



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-210/05-DDN

देहरादून , दिनांक 15-03-2021

सेवा में/ To : श्री के पी गुप्ता,

e-mail:kailashguptha39@yahoo.com

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

गुडगाँव, हरयाणा-12201

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 Bhimgoda Limestone Mine, Smt.Satya Tomar, Mining lease over an area of 8.50 hectares located near Village-Kamroo, 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,

(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- Smt. Satya Tomar, 195/4, Adarsh Colony, Badripur, Paonta Sahib, District-Sirmour, HP-173025 (ashoktomar50@gmail.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 Bhimgoda Limestone Mine, Smt.Satya Tomar, Mining lease over an area of 8.50 hectares located near Village-Kamroo, 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.

- 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 rule 17(1) is mentioned, which is wrong.
  - b. Category is given is incorrect elsewhere in the document.
  - c. Mentioned act is given is incorrect.
- 2) On Page No.04, Lessee's address is not matching with provided supplementary lease deed
- 3) On Page No.05, Mining lease address is not matching with provided supplementary lease deed.
- 4) On Page No.06, 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.07, Plate no. of key plan is not matching with enclosed plate and index of the document.
- 7) On page No. 09, Para 3.3(a) of 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 Modified Mining plan. Compliance position of Exploitation, year wise Mine development, Reclamation/Rehabilitation and afforestation is not substantiated as per provision of rules. Besides extent of Mining, dumping is seen outside mining lease area towards east direction near Pillar B.
- 8) On Page No.17, provision of rules under MCDR 2017 shall be incorporated and prepare surface and surface geological plans accordingly.
- 9) On Page No. 19, 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 and G-2 is found incorrect.
- 10) On Page No. 24 and 30, Reserves of 1.044 million tonnes (low grade) and 3.807 million tonnes (High grade) were indicated under 111 category in the previously approved modified mining plan. Whereas, in the present submission, reserves under this category are indicated as 0.487 million tonnes ((High grade) and 0.050 million tonnes. Justification for the drastic exhaustion of reserves without carrying any exploitation and exploration in realistic approach is not found provided. Thus reserves need to be estimated afresh including life of mine calculations at Page no.30 accordingly.
- 11) On Page No.31, Mineable reserves under 111 shall be considered for mining whereas it is found incorrect and proposed production at the rate of 1,25,000 metric tonnes is on higher side in comparison of mineable reserves.
- 12) On Page No.31, proposed year-wise limestone production is not matching with EC at annexure No.6. In fact, nowhere any justification for enhancement of production against EC is also found.
- 13) On Page No.31, proper justification for considering of 8 pits without any systemic and scientific manner of pit design parameters is not found. Review the fact for actual no. of pits with dimensions along with appropriate proposals.
- 14) On Page No. 34, pit design parameters, especially bench width, haul road width, face angle and overall pit slope is not synchronized with number of pits. The overall pit slope is not realistic w.r.t design parameters.
- 15) On Page No. 34-38, in table of In-situ Tentative Excavation, during plan period, proposed production of ROM of limestone is exceeded with mineable reserve (111) which is absolutely not correct. **Gross planning lacuna is observed.**
- 16) Pit dimensions mentioned in the text and plates are arbitrary. Fresh survey requires to be carried out and also give the bench mark pillar details (of atleast 2) with geo-referenced latitude-longitude along with RL.

