SCRUTINY COMMENTS ON THE MINING PLAN OF VIBHUTI GUDDA IRON ORE MINE OF M/S VIBHUTI GUDDA MINES PVT. LTD., OVER AN AREA OF 55.00 HA AS PER THE LEASE DEED &55.00 HA AS PER THE CEC SKETCH, M.L. NO.2469, IN VILLAGE BELAGAL, BALLARI TALUK, IN BALLARY DISTRICT, KARNATAKA STATE.SUBMITTED UNDER RULE 16(1) OF MCR,2016. CATEGORY OF THE MINE IS A (FM-FULLY MECHANISED MINE, THEPROPOSED DOCUMENT PERIOD IS FROM 2014-15 TO2018-19, (BUT EFFECTIVE DATE FROM I.E. AUGUST'16 TO 2018-2019).

COVER PAGE

- 1. The document should be submitted under rule 16(1) of MCR, 2016 and not under rule 12(2) of MCDR, 1988, with the latest amendments. In the light of the above remarks, the whole text and the plates need to be modified, wherever applicable.
- 2. The extent of the area is given as 55.00 ha, which need to be indicated as per lease deed & as per CEC sketch. The ML number is not written. The name of the qualified person prepared the document must be indicated.
- 3. The Online registration number of the company may be indicated.
- 4. The validity of ML period as per the MMDR, amendment Act, 2015 must be indicated.
- 5. The ML area falls under Bellary reserve forest, instead of indicating as reserve forest, it is mentioned as just forest land.

GENERAL

- 6. In the consent letter, the letter signed by the owner, wherein the document submitted indicated as Rule 24A of MCR, 1960/12 of MCDR 1988, but in cover page, it is given as rule 12 of MCDR, 1988, are not appropriate. The qualified person prepared the document must be careful in preparing the document, by indicating appropriately the rule position, instead of reflecting wrongly. The RQP certificate number indicated must be deleted. In the light of the above remarks, the text para must be attended, including the plates, wherever applicable. In the future, the word Recognized qualified person must be replaced with qualified person. The contact number/ mobile email & fax number of the qualified person has not indicated.
- 7. The list of annexures, given in table format, must be added with number of pages, in each annexure may be indicated for easy reference.
- 8. Instead of just mentioning state Govt., in the annexures letter, the topic/ content of the respective letter may be given in short.
- 9. Annexure-6, pertains to the RQP, must be replaced with qualification and the experience certificate of the qualified person for the proof of his competency as per rule 15(1) of MCR, 2016.
- 10. Irrespective of photographs of the mine, infrastructure, etc., may be written with names for clarity and easy reference.
- 11. The annexure-17, should be enclosed in the mining chapter para, instead of placed in annexure side.
- 12. In para 1, the introductory part, though the reason for submission of document is indicated, is not appropriate. Besides, the ML period expired on 6.4.2014, forthwith, lessee did have approved mining plan for 2014-15 & 2015-16, which is not. The lease period extension as per MMDR, amendment Act, 2015 is not specified, in addition to that, the reserve part is not dealt, if the reserve remains the same as per the previous approved documents, it should be emphasized, that there is no change in the reserve part and the previous document is approved letter No. 279/219/1990/BNG/2015 dated on 25/8/2014.Now the document is submitted separately for the ML.No.2469.
- 13. In para 1(f), it should be written as qualified person under rule 15(1) of MCR, 2016. In the light of the above remarks, RQP & recognized must be removed, the text and the plates need to be attended, wherever applicable.

- 14. In para2(a), the lease period, mentioned upto 6/3/2014, but the lease period extended as per MMDR Act Amended 2015 is not indicated. In the light of the above remarks, the same should be attended, wherever applicable.
- 15. In para 3.1, the details of approved mining plan/ scheme of mining, approved upto 2006 period only indicated, but the last document approval, dated 25/8/2014 is not indicated, which ought to have been and later withdrawal other details may be given.

