

Scrutiny comments on examination of Review of Mining Plan with Progressive Mine Closure Plan in respect of Kenedy Bauxite Mine, Survey No- 508, over an area of 1.4771 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. 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. Further, copy of partnership deed which is Gujarati language may be provided in English language for easy understanding.
2. At various places incorrect narration, incorrect construction of sentences, incorrectness in rules/acts, different period of last approved SOM, etc. have been furnished which need to be avoided in final submission.
3. 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.
4. **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 not mentioned.
5. **Introduction-** Mining lease grant details not given in chronological order and in detailed manner, Environmental Clearance, CTO & CTE details not furnished, other ML/PL held by the lessee not furnished. Whole chapter need to be redrafted.
6. **General:**
 - a. Mining lease executed on 21.05.1983 and extended mining lease period would be till 20.05.2033 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.
7. **Chapter-2: Location and Accessibility**
 - a. Mining lease area is mentioned as Private land, in this regard revenue details including name of land owner, type of land, etc. In this connection, copy of 7/12 may be enclosed. Further, under the details of lease area, details of topo-sheet no. is not furnished
8. **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 correct manner. b) Review of approved proposals Vs actual status in respect of exploration, reason for deviation in less production not given. Further, individual year wise waste generation & year wise reclamation and subsequent achievement not given. c) The copies of violations, show cause notices issued by IBM/MMS Nagpur & its compliance positions should be given clearly with necessary supporting documents. d) Ensure the production figures furnished for last approved SOM should be matched with submitted annual returns.
9. **Part A: Geology & Exploration:**
 - a. Under the regional geology, stratigraphic sequence, Upper Eocene age reported w.r.t. occurrence of Bauxite mineralisation appears to be incorrect & need to be rectified.
 - 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, etc. should be furnished.
 - c. Looking into the very less mining lease area of 1.4771 Ha., total bauxite production carried out since inception of mining lease to till date may be provided in order to ensure total mineable reserves position of ML area as on date.
 - d. Chemical analysis report of bauxite/intercalated waste/mineral rejects/metallurgical grade of bauxite, etc. may also be submitted from NABL accredited laboratory. Dimensions of existing pits not given correctly.
 - e. The entire ML area placed under proved category (111) without adequate exploration is not acceptable. As per MEMC Rules, 2015 for G1 level the depth continuity of mineralisation may be considered limited to the depth upto

which direct evidence of mineralisation is established. For lateral extension of mineralisation should also be considered as per the provisions of MEMC Rules, 2015.

- f. Reserves & resource estimated as per last approved SOM and subsequent depletion of production carried out during approved 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, avg. quality of each pit, etc. need to be addressed suitably in R&R estimation.
- h. 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.

10. Mining:

- a. Dimension of existing pits have not been given correctly as the depth of the pits have not been mentioned. Further, proposed method of mining including details on mines haul road gradient, slope of working benches, working shifts, etc. have not been discussed.
- b. 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.
- c. Mining plan period is incorrectly mentioned as 4 yrs. Which need to be rectified, about proposed mineral stacks, waste dumps locations have not been discussed. Avg. thickness of bauxite is considered as 5 mts and bauxite at existing pits floor almost exhausted then how the production planning is given for remaining 1.5mts. Justify the same.
- 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 is completely missing. Further, year wise production proposals should be in align with grant EC quantity.
- e. Railway line is passing all along ML boundary at northern side but neither it is discussed in chapter nor any leaving of statutory provisions has been given. 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.
- f. Page-23-24: Conceptual mine planning is not given as per the guideline because adequacy of further exploration, present land use pattern pit, reclamation & rehabilitation aspects, conceptual land use pattern, etc. are not discussed.

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

- a. Disposal of overburden top soil and mineral waste are not discussed in detailed manner. Its locations are also not marked prominently in relevant plans. Further, detailed location for proposed dumping mineral reject is not discussed.

12. Chapter 5: Use of Mineral and Mineral rejects

- a. Generalized specifications have been given for Abrasive, Refractory, Metallurgical & Chemical grades. But, their actual Al₂O₃% ranges for consideration of these categories have not been discussed. The same should be specific to this mine/lease only.

13. Chapter: 8, PMCP

- a. Page-32: The existing land use pattern wherein area furnished as 0.5132Ha under mining appears to be incorrect. Further, impact assessment is not given as per the guidelines. Generalised & merely repetition of previous chapter's is done. Systematic remedial proposals and existing facilities to cater various environmental polluting parameters need to be discussed.
- b. Page-38-40: 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 in view of low survival rate in ML area.
- 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

14. **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, village boundary, other ML area, village road, etc. are also not marked.
15. **Surface plan:** Some of the mineral stacks not shown, working within statutory barrier of 7.5m need to be justify, statutory barriers from Rly. Tract is not marked, under inspection Pit-2 was water logged, Further, mark the other feature like public road passing through ML, electric transmission line is any.
16. **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.
17. **Year wise working part plan:** Area marked under proposed excavation in Sq.M. appears to be incorrect, Production planning need to be given in view of available mineable reserves as on date, year wise plan is not depicting with proper approach to faces, ultimate depth of working, advancement direction, etc., clear demarcation for year wise excavation is not made, UNFC category of R&R not marked, in section existing pits profile is not marked correctly.
18. **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 correctly, monitoring stations in core & buffer zone not marked correctly, other MLs area with its lessee name not mentioned, position of railway line is incorrectly marked.
19. **Conceptual plan:** Incorrect representation given for conceptual planning, No provision for bench wise access to lower benches has been shown, environmental protective works like fencing at ultimate stage is not marked, conceptual sections are not prepared correctly, OB stack marked within water reservoir pits at conceptual stage is incorrect.
20. **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, etc. have not been shown, year wise afforestation not marked correctly, ultimate pit limit also not marked.
21. **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.
22. **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.
