

SCRUNITY COMMENTS ON OF REVIEW AND UPDATION OF MINING PLAN IN RESPECT OF ITTIGEHALLI LIMESTONE MINE OF M/S MYSORE HOUSING COMPANY PVT.LTD., M.L NO. 2473, AREA 80.94 HA., SITUATED NEAR ITTIGEHALLI VILLAGE, HOSADURGA TALUK, CHITRADURGA DISTRICT OF KARNATAKA STATE, IN NON-FOREST LAND, FOR THE YEAR 2018-19 TO 2022-23. A(FM-FULLY MECHANIZED OPEN CAST MINE).

COVER PAGE

1. Rule of submission of Progressive Mine Closure Plan may be corrected.
2. Address of the lessee may be removed from the cover page.Mine code is not mentioned.
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.
4. Educational qualification of the QP to be mentioned in the cover page.

GENERAL

5. It is mentioned on the document that lease first granted under ML no. 1862 to Shri B. Ramaswamy on 18.01.1983 and subsequently ML transferred to M/s Mysore Housing Co. Pvt. Ltd. (date of transfer is not mentioned). Details and copy the lease transfer deed is not enclosed with the document. Copy of the lease deed for first grant also to be enclosed with the document.
6. 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.
7. The reason for non-operational and non-submission of the document for the period from 2012-13 onwards and not dealt in the present submission is not appropriate, which need to be brought out with clarity in the present submission without any ambiguity.

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 was 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.

PART-A

11. 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. Copy of the borehole logs of 20 nos. of holes to be enclosed.
12. Para 1.0 (i): Proposal of no future exploration is not acceptable. During site inspection it is observed that southern continuation of main limestone band is not explored by the lessee. Similarly, north eastern side of the limestone band also has not been explored.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.

13. 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.
14. Para 1.0 (k): Section wise reserve and resource calculations should be furnished as per UNFC codes mentioned in the geological sections, not as per stages of exploration (ref. page 19). Recovery of limestone is considered only 60%, please clarify. Associated grades of MgO% and SiO₂ % within limestone are not discussed.
15. Para 1.0 (l): Date of estimation of category-wise reserve and resources should be updated as on 31/3/2018.
16. 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.
17. 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 codes. 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.
Recovery% of ROM is not included in the year-wise production proposal table (ref. page 24).
18. Para 2.0(f): Proposed handling of ore and waste during 2018-19 to 2022-23 as furnished in the table nos. 23, 24 and 25 are not tallying with the main year-wise production proposal table (ref. page 24).
19. 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.
20. 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

21. Para 10, Plates:

- a) Key Plan (Plate no.1): 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, pit positions, mineral stacks and dumps are not updated in the plan. Coordinates of all boundary pillars should be mentioned in the plan. Date of survey is written as 31/12/2018, which shows that the document have been prepared in a casual way. Care should be taken to avoid such anomalies.
- c) Geological Plan (Plate no.4): Proposed borehole locations should be shown in the plan. Southern and north eastern portion of the main limestone band is remained un-explored.
- d) 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, though partly shown, 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 year's development and the production plan and sections should be attended appropriately.

- e) Development & Production Plan & sections (Plate No. 7- 2018-19 to 2022-23): The sections drawn to show the five years workings, but the pits worked during the period is not indicated in the sections, without which it is not complete for understanding. The mine comes under A(FM), individual year wise development sections should be prepared and submitted.
 - f) Environment Plan (Plate no. 8): 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 in this plan. Few water monitoring stations should be proposed along the seasonal nallas originating from this lease.
 - g) Conceptual Plan & sections(Plate No.9): Though the plan and sections drawn must be brought out with clarity, the extent of the area undergoes for back filling, i.e. reclamation and rehabilitation during the conceptual stage must be shown accordingly or brought out, either back filling with water or with waste of the mine may be dealt.
22. **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 of the lease transfer deed to M/s Mysore Housing Co. Pvt. Ltd.
 - d) Copy of the certificate of incorporation of "M/s Mysore Housing Co. Pvt. Ltd" as a company.
 - e) List of incumbent board of directors with address and contact nos.
 - f) Corrected detailed section-wise calculation of reserve and resources of the deposit.
 - g) Copy of the NABL accreditation of the laboratory with chemical analysis report of limestone (obtained from drilled boreholes).
 - h) Copy of complete drilled borehole logs (20 nos.).
 - i) Few photographs of mine pit, waste dumps and boundary pillars.
 - j) Copy of valid Bank Guarantee, valid up to 31.03.2023.
 - k) 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.