

SCRUTINY COMMENTS ON EXAMINATION OF MINING PLAN OF **BETLA GRAPHITE MINE** OF M/S PARIJAT MINING INDUSTRIES (I) PVT. LTD. OVER AN EXTENT OF 7.216 **HECTARES**, LOCATED IN VILLAGE BETLA, UNDER LATEHAR DISTRICT OF JHARKHAND STATE, SUBMITTED UNDER **RULE 17(2) OF MCR, 2016**.

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1. Any documental evidence of extension of Mining Lease period is to be attached.
2. 6.073 Ha. of land is Rayati Land (Private land of the Local People) and 1.141 Ha. Of GM Land which has to be transferred from the local people (land owners) before the mining activity is started. Any documental evidence for the transfer of land is to be attached for the land within the lease area in which the proposals for mining are proposed.
3. According to last approved Scheme of Mining Financial assurance was to be submitted in the office on or before 28/09/2015 which has not been done till date.
4. As per last approved Scheme of Mining bearing letter no. RAN/LAT/GRP/MS-01/2014-15 dated 04/11/2014 point no. (xiv) a copy of EIA-EMP report as approved by MoEF has not been submitted to this office.
5. On inspection it was found that boundary pillars does not contain any latitudes and longitudes of the pillars marked on it, further DGPS Survey report is to be attached with the document.
6. As mentioned in the introduction chapter the Scheme of mining was not prepared for the year 2001-02 to 2005-06, 2006-07 to 2010-11 2011-12 to 2013-14 due to local disturbances (law& order problem) in the area but as per office records production has been done by the lessee and reported also.
7. Category of Mines was “B” Manual when it was approved on 1996 but now it is mentioned that category of mine is “A”, no such intimation is received as per office record for change of category of Mines. Further as per Annual returns only Diesel Pumps has been used for dewatering in the mines.
8. Pg. 11 point 3.5 mention the reasons for non-operation of mines as the mines is not in a working state.
9. In pg. 17 & 18 it is mentioned that 21 nos. of graphite veins were exposed after careful study and mode of occurrence and quality and extension of graphite veins were found. Attach a copy of the report.

10. Till now no exploration has been carried out and the reserve estimated under Proved Mineral reserves (111) category as on 1/04/2016 is 97605 tones. Further feasibility report has also been submitted for the deposit to be feasible. The reserves and resources estimated should follow the UNFC Guidelines.
11. The ambient air quality, flue gas, effluent, soil, surface water, noise level monitoring reports in respect of Chirodih Bauxite mine has not been enclosed, which should be submitted.
12. Complete chemical analysis for entire strata for all radicals maybe undertaken for selected samples from a NABL accredited Laboratory or Governmentlaboratory or equivalent. Entire mineralized area may be analyzed meter wise with 10% of check samples. (At least for 10% of total samples may be analyzed in accordance to BIS and reports from NABL accredited/other government laboratory).This has not been placed in the document.
13. The DGPS surveyed map/plan in compliance to CCOMs circular No.2/2010 and its addendum dated 21.09.2011 & 11.06.2014 regarding geo-reference cadastral map has not been submitted. Moreover, the undertaking submitted in compliance to the CCOM's circular No. 2/2010 is not acceptable at present.
14. In case of individual or partner, a declaration/affidavit should be submitted to know whether he is working in other firms/company/organization etc.
15. On examination of the copy of the lease deed enclosed as annexure-II to the document, few pages of the same is not clearly legible, thereby a fresh copy of the lease deed should be submitted replacing the enclosed one for clarity.
16. The chemical analysis report in support of grade of the graphite from Sun-Tech has been enclosed as annexure-VII but the report is old one, analysed on 09.03.2014, instead a fresh report for the same should be submitted. Moreover, the address of the company given in the analysis report is different from the consent letter, certificates, undertakings & declaration enclosed along with the document. Therefore, necessary incorporations / modifications may also be made accordingly.
17. The excavation planning for the period from 2017-17 to 2020-21 has been computed & enclosed as annexure-IX but the length, width of benches proposed in topsoil, overburden & graphite ore zone has not been furnished. Besides, the location co-ordinates & considered for the purpose is missing, which should also be furnished by adding more columns in the tabular annexure. Moreover, the recovery of graphite ore is considered as 80% but the basis on which such recovery is considered should be justified with valid reasons. So, also the grade of the recoverable graphite may be furnished supported by authenticated chemical analysis report. Likewise, the waste generation is indicated to be 20% but the basis for such generation has been considered also not mentioned, which should be furnished indicating the grade of such waste material. Accordingly, necessary corrections/modifications may also be made in connected paras in the text & in relevant plates.

