

**SCRUTINY COMMENTS OF DRAFT FINAL MINE CLOSURE PLAN IN RESPECT OF KURKUTTA LIMESTONE MINE (35.771 ha.) IN VILLAGE KURKUTTA, DISTRICT HAZARIBAGH, STATE JHARKHAND OF M/S SRI DURGA CEMENT CO. LTD. SUBMITTED UNDER RULE- 24(1) OF MINERAL CONSERVATION AND DEVELOPMENT RULES, 2017.**

**TEXT**

(1) i) All the certificates / consents / undertakings and annexures are to be enclosed at the end of the text part.

ii) The undertaking given for maintenance of boundary pillars may be corrected.

iii) Item 3 of the Consent letter /undertaking/certificate from the applicant may be corrected.

(2) During the inspection it was observed that most of the boundary pillars were not maintained properly. The boundary pillars of the mining lease area may be maintained properly as per rule and photographs of some of the pillars may be submitted.

(3) In the copy of the lease deed enclosed as annexure-2, it was observed that the lease was executed for a period from 20 years w.e.f. 17/03/1980 over an extent of 88.41 acres or 35.677 ha but in the land classification given in tabular form in the front cover, the extent of area mentioned as 35.771 ha. The variation in extent of lease area may be corrected in the cover page, introduction, other pages and plans/ sections of the document.

(4) The land schedule enclosed as annexure-3 has not been authenticated by the competent authority of the State Govt. of Jharkhand.

(5) Photographs of the existing quarries have been enclosed as annexure-16 but the quarry numbers are not mentioned in the photographs. Some more photographs of the existing quarries with their location co-ordinates and suitable caption below the relevant photographs, land use of the lease area, environmental status of the area, lease boundary pillars should be enclosed.

**(6) Introduction (Page: 02):**

i) The copy of the approval letter of mining plan under rule 11 of MCDR, 1988 dated 17/03/1993 has not been enclosed. Same may be enclosed.

ii) The annexure numbers of the copy of the approval letter of mining plan under rule 11 of MCDR, 1988 dated 17/03/1993 and scheme of mining dated 10/11/1999 are not mentioned. The period for which the documents were approved should also be mentioned.

iii) The lease was executed on 17/3/1980 for a period of 20 years and expired on 16/3/2000. But the copy of application for renewal of mining lease has not been enclosed along with the document. Same may be enclosed.

(7) (a) The extract of the meeting of the Board of Directors of M/s Sri Durga Cement Company Ltd. held on 14/07/2017 has been attached in the draft FMCP but name of the Board of Directors are missing in the extracts of the meeting.

(b) The copy of Board resolution for declaration of nominated owner as per Mines Act 1952 may be enclosed as annexure.

(c) Introduction (page:02) : It is mentioned that there are 07 (seven) Directors of the company but name of only six Board of Directors furnished in annexure 14.

**(8) Statutory Obligations (Page 07):**

i) Under this item it should also be mentioned that the statutory obligations if any imposed by the Central Government, State Government or any other Authority will be complied with.

ii) The mine was reported production from 2003-04 to 2011-12 without having any approved mining plan/scheme of mining. It was observed from the office record that the mine is under suspension vide

this office letter dated 25/02/2013. The copies of suspension order, violation letter, show-cause notice etc. issued by IBM, Ranchi & their compliance position submitted by the company may be furnished in the following table and copies are to be enclosed as annexure to the FMCP.

Sl. no	Letter reference with type of correspondence like Violation letter / Show cause Notice etc.	Violation of rule/rules pointed out	Reply status
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**(9) Physical & Chemical Characteristics(Page 10):**

It is mentioned that the average grade of Limestone has been considered as below 45% CaO but the analysis report in support of the grade of limestone of the mine has not been submitted along with the document. The limestone sample of the mine should be analysed either through a NABL accredited Laboratory or from a Govt. laboratory and analysis report of the same should be enclosed as annexure in the document. The para may be revised accordingly.

**(10) Reserves (Page no. 10):**

i) Mining plan of Kurkutta limestone mine was approved on 17/3/1993 but mineable reserve of the mine furnished as per mining plan approved vide letter dated 04/10/1993. Same may be corrected.

ii) The scheme of mining of the mine was also approved vide letter no. RAN/HAZ/LSt/MS-26/98-99 dated 10/11/1999 for the period from 1998-99 to 2002-03. There is no valid approved mining plan/scheme of mining from 2003-04 onwards. Hence the reserve / resource should be furnished as per the last approved document i.e, scheme of mining approved vide letter dated 10/11/1999 instead of approved mining plan dated 17/03/1993.

iii) Under depletion of reserve, proved mineable reserve of 63971 tonne given as per mining plan approved 4/10/1993 may be corrected. Up to 31/3/2017, production depleted given as 61732.47 tonne and balance of proved reserve given as 2238.53 tonne. But in page no. 11, under item Balance remaining resources as on 01/04/2016 the balance proved reserve of 2238.53 tonne shown under under 'measured mineral resources (UNFC code 331).

