

**SCRUNITY COMMENTS ON DRAFT MODIFIED MINING PLAN IN RESPECT OF KAREKURCHI MANGANESE ORE MINE (ML NO. 2248) OF M/S JAYARAM MINERALS, OVER AN AREA OF 11.74 HA, SITUATED IN KAREKURCHI VILLAGE, TIPTUR TALUK, TUMKUR DISTRICT OF KARNATAKA STATE**

**NOTE**

- 1. In view of Gazetted notification from the Ministry of Mines dated 10/02/2015, 'clay' has now been declared as 'minor mineral' and this office cannot process the document in respect of 'clay' under the provisions of principal MM(D&R) Act, 1957 and MCDR-1988. Hence this document should be submitted to IBM for the mineral of 'manganese' and accordingly reserve/ resources, production and other proposals may be given for manganese only.***
- 2. Estimation of manganese reserve is not found to be furnished as per UNFC; the same is required to be re-estimated in light of existing manganese pit exposure and trial pits. Enhancement of manganese reserve, if any, should be justified by additional exploration.***
3. Since life of the ML is extended up to 30.09.2021 (i.e. 50 yrs. from the date of original grant) in view of MM (D&R) Amendment Act- 2015; a copy of original grant of ML is required to be enclosed with the document.
4. Boundary pillars are not found to be erected as per the guidelines prescribed in Rule 12 (1) (v) of MCR- 2016, the same should be constructed accordingly.
5. In many places of the document 'Scheme of mining period' may be corrected as 'Modified Mining Plan period'.

**COVER PAGE**

6. Name of the mine may be mentioned in the cover page as: Karekurchi manganese mine.
7. Modified mining Plan period may be corrected as from 2016-17 to 2020-21.
8. Address and contact nos. of the qualified person may be removed from the cover page.
9. Undertaking & certificates are not found signed by the Lessee, except the consent letter. No certificate is enclosed by the Qualified Person.

**INTRODUCTION**

10. Date of first grant of the ML, date of commencement and present status of mining operation, subsequent renewals, reference of last approved mining plan, status of other statutory clearances, specific orders / guidelines or notifications received from the regulatory bodies time to time pertaining to this ML may be discussed in this chapter briefly.

**GENERAL**

11. Para 1.0 (a): IBM registration no. may be corrected.
12. Para 1.0 (b): Whether the partnership firm is registered or unregistered; may be clarified. Details of the partners and name of the managing partner should be mentioned here.
13. Para 1.0 (f): As per Rule 15(1) of MCR, 2016 a qualified person should have a degree in mining engineering or a post graduate degree in Geology with professional experience of minimum five years of working in a supervisory capacity in the field of mining after obtaining the degree. Accordingly copies of relevant educational qualification, professional experience certificates and photo identity proof may be enclosed.

### LOCATION & ACCESSIBILITY

14. Para 2.0 (a): Latitude & Longitude of any boundary point should be furnished here, identification no. of the pillar may also to be written. Postal address of the lessee is not matching with para 1.0 (a), may be corrected accordingly.
15. Para 2.0 (b): No discussion is given on 'existence of public road/ railway line' with apprx. distance from the ML area.

### DETAILS OF APPROVED MINING PLAN

16. Para 3.2: No modified Mining plan was approved by IBM in previous occasion dated 10.05.2015; hence this relevant para may be furnished as: Not Applicable.
17. Para 3.4: Date of inspection from IBM, date of issue of violation letter and compliance status by the lessee of aforesaid violation should be furnished. Copy of the violation letter and reply from the lessee should be enclosed as annexure.
18. Para 3.3: Review of production details should be furnished in accordance with approved Mining Plan.
19. Para 3.6: It is to be mentioned in this para that modified Mining Plan is submitted under Rule 17(3) of MCR-2016 since life of the ML is extended up to 30.09.2021 (i.e. 50 yrs. from the date of original grant) in view of MM (D&R) Amendment Act- 2015.

### PART-A

20. Para 1.0 (c): Since life of the ML is extended up to 30.09.2021 and subsequently modified Mining Plan is submitted for approval for the extended period of the ML, detailed description of geology of the ML area should be furnished in this para.
21. Para 1.0 (d) (ii): E mail ID of the lessee should be furnished in accordance with submitted Monthly and Annual Returns under Rule 45 of MCDR, 1988.
22. *Para 1.0 (e): During the course of site inspection dated 29.06.2016, it is found that 7 trial pits are dug by the lessee in the manganese mineralised area, dimensions and locations of the trial pits should be furnished in this para in a tabular form. Copy of the analysis reports of 'manganese', obtained from the trial pits should be enclosed with the document, analyzed from NABL or similar accredited Laboratory. Expenditure incurred by the lessee for exploration (by trial pits) may be furnished.*
23. *Para 1.0 (f): In future programme of exploration; type of proposed boreholes, whether core or RC boreholes, may be specified. Production and development proposals should be removed from this para, the same information may be deliberated in appropriate places under 'Mining chapter'.*
24. *Para 1.0 (k): Reserve & Resources should be furnished in respect of manganese mineral only, a feasibility report may be enclosed duly indicating recent exploration, re-estimated reserve and proposed production.*
25. *Para 1.0 (l): Section-wise estimation of reserve (for manganese) is not found in accordance with UNFC. Reserve and Resources should be re-estimated in view of recent exploration (by seven trial pits) and existing open pit exposure. Geologically proved blocked ore resources (by bench slopes and safety barriers) should be classified under UNFC Cat. 211. Date of estimation of resources may be furnished.*
26. Para 1.0 (m): During site inspection is it evident that entire manganese mineralised area is not either explored or exploited under G1 level of exploration. Hence, resources under different 'level of exploration' may be corrected accordingly in light of re-estimated Reserve/ Resources.

