



भारत सरकार / Govt of India
खान मंत्रालय / Ministry of Mines
भारतीय खान ब्यूरो / Indian Bureau of Mines
हैदराबाद क्षेत्रीय कार्यालय / Hyderabad Regional Office

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F. No. AP/gnr/MP/LST-73/HYD

Room No.603, CGO Towers,
6th Floor, Kavadiguda,

Secunderabad-500 080.

Date: 24 .06.2020

To

Shri L.Muthukrishnan,
Director & Nominated Owner,
Chettinad Cement Corporation Pvt. Ltd.,
Chettinad Towers, 603, Anna Salai,
Chennai-600006.

Sub: Submission of Modification of Mining Plan & PMCP in respect of Pedagarlapadu Limestone Mine of M/s Chettinad Cement Corporation Ltd., over an extent of 377.68 Hects. In Pedagarlapadu and Kesanupalli villages, Dachepalli Mandal, Guntur Dist. of Andhra Pradesh State submitted under Rule 17(3) of MCR, 2016.

Ref: Your letter no. Nil dated 06.05.2020.

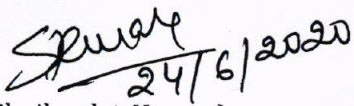
Sir,

With reference to your letter cited above on the subject, the draft Modification of Mining Plan has been examined by Sri S.K.Muduli, JMG. Due to covid-19 lockdown inspection couldn't being carried out and the table scrutiny comments have been prepared as given in Annexure. The same scrutiny comments have been forwarded to you and your Qualified Person on e.mail id i.e muthukrishnan.l@chettinadcement.com, chtdmds@vsnl.com and empres05@rediffmail.com

02. You are advised to attend these deficiencies as per the annexure and resubmit the document, complete in all respects, in three bound copies along with soft copy in the form of CD (2Nos.). In this regard you are directed to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities @ Rs.Three lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs.Ten lakhs as per the provision of Rule 27(1) of MCDR, 2017 at the time of submission of final copies of the document within 15 (fifteen) days from the date of issue of this letter, failing which the document will be disposed without giving any further opportunity.

03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

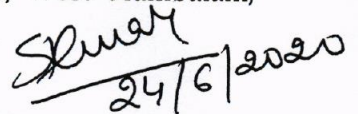
Yours faithfully,


24/6/2020
(Shailendra Kumar)

Regional Controller of Mines

Copy to:

Shri K.Shankar, Qualified Person, New No.49, Old No.23 Umapathy Street, West Mambalam,
Chennai-600033.


24/6/2020
(Shailendra Kumar)

Regional Controller of Mines

मूल पति पर नही

खान नियंत्रक (द), भारतीय खान ब्यूरो, बंगलुरु।

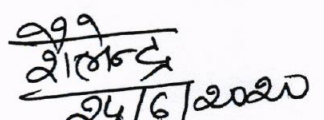

24/6/2020
(शैलेन्द्र कुमार)
क्षेत्रीय खान नियंत्रक

Table Scrutiny comments on the Modification of the Approved Mining Plan and PMCP in respect of Pedagarlapadu Limestone Mine of M/s. Chettinad Cement Corporation Ltd. over an extent of 377.68 hec. in Pedagarlapadu and Kesanupalli villages, Dachehalli Mandal, Guntur district of Andhra Pradesh.

Cover Page-

- 1) In the covering page, Forest, Non forest area and type of land and extent needs to be annexed.
- 2) In the cover page the head needs to be mentioned as Modification of Mining Plan and instead of Mining Plan period and Modification of the Approved Mining Plan period it may be mentioned as plan period and proposal period.
- 3) Rule position under which the Modification of approved Mining Plan along with PMCP needs to be mentioned correctly.

General-

- 4) The Modification of Mining Plan should be prepared as per IBM Manual on appraisal of Mining Plan-2014.
- 5) Soft copy of the draft and final documents need to be submitted.
- 6) Para 3.5 (Reason for Modification)-
 - a) Lessee has entered in Mine Development and Production Agreement (MDPA) with State Govt on 28th March 2020, which is linked with approved production of 5 million Tonnes of Limestone proposed for 2020-2021. In view of proposed reduction in clinker plant capacity a revised MDPA for Limestone production consumerate with plant requirement to be submitted accordingly.
 - b) It has been noted that you have cited pending exploration as a reason for modification, too cannot be accepted . It is noted that the violation is pending since 2019-20. In the current year 2020-21, it has to be completed but you have not given any action taken for compliance of it.. The status of compliance of violation is required to be recorded in relevant para.
 - c) Only from design point of view regarding bench height (approved by DGMS) the modification can be done. Earlier approved information pertaining to topography, exploration already completed and survey should not be modified.
- 7) The Time schedule of commissioning of the Clinker plant needs to be submitted. Year wise achievement of rated capacity of the clinker plant to evaluate the year wise requirement of Limestone needs to be submitted.
- 8) The latitude and longitude of the boundary pillars should be as per the lease sketch. Shape and Size of the precise mining lease area as in the plans must match with the shape and size of the mining lease area as per the lease sketch.

