

Scrutiny comments on examination of Review of Mining Plan with Progressive Mine Closure Plan in respect of Kenedy Bauxite Mine, Survey No- 506, over an area of 1.2362 hectares in village- Kenedy, Taluka- Kalyanpur, District –Devbhumi Dwarka, Gujarat State submitted by Shri D.K. Raichura, Partner of M/s. Saurashtra Calcine Bauxite & Allied Industries under Rule 17(2) of MCR,2016 & 23 of MCDR 2017 for five years excavation proposals from 2018-19 to 2022-23.

1. Reference of MCDR, 1998 given in all the certificates, text report, annexure, etc. may be changed in view of recently notified MCDR, 2017.
2. Year wise bauxite production figures reported for approved plan period from 2014-15 to 2017-18 are mismatched with online annual returns for the said period.
3. This draft Review of Mining Plan is submitted by the Partner Shri D.K. Raichura but resolution passed by all the Partners for authorising him to submit this document is not enclosed. Moreover, under the registration of Firm, the name of Sh. D.K. Raichura is also not included. Further, copy of partnership deed which is in Gujarati language may also be provided in English language for easy understanding.
4. Final 3 copies of ROMP with PMCP and all required plans/sections should be given in single bounded text report manner to avoid misplacing of drawings and text report.
5. **Cover page-** Excavation proposal wrongly mentioned as “mining plan” which need to be rectified, given excavation proposals may be reviewed in view of previous execution of mining lease period. Further, extended ML period as per MMDR Amendment Act, 2015 also not mentioned.
6. **Introduction-** Mining lease grant details not given in chronological order and in detailed manner, Environmental Clearance, CTO & CTE details with all facts not furnished, details of existing ML/PLs held by the lessee has not been furnished. Whole chapter need to be redrafted.
7. **General:**
  - a. Mining lease executed on 21.05.1983 and extended mining lease period would be till 21.05.2033 as per the MMDR Amendment Act,2015. Hence, extension of mining lease for 50 years from the date of execution as per MMDR Amendment Act, 2015 should be submitted else document shall not be considered for approval. b) Updated & current list of partners may be provided. Further, it has mentioned that Shri D. K. Raichura is having power of attorney which is not acceptable and resolution passed by the entire partners in this regard may be provided. c) Mining lease boundary pillars & its latitude-Longitudes not found as per the statutes as observed during the site inspection. Given GPS co-ordinates of BP are no more allowed and same should be furnished as per DGPS in view of CCOM circular 2/2010/MCR/2016.
8. **Chapter-2: Location and Accessibility :** Mining lease area is mentioned as Private land, in this regard revenue details including name of land owner, type of land, etc. For this purpose, copy of 7/12 may also be enclosed. Further, under the details of lease area, topo-sheet no. is not furnished.
9. **Chapter-3: Details of approved Mining Plan/Scheme of Mining:**
  - a. Date and reference of earlier approved MP/SOM not given correctly since execution of mining lease. Further period of approval document not given in detailed manner. b) Review of approved proposals Vs actual status in respect of exploration, reason for deviation in less production, year wise waste generation & year wise reclamation and subsequent achievement not given in correct manner. c) The copies of violations, show cause notices issued by IBM/MMS Nagpur & its compliance positions should be given clearly with necessary supporting documents.
10. **Part A: Geology & Exploration:**
  - a. Future exploration proposals need to be given as per the rule 12(3) of MCDR,2017 with an objective of bringing entire mineralized area under G1 category.
  - b. As mentioned, lessee has carried out the exploration by means of prospecting trial pits during last approved SOM period as well as in past. Necessary, supporting documents like intimation to IBM, analysis report, consolidated statement showing commencement and completion of exploration activities, etc. should be furnished.
  - c. Proposed exploration programme is not given correctly as very limited exploratory trial pits have been proposed during proposed plan period which is not meeting the criteria of rule 12(3) of MCDR,2017 with an objective of bringing entire mineralized area under G1 category.
  - d. As per the online annual return submitted for the year 2016-17, total mineable reserves under proved category (III) is furnished as 40221MT & total 7600 MT under probable category. Then how the proved reserves have been enhanced with adequate exploration. Justify the same.