The details furnished under item 2.2 (Reserve) may be corrected and revised accordingly.

**(11) Mineral beneficiation (Page no. 12):**

Under the item it is mentioned as 'Refer para 1.1'. The referred para 1.1 does not contain such information on mineral beneficiation. The mineral beneficiation process practiced in the mine including sorting, sizing & blending etc. should be discussed and may be modified accordingly.

**(12) Review of implementation of mining plan / scheme of mining including PMCP:**

i) Exploration (Page no. 13):

i) Proposal year of mining plan and scheme of mining period may be corrected.

ii) There was proposal of exploration during the approved mining plan period from 1993-94 to 1997-98 and approved scheme period from 1998-99 to 2002-03. There is no valid approved mining plan/scheme of mining for the period from 2003-04 onwards. The reason for not achieving the proposed exploration as per approved mining plan / scheme of mining has been mentioned as non-availability of land. The mine was under operation up to 2011-12. Therefore the details of exploration carried out in the mining lease area in the form of trial pits, trenches & boreholes etc. should be mentioned under this para and same may be marked on the geological plan.

iii) The proposal as per approved scheme of mining 1998-99 to 2002-03 is not furnished as per the approved document. Para needs to be revised.

iv) The name and dimension of all the existing quarries in the lease area should be furnished.

**(13) Mine Development (Page no. 14):**

- i) Proposal year of approved scheme of mining period may be corrected.
- ii) The proposal of mine development as per approved mining plan and approved scheme of mining should be revised.
- iii) There was no valid approved document from 2003-04 onwards and the production of limestone reported up to 2011-12. Mine development during the period from 2003-04 to 2015-16 has not been discussed under this para. The quarry / pit wise developed during the period may be given.

**(14) Production of Limestone (page no. 15):**

i) The Remarks for achieved production during the approved mining plan period, it is mentioned that, “the achieved production of limestone from the mine is on lower side of the proposed production due to increase in the demand of the captive cement plant” is not correct. Same may be corrected.

ii) Proposal year of approved scheme of mining period may be corrected.

iii) The Remarks for achieved production during the approved scheme of mining period, it is mentioned that, “the achieved production of limestone from the mine is on lower side of the proposed production due to increase in the demand of the captive cement plant” is not correct. Same may be corrected.

iv) There is no valid approved mining plan/scheme of mining for the period from 2003-04 onwards. The reason for not submitting the scheme of mining for the aforesaid period should be furnished.

v) The actual status of development of the quarries and production achieved during the approved mining plan period from 1993-94 to 1997-98, approved scheme of mining period from 1998-99 to 2002-03 and 2002-03 onwards indicating their name, dimension & location co-ordinates are not furnished under this item. Details of the quarries developed and production achieved during the above period should be furnished in a tabular form.

vi) The mine was reported production from 2003-04 to 2011-12 without having any approved mining plan/scheme of mining. The copies of violation letter, show-cause notice issued by IBM & their compliance position submitted by the company may be enclosed as annexure to the FMCP.

**(15) Afforestation (Page no. 17):**

i) During the approved mining plan period from 1993-94 to 1997-98, the proposed and actual plantation status has been furnished in tabular form but the location of plantation, extent of area covered under plantation & survival rate of plantation done during the plan period have not been furnished. Details of plantation done should be given by adding more columns in the table.

ii) The heading of the column given for afforestation achieved may be corrected.

iii) The year for proposed afforestation during scheme of mining period may be corrected.

iv) The details of plantation proposed for the period from 1998-99 to 2002-03 and actual status thereof may also be submitted in a tabular form.

iv) There was no valid approved mining plan/scheme of mining from 2003-04 onwards and the mine was under operation up to 2011-12. The actual plantation as on date of discontinuance of mining operation indicating the number of saplings planted, extent of area covered under plantation & survival rate of plantation may be furnished in a tabular form. The reason given for not achieving the target is not acceptable.

**(16) Land reclamation & rehabilitation (Page no. 18):**

i) It mentioned that during the period from 2003-04 to 2015-16, the lessee has reclaimed 0.78 ha area partly but the details of the reclaimed areas are not mentioned. As the mine is under final closure,

the details of the reclamation & rehabilitation work carried out during the above period may be furnished in a tabular form indicating the name of the quarries, area reclaimed, area rehabilitated and location co-ordinates etc. of such reclamation & rehabilitation work undertaken by the lessee.

ii) It is mentioned that the reclaimed area on the completion of Final Mine Closure Plan will be 0.93 ha. The details of the reclaimed area to be undertaken on the completion of Final Mine Closure Plan may be furnished in a tabular form indicating the name of the quarries and area to be reclaimed/rehabilitated and location co-ordinates etc. of such reclamation & rehabilitation work.

