



भारत सरकार GOVERNMENT OF INDIA  
खान मंत्रालय MINISTRY OF MINES  
भारतीय खान ब्यूरो INDIAN BUREAU OF MINES  
क्षेत्रीय खान नियंत्रक के कार्यालय  
OFFICE OF THE REGIONAL CONTROLLER OF MINES



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No. RMP/A/53-ORI/BHU/2020-21

दिनांक / Date: 12.03.2021

To

Shri Biswanath Agrawala,  
Power of Attorney Holder,  
M/s R. V. Enterprisers Pvt. Ltd.  
Flat No-104, First Floor,  
Balaram Ananta Complex,  
Block-B, Damana Chhak,  
Bhubaneswar, Odisha-751016

Sub: Review of Mining Plan of Badakuchulu Limestone & Dolomite Mine over an area of 64.993 ha in Sundargarh district of Odisha of M/s R. V. Enterprisers Pvt. Ltd. submitted under Rule-17 of MCR, 2016.

Ref:- i) Your letter no. nil dated nil received on 01.03.2021.  
ii) This office letter of even no. dated 01.03.2021.  
iii) This office letter of even no. dated 01.03.2021 addressed to the Director of Mines, Govt. of Odisha, copy endorsed to you.

Sir,

This has reference to the letters cited above on the subject. The draft Review of Mining Plan along with Progressive Mine Closure Plan has been examined in this office based on site inspection carried out on 06.03.2021 by Shri Dayanand Upadhyay, Sr. Assistant Controller of Mines. The deficiencies observed are enclosed herewith as Annexure-I.

You are advised to carry out the necessary modifications in the draft Review of Mining Plan in the light of the contents vide Annexure-I and submit **three (3) firm bound and two (2) soft copies of the document text in CD in a single MS Word file (the drawing/plates should be submitted in Auto CAD compatible format and JPG format in resolution of 100x100 pixels on same USB Pendrive/Flashdrive)** with financial assurance under Rule 27 of MCDR' 2017 within 15 (fifteen) days from the date of issue of this letter for further necessary action. If the total page of annexures exceeds 50 (Fifty) then it should be submitted as separate volume. But reference of these annexures must appear in the Review of Mining Plan document. The plates are also to be submitted in separate volume.

The para-wise clarifications and the manner in which the deficiencies are attended should invariably be given while forwarding the modified copies of the Review of Mining Plan. It may be noted that no extension of time in this regard will be entertained and the Review of Mining Plan will be considered for rejection if not submitted within above due date. It may also be noted that if the deficiencies are not attended completely, the submission would be liable for rejection without further correspondence.

भवदीय / yours faithfully,

(HARKESH MEENA)

क्षेत्रीय खान नियंत्रक / Regional Controller of Mines

Copy for kind information and necessary action to:

1. Shri S. C. Nayak, Qualified Person, M/s Minesketch Consultants (P) Limited, Flat No-205, Bhagwan Tower, Cuttack Road, Bhubaneswar-751006.

(HARKESH MEENA)  
क्षेत्रीय खान नियंत्रक / Regional Controller of Mines

**Scrutiny comments on examination of Review of Mining Plan of Badakuchulu Limestone & dolomite Mine, over an area of 64.993 Ha of M/s R.V. Enterprises Pvt. Ltd in Sundargarh district of Odisha State.**

**GENERAL**

1. On cover page the phone no., fax no., and e-mail have not been furnished. In introduction chapter details of the lease along with execution of the lease deed reason of non-commencement of mining operation have not been furnished.
2. The mining lease is declares lapsed by State Govt. vide G.P. No. 12375/SM, dated 21/12/2015 therefore a brief review of present status of Mining lease with lapsing order and their revival are to be furnished with documentary evidence.
3. Page-4, Para (e), name of both the minerals i.e limestone and dolomite have not been furnished under the item “ Minerals which is the applicant/Lessee intends to mine”. Under para-3.5, the details of lapsing/suspension order has not been furnished.
4. Page-8, Latitude and longitude of all boundary pillars as furnished in the text are to be certified for its correctness by furnishing undertaking with signed by qualified person and surveyor.
5. Sequence of paragraph and its numbering as per IBM Manual Appraisal MP 2014 has not been covered in text. All the headings as mentioned in the IBM Manual Appraisal MP 2014 should be furnished in all chapters in the text.
6. Lessee is a company. Hence, all certificates, undertakings, consent letter etc. should be signed by the nominated owner only. Extract from the minutes of the Board of director meeting with list of Board of Directors, their phone no. address and declaration of nominated Owner to be furnished.
7. Annexure enclosed are not legible and not in chronicle order. All the annexure to be properly indexed/ numbered/ paged and signed by qualified person. All the certificates should bear dated signature.

