

Scrutiny comments in respect of Adityana Limestone mine, M.L/Sy. No.190/42B over an area of 32.78Ha, non-forest, A-category, situated in Adityana-village, Ranavav-Taluka, Porbandar-Distt. of Gujarat-State for approval of Modification of Mining Plan under Rule 17(3) of MCR,2016 for the period of 2017-18 to 2019-20 (expiry of Lease period 31.3.2020 as non-captive) of Shri Suresh Bhai Hamir Bhai Rathod, legal heir of late sh.Hamir Harji Kutana.

Cover page- The block period of approval should be 2017-18 (Jan.2018 to March, 18) to 2019-20 should be given.

Introduction-

- **Lease area is in the name Shri Hamir Harji Kutana. Mining plan has been submitted in the name of Shri Suresh Bhai(legal heir of the lessee). But no document from State Government in support of transfer of mining lease in favor of so called legal heir has been submitted as per relevant statute.**
- **No document in support of extension of lease has been enclosed.**
- Page-1, The history of mine should be discussed in brief from grant of mining lease & subsequent renewal & approval of MP/MS till date with copy should be enclosed in the form of annexure. The valid reason for modification in review of mining plan should be discussed. The latest mining plan was approved on 02/12/2016 for the period of 10.12.2016 to 2019-20 & existing approved ROM quantity & further modification should be discussed. The copy of distance of nearest wild life sanctuary & EC capacity etc should also be discussed.

Location & Accessibility: - The type of land & ownership right should be given as per form-I&IV /Govt. revenue records & should be translated & enclosed in further submission. The BP coordinates should be authenticated on lease plan by State CGM should be enclosed in further submission.

Review of mining plan/scheme of mining:-

Chapter on review has been prepared in very casual manner. Contradictory & incorrect information have been furnished. Exploration by way of 3 DTH drill hole has been mentioned but nothing has been mentioned about its period as well as out come of the said exploration. Further description about sampling in the subsequent para is also misleading. Similarly mining status is also not clear as review is given only up to the year 2015-16. Status about the the year 2016-17 & 2017-18 are still not clear.

The review chapter should be discussed from proposal & achievement in latest approved mining plan dated 02/12/2016 & deviation should be discussed & justified. 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 done with in 7.5m of statutory barrier or appears outside lease area near BP-D, L, M in western side of lease should be discussed & justified. The mine workings have been done unsystematically & irregular with stacked mineral rejects/sub grade on loading site. The reason for Modification in review of mining plan should be discussed. The production enhancement without true potential area available as per MEMC rule is not acceptable. The mine workings have been done unsystematically & irregular & mineral rejects/sub grade stacked near loading site for sizing & sorting. It should be shown in closing stock in periodically return submitted to CGM/IBM, if any. The kml file & Google image of lease area should be submitted. The instant mining lease is expiring in 2020; therefore progressive closure of mine should also be discussed with future scope of mining.

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) Geological Chapter has been described very casually. Maximum depth of all the mining pits are 5 m. but thickness of limestone is assumed as 10 m. which is not acceptable. Exploration by way of 3 nos of DTH bore hole have been mentioned. But nothing is mentioned about the period of such exploration. Moreover, in absence of statutory notice, relevant record, bore hole logs, sampling details, authenticity of this exploration is doubtful and can not be considered for reserve estimation. Hence reserve is to be assessed only on the basis of exposed thickness of limestone in the pits. (b) The reserves & resources estimated in latest earlier mining plan & depletion of production achieved till date should also be discussed. 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 depth. (c) The reserves & resources blocked in statutory barrier of 7.5m /power line/road/nalla etc. should be given. (d) The detail calculation of reserves & resources as on date, based upon trial pits/existing pits; Avg. bulk density etc. should be discussed. (e) The part of lease area is still devoid of exploration, therefore sufficient number of exploratory core borehole should be proposed in extreme boundary of lease area/existing pit also as per MEMC Rule, 2015. The instant lease is expiring in 2020; therefore, balance reserves available for future should also be discussed. All Geological reserves/ Block able reserves calculation & Year-wise production & development calculation tables should be annexed. (f) Since exploration so mentioned in the mining plan is arbitrary. A comprehensive exploration is to be proposed as per MCDR 2017 for determination of true potentiality of the area.

