

Scrutiny comments on examination of draft Modification of Mining Plan in respect of Haldipur Limeshell Mine (M.L.No.2374) over an area of 24.68 ha in Non-forest, B-Manual - Category Mine situated in Haldipur Village, Honnavar Taluk, Uttara Kannada District of Karnataka State submitted by M/s. Gajanan Mines under Rule 17(3) of MCR'2016 for the period 2016-17 to 2020-21.

**General:**

1. Cover page has to be change as Modification in approved Mining Plan and their rule also has to be change. All changes have to make on concerned pages. On cover page, the plan period is mentioned from 2016-2017 to 2020-2021 but the year 2016-2017 and 2017-2018 has already completed and there is no meaning of proposal for this year.
2. All the annexure to be properly indexed/ numbered/ paged and signed by qualified person. Plate & Annexure Nos are wrongly filled in some places.
3. In the previous approved plan, the condition has been mentioned to carry out DGPS survey within 180days whereas more than 5 years has passed till the Lessee has not submitted the DGPS plan. The copy of DGPS plan duly submitted to State DMG for authentication should be discussed & given with supporting documents.
4. Registration number under Rule 45 of MCDR-1988 is not mentioned and email id of the lessee is not mentioned.

**Location & Accessibility:**

5. Para-2.a:- Date of grant of lease and date of expiry is wrongly given.
6. Co-ordinates of ML area are not coincides with plans and page to page, hence it has to be corrected based on DGPS co-ordinates only. Village name also differ in page-2.
7. Page-3: Survey numbers has been shown in others category and specification has not given.

**Details of approved Mining plan/ Scheme of Mining:**

8. The mining scheme approved during 04.04.2013 has been not shown.
9. The review of earlier approved proposal of Exploration, Excavation & Afforestation has to be shown in table format for year wise.
10. The proposed & achievement should be mentioned as per approved mining plan proposal i.e. Latitude & Longitude /RL etc. & actual workings done should be discussed in tabular form with proper justification.
11. The lessee has not operated from 2012-2013 for want Non Agricultural clearance letter, then copy of Non Agricultural clearance letter has to be submitted.
12. The last five years violation, show cause or suspension and their compliances is not discussed properly. The mining operations in the mine has been suspended on 05.02.2015 and recommended for determination of mining lease on 20.05.2016 to state DMG. Hence a copy of letter is needed from State DMG for validity of Mining Lease as on date and NOC for approval of present document.
13. It may also be clarified that why the monthly returns and annual returns has not been submitted to IBM, Goa office for last more than 5 years.

**Geology and Exploration:**

14. Under Geology of the lease area type of the deposit, shape and size of the ore body, structural features if any needs to be discussed.
15. It was observed during the inspection that lease area is partial submersed in water and there is no exposed pit of Limeshell and no exploration has been done. Therefore, estimation of reserves needs to be justified.
16. The proved Limeshell reserves estimated and stated is replenished in nature every year in tide of sea waves but it is not sure that how much quantity of reserves may be available every year. It is not discussed properly.
17. UPL has to proposed upto proved depth only. No extrapolation has to be considered for estimation of reserves & resources. Beyond & below the proved depth, it should be considered as resources as per above said rule.
18. Detailed estimation sheet for reserve and resources need to be furnished showing sectional area as per UNFC category, influence, BD, recovery factor, location on plan & sections etc. The basis of bulk density and recovery factor should be given on the field tests conducted for minerals. Cut-off grade based on market conditions, mining losses may also be considered for estimation of reserves & resources.
19. Basis of 70% recovery from reserves is not given. Recovery percentage may be estimated from the mined out ROM material brought at surface level instead of unknown material lying at bottom of the river.
20. Geological reserves & Resources have to be shown in table to compare as per previous approved plan and as of now. Addition or depletion of reserves/ resources to be explained.
21. Reserves & Resources table, dated should be updated based on recent surveyed plans.

#### **Mining:**

22. Present pit dimension with length, breadth, RL, depth, benches in Ore & waste has to be shown in table format for all the existing pits & dump area.
23. The recovery of Limeshell is 70% and remaining 30% of waste has been not discussed.
24. The mine design parameter should be discussed in brief with all precautionary measures. Instead of referring plan & section plates, is should be discussed in brief in tabular form.
25. The adequacy of mine machinery & their capacity should be discussed as per manual of appraisal of mining plan 2014. The mine machinery should be optimised based upon the haul road, height & width of bench in mine as per MMR, 1961. It should be clarified whether mining machinery/ crusher/ manpower used is own/ purchased/ hired/ contract etc.
26. Feasibility report for the UNFC reserves and resources estimation is not prepared.
27. Simultaneous backfilling proposal is also mentioned in the text but year-wise backfilling proposal has not been discussed.

#### **Use of Mineral & Mineral Rejects:-**

28. There is a reject generation during mining of Limeshell, if mined out material is having more quantity of Sand/ Clay. Possibility of segregation of Sand/ Clay from Limeshell should be explored.
29. Requirements of end use industry have to give along the physical & chemical compositions.

30. IBM registration number of buyer has to be mentioned.

**Others:**

31. It should be discussed the employment potential as required under MMR, 1961. It should be time bound commitment for appointment of Mining Engineer as required under provision of MCDR, 2017.

32. It is reported for employing only expert swimmers/ fishermen for mining of Limeshell; however they are taken under un-skilled category for river bed mining.

**PMCP:**

33. Land use pattern should be mentioned as on date or 01.04.2018 and subsequent next plan period up to 31.03.2021 and lease period. The existing as well as proposed environmental protective measures should also be given in tabular form.

34. Existing land use pattern, location of different monitoring stations as per IBM/ MoEF guidelines for EMP and frequency of monitoring may be discussed. Proposal for construction of suitable dimension of embankment/ parapet walls, fencing near road should be discuss.

35. Financial Assurance: - the copy of original valid bank guarantee for B category mine should be submitted in final submission in the form of Annexure as per MCDR 2017. Minimum Bank guarantee for B Category mine is Rs.5 Lakhs.

36. Review of PMCP proposals for proposed plan period may be included by yearly report on PMCP table.

37. Summary of year wise proposals of plantation, construction of retaining walls, garland drains etc should be given year wise at item 8.3 with quantities and dimensions.

**Plates:**

1. DGPS Plan: the copy of DGPS plan duly authenticated by state government is not submitted.

2. Surface Plan: Small jetty stack yard has been shown outside the lease boundary. The stock yard has been included in closing stock.

3. Geological Plan: It is incorrect, as explained in Geology chapter for depth of river at different points. Sections are not matching with vertical scale for Limeshell thickness, water level etc. 111 category has not shown in sections. Section has to be drawn for every 100m interval.

4. Production Plan: The yearwise working section is not enclosed.

5. Environment plan: The plate is not prepared as per rule 32(5)(b) of MCDR 2017, show other details population, village boundary, types of land etc. Features like water bodies, building, farm houses; electric pole has to be included in 60m & 500m area surrounding lease boundary.

6. Reclamation plan: - Dimension of proposed Fencing and Afforestation should be mentioned on reclamation plan. The year wise plantation proposals should be shown by different colors. Existing & proposed afforestation is not shown properly in plan.

7. Financial Assurance plan: - The area considered for financial assurance should be shown by different colors and indexed. Table showing area considered for financial assurance under different activities should be given.

**Annexure:-**

1. All the Kannada Annexure should be translated in English for further references.

2. The latest translated copy of Annexure-2A (Village land account) in English should be enclosed.
3. The copy of original valid BG of extended period should be submitted in the form of annexure.