Email/Post

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-3/95-DDN

देहरादून , दिनाक16-03-2021

सेवा में/ To : श्री के पी गुप्ता,

c-1601, ला लागूने अपार्टमेंट्स, सैक्टर-54,

गुड़गाँव, हरयाणा-12201

e-mail:kailashguptha39@yahoo.com

विषय/Sub : 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 Baldhwa Limestone Mine, M/s Jai Singh Thakur & Sons, Mining lease over an area of 12.38 hectares located near Village-Baldhwa, Tehsil-Paonta Sahib, District-Sirmour, Himachal Pradesh State submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 -Reg

संदर्भ/Ref. : Letter from Mining lease holder vide No.Nil dated 15.02.2021 received this office dated 22.02.2021

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 22.02.2021. 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 intial/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,

16.03.2021

(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- M/s Jai Singh Thakur & Sons, 119/10, Devinagar, Paonta Sahib, District-Sirmour, HP-173025 (akchhabra2005@yahoo.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 Baldhwa Limestone Mine, M/s Jai Singh Thakur & Sons, Mining lease over an area of 12.38 hectares located near Village-Baldhwa, Tehsil-Paonta Sahib, District-Sirmour, Himachal Pradesh State submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2021-22 to 2025-26(up to 28.11.2025).

1) Cover page:
    a. Review and Updation of Mining Plan with PMCP shall be submitted under rule 17(2) of Minerals (Other than Atomic and Hydro-Carbons Energy Minerals) concession rule 2016 but on cover page and elsewhere rule 17(1) is mentioned, which is wrong.
    b. Category is given is incorrect **elsewhere in the document**.
    c. Lease area as per renewal lease deeds and supplementary lease deed is found not in conformity with the area mentioned in hectares i.e. for 12.38 hectares and give in bigha.
    d. Lessee name is not matching with renewal of lease deed.
2) On Page No.03, It is stated that on curtailment of lease area from 12.38 ha to 4.91ha during second renewal vide letter dated 20/12/2006(period from 29.11.2005 to 28.11.2025), recovery of high grade mineral from depth became infeasible resulting IBM interrupted into the matter with State Govt. and finally State Govt. include left out area again for propoer utilization/exploitation of available mineral deposit vide letter dated 03/01/2009. Thus there was a need to prepare a mining plan for renewal of an area of 12.38ha which is not clear from the document, need be clarified.
3) On Page No.06, conversion factor from bigha to hectares has to be given in justification of area given in mining plan.
4) On Page No.07, it is mentioned that copy of **DILR map** is enclosed at annexure No.11A which is not found.
5) Lease Co-ordinates are not matching with the co-ordinates mentioned in previously approved modified mining plan. Authentication of lease coordinates on khasra map by State-DGM is not found enclosed.
6) On Page No.08, The nearest Railway station is Dehradun not Shimla as mentioned and State Capital to be corrected.
7) On page No. 10, the compliance position for Exploration is not justified properly. Reason for deviation is not given. Besides extent of Mining, Similarly on same page rejects generated to the tune of 81500 are indicated. Whereas remarks are not matching with the figures given. Location of such huge quantity of rejects is also not found in Surface plan.
8) On Page No.10, Para 3.5, details of suspension/closure/prohibitory orders shall be given for entire plan period.
9) Proposed exploration is not indicating, covering of back log, if any. Mineral rejects is to be defined categorically, wherever used.
10) On Page No.14, It is revealed from the analysis report that Cao content in limestone ranges from 48.10% to 56.12% and in a case total content including Loss of Ignition goes up to 100.56% which does not appear correct, necessary correction may be required.
11) On Page No.21, Reserves are not given in million tonnes. Similarly summary of reserves under UNFC code as on 1.2.2021 is not given.
12) On Page No.21, Dolomite is given which is not evident in lease deed/supplementary lease deed.
13) On Page No.22, Depletion of production upto January 2021 is to be given. Thus reserves under 111 category to be calculated afresh.
14) On Page no.23-35, Sectional areas under 221, 222 and 331 are not matching with sections drawn. Similarly sectional areas considered under 332 are not correct.
15) On Page no.23-35, Sectional area for reserves under 111 category are incorrect. It should be drawn a fresh.
16) On Page No. 36, 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 carried out G1 level exploration as proposed in modified mining plan and also area mentioned under G-1, G-2 & G-3 is found incorrect. Proposal for compliance of Rule 12(4) is to be given essentially.