The copy of borehole logs/trenches & chemical analysis report of limestone/intercalated waste/mineral rejects etc. should be submitted from an NABL accredited Laboratory 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. There are 11 numbers of the pit in the lease area revealing unsystematic mining affairs for years together. Proposed planning should be made aiming systematization of the existing mining pits. **The proposed scale of 351516 cubic meter mining per year can not be accepted.** (b) The year wise proposed production & development quantity has not been given pit wise, even more that one different pit are available. (c) Page-19, The year wise proposed ROM production table should be given in tonnage also. 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 appears outside the lease area near BP-D, L, M in western side of lease where no proposal was there. (f) The survey of lease area should be corrected & updated. (g) Page-19&20, The year of proposal should be 2017-18(Jan, 18 to March, 18) to 2019-20 (h) It was observed during inspection that few boundary pillars were not available as per statutes in field; therefore copy of boundary pillars as per statutes & Google image of kml file of lease area should also be enclosed. The statutory barrier of road/nalla/surface structure/powerline/wild life sanctuary etc. should be discussed & shown on respective plan & section. (j) It was observed & discussed that entire ROM is utilizing by proper sizing & sorting etc, therefore mineral rejects generation should not be proposed. (k) The tentative conceptual mining should be modified & discussed up to 2020 with simultaneous proposal of progressive closure of mine up to 2020. (l) Lease area is in closed vicinity of agriculture land & human habitation hence any type of drilling & blasting operation are not accepted for this mine. Mining should be proposed without use of explosives.

Page-33, 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-34-41- The progressive mine closure plan has been prepared in careless manner. The land use details should be mentioned as on 01.1.2018 or till date, plan period up to 31.3.2020. The year wise afforestation/plantation as per IBM/MOEF&CC, guideline should be proposed within 7.5m statutory barrier/non-mineralized zone with suitable protective measures/water arrangement should be proposed. The copy of distance of nearest wild life sanctuary etc should be discussed & enclosed. Environment impact assessment & EMP should be discussed properly.

Monitoring schedule of all environmental components should be given with respect to permissible limits & actual parameter in tabular form. Location of different monitoring stations as per IBM/MOEF guidelines and frequency of monitoring may be discussed in text in tabular form. **The progressive mine closure proposal given under item 8.3 are inadequate. There should be comprehensive restoration/rehabilitation plan for entire mined out area to be executed in letter & spirit before 2020.**

Page-41, The updated organization chart for disaster management plan should be given with name, designation & contact numbers of authorized person, their duties and responsibility.

Page-42, financial assurance: Land use pattern should be mentioned as 01.4.2017 and plan period up to 31.3.2020. The land used details should be updated/corrected by addition of land degraded in mineral storage/stacking & sizing & sorting/road/hutments etc. The land used details in earlier approved mining plan dated 02/12/2016 & same in draft document of MMP. Reconcile & furnished the corrected land used details. financial chapter 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.

During the pendency of approval, if there is any change in the name / address / ownership of mining lease, it should be informed promptly.

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.

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. It should be as per MCDR 2017

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/mineral stacks/hutments/, 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.

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.

Production & Development plan & sections: The plan & section should be updated & modified year wise for 2017-18 (Jan., 18 to March, 18) & 2019-20. The year wise proposal should be shown properly with benches, top & bottom RL & area etc. The protective measures, approach roads to working pits etc. should be proposed & shown properly.

Conceptual Plan: The pit position of mine at conceptual stage of tentative mining should modified up to 2020 & shown in conceptual plan with showing block period & plan period of mining with levels as given in existing & proposed land used details.

Reclamation Plan- Garland drain, retaining wall, rain water management and mine water discharge system is not shown in this plan.

Environment Plan: The plate is not prepared as per rule of MCDR 2017 to show other details population, village boundary, types of land etc. The plan submitted with the document does not full fill the requirement of MCDR 2017

Financial Assurance Area Plan- The Land use pattern should be mentioned as on date

and subsequent plan period up to 31.3.2020.

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 lease deed, approval letter/violation letter/ authenticated lease plan with coordinates etc should be enclosed.
3. The copy of field photographs of present workings/trail pits/borehole logs etc. with sign of geologist should be given in further submission.
4. The copy of permanent/correspondence address & identity of lessee should be enclosed in further submission.
5. The few more chemical analysis report of ore/mineral rejects etc. should be submitted from an NABL accredited Laboratory.
6. The copy of MoEF notification dated 28/4/2017 regarding ESZ of working with in 1km from barda wildlife sanctuary should be enclosed.
7. Field photographs of corner boundary pillars with number, RL, latitude and longitude marked on it etc. should be submitted.
8. The copy of original valid BG of extended period should be submitted to IBM Gandhinagar in final submission.
9. Quarterly monitoring report on air, water & noise is not enclosed as per category of the mine for last 2-3 quarters duly signed with date & place.
10. 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.