**(17) Mined out land (Page no. 19):**

(A) Under the present land use pattern, 4.92 ha area has been furnished as total used area as on 01.04.2016 but the item wise land use pattern for quarry, reclaimed area, dump etc. have not been furnished.

(i) Quarry: An extent of 1.85ha has been degraded by quarry but quarry wise land degraded status has not been specified.

(ii) Reclaimed area: Quarry wise land reclamation status has not been specified.

(iii) Dump: An extent of 1.41 ha has been degraded by waste dump but the number of dumps covered has not been given.

(B) The land use pattern on completion of Final Closure Plan has been furnished as 6.22 ha. but the item wise land use pattern for quarry, reclaimed area, dump etc. have not been furnished.

i) Water Reservoir (Quarry): An extent of 1.70ha of worked out quarry area has been proposed to be converted into water reservoir but the name of the quarries & its extent covered under such water reservoir has not been furnished. The name, number and dimensions of quarries proposed to be converted into water reservoir may be furnished.

(ii) Dump stabilized: An extent of 1.41 ha of waste dump area has been proposed to be stabilized. Number of dumps and dumping area proposed to be stabilized may be furnished.

iii) Green Belt: An extent of 1.30 ha area has been proposed to be covered under green belt. Details of the area proposed to be covered under green belt may be furnished.

**(18) Water quality management (Page no. 19):**

The water analysis report enclosed as annexure-12 has been analysed on 12.03.2004 is very old. A fresh analysis report from a NABL accredited Laboratory along with the certificate of accreditation of the laboratory should be enclosed in the document.

**(19) Waste management (Page no. 20):**

i) Number of existing old dumps available in the ML area, their size, capacity etc. has not been discussed under this item. Details such as size, capacity, and location of such dumps may be furnished. The manner of dump stabilization & rehabilitation/re-handling may also be discussed. The para may be revised accordingly.

ii) Some photographs of the waste dumps giving their location may be enclosed.

**(20) Top soil management (Page no. 20):**

Number of existing topsoil dumps available in the ML area with their size/capacity, location etc. may be furnished. The manner of stabilization of the same may also be given and the para may be revised accordingly. (Para 4.5)

**(21) Safety and Security page no. (22):**

All around fencing of all the quarries proposed to be converted into water reservoir may be furnished mentioning the name of the quarries. The completion of fencing of all water logged pits should be proposed and report of the same should be submitted to this office along with coloured photographs. Accordingly, the para may be revised.

**(22) Time scheduling for Abandonment (Page 24) & Abandonment cost (Page, No, 25:**

Under waste dump management plantation over the dump has been proposed within one year. But proposal for number of dumps to be covered under plantation indicating extent of area to be covered under such plantation and number of saplings to be planted have not been discussed. Accordingly, the para may be revised.

**(23) Financial Assurance (Page no. 26):**

Copy of the Bank guarantee of financial assurance has not been enclosed in the document. The status of old bank guarantee has not been mentioned.

**(24)** There are so many typographical errors in the document. Same are to be corrected.

**PLATES**

**(01)** The CCOM's circular No.2/2010 and its addendum dated 21/09/2011 and 11/06/2014 has not been complied with.

**(02) Plate No. 01 (Key Plan):**

(i) The index reference given for rail track is not matching with the plan.

(ii) The index reference given for road is not matching with the plan. Moreover the road is for village road or for public road has not been mentioned. Places of both end of the roads are also to be mentioned.

(iii) The index reference given for air, noise and water sampling stations are not shown on the plan.

**(03) Plate No.02 (Area Plan):**

i) The mining lease area has not been shown on the authenticated lease plan.

ii) In the list of plates, it is mentioned that Authenticated lease area plan submitted as Plate no. 10 but no such plate is enclosed in the document.

**(04) Plate No. 3 (Surface Plan):**

(i) Surveyor's signature is missing on the surface plan. The plan should be signed by a competent surveyor.

(ii) At least three permanent ground control stations outside the lease area have not been selected and the latitude & longitude of these stations have not been furnished. Besides, these ground control stations need to be linked with the boundary pillars. The plate may be revised accordingly.

iii) A portion of the forest area has been marked as surrendered but the extent of surrendered area is not mentioned in the text. Also no paper in support of surrendered area has been submitted along with the document. The surface plan and the other plans submitted along with the document may be revised accordingly.

**(05) Plate No. 4 (Geological Plan):**

Number of boundary pillars is not marked on the geological plan and also on the other plans submitted along with the document. Same may be mentioned on all the plans including geological plan.

**(06) Plate No. 5 (Environment Plan):**

The exiting features available within 500m radius of the lease area have not been mentioned, which should be marked and the plate may be revised accordingly.