



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
100, ओल्डनेहरू कालोनी, देहरादून (उत्तराखण्ड) 248001 /100 Old Nehru Colony, Dehradun (U.K.) 248001
TEL- 0135-2676350 / 2671896, E-mail – ro.dehradun@ibm.gov.in



फाईल संख्या File No: 614(2)/MP-A-277/21-DDN

देहरादून , दिनांक 15-03-2021

सेवा में/ To : Sandeep Kumar Jain,
M/s RCCPL Private Limited
(earlier M/s Reliance Cement Company Private Ltd),
2nd Floor, Industry House,
159, Churchgate Reclamation,
Mumbai-400020

e-mail:sandeep.jain@birlacorp.com

विषय/Sub: Submission of draft/initial Mining Plan with Progressive Mine Closure Plan in respect of Sgrathi Limestone deposit of M/s RCCPL Private Limited (earlier M/s Reliance Cement Company Private Ltd), over an area of 599.1935 hectare in Village-Up-Mahal Kumarijala, Ara, Kandal & Up-Mahal Gijorta Sub-Tehsil-Nerwa, Tehsil-Chopal, District –Shimla of Himachal Pradesh, submitted under Rule 16(1) of Minerals (Other than Atomic & Hydro Carbons Energy Minerals) Concession Rules, 2016 & 23 of MCDR 2017.

संदर्भ/Ref. : 1. Letter from Mining lease Applicant of vide No.RCCPL/HP/193 dated 21.01.2021 received on dated 25.01.2021
2. Joint Inspection carried out at applied mining lease area dated 19/20-02-2021

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Mining Plan including Progressive Mine Closure Plan, hereinafter refer as MP, on 25.01.2020. The same has been examined through joint inspection 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 MP 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 MP by addressing the 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 MP i.e. text, plates, annexures, cover letter of final submission and checklist etc. In case if any other changes made in the MP 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 fair copies 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

भारतीय खान ब्यूरो / Indian Bureau of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुरा (zo.udaipur@ibm.gov.in)
- 2- Pracheta Majumdar , M/s RCCPL Private Limited (earlier M/s Reliance Cement Company Private Ltd), 1, Shakespeare Sarani, A.C Market, Kolkata-700071 (pmajumdar@birlacorp.com)

सहायक खान नियंत्रक /Assistant Controller of Mines

Scrutiny comments, indicating incomplete details/ information/ inconsistencies/ deficiencies etc., in initially submitted Mining Plan with Progressive Mine Closure Plan (MP) including supporting documents of Sugrathi limestone Deposit of M/s RCCPL Private Limited (earlier known as Reliance Cement Company Private Limited) over an area of 599.1935 Ha located near villages Up-Mahal Kumariala, Aara, Kandhal & Up-Mahal Gijorta, Tehsil-Chopal, District-Shimla of Himachal Pradesh State submitted under Rule 16(1) of M(OAHCEM)CR 2016 & 23 of MCDR 2017.

