

**Scrutiny comments on examination of Review of Mining Plan with Progressive Mine Closure Plan in respect of Mewasa Bauxite Mine, Survey No- 141, over an area of 3.20 hectares (Private Land) in village- Mewasa, Taluka- Kalyanpur, District –Devbhumi Dwarka, Gujarat State submitted by Shri Krunal C. Patel of M/s. Harisiddhi Enterprises under rule 17(2) of MCR,2016 & 23 of MCDR 2017 for five years excavation proposals from 2017-18 to 2021-22.**

1. Mining lease was executed on 07.04.1986 for a period of 20 years up to 06.04.2006 and last scheme of mining was approved for the period 2015-16 to 2016-17. Therefore, considering the subsequent block period, next Scheme of Mining was to be submitted for the period 2017-18 to 2020-21 out of this year 2017-18 already passed hence this Review of Mining Plan period may be submitted for the year 2018-19 to 2020-21 for 3 yrs. period.
2. Lessee is neither filling the annual returns online nor submitting hard copies to the Regional Controller of mines. In this situation, the details of production achieved during approved plan period couldn't be reconciled. Hence, one sort of declaration may be given by the lessee that production is being reported by him is authenticated & correct at best his knowledge.
3. M/s. Harisiddhi is Partnership firm having total 2 partners and necessary partnership deed is enclosed. But, resolution passed by all partners in favour of Shri Krunal C. Patel as authorised signatory for submitting this document is not enclosed.
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-** Period of mining plan is wrongly mentioned as 2017-18 to 2021-22 which need to be rectified as 2018-19 to 2021-22 as the year 2017-18 is almost at the verge of completion, extended ML period with reference of MMDR Amendment Act, 2015 is not given, ML area either forest/Non forest is also not mentioned.
6. **Introduction-** Mining lease grant details not given in chronological order and in detailed manner, Environmental Clearance details not furnished with all facts, CTO & CTE details not furnished. Other ML/PL held by the lessee not furnished. It was observed during inspection that, mine working was done within 7.5m statutory barrier but it is not discussed. Further, weather mining is under operation or not during current year 2017-18 is also not reported.
7. **General:** a) Mining lease executed on 07.04.1986 and extended mining lease period would be till 31.03.2036 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) 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:** a) Total mining lease area of 3.20 Ha mentioned as Private. Land, necessary revenue details such as 7/12, land schedule including name of land owner, type of land, etc. may be provided. Further, extents of ML in the form of co-ordinates, details of topo-sheet no. etc. are also not furnished.
9. **Chapter-3: Details of approved Mining Plan/Scheme of Mining:** a) Date and reference of earlier approved MP/SOM not given in complete manner since execution of mining lease. b) Review of approved proposals Vs actual status in respect of ROM excavation, waste generation, and reclamation along with its deviation not given in correct manner year wise. Further, details of ROM excavation achieved during the current year 2017-18 as on date should be incorporated in the table. Also, details of locations from where a production is achieved may also be furnished. d) 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. Page-8: Under the regional geology, stratigraphic sequence with respect to litho-formation may be checked as upper Eocene period comprising of Bauxite mineralisation somewhere appeared as missing.
  - b. 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. How much ML area explored under G1 also needs to be furnished?
  - c. Page-9: In review of approved MP/SOM chapter it is mentioned that, lessee has made 3 trial pits but it is nowhere discussed under Para-1(e) regarding exploration already carried out. Further, details of previous exploration carried out by the lessee including intimation to IBM, sample analysis report, etc. should be furnished.
  - d. Proposed exploration programme is not given correctly as very limited exploratory trial pits have been proposed which is not meeting the criteria of rule 12(3) of MCDR,2017 with an objective of bringing entire mineralized area under G1 category.

