



भारत सरकार Government of India  
खान मंत्रालय Ministry of Mines  
भारतीय खान ब्यूरो Indian Bureau of Mines  
क्षेत्रीय खान नियंत्रक का कार्यालय Office of the Regional Controller of Mines  
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फाईल संख्या File No: 614(2)/MP-B-286/08-DDN

देहरादून, दिनांक 2-01-2021

सेवा में/ To :

जी.एन. चौधरी / G.N Chowdry,

e-mail:gnchowdry@yahoo.com

17- इक्बाल कोलोनी, चनापोरा / 17-Iqbal Colony, Chanapora,

श्रीनगर, जे एण्ड के / Srinagar-190015 (U.T-Jammu & Kashmir)

विषय/Sub : Submission of Modification in Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Bajnar Bathyan (khrew) Limestone Mine, Mr. Umer Shafi Trumboo, S/o Mr. Mohd Shafi Trumboo, Mining lease over an area of 48 hectares located near Village-Bajnar Bathyan(khrew), Tehsil-Pampore, District-Pulwama, Jammu & Kashmir-U.T submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017

संदर्भ/Ref. : Letter from Mining lease holder vide No.TiPL/MAX/BAJ/US/MP/0035 dated 15.12.2020 received this office dated 28.12.2020

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Modification in Review and Updation of Mining Plan including Progressive Mine Closure Plan, hereinafter refer as MMP, on 28.12.2020. The same has been examined and found incomplete and incorrect. Various discrepancies/deficiencies/in-consistencies/gaps were observed which has been listed in enclosure to this letter as **scrutiny comments**. One copy of MMP has been forwarded to the State DMG, in case receipt of any comments from them the same shall be communicated to you subsequently.

You are advised to correct the submitted intial/draft MMP by addressing the incomplete details /information/inconsistencies/discrepancies/deficiencies appropriately and carry out necessary/required modifications and submit the mining plan afresh in **3 fair copies** within **15 days** from the date of issue of this letter in hard bound copies (no spiral binding) along with checklist (changes made scrutiny point wise). Also submit two CDs containing entire MMP i.e. text, plates, annexures, cover letter of final submission and checklist etc. In case if any other changes made in the MMP other than scrutiny comments, the details and reason/justification for doing so shall be given along with page numbers/plate no/annexure no. etc. You are advised to prepare the fair copies carefully and ensure that it is correct in all respect and submitted to this office within stipulated time. It is also advised to use both side paper to best possible extent, also optimize the use of drawing paper used in plates.

If the afresh/fair copies of Modification in Review and Updation of Mining Plan including Progressive Mine Closure Plan not received at this office within stipulated time then final action will be taken appropriately. Further if again deficiencies are observed then final action will be taken by this office without returning the copies for correction. This issues with the approval of competent authority

Encl: as above.

भवदीय Yours faithfully,

12.01.2021

(दामोदर प्रसाद शर्मा / D. P. Sharma)

सहायक खान नियंत्रक /Assistant Controller of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

1-खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर। (zo.udaipur@ibm.gov.in)

2- Umar Shafi Trumboo, C-63 Rajbagh Extension, Srinagar, (J&K-U.T)-190008 (tanveer@tcimax.in)

सहायक खान नियंत्रक /Assistant Controller of Mines



**Scrutiny comments, indicating incomplete details /information/inconsistencies / deficiencies etc in initially/draft submitted Modification in Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Bajnar Bathyan (khrew) Limestone Mine, Mr. Umer Shafi Trumboo, S/o Mr. Mohd. Shafi Trumboo, Mining lease over an area of 48 hectares located near Village-Bajnar Bathyan(khrew), Tehsil-Pampore, District-Pulwama, Jammu & Kashmir-U.T submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2021-22 to 2022-23.**

