

SCRUNITY COMMENTS ON REVIEW AND UPDATATION OF MINING PLAN IN RESPECT OF DODDABYLADAKERE LIMESTONE MINE (ML NO. 2350) OF M/S RAMCO CEMENTS LIMITED, OVER AN AREA OF 48.56 HA. SITUATED NEAR DODDABYLADAKERE VILLAGE, HOSADURGA TALUK, CHITRADURGA DISTRICT OF KARNATAKA STATE. SUBMITTED FOR APPROVAL UNDER RULE 17(1) OF MCR, 2016. CATEGORY OF THE MINE IS A (MECHANIZED), NON-FOREST.

COVER PAGE

1. Period of the document may be corrected as from 2017-18 to 2021-22.
2. ML period as per the ML Deed and as per the MM (D&R) Amendment Act, 2015 are to be furnished separately.

INTRODUCTION

3. Specific orders/ guidelines or notifications received from the regulatory bodies time to time pertaining to this ML may be discussed in this chapter briefly. Reason for non-working for last 10 years should also be mentioned. The original lease was granted on 23.10.1982 and expired on 23.10.2002. Whether the lease was applied for renewal to the state Govt., may be dealt elaborately.
4. The lease was originally granted to M/s Canara Minerals Pvt. Ltd., and subsequently transferred to M/s Mysore limestone company Pvt., Ltd. Documentary evidence for this transfer is missing.
5. As per Annexure-2, environmental clearance was granted for Iron Ore and limestone whereas the lease is granted for Manganese ore and limestone. This needs clarification.
6. Para 3.6, since there are no modifications, this para needs to be indicated as “not applicable”
7. Annexure 1F is regarding DGMS permission for common working permission of ML 2350 with ML 2367. In the text it needs to be specified about the lease details of ML 2350 and ML 2367. No documentary evidence is furnished for ML 2350 whereas on cover page ML No. 1849/2350 is indicated.
8. Documentary evidence for change of name of company from M/s Madras Cements Ltd., to M/s Ramco Cements Ltd., is not attached. The same should also be referred in the relevant portion in the text. At all places including on cover pages, text, plates etc. The current name in bracket (erstwhile Madras Cement Ltd) may be indicated.

LOCATION AND ACCESSIBILITY

9. Copy of the application given by the lessee to the State Govt. of Karnataka, seeking extension of ML period in accordance with MM (D&R) Amendment Act, 2015 may be enclosed.

PART-A

10. Para 1.0(e): Nos. of boreholes drilled in the ML area so far should be furnished in this para in a tabular format mentioning: type of borehole, Borehole ID, location, Depth and angle. Chemical analysis report of 5 core boreholes from NABAL or similar accredited laboratory are not found to be enclosed which were already drilled during 2013; at least 10% of total samples are required to be analyzed.
11. Para 1.0 (i): Nil exploration proposals is not acceptable, boreholes proposed during F.Y. 2014-15 and in F.Y. 2016-16 were not drilled so far. Therefore, to ascertain the extent and depth of mineralization, entire potential mineralised area should be explored by detailed exploration (G1 stage) in accordance with Rule 12(3) of MCDR, 2017; small limestone bands which are located at south western side of the ML are required to be explored. Accordingly future exploration programme may be re-framed with additional boreholes to ascertain the complete area.

