

**Scrutiny comments on examination of Review of Mining plan with Progressive mine closure plan of Dhamlej Limestone mine of M/s Somnath Minerals over an area of 4.0 hect. (Sur. No.689/1P) situated in village Dhamlej, Taluka Sutrapada, District Junagarh submitted under Rule 17(2) of MCR, 2016 and 23 of MCDR, 2017 for block period 2018-19 to 2022-23 & approval period 2018-19 to 2022-23.**

- 01.** Cover Page-The IBM registration number IBM/9150/2012 was issued for trading business activity therefore new IBM registration no needs to be apply as firm in mining business activity. Introduction has not been properly given. DTH hole cannot be considered systematic exploration and it can never be basis of reserve estimation.

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

02. KML file/Google image map/Authenticated DLR Map of lease area is not enclosed.  
03. Lease boundary Pillar coordinate is not matching with the Surface plan. Reconcile with DLR map & furnished.

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

04. The details of approval of mining plan needs to be given in para 3.1.  
05. The reason for excess production achieved in plan period is not discussed in remark column. (2015-16- Excess15.10%) Exploration by way of these DTH holes without any proposal in last approved mining plan does not appears justified & cannot be accepted.  
06. The dimension of existing trenches, number, location & true depth is not given. No benches were seen in field. Mining operations has been done irregular manner & deviated in Development, exploitation and environment monitoring in previous plan period. Give reason of it in remark column.  
07. The total ROM production achieved & total excavated area in lease is to be discussed. The production reported is not matching with excavation shown in the aarea.  
08. The copy of violation, Show cause letter etc. should be discussed & submitted. The online monthly & annual return to IBM website has not been submitted.

**Part-A**

**Chapter no. 1.0 Geology & Exploration**

09. Area is close to coastal line. Then ground RL of the area has been mentioned as 90mRL which is totally wrong. All the plans, section and topography description are not correct.  
10. Page-11-12 the 8-10m depth of mineralization without any true exploration is incorrect & not acceptable. The existing exploratory details of trenches/pits & true depth is not given correctly on page 12. There were no Core/DTH boreholes shown in field during inspection.  
11. It was observed during inspection that survey of lease area was not updated & correctly shown pits dimension, mRL of area on Surface Geological plan & section. The area should be re-surveying & submitted. The mRL of the area needs to be corrected.  
12. Page-12, The existing pit dimension, trenches is not correctly shown, it should be given the corrected resurvey of lease area & furnished. The broken up area existed seems more as shown on plan & section. It needs correction. The other details/information in tables at page-12, 13 is not given properly & correctly.  
13. Page-15, The Re-estimate the reserves & resources & detail calculation is to be taken only up to true depth of mineral area i.e.4-5m in irregular manner of pit/trench. It needs correction in entire reserves & resources. The Geological section shown is incorrect on DTH borehole. DTH is not acceptable. The section is to be shown up to true depth of mineral only (up to pit/trench depth), imaginary lithology should not be shown & acceptable. Entire reserve estimation wrong. Assuming limestone continuity up to 75mRL (24m depth from surface) is baseless. Since nothing exploration details/data available up to G3 level of exploration, therefore limestone below depth of pit/trench is not to be shown. Reserve & resource estimation calculation given on page no 13, 14, and 15 is total

wrong. mRL of lease area needs to be reconcile & corrected.

14. Page-15, 16, 17 Entire calculation & Tables needs correction as per above scrutiny.
15. In Entire lease area, minimum 04-05 core bore holes (near BP-A,B,C,E,X) up to 25m depth each or more is to be proposed in corner of lease area in minimum 400mx400m grid as per provision of MCDR, 2017. It needs proposal in plan & section.

