



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
 100, ओल्ड नेहरू कालोनी, देहरादून (उत्तराखण्ड) 248001 / 100 Old Nehru Colony, Dehradun (U.K.) 248001
 TEL- 0135-2676350 / 2671896, FAX-0135-2674962, E-mail - ro.dehradun@ibm.gov.in

फाइल संख्या File No: 614(2)/MP-B-278/2008-DDN

देहरादून, दिनांक 13.02.2019

सेवा में/ To : श्री पंकज पाण्डे, कन्सल्टेंट (परामर्शदाता),
 सहज सहयोग कन्सल्टेंट्स प्रा0 लि0,
 बी-1/21, सेक्टर-बी, अलीगंज,
 लखनऊ-226 024 (उ0 प्र0)

sahahsahyig990@gmail.com

विषय/ Sub : Submission of Review & Updation of Mining Plan with Progressive Mine Closure Plan in respect Himalya Limestone Mine over an mine of 15.55 Hectares at Village & Post- Dadahu,, Tehsil - Renukaji, District - Simmour, State - Himachal Pradesh of M/s Gupta Associates, 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. Nil dated -Nil received on dated 21.01.2019

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Review & Updation of Mining Plan including Progressive Mine Closure Plan on 21.01.2019. On examination of the same the discrepancies / deficiencies observed have been listed in annexure.

You are advised to correct the submitted Review & Updation of 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 Review & Updation of 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 Review & Updation 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 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 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- मै० गुप्ता एसोसिएटस ग्राम एवं पोस्ट ददाहू तहसील रेनुकाजी जिला सिरमौर 173022 (हि० प्र०)
(Guptaassociates099@gmail.com)
- 3- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, एनसीआर, नई दिल्ली।

L. Gupta
14/12/19

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

Scrutiny comments indicating deficiencies in respect of submitted Review and updation of Mining Plan with PMCP of Himalaya limestone mine of M/s Gupta Associates (15.55) hect.) in Sirmour district of HP State submitted under Rule 17(1) of Minerals (Other than Atomic and Hydro Carbons Energy Minerals) Concession Rules 2016 & 23 of MCDR 2017.

1. Photo Id of lessees (partners) is not legible.
2. Lease period has been extended by the State government. Thus modified mining plan shall be submitted under rule 17(3) of MCR 2016.
3. Copy of initial lease deed is not legible. Back page of deed should also be given.
4. Annexure 11 is not as per partnership deed.
5. Annexures are not enclosed as per guide lines.
6. The name of mine is mentioned as Himalaya which is not evident from the consent letter.
7. Cover page- Address of lessee is not as per lease deed. Lease period is indicated upto 20.12.2033. Please mention the State govt. letter no. and date.
8. Page 3- Spelling of Sataun is not correct.
9. Page 5- Table 1- QP should provide title of table. GPS reading of what.
10. On page 6 it is mentioned that mining operations are suspended since 2014-15 but the reason for non submission of mining plan/SoM has not been indicated nor mentioned in subsequent relevant para.
11. On page 6 under item 3.6, the last line is not clear.
12. On page 9, location of old pits is indicated. Local Coordinates of these pits may be rechecked.
13. Highest and lowest levels are to be checked again.
14. Page 6- Para 3.3- Review of compliance of earlier approved mining plan w.r.t excavation proposals, exploration, PMCP proposals to be given. Further details of excavation if any till date be given.
15. Page 8 (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.
16. Page 10- Pits are indicated. Specify whether these are exploratory pits.
17. Please check the coordinates at annexure 5 with that given in table at page 5 of the text.
18. On page 17 pre feasibility resources are given. It should be rechecked again.
19. On page 19, reserves are indicated in tonnes while unit is million tonnes. Similar correction shall be made in the feasibility report.
20. Page 16- Criteria to assess G-axis is wrong. Correct and recalculate R&R as per MEMC Rules.
21. Page 17- review the R&R in line with present level of exploration, Pit design parameters/depth etc.
22. Page 19- Area is important for G-axis. Para c- Give details as per title of para only.
23. Page 20- 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.

