

Scrutiny Comments on modified mining plan including Progressive Mine Closure Plan in respect of Bariyara Siliceous Earth Mine(MLno5/2010) over an area of 4.50hectares near village-Bariyara,Tehsil-Shiv, District- Barmer (Rajasthan) of M/S Haritsons Pvt. Ltd. Submitted under rule 17(3) of MCR,2016.

1. A recent colored photograph showing the mining activity with proper caption & correct category of mine has not been given on the cover page of text. Since the mining operation has been proposed by semi mechanized method by deployment of excavator in the text, so it will be a category A other than fully mechanized mine.
2. As per the rule 15(1) of MCR, 2016 the mining plan is to be prepared by Mining Engineer or Geologist having the requisite qualification & experience, therefore the word RQP may be deleted from all places of text and plates.
3. Each and every paper including certificates and declaration enclosed with the text should be serially numbered.
4. Few more colored photographs covering mining, dumping of waste and other allied activities of the area may be submitted with their proper caption.
5. A copy of lease grant order may also please be submitted & mentioned the list of annexures.
6. In para-1of Introduction chapter it is mentioned that “lease deed in favor of M/S Haritsons Mintech Pvt. Ltd. is issued to submit modified mining plan with PMCP” the meaning of this statement confusing. The chapter should also cover the purpose of present submission, reserves position the production proposed with respect to the previously approved mining plan. The details of other areas held under lease and issues related to illegal/irregular mining, royalty, pending revision matters with the state govt. The public interest litigation (PIL) and court case pending with lessee if any may also be described.
7. The information required under each item of text should be given as per the standard prescribed format and guide line only. Some of the items as required in the guidelines may be not applicable, even than title of that subheading should be mentioned & serial number of heading/ subheadings should also not be changed by the person preparing the document so as to maintain the uniformity & homogeneousness of the document.
8. A CD covering the entire document and plans should be enclosed. An undertaking may also be given that the documents in hard copy & in CD are same.
9. There is no commitment that during pendency of approval, if there is any change occurs in name/ address/ it should be informed promptly.
10. Chapter-1: The title headings of standard format have not followed. The item 1©& (d), (e) & (f) are not match with the prescribed format. The person preparing the document should not change the heading of the format please check and correct at all places of text. This is an existing mine, So the word lessee is appropriate to be used instead of word used applicant in text and plates or wherever applicable.
11. Item 1(d): the word RQP should be deleted from all places of text& plates in view of rule 15(1) of MCR, 2016.
12. Item 2(a): The date of registration& expiry of lease and Fax number of lessee should be mentioned. The latitude & longitude of lease boundary pillars given in table on page-6&7 are authenticated by the competent authority of state govt. (DMG) or not is to be stated clearly under this para. Authenticated coordinate need to be given on plans. Further on line scrutiny sheet for coordinate of pillar should also be enclosed.

13. Item 2(b): The numbers of annexures mentioned in text and the number of annexure what has been actually shown on the annexure is different. The annexure should be systematically serially numbered, annexed and referred.
14. Item 3.3: Under review of earlier approved mining plan page-8 item3.3 the proposal of approved modified mining plan have been reviewed please confirm is there any modifications approved earlier& items 3.4, 3.5&3.6 have not been attended and simply mentioned not applicable which is not appropriate. The required information should be attended& furnished as per the sub headings discussing &consulting with lessee. The review proposals of exploitation, plantation &waste management of last approved mining plan has not been furnished with mark deviation.
15. Item 3.6: The relevant provision as per MCR, 2016& new enhanced lease period in years and if any reference received from the DMG govt. of Rajasthan should also be mentioned.
16. Part-A: As per item1 (a) of prescribed format, the topography of lease area has not been explained integrating with the topographic plans (plate nos.3). Heading in format is mentioned as topography but in submitted document it is stated physiography. The location &extension of pits, waste dumps &mineral stacks shown over the plan does not match with the field. The identity name or number of pits has not been indicated on surface plan.
17. As per item1(b) of prescribed format, the Geology of lease area has not been explained integrating with the geological plan (plate no.4) & indicating the shape and size of the mineral body ,type of deposit, structural features strike and dip of the deposit has not been discussed.
18. As per item1 (d) of format, the details of prospecting/exploration agencies as per the guide line may be attended& furnished under this heading.
19. Item 4.4: The detail & level of prospecting /exploration already carried out in the area has not been furnished &shown over the geological plan as per the guide line. The complete chemical analysis report for entire mineralized area for all radicals from a NABL accredited or the other Government laboratory should be submitted.
20. The expenditure incurred for prospecting /exploration already carried out has not been furnished as per guide line.
21. Item 4.7.8: The reserves and resource estimated in last approved mining plan with their grade with respect to the threshold value notified by IBM has not been referred and furnished in the present document. The level of exploration carried out for estimation of resources as per the prescribed format has not mentioned.
22. Item 4.7: Under this heading the top soil & overburden is stated be generated but on geological plan plate-4 no top soil and over is available to be shown which is contradictory. Necessary correction should be made.
23. The future exploration has not been proposed whereas in table mentioned on page-15 a total of 22575 tons of resources are yet to be converted in to reserves, So the proposals of exploration for converting all resources in to reserves, location wise and year wise be given and shown over the geological plan. Further the expenditure likely to be incurred for the proposed exploration should also be mentioned.
24. Item 4.9: Table - 4.2 on page-15 detailed calculations of reserves/resources with grade and supported by chemical analysis report from a NABL accredited or the other Government laboratory has not been furnished. Further the resources and reserves within lease have not been stated to be arrived after feasibility study and economics evaluation of deposit based on various factors as mining method, recovery factors, mining losses, processing loss, cut of grade, ultimate

