



भारत सरकार GOVERNMENT OF INDIA  
खान मंत्रालय MINISTRY OF MINES  
भारतीय खान ब्यूरो INDIAN BUREAU OF MINES  
क्षेत्रीय खान नियंत्रक के कार्यालय  
OFFICE OF THE REGIONAL CONTROLLER OF MINES



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No FMCP/FM/45-ORI/BHU/2018-19

दिनांक / Date: 12.10.2018

To

Seraj Yusha,  
Joint Managing Partner,  
M/s Serajuddin & Co.,  
At/Post-Balda, P.S-Bamebari,  
Via-Joda, Dist-Keonjhar, Odisha.

Sub: Approval of Final Mine Closure Plan of Balda Block Iron Mines over an area of 335.594 ha in Keonjhar district of Odisha of M/s Serajuddin & Co. submitted under Rule-24 of Mineral Conservation and Development Rules, 2017.

Ref: - i) Your letter no. BBIM/217/2018-19 dated 01.10.2018 received on 05.10.2018.  
ii) This office letter of even no. dated 05.10.2018.  
iii) This office letter of even no. dated 05.10.2018 addressed to the Director of Mines, Govt. of Odisha, copy endorsed to you.

Sir,

This has reference to the letters cited above on the subject. The draft Final Mine Closure Plan has been examined in this office based on earlier site inspection carried out on 18.04.2018 by Shri Sudip Ranjan Mazumdar, Senior Mining Geologist. The deficiencies observed are enclosed herewith as Annexure-I.

You are advised to carry out the necessary modifications in the draft Final Mine Closure Plan in the light of the contents vide Annexure-I and submit **three (3) firm bound and two (2) soft copies of the document text in CD in a single MS Word file (the drawing/plates should be submitted in Auto CAD compatible format and JPG format in resolution of 100x100 pixels on same CD)** with financial assurance under Rule 27 of MCDR' 2017 within 15 (fifteen) days from the date of issue of this letter for further necessary action. If the total page of annexures exceeds 50 (Fifty) then it should be submitted as separate volume. But reference of these annexures must appear in the Final Mine Closure Plan document. The plates are also to be submitted in separate volume.

The para-wise clarifications and the manner in which the deficiencies are attended should invariably be given while forwarding the modified copies of the Final Mine Closure Plan. It may be noted that no extension of time in this regard will be entertained and the Final Mine Closure Plan will be considered for rejection if not submitted within above due date. It may also be noted that if the deficiencies are not attended completely, the submission would be liable for rejection without further correspondence.

भवदीय / yours faithfully,

12/10/18  
(HARKESH MEENA)

क्षेत्रीय खान नियंत्रक / Regional Controller of Mines

Copy for kind information and necessary action to:

1. Shri Nihar Ranjan Nayak & Shri B. K. Acharya, Qualified Person, M/s Serajuddin & Co., At/Post-Balda, P.S-Bamebari, Via-Joda, Dist-Keonjhar, Odisha.

(HARKESH MEENA)

क्षेत्रीय खान नियंत्रक / Regional Controller of Mines

**Scrutiny comments on examination of FMCP of Balda block Iron Mine over an area of 335.594 Ha in Keonjhar District of Odisha State of M/s SERAJUDDIN & CO**

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**PART A- INTRODUCTION**

1. In the cover page, the qualification of the qualified persons has not been mentioned. The format (text/table) and the sequence of paragraph are not same as per the format specified in IBM Manual for Appraisal of FMCP.
2. Page 3, Reference of latest modification to review of mining plan approved on 25.09.2018 has not been mentioned. Page 4, Requirement of FMCP as per the rules has not been properly mentioned.
3. Any proposal of decommissioning &, dismantling infrastructure, evacuation of ore stack/mineral reject stack, mining machineries etc. has to be completed by 31.03.2020. If proposed to retain beyond 31.03.2020, then proposal for their stability and security has to be proposed. Accordingly, proposals have to be modified at all relevant places in the document.

**PART B- GENERAL INFORMATION**

4. Para 1.1.4, Full address of partner/ Directors with full address & fax has not been mentioned.

**PART C: LOCATION AND ACCESSIBILITY OF MINE**

5. Para 1.2.2, Lease No/TC No. & Mine code/ Lease code has not been mentioned.
6. Para 1.2.7, Ownership and area acquired/surface rights/ consent obtained for different types of land have not been mentioned in the table.

