



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



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Room No.603, 6<sup>th</sup> Floor,  
CGO Towers, Kavadiguda,  
Secunderabad – 500 080  
Date :14.06.2022.

To  
Shri D.Lakshmi Kantham, Nominated Owner,  
M/s Penna Cement Industries Ltd.,  
Lakshmi Nivas 705, Road No. 3,  
Banjara Hills,  
Hyderabad-500034,  
Telangana State.

Sub: Submission of Modified Mining Plan in respect of Amalgamated Gudipadu Limestone Mine of M/s Penna Cement Industries Ltd. over an extent of 421.096 ha. situated in Gudipadu and Kundanakota Villages, Yadiki Mandal, Anantapur District, Andhra Pradesh State submitted under Rule 17(3) of MCR, 2016.

Ref: Your Email dated 31.05.2022.

Sir,

With reference to your letter cited above on the subject, the draft Modified Mining plan is examined and the site inspection was carried out on 08.06.2022 by Shri Kalmata, M.K, RMG accompanied by Shri Naveen Kumar Reddy, Mines representative and Shri M.Pratap Reddy, Qualified Person and found certain deficiencies as given in Annexure. The same has been forwarded to you and your Qualified Person on respective e.mail ids i.e., dlkantham@pennacement.com and reddypratap1959@gmail.com.

02. You are advised to attend the 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 (4Nos.). 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.Five 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 Sri. M.Pratap Reddy, Qualified Person, Flat No. 404, House No: 3-3-66, Shikara Heights, Besides SVS Nuero Hospital, Kachiguda, Hyderabad – 500 027, TS., Qualified Person for information & necessary action.

(Shailendra Kumar)

Regional Controller of Mines

मूल पति पर नहीं

खान नियंत्रक (द), भारतीय खान व्यूरो, बैंगलुरु।

(शैलेंद्र कुमार)

क्षेत्रीय खान नियंत्रक

**Scrutiny commentson examination of draft Modification in approved mining plansubmitted under rule 17(3) of MCR 2016 in respect of Amalgamated Gudipadu-Kundanakota Limestone mine, over an extent of421.096Ha, in Gudipadu-Kundanakotavillages, Yadiki- Mandal,Anathapur-District of Andhra Pradesh.**

- 1) General:** -i)The Land survey numbers mentioned on the cover page are not matching with the survey numbers mentioned In the Amalgamated lease deed.  
ii)On cover page, details which are mentioned between block period and lease period details should be removed.  
iii)As per the office record the mine code allotted for the Amalgamated lease is 38APR02049, but on cover page mine code is mentioned as 38APR02053 &at para 1.1, under lease details the mine code is mentioned as 38APR04017, this need to be corrected. The mine code should be corrected in all the relevant pages.  
iv) The amalgamated lease was executed on13.12.2019, but para 1.1.1, date of execution is mentioned as 8.07.2019, this need to be corrected. Further, under heading grant, along with first extension, amalgamation of the leases may also be mentioned. The column showing lease registration date is kept blank.  
v) At para 1.1.2, reason for enhancement of the production from 3.2 million tons to 4.5 million tons should be properly justified with technically supporting documents as discussed during field visit.  
vi) Copy of PAN card of owner and QP may be enclosed as annexure.  
vii) As per Rule 34A (3) of MCDR Amendment Rules 2021, Every lessee shall carry out a drone survey of his leased area and upto hundred metres outside the lease boundary within six months before submission of any mining plan document or modification thereto to the Indian Bureau of Mines for approval and shall submit processed output [digital elevation model (DEM) and Orthomosaic images obtained from such survey or any other format as per the SOP issued by the Indian Bureau of Mines in this regard to the concerned Regional Controller of Mines and the Controller General along with the application for approval or modification of mining plan: Accordingly, DEM and Orthomosaic images along with shape files of proposed workings, dumps, plantations etc. should be submitted along with the final copies.  
viii) Comparing surface plan of last approved document, the R. L's shown in the working pits are increasing. This need to be rechecked.

