Scrutiny comments on draft Final Mine closure Plan for Unjanai& Pudupuliam -patti limestone mine over 4.95 hect in Unjanai & Pudupuliampatti villages Tiruchengode taluk of Namakkal district Owned by M/S Sivasakthi Enterprises submitted under rule 23(c)&23 (F) of MCDR.Mine code 38TMN23006.

General: Rule 24 and 27 of MCDR-2017 should be indicated in place of rule 23(c)&23(F) of MCDR-1988 in report.

- 1. Introduction: Reason for discontinuance and intimation regarding abandonment of mining operations has not discussed. It is indicated that "lessee had submitted surrender notice to state government", but no copy of acknowledgement letter is annexed . Further, statutory notice Form-D i.e. abandonment notice as required under rule 21(D) of MCDR-2107 has not been submitted to this office till date. Sivasakthi Enterprise being a partnership firm resolution by the members regarding abandonment of mine also to be submitted. Production and development carried-out during past five years need to be briefed under tables concerned, depth and width range of existing pit should be indicated in table co no.6 and other paras.
- 2.Para1.1: Reason indicated "Government stopped issuing permits" may be omitted as it is not proper reason for abandonment of mine.
- 3.Para 2.0(b): Width range of limestone band and colour of limestone indicated under the para should be corrected instead of white-pink and grey to brown.
- 4. Para 2.2: Mineral blocked under 7.5m safety barrier need to be excluded from resources as limestone intrusion in the form of band hidden within gneissic/schist country rocks all along the lease boundary North –South direction. Detailed bench wise/section wise updated reserves and quality of limestone should be discussed under the para. Hence, reserve&resources should be recalculated further, in contrary to limestone grade under para 2.3 as lowgrade ,whereas in table no -9 limestone indicated as cement and refractory should be corrected.
- 5. Para 3.1: Details furnished are not clear, exploration carriedout sofar and form J submitted in this regard with respect to quality of mineral need to be discussed. Detailed reclamation &rehabilitation process need to depicted indicating the available quantity of waste ,top soil and height of back filling of pit ,depth range of water reservoir and fencing of existing pit etc., to be discussed under Para 3.5.
- 6.Para 4.5:Top soil stored need to be used for afforestion programme instead of refilling of mine pit.
- 7.Para 4.9:Statement regarding fencing to mined-out pit is contrary to para 4.1, needs clarification/justification/correction.
- 8.Para 4.10:The dimensions of backfilled pit may be furnished in place of "no mine pit" furnished.
- 9.Para 5.0: All sub paras regarding Economic repercussions due to closure of mine and retrenchment of man power should be suitably discussed.
- 10. Para 7.0: All major expenses including plantation, fencing of ML area/pit should include under abandonment cost.
- 11.Para 8.0: BG amount calculated as per rule 23(F) of MCDR-1988 is incorrect. Therefore, financial assurance as required under rule 27(1) of MCDR-2017 need to be calculated and corrected, difference amount as per MCDR-2017 should be submitted along with bound copies.

Part-B

- 12. Consent letter/Certificate: Rules 23(c) &23(F) of MCDR-1988 and GSR notification dated 10.4.2003 indicated in certificate should be replaced with/corrected as 24 and 27 of MCDR-2017 and the certificate should bear the undertaking "all the measures proposed in this closure plan will be implemented in a time bound manner as proposed".
- 13. Soft copy of report in the form of CD has not been submitted. Plates
- 14. plate no.III: Plantation all along the boundaries of ML should be marked.
- 15.Plate no.IV-A: Inview of scrutiny on Para 2.2,limestone shown under resource should be corrected and redrawn.
- 16. Plate no.V,VII&VIII:All theses plates should represent the status of pit after carrying out of proposed reclamation &rehabilitation,accordingly the sections also be redrawn.
- 17.Plate no.VI: details of mine situated on the western side to ML should be labeled.