

Scrutiny comments in respect of Gurgadh Limestone mine, M.L./SyNo.-404P over an area of 24.1813Ha, non-forest, A-others category, situated in Gurgadh-village, Kalyanpur-Taluka,& Devbhumi Dwarka-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 2018-19 to 2020-21 (Lease period expired on 10.3.2046 of M/s Gokaldas Jamnadas.

Cover page- The block period of approval 2016-17 to 2020-21 & actual period of approval 2018-19 to 2020-21 should be given. The expiry of lease period should be given as per MMDR amendment Act 2015 (10.3.2046).

Introduction- Page-1, The brief history of mine should be discussed from first grant of mining lease, approval of MP/SOM/Modification/lapsing period etc. (ii) The copy of Environment Clearance /Consent to Air & Water etc. should be discussed & submitted in the form of annexure. The valid reason for non-operational of lease till date must be discussed & supporting documents should be annexed. It was observed during inspection that no BP of lease area was available in field. (ii) The old mine workings have been done with small shallow pits within 7.5m of statutory barrier of lease should also be discussed as reported & justified with supporting documents. The valid reason for non-operational, distance from CRZ/ESZ of barda wild life sanctuary should also be discussed & supporting documents should be annexed.

General-Page-3, Page-3, The lessee is partnership firm, therefore latest copy of resolution of board of directors for nominated owner/authorised signatory should be enclosed.

Location & Accessibility:- Page-2,(i) expiry of lease period i.e.10/3/2046 as per MMDR amendment Act, 2015 should be given. (ii) The email id, fax & contact number of lessee should be given. (iii) The ownership details of lease area based on Govt. revenue record should be given in tabular form.

Details of approved mining plan/scheme of mining-(1) The review chapter should also be discussed about year wise production, OB/Development, exploration, plantation done etc. with location, top & bottom RL, area/tonnage & grade etc. (2) It should be discussed & justified the review chapter in past production achieved, as per existing pit area. (3) The existing exploratory trial pits, location & depth have not been given. (4) ROM production quantity should be discussed as per IBM monthly & annual returns submitted to this office.

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 conclusion.

Geology-(a) The reserves & resources estimated in earlier approved mining plan & depletion of production achieved, if any 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 depth. The depth wise extension assumed for reserves/resources estimation is not correct. Any exposed thickness of limestone is to be considered for reserve estimation. The lease area is confirming of three detached blocks, hence reserves/resources estimation should be made on block wise basis only on exposed thickness of limestone in respective block. (c) The reserves & resources blocked in statutory barrier of 7.5m /power line/road/nalla etc. should also be given in tabular form. (d) The detail calculation of reserves & resources 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 up to depth of limestone as per MEMC Rule, 2015. The trail pits/trenches of shallow depth are not acceptable. (Page-11) All Geological reserves/ Block able reserves calculation & Year-wise production & development calculation tables should be annexed. The cut-off grade & threshold value of limestone mineral should be discussed as per IBM circular 2009. The above threshold & below cut-off grade should be consider as mineral rejects. 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:-Page-16, The existing pit dimension should be discussed with depth of pits, top & bottom RL, number of benches etc. The year wise proposal should be modified/corrected from 2018-19 to 2020-21. It needs correction. It was observe during inspection that survey of lease area/ latitude & longitude of BP were not matching with plan & section. Reconcile with lease plan & corrected & furnished. The production & development tables should be given in tonnes also. All Geological reserves/ Block able reserves calculation & Year-wise production & development calculation tables should be modified/corrected as per MEMC Rule 2015. The correct existing pit dimension along with no of benches, top & bottom RL etc., in tabular form should be given as on 01.4.2018. The year wise proposed production & development quantity has not been given in tonnes also. The above threshold value & below cut-off grade should be given as mineral rejects. Why mining operation should be suspended/prosecuted for workings without mining plan in past. It needs justification.

Page-21, The adequacy of man & machinery, calculation & their capacity should be discussed & justified. It should be clarified whether HEMM proposed/used is own/hired/contract etc. with supporting documents.

