

Scrutiny comments in respect of Ranavav Limestone mine, M.L/Sy.No.78/5P over an area of 12.14Ha, non-forest, A-category, situated in Ranavav-village & 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 2015-16 to 2019-20 & actual period of approval 2017-18 to 2019-20, expiry of Lease period as per MMDR amend act 2015 is 10.2.2025 of Shri Udaisingh M Jethwa.

The draft document should be prepared as per appraisal of mining plan 2014 format & guidelines.

Introduction- The date of first grant of lease & subsequent renewals etc till date should be given. The date of first grant is 10.2.1975. It needs correction. The rules should be corrected as 17(2) of MCR, 2016, it needs correction. The approval of mining plan & subsequent submission of scheme of mining, approval/not approval should be discussed in chronological order till date with annexure. It should also be discussed about inspection by State Govt & Rajkom/Statement dated 17/11/2017 as submitted to IBM. Other details/copy of State Govt of nearest distance of lease boundary from reserves forest, water resources department, TOR etc. should be discussed & enclosed. There are several public complaints about this mine in past. A separate para in the introductory chapter is to be added specifically addressing the issues raised in such complaints along with mitigating measures.

Annexure-6A & 7A are only receipt not Form-J & form-D, it needs correction. Other irrelevant text at page-2 should be deleted.

Location & Accessibility:-Page-3, permanent & postal address of lessee should be discussed. Page-6, the nearest correct distance of barda wildlife sanctuary & Maliyadhar reserve forest should be given & enclosed copy by CGM/MoEF. Page-7, The latitude & longitude of BP-8 should be corrected as per lease plan. The relevant information should also be discussed.

Review of mining plan/scheme of mining:-Page-8, The approval of MP & subsequent scheme of mining etc should be discussed. The proposed & achieved production & development location, top & bottom RL, area/tonnage & grade etc & deviation should be discussed & justified in remarks column instead of shown in proposed column. It should be reviewed about 2015-16, 2016-17, and 2017-18 till date.

Para-3.4 & 3.5- It should be discussed in brief regarding violation, Show-cause, court case etc & compliances reported along with supporting documents. The last SOM was not approved due to time barred should be discussed. It needs correction at Page-12.

The feasibility report should be suitably linked to the reserves estimated with latest economic parameters and it should be discussed regarding viability of project with conclusion.

Geology:- (a) The reserves & resources estimated in last approved scheme of mining & depletion of production should be discussed & given in tabular form. (b) The reserves & resources should be re-estimated as per MEMC rules 2015 based upon available logs. (no extrapolation/influence of extreme borehole is allowed in lateral extension & depth wise, below pit/hole in G1/G2.) (c) The reserves & resources blocked in statutory barrier of power line/State highway/nallah should be given in tabular form. (d) The exploratory borehole/pit should be proposed & shown in extreme lease boundary/corner up to depth of mineralization as per MEMC Rules 2015.(f) The copy of existing trench/borehole logs, should be submitted.

Mining-Year 2017-18 is already on the verge of end. Hence proposed scale of production can not be achieved in 2 month. Either proposal is to be given for proportionate production for the remaining part of the year i.e. February & March 2018 or it should be before remaining part of the implementation period.

Mining Page-23, (a) It was observed during day of inspection that mining operations were not carried out on inspection day. (b) The survey of lease area was not updated in plan & section till date, therefore present land used details should be checked & modified with incorporating new office, correct location of nallah as per lease plan, power line etc. (c) The existing pit dimension with number of pits, top & bottom RL & number of benches in limestone should be given in tabular form. (d) The production & development proposal should be given financial year wise instead of I, II, III, IV&V yr. It needs correction. (f)In light of public complaints & existence of cultivated field in the surroundings, mode of excavation should be of non- explosive and non detonating in nature. It means, drilling & blasting should be replaced with Rock breaker & loader/dozer/excavator. (g) The mine design parameter should be discussed with all precautionary measures. (h) Proposed scale of production of 1.17 Lakh tone/Annum is not acceptable without ascertaining the true potential of area. It needs

correction & reduce as per earlier target. (i) Page-25, production tables should be modified as per appraisal of mining plan 2014. It needs correction. (j) Adequacy/calculation of man & machinery, capacity & optimization should be discussed. (k) It is not clarified whether mining machinery /manpower own purchased / hired/contract etc. (l) The land use pattern should be mentioned as on 01.4.2017 and subsequent plan period up to 2019-20 and conceptual/lease period by considering five year block period. (m) Document should be modified as per manual of appraisal of mining plan 2014. (n) It was discussed during inspection that installation proposal for crusher in lease area, same should be discussed with location & capacity, safety boundary etc.

