **inner curve deposition** provides consistent and sustainable sand replenishment.
2. **Natural advantage**: Being in the **older meander stage**, the Sungarh River here has reduced erosive force but higher depositional tendency, making it a **stable sand bed**.
3. **Mining potential**: With proper management, the site is **suitable for controlled extraction**, as replenishment is naturally high compared to straight channel stretches.

Conclusion

The **Saragada sand quarry** location is a **suitable lease area** for sand mining, owing to its position in a **meander deposition zone** where sand replenishment is naturally favorable.



12.0 Observation on Proposal ID: SIA/OR/MIN/533568/2025

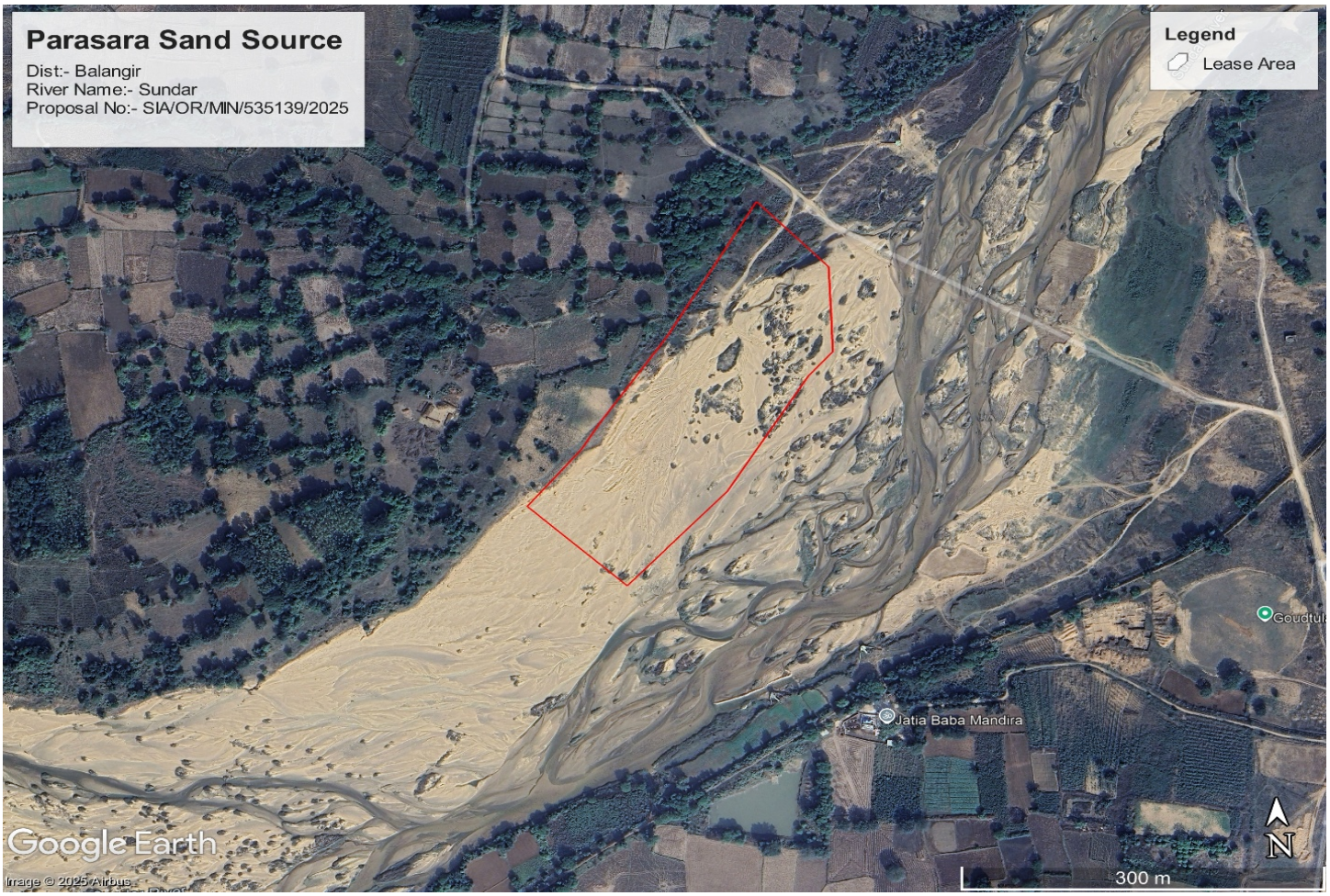
- **Lease Area**: Parasara Sand Bed, Sunder River.
- **Location**: The lease area is **adjacent to the main river stream**, ensuring direct connectivity with active sediment transport.
- **Sand Dynamics**: This positioning makes the site a **favorable deposition zone** where sediments carried during monsoon flows settle effectively.
- **Replenishment**: The **volume of replenishment is high**, indicating that the sand deposit is sustainable under regulated extraction.

