

SCCRUTINY COMMENTS ON REVIEW AND UPDATION OF MINING PLAN OF BANAWADI MAGNESITE MINE OF M/S SRI SOMESHWARA MAGNESITE MINERALS, OF ML. NO. 2530, OVER AN AREA OF 4.82 HA, IN BANAWADI VILLAGE, H.D. KOTE TALUK, MYSORE DISTRICT, KARNATAKA. SUBMITTED FOR APPROVAL UNDER RULE 17(1) OF MCR,2016 & RULE 23(B)(3) OF MCDR,1988. REVIEW PERIOD FROM 2017-18 TO 2021-22. CATEGORY-A(MECHANIZED), NON-FOREST LAND.

COVER PAGE:

1. The online registration number and the mine code to be mentioned. The proposed period should be mentioned as 2017-18 to 2021-22, i.e. up to 31.03. 2022). Besides, the document submitted for approval, under rule 17(1) of MCR, 2016 and 23(B)(3) of MCDR, 1988. In the light of the above remarks, the text and the plates may be attended, wherever applicable. Deemed extension period of ML from the date of grant as per amended MMDR act 2015 may be mentioned.

2. The category of the mine is A(Mechanized) and not A(OTFM). The document prepared by qualified persons followed by names should be given. The name of the partner Shri. B.P. Prasanna along with the M/s Sri. Someshwara Magnesite Minerals to be indicated.

3. List of annexures indicated should be given with additional information like, in annexure-No.1, the ML. No. 2530, annexure-01B, date of approval should be given. Environmental clearance up to which period. Annexure-2, RQP certificate should be deleted and replaced with qualification & experience certificate of both the QP's as per the rule 15(1) of MCR,2016. Annexure-3, should be enclosed in the main text part itself. Annexure-9, should be shown with pits, dumps, stacks and other infrastructure. The valid bank guarantee needs to be enclosed for Rs. 2 lakhs. Each annexures must be given with number of pages.

4. In list of plates, plate No.6, wherein only one composite development & production plan is enclosed, which must be separately for each year should be enclosed for respective financial year.

5. In the introductory part, the category of the mine quoted as A (OTFM), must be changed as per the scrutiny above and in addition the reason for not submitting the document for approval before this time may be explained. Whatever, the activities undertaken as per the previous approved document period may be dealt in brief, in addition to the review chapter.

6. The GCP's enclosed need to be indicated with ML. No., and the name of the mine and the owner. The GCP's must be of permanent structures. GCP-2 & 3 are not clear for understanding. Similarly the boundary pillars, must be attended, instead of furnishing without giving any details of the ML.

GENERAL

7. Para 1(b), the type of land given as patta land, but in other para it is given differently, also private land. Care should be taken given appropriately.

8. Para 1(e), recognised persons need to be replaced with qualified person, under rule 15(1) of MCR, 2016 must be corrected in place of 22C of MCR, 1960. In the light of the above remarks, the text and the plates may be attended, wherever applicable.

9. Para 1(f), the mobile number of the QP's must be given, instead of just land number.

10. Para 3.1, the details of the approved MP/SOM must be presented in tabular format, step by step each document.

11. Para 3.3, under the review chapter, (i) the proposed and the actual need to be dealt in table form for more clarity and with justifications, like how it is attended for development and the productions. However, the development & production table also not attended appropriately. (ii) The actual reasons for non-working has not been mentioned. (iii) No boreholes were drilled after last approval of SOM document as against proposals of 2 nos of DTH boreholes. The same may be clearly mentioned.

12. Para 3.4: The violation issued on 11/1/2016 for non-submission of ARs for year 2014-15. The action taken by the lessee regarding regular submission of MRs / ARs should be clarified with compliance report.

13. Para 3.6, the rules should be changed to 17(3) of MCR, 2016.

PART-A

14. Para 1(c): (i) Local geology may be discussed in brief with occurrence of Magnesite veins and their strike, width etc.

15. Para 1(e) (iv): The expenditure incurred towards exploration has not been mentioned.

16. Para 1(i): (i) Lateral extent area already covered under G-1, G-2 and G-3 level of exploration w.r.t. total mineralized area should be mentioned. (ii) The proposed exploration should be as per Minerals (Evidence of Mineral Contents) Rules 2015 with proposals of additional trial pits in less than 50 m grid intervals besides boreholes. Proposed boreholes should be core/RC depending upon the nature of deposit. (iii) The proposed expenditure likely to be incurred towards exploration should also be mentioned. (iv) The proposed exploration should be completed during year 2017-18 as per schedule of Ministry of Mines' guidelines. (V) The proper justification has not been given for non-proposal of any exploration in SE part of ML.

