

**Scrutiny comments on Mining Plan including Progressive Mine Closure Plan in respect of Gothra Limestone Area over 624.0 hectares (ML No 47/07) near village-Gothra, Choudhani, Devgaon & Keshwa ki Dhani; Tehsil- Nawalgarh, District- Jhunjhunu applied by M/S Shree Cement Limited, Submitted under rule 16 of MCR 2016& 23 (B) of MCDR 1988 for Fresh Grant of mining lease.**

1. During the inspection of the area, boundary pillars were not found. Further, the precise area to be granted along with demarcation report, along with co-ordinates of the boundary pillars, duly authenticated by the State Government have not been submitted.
2. The nature of Government land may be clarified in item No. 2(d).
3. In the mining plan submitted, in the year 2008, the total drilling carried out for exploration for area is mentioned as 5784 meters where as in current submission, total drilling meterage is mentioned as 5820 meters. It may be reconciled and clarified.
4. It has been mentioned that whole mining lease area has been explored and proved under G2 category of exploration in accordance with Part III of Minerals (Evidence for Mineral Content) Rules, 2015. With this level of exploration involving 73 bore holes, it is possible to estimate the reserves/resources by cross sectional area method. The reserves/resources under various categories of UNFC may be also shown on cross sections.
5. Geological cross section has been furnished at 300 m interval. The same need to be submitted at 200 m interval corresponding to grid interval for G-1 level exploration. The L-section of the deposits may also be submitted.
6. It is mentioned at Page 21 that as per Mineral (Evidence of Mineral Content) Rules, 2015 that drilling at 200-400 m grid interval is required for G-1 level exploration which is incorrect. The grid interval for G-1 level in case of limestone as regular habitat is 200 m or less. It is therefore, suggested that proposals may be incorporated for exploring the area at 200 m grid interval and the exploration should be completed within first 2 years of the proposed plan period and detailed report on the results of exploration be submitted to this office. Further, it has been observed that bore hole GBH-40 on western side of area is having limestone beds of nearly 29 meters, but, no exploration is proposed on western side of this bore hole to prove continuity of strike extension. The future exploration programme may be logically prepared to delineate the limestone properly to define the ultimate pit limit correctly.

7. Justification for site selection for mining during first five years period should be given in the chapter of Mining, along with status of land acquisition for the area proposed to be utilized in next five years.
8. The conceptual pit limit has not been marked on sections of year-wise development plan.
9. The capacity of the cement plant and requirement of limestone may be discussed in chapter on Use of Mineral and accordingly annual capacity of mine needs to be ascertained and entire proposal of mining need to be revised as the proposed production is only 1.8 million tonnes against the likely capacity of Cement Plant at 2.0 million tonnes (or more). Further, the annual production plan should also consider quality of available limestone vis-à-vis availability of limestone needed for clinker production.
10. Conceptual plan need to be revised considering annual production, exploration at G-1 level, dumping of overburden in proper OB benches and area needed for the same, protective measures and reclamation and rehabilitation etc.
11. It is observed that crusher is proposed on western side of existing bore hole GBH-40 which have positive occurrence of limestone. Without proving the continuity of limestone bed on western side of this bore hole, establishing crusher is not proper. It is therefore, suggested that location of crusher may be relocated on proven non-mineralized area away from ultimate pit limit.
12. It is observed that waste dump No. 2 on the southern side of the lease area has not been proved for absence of under-laying mineral, as evident from the fact that bore hole is proposed at location S11 – E3 in the dump area. It is, therefore, suggested that no waste dump should be proposed in any area without proving absence of mineral content. The waste dump No. 2 may be relocated.
13. It is observed that overburden mainly consist of alluvium, for which dump height is proposed as 10 m. In view of soft nature of overburden a scientific study report may be submitted justifying 10 m dump height.
14. It is observed that there is no proposal for protective measures around the dumps like parapet wall, garland drain, creation of green belt around the dumps, dump slope stability etc. The same may be furnished in the text and may be shown on the relevant plates.
15. Cover page needs to be modified deleting the reference of RQP and submitting the document for applied area instead of a mine.

16. On the cover page it has been stated that the mining plan has been prepared by RQP giving its Id No & date of validity. Since as per new amendments there is no provision of RQP certifications, therefore, it needs to be omitted at all the places in the text & Plans. The copies of degree certificate and supervisory experience of qualified persons may be enclosed with the document.
17. A soft copy of entire document and plans should be e-mailed in PDF format. An undertaking in this regards by the Mining Engineer that soft copy contains same documents & plates as submitted by hard copy should be given. The text should be signed by the Mining Engineer on each page.
18. The affidavit for No dues of DMG or any other deptt & No court case/ litigation in connection with the area applied under ML should be furnished.
19. The serial no. of items as given in the guidelines for preparations of the mining plan should be maintained.
20. The LOI issued by the State Govt. with its validity should be annexed with the text.
21. The details of other lease hold areas presently held by the applicant in the country should be furnished.
22. It may be clarified that whether there is no forest sanctuary within 10 km of the lease area.
23. The plantation proposals/ green belt development has not been discussed in the Conceptual plan in Para 5 F), Page 39.
24. The generation of Sub grade mineral & its preservation for future use has not been discussed.
25. Chapter 11.4 The name & address of the competent Person in case of Emergency should also be stated.
26. The year wise Plantation proposals with the area & species of afforestation has not been given
27. It is observed that yearwise layout plan has been prepared for part of the lease area only which need to be prepared for the entire lease area.
28. Plans- The Electric line/ Telephone line/ High Voltage transmission lines passes/exists in the applied lease area have not been marked precisely & properly in Surface Plan, Surface Geological Plan etc.
29. In the key plan, the land use has not been defined in the index. The four colors used in the Key plan for denoting land use i.e. yellow, Dark yellow, brownish & pink has not been defined.
30. In surface geological plan the colour coding for denoting land use is improper, as only litho-units are to be denoted in SGP.

31. The feasibility report should incorporate all envisaged modifications suggested for mining plan & PMCP.

32. There are good number of typographic errors, omissions and spelling mistakes, which should be attended properly.