

Inspection report cum scrutiny comments on the Review of Mining Plan submitted by the by M/s Bhavya Cements Limited in respect of Bhavya Limestone Mine-II (346.32 hectare) in village Tangeda, Mandal- Dachepalli, District- Guntur in Andhra Pradesh State.

1. The document should be submitted as per the prescribed format of “IBM manual for appraisal of Mining Plan 2014” only
2. Ground control points, Bench mark established in the lease is to be detailed based on which updated survey has been done.
3. Status of statutory clearance like EC, CTO, CTE etc. be furnished along with permission to carry out mechanised mining under rule 106 (2)(b) of MMR 1961.
4. Original copies of Consent Letter, Certificates, Undertakings should be submitted.
5. Geo-co-ordinates of lease boundary pillars authenticated by State Government authority in compliance of CCOM circular 2/2010 should be submitted
6. The following details needs to be incorporated/corrected in para 2.0. B, item no. vii,
 - i. Public road passing through the lease area connecting Chinayapallem and Tangeda villages to access the lease
 - ii. The Mining lease shares its boundary with Tangeda Reserve Forest’ as per your submitted key plan the same should be described correctly .

iii. Review of Mining Plan

7. Submit the actual year in which exploration had been done.
8. Deviation is noticed in the area proposed for excavation and that of actual carried out, top soil generation, reason for the same to be furnished with justification.
9. Production reported and that of submitted in the Annual return for last plan period i.e. 2016-17 to 2018-19, are not in consonance with each other, needs clarification.
10. Review should be carried out as per the proposals made in the earlier approved document, for easy reference.
11. In Para 3.2 details of modified Mining plan approved on last occasion be furnished with reasons for modification.
12. Details of violation pointed out by IBM and present status of compliance be recorded with supporting documents.
13. Details of top soil generation, stacking/ utilisation be furnished.

Geology

14. Reserves have been enhanced based on the additional bore holes drilled cannot be considered for the following reasons
 - i. Meter wise analysis of samples has not been done and analysis of 10% of the total samples from NABL accredited lab is also not carried out
 - ii. Details of lithologs stated in Form J and that of core logs are different.
 - iii. Public road/ Village Road passing through the lease area & its safety zone is considered while assessment of reserves, which is incorrect as per statute.
15. Phase wise exploration carried out in the lease area should have been furnished in para “Exploratory drilling” in tabular form incorporating no. of bore holes, year of drilling, total meterage, type of drilling (DTH/ Core), angular/ vertical, maximum and Minimum depth etc. Further, details of all bore holes drilled so far should be submitted in tabular form incorporating Bore hole no., location (Lat/ Long), collar RL, Depth at which ore encountered/ exhausted from surface, angular/ vertical, core recovery% 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.

16. Actual Cost incurred in respect exploration carried out be furnished with documentary evidence.
17. Chemical composition of different litho units available in the lease area be furnished.
18. Reserves should have been re-assessed considering
 - i. Pit layout for bench development.
 - ii. By defining the UPL, Threshold value and Cut off grade of ore.
 - iii. Lease period.
 - iv. Ground water table encountered.

Thus, Reserves/ Resources need to be re-assessed considering all above also and as per MEMC Rules 2015 .

19. Bench wise & section wise computation of Reserves/ Resources be assessed and furnished.
20. There is increase in total resources for the lease from 262 million tonnes to 329 million tonnes, which needs clarification.

Mining/ year wise production:

21. Present status of pit dimension incorporating no. of benches with RL, bench height & width, Pit bottom etc. be furnished in tabular form.
22. In the year wise plan balance period of the year 2019-20 be computed and furnished, the position of the pit as on 01.04.2019 be shown by dotted line.
23. Utilisation of top soil generated in the proposed area of development to be elaborated in detail.
24. Bench RL's be furnished instead of stating Bench no. 1,2,3.
25. Control blasting technique proposed to be adopted needs to be detailed in view of existence of Village, Public Road, Reserve Forest area nearby lease.

Conceptual Plan

26. In conceptual plan only 93.379 million tonnes of reserves were considered, whereas in Geology chapter 233 Million tonnes are considered under Mineable reserves, which are contradictory, Please justify
27. Generation of Top Soil, its utilisation for reclamation and rehabilitation at the end of this plan period as well as at conceptual period be assessed and submitted, the same be depicted in conceptual plan.

Drainage

28. Proposal be submitted to assess the ground water table.
29. As per earlier approved document depth of water table is stated to be 3 meters to 25 meters below ground profile whereas in present submission the same is stated as 60 meters below, needs clarification.

Stacking of overburden and mineral Reject

30. There exist old low grade dump on western side of the lease area, details of the same should be furnished.

PMCP

31. Details of monitoring station in respect of Air, Water , Noise be furnished.
32. In Financial Assurance table :
 - i. Area under excavation need to be re-assessed
 - ii. 'Low grade dump' is considered as 'waste dump', which is incorrect.

Plans and sections

33. 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.
34. Surface Plan submitted is not updated with actual field condition: During inspection of mines it is observed that
 - i. Village road is passing through the lease area is not marked distinctly with buffer zone as per statute.
 - ii. Greenery is developed in substantial area of lease, but the same is not depictedThus surface Plan should be submitted incorporating all the details distinctly as per lease sketch., like Village/ Public Road, ML not granted areas, etc. to be marked distinctly

35. Surface Geological plan should have been submitted on 1 :4000 scale instead of 1 :2000 for easy handling. Area under different levels of exploration be marked as per Geological axis of UNFC.
36. Geological plan and Section: Geologist appointed under rule 55 of MCDR 2017 should have put his signature.
37. Geological section should be submitted indicating distinctly; Bench RLs, bore hole details (Collar RL, Depth), UPL, Grid Lines across the section etc.
38. Conceptual plan: Details of reclamation and Rehabilitation at conceptual stage, top soil management etc. be marked.
39. Reclamation plan:
Details of Top soil management, Mined out area for the plan period, Afforestation, bacfilled, if any, be marked.
40. In view of the comments above relevant para, plans and section should be suitably modified and submitted.



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Room No.603, 6th Floor,
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Date.

To
Sri P.Shiva Kumar,Nominated Owner
M/s Bhavya Cements Limited,
Plot No.A-1,Bhavya's Spoorthy Bhavan,
Jubilee Hills,
Film Nagar,
Hyderabad-500 003.

Sub: Submission of draft Review of Mining Plan in respect of Bhavya Limestone Mine of M/s Bhavya Cement Ltd., over an extent of 346.32 ha in Tangeda village, Dachepalli Mandal, Guntur dist., A.P. submitted under Rule 17(2) of MCR, 2016.

Ref: Your letter no.Nil dated 22.01.2020.

Sir,

With reference to your letter cited above on the subject, inspection of the mine was carried out on 01.02.2020 by Shri Ibrahim Sharief, Sr.ACOM accompanied by Sri V.T.Chander, Qualified person and Sri Ramakrishna,Mines Manager and found certain deficiencies in the form of scrutiny comments as given in Annexure. The same scrutiny comments have been forwarded to you and your Qualified Person on e.mail ids i.e. info@bhavyacementes.in, ccgeoengg@yahoo.com and ccgeoengg@gmail.com.

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,

Sd/-

(Shailendra Kumar)
Regional Controller of Mines

Copy to Sri V.T.Chander,Qualified Person for information and necessary action.

Sd/-

(Shailendra Kumar)
Regional Controller of Mines

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