1. As per provisions of MM(D&R) Act, 1957, as amended upto date, the fresh grant of mineral concession and applicability of M(OAHCEM)CR 2016 is only in accordance with section 10A(2)(b) of MMDR Act 1957, whereas this aspect is not explicitly evident from Letter of Intent vide letter no: Udyog-Bhu(Khani-4) Major-381/2016-8295 dated 20-01-2021 enclosed with the submitted MP.
2. Precise area demarcation report of PL area and Authentic Prospecting License (PL) area plan with DGPS coordinates of boundary pillars duly verified by Geology & Mining department of State Government (DMG herein after) has not been enclosed. This is essential for the geo-referenced spatial location of the PL area and applied area of ML thereof.
3. In LOI dated 20-01-2021 as submitted in annexure-01, as per condition No.01 in LOI, Precise demarcation report with DGPS coordinates of Mining lease boundary pillars authenticated by DMG is not found enclosed.
4. Applied Mining Lease area plan duly authenticated by State DMG with DGPS coordinates is not enclosed, which shall be the basis for the preparation of all plans and sections. It is to be noted that devoid of authentic demarcation, verification/examination of all proposals for the mining plan can't be examined appropriately.
5. PL was granted for mineral limestone, Shale & Quartzite. Subsequently LOI was granted for limestone & Shale only. However Mining Plan is submitted for limestone, Shale & Quartzite. Such inconsistencies among PL and LOI are not addressed.
6. Plate No.02, Khasra Plan is not depicting, the fact on revenue plan that applied ML area is falling within the PL area. Further the said superimposed plan is also not authenticated by the State Government.
7. Name of villages in which applied mining lease area falls for the grant of mining lease indicated in mining plan, Letter of Intent and on Resolution of Board of Directors are different. In Mining plan and Resolution of Board of Directors, name of villages in which applied area falls indicated as Kumariala, Ara, Kandal & Gijorta whereas in LOI names of villages in which applied area falls are Kandal, kumarla, Gijarta & Arah.
8. Cover Page and elsewhere:
 - a. Lease period and lease area is mentioned, whereas lease is not granted yet.
 - b. Area as per LOI is not matching with figures given on cover page
 - c. Name of rule is not mentioned precisely and correctly.
 - d. The Status of Applicant is not lessee, therefore details given is incomplete and incorrect.
9. Mining plan shall be prepared as per M(OAHCEM)CR 2016 & MCDR 2017, whereas name of rules are given incorrectly in various chapters.
10. Appropriate term of Mines Act 1952 to be given in the active document.

11. In the entire Opencast Mining Para, a typical term is observed i.e. Over Burden/Inter Burden as shale, not found appropriate. Whereas LOI is given for shale also. Further unit abbreviations are used not in standard term and full form is also not given properly.
12. On Page No. 07, it is mentioned that applicant intends to mine limestone, Shale & Quartzite minerals but LOI is issued for only Limestone & Shale.
13. On Page No.10. Bifurcation of area under various schedules/types of land like Govt./Private/Agriculture/Grazing etc. duly authenticated from appropriate authority is not found enclosed.
14. On Page No.11, It is given that no PWD road is passing through applied mining lease area which is not correct as road is found passing during the field inspection.
15. On Page No.15, It is indicated in the document that the average temperature of the area in summer are 19^o and 28^o and in winter are 1^o and 10^o which appears incorrect. In fact these figures may be minimum and maximum of the indicated seasons.
16. On Page No.30, adequate scientific evidence and geological details shall be provided for mentioning non-mineralized area of 23.208ha.
17. On Page No.40, area-wise bifurcation in various G-axes shall be provided for entire applied area.
18. Certificate for Bulk density/Tonnage Factor/Specific Gravity of limestone and other minerals in the applied area by NABL accredited lab is not found enclosed.
19. Litho details of BH-18, BH-19, BH-27 and BH-32 are not matching with Surface Geological Plan and Sections of with respect to Geological Report.
20. On Page No.46, Allowances in resource estimation 30% are mentioned, whereas no scientific stipulations have been given for considering such factor/allowance. This will substantially affect the estimation of Reserves and Resources.
21. On page No.49, (Soft copy), area to be worked is proposed 'Nil' which is not correct in reference to various proposals & activities evident from various plans & sections and facts/proposals given elsewhere in the text. Thus necessary corrections shall be made at all relevant pages in text, plates & sections.
22. On Page No. 51 (soft copy), "No working will be done during first and second years" are not true & correct.
23. On Page No. 51, "to be broken up area" in the form of development work/access routes and haul road preparation during the first two years has not been provided. Further nowhere the excavated quantity and type of mineral excavated and location of its stacking, re-handling etc. evidenced from such development work.
24. On Page No. 51, a tentative scheme of mining and annual programmes and plan for excavation from year to year for five years shall be given in scientific manner in tabular approach which is to be given as rule 13(2)(e) of M(OAHCEM)CR 2016.
25. On Page No.53, in table of in-situ tentative excavation, quantity of ROM is incorrect and volumetric values are not matching with respective tonnage.
26. On Page No. 55(Soft copy), Para "Site clearing....locomotive will be used" is not given appropriate technical details including mineral conservation aspect.
27. From Page No. 56-64, it is mentioned that working will be carried out in two shifts of 8hours but calculation for adequacy of HEMM deployment is taken only 11 working hours which needs to be reviewed.

