

**SCRUTINY COMMENTS ON THE MODIFICATION OF REVIEW & UP DATION OF MINING OF HADDINAPADA IRON ORE MINE OF SHRI B. RUDRA GOUDA, LEGAL HEIR OF LATE B. KUMAR GOUDA, M.L. NO. 2516, OVER AN AREA OF 79.806 HA AS PER CEC, IN HULIKUNTE SM BLOCK VILLAGE, SANDUR TALUK, BELLARY DISTRICT, KARNATAKA STATE. SUBMITTED FOR APPROVAL UNDER RULE 17(3) OF MCR, 2016. MODIFICATION PERIOD FROM 2018-19 TO 2020-2021. CATEGORY OF THE MINE IS A(FM-FULLY MECHANIZED), OPEN CAST MINE. NON-CAPTIVE, SM BLOCK, SANDUR RESERVE FOREST. DATE OF EXPIRY OF THE MINING LEASE IS 13.03.2056.**

**TEXT:**

**COVER PAGE:**

1. On the cover page, the forest area/ land present within the ML area should be specifically mentioned, if any reserve forests present.

2. Annexures, whatever the annexures enclosed are required to indicate with the date of each letter and other reference numbers for reference.

3. **Introduction:**The changes that are expected in this period of modification need to be specific and accordingly, the respective para of the text and the corresponding plates may be attended and incorporated in the document. Whether any change in the reserves/ resources on +35%Fe threshold value, production remains the same, any change in the development.

4. Para 3.3, under reclamation work, in the table without number, wherein it is given, the works completed up to June, 2018 as under progress, which must be given with tentative time of completion for reference.

5. Para 3.5, The mine closure happened due to the Hon'ble Supreme Court order only, later no such closure happened need to be mentioned.

**PART-A**

6. Para 1(e), under exploration, the number of bore holes drilled during the year 2016-17, 2017-18 & the current year, as on date of submission, the minimum & the maximum depth of drilled bore holes may be indicated for reference, instead of just giving the total depth of bore holes. In the light of the above remarks, the text & the plates may be attended, wherever applicable.

7. Para 1(i), the future proposed bore holes, reveals five numbers in each year to the depth of 230m, which comes to 46m average, which is not appropriate, the depth may be increased suitably to above 75m to 100m respectively to study the depth of the ore body. In the light of the above remarks, the text and the plates may be suitably attended, wherever applicable.

8. Para 1.0 (j): the addition and depletion of reserves & resources after the last approved document may be given with clarity and in particular giving the +45%Fe & +35%Fe and BHQ/ BHJ separately. Give reserves and resources also separately with clarity.

9. The report submitted for feasibility may be reassessed, considering the +35%Fe, threshold value as per the new circular.

10. Para 1(L), the reserves/ resources submitted as on 1/7/2018 may be re-assessed to 1/8/2018 considering the above remarks on +35%Fe threshold value. But, it is given reserves are calculated for +45%Fe as threshold value.
11. Para 2A(a), under the existing method of working/ pits, the number of stacks of fines, calibrated ore and the ROM stacks present also may be indicated in the surface plan for reference.
12. Para 2(b), the present mining is referred to the threshold value of +45%Fe, for the production quantity of 1.26MMTA, whereas the latest threshold value is for +35%Fe, for which no comments have been offered/ nor discussed on the same may be explained.
13. Para 2(b)(II), under the dump re-handling, instead of indicating the available materials, no proposals has been given, it should be appropriate to indicate, the quantity available for future recovery.
14. Para 2(d), it is proposed that the width of the bench will be maintained more than the height of the bench, which is not correct proposals, it should be specified, like in other paragraphs, either 10m or 15m. (ii). The powder factor indicated as 7t/kg of explosives, it should be re-checked, the strata, exhibits the fines of 70% & lump ore 30%, if it is so, the PF should be likely to increase, will not be same in other hard lumpy ore mine.
15. Para 2(f), the life of the mine given is for 34 years at the rate of 1.26MMTA of +45%Fe, and the reserves of 42.36MMT, but if it is going to be with +35%Fe threshold value, than the reserves/ resources will change, likely the life of the mine may be change accordingly.
16. Para 4(a), the mineral rejects is not indicated, since all the materials of +45% Fe, here it is required to talk about the materials of +35%Fe and its usage. (ii). The temporary back filling, proposed for the year 2019-20 & 2020-21, need to be ensured for appropriate exhaustion of minerals at the bottom of the pit, before commencement of backfilling/ reclamation of work in the ear marked location.
17. Para 5, nothing mentioned about the usages of +35%Fe grade ores along with the +45%Fe and above grades, which ought to have been.the usage of +35%Fematerials requirements/ usage of the same are not discussed.
18. The information furnished in the table No. 8.3, need to be re-checked & attended appropriately on the back filling/ reclamation issues as per the proposals drawn in the text from the period 2019-20 onwards, accordingly, this table need to be attended and furnish the information.
19. Latest photographs of the mine workings, like bench workings, ROM stacking, fines & calibrated ores stack wise, waste dumps, other infrastructures may be brought out, including the latest R & R works carried out as per the RR document approved.
20. The latest core bore holes drilled in the ML area need to be presented through photographs along with the location, other details, where it has been drilled & cemented.
- PART-B**
21. The consent letter enclosed in the document need to be corrected to RCOM, IBM, Bangalore, instead of Goa. The qualified persons and not recognized persons. In the light of the above remarks, the text and the plates may be attended, wherever applicable, along with date of submission.

