



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)/MS-B-159/07-DDN

देहरादून, दिनांक 04-02-2021

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 Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Salinar Satur Marg Khrew Limestone Mine, Mr. Riyaz Ahmed Panjra, Mining lease over an area of 29.4151 hectares located near Village-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.Nil dated 25.12.2020 received this office dated 06.01.2021

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft/intital Review and Updation of Mining Plan including Progressive Mine Closure Plan, hereinafter refer as RMP, on 06.01.2021. 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 RMP has been forwarded to the U.T-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 RMP 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 RMP i.e. text, plates, annexures, KML, cover letter of final submission and checklist etc. In case if any other changes made in the RMP 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 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,

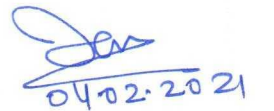
(दामोदर प्रसाद शर्मा / D. P. Sharma)

सहायक खान नियंत्रक /Assistant Controller of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

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

2- Riyaz Ahmed Panjra, RCC Plaza, Nowgam Bypass, Srinagar-J&K(U.T)-190015 (info@cemtac.com)


04.02.2021

सहायक खान नियंत्रक /Assistant Controller of Mines

Scrutiny comments, indicating incomplete details /information/inconsistencies / deficiencies etc in initially/draft submitted Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Salinar Satur Marg Khrew Limestone Mine, Mr. Riyaz Ahmed Panjra, Mining lease over an area of 29.4151 hectares located near Village-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 2025-26.

- 1) Planning shall be given for lease period only, based on executed lease deed/and/or supplementary lease deed.
- 2) Cover page:
 - a. Lease period is not matching with enclosed lease deed elsewhere in the document. Lease period should be supported with document proof.
 - b. As per lease deed, it is valid up to 08-09-2022.
 - c. ML No. if any shall be mentioned beside Mine Name.
 - d. U.T shall be written instead of State.
- 3) On Page No.4-5, given Boundary pillar coordinates(authenticated) are not matching with previously approved mining plan, and according the excavation along boundary may have impacts, else excavation outside lease area.
- 4) On page No.8, Status of violation letters issued by IBM and its compliance Status shall be provided.
- 5) On Page No.14, reserves under 121 are not appearing justified. Review Reserves & Resources.
- 6) On Page No.16, Though it is a working mine since more than 20 years, still resources have been considered under area to be explored fully as per rule 12(4) of MCDR, 2017. Entire potentially mineralized area to be explored under G-1 axis/level on or before 26-02-2022.
- 7) On Page No.15 and 18, reserves under section 4-4' and 5-5' is not matching.
- 8) On Page No.20-21, it is to be explained appropriately that how the total reserves and resources drastically decreased and it is unrealistic when compared to previous approved Review & Updation of Mining plan drilling had done more than proposed in previous approved plan. Review reserve and resources accordingly and along with prepare Surface geological plan, drilling done is not shown in SGP & sections.
- 9) On Page No.22, Category of mine is not matching with cover page and elsewhere in the document.
- 10) On Page No.34, Hole-depth with sub-grade drilling is not matching with provided bench height; hence review the drilling parameters with suitable depth and give authentic & correct figures.
- 11) On Page No.33-34, Drilling and blasting calculation table is mismatching with bench design and production. And in Para of charge per delay, given depth of hole blasted is mismatched with bench height (bench parameter)
- 12) On Page No.35, requirement of dumpers for production is not matching with details given on page No.24.
- 13) On Page No.37, The area of the mine till end of the conceptual stage is not w.r.t ultimate pit limit and is not realistic.
- 14) On Page No.37, area for plantation with respect to saplings proposed is not realistic.
- 15) On Page No.50, Total land area usage during plan period is mismatching with net area given in financial assurance table.
- 16) On Page No.51, Air quality data/permissible limits is not given.
- 17) On Page No.70, Financial assurance provided by lease holder was Rs. 10,00,000 and its validity up to 26-11-2022. Additional amount as per net area put to use area shall be submitted. It is to be ensured that FA shall be coterminous with plan period and in latest format.
- 18) On evidence of .kml of mining lease, some excavation is observed towards south direction near boundary line I-J-K.
- 19) Bio-fencing may be included/explored appropriately.
- 20) Revenue plan in legible form along with its soft scanned copy shall also be submitted.


