

Report on Scrutiny of Mining Plan including Progressive Mine Closure Plan in respect of Ghorawat Limestone Deposit over an area of 35.98 hectares near villages- Ghorawat, Tehsil- Pipar City, District- Jodhpurof Rajasthan State applied by M/S Marwar Cements Ltd., Submitted under rule 16(1) of MCR 2016 & 23 of MCDR 2017 for fresh grant of mining lease under Major Mineral.

1. Correct address of the applicant should be given with proper documentary evidence because the receipt of mining plan sent to applicant has been return back with postal remark “left.”
2. The rule under which the mining plan submitted is wrongly given in consent letter. Similarly the tehsil is also wrongly given. In the consent letter the serial number of the paras should also be corrected.
3. The submission of Progressive Mine Closure Plan is now under rule 23 of MCDR, 2017. Correction should be made on cover page, certificates & in relevant paras of the text.
4. The lease period given on cover page and other pages should be corrected as per State Govt. Letter.
5. The letter issued on 27.03.2015(annexure 3) by State Govt. in the name of M/s Vedanta Industries whereas the name of company has already been changed w.e.f. 12-03-2014 to M/s Marwar Cement Ltd. Please clarify. The letter from State Govt. indicating their intention to grant mining lease in favour of M/s Marwar Cement Limited should be submitted.
6. Under preamble chapter, third para of page 4, the ML no. given is not correct.
7. Para 1b, page 6: It is written that the list of board of directors is given as annexure-6, It should be given on proper letter head and should be signed by the authorized person.
8. Para 1f, page 7: The word recognized person should be replaced with qualified persons.
9. It may be clarified whether there exist any National Park, Forest Sanctuary etc within a distance of 10 Km from lease area. If so, the copy of order permitting mining operations in the lease area obtained from competent authority should be enclosed.
10. There are houses, electric line, lime kiln etc. in applied area. Commitment should be made under para 2(b), that the mining in that area will be carried out only after getting NOC/clearance from individual/Government.
11. A copy of application made for grant of Mining Lease to the State Government should be enclosed as annexure
12. PartA, 1C, page no.15: Under local geology the structural details with trend(Strike & Dip) of litho units should be given.
13. The section wise reserves given in annexure 15.1a-d is not matching with the section given in plate 05. Please check & correct.
14. The reserve figures given for different categories like block reserve in table 1.6, inferred mineral resource (333) on page 29, differs with the figures given in table 1.10.
15. The road shown in Khasra map but it has not been taken into account while calculating the block reserve. Hence, the reserve chapter should be redrafted in light of UNFC guideline for better understanding about mineral reserve/resource as well as mineable & blocked reserves.
16. 4(c), page 64: In table 4.2, the area covered for staking of top soil during plan period is given but same is not shown in FA table at page 111.
17. In Chapter 7, the regular medical checkup& other benefits to the miners pertaining to their health should also be proposed in this chapter.
18. All the modifications as suggested above for Mining plan may also be taken care of in relevant Para’s of Progressive Mine Closure Plan.
19. Table 8.29, page 112: In FA table the total figure given for area put to use at the start of mining plan is wrong. Please check & correct.

20. The amount for FA should be calculated as per Rule 27 of MCDR, 2017.
21. Annexure 6: List of board of Directors should be given on letter head and signed by the authorized person.
22. Annexure 12: Report of analysis is given in the name of M/s Shankar Laboratory, Delhi. Latest Air, water, soil & rock analysis report of the samples with their location & name of lessee should be submitted.
23. Annexure 14: The present area is the amalgamated part of earlier MLs under minor mineral not the PL area. Hence it should be better to call exploration report instead of prospecting report. On page 176 the ML no. is wrongly written. Similarly on page 177 it is written that entire area of 35.98 hect. has been covered under prospecting in June 2013. How? The area of 35.98 hect. has been assigned to this ML only after amalgamation on 01.04.2015. Please make it clear.
24. The prefeasibility report enclosed as annexure 16 is not as the format prescribed under Mineral Evidence Rule, 2015. Further the operating expenses mentioned in the submitted pre-feasibility report do not account for the recurring expenses towards DMF, NMET and reclamation, rehabilitation measures etc. The capital cost on mine development has also not been accounted in the cash flow statement. This statement needs to be revised to arrive NPV, IRR and payback period