Page-22, The mining proposal in present plan period & conceptual period, life of mine etc is discussed properly. The land used details should be discussed as on 01.4.2018 & plan period up to 31.3.2021 & lease period/conceptual period.

Page-26,27 The quantity of mineral rejects generation as per buyers specification(+50%Cao) of -50% to +34% should be discussed & given. The above threshold value & below cut off grade/Sale grade of ROM should be shown in mineral rejects column.

Page-29, The organization chart of manpower employment as per MMR1961 & MCDR,2017 should be given. Page-29,30 PMCP: - Land use pattern should be mentioned as on date or 01.4.2018 and plan period up to 31.3.2021 and lease period. The existing as well as proposed environmental protective measures should also be given in tabular form with supporting latest analysis results.

Page-40, financial assurance: Land use pattern should be mentioned as on 01.4.2017 and plan period up to 31.3.2021. The copy of original valid bank guarantee of extended period for the A-category mine should be submitted in further submission in the form of Annexure (Min-10Lakh). All plan and section, text & tables should be modified based on above scrutiny.

During the pendency of approval, if there is any change in the name / address / ownership of mining lease, it should be informed promptly. All plan and section, text & tables should be modified based on above scrutiny.

All plan and section, text & tables should be modified based on above scrutiny & deficiencies should be rectified.

Plan & sections:

1. **Lease Plan:** It should be translated in English & coordinates of boundary pillar with numbers, latitude; longitude duly authenticated by CGM should be enclosed.
2. **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.
3. **Surface Plan:** The boundary pillar numbers with latitude, longitude as per state CGM, seasonal water course as observed during inspection, road, true contouring of area, old working pits etc. should be shown properly. The statutory barrier of 7.5m, nalla, ESZ etc. should be shown & leaving barrier as per provision of MCR, 2016. The surface plan should be signed & certified by mine surveyor/mine manager with date & place.
4. **Surface Geological Plan & sections:** The existing trenches & proposed exploratory core boreholes should be judicially shown. All sections should show contact with host rock at bottom or maximum possible mineral thickness based on GSI/DMG data. The surface feature falling in between two adjoining block has not been shown. The geological sections are imaginary & continuity of limestone mineralization is shown without any exposure.

5. **Production & Development plan& sections:** The survey of area & plan & section should be updated & modified year wise instead of composite plan. 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. The year wise proposal should be modified pit wise in G1&G2 level of exploration as per MEMC Rule,2015 only.
6. **Conceptual Plan:** The pit position of mine at conceptual stage of tentative mining should be shown in conceptual plan with showing plan & block period of mining with levels as given in existing & proposed land used details.
7. **Reclamation Plan-**Existing & proposed afforestation is not shown properly in plan. Garland drain, retaining wall, rain water management and mine water discharge system is not shown in this plan.
8. **Environment Plan:** The plate is not prepared as per provision of MCDR 2017 to show other details population, village boundary, types of land& features in 60m & 500 area etc.
9. **Financial Assurance Area Plan-**The break-up of mine land area in plan should be given in table & text. Land use pattern should be mentioned as on 01.4.2018 and subsequent plan period up to 31.3.2021.

Annexure:

1. All supporting documents of latest copy of lease grant, mining plan & state DMG letter for deemed extension of mining lease as per MMDR Act,2015, coordinates of lease boundary pillars duly authenticated by CGM, State Govt should be submitted in further submission. The other annexure/copy in Gujarati should be translated in either English or Hindi should be enclosed.
2. The copy of field photographs of trail pits/borehole logs etc. with with sign of geologist should be given in further submission.
3. The latest chemical analysis report of ore/mineral rejects etc. should be submitted from an NABL accredited Laboratory.
4. Field photographs of present mine workings, corner boundary pillars with number, RL, latitude and longitude marked on it etc. should be submitted.
5. Latest quarterly monitoring report on air, water & noise should be enclosed as per category of the mine for last 2-3 quarters.
6. The copy of original valid BG of extended period should be submitted in the form of annexure.
7. The copy of resolution of board of directors & nominated owner/signing authority should be submitted in further submission.