- 21) Mineable proposed excavation has been increased to 55% w.r.t maximum previous plan proposal, whereas the reason is not discussed in mining chapter.
- 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.

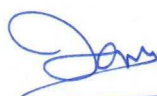
Plates:

- 25) 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.
- 26) Lessee shall be responsible for precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
- 27) Grid is not uniform in all plans and sections
- 28) Surface Plan, Plate No.3:
 - a. Surface features at boundary pillar O-P –Q is not matching with surface plan. All existing features shall be properly addressed.
 - b. 3 Ground control points are not properly demarcated.
 - c. Forested land is shown in this plan which is not evidenced in text and elsewhere in the document.
 - d. Bench height is given 6m in text, whereas benches are demarcated on 12m contour level.
- 29) Surface Geological Plan, Plate No.4:
 - a. UNFC code & Axis of exploration shall be clearly demarcated and colored separately which is not evidenced in the plate.
 - b. Talus and Scree is not mentioned elsewhere in the text.
- 30) Sections for Surface Geological Plan, Plate No. 5:
 - a. All the sections are not matching in line with UNFC code in SGP, Plate no.4
 - b. Projection of bore holes invariably be drawn in section lines passing nearby the section lines
 - c. On section 8-8' and 9-9' along with mineralization under 111, there is coding of mineralization under 121 basis of arriving at this level needed to be discussed in the plan
- 31) Development plans and section, Plate No. 6-10:
 - a. Contours shall be properly shown.
 - b. Foresight to closure activities.
 - c. Adequate sections of development/year wise mine proposal plans are not given
- 32) Conceptual plan, Plate No. 11:
 - a. Name is not correctly written.
 - b. Conceptual plan is not matching with the commentary in the text.
 - c. Conceptual Sections do not match with Conceptual Plan w.r.t no. of benches, bed and features.
 - d. Adequate sections of conceptual plan showing UPL are not given.
 - e. Excavation is evidenced beyond ultimate pit limit to be explained/reviewed
 - f. Existing ground profile shall be given in each sections
- 33) Reclamation Plan, Plate No.14:
 - a. Ultimate pit limit is not shown in index.
 - b. Proposed configuration of pit shall also be the part of PMCP. Thus utmost care is to be taken while preparing PMCP proposals and its implementation in its plan and sections.
 - c. Predominant wind direction is not shown.
- 34) Environment Plan, Plate No.13:
 - a. Environment Plan is not as per Rule 32(5)(b) of MCDR 2017,
 - b. Wind direction is not shown.


04.02.2021

Other Scrutiny Points:

- 35) 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 long term period. 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.
- 36) Proposals for development of pit through proper benching in particular at the end of plan period years and also at lease expiry period shall be considered as proper closure activities as leaving steep and extra height benches would be detrimental to the Environment. 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)
- 37) Design of pits, benches & excavation shall be in such a manner that the roll down material from mine towards low lying areas especially towards habitation, public roads/rail/river etc be trapped/arrested appropriately.
- 38) 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
- 39) All the proposals should be made within ML only.
- 40) All the plates should be verified by Surveyor, for their authenticity and certificate to be given in each plate and also to certify that prepared plans and sections are based on the lease map authenticated by the State Govt.
- 41) All the annexure should be attested by qualified person for their authenticity.
- 42) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 43) There are several typographical mistakes which required to be corrected.
- 44) 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.
- 45) Note: All the corrections mentioned in the text and plates shall also be attended invariably


04.02.2024