

Scrutiny comments on examination of Modification of Mining Plan in respect of Sangankalam Limestone mine of M/s India Cement Limited over an extent of 112.8 Ha. located in Sangankalam Village, Tandur Mandal Vikarabad District of Telangana State submitted under Rule 17(3) of MCR, 2016.

TEXT:

1. The document should have been prepared as per the prescribed format of 'IBM manual for appraisal of mining plan 2014'.
2. The document should have been submitted as 'Review of Mining plan' under rule 17(2) of MCR,2016 instead of modification of Mining plan as extent of lease is yet to be received by the State Government.
3. The document should be prepared by qualified person as per the provision of rule 15(1) of MCR, 2016, accordingly details of experience should be furnished with supporting document.
4. As per the document submitted the lease on last occasion was executed was having validity up to 02.09.2018, please clarify whether the State Government of Telangana 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.
5. Mining operations have been carried out within 7.5 meters of buffer zone of the lease boundary on southern side, which is also violation of lease deed conditions, permission from competent authority for working within 7.5 meters of lease boundary should be submitted.
6. In cover page, Sy. no.s of the lease area, village, mandal, Name of the qualified persons with address etc. should be submitted. Further the validity period of lease should be submitted as per the document available only, there is no deemed extension of lease period is considered unless any formal correspondence from state government.
7. Consent letter, undertaking, certificates submitted by the authorized person and qualified persons should be furnished on company's original letter head duly dated and signed.
8. Copy of the photo identity proof of the nominated owner submitted is not legible.
9. Name of the document, lease area has been furnished different in different para in text part of the document, like certificates, which should be corrected.
10. Presence of ordinary clay is observed in the field, status of the same during exploitation should be furnished.
11. Experience details of the qualified person furnished is not as per statute, which should be furnished in page no.6 with supporting documents.
12. New MC&D Rules, 2017 have been notified in February 2017 whereas in text part, certificate furnished by qualified person observance of MC&D Rules, 1988 is furnished. The qualified person should be updated and prepare the document in compliance of the new MCDR, 2017.
13. Capacity of Cement plant should commensurate to the approved quantity of mines feeding to it. Capacity of the instant lease should be computed based on the approved quantity of leases linked with capacity of cement plant. Further, technical report for conversion factor of limestone to Cement considered should be carried out by institute of National repute

and submitted. Based on the above study, production proposal of limestone of the instant lease should be made and furnish in introduction chapter.

14. In Introductory chapter, it has to clearly spell out about the mining history, company details, its captive plants, future plans if any may be furnished.
15. Specify the various statutory clearances like, Environment clearance (EC), Consent for operation (CTO), Consent for Establish (CFE), Surface right area held by the lessee etc. pertaining to the instant lease should be furnished with documentary evidence.
16. In para 2.c., Geo co-ordinates of all lease boundary pillars with ground control points authenticated by state government should be furnished.

#### REVIEW OF APPROVED PROPOSALS

17. Review of PMCP should also be furnished in tabular form in to-to as per approved proposals, like monitoring status, land use detail, reclamation etc.
18. Status of compliance of violation pointed out by IBM should have been furnished as 'complied' or 'not' with supporting document.
19. Color photographs of core bore holes drilled, quarry working, core logs, lease boundary pillars, mining and allied activities etc. should be submitted.

#### GEOLOGY

20. Occurrence of Clay is reported, but reserves/ resources of the same have not been estimated, based on past experience/ exploration.
21. No bore holes have drilled up to base of the ore body, in this regard few more bore holes should be proposed to drill up to base of ore body accordingly year wise exploration proposal should be furnished.
22. Details in tabular form as per the requirement of format in para '1.e.(ii)' should be furnished.
23. Bore holes drilled in the lease area so far should have been furnished in tabular form incorporating, Year, Bore hole no., Location, Collar RL, Depth, Remarks etc. should be submitted.
24. Location of bore holes, grid lines etc. should be furnished in 'WGS 84' co-ordinates for easy reference in text as well as in relevant plans and sections.
25. Expenditure incurred for exploration carried out during review period should be furnished with supporting document, Document submitted in Annexure 12 recheck and submit pertaining to the instant lease.
26. Reserves should have been submitted as on date with grade of ore, cut off grade, threshold value and should have been arrived after deduction of ore depleted during review period. Further additional reserves estimated if any, should have been considered to arrive the present reserves as on date, the same should be submitted in chronological order for clarity.
27. In basis of reserve estimation, bore holes drilled in 200 x 200 grid pattern is stated to be considered under G1 & G3, which is contradictory. Details of exploration carried out should be furnished in the tabular form as below

SL no.	Area explored under				Total lease area
	G1 level (ha)	G2 level (ha)	G3 level (ha)	Unexplored area (ha)	

28. Basis of reserve estimation should be furnished in detail as per UNFC and ME & MC Rules 2015; aspects like UPL considered based on stripping ratio at economic depth, grade of ore etc. has not been clarified, without

consideration the above aspects reserve have been estimated, which is impractical and cannot be acceptable.