12. Para 1.0 (j): In economic evaluation of feasibility report, proposed amount to be paid against Royalty, District Mineral Foundation (DMF) and National Mineral Exploration Trust (NEMT) are not considered. Tentative cost of production and sale price are not discussed.
13. Para 1.0 (k): In section-wise detailed calculation of reserve and resource, geologically proved blocked ore resource below UPL (UNFC Cat. 211) is not found to be estimated. Similarly, inferred mineral resource (UNFC Cat. 333) is also not found to be estimated. UNFC categories should be demarcated in all sections.
14. Para 1.0(l): Proposed recovery factor, mining loss and change in reserve estimation parameters w.r.t. last approved document (if any) should be mentioned in this para. Resources under G3 level of exploration should be mentioned in Table-10. No discussion is found in this para on quality of mineral reject.
15. Para 2A(a), under mining, Further, to the brief description, the slope of faces, direction of advancement, approach to the faces & specification of roads, etc., to be indicated. Also, the existing dumps spread parameters, height, slope protective works etc., to be indicated in the proposed method of operations. Besides, the bench height & width indicated in the existing and the proposed method differs, which must be reconciled. Also, the year wise/ bench wise, mRL wise, opening reserve, exploitation & the closing balance may be tabulated for the five years. In the light of the above remarks, the text and the plates may be attended, wherever applicable.
16. Para 2 II, under dump re-handling, it is to be specified that there is no waste dump/ old subgrade etc., propose to be re-handled.
17. Para 2(e) & 2(f) need to be attended in line with the remarks given in the para 2A.
18. Para 2(g), under drilling & blasting, it is indicated the mine is going to be operated through fully mechanized method, whereas the proposals drawn for A(mechanized) method. In the light of the above remarks, the text and the plates may be checked and corrected wherever applicable. The powder factor reported is for 3-4t/kg of explosives is found to be low. This needs to be checked and reconciled. Para 3.6 (ii) parts of the reserves is blocked due to common boundary issue needs to be elaborated. Further, why mining was on hold needs to be explained in detail. Table 12, 23,24 & others-co-ordinates should be indicated in standard format.
19. Para 4.0(b): It is given that, the waste dump has been ear marked in the non-mineralized area (i.e south-western side of ore body which is lying outside the ultimate pit limit is not appropriate and correct. It is must to confirm through bore holes for non-mineralized zone. Description of the inactive dump already present in the ML area may be furnished here in a tabular format mentioning location, extent and height.
20. Para 4.0 (c): Year-wise proposed environment protective measures like construction of retention wall, gully plugs and check dams to be undertaken along the toe of the proposed dump may be furnished here in a tabular format. Location of top soil stacking area may be demarcated separately in the Production and Development plan.
21. Para 5.0(a): Chemical composition of mineral reject which are proposed to stack separately may be furnished here.
22. Para 7.0 (b): Employment potential should be proposed in accordance with the provisions of MCDR, 2017.
23. Para 8.1: In page 49, name, distance and population of the villages present in the buffer zone may be furnished in a tabular format.
24. Para 8.3.1, under mined out land, it is proposed to carry out reclamation & rehabilitation at the conceptual stage, but it is not clear, whether the area will be back filled through waste or through some other means may be briefed.

25. Para 8.6: Rule under which Financial Assurance is being submitted may be corrected as 27(1) of MCDR, 2017. Applicable amount of financial assurance for this ML is (2.91 @ Rs. 3 lakh rupees/ Ha. area) rupees 10 lakh, which is minimum for Category 'A' mine. Further, the RQP certificate number indicated at the end of the page below the signature may be deleted.
26. Under part-B, the undertakings must be from the lessee, instead of applicant.
27. The certificate from the QP must be corrected with MCDR,2017, instead of 1988.

PART-B

28. Para 10, Plates:

- a) **Key Plan (Plate 1):** Nearby ML areas are required to be demarcated in this plan. Wind rose diagram may be drawn on this plan.
- b) **Geological Plan (Plate 4):** Areas covered under different stages of exploration are not demarcated. Limestone bands located at south western side of the ML are not found to be covered under the UPL. The drilled bore holes are not indicated with standard notations, which ought to have been in plan and sections.
- c) **Geological Sections (Plate no. 5):** UNFC categories are not found demarcated in the sections, proposed boreholes should be drawn in the sections.
- d) **Production and Development Plan (Plate No.6A-2017-18):** The ultimate pit limit depicted is very small and not systematic planning concerned with future mining operations, though the lease is expected to continue up to 2032. The development and the production proposals should be increased considerably to mine the deposits and to know the lateral and the vertical depth continuity. In the light of the above remarks, the remaining development/ production plates may be attended, including the text part, wherever applicable.
- e) **Conceptual Plan(Plate no.8 & 9):** the conceptual plan and sections needs to be attended, considering the situation and what would be position of workings, dumps, stacks at that time of closure of the mine/ conceptual stage, should be brought out clearly for understanding.
- f) **Financial area assurance plan (Plate no. 10):** Outlines of the proposed mine workings, dumps, stacks, etc. covering all the items under the financial assurance table and at the end of F.Y.2021-22 may be shown in this plate. Local geology may be removed from this plate.
- g) **Environmental Plan (Plate no. 11):** Few surface water monitoring stations may be proposed along the south of the ML where the seasonal nallah is flowing.

29. Para 11, Annexure: Following items are required to be annexed with the document:

- a) Copy of the application given by the lessee to the State Govt. of Karnataka, seeking extension of ML period
- b) Corrected feasibility study report considering DMF and NEMT in economic evaluation.
- c) Copy of complete borehole logs of drilled core boreholes.
- d) Section wise reserve and resources calculation (estimation of UNFC category. 211 and 333).
- e) Copy of the analysis reports of limestone (obtained from core boreholes) from NABL/ similar accredited laboratory.
- f) Copy of chemical analysis reports of mineral reject and waste from NABL/ similar accredited laboratory.
- g) Latest season environment monitoring analysis report.
- h) Copy of valid Bank Guarantee.
- i) Photographs of mine workings, dumps, stacks etc., may be annexed in color photos.
- j) Few photographs of boundary pillars may be enclosed.