



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
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फाईल संख्या File No: : 614(2)/MP-B-243/2014-DDN

देहरादून, दिनांक 27.03.2019

सेवा में/ To : श्री शैलेन्द्रसिंह बिष्ट,
 206 अपेक्षा कॉम्प्लेक्स,
 सेक्टर - 11,
 उदयपुर (राजस्थान) 313002

ssbist@udrmintech.com

विषय/ Sub : Submission of Review & Updation of Mining Plan with Progressive Mine Closure Plan in respect Banour Limestone Mine over an mine of 4.75 Hectares at Village- Banour,, Tehsil - Dooru District - Sirmour, State-HP of Shri Rakesh Chaudhry, 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 13.02.2019

महोदय/ Sir,

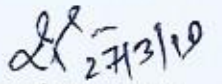
This office is in receipt of two copies of the above-mentioned draft Mining Plan including Progressive Mine Closure Plan on 13.02.2019. On examination of the same the discrepancies / deficiencies observed have been listed in annexure.

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 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.

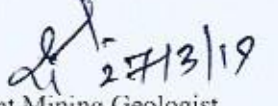
भवदीय Yours faithfully,


 (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 सूचनार्थं प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर।
- 2- श्री राकेश चौधरी, गांव-जोगिवाला, पोस्ट-बद्रीपुर, देहरादून, उत्तराखण्ड।
- 3- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, खान मंत्रालय, शास्त्री भवन, नई दिल्ली।


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 of Mining Plan with PMCP of Banor limestone mine of Sh. Rakesh Chaudhary (4.75hect.) in Sirmour district of HP State submitted under Rule 17(2) of MCR 2016 & 23 of MCDR 2017.

General

1. The plan period should be given from 2019-20 to 2023-24 for five years and proposal should be given accordingly. The same proposal period to be modified in text and plates wherever required.
2. Name of the mine is not matching as per lease deed on cover page.
3. Contents- Give list of annexures and plates here also.
4. The second line of mining plan was rejected on 09.07.2018, note as mentioned 09.07.2016, it should be corrected.
5. All the supporting tables, figures, annexure furnished in the reports should be marked proper numbering and subsequent nomenclature. Table number should be given along with every table.
6. A CD covering the entire document and plans should be enclosed at the time of final submission. An undertaking in this regards by the QP that CD contains same documents & plates as submitted by hard copy of document & text should be given.
7. All the annexure enclosed in connection with Review of Mining plan document are not duly signed by the concerned QPs.
8. It may be clarified whether there is any National Park, Forest Sanctuary etc within a distance of 10 Km from lease area. If so, the copy of order permitting mining operations in the lease area obtained from competent authority should be enclosed.
9. The DILR Map/ Revenue Map authenticated by district authority showing the Lease pillar coordinates to be enclosed.
10. The sufficient number of colored photographs of the area showing existing status of the lease area, benches, boundary pillars, Mines office, etc may be submitted with proper captions.
11. Latest chemical analysis report is not enclosed.
12. At various places, the mine plan period is mentioned different. It shall be for a period of ensuing five years.

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13. Introduction chapter should cover the salient aspects in chronological order pertaining to the brief history of mine and/or the lessee/owner/company supported with the documents referenced as Annexure. It has not covered the details of exploration, period of sustainable development of area based on life of mine for benefit of the society. More or less the introduction should be like the executive summary of the entire RMP, PMCP & feasibility reports. This chapter should also cover the special condition laid down in the grant of concession order by the Himachal Pradesh Government. Compliance to such conditions should be given.

Chapter-1 & 2: General & Location and Accessibility:

14. A boundary pillar of ML area should be connected with three permanent ground control points. In this regard CCOM's Circular dated 21-9-2011 may also be followed.
15. Details about signing authority, photo id documents enclosed in this regard are not discussed.
16. Details of the lease pillars viz. the latitudes and longitudes as well as the co-ordinate of the local grid should be given in tabulated form in the introduction chapter of the RMP. Photograph of all such lease boundary pillars showing their name and precise co-ordinates as authenticated by the state government should also be submitted.
17. The Cadastral Map (Khasra plan) with superimposed lease boundary & revenue details of survey number duly authenticated by State Government authorities had not been submitted for verification of land occupancy.

