



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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Email/Post



फाईल संख्या File No: 614(2)/MS-B-65/98-DDN

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

देहरादून, दिनांक 20-06-2022
e-mail: sahajshahyog990@gmail.com

विषय/Sub : एमसीडीआर 2017 के नियम 17 (2) तथा खनिज (परमाणु और हाइड्रो कार्बन ऊर्जा खनिजों के अलावा) रियायत नियम, 2016 तहत प्रस्तुत खनन योजना तथा पीएमसीपी के साथ सहायक दस्तावेजों की समीक्षा में अपूर्ण विवरण / सूचना / विसंगतियों / कमियों आदि का संकेत देते हुए जांच टिप्पणियां के हिमाचल प्रदेश की जिला- सिरमौर, तहसील कामरू, गांव - भीमगोडा में 3.05 हेक्टेयर के क्षेत्र में खनन पट्टा क्षेत्र (भीमगोडा चूना पत्थर खदान)
संदर्भ/Ref. : इस कार्यालय को दिनांक 24-05-2022 को प्राप्त खनन पट्टा धारक का पत्र संख्या शून्य दिनांक 06-05-2022 के तहत 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 24.05.2022. The mine has been inspected by undersigned 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**.

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.

संलग्नक: ऊपर के रूप में।

भवदीय,

20/06/2022
20-06-2022
(दामोदर प्रसाद शर्मा)
सहायक खान नियंत्रक

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुरा (zo.udaipur@ibm.gov.in)
- 2- श्री चूही राम शर्मा, खननपट्टाधारक- भीमगोडा चूनापत्थर खान, गांव व पोस्ट-कमरू, तहसील-पांवटा साहिब, जिला-सिरमौर हि.प्र. (mcshimachal@gmail.com)

सहायक खान नियंत्रक

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 Bhimgoda Limestone Mine, Mining lease over 3.05 ha an area of hectares located near Village-Bhimgoda Tehsil-Paonta Sahib District-Sirmour of HP submitted by Shri Chuhi Ram Sharma Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2022-23 to 2026-27.

Chaper-1, General information:

- 1) Para 1.1 Lease area should also be given bigha along with conversion table for the same is enclosed as annexure.
- 2) Para 1.3 Date of execution of Mining lease is not matching with lease deed. Date of execution shall be given as per lease deed.
- 3) 1.3.1: copy of approval letter of mentioned previously approved mining plans are to be annexed chronologically.
- 4) 1.3.7: exact experience of the QP is to be mentioned in the para along with supporting experience certificates as per MCR 2016.
- 5) Para 1.3.5.1 Lease Co-ordinates are not matching with the co-ordinates mentioned in previously approved Modified Mining Plan. If any change in co-ordinates shall be approved by the State Govt.
- 6) Lease boundary pillars co-ordinate authenticated by competent authority State Govt shall be enclosed.
- 7) Lease boundary pillars co-ordinates submitted in the text part are not matching with configuration of KML of all plates.
- 8) Para 1.3.4.1 Environment clearance validity is up to 10.05.2024 but proposal given up to plan period 2026-27. EC granted for 45000 tonnes limestone production but proposal given more than EC limit which needs to be review.
- 9) Para 1.3.6 Photo ID and address proof of lessee not found attached with document.

Chapter-2, Geology and Exploration:

- 10 The regional and local geology is to be elaborated and shall be centric in terms of mining lease geology.
- 11 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.
- 12 2.2.1 Name of exploration agency is incorrect.
- 13 Para 2.2.1.7 The boreholes drilled could not be verified /substantiated during field inspection. The lessee also has never submitted Form I or Form J. Hence the exploration needs to be corrected accordingly.
- 14 Re-estimate reserve and resources as per MEMC rule 2015.
- 15 2.2.1.9 & 2.2.1.10: Incongruity with respect to exploration and analysis be corrected.
- 16 Para 2.2.2.13 Bulk density needs to be assessed on the basis of field test. Bulk density study report shall be enclosed.
- 17 Para 2.2.2.14 Total area of exploration not covered under G-1 axis, the holder of a mining lease shall carry out detailed exploration (G1 level) over the entire potentially mineralized area under the mining lease within a period of 5 years from the date of commencement of the rules as per Rule 12(4) of MCDR-2017. Sufficient proposal shall be given to bring the total area under G-1 axis.

