



भारत सरकार/Government of India
खान मंत्रालय/Ministry of Mines
भारतीय खान ब्यूरो/Indian Bureau of Mines
हैदराबाद क्षेत्रीय कार्यालय/Hyderabad Regional Office



No. AP/ANP/MP/Lst-58/Hyd.

Room No.603,
6th Floor,CGO Towers,
Kavadiguda,Secunderabad.-50008
Date: 07.11.2017

To

Dr.Anand Reddy,Nominated Owner,
Sagar Cements Ltd.,
Road No.10,Plot No.111,
Jubilee Hills,
Hyderabad-500 033
Telangana State.

Sub: Submission of Modified Mining Plan in respect of Gudipadu Limestone Mine of M/s Sagar Cements ® Ltd., over an extent of 454.59 ha. Situated in Gudipadu Village, Yadiki Mandal, Ananthapur dist., A.P. submitted under Rule 17(3) of MCDR, 2016.

Ref: Your letter no. BMM/M.I/F.119 dated 23.10.2017.

Sir,

01. With reference to your letter cited above on the subject, the scrutiny of the draft Modified 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 you and your Qualified Person as submitted in the document. e mail id. is info@sagarcements.in and mdnayeem@sagarcements.in

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.). In this regard you are directed to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities @ RsThree lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs.Ten 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,

(Manish Mandiratta)
Dy. Controller of Mines
For Regional Controller of Mines

Copy to : Shri Md.Nayeem, Qualified Persons

(Manish Mandiratta)
Dy. Controller of Mines
For Regional Controller of Mines

Copy to :
COM(SZ),IBM,Bangalore

(Manish Mandiratta)
Dy. Controller of Mines
For Regional Controller of Mines

Scrutiny Comments on the Modification of Mining Plan submitted in respect of Gudipadu Limestone Mine over an area of 459.59 hectare in village- Gudipadu, Mandal- Yadiki, District- Anantpur, Andhra Pradesh.

The submission that 30 acres excess land has been identified and shown in the lease sketch is not acceptable without the State Govt Order in this regard and proper documentation. Hence the state govt order in this regard be submitted. The sketch should be submitted as per boundary pillar co-ordinates certified by state govt.

1) Preamble

- a) The installed cement plant capacity and limestone requirement from the mine has not been furnished. The details of cement plant environmental clearance (EC) capacity and mines EC capacity has not been furnished and details of CFE and CFO should be furnished.
- b) No details have been furnished regarding the execution of transfer of lease deed.
- c) Name of the mine should not be changed.
- d) In the absence of state govt order regarding transfer of the lease in favour of M/s Sagar Cement® Ltd, the name of the lessee should be mentioned as M/s BMM Cement Limited.

2) General and Review

- a) The production quantity of 2016-17 should be mentioned as on 30.09.2017. Plantation figure in respect of 2015-16 is not furnished correctly. Further Environmental monitoring proposed and carried out with average quality of environmental parameters should be furnished in tabular form year wise.
- b) Sub grade generation was not anticipated; therefore generation of sub grade should be justified and the quantity and quality of sub grade produced year wise should be furnished.
- c) Status of compliance of violation has not been furnished properly.
- d) Details of the state wise leases held by the Lessee have not been furnished.
- e) Reason furnished for modification is not justified by the submission on page 10 and 16.
- f) As the BHs analysis has been carried out for CaO%, SiO₂% and other parameters, so the cut off grade of limestone and user industry requirement should be furnished in CaO%, SiO₂% instead of only TCO₃.
- g) All tables should be numbered and Annexure no has not been submitted correctly.
- h) As per rule 34 of MCDR-1988, –
 - (1) All digitally prepared plans, sections and print copies thereof kept at the mine shall be suitably indexed.
 - (2) Every plan, section or part thereof prepared under these rules shall carry thereon a certificate for its correctness and shall be signed by the mining engineer with date: Provided that the geological plans and sections shall be certified and signed by the geologist employed under rule 55.
 - (3) Every copy of a plan and section or part thereof submitted or maintained under these rules shall bear a reference to the original plan or section from which it was copied and shall be certified thereon by the holder of the mining lease to be a true copy of the original plan or section.