- e. Methodology adopted for reserves and resources estimation in last approved SOM appears to be incorrect as parameters considered for lateral as well as depth of persistent for bauxite mineralisation also not as per MEMC Rules, 2015 and need to be corrected.
- f. Reserves & resource estimated as per last approved SOM and subsequent depletion of production carried out during plan period is not done and remaining R&R not furnished.
- g. Detailed calculation of reserves/resource estimation considering UNFC classification, MEMC Rules, 2015 should be given. Basic parameters like depth of mineralisation, bulk density of bauxite, various statutory barriers, etc. need to be addressed suitably in R&R estimation.
- h. The detailed calculations of 22818 MT as blocked reserves not given. The blocked Reserves/Resources under different statutory barriers like 7.5m barrier zone, railway line passing all along ML boundary, etc. should be given separately in tabulated form.
- i. How the re-estimation of reserves & resource carried out considering the whole ML area as mineralised up to the depth extent of 3.5m without adequate exploration. This is not acceptable and same may be reviewed in view of MEMC Rules, 2015.
- j. Feasibility report is not prepared as per the guidelines as most of important aspects like proper justification for awarding UNFC codes are not discussed in correct manner.

## II. Mining:

- a. When mining operation has been proposed by formation of single bench as depth of mineralization is restricted /proved up to 3.5m only then how the bench width is proposed as 10mts. Justify the same. Further, dimension of existing pits have not been given correctly.
- b. Quantity of mineral stock available in mine and closing stock reported in return should be discussed & justify with supporting documents. Further, mining working beyond statutory barrier of 7.5m also need to be discussed & justified with valid reasons.
- c. In proposed planning, it mentioned about recovery of 95% bauxite which appears to be unrealistic and need to be justified suitably. Further, at the same time production of 20% high grade & 80% low grade production which is conflicting with above narration. Moreover, constraints in achieving the same like generation mineral rejects in manual sorting, geological formation, etc. need to be thought of.
- d. Under proposed year wise excavation planning, blocks extents proposed under excavation not mentioned in term of co-ordinates pattern. Further, mRLs wise proposed production planning is completely missing.
- e. Drilling and blasting is proposed during the plan period for mining operation but the same not discussed in detailed manner and subsequent its specifications have also not been proposed.
- f. Adequacy of man and machinery, calculation and its capacity not discussed. Further, it should be clarified that HEMM used/proposed is own, hired or contractual basis with necessary supporting documents.
- g. Page-23-24: Conceptual mine planning is not given as per the guideline because adequacy of further exploration, present land use pattern, reclamation & rehabilitation aspects, conceptual land use pattern, etc. are not given.

## 12. Chapter 4: Stacking of Mineral Rejects/Sub-grade Material & Disposal of Waste:

- a. Quantity furnished under mineral storage appears to be incorrect w.r.t. previous narration. Further, detailed location for proposed dumping mineral reject is also not discussed.

## 13. Chapter 5: Use of Mineral and Mineral rejects

- a. Specification of buyers for high grade & low grade shown here is generalized, the same should be specific to this mine/lease only.

## 14. Chapter: 8, PMCP

- a. Page-33: The existing land use pattern wherein area furnished as 1.1960Ha under mining appears to be incorrect. Further, impact assessment is not given as per the guidelines. Generalised & merely repetition of previous chapter's text is done. Systematic remedial proposals and existing facilities to cater various environmental polluting parameters need to be discussed.
- b. Page-38: year wise area proposed under voids available and subsequent proposed for rehabilitation by making water reservoir seems to be incorrect. The same need to be justified correctly. Further, environmental monitoring proposals are not given. Moreover, under the proposed afforestation / plantation by 10 nos. saplings are not found appropriate.