18. Dimension (L x B x D) of the void available for backfilling has not been furnished in 3<sup>rd</sup> row of the 1<sup>st</sup> page of the enclosed annexure-XII and the same should be given, indicating the name of the quarries linked in the void formation. Accordingly, the information furnished for the period from 2017-18 to 2020-21 in the above referred annexure may also be revised.
19. A flow sheet of the graphite beneficiation unit has been enclosed as annexure-XIII but the name of the mine is missing in the flow sheet, which should be indicated and the annexure may be revised accordingly.
20. Few photographs of the existing quarries, dump(s) & boundary pillars has been enclosed as annexure-XXII to the document but the location co-ordinates of the existing quarry & dump(s) is missing, which should be mentioned. Moreover, no photograph in support of existing plantation & exploration has been enclosed, which should be submitted for ease in monitoring.
21. A copy of the explosive procurement license and a copy of the blasters license as required for carrying out blasting operation in the mine have not been enclosed, which should be submitted.
22. The flue gas, effluent, soil, surface water, noise level monitoring reports in respect of Betla graphite mine has not been enclosed, which should be submitted.
23. The copy of the Bank Guarantee matching to the excavation planning for the entire five years period of the mining plan has not been enclosed and the same should be submitted.
24. The phone/fax & E-mail ID if any of the mine address given in the para under reference may be indicated. [Chapter-II (a)]
25. In the 1<sup>st</sup> table given under the heading **Insitu Tentative Excavation**, the percentage of graphite ore production is missing, which should be furnished, indicating the basis of such recovery and the para may be revised accordingly. [Para 2.0(B)(I)]
26. Tentative dimension of the benches proposed to be made in overburden & graphite ore zone should be specified. Accordingly, necessary incorporations/modifications may also be made in para 2.0(d) & 2.0(e) and other places of the document. [Para 2.0(C)]
27. Under the heading **anticipated life of the mine**, 20% of the mineable reserves are considered as intercalated waste but the basis on which such consideration has been taken into account should be justified with valid reasons. (Page No. 39)
28. The quality of water encountered in the area is missing, which should be furnished for more informative. Moreover, the topography of the lease area furnished in the para appears to be not correct, which should be revised based on the actual facts & figures. [Para 3.0(c)]

29. The graphite contains 16.14% fixed carbon but no chemical analysis report in support of such grade has been enclosed. Besides, the cut-off grade of graphite also not furnished and the same should also be furnished considering the thresh hold value fixed for graphite mineral. (Para 5.0)
30. Under the heading **Propose Man Power Deployment in future**, a 1<sup>st</sup> class mine manager as required under MMR, 1961 has not been proposed under employment, which may be incorporated. Besides, a full time mining engineer holding degree in mining Engineering may also be deployed since the mine falls under category A-OTFM. (Page No.54)

### **PLAN& SECTIONS**

31. UNFC code is to be mentioned in Geological Plan & Sections.
32. In Geological plan all the geological features, DIP, Strike lithologies with different color coding should be shown.
33. Mode of entry in the mines and as per proposal entry for mining machinery is not shown in relevant plans.

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