PMCP-Page-44, (a) existing land use pattern should be as on date & further plan period up to 31.3.2020 in tabular form. (b) The baseline information should be given in text. (c) The year wise afforestation/plantation should be proposed along seasonal nallah & within 7.5m statutory barrier in south side with suitable protective measures/water arrangement. (d) Page-46, nearest distance of barda sanctuary & reserves forest from lease should be corrected.(e) The monitoring schedule of environmental parameters, location & frequency of monitoring should be discussed as per guideline. (f) It should be proposed for construction of suitable dimension of the embankment/ parapet walls/ fencing along to seasonal nala etc.

Page-57, financial assurance-The details of land use pattern should be mentioned as on date and subsequent plan period up to 31.3.2020. The copy of original valid bank guarantee for extended period of five years for the A-others category mine as per provision of MCDR, 2017 should be submitted to IBM Gandhinagar Regional office. (Minimum 10Lakh) Page-59, certificate should be corrected & modified as mod. in MP.

Plan & sections: - The plan & section should be modified & updated based upon above scrutiny. The soft copy of kml file & Google image of lease area as per boundary coordinates in lease plan should be submitted. Irrelevant copy should be removed.

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:** It was observed during inspection that, survey of mine area is not updated on plan & section & not matching in field. The boundary pillars were not placed & erected as per location/statutes. The contour should be corrected (BP-2) with surrounding level of area. The boundary pillar numbers with latitude, longitude as per state CGM, mineral stacks/mineral rejects etc. should be shown. The electric power line (between BP 10&11), public road, human settlement in encroachment lease area, seasonal nallah etc. should be shown correctly & leaving barrier as per provision of MCR, 1960. The surface plan should be modified & signed & certified by mine surveyor with date & place.
3. **Surface Geological Plan & sections:** The existing/proposed exploratory core boreholes, mine pits with G1, G2, G3 level of exploration should be correctly shown. All sections should show contact with host rock at bottom or maximum possible mineral thickness based on GSI/DMG data.
4. **Production & Development plan& sections:** (i) The plan & section should be updated & modified financial year wise instead of I, II, III, IV etc. (ii) The year wise proposal should be shown in G1/G2 area as per MEMC Rules with benches, top & bottom RL & area etc. (iii) The statutory barrier of national highway, power lines, reserves forest & other protective measures, should be shown properly. The conceptual plan should be updated & showing five year block up to life of mine.
5. **Conceptual Plan:** The pit position of mine at conceptual stage of tentative mining should be water reservoir since no waste generation.
6. **Reclamation Plan-**Existing & proposed afforestation along seasonal nalla, 7.5 statutory barrier is not shown properly in plan. Garland drain, rain water management & 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& features in 60m & 500 area etc.

8. **Financial Assurance Area Plan-** The details of land use pattern should be mentioned as on date and subsequent plan period up to 31.3.2020 in tabular form.

Annexure:

1. All supporting documents in legible form, from first grant of lease to till date, Mining plan & subsequent scheme of mining approval should be given in chronological order. The other annexure/copy in Gujarati should be translated in either English or Hindi should be enclosed.
2. A letter from state CGM, Gujarat for extended period of lease as per MMDR act 2015 & complaint compliances Rajkom report should be enclosed in further submission.
3. The copy of permanent & correspondence address of lessee should be enclosed in further submission.
4. Field photographs corner boundary pillars with number, RL, latitude and longitude, plantation done near nala/new office should be submitted.
5. All Geological reserves/ Blockable reserves calculation & Year-wise production & development calculation tables should be annexed with relevant chapter / text of document.
6. The copy of borehole log & few more sample analysis should be submitted.
7. The copy of original valid BG of extended period should be submitted to IBM Gandhinagar.
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.