- e. As the whole ML area is private land, hence the status of surface rights as on date may be discussed very precisely. The whole 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 reserves & remaining Reserves position as on date is not furnished. Detailed calculations of blocked reserves & resources have not been given. Further, Basic parameters like depth of mineralisation, bulk density of bauxite, various statutory barriers, avg. quality, etc. need to be addressed suitably in R&R estimation.
  - g. Whole exercise of re-estimation of reserves & resources need to reviewed in term of assigning UNFC codes, how much lateral extension of mineralisation to be considered, status of present exploration, proved depth of mineralisation, etc. need to considered very thoroughly. Further, total area under G1 level of exploration is also not mentioned.
11. **Mining: a)** The existing pit dimensions are incorrect as the depths of the pits have not been mentioned. Further, proposed method of working not given in detailed manner and not supported with description of haul road, mines working shifts, regarding deployment of mining machineries, etc.
- b. Year wise bauxite production proposed at the tune of 42030MT (Max) during plan period then for how much quantity EC is obtained. The proposed production capacity should be in aligning with granted EC. The production proposal should be restrict up to available five year block period of 2017-18 only, i.e. from Sep.,2017 to March,2018.
  - c. 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 also not given. Further, given drilling & blasting specification not in align with proposed semi-mechanized mining operations wherein bench height is proposed as 5mts.
  - d. Adequacy of man and machinery, detailed calculations and its capacity not discussed. Further, it should be clarified that HEMM used/proposed is own, hired or contractual basis with necessary supporting documents.
  - e. 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, post mining land use, anticipated generation of waste, ROM at conceptual stage, etc. are not given.
12. **Chapter 4: Stacking of Mineral Rejects/Sub-grade Material & Disposal of Waste:** detailed locations for proposed dumping of top soil & mineral reject is not discussed and also not marked on the relevant plans.
13. **Chapter 5: Use of Mineral and Mineral rejects:** Physical specification not given in detailed manner. Further, chemical 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:** Page-33: The existing land use pattern appears to be incorrect as the area of 0.1544 Ha under OB/dumping/Mineral stacks found to be less & same should be updated as on 01.04.2017 & further plan period 31.03.2023.
- a. Para-8.2, Page-35: Impact assessment to cater various environmental polluting parameters not discussed in detailed manner & necessary remedial measures, environmental monitoring schedule, etc. have not been discussed.
  - b. Under afforestation programme 20 saplings proposed to be planted per year during plan period appears to be incorrect and at least 100 to 150 saplings need to be proposed per annum considering less survival rate in the area.
  - c. Page-38-41: year wise area proposed under rehabilitation by making water reservoir seems to be incorrect. The same need to be justified correctly. Further, proposals of barbed fencing, environmental monitoring proposals, etc. are not given. Monitoring schedules of all environmental components should be given with respect to permissible limits & actual parameter in tabular form. Location of different monitoring stations as per IBM/MOEF guidelines and frequency of monitoring may be discussed in text in tabular form.
  - d. Land use pattern should be mentioned as on 01.12.2017 and subsequent plan period up to 31.3.2018. 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).

## 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, village boundary, other ML area, village road, etc. should be shown by different colour code. Barda Wild Life Sanctuary, Eco sensitive zone falls if near/within ML area should also be marked.
16. **Surface plan:** various mineral stacks as observed during site inspections have not been shown with its mRLs, available erected BP in the field not found with its latitude, longitude, mRLs as per the guidelines, working as marked under 7.5m statutory barrier need to be justified, Electric transmission line not marked correctly, the surface plan should be signed & certified by mine surveyor/mine manager with date & place.
17. **Surface geological plan & Sections:** ML area with level of exploration & Reserves category (111/211) as per MEMC Rule,2015 not marked, proposed exploration not marked correctly in grid pattern, lithology incorrectly marked over sections.
18. **Year wise working part plan:** year wise production projections not given in different colours/hatchings, Proposed production should be given considering actual pits positions, virgin area, etc., proposed mineral and waste stacking with its locations are not marked, ultimate depth of working, ultimate pit limits, advancement direction, etc. should be also be shown prominently, plan should be updated/modified based on latest survey work, year wise sections on same scales have not been provided.
19. **Environment plan:** land use pattern within 500Mts zone are not marked correctly, 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 lessees name not mentioned.
20. **Conceptual plan:** Incorrect representation given for conceptual planning as no provision for bench wise access to lower benches has been shown, proposed reclamation & rehabilitation area not marked correctly as various waste dumps have been marked within proposed water logged pits at conceptual stage.
21. **Reclamation plan:** Complete area marked under water reservoir is incorrect, 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:** Existing pit broken area and subsequent 5 years area proposed under excavation planning not marked, block wise area already reclaimed & rehabilitated also to be mentioned & highlight in hectare, 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 31.03.2022, FA table should also be shown on plan.
23. **Annexure:**
  - a. Copy of resolution passed by all the Partners for authorising Shri Krunal C. Patel to submit this document is not enclosed.
  - b. The latest chemical analysis reports of Bauxite ore/mineral rejects/waste and bulk density report of ore used for computation of R & R etc. should be submitted from an NABL accredited laboratory.
  - c. Copy of coloured field photographs showing present mine workings, lease boundary pillars with its nomenclature should be given.
  - d. Copy valid environmental Clearance, CTE, CTO are not enclosed.
  - e. Quarterly environmental monitoring reports on Air, Water & Noise are not enclosed from an NABL accredited laboratory.
  - f. Cadastral map showing granted ML area and its boundary pillars DGPS co-ordinates duly authenticated by concerned SG authority with date of signature need to be submitted.
  - g. Exploratory prospecting trial pits samples analysis report has not been submitted.
  - h. The copy of adequate experience certificate of technical person who has prepared this document should be submitted in further submission.
  - i. The copy of original valid Bank Guarantee of extended period should be submitted in final submission.

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