

Report on Scrutiny of Mining Plan including Progressive Mine Closure Plan in respect of Ghorawat Limestone Deposit over an area of 195.7064 hectares near villages- Ghorawat & Borunda, Tehsil- Pipar City, District- Jodhpur and village Pundulu, Tehsil Merta, District- Nagaur of 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.

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 on cover page as well as 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. Para 1b, page 7: 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 authorized person.
5. Para 1f, page 8: the word recognized person should be replaced with qualified persons.
6. The mining plan has been submitted for area under villages Ghorawat & Borunda in Tehsil- Bhopalgarh, District- Jodhpur of Rajasthan State and village – Pundlu, Tehsil – Merta City, District. – Nagaur, but the letter of intent vide letter no P.3(55) Khan/ Group-2/2014 (Placed as Annexure -1) as well as letter of State Govt. placed at annexure-2 has been issued for area under village Ghorawat in Tehsil- Bhopalgarh, & Pipad District- Jodhpur only. Please clarify.
7. Para 3.6, page 14: The rule for submission of mining plan is not correct.
8. There are houses, electric line, temple etc. in applied area. Commitment should be made under para 2(b), that the mining in that area will be carried out after getting NOC/clearance from individual/Government.
9. PartA, 1C, page no.15: Under local geology the structural details with trend(Strike & Dip) of litho units should be given.
10. The section wise reserves given in annexure 15.1a-d is not matching with the section given in plate 05. Please check & correct.
11. The reserve figures given for different categories like block reserve in table 1.8, indicated mineral resource(332) on page 34 differs with the figures given in table 1.10.
12. Block reserve is calculated for buffer zone, Ultimate Pit slope and Road. What about the temple which is there in the ML area. 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.
13. Para 2A(b), Page 41: excavation during scheme period is given. It should be corrected as plan period.
14. In Chapter 7, the regular medical checkup& other benefits to the miners pertaining to their health should also be proposed in this chapter.
15. All the modifications as suggested above for Mining plan may also be taken care of in relevant Para’s of Progressive Mine Closure Plan.
16. The amount for FA should be calculated as per Rule 27 of MCDR, 2017.
17. Annexure 6: List of board of Directors should be given on letter head and signed by the authorized person.
18. Annexure 10a is not legible.
19. 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.

20. 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:

21. 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 are 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.
 - (v) Different nomenclature of bores like PBH, PVBH and MCL has been shown on plan & sections but not properly indexed.
22. 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 indicated.
 - (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) Surface water drainage pattern with direction of water flow has not been depicted.
23. 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) Standard symbol for soil and other litho units should be given.
 - (iii) Bore holes projected on section line but not written as projected. Similarly the haul road also not marked on some sections.
 - (iv) The section wise/bench wise reserves given in annexure 15.1a-d is not matching with the litho units shown in the sections.
24. Development Plan:
- (i) All the surface & geological features of the area have not been marked.
 - (ii) Approach to propose faces, slope of faces have not been shown.
25. Environment Plan:
- (i) On plan govt. land & waste land has been marked. Where as in chapter 2, page 9 of the text two type i.e Govt. waste land & private land has been given. Please check & correct.
 - (ii) The points suggested for modification of Key plan & Surface plan should be taken care of while preparing this plate.
26. Conceptual Plan: Conceptual plan on standard scale showing details of excavation, reclamation/rehabilitation, plantation etc. for consecutive five years blocks upto lease period should be submitted.
27. Financial Assurance plan should be submitted on standard scale showing details of five year activities for broken area, reclaimed, rehabilitated, plantation etc. The FA table give in plan should be correlated with the FA table given in text.
28. All boundary pillars should be erected, showing their well-defined coordinates.

29. There are minor typographical mistakes/correction/omissions on the plates as well as in text should also be attended carefully.
30. 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.
31. Each and every page should be signed by the person preparing the document.

Dated
Place Ajmer

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