## Scrutiny comments on Sagar Cements Limestone Mine-I over an extent of 326.58 ha in Pedaveedu Village, Mattampally Mandal, Survapet district, Telangana State of M/s Sagar Cements Limited

- 1. In preamble it was mentioned that as per the MMDR Amendment Act,2015, period of lease was extended up to August,2034.However, copy of execution proceedings of the grant order G.O.Ms.No.75 dated 26.08.2017 are not enclosed. If the lease period is extended, modification in the mining plan be submitted under rule 17(3) of MCR,2016.
- 2. In Para 1.0(a) i.e. name and address of the lessee, details be provided as per the format given in the manual.
- 3. In Para 3.0. i.e. details of approved mining plan/scheme of mining, details of all earlier approvals to be mentioned.
- 4. In para 3.14 under details of violations issued, mention to made about the violation issued dated 06.11.2017 issued based on the MCDR inspection carried out on 28.10.2017 be furnished in tabular form and copies enclosed as annexures.
- 5. On page 29 in table 1.6 the grid interval was mentioned as 200x100m,whereas in the text it is mentioned as 100x100m. This needs to be clarified and modified at all relevant places.
- 6. It is seen from the plate-IV i.e. Surface Geological Plan that two proposed Core Bore Holes(PBH-1 & PBH-6) are planned in the already explored area marked as G1. Whereas in the G3 area on the Eastern side of the lease area has been left out.
- 7. Copy of Form-J i.e. notice of commencement of drilling for exploration work undertaken during the year 2017-18 to be enclosed as annexure.
- 8. The lithologs given as annexure from 26-30, signature of chemist is missing.
- 9. It is seen in chapter 2.0 i.e. Mining, under proposed production proposals it noted that the proposal given in the earlier plan period was1,12,83,138 tonnes and the proposals for the ensuing plan period is 1,13,66,000 tonnes. However, the actual achievement during the last plan period was 70,19,189 tonnes. The justification for increase in production for the proposed plan period to be provided.
- 10. A note on the capacity of the plant vis-à-vis the production and reserve/resource for feeding the plant from both the mining leases to be provided. So as to enable proper planning and excavation of the mineral. The proposals should be in accordance with the installed capacity of the plant.
- 11. The pit position anticipated as on 31/3/2018 in tune with the proposals approved for 2017-18 be marked on all relevant plates.
- 12. In page no.47 at table no. 2.3 the ROM figures mentioned in the table are not conforming to those given in the subsequent paras wherein year wise proposals are made. This needs to be rectified.
- 13. In the same table i.e. 2.3 the figures given for Topsoil generation for 2018-19 and 2019-20 i.e. 23,000 Cu.m and 16,200 Cu.m respectively are not matching with those figures given under proposals on page no. 48. This needs to be corrected and same shall be reflected at all relevant chapters. Thye same should be corrected in the Annexure-31 i.e. feasibility report.
- 14. At page no.60-61 in post mining land use pattern, it was mentioned that no reclamation by way of backfilling is possible. However, as per the proposals made in the document it was stated that 1.70 ha shall be reclaimed during 2019-20 and 2020-21 by way of using 2,10,000 tonnes of waste generated.

- 15. A copy of the Hydrogeological report to be enclosed along with final copies.
- 16. At Para 8.6 i.e. Financial Assurance: The necessary financial assurance amount i.e. Rs.6,11,88,300/need to be submitted aong with final copies and the FA should be valid till 31.3.2023.It is mentiuoned that earlier submitted FA's are valid up to 31.3.2018 and a differential amount shall be submitted. Only a single FA along with necessary amount valid for the ensuing plan period to be submitted at the time of final copies.
- 17. At table 8.3.1 it was mentioned that 1800 saplings will be planted every year over and extent of 1 ha during the each year of the ensuing plan period. However, as per the annexure 4A i.e. MOEF clearance, it was mentioned that every year with a density of 2500 saplings per hectare need to planted. Accordingly the plantation proposals need to be revisited.
- 18. A copy of the permission letter obtained for using HEMM to enclosed as annexure.
- 19. Annexure 33A i.e. photos showing Environment and Land use pattern of Mining Lease area is missing. This needs to be enclosed.
- 20. In the Environment plan i.e. both Part-A & B, index should be given in both parts. Further few more points pertaining to Ambient Air Quality/Noise Quality/Soil Quality need to to marked at various strategic locations in core zone other than those already marked.
- 21. It is seen from the document that as per the Grant order the survey no. is 541,but in all plates/sections it is being shown as 541(P). This needs to be modified and survey numbers to be mentioned properly in all relevant plans/sections.
- 22. It is noted from the analysis of the lithologs that there is grade variation in the proposed development on Eastern and South Eastern part of the lease. As such bench wise slice plans need to be prepared for ascertaining grade variations looking into the aspect of mineral conservation.
- 23. In plate IV i.e. Surface Geological plan, two bore holes that is C/13/05 and C-02-05 are falling outside the lease area. As such cognizance of these two boreholes should not be taken for calculation of reserves/resources and accordingly reserve/resource estimations to be recasted.
- 24. In Plate IVA i.e. geological Cross sections, following deficiencies are observed which need to be rectified.
  - a. Section C-C' is not matching with the Surface Geological plan.
  - b. In section E-E' bore hole C/13/05 is shown inside mining lease, this needs to be rectified as per point mentioned above at S.No.22.Further, the section is not matching with Surface geological Plan.
  - c. In section I-I' resources (333) is marked whereas as per Surface Geological Plan there is no G3 area. This needs to be rectified.
  - d. Sections J-J' and N-N' are not matching with Surface Geological Plan





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

No. AP/NLG/MP/Lst-53/Hyd

Room No.603, 6th Floor, CGO Towers, Kavadiguda, Secunderabad.-500080. Date:

To Shri.S Sreekanth Reddy, Nominated Owner, M/s Sagar Cements Limited Road No. 10, Plot No. 111, Jubilee Hills, Hyderabad – 500 033

Sub: Submission of Review of Mining Plan in respect of Sagar Cements Limestone Mine of M/s Sagar Cement Limited over an extent of 326.58 Ha. located in Pedaveedu Village, Mattampally Mandal, Suryapet District of AP State submitted under Rule 17(2) of MCR, 2016.

Ref: Your letter no. SCL/M.I/F.07 dated 05-01-2018.

Sir,

With reference to your letter cited above on the subject, based on table scrutiny 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. <a href="mailto:mdnayeem@sagarcements.in">mdnayeem@sagarcements.in</a>

- O2. 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 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,

(Pankaj Kulshrestha) Controller of Mines

Copy to Shri Me. Nayeem, Qualified person for information & necessary action.

Encl:a/a

(Pankaj Kulshrestha) Controller of Mines

मूल पति पर नहीं खान नियंत्रक (द), भारतीय खान ब्यूरों, बेंगलुरू।

(पंकज कुलश्रेष्ठ) खान नियंत्रक