

**SCRUTINY COMMENTS ON THE REVIEW OF MINING PLAN IN RESPECT OF MALKAPURAM LIMESTONE & DOLOMITE MINE OF SRI S.SUBOSE OVER AN EXTENET OF 4.123 HA IN SY.NO. 709/2 & 705(P) OF MALKAPURAM VILLAGE, DHONE MANDAL, KURNOOL DISTRICT, AP – SUBMITTED UNDER RULE (17(2) OF MCR, 2016**

During the field inspection, the lessee was advised to drill two DTH in between the old pits within 3 days and submit the Form-I and Form-J within a week time as the lessee has not carried out any exploration so far. Lessee was advised to send photographs and video of the exploration carried out and to collect meter wise face sample from each pit and analyse in NAB Laboratory and to submit the analysis report within a week's time and he accepted to do the same. Based on the exploration data, the Geological plans and sections, Reserves/Resources should be updated. Accordingly, the development and production planning should be revised.

**General:**

1. In the cover page, the Progressive Mine Closure Plan submitted under Rule 23 of MCDR, 2017 should be furnished. The mine details like mine code and IBM Registration No. also be furnished.
2. As per the Lease deed submitted, the lease last executed was valid up to 26.9.2028, whereas the lease is valid up to 26.9.2058 as per MMDR Amendment Act 2015. Please clarify whether the State Government of AP has issued any order or any correspondence for the extension of the lease period under Section 8A(5) of MMDR Amendment Act 2015. If so a letter issued by the State Government intending to extend the lease period consequent to amendment in MMDR, Act 2015 should be enclosed.
3. The House No. given in address of the lessee furnished in the document differs with that of the Aadhar Card. Please give the correct House Number.
4. No information is furnished with regards to other leases if any held by the lessee.
5. In para 3.3, the review of Exploration, Development and Production, status of violations pointed out by IBM should be given up to the lapsed period i.e., up to 2017-18. In review chapter, the years should be mentioned as financial years instead of 1<sup>st</sup> Year, 2<sup>nd</sup> year etc. considering first year from the date of execution.
6. In para 3.4, it is stated that no violations were pointed out by the IBM during the mining plan period. However, it is found that violation letters were issued for various Rules on 24.9.2012, 4.10.2012 and 23.12.2015 by IBM .
7. In Para 3.5, it is stated that no suspension /closure/prohibitory orders were issued by any government agency under any rule or court of Law. However, it is found that order of suspension of mining operations under Rule13(2) of MCDR,1988 was issued by this office vide letter No. AP/KNL/Lst-182/Hyd dated 15.2.2013.

**PART-A**

8. Para 1.0 e) (iii) (Details of sample analysis--): It is stated that the samples are collected from the old working pits and analysed in NABL and sample locations are marked in Geological Plan. However, no such marking was found in the Geological plan, hence the same can not be verified in the field. It is advised to collect meter wise face sample from each pit and analyse in NAB Laboratory and to submit the analysis report to this office within a week time.

9. Para 1.0 h) (Geological Sections--) Two DTH holes may be drilled up to a depth of 30 m each in between old pit 1 & 3 and 3 & 4 on the section lines C-C' and E-E' to prove the depth persistence and based on the drill hole data, the reserves may be reassessed. Photographs and video while doing exploration should be submitted within a period of one week. Geological sections are drawn without proving depth persistence. The sectional influence considered for all the sections is incorrect. The same should be considered as per the exploration data carried out recently and the sections may be redrawn.
10. Para 1.0 i) 5 proposed core bore holes are not sufficient to convert the entire area into G1 scale of exploration. In addition to the 5 bore holes, two more core bore holes may be proposed to explore the total mineralized area into G1 scale. In the field it is observed that there are some limestone outcrops. Accordingly, the same should be demarcated in Geological Plan.
11. Para 1.0 j) (Reserves and Resources----) Category of the deposit as per ME & MC Rules, 2015 has not been furnished. The Reserves/ Resources are not estimated as per ME & MC Rules, 2015. In the absence of meter wise face sample analysis and grade wise exploratory data, the justification given for G1 scale of exploration is not correct. It is stated that the bulk density is considered as 2.6t/cu.m but while calculating the reserves, the bulk density is considered as 2.5 t/cu.m. Please correct it.
12. Para 1 k) (Detailed calculation of Reserves-----): The figures given in Reserve Estimation table 13 and 14 are incorrect. Please give the correct figures. The actual grade of the deposit be furnished against the reserve/resources in the UNFC Table instead of referring table 11, where the grade is not furnished. The cut off grade is given as Cao-35% in table 12 and the same is furnished as 40% under the head cut off grade in page no.18. In para 5.0 (Use of Mineral and Mineral Reject) the buyer's specification is given as Cao-40 to 54%. The Limestone having Cao 35% to 40% should be considered as Sub grade or Mineral Reject and the same should be estimated.
13. In the light of the above comments, the total mineral Reserves/Resources should be reassessed with grade and categorized as per ME & MC Rules, 2015.
14. Para 2 A a) Brief description of the existing method of mining---) : Development and Production planning may be revised after carrying out exploration and reassessment of reserves. Development and Production planning should be given in tabular form containing location, length, breadth and depth( MRL from –to) Accordingly plans and sections may be redrawn.
15. UPL marked should be restricted to G1/G2 level exploration area only.
16. Para 2 b) (year wise tentative excavation----) : The location earmarked for the waste dump may be proved as barren before dumping the waste.
17. In table No.24 ( Year wise proposed production and development details), the bulk density is considered as 2.6, whereas while calculating the reserves and resources, the same is considered as 2.5. Please make the corrections wherever it is applicable.
18. The Bank Guarantee @ Rs. 2,00,000/- per hectare for the area put to use as given in the financial assurance table needs to be submitted along with final copies..

