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खान मंत्रालय / MINISTRY OF MINES

भारतीय खान ब्यूरो / INDIAN BUREAU OF MINES

गुवाहाटी क्षेत्रीय कार्यालय / GUWAHATI REGIONAL OFFICE

क्षेत्रीय खान नियंत्रक का कार्यालय / OFFICE OF THE REGIONAL CONTROLLER OF MINES

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No.IBM/GHY/AS/DH/LST/MS-59

Date: 6/3/2020

To,

Sri. Navneet Agarwal, Managing Director
M/s. NECEM Ltd., Housing Colony Road, Rukmaninagar,
Dispur, Guwahati – 781006. Email: navaneet31@gmail.com

Sub: Scrutiny Comments on the submitted draft report on Review of Mining Plan along with Progressive Mine Closure Plan in respect of New Umrangshu Limestone mine over an area of 35 Ha. in New Umrangshu, Dima Hasao district of Assam State of M/s. NECEM Ltd., submitted under Rule 17(2) of MCR 2016 & 23 of MCDR 2017.

Ref: (1) Your letter dated 13.2.2020 received in this office on 14.2.2020.

(2) Comment of the State Govt. on the submitted draft vide letter No. GM/MM/102-7/Pt.1/7808 dtd. 6.3.2020.

Sir,

Please refer to your letter on the subject cited above, the submitted draft report on Review of Mining Plan along with Progressive Mine Closure Plan in respect of New Umrangshu Limestone mine over an area of 35 Ha. in New Umrangshu, Dima Hasao district of Assam State of M/s. NECEM Ltd., submitted under Rule 17(2) of MCR 2016 & 23 of MCDR 2017, has been examined in this office on the basis of site inspection done on 22.10.2019 by Sri S. K. Mohapatra, Senior Mining Geologist.

The scrutiny comments made on the submitted draft report on Review of Mining Plan along with Progressive Mine Closure Plan, are enclosed herewith as **Annexure-I**. In this regard you are advised to rectify the deficiencies and submit **final three hard bound copies of text & plans** along with the softcopy in **two DVD's** with requisite Bank Guarantee as financial assurance for the plan period as per Rule 27 of MCDR 2017 (if applicable), to this office within **15 (Fifteen)** days from the date of issue of this letter for further necessary action. Invariably the softcopy of the text & plans shall also to be sent to our e-mail id: ro.guwahati@ibm.gov.in. The text shall be in MS word format and plans in Auto CAD and JPG format.

The para-wise clarification indicating the manner in which the deficiencies have been attended should invariably be given while submitting the Review of Mining Plan. No further extension of time in this regard will be entertained and the document will be considered for rejection if not submitted within the above due date and deficiencies not attended properly.

Encl: As above.

Yours faithfully,

PKB
6/3/2020

(P. K. Bhattacharjee)

Regional Controller of Mines

Copy to:

- (1) The Controller of Mines (EZ), Indian Bureau of Mines, Kolkata – for kind information please
- (2) The Director, Directorate of Geology & Mining, Govt. of Assam, Guwahati-19 – for kind information please
- (3) Sri SS Bist, QP Email- ssbist@udrmintech.com – for necessary action

PKB
6/3/2020

(P. K. Bhattacharjee)

Regional Controller of Mines

Scrutiny Comments on Draft report for Review of Mining Plan with Progressive Mine Closure Plan of New Umrangshu limestone mine over an area of 35 Ha. in village New Umransghu, Dist- East Dima Hasao, Assam of M/s. NECEM Ltd., prepared by Sri SS Bist & submitted under Rule 17(2) of MCR 2016 & 23 of MCDR 2017.

