



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 (उत्तराखंड) 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)/MS-B-53/98-DDN

देहरादून , दिनांक 11-02-2021

सेवा में/ To : श्री पंकाज पाण्डे,

e-mail:sahajsahyog990@gmail.com

मैसर्स सहज सहयोग कंसल्टेंट प्राइवेट लिमिटेड , B-1/21, Sec.-B

अलीगंज, लखनऊ – यू।पी।

Shri Pankaj Pande,

M/s Sahaj Sahyog Consultants (P) Ltd, B-1/21, Sec.-B,

Aliganj, Lucknow-U.P

विषय/Sub: Submission of Review and Updation of Mining Plan with Progressive Mine Closure Plan in respect of Dundu Magnesite Mine by M/s N.B Minerals Corporation, for a mining lease over an area of 4.241 Hectares located at near Village-Dundu, Tehsil-Didihat, District-Pithoragarh of Uttarakhand, submitted under Rule 17(2) of Minerals (Other than Atomic and Hydro Carbons Energy Minerals) Concession Rule, 2016 & Rule 23 of Mineral Conservation and Development Rules-2017

संदर्भ/Ref. : Letter from Mining lease holder vide No.Nil dated 13.01.2021 received this office dated 25.01.2021

महोदय/ Sir,

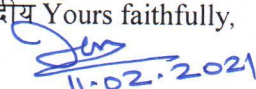
This office is in receipt of two copies of the above-mentioned initial/draft Review and Updation of Mining Plan including Progressive Mine Closure Plan, hereinafter refer as RMP, on 25.01.2021. The same has been examined and found incomplete and incorrect. Various discrepancies/deficiencies/in-consistencies/gaps were observed which has been listed in enclosure to this letter as **scrutiny comments**. One copy of RMP has been forwarded to the 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 initial/draft RMP 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 RMP i.e. text, plates, annexures, 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,  
  
11.02.2021

(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- M/s N.B Minerals Corporation, Newaran Nagar, Parashar Niwas, Nawabi Road, Haldwani, Distrcit-Nainital, U.K-263139 (nbmineralscorporation@rediffmail.com)

सहायक खान नियंत्रक /Assistant Controller of Mines

**Scrutiny comments, indicating incomplete details /information/inconsistencies / deficiencies etc in submitted Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Dundu Magnesite Mine, M/s N.B Minerals Corporation Mining lease over an area of 4.241 hectares located near Village-Dundu, Tehsil-Didihat, District-Pithoragarh, Uttarakhand State submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2021-22 to 2025-26.**

- 1) Valid Mining Lease deed is not found annexed in submitted Review of Mining Plan.
- 2) **Draft/Initially submitted Review and Updation of Mining plan with PMCP is not as per Standard prescribed format adhering on Para, sub-Para, devised table are essential for consideration of document for approval and document is grossly deviating ensuring proper documents for systematic mining proposal for mineral conservation and environment protection guidelines issued by IBM.**
- 3) Cover page:
  - a. Validity of lease period is not correct.
- 4) Lease Co-ordinates are not matching with the co-ordinates mentioned in previously approved Scheme of Mining (hereafter referred as SOM) and authentication of lease coordinates by State-DGM shall be provided.
- 5) On page No.01 and 03, validity of mining lease period is incorrect. In Introduction, Location and accessibility Para, it is mentioned that lease period has been extended upto 31-03-2030 as per provided annexure no.4. On examination of office records, it is a matter of fact that this mine is a non-captive mine and lease deed shall be extended according to extant of provision of MM (D&R), 2015. Accordingly, supplementary deed shall be submitted.
- 6) On page No. 07, Para 3.3 table, No efforts has been made for exploration and the compliance position for Exploration is not justified properly. Exploration must be carried out as per approved Mining plan/SOM. Compliance position of Exploitation, year wise Mine development, Reclamation/Rehabilitation and afforestation is not substantiated as per provision of rules. Besides extent of Mining including dumping of waste material etc. is seen outside mining lease area near Pillar F.
- 7) On Page No.7, Review of Mining Plan: In place of year-wise review a consolidated item wise review has been given in the document. There is standard practice of year-wise review of approved proposals with respect to all the proposals approved in earlier mining plan.
- 8) On Page No.9, Afforestation: Unit of proposed as well as actual plantation incorrectly given in tonnes, needs correction
- 9) On Page No. 12, Para I, Exploration proposals are not provided as per Rule 12(4) of MCDR, 2017.The holder of a mining lease shall carry out detailed exploration (G1 level) over the entire potentially mineralized area under the mining lease. However, as an existing mining lease, Lessee couldn't be carried out G1 level exploration as proposed in SOM.
- 10) On Page No. 15 and 20, it is evident that during updation of Total Reserves and Resources they are abnormally reduced without any proper justification/ No Exploration carried out and as compared with previous approved SOM which has to be justified properly. Review estimation of reserve and resources. When lease has magnesite, soapstone, dolomite why only magnesite is proposed?

