

**Scrutiny comments on Examination of Draft Review & updation of Mining Plan including Progressive Mine Closure plan in respect of Subbarayanahalli Iron ore Mine (ML No. 2629) of Karnataka State Minerals Corporation Limited over an area of 80.06 Ha (as per CEC) Sandur, Bellary District of Karnataka State.**

**Introductory Note**

1. Pg. no-3: It mentions "Review and updation of Mining Plan for next 5 year period (2020-21 to 2024-25) under Rule 17(3) of MCR 2016 is prepared and submitted". This should be corrected as under Rule 17(2) of MCR 2016.

**1.0 General**

2. **The Chapters and paras of the document should be revised as per universal format.**
3. Para-1(b) Pg-(4)- It mention " The Company authorised Sri. Shankaralingaiah, CGM to sign the Mining Plan" whereas in the authorisation certificate, Sri Shankaralingaiah, DGM(P) is mentioned. This should be checked and corrected.
4. Mineral(s) which are included in the letter of intent/Lease deed is not mentioned. It should be included.

**2.0 Location and Accessibility**

5. Para-2(a) Pg.-(5)- Table no-4 should include the Email-id details.
6. Para-2(b) Pg.-(5)-The Location map shows existence of railway line and road nearby lease area. The details should be mentioned in the table for details of Lease area.

**3.0 Details of approved mining Plan/scheme of Mining (if any)**

7. Table no 10: Pg 11: The EC validity is mentioned till 12.04.2049. The EC copy mentions date of 9/6/2009. As per MOEF notification dated 14/9/2006 the EC validity for mining project is 30 years. This should be checked.
8. Para 3.4 Pg-(12) status of compliance of violations pointed out by IBM (Pg.12)- The violation pointed out by IBM vide letter no. KNT/BLR/Fe-375/BNG-V/864-866 dated 2/12/19 and its compliance status has not been given. This should be included.
9. Para 3.5 Pg.(13)- Hon'ble Supreme Court order dated 07.12.2017 regarding construction of belt conveyor system should be mentioned here. The CEC letter regarding enhancement of permissible limit also states setting up of conveyor system for evacuation of iron ore where MPAP exceeds 1 MMT. The complete case and the current status should be mentioned here.

**PART-A**

**1.0 Geology and Exploration**

10. Para. -1(k) –Pg. (26)-Reserve estimation by cross sectional area method-Table no 19 shows proved reserve figure as 68972483 tonnes where as in Table no 15 it is mentioned 68972484 tons. Both tables should be checked and figures be uniform.
11. The Proposal for exploration in G-2 level for the entire lease area, during the proposed Plan period should be included in this section.

**2.0 Mining**

12. Para-2(a)-Waste handling Pg. (31): PTD-1 dump is proposed in the western side of lease area for plan and conceptual period waste dumping, whereas in all the related plates for production and development plan (Plate 5 to 5D) Temporary Dump 2 is mentioned. This should be checked and corrected.
13. Para-2(b) Pg.-(32-35)- "Saleable" to be replaced with iron ore production. Also, in Pg. no-(34-35), third year, fourth year & fifth year development & production, average ore to overburden ratio is mentioned as 1:0.07, 1:0.17, 1:0.30 (in cum). This should be corrected as mentioned in Table 24. i.e. 1:0.08, 1:0.18 & 1:0.31(in cum). Also, in Pg-34(d) & Pg-35(e) the total area 16.40 ha for 1st year mining operation & the total area 13.38 ha for 1st year mining operation respectively is mentioned which should be corrected to 4<sup>th</sup> year mining operation & 5<sup>th</sup> year mining operation respectively.

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14. Para 2(II)- II Pg-(36)-Salient features of the proposed method of working-Bench slope angle may also be added here. Drilling-a)-Pg (38)- The quantity of excavation which required blasting is (1340000+234111) X30%. The text should be corrected accordingly. Pg.39. mentions "The total material shall drilling & blasting" which should be corrected as "Drill requirement annually".  
(I)Individual year wise development plans and sections-Pg. (36)- The sl. No of this para should be corrected as (c) and also the heading contents as per the universal format.  
(II)Describe briefly salient features of the proposed method of working-Pg.(36)- The sl. no of this para. should be corrected as (d) and also the heading contents as per the universal format.  
(III) (Pg-43)- The sl. no of this Para should be corrected to (e) as per the universal format. In the disposal of overburden/waste (Pg. 44) section dumping is proposed in PTD-1, however as already communicated above, in all the related plates for production and development plan (Plate 5 to 5D) Temporary Dump 2 is mentioned. This should be checked and corrected.
15. Para 4.0- Stacking of Mineral/subgrade and disposal of waste Pg. (50)-Its mentioned "The waste of 0.679 million tonnes likely to be generated in this plan period for the production of 66.99 million tonnes i.e. 2020-21 to 2024-25". This should be corrected to 6.699 million tonnes.  
b) & c) Pg. (51-52)-Sub paras of this chapter should be as per universal format.  
Table No-49- As per table no 49, the bottom most R.L for the proposed dump (PTD-1) is 1043 mRL. and topmost is 1085 mRL. according to which the dump height will be 42 meters. As per the Environmental clearance conditions (xxii), the maximum height of dump shall not exceed 30 m, each stage shall preferably be 10 m and overall slope of the dump should not exceed 28 degrees. The above is not in compliance to the EC conditions. The dump should be redesigned for the proposed period, taking into all the parameters of EC conditions.

