



भारत सरकार / GOVERNMENT OF INDIA

E-mail

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/MEG/EKH/LST-2

Date: 19.01.2018

To,

Shri. RK Sharma, Managing Director

Komorrah Limestone Mining Co. Ltd.

207, Upper Lachumiere, Shillong-793001, Meghalaya

e-mail : klmclimestone@gmail.com

Sub: Scrutiny Comments on the submitted draft for Review of Mining Plan along with Progressive Mine Closure Plan in respect of Komorrah Limestone Mines over an area of 240.55 hectares in East Khasi Hills District of Meghalaya State, submitted under Rule 17 (2) of MCR 2016.

Ref: Your letter No. KLMC/RML/56(A)/450, dt. 31.03.2018.

Sir,

Please refer to your letter on the subject cited above, the submitted draft for Review of Mining Plan along with Progressive Mine Closure Plan in respect of Komorrah Limestone Mines over an area of 240.55 hectares in East Khasi Hills District of Meghalaya State, submitted under Rule 17 (2) of MCR 2016, has been examined in this office on the basis of the site inspection done on 27th-28th December 2017 by Sri S. K. Mohapatra, Senior Mining Geologist.

The scrutiny comments made on the submitted draft for 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, 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,

[Signature]

(P.K. Bhattacharjee)

Regional Controller of Mines

Copy to: (1) The Controller of Mines (EZ), Camp at IBM Nagpur – for kind information.

(2) QP concerned (Shri. NM Chanda), E-mail: nbc1949@gmail.com

[Signature]

(P. K. Bhattacharjee)

Regional Controller of Mines

TEXT

- 1.0 In the preamble chapter, it has been mentioned that KLMCL, a joint venture of Meghalaya Industrial Corporation and Misha PTE Limited with equal participative interest; was incorporated in 1973. The statement differs from the details mentioned in approved review of mining plan document approved by this office on 10/07/2016. The same needs to be clarified with appropriate documentary evidences. In this chapter a brief history of the mining lease to be given depicting all the statutory clearances including EC/FC etc and court cases (if any) with documentary evidence right from the initial grant of this lease in chronological order and in a tabular format.
- 2.0 Copy of letter from the State Government regarding the validity of the mining lease to be enclosed.
- 3.0 All the consent/ certificates/ Undertakings shall be submitted in original.
- 4.0 An undertaking to be submitted in original from the nominated owner on commencement of mining operations only after getting the permission from all the concerned statutory bodies as well as for carrying out the proposed exploration program in a time bound manner. The same shall be enclosed immediately after the consent letter.
- 5.0 All the photographs attached shall be completely clear with a caption note given at its bottom.
- 6.0 The review of earlier approved proposal (pg. 11) shall be given only w.r.t. afforestation, reclamation & environment control measures.
- 7.0 A copy of all violations & compliance status shall be given in a chronological order.
- 8.0 The statement given under sl. no. 3.5 is wrong. The same may be reviewed.
- 9.0 Under the review of monitoring of AAQ parameters (pg 97), the reported figures of air quality is of May 2013; whereas the submitted annexure for the same is of Mar. 2018. Please clarify.
- 10.0 The proposed exploration program is not acceptable. The future exploration program needs to be strictly adhered as per Rule 12 (4), (5) & (6) of MCDR 2017 & shall be carried out in such a manner which delineates the entire limestone extent (lateral/ depth wise) for the entire ML area. The geo co-ordinates of the proposed boreholes to be shown in text.
- 11.0 Test report of limestone sample from NABL accredited lab./ Government lab to be enclosed. The area is fissured & there is probability of ore loss on account of dilution at contact zones. The basis of consideration of the said recovery factors & tonnage conversion factors need to be furnished.
- 12.0 The un-recoverable resources on account of inferior quality/ safety zone/ HFL etc to be reported separately under pre-feasibility mineral resources. The table of resources/ reserves to be updated accordingly as per the prescribed format provided in the manual. The feasibility study report shall take into consideration the above statement. A table may be inserted indicating the resources established in different categories in different areas (*to be reported in ha.*) within the ML and shall be shown in the geological plan. Also, there have been changes in resources/reserves from the last submitted document. Justification for the changes shall be reported.
- 13.0 Geological Section C-C': Justification of extending the resource up-to 20 MRL for band-II to be given.
- 14.0 The conceptual plan depicts the mine life up-to 2023; whereas the reserves are reported upto 20 mRL (much below, what has been shown in the conceptual plan).