28. Pit design parameters are given on approximation and not commensurate with the proper HEMM like 6 cum excavator, 55 tonne dumper, 150mm ϕ drill machines etc. Precise details of haulage ramps to be given and accordingly the pit design may affect the area put to use during 1st five years and so on up to conceptual stage.
29. Year wise bench configuration including haulage routes and ramps are not shown in plans and from sections it is revealed that haulage routes matching to the maximum width of HEMM has not considered while excavation planning and scheduling.
30. As per LOI the applicant during mining operations shall carry out meticulous planning for all minerals w.r.t drilling, grade control, excavation, separation, stacking, accounting for its use/consumption, balancing in stock etc. Whereas in the mining chapter it is not reflecting on all vital aspects from identification-mining to ore-accounting, necessary changes shall be made at all relevant chapters.
31. On Page No.56, Ramps are proposed steeper than 1 in 16 gradient. Any gradient steeper than 1 in 16 shall be proposed only after obtaining competent approval.
32. Properly define the overburden and keep it separate with shale. Proposal for usage of bunds with overburden is also not clear. Refer page No.61 of soft copy.
33. On Page NO.61, It is stated that Ground water seepage will not be encountered because the horizon proposed for exploitation is above the ground water table. From the Statement it is not clear whether the statement is based on any study or else, needs be discussed.
34. On Page No.64, Hauling capacity per day per dumper (55 tonne) is 390 tonne is not sufficient. Need to review.
35. On Page No.68 and elsewhere in the document, it is mentioned that area under mining/pit is given 9.381 ha but on Page No.52&53, area degraded is calculated as 18.41ha which is mismatching. Thus assessment of actual degraded area be calculated appropriately and give correct details with proper clarification/remarks if any.
36. On Page No.69, Indicated maximum and minimum depth of working is not matching with development plan.
37. On Page No.72 (soft copy), quantity of OB/Mine waste (cum) is not correct.
38. On Page No.73-74 (soft copy), measurement methodology is not addressed in this chapter.
39. On Page No.75, 6.0(b), Material Balance chart with a Flow Sheet or Schematic diagram of processing/sizing/segregation shall be provided as the crusher units are proposed within the applied area.
40. Being the area eco fragile zone, no effort is seen by applicant to carry out mining with novel mining technologies and latest equipments to avert drilling & blasting like surface miners etc or other techniques like pre-splitting, latest technology drill equipments.
41. Being the proposed orientation of benches facing, habitat, public road and the topography indicates open slope (not valley), thus bench face angle shall be kept appropriately lesser than 80° , till any scientific study is carried out. May note that once excavation on top benches, close to UPL, commenced with steeper angle then it might not be feasible to reduce such slopes to safer angle. Thus 80° proposed for face angle is not tenable at this stage. In addition to this, possibility of orientation of face which is presently facing the habitation area may be reviewed from safety point of view, like, fall of fly-rocks/boulders/landslides etc.
42. Bench profiles of proposed development plan & conceptual plan (in attached drawings) is not matching with pit design parameters. Incorporating precisely the bench design parameters, ramp/haulage routes in active mining area will increase the area put to use.

Thus calculation of area put to use and calculation for further application of rules made under Act will also be reviewed.

