

SCRUPITY COMMENTS ON MODIFICATION TO THE APPROVED REVIEW AND UP-DATION OF MINING PLAN OF DHARMAPUR IRON ORE MINE (M.L NO. 2239) OF M/S ZEENATH TRANSPORT COMPANY, OVER AN AREA OF 43.58 HA(AS PER CEC), & 44.28 HA (AS PER THE LEASE DEED). IN RAMGAD VILLAGE, SANDUR TALUK, BALLARI DISTRICT OF KARNATAKA STATE. THE PRESENT MODIFICATION PERIOD IS FROM 2017-18 TO 2019-20, AGAINST THE PREVIOUS APPROVED DOCUMENT PERIOD 2016-17 TO 2019-20, CATEGORY-A (FULLY MECHANISED), RAMGAD RESERVE FOREST -43.58 HA, NON-CAPTIVE MINE.

GENERAL

1. The modification sought in the approved document is not clear and complete, though the modification sought in the previous approved document is almost same in all respect, except change of village road from the northern end of the ML area to the middle of the ML area, to the convenience of the village people and also on the conservation point of view, which must be emphasized.

DETAILS OF APPROVED MINING PLAN

2. Para 3.3: Review in respect of exploration, excavation, reclamations etc. should be furnished up to 30.09.2017. During site inspection it was found that during F.Y. 2016-17 and 2017-18 (so far) lessee had drilled 2 nos. and 6 nos. of core boreholes respectively. In view of above, table-8 may be corrected.
3. Para 3.6: Details of the public road shifting proposals and proceedings may be furnished here. *Copy of the formal order/ notification from the Karnataka State Govt. to the lessee regarding shifting of existing public road may be enclosed.*
4. Implementation status of approved R & R Plan should be discussed at the end of this chapter.

PART-A

5. Para 1.0 (e): Details of boreholes drilled in the ML area to be furnished in a tabular format, mentioning: year of drilling, BH ID, total depth and angle/type of BH.
6. Para 1.0 (i): Nil exploration proposal is not acceptable since during inspection it was found that mineralized area has not been explored under G1 stage of exploration and depth of the BHQ has not established yet. Also exploration by drilling has not been carried out in accordance with the approved proposals mentioned in 'Modification in the approved Mining Plan' approved vide letter no. 279/69/89/BNG dated 08.06.2016. In view of above, exploration proposal may be corrected.
7. Para 1.0 (j): Demarcation of G1 and G2 stages of exploration area in the geological plan and extent (in Ha.) covered by them as mentioned in this para are found to be incorrect.
8. Para 1.0 (k): Utilization of the BHQ may be clarified here in respect of sample feed quality and output quality. Following deficiencies are required to be corrected in reserve and resources estimation (Ref. page 22):
 - a) Lateral extent of the UPL should be restricted from the safety barrier of proposed public road and accordingly reserve of the mine may be re-estimated.
 - b) Section wise reserve and resource estimation should be furnished as per the UNFC codes, mentioned in geological sections.
 - c) UNFC codes demarcations in the geological sections are not correct. In most sections demarcation of UNFC code 122 is incorrect.

- d) No BHQ is encountered in section no. D-D' but BHQ reserve is estimated in this section.
 - e) Depth of the ultimate pit slope should be restricted up to the end of the boreholes in section nos. C-C' and E-E' (i.e. till the extent of proved ore body); below the boreholes run, tentative ore body should be classified under 'Inferred Mineral Resources' (UNFC Cat. 333). In view of above, reserve and resource estimation along those sections may be corrected.
9. Para 1.0 (l): Quality of mined out BHQ may be confirmed in table-12, not matching with the statement mentioned in para 1.0 (k), page 21. Blocked ore quantity due to public road shifting proposals and locations should be discussed in page 23. UNFC category wise reserve and resources should be updated as on 30.09.2017 in table- 13, concurrent mine production may be deducted from the estimated reserve.
 10. Para 4.0 (a): Use of BHQ and proposal of disposal may be discussed here.
 11. Para 2A(a), In the existing and the proposed method of mining operation, it is mentioned that, mechanized method of operations, whereas in the cover page and other places it is indicated as fully mechanized method, hence, the document should be corrected, wherever applicable.
 12. Para 2(b)(II), under re-handling of dumps, it is mentioned, no re-handling of dumps, whether it is for the present or even for the future, there is no clarity, any chance for the re-handling of dumps in the future. If so, the same may be clarified.
 13. Para 4.0(c): Sequence of year wise build up of temporary waste dump and environment protective measures to escape materials from the dump should be furnished in a tabular format.
 14. Para 8.3.5: In summary of year wise proposal for item no. 8.3 table (ref. table no. 41), under 'Management of worked out benches' item head, proposals of rehabilitation by afforestation may be given for the benches below proposed public road.

PART-B

15. Para 10, Plates:

- a) Surface Plan (Plate no. 3): The notations used for active dump, sub grade stack & inactive dumps reveals alike in the general index, which may be attended with different colors. The existing workings limit and the proposed working limits should be highlighted with outline.
- b) Geological Plan (Plate no. 4): Demarcation of G1 and G2 stages of exploration may be corrected in the plan and also in the sections. Lateral extent of the UPL should be restricted from the safety barrier of proposed public road.
- c) Geological Sections (Plate no. 5): UNFC codes may be corrected in the sections. Depth of the UPL should be restricted up to the end of the boreholes in section nos. C-C' and E-E'. Below the proved ore limit, tentative ore body should be classified under UNFC Cat. 333.
- d) Pit Layout Plan for the year 2017-18 (Plate No. 6A): The proposed road should be marked with bold line for easy reference. The direction of advancement of faces may be given with arrow for the year 2017-18. The approach road to the existing workings and to the stack yard and the waste dumps are not updated/ from the present workings. In the light of the above remarks, the remaining two years developments/ pit lay outs may be attended and modified, wherever required.
- e) Conceptual Plan and Sections (Plate no. 9): Proposals under Conceptual Mining Plan and section should be restricted up to 31.03.2020. The position of workings at the end of the lease period/ conceptual period may be brought out showing the workings, waste dumps, stacks and the reclamation and rehabilitation work undertaken at that time.
- f) Reclamation Plan (Plate No.11): The reclamation work undertaken in the ML area/ outside ML area as per the approved R & R document may be brought out, including other protective works within the ML area may be brought out for reference.

16. **Para 11, Annexure:** Following items are required to be annexed with the document:

- a) Copy of the order from the Karnataka State Govt. to the lessee regarding shifting of existing public road.
- b) State Govt. notification copy regarding termination of public right of the earlier existing public road.
- c) Section wise corrected reserve and resources calculation.
- d) Corrected feasibility study report.
- e) Copy of the analysis reports of BHQ and Shale from NABL/ similar accredited laboratory.
- f) Few photographs of mine workings, waste dumps, stacks, afforestation, infrastructure and the recent road diversion from the existing one may be brought out with clarity.
- g) The consent letter/ certificate from the lessee, wherein it is mentioned that the RCOM, IBM, Hyderabad to make further correspondence, should be corrected as IBM, Bangalore.