

SCRUNITY COMMENTS ON REVIEW AND UPDATION OF MINING PLAN IN RESPECT OF ITTIGEHALLI LIMESTONE ORE MINE, M/S LAKSHMI CEMENT & CERAMICS INDUSTRIES LTD., ML NO. 2472, AREA 20.23 HA., SITUATED NEAR ITTIGEHALLI VILLAGE, HOSADURGA TALUK, CHITRADURGA DISTRICT OF KARNATAKA STATE, NON FOREST LAND, OPEN CAST MINE, A(FM-FULLY MECHANIZED MINE). FOR THE PERIOD 2018-19 TO 2022-23.

COVER PAGE

1. Name and period of the document should be corrected as 'Review and Updation of Mining Plan' and 'from 2018-19 to 2022-23' respectively.
2. Rule of submission to be mentioned as 17(1) of MCR, 2016. Address of the lessee may be removed from the cover page.
3. Lease expiry should be written as 17.01.2023 (as per ML deed) and up to 17.01.2033 as per the M M (D&R) Amendment Act, 2015. Educational qualification of the QP to be mentioned in the cover page.

GENERAL

4. It is mentioned on the document that lease first granted to Shri B. Ramaswamy on 18.01.1983 and subsequently ML transferred to M/s Lokhandwala Cement Pvt. Ltd. (date of transfer is not mentioned) and again from M/s Lokhandwala Cement Pvt. Ltd. to the incumbent lessee on 03.05.2003. Details and copy the lease transfer deeds are not enclosed with the document. Copy of the lease deed for first grant also to be enclosed with the document.
5. Status of other statutory clearances like EC and FC, specific orders / guidelines or notifications received from DMG, Govt. of Karnataka and other regulatory bodies time to time pertaining to this ML may be discussed in this chapter briefly with supporting documentary evidences. Reason for non-working of the mine should be mentioned.
6. Name of the document should be corrected as 'Review and Updation of Mining Plan' in all relevant places of the document.
7. Annexure-III, referred to approval of the document for the period from 2012-13 to 2017-18, which is not enclosed in the annexure. Even, the said document is not approved for the said period, which must be explained, how false information is furnished in this text may be explained.

LOCATION AND ACCESSIBILITY

8. Para 2.0 (c): It is to be clarified in this para whether boundary pillars have been surveyed by the DGPS survey or not. Photographs of the boundary pillars are to be enclosed with the document.

DETAILS OF APPROVED SCHEME OF MINING

9. Para 3.1: Period of last approved Scheme of Mining was from F.Y. 2008-09 to 2012-13. Subsequent Scheme of Mining for the period from 2013-14 to 2017-18 is not submitted by the lessee. Reason for non submission of the document may be furnished here.
10. Para 3.3: All reviews in respect of excavation, reclamation etc., review positions may be given from F.Y. 2008-09 to 2012-13 (Proposal vs. Actual) and also for the period from 2013-14 to 2017-18 in two separate tables. Reason for non-working of the mine should be mentioned.
11. Para 3.6: This para is not applicable for the present document.

PART-A

12. Para 1.0 (e) (i): Dimension of the existing pit in the ML area as furnished in page 11 is not tallying with the surface plan, may be corrected w.r.t. latest surface plan. Copy of the borehole logs to be enclosed.

