

**Scrutiny Comments on modified mining plan including Progressive Mine Closure Plan in respect of Marwar Mundwa Limestone Mine(MLno111/2007) over an area of 699.9hectares near villages-Rupasar,Inana,Mundwa,Bhadana,Tehsil-Mundwa , District- Nagaur (Rajasthan) of M/S Ambuja Cements Ltd. Submitted under rule 22(6) of MCR,1960.Inspected on 15/05/2016.**

1. The modified mining plan has been submitted under MCR, 1960 which has been repealed with the notification as MCR, 2016. Hence, the document should be submitted under relevant provisions of MCR, 2016. Further the person preparing the mining plan needs to be in accordance with Rule 15(1) of MCR, 2016 .Necessary corrections should be made at all relevant places.
2. The implementation period of submitted document should be given financial year wise on cover page & at all relevant places of text and plates.
3. Each and every paper including certificates and declaration enclosed with the text should be serially numbered.
4. Status of area with proper caption has not been given on the cover page of text. Few more colored photographs covering mining, dumping of waste and other allied activities of the area has not been submitted with their proper caption.
5. All annexures may be self attested.
6. On perusal of the document it is noted that a copy approval letter of earlier approved modified mining plan has been enclosed as annexure-1 stating this document as the approved mining plan (last para of page-1). It needs to be clarified that how mining lease was granted on the basis of document approved under 10 of MCDR.1988.The present submission also a modified mining plan, although mining operations are yet to commence. The review and modification of which document is done (mining plan or modified mining plan) same may be Please clarified & explained with supporting copies of document. Further environmental clearance (Annexure-II A) has been obtained in favor of M/S Indo Nippon special cement Ltd, whereas the lessee is M/S Ambuja cement Limited. The supporting document for the changes or the transfer of this lease to M/S Ambuja Limited need be submitted.
7. As annexure-iv copy of lease deed has been enclosed, also a copy of lease grant order may please be submitted.
8. Introduction chapter should also cover 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.
9. The information required under each item of text should be given as required under the guidelines. 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.
10. 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.
11. There is no commitment that during pendency of approval, if there is any change occurs in name/ address/ it should be informed promptly.
12. Item 1(f): the word RQP should be deleted from all places of text& plates in view of rule 15(1) of MCR, 2016.