17. Para 1(j): The reserves and resources figures as on 1/4/2013 (111- 189,992 tonnes and 221-121,036 tonnes) as per last approved SOM document may be mentioned.

18. Para 1(l): (i) Sub-paras (a) to(c) have not been discussed as per Universal format. (ii) Foot note as per universal format may be incorporated below final reserves /resources tables. (iii) The mentioning of G-2 and G-3 exploration at page nos 18 to 21 may be removed to avoid repetition. (iv) Page No-22: Mentioning of Scheme of mining at Feasibility axis may be replaced as "Review of MP".(v) The costing table, Marketing table and Economic viability table mentioned at page nos 25 & 26 may be removed to avoid repetition as the same already incorporated at enclosed feasibility study report.

19. Para 2A (a), under mining chapter, existing and the proposed method of workings must be dealt step by step clearly, instead of clubbing together. The method of working is under category A(Mech), wherein machines and the manual labours may be allowed to use and not A(OTFM-other than fully mechanized), The approach road to the different benches also designed. Further, drilling and blasting proposal are also drawn, but during the field inspections of the mine, it is observed that the strata reveals medium hardness/ soft strata in nature, if it is so, proposals may be drawn, in case of hard strata, drilling and blasting if required will be taken. Further, the slope of faces, direction of advancement, approach to the faces & specification of roads, etc to be marked. Also, the existing dumps spread parameters, height, slope protective works etc., to be marked. The bench wise, mRL wise, opening reserves, exploitation and the closing balance should be furnished for the proposed periods.

20. Para 2(b), the insitu tentative excavation given in table, wherein the in column -3 the total excavation given, followed by in 5th column OB +Intercalated waste is given and 6th column ore recovery is given, if it is correct, than how the 7th column mineral rejects is again reported is not correct. This should be deleted. Further, in the below table, under dump handling, year wise handling given as 71,250 cum, recovery estimated of saleable materials of 17,810 cum is not correct and as such there is no waste dump present for re-handling. This may be deleted.

21. Para 2(c), the table/ para need to be attended in line with the scrutiny remarks given para 2A(a) & (b) respectively. Besides, the composite plan and section drawn for the five years period should be revised to make individual year wise plan & sections for the five years period may be given.

22. Para 2(d), need to be attended in reference to the previous scrutiny remarks.

23. Para 2(e): The mining proposals should be made to complete exploitation of minerals/ore up to UPL at one end of pit. The proposed dump location should be reflected as temporary dumping site as the same may be re-handled for back-filling due to space constrains and advancement of the pit based on exploration output in future. The same should be reflected properly with justification.

24. The powder factor given as 5t/day is less in page-31, this must be checked and corrected and the consumption of explosives reported also need to be checked.

25. Para 2(f), under exploration proposals, as per the field observation, (i) the area need to reassess to understand the presence of ore beneath the sub surface. Therefore, the proposals may be re-drawn. (ii) The possibility of enhancement of life of mines due to proposed additional exploration should also be mentioned. (iii) The mining proposals should be made to complete exploitation of minerals/ore upto UPL at one end of pit. The proposed dump location should be reflected as temporary dumping site as the same may be re-handled for back-filling due to space constrains and advancement of the pit based on exploration output in future. The same should be reflected properly with justification at conceptual period.(iv) The table of existing land-use pattern and end of conceptual period as mentioned at conceptual plate may also be in-corporated in text part.

26. Para 3: The sub-para headings have not been incorporated as per universal format.

27. Para 4(c): Proposed environmental protective measures for temporary dump management such as retaining wall, garland drain, grass and herb type of afforestation etc have not been discussed.

28. Para 5(a): The utilization of part of ore for captive consumption has not been discussed.

29. Para 5(e): Complete utilization of Magnesite ore above the threshold value has not been discussed. Para 6(a): The manual sizing and sorting of ore has not been discussed.

30. Para 7(b): The appointment of full time Mining Engineer and Geologist should be proposed as category-A mine. The mentioning of 'Quarry lease' at chapter PMCP should be replaced as "Mining lease/ mine'.

31. Para 8.2 (i) : The sub-total of land use pattern table at page no-41 is not matching. The same may be checked and corrected.

