



भारत सरकार Government of India
खान मंत्रालय Ministry of Mines
भारतीय खान ब्यूरो Indian Bureau of Mines
क्षेत्रीय खान नियंत्रक का कार्यालय Office of the Regional Controller of Mines
100, ओल्डनेहरू कालोनी, देहरादून (उत्तराखण्ड) 248001 /100 Old Nehru Colony, Dehradun (U.K.) 248001
TEL- 0135-2676350 / 2671896, E-mail – ro.dehradun@ibm.gov.in



फाईल संख्या File No: 614(2)/MP-B-271/16-DDN

देहरादून , दिनांक 06-05-2022

सेवा में/ To : श्री विनोद कुमार जैन

e-mail: Jmtcvk73@gmail.com

3 फेज, 43, प्रभात नगर, हिरन मगरि

सेक्टर 11, उदयपुर (राजस्थान)

विषय/Sub: Scrutiny comments, indicating incomplete details /information/ inconsistencies / deficiencies etc in submitted Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of mining lease area (Nohradhar Limestone Mine) over an area of 4.98 ha in Village-Nohradhar, Tehsil-Nohradhar, District- Sirmour, of Himachal Pradesh, submitted under Rule 17(2) of Minerals (Other than Atomic & Hydro Carbons Energy Minerals) Concession Rules, 2016 & 23 of MCDR 2017

संदर्भ/Ref. : Letter from Mining lease holder vide No.Nil dated 23-02-2022 received by this office on 25-03-2022.

महोदय/ Sir,

This office is in receipt of one copy of the above-mentioned initial/draft Review and Updation of Mining Plan including Progressive Mine Closure Plan, hereinafter refer as RMP, through soft copy/online received on 25.03.2022. The mine has been inspected by Shri S. Saklani, JMG and after subsequent examination of the document various discrepancies/deficiencies/inconsistencies/gaps were observed which is being listed in enclosure to this letter as **scrutiny comments**. Same copy of the RMP has also been forwarded to the State DMG for it's comments, if any. In case of any comments from the State Government received to this office the same shall be communicated to you for action at your end.

You are advised to rectify the document and submit the RMP afresh in **soft copy** (including in Two CDs) **as well as Three (3) HARD BOUND copies along with hard copies of plates as per circular No. 1/2021** within **15 days** from the date of issue of this letter as per the new format including the checklist (hard copy, changes to be made in scrutiny point wise) along with **Financial Assurance in the form of BG as prescribed under Rule 27 of MCDR Amendment Rules, 2021.**

In view of late submission of aforesaid mining plan under Rule 17(2) of M(OAHCEM)CR 2016, late fee has laibable to be paid as per Rule 62(2) read with Schedule III of MCDR Amendment Rules 2021.

If the afresh/fair copies of RMP including Progressive Mine Closure Plan is not received at this office within stipulated time then final action will be taken appropriately. Please ensure that the details and reason/justification regarding scrutiny comments be given along with page numbers/plte no./annexure no./ etc where it is incorporated in the document.

This is issued with the approval of competent authority.

Encl: as above.

भवदीय Yours faithfully,

(Signature)
06.05.2022

(दामोदर प्रसाद शर्मा /D P Sharma)

सहायक खान नियंत्रक /Assistant Controller of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर (zo.udaipur@ibm.gov.in)
- 2- रूप सिंह चौहान पुत्र स्व. श्री केहर सिंह, गांव व पोस्ट व तहसील-नोहराधर , जिला सिरमौर , हिमाचल प्रदेश (harryparwinder@gmail.com)

सहायक खान नियंत्रक /Assistant Controller of Mines

Scrutiny comments, indicating incomplete details /information/inconsistencies / deficiencies etc in initial/draft submission of Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Nohradhar Limestone Mine, Mining lease over an area of 4.98 hectares located near Village-Nohradhar, Tehsil- Nohradhar, District-Sirmour of HP submitted by Shri Roop Singh Chauhan under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2022-23 to 2026-27.

