SCRUNITY COMMENTS ON 'DRAFT REVIEW AND UPDATION OF MINING PLAN' IN RESPECT OF MALKHED LIMESTONE MINE (ML NO. 1684) OF M/S SRI BALAJI CEMENT & POWER LIMITED, OVER AN AREA 64.73 HA. SITUATED IN MALKHED VILLAGE, SEDAM TALUK, KALABURAGI DISTRICT OF KARNATAKA STATE.

- a. All the headings, subheadings and para nos. should be replicated as per the standard guidelines as given in "IBM Manual on Appraisal of Mining Plan 2014 in an orderly manner.
- b. Repetitions may be avoided by giving reference to para no. & page nos.

COVER PAGE

- 1. The name of the document may be corrected as "Review and updation of Mining Plan including Progressive Mine Closure Plan" (submitted for approval under Rule 17(1) of MCR, 2016 & under Rule 23of MCDR, 2017) in all paces in the text and plates.
- 2. Grant of Mining Lease & expiry of the lease as per lease deed may be given. Expiry date of 01.08.2030 may be supported by the extension letter issued by DMG, Govt. of Karnataka.
- 3. Under Category it is to be mentioned as A (Fully Mechanised)/Opencast/ Public limited company/Non Forest/ Captive on the cover page

INTRODUCTION

4. State wise leases already held may be given as per the format given below:

Lease reference no. & date	Area	Postal address/Location	Type of Mineral	Working/Non working	Status of approval of mining plan	Date of execution and Date of expiry	Remarks

- 5. Para 1(a): In this para, the details like phone no., Fax, Mobile No and E-mail ID of the Managing Director/Nominated Owner may be given.
- 6. Para 1.0(c): This para is applicable only for fresh grant, hence Nil may be given

DETAILS OF APPROVED MINING PLAN/MINING SCHEME

7. Para 3.3: (i) Year wise review of exploration, production & development, reclamation etc. may be given in the appended table.

Year	Proposal	Actual	% of deviation	Remarks/Reasons

- 8. Para 3.4: Details of the violations pointed out by IBM may be given with their compliance status.
- 9. Para 3.5: Since the said document is submitted for RMP, Not applicable or no modification proposed may be given.

PART-A: GEOLOGY & EXPLORATION

- 10. Para 1.0 (e): (i) In this para the dimension of the pits & trenches carried out for prospecting/exploration may be given and not the dimension of the mining pits.(ii) The exploration carried out in the past may be summarized in a tabular column giving the year of exploration, type ,grid interval, bore hole ID Nos., their location ,collar level, depth and inclination.
- 11. Para 1.0 (i): As per Rule 12(3) of MCDR, 2017, requires detailed exploration (G1 level) to be carried out over the entire potentially mineralised area under the mining lease, within a period of five years from the date of opening of the mine. The same may be ensured and future exploration may be proposed.
- 12. Para 1.0 (j): (i) The area under G-1, G-2, G-3, G-4 & non-mineralized may be given in a tabular form based on the exploration carried out in the past. The same may be shown in the Geological plan and sections as well. (ii)The reserves/resources may be re assessed/ estimated based on the level of exploration carried out in the past. The same may be updated as on 01.03.2020 (Table no.13).
- 13. Para 1.0 (k): (i) Heading may be corrected as per the standard guideline. (ii) Section wise detailed calculation of reserve/resources may be given in this para read with comment no.14 including blocked reserves/resources due to nala & plant area. (iii) Unnecessary information's may be deleted from this para.
- 14. Para 1.0 (l): (i) Geological reserves as on 01.03.2020 may be furnished in Table no.15.(ii) The threshold value of Limestone (CaO%) may be corrected at all places in the document.(iii) During site inspection it was observed that there was no substantial amount of interstitial clay to consider 90% recovery & 10% mining losses for estimation of reserves & resources. The same be corrected at all places in the text & plates and 100% recovery may be considered for estimation of reserves & resources.(iv) The ultimate pit limit in the proposed plan period may be specified in mRL. (v) Table No.16 may be reworked and updated reserve position may be given as on 01.03.2020.

MINING

- 15. Para 2.0(a): The existing details of OB dumps, their status indicating the location ,quantity, area covered and other details may be enclosed in a tabular column. (ii) The existing details of Mineral stock lying in the mines may be given in a tabular column indicating the location, quantity, area covered and quality.
- 16. Para 2.0(b)(I): (i) Table no.17 may be given in tonnage. (ii) Separate table for Bulk density & recovery of each material handled may be given for computing the tonnage along with supporting report. (iii)Insitu tentative excavation (table no.17) may be crosschecked & corrected accordingly including top soil & OB, mineral reject & stripping ratio. (iv) Un necessary information's may be deleted from this para.
- 17. Para 2.0(b)(II): Since no dump re handling is done for the purpose of recovery of mineral, Nil may be specified.
- 18. Para 2.0(c): Year wise, section wise calculations for the production & development with their location in the proposed plan period aligned with table no.17 may be furnished and brief description may be given. (iv)Extent of mechanization may be calculated based on the maximum volume handled in year.
- 19. Para 2.0(e): In this para discussion on site for disposal of Overburden, ground preparation, dumping inside/outside the UPL and dumping ground proved for absence/presence of mineral may be discussed.

