

**SCRUNITY COMMENTS ON DRAFT MODIFICATION TO THE APPROVED MINING PLAN OF RAMGAD & SUBBARAYANAHALLI IRON ORE MINE (ML NO. 2679) OF M/S THE SANDUR MANGANESE & IRON ORES LIMITED, OVER AN EXTENT OF 143.33 HA.(AS PER CEC), AND 139.20 HA AS PER ML DEED, IN RAMGAD & SUBBARAYANAHALLI VILLAGES, SANDUR TALUK, BELLARY DISTRICT OF KARNATAKA STATE. THE SCHEME PERIOD IS FROM 2016-17 TO 2017-18, IN FOREST AREA, CATEGORY OF THE MINE IS A (FM- FULLY MECHANISED MINE).**

#### **COVER PAGE**

1. Name of the document may be corrected as 'Modifications to the approved Mining Plan.' In the light of the above remarks, the text and the plates need to be attended, wherever applicable.
2. The online registration number under rule 45 amended needs to be indicated on the cover page.
3. The name of the mine is not indicated, the period of the document is not indicated, for which the period was earlier approved. Whether forest/ non-forest land, if any should be indicated for reference.
4. The status of the lessee should be written as private company.
5. The extent of the ML area is indicated without indicating the extent of the area as per CEC limit and as per ML deed executed.

#### **GENERAL**

1. Para 1.0 (b): Status of the lessee to be corrected as 'Private company'.
2. Para 1.0(d): Mineral which the lessee intends to mine may be corrected as 'Manganese ore', since no iron ore mining proposals has been furnished in the document.

#### **DETAILS OF APPROVED MINING PLAN/ SCHEME OF MINING, IF ANY,**

3. Para 3.1: Copy of the Mining Plan approval letter may be annexed with the document.
4. Para 3.3:
  - a) Table no. 0.1: In actual nos. of drilled boreholes only Diamond & RC drill holes should be furnished, DTH holes are to be mentioned separately. Drilled Diamond & RC borehole identification nos. during 2013-14 to 2015-16 are to be furnished here.
  - b) Table nos. 0.2 & 0.3: Since F.Y 2015-16 is completeD; all actual Production, Development & Reclamation during 2015-16 are to be mentioned in whole form.
5. Para 3.4: Copy of the Violation letters should be enclosed along with compliance letter.
6. Progress of R & R implementation work as on date should be discussed in this chapter.

#### **PART-A**

7. Para 1.0(e): Year of drilling is to be mentioned in tables 1.1. & 1.2. Additional Diamond & RC boreholes drilled from 2013-14 to 2015-16 are to be mentioned in separate tables (in accordance with 'para3.3, table no. 0.1').
8. Para 1.0(j): Since feasibility parameters has been changed in this modified mining plan in view of enhancement of Reserve/ Resources due to additional exploration and change in production location, afresh feasibility report should be prepared and enclosed.
9. Para 1.0(k):
  - a) Page 17: Recovery of ore is considered as 48% by volume, in which 20% saleble ore, having Mn content more than 25 to 45% and mineral reject is 28%, having Mn content 10 to 25%. In view of Threshold Value notification of Mn ore (i.e. 10%Mn), entire 48% ore recovery is required to be considered as UNFC Cat. 111, wherever applicable.

- b) Page 18: Justification of assigning UNFC Cat. 221 is not correct; since on basis of cutoff value (i.e. 25% Mn content), the same can NOT be placed under mineral resources. Necessary corrections may be applied in section-wise reserve calculation & other relevant places of the document.
  - c) Justification for UNFC Cat. 111 should be given in this para.
10. Para 1.0 (l): Resources under G1 & G2 stage of exploration is not tallying with table nos. 1.8A and 1.8B, may be corrected accordingly. For manganese ore, UNFC Cat. 221 should be merged with Cat. 111 as discussed in earlier comments.
  11. In para 2A(a), under mining, it is given, bench height of 7.5m & the width of 7.5m to 10m, which is not appropriate, which should be either 10m or more than 10m should be proposed. In the light of the above remarks, the other paras and the plates may be attended wherever applicable.
  12. In para 2A(b), under insitu tentative excavation, the ROM/ waste ratio indicated incorrectly, which should be given for every one tonne of ore produced in t, what is the quantity of waste developed in t should be indicated, instead of what is given as 16.35 grant total. In the light of the above remarks, the text table related tables if any need to be attended and modified.
  - 13.
  14. Para 5.0 (a): It is to be mentioned in this para that mineral reject of manganese is non-blendable at present market scenario and would be stacked separately for future use. Locations of mineral reject stacking should be duly marked in the Production & Development plans in respective mining blocks.
  15. Para 8.6: It is to be mentioned here clearly whether any unbroken area is involved for proposed mining activities during 2016-17 and 2017-18 in Governor Point and Dabaxikolla blocks OR is there any change in proposed mining area? If so, the Financial Assurance table is required to be duly modified. Copy of Bank Guarantee is not found to be enclosed.

#### **PART-B**

16. Para 9: Sl. nos. are to be mentioned in the consent letters/ undertakings from the applicant.
17. Key Plan (Plate No.SM02): The approach road to the ML area need to be indicated with approximate distance from a known place. Besides, there are seven blocks, with much distance apart, it is required to indicate the distance between the block to block, the distance to be marked.
18. Surface Plan (Plate No.SM06): the ML number is as 2679, but in the index part it is given 2581, it is better to give, both old and the new together, wherever it is indicated, to avoid confusion. In the light of the above remarks, all the plates may be attended appropriately without any confusion.
19. Geological Plan & section: The exploration bore holes drilled of various types in various blocks, must be shown in red color code with standard notations as per MMR, 1961 and differentiated from the numbers.
20. Tentative excavation Plan for the 4<sup>th</sup> year Governors point (Plate no. MP. 54c ): the depiction to show the tentative excavation plan for development and production location shown in the plate is not legible and with clarity, similarly the dumping locations. In the light of the above remarks, the plates for the remaining years may be attended.
21. Conceptual Plan & sections (Plate No. SM11): The conceptual plan & sections were prepared and submitted as conceptual land use plan. The plan submitted is not appropriate, what will be position at the time final closure of the mine, and what are the steps / methods adopted to back fill the worked out area and the waste dumps, that are going to be stabilized as it is or used for

back filling in the other areas may be dealt. How the position of workings and dumps will look like at that time may be dealt.

22. Environment Plan (Plate No.SM10): The plate is submitted for environment plan, but in the plate box-it is indicated as Environment Management Plan. As per the environment plan, the other ML areas of other lessees present within the buffer zone must be brought out in the 500m line for reference.

23. **Para 11, ANNEXURES:** Following items are required to be annexed with the document:

- a) Copy of the mining plan approval letter dated 05.12.2013.
- b) Copy of MCDR, 1988 violation letters during 2013-14 to 2015-16.
- c) A feasibility study report.
- d) Corrected manganese ore reserve (for UNFC Cat. 111) calculation.
- e) Few chemical analysis reports for iron & manganese borehole samples from Neerlabbi, Governor Point and Dabaxikolla blocks.
- f) Copy of latest season environment monitoring report.