

भारत सरकार / Government of India खान मंत्रालय / Ministry of Mines

भारतीय खान व्यूरो / 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-261/06-DDN

देहरादून , दिनाक 13.02.2019

सेवा में/ To:

श्री पंकज पाण्डे, कन्सल्टैंट (परामर्शदाता),

sahahsahyig990@gmail.com

सहज सहयोग कन्सल्टैंट्स प्रा0 लि0, बी-1/21, सेक्टर-बी, अलीगंज,

লজনজ-226 024 (30 प्र0)।

विषय/ Sub: Submission of Modified Mining Plan along-with Progressive Mine Closure Plan in respect of Bhimgoda Limestone mine of M/s K. N. Cements over an area of 24.60 hectare in Village-Bhimgoda, Tehsil-Paonta Sahib, District -Sirmour of HP State, submitted under Rule 17(3) of Minerals (Other than Atomic & Hydro Carbons Energy Minerals) Concession Rules, 2016 & 23 of MCDR 2017.

संदर्भ/Ref.

Your letter No-Nil dated Nil received on dated 10.01.2019

महोदय/ Sir.

This office is in receipt of two copies of the above-mentioned draft Modified Mining Plan including Progressive Mine Closure Plan on 10.01.2019. 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 Modified 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 Modified 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 Modified 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.

भवदीय Yours faithfully

(एस.सकलानी S Saklani)

सहायक खनन भूवैज्ञानिक Assistant Mining Geologist कृते उप खान नियंत्रक एवं प्रभारी अधिकारी For DCOM & Officer In Charge भारतीय खान ब्यूरो Indian Bureau of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर।
- 2- मैं. के. एन. सीमेन्ट्स, द्वारा श्री नसीम खान, ग्राम व पोस्ट सतौन, वाया-पांवटा साहिब, जिला सिरमौर (हि.प्र.) (k.n.cement@gmail.com)
- 3- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, एनसीआर, नई दिल्ली।

र्देश (प्रो2)। १ वैज्ञानिक Assistant Mining Geologist

सहायक खनन भूवैज्ञानिक Assistant Mining Geologist कृते उप खान नियंत्रक एवं प्रभारी अधिकारी For DCOM & Officer In Charge भारतीय खान ब्यूरो Indian Bureau of Mines

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Scrutiny comments indicating defficiencies in respect of submitted Modified Mining Plan with PMCP of Bhimgoda limestone mine of M/s K.N.Cements (24.6) hect.) in Sirmour district of HP State submitted under Rule 17(3) of Minerals (Other than Atomic and Hydro Carbons Energy Minerals) Concession Rules 2016& 23 of MCDR 2017.

- 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.
- 2. Mine code has not been given on cover page.
- Despite of repeated instruction QP is binding the plans with the document.
- On cover page write proper rule for extension period giving the reference of supplementary deed. Lease period is not indicated.
- Details of the persons authorizing to sign such documents be given with contact details and resolution from company secretary.
- 6. Coordinates mentioned in the text are not matching with mentioned in the plates.
- 7. Page 6- Table 1- QP should provide title of table. GPS reading of what.
- No annexure is seen showing geo coordinates approved / authenticated by State government.
- Plan period for the year 2017-18 has already gone. Similarly year 2018-19 is almost over. Thus proposals should be incorporated for the next five years i.e. 2019-20 to 2023-24. No retrospective approval shall be given. Bank guarantee shall be coterminus accordingly.
- Necessary corrections shall be carried out on page 1 accordingly and other relevant pages.
- The actual work done in the PMCP proposals should be clear cut and to be marked in reclamation plan, environment plan and surface plan separately that this much work has been done till date of survey.
- 12. Highest and lowest levels are to be checked again.
- 13. Exploration proposals shall be revised accordingly as per rule 12 of MCDR 2017.
- 14. Page 11 (Para c)- Specify whether OB/waste is there or not in the lease area. If yes, what geological formation and supported with details on surface geological plan. No detail of waste is given whereas waste is mentioned in mining chapter.
- 15. Page 13- Pits are indicated. Specify whether these are exploratory pits.
- Page 17- Criteria to assess G-axis is wrong. Correct and recalculate R&R as per MEMC Rules.
- Page 19- review the R&R in line with present level of exploration, Pit design parameters/depth etc.
- 18. Page 24- Waste- no such details is evident in local geology/lease area nor evident in SGP and geological sections. It should not be arbitrary. Tentative excavation-Conversion factor and its supporting document should be evident.

