

Scrutiny comments in respect of Bhogat Limestone mine, M.L./SyNo.-100P over an area of 4.90Ha, non-forest, A-others category, situated in Bhogat-village, Kalyanpur-Taluka, & Devbhumi Dwarka-Distt. of Gujarat-State for approval of Review of Mining Plan under Rule 17(2) of MCR,2016 for the block period of 2014-15 to 2018-19 & actual period of approval 2017-18 to 2018-19 (Lease period expired on 04.2.2059 of Shri Nilesh P Pandya.

**Cover page-** (1) The title of document should be corrected as “Review of mining plan” instead of mining plan. (2) The block period of approval 2014-15 to 2018-19 & actual period of approval 2017-18 to 2018-19 should be given. (3) The name of lessee should be corrected as shri Nilesh P Pandya. It needs correction. (4) The expiry of lease period should be 29/11/2027 as per MMDR amendment Act 2015.

**General-(i)** It was observed during inspection that no latitude & longitude of BP were available/erected as per statutes in field. (ii) The mine workings done within 7.5m of statutory barrier in North side of lease should be discussed & justified with supporting documents. (iii) The copy of common boundary working permission under rule 111 of MMR 1961 if any, should be enclosed. (iv) The GPS coordinates of lease boundary pillars is no more allowed. It should be DGPS coordinates as per CCOM circulars 02/2010/MCR, 2016 duly authenticated by State CGM, Gujarat.

**Introduction-** Page-1,(i) The brief history of mine should be discussed from first grant of mining lease, and approval of MP/SOM/Modification with period of approval etc. (ii)The copy of Environment Clearance /Consent to Air & Water etc should be discussed & submitted in the form of annexure.

**Location & Accessibility:-** Page-2,(i) expiry of lease period i.e.04/2/2059 as per MMDR amendment Act, 2015 should be given. (ii) The email id, fax & contact number of lessee should be given. (iii) The ownership details of lease area based on Govt. revenue record should be given in tabular form.

**Details of approved mining plan/scheme of mining-**(1) It should be discussed & justified in review chapter that year wise total ROM production of about 85,766T done but there was no valid approved scheme of mining for the period 2014-15 to 2016-17 & more so, year wise % of excess ROM production from 2009-10 to 2013-14, is not given in tabular form. (2) The review chapter should also be discussed about year wise production, OB/Development, exploration, plantation done etc. with location, top & bottom RL, area/tonnage & grade etc. (3) The existing exploratory trial pits, location & depth has not been given. (4)The feasibility report should be discussed with latest economic parameters, IRR, viability/true profit per tonne of project etc. in conclusion. (5) ROM production quantity should be updated as per IBM monthly & annual returns submitted to this office.

**Geology-**Page-10, (1) The estimation of reserves (111) of 0.459million tonne & resources (121&122) 0.173 million tonne without further exploration in depth wise is imaginary & incorrect & not acceptable as per provision of MEMC rule 2015 (2) The Adequate number of exploratory hole/pits in mineralized area of W50 to E50 is to be made, more so a proposal should also be given for ascertaining the mineral continuing below existing depth as per GSI/State data. (3) None of the pit/hole has attained average 8m/10m depth, even though it is shown in plan & sections & text (Page-8,12,15). Re-estimate the reserves & resources & proper marked the below existing depth in G3 level & proposal in 7.5m without permission under MMR1961 is not acceptable. (4) It was observed during inspection that survey of lease area was not updated & only single pit was observed during inspection. It needs modification by re-survey & submits. (5) The reserves and resources should be given & updated as on 01.4.2017 after depletion of production achieved up to 01/4/2017 & reserves & resources should be modified by leaving the mineral blocked in statutory barriers etc. (6) The cut-off grade & threshold value of limestone mineral should be discussed as per IBM circular 2009. {Limestone-Cao-34 %( min), Mgo-4 %( max.)}. (7) The above threshold & below cutoff grade should be consider as mineral rejects. (8) Analysis report of limestone/intercalated waste/mineral rejects etc. should be submitted from an NABL accredited Laboratory only duly signed by authorized person with date & place.

**Mining:-**Page-15-16, (i) The survey of lease area was not matching with plan & section & single pit of about 5-6m height observed without adequate exploration work; proposal of about 82000

Tonne/annum is not acceptable. The excess ROM production & without approved Mining scheme production achieved in past should be discussed & justified with valid reason. **(ii)** Why mining operation should not be suspended/prosecuted for achieved production without approved MP/MS & excess production under MCDR rule, 2017. **(iii)** All Geological reserves/ Block able reserves calculation & Year-wise production & development calculation tables should be modified up to true depth of mineral potential area. **(iv)** The correct existing pit dimension along with no of benches, top & bottom RL etc., in tabular form should be given as on 01.4.2017. **(v)** The year wise proposed production & development quantity has not been given in tonnes also. **(vi)** The above threshold value & below cut-off grade should be given as mineral rejects. **(vii)** It was observed during inspection that mining operation done unsystematically & so many ROM/mineral rejects stacks developed & formed in lease area & it seem to be more than production quantity as reported in returns. It needs to shown on plan & section & clarify with valid reason.

