

**Speed Post /FAX**

No/ संख्या-614(2)/MP-B-232/06-DDN

100- Old Nehru Colony, Dehradun (UK)  
100-ओल्ड नेहरू कालोनी देहरादून (उत्तराखण्ड),  
Dated/ दिनांक 03.04.2017

To/सेवा में: M/s Illahi Cement Industries  
Malik Riaz Ahmad Shah  
R/O-Industrial Area  
ANCHIDORA (Azadpora)  
Tehsil & District- Anantnag - 19 2 101  
(J&K)

Sub/विषय: Submission of Review & Updation of Mining Plan with Progressive Mine  
Closure Plan of Check Issar Dass Limestone Mine situated in Village - Check  
Issar Dass, District- Anantnag, State J & K of M/s Illahi Cement Industries  
measuring over an area of 115.0 ha.

Ref./ संदर्भ: Your letter No- Nil dated Nil received in this office on 23.03.2017

Sir/महोदय,

We have received two copies of the above-mentioned draft Review & Updation of  
Mining Plan with Progressive Mine Closure Plan on 23.03.2017. On examination of the same the  
discrepancies/deficiencies observed have been listed in annexure.

You are requested to modify the draft Review & Updation of Mining Plan with  
Progressive Mine Closure Plan as per enclosed annexure and submit the 3 fair copies of the Review &  
Updation of Mining Plan with Progressive Mine Closure Plan within 15 days from the date of issue of  
this letter after corrections. If the fair copies of Review & Updation of Mining Plan with Progressive  
Mine Closure Plan will not be submitted within stipulated time, final action will be taken as per rule. A  
soft copy of the fair Review & Updation of Mining Plan with Progressive Mine Closure Plan may also be  
submitted including text and plates. Draft copy of mining plan may also be returned along with fair copies.  
This scrutiny letter is being issued with the approval of competent authority.

Encl: as above.

Yours faithfully, भवदीय,

(S. Saklani)

सहायक खनन भूवैज्ञानिक / AMG,  
कृते क्षेत्रीय खान नियंत्रक एवं प्रभारी अधिकारी / for RCOM & OIC  
भारतीय खान ब्यूरो / IBM

प्रतिलिपि सूचनार्थ-

- 1- खान नियंत्रक (उ०), भारतीय खान ब्यूरो, उदयपुर।
2. श्री पंकज पाण्डे, भूवैज्ञानिक, बी-1/21 सेक्टर- बी अलीगंज लखनऊ-226 024 इस पत्र के साथ ड्राफ्ट Review  
& Updation of Mining Plan with PMCP की एक प्रति भी संलग्न की जा रही है। (स्पीड पोस्ट)

पत्र प्रेषित किया  
दि० ३१/०४/१७

सहायक खनन भूवैज्ञानिक / AMG,  
कृते क्षेत्रीय खान नियंत्रक एवं प्रभारी अधिकारी / for RCOM & OIC  
भारतीय खान ब्यूरो / IBM

**Scrutiny comments in respect of Review and updation of Mining Plan with PMCP of Check Issar Dass limestone mine of M/s Illahi Cement Industries(115.0 hect.) in Anantnag district of J&K State submitted under Rule 17(1) of MCR 2016 & 23B(2) of MCDR 1988.**

1. Authentic lease plan with all the Khasra details of the villages duly verified by Geology & Mining department of State Govt showing the location of the lease area with DGPS coordinates of boundary pillars should be enclosed in which original lease area, area surrendered and retained area are to be marked precisely. Authentic lease plan shall be the basis for the preparation of all the plans and sections. There should not be any deviations in all the plans and sections with respect to configuration given in the lease plan.
2. Khasra plan is not enclosed.
3. Representative photographs are not enclosed.
4. Certificate is not signed by the qualified person.
5. On cover rule of PMCP should be submitted under rule 23 of MCDR 2017.
6. On cover page mine code is not indicated.
7. GPS coordinates mentioned on corners of lease boundary in the plates are not matching with the table no. 1 of the text.
8. The exploration shall be carried out as per rule 12 of MCDR 2017.
9. On page 14 under expenditure, 08 pits are indicated. It is not understood what these pits are. Whether trial pits have been dug. In case the trial pits have been dug, the location of the same should have been marked on the relevant plates. The expenditure is also not justified.
10. On page 15 it is mentioned that prospecting report has been prepared as per MCR 1960. Whereas the same has been repealed.
11. On page 17 it is mentioned that depth of pit reaches 1832mRL but the same is not matching with the relevant section.
12. On similar page, basis of estimation of reserves have been discussed. How proved reserves (111) and probable reserves have been estimated without quantifying 331 measured mineral resources (G1) and 332 indicated mineral resources (G2). It needs clarification.
13. There is no mention of depletion of reserves.
14. Insitu and recoverable reserves are required to be rechecked thoroughly.
15. Year wise production proposals are indicated on page 22 to 24. It is observed that workings are confined to road level, pit-I and pit-II. Whereas workings are shown on pit-4 in the year wise development plates. This is contradictory. Nomenclature of the pits needs to be revised. Bench wise RLs are also not matching with the year wise development plates. This needs to be thoroughly rechecked.
16. Nomenclature of all the pits needs to be revised accordingly.
17. Year wise, pit wise production may be revised accordingly.
18. Dimension of the pits are not matching as per dimension of the pits mentioned in the text.

