

Inspection report cum scrutiny Comments on the Modified Mining Plan submitted by M/s Keerthi Industries for it's Sri Sankara Limestone Mine situated in village and Mandal Mellacheruvu, District Suryapeta, Telangana after field inspection dated 10.01.2017.

1. It has been observed during field inspection that the shape of lease sketch submitted along with the document for approval is different from the lease sketch submitted along with the previous document.
2. On being asked about the lease sketch issued with the lease agreement. It was found that the lease was granted on 22.04.1986 for 20 years and later renewal was applied as per then provision of law in 2005 but renewal was never granted. Subsequent to the MMDR amendment 2015 , state DMG has issued the letter that the deemed extension is under consideration and deemed extension will be granted on case to case basis. The lessee therefore has submitted the Modified Mining plan for approval. No order has been reportedly issued by the State Government for the change in lease sketch. related document/orders from the State Govt. may therefore be obtained and submitted.
3. Further the boundary pillars have not been erected at the places submitted in the document under consideration , specifically on the limb common with the forest.
4. The lease sketch submitted along with present document is bears signature of 2011 whereas the previous document was approved in 2006 The lease sketch issued along with the lease deed is the valid sketch for this lease and is also not available.

Scrutiny comments apart from the lease sketch issue are as detailed under:

5. The lessee has submitted the document in the name of Keerthi Industries whereas the last lease agreement is in the name of Suvarna Cement . Clarify.
6. The lease was granted in the two survey nos 874 and 876, but the extent of the land survey wise submitted is also not matching with the previous submissions in the document.
7. Para 1.0(D):In the document , lease period is considered upto 23.04.2036 which need correction and The previous granted period has been submitted as 05.06.2006 which needs to be corrected as 21.04 2006 Regarding the period of lease , the reason for considering the lease period upit may be recorded that

8. "As per the rule position the State Government has not issued any order regarding the period of lease . Further considering the deemed renewal period on 12 th January 2015 i.e, date of commencement of MMDR Amendment, the lease is valid upto to additional 10 year i.e, upto 21.04.2016 and deemed extension may be granted for a period of 50 year from the date of initial grant as per MMDR amendment 2015 subject to the compliance of terms and conditions of lease. Since No adverse order has been issued by the State Government in this regard and according the lease period may be considered upto 21.04 2036 subject to the order issued by the State government in this regard.
9. In the introduction, briefly discuss the installed clinkerisation capacity of plant and the limestone requirement.
10. The break up of the area containing nature of the land may be furnished as under:-

Forest		Non-forest	
(i)Reserves Forest, (ii)Protected forest, (iii)Wild life sanctuary, (iv)Bird sanctuary, (v)others(specify)	Area	(i)Govt. waste land, (ii)Govt. grazing land, (iii)Pvt. Agriculture irrigated land, (iv)Pvt. Agriculture non-irrigated land, (v)Pvt. other land, (vi)others(specify)	Area

11. Review of Mining Plan:

- i. Exploration:
In the previous approved scheme period lessee has undertaken 15 core boreholes against 9 boreholes submitted in the approved geological plan, which needs to be written correctly.
- ii. Exploitation : In the previous proposal side, lessee has submitted future proposal which need to be removed.
- iii. Afforestation: Yearwise review need to be submitted.

- iv. Review be submitted regarding results of monitoring of environmental parameters as well clearly stating whether the monitoring has been done or not and the results thereof were within the permissible limits.
- 12. In para 3.5, the reason for modification need to be justified properly clarifying as why the lease period can be considered upto 21.04.2036.
- 13. The shape of the legitimate lease sketch issued and the shape of lease on all the plates can not be considered to be matching.
- 14. It has been observed from the surface plan that the pit has extended out of the previously defined precise area, whereas in accordance with the precise area plan submitted with this document, the extended area falls inside. Hence clear order of the state government is required.

