Scrutiny comments on examination of draft Modification of Mininig Plan submitted under rule 17(3) of MCR' 2016 in respect of Naganpur Limestone & Dolomite Mine (M.L.No.2401) of Shri. V.R. Patil over an area of 2.387Ha, situated in Naganpur Village, Mudhol, Taluka, Bagalkot District of Karnataka State for the period 2018-19 to 2022-23.

- 1) General:- i) On the cover page the rule under which PMCP is submitted needs to be corrected as Rule 23 of MCDR 2017. Same should be corrected in all relevant pages. ii) The lease area mentioned on cover page and in text plates are not matching with the lease deed. This needs to be rechecked and corrected.iii) Environment clearance is granted for limestone only. However from the annual returns it is observed that dolomite is also produced along with limestone. How dolomite is produced without having EC needs to be justified. iv) The consent for operation is valid up to 31.03.2018. Consent for operation needs to be obtained before commencing mining operation for the year 2018-19 onwards. v) The mine code mentioned at page no-2 is incorrect this needs to be corrected. vi) Land details given in the table at page no-3 and 4 are needs to be rechecked and corrected. The land details are not matching with the RTC form enclosed as annexure-VI. vii) During field visit it is observed that boundary pillars are no erected as per section. Boundary pillars should be erected as per the specification and photographs of the same should be enclosed. viii) The justification given for less production and development is not acceptable. Further at page no 7 it is stated that there was a proposal for restoration of 7.5mtr safety zone. However in the approved document there was no such proposal for restoration of safety zone. Why backfilling is done in 7.5mtr safety zone without having any proposal in the approved document needs to be discussed. ix) Violation letter dated 05.06.2014 is not legible and letter of suspension is not enclosed. x) Reason for modification is not properly discussed.
- 2) Geology and exploration:- i) The highest and lowest elevations of the lease area are needs to be discussed under topography of the lease area. And RL's mentioned under drainage pattern are incorrect. Ii) Under details of samples analysis number of core samples, pit samples, trench samples etc., analyzed so far needs to be discussed. iii) Rule under which plans and sections are prepared need to be discussed properly. iv) Bore hole data is not properly projected on cross sections. In some of the cross sections it is observed that some quantity is estimated under limestone even though Cao% is less than 35% and some quantity under dolomite where mgo% is less than 15. Reserves/resources need to be re-estimated by properly projecting borehole data. v) Reserves which are blocking in 7.5mtr safety zone cannot be estimated under 111 and 121 category without having valid common boundary permission. vi) Compare to total lease area, area already worked and proved depth the reserves estimated are appears more. This needs to be rechecked.
- 3) **Mining:-** i)The present method of mining is not properly discussed. During field visit it was observed that benches were not maintained as per the proposal and high walls were

formed. However in the text it is mentioned that bench height maintained at 3-5mtr. ii) In the first year proposal should be given for rectification of the benches only. iii) Rectification of the benches and achievement of proposed handling may not be possible by manual method. So method of working should be given by Other Than Fully Mechanized. iv) In some portion working has been carried out in 7.5mtr safety zone also and same is not shown on plans. So survey should be properly done and planning should be made on updated plans and sections. v) Only reserves should be taken for proposed quantum for next five year block periods up to life of the mine. vi) At page number 33 and 34 it is mentioned that about 0.05ha and 0.01ha area in the safety zone will be restored in the year 2018-19 and 2019-20. How working has been carried out in the 7.5mtr safety zone without having any proposal in the approved document needs to be discussed. Whether any permission is taken from concerned authorities for working in 7.5 mtr safety zone and any permission is taken for restoration needs to justified.

## Plans:-

- 4) **Surface Plan:-** i) The surface plan needs to be updated based on the latest survey. During inspection it is observed that bench positions and workings are not matching.
- 5) **Geological plan and cross sections:-** i) UNFC codes on cross sections needs to be changed based on re-estimation of reserves/resources as per the scrutiny comment given in the geology and exploration chapter.
- 6) **Production and development Plans and sections:-** i) Year wise proposal should be modified based on the scrutiny comments given in the mining chapter. ii) Proposed RLs should be mentioned on sections.