



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

Email/Post



फाइल संख्या File No: 614(2)/MS-B-216/12-DDN

सेवा में/ To : श्री पंकाज पाण्डे,  
मैसर्स सहज सहयोग कंसल्टेंट प्राइवेट लिमिटेड,  
अलीगंज, लखनऊ – यू।पी

देहरादून, दिनांक 08/06/2022  
e-mail: sahasahyog990@gmail.com

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 (Bharwana Limestone Mine) over an area of 2.9 ha in Village-Bharwana, Tehsil- Renukaji, 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 04-05-2022 received by this office on 05-05-2022.

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 05.05.2022. The mine has been inspected by Shri Damodar Prasad Sharma, ACOM and 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 State DMG for its 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/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,

(दीपक शर्मा /Deepak Sharma)

वरिष्ठ खनन भूविज्ञानी /Senior Mining Geologist

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर। (zo.udaipur@ibm.gov.in)
- 2- श्री राजेन्द्र सिंह मैसर्स भरवाना चूनापत्थर खान, गांव-रनफुआ, पोओ-अंधेरी, तहसील-सांग्रह, जिला-सिरमौर, हि.प्र. 173001 (shersinghpaonta@gmail.com, gauravnegi14@gmail.com)

वरिष्ठ खनन भूविज्ञानी /Senior Mining Geologist

**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 Bharwana Limestone Mine, Mining lease over 2.90 an area of hectares located near Village-Bharwana Tehsil-Renukaji, District-Sirmour of HP submitted by Shri Rajendra Singh Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2022-23 to 2026-27.**

**Cover Page:**

- 1) Cover page is not found (deemed necessary)

**Chaper-1, General information:**

- 2) Para 1.1 Lease area should also be given bigha. The conversion table for the said area of Himachal Pradesh be enclosed as well.
- 3) Para 1.1 Mine code to be mentioned in lease details.
- 4) Para 1.1.1 Lease details shall be given as per lease deed. Original lease deed not found enclosed as annexure.
- 5) Para 1.3.5.1 the boundary pillar Co-ordinates given in last approved documents are not matching with present submission. Hence the proper reason for change in coordinates be given and certification by State Government to this effect be submitted.
- 6) The boundary pillar coordinates authenticated by competent authority of State Government be enclosed.
- 7) Para 1.3.4.1 Environment Clearance (EC) validly is up to 29.05.2023 but proposals in this document are given up to plan period 2026-27. The status of extension of EC be recorded.
- 8) Para 1.3.6 ID and address proof of lessee not found attached with document.

**Chapter-2, Geology and Exploration:**

- 9) Without any exploration done in the plan period, the reserves and resources classification and assessment has changed. As per rule 12(4) the lessee was suppose to carry out the detailed exploration (G1 level) over the entire potentially mineralized area under the mining lease, however it has not been done. Thus the reserve and resource classification and assessment needs clarification and/or correction.
- 10) The quantity of the reserves and resource have not been assessed properly, few channel samples from the face may be drawn which can be considered akin to bore hole samples to assess the quality.
- 11) The quality of all the three litho units of limestone be assessed and submitted.
- 12) Para 2.2.2 It is mentioned that three exploration pits was carried out during before last plan period but details of such pits are not given in Para 2.2.2.5.
- 13) Para, 2.2.1.10, Chemical analysis of core /non-core samples may be uploaded in CSV file which shall normally include five files namely collar file, survey file and Geology log file, Assay file and RQD File.
- 14) In Para 2.2.4.3, assumptions for reserves and resources assessment be recorded considering provisions of MEMC Rules, Topography.

**Chapter-4, Mining:**

- 15) Para 4.2.1.1, Pit dimensions are found arbitrary and not delineated in surface plan as per given dimensions.
- 16) Para 4.2.1.2 as per this para both dumps D1 and D2 are active but in Para 4.2.1.3 it is mentioned that both dump are stabilized, which is contradictory. Further the adequate protective structures to prevent the flow of material into the downside be taken. The check dam, check wall, toe bunds be proposed.
- 17) Para4.4.3 Dumper/tippers requirement calculation is not correct with respect to proposed production capacity.
- 18) Para 4.2.2 Benches wise mRL to be given in the table.
- 19) Para 4.2.2.2 Location of bench advancement be shown on year-wise production plan. It's location be given with co-ordinate (latitude and longitude). And waste to ore ratio cannot be nil, it should be mentioned in ratio format (1:00).
- 20) Para 4.2.2.2 without any scientific study Limestone recovery proposed 100%, which needs to be review.
- 21) The bench height and width proposed are not fit for systematic development of mines with jack-hammer drilling, mechanized loading and transportation as per MMR. Hence the mining proposed need to be revised.
- 22) Para 4.2.2.1, Latest Ambient air quality report , Water quality report and Noise Monitoring report were not found enclosed.
- 23) .Para 4.3.1 Bulk Density Study be undertaken in the field and report thereof be enclosed.
- 24) The pit road layout be given for the proposed working.
- 25) The submission "As benches proposed in hilly terrain from top to down so working bench width is not needed as benches goes down following the hill slope. Width between two benches has kept for ultimate benching nearly 5m wide maintaining ultimate pit angle of 45°" is not acceptable.

*For Ammb*

### **Chapter-5, Sustainable Mining:**

- 26) Proposals be given for community services. Further the proposals should be there for all the years and lessee must strive to spend 10% of royalty towards these activities.

