Scrutiny comments on draft Review of Mining Plan &PMCP for Thennilai limestone mine over 2.51hect in Thennilai village Kadavurtaluk of Karur district Owned by M/s Raghavendra Minerals and Chemicals submitted under rule 17(1) of MCR, 2016 & rule 23 of MCDR-2017 for the period from 2018-19(from 12.11.2018) to 2022-23.Mine code 38TMN28029.

General: Status of EC permission and the quantity of yearly production sought/granted need to be discussed in introduction.

- 1.Para 2.0 :Coordinates furnished for boundary pillars of ML should be checked and verified for correctness. Total lease period of ML, 50 years from the date of execution of ML should be included under the sub para 2.0(a) and other relevant information of expiry of ML.
- 2.Para 3.3(i): The exploration work undertaken period should be discussed under the para. Existing pit's depth range should be furnished as it is not uniform.

Part-A

- 3.Para 1.0(b): Physical properties of limestone need to described under the para.
- 4.Para 1.0(e):It is mentioned under the tabe-14 that ,6no of core drills are under taken in exploration programme, but Notice of sinking of bore hole in Form-I&J for undertaking exploration under the supervision of geologist or mining engineer has not been communicated to office so far for record and verification.
- 5.Para 2.0: Yearly development production proposed should be within the limits applied for state environment Impact Assessment Authority. Copies of letters /communication received from state environment Impact Assessment Authority in this regard need to be briefed and annexed in the report.
- 6.Para 2.0(b):Year wise tentative excavation table nos.28,29 reveals that ,for the year 2018-19,a quantity of 130,052tonnes ROM for winning 78,031tonnes of limestone is proposed for a period of 4.5months period (12.11.2018 to 31.3.2019), another 79,061tonnes ROM for winning 47,436tonnes of limestone is already approved for period for 2018-19 (upto 11.11.2018) vide approved SOM dated.1.4.2016. The approved proposal for this year is between RL-173m to RL-165m from central part of ML to western side of ML. Further, the proposed area (RL-173m to RL-165m) which is already approved in previous document for the year 2018-19 is again proposed for the years 2019-20 and 2020-21 in the current document is contrary. Therefore, the Year wise development production scheme should be redrafted in a pro rata basis for remaining 4.5 months of 2018-19 and all the concerned tables should be corrected. The year wise development proposed indicated as from west to towards east, whereas the plate no.V reveals differently. The partial period of year 2018-19 should be indicated in the year wise production tables.

- 7.Para 2.0(b)(iii) Disposal of waste: Dumping area for storage of about 2 lakh tonnes of side burden, mineral waste and topsoil has not discussed under the para.
- 8.Para 2.0(c): Individual year wise development plan and section need to be prepared as per the guide lines being a mine category as A-OTFM.
- 9.Para 2.0(iv): The information regarding backfilling of voids is contrary to information/mention on reclamation & rehabilitation under sub para (v).
- 10.Para 4.0(a)(iii)(b)(c): Sufficient area/feasible proposal for dumping waste of 2 lakh quantity should be proposed in view of scrutiny on para 2.0(b). The proposals discussed are contrary to each other should be verified and redrafted.
- 11.Para 7.0:OMS calculation depicted should be corrected in view of scrutiny on para 2.0(b).
- 12.Para 8.3.5 : Table no.51,53,55,57,59 shows an area of 0.2hect back filling for each year and also mention of "no reclamation and rehabilitation is proposed in the document" which is contrary should be verified and actual backfilling should be shown in yearly development &production plan if back filling is proposed yearwise. Other table nos.49,63 shows waste dump site with symbol * is contrary should be verified and corrected.

All chapters of PMCP, feasibility report, UNFC report should be reconciled as per scrutiny for the paras of ROMP.

Part-B

All annexures and documents should be certified by Qualified Person.

- 13.Annexure-1B:Details of mine should be indicated on the annexure. Photographs of drilled bore holes made in the ML area under exploration programme also to be annexed in the report.
- 14.Annexure-XI: Notice of sinking of bore hole in Form-I&J for undertaking exploration under the supervision of geologist or mining engineer has not been communicated to office for verification and record.

Plates:

15. Plate no. II: The survey number 309/3 indicated is incorrect. It may be replaced with correct survey numbers.

Plate no.V: Individual year wise development plans & sections need to be prepared as document submitted in A OTFM category. No area for dumping waste of 2 lakh quantity is proposed and comments of scrutiny on para 2.0(b).

- 16.Plate no.VI: Proposed backfilling area marked is shown as 60mx43m should be verified and corrected in view of scrutiny on relevant sub para's of part-A.
- 17. Plate no.VIII: Details of other adjacent mines located on east and southern side to ML need to be labeled on the plan

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