



फाईल संख्या File No: 614(2)/MP-A/270/16-DDN

देहरादून, दिनांक 12.07.2017

सेवा में To श्री प्रदीप कुमार सेन,
काली मन्दिर रोड,
डोरान्डा, रौंची
झारखण्ड-834 002
pkseanranchi@gmail.com

विषय Sub : Mining plan including PMCP in respect of Sathpokram(Zinmund Telwani) Khrew Limestone area over an area (16.34 Hect.) at Tehsil Pampore, District Pulwama, State Jammu & Kashmir submitted under Rule 16(1) of Minerals (Other than Atomic And Hydro Carbons Energy Minerals) Concession Rules, 2016 & 23 of MCDR 2017

संदर्भ Ref. Your letter No- Nil dated 16.06.2017 received in this office on 21.06.2017

महोदय Sir,

This office is in receipt of two copies of the above-mentioned draft Mining Plan including Progressive Mine Closure Plan on 21.06.2017. On examination of the same the discrepancies / deficiencies observed have been listed in annexure.

You are advised to correct the submitted Mining Plan including Progressive Mine Closure Plan as per deficiencies /discrepancies pointed in the enclosed annexure and submit 3 fair copies of the Mining Plan including Progressive Mine Closure Plan within 15 days from the date of issue of this letter after corrections in hard bound copies (no spiral binding). If the fair copies of Mining Plan including Progressive Mine Closure Plan will not be submitted within stipulated time, final action will be taken as per rule. Two CDs of the fair Mining Plan including Progressive Mine Closure Plan may also be submitted including text, plates and annexures. On receipt of additional comments from State government, it shall be communicated to you subsequently. In case if it is necessary to incorporate the additional information, the details of the same should be given along with page numbers.

You are further advised to prepare the fair copies carefully and ensure that it is correct in all respect. Preferably use of paper on both the side should be made. If again deficiencies are observed then final action will be taken by this office without returning the copies for correction. This is issued with the approval of competent authority.

Encl: as above.

Yours faithfully, भवदीय,

(Handwritten signature)

(S. Saklani)

सहायक खनन भूवैज्ञानिक/AMG
कृते उप खान नियंत्रक एवं प्रभारी/ for DCOM & OIC,
भारतीय खान ब्यूरो/ Indian Bureau of Mines
OIC

प्रतिलिपि सूचनार्थ-

- 1- खान नियंत्रक (उ०), भारतीय खान ब्यूरो, उदयपुर।
- 2- M/s Khyber Industries Pvt.Ltd, Khayam Building, Nowpara Distt- Srinagar Pin-190001 (J&K)
(info@khybercement.com)

*पत्र प्रेषित किया
दि 0 12/7/17*

(Handwritten signature)

सहायक खनन भूवैज्ञानिक/AMG
कृते उप खान नियंत्रक एवं प्रभारी/ for DCOM & OIC,
भारतीय खान ब्यूरो/ Indian Bureau of Mines
OIC

Scrutiny comments in respect of Mining Plan alongwith PMCP for Limestone deposit over on area of 16.34 hect. near village Satapokhram(Zinmund-Telwani) Khrew tehsil Pampore, District Pulwama of J&K State submitted by applicant M/s Khyber Industries Private Limited, under Rule 16(1) of MCR 2016 & 23 of MCDR 2017.