43. Area of proposed greenbelt, Afforestation/plantation for reclamation of broken up area shall be accounted separately.
44. Review the excavation quantity of waste / interburden / other mineral reject, sub-grade generation of mineral in LOI during 1st to Vth yr (also refer Para 26)
45. On Page No. 79, PMCP land use pattern as per revenue details like forest, Gochar (pasture), agriculture etc for total applied ML area is missing. It shall also be given as an abstract of type of land out of total revenue details of the area, Khasra area(individual) shall also be given to verify such abstract of land.
46. On Page No.88, Adequate Proposals for regular monitoring of ground vibration / AOP due to blasting is not given in mining plan being the area eco sensitive zone. Proposal may be given to monitoring every blast for ground vibration and AOP.
47. On Page No. 89, Ground water study is not given and its Ground water station, coordinates of location is also not given.
48. On Page No. 80, Ambient Air quality w.r.t PM₁₀, PM_{2.5} monitoring is not given separately.
49. On Page No. 90, Mineralogical analysis for PM₁₀, PM_{2.5} as mentioned is not given.
50. On Page No.93, details of Year wise proposals to be furnished under rule 13(2)(e) of M(OAHCEM)CR 2016 is not furnished.
51. Initially mining/excavation proposal is given in the area where hutments and residents of human settlement is noticed which is north of Bore Hole-18 where this fact is not brought into the notice and no proposal of addressing the issue is given.
52. Expenditure for implementation of PMCP proposals is not provided in PMCP chapter.
53. Public road is passing through the lease area connecting various villages. This issue is not addressed in the plan (PMCP) and no action for proposals of mitigative arrangement /diversion/ competent approval is given.
54. Initial Development of green belt preferably towards prominent wind direction is to be proposed, which is not evident.
55. It is to be confirmed that any religious place(s), religious place(s) of local sentiments is covered under mining area or not and wherever the safety distance kept from them, if any.
56. Proposals for Minor mineral, i.e. Shale (Quartzite) is given which the applicant intends to mine, wherein Quartzite is not mentioned in LOI. Further the proposals for minor minerals needs to be given separately and explicitly along with robust accounting mechanism from drilling to its weightment and compliance thereof.
57. The applied mining lease is located in hill slope of the high altitude mountainous terrain susceptible for seismic sensitivity, other ground movement as natural slope is towards habitat. Hence adequate proposals should also be incorporated in the document like controlled blasting techniques, erecting adequate 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 flora, fauna, public in villages shall not be adversely affected by roll-down of any boulder/material or any other material etc from mine as habitat is quite close especially towards lower level of lease boundary.
58. Proposals for development of pit through proper benching, in particular, at the end of plan period and also at lease expiry period shall be considered as part of proper closure activities because 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). Provision of natural barrier to arrest the roll down material/boulders mine waste etc shall be provided

59. Sufficient number of colored photographs of the area showing existing status of the applied lease area, boundary pillars etc may be submitted with proper captions.
60. All the proposals should be made within ML only.
61. State boundary of Uttarakhand and Himachal Pradesh is evidenced extremely close to the applied mining lease area. This needs to be examined thoroughly and if applicable competent authority of both the States be informed appropriately.
62. All the annexure should be attested by qualified person for their authenticity.
63. Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
64. There are several typographical mistakes which required to be corrected.
65. There might be slight changes in referenced page numbers as there is variation in Hard & soft copies. Thus all the points shall be addressed by QP.
66. Geo-referenced KML file print superimposed on satellite imaging application may be given. Preferably on A3 size, suitably folded to A4 size and attached as Annexure. KML file in soft format shall also be submitted along with final submission.
67. 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.

Plates

68. 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.
69. All the plates should be verified by QP and 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.
70. Title of almost all the plates is incomplete and incorrect. The applicant who is at present not a lessee to this area is submitting the document as lessee.
71. On Plate No.02, Composite Khasra Map of applied ML is not authenticated.
72. Grid is not given on various plates.
73. 7.5m statutory boundary is not evidenced in all plates.
74. Surface plan, Plate Nos.04A-04B:
 - a. Coordinates are not shown on all boundary pillars,
 - b. One of the lease boundary pillars shall be connected with three ground control points which is not given.
 - c. Existing surface features shall be adequately provided.
 - d. Appropriate Bench Mark shall be given with latitude-longitude (geo-referenced) and level through which the survey of entire area for ground throttling through Total Station and/or Drone was carried out.

- e. Surface plan is incomplete as the various types of land/land use pattern like pasture land/private agriculture land/Govt. land/ forest land is not shown new pit. Date of survey is not given on various plates.
- f. A composite Surface plan showing entire lease area need be enclosed with the document (may be on appropriate scale).