27. Para 2.0 (A) (a): Proposed bench height and width should be specified for manganese pit; accordingly proposed individual pit slope and overall pit slope may be corrected.
28. *Para 2.0 (A) (I): In situ excavation proposals for manganese from 2016-17 to 2020-21, total ROM quantity is found to be exceeded than the furnished reserve (i.e. 142,299 cubic meter or 355,748 tonnes), which is not acceptable. Production proposals for next five years should be distributed in accordance with latest re-estimated reserve of manganese ore. Proposed production years are to be specified from 2016-17 to 2020-21.*  
It is to be noted that, as per definition, ROM constitutes the material excavated from mineralized zone and includes mineral reject and useable mineral component which includes sub grade also.
29. Para 2.0 (A) (II): Location of the waste dumps should be marked in the surface plan.
30. Para 2.0 (c): Proposed mine working layout, dumps and stacks are not found to be demarcated in the production and development plans from 2016-17 to 2020-21.
31. Para 2.0 (d): Extent of mechanization, details of proposed mining machineries with capacity and availability % should be discussed under this para. Year-wise 'total handling' should be justified with nos. of proposed machineries, utilisation and capacity.
32. Para 2.0 (f): All subject items pertaining to 'conceptual mine planning' are not found to be furnished. This para may be duly re-attended covering all subject items viz. latest available reserves resources, anticipated life of the mine in light of production, recovery of ROM, disposal of waste, backfilling of voids, reclamation and rehabilitation.
33. Para 4.0 (a): Proposed generation of mineral reject are not matching with the proposed ROM production of manganese as mentioned in page 30, please clarify. Stacking area for mineral reject is not found to be demarcated in Production and Development plans.
34. Para 4.0 (c): Nos. of dump present in the ML area with extent and height may be furnished in this para in a tabular form. Year- wise proposals of environment protective measures like construction of retention wall along the toe of the waste dump, construction of check dams and settling tanks should be given. Proposed engineering dimension and nos. to be built may be clearly mentioned in accordance with para 8.3.1 (refer Page no. 45 to 50).
35. Para 5.0: Details should be furnished in respect of manganese mineral only.
36. Para 8.6: In Financial Assurance table, no additional area is found to be identified for disposal of 'mineral reject/ sub-grade' manganese ore, accordingly 'net area calculation' may be corrected. Copy of valid Bank Guarantee should be enclosed with the document, valid up to 31.03.2021.

## PART- B

37. Para 9: Undertaking & consent letters should be duly signed by the Lessee/ Managing partner. Certificate of the Qualified Person is not found to be enclosed with the document.
38. **Para 10, PLATES:**
- a) *Surface Plan (Plate no. II a): Working pits, dumps, existing roads are not found to be updated in the surface plan. Existing RL is not found to be mentioned for the working benches. Name, registration no. and signature of the surveyor prepared the plan is not given. Waste dumps and mineral stacks should be duly numbered in the plan. Geological legends and proposed boreholes should be removed from the surface plan.*
  - b) Geological Plan (Plate no. II b): Explored 7 nos. of trail pit locations should be furnished in the Geological Plan. Legend of proposed boreholes may be corrected. Levels of exploration (viz. G1, G2 or G3) as per UNFC are not marked in the plan.

- c) Geological Sections (Plate no. II c): UNFC codes are not furnished in the Geological sections. Thickness of the manganese ore body along the sections shown in arbitrary manner. As of now, proved thickness of the ore body for reserve calculation should be extrapolated from existing pit exposure and depth of the trial pits, accordingly sections should be corrected and reserve/ resources to be re-estimated.
- d) Production and Development Plans (plate nos. III a to III e): Proposed areas for manganese ore mining, waste dumping, ore and sub-grade stacking is not found demarcated in the plans. Year-wise proposals of environment protective measures like construction of retention wall, garland drains, check dams etc. are also to be demarcated in the plans.
- e) Conceptual plan (Plate no. 11): Tentative outlines of final working pits, waste dumps, afforestation, reclamation and rehabilitation measures at end of the life of the mine should be demarcated in this plan. All geological legends should be removed from this plan.
- f) *'Reclamation Plan' and 'Financial Area Assurance Plan' are not found enclosed with the document.*
- g) *'Progressive Mine Closure Plan' should be removed from the document.*

39. **Para 11, Annexure:** Any type of stamping and signature of the Qualified Person (except for reserve/ resource calculation table and feasibility report) should be avoided in the annexures. Following items are required to be annexed with the document:

- a) Original lease deed copy (for first grant) indicating date of grant.
- b) Copy of the photo identity card of lessee with permanent address proof.
- c) Copy of violation letter/s received from IBM and subsequent reply from the lessee.
- d) Re-estimated section-wise reserve & resources calculation
- e) Copy of the analysis report of manganese ore, obtained from the trial pits (minimum 10% of the total collected samples), analyzed by NABL/ other Govt. laboratory.
- f) Feasibility report of the deposit.
- g) Copy of Latest season environment monitoring data.
- h) Copy of identity proof, qualification and experience certificates of the qualified person.
- i) Copy of valid Bank Guarantee, valid up to 31.03.2021.
- j) Few photographs of mine pit, waste dumps and mineral stacks.
- k) A letter of undertaking from the lessee stating that no matter is pending in the lease hold area on the following issues:
  - Related to illegal mining with State Govt.
  - Royalty and revision matter with the State Govt.
  - Safety & Environment issues of general public concern
  - Public Interest Litigation (PIL) & court cases, etc.
 This may be submitted **in original** to this office & copies to be annexed with the document.

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