

Scrutiny comments in respect of Ratadia Nagrecha Bauxite Mine, area-204.07Ha, M.L/Sy.No.133,262 & 305P non-forest, A- category, situated in Ratadia & Nagrecha –villages, Mandvi-Taluka, Kuchh-Distt. Of Gujarat-State for approval of Review of Mining Plan under Rule 17(2) of MCR, 2016 for the approval period of 2018-19 to 2021-22. (Expiry of lease-18.1.2027)

01. Location & Accessibility: -(a) The expiry of lease period should be corrected as 18.1.2027 MMDR Amendment Act, 2015 instead of 31.3.2020. (b) The ownership right should be given as per form-I&IV/Govt. revenue records & should be translated & enclosed in further submission.

02. Review of mining plan: -(a) The five year period of approval of RMP from 2008-09 should also be discussed or lapse of period, if any may be justified. (b) The last Scheme of Mining was approved on 15.2.2013 for the period of 2013-14 to 2016-17 (18.1.2017) but during 2017-18 33077T of ROM production achieved without approved RMP. It needs clarification. (C) The 70000T OB/Waste & dump production shown in annual return 2016-17, whereas stripping ratio NIL shown in review chapter & dump recovery shown in return which is not possible in waste dump.(d) It was observed during inspection that irrespective of ROM Stacks, (<10MM) of sub grade/mineral rejects stacked with in lease area but same has been given in dump column in monthly return which is incorrect. It needs correction. The review chapter has been discussed up to Jan., 17 only; it should be discussed & updated up to 2017-18 & deviation should be justified.

03. Geology:- (a) The copy of few more chemical analysis report of bauxite/intercalated waste/mineral rejects etc. should be submitted. (b) Out of total 39 exploratory core boreholes, 24 boreholes results are shown negative & max depth of mineral present is 2.7m (RAT-4), therefore average thickness of bauxite should be corrected. (c) The Reconcile & re-estimate the reserves & resources as per provision of MEMC Rule15 & deviation should be justified. (d) The non-mineralized/negative potential area should be clearly shown & area should be given in land used table. (e) The qualitative aspect of bauxite on page-20 has not been properly dealt. Some of the chemical analyses are quite old. Recent sample analysis report is to be submitted.

04. Mining- Page-23-25,(a) The quality/grade of bauxite of salable & mineral rejects in table A2.4 should be given. (b) The year wise production & development proposal should be given for rectification & formation of benches in regular manner. (c) The max depth of mineral present is 2.7m (RAT-4) in borehole, therefore average thickness of ore body & non-mineralized/barren land should be clearly in production & development sections. Reconcile & corrected the estimation of annual targets. (d) It was observed during inspection that method of mining is being done by Rock-breaker & excavator-tipper combination without primary deep hole drilling & blasting proposed. Only secondary J/H drilling & blasting proposed, as & when require. It needs correction & modification. (e) The land degraded area in proposed/existing plantation should be given in financial assurance. (e)The adequacy of man & machinery, calculation & their capacity should be discussed & justified. (e) It was observed during inspection that mining operation done unsystematically & so many pits developed & formed in lease area. It should be proposal for rectification of irregular pits from one side to other & formation of benches in regular manner in plan period. It needs modification. The mineral reject generation @10% is on higher side. Its analysis report is to be submitted. Table given on page-25 is confusing. Possibility of selling, if by blending also to be worked out. Extraction of mine out area, but proposal for restoration has not been made.

05. PMCP-Page-42, (a) it was observed during inspection that rate of survival is poor in existing plantation area (by forest deptt.) Therefore further plantation/afforestation should be proposed in gap area & same should be given degraded land used area. (c) Page 55-58, tables should be modified as per above scrutiny. (d) The aesthetic environment of area is requiring more attention to continue 5-Star rating of mines.

06. Financial assurance, Page-67, -(a) It should be reconcile & furnish the break-up of entire degraded land including lease area not declared for matured plantation/gap filling area. (b) The non-mineralized area should be given in others. (c) 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)

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

Plan & sections: -

Key Plan: Land use status i.e. Govt. land, private land & forest land, wind rose diagram etc must be shown by different colour code.

Surface Plan: The index & legend should be modified & effectively shown with different colour code. It needs correction. The OB/ROM stacks/mineral rejects should be effectively shown. 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, mine pits with G1, G2, and G3 level of exploration should be judiciously shown. The Collar level of drilled borehole & field RL of hole should be reconciled & corrected.

Production & Development plan& sections: The plan & section should be updated & modified yearly, irregular bench height should be proposed for regular, top & bottom RL & area etc. The litho of production & development section should be same as shown in plan. It needs correction. The year wise proposal should be modified as per above scrutiny. The non-mineralized area of 24 negative boreholes should be proposed for plantation/afforestation.

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.

Reclamation Plan-Existing & suggested proposed afforestation should be shown properly with retaining wall, water harvesting pits & fencing in barren land & gap filling area.

Financial Assurance Area Plan- The land used details should be cover entire degraded land & barren land should be given separately & matching with details given in table & text.

Annexure:

1. The copy of renewal application submitted to State CGM for extension of lease as per provision of "The mineral (mining by Govt. Company) Rules 2015" should be submitted in further submission.
2. Field photographs of mine workings, lease boundary pillars with number, RL, latitude and longitude as provision of MCR, 2016 should be submitted.
3. Latest Quarterly monitoring report on air, water & noise is not enclosed as per category of the mine for duly signed with date & place.
4. All Geological reserves/ Blockable reserves calculation & Year-wise production & development calculation tables should be annexed with relevant chapter / text of document.
5. The copy of original valid BG of extended period should be submitted in the form of annexure.
6. 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.
