

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

No. 659(549)Lst/2007/Hyd.

Room No.603, 6th Floor,
CGO Towers,Kavadiguda,
Secunderabad.-50008
Date: 21.6.2019

To,
Shri J.J.Reddy,Nominated Owner,
M/s Bharathi Cement Corporation Ltd.,
8-6-626, Reliance Majestic,
Road No.2, Banjara Hills,
Hyderabad-500 034.
T.S.

Sub: Submission of modification of Mining Plan in respect of Bharathi Limestone Mine of M/s Bharathi Cement Corporation Ltd., over an extent of 632.278Ha. Situated in T.Sunkesula & Tippalur of Yerraguntla Mandal and Nallalingayapalli,thurakapalli,Sadipiralla,Jambapuram of Kamalapuram Mandal of YSR Kadapa dist., A.P. submitted under Rule 17(3) of MCR, 2016.

Ref: Your letter no. BCCPL/MINES/IBM/2019-30, dated 20.5.2019.

Sir,

With reference to your letter cited above on the subject, the scrutiny of the draft modification of Mining Plan has since been examined based on the previous inspection carried out by Sri Ibrahim Sharief, Sr. ACOM of this office on 13.2.2019 and found certain deficiencies as given in Annexure. The same scrutiny comments have already been forwarded to you and your Qualified Person on respective e.mail ids i.e.,sudhakar.k@vicat.com, nagarajarao.k@vicat.com and vijayakumar.v@vicat.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 to 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,


(SHAIENDRA KUMAR)
Regional Controller of Mines

Copy to :
Shri K.Nagaraja Rao and Shri. V.Vijaya Bhaskar, Qualified persons


(SHAIENDRA KUMAR)
Regional Controller of Mines

NOO: Copy to Controller Of Mines(SZ), IBM, Bangalore.


(SHAIENDRA KUMAR)
Regional Controller of Mines

Inspection report cum scrutiny comment on the Review of Mining Plan submitted by M/s Bharathi Cement Corp's Limited for It's Limestone Mine admeasuring 632.78 hectare at Yerraguntla Manadal, Kadapa.

Introduction :

1. The entire chapter on Introduction be re-casted. It may contain a paragraph containing the information related to installed Plant capacity, It's limestone requirement and broad sourcing of limestone for the purpose from mine/ mines.
2. As per MCR, document should be submitted by one person i.e, Qualified person only and not the qualified persons.
3. Cadastral map/ Khasara map indicating Lease boundary and survey nos. should be submitted.
4. Lease area should have been submitted after carved out of area surrendered earlier and accepted by State Government.
5. Please clarify the status of lessee/ company:
Refer page no.6, You have submitted the certificate of incorporation of the company as per the company's Act, pertains to two different entities with common CIN No and same date of incorporation
 1. It is noted in 'Annexure -9' Name change is from Raghuram Cements Limited to Bharathi Cement Corporation limited.
 2. 'Annexure 11' States about : Name change of company from Raghuram Cements and Minerals Private Limited to Bharathi Cement Corporation limited and conversion of the limited company in to private limited company as Bharathi Cement Corporation Private limited.
 3. Lease was initially granted by State Government vide GO Ms no. 95 dated 27/03/2006 to Raghuram Cements Limited and also accepted change of name of the company/ lessee to Bharathi Cement Corporation limited vide its G.O Ms No. 54 dated 13.02.2009, but lease deed is not yet executed so for.
 4. As per ministry of corporate affairs website the CIN no. is pertains to Bharathi Cement Corporation Private limited.
In this regard, you are advised to clarify actual status of company/ lessee as per statute.
6. Justification of submitting modification in approved review of mining plan should be further elaborated and justified with plausible reasons
7. Details of valid leases pertaining to the lessee should only be submitted in page no. 4.
8. Updated List of Board of Directors of the company should be submitted.
9. Resolution of Board of Director of the company to authorize person as Nominated owner to sign the document under MMDR Act 1957 should be submitted.
10. Copy of Environment clearance enclosed as annexure is not legible. Here it is advised to submit all the annexure with this document should be legible for verification.
11. Compliance status of EC condition should be furnished.

General :

12. Details of Land schedule of the lease area should be furnished as per Lease deed only.
13. In Table no.3, details regarding khasra no/ Plot no. are not furnished.

Review of Mining :

14. In item 3.3, only proposal vs achievement be submitted and other unnecessary information be removed. Similarly for the review of reclamation and rehabilitation it should be submitted clearly the proposal vs. backfilling has been done.
15. There was no proposal of backfilling of top soil in the earlier approved document, instead it is for stocking of top soil temporarily in the pit and will be utilized for afforestation, hence review should be modified as per earlier approved document only. Further there is no mineral exhausted in the lease area so for therefore backfilling proposal specifically the 'top soil' cannot be used for backfilling of the pit and cannot be acceptable.
16. Deviation in development/ exploitation than the approved proposals are observed, the same may be furnished in review chapter.