32. Para 8.3.2: The utilization of top soil if any for afforestation has not been discussed. Para 8.3.3: Tailing dam management is not applicable in this mine.

33. Para 8.3.5: The proposed year-wise summary of construction of retaining wall and garland drain at toe of temp. dump, afforestation at 7.5 m safety zone and dump location etc should be properly reflected. (ii) Proposals of afforestation at active benches are not appropriate at present review of MP.

34. Para 8.6: The F.A. table should be modified as per incorporated table at F.A. plate. Para 8.6, under financial assurance table, in 9th row, 0.57 ha area is marked for effluent treatment, which is not detailed in the text, what effluent treatment is going to be taken is not clear. Besides, 0.060 ha proposed for others, this need to be specified, instead of leaving blank. Below the table, QP's signed without indicating the name qualified persons.

35. Certificate furnished by the QP & the lessee, wherein it is mentioned as applicant, need to be replaced with lessee. The rule quoted for 24A of MCR, 1960; need to be replaced with 17(1) of MCR, 2016. Wherever, recognised person indicated need to be changed as qualified persons.

PART-B

36. Key Plan (Plate No.01A): The proposed water environmental monitoring stations has not properly highlighted. The plan should be as per rule 28(5)(a) of MCDR 1988.

37. Surface Plan (Plate No.03): The GCP's taken boundary pillars as reference points i.e. A & B for all the 3 points is not correct. These GCP's must be away from the ML area at some reasonable distance and connected with the BP's. Hence the points should be changed. The waste dump location depicted at the entrance of the ML area is also not correct. This should be changed to the eastern side, as per the field discussions, along C-D. For waste & also for sorting ore from the ROM.

37. Plate 4:(Geological Plan): (i) The exploration proposals should be modified as per scrutiny comments at para 1(i). (ii) The plan should be prepared as per rule 28(1) (b) of MCDR 1988.

38. Plate 5:(Geological Cross Sections): (i) The exploration proposals should be modified as per scrutiny comments at para 1(i). (ii) 211 category of resources has not been reflected in sections.

39. Year wise Production & Development Plan (2016-17 to 2020-21): Since the mine planned to operate under Category A (Mechanized), the composite plan and sections drawn for five years need to be revised to draw separately for individual years. The proposed developments must be started from the boundary of one end and move towards other end, forming benches 1.5m in soft strata, or 3m in hard strata and width more than the height of the benches. Year-wise production and development plans along with year-wise build-up of temporary dump sections should be enclosed as Category-A mine. The individual year wise plate should be updated as on 31.03.2017, 31.03.2018 and so on up to 31.03.2021.

40. Conceptual plan (Plate No.08): Except the development, there is no change in the dump locations, what is shown in the development plan remains the same. It is expected that the workings at the end of the lease period, the extent of the pit would have moved towards NNE and some extent there is a possibility for back filling in the worked out area, those things should be taken in to preparation of conceptual plan and sections. The conceptual plan/section should be modified as per scrutiny comments at para 2(f).

41. Plate No-10 (Environmental plan): (i) Water monitoring station at water discharge point of ML area should also be proposed. (ii) The plan should be prepared as per rule 28(5) (b) of MCDR 1988.(ii) Plan should be on 1:5000 scale.

42. Reclamation Plan on 1:1000 scale as per Universal Format (showing proposed year-wise afforestation, proposed monitoring station and other protective measures for temp. dump management etc.) has not been enclosed.

43. Plate No-11(Financial Assurance Plan):-- (i) This plan should be renamed as Financial Assurance Plan instead of PMCP as per Universal Format. (ii) Proposed construction of retaining wall, garland drain at toe of temp. dump site have not been reflected.

Annexures:

44. Affidavit from the lessee regarding that no matter is pending against the lease area on the following issues. (1) Issues relating to illegal mining with the State Government. (2) Royalty and Revision matters with the State Government. (3) Safety and Environment issues of General Public Concern. (4) Public Interest Litigation (PIL) and other Court cases etc, has not been enclosed.

45. Feasibility study report :(i) Exploration, Production schedule and mining chapters should be modified as per above relevant Scrutiny comments. (ii) Proposed operation cost should also include royalty (3 % of average sale price on ad valorem basis) and payment to NMET (2 % of Royalty) & DMF (30 % of royalty). Accordingly, economic viability may be made w.r.t. present sale value of ore. (ii) The rule under which document submitted should be checked & corrected at "Conclusion".