**GEOLOGY:**

8. The litho-units indicating structural features have not been furnished correctly in text and geological plan. Existing surface features are also not correctly furnished. As discussed during field visit it should be corrected accordingly.
9. Page-13, Para-(d), name of prospecting/exploration agencies who involved earlier has not been described. The details information of the prospecting/exploration agencies should be furnished. Expenditure incurred in various prospecting operation has not been furnished.
10. Page-16, the complete lease area should be proposed to cover under exploration under G1 level upto end of mineralization as per provision of rule 12(4) of MCDR 2017. Page-17, the proposed bore holes have not been described with core/non-core drilling. All the drilled and proposed BH to be depicted on the Geological section along with mRL and its actual and proposed depth for better referencing. The details of the proposed boreholes have to be furnished in following tabular format.

Year	BH no.	Northing	Easting	Collar RL	Core/ RC/ DTH	Meterage	Inclination	Forest/ Diversified forest/non fores	Surface right/ non surface right	Purpose of bore holes

11. As per IBM Manual Appraisal MP 2014, details of samples analysis indicating type of sample (surface/sub-surface from pits/trenches/borehole etc) has not been described. The details of the sample analysis indicating type of sample should be given in tabulated format and nos. of sample analysis from NABL/Govt. lab out of total sample should be furnished along with annexure.



12. The Geological boundaries of exploration limit i.e. G1/G2/G3 etc. are not marked as per Minerals Evidence of Mineral Contents Rules 2015. Same is to be revised and area furnished on page no.-18 under different norms of exploration should be accordingly
13. Page 19, it is mentioned that the feasibility study report is enclosed vide annexure-1 along with financial analysis for economic viability of the deposit, however the reserve/resources estimated under G2 category. Therefore a pre-feasibility report should be submitted.
14. Para-(l), table is not furnished correctly, based on the level of exploration with reference to the threshold value of minerals declared by IBM as below:

Level of Exploration	Resources in million tons	Grade
G1 - Detailed exploration		
G2 - General Exploration		
G3 - Prospecting		
G4- Reconnaissance		

15. The cut off grade of limestone and dolomite as furnished at page no.-20 are not matched with cut off grade of limestone and dolomite as furnished at page no.-23. The cut off grade considered for cement grade limestone is on higher side. It should be re-checked and corrected accordingly.
16. Page-21, justification of UNFC as furnished is not properly discussed as per Minerals Evidence of Mineral Contents Rules 2015. The UNFC codes as furnished are incorrect.
17. Page-24, the reserve and resources as depicted in table is not as per the provision of MEMC Rules 2015. The reserve and resources as furnished are not justified with geological plan and sections. Page no.-23, the resources furnished under 211 category while in summary table of reserve and resources same resources is furnished under 222 category. The resources under 222 category is shown in geological sections. The resources furnished under 333 category is also not justified. The reserve and resources should be re-estimated considering the village road, power line etc as per rule and proper UNFC codes should be furnished.
18. As per guideline of "IBM manual on appraisal of Mining Plan 2014" at least 10% of total samples to be analysed in accordance to BIS and reports form NABL accredited/Government Laboratory.

#### **MINING:**

19. Page-28, existing method of mining has not been described in brief with date and reason of discontinuity of mining operation and present status of mining operation along with statutory clearances etc.
20. Justification of site selection, proposed for mining has not been furnished with respect to existence of mineralisation, advancement pit, targeted quantity and grade in view of scientific mining.
21. The insitu tentative excavation as furnished in tabular form is to be revised after re-estimating the reserve and resources as suggested in geology chapter considering the safety zone of the village road and power line passes through the lease area.
22. Page-31, the average grade of saleable ore and mineral reject is to be furnished. The bulk density considered for saleable and mineral reject should be depicted in bullet notes with supporting document. The cut off grade of limestone and dolomite is not correctly furnished.
23. The year wise calculation table of ROM production as furnished on page no-42 & 43 are not matched with the development plan and sections. The RL of the benches are also not matched.
24. Page-34, Para-e, layout of mine workings, layout of faces and site for disposal of overburden has not been described properly with height & width, haul road, no. of pits /block considered.
25. In conceptual mining plan, the life of mines has not been furnished correctly. Cumulative waste generation and backfilling and protective measures should be furnished properly. Restoration of safety zone, dead

dump and slope of the dump may describe properly. The quantity of Sub-grade/mineral reject to be generated during conceptual period and its future utilization and planning may be furnished.

