ANNEXURE

SCRUTINY COMMENTS ON DRAFT REVIEW AND UPDATION OF MINING PLAN OF DHARMAPUR IRON ORE MINE, M. L. NO. 2309 OF M/s ZEENATH TRANSPORT COMPANY, OVER AN AREA OF 36.42 HA AS PER LEASE DEED/ 38.50 HA AS PER CEC. IN VILLAGE RAMGAD, SANDUR TALUK OF BALLARI-DISTRICT, IN STATE KARNATAKA. SUBMITTED FOR APPROVAL, UNDER RULE 17(1) OF MCR, 2016. RAMGAD RESERVED FOREST, CATEGORY OF THE MINE IS A-OTFM (I.E. MECHANIZED).. FOR THE PERIOD 2020-21 TO 2024-25, MINE CODE IS 30KAR03055, REGISTARTION NUMBER IS IBM/1010/2011.

COVER PAGE

- The category of the mine is given as A(OTFM-other than fully mechanized mine), now the category is required to indicate as A(Mechanized), instead of A(OTFM). In the light of the above remarks, the text and the plates may be attended, wherever applicable.
- 2. In the introductory part, the document submitted for five years period, from the previous approval to the present submission, whatever the changes that is incorporated in the present document may be indicated for easy reference. Besides, what is the reason for not submitting this document as per rule 11(4) of MCDR, 2017 may be justified? The rule is reproduced here (The holder of a mining lease shall submit the mining plan to the competent authority for review at least one hundred and eighty days before the expiry of five years period for which it was approved on the last occasion, for mining operations for a period of five subsequent years.).
- 3. The list of annexures furnished in the text, which must be added with another column to give number of pages in each annexure for clarity. The annexures must be given with date and validity also in each annexures as applicable, including the approved mining plan/ scheme etc. Name of the mine with lessee need to be given in all the photographs. The annexure photographs enclosed is not appropriate, better attach another photographs for reef workings with common boundary and the float areas, dumps, stacks and other infrastructure.
- 4. Table no.2 reveals the list of ML held by the lessee, in which ML. No. 2239, already the block has been auctioned and the successful bidder declared, if it is so, in the remarks, it should be indicated accordingly.

Part-A

- 5. Para 1(e), under future exploration programme, only two bore holes were proposed for the year 2020-21 along the common boundary workings within the insitu reef ores, in addition to the above proposals, two more bore holes may be added parallel to the present two bore holes to understand the geology beneath and also the continuation of ore body from the float ores area, taking incline bore holes, to know the lateral and depth wise extension of the ore body.
- 6. Para 1(J), under mineral reserves/ resources, mentioned that the based on the exploration carried out in the ML area, the estimation of reserves/ resources considering the threshold value prescribed by IBM i.e +45% Fe & +35%Fe for siliceous ores, but in the table details furnished in page no.27, reveals mainly n +45%Fe to 63.56%Fe. What happened to the siliceous ore of +35% Fe indicated above and the quantity considered under siliceous ore were not briefed. Similarly, the table no.16 in page no.29, were presented without giving the method adopted to arrive the average grade of iron ore for the clarity.
- 7. Para 2A (a), the details of the number of working benches height, width, slopes, waste dumps, stacks and infrastructures, etc. Further, the slope of faces, direction of advancement, approach to the faces & specification of roads, etc to be marked.
- 8. Para 2A(a), under proposed method of excavation, the sections proposed from B-B' to E-E' to work only float is agreed, but the work begins from the B-B', which is attached with the reef ores, so

partly working with reef also in the beginning of the proposed five years may be re-considered along with the floats to be appropriate. (ii). The details of the proposed mining pit of plan period may be modified, as per the above comments and also in other places of the ext and the plates.

