



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 MINES100, ओल्ड नेहरू कालोनी, देहरादून (उत्तराखंड) 248001 / 100 Old Nehru Colony,
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फाइल संख्या File No: 614(2)/MP-A-175/0

दिनांक 28.11.18

सेवा में To	जी.एन.चौधरी Mr. G.N. Chowdry, QP 17-Iqbal Colony, Chanapora, Srinagar J&K
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विषय/ Sub : Submission of review and updation of Mining Plan with Progressive Mine Closure Plan in respect of Saman limestone mine over an area of 144.25 Hectares near village Saman, Tehsil- Panthachowk, District- Srinagar, State-Jammu & Kashmir of M/s Saifco Cements Pvt Ltd. submitted under Rule 17 (1) of Minerals (Other than Atomic And Hydro Carbons Energy Minerals) Concession Rule, 2016 & 23 of Mineral Conservation and Development Rules-2017

संदर्भ/Ref. : Your letter No. 786/10/3227 dated 12.10.2018 received on dated 09.11.18

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Review and Updation of Mining Plan including Progressive Mine Closure Plan on 09.11.18. On examination of the same the discrepancies / deficiencies observed have been listed in annexure.

You are advised to correct the submitted Mining Plan including Progressive Mine Closure Plan as per deficiencies /discrepancies pointed in the enclosed annexure as scrutiny comments and submit 3 fair copies of the Mining Plan including Progressive Mine Closure Plan within 15 days from the date of issue of this letter after corrections in hard bound copies (no spiral binding). If the fair copies of Mining Plan including Progressive Mine Closure Plan will not be submitted within stipulated time, final action will be taken as per rule. Two CDs of the fair Mining Plan including Progressive Mine Closure Plan may also be submitted including text, plates and annexures. On receipt of additional comments from State government, it shall be communicated to you subsequently. In case if it is necessary to incorporate the additional information, the details of the same should be given along with page numbers.

You are further advised to prepare the fair copies carefully and ensure that it is correct in all respect. Preferably use of paper on both the side should be made. 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.

(य) Yours faithfully,
28/11/18

(पुष्पेंद्र गौड़ Pushpender Gaur)
DCOM & Officer In Charge
भारतीय खान ब्यूरो Indian Bureau of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर।
- 2- Mr. Saif-U-Din Gunna C/o M.A. Guna, M/s Saico Cements Pvt. Ltd. Opposite Post Office, Batwara, Distt- Srinagar-190004 (J&K)
- 3- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, एनसीआर, सीजीओ कॉम्प्लेक्स, नई दिल्ली।

Sent by mail on
28/11/18

(य)
28/11/18
DCOM & Officer In Charge
भारतीय खान ब्यूरो Indian Bureau of Mines

Scrutiny comments indicating deficiencies in respect of submitted Review and update of Mining Plan with PMCP of Saman limestone mine of M/s Saifco Cements Pvt. Ltd. (144.25 hect.) in Srinagar district of J&K State submitted under Rule 17(1) of MCR 2016 & 23 of MCDR 2017.

1. On cover page the lease period is not correct and not matching with lease deed.
2. On cover page the lease execution date is not correct as per lease deed. Similarly on cover page the lease period is shown upto 50 years as per amended MMDR. However, copy of the State government is not enclosed.
3. Lease area on consent letter is incorrect.
4. On cover page specify the month for proposal period 2018-19 as most of the commencement plan period is over.
5. ID of lessee is not enclosed.
6. Legible copy of Annexure 4 to be enclosed.
7. English translation of annexure 3 to be given.
8. As per lease deed, the lease is located at Saman, Khonmoh whereas on cover page it is written as Saman Khounmoh.
9. On page 2 Status of lessee is given as private limited company which is not correct as per lease deed.
10. (a) On page 3 name of lease holder is given as M.A.Gunna. Give supporting documents if any in this regard.
- 10(b); Authenticatd lease corner points, DGPS coordinates authenticated by the State Govt should be submitted in original. It should be of the latest date.
11. On page 6, excess production for the year 2013-14 is indicated than proposed. On similar page cumulative plantation is given. Give year wise details.
12. On page 7, MCDR 1988 is given. Change these respective rules with extant rules.
13. RQP registration is given on the certificate which is not required.
14. In consent letter the unit of area i.e. hectare (ha) is not given.
15. More representative photographs are to be enclosed.
16. Bank guarantee shall be submitted in the revised format attached herewith.
17. On page 12 of the text it is stated that boreholes analysis is carried out by UltraTech whereas analysis is carried out by Ultra Testing & Research laboratory.
18. Reserves and resources from previously approved scheme of mining have not been shown.
19. No depletion has been shown and thus reserves need to be reassessed with updation. Face length indicated on page 15 is also not matching with the pit configuration.
20. Assignment of UNFC codes in geological section are incorrect
21. Based on the sections R&R calculated are incorrect. Mineable reserves indicated need to be reassessed. Also recalculate the life of mine.
22. Proposed boreholes are inadequate in view of Rule 12(4) of MCDR 2017.
23. On page 19, area under different axis is given in square meters. It should be in hectares. Total should also be given for quantity.
24. Reserves and resources section wise at page 22-24 are not matching with sections.
25. On page 24, B1, B2 and B3 are given. What B1, B2 and B3 stands for to be specified.
26. On page 26, Capacity for DTH is given. Give FAD .
27. On page 27, blasting pattern is not correctly defined.
28. Capacity of delays not given. Precise and specific proposals for blasting/delays be given.
29. Every blasting monitoring proposal is not given.
30. On page 30, mine is indicated as other than fully mechanized. It is a fully mechanized mine.
31. On page, 35 horizontal drilling is given. Why and where this shall be carried out.