### **Chapter-6, PMCP:**

- 27) Para 6.1, in status of land, it is mentioned that waste dump stabilized (area 0.102 ha) but as per field visit no such stabilized dump is evident in the mine.
- 28) Para 6.1 area under mining operation is given 0.737 ha but as per previous approved plan area under mining was already given 1.40 ha, pit area mismatched. Para 6.2.2.2.1 & 2 & 3, being a steep hilly mining area, adequate fencing, retaining wall and sufficient garland drain along haul road shall be proposed
- 29) In Para 6.2.1.1, the boreholes have been proposed for ground water recharge. The study be proposed before undertaking these boreholes, check-dams may be proposed to increase the water retention period on the suitable sites and thus increasing the recharge activities.
- 30) Para 6.2.3.2, Year wise plantation proposals are not adequate and 30% of lease area has to be put to plantation at the conceptual stage. So, proposals be given accordingly.
- 31) Para 6.2.11, it cannot be nil proposals under total mined out area for reclamation and rehabilitation. 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.
- 32) Para 6.2.11 Total land use area is not matching with lease area, details to be checked.
- 33) The retaining wall proposal be given considering the contour levels in mind and check-dam proposal be given.
- 34) The proposal be given for monitoring of ground water.

### **Chapter-7, Financial Assurance:**

- 35) The land put to use under different heads be circumscribed and measured for calculation of correct value of financial assurance.
- 36) Total put to use area in the proposed plan period is 1.378 ha is less than as compared to previous approved plan. Review put to use area during plan period. Total put to use area less than previous approved plan is not considered so put to use area be given accordingly.
- 37) Area put to use for mining and allied activities in view of above comments and accordingly the amount shall be submitted in the form of BG as per Rule 27 of MCDR Amendment Rules, 2021.

### **Chapter-8, Review of previous proposals:**

- 38) Para 8.2.1 exploration of 5 boreholes was proposed during the last plan period but no exploration was carried out. Reason for deviation not recorded.
- 39) Para 8.2.2.1 Year wise production to be provided in this table instead of Cumulative production details.

### **Miscellaneous:**

- 40) 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.
- 41) In congruous submissions have been observed in various parts of the document; ensure the congruity in submissions accordingly.
- 42) All the proposals should be made within Mining lease only. Any photographs of ML, PMCP activities shall be submitted.

### **Plates:**

- 43) Lease Cadastral plan and Geo referenced Cadastral plan in .kml file are not found.
- 44) **Plate No.3, in Surface Plan,**
- 45) It looks as if field survey has not been done correctly. The workings have not been plotted correctly and do not show the correct bench orientation of the area. Instead of side cuttings it is shown as pit. Hence field survey be done to show the correct position of benches.
- 46) All existing surface features like, existing land details, existing plantation, color coding shall be separated by each surface feature shall be demarcated.
- 47) Three Ground Controls points are not marked in the plan. Three ground controls points shall be shown in the plan and .kml also.
- 48) **Plate No.4, Surface Geological Plan:**
- Area under different level of exploration G1, G2 axis not shown in the plan.
  - Coordinates of proposed bore holes and depth are not given.

- 49) Plate No. 5 Section 1-1' is not matching with Surface Geological plan with respect to no's benches, road and other surface features. At Section 4-4' Dump marked on SGP but not shown in SGP section. Others sections also are not matching with SGP with respect to surface features.
- 50) Plate Numbers up to 6-10, Year-wise development plans:
- Yearly wise proposals shall be marked different colour coding in the all development plans.
  - Before proposals are depicted, correction of existing benches in scientific manner may be proposed.
  - Year-wise plantation, parapet wall and retaining walls shall be shown in plan.
- Plate No 11, Conceptual Plan:**
- 51) Conceptual Plan is not correct; access route from surface ground level upto the pit bottom is not given. Haul road is also not shown from top level to bottom level.
- 52) Vertical benches shown in the conceptual section which is not correct. Separate conceptual section may be given.
- 53) **Plate No. 13 : Progressive Mine Closure plan**
- Reclamation proposals be changed as per progressive Mine Closure plan.
  - Prominent Wind direction is not shown in plan.
  - Waste dump height and retaining wall along the dump is not marked.
  - All the closure activities like check dams, safety berm along haul road shall be covered as shown in plan.
- 54) **Plate No.14, Environment Plan:**
- Proposed plantation should be marked on Plan.
  - Nearby mining leases are not shown in the Environment plan.
  - Environment Plan is not as per Rule 32(5)(b) of MCDR 2017, important features i.e. outside mining lease area especially just adjacent to ML area are not shown.
- 55) **Plate No.15 Financial Assurance Plan**, Existing broken area and additional area required during plan separately marked on plan as per financial assurance table given in text.

**General:**

- 56) 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 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. However you have not submitted the same till date. It should be submitted within 2 days so that the data submitted by you could be processed at Head Quarter.
- 57) 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.
- 58) All the annexure should be attested by qualified person for their authenticity.
- 59) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 60) 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.
- 61) 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.
- 62) Authentic geo-reference cadastral lease plan shall be the only basis for the preparation of all the plans and sections. There should not be any deviations in all the plans (either in .kml file or .pdf file or hardcopy) and sections with respect to configuration given in the lease plan.

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*for  
Shamsh*