Geology and exploration

- 15. The surface Plan need to be signed by the certified surveyor. Further all the plans and sections required under these rules shall be maintained up-to-date within three months being a category 'A' mines as per 2ule 27 of MCDR'88.
- 16. The local Geology should be discussed in terms of broad/ mappable lithounits already defined in the lease area . Describe the pay zone fconsiderign the utility of various lithounits.
- 17. The geological mapping needs to be re checked in the eastern portion of the lease in light of the fact that the grey limestone is available in the top portion of the logs seen during inspection.
- 18. The colour of the lithounits need to be co-related with the previous exploration and field data so that the ore body can be delineated properly and correctly.
- 19. The Geological section (HH' to JJ' in the eastern portion of the leae area has not been drawn across the strike, thus failing in delineating the various lithounits in the lease area. Hence needs correction. UNFC codes need to be shown on the Geological sections.
- 20. The UPL need to be marked correctly in plans and sections.
- 21. The previously drilled coreboreholes have not been plotted on plans and sections The DTH hole may be considered as infilling holes for increasing preciseness of the data generated by core holes. It is further added that the completely eaten away boreholes need not be drawn on the plans or sections.
- 22. In para 1.0(B)(d) regarding future exploration , provide the details regarding the phasewise exploration undertaken during the period of lease.
- 23. The reserves need to be reassessed as per MEMC Rules and the weighted average grade also need to be ascertained for Cao and SiO₂ . The resources need to be assessed under G3 and G4 category as well.

24. In the criteria for reserve estimation it has been submitted that the silica content beyond 14.44% is not suitable for clinkerisation . Therefore establish as how the silica content will be maintained in light of the available borehole data.
25. The cut off grade submitted in table 8 is incongruous with submissions on the other pages. The bulk density need to be established on the field tests.
26. The exploration proposal need to be revised to drill infilling coreboreholes in regular grids.
27. Feasibility Axis:
 - i. Under the subhead' Grade controlling/ Blending in Feasibility axis it has been mentioned that no grade control or blending is required which is incorrect and need to be corrected.
 - ii. The Capital cost of the mine need to be submitted.
 - iii. The feasibility report need to be corrected in light of above comments..

Mining

28. The yearwise pitwise, benchwise production be submitted. The benchwise weighted average grade of proposed mining block for each year needs to be furnished and the mechanism for the grade control for optimum utilization of mineral along with blending techniques needs to be furnished. Bench parameters needs to be mentioned in the text.
29. The bench position as on 31.03.2017 be bassessed based on approved production.
30. It has been observed that water is seeping out in second bench of pit-2. Thus lessee is required to get the hydrogeological study undertaken to ensure the make of water and correspondingly ensure the compatible pumping facility.
31. The lessee has given the proposal for diversion of natural drainage which cannot be approved unless the approval of the competent state authorities is obtained. Hence needs to be corrected. The designed bench parameter (height and width) need to be discussed instead of the range thereof and shown accordingly in the plans and sections.
32. As there is no increase in capacity of the plant, as such the increase in production capacity is not justified. Hence be corrected.
33. The pit layout in Eastern part of the lease is not designed correctly. Accordingly corrections are required in text.
34. Extent of mechanization need to be corrected according to the above comments.
35. The statutory staff as per MCDR has neither been appointed nor proposed.

36. Conceptual Plan and section: the tentative pit position and its depth at the end of the lease period based on the reserve need to be submitted. The conceptual status of afforestation has not been proposed as per EC condition.

Progressive Mine Closure Plan

37. The base line data as assessed during the Env. Clearance be submitted in para 8.1

38. The information regarding ground water need to be corrected.

39. Data in table 34, 35 and 33 be corrected in light of the scrutiny comments.

40. All the plans and sections should have certificate by QP 'That the plans and sections are prepared based on the lease map authenticated by the State Government.

41. If due to aforesaid changes, the data in other chapter or plates changes, they may please be done accordingly and ensure the consistency of the data submitted in various chapters of the document.