SCRUTINY COMMENTS ON DRAFT FINAL MINE CLOSURE PLAN IN RESPECT OF RABDA GRAPHITE MINE (31.76 ha.) IN VILLAGE-RABDA, DISTRICT PALAMAU, STATE JHARKHAND OF SHRI H.K. PODDAR SUBMITTED UNDER RULE-24(1) OF MCDR, 2017.

TEXT:

- (1) In the cover page the lease area mentioned as 35.771 ha may be corrected.
- (2) During the inspection it was observed that most of the boundary pillars were not maintained properly. The boundary pillars of the mining lease area may be maintained properly as per rule and some photographs of the boundary pillars with pillar no. and their co-ordinates may be enclosed.
- (3) Photographs of the existing quarries have been enclosed as annexure-17 but the quarry numbers are not mentioned in the photographs. Some more photographs of the existing quarries with their location co-ordinates with suitable caption below the relevant photographs should be enclosed.
- (4) Page 3: Copy of Notice regarding temporary discontinuance of mining operation, Form D-1 (Annexure 9) and application for surrender of mining lease (Annexure 15) are not legible. Fresh copy of the same may be enclosed.

(5) Location & Approach (Page 4):

- i) The lease area bounded by the co-ordinates given under the item may be checked.
- ii) The co-ordinates of all the boundary pillars as per DGPS survey should be furnished.
- (6) Page 6: Flow sheet of graphite beneficiation plant not enclosed as mentioned in page 6.
- (7)Page 7: Annexure no. of copy of surrender letter to the State Govt. not mentioned.

(8) Statutory Obligations (Page 08):

- i) Under this item it should also be mentioned that the statutory obligations if any imposed by the Central Government, State Government or any other Authority will be complied with.
- ii) The mine was reported production up to 2012-13. The details of violation letter, show-cause notice etc. issued by IBM, Ranchi & their compliance position submitted by the company may be furnished in the following table.

Sl.	Letter reference with type of correspondence	Violation	of	Reply status
no	like Violation letter / Show cause Notice etc.	rule/rules pointed	out	

(9) **Reserve** (Page 10):

i) As per approved scheme of mining mineable reserve under proved category (111) and probable category (122) has been calculated as 1125483 tonnes and 266338 tonnes respectively. In page 11 under the table depletion of reserve, mineable reserve under proved category (111) and probable category (122) as on 31/03/2017 has been calculated as 1121513 tonnes and 266338 tonnes respectively after depletion of reserve. Under the table for Reserve and Resource estimation as on 01/04/2017, Nil mineral reserve shown against Proved (111) and Probable (122) category. The basis of estimation of reserve and the variation of reserve may be explained.

(10) Review of implementation of mining plan / scheme of mining including PMCP:

i) Mine development: The name and dimension of all the existing quarries in the lease area should be furnished under this item.

(11) Mineral beneficiation (Page no. 12):

Under the item it is mentioned as 'Refer para 1.1'. The referred para 1.1 does not contain such information on mineral beneficiation. The mineral beneficiation process practiced in the mine including sorting, sizing & blending etc. should be discussed and may be modified accordingly.

(12) Mined out land (Page no. 16):

i) Present land use pattern as on date may be mentioned. An extent of 2.135 ha has been degraded by quarry but quarry wise land degraded status has not been specified. Quarry wise land degraded status indicating their name and size etc. should be furnished.

(12) Mined out land (Page no. 16):

- i) Present land use pattern as on date may be mentioned. An extent of 2.135 ha has been degraded by quarry but quarry wise land degraded status has not been specified. Quarry wise land degraded status indicating their name and size etc. should be furnished.
- **ii**) The land use pattern on the completion of Final Closure Plan has been furnished as 4.965 ha. An extent of 2.135 ha of quarry area has been proposed to be converted into water reservoir but the name of the quarries & its extent covered under such water reservoir has not been furnished. The name, number and dimensions of quarries proposed to be converted into water reservoir may be furnished.
- iii) Dump (stabilized): An extent of 0.30 ha of waste dump area has been proposed to be stabilized. Number of dumps and dumping area proposed to be stabilized may be furnished.

(13) Water quality management (Page no. 17):

Under the item it is mentioned that the water analysis will be carried out seasonally. Water analysis report from a NABL accredited Laboratory may be enclosed in the document.

(14) Air quality management (Page no. 18):

Under the item it is mentioned that the ambient air quality is not monitored in the mine due to non-operational status of the mine. But ambient air quality reportdated 22/02/2015 carried out by Scientific Research Laboratory enclosed as annexure 12. The para may be revised and the certificate of accreditation of the laboratory carried out ambient air quality may be enclosed in the document.

(15) Financial Assurance (Page no. 26):

- i) Under Item 1, column Head 'Area under mining' should be mentioned instead of 'quarry'as per the format.
- ii) Nothing has been mentioned under item 13, column 'others to specify' and is kept blank in the table indicating break up of areas for calculation of financial assurance. Same may be corrected. The status of old bank guarantee has not been mentioned.
- (16) There are so many typographical errors in the document. Same are to be corrected.

PLATES:

(01) The DGPS surveyed map / report has not been submitted along with the document in compliance to CCOMs circular No.2/2010 and its addendum dated 21/09/2011 and 11/06/2014 regarding georeferenced cadastral map.

(02) Plate No. 3 (Surface Plan):

(i) Surveyor's signature is missing on the surface plan. The plan should be signed by the competent surveyor.

(03) Plate No. 4 & 4A (Geological Plan and sections):

- i) Quarry number, village road, safety barrier etc. have not been mentioned in all the sections.
- ii) Reservoir has not been mentioned along the section F-F'.
- iii) Pond, huts etc. have not been mentioned along the section D-D'.

(04) Plate No. 9 (Financial Assurance Plan):

Nothing has been mentioned under item 13, column 'others to specify' and is kept blank in the table indicating break up of areas for calculation of financial assurance.
