



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
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फाईल संख्या File No: 614(2)/MS-B-214/12-DDN

देहरादून, दिनांक 10-06-2022

सेवा में/ To : श्री पंकज पाण्डे,

e-mail: sahajshahyog990@gmail.com

मैसर्स सहज सहयोग कंसल्टेंट प्राइवेट लिमिटेड,

अलीगंज, लखनऊ – यू.पी.

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 (Mattan Martand Limestone Mine) over an area of 4.844 ha in Village- Mattan Martand, Tehsil- Doru, District-Anantnag, Jammu & Kashmir-UT, 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 Nil received by this office on 25-04-2022.

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 25.04.2022. After subsequent examination of the document various discrepancies/deficiencies/in-consistencies/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 UT-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**.

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/plate 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,

(दीपक शर्मा /Deepak Sharma)

वरिष्ठ खनन भूविज्ञानी /Senior Mining Geologist

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुरा (zo.udaipur@ibm.gov.in)
- 2- Jahangir Ahmad Khan Prop. Bawan Minerals S/O Md. Rafiq Khan R/O Vill- Saliyaloo Qazigund, Teh.- Doru, Distt. - Anantnag, J&K - 192212 (cscbonigam@gmail.com)

वरिष्ठ खनन भूविज्ञानी /Senior Mining Geologist

Submission of Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Bharwana Limestone Mine, Mining lease over 4.844 an area of hectares located near Village-MattanMartand, Tehsil-Dooru, District-Anantnag, U/T Jammu & Kashmir of M/s Bawan Minerals Rule 17 of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2022-23 to 2026-27

1. As per the CCOM Circular 1/2021 and FAQ issued thereafter shall be adhered and whole document shall be digitally signature.
2. The review of mining plan is being submitted under A-category of working, as per the latest amendments financial assurance @ 5-lakhs INR per hectare is to be submitted in the form of bank guarantee with the validity of extended claim period six month from the plan proposal period under rule 27 of MCDR amendment rule 2021.
3. Status of the mining lease as on date is to be confirmed by the state govt.-
 - (i) As per the office records, it is found that the ML under temporary discontinuation from 03.01.2022 and has not reported production and dispatch since 2020-21 & 2021-22.
 - (ii) Supplementary lease deed not executed as per the Sec 8A of MMDR Act 1957. This lease prima-facie seems to have lapsed under Section 4A(4) of MMDR act. You are advised to submit the status of lapsing of lease and the action taken by you under rule 20 of MCR, 2016. The document cannot be processed further without ensuring the validity of the lease by the state govt regarding the termination/lapsing of the ML.
4. 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 immediately by mail.
5. 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.
6. 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.
7. 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.
8. 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.
9. 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 PMCP or sustainable mining chapters
10. On the cover page of the submitted draft document area of the mining lease is to be corrected as in the lease deed the area is mentioned 4.844 hectare and on the cover page area mentioned is 4.488 hectare it should be corrected.
11. On the cover page of the document last plan period, category of mine (A/B), type of Mine (OC/UG) and nature of use is to be mentioned.
12. 1.3.1: copy of approval letter of mentioned previously approved mining plans are to be annexed chronologically.
13. 1.3.4.4: Land acquisition details are to be filled as the mining lease is of Govt Waste land refer para 1.2.
14. 1.3.5.1: The given list of co-ordinates is not as per the mentioned annexure no 2, it should be corrected and sources of the boundary pillar co-ordinates are to be mentioned in the foot note of the table.
15. With reference to the annexure no 2, it is mentioned that 1.20-hectare area is deleted (BP No C1,C,D,D1) and lease area is 4.844 hectare, it should be discussed that which part of the area deleted and after the deletion of the 1.20 hectare how much area is left. Is this deleted area being part of 4.844 hectare? if so than details in the para 1.3.2 is to be filled i.e. clarity w.r.t lease area held at present after deletion is required.
16. 1.3.7: exact experience of the QP is to be mentioned in the para along with supporting experience certificates as per MCR 2016.



