SCRUNITY COMMENTS ON DRAFT REVIEW AND UPDATION OF MINING PLAN IN RESPECT OF DONIMALAI IRON ORE MINE OF M/S SHREE GAVISIDDESHWARA MINERALS, ML NO. 2552, EXTENT 130.0 HA. (AS PER JOINT SKETCH), SITUATED IN DONNIMALAI BLOCK, SANDUR TALUK, BALLARI DISTRICT OF KARNATAKA STATE

INTRODUCTION

- 1. Reference and proposal period of last approved Mining Plan and Scheme of Mining, status of other statutory clearances like FC/EC and its validity, specific orders / guidelines or notifications received from the regulatory bodies time to time pertaining to this ML may be discussed in this chapter briefly with supporting documentary evidences. Reason for non-working for last three years should also be discussed.
- 2. Status of proposal of surrendering the remaining 6.25 Ha. (As per the CEC sketch) to the Forest Dept. should be discussed in this chapter.

GENERAL

- 3. Para 1.0 (a): Name of the nominated owner should be corrected in table no.1; email ID and contact details of the lessee should be corrected in accordance with Monthly and Annual Returns.
- 4. Para 1.0 (f): Address of Qualified Persons should be corrected in accordance with the consent letter/ certificate issued by the nominated owner of the mine.

LOCATION AND ACCESSIBILITY

5. Copy of the high resolution satellite image, obtained from CARTOSAT-2 satellite LISS-IV sensor on the scale of cadastral map, as on 31st March of the financial year, covering the mining lease and an area of 2 kilometres from the lease boundary require to be enclosed with the document.

DETAILS OF APPROVED SCHEME OF MINING

- 6. Para 3.3: Reason for non-submission of the document (from 2017-18 to 2018-19) may be furnished in this para. Period of last exploration (trial pits and RC holes) to be mentioned in page no. 7.
- 7. Para 3.4: Reference of the violation letter issued by this office for non compliance of rules 27(1) and 27(2) of MCDR, 2017 dated 12.04.2018 is not mentioned in this para. Compliance position of the said violation letter should be mentioned here.
- 8. Status of R & R work completion in respect of approved R & R plan may be discussed at the end of this para. Copy of the monthly progress report on R & R (latest) submitted to the Monitoring Committee should be enclosed in the document.

PART-A

- 9. Para 1.0 (c): In geology of the lease area physical and chemical property the siliceous ore may be discussed with recovery% and quality of lumps and fines.
- 10. Para 1.0 (e): Details of the trial pits sunk by the lessee during 2016 should be furnished in this para with locations, dimension of trial pits and lithology encountered.

- 11. Para 1.0 (j): In this chapter, justification of considering 32,592 tonnes of siliceous ore into proved reserve category (UNFC Cat. 111) are not furnished. Economic evaluation of siliceous ore, end use of such material, marketability and existing/proposed beneficiation or blending practice should be elaborated in details before placing siliceous ore into reserve category.
- 12. Para 1.0 (k): No exploration by drilled boreholes carried out by the lessee for heamatitic iron ore after approval of last Scheme of Mining dated 15.12.2015; hence for heamatitic iron ore reserve and resources should be furnished unchanged w.r.t. last approved document. Concurrent mine production in respect of heamatitic ore, from last estimation of reserve to till date, requires to be depleted from total reserve quantity. In view of above, section wise reserve and resources estimation table (table no. 20) should be duly corrected.

Justification of 95% siliceous ore recovery should be mentioned. Recovery analysis in respect of float iron ore for different size Fe particles should be mentioned while estimation of reserve and resources of float iron ore. Copy of the recovery analysis report from NABL or similar accredited laboratory may be enclosed with the document.

Justification of considering feasibility mineral resources for float iron ore (UNFC Cat. 211) is not mentioned in this para.

