

Inspection report cum Scrutiny comments on examination of modified Mining Plan in respect of Palkur Limestone mine of Shri B Rajendranath over an extent of 4.452 Ha. located in Palkur Village & Betamcherla Mandal, Kurnool District of Andhra Pradesh State submitted under Rule 17(2) of MCR, 2016.

1. The document should have been submitted as Modified Mining plan under rule 17(3) of MCR 2016 instead of Review of Mining Plan for the following changes
 - i. The method of Mining has been changed from Manual to Other than Fully Mechanised-Method, as Excavation and Loading operations are being carried out by JCB (Back hoe-Loader)
2. Land schedule of the lease area should be furnished clearly whether is it a Government Land or Private land in page no.6.
3. Average elevation of the ground profile of lease area had been changed from 500 meters (as per approved plan) to 244 meters above mean sea level, which needs to be clarified. Further details of Ground control points, bench mark to carry out the survey should be furnished in the text.
4. Details of topography survey carried out be furnished in para 1.0.a in page no.11.
5. Village road is found adjacent to lease area, the details of the same be furnished in page no.7 in para 2.0. b.

Review of Mining plan

6. There were proposal of exploration and OB generation in the earlier approved Scheme period i.e. 2015-16 to 2019-20, but in review chapter the proposals of the same is stated as Nil, to be incorrect.
7. Details of Year wise reclamation carried out in last plan period be furnished and depicted in Reclamation plan.

Geology

8. Analysis of different litho units in the lease area like Calcareous Soil, Limestone, Chert etc. be furnished.
9. Phase wise exploration carried out so far in the lease area be furnished in tabular form. Also furnish the details of bore holes/ trial pits/ trench carried out incorporating Location, dimensions/ bore hole depth, ore encountered up to etc. for clarity.
10. Expenditure incurred for exploration done so far be furnished with supporting document.
11. Limestone available in the lease area is 'Tufaceous Limestone', the details of its Bulk density, Hardness etc. be furnished.
12. Reserves/ Resources needs to be re-assessed as per MEMC Rules 2015 for the following reasons:
 - i. Reserves were estimated considering average depth of Limestone up to 3 meters only. Whereas during inspection it is observed that ore occurrence is up to 11 meters depth in the pit and is still continuing. Thus UPL needs to be reassessed and submitted.
 - ii. 6 DTH bore holes drilled is stated to be not considered for assessment of reserves, whereas in Geological sections bore holes were considered for reserve assessment.
 - iii. Collar RLs of bore hole submitted in Form-J are not matching with RL of bore holes indicated in the plans.
 - iv. Reserves in section A-A' has increased from 18,484 Tonnes to 30,690 Tonnes without any input of exploration.

In view of the above, the Reserves/ Resources needs to reassessed clearly indicating UPL, Grade of ore (Cut off grade vis a vis ore available), weighted average grade of ore etc.

13. Justification of UNFC codes be furnished as per the guidelines.

Mining

14. Present mining activity should be furnished in tabular form incorporating pit dimensions, no. of benches in ore, OB, Pit bottom. Further present position of dumps, reclamation/ rehabilitation carried out, Mineral stocks with their dimension, Location, Top- Bottom RL's etc. be furnished.

15. Area proposed for backfilling in section C-C' should be proved for absence of ore duly supported with documentary evidence. In this regard ore from pit bottom should be collected and analysed by lab accredited by NABL or Government Lab, copy of the same be submitted for considering the same.
16. There is no waste rock observed in the lease area. In last plan period also there is no generation of OB is reported. Whereas in the present plan period again generation OB is proposed, which need clarification.
17. Top soil usage be proposed for the purpose of plantation only instead of creating bund.
18. Mine pit layout should be detailed and depicted in the year wise development plan.

Conceptual plan

19. Reserves considered for computation of Life of the mine at conceptual stage is 1,21,951 MT different than that of available reserves in Geology chapter 71,917 Tonnes (page no.20), please clarify.
20. Basis of backfilling the mined out area in the absence of OB should be justified.

Mine Drainage

21. The details of Canal exist on Eastern side of the lease area be furnished.

Stacking of Mineral reject

22. Ore is found dumped in the waste dump yard, in this regard analysis of waste/ OB dump needs to be carried out with adequate no. of samples and submit.

Use of Minerals

23. The Limestone content in the lease is of Chemical grade instead of stating it as " Low grade Limestone"as the Limestone contains more than 48% Cao.
24. Grade of ore available in the lease area should be furnished and accordingly its usage be detailed in entire para 5.0.

PMCP

25. Details of land put to use at present as well at the end of the plan period be furnished, other details like area in 7.5 meters not utilized be avoided.
26. Financial assurance table be modified as most of the lease area has been degraded due to mining and allied activities.
27. Consent Letter, Certificates, undertakings should be submitted on Lessee's original letter head duly dated and signed by him.

PLATES:

1. Plans are submitted in 1:500 scale but the scale indicated is 1:1000 scale, which is to be corrected.
2. In title box: Purpose of the document prepared with plan period be furnished.
3. Surface plan submitted is not matching with actual field condition, excavation were found carried out up to lease boundary, but the same is depicted beyond 7.5 meters from lease boundary near ML pillar no.9
4. Surface Plan
 - i. Qualified person, Lessee should put their signature
 - ii. Ground control points considered for establishment of bench mark should be shown and detailed in text.
5. Environment Plan
 - i. There exist abandoned pits adjacent to lease area, the same be depicted
6. Conceptual Plan
 - i. Outline of area excavated at the end of plan period as well as at lease period be demarcated

In view of the above relevant para, plans and sections should be suitable modified.