Implications

1. **Sustainable resource**: The site benefits from **continuous inflow and deposition of sand**, supporting sustainable mining practices.
2. **Geomorphological advantage**: Being adjacent to the main stream ensures **active replenishment** as opposed to isolated or elevated sand patches.
3. **Suitability for mining**: High replenishment potential makes the Parasara sand bed a **viable and favorable lease area**.

Conclusion

The **Parasara sand bed on the Sunder River** qualifies as a **suitable site for sand mining**, as it is located beside the active river channel and experiences **high natural replenishment**.



13.0 Observation on Proposal ID: SIA/OR/MIN/534881/2025

- **Lease Area**: Amath Sand Bed, Tel River.
- **Geomorphological Setting**: The proposed lease lies **within a curve deposition zone of the meandering Tel River**.
- **Sand Dynamics**: In meander bends, the **inner bank experiences lower flow velocity**, which favors **sediment settling and sand accumulation**.

Implications

1. **High deposition**: The meander curve acts as a **natural trap for sediments**, resulting in consistently **high sand deposition**.
2. **Sustainable replenishment**: Since replenishment is naturally strong in such zones, extraction can be managed **without depleting reserves**, provided mining is regulated.
3. **Favourable lease area**: The geomorphology makes this site **suitable for sand mining**, with a stable supply from annual monsoon flows.

Conclusion

The **Amath Sand Bed on the Tel River** is a **suitable lease area** for sand extraction, as its location within a **meander deposition zone ensures high natural replenishment and sustainable sand availability**.

