



भारत सरकार Government of India
खान मंत्रालय Ministry of Mines
भारतीय खान ब्यूरो Indian Bureau of Mines
क्षेत्रीय खान नियंत्रक का कार्यालय Office of the Regional Controller of Mines
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फाईल संख्या File No: 614(2)/MS-A-175/08-DDN

देहरादून , दिनांक 22-01-2021

सेवा में/ To : जी.एन. चौधरी / G.N Chowdry,

e-mail: gnchowdry@yahoo.com

17- इक्बाल कोलोनी, चनापोरा / 17-Iqbal Colony, Chanapora,

श्रीनगर, जे एण्ड के / Srinagar-190015 (U.T-Jammu & Kashmir)

विषय/Sub : Submission of Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Saman Limestone Mine, Mr. Manzoor Ahmad Guna, Mining lease over an area of 144.25 hectares located near Village-Khanmoh, Tehsil-Kanmoh, District-Srinagar, Jammu & Kashmir-U.T submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017

संदर्भ/Ref. : Letter from Mining lease holder vide No.786/SC/MP/28 dated 28.12.2020 received this office dated 06.01.2021

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Review and Updation of Mining Plan including Progressive Mine Closure Plan, hereinafter refer as RMP, on 06.01.2021. The same has been examined and found incomplete and incorrect. Various discrepancies/deficiencies/in-consistencies/gaps were observed which has been listed in enclosure to this letter as **scrutiny comments**. One copy of RMP has been forwarded to the State DMG, in case receipt of any comments from them the same shall be communicated to you subsequently.

You are advised to correct the submitted intial/draft RMP by addressing the incomplete details /information/inconsistencies/discrepancies/deficiencies appropriately and carry out necessary/required modifications and submit the mining plan afresh in **3 fair copies** within **15 days** from the date of issue of this letter in hard bound copies (no spiral binding) along with checklist (changes made scrutiny point wise). Also submit two CDs containing entire RMP i.e. text, plates, annexures, cover letter of final submission and checklist etc. In case if any other changes made in the RMP other than scrutiny comments, the details and reason/justification for doing so shall be given along with page numbers/plate no/annexure no. etc. You are advised to prepare the fair copies carefully and ensure that it is correct in all respect and submitted to this office within stipulated time. It is also advised to use both side paper to best possible extent, also optimize the use of drawing paper used in plates.

If the afresh/fair copies of Review and Updation of Mining Plan including Progressive Mine Closure Plan not received at this office within stipulated time then final action will be taken appropriately. Further if again deficiencies are observed then final action will be taken by this office without returning the copies for correction.

This issues with the approval of competent authority

Encl: as above.

भवदीय Yours faithfully,

22.01.2021

(दामोदर प्रसाद शर्मा / D. P. Sharma)

सहायक खान नियंत्रक /Assistant Controller of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुरा (zo.udaipur@ibm.gov.in)

2- Mr. Manzoor Ahmad Guna, Opposite Post Office Batawara, Srinagar 190004 (J&K-U.T) (saifco_786@yahoo.com)

सहायक खान नियंत्रक /Assistant Controller of Mines

Scrutiny comments, indicating incomplete details /information/inconsistencies / deficiencies etc in initially/draft submitted Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Saman Limestone Mine, Mr. Manzoor Ahmad Guna, S/o Late Saif-ud-din Guna, Mining lease over an area of 144.25 hectares located near Village-Saman, Tehsil-Panthachowk, District-Srinagar, Jammu & Kashmir-U.T submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2021-22 to 2025-26.