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

16. In absence of survey & perfect exploration, entire limestone reserve is incorrect. Hence entire mining proposal is also wrong. It cannot be accepted.
17. It was observed during inspection that boundary pillar of lease area were not available in field nor erected as per statutes. The mining operation has been carried out and appears to be with in 7.5m of statutory barrier or outside lease area. It needs clarification.
18. The existing pit dimension & correct excavated area as per resurvey needs to be given.
19. Proposed scale of production is on higher side. It cannot be accepted for an area of 4.0 hect. with limited thickness based upon trench/pits.
20. Reduce the annual targeted production based upon the true depth of pit/trench of potential area & actual reserves available. It needs correction.
21. Plantation survival rate is very poor; therefore more plantations (100Plants/year) is to be proposed in present Review of mining plan.
22. Page-20, 21 annual planning & reduced optimum annual ROM targets are to be modified & corrected based upon the above scrutiny.
23. Page-22,23-The calculation of drilling & blasting is not required. It needs correction.
24. Conceptual mining: There is no OB/waste generation, therefore conceptual stage of mine may be water reservoir only after mineral exhausted. No reclamation is required except afforestation/embankment in 7.5m barrier.

### **Chapter no. 3 Mine Drainage**

25. The water table shown at 94mRL without any study is incorrect. Same should be based upon the field observation. The minimum & maximum depth of working shown same 84mRL, which is incorrect. Reconcile & corrected

### **Chapter no.8-PMCP**

26. The present land used pattern is to be given as on 01.4.2018. The table is to be modified by re-survey the lease area. Excavated area of 1.5726Ha shown is incorrect. It was observed during inspection that most of the lease area was worked in past & land used details needs to be corrected. Page-36, since no OB/waste proposed, then why 0.188Ha area proposed for dump. It needs correction.
27. Page-38, No of plants should be proposed 100 instead of 20 & survival should be about 80%. It needs correction.
28. Page-39-46, The plantation proposal should be given in "others" column instead of "Rehabilitation in waste land" column. Other environment protective measure of embankment wall is to be given.
29. Page-47, FA-Table & present land used details & area to be utilized in plan period needs to be corrected. Reconcile the table in PMCP & existing pit dimension & furnished. The detail calculation should be modified based upon above scrutiny.

### **Plan & Section:-**

30. **Surface Plan:** It was observed during inspection that in surface plan, excavation of lease area is not matching with field & further BP were not available in field. Re-survey the area & submitted in further submission. The surface plan & DLR map co-ordinates needs to be matching.
31. **Surface Geological Plan:** The BP co-ordinates reconcile with DLR, the instant lease area is mostly worked in past, and therefore survey needs updation. The existing pit, trenches with mRL, proposed core boreholes etc should be given. The geological axis of G1/G2 level of area is not marked. Lithology below depth of pit/trench is not to be shown in

sections.

32. **Production & Development Plan:** yearly proposal should be shown in G1/G2 level of area only & environment protective measure should be shown. Litho below depth of pit/trench is not to be shown in sections.
33. **Environment Plan:** plan has not been prepared & submitted. The position(s) of the adjacent leases are not shown on the Environment Plan; Land use in 60m/500m beyond the ML area is to be shown including human settlement etc.
34. **Reclamation plan:** The title of plate “Environment Management Plan” should be replaced as reclamation Plan.
35. **Conceptual Plan:** 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.
36. **Financial Area Assurance Plan:** Plan should be updated & modified as per above scrutiny. The land used details need to be corrected & submitted.

**Annexures-**

37. The copy of DLR map signed by authorized person & Lease sketch plan should be submitted.
38. The copy of field photographs of present mine workings, exploratory pit/trenches with dimension, location, Boundary Pillars with no; Lat & Longitude, mRL etc. should be submitted.
39. Latest few more chemical analyses of pit/trench samples from NABL should be submitted.
40. Quarterly monitoring of Air, Water, Noise, land etc. in last quarter has not been enclosed.
41. The copy of common boundary working permission in adjacent lease of RP Trivedi with in 7.5m of statutory barrier under MMR 1961 should be submitted.
42. The copy of valid BG/Original BG of extended period of lease should be submitted.
43. 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.

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