

**SCRUNITY COMMENTS ON MODIFICATION TO THE APPROVED REVIEW AND UP-DATION OF MINING PLAN OF BBH IRON & MANGANESE ORE MINE (M.L NO. 2346) OF M/S. MINERAL ENTERPRISES LTD., OVER AN AREA OF 102.53 HA., AS PER CEC & AS PER LEASE DEED IS 103.81 HA, IN BEDARABOMMENAHALLI, HIREKANANDAVADI & OTHER VILLAGE, CHITRADURGA TALUK, AND 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), NON-FOREST -NON-CAPTIVE MINE.**

**COVER PAGE**

1. Date of first grant of the ML to be furnished in the cover page. The Modification to the approved Review and updation of Mining Plan including PMCP, under rule 17(3) of MCR, 2016 should be indicated.

**NOTE**

2. All the list of annexures indicated must be indicated with date, ML. No. etc., wherever applicable to avoid confusions & for clarity.

**INTRODUCTION**

3. Modification to the approved review & Up-dation of Mining plan should be written, instead of just approved mining plan. In the light of the above remarks, the whole text and the plates may be attended, wherever applicable.
4. The present modification is sought for changing the location of screening & washing plant, changes in the location of development and production and keeping reserves/ production remains unchanged, and also screens for recovering 5mm materials, which should be specified with clarity for understanding

**GENERAL**

5. Wherever applicant is written need to be changed to lessee.
6. Under the status of the ML areas in table no. 2(6), the information furnished in the table must be given with other relevant information like, the date of surrendered (ML area) to the state to be given to be specific. Besides, the sl. no. 3, the working permission awaited, but the document validity is already expired, which is not reviewed for another five years period/ or not submitted the FMCP for the same.

**DETAILS OF APPROVED SCHEME OF MINING**

7. Para 3.3, under exploration review, the exploration carried out as on 01/10/2017 may be updated, instead of 2016-17 only.

**PART-A**

8. Para 1.0 (e): under the future programme of exploration, the unexplored areas in blocks-2, 3, 4( in part) & 5 and in addition, the waste dumping areas where, complete area has not explored, as it reveals from the bore holes locations. (ii). As per rule 12 (4) of MCDR 2017, the G-1 level exploration should be proposed over the entire potentially mineralized area. (iii). The proposed exploration for the year 2017-18 as trial pits may be replaced with bore holes, to know the ore deposits at depth.
9. Para 1.0 (J): the bulk density of ROM is determined by field test is 2.25 & for OB is 1.70, whereas for float ore is also considered at 2.25 is not appropriate. This should be rechecked.
10. Table No. Geo-(1.12), wherein the table heading gives estimated resources including pre-feasible-block-1, under resources heading, it is expected give only resources related, but here it is given

including reserves is not appropriate, this should be prepared correctly by separating reserves/ resources. (ii). The addition of reserves/ resources given without indicating the period, wherein it is added may be given for clarity/ understanding. (iii). In the below table it is indicated detailed exploration carried out during the current plan period. (iv). Table-1.13, reveals as on 31.12.2016, same as that of table no.1.12, without any change, even after addition of resources/ reserves, the reasons for the same may be justified. In the light of the above remarks, the whole text may be attended.

11. In page-58, under the depletion of reserves, the period indicated as 2017-17 may be corrected, including some spelling mistakes should be attended.
12. In page-60, the bulk density for float ores is taken as 2t/ m<sup>3</sup>, in page-54 it is considered for 2.25t/m<sup>3</sup>, which is contrary, needs to be attended appropriately.
13. Table-no. 1.18, reveals with exploration already carried out in 2015 with metrage drilled, a repeated information on exploration also on reserves/ resources, hence the document must attended properly, by combining all the previous exploration and reserve/ resources as per the last document must be brought out indicating in single table, instead of many tables of very old datas may be avoided. Therefore, the whole text must be revised as per the standard format and revised by deleting unwanted repeated paras and datas in the text, table nos. 1.19 & 1.20 must be reconciled.
14. Para 2A (a), it is expected to describe briefly on the existing and the proposed method of mining operation, instead of just giving commonly together clubbing in general. Under the proposed method of operation, the number of pits and the direction of advancement, number of benches with the bench parameters for understanding. The approach road to the respective working benches, haulage road etc., should be given. (ii). The number benches with bench height and the width along with the slope of bench may be given. (iii). Also, the existing dumps spread parameters, height, slope protective works etc., to be marked.
15. Para 2.0 (c), (in C.1) under proposed production & development for the year 2017-18, the locations indicated for the two pits is not appropriate. Besides, the selection of pits for the development and the production is also not appropriate. (ii). The proposals should be for the year 2017-18 is from the H-H' to S-S', from the southern end of main pit no.1 and the pit no.3 as per the proposals, instead of selecting separate patch working, towards southern end and also on the north western side. Therefore, the proposals may be changed and modified suitably. (iii). In the light of the above remarks, the proposals for the year 2018-19 and 2019-20 may be suitable attended and corrected, wherever applicable.
16. Para 2-C-3, the individual year wise plans and sections should be attended in line with the remarks given above in the relevant paras of the text.
17. Para 2D, the bench parameters given need to be modified suitably, increasing the width of the bench working instead of giving more than 6m height of the bench. Similarly, the ramp and the roads gradient should be specified, instead of giving proper gradient.
18. Para 2E, the proposals described here needs to be attended in line with the scrutiny remarks above paras, for both pit no. 1 & 3 appropriately.
19. Para 2(f), under conceptual mining plan, varies paras need to be checked and attended suitably as per the remarks, given in the above text paras. The exploration and the development production paras also required correction in the text and the plates.
20. Para 2f, table-3.5, the land use pattern for the present and the conceptual given needs to be rechecked and corrected wherever applicable. The old workings and the area under mining must be brought out in the single row, under mining. (ii). similarly, the active dump area and the additional dumping area must be brought out in the same headings. In the above observation the land use pattern table should be attended. (iii). The stacking area for ROM before disposing the ROM through auction also need to be indicated. (iv). In the light of the remarks, the remaining tables on land use pattern may be attended appropriately.