17) On Page No.37, table 45, please define the provided grades of precisely.

18) On Page No.37, earlier there was Reserves under 111 only whereas in this re-estimation the Reserves under 111 category found drastically reduced which may be reviewed or justified.

19) On Page No.37, Life of Mine is not found correlated with R&R. justification for mineral depletion at the expiry of mine lease is not appearing a technical narration which needs to be reviewed.

20) On Page No.38, excavator and JCB bucket capacity is not realistic with proposed production rate. May be reviewed.

21) On Page No.38, face angle shall be mentioned. Overall pit slope is given is not appearing correct.

22) On Page No.40, at the final year, end date of expiry of lease shall be given.

23) On Page No.40, location for stacking of mineral reject has to be provided.

24) On Page No.42-47, Bench RL mentioned on page 43 i.e. 1750-1476 is arbitrary. The same is to be corrected. Similarly bench RL mentioned on page 44 i.e. 1737-1737, 1746-1744, 1738-1737 are arbitrary. Review all year wise development proposals in respect of Bench RL, surface area, depth, road; and volume etc aligned with HEMM dimensions accordingly. Entire production proposals and surface area is to be re drafted. It appears Qualified person has prepared it in a very casual manner.

25) On Page No.42, Coordinates mentioned on page 42 requires to be rechecked.

26) On Page No.47, production for fifth year i.e.2025-26 shall be given on pro-rata basis.

27) On Page No.48, table 55, waste+IB is given '0' quantity which shall be reviewed with respect to year-wise development tables

28) On Page No.49-50, Conceptual mine planning is not adequately dealt which shall be reviewed and redrafted in tabular format. Conceptual plan is not matching with pit design parameters and adequacy of HEMM. Indicated maximum and minimum depth of working is not matching with development plan. Review the proposals

29) On Page No.50, Life of mine anticipated is not correct. Entire table shall be reviewed.

30) On Page No.51, Average ground level mentioned is not correct. It is around 1710 mRL as per field conditions.

31) On Page No.54, The waste/mineral reject to be generated has to be proved of non existence of mineral and no waste is evident in geological sections. This proposal is in violation of Rule 14 of MCDR 2017. However, proper/appropriate dimensions of stacking of waste/mineral reject shall be provided.

32) On Page No.55, dump parameters are not given and adequately dealt.

33) On Page No.55, can the angle of repose be maintained, please review.

34) On Page No.56, under chapter use of mineral, name of consuming industries requires to be given.

35) On Page No.61, under employment chapter, part time mining engineer and geologist are given. It is to mention that it is an A category mine. Thus full time deployment of mining engineer and geologist should be there.

36) On Page No.62, PMCP land use pattern as per revenue details like forest, Gochar (pasture), agriculture etc of ML area is missing. It shall also be given as an abstract of type of land out of total revenue details of the area. And also area under waste dump, infrastructure is not correct.

37) 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.

38) As the lease is going to be expired in the proposed plan period, adequate closure activities and dump management, PMCP proposals w.r.t reclamation and rehabilitation shall be incorporated.

39) Being the hilly terrain suitable fencing proposals are not given in PMCP at para 8.3

40) Action of cumulative result on PMCP till date to be given. Give the execution of earlier proposals so far separately.

41) On Page No.65 & 81, additional area to be required under mining is less anticipated with respect to production.

42) On Page No. 72, blasting monitoring is not given.

43) On page No.82, area considered for calculation is not matching. Entire FA calculation to be reviewed.

