



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



फाईल संख्या File No: 614(2)/MS-B-178/2008-DDN

दिनांक / Dated : 28 Dec, 2018

सेवा में To : G.N. चौधरी, भूगर्भ विज्ञानी, G.N. Chowdry, Geologist, e-mail - trumboo@hotmail.com  
17-इकबाल कॉलोनी, चनापोरा, 17-Iqbal Colony, Chanapora,  
श्रीनगर (जम्मू और कश्मीर) Srinagar(J&K)

विषय Sub: Submission of Review & Updation of Mining Plan with Progressive Mine Closure Plan in respect of Gunas Nar Bajnar Limestone Mine over an area of 44.00 hectares at Village- Wuyan, Tehsil – Pampore District Pulwama, State-Jammu & Kashmir of Mushtaq Ahmad Trumboo, 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 10.12.2018

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 10.12.2018. 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,

*LS 28/12/18*

(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. मुस्ताक अहमद ट्रूबू केयर ऑफ जवदियान बिल्डिंग 156-सी नीयर पोस्ट ऑफिस राजबाग, श्रीनगर (जम्मू-कश्मीर) 19 0008  
(Mushtaq Ahmad Trumboo, C/o Javadian Building 156-C Near Post Office Rajbagh, Srinagar (J&K) 19 0008)
3. उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, नई दिल्ली।

सहायक खनन भूवैज्ञानिक AMG  
कृते प्रभारी अधिकारी For Officer In Charge



**Scrutiny comments indicating deficiencies in respect of submitted Review and updation of Mining Plan with PMCP of Gunasnar Bajnar Wuyan limestone mine of Mr. M.A.Trumboo (44 hect.) in Pulwama 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 extended upto 2048 as per amended MMDR. However, copy of the State government is not enclosed.
2. Lat- Long coordinates(geo-referenced) boundary pillars are not authenticated by the State government.
3. Address of lessee given on cover page is not matching with the address mentioned in lease deed and as per registration.
4. Name of mine indicated on cover page is not matching with the name mentioned in the lease deed.
5. Annexure 2- English translation be enclosed also.
6. On cover page specify the month for proposal period 2018-19 as most of the first financial year is over.
7. More representative photographs to be enclosed.
8. On page 7 under item 3.4, it is shown that no violation has been pointed out. Whereas violation has been pointed out to lessee on 31.10.2018.
9. On page 15 boreholes proposals are indicated. Proposal should comply rule 12 of MCDR 2017.
10. On page 14 under exploration programme, the headings of guide lines are not adhered.
11. Bore hole analysis has been carried out in the past. Name of the agency has not been indicated.
12. Area covered under different G axis is mentioned but total area of ML is not matching.
13. On page 23 R&R as on 2016 are indicated. The data should be taken from approved MP/Scheme approved on the last occasion.
14. On page 17 section wise mineable reserves are given. The sectional area and face length are not matching with the sections drawn. Thus reserve and resources to be re estimated.
15. On page 19 area under G2 axis is shown as nil. This has not been justified.
16. Life of the mine need to be re calculated.
17. How the resource figure 1093450 comes under 333 category. It is to be re checked.
18. Depletion/updation of reserves and resources has been changed substantially. Reason for such variation should be given scientifically. Refer page 22 & 23.
19. On page 18, 100% recovery is anticipated which is not a true fact. Justification should be given in this regard.
20. Please give production details / exploration / planation etc from opening of mine till 2017-18. Also give production details without mining plan for 2018-19 if any.
21. The deposit seems to be homogenous. Thus intersection distance may be proposed to 50 mtr, also depict UP limits (estimated / projected).
22. The actual work done in the PMCP proposals should be clear cut and to be reflected in reclamation plan, environment plan and surface plan.
23. Total resources appears to be incorrect with reference to 48 ha lease area. First calculate the maximum quantity being a hilly terrain.
24. Proposal for water tanker for sprinkling not given.
25. Orientation of pit wrt conceptual mining plan is not given
26. What precaution to be taken to keep the ground vibration and over pressure under control/ permissible limit.



27. Tentative azimuth and inclination of boreholes has not been indicated.
28. On page 35 average working days are given 300. Re calculate the same.
29. On page 44 it is mentioned that limestone should be soft to satisfy LSF. This is not correct On similar page MgO is indicated as nil. Vital data is missing. On page 45 LSF given is not correct.
30. Page 47- Please specify the type of material which is dispatched to user i.e. when taken out from the ML area.
31. Existing land use pattern given on page 49 is not matching with the data given on page 73.
32. Page no. 50, water regime- Please give data in the tabulated form based on the latest environmental monitoring. Similarly for air quality give data of core zone. Noise data also be given.
33. Page 58- sustainable mining- Be specific in reply as desired in 8.3.1 proposals.
34. Page 65- plantation shall be done along the lease boundary specially initially along the prominent wind direction. Unit is also not indicated on page 65, 66, 67, 68 and 69.
35. Page 73- reassess the area put to use and accordingly financial assurance shall be calculated.
36. Feasibility report page 5- Incomplete data are given.
37. As the mine is a running mine, PMCP proposals should cover green belt development along ML area / conceptual pit limits which are not indicated.
38. Existing land use pattern indicated on page 49 is not correct. In the previously approved mining plan area put to use was shown as 11.59 hectares. Area under road has been indicated as 0.321 hectares only which is not correct also. Entire land use pattern should be re calculated.
39. On page 49 Highest and lowest RL are given which are arbitrary.
40. Conceptual mine planning is not correct. Please rewrite PMCP. Refer page 37-38.
41. No proposals are given for phased restoration. Please be specific what are the proposals for phase restoration once you conceptualize the future restoration.
42. Financial assurance- Area put to use is to re calculated as the area put to use was shown to 11.59 hectares in the previous approved mining plan. Area under road is shown as nil which is not a true fact. Similarly undisturbed area is indicated as 2.541 hectares which is an arbitrary figure. The break up of lease area is 44 hectares itself.
43. 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.
44. Feasibility report need to be corrected in depth of correction pointed here in above in this letter.
45. Financial analysis is not done complete.
46. Some of proposal outside mining lease area is given in plate 6,7,.. etc. which will not at all tenable and cannot be considered for proposal.
47. Proposal of plantation in various plates are incorrect. Green belt development to be given precisely for proposal. Refer plate 13.
48. 1:1 over burden ratio in plate 12 is not appearing justified with respect to text, or otherwise.
49. All the proposals should be made within the ML only.
50. Non mineralized zone if any should be given exclusively in the table (page 19).
51. There are several typographical mistakes which requires to be corrected.
52. On certificate RQP is repeatedly mentioned. QP is not taking note of it.
53. All the annexures should be attested by qualified persons for their authenticity.
54. 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**

55. Surface plan- 3 GCP are not given. In SGP non mineralized zone should only be marked after proving by negative BH.
56. Borehole proposals are given in non mineralized zone which is not justified.
57. Sections are not scientifically drawn to assess / estimate reserve and resources.
58. Section lines / no. of sections near actual excavation zone are insufficient.
59. Reclamation plan is not in line with PMCP proposals. Lessee should take a note to that.
60. Conceptual plan to be redrawn in light of reassessed resources / mineable reserves according to reconfiguration of benches.
61. Financial Area Assurance plan. Area put to use is not correct.
62. Geological sections. UPL not shown as per conceptual planning.
63. One composite section shall also be given for all five years for proposed excavated area.
64. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
65. Sections depicting year wise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.
66. More sections on geological plan showing UPL shall be given.

SL 28/12