

Report cum scrutiny comments on examination of Review of Mining plan with Progressive mine closure plan of Palakheda Bauxite mine of Sh. Indu Lal C. Vohra over an area of 4.8978 hect. (Sur no. 271) situated in village Palakheda, Taluka Porbandar, District Porbandar submitted under Rule 17(2) of MCR, 2016 and 23 of MCDR, 2017.

General

1. Information regarding the lease period extended up to fifty period as per MMDR Act, 2015 is not enclosed. In this regard letter received from State Govt. regarding mining lease is liable to be extended up to dt. 18.04.2022 as per provision made under Section 8A (5) of MMDR Amendment Act 2015 is to be enclosed.
2. The Cover Page do not have standard format. Phone no, Mobile no and e mail address of Mine owner & qualified person are not furnished. It needs to be corrected as modified in whole document.
3. Certificate/Undertakings from Owner and qualified person is not as per guide line. It should be updated.
4. **Authentic lease map duly certified by State Government indicating co-ordinates of the pillar have not been enclosed.**
5. Copy Environmental Clearance obtained from MOEF should be enclosed. Adequate water harvesting measures should be proposed towards protection of environment.
6. Further consent to operate mine obtained from State Pollution control Board should be enclosed.
7. In document old rule are given. It should be updated by new rule.

Chapter: Introduction: As per guide line Introduction is not furnished.

Chapter no.2- Location and Accessibility

8. KML file is not enclosed.
9. All Pillar coordinate are not furnished. Compliance of CCOM circular 2/2010 with regard to Geo-referenced mining lease map has not been done.

Chapter no. 3-Details of approved mining plan/scheme of mining

10. No benches are seen in field. Deviation are in Development, exploitation and environment monitoring during previous passed period. Give reason of it.
11. In para 3.5, information of Suspension mine is not correct. As per mine file record mine is suspended by IBM vide letter dt. 5.12.2011 for rule 13(1), 23E (2), 24 & 25 of MCDR 1988. Mine is revoked by IBM vide letter no. dt. 28.03.2012.

Part-A

Chapter no. 1.0 Geology & Exploration

12. Para no. (a)-Topography: Information of height & lowest point are not correct. As plan height & lowest point are 99 & 88.50mRL toward North east & south west of the area. Rectify it at relevant chapters.
13. Para no. (d)-Dimension of pit is not correct. It is given more than the lease area. How it possible. Rectify it at relevant pages.
14. Para no. (e)- As written two trial pit in area. But in given table only one pit Analysis report enclosed is too old.
15. Para (i) -Two trial pit are to be proposed in 2017-18 & 2018-19. What are the parameters to select these trial pit? Give justification.

16. Entire reserve estimation is incorrect. Grid & spacing given in part III of the schedule given in Mineral (Evidence of mineral content) Rules 2015 have not been followed. Methodology adopted for reserve estimation is not correct. Measured mineral reserve (331), indicated mineral reserve (322) have not been calculated. Reserve at pit floor is calculated separately not correct. How much thickness of Bauxite taken for at pit floor?
17. Entire reserve is placed under Non plant grade. Its meaning is not clear. It needs to be clarified elaborately.
18. Exploratory proposal is to be given as per rule 12(3) of MCDR 2017 with an objective of bringing entire area under G1 category.

Chapter no. 2-Mining

19. Mining chapter is not described correctly. On doing inspection no bench is seen in entire area. But in plan numbering of pit is not given. Planning of mining is not correct. Mining should be started from one direction & end in other direction. In lease area some area is left. Justify it.
20. Para (b) Table given is not as per guide lines. Value of Mineral reject in one column is not correct. Rectify it.
21. There is mineral reject but table for Dump handling is not furnished.
22. Yearwise description are not correct. In year 2017-18 mining started from south east area but given north east which is not correct. In the same way section line is not correct. These mistake are again occur in the year 2018-2019 to 2019-2020. Calculation of ROM & other is also not correct. So there is need to re check mining chapter completely.
23. Para no. (f), Conceptual mining: In proposed reclamation & rehabilitated how much area to be reclaimed & rehabilitated is not furnished. Give justification. In conceptual plan no section line is marked. So conceptual section plan is not matched with plan. Vital detail pertaining to life of the mine, ultimate pit size and post mining scenario and reclamation- rehabilitation aspect have not been discussed.