- 1) Cover page:
  - a. Name of the Lease holder is not matched with Lease deed and Identity proof.
  - b. Lease period is not matching with lease deed. No assumption is considered. Lease period should be supported with document proof.
  - c. Correct Rule Number under which Modification in Review and Updation of Mining Plan with PMCP shall be submitted elsewhere in the document.
  - d. ML No. if any shall be mentioned beside Mine Name.
  - e. U.T shall be written instead of State.
  - f. Category of mine is mismatched with Page no. 25
- 2) On Page No.1 & Para 3.6 of Page No.6, needs to be corrected w.r.t present/existing rule position and reason for modification in production enhancement is observed by 19%.
- 3) On Page No.3, validity of lease is not matching with lease deed.
- 4) On Page No.05, Para 3.3, Total meterage has not provided in implementation of exploration proposals.
- 5) On Page No.06, plantation proposals have not been achieved as per approved proposals and reason for deviation should be appropriately given.
- 6) On Page No.06, Para-3.4, Status of compliance of violations pointed out by IBM has not been incorporated.
- 7) On page No.16-24, it is to be explained appropriately that how the Mineable Reserves drastically increased and unrealistic when compared to previous approved Review & Updation of Mining plan with minimal exploration.
- 8) On Page No.16-24, Area and quantity under UNFC code 121 and 122 shall be reviewed and Review the estimation of geological Resources under 122. Review surface geological plan, sections and review the Reserves & Resources accordingly.
- 9) On Page No.24, table provided under R&R is mismatched with Table at page No.23. Recalculate entire reserves & resources under cement grade; mention the average grade of limestone in terms of radicals.
- 10) On Page No. 26, existing area under mining was given 6.9 ha in previous approved plan; here it is given 7.0604ha even after 3 years of working which is not realistic.
- 11) On Page No.26, bucket capacity of loading equipment is mismatched with details given on page No.31.
- 12) On Page No.27, permissible limit of ground vibration is not correct as per DGMS circulars.
- 13) On Page No.28, in Para of charge per delay, given depth of hole blasted is mismatched with bench height (bench parameter)
- 14) On Page No.35, Hole-depth with sub-grade drilling is even more mismatched with provided bench height; hence review the drilling parameters with suitable depth and give authentic & correct figures.
- 15) As it is found that detailed depth exploration up to depth where conceptual/ultimate pit profile Is given is yet to be done thus the aspect of pit optimization, conceptual pit to be addressed appropriately and to be given actual and real facts.
- 16) On Page No.39, the area of the mine till end of the lease validity (conceptual stage) is not correct.



- 17) On Page No.49, Table No. 8.1, as the approved mining plan is undergoing modification with enhanced production, area under mining for approved mining plan is not relatively matched with existing land use pattern. Justification for area under mining shall be given.
- 18) On Page No.52, Table No.8.3, existing area under mining is mismatched with Table No. 8.1.
- 19) On Page No. 70, remaining amount for financial assurance as bank guarantee shall be provided with final submission of mining plan with PMCP.
- 20) In PMCP chapter, proposals on details regarding development of green belt, afforestation on undisturbed land and worked out area i.e. reclamation of mined out area shall be adequate and separately given.
- 21) Plantation proposals are not sufficient for plan period. Bio-fencing may be included/explored and if appropriately.
- 22) Adequate mitigative measures shall be proposed to arrest the roll down material/muck/boulders/mine-waste/seepage water into gorge as evidence of natural slope heading towards east direction as per mine topography.
- 23) As per the Hon'ble Supreme Court of India order dated 08/01/2020, re-grassing of mined out area to be carried out. Accordingly, proposals may be furnished for restoration/reclamation/re-grassing of mined out area.

**Annexure:**

- 24) All test reports (air, water, noise) shall be updated.
- 25) Authenticated geo-referenced coordinates is not legible ( annexure no.12)

