

Scrutiny comments in respect of Mota Ashota Bauxite mine, M.L./Sy.No.-238/P over an area of 30.3513Ha, non-forest land, A-others category mine, situated in Mota Asota, -village of Kalyanpur-Taluka, Devbhumi Dwarka-Distt. of Gujarat-State for approval of Review of Mining Plan under rule 17(1) of MCR,2016 for five year block period 2014-15 to 2018-19 & approval period 2017-18 to 2018-19 of Shri Naresh P Makchech.

**Cover Page-** The title of document should be corrected as "Review of mining plan" instead of mining plan. The expiry of lease period should be 29/01/2034 as per MMDR amendment Act 2015.

**General-(i)** The mining lease is effective from 1984. Details of mining Plan & SOM approved in past under MCDR,1988 are to be given. Considering the five year blocks, reasons for non-operation are to be given. The review of mining plan is required for approval of block period of 2014-15 to 2018-19 & approval period of 2017-18 to 2018-19. (2) It was observed during inspection that no latitude & longitude of BP were available/erected as per statutes in field.

(ii) 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-** (i) The brief history of mine should be discussed from first grant of mining lease & valid reason for non-submission of mining plan for approval even after lapsing of about 30years has not been discussed.

(2) It was discussed during inspection that aforesaid area was lies within forest & matter was sub-judice, therefore any reports in this regard etc is not given in the form of annexure.

(3) The opening notice was given in 1985 & 1543T closing stock was shown in returns submitted by lessee should be discussed & justified.

**Location & Accessibility:-** Page-2,(1) The date of expiry of lease period should be i.e.29/11/2027 as per MMDR amendment Act, 2015.

(2) The email id & address & contact number of lessee should be given.

(3) The type of land & ownership details of lease area should be given based on Govt. revenue record.

(4)The surface rights of land used for the plan period is presently held with lessee or not, is not discussed.

(5) All supporting documents in English/Hindi of forest/non-forest & CRZ clearance, State CGM for extension of lease area for 50years etc should be enclosed in further submission.

**Details of approved mining plan/scheme of mining-**(1) The review chapter should be discussed & justified about ROM production of 65T, 50T, 65T, 60T & 34T from 1992-93 to 1996-97 has been carried out without approved mining plan, Why you should not suspended/prosecuted for above offence? Justified it

(2) The existing old worked out pits (5Nos.) Page-8 & ROM production achieved in past is not matching, reconcile & justified.

(3)The copies of violations, SCN issued by IBM,/MMS Nagpur & their reply should be discussed.

(4)The feasibility report should be discussed with latest economic parameters, IRR, viability/true profit per tonne of project etc. in conclusion.

**Geology-(i)** Page-13, 22 **(1)** The estimation of reserves & resources without adequate exploration is incorrect (UNFC 111-1.83 million tonne) as per provision of MEMC rule 2015. Out of three old pits, two pits have been mineral exhausted as lithomarge clay arises.

(2) The reserves & resources should be re-estimated by considering the true depth of existing old mine pits of 2.8m to 5.3m average only as per MEMC rule 2015.

**(2)** The estimation of reserves & resources is not in grid of old existing pits of geological axis G1/G2/G3 respectively in plan & sections.

**(4)** The Adequate number of proposal of exploratory pits in mineralised area is to be made; more over a proposal should also be given for ascertaining the mineral continuing below lithomargic horizon.

**(vi)** The reserves and resources should be given & updated as on 01.4.2017 after depletion of production achieved up to 31/3/2017. The reserves & resources should be modified by leaving the mineral blocked in statutory barriers of CRZ/SEA Boundary corner etc.

**(vii)** Page-9, The cut-off grade & threshold value of bauxite mineral should be discussed as per IBM circular 2009. {Bauxite- $\text{Al}_2\text{O}_3$  - 30 % (Min) and silica (reactive) 5% (Max). The presence of silica content in bauxite more than 5% should be considered as waste. It needs correction.

**(viii)** Grade wise bauxite as per user's specification, below/above the grade or size, which is not saleable presently, should be segregated & proposal of stacks should also be shown on respective plan & section.

**(vi)** Analysis report of bauxite/intercalated waste/mineral rejects etc. should be submitted from an NABL accredited Laboratory only duly signed by authorized person with date & place.

**Mining:** - (1) The production of ROM proposal should be modified for the year 2017-18 & 2018-19 only.

(2) The reserves & resources of 1.83MT (UNFC-111) & (10% Plant Grade & 90% Non plant Grade) without adequate exploration data & analysis results, is not correct. It needs correction.

(3) The proposed annual ROM production of 3,42,045T is not acceptable. All Geological reserves/ block able reserves calculation & Year-wise production & development calculation tables should be modified & given.

(4) The existing pit dimension along with no of benches in ore & waste, top & bottom RL etc., in tabular form should be given as on 01.4.2017.

(5) The above threshold value & below cut-off grade should be given as mineral rejects.

(6) 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-22, 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-26,27,28 The quantity of mineral rejects generation as per buyers specification ( High & Low Grade) with proposed quantity should be discussed. The above threshold value & below cut off grade/Sale grade of ROM should be shown in mineral rejects column. The specifications of buyers of high & low grade is shown here is generalised, same should be specific to this mine/lease only.

Page-29, 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-43, financial assurance: Land use pattern should be mentioned as on 30.10.2017 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 as discussed during inspection.

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, pit no. with benches, mineral stacks etc. should be shown. The statutory barrier of 7.5m, public road, nallah/CRZ 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 survey of lease area should be updated, as last date of survey was 15/10/2016. The proposed exploratory pits should be judicially shown.
6. **Production & Development plan& sections:** The name of plan & section should be corrected & updated as per above scrutiny. The year wise proposal should be shown properly with benches, top & bottom RL & area etc. The year wise proposal should be modified pit wise in G1&G2 level of exploration as per MEMC Rule,2015 only. The protective measures, approach roads to working pits etc. should be proposed & shown properly.
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 & subsequent scheme of mining, modification approval letters, 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 resolution of board of directors for nominated owner/signing authority should be submitted 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.

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