

**Report cum scrutiny comments on examination of Review of Mining plan with Progressive mine closure plan of Jasadhar mine of Sh. Dana Bhai Meraman Bhai Barad over an area of 1.3172 hect. (Survey no. 52/2A) situated in villages Jasadhar, Taluka Talala, District Gir Somnath submitted under Rule 17(2) of MCR, 2016 and 23 of MCDR, 2017.**

**General**

1. The Cover Page do not have standard format. IBM registration, Mine code and owner email address are not furnished. Category of mine is not correct.
2. Certificate/Undertakings from Owner & Qualified person are not as per guide line. It should be corrected & updated.
3. The lease plan showing area and all the pillar coordinates duly authenticated by state Govt. should be enclosed.
4. Copy Environmental Clearance obtained from MOEF should be enclosed. Adequate water harvesting measures should be proposed towards protection of environment.
5. Further consent to operate mine obtained from State Pollution control Board should be enclosed.
6. It appears that mining operation are discontinued since the execution of mining lease. Hence it is case of lapse of mining lease under 20 of Mineral (OAHCE) Concession rules 2016. Letter from state Government is required in respect of revival of mining lease.

**Chapter: Introduction:**

7. Introduction is not written as per guide line. The date of first grant of lease & subsequent renewals etc. till date should be given. The approval of mining plan & subsequent submission of scheme of mining, approval/not approval should be discussed in chronological order till date with annexure.

**Chapter no.2- General**

8. IBM registration no is not furnished & similarly email address of owner is not correct.

**Chapter no.2- Location and Accessibility**

9. Date of lease grant order is not correct.
10. KML file is not enclosed.
11. Compliance of CCOM circular 2/2010 with regard to Geo-referenced mining lease map has not been done.
12. Boundary pillar should be erected and the photographs of pillar erected with coordinates should be enclosed.

**Chapter no. 3-Details of approved mining plan/scheme of mining**

13. This chapter is not written as per guide lines.
14. Information regarding mine not working is not supporting by document. Reason of not working is not given.
15. Information regarding violation point out & their Compliance position are not furnished. Mines previously suspended on dt. 12.01.2012. But no information is given about it at para no. 3.5. No information given about revoke of mine.

**Part-A**

**Chapter no. 1.0 Geology & Exploration**

16. This chapter is not prepared as per guide lines.
17. On inspection of mine RL of pit is not correct in text. Succession of local geology is not furnished. Pit no. is not marked in plan.
18. Mining lease was not operative since grant of lease. It is not understood how exploration work was carried out without information to the statutory authorities.

- Such exploration work cannot be accepted. Exploratory cores are required to be preserved.
19. Drilled Bore hole data are not correct. No information given to IBM about commencement of bore holes drilling. Drilled Diameter given for bore hole is not correct. Log register, Sampling & analysis report is not enclosed. No information given to IBM about commencement of bore holes drilling.
  20. Analysis report of Limestone is not furnished. It should not more than six month old & be supported by the certificate NABL (National Accreditation Board of laboratories) laboratory. Analyzed Sample location of limestone is not marked in any plan. Analysis of Bulk density is not enclosed.
  21. In future exploration location of proposed bore hole are not marked in plan. Grid coordinates/lines is not furnished.
  22. Mineral reserve is not correct & not done by MEMC Rules 2015.
  23. Mineral reserve is to be re-estimate on the basis of Mineral (Evidence of mineral content) Rules 2015. Accordingly only exposed thickness of mineral shall be considered in whole reserve/ reserve estimation. Lateral extension for G1 & G2 is to be taken not more than 50% of the grid spacing of the probe point. So as per rule reserve re-assessed on the basis of section wise. No extrapolation/influence of extreme borehole is allowed in lateral extension & depth wise, below pit/hole in G1/G2.) The reserves & resources blocked in statutory barrier of power line/State highway/nallah should be given in tabular form. The exploratory borehole/pit should be proposed & shown in extreme lease boundary/corner up to depth of mineralization as per MEMC Rules 2015. The copy of existing trench/borehole logs, should be submitted. Since DTH exploratory bore hole are not accepted. Hence entire reserve is to be revised on the basis of exposed thickness of limestone.

### **Chapter no. 2-Mining**

24. This chapter is written very carelessly & not as per guide lines.
25. Proposal in this chapter should be modified after correction of Geology chapter accordingly.
26. Contrary statement given about total mined out area. As in chapter no.3: Details of approved mining plan/scheme of mining written that no mining production done in last fourteen years. But in mining chapter 0.3977 hect. area mined out. This area is not shown in any plan. What is correct? Justified it.
27. Contrary mining proposal (Volume) given at page no. 25. In one table Volume for Ist year (2018-19) excavation is 23389.6 cubic meter but on the same page below table is 21296 cubic meter. Check & update for all the year proposal. Contrary information given about proposed pit numbers. Year wise proposed mining area taken are not shown by Grid lines for plan. Such a high scale of excavation cannot be accepted in a small area of 1.9 ha with limited thickness of limestone.
28. About manual mining nothing is to be discussed. Manual mining proposed is not acceptable. As limestone hard & compact. How to extract the Limestone manually? How much labourer work daily. Give justification. It should be semi-mechanized. Give proposal of semi mechanized mining. Proposed scale of mining operation are not accepted. Entire proposal is to be revised on the basis of exposed thickness of limestone.
29. Para no. (f): Conceptual mining: Vital detail pertaining to life of the mine (5 year block wise), ultimate pit size and post mining scenario and reclamation- rehabilitation aspect have not been discussed properly.