19. During the next ensuing five years approximately 9 lakhs tonnes of limestone production is proposed which is on higher side. Suitable year wise production schedule is to be given.
20. On page 26, exploratory pits and DTH are indicated for the first and second year. Only few pits are indicated in the relevant plates. Local coordinates are also not matching.
21. On page 30 it is mentioned that depth of water table in the surrounding area is about 1742mRL whereas on the same page it is mentioned that proposed depth of pit shall reach upto 1946mRL and water table will not be intersected. It is contradictory. It needs clarification.
22. On page 27 it is mentioned that no soil and waste shall be generated whereas on page 31 the quantity of interburden is indicated year wise. It needs clarification.
23. PMCP shall be submitted as per rule 23 of MCDR 2017.
24. On page 35 under PMCP, area covered under plantation is shown as nil in the table. How it is possible. During the planned period, plantation is proposed. The same should be explained.
25. Similarly on page 37 area occupied at the end of conceptual period is indicated as 109.81 hectares which appears to be on higher side. Break up of the area needs to be given.
26. Blasting parameters and pattern have not been dealt adequately.
27. Latest chemical analysis report are not carried out from NABL
28. Yearwise proposals for rehabilitation and reclamation should be given in tabular form.
29. Proposed plantation for ensuing five years are not adequate considering the large area. KML file of lease area should be submitted alongwith fair copies.
30. Violations pointed out by IBM and compliance thereof has not been given.
31. Original signature of lessee with date on consent letter/undertaking/certificate are not given.
32. The mine is located on hill slope. Hence adequate proposals should be incorporated like controlled blasting techniques, erecting retaining walls, check dams, parapet walls to ensure safe and systematic mining for ensuing five years.
33. It is mentioned on page 44 of PMCP that net area considered for calculation is 7.10 hectares. According to rule 27 of MCDR 2017, financial assurance shall be furnished by the holder of mining lease, for due and proper implementation of PMCP, which shall be an amount of 3 lakhs for A category mine per hectare of the mining lease area put to use for mining and allied activities. Provided that the minimum amount of financial assurance to be furnished shall be 10 lakhs for A category mines. Accordingly financial assurance shall be calculated as under:  
Area to be considered for calculation- 7.10 hectares  
Financial assurance @ 3 lakhs per hectare=  $7.10 \times 3 \text{ lakh} = 21.30 \text{ lakhs}$ . In case there is any change in the area put under under mining and allied activities, the calculation shall be done accordingly i.e. 3 lakhs per hectare.

34. The validity of earlier bank guarantee ( 2 lakhs) is extended upto 05.12.2022 whereas proposals are given upto 2021-22. The validity of bank guarantee shall be extended upto 31.03.2022. Further an amount equal to the difference between the financial assurance due and the financial assurance already furnished shall be submitted along with final submission of mining plan.
35. Proposed production as on higher side. In view of this, operating cost and economic viability shall be recalculated.
36. There are several typographical mistakes which require to be corrected.
37. All the annexures should be attested by qualified persons for their authenticity.
38. Corrections marked on the text may also be attended.
39. Corrections marked in the text and plates by ball point may also be attended.
40. A CD / pen drive covering the entire document and plans should be enclosed at the time of final submission. Undertaking in this regard by the qualified person should be given that the CD contains the same text & plates as submitted in hard copy.

#### **Plates**

41. Plans and sections are not drawn in a single plate. They are drawn by clubbing two pages.
42. Authentic lease plan with all the Khasra details of the villages duly verified by Geology & Mining department of State Govt showing the location of the lease area with DGPS coordinates of boundary pillars should be enclosed in which original lease area, area surrendered and retained area are to be marked precisely. Authentic lease plan shall be the basis for the preparation of all the plans and sections. There should not be any deviations in all the plans and sections with respect to configuration given in the lease plan.
43. Pits wherein yearwise excavation is shown are not matching with the pits indicated in the text.
44. Coordinates marked on the plates are not matching with the coordinates mentioned in the text.
45. In case nomenclature of the pits is wrongly quoted, then all the yearwise production plates need to be revised.
46. As suggested the production is on higher side. Accordingly relevant plates are to be modified.
47. Pits dimension is not matching with the dimension shown in the plates. This need to be corrected.

Please note that all the corrections may be attended carefully before submitting three fair copies.