

Scrutiny Comments on Review of Mining Plan with PMCP for Devannagoundanur Limestone Mine over an extent of 3.45.5 hectares in Devannagoundanur- Village Sankari -Taluk and Salem-District, Tamil Nadu State of M/s. J Mohan kumar. Mine code-38TMN11069(Date of MCDR Inspection-29/01/2019).

1. (General: Status of EC permission and the quantity of yearly production sought/granted need to be discussed in introduction.
2. Introduction: Communication received from state government as per MMDR Amendment Act-2015 ,regarding extension of ML up to 50 years from grant of ML if any received should be discussed.
3. Para 2.0(b):Type of lease area whether, patta or poramboke land should be indicated.
4. Page-5- para3.3(i)- it has been mentioned that there are three pits with maximum depth of 33 meter and other pits are 5 meter depth and the drilling made during the previous plan was in deepest excavated portion but the depth of deposit assumed upto 45 meter all through the lease area which is not correct, hence it should be corrected.  
Period of exploration carried out during 2018-19 should be indicated under all the respective para's. Depth and Width of existing pits range should be indicated as it is not uniform under the sub para(ii) and the other concerned para's should be corrected. The quacity of waste dump located out side ML should be discussed under the para.
5. Para 3.3(iii): Production details furnished for the period from 2014-15 to 2106-17 under the table no.9,should be verified with the MR/AR submitted by lessee as the details are not tallying with office records. Reasons and justification for excess production need to be discussed under the para.  
Part-A
6. Para.1(b):Parameters of Limestone band-II indicated under para is incorrect as it is not proved with adequate exploration, hence the dimentions of the band should be omitted. Scale of the plan prepared need to be indicated under the para 1(iv)(f).
7. Page-11 para(i)- It has been mentioned that there is no programme of future prospecting, but the southern portion of the lease has not been explored properly, hence proper proposal of exploration in southern side of lease is to be given as per UNFC norm.
8. Page-11 para(j)-the reserve and resource has not been calculated properly and over- estimated without drilling in southern side of the lease. which was explained during the field visit on 29/01/2019, hence the reserve and resource must be recalculated properly.
9. Reserve and resource assessed as per the table no.17 should be reassessed as the limestone considered on south east area i.e. cross section E-F area was taken more ,as per the field observation, the available limestone width is about 25m to 20m in the RL 318-RL333area. Further,the resource with (221)UNFC code on southern part of ML, covering pit nos.2,3&4 is incorrect as the area is not proved with exploration data. Reserve and resource assessed beyond pitno.1,should be excluded and reserve and resource should be re-calculated. No details of occurrence of low grade limestone furnished as per the text or geological plan and sections. Exploration programme need to be proposed on southern part of ML under future exploration.
10. Page-11 para(j)-Table-17- the waste calculated is also not properly done hence it should be recalculated.
11. Page-12- table-19to 23- Reassessed Mineral Reserves and Resources as per UNFC System as on 30.11.2018 is not correct as the drilling in the southern side in not made hence only the pit in the north side should be taken in this ROMP and the reserve and resources after proper exploration in southern side should be included in future ROMP. Hence the table should be modified accordingly.
12. Page- Para(l)- the resource table as per UNFC should be changed accordingly wherever required.
13. Para 2.0(a):Proposedyearwise production &development for the year 2023-24 as per table no.26 is not seen in the concerned plan no.Vor V-A.
14. Page-21- table-33/ table 46 in page-30 and table-60 in page-39- the table is not showing the requirement of land for mining/roads/infrastructure etc, then how the mining will advance towards southern side and excavation will be carried out . further the table should also show the area considered as reclaimed and rehabilitated and net area considered for F.A - it should be corrected.
15. Page-22-para9(ii)- recovery of ROM should be changed based on earlier scrutiny comments.

16. Page-23-para(Geological plans and sections)-The ultimate pit dimensions will be as under in Table-35 should be limited to pit 1 only as prospecting has not been completed and reserve has not been established.
17. Page-23(iii) Disposal of waste- should be recalculated and tabled accordingly based on earlier scrutiny points.
18. Page-25-para(iii)- waste generation should be recalculated and tabled accordingly based on earlier scrutiny points.
19. Page-26- table-41 – DMF should be included in the cost and table should be corrected.
20. Para 5.0: Physical & chemical of properties of low grade limestone should be discussed under the para.
21. Para 6.0: Other than hand sorting method is adopted for upgradation of mineral should be discussed under the para
22. Para 8.2: No provision for dust suppression made though more than three times of production is proposed during the ensuing period of the document.
23. Page-31- para 8.3.1. Mined-Out Land- should be given after recalculating as per scrutiny point no-7.
24. Table-47 to 58- "nil " table for Reclamation and rehabilitation is not acceptable and hence it should be properly fill in each column with adequate plantation all along the boundary of the lease area.  
All chapters of PMCP, feasibility report, UNFC report should be reconciled as per scrutiny for the paras of ROMP

- Plates:-1) plate-IV-A- the reserve calculated is without proper drilling in the southern side hence it should be changed. The colour code taken is not proper and not matching with the index.
- 2) Plate no.IV-A,B: Limestone considered as resource with (221)UNFC code is incorrect. Limestone shown beyond pit no.1, on southern part of ML should be excluded as the area is not proved with exploration. Reserve and resource quantity assessed with colour code should be furnished on geological plan.
  - 3) Plate no.V: As per the guidelines individual year wise development and production plans & sections need to be prepared instead of combined plan as document is submitted with A-OTFM category.
  - 4) plate-V-A- separate year-wise development and production plan and year-wise cross-section with cumulative year-wise development and production plan and cumulative year-wise cross-section should be given for A category mines.
  - 5) plate-III- the earlier dump which has been made long back should be surveyed and shown in the plate with RL. the quantity should be given in text.
  - 6) plate-VI & VII- the dump RL should be marked.
  - 7) Plate- IX- In conceptual plan all along the lease boundary plantation should be shown.
  - 8) Plate-VIII – only trees should be mentioned as the shrub's are bushy growth which cannot be taken in rehabilitation. Names of adjacent mines situated either sides to mine should be marked on plan.

Annexures :-

- 1) Annexure-1 should be changed as per the reserve recalculated.
- 2) Annexure-1B- latest photographs of mine should be given. Photographs of boundary pillars as per CCOM circular should be shown.
- 3) all calculation should be provided in Excel sheet in CD.

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