

**Discrepancies observed in the Review of Mining Plan of Dongri Buzurg Mine (Area-53.98 Hect.) of M/s MOIL Ltd., located in Tehsil Tumsar, Distt. Bhandara (Maharashtra), submitted under Rule 17(1) of MCR, 2016**

**Field Observations:**

1. Black/sub-grade dump and waste dumps are quite close to each other as seen during the site inspection. Thus suitable precautions must be taken to avoid any intermixing.

**Text and Plates:**

1. Proposals have been submitted for 2017-18 to 2021-22 period in which first quarter of 2017-18 has already been elapsed. Therefore, actual status for all the proposals as on date should be informed alongwith the proposals for prospective period.
2. RQP has been removed in the new MCR'2016. Therefore, the term 'RQP' wherever mentioned should be deleted and suitable documents in terms of Rule 15 of MCR'16 should be enclosed for the qualified person and RQP certificate enclosed should be removed from the document.
3. On page number 1 in the first para, Toposheet number mentioned is 55 O/14 which is incorrect as per the key plan enclosed. It should be corrected.
4. As per the information given on page number 2, proposed production is exceeding the granted EC. Thus an undertaking should be enclosed from the nominated owner stating that the production shall be kept within existing EC limits till fresh enhanced EC is obtained/granted by MoEF.
5. Lease period as mentioned on page number 4, item 2.0(a) is incorrect as per the enclosed executed lease deed. Therefore, it should be suitably corrected.
6. As per the land schedule given on page no. 5, surface rights status for 0.69 ha private land should be informed.
7. Under item 3.1 on page number 6, full details in chronological order upto the last document approved for the lease area should be given.
8. Under item 3.3.4 on page number 8, it is mentioned that 'rejects having Mn content less than 25% will be stacked in the area'. Over the statement, the following items need to be justified/taken care of (as applicable):-
  - (i) Whether the lease area is being used for dumping of rejects/sub-grade generated in other leases (as item 3.3.4 has reference of 46.25 ha lease also)? If yes, then it should be stopped immediately in compliance to the order of Hon'ble Supreme Court which says that no dumping should be done outside the lease area. Also, any transport of material from the lease area can be done only after payment of royalty. Thus it should be clarified.
  - (ii) If the answer for item number (i) is 'No', then source of the rejects being stacked should be informed because the area has only black dumps and no in-situ deposit is there. Also, the lower limit of Mn content (upper limit is 25% as per 3.3.4) in the rejects should be informed which is being stacked.
9. In the 'Geology and Reserves' chapter:-
  - (i) Except 'Regional Geology', all other aspects need to be discussed for only the lease area under consideration.
  - (ii) It is mentioned that the lease area is in the footwall of the deposit. In such case, no in-situ deposit shall occur in the area except the additional ore bodies, if any, proved through exploration in the area. Thus the details should be modified accordingly.

- (iii) As the lease area is having only dump workings, exploration details for the dump reserves should be given supported by suitable feasibility study for the dump reserves only.
- (iv) Any borehole drilled in the lease area alongwith its outcome should be informed. Form 'I' and 'J' should be enclosed for such boreholes.
- (v) Reporting of reserves as per MEMC Rules'2015 should be given.
- (vi) Future exploration, if any, should be given i terms of Rule 12 of MCDR'2017.
- (vii) Information as mentioned on page numbers 21-22 for the lease area 53.98 are incorrect and should be corrected.
- (viii) As mentioned on page number 22 for justification for UNFC category, underground mining is proposed for exploitation of reserves. But as also mentioned earlier, the area is in footwall side. How the occurrence of orebody is established in the lease area?

10.I the 'Mining' chapter:-

- (i) There are two types of mining proposed in the area-one, inn form of in-situ development that will support the production in the other lease area and other, in form of dump mining for production of ore from the lease area. Therefore, both should be dealt separately under separate headings. Lastly, a final table for the material handling for the lease area should be given.
- (ii) On page number 23, in the second para, it is mentioned that 'horizontal slicing method of mining has been adopted in this mine for both extraction of ore and development'. But the lease area under consideration is under development stage only. Therefore, suitable corrections are required and information pertaining to the lease area should be mentioned-for development and for dump mining.
- (iii) Records of waste generated from the lease area should be kept separately and dumping of waste should be done within the lease area only.
- (iv) On page number 27, apart from total in-situ excavation from all the lease areas, details for the area under consideration should be given separately.