Inspected By: S. K. Mohapatra (SMG)

Date of Inspection: - 22.10.2019

TEXT

Chapter: Introduction & Cover page

- 1.0 Year wise production of clinker from the cement plant since its commissioning to its closure be provided in a tabular format.
- 2.0 In the introduction chapter a brief history of the mining lease to be given depicting all the statutory clearances viz. Environment clearance, Consent to Operate etc/ all court cases etc. with documentary evidences right from the grant of mining lease to as on date in a chronological order including this draft submission.
- 3.0 A table indicating year-wise production & dispatch of limestone from the new umrangshu limestone mine may be given in a tabular format for the last 5 years.
- 4.0 It has been stated that the mine has applied for renewal of the consent to operate upto 2013-14. The status of consent to operate beyond 2013-14 upto 2020 to be indicated alongwith supporting proof.
- 5.0 It has been stated that the company has obtained permission from Dima Hasao Autonomous Council vide letter No. NQFRs/Sectt/AMDC/23/2007-11/149 dtd. 2.6.2011 to transport limestone from the lease area. It is also stated that any other permission if required will be taken in due course from relevant authorities. The submitted mining plan was forwarded to the Directorate of Geology & Mining, Govt. of Assam for comments. The reply received from the Directorate is reproduced below *"It can be stated that the company can utilise the extracted limestone for captive purposes only and it cannot be transported. Moreover, the permission for transportation of limestone given by Dima Hasao Autonomous Council does not seem to be under any provision. Thus, any mining of the limestone in the said area and transportation of the same is without authority & illegal"*. Therefore, the submitted proposal is not accepted. No such proposal shall be submitted by the lessee.
- 6.0 Although the cement plant to which the mine is captive to is cited to be closed but, a copy of end use return of the cement plant for the last three (03) years also to be enclosed along with monthly return for the end use cement plant for the current fiscal.

Chapter: General Information

- 7.0 An undertaking from each of the board of Directors to be enclosed regarding their working in other organisations, if any.
- 8.0 The name of Mr. Pradip Bhuyan is not in the Form No. DIR-12, who is cited to be in the list of board of Directors.
- 9.0 A copy of the surface rights acquired to be enclosed as Annexure.
- 10.0 The reason for not participating in the star rating program during the last 2 financial years to be clearly indicated at page no. 9.

Chapter: Details of approved mining plan

- 11.0 The reason for not having a valid document from 2001 to 2010 to be clearly indicated alongwith supporting documentary evidences in a **tabular format**.
- 12.0 The justification given for decrease in limestone production & OB removal may be supported with the clinker production of the cement plant to which the mine is captive too. Year wise

- clinker production for the last 5 years i.r.o the cement plant to which the mine is captive to may be given in a tabular format.
- 13.0 The quantity of OB dumped (till date) in the mine must be given and the area must be clearly demarcated on the surface plan.
 - 14.0 The location of the already cited to be prepared retaining wall & garland drain is not shown on the surface plan/ environment plan. The legend/ index for the retaining wall & garland drain is not shown in the Surface plan & Env. Plan. Neither the above features have been shown on the environment plan.
 - 15.0 The ambient air quality, water quality, noise quality monitored for the all the four quarters for the last scheme period may be enclosed at annexure alongwith summary details of the same in a text of this chapter. A table must also be shown indicating the location of all the monitoring stations within the core & buffer zone.
 - 16.0 In the status of compliance of violations, the date of inspection/ violation date (if based on office records shall only be stated). No other details need to be provided. All the violations & show cause notice issued from this office during the last scheme period has not been reproduced.
 - 17.0 The opinion of QP on compliance of violation letters/ show cause notices is not required. The exact reply made by the lessee to be cited in the specific column enclosing supporting copies of documentation in this regard.
 - 18.0 The details of the suspension order issued from IBM to be detailed at sl.no. 5.18 to be indicated.
 - 19.0 All prohibitory orders issued by the Directorate of Geology & Mining, Govt. of Assam to be enclosed in the annexure with its summary in a chronological manner in text at sl.no. 5.19.
 - 20.0 A copy of the court case filed by IBM against the lessee at the Hon. court of CJM, Guwahati to be cited & enclosed.