The DGPS survey reports/letter along with the authenticated lease sketch needs to be submitted.

- 9) Recent list of Members of Board of Directors needs to be annexed.
- 10) Name of nominated owner, address, email id, mobile no should be as per registration under rule 45. Name of the nominated owner in page 5 needs to be submitted as per Board of Director's resolution annexed.
- 11) The consent letter of Nominated Owner for preparation and submission of modification of mining plan needs to be annexed.
- 12) Status of Name change acceptance needs to be submitted at introduction.
- 13) Annexure submitted in respect of Consent to Operate is not relevant and is in respect of Application made for CTO. Correct annexure needs to be submitted wrt CTO; else the submission "Consent to Operate was obtained" needs to be deleted.
- 14) Repetition needs to be avoided instead references needs to be given.
- 15) Permission to reduce the Plan scale needs to be annexed.

Review-

- 16) Year wise review needs to be submitted for reclamation and exploration.
- 17) Submit review of excavations (Limestone, Top soil) for the year 2020-21 upto the date of survey.

Geology-

- 18) Under Chapter 1(c) of Part-A, average grade of different type of Limestone occurring within the mining lease needs to be submitted in the text.
- 19) Under Chapter 1(e) of Part-A,
 - a) Summarized bore hole lithologs signed by the Geologist in respect of each bore hole needs to be submitted for different type of Limestone occurrence with average grade. Average grade of the entire deposit based on available exploratory data to be submitted.
 - b) The location co-ordinates in respect of all the 48 nos of bore holes drilled in 2018-19 needs to be submitted in UTM (Easting, Northing), diameter, and inclination also.
 - c) Data furnished of the exploratory drill holes drilled during the Prospecting Licence is not corroborated by Geological Plan & Sections.
 - d) In congruency submission has been found in the exploratory drill holes Nos that were drilled during the Prospecting Licence period from Bore hole lithologs, Surface Geological Plan, Geological Cross section and also in text.

- e) Copy of Laboratory analysis reports needs to be annexed towards chemical analysis of bore hole samples.
- f) At least for 10% of total samples needs to be analyzed in accordance to from NABL accredited Laboratory and copies thereof need to be annexed.

20) Under chapter 1.0 (f)(g),(h) of Part A,

- a) Base plan considered for preparation of geological plan, needs to be mentioned.
- b) It has been observed that surface topography have been changed in all the plans and sections wrt the approved Mining Plan. The surface topography be maintained as per the approved mining plan.
- c) Further, Geological Plan is changed w.r.t earlier approved Mining Plan especially the Bore Hole collar RL and Location of Bore holes. Reason needs to be justified with proper documentation.
- d) Block wise area explored under different level of exploration and UPL needs to be demarcated in the Geological plan. Safety zone needs to be demarcated as per statute from Mines Office, Rest Shelter, ANFO Mixing Shed, Magazine and Village.
- e) UPL needs to be marked in the Geological Cross section and Plan. Area which is not granted needs to be mentioned in the Geological Cross Section. UNFC coding is not mentioned correctly in Section AA',BB',CC',DD',EE',FF' and needs to be corrected. Safety zone needs to be demarcated as per statute from Mines Office, Rest Shelter, ANFO Mixing Shed and Magazine. JJ', LL',NN',PP' cross sections should not be considered for reserves/resources estimation as both the sections have been prepared at 100m sectional interval and also the UNFC coding of both the sections are not correct. As per the lease sketch Nala is part of the granted mining lease area, hence in the section it should not be mentioned as non lease area. The G1 & G2 level explored area needs to be considered as per MEMC Rules-2015.Unnecessary extension of the area under G1 and G2 level of explcration needs to be avoided as it mounts to incorrect reserves/resources estimation.
- f) As per the exploration details submitted there is no Waste, so the index in the Geological Cross Section needs correction.

21) Under Chapter 1(j) of Part-A,

- a) Reserves and Resources as per UNFC with respect to the threshold value notified by IBM to be furnished as
- b) Block wise area explored under different level of exploration with resources and grade needs to be furnished in the text.
- c) Feasibility study report along with financial analysis for economic viability of the deposit as specified under the UNFC field guidelines needs to be annexed.

- d) In the feasibility axis justification under sub head Other Factors different statutory clearance required for mining with No, Date, Capacity and Validity needs to be submitted in text.
- 22) Under Chapter 1(k) of Part-A, section wise/Bench Wise Mineral reserves/resource needs to be submitted with weighted average grade.
- 23) Under Chapter 1(l) of Part-A,
- a) In the parameters considered for reserves/resources estimation Ultimate pit limit, Cut off, recovery percentage needs to be submitted.
 - b) Grade wise reserves/resources needs to be submitted.
 - c) Reasons needs to be submitted in respect of the resources blocked under different heads with UNFC codes.
 - d) Additional Mineral reserves/resources estimated needs to be furnished.
- 24) Year wise future exploration programme over the entire potential mineralised area should be proposed as per the provision of rule 12(4) of MCDR-2017.