29. UNFC code, UPL, bore hole etc. should be submitted in the Geological plan, geological sections, year wise development plans and sections, Conceptual plan and sections.
30. There exist litho units of Ordinary clay, variegated limestone, argillaceous limestone, grey to dark gray limestone, green limestone, purple limestone, but the chemical analysis of the above should be furnished in the text and depicted in geological plan & sections for clarity.
31. Details of Topographic survey, Geological mapping, surface sampling carried out in the lease area should be discussed in the text part of the document.
32. It is observed that meter analysis of bore hole has not been carried out. In this regard meter wise analysis report of all the bore holes drilled so far and 10% of the samples from NABL accredited lab should be furnished else commitment to submit the same in time bound manner as required under the provision of rule 12(5) of MCDR, 2017, then only the entire process of exploration will be considered as complete and the data can be used for estimation purpose.
33. Justification of UNFC codes for reserve/ resources has not been carried out as per guidelines and MEMC Rules 2015, like in economic viability though the limestone is not salable and is used or captive consumption for manufacturing of Cement but viability of the same has not been discussed, which needs complete re-casting.
34. Weighted average of the resources/ reserves should be computed and submitted.
35. Limestone is being used for captive consumption and not for sale, the economic viability should have been considered in feasibility report up to manufacturing of cement and not the production of limestone.
36. All the computation made for assessment of resources/ reserves should be submitted in the text part of the document only instead of submission as annexure.

#### Mining

37. Exploitation proposal should be submitted up to 03.09.2018 only.
38. It was observed that excavation has been proposed in haphazard manner instead proposal should have been furnished from one end of the lease to other end after complete exploitation for systematic, safe scientific and mineral conservation point of view, accordingly proposal should be suitable modified and submitted.
39. Exploitation of fresh area has been proposed, but generation of top soil, its stack and usage etc. has not been furnished and depicted in relevant plan and sections
40. All the computation made for year wise exploitation proposal should be furnished in text part only instead of annexure.
41. Contradictory statements have been furnished in the document, for example proven reserves estimated in page no.25 is stated to be 27.72 million tones but in page no.41 the reserves were furnished as 66.31 million tones, which needs to be corrected.
42. Limestone termed as 'Shahabad Limestone' is furnished in the mining chapter but no such detail is stated in the 'Geology' chapter, which needs clarification.

#### Conceptual plan

43. Details furnished in the conceptual plan is sketchy and has not prepared as per the guidelines. Life of the mine has not been determined, UPL has to be determined based on exploration carried out so far and economic viability. Status of reclamation and rehabilitation at the end of this plan period as well as at the end of life of the mine has not been taken in to consideration. Which needs complete re-casting.
44. Exploitation proposal should have been submitted from one end of the lease to other end without leaving any mineralized area for mineral conservation, systematic mining point of view so that reclamation and rehabilitation can be carried out at an early stage.

#### STOCKING OF MINERAL REJECT/DISPOSAL OF Waste

45. Details of stack/ dump of waste/ top soil exist in the lease area should be furnished.

#### Drainage

46. Study of ground water table should be carried out from an institute of national repute and report should be submitted within the six months, a commitment should be made in this regard.
47. Refer, page no.44, it is stated that maximum depth of working is 426 MRL, however excavation has already carried out up to 422 MRL, which needs clarification.

#### Processing of ROM

48. Schematic diagram of flow sheet/ material balance chart should be submitted for easy reference.
49. It is observed that about 3-6% of feed in the form of fines is being generated during crushing and screening process, details of the same should be furnished.

