

भारत सरकार/Government of India खान मंत्रालय/Ministry of Mines भारतीय खान ब्यूरो/Indian Bureau of Mines हैदराबाद क्षेत्रीय कार्यालय/Hyderabad Regional Office



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Room No.603, 6th Floor, CGO Towers, Kavadiguda, Secunderabad – 500 080 Date: 14.11.2019.

To Sri P.R.Venkatrama Raja, Nominated Owner, M/s Ramco Cements Ltd (Formerly Madras Cements Ltd), Auras Corporate Center, 98-A Dr Radhakrishnan Salai, Mylapore,Chennai-600 004.T.S.

Sub: Submission of Modified Mining Plan in respect of Kolimigundla Limestone mine of M/s The Ramco Cements Ltd (Formerly Madras Cements Ltd) over an extent of 255.0 ha in Kolimigundla, Kalvatala and Itikyala villages of Kolimigundla Mandal, Kurnool District of AP State submitted under Rule 17(3) of MCR, 2016.

Ref: 1. Your letter no. RCL/Mines/KG/IBM dated. 23.09.2019.

Sir.

With reference to your letter cited above on the subject, the site inspection was carried out on 23.10.2019 by Shri Ibrahim Sharief, Sr. ACOM accompanied by Shri V. Prasad, Qualified Person and Ajmal Ahmed, Agent The draft Review of Mining Plan has since been examined, the same scrutiny comments have already been forwarded to you and your Qualified Person on respective e.mail ids i.e ms@ramcocements.co.in, prasadv@ramcocements.co.in and nareshkumard@ramcocements.co.in as submitted in the document.

- 02. You are advised to attend these deficiencies as per the annexure and resubmit the document, complete in all respects, in three bound copies along with soft copy in the form of CD (2Nos.). In this regard you are directed to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities @ Rs.Three lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs.Ten lakhs as per the provision of Rule 27(1) of MCDR, 2017 at the time of submission of final copies of the document within 15 (fifteen) days from the date of issue of this letter, failing which the document will be disposed without giving any further opportunity.
- 03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

Yours faithfully,

(Shailendra Kumar) Regional Controller of Mines

Copy to Shri V.Prasad, Qualified person, Shri D.Naresh Kumar, Qualified Person, The Ramco Cements Ltd., No.2-77,1st.Floor, Jwala Complex, Main Road, Kolimigundla Village & Mandal, Kurnool Dist., A.P. for information & necessary action

(Shailendra Kumar) Regional Controller of Mines

मूल पति पर नहीं खान नियंत्रक (द), भारतीय खान ब्यूरो, बेंगलुरू।

(शेलेन्द्र कुमार) क्षेत्रीय खान नियंत्रक Scrutiny comments on Modification in Mining Plan submitted by M/s The Ramco Cements Private Limited for it's Kolimigundla Mining lease over an extent of 255.31 hectare in Kolimigundla village, & Mandal, Kurnool District submitted under rule 17(3) of MCR 2016.

- 1. 39.251 Million tones of reserves were estimated in the present submission and balance lease period left under section 8A of MMDR Act is 30 years i.e. 2050. Commissioning of 0.6 MTPA mine is not in consonance with the mineral conservation point of view, because at the end of lease period mine will be left with substantial quantity of Limestone. Thus commissioning of mine for 0.6 MTPA shall be justified in light of the above.
- 2. Future proposal of Nayanapalli Limestone mine should not be dealt in this document.
- 3. There is no link to this lease to the proposed enhancement of clinker production of cement plant, hence information related to increase in production capacity of cement plant is not necessitated in this document.
- 4. The rated capacity of feeding mines to the plant as submitted in the document is incongruence with earlier approved document, hence not acceptable.
- 5. NCBM report for conversion factor of Limestone to Clinker be got prepared and submitted.
- 6. Survey of India topo sheet no. furnished in the text and that of plan are different, should be corrected.
- 7. General location map: there exist road connecting state highway Tadipatri and Banaganapalli passing through the lease area, the same is to be recorded in page no.10.
- 8. Details of last modification in mining plan should be furnished in para 3.2 indicating date of approval and reason for modification.
- 9. The certificate of incorporation of the company should be enclosed.

Review:

- 10. The modification in approved mining plan was approved by IBM on 07.06.2018 with development proposal of roads, removal of top soil, production etc. during the years 2018-19 and 2019-20. But during inspection of mines no mining activities was observed, which needs to be justified.
- 11. Earlier approved proposal should be specified as for the years 2018-19 & 2019-20, instead of stating 1st year and 2nd year.
- 12. Details of bore holes proposed as per earlier approved document (along with location, depth details) and actual achieved should be furnished. Further agaist 83 bore holes only 63 bore holes were drilled, in this regard justification for not carrying out balance 20 bore holes should be submitted.
- 13. Justification for deviation in development, production etc. as per earlier approved proposals should be furnished.

