Inspection report cum scrutiny comment on the Review of Mining Plan submitted by Dalmia Cement Bharat Limited on behalf EEswar Cement in respect of Kotapadu Limestone Mine (234.032 hectare), village Kotapoadu, Kolimigundla Mandal, Kurnool after field inspection dated 12/12/2017.

 As per the documents made available, lease was granted in the name of Eeswar Cement under the provisons of MMDR Act, whereas DOCUMENT is submitted in the name of Eeswar Cement Limited with undertaking for consent certificate is given by M/s Dalmia Cement (Bharat) Limited.

The copy of the scheme of amalgamation is submitted for Eeswar cement Private Limited and Dalmia Cement (Bharat) Limited. Thus the ownership of the lease is not clear. Clarify along with the documentation.

Clearly submit the status of change of name from Eeswar Cement to Dalmia Cement Bharat Limited as per Company's Act as well as MMDR Act separately along with the documentary proofs. The required documentation showing complete linkage for name change, document be submitted.

- In the absence of order from the State Government as per MCR provisons regarding change of name to Dalmia Cement (Bharat) Limited, the document should be submitted in the name of Eeswar Cement only. No submission regarding Dalmia Cement (Bharat) Limited is accepted in the entire document accept Introduction where the linkage need to be established between Eswar Cement and Dalmia Cement (Bharat) Limited.
- 3. Incongruent submission has been given regarding commencement of mining operation on page 1. As per the submission in the document, the notice of commencement of mining operation has been submitted by the lessee on 26.10.2015, so the submission that the mining operation are yet to commence is incorrect. Further the notice regarding temporary discontinuance of the mine has not been submitted.
- 4. In the Introduction chapter clearly submit whether any notice or order regarding lapsing of lease has been issued / received by them. Also submit the status of extension of lease period.
- 5. Name and Status of applicant need to be correctly submitted in para 1.0. In para 1.0(a), the name of nominated owner as per Mines Act and the resolution of Board of Director in favour of the nominated owner be referred to the Annexure number.
- 6. In para 2.0(b), Type of applied land need to be submitted as per the format prescribed for the purpose after checking the same from the records.

Type of Land	Area in Hect.	Area acquired in Hect.
Forests	 Reserve forest Protected forest Unclassified Sanctuary/ National Park 	
	Sub-total	
Nor-forest	(i) Private land	

(ii) (a)Agricultural:
Irrigated
Non-irrigated
(iii) Government land
(a) Grazing
(b) Waste
(iv) Other(classify)
Sub-total

Review of Mining Plan:

- 7. Exploration: The exploration as proposed in previous document has not been undertaken for which the reason has been submitted as 'non availability of work permit', is not acceptable as there is no legal order in support of it is enclosed. Further the lessee has undertaken the exploration in 2015-16 itself. So the submission is contradictory and hence should be corrected immediately as part of backlog exploration. The same should be recorded.
- 8. Development: Size of the development i.e, length breadth depth viz —a viz achievement be recorded.
- 9. The review of top soil generation be submitted. The top soil was proposed to be used for plantation in 7.5m safety zone and stacked separately at the earmarrked site, but the same has not been done. The rectification action be proposed immediately.
- 10. Review of environmental parameters be submitted. Clearly submit whether the environment monitoring has been done as per proposal or not.
- 11. Review of Afforestation: It has been noted that the afforestation by means 3000 plants was proposed over 2 hectare land but the same has not been undertaken. The corrective action be proposed immediately.

Geology:

- 12. In Part A 1.0(d) and e, submit the information regarding phase wise exploration undertaken.
- 13. In the local Geology the grade range of various lithounits encountered as a result of phasewise exploration be furnished as per exploration data generated so far.
- 14. In Part A 1.0(g) submit whether the survey has been done with reference to the boundary pillar coordinates certified by the State Government or not. Also submit in text the Bench mark, it's location from where the survey has been done for surface features. Also submit whether the bench mark has been connected to national grid as submitted in the key plan.
- 15. In para 1.0(j), submit the classification as per MEMC Rules. The word cut off grade and threshold value has not been used correctly.
- 16. In para 1.0(I), submit the area under different level of exploration.
- 17. In the G4 area lying in the north of the lease, on the foot hills, the flaggy limestone pits are exposed and the southern portion is having agriculture land. The Geological map confirms that the southern portion of the lease is covered with soil, as such to establish the geological resource in the area precisely, the exploration was proposed by you in the last document. The resources under G4 category be assessed and established after under taking detailed exploration, which is already pending.

- 18. In the Geological Plan the dip has been assigned in the soil covered area where data exposuress not visible. Hence be corrected.
- 19. In the light of above the resource estimation need to be corrected.

Mining

- 20. No production has been done since the inception of mine. Further, the proposal has been given for mining of about 8.5 lacs tonnes of limestone, which need to be justified considering the present installed plant capacity, limestone requirement, approved mining plan capacity at present and the proposed changes.
- 21. As per MCDR Top soil bench need to be kept sufficiently ahead of mineral bench to avoid mixing. The same is not reflected in the plates for the purpose.
- 22. In Part 2.0© and 4.0(a), The yearwise location for stacking of soil has been submitted at a site explored for presence or absence of mineral. As per MCDR top soil be stacked at a site earmarked for the purpose as per MCDR, preferably on the 7.5m boundary where it can be used for planatation. After the exhausation of the land for the purpose, the proposal for stacking may be considered and that too in an area which is proved for non mineralization. Justify the sufficacy of the area proposed for top soil stacking and utilization.
- 23. The grid lines between which the working is proposed and up to what depth be recorded. The benches proposed to be worked be recorded as well.
- 24. Also submit the status of permissions taken for use of HEMM, explosives etc.
- 25. Submit the explosive sourcing, magazine capacity etc for this mine.
- 26. The bench position on 31st March 2018 be assessed and submitted in the plate/ document in conformity with last approved document and subsequent planning be done therefrom.
- 27. The extent of mechanization, be justified w.r. to the comments made regarding production capacity.
- 28. This chapter should be recasted, drawn and projected to visualize the status of lease at the end of lease period as per available data only, which may change subsequent to exploration proposed. Conceptual excavation, reclamation, afforestation, backfilling be discussed as poer the available data and also supported by suitable number of plans and sections both in transverse and longitudinal directions passing through lease boundary, pits, dumps etc.

Progressive Mine Closure Plan

- 29. The land use classification be given as per the format of land put to use
- 30. Progressive reclamation plan be drafted properly showing yearwise prop[osals
- 31. Summary for yearwise proposal for reclamation be discussed in 8.3.5 as per format for preparation of Mining Plan/ treview available on IBM website.
- 32. The land put to use be assessed correctly as per the above comments.
- 33. All the plans and sections should have certificate by QP 'That the plans and sections are prepared basd on the lease map authenticated by the State Government.

34. If due to aforesaid changes, the data in other chapter or plates changes, they may please be done accordingly and ensure the consistency of the data submitted in various chapters of the document.	