#### PMCP

50. Environment baseline information should be furnished as EC document.
51. Monitoring stations in Core / buffer zone should be furnished.
52. Top soil generation is proposed, but its utilization with location details is not furnished.
53. Care and maintenance during temporary discontinuous of mining operation should be submitted in detail.
54. Area put to use should be recalculated as 40.15 ha has already degraded as reported in the annual returns submitted for the year 2016-17 details are as below,, which needs to be corrected accordingly financial assurance should be re-submitted,

Particulars (Ha)	As per annual return 2016-17	As per document
<b>Covered under current (O/C) Workings</b>	36.70	32.4
<b>Occupied by plant, buildings, residential, welfare buildings &amp; roads</b>	0.4	0.4
<b>Other Purpose (TOP SOIL )</b>	3.05	1.29

## Plans and sections

55. All the plans and sections should be submitted as per the provision of rules 31, 32, 33 & 34 of MCDR, 2017.
56. Standard color code should be used in respect of litho units for easy reference.
57. Every copy of a plan and section or part thereof submitted or maintained under these rules (34) 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.
58. Copy of original lease map during execution of lease should be submitted.
59. Geo-co ordinates of lease boundary pillars map authenticated by state government authority should be submitted. Original map should be furnished for verification.
60. Co-ordinates of grid lines should be submitted in 'WGS 84' in addition to local co-ordinates in all the plans and sections, for easy reference.
61. Key plan should be submitted as per the provision of rule 32(5)(a) of MCDR, 2017 and submitted on survey of India topo sheet only.
62. Surface plan should be duly dated and signed by mines manager, surveyor with certificate no., mining Engineer, Geologist in relevant plans and sections as per the statute.
63. Surface plan, Lease boundary of the lease should be depicted properly (in bold line) for easy reference, co-ordinates of ground control points are furnished but not depicted in plan. Surface features are not properly depicted, there create confusion to identify the features.
64. Geological plan and sections: G1, G2, G3 level of exploration should be depicted in different colors as per MEMC rules 2015.
65. Lithology details furnished in legend and that depicted in sections is not matching
66. Year wise development plans and sections, Conceptual plan and section should be submitted in 1 : 2000 scale.
67. Section lines are not legible in Surface Geological plan, Few more sections should be drawn for computation of reserves and represent the position of workings.
68. UPL has not been depicted in relevant plans and sections.
69. Year wise development plans and section, Geological sections should be considered as base plan and considering the same no. of sections as that in geological section so that the entire exploitation area can be covered for presenting, for easy understanding.
70. Conceptual plan and section, no. of section should be same as Geological sections and submitted for easy understanding.
71. Environment Plan, The surface features within 200 meters from lease boundary has to be furnished in detail, it is observed that only part details are furnished, which needs recheck and submit. The plan should be prepared and submitted as per the provision of rule 32(5)(b) of MCdr, 2017.
72. Reclamation plan: There exist top soil dump in the lease, its utilization has not been dealt in the text and depicted in plan.

73. Financial assurance table furnished is sketchy all the particulars in the FA table has not been depicted, which needs to be prepared afresh and submitted.

74. In view of the above comments, relevant para, plans and section should be suitably modified and submitted.

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GOVERNMENT OF INDIA  
MINISTRY OF MINES  
INDIAN BUREAU OF MINES  
Office of the Regional Controller of Mines



No. AP/RR/MP/Lst-11/Hyd

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

Date: 28.12.2017

To

V.Manickam,Nominated Owner,  
M/s. India Cements Limited,  
"White House", #6-3-1192/1/1,  
Block IIIB, III Floor,  
Kundanbagh, Begumpet,  
Hyderabad – 500 016.

Sub: Submission of Modified Mining in respect of Sangamkalam Limestone Mine (Lease-I) over an extent of 112.80 Hc. in Sangamkalam Village, Tandur Mandal, Vikarabad District (Earlier Ranga Reddy ), T.S. submitted under Rule 17(3) of MCR 2016.

Ref: Your letter no. ICL/Mines-IBM-MMP/2017-18/4129-31, dated 09.12.2017.

Sir,

With reference to your letter cited above on the subject, the scrutiny of the draft Review of Mining Plan has since been examined based on the previous inspection carried out by Sri Ibrahim Sharief, Sr.ACOM of this office on 30.10.2017 and found certain deficiencies in the form of scrutiny comments 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 . [ganeshrao.ts@indiacements.co.in](mailto:ganeshrao.ts@indiacements.co.in) & [mkp\\_mines@indiacements.co.in](mailto:mkp_mines@indiacements.co.in).

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 @ 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 whiforwarding modified document

Yours faithfully,

(Manish Mandiratta)  
Deputy Controller of Mines

Copy to Shri V.Raghavendra and Shri T.S.Ganesh Rao, Qualified persons. for information & necessary action.

Encl:a/a

(Manish Mandiratta)  
Deputy Controller of Mines

मूल प्रति पर नहीं –  
खान नियंत्रक (द), भारतीय खान ब्यूरो, बेंगलुरु।

(मनीष मैदीरत्ता)  
उप खान नियंत्रक