

SCRUPINITY COMMENTS IN RESPECT OF SECOND MODIFICATION TO THE APPROVED REVIEW AND UPDATATION OF MINING PLAN OF KALLAHALLI IRON ORE MINE (ML NO. 2538) OF SHRI H.N.PREMKUMAR, OVER AN AREA OF 19.29 HA.(AS PER CEC SKETCH), SITUATED NEAR KALLAHALLI VILLAGE, NEB RANGE, HOSPET TALUK, BALLARI DISTRICT OF KARNATAKA STATE

COVER PAGE

1. Name of the document may be corrected as 'Second modification to the Approved Review and Updation of Mining Plan'. Mod. RMP period should be mentioned as from 2018-19 to 2021-22.

DETAILS OF APPROVED REVIEW AND UPDATATION OF MINING PLAN

2. Para 3.3: In review of exploration, excavation, reclamation etc. all review positions may be furnished for F.Y. 2017-18 and 2018-19 (upto 31.08.2018). Proposed and actual stripping ratio during F.Y. 2017-18 and 2018-19 may be furnished in table-7. Achievement of approved Reclamation and Rehabilitation measures as on date should be furnished in this para.
3. Achieved exploration details as mentioned in page no. 13 and 14 may be removed from this chapter, the same information should be incorporated within Part-A, para 1.0 (e).
4. Para 3.4: Copy of the violation letters received during this Review and Updation of Mining Plan period and subsequent compliance thereof should be mentioned in detail. Copy of the compliance letters may be enclosed with the document.

PART-A

5. Para 1.0 (j): It is to be clarified in this para whether resources of iron ore has been estimated in accordance with the revised threshold value notification of iron ore dated 25.04.2018. Resources of siliceous iron ore /BHQ having Fe value within 35 to 45% is not separately estimated, please clarify.
6. Para 1.0 (k): Following deficiencies have been observed in this para:
 - a) Detailed section wise reserve/ resource calculation should be furnished as per demarcated UNFC codes given in the geological sections, not as per the stages of exploration.
 - b) In geological sections, demarcation of UNFC Cat. 121 are found incorrect; the same should be corrected as UNFC Cat.122. Hence, mentioned 'G1 stage of exploration' in table nos. 23, 24, 25 and other all relevant places of the document this should be corrected.
 - c) In section no. A-A', UNFC category of the main reef iron ore should be corrected as 222. Accordingly, estimation of blocked resources in this section may be corrected.
 - d) Depletion of reserve by concurrent mine production has not applied while re-estimation of reserve as on 01.08.2018.
 - e) Recovery of float iron ore is considered as 60%, but copy of the analysis report has not enclosed in the document.
7. Para 1.0 (l): This para has not furnished in the document as per the standard guidelines of preparation.
8. Para 2.0 (a): Dimension of all pits present in the ML area should be furnished here in a tabular format. Mining pit no. 2 is not shown in the surface plan.
9. Para 2.0 (b)(i): It is to be mentioned in table no. 29 and other relevant places that for F.Y. 2018-19, production is proposed from 01.09.2018 to 31.03.2019. Proposed stripping ratio mentioned