- 1) Cover page:
 - a. Lease period is not matching with lease deed. Lease period should be supported with document proof.
 - b. ML No. if any shall be mentioned beside Mine Name.
 - c. U.T shall be written instead of State.
- 2) On Page No.1, Para 3, Lease validity is not correct.
- 3) On Page No.6, Para in Reclamation/ Rehabilitation, it is mentioned that no bench has reach ultimate pit limit then how could it be 4.5246ha shown in reclamation in financial assurance table.
- 4) On page No.7, Status of compliance of violations pointed out by IBM shall be provided.
- 5) On Page No.11-12, it is stated that 20 boreholes drilled each of 20m depth whereas at page no.5, para3.3 it is mentioned that 10 boreholes of 15m depth and 10 boreholes of 225m depth drilled in the area which is contradictory.
- 6) On Page No.13, It is stated that limestone of B2 bed contains CaO content below 38% i.e. below threshold value decided by IBM is not true. Threshold value decided by IBM for limestone is 34% CaO.
- 7) On Page No.14, Plates of geological sections is not correctly indicated as plate no.5 &6 in place of plate No. 5A, 5B & 5C.
- 8) On Page No.13-15, Limestone of B2 bed is stated as siliceous & argillaceous with total carbonates 58-70% and CaO -38% resulting B2 bed has not considered as mineralized area. Whereas, in conceptual plan, limestone of B2 bed considered for extraction thus there are contradictory statements regarding quantity of limestone of B2 bed.
- 9) On Page No.16, Though it is a working mine since more than 20 years, still resources have been considered under area to be explored fully as per rule 12(4a) of MCDR, 2017 (G4 axis which shall be converted accordingly).
- 10) On Page No.17-20, considering the location at section 1-1', section 2-2', section 3-3' in Bed-1 estimation of reserves is not realistic with area and quantity of reserves.
- 11) On Page No.20, Ultimate Pit limit taken into account for reserves estimation is stated as 1830mRL baseline which is not acceptable. It is revealed that most of the boreholes drilled for depth of 15m so in estimation of reserves on mineralization of such depth can be taken into account not up to 1830mRL.
- 12) On page No.27, Area and quantity under UNFC code 121 and 122 shall be reviewed and Review the estimation of geological Resources under 122. Review surface geological plan, sections and review the Reserves & Resources accordingly.
- 13) On page No.28, it is to be explained appropriately that how the total reserves and resources drastically increased and it is unrealistic when compared to previous approved Review & Updation of Mining plan with minimal exploration.
- 14) On Page No.29, category of mine is mismatching with cover page and elsewhere in the document.
- 15) On Page No.29, Proposed exploration is indicated up to 2022-23 whereas at some places it is given 2021-22.
- 16) On Page No.31, permissible limit of ground vibration is not correct as per DGMS circulars.

- 17) On Page No.32, Hole-depth with sub-grade drilling is even more mismatched with provided bench height; hence review the drilling parameters with suitable depth and give authentic & correct figures.
- 18) On Page No.36, Pit slope is not correct from mineral conservation point of view. Furthermore surface area would be affected for degradation. It should be scientifically designed.
- 19) On Page No.41, Drilling and blasting calculation table is mismatching with bench design and production. And in Para of charge per delay, given depth of hole blasted is mismatched with bench height (bench parameter)
- 20) On Page No.42, requirement of dumpers for production is not matching with details given on page No.30.
- 21) On Page No.43, Para f, total mineable reserves are not matching with table given on page No.28, Page No.44, Page No.45 and elsewhere in the document.
- 22) On Page No.43, Overall pit slope is given 33°. Scientific evidence shall be provided with respect to given bench parameters. Slice plan shall be provided. Furthermore surface area would be affected for degradation. It should be scientifically designed.
- 23) On Page No.45, area for plantation with respect to saplings proposed is not realistic. Atleast it should be considered by 2m*2m.
- 24) On Page No.48, maximum and minimum depth of workings is not matching with production and development (both in text and plans) during plan period.
- 25) On Page No.52, Flow chart of material (processing) is not evidenced. Is the crusher in lease area?
- 26) On Page No.53, water balance chart is not provided.
- 27) On Page No.55, Table 8.1, area under mining in existing land use pattern is not matching with table No.8.3 on page No.58 and page No.80.
- 28) On Page No.58, Table 8.3 is not correct at S.No. 6, 7 & 10.
- 29) On Page No.64, No documented evidence is provided to claim 8.1870 ha under green belt/rehabilitation/reclamation. And mentioned area is also contradictory with financial assurance plan. Which one shall be considered?
- 30) The area of the mine till end of the lease validity (conceptual stage) is not matching with details given on page No. 47 in the document.
- 31) On Page No.72-76, in table, summary of year wise proposals is incorrect w.r.t proposals given in no. of trees and length of barbed wire fencing.
- 32) On Page No 80, In the table at Para 8.6, the area of 4.5246 hectares under head "Area fully considered as reclaimed and rehabilitated" is given which cannot be considered as the area shown on plan is mineral bearing area as evident from the sections provided with this mining plan. Besides this, the reclamation and rehabilitation is done where the mineral is completely taken out, whereas, no such type of excavation is not evident in that area. Further fully reclaimed and rehabilitated area is not reflected from any of the yearly report submitted under rule 26(2) of MCDR 2017. Thus, the rehabilitation of this share of area is not true. Thus correct area put to use to be given and accordingly, calculation of financial assurance shall be made afresh and financial assurance as per rule/guidelines shall be submitted with final submission of mining plan with PMCP.
- 33) Bio-fencing may be included/explored and if appropriately.
- 34) Adequate mitigative measures shall be proposed to arrest the roll down material/muck/boulders/mine-waste/seepage water into gorge as evidence of natural slope heading towards east direction as per mine topography.
- 35) As per the Hon'ble Supreme Court of India order dated 08/01/2020, re-grassing of mined out area to be carried out. Accordingly, proposals may be furnished for restoration/reclamation/re-grassing of mined out area.

