

Scrutiny comments in respect of Dharampur Limestone mine, M.L/Sy. No.2/5(P) over an area of 87.33Ha, non-forest, A-category, situated in Dharampur –village, Ranavav-Taluka, Porbandar-Distt. of Gujarat-State for approval of Review of Mining Plan under Rule 17(2) of MCR,2016 for the block period of 2016-17 to 2020-21 & actual period of approval 2017-18 to 2020-21 (expiry of Lease period 31.3.2030 as captive use) of M/s Saurashtra Chemicals, A Div.of Nirma Ltd.

Cover page- The block period of approval should be 2016-17 to 2020-21 & actual period of approval 2017-18 to 2020-21 should be given.

Introduction- Page-3, The status of leases either working & non-working & expiry should be given. Page-4, five year block period & approval period should be corrected.

Location & Accessibility: - Page-10, the name of nominated owner & partners with address & contact details in tabular form should be given. The latest copy of resolution of board of directors/nominated owner should be submitted. (Enclosed copies are dated 14.10.2015/10.6.2013) The type of land & ownership right should be given as per form-I&IV /Govt. revenue records & should be translated & enclosed in further submission.

Review of mining plan/scheme of mining: - It should be justified regarding non-submission of RMP within 180 before expiry of last approved MP/MS with valid reason. The ROM production, Development, exploration, plantation done etc. should be discussed with location, top & bottom RL, area/tonnage & grade etc. It should also be review the financial year 2017-18 till Dec.2017. The mine workings have been done unsystematically & irregular manner. It needs clarification. The mine workings done with in statutory barrier or outside lease area near BP-A&B in southern side of lease area & with in statutory barrier of tar road/temple/power line etc. It needs justification with valid reason. The mining working of chalk near temple side & location of boundary pillar F & their latitude & longitude should be corrected as per state CGM authentication.

Para-3.4- It should also be discussed in brief regarding violation issued & compliances reported along with supporting documents.

The feasibility report should be discussed with latest economic parameters, IRR, viability of project etc. in present poor market condition should be concluded.

Geology:- (a) Page-23, Table-A1.9, 20% reserves deducted as estimation error is incorrect, it needs correction. The reserves estimation in earlier mining plan along with year wise depletion of production till date should also discussed. (b) The reserves & resources should be re-estimated as per MEMC rules 2015, where no extrapolation/influence of extreme borehole is allowed in lateral extension & depth wise, below pit/hole is not allowed in G1/G2. (c) Table-A1.6-The reserves & resources blocked in statutory barrier of 7.5m /power line/national highway/temple/nalla should be given specifically in tabular form. (d) The detail calculation tables of net arrival of reserves & resources as on, average depth of pits, bulk density etc. should be discussed. (e) The part of lease area is still devoid of exploration, therefore sufficient number of exploratory borehole should be proposed in extreme boundary of lease area/existing pit also as per MEMC Rule, 2015, no extrapolation/influence of extreme borehole allowed in lateral/depth wise. (f) The word inferior grade should be replaced as “cement grade”, it needs correction. Upper chemical grade limestone horizon is underlain by marginal grade limestone. Its reserve/resource are to be assessed. Accordingly, exploratory proposal is to be made as per MCDR, 2017.

The copy of borehole logs & chemical analysis report of limestone/intercalated waste/mineral rejects etc. should be submitted from an NABL accredited Laboratory only duly signed by authorized person with date & place.

Mining- (a) The existing pit dimension with number of pits, top & bottom RL & number of benches in limestone should be given in tabular form. (b) Page-27 & 28-The 10% undersized limestone (non-salable presently in captive used) should be given in mineral rejects column & 5% mining losses is not correct & acceptable. It needs correction in respective places. (c) The area has been degraded in past due to unsystematic working. Aesthetic aspects of the area have also been affected adversely. Therefore comprehensive mining proposal from one end of the lease area along with simultaneous restoration is to be proposed. (d) The cut of grade & IBM threshold value should also be discussed. (e) It was observed during inspection that excavation of mine workings done with in 7.5m of statutory barrier or outside the lease area near BP-A&B in southern side of lease & temple side area, tar road barrier, chalk where no proposal was there. (f) The survey of lease area should be corrected & updated. (g) Page-27&28, The year of proposal should be 2017-18(Jan,18 to March,18) to 2018-19

instead of 2020-21, it needs correction. (h) Adequacy of man & machinery, capacity & Optimization /detailed calculation should be discussed. (i) The year wise proposed production & development quantity has not been given pit wise, even more that one different pit are available. (j) The tentative conceptual mining should be modified & discussed in text up to life of mine/lease period. Present mining status reveals unsystematic mining affair. Attempt should be made for systematization of existing workings.