Geology :

17. Regional Geology of the area should be furnished in detail.
18. Reserves/ resources should be reassessed considering the water table as there is no permission to work below water table in EC condition. In the earlier approved document Silicious Limestone/ Flaggy limestone has not been considered under resources category as it is having

- more silica content but in the present submission the same is considered under resources without any basis, need clarification.
19. In Sections 10-10', 14-14' and 18-18' quarries are intersected but the same is not considered in reserve estimation and the same is not depicted in sections.
 20. Depth persistence of to ore/ waste encountered in bore hole should have been furnished in tabular form.
 21. UPL should be properly demarcated in relevant plans and sections.
 22. Exploration carried out in the lease area under G1, G2, G3 level should be furnished in tabular columns.
 23. As no exploration proposal is furnished in the present submission, please comment about compliance of rule 12(4) of MCDR 2017 to carry out exploration up to G1 level in the lease area.
 24. Cost of exploration furnished should be supported with documentary evidence.
 25. All the backup calculations for assessment of reserves/ resources should be furnished in the annexures only and duly signed by the Geologist appointed as per statute and Qualified person.
 26. The plans should be prepared on the same grid lines as submitted in the last approved document..
 27. In the Geological plan location of the boreholes be checked and correctly plotted.
 28. Every plan, section or part thereof prepared under these rules shall be signed by the mining engineer with date.
 29. The geological plans and sections shall be certified and signed by the geologist employed under rule 55.
 30. The strike and dip be plotted. The geological sections should be drawn across the strike to delineate the ore body.
 31. In para 1.0(k) , (iii), submit the feasibility report in annexure covering the information on Capital Cost, economic evaluation etc. and unnecessary information be removed.
 32. In para 1.0k , the comment on linking of maps prepared with national grid, benchmark.

Mining :

33. The document submitted is modification to the earlier approved RMP and production proposal is same as earlier approved document, where as more area is proposed for degradation/ exploitation. In this regard proposal should be furnished from one end of lease to other end by exploitation entire mineralized zone considering optimum utilization of ore, hence proposals within the approved area should be furnished.
34. Details of extent of pit incorporating no. of benches in ore, top soil and details of waste dump with top/ Bottom RL, no. of terraces etc. should be furnished in tabular form.
35. Control balsting technique adopted for exploitation of ore should be detailed, as there exist Highway, Village road, Nala etc. nearby the mines, for safe and scientific mining operation.
36. As per the earlier approved document there is no overburden exist in the lease area, entire top layer above LIMESTONE is Block Cotton soil. Where as in the present submission the same is considered as 'OB' and proposal is furnished for backfilling. Which cannot be acceptable.
37. The Yearwise top soil generation planning be given as

| TOPSOIL EXCAVATION PLANNING | | | | | |
|-----------------------------|--------------------|------------------|------------------------|-----------------|--------------------------|
| Year | Operating Gridline | Operating Levels | Area in M ² | Thickness in Mt | Volume in M ³ |

38. The benchwise weighted average grade of proposed mining block for each year needs to be furnished and the yearly weighted average grade should be close to the average grade of deposit for optimum exploitation of the mineral. The mechanism for the grade control for optimum utilization of mineral along with blending techniques needs to be furnished.
39. All the backup calculation for year wise production should be given in annexures only with signature of Qualified person .
40. The yearwise proposal for top soil stcking be given on the footwall side within the lease only.

Conceptual Mining Plan :

41. Submit the life of the mine as per the assessed resources/ resources and 5 MTPA as rated production of limestone from the mine.
42. The conceptual pit development, top soil generation and its utilisation and afforestation be assessed at the end of lease period.
43. For the reclamation , the use of top soil for backfilling is not correct. It should be use for stabilization of top benches at it's ultimate position where water harvesting is not proposed.

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Mine Drainage :

44. The temporary stacking of top soil stack be proposed on footwall side It's use as backfilling is not accepted.

Progressive Mine Closure Plan :

45. In para 8.1, The base line data be submitted as per MoEF guidelines. Incorrect submission regarding water regime be corrected.
46. In para 8.2, submit the impact assessed during the last 1 year. Clearly submit whether the observations were within the permissible limits or not.
47. In para 8.3 regarding reclamation plan, table 49 , topsoil management be corrected as per scrutiny comments.
48. In para 8.3.5 yearwise proposal for reclamation has not been filled . Needs correction. The gfarland drain and retaining wall be proposed at the toe of top soil dump as per requirement . The reclamation proposal be shown on the reclamation plan.
49. 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.