Chapter: Geology & Exploration

- 21.0 The drainage pattern of the area adjoining atleast 500m periphery of the ML as shown in the environment plan & surface plan is not matching with the key plan. Neither the protective measures as stated to be carried out till date within the ML area has been shown on the environment plan. The major drainage within the ML area i.e. Langyen river as shown in the environment plan & surface plan are not matching with key plan.
- 22.0 A copy of the geological report of DGM (text & plans both) whose boreholes have been considered must be completely enclosed (text & plates) in the form of a separate annexure.
- 23.0 The threshold value cited at 6.5.1 is incorrect. Needs review.
- 24.0 Supporting technological tests for the tonnage conversion factor may be enclosed or time series data established over the life of the mine may be reproduced.
- 25.0 As per the submitted draft document, the said lease area is a part of exploration carried out area by DGM, Assam under a three year scheme of North Eastern Council, Govt of India. Apart from the above no exploration has been carried out till date within the lease area by way of drilling. Therefore, the geological plan & section of the DGM report may be updated only w.r.t. the present level of excavation, dumping carried out & geological mapping carried out, if any. The updated surface features, if any also needs to be brought about in the plan.
- 26.0 The resources/reserves need to be re-assessed as per the norms of UNFC and strictly complying with the requirements of The Minerals (Evidence of Mineral Contents) Rules 2015. Details of the calculations made in this regard to be provided duly supported with the geological plans & sections.
- 27.0 The details of the resources blocked under different reasons may be spelt out categorically along with details of the calculations made in this regard duly supported with the plans & sections.
- 28.0 The reserves & resources needs to be categorised under the UNFC system properly citing the exact quantity & quality under different UNFC codes.

- 29.0 Future exploration programme needs to be reviewed based on rule 12(4) of MCDR 2017 and the scrutiny cited at point no. 25.
- 30.0 Level/ bench wise reserves/ resources established with grade to be provided.
- 31.0 The pre feasibility report needs to be revisited after addressing scrutiny cited at sl. no. 25 to 30 above. Also the details of EC / Consent to Operate and comments of the State Govt. cited at sl.no. 5 above shall be discussed in this chapter to ascertain the feasibility axis of resources/ reserves as per UNFC.

Chapter: Mining

- 32.0 A reserve of 21.116 million tons has been reported and the proposed production of limestone is envisaged to be 0.083 million tons (max.) within the review of mining plan period. The life of mine has been accordingly projected for another 251.2 years. The lease is cited to be valid upto 2036 i.e. 17 more years. This indicates that the anticipated production proposal is not commensurate to the reserves & the balance lease period. A very meagre production has been envisaged vis a vis the reserves available. Therefore, the proposed production schedule is not accepted & needs to be revised.
- 33.0 The entire development & production proposal needs revision in light of the above comments.
- 34.0 A quantity of mineral rejects has been envisaged in the tentative excavation proposal. But, nothing has been detailed for its management.
- 35.0 Bench height, width, bench slope angle, name of the section along which development has been proposed, direction of advancement, top RL, bottom RL, quantity of ROM, generation of waste, stripping ratio, etc should be furnished in tabular form under each year-wise development proposal.
- 36.0 Location of the ramps/ haulage road should be shown in all the development & production plans.
- 37.0 The drilling & explosive requirements need revision after accounting the modifications as cited at 32-33 above.
- 38.0 The proposed requirement of mining machineries also need revision after accounting the modifications as cited at 32-33 above.
- 39.0 The details furnished under conceptual plan, reclamation and rehabilitation & post mining land use etc need to be revised with respect to the revised 5 year development proposal as cited at 25-26 & 32-33 above.
- 40.0 It has been stated that the lessee has a portable magazine. A copy of its licence to be enclosed and location of the same needs to be furnished.
- 41.0 It may be noted that the approach roads to the development benches have been proposed from outside the ML area which needs review.

Chapter: Mine Drainage

- 42.0 The drainage pattern of the area adjoining atleast 500m periphery of the ML as shown in the environment plan & surface plan is not matching with the key plan. Neither the protective measures as stated to be carried out till date within the ML area has been shown on the environment plan. The major drainage within the ML area i.e. Langyen river as shown in the environment plan & surface plan are not matching with key plan. The mode of disposal of surface run-off water shall be revised indicating the schematic route showing its discharge with proposed provisions of check dams/ settling tanks/ water quality monitoring stations etc. The proposal shall also to be shown in the reclamation plan.

Chapter: Stacking of mineral rejects & disposal of waste

- 43.0 The location of the waste dumps shall be justified that it has been dumped over a non mineralised area. The facts & figures in respect of the same, if any, may be clearly brought up.