**PART D: DETAILS OF LAST APPROVED MINING PLAN**

7. Para 1.4.1, the proposal and the compliance for exploration for 2017-18 is incorrect.
8. Para 1.4.2, the name of the pits put for production as per approval has not been mentioned.
9. Para 1.4.3, the location of excavation to be rechecked and corrected.
10. Para 1.4.5, quantity of overburden/waste (in m<sup>3</sup>) excavated, backfilled and dumped has not been furnished as per the format along with reason for deviation. Further, reason for higher overburden generation during 01.04.2017 to 02.12.2017 has not been mentioned. Also, the period of discontinuation of mining operation has not been mentioned for the period 03.12.2017 to 31.03.2018.
11. Para 1.4.6, the proposal for ROM is incorrect. Need to check year wise proposal and compliance for 2017-18. Further, the year wise proposal and compliance of "Graded Ore" has not been furnished. Under "reason for deviation", the period of discontinuance of mining operation has not been mentioned.
12. Para 1.4.7, year wise total quantity of mineral reject generated, utilized and stacked along with reason for deviation has not been furnished as per the format.
13. Para 1.4.8, the proposal and compliance of stripping should be rechecked and corrected for 2017-18. Reason for deviation has not been furnished.
14. Para 1.4.9, information submitted is incorrect. Need to rectify.
15. Para 1.4.13, in 2017-18, the period of discontinuance of mining operation has not been mentioned.
16. Para 1.4.17, the proposal and compliance for the year 2017-18 is incorrect. Need to specify the proposed and actual location of construction of retaining wall and garland drain. The period of temporary closure of mine has not been mentioned.
17. Para 1.4.20, Proposal and compliance of backfilling for 2017-18 is incorrect. Need to rectify the same.
18. Para 1.4.21, the survival rate has not been mentioned. The proposals need to be corrected.
19. Para 1.2.23, proposal and compliance for 2016-16, 2016-17 & 2017-18 has not been furnished.
20. Para 1.4.24 to Para 1.4.27: The proposed monitoring stations along with frequency of monitoring and its compliance have not been mentioned.
21. Para 1.4.28, information furnished in tabular format should be rechecked and corrected.
22. Para 1.4.29, the status of compliance of violation has not been updated.

**CHAPTER –II GEOLOGY AND EXPLORATION**

23. Page 36, Hematite as rock type mentioned is incorrect. The lithounits of the lease area have not been described properly.
24. Para 2.2.2, the explored depth in RL along with scale of exploration has not been mentioned.
25. Para 2.2.3, the detail of the sampling process that have been done in past should be mentioned instead of future proposals.

26. Para 2.2.5, the RL of the depth explored along with maximum depth explored as per the format specified in IBM appraisal of FMCP under different categories of UNFC has not been mentioned.
27. Para 2.2.6, the blocked resources figure furnished is incorrect. Need to do necessary corrections.
28. Para 2.4, provisions of Rule 63 of MCDR 2017 has not been mentioned.
29. The details of exploration to be carried out should be submitted as per following format.

Area (in Ha) Explored under G1 and G2 as per UNFC				Remaining area (in Ha) to be explored under G2 as per UNFC		Required number of boreholes for exploration of balance lease area under G1/ G2 level	
Forest		Non-Forest		Forest	Non-Forest	Forest	Non-Forest
G1	G2	G1	G2				

#### CHAPTER –III MINING

30. Para 3.1 and Para 3.3., year wise proposal submitted is not concurrence with approved modification of mining plan. Also, B.D= .....T/cum has not been furnished as per the format. Further, information furnished in page 51 and 52 is not required as per the IBM manual of FMCP.

#### CHAPTER –IV STACKING OF TOP SOIL, MINERAL REJECTS, FINES, TAILINGS/SLIMES AND THEIR DISPOSAL

31. Para 4.1, Locations (grid reference) of top soil, OB/waste, Mineral Rejects, fines, tailings/slimes have not been furnished as per the format specified in IBM appraisal of FMCP. Quantity of Mineral rejects dumps, fines and slime/tailings have not been furnished in tones and not concurrent with approved document. Sized ore quantity has been furnished under slime etc. Need to do necessary correction in the table.
32. Page 54, first paragraph may be omitted. Need to specify the same in time scheduling for closure with proper closure plan as no proposal evacuation of ore after 31.03.2020 will be accepted.
33. Para 4.2 and Para 4.3, the information submitted is not concurrence with approved modification of review of mining plan. Para 4.3 is not as per the format specified in IBM appraisal of FMCP. Para 4.3.1 is not as per the format and may be omitted.
34. Para 4.4, has not been furnished. Information under para 4.4 need to be furnished as per the format specified in IBM appraisal of FMCP.