3) Geology and Exploration

- a) The state govt approved lease sketch is illegible. Thus original of the same should be shown for verification. All the plans are not prepared based on lease sketch approved by state govt.
- b) Date of survey along with signature of the survey who has carried out the survey has not been given in the surface plan.

- c) In the earlier approved mining plan the plans were prepared in assumed co-ordinates. But this time the plans have been prepared in UTM co-ordinates. The method adopted for linking the assumed co-ordinates to national grid (UTM) along with the permanent structures (common GCP points) and bench mark details like co-ordinates and level in mRL have not been furnished. In case the methodology is not established the plan should be prepared as per the local co-ordinates as approved in the last approval.
- d) The borehole number with series, collar RL, year of drilling, co-ordinates, drilled depth has not been furnished. Further the details of working pits like co-ordinates, no of benches, dimension of pits has not been furnished.
- e) The category of the deposit as per MEMC Rules-2015 has not been justified and mentioned accordingly. Further parameters considered for reserves/resources estimation has not been furnished.
- f) The bore holes drilled earlier which were not traceable in the field should be deleted from the text and plans and the total meterage should be corrected accordingly.
- g) Exploratory operation is not completed in respect of 40 nos of bore holes as analysis of 40 nos of bore holes is not done. So the reserves/resources should be calculated without considering these bore holes. Details of BHs for which analysis is still pending should be furnished in tabular form and demarcated in the geological plan with different colour other than the explored bore hole.
- h) 10% check sample of each core bore hole have not been analyzed from NABL accredited laboratory.
- i) Ultimate pit limit depth has not been analysed and furnished. The Ultimate Pit slope should be 45 degree or less.
- j) Temperature and rain fall related data sources have not been mentioned.
- k) 50m safety zone surrounding the Kunta has not been marked on plan and on either side of the nala near boundary pillar no-39 in North part of the lease, should be marked on the plan.
- l) Area explored under different level of explorations has not been furnished. Further the grade of limestone should be furnished for CaO% & SiO₂%.
- m) Reserves / resources wrt threshold value and cut off value of the industry have not been estimated.
- n) In the feasibility axis costing and economic viability data, details of environmental clearance, consent for establishment and consent for operation, crushing plant capacity have not been furnished.
- o) Section 9-9', 11-11', 20-20' have not been projected correctly. Further while estimation of reserves/resources barrier zone should be considered and the sectional influence should be restricted when there is excluded area and water body safety zone falling on or between two section lines.
- p) In the reserves/resource table the weighted average grade of ore should be furnished for CaO% and SiO₂% at least.
- q) The UNFC category has not been furnished correctly in the geological sections. The ultimate pit limit depth has not been marked in the geological sections.
- r) Reserves / resources of different type of limestone occurring in the mining lease has not been furnished with weighted average grade.

In light of the above comments the reserves /resources are not estimated correctly. Thus in light of the above the total mineral resources, reserves need to be assessed along with grade and categorized correctly as per MEMC rules-2015.