- 44.0 Detailed calculation of waste generated during the plan period and upto the conceptual period, area required for its disposal, manner of disposal, no. of terraces, height of each terrace, protective measures required to be furnished should be reflected in respective plan & sections.
- 45.0 A separate plan & section of the both the rejects & OB waste dump may be given in a scale of 1: 500 clearly indicating its yearwise build up over the same in different colours.

Chapter: Use of mineral

- 46.0 It is stated that the limestone raised from the proposed mine will be sent to the cement plant. The location of the cement plant to which the mine is captive to must be indicated in the key plan & environment plan.
- 47.0 It has been stated that the company has obtained permission from Dima Hasao Autonomous Council vide letter No. NQFRs/Sectt/AMDC/23/2007-11/149 dtd. 2.6.2011 to transport limestone from the lease area. It is also stated that any other permission if required will be taken in due course from relevant authorities. The submitted mining plan was forwarded to the Directorate of Geology & Mining, Govt. of Assam for comments. The reply received from the Directorate is reproduced below *"It can be stated that the company can utilise the extracted limestone for captive purposes only and it cannot be transported. Moreover, the permission for transportation of limestone given by Dima Hasao Autonomous Council does not seem to be under any provision. Thus, any mining of the limestone in the said area and transportation of the same is without authority & illegal"*. Therefore, the submitted proposal is not accepted. No such proposal shall be submitted by the lessee.

Chapter: Processing of ROM & Mineral Reject

- 48.0 The location of crushing/ screening plant must be shown on the surface plan/ environment plan, if present within the respective area. A flow sheet indicating the process involved with material balance to be indicated.
- 49.0 The water requirement given for dust suppression appears not to be adequate. Needs revision.

Chapter: Miscellaneous

- 50.0 The name, address, qualification & length of experience of the geologist, mining engineer & mine manager appointed for the mine to be provided with supporting documents.

Chapter: PMCP

- 51.0 The list of flora/ fauna around the lease area may be enclosed as an annexure.
- 52.0 The tree density of the core & buffer zone must be cited in the report.
- 53.0 A table may be added showing the location of proposed AAQ, Noise quality, Water quality monitoring locations. The same to be clearly reflected in the environment plan, key plan & reclamation plan also.
- 54.0 The ambient air quality, water quality, noise quality monitored for the all the four quarters for the last scheme period may be enclosed at annexure alongwith summary details of the same in a text format in this chapter.
- 55.0 The year wise details for the proposed plantation to be carried out must be enclosed in a tabular format indicating the species to be planted, no. of saplings to be planted, location of proposed plantation & area covered.
- 56.0 The yearwise reclamation/ rehabilitation proposal needs revision in light of the comments cited at sl.no. 39 & 44 above.
- 57.0 The protective measures envisaged for discharge of the silt from the mine to the Langyen river must be correctly described on the reclamation plan at a suitable/ proper location incorporating the comments cited at sl.no. 42 above.
- 58.0 All the monitored blasts for ground vibration to be given at Annexure alongwith the maximum charge per delay & scaled distance.

- 59.0 The proposed land usages given in the financial assurance (FA) plan is not correct. Areas for dumping etc as shown are likely to increase the present land use. But, there have been no increase in land usages in the FA. The present & proposed land usages under different heads to be re-estimated and then the FA plan and table to be prepared. The bank guarantee amount will also increase correspondingly.
- 60.0 The FA table shown in the text & in plan differs.
- 61.0 The original bank guarantee to be paid shall be co-terminus with the review of mining plan period and shall be made alongwith the final submission separately.

Consents/ Annexure/ General remarks:

- 62.0 Original copy of Consent letter/Undertaking/Certificates needs to be furnished.
- 63.0 Some of the annexure are obscure. Legible copy of annexure needs to be submitted.
- 64.0 It has been observed that the consent letter is not as per the format. All consent & certificates shall be strictly as per the format.
- 65.0 Clear photographs of all the boundary pillars, garland drain, retaining wall, OB & Reject dumps, Monitoring of Ambient Air & water quality, plantation carried out, Measures adopted for control of dust to be enclosed.
- 66.0 An undertaking of the nominated owner to be enclosed stating 'The mine shall be operated only after taking all permissions/ approvals from the competent authority of Central/ State Govt.'.
- 67.0 An undertaking of the nominated owner to be enclosed stating 'The mine shall maintain the boundary pillars as per rule 12(v) of Mineral (Other than Atomic & Hydrocarbon Energy Minerals) Concession Rules 2016'.
- 68.0 An undertaking of the nominated owner to be enclosed stating 'The violation of MCDR 2017 made by the lessee will not be repeated ever in future'.
- 69.0 Photocopy of the bank guarantee (co-terminus with the review of mining plan period) shall be attached alongwith the final document.