- depth of proposed, mineral blocked due to benches, barriers, road, nala, reservoir, electric line and other statutory barrier and where necessary permission are not available.
25. Item 5.1&5.2: As mentioned the mine is proposed to be worked by semi mechanized method of working by deploying the JCB(Excavator) and dumpers thus it will be a category “A” other than fully mechanized mine the same should be corrected on the cover page and where ever applicable in the text.
 26. Item 5.3&5.4: The nature& type of overburden and the mineral rejects proposed to be excavated and generated has not been clarified and explained as defined under the guide lines. Further the insitu tentative excavation of ROM in cu m, pit no., bulk density, top soil generation in cu.m. etc. according to guide line has not mentioned in table no 5.4 on page-19.The use of mineral rejects by way of blending and alternative uses of waste as minor mineral, bund preparation or the dispose of as total waste need mentioned keeping in view the mineral conservation and zero waste mining.
 27. Item 5.4: The headings of prescribed format i.e. 2A(b)-II,(c),(d),(e) of chapter on open cast mining of the standard format regarding dump re handling, year wise development, salient features of proposed method& brief lay out of mine faces, lay out pit road etc. have not been attended.
 28. Item 5.7: In Conceptual mine planning up to the lease period and up to the life of mine tacking in to consideration the present available reserves and resources describing excavation, recovery of ROM, disposal of waste has not been described as per the guide line. The plantation proposal has not been given financial year wise on page no.21. The year wise number of saplings to be planted for the period of modification and up to the lease period along with area to be covered under plantation has not mentioned under this chapter. The ultimate pit limit, area to be reclaimed and to be covered under afforestation at the end of third year, lease period and up to the life of mine has not discussed supporting the conceptual plans with few relevant sections. The conceptual plan pate no.7 indicates reclamation and rehabilitation of worked out area but in para5.11 on page-20 text it is mentioned that no reclamation is proposed which is contradictory to each other which need be corrected. The technical person should go through the item 7(f) of chapter 2A of standard format and according information should be attended.
 29. Mine drainage: Chapter no 6A minimum & maximum depth of water table of the area, arrangement for arresting solid waste, annual rain fall& the likely quantity of rain water through the lease area etc. has not been described as per the guide line.
 30. Chapter-7: As per the geological plan and sections plate-4 no top soil available at site of proposed working but in text its generation is mentioned /described the text and plan are contradictory which need be corrected. The financial year wise period of top soil generation &disposal has not been mentioned. The quantity of rejects generation mention is contradictory to the quantity mentioned on page no19.
 31. On page no.24 in description of disposal of waste it should also indicate whether the site of dumping of waste to be proved for presence or absence of mineral and outside of UPL unless simultaneous backfilling is proposed or purely temporary dumping for short period is proposed in mineralized area with technical constraints & justification as per the guide lines. Further all protective measures of stabilization of proposed dumps have not been marked on the relevant (reclamation plan) plans and section.
 32. Item 10: All the site services such as office and store, first aid room, rest shelter, water hut and toilets urinals etc. has not been marked on a relevant plan.

