



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)/76-DDN

देहरादून, दिनांक .03.2020

सेवा में/ To : Rakesh Purohit
17E/777, CHB,
Jodhpur-342008, Rajasthan

e-mail: rkconsultantsjodhpur@gmail.com

विषय/ Sub : Submission of Review & Updation of Mining Plan with Progressive Mine Closure Plan in respect of Banour Limestone Mine of Shri Deepak Chawla over an area of 4.75 Hectares at Village & Post- Banour, Tehsil – Paonta Sahib, District - Sirmour, State–Himachal Pradesh, submitted under Rule 17 (2) of Minerals (Other than Atomic And Hydro Carbons Energy Minerals) Concession Rule, 2016 & Rule 23 of Mineral Conservation and Development Rules-2017

संदर्भ/Ref. : Letter from Mining lease holder No. Nil dated Nil received on dated 05.02.2020

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, hereinafter refer as RMP, on 05.02.2020. The same has been examined and various discrepancies/deficiencies were observed which has been listed in enclosure to this letter as **scrutiny comments**. One copy of RMP has been forwarded to the State DMG, in case receipt of any comments from them the same shall be communicated to you subsequently.

You are advised to correct the submitted RMP by addressing the discrepancies/deficiencies appropriately and submit **3 fair copies** within **15 days** from the date of issue of this letter in hard bound copies (no spiral binding) along with checklist (changes made scrutiny point wise). Also submit two CDs containing entire RMP i.e. text, plates, annexures, cover letter of final submission, checklist etc.. In case if any other changes made in the RMP other than scrutiny comments, the details and reason/justification for doing so shall be given along with page numbers/plate no/annexure no. etc.

You are advised to prepare the fair copies carefully and ensure that it is correct in all respect and submitted to this office within stipulated time. It is also advised to use both side paper to best possible extent, also optimize the use of drawing paper used in plates.

If the fair copies of Review & Updation of Mining Plan including Progressive Mine Closure Plan not received at this office within stipulated time then final action will be taken appropriately. Further 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,

(मुकेश कुमार शर्मा / Mukesh Kumar)

सहायक खनन अभियन्ता/ Assistant Mining Engineer

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुरा (zo.udaipur@ibm.gov.in)
- 2- Shri Deepak Chawla, 43-Gandhi Road, Dehradun, Uttarakhand-248001 (chawla_sidh@rediffmail.com)

सहायक खनन अभियन्ता / Assistant Mining Engineer

For क्षेत्रीय खान नियंत्रक / Regional Controller of Mines
भारतीय खान ब्यूरो / Indian Bureau of Mines


Scrutiny comments indicating deficiencies in respect of Review of Mining Plan with PMCP of Banour Limestone Mine over an area of 4.75 hectares near Village-Banour, Tehsil-Paonta Sahib, District-Sirmour, Himachal Pradesh State submitted by Mr. Deepak Chawla under Rule 17(2) of MCR 2016 & 23 of MCDR 2017 for the period of 2020-21 to 2024-25.

Text:

- 1) Cover page is not correct. Name of Mineral is not mentioned on cover page. Mention the area in bigha also as per lease deed
- 2) Lease corner points/coordinates are not authenticated by State Government, authenticated lease corner co-ordinates (geo-reference) shall be given.
- 3) On Page no 1, Para 2, Lease Transfer date is not mentioned.
- 4) On Page no 5, State name is wrongly mentioned.
- 5) Power Transmission line which is passing through ML is observed whereas it is not shown/mentioned of its capacity
- 6) Lease Co-ordinates are not matching with the co-ordinates mentioned in previously approved mining plan and neither such authenticated coordinates by State Government is given.
- 7) On Page no 6, Lease coordinates of all the boundary pillars are being tabulated has not matched with provided Annexure-XI in Hardcopy of KML file. KML file is not correct.
- 8) On Page no 7, point 3.3, after deviation observed under G-I axis, justification in remarks is not correct and conflicting as on page 15, area measured under different geological axis is shown for G1, G3. On page 17, resources are shown under G1, G2, G3 level of Exploration, which is contradictory.
- 9) On Page no 7, point 3.3, In actual work done, it is mentioned that no working taken as per proposal, reason for deviation be specified however it is observed on page 8 that quantity of ROM mineral production in tonnes is year wise mentioned, justify.
- 10) On Page No 8, it is mentioned that deviation observed in the preparation of benches height for all the three pits but reasons for deviation have not been furnished.
- 11) On Page 7, 8, 9, 10, Table 3 of review of details of approved Mining plan/ Modified Mining Plan, in all mentioned deviations, nowhere reasons are incorporated.
- 12) On page no 16, under 111 code quantities of High grade and low grade as on 01.04.2015 is as same as reflecting even after depletion on page 17, as on 01/01/2020
- 13) The UNFC reserves could not be carried simply deducting production from the previous estimated reserves by conventional method. Hence minerals reserves need to be re-estimated as fresh with due regards to UNFC guidelines. The mineral reserves under proper UNFC code should be considered as per guideline and detailed exploration carried out, refer Rule 12(6) of MCDR, 2017.
- 14) On Page no 20, it is mentioned that loading of the material shall be carried out manually into ten tonne capacity truck which is unrealistic.
- 15) On page no. 24, 25 Benches height is contradicting wherein adequacy of HEMM is not found just and proper.
- 16) Overall pit slope 45 degrees in conceptual plan which is not justified proper from bench design parameters aspect.
- 17) On Page no 24, Table A2.4 Tentative Excavation program during 2020-2021 to 2024-25, differences between mRLs is not matched with benches height.