14.0 Observation on Proposal ID: SIA/OR/MIN/537546/2025

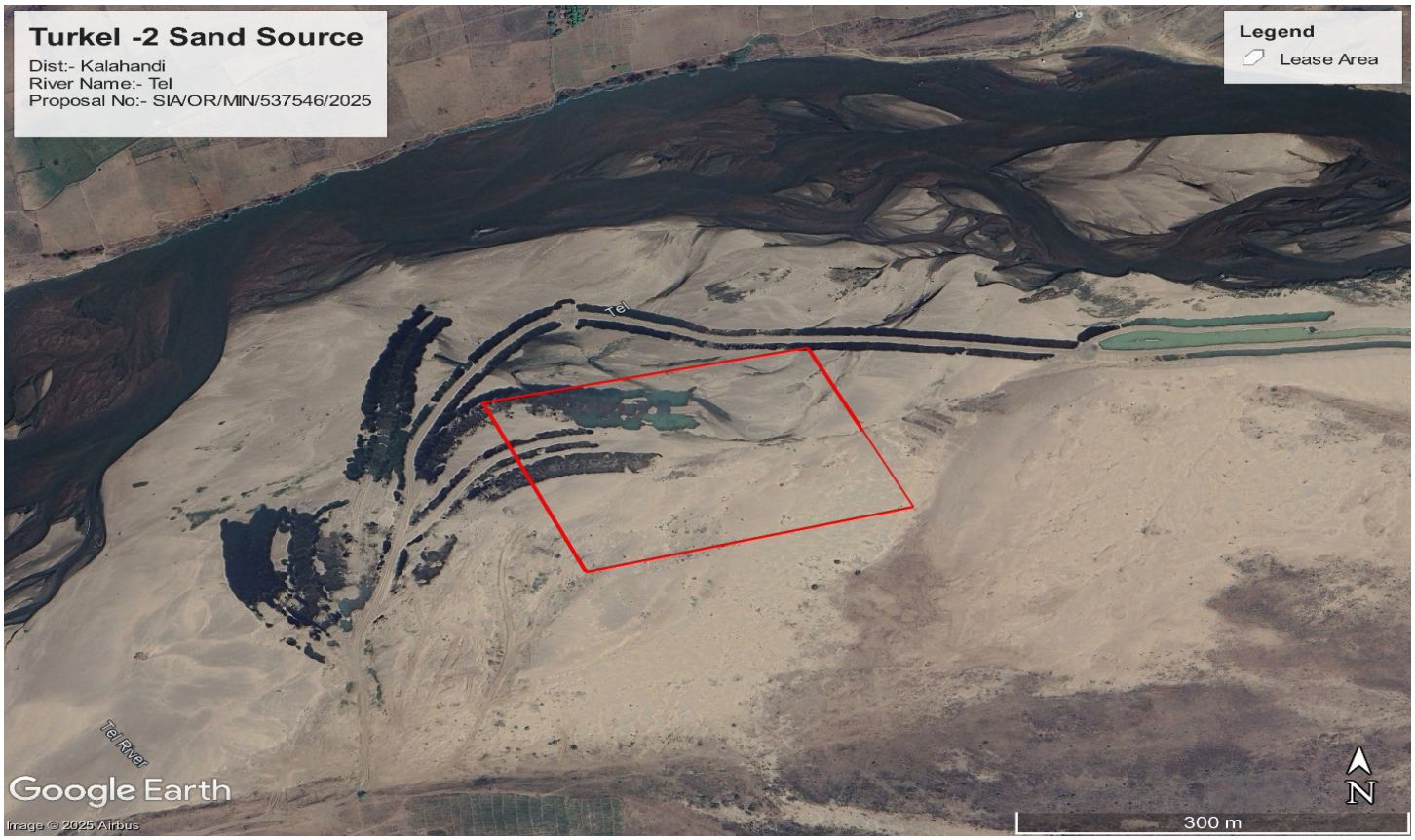
- **Lease Area**: Turkel-2 Sand Quarry, Tel River.
- **Geomorphological Setting**: The proposed sand quarry is located **inside the curve deposition of a meandering reach** of the Tel River.
- **Sediment Dynamics**: Inner meander bends experience **slower water velocity**, creating conditions favourable for **continuous sand deposition**.

Implications

1. **High sand deposition**: The site is a **natural deposition zone**, ensuring abundant sand availability.
2. **Replenishment potential**: Annual floods and seasonal flows contribute to **sustainable replenishment**, making the site viable for extraction.
3. **Favourable lease area**: Due to its geomorphological advantage, the site is **well-suited for sand quarrying**, provided regulated mining practices are followed.

Conclusion

The **Turkel-2 Sand Quarry on the Tel River** is a **suitable lease area for sand mining**, as its position within a **meander deposition zone guarantees high natural sand deposition and replenishment**.



We humbly submit that while **errors did occur**, they were **unintentional and technical in nature**, not willful misrepresentation. We deeply regret the inconvenience caused to SEIAA, Odisha, and assure that such mistakes will not recur in future submissions.

We therefore request the Hon'ble Authority to kindly consider our explanation sympathetically and not to blacklist/debar our firm. We remain committed to ensuring **transparency, professionalism, and strict compliance** with SEIAA guidelines in all our future assignments.

With utmost respect,

Yours faithfully,
With sincere regards,
Yours faithfully,
For Neno Technical Services

(N. Nayak)
Authorized Signatory