SCRUTINY COMMENTS ON REVIEW AND UPDATION OF MINING PLAN OF FEROZABAD LIMESTONE MINES OF M/S GULBARGA CEMENT LIMITED, OVER AN AREA OF 765.22 HA. ML. NO. 2558, IN FEROZABAD, KIRANI AND SOMNATHAHALLI VILLAGES, IN KALABURGI TALUK & DISTRICT, STATE KARNATAKA. FOR THE PERIOD-2017-18 TO 2021-22, NON-FOREST AREA. CATEGORY OF THE MINE IS A(FM-FULLY MECHANIZED). SUBMITTED FOR APPROVAL UNDER RULE 17(1) OF MCR,2016. CAPTIVE MINE.

COVER PAGE

- 1. The category of the mine is given as A (Mechanized), whereas the mine is designed for A (FM-Fully mechanized), if it is so, the same need to be attended in the text and in the plates, wherever applicable.
- 2. The proposed period mentioned as 2017-18 to end of lease period is not correct; it is upto 2021-22 for five financial years period only. Besides, it is required to mention document submitted for approval, under rule 17(1) of MCR, 2016.
- 3. The validity of the ML period is given up to 4.10.2057; this should be indicated specifically as per new MMDR Act, 2015.
- 4. The online registration number is not indicated, except the mine code.
- 5. Annexure-5 is not enclosed in this text.
- 6. Annexure-8, wherein the consent to operate permission is going to end on 31.03.2017, still the mining operations/ production are yet to start. Commencements of plant are also not yet commenced. Renewal of consent to operate need to be obtained.
- 7. In annexure-6, pages 180-181 is missing.
- 8. Annexure-17, RQP certificates needs to be deleted and enclosed with only educational qualification certificate and professional experience certificate need to be enclosed. In the light of the above remarks, the text and the plates need to be attended and modified appropriately by deleting the RQP & the certificates numbers.
- 9. Few photographs showing the waste dumps, top soil stacks, other infrastructure if any and also all the three GCP's points, all the boundary corner pillars may be brought out in the text for reference.
- 10. The consent letter, the undertaking should be given by the lessee and from the applicant, since the ML is already granted and the lease executed. The rule quoted is 17(1) of MCR, 2016, 17(2) needs to be removed. The RQP certificate number given need to be deleted. The recognized person should be replaced with qualified person. In the light of the above remarks, the text and the plates may be attended, whever applicable.

GENERAL

- 11. In preamble, the applicant indicated as Gulbarga Cement limited, is to be replaced with lessee, the annexure-9, referred to copy of the letter with its English translation is not correct, which needs to be checked. Page no.5: The units of extent of the acquired area by Govt. of Karnataka may be given correctly and referring Annexure -10 not showing any relevance with the extent of the area.
- 12. Page no.6 & 7: The referred Annexure numbers may be correctly given as per the enclosures. It has been observed on the ground that no boundary pillars as per the norms have been erected in the mining lease area.

- 13. In general 1(f), the rule 22 of MCR 1960 should be replaced with 15 of MCR 2016. The RQP certificate indicated may be deleted. Further, the contact numbers belongs to QP's must be corrected.
- 14. Para 2(b), total lease area should be retained, deleting applied area.
- 15. Para 3.1, details of approval furnished without giving the five years period of the each document approval.
- 16. Para 3.3, under proposed & achieved information furnished need to be given up to January, 2017. Further, mining operations discontinued for a period more than two years, which attracts violation of section 4 of MMDR Act, results lapse of mining leases. Delay condone relaxation in this regards obtained in this regards should be enclosed.

PART-A

- 17. Para 1 (c): Black cotton soil should not be considered as over burden. It should be stacked separately & preserved.
- 18. Para 1 (e): It may be mentioned clearly that how many boreholes, by whom have been carried out.
- 19. Para1 (i): Last paragraph may be modified as per the latest estimated reserves/resources as on 30.11.2016. Further, in the same para 1(i), under mineral reserve/ resources, table-1.20, wherein the details of category wise, bench wise limestone and subgrade limestone resources & reserves and OB is enclosed in annexure-21, which may be placed in the text part itself, instead of on annexures side. Besides, how the bench wise limestone and sub grade limestone has been calculated, without undertaking actual mining may be explained.
- 20. Para 1(j) :The justification for enhancement of reserves/resources against the estimation of last occasion after carrying out drilling of 19 exploratory core Boreholes and the date of commencement and completion of drilling may be given. The Form-J and Form-K may be enclosed as Annexure and referred in the text.
- 21. Para 1(I), under future exploration programme, exploration programme drawn for the 4th & 5th year, wherein it is referred as scheme of mining, instead of review & up-dation of mining plan.
- 22. Para 2A(a), in pit design parameters, it is proposed for open cast mechanized, whereas in the beginning of the para it is for A(FM-fully mechanized), if it is so, the same should be given everywhere in the text & in the plates, without difference. Para 2(d) to be attended.
- 23. Para 2(b), 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.
- 24. Same para, under blasting norms & parameters, the powder factor, given as 5.35/kg of explosives is very much on lower side in the homogeneous deposits like limestone, even in iron ore, the powder factors were reported more than 7/kg of explosives and in limestone in the Gulbarga districts it is reported to 10 to 11/kg of explosives. Based on the above remarks, the calculation made for explosives consumption need to be checked and reconciled, wherever applicable.
- 25. Para 2€, under 1st year mine development & production plan (2017-18), wherein the as per the production & development plan, the stack yard is placed near to the working pit, which is not appropriate and correct. The stack yard mentioned, must be clearly specified, whether it is for waste, or subgrade or for ore, etc., instead of just giving stack yard. In the light of the above remarks, the other development and production plan and sections should be attended and modified, suitably in the remaining four years.