- 1) The submission letter of document must be submitted under the Signature of lessee only as the responsibility lies with him only.
- 2) The validity of letter regarding the extension of lease period as per MMDR Act has expired and the fresh executed lease deed is not found. So document in support of validity of lease period , issue by State Government for the present period be submitted. In Para 1.1.1, date of Grant need to be corrected as per Govt. Order. Lease registration date may be mentioned.

Chapter-1, General information:

- 3) Para 1.1, Lease area should also be given in bigha along with conversion tables for the same be enclosed as annexure.
- 4) Para 1.1, type of lease be mentioned either fresh grant or existing lease as per dropdown list in the format.
- 5) Para 1.1, Nature of use, Please mention exact word as per format either captive or non-captive. No other word shall be inserted. Mention as per dropdown list in the format.
- 6) Para 1.3.1 & 1.3.2, details given under partial surrender area is not found w.r.t FMCP approval.
- 7) Para 1.3.4.1 & Para 1.3.4.2, The data for Environment Clearance and SPCB approval has been submitted regarding M/s Janki Mines and Minerals whereas the lease belongs to Roop Singh Chouhan.
- 8) Incongruity has been observed with regard to lease shape submitted in plans. So you are advised to submit the boundary pillar coordinates authenticated by the Competent authority of State Government. Ensure that lease plan shown in plans must corroborate with lease sketch provided by State Government as well as lease shape as per coordinates.

Chapter-2, Geology and Exploration:

- 9) In the last plan period no exploration has been evidenced. It has been noted that 1 exploratory pit had been done prior to the last plan period, i.e. in 1994-95. Further, In Para 2.2.2.7, 3 bore holes have been reported in 2012 which cannot be validated now, hence be removed. Thus the document has been developed on the basis of incorrect geological inputs for development of geological sections and calculation of reserves and resources as per MEMC Rules. How the quantity and quality of the ore body has been assessed based on just one pit , please clarify. Area under different levels of exploration (G1, G2, G3, G4) for mineralized land be assessed correctly.
- 10) PWD road, nearest railway & Airport need to be checked & corrected.
- 11) Para 2.1.4, structural configuration to be checked thoroughly.
- 12) Para 2.1.4.8, Amount of dip (9 to 12 degree) mentioned in text is not in consonance with plates. Corresponding correction be done in Para 2.2.3.
- 13) Para 2.2.1.3 & 2.2.2.3, details are not as per format.
- 14) Para 2.2.1.5, the dimensions of pits in the plan/.kml & text are not matching.
- 15) Para 2.2.1.7, during last plan period, 5 bore holes were proposed to be carried out but the compliance of the same is not evident. Exploration carried out in last 5 years is submitted as NIL.
- 16) Para 2.2.1.14 & 2.2.2.14 & 2.2.5.2, without exploration done, Area covered under exploration for last plan period and before last plan period has been given same which needs review. The entire lease area has considered under G1 but the basis thereof has not been reflected in the text or plate.
- 17) Para 2.2.2.13, proof for bulk density shall be enclosed.
- 18) Para 2.2.4.8, Feasibility report be submitted.
- 19) Para 2.2.4.13, this table is not matching with above both R&R calculation tables which needs review.
- 20) The lessee has not undertaken exploration as per rule 12(3) of MCDR 2017. Time bound schedule for correction of violation be proposed. Future exploration proposals shall be invariably demarcated in the surface geological plan (.kml/.pdf/hard copy).
- 21) UPL and blocked resource need to be reassessed scientifically.

Chapter-4, Mining:

- 22) Development and production proposals shall be in line with planning submitted in the previous approved proposals.
- 23) As per the plates , dump has extended out of the lease area, which is not as per approved proposal. Waste dump is discussed in Para 4.2.1.2 in this chapter but as per plans stacks are demarcated which needs review.
- 24) Given pit dimension is not matching with area covered by pit and also not matching with as per field observation.

