

Inspection report cum scrutiny comments on the Review of Mining Plan submitted by M/s NCL Industries Limited in respect of Gundlapalli Limestone Mine (130.37 hectare) in village Gundlapalli, Mattampalli -Mandal, Suryapeta-District of Telangana State.

Observation:

1. Due to the **Pulichintla project** on Krishna River, HFL (High Flood Level) in the region is 53.34 meters above MSL which bay in to lease area below HFL on North-western and Southern side, covering an area of about 42.318 Ha. In this regard commitment was made to obtain permission from Directorate of Mines Safety (DMS) and to construct “protective bund all along the HFL (Highest Flood Level) contour and water front” to carry out mining operations. Also seasonal nalas passing through the lease is to be protected by Bund on either side. In this regard the *“Rule 127 OF MMR 1961 stipulates that “Danger from surface water – (1) Where any mine or part thereof is so situated that there is any danger of inrush of surface water into the mine or part, adequate protection against such inrush shall be provided and maintained.* However during inspection of mines, mining operations are found to be continued and extended in to HFL without implementing protective measures as stipulated in approved modified Mining Plan. You did not produce any permission letter from DGMS for mining in the said area.

In view of the above you are hereby advised to obtain permission from DGMS and carry out protective measures to avoid danger from surface water before continuing Mining operations in the said area.

General

2. On cover page, proposed plan period of the document submitted be furnished. PMCP is part of Review of Mining Plan as per statute, so no need to mention PMCP separately. Name of the Qualified person prepared the document should be mentioned distinctly.
3. Color photographs indicating mining activities, dust suppression on mine faces & haul road, plantation, exploration, lease boundary pillars, ground control points be submitted.
4. Details of the Nominated owner with address and contact details be furnished in para Lease details.

Review of Mining Plan

5. Review of the earlier plan period for the years from 2017-18 to 2019-20 to be furnished. Further there is deviation in exploration in the last plan period i.e. against 32 no. of bore holes only 12 bore holes were completed. The reason for the above deviation be furnished.
6. Certified copies from State Government for production reported during the years 2017-18 to 2018-19 and 2019-20 to be submitted.
7. It was committed to carry out detailed Hydrological survey to assess the ground water table during the year 2017-18, but the same is not carried out so far.

Geology and Reserves

8. Details of all samples analysis done meter-wise along with analysis done by NABL accredited lab be furnished in page no.15, para 1.0.e.iii).
9. The details of bore holes drilled should be submitted in tabular form incorporating Bore hole no., location (Lat & Long/ UTM), collar RL, Depth, core recovery% etc. Further 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.
10. Exploration covered under G1, G2, G3, scale be furnished in tabular form.
11. Cost incurred in respect of exploration carried out be furnished with documentary evidence.
12. In computation of Reserves/ resources following details are furnished separately for easy reference:
 - i. Resources blocked due to catchment area (below HFL Low lying area 42.318 Ha),
 - ii. Resources blocked due to safety & precautionary measures as per statute like protective bund along HFL contour & water front, Safety zone of Lift Irrigation project and Seasonal nala's. etc.
 - iii. UPL due to Ground water table encountered in the lease.
13. Reserves had been enhanced from 17.8 Million tonnes (as on 01.04.2016) to 65.66 Million Tonnes (as on 01.01.2020 without considering following facts:
 - i. Pit-1 area as it falls under below HFL
 - ii. Safety zone of Lift Irrigation project and Seasonal nala's.
 - iii. Additional bore holes drilled with meter wise analysis and 10% of the total samples analysed from NABL accredited lab.
 - iv. Weighted average grade of ore

Else the old Reserves and Resources needs to be considered for assessment.

14. Litho logs furnished in Form- J is found different than that of core logs i.e. Silliceous Limestone, Clay material is considered as Grey Limestone, these aspects needs to be rectified with supporting documents.
15. Bench wise & section wise computation of Reserves/ Resources be furnished.
16. Justification for UNFC code should be furnished with specific details related to the lease area.
17. Feasibility report furnished is sketchy and should be prepared as per guidelines.

Mining proposal:

18. No Mining operations be proposed in this plan period as well as at conceptual period in low lying catchment area of Krishna River below HFL i.e. 53.34 meters above MSL. Accordingly year wise production and development proposals should

- be suitably modified. Further detailed to be furnished regarding precautionary measures taken to tackle the monsoon water, HFL to avoid inundation of pit.
19. In Year wise development plan, Production and development proposals are proposed in the seasonal nala joining Krishna River, which cannot be acceptable, which needs to be modified. Protective bund should be constructed on either side to protect the seasonal nalas in the lease area.
 20. Present position of pits incorporating no. of benches in top soil, ore, dimension of pit, pit top, pit bottom etc.
 21. Details be furnished in respect of blending ratio of three leases feeding to captive plant to utilise the siliceous Limestone by blending with high grade ore incorporating Plant targeted quality with quality available from all the three mines.
 22. Layout of mine be detailed in page no.35 and same be depicted in year wise development plans.

Conceptual plan

23. Conceptual plan be modified considering the facts below.

Full Reservoir Level (HFL) of Pulichintla Project marked in Lease Sketch authenticated by State Government, Pit-1 area as it falls below HFL, Safety zone of Lift Irrigation project and Seasonal nala.

PMCP

24. Review of earlier approved PMCP be carried out and submitted.
25. Base line data, EIA/ EMP be furnished as per earlier approved document prepared by consultant accredited by MOEF.
26. Area be computed for Financial assurance based on the comments above and modified.

Plans and sections

27. Copy of original lease sketch authenticated by State Government during first renewal of lease be submitted.
28. Grid lines should have been furnished in UTM co-ordinates as well for easy reference.
29. Different Colour codes as per statute should be used in all plans and sections, for clarity.
30. Surface Plan should be updated incorporating
 - i. Contours
 - ii. HFL line clearly indicating catchment area of Krishna River under Full Reservoir Level (HFL) of Pulichintla Project marked in Lease Sketch (low lying area of 42.318 Ha) and outside lease area to assess its continuity.
 - iii. Lift Irrigation project.

- iv. Seasonal Nala passing through the lease area
 - v. lease boundary Pillars distinctly marked with larger Font
 - vi. Name of the surveyor with Signature & date mentioning certificate no..
31. Surface Geological Plan and section, the following details should be depicted distinctly
- i. Contours
 - ii. Area explored under G1, G2, G3 scale etc.
 - iii. Area under different UNFC codes in different colours.
 - iv. Ultimate Pit Limit
 - v. HFL Line Low lying area of 42.318 Ha falling within Full Reservoir Level /HFL of Pulichintla Project,
 - vi. Seasonal nala's
 - vii. Table indicating proposed exploration.
 - viii. Details as per comment at sl. No.13
32. Surface Geological Plan and section,
- i. Ultimate Pit Limit
 - ii. HFL Line Low lying area of 42.318 Ha falling within Full Reservoir Level /HFL of Pulichintla Project
 - iii. Seasonal nala's
 - iv. Mine Pits
33. Conceptual plan
Outline of the proposed plan period as well as position of pit at conceptual period be depicted for easy reference
34. Reclamation plan : the following are to be incorporated in this plan:
Protective measures like bund along nala's, Protective bund along HFL contour, water channels, Garland Drains, etc.,
35. Financial assurance Plan
Area proposed for plan period be depicted distinctly, in the plan additional area proposed is marked with contour lines instead of to be mined out area, needs to be corrected.
36. In view of the comments above relevant para, plans and section should be suitably modified and submitted.