- 13. Para 1.0 (l): Reserve of the deposit may be updated as on 01.05.2019 by depleting concurrent mine production (during F.Y. 2015-16) for heamatitic iron ore (Ref. table no. 24).
- 14. Para 2.0 (a): Location of existing ore stocks (ROM and finished product) with available quantity may be mentioned in this para. Also, nos. of existing dumps (active and dead/stabilized) present within the ML area with extent and height should be mentioned in this para in a tabular format.
- 15. Para 2.0 (c): Year-wise, section-wise tentative excavation calculations should be mentioned in this para in a tabular format from F.Y 2019-20 to 2021-22.
- 16. Para 4.0 (a): Year-wise dumping and backfilling should be mentioned separately in table no. 37. Areas proposed for dumping and backfilling to be mentioned separately for north and south blocks.
- 17. Para 4.0 (c): Backfilling is proposed at north block (Pit no.1) from 2020-21 and 2021-22. Proposed mode of disposal of waste generated at south block reef mining is not discussed in this para. In table no 38, dumping and backfilling quantity for north and south blocks should be shown separately.
 - Environment protective measures like construction of retention wall, gully plugs and check damps should be undertaken along the toe of the proposed active surface dump (AD-1) to prevent escape of material. Year wise such proposals may be furnished here in a tabular format.
- 18. Para 5.0 (e): Proposed use of siliceous iron ore and blending may be discussed in this para.
- 19. Para 8.3.5: In summary of year-wise proposal for item no. 8.3, no afforestation along waste dumps has been proposed in table no. 47, may be corrected accordingly.

20. Para 8.6: In the Financial Assurance table, "area put on use at the start of Plan" period should be updated as on 01.05.2019. In last approved Scheme of Mining, approved by IBM dated 15.12.2015, total area proposed for waste dumping at the end of 2016-17 was proposed as 5.61 Ha.; but in this submission existing waste dumping area has been mentioned as 12.80 Ha. Similarly, area covered by the mineral stock has been incorrectly shown as nil. Area covered under the item head 'Others' is not found elaborated in the table. In view of above deficiencies the Financial Assurance table should be duly corrected and refurnished.

Valid Bank Guarantee against Financial Assurance should be enclosed with the document in accordance with Rule 27(1) of MCDR, 2017.

PART-B

- 21. Para 10, Plates:
 - a) Surface Plan (Plate no. II/a): Lease boundary pillars should be demarcated as per the joint sketch, locations of corner pillars A and B may be shown in the plan. Extent of waste dump ID-1 should be corrected in the surface plan. All existing ore/ sub-grade stacks to be shown in the plan.
 - b) Geological Cross Sections (Plate no. II/c): Sectional interpretation of subsurface ore body and litho-contacts of reef iron ore should be furnished in accordance with the last approved Scheme of Mining, approved dated 15.12.2015 in all sections; except for the worked out mining benches thereafter. Collar levels of drilled boreholes from section nos. C-C' to E-E' should be corrected.
 - c) Working Plans (Plate nos. III/a to III/c): Proposed year wise locations of mineral stacks and haul road from working pit to active waste dump should be demarcated in all plates. Year-wise proposed afforestation and other environment protective measures also to be demarcated.
 - d) Dump Management Plan (Plate no. VI/b): This plate should be prepared considering the proposals of dump management upto F.Y 2021-22.
 - e) Financial Area Assurance Plan (Plate no. VII): This plate may be corrected in accordance with the comments offered for para no. 8.6, text part.
- 22. **Para 11, Annexure:** Any type of stamping should be avoided in annexure. Following items are required to be annexed with the document:
 - a) Copy of the monthly progress report on R & R (latest) submitted to the Monitoring Committee.
 - b) Corrected feasibility study report, details of the drilled RC boreholes and trial pits to be corrected.
 - c) Copy of chemical analysis report of trial pit samples obtained from NABL or similar accredited laboratory (at least 10% of the collected samples).
 - d) Copy of the recovery analysis report of float iron ore (size-wise, grade-wise).
 - e) Copy of valid Bank Guarantee in accordance with Rule 27(1) of MCDR, 2017.