- 25) Para 4.2.2.1, 5 m bench width is not feasible for mechanised mining.
- 26) Separate bench wise details in yearwise proposals for the period shall be incorporated.
- 27) Para 4.2.2.1, slope of the bench to overall bench slope is found imaginary.
- 28) Para 4.4.1, material handling required per day is found incorrect. Correct it.
- 29) Machine calculation especially requirement of tipper/dumper is not found meeting with requisite production.
- 30) **Para 4.4.4, at the beginning of the chapter, method of mining is given as HEMM with deep hole drilling but without having a drill machine and blasting proposal, it cannot be implemented. The proposal needs to be reexamined.**
- 31) Para 4.7.1, existing dumps details are not furnished as given in 4.2.1.2
- 32) **Chapter-5, Sustainable Mining:**
- 33) Efforts for green energy and water & its recycling may be proposed. Proposals in sustainable mining may consonant with existing star rating template.
- 34) **Chapter-6, PMCP:**
- 35) Area under dumps be checked with mining chapter. Correct it accordingly.
- 36) Para 6.2.2.2.1 & 2 & 3, being a steep hilly mining area, adequate retaining wall and sufficient garland drain along eastern side of lease area and along haul road shall be proposed as not evidenced on perusal of plan.
- 37) Para 6.2.3.1, plantation details are not in line with PMCP data submitted to this office.
- 38) Para 6.2.11, As per the Hon'ble Supreme Court of India order dated 08/01/2020, re-grassing at degraded surface to be carried out. Accordingly, proposals may be furnished for restoration/reclamation/re-grassing of mined out area. Information shall be addressed in this PMCP chapter.
- 39) Para 6.2.11, total area degraded by the conceptual stage is not correct which needs review.
- 40) **Chapter-7, Financial Assurance:**
- 41) Existing area put to use in this chapter is not matching with PMCP chapter
- 42) In the first year only, additional put to use area is given whereas mining and development has been proposed for five years for which has been shown nil which needs review.
- 43) Validity be checked and changed accordingly.
- 44) Area under mining for the proposed plan is not found correct as per submitted .kml file. Entire total put to use area to be reviewed.
- 45) Area put to use for mining allied activities in view of above comments, review it again and accordingly the amount shall be submitted in the form of BG as per Rule 27 of MCDR Amendment Rules, 2021. Amount of BG for the total put to use area for this proposed plan period also found incorrect.
- 46) **Chapter-8, Review of previous proposals:**
- 47) **In Reason for deviation in exploration need to be corrected.**
- 48) **Existing area details are not in line with PMCP and FA chapters.**
- 49) **In Para 8.2.8.2, It has been submitted that lessee has undertaken 1382 samplings in PMCP chapter and here nil information is provided. however neither any dump nor benches of back-filled area is found thus incorrect submission has been made in the document.**
- 50) Para 8.1.1, existing lease area utilization is nowhere found matching with the details given in the previous chapters.
- 51) Para 8.2.6.1 to 8.2.7, year wise bifurcation of quantity/details to be given.
- 52) Para 8.1.2, Proofs for given expenditure figures may be annexed.
- Miscellaneous:**
- 53) It may be recorded that the adequate safety measures be taken as per THE OCCUPATIONAL SAFETY, HEALTH AND WORKING CONDITIONS CODE, 2020 will be implemented and necessary permissions will be taken from the authorities wherever required.
- 54) Copy of Study reports conducted as per Para 4.3.1 including latest monitoring report w.r.t drinking water potable test, Ambient Air Quality, noise level test, etc be enclosed and also proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco-sensitive zone.
- 55) All the proposals should be made within Mining lease only. Photographs of ML, PMCP activities shall be submitted.
- 56) **Soft copy and hard copy of the document are not in line with each other.**
- 57) **All the required annexure as per format are not submitted.**
- Plates:**
- 58) **Plates especially .kml files are not as per prescribed new format. Geo referenced Cadastral plan is not found submitted.**
- 59) **Plate No.3, in Surface Plan,**
- In the text it is mentioned that whole lease area is Govt. waste land but private land is found demarcated which needs justification.**
 - Surface features upto the lease boundary only be given in all plans except, environment plan.**