- Para 2A(b), and the table no.17 & 18 may be attended in line with the remarks given in the above paras.
- 10 Para 2AII, under dump re-handling, it is given nil, whether there is no chance of re-handling in the present period of five years or permanently there is no chance of re-handling because of no waste dumps/ stacks reveals any existence of the ore materials for recovery, if so, should be dealt.
- 11. Para 2A (d), under brief description of the proposed method of working, this para need to be attended and worked keeping the above comments offered in the sl.no. 8, wherever applicable.
- Para 2(e) need to be attended in line with the remarks given above in para 2A, as applicable.,
 table nos. 20/21 need to be attended.
- 13. Para 2(e), under conceptual planning, need to be attended and modified, wherever applicable based on the remarks given above.
- 14. In table no.22, under land use pattern, the unused area in the beginning of the plan period is given as 14.606 ha, whereas in the conceptual stage it is mentioned as 5.976 ha area, how this has been reduced to 5.976 ha may be explained.
- 15. Para 4, under stacking of mineral rejects, table no.27A, below given a note that the back filling is proposed in float worked out area is accepted, but not specified from when this proposals will be implemented and from which locations, what is the authenticity of barren ground below the float working, etc., need to be ascertained on the mineral conservation point of view. In the light of the above remarks, the other related paras need to be attended suitably. (ii). The table no.28, wherein the back filling proposals drawn, from 1st year onwards, instead of that the proposals may be drawn from the 2nd year of the five years periods from 2021-22 onwards, since the mine is going to produce less.
- 16. Para 8.3.2, under mined out land, in table no. 36, mined out area at the beginning in Ha is given as 7.73 ha area till the period of 2023-24, besides you are proposing 0.2 ha area for back filling, which is not showing in the appropriate column. Also, the 7.73 ha area as mined out area is not appropriate, this should be indicated degraded land/ or under mining, but not mined out, only in the mined out area only the back filling is applicable. The table need to be attended accordingly.
- 17. Para 8.6, under financial assurance, the category mentioned as A (FM), in place of that A (Mechanized) need to be changed, even for this category the rate is same. Besides, the BG validity given as 4/10/2020, already submitted, if so the validity of the BG should be changed to the document validity i.e up to 2024-25 respectively.

Part-B

- 18. The certificate enclosed by the lessee/ managing partner, in the consent letter, the name recognized is used in place of qualified persons.
- 19. Surface Plan: (Plate No. 3): (i). The pits, dumps, stacks etc., are must be depicted in the index/plan as per the standard notation given in the MMR 1961. (ii) The notation used for drilled bore holes in other ML area is irrelevant, not necessary to show for this area. (iii). The view point located in the ML area need to be relocated or removed from the mineralized locations.

- 19. Plate No -4 (Geological Plan): (i) The plan may be as per rule 32 (1) (b) of MCDR 2017. (ii). UPL in the plan and the ultimate pit slope in the sections must be attended appropriately, instead of ultimate pit limit in both the plan and sections. (iii). The view point should be removed and all other stacks and dumps should be away from the Ultimate pit limit. The future exploration proposals may be attended with two more bore holes towards adjacent to the float workings.
- 20. Plate No.5 (Geological Cross sections): (i). The remarks given in the geological plan may be considered for geological sections, (ii). The UPL/ UPS, ultimate pit slope, indicated in the sections X-Y & C-C'are found to be not appropriate and correct. (iii). The geological sections drawn reveals incomplete geology at depth, from this it is clear, that the area requires some more exploration in the ML area to understand the depth of the ore body and also in the lateral extensions. Present presentation of geological sections is not appropriate, without few drilled bore holes. (iv). The sectional view of reef ore body shown is not appropriate and correct, this reveals an imagination and perfect, hence the bore holes is must to understated more of the reef ore body. Serious steps to be taken for undertaking the exploration through core bore holes.
- 21. Plate No -6A (Pit Lay out Plan / Production and developments Plan-2020-21): (i). The proposal should be drawn to work from top RL to the bottom RL and the direction of advancement of faces should be depicted accordingly on the plan. (ii). The approved production proposals of 36000t/ 0.036 million Metric tons/annum need to be maintained, till further changes from the CEC/DMG.(iii). Try to work in the reef area by moving the view point from the mineralized area and also from the UPL, to know the lateral/ depth wise extension of the ore body. (iv). In the light of the above scrutiny comments, the remaining four years workings, both the developments and production may be revised to work both reef ore body and the floats accordingly.
- 22. Plate Nos. 9 (Conceptual plan & sections): (i). The plan and sections should be prepared, considering what would be position of workings at the end of this plan period/conceptual stage must be visualized and brought out accordingly. (ii). In the 1st year plan period, better to avoid BF in the float area. Better to take up in the 2nd year onwards, after exhaustion of ore body at depth. (iii). The profile present during the conceptual stage must be brought out, instead of showing old topography. (iv). If there is a chance for water reservoir, it should be undertaken and brought out accordingly.
- 23. Plate No- (Reclamation Plan): (i). Back filling (BF) need to be undertaken only after exhaustion of ore body, without which no BF should be commenced. (ii). This plan should be prepared similar to conceptual plan/ sections, considering the BF i.e. reclamation & rehabilitations. (iii). current year BF need to be deferred based on my scrutiny comments.