17. 2.1.1: Details mentioned in the para are to be corrected and it should be in numbers only.
18. 2.1.2: distance of all the permanent features from the mining lease is to be mentioned in the table and all the features are to be marked in the surface plan. Particulars mentioned for village, Railway station, nearest airport etc. are to be corrected in term of their distance the mining lease is situated in the J&K union territory therefore the nearest airport cannot be Jolly Grant, Dehradun. All the details are to be re-checked and corrected with the true information.
 19. The regional and local geology is to be elaborated and shall be centric in terms of mining lease geology, the RL's mentioned in the topography is different from the RL's mentioned in the local geology.
 20. Details of subsurface data are to be mentioned with the exact depth of the litho-units encountered in the mining lease from top to bottom.
 21. 2.1.4.8: in the Para structure of the deposit is to be mentioned in specific format EWE or NSN and along with its value, same for the dip, dip angle, dip direction is to be furnished.
 22. 2.2: details furnished in the para are not relevant with the said heading, details in the para are mentioned for name of the exploration agency however the details of previous exploration are given it shall be corrected.
 23. 2.2.1: The details mentioned in the form I and form J are not submitted in compliance of rule 47 and 48 of MCDR 2017. It is said that 03 nos. of DTH boreholes were drilled upto the depth of 15-meter, however annexure no. 4, shows details of 4 DTH boreholes, which are not matching with the given statement. In absence of the Form-I & Form-J the said DTH boreholes cannot be considered and as there is change in the mentioned numbers of DTH borehole. The statement shall be omitted from the document.
 24. 2.2.1.5: in the para it is said that no pitting was proposed in the last plan period, however as per the last approved mining plan there were 05 numbers of pits of 5x5x5-meter dimension were proposed, the details filled in the para 2.2.1 is to be re-checked and exact / true information is to be filled.
 25. 2.2.1.7: the details of para are to be corrected with reference to the last approved mining plan, in the last approved mining plan in the year 2016-17, 04 numbers of boreholes were proposed to be drilled with depth up to 15 meter each, however there were no Form I & Form J submitted in the regional office in support of the said exploration. Furthermore, in the current draft the details of the previously proposed boreholes have been changed and supporting documents are not matching with the said data. Incorrect and made-up information shall be omitted.
 26. 2.2.1.9 & 2.2.1.10: Details in the para is to be corrected as in one hand it is said that DTH boreholes were drilled and chemical analysis were for the sampling and on the other hand the in the said para it is said that sampling and chemical analysis are not applicable. This type of incorrect / hypothetical information shall be removed from the document.
 27. 2.2.1.13: SOP, followed to determine the bulk density of the limestone mineral of the mining lease followed shall be discussed and it should be as per the SOP of CGBP.
 28. 2.2.1.14: Area covered under different level of exploration is to be justify, as the mining lease does not have conducted any detailed exploration so far therefore, the details furnished is to be corrected based on the actual previous exploration only.
 29. The bifurcation of mining lease in different level of exploration is to be done based on the MEMC rule 2015.
 30. 2.2.2: all the furnished details in the para are to be rechecked and it should be provided based on the plan approved before last plan period, supporting document is to be annexed for the said chemical analysis and trenching.
 31. 2.2.2.12: the statement given in the para is incomplete, it is said that the limestone of the mining lease is "self-sufficient to send directly" it is not mentioned where to send the limestone in terms of use of limestone it should mentioned.
 32. 2.2.2.13: Assumption of bulk density cannot be considered as the mining plan is a techno-legal document all the information mentioned in the document shall have evidential proof.
 33. 2.2.2.14: para shall be corrected as per the point no 2.2.1.14, furthermore in the subsequent table there were no exploration mentioned in the table to convert area from one level to another, however in the remaining area in G4 level is 0.613 hectare, as the mining lease is not explored in any level then how the only 0.613 hectare remained in G4, the table is to be corrected and exact data / information is to be mentioned.
 34. 2.2.3: ore body geometry is to be marked on the Surface Geological plan and the given information shall be corrected based on the given headings. Dip of mineral body shall be mentioned in numeric as well. Average grade of the limestone of the mining lease is to be assessed scientifically. The latest chemical analysis, obtained from NABL Accredited Lab, may also be submitted.
 35. 2.2.4: Reserve and Resources estimation is to be done only as per the MEMC rule 2015, the reserve and resources of the mining lease has been drastically and dramatically increased without having any evidential