**Plates:**

- 26) Authentic lease plan shall be the basis for the preparation of all the plans and sections. There should not be any deviations in all the plans and sections with respect to configuration given in the lease plan.
- 27) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
- 28) Surface Plan, Plate No.3:
  - a. Excavation is evidenced beyond the 7.5m statutory boundary near boundary line A-B., necessary proposal/confirmation be given.
  - b. Dry Nala is not shown passing near boundary line B-C
- 29) Surface Geological Plan, Plate No.4:
  - a. Ultimate pit limit is not shown properly as per guidelines and text. It is mentioned in text that North-west direction of lease area is not suitable for mining but in this plan, UPL is considered for that area.
  - b. Level of exploration shall be clearly demarcated.
- 30) Sections for Surface Geological Plan, Plate No. 5:
  - a. Demarcation of bore holes is not matched with surface Geological plan (Plate No.4)/ UPL to be reviewed in view of proved R&R.
  - b. Section 8-8' is not correct with Surface Geological Plan (Plate No.4).
- 31) Development plans and section, Plate No. 6-7:
  - a. Demarcation of bore holes is not matched in sections w.r.t development plans
  - b. Demarcation of benches in section 3-3' is not matched with IVth year development plan
  - c. Detrimental to closure activities.
- 32) Environment Plan, Plate No.11:
  - a. Environment Plan is not as per Rule 32(5)(b) of MCDR 2017, important features i.e. other mining lease areas, if any excavations etc. within 500m are not shown.
  - b. As per lease deed and text no forest land is evidenced within the lease which is demarcated along boundary line G-K.
  - c. Environment plan is outdated. It is to be submitted updated plan
- 33) Conceptual plan, Plate No. 10:
  - a. Conceptual Sections do not match with Conceptual Plan w.r.t no. of benches and features.
  - b. Conceptual sections shall be adequately given.
  - c. Excavation is evidenced beyond ultimate pit limit to be explained/reviewed.



- d. Proposed conceptual limit/UPL especially along lease line GK need to be reviewed in view of safety of the village in western part of the pit at lease west side below sharp escarpment. Proper commentary to this effect be incorporated in Text also.
- e. Excavation is shown on sandstone bed where it is mentioned in the text that mining shall not be carried out.
- f. Ultimate pit limit is not correct. It is demarcated beyond blocked area.
- g. Existing ground profile shall be given in sections
- 34) Reclamation Plan, Plate No.9:
  - a. Ultimate pit limit is not clearly shown.
  - b. Pit profile will be the part of PMCP. Thus utmost care is to be taken while preparing PMCP proposals in its plan and sections.
  - c. Predominant wind direction is not shown.
  - d. Plantation priority shall be providing towards windward direction.
  - e. Bio-fencing to be tried sustainable, PMCP proposal.
- 35) Financial Assurance plan, Plate No. 8
  - a. Sum of the existing area under mining is not matched with the table.
  - b. Plantation area shall be given separately.
  - c. Review the area put to use and accordingly furnish the BG for financial assurance.

**General:**

- 36) The mine is located in hill slope of the high altitude mountainous terrain susceptible for seismic, other ground movement. Hence adequate proposals should also be incorporated in the document like controlled blasting techniques, erecting retaining walls, check dams, parapet walls to ensure safe, secure and systematic mining for ensuing years. Proposals shall be incorporated appropriately so that the adjacent environment, flora, fauna, public in villages shall not be affected by roll-down of any boulder/material or any other material etc from mine to outside.
- 37) Proposals for development of pit through proper benching in particular at the end of 5 years and also at conceptual stage shall be considered as proper closure activities as leaving steep and extra height benches would be proposals for development of benches during plan period shall be envisioned by keeping in view of PMCP proposals (reclamation / rehabilitation / restoration / afforestation in mined out area)
- 38) Preference shall be given to plan, design pits, benches, excavation so that the flowing material from mine towards low lying area be trapped/arrested appropriately.
- 39) Bank Guarantee shall be submitted and to be coterminous with plan period.
- 40) The sufficient number of colored photographs of the area showing existing status of the lease area, benches, boundary pillars, mines office, etc may be submitted with proper captions
- 41) All the proposals should be made within ML only.
- 42) Review of the Mining Plan has not been prepared as per guidelines
- 43) Document is deviating with guidelines issued by IBM ensuring proper documents for systematic mining proposal for mineral conservation and environment protection.
- 44) All the plates should be attested by Surveyor, for their authenticity and shall be self-certified that plans and sections are based on the lease map authenticated by the State Govt.
- 45) All the annexure should be attested by qualified person for their authenticity.
- 46) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 47) There are several typographical mistakes which required to be corrected.
- 48) Two CDs covering the entire document and plans should be enclosed at the time of final submission. Undertaking in this regard by qualified person should be given that the CD contains the same text & plates as submitted in hard copy. KML file shall also be submitted along with final submission.
- 49) Note: All the corrections mentioned in the text and plates shall also be attended invariably

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