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- Page 23- Give pit design parameters like bench height, width, haul road width, gradient, overall pit slope, Pit slope HW & FW separately, face angle, bench width etc.
- 20. What is the depth of jack hammer hole. Describe the drilling 2.5 m by jack hammer and available rod length. In our opinion jack hammer drilling blasting will not lead to systematic mining and sustainable as well.
- 21. CMRI report with date is not enclosed with study date also be indicated.
- 22. Page 30- Page 30- Review the area under conceptual period.
- Yearwise excavation proposals shall be revised in view of proposal period from 2019-20 to 2023-24.
- Abrupt enhancement of year wise production shall not be accepted. Accordingly
 production proposals should be revised.
- 25. Pit design parameters are not dealt systematically.
- 26. Pit dimensions mentioned in the text are not matching with the dimensions shown on the relevant plates.
- 27. Conceptual plan is not dealt adequately.
- 28. Orientation of pit wrt conceptual mining plan is not given
- What precaution to be taken to keep the ground vibration and over pressure under control/permissible limit.
- Proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco sensitive zone.
- Proposals for development of green belt development should be given initially towards prominent wind direction.
- 32. Page 35-chemical specification- In BF grade- Specification needs to be checked.
- 33. Page 37- Working days mentioned are contradictory.
- 34. Page 48- Table 8.3- Proposal for green belt development not given.
- 35. Page 50- Re calculate the area put to use. In view of observations/ scrutiny/ deficiencies pointed, the net area for FA assurance calculation may be increased. Therefore re calculate the area broken and furnish FA accordingly.
- 36. 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.
- 37. Being the hilly terrain suitable fencing proposals are not given in PMCP at para 8.3.
- 38. Use of mineral (page 32)- Name of consuming industries should be given.
- 39. All the proposals should be made within the ML only.
- 40. In general Board resolution is to be signed by the company secretary.

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- There are several typographical mistakes which requires to be corrected.
- 42. Necessary corrections shall be carried out on text and all the plates in view of change in proposal period.
- 43. All the annexures should be attested by qualified persons for their authenticity.
- 44. 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.

- 45. Excavation shows outside the lease area in almost all the plates. No proposal outside the lease area shall be considered for approval.
- Dump proposals are not shown on relevant plates.
- All the development plates shall be revised in view of proposal period.
- 48. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
- 49. GCP are not given on SP. Also give geo coordinates of such GCP on SP.
- 50. The plantation done so far is not shown/ evident in SP.
- 51. On conceptual plan, existing plantation is not reflected. Pit design parameters are not evident(H/W/slope). This will affect R&R component.
- 52. Reclamation plan- Proposal shown in UPL will not sustain after certain years, those shall be sustain upto closure period as these are part of their closure activity.
- 53. PMCP- Outside are shown on plans and sections.
- 54. Indicate prominent wind direction of environment plan correctly with wind rose.
- 55. Conceptual plan is not correct. It is not matching with the ground profile. Bench configuration is not given 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.
- 56. Reclamation plan- PMCP proposals within excavation area (within UPL) is not tenable, it will not be a part of closure activity if excavated/ removed in subsequent years prior to closure.
- 57. Environment plan is not prepared as per guide lines of MCDR 2017. Many features to be shown beyond ML area is not shown especially near pillar A to F which depicts excavation at adjacent area.
- 58. Sections depicting yearwise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.
- More sections on geological plan showing UPL shall be given.

Note- All the scrutiny points mentioned in the text and plates shall also be be attended.

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Lt: 4/2/19