33. The proposal of employment of full time Mining Engineer and Geologist as per Rule 42 of MCDR.1988 has not been proposed considering the category of mine under details of employment.
34. The title of the PMCP on page-28 has been mentioned confusingly it should be as per the standard. It is not required to indicate the irrelevant rule. Necessary correction should be made.
35. Item 10.1.1: In addition to the information furnished under description of existing land use pattern area covered under private land ,agricultural land, township, human settlement and any sanctuary is located in the vicinity as per the guide line of standard format also need be given in a tabular form.
36. Item 10.3.1&10.3.2.The proposals of reclamation and rehabilitation of mined out land and manner in which the actual of pit or site will be restored for future use supporting yearly plan and sections depicting yearly progress in the activities for land reclamation/restoration/rehabilitation afforestation called “Reclamation plan”. The reclamation plan should be submitted in a separate plate. Under heading of top soil management the top soil removal and utilization is mentioned but as per the geological plan no top soil exposed at the site proposed for working during proposed plan period which need be corrected.
37. Item 8.2(iii): As per format of guide line the quality of water of the lease area has not been supported by analysis report carried out test from a NABL accredited laboratory.
38. Item 8.3: As per format of guide line progressive reclamation plan the summary of year wise proposals for protective measures for reclamation and rehabilitation works on year wise as per the item 8.3 of standard format the vital information regarding dump management, management of worked out benches reclamation & rehabilitation of by back filling, rehabilitation of waste land with in lease other activities has not been furnished in the prescribed table supporting the reclamation plan and section prepared as per the guide lines.
39. Item 10.2.1:The area likely to be degraded due to quarrying, dumping of waste, roads, workshop, processing plant and township etc. have not been mentioned and shown over the relevant plan and sections. The proposals vital information of monitoring of ambient air & water quality, noise and vibration levels by periodical survey has not been proposed.
40. Item 10.2.6: In addition to the information furnished the activities to be carried out by the lessee for community development, environment protection, other social welfare works in peripheral area should also be described.
41. A financial area assurance plan in a separate plate showing the outlines of the existing workings, dumps, stacks& allied mining activities etc. and covering prescribed activities in table of items 8.6 for calculation of financial assurance should be submitted along with the financial assurance required under rule 23F (2) of MCDR, 1988 as per the category of mine.
42. As per the guide line a certificate duly signed by the lessee to the effect that closure plan complies all statutory rules, regulations, orders made by the central or state Govt. statutory organizations, court etc. have been taken into consideration and wherever specific permission is required, the lessee will approach the concerned authorities to be given. The undertaking also to be given by the lessee that all the measures proposed in this closure plan will be implemented in time bound manner as proposed
43. The consent letter/ undertaking/ declarations/ certificate from the lessee and technical person enclosed should be corrected since there is no concept of RQP as per the MCR, 2016. The Mining Engineer or the Geologist having qualification and experience has to furnish the required documents.

44. The plans and sections should bear a certificate as prescribed by CCOM i.e. Certified that the plans and sections are prepared based on the lease map authenticated by the authority of state Government.
45. As per the guide line separate reclamation plan and financial area assurance plan should be submitted

Plates:-

46. Surface Plan: The intermediate pillars, RLs of bench mark, seasonal nala, fixed reference point, type of land whether it is govt. land, private land, agriculture or Chragah land has not been marked mentioned in index. Further the existing location size shape of excavations, mineral stacks & waste dump has not been surveyed and marked as per the field condition. The same should be corrected as discussed during inspection. Generally section of surface plan is not required to be drawn and shown as has been done.
47. Geological plan & section: The discrepancies pointed for surface plan need be attended. The extension of different category of reserves asper the UNFC category laterally as well as depth ward need be marked. The ultimate pit limit latterly and toward depth at the end plan period and lease period has not distinctly marked & shown indicated in index.
48. Year wise development plan and section: The proposed year wise development & plantation has not been indicated in index. The waste dumping& plantation proposal be marked on financial year wise basis.
49. The section of conceptual mining plan has not drawn and submitted.
50. Environment Plan: The ML/ PL area, type of building, residential houses, roads, power line and farm land falling within 500 m has not been marked & not prepared as per rule 28(5)(a) of mdr,1988.
- 51 A composite map showing of all the three adjoin leases may enclosed.
52. The conceptual plan (plate-7) has not been supported with few conceptual sections.
53. All boundary pillars has not been erected, with their precise coordinates as authenticated by the state government and the photograph of each & every pillar showing their well-defined number has not been submitted.
54. There are few corrections marked in text & plates which should be attended properly.
55. Each and every page should be signed by the person preparing the document.