- 20. Para 2.0(f): (i) Steps & measures proposed to be taken to reclaim the mining lease area including re-grassification at the conceptual stage of mining may be enumerated in brief. Few sections of the same may be enclosed as plates. (ii) Land use pattern at the end of lease period (Row no.2, 3, 4 & 13) may be reviewed & corrected at all places in the text.
- 21. Para 3.0(b): In this para, maximum & minimum depth of working in Mts & in mRL in the proposed plan period may be given.
- 22. Para 4.0(b): In this Para, it is to clearly state that the dumping ground is proved for absence of mineral supported by bore hole data.
- 23. Para 4.0(c): (i) Engineering Protective measures like retaining wall & garland drains may be given in tabular column year wise with their dimensions. (ii) Manner of disposal of waste, configuration and sequence of year wise build up of dumps & other details may be furnished in the appended table

ſ	Year	Dump	OB	Area in	No. of	Level in	Location	Slope
	rear	No	Quantity proposed	На	Stages	MSL, Top RL & Bottom RL	Coordinates	Angle
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- 24. Para 5.0(a): The information furnished in table no.29 & 31 for high grade & low grade may be reviewed.
- 25. Para 6.0(g): Activity wise breakup of the requirement of water may be given to form a water balance chart which includes water requirement for dust suppression, watering the plants, water for drinking & other purposes.
- 26. Para 8.0: In page no.56, it is given that sanctuary is located in the vicinity of lease hold. Details of the same may be given.
- 27. Para 8.2: (i) Area of land already degraded &land proposed to be degraded is not synchronous with the table no.27, 33 & 37.(ii) No table is furnished ,but mentioned as details are furnished in above table.(iii) Proposed specific mitigation measures may be described for reclamation & restoration of land, water quality & noise quality including ground vibration.(iv) Since this is an opencast mine, nil may be given under the subheading-subsurface subsidence.
- 28. Para 8.3: (i) A tabular column may be inserted for monitoring the environment parameters of air, water, noise & soil in the core & buffer zone with their respective locations and no of samplings proposed in core & buffer zone.(ii) In the table of year wise a forestation, details like survival rate, area covered, species proposed to be planted & cost may be given.
- 29. Para 8.3.5:All the details with respect to dump management may be given in summary of year wise proposals during the plan period
- 30. Para 8.5: (i) FA table may be given as per the standard format. (ii) Area for storage of top soil, Overburden dump & mineral storage may be reviewed & corrected.

31. **PLATES**:

a) Key Map (Plate No.1): (i) this plate may be submitted in colour and on a larger paper. (ii) Approach road to the mining lease area may be given. (iii) Human settlement surrounding the mining lease area may be tabulated. (iv)Environment monitoring of air, water & noise may be marked in core & buffer zone as per comments placed at point no.28.

- b) Surface Plan (Plate No. III): (i) All the features including OB dumps & mineral stock may be shown and indexed properly. (ii) Surface plan is to be signed by the surveyor with date.
- c) Geological Plan (Plate No. IV): (i) Area under G-1, G-2, G-3 & G-4 may be shown prominently with thick lines & indexed accordingly. (ii) The position of the seasonal nallah is different in surface plan & geological plan. The same may be corrected. (iii) Year wise proposal of exploratory boreholes may be shown with different colours as per comments placed at point no.11.(iv) Geological plan is to be signed by the surveyor with date.
- d) Geological cross sections (Plate No. V): (i) The sections may be redrawn based on the comment placed at point no. 12(ii). (ii) All the features falling on the respective section line like dumps& mineral stack may also be depicted. (iii) Proposed boreholes in the plan period may also be marked on the respective section line. (iv)Geological cross section is to be signed by the surveyor with date.
- e) Production & Development Plan (Plate No. VI A- VI E): (i) Top & bottom RL of each of the benches moved may be shown clearly & direction of movement be marked. (ii) Sufficient distance between the Development bench & mineral bench is to be maintained and shown in the plate. (iii) Environmental protective measures like retaining wall & garland drain may be shown & indexed.
- f) Year wise production & development section (working) including proposed dumping area, UPL in the plan period may be given in a separate sheet.
- g) Financial Assurance Plan (Plate No. VII): Detailed break up of Land Use Pattern (only outline) of pit, dump, Infrastructure, Green belt, road, unused area etc. to be given in different colour coding & indexed accordingly.
- h) Conceptual Plan & sections (Plate No. IX): (i) Conceptual plan & section (only outline) is to be made considering the end of the life of the mine including re grassification, aligned to comments placed at point no.20. (ii) The land use table at the conceptual stage of mining may be inserted in this plate.
- 32. Annexure: Following items are required to be annexed with the document:
- a) Consent letter/Undertaking /Certificate from the lessee & Certificate from QP may be given per the standard format.
- b) Few environmental monitoring reports of air, water, noise & soil may be annexed.