Geology and Exploration

- 14. Details of Mineralised and non mineralised area should be submitted in the text and demarcated in plans.
- 15. Reserves should be properly estimated considering safety zone of surface features like, nala, Road, Electric lines, Habitations etc.
- 16. Phase wise exploration carried out in the lease area should have been furnished in tabular form incorporating no. of bore holes, year of drilling, total meterage, type of drilling (DTH/ Core), maximum and Minimum depth etc. Details of all bore holes drilled so for should be submitted in tabular form incorporating Bore hole no., location (Lat/ Long), collar RL, Depth at which ore encountered/ exhausted from surface etc.. All the Meter wise analysis of bore holes logs should be submitted duly

- signed by the concerned Geologist under whose supervision the exploration was carried out.
- 17. Future exploration programme of 17 no. of bore holes should be proposed in the year 2019-20 only instead of proposing in the year 2023-24. Compliance of rule 12(4) of MCDR 2017 should also be commented upon.
- 18. Cost of exploration to be furnished with documentary evidence.
- 19. Chemical analysis of different lithologs in the lease area should be submitted. Further while assessment of reserves/ resources these different lithologs should be computed separately and submitted for clarity considering threshold value as per IBM notification only.
- 20. In page no. 37, UPL is considered up to 40 meters depth, whereas in justification of feasibility axis the same is considered up to 27 meters and in para 'Mine drainage' max working depth is considered as 20 meters.
- 21. Reserves estimated seems to be on lower side as ore is found to exist in the bore holes 21A, 51, 5254A, 55,56, 57 etc. but such area containing bore holes encountering ore is not considered for estimation, which needs to be clarified.
- 22. Reserves should be estimated and updated properly considering additional reserves established based on recent exploration, lease period etc. for clarity. Further bench wise (Massive Limestone, Flaggy Limestone, Gray Limestone etc.), block wise resources/reserves with weighted average grade of ore should be furnished in tabular form. Justification of UNFC codes for reserves/ resources assessed should be furnished.
- 23. It is stated that additional 1.377 MT of Siliceous Limestone and 6.292 MT of Flaggy Limestone is assessed separately, but as per bore hole logs no litho unit named siliceous Limestone is mentioned and Flaggy Limestone contains Cao of 36- 45% and SiO2 of 13 to 17%. Thus assessing reserves separately needs to be clarified.
- 24. In feasibility axis, particulars of cost of production should be as per format of Annual returns only.
- 25. Feasibility report should be prepared as per the format prescribed "part-V" of MEMC rules 2015.

Mining

- 26. No mining activity has been started so far in the lease area, the same should be recorded, accordingly Page no. 39 & 40 should be modified.
- 27. Year wise tentative excavation proposal should be furnished as per the prescribed format only.
- 28. Mining operations should be proposed considering safety zone as per statute from habitations, 50 mtrs from village road passing through the lease area, surface features etc. Proposal of adoption of control blasting technique to be submitted. Details of storage of explosive should be furnished.
- 29. Two pits were proposed in two different locations instead of one pit as per the earlier approved document, needs to be justified.

Conceptual plan:

- 30. There is no waste generation is assessed in estimation of resources/ reserves, but waste dump is shown in conceptual period, needs justification.
- 31. Green belt development should be in the safety zone on either side of village road, nala, dwellings as per statute, proposal should be furnished accordingly.

Mine drainage:

32. Proposal of study on Ground water table in the lease area should be submitted in the document.

Progressive Mine Closure plan

- 33. Review of measures proposed in approved PMCP should be furnished.
- 34. Details as per the prescribed format of IBM manual 2014, should be furnished.
- 35. Submit the baseline data regarding the number of settlements and area covered within the lease area, flora observed in the lease area etc..

- 36. Details of base line data prepared by the agency accredited by MOEF should be furnished. Details of monitoring station for air, water, Noise with location should be furnished.
- 37. The bank guarantee should be submitted as per the land put to use with validity up to proposed plan period.

Plans and sections

- 38. It is stated that, "Lease sketch issued along with lease deed was different from the lease sketch authenticated by the State Govt. both the sketches has been enclosed as Plate-II &Plate-IIA.the same is confirmed from letter of State ADMG enclosed as Annexure-13.
 - It is noted that earlier lease was granted in single block as per original grant order and by excluding the survey nos., now the lease sketch indicates that lease area is spread in **four blocks**. In this regard DGPS survey duly authenticated by State Government should be submitted to indicate the actual lease area excluding the khasara no. not granted in the lease area as per GOMs no. 139 dated 29.11.1999.
- 39. Surface features depicted in surface plan is incongruence with earlier approved document, surface features like Nala which was passing through the lease area is now showing outside the lease area and 6.239 ha is stated to be under habitation in the lease area (page 72), the same should be depicted in surface plan.
- 40. Surface plan submitted is not matching with actual field condition, Some dwellings are observed on western side of the lease area, but the same are not depicted. Surface plan should be prepared and duly dated and signed by qualified surveyor (as per MMR 1961) also furnish name of the surveyor& his certificate no. Further True North should be indicated instead of Magnetic north. Grid lines furnished in the earlier approved document should be furnished
- 41. Key plan should be submitted on Survey of India topo-sheet and the details as per the provision of rule 32(5) of MCDR,2017 should be incorporated.
- 42. Surface right held by the lessee should be indicated in surface plan, as proposal for Access road, stocks.
- 43. Geological Plan: Standard colour codes should be used in plans and sections as per MMR 1961; bore holes drilled should have been indicated in red colour.
- 44. Geological section (refer Plate IVA) submitted in 1: 4000 scale could not be verifiable, hence the same should be submitted on 1:1000 scale to indicate distinctly RLs, Lithology, bore hole details, UPL etc. Further, in addition to stating cement grade Limestone, low grade, high grade limestone, Geological terms should have been mentioned.
- 45. Specific year should be furnished in Production and Development plan instead of mentioning I Year, II Year. Further Development sections should be furnished in 1:2000 for clarity.
- 46. Conceptual plan: position of pit at the end of lease period should be distinctly depicted for clarity.
- 47. In the environment plan the features within 500m of the lease may also plotted as per rule.
- 48. If due to aforesaid changes, the data in other chapter or plates changes, they may please be corrected accordingly and also ensure the consistency of the data submitted in various chapters of the document
