

**Scrutiny comments in respect of Modifeid Mining Plan with progressive Mine closure Plan of Sinla Limestone Mine of M/s Nirma Limited (Sidhee Vinayak Pvt Ltd.) over an area 49.71 Hectares in District Pali, Rajasthan State submitted under rule 17(3) of MCR 2016.**

1. Existing lease period should be mentioned on the cover page as well as in the text as till date State Govt has not issued the lease period extension order as per MMDR Amendment Act 2015.
2. Authentic lease plan with all the Khasra details of the villages duly verified by department of Mines and Geology of State Govt showing the location of the lease area with DGPS coordinates of boundary pillars should be enclosed. Authentic lease plan shall be the basis for the preparation of all the plans and sections. On Khasra map of the applied area lease boundary should be marked in **different color code** and duly authenticated by State official.
3. In Consent letter/Undertaking/Certificate from the applicant as well as on page no. 4; the submission rule shall be 17(3) of MCR 2016 instead of rule 17 of MCR 2016
4. During the filed visit it was observed that bottom most bench has not been shown on the plates. After precise resurvey of whole area mark the correct position of working benches, pits, dumps etc. on the various plates.
5. Under location and accessibility chapter on page no. 12 longitude coordinate of pillar N is not matching with State Govt. coordinate sheet.
6. Para 3.3(Review of earlier approval proposal)
  - I Exploration – the year of sinking bore hole with date of completion of exploration work is not mentioned.
  - II Para 3. The status of violation letter/show cause notices issued by this office with Status of compliance of violation may be given in tabular form in chronological order for the reviewed plan period.
  - III Under review chapter on page no.14 the quantity of waste generated is not matching with quantity of waste generated shown on page no. 43.
  - IV Under review chapter on page no.14 the figure of area put under different heads at the end of year 2016-17 is not matching with figure given in financial assurance table given on page no. 74.
7. **Part-A-Geology and exploration chapter**
  - I The whole reserves/resources have been estimated and shown under G1 category, but it is not acceptable as it is not as per MEMC Rule 2015. For G1 category the depth extension should be taken upto exposed limestone in pits or up-to the level proved by Bore holes. Lateral extension may also be taken as per the MEMC Rule 2015. The detail of calculation of reserve and resources has also not been given.
  - II For UNFC table the justification of parameter considers for the estimation of category wise reserve and resources under UNFC has to be explained in detailed like strike length, width and depth of ore body is considered for different category. The resources blocked under statutory boundary and under benches beyond UPL should also be shown separately in UNFC table. The various UNFC codifications may also be given in geological sections and on surface geological plan. In various tables the

total and calculation mistake is also observed may take care. The reserves and resources may reconcile.

- III On page no. 16 it is mentioned that surface plan prepared on 1:2000 scale; while enclosed surface plan (Plate No. 3) prepared on the scale of 1:1000.
  - IV The detail analysis & result of bore holes mentioned on page no. 21 should be enclosed
  - V Under geology and exploration chapter on page no. 30 in table A1.12 the total of reserve & resources to be rechecked.
  - VI The future exploration programme has not been discussed. The exploration programme is to be given in order to convert resources into reserves horizontally as well as depth wise as discussion in field in the light of MEMC Rule 2015 and Rule 12(4) of MCDR 2017. Hence a remark column in table showing the purpose of exploration is to be given.
8. Latest mineral analysis report from NABL laboratory should be enclosed.
  9. In the enclosed annexure XVIII the lease area should be marked by red colour.
  10. All mining proposal should be supported with Grid references.
  11. Broad blasting parameters (Blasting pattern, charge per hole, charge per delay, maximum holes to be blasted per delay and manner and sequence of blasting ) have not been given in details. Powder factor in ore and overburden have not been given. **Details about storage of explosive have not been furnished.**
  12. Chapter 4.0 Stacking of Mineral Reject/Waste- The existing quantity of waste and occupied dump size is not mentioned. The additional requirement of area in hectare as given in the table did not match with the quantity generated. This may be reconcile and should be supported with Grid references. The proposal for retaining wall, garland drains and siltation ponds have been given, but proposed year is not given.
  13. Name of persons, designation with address and phone along with respective responsibilities should be detailed under disaster management para.
  14. Para 8.6 of PMCP. The financial assurance is not found enclosed. As per provision of Rule 27(1) of MCDR 2017, the Financial assurance co-terminus with mining plan period in favour of Regional Controller of Mines, IBM, Ajmer should be submitted in Original with a copy annexed in the documents.
  15. **Plates**
    - i Authentic lease plan with all the Khasra details of the villages duly verified by department of Mines and Geology of State Govt showing the location of the lease area with DGPS coordinates of boundary pillars should be enclosed. Authentic lease plan shall be the basis for the preparation of all the plans and sections. Mark correct positions of boundary pillar coordinates, haul roads, existing pits & contours on all the relevant plates.
    - ii Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans.

- iii **Surface plan-** Coordinate of all the boundary pillars is not given. it was also observed that bottom most bench has not been shown on the plates. After precise resurvey of whole area mark the correct position of working benches, pits, dumps etc.
  - iv **Geological Plan-** Assay value for all the bore hole should be given. Plan may be revised as suggested above and in field for revised calculation of reserves and resources.
  - v **Plate no. 5-** benches and ramps etc is not shown properly, may be revised as discussed in the field.
  - vi **Financial Area Assurance Plan-** the financial assurance table given under par 8.6 for calculation of Financial assurance should also be given on plan and incorporating all the features as per financial assurance table and correlate them with actual ground condition.
16. Few representative photographs showing the land use pattern of the lease area, environmental status of the area should be enclosed.
  17. All the annexure & text should be attested by qualified person for their authenticity.
  18. In soft copy covering the entire document and plans should be enclosed at the time of final submission.

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