- proof of exploration. It shall be corrected as per the previous exploration done in the mining lease in accordance to the MEMC Rule 2015.
36. 2.2.4.2: sectional lines are to be rechecked with reference to the scrutiny comment no 27.
 37. 2.2.4.3: in the para it is said that reserve and resources are re-estimated and recovery of core is above 100 %, which is as vague statement, as the lease holder has claimed DTH borehole which are also without prescribed intimation to the regional office and recovery considered more than 100 %, this type of uncertain statement shall be omitted.
 38. 2.2.4.4: latest chemical analysis report of NABL accredited lab is to be annexed for the calculation of cut of grade, brief calculation for determining cut off is to be discussed.
 39. 2.2.4.7: for the cost and revenue factors, details given in feasibility report. "Feasibility Report: guidelines followed for preparation of feasibility report are mentioned MCDR 1988, for the preparation of feasibility report MEMC rule 2015 is to be followed".
 40. 2.2.4.8: in the general para nature of use of mineral is mentioned as non-captive use and in the para 2.2.4.8 it is said that the limestone is for captive used, this contradiction in the use of mineral is to be corrected and exact / true status of nature of use is to be mentioned.
 41. 2.2.4.10, 2.2.4.11, 2.2.4.12, are to be corrected based on the scrutiny comment no 27, given for reserve & resources re-estimation as per MEMC rule 2015.
 42. 2.2.4.13: the details provided in the para are to be corrected as per the format in the same table two different units are being used, units shall be used as given in the standard format. This drastic increment in reserve and resources without proper exploration cannot be considered.
 43. 2.2.5: Future exploration is to be proposed as per Rule 12(4) of MCDR 2021 and in accordance to the MEMC rule 2015, all the exploration is to be proposed in the first year itself and shall be completed within first year as the mining lease is executed in the year 2005 and till date mining lease is not covered under G1 level.
 44. 2.2.5.1: information provided in the para are to be corrected as per the para 2.2.
 45. The given 3 numbers of boreholes are not adequate as per the MEMC rule 2015 the boreholes are to be proposed in grid pattern only, isolation and linear boreholes shall be avoided, location of proposed boreholes are to be given in table form with mentioning average proposed depth, deep boreholes shall be done for the confirmation of continuity of the mineral or base.
 46. 2.2.5.7: sampling procedure shall be discussed based on the proposed exploration.
 47. Chapter 4: 4.2.1: dimension of the said pits is to be marked in the surface plan, 4.2.1.2: as the mining lease has reported production in the year 2017-18, 2018-19 & 2019-20 there may be some waste which shall store / dumped within the lease area that quantity and location of dumps are to be mentioned in the chapter and shall be marked in the surface plan. 4.2.2.2 : in the year wise development and production plan direction of development is to be given in separate sheet and the direction of the advancement shall be marked in the year wise development plan, production is to be re-calculated based on the scrutiny comments given for the reserve and resources re-estimation. In the working plan it is drawn that the excavation will starts from the top and there is no soil and OB mentioned in the chapter it should be corrected and discussed. 4.2.2.3: water requirement mentioned in the table in other table 3.9 statement given as not applicable.
 48. 4.3.4: the whole table is to be corrected and proposed production is to be reduces to the fresh re-estimated reserve and resources as per MEMC Rule 2015 and depletion of previous production.
 49. All the Paras of chapter 3 & 4 shall be corrected as per the above scrutiny comments for development, production, and machine and man-power requirement.
 50. Chapter 5: Non applicability of Vishakha committee guidelines is to be discussed? CSR initiatives for the proposal period is to be discussed, the whole chapter cannot be left blank, chapter 5 is to be filled with details as per the Rule 35 of MCDR 2021.
 51. Chapter 6: PMCP chapter is to be rechecked and all the required information's are to be filled with proper justification, there is no proposal given for the ground water recharge, no garland drains proposed, for the protective measure only 300 meter retaining wall proposed which shall be marked in the year wise development plan and same shall be reflect in the chapter 5, year wise plantation is to be proposed and same shall be marked in the development plan, survival rates of the plants are considered only 60% on one side it is said that there is no water shortage in the mining lease and surrounding and survival is very low it shall be corrected and protective measures for the plantation is to be discussed.
 52. Boundary pillar certification (Annexure -II) has not been found signed by the Authority. Clarify

Plates:

1. 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.
2. QP has not put his signature any of the plates / plans, all the plates are to be signature by the surveyor and QP.