Use of Minerals-Page-37- The mineral rejects generation quantity (undersize10%) should be given in table & physical & chemical specification of end used industry should be discussed in para-5(a).

Page-40, the employment potential as required under MMR, 1961 /MCDR, 2017 should be discussed. The appointment of Part time Mining Engineer & Geologist in A-category mine is not accepted.

PMCP-42-49-The land use details should be mentioned as on 01.4.2017, plan period up to 31.3.2021. The year wise afforestation/plantation as per MOEF&CC, Pollution control, EC guideline should be proposed within 7.5m statutory barrier/non-mineralized zone with suitable protective measures/water arrangement should be proposed. The human settlement of cow farming/temporary labour hutments should be given. The copy of distance of Barda wild life sanctuary etc should be enclosed.

Page-55, The updated organization chart for disaster management plan should be given with name, designation & contact numbers of authorized person, their duties and responsibility.

Page-57, financial assurance: Land use pattern should be mentioned as 01.4.2017 and plan period up to 31.3.2021. Table should be modified for proposed year up to 2020-21 & category should be updated as A-category mechanized mines. The land used details should be corrected by addition of land degraded in chalk area near temple, area considered as fully reclaimed is not declared to IBM, tar road etc. The copy of original valid bank guarantee for extended period for the A-others category mine as per provision of MCDR, 2017 should be submitted to IBM Gandhinagar Regional office. Beak up of entire 87.33 ha. area is to be given in the table showing the calculation of financial assurance.

During the pendency of approval, if there is any change in the name / address / ownership of mining lease, it should be informed promptly. Adequate proposal is to made for fencing the mine pits/lease area and plantation or other mode of restoration over mined out area.

Plan & sections: - The plan & section should be mentioned, modified & updated, plates as per provision of appraisal of mining plan, 2014 & Rule 32 of MCDR, 2017 in further submission.

1. **Key Plan:** Lease area should be bounded by all sides showing latitudes and longitudes of extreme boundary points. Land use status i.e. Govt. land, private land & forest land, wind rose diagram etc must be shown by different colour code.
2. **Surface Plan:** The boundary pillar number with co-ordinates as per lease plan authenticated by state is not shown. The plan should be updated by incorporating prominent surface features, chalk unauthorized pit/submergence water logged area/correct location of BP-F near temple etc. The statutory barrier of 7.5m, electric power line, public road, nallah etc. should be shown & leaving barrier as per provision of MCR, 2017. The surface plan should be signed & certified by mine surveyor/mine manager with date & place.
3. **Surface Geological Plan & sections:** The existing/proposed exploratory core boreholes/trial pits/trenches etc. should be judicially shown. All sections should be modified as above scrutiny & show contact with host rock at bottom or maximum possible mineral thickness based on GSI/DMG data.
4. **Production & Development plan & sections:** The plan & section should be updated & modified year wise for 2017-18 (Jan., 18 to March, 18) & 2020-21 year wise instead of composite plan. (Plate No.5) The year wise proposal should be shown properly with benches, top & bottom RL & area & as per EC condition etc. The protective measures, approach roads to working pits etc. should be proposed & shown properly.
5. **Conceptual Plan:** The pit position of mine at conceptual stage of tentative mining should modified & shown in conceptual plan with showing block period & plan period of mining with levels as given in existing & proposed land used details.

6. **Reclamation Plan-** Garland drain, retaining wall, rain water management and mine water discharge system is not shown in this plan.
7. **Environment Plan:** The plate is not prepared as per rule 28(5)(b) of MCDR 88 to show other details population, village boundary, types of land etc.
8. **Financial Assurance Area Plan-** The Land use pattern should be mentioned as on date and subsequent plan period up to 31.3.2021.

Annexure:

1. All supporting documents in legible form should be given in chronological order. The other annexure/copy in Gujarati should be translated in either English or Hindi should be enclosed.
2. The copy of resolution of board of directors for nominated owner/signing authority should be submitted in further submission.
3. The copy of field photographs of trail pits/borehole logs etc. with sign of geologist should be given in further submission.
4. The few more chemical analysis report of ore/mineral rejects etc. should be submitted from an NABL accredited Laboratory.
5. Field photographs of corner boundary pillars with number, RL, latitude and longitude marked on it etc. should be submitted.
6. All Geological reserves/ Block able reserves calculation & Year-wise production & development calculation tables should be annexed with relevant chapter / text of document.
7. The copy of original valid BG of extended period should be submitted to IBM Gandhinagar in final submission.
8. The further submission of document should be properly binding having sufficient strength and the plates are properly folded so that they can be accessed easily.