PLATES:

General:

- 1. The key plan, surface plan, environment plan & FA plan shall be signed by a mine surveyor.
- 2. The geological plan & sections shall be signed by the geologist.
- 3. The legends/ index shown in all the drawings must be properly correlated with the corresponding drawings.

1.0 Key plan:

- 1.1 Key plan shall be prepared strictly as per the extant provisions specified under rule 32(5)(a) of MCDR 2017.
- 1.2 The entire toposheet to be shown alongwith the legend.
- 1.3 All AAQ / Water quality Monitoring stations etc to be clearly shown in the core/ buffer zone.
- 1.4 The wind rose diagram has not been shown properly.
- 1.5 The key plan indicates that the Langyen River passes through the bottom of existing mine inside the ML area. But, the same is not reflected in surface plan & environment plan. The course of the river is shown differently in the other two plans.

2.0 Legible copy of the Authenticated lease plan by the State Govt. needs to be enclosed.

- 2.1 As per CCOM circular No 2/2010, a geo-referenced lease map authenticated by the competent authority needs to be submitted.

3.0 Surface plan:

- 3.1 The key plan indicates that the Langyen River passes through the bottom of existing mine inside the ML area. But, the same is not reflected in surface plan. The course of the river is also shown differently.
- 3.2 The quantity of material lying in the OB dump must be clearly updated with date.
- 3.3 The already existing protective measures for the dumps or any other purpose needs to be shown clearly on the plan.
- 3.4 The area where plantation has been done, if any, must be indicated clearly on the plan.
- 3.5 The location of the portable magazine needs to be shown in the plan.
- 3.6 Surface rights area acquired, if any to be clearly shown on the plan.
- 3.7 Map needs to be updated true to all the existing ground field positions. Only existing features to be shown in the surface plan.

4.0 Geological plan/ sections:

- 4.1 The geological plan & x-section needs revision on account of all the above reasons cited at sl.no. 25 above.
- 4.2 After carrying out the revision cited at 4.1 above, all the UNFC codes must be clearly shown over the plan/ section. The borehole assay should be clearly visible at the background and the litho units must be clearly brought about with different colour. No extrapolation of boreholes to assess the resources to be carried out both laterally as well as depth wise.
- 4.3 The UPL needs to be shown in the geological plan.

5.0 Mine development/ production plan & sections/ dump plans & sections/ conceptual plan/ sections:

- 5.1 The yearwise development plan/ section must be revised after incorporating the corrections cited at sl.no. 32-33 above. The borehole assay should be clearly visible at the background and the litho units must be clearly brought about with different colour in the sections.
- 5.2 The immediate last & proposed bench position must be clearly reflected in all the development sections. However the immediate last position must be shown on a lighter shade.
- 5.3 The immediate last & proposed bench position must be clearly reflected in all the development plans too. However the immediate last position must be shown on a lighter shade.
- 5.4 The location of ramps etc must be clearly shown alongwith the UPL in all the yearwise development plans & sections.
- 5.5 The Conceptual plan and sections also needs to be updated i.r.o the comments as cited at 39 above.

6.0 Environment plan:

- 6.1 Environment plan shall be prepared strictly as per the extant provisions specified under rule 32(5) (b) of MCDR 2017.
- 6.2 All existing surface features and contours beyond the ML area upto 500 mtr radius boundary need to be correctly shown in the environment plan.
- 6.3 An adjoining area to the present ML has been shown as the ML of NECEM. The same may be reviewed.
- 6.4 The contour levels are not at all visible.
- 6.5 The key plan indicates that the Langyen River passes through the bottom of existing mine inside the ML area. But, the same is not reflected in environment plan. The course of the river is also shown differently.
- 6.6 The already existing protective measures for the dumps or any other purpose needs to be shown clearly on the plan.