- c. Area put on use at start of plan & additional area required during plan period appears to be incorrect. Financial area should be assessed correctly based on the actual area put to use as on date and subsequent additional area requirement during plan period. Further, the copy of original bank guarantee of extended period for A category of mines should be submitted in final submission of this document.

### Plates

15. **Key Plan:** Plan is not submitted with all the information as required under Rule 32(5)(a) of MCDR, 2017 as land use status including Govt. land, Pvt. Land, Forest land etc. not marked. Further, village boundary, other ML area, village road, etc. are also not shown.
16. **Surface plan:** Some of the mineral stacks are not shown, working within statutory barrier of 7.5m need to be justify, statutory barriers from Rly. line is not provided, during inspection Pit-2 was found as water logged but it is not shown over plan, Further, all other features like public road passing through ML, electric transmission line is any may also be marked suitably.
17. **Surface geological plan & Sections:** proposed exploration not marked correctly in grid pattern, area under different category i.e. (111), 121, 122 of UNFC not marked, strike/dip not marked, limited sections lines have been marked, various prominent features as shown on plan but not marked over sections, lithology incorrectly marked over sections, spot mRLs of existing pits have given in close pattern.
18. **Year wise working part plan :** Proposed production planning should be given considering actual pits positions/virgin area, etc., proposed mines haul road projection appears to be incorrect, proposed mineral and waste stacking with its locations not marked, ultimate depth of working, ultimate pit limits, advancement direction, etc. should be shown prominently, plan should be updated/modified based on latest survey work, year wise sections on same scales have not been provided, statutory barrier all along railway line passing all along ML has not been provided, year wise sections have not been provided.
19. **Environment plan:** The plan has not been prepared incorporating all details as per rule 32(5)(b) of MCDR'2017 as land use pattern within 500Mts zone are not marked, proposed afforestation/plantation not shown, surface features including human settlement, etc. not shown, monitoring stations in core & buffer zone not marked correctly, other MLs area with its lessee name not mentioned.
20. **Conceptual plan:** Incorrect representation given for conceptual planning as no provision for bench wise access to lower benches has not been shown, waste dumps have been marked incorrectly within proposed water logged pits at conceptual stage, existing pits wrongly shown under conceptual stage, ultimate depth of working not mentioned.
21. **Reclamation plan:** Para 8.3: the details of progressive mine closure plan is not depicted distinctly on plan. The year wise fencing, year wise plantation, Environmental monitoring stations, garland drains, mine water discharge arrangements, etc. have not been shown.
22. **Financial Area Assurance Plan:** The 5 year excavation proposal area not marked correctly, existing pit broken area and subsequent 5 years area proposed under excavation planning not furnished in hectares, the plan may be given by showing year wise area broken up at the start of MP period i.e. 01.04.2017 & additional area requirement during proposed plan period up to 31.03.2023, FA table should also be shown on plan.
23. **Annexure:**
  - a. Copy of resolution passed by all the Partners for authorising him to submit this document is not enclosed. Further, copy of partnership deed which is in Gujarati language also not provided in English language.
  - b. The latest chemical analysis reports of Bauxite ore/mineral rejects/waste etc. should be submitted from an NABL accredited laboratory.
  - c. Test report for bulk density of Bauxite ore considered for computation of Reserves & Resources should be submitted from an NABL accredited laboratory.
  - d. Copy of coloured field photographs showing present mine workings, lease boundary pillars with its nomenclature should be given.
  - e. Copy of grant order is not legible. List of all existing mining leases with all relevant details is not provided.
  - f. Land schedule indicating the type of land either private or Govt. with other details has not been provided.
  - g. Cadastral map showing granted ML area and its boundary pillars DGPS co-ordinates duly authenticated by concerned SG authority need to be submitted in final submission.
  - h. Exploratory prospecting pits samples analysis report has not been submitted.
  - i. The copy of adequate experience certificate of technical person who has prepared this document should be submitted in further submission.
  - j. Copy of original bank guarantee for extended period should be deposited in further submission for approval of this ROMP.

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