Annexure:

- 36) All test reports (air, water, noise) shall be updated.

Plates:

- 37) Authentic lease plan shall be the basis for the preparation of all the plans and sections. There should not be any deviations in all the plans and sections with respect to configuration given in the lease plan.
- 38) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
- 39) Surface Plan, Plate No.3:
 - a. No. of pits are evidenced in plan and their naming shall be provided. All existing features shall be properly addressed.
- 40) Surface Geological Plan, Plate No.4:
 - a. Ultimate pit limit is not shown in index as per guidelines
 - b. UNFC code & Axis of exploration shall be clearly demarcated and colored separately.
 - c. All proposed bore holes shall be demarcated in line with given text.
 - d. Location of proposed bore holes shall be reviewed w.r.t statutory boundary.
 - e. Area under G3 is given zero ha in text whereas it is shown in plan. It shall be reviewed.
 - f. Area under G1 is given 123 ha, it shall be clearly demarcated in the plan.
- 41) Sections for Surface Geological Plan, Plate No. 5a, 5b, 5c:
 - a. All the sections are not matching in line with bed wise, UNFC code in SGP, Plate no.4
- 42) Development plans and section, Plate No. 6-10:
 - a. Detrimental to closure activities.
- 43) Conceptual plan, Plate No. 11:
 - a. Conceptual plan is not realistic in terms of Lease validity.
 - b. Conceptual plan is not realistic in terms of area given on text, at page no. 44.
 - c. Conceptual Sections do not match with Conceptual Plan w.r.t no. of benches, bed and features.
 - d. Conceptual sections shall be adequately given.
 - e. Excavation is evidenced beyond ultimate pit limit to be explained/reviewed.
 - f. Existing ground profile shall be given in sections
- 44) Reclamation Plan, Plate No.12:
 - a. Ultimate pit limit is not shown in index.
 - b. Proposed configuration of pit shall also be the part of PMCP. Thus utmost care is to be taken while preparing PMCP proposals and its implementation in its plan and sections.
 - c. Predominant wind direction is not shown.
 - d. Bio-fencing to be tried as a sustainable, PMCP proposal.
- 45) Financial Assurance plan, Plate No. 13
 - a. Sum of the existing area under mining is not matched with the table.
 - b. Review the net put to use area and accordingly furnish the BG for financial assurance.
- 46) Environment Plan, Plate No.14:
 - a. Environment Plan is not as per Rule 32(5)(b) of MCDR 2017, important features i.e. plan prepared under scale 1:2000 thus features beyond 500m is not evidenced. Other mining lease areas, if any excavations etc. within 500m are not shown

Other Scrutiny Points:

- 47) The mine is located in hill slope of the high altitude mountainous terrain susceptible for seismic, other ground movement. Hence adequate proposals should also be incorporated in the document like controlled blasting techniques, erecting retaining walls, check dams, parapet walls to ensure safe, secure and systematic mining for ensuing long term period. Proposals shall be incorporated appropriately so that the adjacent environment, flora, fauna, public in villages shall not be affected by roll-down of any boulder/material or any other material etc from mine to outside.
- 48) Proposals for development of pit through proper benching in particular at the end of 5 years and also at the time of expiry of lease shall be considered towards closure activities. As leaving steep and extra height benches would be detrimental to the environment especially from land degradation point of view. Therefore, utmost care shall be taken while deciding the pit geometry/pit layout, haulage routes etc
- 49) Plan & design of pits, benches & excavation shall be in such a manner that by natural the flowing material from mine towards low lying areas is trapped/arrested appropriately.

- 50) The sufficient number of colored photographs of the area showing existing status of the lease area, benches, boundary pillars, mines office, etc may be submitted with proper captions
- 51) All the proposals should be made within ML only.
- 52) Review of the Mining Plan has not been prepared as per guidelines
- 53) All the plates should be verified by Surveyor, for their authenticity and also to certify that prepared plans and sections are based on the lease map authenticated by the State Govt.
- 54) All the annexure should be attested by qualified person for their authenticity.
- 55) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 56) There are several typographical mistakes which required to be corrected.
- 57) Two CDs covering the entire document and plans should be enclosed at the time of final submission .Undertaking in this regard by qualified person should be given that the CD contains the same text & plates as submitted in hard copy. KML file shall also be submitted along with final submission.
- 58) Note: All the corrections mentioned in the text and plates shall also be attended invariably