- 26. Para 2(f), the under bore holes as on date reported in the table without number, reveals, 73 core, 56 DTH & 17CCS and area covered is 558 ha found to be non-realistic, very few holes only could be shown in the field during the site inspections. The lessee representatives/ nor qualified persons who undertaken the drilling were not confident in showing the drilled holes, which is claimed for 412 million tons of reserves/ resources. Therefore, the lessee company need to undertake exploration thoroughly to re-estimate the resources/ reserves in the ML area. The drilled bore holes should be systematically plugged and numbered with latitudes & longitudes for future reference. Form-J & K application must be submitted to this office.
- 27. The reclamation & rehabilitation figures given in the tables-2.14 need to be rechecked and attended after undertaking the exploration in the areas.
- 28. Para 4(b), the area ear marked for waste dumping/ stacking near to the mine pit is not appropriate and correct. This should be shifted much away from the future development areas. There should not be hindrance for the future mining operations. Accordingly the text & the plates needs to be attended, wherever applicable.
- 29. Para 7(b), the employment potential as per rule 42 of MCDR,1988 may also be specified.
- 30. Para 8.1.1, under PMCP, the existing land use pattern given in table-8.1 & the annual returns for the year 2015-16 are found to be different and not correct. Care should be taken to furnish appropriately.
- 31. Para 8.3.1, under mined out land, the information furnished in table 8.20 & in page-120 table, where 88.33 ha has been proposed for reclaimed during the 2017-18 scheme period to end of the lease is not correct. Besides, this is not the scheme period; it is review and up-dation of mining plan.
- 32. The RQP certificate number given by the QP need to be deleted.

PLATES:

- 33. Plate no. 04(b): Geological Plan part-I: Instead of lessee, applicant name is used, need to be changed and also in all the plates. The western side of lease boundary line in the insight key plan is not similar in the shape as shown in the plan. The designation of Shri. Vinod Kumar who prepared the plates may be mentioned in the title box of the plates. The plan should be modified as per rule 28(1)(b) of MCDR,1988.
- 34. The bottom RLs of the drilled boreholes may be given in the Geological sections. The identification for type of boreholes like core, DTH, CCS may be shown in the geological sections. The borehole no.BH-84 is not shown in the section BB'. Another section is to be drawn covering the boreholes BH-87, BH-88, BH-89, PBH-72, PBH73 and PBH-74 between sections AA' and BB'.
- 35. Plate no. 05(a): Geological sections part-I: In section GG', whether the borehole PBH-54 is a proposed borehole or the drilled borehole, it may be given correctly. In the geological sections, all the 19 core boreholes have not been shown in the sections for which drilling has been carried out during 2016. As mentioned in the text, the proposed 80 boreholes have not been shown in the sections.
- 36. In surface plans, the ground control points are to be shown and these plans are to be duly signed by the surveyor. The date of survey is also to be mentioned. The plate need to be prepared as per rule 28(1)(a) of MCDR,1988.
- 37. Geological longitudinal vertical section may be prepared and enclosed.
- 38. Development & Production Plan (Plate No.6a-2017-18): The proposals made in this year may be attended as per the scrutiny remarks furnished in the text. The certificates furnished by the qualified persons should be replaced with QP & not RQP or Key Persons. In the light of the above remarks, all the plates may be attended. The certificate should be given as "The plan & sections are prepared based on the

lease map authenticated by the state Government. The 1^{st} year workings should be brought out as end of 1^{st} year workings as on 31.03.2018, similarly for the remaining years and up to 31.03.2022. The location of the stack yard to be shifted much away from the working pits.

- 39. Conceptual Plan & sections (Plate No. 08): Though the plan and the sections submitted partly back filled and partly water reservoir is found to be incomplete. Whatever the PMCP activities undertaken from the beginning of the mine up to the end of the life of the mine need to be attended, instead of just showing everything as water reservoirs.
- 40. Environment Plan: As per the list of plates, it is indicated as environmental plan, but in the plate enclosed reveals, environment management plan, which need to be corrected and the plate need to be prepared as per rule 28(5)(b) of MCDR,1988.

ANNEXURES:

- 41. Annexure-5 is missing. Page no.165 to 177 and 178 to 181 are also missing. This may be rectified. The page numbers may be given correctly.
- 42. A copy of the latest resolution of Board of directors for nominated owner of the company as per the latest list of Board of directors as on 1.12.2016 may be enclosed. The latest elected nominated owner has to sign the document. The resolution of Board of directors is to be signed by all the directors.
- 43. The section –wise calculation of estimation of Reserves/Resources may be furnished as annexure.
- 44. A copy of Form-J and Form-K may be enclosed.
- 45. Annexure-19: The borehole logging data of 14 core boreholes only has been enclosed .The remaining 5 core boreholes data may also be enclosed.
- 46. A copy of the lease deed for changed extent of the area of 765.22 ha in the name of M/s Gulbarga Cement Limited may be enclosed.
- 47. Annexure-23: The feasibility report may be signed by the qualified persons/ the lessee.
- 48. Chemical analysis reports of Limestone samples from a NABL recognised laboratories may be enclosed.
- 49. A copy of the scale relaxation permission letter from IBM may be enclosed.