28
etc
14/2

24. Page 21- 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.
25. Page 22-Waste- give proof. On similar page contradictory statement is given for sub grade. What is the depth of jack hammer hole. Pl. specify. NED/DTH- 1st line to 6th line is not clear. 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.
26. Page 24- CMRI report is not enclosed with study date also be indicated.
27. Page 25- syntax error of para be corrected. It is mentioned that ' device duly approved by Chief Inspector of Mines'- name and give details of such device.
28. Page 25- Conceptual MP- do not repeat. Only give references for DTH.
29. Page 26- Anticipated life of the mine- Review as per comments in geology chapter. Life of the mine as on should be given. On similar page under land use pattern- give total area and also indicate undisturbed area. The total is not matching with total lease area.
30. Page 27- How the area get exceeded than lease area. Dump area- What material pl. specify.
31. Page 30- From where waste comes. Item c- Quite strange statement is repeatedly given by QP.
32. Page 32- chemical specification- In BF grade silica will be less than 1.5%.
33. Page 34- Working days- Conflicting data are given. Elsewhere 300 working days are given.
34. Page 43 table 8.3- Give specific plan for green belt. Inadequate fund allocation proposal for green belt.
35. Page 45- 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. Consent letter- Number of typographical mistakes. Name of mine is conflicting. Fresh consent letter to be given. It is to be signed by the Managing partner. Letter head is defective.
37. Vertical excavation/ high wall is observed on the eastern part of lease. No proposals are incorporated to reduce the height of existing vertical benches.
38. Pit dimensions mentioned in the text are not matching with the dimensions shown on the relevant plates.
39. Production proposals are on higher side. It should be reduced to 130,000 tonnes per annum.
40. Proposed excavation sections depicts bench height more than design parameters.

ll.
14/2

41. Proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco sensitive zone.
42. The design of the parameter of pit in the text is not in conjunction with that given in different relevant plates. For example the pit slope in text is 70 degree whereas the same is not matching in the relevant plans and sections and thus effect of slope of benches is not considered while designing the pit. By virtue of which the conceptual plan is to be redrawn.
43. Conceptual plan is not dealt adequately.
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. Proposals for development of green belt all along pit should be given initially towards prominent wind direction.
47. 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 and sustainable mining for ensuing five years.
48. Plantation proposals given on page 41 are inadequate.
49. Being the hilly terrain suitable fencing proposals are not given in PMCP at para 8.3.
50. Use of mineral (page 32)- Name of consuming industries should be given
51. All the proposals should be made within the ML only.
52. There are several typographical mistakes which requires to be corrected.
53. Necessary corrections shall be carried out on text and all the plates in view of change in proposal period.
54. All the annexures should be attested by qualified persons for their authenticity.
55. 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

56. 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 should be enclosed in which original lease area, area surrendered and retained area are to be marked precisely. 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.
57. Give the geo referenced coordinates of atleast three GCP on surface plan.
58. Some of the excavation is shown outside the ML area (Plate 6). No proposal outside the ML to be given. Please note that this comment is applicable for other plates.
59. Waste dump is not depicted in standard engineering manner (like dump and its slope/ extent is not evident). Proposals for retaining wall at the foot of dump is not

28
21/12

- tenable as the slope is continuing (Refer plate 6, 7, 8,9, 10). Else give such engineering design with technical scientific study.
60. Conceptual plan- The dumps are deleted. How it is possible. Clarify or do necessary corrections. Pit design parameters are not evident (bench height/ width, slope) in plans and sections. Haulage route is also missing. This will affect the R&R component of this MP.
 61. 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.
 62. What is prominent wind direction of area. Dust to be arrested by green belt plantation. Thus proposals should be in line to this concept for protection of environment.
 63. Surface features shown are not correct.
 64. Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and all the plans should be revised accordingly.
 65. From surface plan it appears that mining during last scheme period is not carried out as per mining plan.
 66. Conceptual pit profile is to be rechecked.
 67. Surface features are not matching with actual ground profile.
 68. UPL should be marked on reclamation plan.
 69. Conceptual plan-Adequate sections are not drawn. It has impact on calculation of R&R and thus it is to be drawn carefully and should be implementable.
 70. More sections on geological plan showing UPL shall be given.
 71. Proposed trial pits are not plotted on the relevant plates nor indicated in the index.
 72. Features to be shown as per rule 32(a) of MCDR 2017 are not depicted in surface plan.
 73. Features to be shown as per rule 32(b) of MCDR 2017 are not depicted in surface geological plan.
 74. Slopes of 70 degree are not evident in any of the conceptual section
 75. Environment plan is not prepared as per rule 32(5)(b) of MCDR 2017.

Note- All the scrutiny comments marked on text and plates shall also be attended.

22-
14/2/19