13. Para 1.0 (e) (iii): It is to be clarified here whether at least 10% of core borehole samples have been analyzed from NABL or similar accredited laboratory or not. Copy of the NABL accreditation of the laboratory with chemical analysis report of limestone to be enclosed with the document.
14. Para 1.0 (i): As evident from the site inspection and from the geological plan that southern side of the ML area has not been explored by boreholes.
It is to be noted that entire potential mineralized area within the lease should be explored by detailed exploration (G1 stage) within a period of five years from the date of opening of the mine after execution in accordance with Rule 12(3) of MCDR, 2017. In view of that, a future exploration proposal is required to be corrected.
15. Para 1.0 (j): Reserve of Limestone should be estimated up to the depth of borehole only. Consideration of bulk density and recovery of limestone should be duly justified here.
16. Para 1.0 (k): It is also observed that ultimate pit slope in geological sections is considered as high as 60° to accommodate more reserve within the UPL limit. But, in conceptual mine planning bench height and width are proposed to be maintained at 5m and more than 5 m respectively, with overall pit slope of $<45^{\circ}$. Hence, in all Geological sections, UPL is required to be corrected and accordingly reserve of the deposit should be re-estimated.
Section wise reserve and resource calculations should be furnished as per UNFC codes, not as per stages of exploration (ref. page 18).
17. Para 1.0 (l): Date of estimation of category-wise reserve and resources should be updated as on 31.03.2018, in the light of the above remarks, other related paras if any may be attended.
18. Para 2A (a), the existing mining operation is not explained which ought to have been. Besides, indicating four pits, but information given for single pit only, which must be clarified. Even in the surface plan, there is no demarcation of pits for four or even for one. In the development plan, proposals are drawn for single pit only, if it is so, how the four pit has been indicated may be corrected.
19. Para 2.0 (b): Year-wise tentative excavation quantity of limestone during 2018-19 to 2022-23 should be corrected in accordance with re-estimation of reserve as per UNFC. Total 2.8 million tonnes of limestone is proposed for production during 2018-19 to 2022-23, the same production should be substantiated by adequate reserve.
20. Para 4.0(c): Nos. of dump present in the ML area with extent and height may be furnished in this para in a tabular form. Sequence of year wise build up of waste dump and environment protective measures viz. construction of retaining wall, garland drain, silt settling tank etc. to prevent escape materials from the 'waste dump' should be furnished in this para in a tabular format.
21. Para 8.6: In financial assurance table, 'area pit on use at the start of the plan' should tally with the total ML area granted, extent of unused virgin land (in Ha.) is not mentioned in the table. Copy of the valid bank guarantee, valid upto 31.03.2023 should be enclosed with the document.

PART- B

22. Para 10, Plates:

- a) Key Plan (Plate no.1): Villages name, contours and other features are not legible; nearby ML areas are required to be demarcated in this plan.
- b) Surface Plan (Plate no. 3): This plan should be duly signed by the surveyor. Positions of mining benches and pit positions are not updated in the plan. What is written in the text and shown in the plate must match without any difference.

- c) Geological Plan (Plate no.4): Dolomite band and levels of exploration (viz. G1, G2 or G3) as per UNFC are not marked in the plan. Proposed borehole locations should be shown in the plan. Southern side of the ML area is remained un-explored.
 - d) Geological Sections (Plate no. 5): UPL should be drawn in harmony with the proposed slope of conceptual mine planning, accordingly reserve and resources of the deposit should be re-estimated. Proposed boreholes to be shown in the sections.
 - e) Development & Production Plan & sections(Plate No. 6A- 2018-19): The plan prepared for the year reveals that the workings drawn without any approach road from the top to bottom of the working faces, which ought to have been and should be drawn for the waste dump and the stacking places to be appropriate. In the light of the above remarks, the remaining years development and the production plan and sections should be attended appropriately.
 - f) Environment Plan (Plate no. 8): Proposed environment monitoring stations are to be marked in core and buffer zone. Various types of proposed environment protective measures viz. afforestation, retaining wall, check dams, gully plugs and other measures required in this terrain are not shown at appropriate places.
23. **Para 11, Annexure:** Avoid any type of stamping in the annexure, following items are required to be annexed with the document: The annexures indicated in the table and the one submitted is not matching. The annexures are numbered very casually without following the order. Some of the annexures are not tallying with the tables given. Care should be given to furnish the relevant annexures without any ambiguity. ID proof of the nominated owner is not legible.
- a) Copy of the ML deed extension letter from Govt. of Karnataka as per the M M (D&R) Act, 2015.
 - b) Copy of the mining lease deed for first grant dated 18.01.1983.
 - c) Copy the lease transfer deeds.
 - d) Copy of the certificate of incorporation of “M/s Lakshmi Cement and Ceramics Industries Ltd” as a company.
 - e) List of board of directors with address and contact nos.
 - f) Copy of the recent resolution of board of directors indicating nominated owner for the company, duly signed by the company secretary.
 - g) Corrected detailed section-wise calculation of reserve and resources of the deposit.
 - h) Copy of the NABL accreditation of the laboratory with chemical analysis report of limestone (obtained from the boreholes).
 - i) Copy of the drilled borehole logs (12 nos.).
 - j) Few photographs of mine pit, waste dumps and boundary pillars and infrastructure if any may be appended.
 - k) Copy of valid Bank Guarantee, valid up to 31.03.2023.
 - l) Three ground control points away from the ML area and connected to any one boundary pillar with RL and the bearings of the same should be enclosed in color photographs.