Page-20, The adequacy of man & machinery, calculation & their capacity should be discussed & justified. It should be clarified whether HEMM proposed/used is own/hired/contract etc. with supporting documents.

Page-21, The mining proposal in present plan period & conceptual period, life of mine etc is discussed properly. The land used details should be discussed as on 01.4.2017 & plan period up to 31.3.2019 & lease period/conceptual period.

Page-24,26 The quantity of mineral rejects generation as per buyers specification(+50%Cao) of - 50% to +34% should be discussed & given. The above threshold value & below cut off grade/Sale grade of ROM should be shown in mineral rejects column.

Page-29,30 PMCP: - Land use pattern should be mentioned as on date or 01.4.2017 and plan period up to 31.3.2019 and lease period. The existing as well as proposed environmental protective measures should also be given in tabular form with supporting latest analysis results.

Page-40, financial assurance: Land use pattern should be mentioned as on 01.4.2017 and plan period up to 31.3.2019. The copy of original valid bank guarantee of extended period for the A-category mine should be submitted in further submission in the form of Annexure (Min-10Lakh). All plan and section, text & tables should be modified based on above scrutiny.

During the pendency of approval, if there is any change in the name / address / ownership of mining lease, it should be informed promptly. All plan and section, text & tables should be modified based on above scrutiny.

All plan and section, text & tables should be modified based on above scrutiny & deficiencies should be rectified.

**Plan & sections:**

1. **Lease Plan:** It should be translated in English & DGPS coordinates of boundary pillar with numbers, latitude; longitude duly authenticated by CGM should be enclosed.
2. **Key Plan:** Lease area should be bounded by all sides showing latitudes and longitudes of extreme boundary points. Land use status i.e. Govt. land, private land & forest land, wind rose diagram etc must be shown by different colour code.
3. **DGPS plan:** It should be mentioned about the path row of the satellite and date of pass of DGPS survey. The soft copy of full set of auto generated files of super imposed output or text file etc. should be enclosed in further submission.
4. **Surface Plan:** The boundary pillar numbers with latitude, longitude as per state CGM, mineral stacks i.e.ROM, OB, Mineral rejects etc. should be shown properly. The statutory barrier of 7.5m, public road, etc. should be shown & leaving barrier as per provision of MCR,

2016. The surface plan should be signed & certified by mine surveyor/mine manager with date & place.

5. **Surface Geological Plan & sections:** The existing/proposed exploratory core boreholes, mine pits with G1,G2,G3 level of exploration as per MEMC Rule,2015 should be judicially shown. All sections should show contact with host rock at bottom or maximum possible mineral thickness based on GSI/DMG data.
6. **Production & Development plan& sections:** The survey of area & plan & section should be updated & modified year wise instead of composite plan. The year wise proposal should be shown properly with benches, top & bottom RL & area etc. The protective measures, approach roads to working pits etc. should be proposed & shown properly. The year wise proposal should be modified pit wise in G1&G2 level of exploration as per MEMC Rule,2015 only.
7. **Conceptual Plan:** The pit position of mine at conceptual stage of tentative mining should be shown in conceptual plan with showing plan & block period of mining with levels as given in existing & proposed land used details.
8. **Reclamation Plan-**Existing & proposed afforestation is not shown properly in plan. Garland drain, retaining wall, rain water management and mine water discharge system is not shown in this plan.
9. **Environment Plan:** The plate is not prepared as per rule 28(5)(b) of MCDR 88 to show other details population, village boundary, types of land& features in 60m & 500 area etc.
10. **Financial Assurance Area Plan-**The break-up of mine land area in plan should be given in table & text. Land use pattern should be mentioned as on 01.4.2017 and subsequent plan period up to 31.3.2019.

**Annexure:**

1. All supporting documents of latest copy of lease grant, mining plan & state DMG letter for deemed extension of mining lease as per MMDR Act,2015, DGPS coordinates of lease boundary pillars duly authenticated by CGM, State Govt as per CCOM circulars 02/2010 should be submitted in further submission. The other annexure/copy in Gujarati should be translated in either English or Hindi should be enclosed.
2. The copy of field photographs of trail pits/borehole logs etc. with with sign of geologist should be given in further submission.
3. The latest chemical analysis report of ore/mineral rejects etc. should be submitted from an NABL accredited Laboratory.
4. Field photographs of present mine workings, corner boundary pillars with number, RL, latitude and longitude marked on it etc. should be submitted.
5. Latest quarterly monitoring report on air, water & noise should be enclosed as per category of the mine for last 2-3 quarters.
6. The copy of original valid BG of extended period should be submitted in the form of annexure.