- Therefore, the conceptual plan for both the life of deposit and lease period shall be submitted.
- 15.0 The earlier submitted document reflected a HFL of 64.385 mRL where as the present submitted document reflects it at 16.835 mRL. Justification for the same may be given. Similarly, despite of the above changes the minimum water table of the area (refer pg 81) remains the same as submitted earlier. The same may be explained. The minimum & maximum reduced level of the workings as stated at pg. 81 is also not matching with the surface plan.
 - 16.0 The reduced level specified at existing land usage (pg 92) differs from the surface plan. The same may be explained.
 - 17.0 The geo co-ordinate extent of the mine (quarry wise) & dump should be given in a tabular format.
 - 18.0 Year wise in-situ excavation reports a constant figure of OB/ waste for all the 5 years. The same may be explained.
 - 19.0 A table indicating the boundary geo co-ordinate extents of the year wise proposed pit & dump, its floor & crest reduced level etc should be given in a tabular format.
 - 20.0 The mode of disposal of surface run-off water shall be discussed 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. The details of construction of check dams/ settling tanks etc shall be given along with their design in the chapter on mine drainage.
 - 21.0 A risk assessment report along-with disaster management plan of the mining unit shall be enclosed duly approved by the management of the mine/ competent authority.
 - 22.0 Notice of appointment of the mining engineer & geologist in the prescribed format under MCDR 2017 may be submitted to the competent authority & a copy of the same to be annexed in this document with reference in the text.
 - 23.0 Precautions taken for limiting the ground vibrations may be explained as stated at pg. 97 of the document.
 - 24.0 In the summary of year wise proposals for reclamation/ afforestation/ management of the mine/ existing refuse dumps, achieved figures have been stated for the proposal period. The statement of actual achievement with clear cut future definite proposals to be given.
 - 25.0 The area considered as fully reclaimed / rehabilitated is not correct and the total land usage at the end of 5 years to be re-calculated & so-on the financial assurance required. There have been changes in the existing land usage as submitted in the last document. The reason for the changes may be explained in detail. Usage wise clear cut colour coded hatched boundaries for the area already put to use & future proposal to be shown in the financial assurance plan.
 - 26.0 In the pre-feasibility report submitted there have been difference in the reported figure of production cost (pg 26 & 27) of the pre FR as it will affect the profitability statement given at pg. 27 of the pre FR. The modifying factors stated at pg 28 of the submitted pre FR will affect the reserve proportion. The same may be reviewed to update the resource/ reserve figures.
 - 27.0 The line spacing of the text should be single to reduce un-necessary increase in the number of pages of the document.

ANNEXURE:

Following documents need to be enclosed in annexure:-

- 1.0 Copy of the extended lease deed/ letter from the State Government regarding validity of the mining lease.
- 2.0 Undertaking from each of the board of directors of the company shall be enclosed regarding their working in other organisations.
- 3.0 Copy of Form-J & Form-K in respect of the existing boreholes sunked in the mine. All of the same shall be duly countersigned by the geologist of the mine.
- 4.0 Copy of the surface water drawl permission taken from the competent authority.
- 5.0 Copy of the environment clearance letter.
- 6.0 Copy of the valid consent to operate from the state pollution control board.
- 7.0 NABL test reports on quality of limestone, recovery factor & tonnage conversion factor.
- 8.0 Copy of all the violations issued from IBM/ DGMS/ MoEF&CC/ SPCB with compliance status in chronological order to be enclosed.
- 9.0 Colour photographs of all lease boundary pillars showing the co-ordinates.
- 10.0 All pages of the annexure shall be signed by the qualified person and a list of annexure to be enclosed.
- 11.0 Annexure submitted with the mining plan are obscure. Legible copy of annexures to be submitted.

PLATES:

1.0 General:

- 1.1 The name of the nominated owner shall be invariable given in all the plates of the document.
- 1.2 The period of review of the mining plan shall also be given in all the plates of the document.

2.0 Key plan:

- 2.1 The complete Toposheet shall be shown in the backdrop along with its original legend.

3.0 Authenticated lease plan to be enclosed.

4.0 Surface plan:

- 4.1 Index not shown for few representations shown in the plan.
- 4.2 HFL to be marked on the surface plan.
- 4.3 The existing surface features beyond the mentioned working pits but within the MI area are not matching. The same needs to be updated.

5.0 Geological plan/ sections:

- 5.1 Index not shown for few representations shown in the plan.
- 5.2 UPL needs to be shown in the geological Plan and sections.
- 5.3 **UNFC codes** shall be clearly shown in plan/ sections after attending the deficiencies as stated in the text.
- 5.4 Proper syntax/ code shall be used to indicate the ore continuity beneath the bottom of the drilled boreholes.
- 5.5 The ML boundary extents to be shown in all the geological sections.
- 5.6 Section A-A' & F-F': Projected borehole considered for reporting the resources have not been shown.