Chapter: Introduction

18. Mining plan has been prepared under rule 17(1) and should be submitted under rule 17(2) of MCR 2016. It should be modified in whole document wherever is required.
19. Land schedule in respect of total mining lease area granted by the State government stating total private, total government land, gauchar land, etc should also be enclosed as annexure.
20. Quantitative outcome of Air quality, Water Quality & Noise level monitoring should be given in summarized format.

Chapter: 3.0- Review of Mining plan

21. Page-10- Para-2- The mining operation were temporary closed from 13.3.2017. The reason for the same should be incorporated.

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Chapter-Part-A: Geology and Exploration:

22. Page 19- Geological plan should be surface geological plan. On similar page future exploration programme should be strictly as per UNFC. What is present exploration level. Indicate area under G-1, G-2, G-3.
23. Page 20- Proposals should be as per rule 12(4) of MCDR 2017.
24. Page 21- reserves- Plan itself is incorrect thus can not be considered as per UNFC/MEMC Rules. Re estimate the reserves by re drawing sections as per UNFC.
25. Page 23 & 24- Bench wise reserves- Review these again
26. Page 25- Why block wise reserves are given. Is it necessary.
27. The depth of the existing pits to be re-checked as per the updated survey in table given on page No. 18. Bottom RL should be mentioned.
28. Proposals regarding compliance of rule 14 of MCDR is not given.
29. The location of the sample taken of the limestone from the lease area is to be discussed.
30. Page-23-24- Bench height mentioned in Block-A to C as 20m is require to be elaborated.
31. As mentioned, exploration work carried out in the lease area by means of trenching and core drilling. Hence, in order to understand enhancement of mineral reserves supportive tabulated details of phase-wise exploratory drilling carried out, total drilled meterage, total numbers of boreholes drilled, Date of commencement and completion of drilling operation, core recovery, nomenclature of litho-units, core samples test results, etc should also be incorporated in annexure.
32. The bulk density of mineral used in computation of reserves should be supported by suitable test report.
33. Exploration should be proposed as per MEMC Rules 2015.
34. The UNFC reserves could not be carried simply deducting production from the previously estimated mineral reserves by conventional method. Hence mineral reserves need to be re-estimated as fresh with due regards to UNFC guideline. The mineral reserves under UNFC code may only be considered.
35. Exploration should be proposed to cover mineral reserves of entire lease area considering statutory barriers so as to convert mineral reserves of category 122 & 211 into proved category 111 of UNFC.

Chapter-2: Mining

36. Page 27- Life of mine- Year 2018-19 should not be there.
37. Page 28-proposed methods of mining- Irrelevant things are written.
38. Page 29- Mining parameters- Basic parameters highly erroneous and not matching with supporting documents.

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39. Page 29- Road gradient, ramp, slope- Not correct. Specific permission from DGMS be enclosed.
40. Page 30- Proposals for five years be given.
41. Page 31- Brief description- start with core mining proposals. No proposals shall be given for out side the lease area.
42. Page 36- Why dump proposals are given. At places no barrier is evident.
43. Page 37- Position at the plan period- area indicated 0.693 hectares is not correct.
44. Page 38- What are the controlled blasting techniques. Describe in detail. How many shot blast are required per blast. Explain scientifically with proper objectivity. No monitoring of ground vibration, AOP are proposed. Every blast to be monitored. These proposals ar to be given being eco fragile zone.
45. Page 43- Waste is not evident in geological section.
46. Page 44 Protective measures- QP is not using proper terms and parameters. Retaing wall- Not evident in plans and sections. What is Gabion toes.
47. Page 45- waste- Mineral conservation aspect should be taken care to separate saleable/above threshold value of limestone properly. Waste/ low grade should be addressed properly.
48. Basic mine design parameters like bench height, width (at ultimate and during working), face slope angle, ramp gradient etc. are not given.
49. Under existing method of excavation design parameters on some of the important aspects like number of shifts being operated, mines haul road gradient, machinery deployed & its capacity, design parameters, etc. are not addressed.
50. Page no-29- The proposal of mining as discussed under the Para are not correlated with the plan and sections. Moreover, the reference of plates with section is also not mentioned.
51. Page-31 &32- Chapter 2(e)-Para (e) is not described as per guide line. Mining is proposed at the places from bottom to top from 2019-20 to 2022-23 , which is not correct, Needs to be review. The data given under the table on page 31 to 35 need to be modified.
52. Page-no.35&43- It is mentioned that, during ROM excavation there would be 5% generation of inter-burden. In this context analysis report of material to be dumped as waste should be enclosed as annexure.
53. Page-31-& 45-It is proposed to win the mineral from three blocks. Hence, anticipated grade of the mineral has also not been furnished. Grade control considering quality and sorting possibility is not discussed.
54. Page-39- Only the rock breaker should be proposed to broken the boulder instead of secondary blasting.
55. Page no. 42 –The location of the check dam is not proposed.