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22. In page-93, the bulk density indicated as 2.25 insitu need to be reassessed, when the same bulk density taken for float ores is not appropriate.
23. Table-no. 3(4), in page-97, may be checked and corrected.
24. Para 5©, wherein it is proposed for crushing & washing process to segregate the lump and fines, how the water requirements will be met is not indicated and how the waste contaminated water will be managed is also not dealt.
25. Para 7(a), the employment potential table should be given as per the standard format.
26. Para 8.6, under financial assurance, table-8.25, The old working & the area under mining should be in the single row, instead of two headings. (ii). The column 4, wherein the extent of the area indicated for different items need to be shown in the sub total. (iii). The extent of the area brought out for reclamation & rehabilitation as 14.00 ha in column no.6 is not correct, it should be brought out under net area in the last column. (iv). The net amount to be re-calculated for 83.35 ha and submitted for the period of the document.

### **PART-B**

27. Surface Plan (Plate No. 2): The workings undertaken during the year 2016-17, lies on the southern side of the main pit are not updated as it exists in the field. (ii). The dynamic stacks created on the northern side and also on the NNE & NNW were not updated accordingly in the surface plan. (iii). The approach roads to the workings during the year 2016-17 also not updated as per the plan exist in the field. (iv). The plant area indicated without bringing out the crusher and the screening plant, which is already in operation.
28. Geological Plan & section (Plate No.3): (i). The ML boundary and the 7.5m safety barrier indicated in the index and the one marked in the plan are different. (ii). Ultimate pit limit is not marked, though in the index it is given notation. The ultimate pit slope is for geological sectional view only and not for ultimate pit. (iii). The stacks created in the ML area on the northern side of the main pit and the other locations are not updated as it is in the plan.
29. Development & Production Plan (Plate no.6A): The existing pit position of workings undertaken during the year 2016-17 and the current year 2017-18 workings are not brought out as exists in the field observed during the field visit. (ii). The proposal drawn for the year 2017-18 reveals with the plan submitted is not matching with the field conditions. (iv). The extent of the area demarcation for the year 2017-18 workings with red color on the south of the main pit and the other location on the NNW is not appropriate, this should be considered from the existing benches from south and can be continued towards western side to achieve the desired production. (v). The proposed location is not accepted, need to be modified in line with the scrutiny comments offered herewith for the remaining periods. (vi). The remaining two years development & production proposals may be attended and modified suitably in line with the comments, wherever applicable. (Plates Nos. 6B & 6C).
- 30. Conceptual Plan & Section (Plate No.8):** The conceptual plan and sections should be attended in line with the remarks given in the above paras. Besides, what would be the position of workings, waste dumps, reclamation and rehabilitations if any that will be undertaken during the closure of the mine or at the end of lease period.
- 31. Annexure:** Following items are required to be annexed with the document:  
In the consent letter, it is expected to mention as Modification to the approved Review & Updation of Mining Plan, under rule 17(3) of MCR, 2016, instead of rule 17(1) of MCR, 2016. Further below para need to be attended appropriately, replacing applicant in to lessee. (ii). Certificate from the QP, the word applicant may be replaced with lessee. (iii). Copy of the 1<sup>st</sup> ML deed need to be specified.
32. Annexures-19 must be placed in the text para itself appropriately instead of annexure side.
33. Copy of valid Bank Guarantee, in accordance with Rule 27(1) of MCDR, 2017, valid till 31.03.2020 may be enclosed.