22. Key Plan (Plate No. 2): The approach road to the ML area with distance indicated on the plate, but not shown the location & the route with clarity.
23. Surface Plan (Plate No. 3): Surface plan, should be prepared as per rule 32(a) of MCDR, 2017. (ii)The fines stacks and the calibrated ore stacks should be segregated and placed systematically in order for easy e-auctioning (iii). The DTH drilled bore holes also should be shown in red color with numbers may be given for easy identification from the core drill holes.
24. Geological Plan (Plate No. 5): The exploration proposed for the future mining may be attended appropriately based on the remarks given in the text. (ii). The DTH holes existing also should be shown in red color only, by giving numbers for the same from the core bore holes. (iii). The UPL, the ultimate pit limit drawn for the present submission is temporary one, which needs to be re-modified based on the changes occurs due to future mining & also through exploration. (iv). The inactive dumps exist needs to be removed in due course of time from the existing location, based on the geology/ mineralization present in that location.
25. Geological Plan (Plate No. 6B): the proposed bore holes for the current year and the future may be shown in the sectional view appropriately to know the locations.
26. Slice Plan (Plate no. 07): The slice plan should be prepared based on the bench wise to the scale, and not without scale is accepted.
27. Development & Production Plan & Section (2018-19 to 2020-21, Plate No.8A, ): The projected workings should be oriented along east to west direction, and the face should be opened on either end, instead of creating pit separately. (ii). There should not be selective mining, keeping/ blocking the BHJ/ BHQ patch/ non-ore bearing starta in between the working faces. (iii). Though the back filling proposals drawn for the next year as indicated in the plate, which also temporary location, the development and the production should be continued laterally and the depth wise, to expose the ore body and to recover to the optimum level, without any barriers. (iv). If the location proved to be barren from the development of working benches, than the proposals of back filling may be resumed, otherwise, development and production may be continued, till you obtain the ore body/ waste rock. In this context, the scrutiny remarks given in Mining chapter may be followed &attended suitably. (v). In the light of the above remarks, the other proposals for the year 2019-20 & 2020-21 may be followed to exploit the minerals to the satisfaction, without leaving the pillars/ barriers.
28. Conceptual Plan& Section (Plate No.13): The plan and the sections should be prepared in such a way to present the position of workings at the time of conceptual stage/ expiry of lease period, which must be brought out suitably. (ii). The plan and the sections should be attended in the light of the remarks furnished in the text part also, while preparing these plates suitably.
29. Following Annexures should be enclosed in the document:
- a) Latest season environmental monitoring data.
  - b) Copy of chemical analysis report for BHQ and waste from NABL or similar accredited Lab.
  - c) Core library established in the mine need to be placed in photographs.
  - d) The copy of the latest financial assurance/ bank guarantees amount need to be attached as per the remarks given.