- 1A) Feasibility Report:** - i) The reserve/resources should be updated as per the scrutiny comments given in the Geology and exploration chapter.
- ii) Calculations showing economic viability of the project is not discussed in the feasibility report.
- 2) Geology and exploration:** -i) The highest and lowest levels shown under para 2.1.1 are not matching with the RL's mentioned on the surface plan.
- ii) One cart road is existing within the lease area and same is not shown in the table given at para 2.1.2. Further, on key plan total five village shown within 5.00kms from the lease boundary, but at para 2.1.2 only one village is mentioned.
- iii) Under local geology, amount of strike of the formation with respect to direction should be given. In draft submission only direction is mentioned. Further, on surface Geological plan, dip amount is shown varies from 2 to 4°, but in text dip amount is mentioned as only 2°.
- iv) At para 2.1.4.7, number of ore bands existing within the lease area with dimension need to be discussed.
- v) At para 2.1.4.8, amount of dip and strike is not mentioned.
- vi) The surface Geological plan is prepared in 1:5000 Scale, but at para 2.2.1.1 and 2.2.2.1, scale of the geological plan is mentioned as 3.51 and 1.43, this needs to be rechecked and corrected.
- vii) At para 2.2.1 to 2.2.1.14, only details of exploration, mapping, chemical analysis, etc. carried out during last plan period need to be discussed. In the draft submission details of past is given, which is not correct.
- viii) The exploration carried out before last plan period should be discussed at para 2.2.2 to 2.2.2.14.
- ix) At para 2.2.1.14, area explored under G-1 level is shown as 421.096Ha, but at para 2.2.2.14, same area is shown under G-2 level. This needs to be rechecked and corrected.
- x) The bulk density and recovery factors taken for estimation of reserves/resources should be based on the test conducted by NABL accredited lab.
- xi) Ore which are blocked due to roads/nallahs should be estimated under remaining resources. Barrier of cart road are estimated under reserve category.
- xii) Lateral extension from the extreme boreholes cannot be considered for estimation of reserves under proved and probable category. The lateral

extension to be considered for resource assessment shall depend on geological considerations supplemented by geological continuity by mapping or by other means and in any case shall not be more than 50% of the grid spacing of the probe points. Accordingly reserves/resources need to be re-estimated.

xiii) In the last approved document dated 24.08.2020, mineable reserves were shown as 180.92 million tonnes, remaining resources 50.54 million tones and Total as **231.46** million tonnes, and in the present submission, mineable reserves are mentioned as **173.2405** million tonnes and remaining resources **183.205** million tonnes and Total as **356.4455** million tonnes. Increase in the estimation of total resources without doing any additional exploration need to be justified, for further consideration.

xiv) Unit of reserve estimation is not mentioned in the table given at para 2.2.4.13. Further in the table given at para 2.2.4.13, grade of the ore should be mentioned as minimum, maximum and average (weighted).

xv) Scale of the proposed geological mapping given at para 2.2.5.1 needs to be rechecked and corrected.

xvi) From the borehole data it is observed that most of the boreholes are ended in the ore zone only, so exploration proposals up to the discontinuity of the ore body should be proposed as discussed during field visit.

3) Mineral Beneficiation/processing: -i) In this chapter the mineral beneficiation/ processing technologies adopted only needs to be discussed.

4) Mining: -i) During field visit two mineral reject dumps were observed, one in the Southern part of the lease area near BP No-5 to 8 and second one is existing near Southern part of Pit No-1 (Mineral reject mix with soil). However, 4.2.1.2.2, detail of only one dump is given.

ii) The proposed benches shown on the production and development plan and details given in the text are mismatching. Further, it appears area marked on the plan and sections are not matching with the proposed quantity of excavation. So, pit design needs to be rechecked with respect to year wise proposed production quantity. Further, the existing bench levels and proposed level are not matching.

iii) At para 4.2.2.2, under bench parameter, instead of writing surface level. Existing R.L. should be mentioned.

iv) Necessary studies which are mentioned at para 4.3.1 needs to be carried out and copies of the reports should be enclosed as annexure.