11. As per the information mentioned in the details of dump mining given on page number 27 and the table given on page number 30-31 regarding material handling from the dump, the following should be informed:-

- (i) 40000 T of material will produce 6000 T of cleaned ore and 34000 T of rejects. Grade of the cleaned ore is +25% Mn and grade of rejects is 17-20% Mn. Furnish comments on the material having 20-25% Mn.
- (ii) As per the information mentioned, there should be three types of dumps- (a) Black dump which is being proposed for exploitation, (b) Waste dump & (c) Rejects dump having material 17-20% of Mn content. But there are only two types of dumps presently available / proposed at the site. Justify giving the management of generated 34000 T of rejects from the dump workings.
- (iii) With the set of figures mentioned in the table for the material handling from the black dump, it reflects that complete black dump is having +17% Mn content (rejects-17-20% Mn and cleaned ore +25% Mn). Threshold value for Mn is +10%. In such case, what is the purpose of recovery whereas complete material is under reserves category?
- (iv) Will there be no generation of material containing +10-17% Mn or material which is complete waste may be informed.

12. Details and specifications of all dumps available in the area should be informed. Specification of the dumps should be shown on the relevant plates also. Area covered

under each dump and quantum of material should be informed (area should coincide with the area as given in the FA table). For waste dumps, number of terraces should also be informed.

13. Conceptual mine planning need to be modified in line with the modifications as per the discrepancies. Accordingly plates should be modified if required.
14. Environment monitoring should be discussed alongwith showing the locations of the monitoring stations on the relevant plates.
15. The area details as shown in the financial assurance table should be corrected as:-
  - (i) Additional area required for the development purpose only needs to be given in the 'area to be excavated'.
  - (ii) Overburden dumps area should be corrected.
  - (iii) Mineral storage area is in form of mineral stacks and black dump. Black dump is having area of 2.50 ha (refer page number 27) which has been shown on the plan but rest of the area i.e. 8.01 ha has not been shown on any plate. Land use as mentioned in the table should be shown on the relevant plates. Further, additional area requirement may be justified in the mining chapter.
  - (iv) Plantation area has not been mentioned. Hence, dump plantation area should be informed (it should not be considered in the net area for calculation of FA).
16. Use of mineral should be given only for the lease area under consideration.
17. Details of financial Assurance should be given on page number 63 and a copy of FA should be enclosed with the document.
18. Forest clearance has not been enclosed for the forest land of the lease area.
19. As per item A(ii) of the 'Specific Conditions' of granted EC, waste dumping proposals should be modified and each stage of the dump should be maintained for 10 m instead of 30 m (as shown in the plan/sections for the dump).

**Plates:**

1. All the plates should bear the reference of the document under submission.
2. Date of survey should be mentioned.
3. Scale of the plates is not matching with the grid values. Such as, scale of the surface plan is 1:2000 whereas grid interval shown is 100 m. It should be suitably corrected on all the plates.
4. Surface Plan: Demarcation of Forest and Non-forest land should be done on the plan.
5. Geological Sections need to be enclosed-both L-section and T-section.
6. Year-Wise Development and Production Plan and Sections: Year-wise plans have been given for part of the lease area only. Separate year-wise plans should be submitted for complete lease area showing dynamic position of benches for development, dump workings, waste dumping and any other allied mining activities in the lease area. Accordingly sections should be re-drawn and submitted.
7. Environment Plan: Incorrect plan has been submitted. Environment plan should be submitted as per the provisions of Rule 32(5) (b) of MCDR'2017 showing the prominent surface features within 60 m and 500 m radius as per the provisions.
8. Financial Assurance Plan: Area put to use at the start of SOM period and area required during the 5-years period should be shown distinctly on the plates and land use table should be shown on the plate for the calculation of FA. Development area has been shown distinctly but it is not the additional area required during the proposal period. Therefore, suitable corrections should be done.