



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-235/06-DDN

दिनांक/Dated 07.02.2018

सेवा में To: श्री राकेश पुरोहित, खनन अभियन्ता, श्री एस. के. सोनी, भूवैज्ञानिक,  
17E/403,C.H.B. जोधपुर-342 008 J3C-1, सुभाष कालोनी, गली नं. 4  
(राजस्थान) Defence Lab Road,  
rkconsultantsjodhpur@gmail.com जोधपुर-342 011 (राजस्थान)  
Soni.sarnar.shailendra@gmail.com

विषय/ Sub : Submission of Modified mining plan Plan with Progressive Mine Closure Plan in respect Sekinar Khonmuh Limestone Mine over an area of 14.93 Hectares at Village-Khonmuh, Tehsil- Pantha Chowk, District- Srinagar, State-Jammu & Kashmir of M/s Khyber Industries Pvt Ltd submitted under Rule 17 (3) 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 received in this office on dated 16.01.2018

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned Modified Mining Plan including Progressive Mine Closure Plan on 16.01.2018. On examination of the same the discrepancies / deficiencies observed have been listed in annexure.

You are advised to correct the submitted Modified 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.

*Dr. M. M. M.*  
प्र प्रेषित किया  
9/2/2018

02  
12/2/2018



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,

MS

21/11/18

(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। (मेल से प्रेषित)
- 2- मै. खैबर इन्डस्ट्रीज प्रा. लि. नौपोरा, श्रीनगर -190 001(जेएण्डके) M/s Industries Pvt. Ltd, Nowpora , Srinagar-0190 001 (J&K) .
- 3- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, एनसीआर, सीजीओ कॉम्प्लेक्स नई दिल्ली। (मेल से प्रेषित)

MS

21/11/18

सहायक खनन भूवैज्ञानिक Assistant Mining Geologist  
कृते उप खान नियंत्रक एवं प्रभारी अधिकारी For DCOM & Officer In Charge

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**Scrutiny comments indicating deficiencies in respect of submitted modified Mining Plan with PMCP of Sekinar limestone mine of M/s Khyber Industries (14.93 hect.) in Srinagar district of J&K State submitted under Rule 17(3) of MCR 2016 & 23 of MCDR 2017.**

1. 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.
2. On perusal of consent letter, the nominated owner/ Director is Mr. Abdul Quayoom Tramboob whereas on supplementary deed the signature and photo of the Director are different. It needs clarification.
3. Copy of ID of Mr. Abdul Quayoom Tramboob is too faded.
4. List of board directors not given.
5. Board resolution signed by company secretary in favour of nominated owner not enclosed.
6. Feasibility report is not enclosed.
7. More representative photographs are to be enclosed.
8. On examination of surface geological plan and sections, no specific exploration proposals are neither depicted nor future exploration is given. Whereas entire area is given under G-1. Further indefinite depth extent for showing reserves under 111/211 is also evident in geological sections without any scientific basis.
9. The entire area has been brought under G-1 category but the reserves have also been assessed under 222 of UNFC code. It needs clarification.
10. Reserves have been estimated as on 1.11.2017 on page 19 whereas reserves have again been re-estimated as on 01.12.2017. It needs clarification.
11. Calculation and basis of estimation of reserves has not been dealt adequately.
12. On page 16 under future exploration programme, no future exploration is proposed. This does not satisfy the rule 12 of MCDR 2017.



13. Production for the third year to fifth year has been drastically enhanced compare to first year production. Adequate justification has not been given in this regard. Whereas scientific exploration is not evident to justify the R&R.
14. Production enhancement is not commensurate with reserves/ scientific exploration details over SGP especially in depth extent as well.
15. Environmental impact of enhancement in production is not addressed in EIA, like what will be the incremental load on pollution parameters of the area, looking to nearby mining activities by same lessee as well. Fugitive emission assessment in such case to be reviewed and present pollution load with the previous approved quantity be depicted.
16. On page 33 under post mining land use area under pit and quarries is shown as nil. How it is possible when the depletion of production has been taken for reserve estimation. The calculation needs to be made a fresh.
17. On similar page it is stated that there is no generation of mine waste or overburden. How it is possible. The topography and structural configuration of the area indicates that some amount of waste is expected to be generated owing to excavation. Thus it requires clarification.
18. Air, water, vibration monitoring and its stations are not proposed in para 8.3 nor shown in RP/Env plan.
19. Blasting pattern has not been dealt adequately.
20. What precaution to be taken to keep the ground vibration and over pressure under control/ permissible limit is not dealt adequately.
21. Every blast shall be monitored for ground vibration and AOP with DGM approved norms. Proposal for daily monitoring of ground vibration / AOP due to blasting has not been incorporated being the area eco sensitive zone.
22. 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.



23. Being the hilly terrain suitable fencing proposals are to be given in PMCP at para 8.3.
24. All the proposals should be made within the ML only.
25. There are several typographical mistakes which requires to be corrected.
26. All the annexures should be attested by qualified persons for their authenticity. All pages of MP text to be signed by QP.
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.

### **Plates**

28. Coordinates indicated on key plan are not matching with the coordinates indicated in the text.
29. Conceptual plan is blank thus review the UPL limit on SP.
30. Features mentioned as GCP is not shown on plan.
31. Preferably grid should be given in value multiple of 100 (at least).
32. Scientific exploration is not proposed. Proposals should consider all aspects of hilly terrain.
33. In sections reserves is shown with UNFC 111 whereas no exploration details of past shown substantiating G axis-1 in depth extent. Similarly G-1 axis is also depicted upto 1800 mrl.
34. Excavation planning shall be therefore in accordance with extent of proved reserves only. Need to be reviewed.
35. Surface plan is not deciphering the actual ground condition of mine site.
36. Proposal for leaving 7.5 m barrier along eastern and northern lease boundary line should be made clear w.r.t UPL/conceptual plan.
37. In reclamation plan green belt proposals need review w.r.t. the feasibility of plants on slopes.
38. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
39. On conceptual plan, existing plantation is not reflected.
40. Level of exploration on G-axis is not given on SGP.
41. Conceptual plan-. Adequate sections are not given. It has impact on calculation of Reserves & Resources and thus it is to be drawn carefully & should be implementable.



42. Environment plan is not prepared as per guide lines of MCDR 2017. Many features to be shown beyond ML area is not shown.
43. Sections depicting year wise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.
44. More sections on geological plan showing UPL shall be given.

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