

SCRUNTY COMMENTS ON DRAFT SCHEME OF MINING OF H.P. MANJUNATH IRON ORE MINE (ML NO. 699) OF SHRI H.P. MANJUNATH, OVER AN AREA OF 3.03 HA AS PER ML DEED, AND 3.20 HA, AS PER CEC, IN JAMBUNATHANAHALLI VILLAGE, HOSPET TALUK, BELLARYDISTRICT OF KARNATAKA STATE. THE DOCUMENT SUBMITTED UNDER RULE 12 OF MCDR,1988, UNDER CATEGORY A-(OTFM-OTHER THAN FULLY MECHANISED MINE, FOR THE PERIOD FROM 2016-17 TO 2019-20. THE ML AREA IS COMES UNDER FOREST LAND.

COVER PAGE

1. Rule for submission of the document may be corrected as under Rule 12(2) of MCDR, 1988.
2. The online registration number should be indicated.
3. The forest land indicated need to be specified, whether reserve forest if any.
4. The private individual company needs to be specified.

INTRODUCTION

5. Entire chapter is found to be copied and pasted from the last approved Modified Mining Plan dated 28.01.2016 without omitting irrelevant information pertaining to this Scheme of Mining. In page-2, it is written that: "The Scheme of mining is submitting for changes of period of lease as per the amendment act of MMDR 2015" which is quite misleading & incorrect. In view of above, entire chapter (and the document) is required to be thoroughly revised and corrected.

DETAILS OF APPROVED MINING PLAN/ SCHEME OF MINING (if any).

6. Para3.1: Reference of the last approved Modified Mining Plan is not given.
7. Para 3.2: Furnished information is not correct.
8. Para 3.3: Review of all proposals should be furnished w.r.t. last approved Modified Mining Plan dated 28.01.2016, i.e. only for F.Y. 2015-16.
9. Para 3.6: Furnished information is not correct, since this draft Scheme of Mining is submitted under Rule 12(2) of MCDR, 1988.
10. Progress of R & R implementation work as on date should be discussed in this chapter.

PART-A

11. Para 1.0 (i): Float iron ore zone which is located at southern side of the ML, is found to be explored under G-2 stage of exploration, the same area is required be explored under G-1 stage by proposing few additional trial pits/ few RC drill holes. In view of that, future exploration programme may be revised.
12. Para 1.0 (j): Recovery of float iron ore is considered as 60% which is unusually high in view of the physical properties of float ore where fines are more prominent. Basis of consideration of the recovery% may be deliberated here; a recovery analysis test for float iron ore may be annexed.
13. Para 1.0 (l): This para is not found to be included in the document as per the standard guideline of preparation.
14. Page 28: In all 'blocked ore' tables, headings should be corrected as 'Blocked ore Resources'. Geologically proved (by G1 stage of exploration) blocked ore below UPL should be placed under UNFC Cat. 211, Not under Cat. 221. In view of that, Reserve & Resources table in page 29 should be corrected.
15. In para 2A(a), the proposal mentioned as semi-mechanized is not appropriate, it should be given as A
16. – (OTFM-other than fully mechanized) mine, using HEMM machineries along with manual labors for mining work for various purposes. Besides, the details of mining operation given without any concept of the ML area and the type of deposit/ rock present in the area, by stating mine operation involves blasting, same para it is given, the strata if soft, and it can be excavated without

use of drilling & blasting. The proposals should be modified, as discussed in the field to re-locate the location of working on the higher elevated area in the insitu formation/ deposits, instead of float area, as per the draft proposals. The whole proposals and the calculations of development/ production etc., should be modified. From the plate No.6A, from eastern end of the ML area towards western end, i.e along section 1-1', instead of location proposed in the float area. In the light of the above remarks, the remaining period of workings from 2017-18 to 201-20 should be undertaken from top RL to bottom RL for scientific & systematic workings and changes in the text and plates may be attended accordingly.

17. Para 8.3.5: Summary of year wise proposal for item no. 8.3 may be prepared in this following format as per new 2014 guidelines:

Items	Details	Actual position (as on date)	Year-wise proposal				Remarks
			2016-17	2017-18	2018-19	2019-20	
Dump management etc.(Ref. guidelines)							

(This summary can be prepared in a landscape form)

18. Para 8.6: Financial Assurance table is not found to be prepared in accordance with CCOM circular no. 4/2006. Bank Guarantee of Rs. two lakhs against financial Assurance should be valid up to 31.03.2020 or till the end of this Scheme period. Enclosed copy of the BG is valid only up to 23.05.2018.
19. Para 8.7 and 8.8: This paras may be removed from Part-A. Certificates, Plans & Sections are to be furnished in Part-B.

PART-B

20. Para 10: PLATES

- a) Geological Plan (Plate no. 4): Dip & Strike of the ore body are not found to be demarcated in the plan, index of the trial pits are not given. The iron ore deposit is shown in such a way that the deposit is 100% recovery in the insitu reserve.
- b) Geological Sections (Plate no. 5): UNFC Category (viz. 111,122, 211 & 222) are not demarcated within the cross sections. Blocked ore below UPL should be demarcated in all sections.
- c) Production & Development sections(Plate No.6A): The proposals drawn for the year 2016-17 is not appropriate and accordingly, it was discussed and advised to propose from the top RL .e. from eastern end to western end, along sections 1-1', given in text part also. In the light of the above remarks, the remaining proposals may be modified to work from top to bottom.
- d) Conceptual Plan & sections (Plate No.8 & 9): The conceptual plan & sections were not attended to the reality, what will be position at the time final closure of the mine. From the geological sections, the insitu deposits reveals, if it is extracted, and later the ultimate pit slope will be left behind. From that, what is extent of area is proposed for back filling with the available waste and possibility of conversion of water reservoir if in part, should be dealt accordingly, instead of showing complete back filled and planted. The plan & sections should be attended and modified.
- e) Environment Plan(Plate No.10): The other ML areas present within the 500m buffer zone should be brought out for reference.

21. **Para 11, ANNEXURES:** In some cases, annexures nos. are not matching with the document, may be corrected accordingly. Following items are required to be annexed with the document:

- a) Copy of recovery analysis report of Float iron ore.
- b) Latest four season's environment monitoring report.
- c) Copy of the Bank Guarantee, valid up to 31.03.2020 may be submitted.
- d) A letter of undertaking from the lessee in Rs. 100/- stamp paper (non-judicial) stating that no matter is pending in the lease hold area on the following issues:
 - i) Related to illegal mining with State Govt.
 - ii) Royalty and revision matter with the State Govt.
 - iii) Safety & Environment issues of general public concern
 - iv) Public Interest Litigation (PIL) & court cases, etc.

This may be submitted **in original** to this office & copies to be annexed with the document.