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32. On page 36, 300 working days are shown. Considering rains and snow fall in the area, it is to be reviewed.
33. 500 litre capacity water tanker is proposed which is too less.
34. There are lot of conflict in text with respect to given in fleet with extent of mechanization at page 26 and 27.
35. On page 40, give lease period as well as UPL under ultimate pit limit.
36. Review entire land use pattern as on date.
37. From page 31 to 34 yearwise production is indicated but production is indicated as reserves. Unit may also be indicated.
38. Production for the first year should be reduced proportionately since nearly five months are left for the FY 2018-19. Contradictory production figures are indicated for first year on page 29 and 31.
39. On page 39 year 2058 is indicated under shape and size of mining pit. This is arbitrary figure.
40. On page 40 under chapter 'rehabilitation of benches' it is mentioned that top benches from 2411mRL....The highest RL is 2372m. Thus statement is contradictory. Similarly on page 40 under head Stacking of mineral reject the sentence is not clear.
41. On page 49 under PMCP, the total area shown under mining is 5.48 hectares which is not a true fact. The mine is in operation since 1996 and the total lease area is 144.25 hectares. It is to be reviewed. Details of production since opening of mine may be indicated in support of area under mining.
42. Existing land use pattern given on page 49 is not correct. How the total area 12.8 hectares has been arrived at.
43. The actual work done in the PMCP proposals should be clear cut and to be reflected in reclamation plan, environment plan and surface plan.
44. Orientation of pit wrt conceptual mining plan is not given
45. What precaution to be taken to keep the ground vibration and over pressure under control/ permissible limit.
46. Tentative azimuth and inclination of boreholes has not been indicated.
47. As the mine is a running mine, PMCP proposals should cover green belt development along ML area / conceptual pit limits.
48. On page 39 plantation proposals are given for north eastern corner of the lease whereas on page 59 proposals are given for south east foot hill zone.
49. In the previously approved scheme of mining area put to use has been indicated as 14.21 hectares whereas on page 71 area put to use is shown as 5.48 hectares only. Further additional area indicated under mining is too less considering more than 2 lakhs per annum production. Thus calculation of financial area assurance needs to be reviewed.
50. On page 57, under reclamation plan, specific pointwise proposals should be given.
51. Green belt to be proposed all along the lease area and initial phases, the green belt to be developed in the prominent wind direction for the protection of environment.
52. On page 63, under table 8.3, reclamation plan is not matching with the proposals indicated in the table.
53. On page 70, table for area put to use is not given.

54. The mine is located on hill slope. Hence adequate proposals should be incorporated like controlled blasting techniques, erecting retaining walls, check dams, parapet walls to ensure safe and systematic mining for ensuing five years.
55. All the proposals should be made within the ML only.
56. There are several typographical mistakes which requires to be corrected.
57. All the annexures should be attested by qualified persons for their authenticity.
58. Two CDs covering the entire document and plans should be enclosed at the time of final submission. Undertaking in this regard by the qualified person should be given that the CD contains the same text & plates as submitted in hard copy.

Plates

59. Sections are not scientifically drawn to assess / estimate reserve and resources.
60. Conceptual section not given.
61. Section lines / no. of sections near actual excavation zone are insufficient.
62. Reclamation plan is not in line with PMCP proposals.
63. Surface geological Plan is not as per rule 12(4) and 33(b) of MCDR 2017.
64. Plate 9- Which portion of key plan is shown as part plan.
65. Conceptual plan- Reassess the resources / mineable reserves according to reconfiguration of benches. What geology at pit bottom and benches to be given.
66. Conceptual plan depicts steep slope. Review it as per hilly and ecologically sensitive area.
67. Mineable section is depicting nothing. No bore holes are evident. Font is also small.
68. Surface plan is not prepared as per rule 32(a) of MCDR 2017.
69. Describe all three ground control points on the plan.
70. Plate 5A- UNFC code assigned is not correct. Need to be reviewed.
71. Plate 6A- Give only one section.
72. Reclamation plan- Green belt is different from general plantation. Also show the present plantation, cumulative plantation done so far as PMCP proposals distinctly.
73. Plate 5C- UNFC code is not matching with quantity of R&R given in text.
74. Financial Area Assurance plan- Correct the name of plan. Only area put to use only be shown and nothing else.
75. Geological sections. UPL not shown as per conceptual planning.
76. One composite section shall also be given for all five years for proposed excavated area.
77. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
78. Sections depicting year wise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.
79. More sections on geological plan showing UPL shall be given.

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28/11/18