44) Details of Bank guarantee to be mentioned at the time of final submission.

45) Proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco sensitive zone.

46) 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.

47) All the proposals should be made within ML only.

48) Mines Act 1952 is repealed thus refer to proper Statutory Act to be given.

49) EC capacity & its documents have to be enclosed.

50) Feasibility report has not been enclosed.

51) 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 North-west direction as per mine topography.

52) 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 as the lease is about to expire in the proposed plan period.

Plates:

53) 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.

54) 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.

55) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.

56) Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.

57) Key Plan, Plate No.1A

   a. Topo Sheet No. of the lease area not indicated on plan.

58) Surface Plan, Plate No.2:

   a. Maximum and minimum levels of the mining lease may be provided
   b. Some of the Surface features are missing along the mining lease boundary.
   c. Excavation/dump is found beyond the 7.5 statutory boundary which shall be reviewed.
   d. Land use pattern of the lease area are not shown on plan.
   e. Name of GCP-1 is not marked on the plan.

59) Surface Geological Plan, Plate No.3:

   a. Borehole coordinates shall be provided in mentioned plan.
   b. Statuses of existing working shown on surface plan differ with the one shown on Surface Geological Plan.
   c. Boreholes are proposed in existed pit which is not necessary and shall propose at G-2 & G-3 axes.
   d. Level and area of exploration on G-axis shall be demarcated.
   e. Excavation observed beyond ultimate pit limt.
   f. Dolomite is given in R&R estimation is not evident.

60) Sections for Surface Geological Plan, Plate No. 3A:

   a. Nowhere OB/waste is shown
   b. Sections for Surface Geological Plan are incorrect and mismatched with respect to contours and features with Surface Geological Plan (Plate No.3).
   c. More sections on geological plan showing UPL shall be given.
   d. Proper benching is not evidenced.
   e. Dump is not demarcated at section lines HH' and II' as shown in SGP.

61) Plate No. 4A-4D, year wise development plans access road for proposed mining is not demarcated and proposals.

62) Plate No.4E, sections for development plans are not correct. Sections depicting year wise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.

63) Plate No.05, PMCP proposals are not adequately demarcated with respect to lease expiry period.

64) Plate No.06, Environment Plan is not as per Rule 32(5)(b) of MCDR 2017, important features i.e. outside mining lease area.

65) Conceptual plan, Plate No. 7:

a. On conceptual plan bench configuration is mismatching with present existing pit position and the mine design parameters are also not found reflected through this plan and section. Adequate sections are not given. It has impact on calculation of R&R and thus it is to be drawn carefully & should be implementable

b. Conceptual Plan is not fulfilled in consideration of mineral conservation point of view; access route from surface ground level upto the pit bottom is not matching with existing profile.

c. No haulage road is given in conceptual plan and the proposals are practically to be feasible.

d. On conceptual plan, existing plantation is not reflected.

e. Beyond UPL, excavation is observed thus UPL may be reviewed.

f. Adequate sections are not given. The mine design parameters are also not found reflected through this plan and section.

g. Elevation of Highest and lowest mRLs are not given in conceptual plan

66) Plate No. 08, Financial Assurance plan is incorrect, additional broken up area in the plan is not realistic and absolutely not matching with proposed development plans.

67) Plate No. 08, Area put to use shall be recalculated and all the area in put to use is not covered, accordingly area put to use for FA be calculated afresh.

General:

68) The mine is located in hill slope of the high altitude mountainous terrain susceptible for seismic, other ground movement and within buffer zone 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.

69) Proposals for development of pit through proper benching in particular at end of lease expiry period i.e. in this proposed mining plan period 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)

70) Document is deviating with guidelines issued by IBM ensuring proper documents for systematic mining proposal for mineral conservation and environment protection.

71) 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.

72) 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.

73) All the annexure should be attested by qualified person for their authenticity.

74) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.

75) There are **several typographical mistakes/casual approach** is observed which requires to be corrected.

76) 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.

77) 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.

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

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