रामेश

Chapter-4, Mining:

- 18 Para 4.2.2.1 Data regarding No. of benches in year wise production and development plan are not corroborating with text. Details of benches parameters shall be given as per format.
- 19 As per method of working six meter height benches proposed but drill machine proposed jack hammer which not synchronize with benches height. Method of mining in sub benches may be proposed.
- 20 Para 4.2.2 Benches wise mRI to be given in the table.
- 21 Para 4.2.2.2 Location of advancement to be given with co-ordinate (latitude and longitude) on yearly wise. And waste to ore ratio cannot be nil, it should be mentioned in ratio format.(1:00).
- 22 Para 4.2.2.2 without any scientific study Limestone recovery proposed 100%, which needs to be review.
- 23 Para 4.4.4 Rate of drilling is given 30 meter /hour for jack hammer which is not correct. Needs to be review it.
- 24 Being hilly terrain more benches width to be proposed.
- 25 Para 4.2.2.1, Latest Ambient air quality, Water quality and Noise Monitoring reports not found enclosed.

Chapter-5, Sustainable Mining:

- 26 Para 5.2, whatever proposals are proposed in the year wise column cumulative data be given as well, it shall be reflected in cumulative column which is not found. Review cumulative heads

Chapter-6, PMCP:

- 27 Para 6.2.3.2, Year wise plantation proposals are not adequate and adequate plantation proposals to be given.
- 28 Being steep hilly terrain mining area adequate proposals of fencing, retaining wall and sufficient garland along haul road may be proposed.
- 29 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.

Chapter-7, Financial Assurance:

- 30 It is mentioned no fresh area shall be broken during plan period but as per financial assurance table additional area required during plan ,which is contradictory.
- 31 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:

- 32 Para 8.2.2.1 Yearly wise production not achieved as per proposals, reasons for deviation may be given.

Miscellaneous:

- 33 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.
- 34 In congruous submissions have been observed in various parts of the document; ensure the congruity in submissions accordingly.
- 35 All the proposals should be made within Mining lease only. Any photographs of ML, PMCP activities shall be submitted.

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Plates:

- 36 Lease Cadastral plan and Geo referenced Cadastral plan in .kml file are not found.
- Plate No.3, in Surface Plan,**
- 37 All existing surface features like, existing land details, existing plantation, color coding shall be separated by each surface feature shall be demarcated.
- 38 Three Ground Controls points are not marked in the plan. Three ground controls points shall be shown in the plan.
- 39 7.5 barrier zones shall be marked clear and identical.
- 40 Previously done boreholes shall be marked in the plan.
- 41 Plate No.4, Surface Geological Plan:**
- a. Area under different level of exploration G1, G2 axis not shown in the plan.
- b. Ultimate pit limit shall be marked on geological plan.
- c. UNFC Code shall be marked on surface geological plan.
- 42 Plate No. 5 Section 1-1' and Section 5-5' are not matching with Surface Geological plan with respect to surface features and counters of the plan.
- 43 Plate Numbers up to 6-10, Year-wise development plans:
- a) Year-wise plantation, parapet wall and retaining walls shall be shown in plan.
- 44 **Plate No 11, Conceptual Plan-** Conceptual Plan is not correct; access route from surface ground level upto the pit bottom is not given. Haul road also shown in conceptual from top level to bottom level
- 45 Plate No.11 A conceptual section are not matching with conceptual plan in respect of no of benches and surface features.
- 46 **Plate No. 13 : Progressive Mine Closure plan**
- a) Prominent Wind direction is not shown in plan.
- b) Waste dump height no marked on plan.
- e) All the closure activities like check dams, retaining walls , fencing and safety berm along haul road shall be shown on plan.
- 47 **Plate No.14, Environment Plan:**
- a) Proposed plantation and existing plantation not shown on plan.
- b) 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.
- 48 **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:**
- 49 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.
- 50 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.
- 51 All the annexure should be attested by qualified person for their authenticity.
- 52 Additional comments shall also be communicated to you in case of receipt of comments from State government if any.

- 53 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.
- 54 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.
- 55 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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