

**SCRUNITY COMMENTS ON THE DRAFT MODIFICATION IN APPROVED REVIEW AND UPDATION MINING PLAN IN RESPECT OF RAMANADURGA IRON ORE MINE (ML NO. 2141) OF M/S SRI KUMARASWAMY MINERAL EXPORTS PVT. LTD., OVER AN AREA OF 59.36 HA. (AS PER CEC SURVEY), SITUATED AT RAMANADURGA RANGE, SANDUR TALUK, BELLARY DISTRICT OF KARNATAKA STATE**

**COVER PAGE**

1. Actual period for the modification should be corrected as from February 2019 to 2021-22.
2. Category of the mine may be written as ‘Open-Cast, Cat. A, Fully Mechanized, Non-Captive.’
3. Educational qualification of the qualified person may be mentioned in the cover page.

**INTRODUCTION**

4. Date of first grant of ML, date of commencement of mining operation, subsequent lease renewals with period before enactment of MMDR(amendment) Act 2015 should be mentioned here briefly. Also, status of the EC and other Govt. orders pertaining to this ML should be mentioned in this chapter.
5. Reference of CEC approval letter regarding enhancement of production permissible limit to be mentioned here. Copy of the letter may be enclosed as annexure.

**LOCATION & ACCESSIBILITY**

6. Para 2.0 (a) : E-mail, contact nos. and other details of the lessee should be mentioned in accordance with submitted latest Annual/Monthly return, submitted under rule 45 of MCDR, 2017.
7. 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 for that 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 REVIEW AND UPDATION OF MINING PLAN**

8. Para 3.2: Reasons for last two modifications of approved RMP should be furnished separately for each occasion.
9. Para 3.3: In review of exploration, excavation, reclamation etc. all review positions may be furnished for 2017-18 and upto 01.02.2019 for F.Y. 2018-19.
10. Para 3.6: Main two factors for present modifications viz. enhancement of proposed production and enhancement of reserve and resources by additional exploration should only be discussed in this para. Other unrelated comments may be removed.

**PART-A**

11. Para 1.0 (c): In geology of the lease area physical and chemical property of siliceous iron ore and mode of occurrence may be discussed with recovery% and quality of lumps and fines.
12. Para 1.0 (i): In table no. 1.17, borehole proposals should be mentioned from F.Y. 2019-20 to 2021-22. Proposed exploration programme should cover entire mineralized area as per the provision of Rule 12(4) of MCDR, 2017.
13. Para 1.0 (j): In this chapter, justification of considering 0.648 million tonnes of siliceous ore (ref. page no. 35) into reserve category 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 the feasibility study report before placing siliceous ore into reserve category. In all tables reserve and resources position should be updated as on 01.02.2019. In table no. 1.19, UNFC codes of probable mineral reserve (121 & 122) and pre-feasibility resources (221 & 222) should be corrected in accordance with table no. 1.14.

14. Para 1.0 (k): Following deficiencies have been observed in this para :
  - a) While estimation of reserve for siliceous iron ore, recovery factor is considered as 90% (ref. page nos. 49 to 52); the same required to be justified here. Section wise detailed reserve and resources calculation should be updated as on 01.02.2019.
  - b) Since ore handling of this mine is more than one million tonnes per annum, Reserve and Resource calculation also to be furnished 'level wise slice plan' method. Variation of ore estimation, between 'cross sectional area' method and 'slice plan' method, if any, may be given.
15. Para 1.0 (l): An updated reserve and resources table should be included in this para as per the standard guideline of preparation of document.
16. Para 2.0 (a): Location of sub-grade stocks with available quantity may be mentioned in the table no. 2.5, also proposed handling period of such material also to be discussed here.
17. Para 2.0 (b): Mine production during F.Y. 2018-19 (balance period) should be proposed only for the remaining production quantity as per the CEC approved revised permissible annual production (i.e. 1.48 million tonnes per annum). Achieved mine production during F.Y. 2018-19, till 31.01.2019, may be removed from the proposal. Type of 'other waste' should be mentioned in the table no. 2.9.
18. Para 2.0 (d): During site inspection, it was observed that BHQ waste has been temporarily stacked at Pit C bottom; year-wise disposal method of BHQ should be mentioned in this para in a tabular format duly mentioning proposed quantity, bottom and top levels, nos. of stages and location.
19. Para 4.0 (c): Environment protective measures like construction of retention wall, gully plugs and check dams should be undertaken along the toe of the proposed active surface dumps (D2 & D1) to prevent escape of material. Year wise such proposals may be furnished here in a tabular format.
20. Para 5.0 (e): Proposed use of siliceous iron ore and blending may be discussed in this para.
21. Para 7.0 (b): In employment potential, statutory requirement of mining engineer and geologist should be furnished as per the provision of MCDR, 2017.
22. Para 8.6: In the Financial Assurance table, 'area put on use at the start of mod. RMP period' should be updated as on 01.02.2019. Additional area requirement for 'waste dumping' should be corrected as entire sub-grade stacks (SG1 and SG2) will be under active dumping at the end of F.Y. 2021-22. Similarly, area covered under sub-grade stacks should be shown as nil at the end of the plan period.  
Additional area requirement under infrastructure head also to be corrected as existing mine office, canteen and workshop are proposed to be shifted along north-western side of the lease.

## **PART-B**

23. **Para 9:** Signature of the nominated owner in all undertaking/ certificates should be in original. An additional undertaking from Qualified Person may be enclosed stating "all plans and sections have

been prepared based on the precise area map authenticated by the State Government of Karnataka.”

**24. Para 10, Plates:**

- a) Surface Plan (Plate no. 2): Extent of sub-grade stack SG2 and active dump D2 should be corrected in the surface plan. BHQ dump should be marked separately in the plan. Positions of mining haul roads may be updated.
- b) Production and Development Plans (Plate nos. 5 to 5C): Bench rectification work should be undertaken during F.Y 2018-19 along section nos. Q-Q’ and R-R’. Instead of demarcating entire pit no. B as proposed mineral stacking areas; year-wise particular stacking areas should be shown in respective plans. Year-wise proposed afforestation and other environment protective measures also to be demarcated.
- c) Financial Area Assurance Plan (Plate no. 10): Areas proposed to be under utilization at the end of the F.Y. 2021-22 should be demarcated in this plan. This plate may be corrected in accordance with the comments offered for para no. 8.6, text part.

**25. Para 11, Annexure:** Any type of stamping should be avoided in annexure. Following items are required to be annexed with the document:

- a) Certificate of registration of the company.
- b) Copy of the CEC approval letter on revised permissible annual production.
- c) Copy of chemical analysis report of recently drilled boreholes from NABL or similar accredited Lab.
- d) Copy of the required Bank Guarantee, valid up to 31.03.2022.

\*\*\*\*\*