26. In pursuant to the order dated 14.01.2020 passed by MoM, GoI, consequent up on the order dated 08.01.2020 of the Hon'ble Apex Court passed in W.P.(C) No. 114/2014, the lessee shall carryout "re-grassing in mining area after closure of mines". Accordingly it should be discussed during conceptual period

**STACKING OF MINERAL REJECT/SUB GRADE AND DISPOSAL OF WASTE:**

27. It should be ensured that the area proposed for dumping should be proved non mineralized. Therefore exploration proposal priorities to prove the non-mineralized area before the dumping of waste/mineral reject.

28. Details of proposed retaining wall, garland drain, settling tank etc. to be given year wise with their location. Location of sub-grade storage along with year to year development of the SG dumps to be given.

29. The proposal of dumping may be given in tabulate format as shown below. The year wise build up of dump should be described in details.

year	Waste to be dumped	Dump No	Location of Dumping (Grid)	Proposed area	Proposed dumping RL	No of terrace proposed	Individual terrace height	Slope of the terrace

**Use of Mineral and Mineral reject:**

30. The use of mineral and mineral reject has not been described correctly in terms of physical and chemical composition as requirement of end use industry. Page-50, Para-(e) is not described in light of the details of the processes adopted to upgrade the ROM to suit the user requirement.

**Progressive Mine Closure Plan:**

31. Page-57, Para-8.1, baseline information of the lease area has not been described as per guidelines. Further, base line information to be furnished for surrounding 500 meter form lease boundary.

32. The proposed land use pattern furnished in table at page no.- 64 and 68 are not matched to each other. It should be re-checked and corrected accordingly.

33. Page-63, progressive reclamation and rehabilitation of mined out land and waste dump have not been described. The measures are to be taken, furnished in details.

34. Monitoring station of air, noise and water should be described in text and their locations furnished in tabular form. Updated air, water, noise, ground vibration and soil data with analysis from laboratory done at specified periodicity to be enclosed.

35. Mitigation measures of impacts associated with mining i.e. mainly related to air, water, noise, vibration, land, aesthetics etc. are not given properly. The same to be elaborated.

36. Year wise plantation covering number of saplings to be planted, location and area covered may be furnished. Matured area of backfilling and dump slope should be stabilized with plantation.

**PRE FEASIBILITY REPORT:**

37. The content of feasibility/pre-feasibility report and analysis of economic viability of the project is not described in detailed as per rule 16 and Part-V of MEMC Rule 2015. A feasibility/pre-feasibility is a detailed comprehensive economic study of the selected development option for a mineral project. The economic viability of the project should be supported with NPV, IRR, Payback period by cash flow chart with cost involved in environmental and others protective measures and clearances, operational cost, administrative cost, infrastructure, royalty, NMET, DMF, closure cost etc.

**Plates:**

38. The key plan has not been prepared as per the provision of rule 32 (5) (a) of MCDR 2017 particularly the boundaries of all villages and towns with their population, forests with tree density, approach road to lease area have not been marked in key plan. Wind direction may show through wind rose diagram in key plan and environmental plan.
39. All plans and sections shall show a scale of the plan at least twenty five centimeters long and suitably subdivided. Magnetic Meridian and date of observation of should be given on all relevant plans. The plan and sections should be based on latest survey and same should sign by certified surveyor. CCOM circular no. 2/2010 and its addendum should be implemented.
40. In Surface Plan, few pillars may be correlated with some permanent ground features giving distance and direction. Different land use may be shown with colour codes. Forest & Non forest area, Surface right acquired area etc. should be marked clearly over a Surface plan.
41. In the Geological Plan lease boundary is to be marked as per standard symbol. Dip & strike is to be marked clearly. Area under G1/G2/G3.. are to be demarcated as per MEMC Rule 2015. UNFC codes are to be furnished in all the cross-sections. Proposed bore holes have not been marked in sections. The plan and sections should be revised as discussed in text.
42. In development plan proposed benches RL should be clearly depicted. UPL Shown in red color. Proposed infrastructure, waste dumping should be furnished year to year basis in different color codes. The index as furnished is not clear. The year wise development as shown should be in bold color. In development section progress of dumping retaining wall and garland drain should be shown clearly.
43. Environment plan: The Environment Plan as prepared should be satisfied the provision as laid down rule 32(5)(b) of MCDR2017. The drainage pattern of the lease area also to be shown on the plan. The surface features lying in 500m buffer zone has not been shown.
44. In Reclamation Plan, proposals of land restoration/reclamation, waste dump management, etc should be depicted yearwise with different colour codes.
45. Conceptual plan and section may be prepared considering mineralization as revealed from the exploration data. Direction of run off from the area based on surface contours may be shown on the plan and the sections.