- 17) Total Mining chapter shall be reviewed in respect of pit design parameters (pit & bench wise), production as per mineable reserves (under 111 category) and aligned with HEMM dimensions accordingly.
- 18) Total Conceptual plan proposals are completely arbitrary with respect to Bench profiles of proposed development plan & conceptual plan is not matching with pit design parameters and adequacy of HEMM and rate of production aligned with EC. Indicated maximum and minimum depth of working is not matching with development plan. Review the proposals.
- 19) On Page No. 46, the waste/mineral reject to be generated has to be proved of non existence of mineral. This proposal is in violation of Rule 14 of MCDR 2017. However, proper/appropriate dimensions of stacking of waste/mineral reject shall be provided.
- 20) On Page No.48, under chapter use of mineral, name of consuming industries may also be given.
- 21) On Page No.49, It is mentioned that rock breaker is being used inside the lease area. This is not correct/true fact. The lessee does not have any rock breaker as per details given in HEMM.
- 22) On Page No.49, Irrelevant facts are mentioned on page 49 i.e. availability of LD grade in the lease area.
- 23) On page 51 use of water is indicated. The lease area is devoid of any water source. Further insignificant plantation has been carried out by the lessee. The facts mentioned on page 52 are arbitrary. Actual facts need to be mentioned.
- 24) On Page No.54, 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.
- 25) 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.
- 26) Being the hilly terrain suitable fencing proposals are not given in PMCP at Para 8.3
- 27) Action of cumulative result on PMCP till date to be given. Give the execution of earlier proposals so far separately.
- 28) On Page No. 58, additional required area under mining is not realistic with respect to proposed production and area given in mining chapter. Review it.
- 29) On Page No.75, Details of Bank guarantee to be mentioned at the time of final submission.
- 30) Bulk density is considered as 2.7 in annexure, whereas tonnage factor is calculated as 2.5 which shall be reviewed.
- 31) Proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco sensitive zone.
- 32) 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.
- 33) All the proposals should be made within ML only.
- 34) 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.
- 35) 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:**

- 36) 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.
- 37) 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.
- 38) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
- 39) Location map is not found enclosed.
- 40) Surface Plan, Plate No.2:
  - a. Maximum and minimum levels of the mining lease may be provided

- b. As per text, there are two magazines falls in the mining lease area whereas in the provided surface plan it is not found demarcated.
  - c. Some of the Surface features are missing along the mining lease boundary.
  - d. The plantation done so far is not shown/ evident.
  - e. Excavation is found beyond the 7.5 statutory boundary which shall be reviewed.
- 41) Surface Geological Plan, Plate No.3:
- a. There is proposal of six bore holes to be put on existing pit bottom to ascertain the mineralisation in depth. It is evinced that bore hole No.1, 3, 4 are proposed at adjacent to mining lease boundary which is not required.
  - b. Borehole coordinates shall be provided in mentioned plan.
  - c. Statures of existing working shown on surface plan differ with the one shown on Surface Geological Plan.
  - d. Trenches/pits for exploration wherein described in the text is not demarcated in Surface Geological Plan.
  - e. Area under G-axes shall be demarcated.
  - f. UPL be given on SGP
- 42) Sections for Surface Geological Plan, Plate No. 3A:
- a. Sections for Surface Geological Plan are incorrect and mismatched with respect to contours and features with Surface Geological Plan (Plate No.3).
  - b. In all sections, whether benches or ultimate pit is demarcated in G-2 axis shall be clarified.
  - c. Proper benching is not evidenced.
- 43) Plate No. 4A-4D, year wise development plans, Most of the proposals are under 221 categories which is objectionable.
- 44) Plate No. 4A-4D, year wise development plans, access road for proposed mining is not demarcated and proposals for first, fourth, & fifth years are not realistic and scientific in terms of pit design parameters. Proposals are evident beyond statutory boundary in fourth year.
- 45) Plate No.4E, sections for development plans are not correct. Sections depicting yearwise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.
- 46) Plate No.06, 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 and adjoining mining lease shall be demarcated.
- 47) Conceptual plan, Plate No. 7A:
- 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 absolutely not correct; 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
- 48) 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.
- 49) 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.
- 50) Elevation of Highest and lowest mRLs are not given in conceptual plan.

**General:**

- 51) 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.

- 52) Proposals for development of pit through proper benching in particular at 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)
- 53) Document is deviating with guidelines issued by IBM ensuring proper documents for systematic mining proposal for mineral conservation and environment protection.
- 54) 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.
- 55) 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.
- 56) All the annexure should be attested by qualified person for their authenticity.
- 57) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 58) There are several typographical mistakes which required to be corrected.
- 59) 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.
- 60) 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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