#### CHAPTER –V FINAL MINE CLOSURE PLAN

35. Para 5.0 and 5.01 is not mentioned in the IBM appraisal of FMCP and thus may be omitted.
36. Para 5.1.1, information furnished is incorrect. Specific proposal of reclamation and rehabilitation of mined out land has to be submitted so that entire mined out land/matured area will be reclaimed and rehabilitated. Information should be submitted in following format. Sequence of backfilling should be same as per original sequence of the litho units occurring in the lease area. Accordingly, proposal should be submitted. Backfilling proposal to be submitted in following format.

Backfilling within the mined out part of Block F1					
Year	Quarry	Section No	Cross sectional area (in m <sup>2</sup> )	Length of Influence (in m)	Volume (m <sup>3</sup> )
2018-19					
2019-20					
<b>Grand Total</b>					

Proposal has not been submitted for securing the backfilled area by plantation. Necessary proposals to be submitted in the following format.

Year	Back-filled area available for planation (in ha)	Back filled area to be planted (in ha)	No. of saplings to be planted	Type of saplings
2018-19				
2019-20				
<b>Total</b>				

Sl.No	Status of reclamation and rehabilitation of mined out land	Area (in ha)
1	Total mined out land matured for backfilling by end of 31.03.2020	
2	Total mined out land (matured area) to be reclaimed and rehabilitated by 31.03.2020	

Proposal for reclamation and rehabilitation in the mined out area							
Name of the Quarry	Year	Mined out Land (in Ha)	Additional Area (in Ha)	Mined out Area at the End of the Year (in Ha)	Area to be Reclaimed (in Ha)	Remaining area for reclamation at the end of year (in Ha)	Method of reclamation and rehabilitation
	2018-19						
	2019-20						

37. Para 5.12, Proposal have not been submitted for fencing all the existing quarries. There is no proposal for fencing of mineral reject stacks, fines stack, mineralized dumps etc. if proposed to keep beyond 31.03.2020. Necessary proposals to be submitted and necessary corrections to be done for safety and security, securing the excavation area, pits, settling ponds, water harvesting areas, siltation ponds etc. through fencing.
38. Para 5.1.3, Existing afforestation details have not been furnished. Year wise specific proposal for planation on virgin area, backfilled area, dumps along with their location, area for planation, numbers of saplings along with name of species to be planted have not been furnished. Need to do necessary correction.
39. Para 5.1.5 & Para 5.1.6: Location of monitoring stations along with frequency of monitoring has not been furnished. Existing air quality status to be described. The mitigative measures to be taken for prevention of pollution of air from air borne dust particles have not been described. Water quality management to be described in similar lines.
40. Para 5.1.7, the type, quality and quantity of Waste/overburden dumps available and their disposal practice have not been described. The proposal of dumping should be concurrence with the dumping proposal in the approved modification to review of mining plan and the information should be furnished in tabulated format. There is no proposal mentioned for stabilizing the dumps with plantation along with protective measures taken for prevention of siltation, erosion and dust generation from waste material. If toxic and hazardous elements are present in the waste material, the protective measures to be taken for prevention of their dispersal in the air environment, leaching in the surface and ground water etc., should be described.
41. Para 5.1.11, detail information such as make, capacity etc. of the existing infrastructure have not been furnished in tabulated format. Any infrastructural facility which is an essential commodity/related to basic need or which absence may cause any degradation of environment or any damage to flora and fauna in and around the ML area or any danger to public safety or public infrastructure like rail, road etc. shall not be decommissioned (dismantling water supply, water treatment plant, power lines etc.) without prior intimation/approval of appropriate authority. Accordingly, proposal has not been submitted. Further, the existing infrastructural facilities available such as roads, aerial ropeways, conveyer belts etc. have not been mentioned and their future utilization have not been evaluated. If retained, the measures to be taken for their physical stability and maintenance should be described. If decommissioning proposed, dismantling and disposal of building structures, support facilities and other infrastructure, electrical equipments and infrastructures such as electric cables, transformers etc. should be described.
42. Page 94-95, decommissioning cost should be discussed in closure cost. Necessary corrections to be done. Time scheduling for decommissioning including decommissioning of fixed assets has to be completed by 31.03.2020. Accordingly, revised proposal for decommissioning by 31.03.2020 has to be submitted.
43. Para 5.1.12, disposal of mining machinery with reference to the extent of mechanization given in the "Mining" chapter of Approved Mining Plan have not been furnished. Refer page 97, the proposal for decommissioning of

fixed assets have to be modified and have to be completed by 31.03.2020. Accordingly, revised decommissioning proposal have to be submitted.