Chapter no. 3 Mine Drainage

24. 100m garland drain is proposed to be made. But what is the location not marked in any plan. Give it in proper plan & describe.

Chapter no. 4 Stacking of Mineral Reject

25. Proposal of Storage of soil/ mineral reject are not given. But nothing to be discussed where to dump store top soil/ mineral reject. What is the dimension of it? Nothing to be discussed it in mining chapter.
26. Analysis report of limestone is too old & not supported by the certificate NABL (National Accreditation Board of laboratories) laboratory. Analysis report of Bauxite should be of active working pit.

Chapter no.7-Other

27. During inspection Mining Engineer & Geologist at mine are not present. Give information about employment of both.

Chapter no.8-PMC

28. In existing land use pattern about 0.0100 hect. area used for plantation. Give type of species of tree & number of tree survived.
29. No proposal is given for rehabilitation of worked out benches, water management, plantation, fencing etc. Safety, security, disaster management plan is also incorrect.

- Monitoring report of air, noise & water pollution report are not furnished.
30. In para no. 8.2, Impact Assessment: In plan period about 5226 cum mineral reject is generated. What provision to make to stack this mineral reject. In given table area for Mineral reject & Soil stacking is not given.
 31. In PMCP, para no. 8.6- F A table is also not correct nor show the column wise correct total area. In financial table given proposal has not matched with FMCP plan. There is no information of virgin area.
 32. Financial assurance has not been computed in terms of rule 27(1) of MCDR 2017.

Plates

33. All the plans & sections have not been prepared on prescribed scale.
34. Cadastral plan duly authenticated by concerned Govt. indicating coordinately has not been given.
35. **Key Plan** is not submitted as required under rule 32(5)(a) of MCDR 2017 because some of important aspects are not incorporated like existing tree density, directions of road not shown, 5km radius is not marked, various monitoring stations have not been marked, etc.
36. **Surface Plan:** Surface plan is not submitted with all the information/prominent features as required under Rule 32(5) (a) of MCDR, 2017. Mining Lease boundary not marked as per the standard conventions. Other permanent features like temple, buildings, hutments, etc. exist in the ML area may also be marked.
37. **Surface Geological Plan:** is not submitted as per the relevant details as required under rule 32(1) (b) of MCDR 2017 because depth persistence & horizontal for different category of reserves not marked, strike & dip of the formation not shown, lithological contacts not marked distinctly, other adjoining ML area marked on sections but not shown on plan. Proposed bore hole numbering is not correct. This is Geological plan. So did not show feature of Surface plan? In the same way did not show geological feature in Surface plan.
38. Geological section plan: All UNFC code is not given.
39. **Year wise Plan:** Plan is not prepared as per guide line. Area marked under the year wise excavation appears to be incorrect & need to be reviewed, Ultimate pit limit not marked, advancement of excavation, approach to the faces are not marked, proposed protective works have not been marked correctly. Lithology of central part of area which is left for mining is not correct/ or differ from other plan.
40. **Environment Plan:** The plan has not been prepared incorporating all details as per rule 32(5) (b) of MCDR'2017 because position(s) of the adjacent leases are not shown on the Environment Management Plan.
41. **Reclamation plan:** Para 8.3: the details of progressive mine closure plan is not depicted distinctly on plan. The year wise completion status of proposed protective works should be incorporated in this plate.
42. **Conceptual Plan:** Pit configuration at the ultimate stage not marked, benching pattern not indicated in section, ultimate depth of working not marked, approach to faces at conceptual stage not marked.
43. **Financial Area Assurance Plan:** Area reclaimed and considered as fully reclaimed and rehabilitated if any may be shown clearly. Area marked under FA table must should be matched with the broken up areas as marked on plan. FA table should be available at FMCP plan for ready reference.
44. Copy of last Scheme of mining approval letter dt. 20.01.2013 is not furnished.
45. Some unit is wrongly given such as RL is written in place of mRL.
46. Numbering of annexure & plate is not in chronological order in text & index. Many annexures are not clear & nor readable.
47. List of plate and annexure should be enclosed after content.
48. Some of the mine photo such as pillar, working and old pit etc. should be enclosed.

49. There are certain omissions, deficiencies in the text and plates. Some of them are marked in the text & plates. QPs should ensure thorough editing before preparing the final copies.

Place:

Date:

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