



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-135/2000-DDN

देहरादून, दिनांक 13-03-2021

सेवा में/ To : Deepak Gaur,
C-303, Swagat Rainforest-II
Opp. Swami narayan Dham,
Kudasan, Gandhinagar (Gujarat)-382421

email:dgaur@mining360services.com

विषय/Sub : Submission of Review and Updation of Mining Plan with Progressive Mine Closure Plan in respect of Jhiroli Magnesite Mine, M/s Almora Magnesite Limited, Mining lease over an area of 165.086 hectares located near Village-Jhiroli, Tehsil-Kafligair(Matela), District-Bageshwar, Uttarakhand State submitted under 17(2) of Minerals (Other than Atomic and Hydro Carbons Energy Minerals) Concession Rule, 2016 & Rule 23 of Mineral Conservation and Development Rules-2017-reg

संदर्भ/Ref. : Letter from Mining lease holder vide No. AML/HO/MD/2021/16 dated 25.02.2021 received this office dated 01.03.2021

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 01.03.2021. 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.

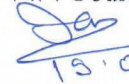
You are advised to correct the submitted intial/draft RMP by addressing the discrepancies/deficiencies appropriately and carry out necessary/required modifications and submit the mining plan afresh in **3 fair copies** within **15 days** from the date of issue of this letter in hard bound copies (no 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,


13.03.2021

(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 Almora magnesite limited, village-Matela, PO-Billori, District-Bageshwar, Uttarakhand -263630 (almoramagnesite@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 Jhiroli Magnesite Mine, M/s Almora Magnesite Limited, Mining lease over an area of 165.086 hectares located near Village-Jhiroli, Tehsil-Kafligair(Matela), District-Bageshwar, 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) 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 **elsewhere in the document**, which is wrong.
 - b. Category is given is incorrect **elsewhere in the document**.
- 2) On Page No.10, Authentic lease plan with all the Khasra details of the villages including Khasra plan/map duly verified by Geology & Mining department of State Govt. showing the location of the lease area with DGPS coordinates of boundary pillars has not been enclosed.
- 3) On Page No.10, lease area varies with the admeasuring area by given coordinates which shall be reviewed.
- 4) On Page No.13, OB has been evident during field inspection, whereas nil is shown in actual quantity throughout previous plan period which is incorrect. Whereas remarks are not matching with the figures given. Location of such quantity of rejects is found in Surface plan
- 5) On Page No.16, deviation for year wise proposals against actual is not addressed in respect of erection of retaining walls and check dams.
- 6) On Page No.16, it is mentioned that no violation letter has been issued during plan period which is not correct. Mention the all violation of rules and their compliance status invariably.
- 7) On Page No.24, base for the determination of bulk density is not found enclosed.
- 8) On Page No.26, Location of proposed boreholes is not indicated.
- 9) On Page No.28, Table 5, level of exploration done in mineralized and non-mineralized area in the mining lease is not given.
- 10) On Page No.29, quantity of mineral considered for life of mine is not matching with proved mineral reserves (111 category) at page No.28. **Life of mine is anticipated incorrect**. Entire table shall be reviewed.
- 11) Present extent of ML area under various G-axis is not given. Further area which is mineral potential but not under G-1 then it should be proposed for further exploration as per rule 12(4) of MCDR 2017.
- 12) On Page No.30, overall pit slope and Ramp gradient is arbitrary, face angle shall be provided.
- 13) On Page no.30, are primary & secondary crushers located in the lease area?
- 14) On Page No.31, drilling machine of 115mm ϕ is given in HEMM table but nowhere blasting proposed with 115mm ϕ drill hole which may be reviewed.
- 15) On Page No.33, conversion factor for magnesite, limestone & dolomite is given shall be proved scientifically.
- 16) On Page No.33, please define overburden and waste precisely.
- 17) On Page No.33, proposals for stripping ratio are envisaged is unrealistic with respect to ground reality which shall be reviewed.
- 18) On Page No.33, limestone extraction/production is envisaged which is not discussed in R&R.
- 19) On Page no.33, Para 2, is not proper and tenable.
- 20) On Page No.34-38, year wise, OB bench wise proposals shall be given,
- 21) Sectional areas are not-realistic with respect to pit design parameters. RoM is to be given in cum also as per guidelines.
- 22) Review all year wise development proposals with respect to OB development parameters, mineral wise excavation and optimum pit dimensions.
- 23) Lease holder intends to mine limestone and dolomite as minor mineral but not given in the R&R an no excavation plan is given.
- 24) On Page No.41-43, 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.
- 25) On Page No.42, Life of mine is anticipated incorrect which shall be reviewed.
- 26) On Page No. 46, Para "waste.....burden dump" itself is contradictory with respect to handling of OB.
- 27) On Page No.48, purpose/objective and design along with construction details shall be incorporated in PMCP chapter.