44. Para 5.1.13, Disaster management and risk assessment have not been done as per IBM FMCP guideline. Page 101, the proposal of fencing arrangement has to be completed by 31.03.2020. Hence, necessary corrections to be done.
45. Para 5.1.14, page 103- first paragraph should be omitted. In Sl. o 01, the figure furnished is incorrect. Scope of continuation of family occupation has not been described properly. Sl.No 4 has not been described properly.
46. Para 5.1.15, page 05, the proposal of decommissioning has to be modified and to be completed by 31.03.2020. Hence, revised decommissioning proposal have to be submitted. Proposal for fencing of quarries which are not planned for operation in 2018-19 and 2019-20 should be fenced by 2018-19. Specific proposal have to be submitted for evacuation of mineral reject stacks, mineral reject dumps, fines stacks, sized ore stacks before 31.03.2020 and if retained then proposal for securing and stabilizing the stacks/dumps along with protective measures have to be furnished. Proposal for stabilizing the backfilled area through plantation have not been furnished. Necessary corrections to be done in time scheduling for closure.
47. Para 5.1.16, Cost have not been estimated based on the activities required for implementing the protective and rehabilitation measures. Maintenance and protective works as envisaged during post closure period have not been mentioned along with annual cost estimates towards pumping duty, maintenance of dumps, watch & ward etc.
48. Post Closure Monitoring Schedule along with period as envisaged and Estimated Cost have not been furnished.
49. Para 5.2, table shown is not as per format specified in IBM appraisal of FMCP. Plantation has not been proposed for stabilization of waste dumps. Proposal for afforestation (plantation) over backfilled area have not been proposed. Cost including watch and care for plantation over dump and backfilled area has not been proposed. Area rehabilitated along with rehabilitation cost has not been furnished.

#### **ANNEXURES**

- a) Consent letter/undertaking/Certificate furnished is not as per the format specified in IBM FMCP.
- b) Annexures have been signed by Qualified Person (Pradeept Mohapatra) who has not prepared the document. Hence, the annexures should only be signed by qualified persons who have prepared the document. Necessary corrections to be done. Copy of grant order is not legible.
- c) Copy of FC clearance is not legible. Copies of financial assurance have not been enclosed.
- d) Copies of annexures are not legible. Copies of Form -I and Form J to be enclosed.
- e) Qualification and experience certificate of Qualified Persons as per Rule 15 of MCR 2016 to be enclosed.

#### **PLATES**

- A. True north or the magnetic meridian and the date of the later is not specified and not shown in plan and sections. 5 km buffer zone has not been marked on map.
- B. Geological plan and section and year wise development plan and sections are not in concurrence with the approved modification to review of mining plan.
- C. Environment plan: Many of the features as indicated under rule 32(5) (b) of MCDR, 2017 has not been shown on the plan. Contour values are not legible. Contours are not shown at places within 60m from lease boundary.
- D. Reclamation Plan: Proposal have not been submitted for stabilizing the waste dumps by plantation; Proposal have not been submitted for fencing existing water harvesting pond, excavation pits, settling ponds, siltation ponds, bore wells etc. Proposal have not been submitted for either evacuating the existing temporary stacks of fines, mineral rejects dumps, sized ore stacks etc. before 31.03.2020 or if retained they must be secured and stabilized. Accordingly the proposal has to be submitted. The term "proposed backfilled area" to be replaced with "proposed reclaimed and rehabilitated area". Garland drain and retaining wall have to be proposed all along the dumps, existing retaining wall and garland drain have not been shown; coir matting over fines dump has not been proposed, if proposed to be retained. If the temporary stacks of fines, mineral reject stacks/dumps will be evacuated before 31.03.2020 then these need not to be shown in reclamation plan. Necessary corrections done in the reclamation plan should also be incorporated at relevant places in the text.
- E. Conceptual plan and sections have not been enclosed.