KChally
1 | Page

- in the same table is found incorrect. Proposed top soil generation with float iron ore has not been estimated separately in production and development calculation during 2018-19 (ref. page 53).
10. Para 2.0 (b) (ii): In dump re-handling proposal, location of existing sub grade stack is not demarcated in the Surface Plan. Year wise proposal for sub-grade dump handling should be furnished in table 33.
 11. Para 4.0 (a): Dimension of existing dump may be furnished in this para with year wise proposal for disposal of low grade iron ore (Fe value 35% to 45%).
 12. Para 4.0 (c): Preventive measures to avoid contamination of waste with existing sub-grade material should be adopted and elaborated here. Proposed dimension of retaining wall and garland drain within the ML area and outside ML area to be furnished in table no. 41.
 13. Para 5.0 (b): Proposed utilization and stacking proposal of siliceous iron ore (Fe 35% to 45%) is not discussed.
 14. Para 5.0 (e): During site inspection it was submitted to understand by the representatives of the lessee that lumps obtained from the low grade siliceous iron ore was being blended with high grade iron ore to meet the requirement of buyers, but the same is not discussed in the document.
 15. Para 8.1: (i) Proposed sampling stations of air water, noise and soil (core& buffer Zone) may be given in this paragraphs in a tabular form.(ii)Year wise plantation details with area, no of saplings, species proposed and expected survival rate may be given in a tabular form.
 16. Para 8.2: The sources of air, water and noise pollution (considering all the possible sources of pollution in mining activities), existing mitigation method and proposed mitigation methods may be enumerated in a tabular form.
Year wise such proposals considering the approved R & R plan may be given in a separate table.
 17. Para 8.3.5: In 'summary of year wise proposal for item no. 8.3' individual proposals from F.Y. 2018-19 to 2021-22 are not given (ref. table-57).
 18. Para 8.6: No additional stacking areas for 'mineral reject' and for 'mineral storage' (ROM) have been identified in the Financial Assurance table, please clarify. In previous approved Modification to the Review and Updation of Mining Plan (approved dated 25.10.2017) 'additional area requirement' for mining was furnished as 0.4 Ha., but in the present modification, despite proposed enhancement of production, additional area requirement at the end of F.Y. 2021-22 is mentioned as only 0.2 Ha.
Also, 'undisturbed area' has found to be reduced from 5.14 Ha. to 4.84 Ha. in the present submission, please clarify.
Systematic stacking location (or temporary stack) of ROM or finished product is not discussed anywhere in the document.
Valid Bank Guarantee against Financial Assurance should be enclosed with the document.

PART-B

19. Para 10, PLATES:

- a) Surface Plan (Plate No. 03): Extent of working pits, mineral stacks and sub-grade stacks should be shown in this plate with clear identification nos. in harmony with the text description. Demarcated colour hatching of existing surface features are not tallying with the

index, may be corrected accordingly. Front of the RL of mining benches and mineral stack ID nos. are not legible in the plan.

- b) Geological Sections (Plate no. 05): Demarcation of UNFC Cat. 121 should be corrected as UNFC Cat. 122 from section nos. C-C' to G-G'. In section no. A-A', UNFC Cat. of main reef iron ore should be corrected as 222. Drilled DTH holes, trial pits and proposed boreholes are not marked in the sections.
- c) Production and Development Plans (Plate nos. 6A to 6D): Bench straightening work for top two benches in pit no.1 required to be undertaken during F.Y. 2018-19, necessary correction and re-estimation of OB should be made. Proposed road from working pits to active waste dump should be demarcated in all plates. Year-wise proposed afforestation and other environment protective measures also to be demarcated. Year wise proposals for mineral & mineral reject stacking to be shown in the respective year's proposal plate.
- d) Financial area Assurance Plan: This plan has not been provided with the document. Outlines of the proposed mine workings, dumps, stacks, etc. covering all the items under the financial assurance table and at the end of F.Y.2021-22 may be shown in this plate.

20. **Para 11, Annexure:** Following items are required to be annexed with the document:

- a) Corrected section wise reserve and resource estimation of the deposit as per the UNFC codes.
- b) Copy of chemical analysis reports of waste and mineral rejects from NABL or similar accredited laboratory.
- c) Copy of the recovery analysis report of Float Iron ore.
- d) Copy of the violation letters from the IBM and subsequent compliance from lessee.
- e) Few photographs of the mine pits, waste dump, boundary pillars, R&R activities etc.
- f) Copy of specific orders / guidelines or notifications received from Govt. regulatory bodies pertaining to this ML.
- g) Copy of the valid Bank Guarantee, valid up to 31.03.2022.

K. Chaitanya
28.08.18