56. Page no. 35- Para no. 2 (f): Conceptual mining: Vital detail pertaining to life of the mine (5 year block wise), ultimate pit size and post mining scenario and reclamation- rehabilitation aspect have not been discussed properly.
57. Page no. 36 -The conceptual mining plan should be prepared taking into considering of some important aspects like basic & long term design features of mine covering exploration, mine development, optimal exploitation & utilization of the mineral, waste and sub grade mineral management and environmental aspects.
58. Manpower requirement under operation staff should be given in terminology like skilled, Semiskilled and highly skilled.

Chapter3:- Mine Drainage

59. On page no. 41 in Para 3 b): Existing maximum and minimum working level is not mentioned in form of mRL.
60. Arrangements of pumping rain water during rainy season are discussed. Further, annual rainfall and likely quantity of rain water flow through the lease area not addressed. Source of reporting minimum & maximum depth of water table of the ML area not addressed.
61. On page no. 41, in Para 3d): There is a dry seasonal nalla passing through the lease area, is to be developed in such a manner that mine working is not affected during the rainy season.

Chapter-8: Progressive Mine Closure Plan:

62. On page 49- The up dated present land used pattern should be given.
63. Give photograph of PMCP proposals as mentioned at page 60-63 (retaining wall, parapet wall, check dams, plantation and waste dump) and these should be clearly marked on Surface plan as well as reclamation plan.
64. On Page 59; Year wise proposal given under item no-8.3 regarding environment protective measures are appears to be incorrect as management of worked out benches, fencing proposals, check dam formation, environmental monitoring cost, etc. are not specified correctly.
65. Page 60- Table 8.3- No proper proposals are incorporated. This is not proper commentary of reclamation plan and section- plate 4.
66. For air quality specific area of monitoring including core and buffer zone should specified. Further, number of AAQ monitoring stations in core as well as in buffer zone should be furnished in chapter and locations of the same should be shown EMP.

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67. On Page 66 Para 8.6: The financial Assurance table & present land used details & area to be utilized in plan period needs to be checked thoroughly & there should not be any deviations. The detail calculation should be modified based upon above scrutiny.
68. The Xerox copy of financial assurance stated should be enclosed. The period of the financial assurance should be co-terminus to the proposals period. Original BG may be directly submitted by the Bank to the RCOM.
69. The sufficient number of colored photographs of the area showing existing status may be submitted with proper captions.
70. Page 66- Financial assurance- Serious and gross error by QP indicating B category mine. Review as barrier zone are excavated as evident from satellite image, then area will be increased.
71. Page 69- Geological plan should be surface geological plan
72. No proposals shall be given outside the ML area in any plan except on environment plan.

Feasibility Report:

73. The feasibility report of the mine had not been prepared as per guideline and not acceptable.

Plates:

74. Name of mine on plans are incorrect and conflicting with what given else where.
75. Various plates are having conflicting details among each other. They should be matching (plate 3A with surface plan).
76. The index is incomplete & defective, specific colors/symbols as per MMR'61 need to be used for different features so that features indicated over the plan may be interpreted technically and in better way. Red colored strings for UPL as well as for other conventions is making the plan cumbersome and impede the study/reading of the plan.

77. Key Plan:

- (i) The surface topography, direction of flow of water streams/ courses, villages with population, hutments etc. have to be marked in this plate.
- (ii) The other ML/PL leasehold areas falling within 5 Kms should be marked with their identifying details.
- (iii) The direction of the seasonal nallah flowing inside mining lease is not marked in key plan.
- (iv) Interstate boundary should be shown clearly. Adjoining lease also marked on this plan.

78. Surface Plan:

Following discrepancies have been observed in plan.

- (i) Indication in the index should be shown correctly.
- (ii) Ultimate pit limit is not marked.
- (iii) Statutory barriers 7.5m zone should be checked in all plans.
- (iv) Location of the existing dumps not shown in plan.
- (v) MMR Conventions are not used in preparation plan.
- (vi) The lease area may be connected with three fixed reference by use of DGPs/GPs.
- (vii) Surface plan- Updated plan is essential showing surface features.