PART-A

- 17. In para 1(i), under future exploration, it is given, mineralized/ lease area already explored as per the ministry guidelines, but from the geological plan, the bore holes drilled to assess the reserves/ resources reveals only along the strike directions only, which is not appropriate and correct. At least, few exploratory bore holes could have been drilled away from the strike directions, width and the dip of the ore body at depth to ascertain the ore body with clarity.
- 18. In para 1(I), in table-12, the updated reserve/ resources as on 15.05.2014 is indicated, instead of the latest date 1.4.2016. In the light of the above remarks, the text and the plates may be attended, wherever applicable.
- 19. In para2A (a), it is given in table 13, the height of the bench is 9m & the width is 10m, but in para 2(c), it is given more than the height is not appropriate proposals, but it should be specified clearly. Besides, it is proposed mentioned during the mining scheme period, and in some para as plan period, etc., which should be attended and corrected suitably.
- 20. In para 2(b), in table-14, the financial year 2016-17 given need to be corrected as August, 2016 to March, 2017 and the production for the period from April to July may be deleted accordingly. The proposals for the year 2019-20 may be deleted, which will be submitted 180 daysbefore the expiry of this document. In the light of the above remarks, the text tables need to be corrected accordingly, wherever applicable.
- 21. In para 2(d), under drilling, it is given, average bulk density for both waste & ore is taken as 2.7t/m³ is not appropriate and correct.
- 22. In para 2(e), in page-34, under layout of mine workings, it is given, that the during the plan period, the mine is worked from 765m RL up to 747m RL with 3 nos. of benches, is found to be not correct, when the bench height of 9m each, similarly, in para 2A(a), table-13, working proposed from 880m RL as top bench and 756m RL is the bottom benches, developing 18 nos. of benches, each of 9m is also found to be incorrect. This needs to be checked and corrected in the text para and the plates, if applicable.
- 23. In para 2(f), under recovery of ROM, in page-36, it is given as 100%, this found to be not appropriate and the same need to be reconciled. Further, in the same page, under disposal of waste, it is stated that, we are proposing the dump area, outside the plan period pit limit, but within the UPL as temporary dump. The proposal found to be not appropriate and same need to be reconciled. Para 4(b) may be reconciled.
- 24. In table-19, the R & R proposals drawn is indicated, but in column-6, in 1st row, out of 248m dry rubble wall, 124m completed, remaining rubble wall completion period is not indicated, which must be.
- 25. In para3(b), under maximum & minimum depth of workings, it is mentioned that,in scheme period, RL reached at 747m and at the end of the conceptual period RL reached at 600m, reveals that as if the above RL reached to that level, which is not correct. The para need to be attended suitably.
- 26. In para5(a), it is given that the beneficiation plant will give an increment of 10v to 12% with blending of super high grade iron ore of 68 to 69% is not clear for understanding.
- 27. In para 7(b), under the manpower organization chart furnished without indicating the mining engineer, is not appropriate.

- 28. In para 8.3.1, under mined out land, it is expected to furnish, if there is any mined out land present in the ML area or not, which should be specified. Further, other details may be indicated.
- 29. In para 8.3.5, in table-33, the year wise proposals, should be specified with financial year, instead of mentioning 1^{st} year, 2^{nd} year etc.
- 30. In para 8.4, under financial assurance, the copy of the valid bank guarantee need to be enclosed.

PART-B

PLATES:

- 31. Key Plan (Plate No.1): The approach road to the mine needs to be marked on the plan, with approximate distance from the known place.
- 32. Surface Plan (Plate no.3):The position of three GCP's are not brought out in the surface pan, instead of showing separately as part plan. Besides, the working pit, non-working pit, similarly the active and inactive dumps should be numbered/ named for reference. The extent of the area as per ML deed & as per CEC must be written. The date of survey is written as 25.04.2014, which should be corrected and give the latest date. The certificate written be modified to the plan and sections prepared based on the lease map authenticated by the state Govt., instead of what is mentioned. The plan must be prepared and submitted as per rule 28(1) of MCDR, 1988. In the light of the above remarks, the all the plates must be attended suitable, wherever applicable, including the surface geological plan & sections, key plan and the Environmental plan.
- 33. Geological Plan (Plate no.4):The exploration undertaken in the past reveals only along the ore body/ strike length, in addition to that, few more holes should have undertaken on the southern side of the strike/ ore body to understand the behavior of the ore body at depth.
- 34. Geological section (Plate no.5): The UPL marked and notation given in the index part must be changed as Ultimate pit slopes, instead of ultimate pit limit. From the sections also it is clear that the exploratory bore holes were not placed appropriately, much reveals assumptions, considering the surface exposures, instead of ascertaining through bore holes, the behavior of deposits/ strata along the southern side, i.e. away from the strike line.
- 35. Pit Lay Out plan (Plate No.6A-2016-17): The proposals drawn to develop and produce iron ore for the year along the strike line, by developing benches towards southern end, between sections along D-D' and G-G', similarly for the year 2017-18, indicates inappropriate development, the development should be taken on both the sides of the strike line, all along and gradually attend to the top to bottom benches, so that the ore body will be exposed to the maximum and the production can be maintained. In the light of the above remarks, the remaining year wise pit lay out plan should be attended suitably for better development and production.
- 36. Conceptual Plan & Section (Plate No.9): The conceptual plan submitted, like surface plan without any change in the plan position after the end of the lease period working, i.e. 2019-20. However, there is a change in the conceptual sections, but the existing position of workings will not be seen at the end of lease period. Whatever the reclamation and rehabilitation work proposed to undertake need to be brought out in the plan as well in the sections.
- 36. Environment Plan is not submitted for the mine depicting the other ML area of other lessees if any present within the buffer zone, the name of the mine or the village for reference.