Plates:

25. In all the plates submitted
  - (i) The date of Magnetic meridian as per rule 31(1)(b) of MCDR 2017 has not been marked.
  - (ii) The date of Survey given in few plates is very old i.e. before amalgamation of leases. The latest survey date should be given.
  - (iii) The wind rose diagram given in Key & Environment plan is for the month March to May 2009. The latest survey date should be given.
  - (iv) Standard symbol for soil and other litho units should be given.
26. Surface Plan:
  - (i) The highest and lowest RLs of the area should be indicated.
  - (ii) The coordinates (lat. & Long.) of all the corners of the lease area should be marked.
  - (iii) The existing land use of the area like waste land, forest, sanctuaries, agricultural land and grazing etc. has not been depicted by suitable color code over the surface plan and symbolically in the index.
  - (iv) Road shown in khasra map but same is not marked on plan.
  - (v) The electric line, poles and transformers are given in index but not shown in plan.
  - (vi) The area has not been connected with three fixed reference points by DGPS/GPS.
  - (vii) Surface water drainage pattern with direction of water flow has not been depicted.
27. Surface Geological Plan & Section:
  - (i) All the discrepancies pointed out in reference of Surface plan except land use should be taken care of in this plan also.
  - (ii) Trend (Strike & Dip) of litho units not shown on map.
  - (iii) Standard symbol for soil and other litho units should be given.
  - (iv) Same symbol & colour has been used for showing permanent structure & G2 UNFC resource.
  - (v) Same symbol for electric line and pole is given in index. But in plan it differs.
  - (vi) Assay value of sample analyzed is not marked on plan.

- (vii) Bore holes marked on plan but not shown in sections. Similarly the haul road also not marked on some sections. The bore hole nomenclature used in plan should also be given in index for better understanding.
- (viii) UNFC resource category not marked on section AA'. The section wise/bench wise reserves given in annexure 15.1a-d is not matching with the lithounits shown in the sections.

28. Development Plan:

- (i) All the surface & geological features of the area have not been marked.
- (ii) Approach to propose faces, direction of advancement, slope of faces have not shown.

29. Environment Plan:

- (i) Road shown in khasra map but same is not marked on plan.
- (ii) Only govt. land is marked. The land use of area has not been depicted by suitable color/ symbol code for the leasehold area & adjoining area.
- (iii) The points suggested for modification of Key plan & Surface plan should be taken care of while preparing this plate.
- (iv) The area of the village with its name & population should be marked in this plan.
- (v) The monitoring stations of Air, Water & noise has neither indexed not marked on the plan. These should be judiciously selected with relation to predominant wind direction, water flow direction & degree of likely site specific impact of various mining operations as per direction of advance etc.

30. Conceptual Plan: Details of excavation, reclamation/rehabilitation, plantation etc. for consecutive five years blocksup to lease period have not been incorporated in conceptual mining plan. It should be corrected as per the text.

31. Financial Assurance Plan should be corrected as per the corrections made in text.

32. All boundary pillars should be erected, showing their well-defined coordinates .

33. There are minor typographical mistakes/correction/omissions on the plates as well as in text should also be attended carefully.

34. The entire document and plans should be submitted in soft copies by e-mail in PDF format. An undertaking may also be given that the documents in hard copy & in soft copy are same.

35. Each and every page should be signed by the person preparing the document.

Dated  
Place Ajmer

(Dr. A.Z.Khan)  
Senior Mining Geologist