75. Surface Geological Plans & Sections, Plate Nos.05A,05B,06A-06E :

- a. Ultimate pit limit is not demarcated.
- b. Proposed Borehole coordinates shall be provided in mentioned plans.
- c. Bore holes are proposed in non-mineralized zone which is not discussed in text.
- d. Dolomite is shown in plan wherever not discussed in text.
- e. The Lithological status shown on Surface Geological Plan and Sections differ with respect to the following borehole logs enclosed with the document:
 - i) Borehole log of BH No. 5 and section line drawn from S8-S8'
 - ii) Borehole log of BH No. 14 and section line drawn from S14-S14'
 - iii) Borehole log of BH No. 17 & 24 and section line drawn from S18-S18'
- f. Different Color codes for showing mineralized area under different category of mineralization should be selected so that there may not be any confusion. In this case color codes used for showing G1 & G3 levels are almost same.
- g. Plan is prepared for hilly region. So, importance of contour values becomes high for understanding the plan. Therefore contour values of contours atleast at a gap of three contours are necessary in this case. Being a big area the contour values need be indicated at lateral distance of 800m.
- h. G2 level of mineralization envisaged over on Quartzite outcrop between section line S18-18' and S20-20' nearer to the PBH 78. The dip of outcrop bed is almost 35° which not appear favorable for consideration of mineralization at depth. Thus there is a need to review the G2 level of mineralization particularly in this part of the area.
 - i. Dip of the deposit has not been taken into account in drawing of section lines.

76. Mine development and production plans, Plate Nos.07-09:

- a. 1st & 11nd year development and production plans are not provided. It is to be provided as per rule 13(2)(f) of M(OAHCEM)CR 2016.
- b. Lease corner pillar nomenclature and co-ordinates are not given on these plans.
- c. Sections depicting year-wise (all years together) excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given
- d. Benches and their levels shall be given in plan so that benches are correlated among various sections.
- e. Adequate & appropriate development proposals to protect of run-off from mine towards river/ rivulet are not given.
- f. Haulage road at mine face/ year-wise development plan / year-wise excavation proposal are not shown. Also Haulage road is not shown in conceptual plan and the proposals are practically not appearing feasible.



77. Environmental Plan, Plate No.10,
- a. Air, water, noise monitoring stations coordinates shall be provided.
 - b. Surface features regarding land pattern shall be demarcated in and around buffer and core zone.
 - c. Various features as mentioned in Rule 32(5)(b) of MCDR 2017 may be given in Environment plan.
 - d. Boundary pillars are not shown on the plan
78. On Plate No. 13, of Reclamation Plan, prominent wind direction shall be given. All PMCP proposals should be marked on reclamation plan.
79. Conceptual plan, Plate No.11,
- a. Bench profile shall be given on plan also, and then only benches in sections can be validated.
 - b. Pit design parameters are not evident (H/W/slope). Prepare the Conceptual Plan strictly as per bench design parameters including haulage routes to be kept intact till end.
 - c. Haulage road at mine face/ year-wise development plan / year-wise excavation proposal are not shown. Also Haulage road is not shown in conceptual plan and the proposals are practically not appearing feasible.
 - d. Conceptual plan/sections and other plans needs to be redrawn as pit design parameters are not matching with proposals in sections. (one of the example is that the vertical bench without haulage routes/ramps are given)
 - e. Boundary pillars are not shown on the plan.
80. On Plate No.12, Financial Assurance plan is not showing the area put to use correctly. FA table shall be given in the plate accordingly area shall be demarcated.
81. On Plate No.12, Boundary pillars are not shown on the plan.
82. Except Environmental Plan, all other plans & sections should be restricted to proposed/authenticated mining lease area only. No proposal should be made outside the ML area.

Annexure

83. Complete details of Initial PL deed are not enclosed at Annexure 3
84. Pre-feasibility study,
- a. Criteria for selecting the proposed ML area out of PL area are not indicated.
85. Modifying factors for classifying UNFC various codes are not clearly evident.
86. At various BH log sheet, assay values are not given

Note: All the corrections mentioned in the text and plates shall also be attended invariably.