**Plates:**

**Plate1 (Key Plan):** Name of the places connected by railway line and roads going out of the places should be shown. Extremities of the coordinates of the ML area be marked.

**Plate-2 ( Lease sketch) :** Lease sketch is missing in both the copies of the draft Review of Mining Plan. Lease sketch duly marked with the GPS Co-ordinates and authenticated by the State Government need to be submitted.

**Plate-4 (Geological Plan):** Strike and dip not marked on the Geological Plan. Sample location should also be marked.

**Plate-5 (Geological Cross sections) :** Geological cross sections may be redrawn after carrying out the exploration.

**Plate- 6A to 6E, 7, 8,11,12 ( Production and Development plan, Working Sections, Conceptual Plan & Sections, Reclamation Plan, Financial Assurance Plan):** These Plans be modified as per the Plate-4 & 5.



GOVERNMENT OF INDIA  
MINISTRY OF MINES  
INDIAN BUREAU OF MINES

Office of the Regional Controller of Mines

No. AP/KNL/MP/Lst -127/Hyd

Room No.603, 6th Floor,  
CGO Towers,Kavadiguda,  
Secunderabad.-50008

Date: 02.12.2018.

To  
Sri. S.Subose,  
S/O.Srungarapu Venkataramanaiah,  
H.No.9-101-1,Kothapeta,  
Dhone,Kurnool District,  
Andhra Pradesh-518222

Sub: Submission of Review of Mining Plan in respect of Malkapuram Limestone & Dolomite Mine of Sri S.Subose over an extent of 4.213 Ha. in Survey Nos.709/2 &705(P) of Malkapuram Village, Dhone Mandal, Kurnool dist., A.P. submitted under Rule 17(2) of MCR, 2016.

Ref: Your letter no. Nil, dated.08.12.2017.

Sir,

With reference to your letter cited above on the subject, the site inspection was carried out on 22.12.2017 by Smt. Ch.Suseela, AMG accompanied by Shri K.Prabhakara Reddy, Qualified person the draft Review of Mining Plan has since been examined and found certain deficiencies as given in Annexure. The same scrutiny comments have already been forwarded on e mail id of your Qualified Person as submitted in the document. [subose.srungarapu@gmail.com](mailto:subose.srungarapu@gmail.com) and [sums.hpt@gmail.com](mailto:sums.hpt@gmail.com)

02. You are advised to attend the deficiencies as per the annexure and resubmit the document, complete in all respects, in three bound copies along with soft copy in the form of CD (2Nos.) within 15 days from the date of issue of this letter. In this regard you are also advised s to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities @ Rs.Three lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs.Ten lakhs and @ Rs.Two Lakhs/hectare for category 'B' mines provided that the minimum amount shall be Rs.Five lakhs as per the provision of Rule 27(1) of MCDR, 2017 at the time of submission of final copies of the document within 15 (fifteen) days from the date of issue of this letter, failing which the document will be disposed without giving any further opportunity.

03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

Yours faithfully,

Sd/-

(Pankaj Kulshrestha)  
Controller of Mines

Copy to Shri K.Prabhakara Reddy, Qualified person for information & necessary action.

Sd/

Encl:a/a

(Pankaj Kulshrestha)  
Controller of Mines

मूल पति पर नही  
खान नियंत्रक (द), भारतीय खान ब्यूरो, बेंगलुरु।

Sd/

(पंकज कुलश्रेष्ठ)  
खान नियंत्रक