4) Mining

- a) As per MCDR-2017 top soil and mineral bench should be kept sufficiently away from proposed mining area to minimize dilution. It has been noted from the lithologs that top bench containing soil and clay in interstices. In such cases proposal be given for segregation of limestone from soil and clay by putting Grizzly thus evading sub grade generation. The proposal for simultaneous blending of sub grade limestone be given if possible else in case of Sub grade generation. The proposal be given for keeping a record of generation and utilization of sub-grade.
- b) Bench height proposed for mining has been furnished in range. It should be proposed as per the permission obtained from Govt body.
- c) Year wise sump proposal along with co-ordinates, bench no, dimension, capacity has not been furnished.
- d) The bench wise weighted average grade of proposed mining block for each year needs to be furnished and the mechanism for the grade control for optimum utilization of mineral along with blending techniques needs to be furnished. Bench parameters needs to be mentioned in the text.
- e) There is no generation of OB/SB/IB in the proposed plan period. The stripping ratio are not mentioned correctly and should be mentioned as nil. Top soil can not be considered for calculation of stripping ratio.
- f) Soil handling should not be included in the production target.
- g) In the blasting parameters calculation of powder factor has not been given. Further the details of decking, bottom charge and column charge. Permission nos with date pertaining to deep hole drilling and blasting, ANFO mixing, Explosive Magazine should be furnished.
- h) Year wise Development and production plan and year wise working sections are not matching. Further in the year wise development and production plan the colours code of the year blocks to be developed and as shown in index is not matching. At entry the ramp width should be more and level in mRL should be mentioned in the ramp. Provision for in and out should be from each bench should be mentioned. Ramp to 4th bench is not maintained at 1:20. Proposed production of 2017-18 is confusing as to whether it is in total for the year or for the balance period of 2017-18.
- i) In the lay out of mine working amount of advance to be made length wise, width wise, height, co-ordinates, from –to level(in mRL), Volume has not been furnished.
- j) The conceptual plan is not submitted in full as part of the lease area is not in the submitted plan and further the conceptual mining chapter has not been dealt properly. The proposal of water reservoir is not justified and correct. Mining in 4 blocks at conceptual stage is not allowed as the reserves/resources will be blocked at pit slopes between two consecutive blocks. Thus the mining pit should be developed by only one pit at conceptual stage. Fencing should be proposed surrounding the excluded area falling within the ML boundary and 45 degree pit slope should be maintained from the area which is excluded from the lease but falling within the lease boundary. The production details for the modification period have not been furnished correctly. Area for mining in the Post mining land use pattern table is shown in excess. Environmental monitoring has not been proposed. The block year wise reserve position, sub-grade generation and its disposal, reclamation, rehabilitation, afforestation programme has not been discussed and shown in plan. Further the conceptual section has also not been prepared and enclosed.

Thus the conceptual chapter should be discussed again in text and shown in plan. Conceptual status of mine at the end of lease period be discussed for exploration, waste generation, pit development, land use pattern, sub grade / mineral reject generation, dumping of waste, stacking of SG and mineral rejects, afforestation, reclamation and rehabilitation be discussed correctly. The same should match with submission in plates.

5) Mine Drainage

- a) Water table related information source should be mentioned. Max level of working should not be mentioned in range.
- b) Year wise catch drain development proposal with details like length, location, has not been discussed and shown in year wise production and development plan.
- c) Rain fall related information source has not been mentioned.
- d) Quantity of water to flow through the lease has not been discussed.
- e) Proposal should be given for studying the HFL on yearly basis for establishing the HFL.

6) Stacking of Mineral reject/sub-grade material and disposal of waste

- a) There is ambiguity regarding generation of sub grade as submitted in chapter 4.2 and 4.3.
- b) Year wise proposal for generation of sub grade and utilization of sub grade for blending should be furnished with quantity and grade.
- c) The site of temporary dumping of sub grade be identified as per MCDR and submitted. Dumping pattern should be proposed.
- d) Details of existing sub grade stock like location co-ordinates, dimensions, quantity and grade should be furnished.
- e) There is ambiguity regarding generation of sub grade as observed from chapter 4.2 and 4.3.

7) Use of Mineral and Mineral rejects

- a) The chemical grade requirement of end use industry should be in average instead of range.
- b) Process adopted to upgrade the ROM to suit user requirement is not mentioned properly as crushing has not been mentioned.

8) Others- OMS output has not been submitted.

9) Progressive Mine Closure Plan

- a) The financial assurance plan has not been printed properly and be submitted if full.
- b) Gist of last quarter environmental monitoring has not been furnished. Environmental monitoring reports should be furnished on the Environmental monitoring agency's letter head.
- c) The year wise proposal for development of catch drain, retaining bund for top-soil, siltation pit, and green belt development has not been discussed and shown in the reclamation plan.
- d) The area of excavation as per the earlier approved mining plan is 18.65 Ha but in the current modification it is 14.00 Ha. The deviation needs to be clarified.
- e) Afforestation should be proposed as per the environmental clearance/Consent for operation.

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