3. If not submitted the required plates and plans as per the Rule 52 of MCR 2017, specifically location & key plan.
4. GCP points: at least three GCP should be provided in all the plates including soft copies also.
5. Latest lease plan / cadastral map is to be submitted dully authorized by the State Govt, mentioning co-ordinates of the boundary pillar.
6. Surface Plan:
 - (i) All the permanent features present in the ML are is to be marked in the surface plan, roads, nallah, electric line, village hutment all the features are to be marked.
 - (ii) Surface plan shall be; updated with a table of pits, dumps and stacks along with their dimension.
 - (iii) Type of land shall be drawn clear and identical with unique sign.
 - (iv) 7.5 barrier zone shall be marked clear and identical.
 - (v) Previously done boreholes shall be marked in the plan.
 - (vi) Index of the plans shall be updated with all the features.
 - (vii) Contour lines are to be marked in light brown dotted lines; dark thick contour lines are hiding all the other features it should be checked.
 - (viii) Old pits and boreholes done in the ML shall be marked in the surface plan.
7. Geological plan and Sections:
 - (i) Geological Sections should be in regular interval.
 - (ii) The entire feature, which are, comes across the section line shall be marked in the geological sections.
 - (iii) In the geological plan list of proposed boreholes shall be, mentioned.
 - (iv) UNFC code shall be marked in the geological plan and sections along with category level of exploration.
 - (v) Dip and strike of the deposit shall be marked in the plan.
 - (vi) Section Influence taken for reserve calculation shall be marked in the geological plan.
 - (vii) Area under different exploration category such as G1, G2 and G3 is to be marked in the hard copy geological plan.
 - (viii) UPL and UPD shall be marked in the geological plan and sections along with the UNFC code, parameters considered for geological reserves.
 - (ix) Blocked reserve and resources due to the permanent features passing through and from near to the ML shall be marked in the geological plan and UNFC code of the same shall be mentioned.
8. Local grid shall be omitted from all the plates, UTM grid is to be marked in all the plates.
9. In view of deficiencies and misinformation found in the surface and geological plan and subsequent text, the same deficiencies/misinformation is being attributed to all other plates. Thus other than these deficiencies, if any found in other plans, shall be corrected accordingly.
10. As per the CCOM Circular 1/2021 and FAQ issues thereafter, maps are to be submitted in the soft format (.kml, .kmz, .dwg & .shp) along with the hard bound copies and specifications of maps are already been mentions in the circular.
11. All the plates are to be submitted in soft format (.kml, .kmz, .dwg and or .shp) and it should be geo-referenced using the datum WGS 84 UTM Zone only.
12. All the Land use pattern such as lease area, pits, dumps, stacks, plantation area, any other structures shall be prepared in polygon geometry.
13. In this case the submitted soft copies of plans are in .pdf format and few are in .kmz file format however the features are prepared using line geometry it should be corrected to polygon geometry.
14. Pit area is to be drawn and written in the surface plan and surface geological plan and in the other soft file (.shp, .kml, .kmz & .dgg).
15. Year wise working plans are to be submitted using polygon feature in soft file (.shp, .kml, .kmz & .dgg).
16. There is difference in between the DGPS survey boundary plans and marked boundary pillars, lease area has geometry of line instead of polygon.
17. All the digitization should be done in Geographical Co-ordinate System (GCS) WGS-1984 datum.
18. The Shape file should contain the Land use information as attribute data.
19. The file name should be arranged as "Mine name_Ownername_Area_Landuse type".

Example:

1	For Lease boundary file name	ABC XYZ Hect Leaseboundary.kml/.kmz/.shp/.dwg
2	For pit file name	ABC XYZ Hect pit.kml/.kmz/.shp/.dwg
3	For dump file name	ABC XYZ Hect dump.kml/.kmz/.shp/.dwg
4	For others: Road, infra etc., file name	ABC XYZ Hect others.kml/.kmz/.shp/.dwg

5	For Reclaimed and Rehabilitated Land	ABC XYZ Hect Rec Rehab.kml/kmz/.shp/.dwg
6	Any other Permanent Feature	ABC XYZ Hect FeatureName.kml/.kmz/.shp/.dwg

Annexures:

1. NABL certification, Validity and scope of work of the lab is to be annexed.
2. In annexure 6, copy of old approved mining which have no relevance to the present plan period therefore it should be omitted.
3. Annexure 7 is to be prepared as per the MEMC rule 2015 and scrutiny comments given above.
4. As the lease holder is M/s Bawan Minerals is proprietor firm, firm registration certificate, GST certificate of the firm is to be annexed.
5. 1.3.6: self-attached Photo ID proof and address proof of the nominated owner is to be annexed.
6. Bank guarantee for financial assurance is to be submitted with the document in the model form prescribed for the purpose.

