

SCRUNITY COMMENTS ON DRAFT REVIEW AND UPDATION OF MINING PLAN IN RESPECT OF SHIVAVILAS TRUST IRON ORE MINE OF M/S SHIVAVILAS TRUST, ML NO. 2646, EXTENT 19.22 HA., SITUATED NEAR RAMGAD VILLAGE, SANDUR TALUK, BALLARI DISTRICT OF KARNATAKA STATE

COVER PAGE

1. Name of the document should be corrected as “Review and Updation of Mining Plan including Progressive Mine Closure Plan”.
2. Submission of Progressive Mine Closure Plan under Rule 23 of MCDR, 2017 also to be included in the cover page.
3. Proposal period of RMP and validity of the mining lease as per the executed lease deed also to be mentioned on the cover page.
4. IBM Registration no. and the mine code, if any, also to be mentioned in the cover page.

INTRODUCTION

5. Reference and proposal period of last approved mining plan, status of other statutory clearances like 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 nine years should also be discussed.
6. Para 1.0 (a): Name of the ‘nominated owner’ on behalf of the Shivavilas Trust should be mentioned here.

LOCATION AND ACCESSIBILITY

7. Para 2.0 (a): Validity of the mining lease as per the lease deed should be mentioned here.
8. Para 2.0 (b): Identification nos. and co-ordinates of the boundary pillars/boundary marks should be furnished in accordance with the lease sketch, certified and issued by the State DMG-Karnataka.
9. 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 MINING PLAN

10. Para 3.1: Proposal period of last approved mining plan should be mentioned here.
11. Para 3.3: Proposals in respect of exploration, excavation, reclamation should be mentioned in this para in accordance with approved mining plan.

PART-A

12. Para 1.0 (c): Mode of occurrences and quality of siliceous iron ore should be discussed in the local geology.
13. Para 1.0 (i): Entire potential mineralized area within the lease should be explored by detailed exploration (G1 stage) within a period of five years from the date of opening of the mine after execution [ref. Rule 12(3) of MCDR, 2017]. Since the deposit is virgin in nature,

additional mineralized areas if encountered during the course of mining, require to be identified and suitable exploration proposal may be given during next RMP period.

Also, as observed during the course of inspection and from the geological plan that few boreholes require to be proposed along the iron ore band located south eastern side of the ML area, between section nos. E-E' to J-J', to confirm delineation of the ore body at subsurface.

14. Para 1.0 (j): In economic evaluation of feasibility study report, Capital cost, Royalty, provisions of paying royalty against DMF and NMET have not been considered; may be corrected accordingly.
Also, economic evaluation of siliceous ore, end use of such material, marketability and existing/proposed beneficiation or blending practice should be elaborated in the feasibility study report before placing siliceous ore into reserve category.
15. Para 1.0 (k): While estimation of reserve and resources of the deposit, recovery factor has been considered as 100%, contradicting the statement made in page no. 15 where recovery is mentioned as 95%. Recovery of iron ore should be clarified with appropriate justification. Copy of the analysis reports of drilled boreholes obtained from NABL or similar accredited laboratory should be enclosed with the document (at least 10% of the collected samples).
16. Para 1.0 (l): Summary of reserve and resources should be furnished separately for Hematitic iron ore and for siliceous iron ore in table no. 8.
17. Para 2.0 (b): Tentative estimation of top soil generation during 2019-20 should be furnished in table no. 29.
18. Para 2.0 (e): In locations of proposed mine workings and proposed waste disposal, top and bottom levels should be corrected (ref. table nos. 13 and 14). Adequacy of mining machineries in light of total handling should be furnished in this chapter.
19. Para 4.0 (a): Proposal for concurrent utilization of top soil during 2019-20 for plantation purpose should be mentioned here.
20. Para 4.0 (c): Dimensions of proposed environment protective measures like contraction of retaining wall, garland drain, settling tanks etc. to prevent escape of material from the active waste dump should be mentioned in this para in a tabular format (for F.Y. 2019-20).
21. Para 5.0 (e): Proposed use of siliceous iron ore and blending may be discussed in this para.
22. Para 7.0 (b): In employment potential, statutory requirement of mining engineer and geologist should be furnished as per the provision of MCDR, 2017.
23. Para 8.3.5: In proposed reclamation and rehabilitation measures during 2019-20, plantation along the safety barrier zone has not found included (ref. table no. 26).
24. Para 8.6: In the Financial Assurance table, 'area put to use at the start of plan' period, additional area requirement under 'mineral storage' has been mentioned as 0.50 Ha., which contradicts with Tentative Excavation Plan where it has been shown in much larger extent. Valid Bank Guarantee against Financial Assurance should be enclosed with the document in accordance with Rule 27(1) of MCDR, 2017.

PART-B

25. Para 10, Plates: In all plates irrelevant description above the title block may be removed.
- a) Surface Plan (Plate no. SV01-MD1): Identification nos. of boundary pillars/ marks should be furnished in accordance with the lease sketch, certified and issued by the State DMG-Karnataka. Co-ordinates of the Boundary Pillars should be mentioned in this plan.
 - b) Geological Plan (Plate no. SV05-MD1): Ore body demarcation should be furnished within the lease area.
 - c) Geological Sections (Plate no. SV06-MD1): Sectional interpretation of siliceous iron ore require to be corrected in all sections; in all cases it have been projected as quadrilateral in shape, irrespective of borehole intersections. Blocked ore (UNFC Cat. 211) should be marked in the sections.
 - d) Drilled borehole logs should be enclosed as annexure.
 - e) Tentative Excavation Plan (Plate no. MP061-MD1): Location of proposed ore stack should be corrected in this plan; proposed haul road from mining area to waste dump and to ore stack should be demarcated in the plan.
 - f) Environmental Plan (Plate no. SV08-MD1): This plan is not found prepared in accordance with Rule 32(5) (b) of MCDR, 2017. Proposed environmental monitoring stations also have not demarcated in the plan. Various types of proposed environment protective measures viz. afforestation, retaining wall, check dams, gully plugs and other measures required in this terrain are not shown at appropriate places.
 - g) Financial Area Assurance Plan (Plate no. SV11-MD1): This plate may be corrected in accordance with the comments offered for para no. 8.6, text part. Colour and index for all item heads should be differentiated in this plan ('waste dump' and 'others' have been demarcated with same colour and index).
26. **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 certificate of incorporation of Shivavilas Trust and memorandum of the association.
 - b) List of the trustee members.
 - c) Copy of the trust resolution on nominating the authorized signatory.
 - d) Copy of photo Identity Card of authorized signatory with permanent address proof.
 - e) Corrected detailed section-wise calculation for siliceous iron ore.
 - f) Copy of chemical analysis report of drilled boreholes obtained from NABL or similar accredited laboratory (at least 10% of the collected samples).
 - g) Copy of all drilled borehole logs.
 - h) Corrected feasibility study report.
 - i) Copy of valid Bank Guarantee in accordance with Rule 27(1) of MCDR, 2017.
 - j) Few photographs showing land use of the lease area, environmental status of the area.