- 11) On Page No. 23, pit design parameters, especially bench width, haul road with, face angle and overall pit slope is not synchronized with proposed HEMM. The overall pit slope is not realistic w.r.t design parameters.
- 12) On Page No. 24, in table of In-situ Tentative Excavation, during plan period, proposed production of ROM of magnesite is exceeded with mineable reserve (111) which is not correct.
- 13) On Page No. 33, Para b & d, it is mentioned that rain water shall channelize through the slopes & gullies and meet the natural drainage whereas it is to explained in detail with demarcation in separate plan showing drainage pattern from in and around lease area within 60m beyond lease area.(only drainage & contours).
- 14) On Page No. 30 & 34, it is mentioned that from fourth and fifth years the waste to be generated shall be used for purpose of backfilling whereas it has to be proved of non existence of mineral. This proposal is in violation of Rule 14 of MCDR 2017.
- 15) On Page No.39, MCDR 2017 Rule shall be mentioned under submission of PMCP.
- 16) 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.
- 17) On Page No. 44, Para VIII, scientific proof for slope shall be provided along with slice plan of benches with slope of pit.
- 18) On Page No. 45, Action of cumulative result on PMCP till date to be given. Give the execution of earlier proposals so far separately.
- 19) On Page No. 51, Financial Assurance per ha is shown wrong and quoted that under 23(F) of amended rule of MCDR 2017.
- 20) On Page No. 51, additional required area under mining is not realistic with respect to proposed production and area given in mining chapter.
- 21) Page No. 46, Under reclamation & rehabilitation, it has to be justified that anticipated survival rate of saplings is less envisioned.
- 22) 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.
- 23) As per summary of year-wise proposals table, Dump re-handling for back-filling purpose, fourth year and fifth year proposal were given but nowhere described in the waste Dump Management. However, it is foreseen in year wise working plans (plate Nos. 6 & 10) which has to be clarified.
- 24) What is meant by exploration pit as shown in various Plans & Sections?
- 25) You have to incorporate all such measures/provisions, directives of Hon'ble NGT in OA No.995 of 2016.
- 26) Material, muck etc. are found spread into the outside mining lease in natural environment and all adequate measures to trap all rolling material shall be taken in First year of study & robust design.
- 27) All the proposals should be made within ML only.
- 28) Review of Mining Plan has not been prepared as per guidelines.
- 29) 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.
- 30) Natural obstruction is not proposed to arrest the runoff/roll down with in the mining lease area. Refer NGT, O.A No. 995/2019 order dated 16.09.2020 for necessary proposal.
- 31) Enclosed NGT, O.A No. 995/2019 order dated 16.09.2020 shall be complied.

- 32) 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.