Mining-

25) Part-A Chapter 2.A.(a) Existing and Proposed Mining Method-

- a) In the existing mining method, mention the existing mining pit boundary co-ordinates, dimension and no of benches developed and blasting parameters, mining machinery used needs to be submitted.
- b) In the Proposed Mining method-
 - i. Pit design i.e bench height, width, ramp etc needs to be proposed as per statute.
 - ii. Proposal for accounting the ore mined and despatched to be submitted and status of installation of Weigh Bridge to be submitted.
 - iii. All mining proposal to be submitted above the Ground Water (GW) table and for mining below ground water table permission from CGWA be submitted.

26) Part-A Chapter 2.A. (b) year-wise tentative Excavation -

- a) Submit the Insitu Tentative Excavation strictly table as per the format of mining plan guidelines.
- b) Proposal needs to be submitted only for the balance period of 2020-21.
- c) Instead of "Ore: Waste ratio" mention "ROM: Waste ratio" and Top soil generation should not be considered for calculation of ore to waste ratio.
- d) The bench wise weighted average grade of proposed mining block for each year needs to be submitted.
- e) Bulk density needs to be established scientifically and the test report needs to be submitted.

27) Part-A Chapter 2.A. (d) Salient features of the proposed method of working-

- a) Basis of achieving powder factor of 6.5 needs to be submitted..
- b) Details of explosives Magazine needs to be submitted.
- c) Blasting Parameters and pattern, types of explosives to be used, Precaution during blasting, requirement of explosives, source and provision for storage of explosives needs to be submitted in this chapter rather than in Part-A Chapter 2(e).
- d) Extent of Mechanization needs to be discussed here instead at Part-A Chapter 2(f).

28) Part-A Chapter 2.A. (f) Conceptual Mine planning-

- a) Conceptual Mine planning upto the end of lease period i.e upto 23.08.2066 needs to be submitted taking into consideration the present available reserves and resources instead of upto the life of mine.
- b) As no of bore holes have been terminated in mineralised zone, Conceptual exploration needs to be proposed to explore the entire mineralised area upto the end of mineralisation.
- c) Additional area required excavations, disposal of waste/top soil, reclamation and rehabilitation for each five year block period upto the end of lease period needs to be submitted in text.
- d) The five year block wise area for excavation, afforestation, back filling of voids, reclamation and rehabilitation needs to be submitted in the text and demarcated in plan.
- e) Afforestation all along the 7.5m safety zone needs to be submitted.
- f) Proposal for providing approach road to the Non lease area and fencing of Non lease area needs to be submitted.

Mine Drainage-

- 29) Maximum and minimum depth of workings needs to be submitted correctly.
- 30) Quantity and quality of water likely to be encountered in the mines and the pumping arrangements and places where the mine water is finally proposed to be discharged needs to be submitted.

Stacking Of Mineral Reject /Sub Grade Material And Disposal Of Waste

- 31) Utilization of top soil other than green belt development is not allowed. Details of top soil utilization like the co-ordinates, length width & height of topsoil spreading, volume be submitted. Further also proposal be submitted for stacking of balance Topsoil giving location co-ordinates, configuration, and sequence of year wise development along with protective measures.

Processing of ROM and Mineral Reject

- 32) Crusher location needs to be mentioned with respect to the Mine.

Progressive Mine Closure Plan-

- 33) Further last two quarter Environmental Monitoring reports needs to be annexed.
- 34) Table in respect of land put to use and proposed to be use needs to be furnished in the Progressive Mine Closure Plan. Weigh bridge area needs to be considered under area put to use. Further area required for Environmental protection measures like Retaining wall/bund, Green belt area, Check Dam needs to be furnished. Extent of Mining Pit area and internal road is not corroborating with PMCP plan.
- 35) All the environmental protection measures like Green Belt Development, top soil dump/stack, check dam and gully plugs, retaining wall, Environmental Parameters Monitoring be discussed and related information like Locations, co-ordinates, dimension, Quantity and Volume and Nos, frequency of sampling to be submitted in the text year wise in PMCP chapter.
- 36) Proposal for providing approach road to the Non lease area and fencing of Non lease area needs to be submitted.

Plans & Sections-

- 37) Date of survey needs to be mentioned.
- 38) Conceptual plan and section needs to be corrected upto the lease period. Index in the Conceptual Plans needs to be corroborated. First five year block needs to be marked in the conceptual plan. Conceptual Mining should be proposed only for reserves of category 111,121,122.
- 39) Reclamation plans to be submitted demarcating all the proposed environmental protection measures like top soil dump/stack, check dam and gully plugs, retaining wall/bund.
- 40) All the plans and sections should be submitted as per the provision of rules 31, 32, 33 & 34 of MCDR, 2017 and signed by the surveyor having Certificate of Competency of Survey from DGMS.