79. Surface Geological Plan: plate no. 2B

- (i) Ultimate pit limits are not marked in all the three blocks.
- (ii) Sections are not systematically drawn.
- (iii) Further, location of prospecting bore hole may also be marked on plan and discuss in text.
- (iv) Strike and dip of rock types encountered in the area not marked distinctly and values are also not expressed for the same.
- (v) Longitudinal section covering all mineralization of the area should be drawn in the plate no. 2C and index should be corrected.
- (vi) Geological sections drawn are wrong.
- (vii) Dumping proposals are wrong.

80. Year wise Development Plan: 3A to 3E

- (i) As discussed in text, there is no limestone production due to development works. But, details of development works not marked on the plan like garland drains all around pit & dumps, wire fencing around plantation site, etc.
- (ii) Grid line, approach road, check dam & old plantation clearly marked on plate no. 3A to 3E.
- (iii) Existing benches RL not shown properly. It should be marked on all along the bench so as to understand the profile of individual bench.
- (iv) Ultimate pit limit, slope of the faces has not been shown.
- (v) Bottom bench is proposed in first year than top bench, which are proposed in second year.
- (vi) Give a composite section of all the five years together along all section line including waste/reject, dump profile/sequence should be safe and systematic.
- (vii) Give proper engineering plan & section of waste dump. Depict it crest and toe specifically in plans and sections.
- (viii) Development plan- Prima facie not appearing correct.
- (ix) Development plan- Should be prepared from 2019-20 onwards.

81. Reclamation Plan: Plate no. 4

- (i) The modifications suggested in the text should also be incorporated in this plate.
- (ii) Protective measures for stabilization & rehabilitation of dumps, Environmental monitoring, and monitoring stations as proposed in the PMCP not shown on the plan.
- (iii) Very clear cut the year wise completion status of proposed protective works should be incorporated in this plate.
- (iv) Many PMCP proposal are shown within conceptual limit. How it can be considered for progressive mine closure plan to be retained till final closure.
- (v) With bold strip show the conceptual pit limit.
- (vi) Plan not matching with proposal shown in text table 8.3.

82. Environment Plan: Plate no .5

- (i) proposed plantation should be marked on Plan.
- (ii) It has not been prepared as per rule 32(5)(b) of MCDR'2017.
- (iii) The details of area falling within 60m and 500m zone not described or marked in detailed manner or boundary pillar.
- (iv) The area of the village with its name & population should be marked in this plan instead of simply marking village.
- (v) The monitoring stations of Air, Water & noise quality survey is shown on the plan but not discussed in relevant chapter. Location of monitoring stations should be judiciously selected with relation to predominant wind direction, water flow direction & degree of likely site specific impact of various mining operations as per direction of advance etc.

83. CONCEPTUAL PLAN(Plate-7):

- (i) Proposed bench development not marked distinctly on the plan. Haulage routes have not shown without which the plan cannot be considered.
- (ii) Plan should be updated & modified as per above scrutiny.
- (iii) Conceptual plan has not been prepared as per the guidelines. While preparing the plan not considered the statutory barriers like 7.5m green belt, position of the existing nallah, Ultimate pit limits in the all three blocks, bench configuration, haulage routes etc.
- (iv) Proposal and green belt to be evident and lease should be clearly demarcated. (linkage with reclamation plan.
- (v) Not drawn correctly.
- (vi) Level of dump and location is doubtful.

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84. FINANCIAL AREA ASSURANCE PLAN(Plate-8): -

- (i) Plan should be updated & modified as per above scrutiny with a table depicting area put to use.

Annexure:-

85. All supporting documents from first grant of lease to till date, Mining plan & subsequent RMP/Modification/FMCP approval should be given in chronological order.
86. The latest chemical analysis report of ore/mineral rejects/waste etc. should be submitted from an NABL accredited Laboratory.
87. The Sufficient number of copy of coloured field photographs of present mine workings/afforestation/reclaimed area etc, lease boundary pillars with number, RL, latitude and longitude as specified marked on it etc. should be submitted.
88. The copy of original valid BG of extended period should be submitted in the form of annexure.
89. The further submission of document should be properly binding having sufficient strength and the plates are properly folded so that they can be accessed easily.

Note- all the corrections suggested in the text and plates should also be attended.