**Plates:**

- 33) 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.
- 34) Certificate to the effect that plans and sections is prepared based on lease map authenticated by State Govt. on all submitted plates is not incorporated.
- 35) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
- 36) Plate No. 2, Scale of key plan is not mentioned.
- 37) Land use pattern have not been shown on any plans where it is essential to it. Although there is index for the purpose in the respective plans but the same are left blank. It is not desirable.
- 38) Surface Plan, Plate No.3:
- Nowhere three Ground Control points including its distance are not demarcated in the Surface Plan
  - As per text, there is no magazine lied in mining lease area whereas in the provided surface plan it is demarcated within the mining lease.
  - Existing dump location is not matching with text and field inspection.
- 39) Surface Geological Plan, Plate No.4:
- There is proposal of two bore holes to be put on existing pit bottom to ascertain the mineralisation in depth. It is evinced that bore hole is proposed in existing pit which is not required. It shall be proposed at G3 axis which has not been still converted though it is a working mine.
  - There is a substantial mineralised area as shown in Surface Geological Plan yet to be proven under G1 level which should have been proven under G1 level so far. So the additional proposal for exploration need be given in the document.
  - Borehole coordinates shall be provided in mentioned plan.
  - Statuses of existing working shown on surface plan differ with the one shown on Surface Geological Plan (Please check status of working along boundary lines DE, EF & FG).
  - Contours are not properly demarcated which is base for calculating the sections in Surface Geological Plan.
  - Trenches/pits for exploration wherein described in the text is not demarcated in Surface Geological Plan.
- 40) Sections for Surface Geological Plan, Plate No. 5:
- Sections for Surface Geological Plan are incorrect and mismatched with respect to contours and features with Surface Geological Plan (Plate No.4).
  - On section lines 1-1' along-with mineralisation under 111, there is coding of mineralisation under 211,122 & 211 needs review.
  - No mineralization, Inter-burden, waste is shown in sections. Sections are devised to conceptual/UPL benching to assess mineable reserves
  - Section 10-10', 11-11', 12-12' are technically wrong.
- 41) Plate No. 6-10, development plans, Haul road is not demarcated.

- 42) Conceptual plan, Plate No. 11:
  - a. Conceptual Sections do not match with Conceptual Plan
  - b. Conceptual Plan is not correct; access route from surface ground level upto the pit bottom is not given.
  - c. No haulage road is given in conceptual plan and the proposals are practically to be feasible.
- 43) Plate No.13, location for dump re-handling is not shown in either reclamation plan or conceptual plan.
- 44) Plate No.14, Environment Plan is not as per Rule 32(5)(b) of MCDR 2017, important features i.e. outside mining lease area especially just adjacent to ML area are not shown.
- 45) Plate No. 15, Financial Assurance plan is incorrect, existing broken up area and additional broken up area have not been depicted in the plan.
- 46) Plate No. 15, Area put to use shall be recalculated and all the area in put to use is not covered, accordingly FA be calculated afresh.
- 47) Elevation of Highest and lowest mRLs are mismatched with previous SOM.
- 48) From third year mine development plate to conceptual plan, provided Index is not matched with demarcations, especially in contradiction to conclude the demarcation of proposed boreholes.
- 49) In all the plates, the mine name is written as Dundu Magnesite, Soapstone & Dolomite Mine but as per text provided it is mentioned only Dundu Magnesite Mine which has to be clarified.

**General:**

- 50) The mine is located in hill slope of the high altitude mountainous terrain susceptible for seismic, other ground movement and within 50m to PWD road/human settlements. 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 mint to outside.
- 51) Document is deviating with guidelines issued by IBM ensuring proper documents for systematic mining proposal for mineral conservation and environment protection.
- 52) All the plates should be attested by qualified person, Surveyor, for their authenticity and shall be self-certified that plans and sections are based on the lease map authenticated by the State Govt.
- 53) All the annexure should be attested by qualified person for their authenticity.
- 54) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 55) There are several typographical mistakes which required to be corrected.
- 56) 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.

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

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