- v) In the introduction chapter it is mentioned that enhancement of the production will be 3.2 to 4.5 million tones, but in the mining, chapter proposed production in the year 2023-24 is shown 125 tonnes more. The proposed production should not be more than the proposed EC limit.
- vi) Topsoil is not a waste but at para 4.3.2, topsoil is shown as waste and considered for calculation of Ore to OB ratio. The topsoil should be removed separately and properly utilized for reclamation and rehabilitation of the waste land and worked out area within the lease area or should be stored separately for future use. The topsoil should not be taken for calculation of Ore to OB ratio.
- vii) At 4.7.3, stack position needs to be updated as per the scrutiny comments given in the first point of mining chapter.
- 5) **Sustainable Mining:** -i) A brief note on proposed year wise CSR activities as discussed during field visit should be enclosed as annexure.
- 6) **Progressive Mine closure Plan:** - i) During field visit it was observed that two old mineral reject dumps are existing within the lease area but at para 6.1, one is shown under dump and other as stack. This needs to be corrected. Further, the area covered under stacks is not matching with the field observation. The area covered under different heads should be updated based on the latest survey.  
ii) Retaining walls around the existing old mineral stacks, drains along the haulage roads, garland drains around the old dumps may be proposed as discussed during field visit.  
iii) At para 6.2.11, area remain undisturbed/ virgin is not shown, further, details of dumps need to be corrected as per the previous scrutiny comment. Further, except green belt development in the virgin area, nothing is shown for reclamation and rehabilitation of the mined-out pits, old dumps etc. This needs to be justified.
- 7) **Financial assurance/performance surety:** -i) In the last approved document, area under mineral storage was shown as 3.32Ha, under Roads 4.5Ha and green belt 13.30Ha , however, area covered under mineral storage and roads is shown less and same cannot be considered. Area considered for financial assurance should be calculated based on the latest survey, as discussed during field visit.

ii) Year and area put use given in the table need to be rechecked and corrected. Amount of Financial assurance need to be re-estimated as discussed in the above scrutiny comment and validity of F.A should be co-terminus with the plan period. Accordingly, corrections should be made.

**8) Review of Previous proposals:** -i) The last document (MMP) was approved for the period 2020-21 to 2023-24. So, in the review chapter only proposals and actual achievements made during the year 2020-21 and 2021-22 need to be discussed. The details should be given year wise.

ii) The actual land use details are varying from page to page, this need to be corrected based on the latest survey as discussed in the Mining chapter and PMCP chapter.

iii) The co-ordinates of the proposed workings and actual working carried out should be updated based on the latest survey as discussed during the field visit.

**Plans and sections: -**

**1) Surface Plan:-**i) Signature of surveyor with date, Manager, QP's signature is not there on the surface plan. ii) Dump bottom levels are not mentioned and type of the dump should be mentioned. Further, during field visit it was observed that mineral dump which is existing near BP no-5 to 8 was extended beyond 7.5 mtrs safety zone, however on the plans it is shown within 7.5 mtrs this need to be corrected. iii) Existing bench top and bench bottom should be properly shown with R. L's . and font size of the R. L's should be increased for easy reference.

**2) Geological plan and sections: -** i)UNFC codes shown on cross sections should be modified as per the scrutiny comments given in geology and exploration chapter for re-estimation of the reserves/resources. ii)On some of the sections lithology shown is not match with the surface geological plan. iii)Section lines are not labelled in sequential order and details mentioned on section lines are not readable. iv) Proposed exploratory boreholes are not shown on the surface geological plan. v) Most of the area is covered with topsoil, but same is not shown on the surface geological plan

**3) Production and development plan and sections: -**i) Production and development plans should be prepared on 2000 scale. ii) The Proposed R. L's are not properly connected to existing R. L's. This need to be rechecked and corrected. iii) Proposed benches with top and bottom RL'S should be properly marked on plan and sections. iv) Proposed working proposals marked on plan and sections are not

matching, this need to be corrected. Proposed RLS are not marked on production and development sections.

- 4) **Financial assurance plan:-i)** The area considered for financial assurance mentioned in the text and plan are mismatching. ii) Area considered for financial assurance under different heads should be properly shown with different color codes/ patterns for easy identification and same should be indexed.
- 5) **Conceptual plan&sections:-i)** On conceptual plan working is shown almost only 50 % of the lease area, this needs to be justified. and on conceptual sections proposed benches up to the conceptual period are not shown. ii) Measures taken for reclamation and rehabilitation of worked out pits, dumps etc. are not shown on conceptual plan and sections. iii) Table showing land use pattern at present, at the end of 5-year plan period and conceptual period should be shown on conceptual plan.
- 6) **Reclamation plan:-i)** Plantation proposed for the year 2022-23 was not shown on the plan.
- 7) **Environment plan:** -i) Environmental plan should be prepared incorporating all the points, given in Rule 32(5)(b) of MCDR-2017. Further, existing plantation within the lease area within core and buffer zone should be shown. ii) Other mining leases, agricultural lands and any other features existing within 500 mtrs should be shown as discussed during the field visit.