**Progressive Mine Closure Plan**

16. The Proposal for grassing/plantation during the proposed plan period for the finally mined out areas should be included, as per the recent Hon'ble Supreme Court order.
17. Para 8.1- Environment base line information: Table 52 mentions 49.29 ha (Existing) under Mining Pit whereas in table no 45 its mentioned 49.49. This should be checked and corrected.
18. Para 8.2-Mitigative measures. Pg. (64)- "drilling patron" may be corrected as "drilling pattern and "Charge for delay" may be corrected as "Charge per delay".
19. Para 8.3.1-Mined out land- It is mentioned "During plan period of two years there is no possibility of back filling". This should be corrected as plan period for five years.  
Table 56 should be specifically mentioned year-wise with Location, proposed saplings, & area etc.  
Table-57 – The year-wise proposal shown does not complete the balance R&R work during the plan period 2020-21 to 2024-25. The table should be checked and corrected. Table 56 & Table 57 plantation figures also needs to be checked and corrected.
20. Para 8.6-Pg.(73)-Financial assurance- The additional area requirement during plan period should be rechecked after incorporating the aforementioned comments related to waste dump site, progressive reclamation plan etc. and financial Amount calculation should be made accordingly.

**Part-B**

21. Para 9.0-Certificate/undertaking/consents- Under Rule 17(3) of MCR 2016 to be corrected as under Rule 17(2) of MCR 2016. An additional undertaking from the lessee stating that the time bound implementation of CEC approved Reclamation & Rehabilitation plan and monitoring /maintenance of the protective measures already implemented, should also be incorporated under para-9. The compliance/condition of C-COM circular no 2-2010 should be mentioned here. The consent letter to be corrected as per the universal format.

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22. Certificate from QP- The “place” at the left-hand side of signature is found blank in the certificate. It should be filled.

**Annexures:**

23. Annexure-13- The violation pointed out by IBM vide letter no. KNT/BLR/Fe-375/BNG-V/864-866 dated 2/12/19 should also be annexed along with compliance thereof.

24. Annexure-22- The R& R implementation status report does not have any authorised signature. The authorised signatory signature should be put.

25. Memorandum of association for the Company to be added in list of annexures.

26. All the Annexures should be provided Pg. No. and the page no to be added in the List of annexures index.

**Plates:**

27. A plan should be enclosed in support of compliance of CCOM circular No- 2/2010(DGPS Plan to be attached)

28. Plate-3-Surface Plan- The existing mine working dump should be clearly demarcated on the surface plan

29. Plate-4- Geological Plan- The section 1-1', A-A', B-B', C-C', D-D', E-E' F-F', G-G', H-H', I-I', J-J' is not marked in the plan. This should be marked. Also, UPL to be demarcated in the geological plan.

30. Plate-5,5A, 5B,5C, 5D- i) PTD-1 where the dumping is proposed for the plan period is not marked in the plates. The index in the plate shows Proposed Temporary dump-2. This should be checked and corrected. The above plates may also require modification w.r.t the proposed dumping area, as per the aforementioned scrutiny comment no 15. Also, in plate 5B, in the index the waste dump position at the end of 2021-22 instead of 2022-23 is mentioned. This should be corrected.

ii)The Geological lithology in the development plan and section should be similar to the lithology mentioned in Geological plan & section.

iii)Year-wise development plan & section should be submitted separately for each year.

31. Plate-6- The table showing details of proposed temporary dump volume after deducting the existing dump volume is not matching with table no 44. The table mentions 1137208.676 tonnes~ 1.13 million tonnes dump capacity whereas table no 44(Pg-47) and also other part of the text shows 1.89 million tonnes waste accommodating capacity. This should be checked and corrected. The above plate may also require modification w.r.t the proposed dumping area, as per the aforementioned scrutiny comment no 15.

32. Plate-7(Land use plan),8 (Environment plan, & 9 (Reclamation plan)-. - This may be checked w.r.t aforementioned scrutiny comments 15 & 20 and modification/Corrections should be incorporated.

33. Plate-10 & 10A- (Conceptual plan & Section)- The proposed dump yard and the proposed settling tanks colour shown in the index needs to be checked and corrected as it is not matching with the plan. Also, the infrastructure area like crushing plant, workshop, adm. building, weigh bridge etc should be clearly mentioned in the plan.

34. Plate-11- (Financial area assurance plan)- The table shown in the plate and table no 59 (Pg.73) does not match. The Land particulars mentioning (Others (to specify) there is difference in area (25.28(plate)/23.52(table).

**Cover Page**

35. The cover page of the document should mention “Review and updation of Mining Plan (submitted for approval under Rule 17(2) of MCR 2016) including Progressive Mine Closure plan (submitted under Rule 23 of MCDR 2017).