- 28) 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.
- 29) On Page No.50-51, limestone production is envisaged in this plan period. Although a captive mine nowhere handling of limestone mineral is discussed with respect to separate stacking/use of mineral etc.
- 30) On Page No.55, under employment chapter, mining engineer is not given.
- 31) On Page No.56, 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.
- 32) On page No.60, land use pattern is indicated. Area under mining comes to less than one hectare. As per planned production it comes nearly 1.2 hectares.
- 33) On page No.60, it is mentioned that production proposals are proposed in virgin land. The reason is not adequately explained.
- 34) 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.
- 35) Impact assessment at Para 8.2 is not adequate.
- 36) On Page No.68 and onwards, being the hilly terrain The PMCP details with respect to retaining wall/parapet wall/ check dams/fencing is not matching and not found appropriate at Para 8.3
- 37) As the mine is a running mine, PMCP proposals should cover green belt development along ML area.
- 38) Air, water, vibration monitoring and its stations are not proposed in Para 8.3.
- 39) Precautions to be taken to keep the ground vibration and Air over pressure under control/ permissible limit are not adequately dealt. Proper monitoring proposals are missing.
- 40) Every blast shall be monitored for ground vibration and AOP.
- 41) Details of Bank guarantee to be mentioned at the time of final submission.
- 42) Proposal for daily monitoring of ground vibration / AOP due to blasting is not discussed which shall be incorporated in mining plan being the area eco sensitive zone.
- 43) On Page No.76, Total net area considered for calculation is lesser than previous period which is incorrect and financial area assurance calculation is to be rechecked. Additional area required during plan period is to be calculated again. BG to be given in new format and coterminous with plan period.
- 44) 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.
- 45) All the proposals should be made within ML only.
- 46) Feasibility report has not been enclosed.
- 47) 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:

- 48) 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.
 - 49) 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.
 - 50) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
 - 51) Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
- 52) All plans are found not as per absolute scale.**
- 53) Key Plan, plate No.1A, Topo Sheet number is missing.
 - 54) Surface Plan, Plate No.2:
 - a. Contour values at regular intervals of 10m(vertical) need be marked on the plan being a hilly area for easy understanding of plans & sections Maximum and minimum levels of the mining lease may be provided.
 - b. Closed traverses with firm green lines shown on the plan should have been indexed for easy understanding of the plan
 - c. Surface plan is not depicting all surface features of ML area.
 - d. Ground control point's coordinates are not given.
 - e. The plantation done so far is not shown/ evident in SP.

- f. There is need of further indexing for understanding surface features shown on the plan
- 55) Surface Geological Plan, Plate No.3:
- a. Dip and strike of the deposit are neither appears in the plan nor same have got place in index
 - b. A thin magnesite ore body marked on the surface Geological Plan, whereas it is revealed from the Five Year Development Plan that proposal of working is given far a distance from the ore body. Thus there are need of number of slice plans at least at every alternate bench level of 20m for better planning purpose.
 - c. Viability of extraction of Magnesite ore in depth particularly area from where section lines 1-1', 2-2' and 3-3' passes may be explored as in this area as magnesite of substantive quantity may be recovered by removal of little overburden.
 - d. Borehole coordinates shall be provided in mentioned plan.
 - e. Statures of existing working shown on surface plan differ with the one shown on Surface Geological Plan.
 - f. Boreholes are proposed in existed pit which is not necessary and shall propose at G-2 axis.
 - g. Level of exploration on G-axis is not given on SGP. All 4 axis shall be explicitly marked on surface geological plan.
 - h. Level and area of exploration on G-axis shall be demarcated.
 - i. Excavation observed beyond ultimate pit limit.
 - j. Ultimate pit limit is not adequately designed.
- 56) 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. More sections on geological plan showing UPL shall be given.
 - c. Proper benching is not evidenced.
- 57) Plate No. 4A-4E, year wise development plans and sections, OB benches are not demarcated on both plans and sections.
- 58) Plate No. 4A-4E, year wise development plans and sections, access road for proposed mining is not demarcated and proposals.
- 59) Plate No. 4A-4E, year wise development plans and sections, Plans are prepared on a scale of 1:2000 showing entire area. Area under consideration is a hilly terrain resulting contours are in close proximity. So the presentation of bench parameters on the plan are clumsy even not readable. Therefore there is a need to prepare year wise Development plans for an areas under proposed mining and allied activities on a suitable scale so that the Development plans speak about all the proposed activities with clarity. Beside this a composite development plan may also be enclosed with the document
- 60) 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.
- 61) Plate No.05, PMCP proposals are not adequately demarcated with respect to lease expiry period.
- 62) Wind direction is not given in reclamation plan and height of the dumps is not found given.
- 63) Plate No.06, Environment Plan is not as per Rule 32(5)(b) of MCDR 2017, On environment plan many features to be shown beyond ML area is not shown.
- 64) 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
- 65) 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.

- 66) Plate No. 08, it is revealed from the plan that additional area shown on the plan mismatches with the one shown on Proposed Development Plan of 5th year(Plate No. 4E) . For example deviations noticed between grid 378800 - 378900 and 3293700-3293800. So there is a need to update the plan carefully
- 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.
- 68) Plans and sections are not bearing the standard certificate that plans and sections are based on lease plan authenticated by the state government.

General:

- 69) 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.
- 70) 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)
- 71) Document is deviating with guidelines issued by IBM ensuring proper documents for systematic mining proposal for mineral conservation and environment protection.
- 72) 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.
- 73) 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.
- 74) All the annexure should be attested by qualified person for their authenticity.
- 75) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 76) There are **several typographical mistakes/casual approach** is observed which requires to be corrected.
- 77) 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.
- 78) 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.