#### **Chapter no. 4 Stacking of Mineral Reject**

30. Proposal of Storage of soil & mineral reject should be made accordingly changes in mining chapter. Many dump/mineral stack are not marked in plan.
31. But nothing to be discussed where to dump/ store Mineral stack. What is the dimension and grade of it? Location of stacked to be given in text also.

#### **Chapter no. 7.0-Other**

32. Rule for employment of mining Engineer & Geologist under MCDR rule 2017 is not correct.

#### **Chapter no.8-PMC**

33. The proposal in this chapter should be changed as per Geology & mining chapter accordingly.
34. Para no. 8.2: Air /Noise/ water pollution report are not discussed & references of monitoring report of air, noise & water pollution report is not furnished.
35. No proposal is given for rehabilitation of worked out benches, water management, plantation, fencing etc. Safety, security, disaster management plan is also incorrect. In any emergency in the mine no responsible person address is not furnished.
36. In para no.8.3.1: Given pit detail is not matching with mining chapter.
37. In para no.8.3.5: Year wise proposal given for rehabilitation by making water reservoir is not marked in plan.
38. In PMCP, para no. 8.6-Information given in table is not correct & needed to be checked & updated.
39. The Financial assurance co-terminus with review of mining plan period in favour of Regional Controller of Mines, IBM, Gandhinagar.

#### **Plates**

40. **Location plan** is not prepared.
41. **Key Plan** is not submitted with all the information/ prominent feature as required under rule 32(5) (a) of MCDR 2017 because some of important aspects are not incorporated like existing tree density, Wind direction, Village population, land status, topo sheet no, various monitoring stations have not been marked, etc.
42. **Surface Plan:** Surface plan is not submitted with all the information/prominent surface features as required under Rule 32(1) (a) of MCDR, 2017. Pillars & their co-ordinates are not marked. Other permanent features like contour line, temple, buildings, hutments, etc. exist in the ML area may also be marked.
43. **Surface Geological Plan:** is not submitted as per the relevant details as required under rule 32(1) (b) of MCDR 2017 because depth persistence & horizontal for different category of reserves not marked, strike & dip of the formation not shown, lithological contacts not marked distinctly, other adjoining ML area marked on sections. UNFC code in Geological sections is not marked. It should be updated as geological reserve changed. Geological section are imaginary as exploration done is not accepted. All the sections are to be redrawn based on exposed thickness of the limestone.
44. **Year wise Plan:** Plan is not prepared as per guide line. Five year planning with grid lines is not shown. Ultimate pit limit not marked, proposed protective works have not been marked correctly.
45. **Year wise Section:** Five year development section are not prepared as per guide lines. UNFC code is not given.
46. **Environment Plan:** The plan has not been prepared incorporating all details as per rule 32(5)(b) of MCDR'2017 because land use pattern within 60m & 500m not marked precisely, monitoring stations of Air, Water & noise quality Survey not marked, position(s) of the adjacent leases are not shown on the Environment Management Plan. Land use, contour value 60m beyond the proposed ML area has

not been prepared and all the surface features including human settlement may also be shown.

47. **Reclamation plan:** Para 8.3: the details of progressive mine closure plan is not depicted distinctly on plan. The year wise completion status of proposed protective works should be incorporated in this plate. Sections have given which are required for this plan.
48. **Conceptual Plan:** Five year block wise mine planning till the life of mine is not made. Pit configuration at the ultimate stage not marked, benching pattern not indicated in section, ultimate depth of working not marked, approach to faces at conceptual stage not marked.
49. **Financial Area Assurance Plan:** Area marked under FA table must should be matched with the broken up areas as marked on plan. FA table is not available at FMCP plan for ready reference.
50. Feasibility report should be modified as per above relevant scrutiny points.
51. Numbering of annexure & plate is not in chronological order in text & index. Many annexures are not clear & nor readable.
52. Many annexures are in Gujarati. So these annexures should be submitted in English version also.
53. Some of the mine photo such as pillar, working and old pit etc. should be enclosed.
54. There are certain omissions, deficiencies in the text and plates. Some of them are marked in the text & plates. QPs should ensure thorough editing before preparing the final copies.

Place: Gandhinagar

Date: 02.02.2018

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