

Annexure

Scrutiny comments on draft Review of Mining Plan & PMCP for Punganthuraimagnesite mine over 3.635 hect in Punganthurai village Dharapuram taluk of Salem district Owned by Smt Baladevi submitted under rule 17(1) of MCR, 2016 & rule 23 of MCDR-2017 for the period from 2019 -20 to 2023-24. Mine code 39 TMN27001.

General: Status of EC permission and the quantity of yearly production sought/granted need to be discussed in introduction.

1. 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.

2. Para 2.0(b): Type of lease area whether, patta or poramboke land should be indicated.

3. Para 3.3(i): Period of exploration carried out during 2018-19 in should be indicated under all the respective para's. Table no.10 should also furnish the ROM & waste proposed and generated during the period under the para. Width of existing pits shown more than actual under mine development and other concerned para's should be corrected.

4. Para-3, Page-6:- It has been mentioned that "The recovery percentage of mineral was estimated as 44% (i.e. Magnesite @ 4% and Dunite @ 40%) during the previous approved scheme period. But during the course of mining operation the recovery percentage of Dunite was enhanced to 50%- during inspection it has been observed that the % of Dunite was more in eastern pit whereas other pits were very less dunite hence the earlier recovery should be taken for reserve calculation.

5. Para 3.3(iii):- Production details furnished for the year 2106-17 should be verified with the MR/AR submitted by lessee as the details are not tallying.

6. Page-7, Table-11:- Reserves estimated in the earlier approved scheme period [2014-15 to 2018-19] is not correct as per percentage taken it should be rechecked and correct figure should be given.

7. Page-7- Depletion of Reserves: The insitu reserve depleted during the previous approved scheme period [2014-15 to 2018-19]. It is mentioned that the %age of recovery is 44 % but it is mentioned that it is 54 % .hence it should be checked and corrected.

8. Para 3.4: The statement under the para is incorrect, violation has already been communicated by IBM on 16.1.2018.

Part-A

9. Para.1(f): Scale of the plan prepared need to be indicated. Few bore holes should be proposed under future exploration programme under sub para (i), to know the quality of magnesite and dunite occurring in southern side of ML as the minerals in the area are not exploited so far. The quantity of Magnesite, Dunite and waste indicated under the table no.20, the reassessed reserves are incorrect should be verified and corrected in all the concerned para's. Qty of waste assessed, indicated wrongly as mined waste should be corrected.

10. Page-12- Reassessed Mineral Reserves and Resources as per UNFC System as on 25.10.2018- the reserve and resources should be recalculated based on the UNFC classification of ore in vein type of deposit. Accordingly, the table-20 should be changed.

11. Page-13 to 17- all tables from 21-24 should be recalculated as per UNFC classification.

12. Page-19- the proposed development and production should be redrawn based

- on the reserve recalculation as per scrutiny comments no-1 and 4.
13. Para 2.0(b): Quantity of yearwise development may be rescheduled and reduced in-order to reduce the pollution levels and to handle huge generation proposed waste. Further, OMS calculated was more than 10 tonnes per head, which is too high. Hence, employment of more labour /reduction in development & production is needed.
14. Page-23- para-ii- the recovery should be recalculated.
15. Para 4.0: Waste consists of what type of rocks/material should be discussed under the para.
16. Para 5.0: Physical properties of dunite mineral should be discussed under the para.
17. Page-28-29- Employment potential- the face OMS is coming out to be 17.8 MT which is very high taking the % age of ore recovery, hence it should be recalculated, and correct figure should be given.
18. Para 8.2: No provision for dust suppression is made though more area with 70,000 tonnes per year is proposed during the ensuing period of the document.
19. Page-33- para-8.3.3 Tailings Dam Management- comes into picture as the mines is situated in the high area and water pit/ sump should be made in order to avoid the mine water going out in rainy seasons.
20. Page-34 to 37 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.
21. All chapters of PMCP, feasibility report, UNFC report should be reconciled as per scrutiny for the paras of ROMP.
- Annexures:-
22. Annexure-1- Reserve in feasibility report should be re-calculated.
23. Annexure-1B- latest photographs of mine should be given. Photographs of boundary pillars as per CCOM circular should be shown.
24. All calculation should be provided in Excel sheet in CD.
- Plates:
25. Plate no. III: Status of development of pit shown more than its actual observed during the inspection ,therefore, pit-II&III should be corrected accordingly.
26. Plate no. IV-A,B: Different Colours for bore holes made may be used for easy identification.
27. 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.
28. Plate-V- 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.
29. Plate-VI- In conceptual plan all along the lease boundary plantation should be shown.
30. Plate-VII- the name of the plate should be Financial assurance plan.
31. Plate-VIII – only trees should be mentioned as the shrub's are bushy growth which cannot be taken in rehabilitation.

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