- 18) On page no 24, in 2021-22 year, Benches are proposed between 1280mRL to 1245mRL but in page 25, in the table of tentative excavation during year 2021-22 it is given 1380mRL to 1365mRL. This is contradictory/conflicting.
- 19) On page no 24, in 2022-23 year, Benches are proposed between 1420mRL to 1380mRL but in page 26, in the table of tentative excavation during year 2022-23 it is given 1420mRL to 1370mRL and benches height are proposed 5m on page 25 whereas, on page 24 of table with same tentative year, benches height is not reflected as 5m.
- 20) Review all the production proposals along with bench heights as per feasible conditions of the Mine.
- 21) On page no 27, under waste Management, Para 2, it was given that one waste dump is already created within the limit of ML boundary. It is mentioned that dump was situated out of the boundary, which is not feasible. All proposals shall be given within the lease area.
- 22) On page 28, under reclamation & rehabilitation, it is mentioned that anticipated survival rate of saplings is at 60% which is inadequate and it shall be reflected in proposals for maintenance of plantation to see growth rate.
- 23) On page no 37, under Human settlements, village Banour is located at 500m from the ML, for safety reasons control blasting plan has to be incorporated. Suitable and appropriate proposals to control fly rock and ground vibration has to be given.
- 24) On page nos 43 to 47, monitoring cost of air, water, noise and ground vibration limits are not given in each year's PMCP proposal.
- 25) On page no 50 Table A 8.8, as per previous approved modified mining plan with PMCP net area considered for calculation of financial assurance was 4.75 ha but as per submitted review and updation of mining plan with PMCP, net area considered for calculation of financial assurance area is 3.16 ha, which cannot be considered. Review the area put to use
- 26) On page no 50, financial assurance calculation table is not correct. Backfilling details to be furnished.
- 27) 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.

Plates:

- 28) 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.
 - 29) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections. Certificate to this effect and correction be given.
 - 30) Two Plate No.s are mismatching with List of plates in Mining Plan
 - 31) mRLs are mismatching with yearly tentative excavation table of page 24.
 - 32) A boundary pillar of ML area should be connected with three permanent ground control points. In this regard CCOM's circular dated 29-9-2011 may also be followed.
 - 33) On key Plan two Toposheet No.s are given instead of one shown on page no. 5 of Mining plan.(Plate No. 2)
 - 34) Surface plan is not correct, Statutory barriers 7.5 meter boundary not shown in surface plan (plate No.3)
 - 35) As per Plate No.3, Excavation is observed in 7.5m statutory barrier zone.
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- 36) MMR Conventions are not used for preparation of surface plan. (Plate no-4)
- 37) On Plate No.4, G-axis area is not demarcated in Plan and UNFC category is not mentioned in sections AA', BB', FF', GG', HH'
- 38) On plate No.4, waste dump is shown outside the lease area and other dump is shown in 7.5m statutory barrier Zone.
- 39) Ultimate pit limit is not shown properly in surface geological plan (plate No.4)
- 40) Year wise (2020-21 to 2024-25) proposals of excavation in plan is not clearly evident; the color of string should be distinct.(Plate no 5A, Plate no 5B, Plate No 5C, 5D and 5E).
- 41) Proposed working plan for year 2022-23 doesn't match with the text(Plate No.5c)
- 42) Proposed working plan for year 2023-24 doesn't match with the text(Plate No.5d)
- 43) On Plate No. 6 Environment Plan, Scale is mismatched with provided R.F.
- 44) Environment plan is not as per rule 32 of MCDR-2017. (Plate no-6)
- 45) Surface features are not clear in Environment plan (Plate no-6)
- 46) Capacity of Electrical Line passing into ML is nowhere mentioned in any plate.
- 47) Each year's plantation area shown is differed with proposed PMCP.(Plate No-7)
- 48) Conceptual section(Plate 7S) does not match with Conceptual plan (Plate 7)
- 49) mRLs are not shown in 6 sections along lines CC', DD', FF', GG', HH', KK'. (Plate no-7)
- 50) Conceptual plan is not correct; access route from surface ground level up to the pit bottom is not given. And conceptual sections are not given (Plate no-7)
- 51) Financial assurance plan is incorrect, existing broken up area and additional broken up area is not properly marked (Plate No. 9). Review the same in view of scrutiny comments
- 52) Ultimate pit limit is not shown in reclamation plan (Plate No. 9)
- 53) Plantation year not mentioned in reclamation plan (Plate No. 9). Proposed plantation shall be distinct from existed plantation.

General:

- 54) The mine is located in hill slope of the high altitude mountainous terrain susceptible for seismic & other ground movement. Hence adequate proposals should also be incorporated in the document like controlled blasting techniques, erecting retaining walls, check dams and parapet walls to ensure safe, secure and systematic mining for ensuing years.
- 55) Document is deviating with guidelines issued by IBM ensuring proper documents. Systematic mining proposal for mineral conservation and environment protection.
- 56) All the plates should be attested by qualified persons for their authenticity.
- 57) All the annexure should be attested by qualified persons for their authenticity.
- 58) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 59) There are several typographical mistakes which required to be corrected.
- 60) Wastage of paper in plates should be avoided. Optimization is done for same.

Note: All the corrections mentioned in the text and plates shall also be attended.