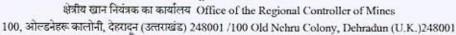


भारत सरकार Government of India खान मंत्रालय Ministry of Mines

भारतीय खान व्यूरो Indian Bureau of Mines





TEL- 0135-2676350 / 2671896, E-mail ro.dehradun@ibm.gov.in

फाईल संख्या File No: 614(2)/MP-A-216/05-DDN

दिनाक 29.11.2018

सेवा में To

श्री राकेश पुरोहित, खनन अभियन्ता,

17E/403,C,H,B.

जोधपुर-342 008 (राजस्थान)

rkconsultantsjodhpur@gmail.com

श्री एस. के. सोनी, भूवैज्ञानिक,

J3C-1, सुभाष कालोनी, गली नं. 4

Defence Lab Road,

जोधपुर-342 011 (राजस्थान)

Soni.sarnar,shailendra@gmail,com

विषय Sub:

Submission of Mining Plan with Progressive Mine Closure Plan in respect Baga-Bhalag Limetone & Shale mine over an area of 324,4790 hectares near Village – Baga, Bhalag, Samtiyari & Sehnali; Tehsil Arki District Soaln, State Himachal Pradesh of M/s UltraTech Cement Ltd (Unit: Baga Cement Works) submitted under Rule 17 (2) 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. UTCL/BBLM/IBM/2018-19/454 Dated 31.10,2018 received in this office on dated

09.11.2018

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 09.11.2018. 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 issue with the approval of competent authority.

Encl: as above.

भवदीय/ Yours faithfully

(एस.सकलानी S Saklani) सहायक खनन भूवैज्ञानिक AMG कृते प्रभारी अधिकारी For Officer In Charge भारतीय खान ब्यूरो Indian Bureau of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर।
- 2- M/s UltraTech Cement Ltd (Unit: Baga Cement Works) Village Baga, PO-Kandhar, Tehsil Arki, District Soaln H.P. -171 102 (email- ajit.ostwal@adityabirla.com)
- 3- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, कैम्प कार्यालय, शास्त्री भवन , नई दिल्ली।

al 29/11/18

सहायक खनन भूवैज्ञानिक AMG कृते प्रभारी अधिकारी For Officer In Charge भारतीय खान ब्यूरो Indian Bureau of Mines Scrutiny comments indicating deficiencies in respect of submitted Review of Mining Plan with PMCP of Baga Bhalag limestone mine of M/s UltraTech Cement Ltd (324.4790 hect.) in Solan district of HP State submitted under Rule 17(2) of MCR 2016 & 23 of MCDR 2017.

- Since mining plan is submitted under rule 17(2) of M(OHCEM)CR 2016 as it is Review and updation of previous approved mining plan thus its preparation is under rule 17(1) of M(OHCEM)CR 2016.
- 2. Authentic lease plan with all the Khasra details of the villages 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. 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.
- Name of lessee shall be as per updated/ extant lease deed documents. NO additional name/detail to be added randomly.
- Address of lessee is not given as per guidelines at page 13.
- 5. On page 13, Arki is shown as Taluka. In Himachal Pradesh it is Tehsil not Taluka.
- 6. On page 15, under villages covered Sehnali is mentioned. As per grant letter it is Sahanali.
- On page 41 and 42 the scale is written as 2000:1. It should be written as 1:2000.
- Exploration, PMCP proposals compliance is not given at para 3.3.
- On page 47 under table A1.13 axis wise resources are given but the mineral is not indicated.
- 10. Impact of updation of reserves and resources be indicated and reason thereof.
- On page 55 under item Insitu tentative excavation, give summary of proposed yearwise mineral wise excavation.
- 12. On page 42 under item 'i' it is mentioned that a little part of the area under G1 and G2 is completely non mineralized hence borehole proposal is required. This does not convey any meaning. In case it is non-mineralized area then reason for proposing the boreholes be recorded. These bore holes are not marked on the relevant plates.
- 13. Mio. Tonne should be written as million tonnes.
- 14. On page 46 it is mentioned that at present the raising cost is calculated approx. Rs. 60 per tonne. This may be rechecked considering that ex mine price is Rs. 227 per tonne.
- 15. On page 102 under table existing land use pattern forest land is shown as 23.7432 hectares whereas on page 109 under table land use pattern at the end of plan period, the forest land is indicated as 21.6932 hectares and total occupied area at the beginning and at the end of plan period remains unchanged. It needs clarification/ correction. The area should have been increased considering that an additional area of 2.05 hectares is being brought under pits and quarries.

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- 16. 8.98 hectares of area has already been covered under plantation and an additional 5 hectares of area shall be brought under plantation by planting 5000 saplings during the plan period. There is every possibility that Plantation shall also be taken up in the area already covered under plantation in the past as the already planted saplings are being diminished every year being the cold climatic conditions near Baga area. Thus area to be covered under plantation needs to be reassessed.
- 17. Proposals for air, noise vibration monitoring are not indicated in the table 8.3 of PMCP.
- Chemical analysis report is nearly 13 years old. Latest chemical analysis report from NABL accredited lab is not enclosed.
- As the mine is a running mine, PMCP proposals should cover green belt development along ML area. Initial proposal shall be in the prominent wind direction.
- May kindly note that there is difference in plantation(Reclamation) and green belt development
- 21. 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. The blasting proposals are not considered for approval, as the habitats/ dwellings are close to active mining area.
- 22. Being the hilly terrain suitable fencing proposals are to be given in PMCP at para 8.3.
- 23. All the proposals should be made within the ML only.
- 24. There are several typographical mistakes which require to be corrected.
- 25. All the annexures should be attested by qualified persons for their authenticity.
- 26. KML file shall also be submitted along with final submission in a soft copy with a print out which is to be placed in the text as an annexure. Print out shall preferably be given on A3 size glossy paper
- 27. 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.
- 28. Annexure- XVIII not legible.
- 29. <u>Financial Assurance</u> is to be furnished for the area put to use for mining and allied activities as per Rule 27(1) of MCDR 2017. The narrations given at page no 132 and 133, regarding non applicability of financial assurance in this case, is not tenable.

Plates

- Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
- Cadastral plan/khasra plan superimposing ML boundary with lat long coordinates should be authenticated by State government.

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- Paper can be saved by depicting actual and proposed working on part plan with suitable key plan.
- 33. Conceptual section: The profile of the ground is not shown on conceptual section plate no.
 7S. Further over all pit slope is not given it should be given in numerical values.
- 34. Conceptual plan: Profile of ultimate benches and haulage roads are not shown. May be given as part plan on suitable scale alongwith key plan. On conceptual plan, existing plantation is not reflected.
- 35. Plate 5SIII and other relevant plates- The quantity of excavation of shale may be reviewed.
- 36. Year wise working sections: Width of working benches is not appearing adequate w.r.t. height from safety and scientific mining point of view. Accordingly the working plans may be modified suitably.
- Geological sections- It is revealed that proper depiction is not marked/shown to estimate the R&R as per UNFC classification.
- 38. The plantation done so far is not shown/ evident in SP.
- 39. Location of cliffs near section line A-A' is to be rechecked and clarified.
- Financial area assurance plan is to be updated as per observation pointed out herein above regarding Financial Assrance.
- 41. Environment plan
 - a. Location of Plantation shown near 1275mRL is to be rechecked.
 - Prominent wind direction and wind rose diagram not shown in the environment plan.

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28/11/18