

SCRUNITY COMMENTS ON REVIEW AND UPDATION OF MINING PLAN OF ITTIGEHALLI MANGANESE & LIMSTONE ORE MINE, M/S LAKSHMI CEMENT & CERAMICS INDUSTRIES LTD., OVER AREA OF 242.80HA..IN ITTIGEHALLI VILLAGE, HOSADURGA TALUK, CHITRADURGA DISTRICT OF KARNATAKA STATE

PREFACE

1. ML No. 2260 was granted to M/s Lakshmi Cement and Ceramics Industries Ltd. on 10.02.2000 with a period co-terminus with ML no. 1667 ending on 23.05.2000 and in the ML deed it is mentioned clearly that lease is granted only for Manganese ore not for Limestone. Hence the entire document of Review of Mining Plan should be prepared only for Manganese ore. Accordingly reserve, production proposals and other relevant details should be given only for manganese.
2. It is mentioned on the document that lease first granted to Shri B. Ramaswamy on 24.05.1980 and subsequently ML transferred to M/s Lokhandwala Cements Industries Ltd. on 21.04.1986 and again from M/s Lokhandwala Cements Industries Ltd. to the incumbent lessee on 03.05.1993. Details and copy the lease transfer deeds are not enclosed with the document.
3. Mining lease is not found to be explored by any boreholes, estimation of reserve and resources are not found to be carried out in accordance with UNFC norm and as per the Evidence of Mineral Content Rules 2015. Total 675,292 tonnes of manganese ore is proposed for production during 2018-19 to 2022-23, the same production should be substantiated by adequate available reserve.

COVER PAGE

4. Name of the document to be corrected as 'Review and Updation of Mining Plan.
5. Address of the lessee may be removed from the cover page.
6. Lease expiry should be written as 23.05.2000 (as per ML deed) and up to 23.05.2030 as per the M M (D&R) Amendment Act, 2015.
7. Educational qualification of the QP to be mentioned in the cover page.

GENERAL

8. 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.
9. Since the ML period was expired on 23.05.2000 (as per ML deed), it is to be clarified whether ML period extension upto 23.05.2030 have been obtained by the lessee or not from the State Govt. of Karnataka.
10. Para 1.0 (d) and (e): Name of the mineral included in the lease deed and intends to mine should be corrected as manganese ore.

LOCATION AND ACCESSIBILITY

11. Para 2.0 (a): ML period as per the ML deed should be corrected as 23.05.2000(20 years from 24.05.1980).
12. 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

13. 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.
14. 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.

15. Para 3.6: This para is not applicable for the present document.

PART-A

16. Para 1.0 (e) (iii): It is to be clarified here whether at least 10% of manganese ore samples collected from the existing pits and trenches have been analyzed from NABL or similar accredited laboratory or not. Copy of the NABL accreditation of the laboratory with chemical analysis report to be enclosed with the document.
17. Para 1.0 (i): As evident from the site inspection and from the geological plan that lease hold area has not been explored by boreholes; reserve and resources of the deposit has not been estimated in accordance with UNFC norm and as per the Evidence of Mineral Content Rules 2015. 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, future exploration proposals are required to be corrected. Immediate exploration should be taken up for manganese mineralized area.
18. Para 1.0 (j): Reserve of manganese ore should be estimated up to the depth of existing manganese pits only due to unavailability of subsurface borehole data. Consideration of bulk density and recovery of manganese ore should be duly justified.
19. Para 1.0 (k): Section wise reserve and resources are not estimated as per UNFC norms; true thickness of reserve can only be estimated from section nos. L-L' to O-O' (4 nos. of sections) considering influence of exposed manganese benches. In remaining sections, resources of Mn ore should be estimated under UNFC Category 333 only.
20. Para 1.0 (l): Level of Exploration wise manganese ore resources may be corrected in page 22. Date of estimation of category-wise reserve and resources should be updated as on 28.02.2018 and to be given only for manganese ore.
21. Para 2A (a), the present mining pits is not described in brief, the slope of faces, direction of advancement, approach to the faces & specification of roads, etc to be marked. Also, the existing dumps spread parameters, height, slope protective works etc., to be marked. Similarly the proposed workings should be briefed in short. The bench wise, mRL wise, opening reserves, exploitation and the closing balance should be furnished for the proposed periods.
22. Para 2.0 (b): Year-wise tentative excavation quantity of manganese ore during 2018-19 to 2022-23 should be corrected in accordance with re-estimation of reserve as per UNFC. Total 675,292 tonnes of manganese ore is proposed for production during 2018-19 to 2022-23, the same production should be substantiated by adequate reserves
23. Para 2(C), the individual year wise plan & sections, workings should be given with brief descriptive manner, instead of referring the plates. The mRL & the direction of advancement it is expected to move in the respective years may be dealt, also indicated in the plan and sections for the clarity.
24. Para 2.0 (f): All subject items pertaining to 'conceptual mine planning' are not found to be furnished. This para may be duly re-attended covering all subject items viz. latest available reserves resources, anticipated life of the mine in light of production, recovery of ROM, disposal of waste, backfilling of voids, reclamation and rehabilitation.
25. 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.

26. 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 up to 31.03.2023 should be enclosed with the document.

PART- B

27. 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) Lease Sketch (Plate no.2): Survey nos. in the enclosed lease sketch is not legible.
 - c) Surface Plan (Plate nos. 3A &3B): Latest surface plan should be provided with the document, date of survey in the enclosed surface plan is mentioned as 25.09.2016. This plan should be duly signed by the surveyor. Latest mining benches and pit positions are not updated in the plan.
 - d) Geological Plan (Plate nos.4A & 4B): Levels of exploration (viz. G1, G2 or G3) as per UNFC are not marked in the plan. Sample collection and trench locations as mentioned in the para 1.0 (e) should be shown in the plan.
 - e) Geological Sections (Plate no. 5): UNFC codes should be corrected in the section as per the comments given for para 1.0 (k) and accordingly reserve / resources estimation should be carried out as per the demarcated UNFC codes. Projected ore body below UPL required to be demarcated as UNFC Cat. 333.
 - f) Development & Production Plan &Section (Plate No. 6A): The year wise development, advancement of benches proposed for the each year may be shown and brought out for understanding. In the light of the of the above remarks, the remaining year wise developments & production should be undertaken and also in the text part.
 - g) 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.
 - h) Conceptual Plan(Plate No.9B): The plan is not prepared as it is required to be prepared, by depicting the workings, dumps, stacks & infrastructure will be at the end of the workings/ or closure of the mine.
28. **Para 11, Annexure:** Avoid any type of stamping in the annexure, enclose following items:
- a) Copy of the ML deed extension letter from Govt. of Karnataka as per the MM (D&R) Act, 2015.
 - b) Copy of the certificate of incorporation of "M/s Lakshmi Cement and Ceramics Industries Ltd" as a company.
 - c) List of board of directors with address and contact nos. Copy of the recent resolution of board of directors indicating nominated owner for the company, duly signed by the company secretary.
 - d) Corrected detailed section-wise calculation of reserve and resources of the deposit (for manganese).
 - e) Copy of the analysis reports of manganese ore from NABL/ similar accredited laboratory.
 - f) Copy of the beneficiation study report of manganese ore, if any. Few photographs of mine pit, waste dumps and boundary pillars. Copy of valid Bank Guarantee, valid up to 31.03.2023.