13. Item 2(a): The coordinates of lease boundary pillars authenticated by the competent authority of state govt. (DMG) have not been given in text & on all statutory plans. Further on line scrutiny sheet for coordinate of pillar should also be enclosed.
14. Item 2(b): The lease revenue details khasra wise area break up of private land/ govt. land should be given in a tabular form has not been given. A plate namely Khasra map covering all the khasra falling within lease area has not been submitted.
15. Item 3.1(a) & 3.2: As per the copy enclosed as annexure-I the modified mining plan has been approved vide letter dt.08/03/2004 & not the mining plan as stated. The statement stating under para 3.2 as "no modification made in the last approved mining plan" is confusing which needs to be clarified.
16. Item 3.3: A copy of document whose review is mentioned in the present submission may be submitted for verification.
17. Item 3.6: The new enhanced lease period in years and the reference received from the DMG should also be mentioned.
18. Part-A Item 1 (a): The topography of lease area has not been explained integrating with the topographic plan (plate no.3A) indicating the topography of different parts of the lease area. The drainage pattern and vegetation of lease area has not been discussed. The highest and lowest RLs should be highlighted and mentioned in the text as per the surface plan. Further instead of using abbreviation (a.m.s.l.) the full forms of the terms should be used in text and plates where ever applicable.
19. Item 1 (b): The Geology of lease area has not been explained integrating with the geological plan (plate no.4A) indicating the shape and size of the mineral body, type of deposit, structural features strike and dip, thickness of litho units of the lease area has not been discussed.
20. Item 1 (d): Email address and phone number of all prospecting agencies may be given under this heading.
21. Item 1 (e): The location wise extent of lease area in hectares already covered under exploration at G1 level laterally & depth wise should be mentioned. The complete chemical analysis report for entire mineralized area for all radicals from a NABL accredited or the other Government laboratory should be submitted. Further the expenditure incurred in various prospecting/exploration operations may be given.
22. Item 1 (i): The future exploration may clearly show proposals of converting all resources into reserves, location wise and year wise. The part of lease area to be explored, number and identity of each proposed bore hole (core/RC/DTH), grid interval should be mentioned in text and shown over the geological plan. Further the expenditure likely to be incurred for the proposed bore holes drilling has not been mentioned.
23. Item 1 (j): The reserves and resource estimated in last approved mining plan with their grade with respect to the threshold value notified by IBM depletion of reserves if any has not been referred and furnished in the present document. The detailed calculation of a feasibility study report along with financial analysis for economic viability of the deposit as specified under the UNFC field guidelines may be incorporated.
24. Item 1 (k): The detailed calculations of reserves/resources section wise when a mine is fully mechanized with grade and supported by chemical analysis report has not been furnished. Further the resources and reserves within lease have not been stated to be arrived after feasibility study and economic 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. Further the details of blocks considered for reserve estimation have not discussed in text and the block boundaries shown over plans are incomplete.
25. Item 2A (a): It has been mentioned that this modified mining plan has been submitted for the period of 2013-14 to 2017-18 giving the proposal for the year 2016-17 to 2017-18 under rule 22(6) of MCR, 1960. The MCR has been repealed as MCR, 2016 accordingly correction regarding relevant provision of submission of document need be made at where ever applicable text and plates. The submission of proposals for the elapsed period (2013-14 to 2015-16) cannot be considered. Further it may be mentioned that generally the proposals of exploration, development, exploitation, plantation, reclamation and rehabilitation are to be given.
  26. Item 2A (b) I&(e): It may clearly mentioned that the modified mining plan is submitted for the five years spell period 2013-14 to 2017-18 incorporating the proposals of left over period 2016-17 & 2017-18. Further the location of proposed working site, direction of advance of pit faces, year wise area to be covered under pit, bench parameters with RLs in OB & limestone to be developed, ore to over burden ratio & the size of pit at the end of each year has not been distinctly marked on plates & discussed in text. The year wise/bench wise opening reserve, exploitation & closing balance reserves for the plan period may be furnished in a tabular form to make the picture in one stroke.
  27. Item 2A (f): In Conceptual mine planning the identity number of proposed bore hole has not been mentioned in text. Further the description has not been explained indicating ultimate pit limits at the end of planned period, lease period and up to the life of mine need be furnished integrating with conceptual plan & section. The proposal of disposal of waste, backfilling of voids, reclamation and rehabilitation etc. also as per guideline up to the conceptual planned period to be described in text.
  28. Item 7.0: All the site services such as maintenance of workshop, office and store, first aid room, VT Centre and toilets urinals etc. has not been marked on a relevant plan.
  29. Item 8.1(i): Existing land use pattern indicating the 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 need be given in a tabular form.
  30. Item 8.2(iii): The quality of water of the lease area has not been supported by analysis report carried out test from a NABL accredited laboratory.
  31. Item 8.3: Progressive reclamation plan the summary of year wise proposals for this item may be furnished in tabular form as per the standard format of guide line.
  32. Item 8.3.1: Mined out land, it is mentioned that during modified plan period the green belt will be development work is proposed but the quantum of work in terms of numbers of & types of saplings to be planted and location has not been clearly mentioned in text and shown over the reclamation plan.
  33. Item 8.3.2: A specific year wise, location wise commitment for generation, stacking and utilization of top soil should be mentioned in text and shown over the plan. Necessary correction need be made.
  34. Item 8.6: The financial assurance should be submitted as per the rule 23F (2) of MCDR, 1988.
  35. 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

37. The consent letter/ undertaking/ declarations/ certificate 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.
38. 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.

**Plates:-**

39. Surface Plan: The RLs of bench mark, fixed reference point, type of land whether it is govt. land, private land, agriculture or Chragah land has not been mentioned. Further the highest and lowest RLs of lease area may be highlighted.
40. Geological plan & section:
  - (i) The extension of different category of reserves as per the UNFC category laterally as well as depth ward need be marked.
  - (ii) The sections lines drawn have not been highlighted.
41. 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.
42. All boundary pillars has not been erected, 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.
43. There are few corrections marked in text & plates which should be attended properly.
44. Each and every page should be signed by the person preparing the document.