- c) All existing surface features like, existing land details, existing plantation, color coding shall be separated by each surface feature and shall be demarcated.
 - d) Annotation need be corrected as per MMR.
 - e) Coordinates of Ground control points are not found to be shown. In .kml file also 3 ground control points shall be shown
 - f) Highest and lowest mRL is not found which shall be demarcated.
 - g) Floor and spot mRL of developmental road and the pits from where the working has been done be given.
- 60) **Surface Geological Plan, Plate No.4:**
- a) UPL is not found in this plan.
 - b) Sections considered for estimation of R&R is found insufficient as influenced area at north and south is found left in consideration.
 - c) Blocked reserves under statutory boundary are shown with same color as at other G1 portion which is not correct.
 - d) Only 2 bore holes are marked whereas 3 were mentioned in the text. **Future excavation proposals shall be demarcated. All the existing exploratory proposals are not found demarcated as discussed in text.**
- 61) Plate No. 4A, all the geological and topographical features and all the borehole location are not depicted in these sections. Review sections along with SGP. UPL demarcation shall be reviewed again
- 62) **Plate Numbers up to 5A-5E, Year-wise development plans.**
- a) Development proposals shall be planned in consonance with previous approved plan. Approach road/link road to each bench is not found demarcated.
 - b) Proposals of benches are found not in line with contours.
 - c) Bench dimensions are not as described at text.
 - d) In fifth year plan, from first year to fourth year plantation and development of benches and other details in the plan shall be depicted with separate color.
 - e) No. of benches as mentioned in the text is found mismatching in the plans.
 - f) Direction of development proposals are not scientifically given
- 63) **Progressive Mine Closure plan both in .pdf and .kml and sections are not found submitted.**
- 64) **Environmental Plan:** Proposed plantation should be marked on Plan. All monitoring stations shall be demarcated in .kml file (deemed necessary as per provision of rules).
- 65) **Conceptual Plan and sections:** Review UPL with conceptual stage including said exploitation. Access road from top to bottom shall be demarcated. Benches of mRLs in conceptual sections are not matching with conceptual plan.
- 66) In view of aforesaid comments observed on area put to use and subsequent FA, Financial plan in support of calculation of FA area under rule 27 of MCDR Amendment Rules, 2021 shall be enclosed (deemed necessary).

General:

- 67) In view of Rule 34A(3) of MCDR Amendment Rules 2021, Every lessee shall carry out a drone survey of his leased area and upto hundred meters 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 may be specified 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.
- 68) In congruous submissions have been observed in various parts of the document; The Mining plan has not been furnished as per format i.e. the drop down list option has not been considered in entire document at various places. Ensure the congruity in submissions accordingly.
- 69) All the plates should be attested by qualified person, Surveyor, for their authenticity and shall be self-certified that plans and sections are based on the lease map authenticated by the State Govt./U.T Govt.
- 70) All the annexure should be attested by qualified person for their authenticity.
- 71) Two CDs covering the entire document and plans (.pdf and kml/shp files according to circular No.01/2021) along with Financial Assurance has to be enclosed at the time of final submission as per guidelines. Undertaking in this regard by qualified person should be given that the CD contains the same text & plates as submitted in hard copy except .kml files.
- 72) The layers showing different features with one layer for one feature have to be given for each of the plan in KML/KMZ. Output of the KML/KMZ file in .pdf file also has to be provided. Polygon feature shall be used as and when required in.kml file.