1. On the cover page the name of the area is written as 'Satapokhran Pakhrabal Khrew whereas as per annexure 1 dated 03.06.2016 and 1A dated 29.11.2016 (letters from state government) it is Sathapokhram (Zinmund- Telwani). It needs clarification.
2. The exploration through Bore holes were done during the Dec-2016 to April 2017, as evident from Annexure 18, without having valid Prospecting license, therefore these details will not be considered for examining the mining plan.
3. Compliance of Rule 4 of Minerals(Evidence of Mineral Contents) rules, 2015 has not been incorporated.
4. There are several typographical mistakes which require to be corrected.
5. Experience certificate as per Rule 15 of MCR 2016 for preparation of mining plan is not enclosed.
6. All the proposals shall be within applied Mining Lease area only.
7. Type of land given at Chapter II is not supported with relevant authentic documentary proof from concerned land revenue department of the state government.
8. Latitude longitude at page 5 given is not authenticated by the State Govt. This will only be considered on authentication by the State Govt.
9. Exploration proposals are inadequate, incomplete and not as per guidelines and is not in line with Rule 12 of MCDR 2017.
10. Reserves & resources need to be reviewed thoroughly as per UNFC guidelines with scientific basis /calculations.
11. Details of Surface area within applied area brought under G-1, G-2 & G-3 level should also be given.
12. The proposal for future exploration is inadequate. Hole-wise location with depth and inclination, azimuth of boreholes should be given.
13. On page 16 under item f & g the rules of MCDR 1988 are quoted. This needs correction.
14. Bulk density of mineral used in computation should be supported by test report for NABL accreted Lab.

15. Yearwise production proposals are given in the text under mining chapter. Face length are not matching with the length indicated on the relevant plates.
16. Five benches are proposed to be opened during the first year. At the same time construction of a long approach road is also proposed during the first year. Thus proposal for construction of five benches is not feasible during the first year itself. It requires thorough review. Substantial quantity of limestone is also expected to be generated during the course of construction of approach road. Accordingly production schedule for the first year may be modified.
17. The proposed mining of limestone for ensuing 5 years has been made in the area where least exploration activities have been done during valid PL period, which is not a scientific proposal.
18. Bench slope angle less than 45° , is not correct design parameter, it may affect mineral conservation adversely. Further pit design parameters are incomplete. All pit design parameters including bench slope, overall pit slope, haulage width, gradient etc. should be clearly indicated and all should be reflected in relevant plan and sections.
19. Drill machines- correct specification should be given and at page 33 incorrect specifications have been given.
20. Capacity of Excavator $0.9m^3$ is not commensurate with the bench design parameters proposed from safety point of view especially in hilly terrain, further other equipment, specification in terms of HP are incorrect.
21. Blasting parameters are different at deferent page. Specific methodology to reduce and monitor ground vibration and air over pressure is not proposed in respective chapter /Para.
22. No area has been shown in land use / plan depicting crushing plant.
23. In chapter 5, specification of limestone to be used by applicant for cement plant shall be specified here.
24. It may be clarified whether there exists any wildlife /wildlife sanctuaries, National Park, forest sanctuaries etc within 10km around area. If so copy of order permitting mining operation in applied area from competent authority should be enclosed.
25. On page 59 to 65 under item 8.3.5 yearwise proposals are indicated. It is not matching with reclamation plan.
26. The applied area 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 keeping pollution and adverse impact under control for ensuing five years.

27. Under financial area calculation Green belt should not be considered for area put in use.

Plates

28. All the plans should bear a certificate that the plans and sections are prepared on the plan authenticated by the State government. 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.
29. From key plan the applied area is evident in forest land.
30. Date of survey on plan is not given.
31. Adequate air monitoring is not towards the prominent wind direction.
32. Bench design parameter is not reflected in any of the sections enclosed.
33. Geological Section: The scientific basis of various UNFC code is not evident in the sections.
34. No scientific basis has been given to substantiate the geomorphology given in plate 4A, i.e. Geological sections
35. In geological sections the section of proposed pit are incorrect from bench/pit design and layout of pit in given topography of applied land.
36. The layout of benches are not commensurate with the applied area(Refer year wise development plans).
37. Pit configuration in conceptual plan is not given, it must depict the haulage layout and major pit design parameters. By virtue of scrutiny pointed herein above especially from pit design aspect there may be changes in the section subsequently. This will effect on mineable reserve estimation.
38. Accordingly year wise development plan and section need to be thoroughly reviewed.
39. Plate No. 2 description is in Urdu, English or Hindi translation should be given.
40. Fresh area broken for 5 years, year-wise, should be given, matching with year-wise development/excavation plan.
41. Based on above scrutiny (and also scrutiny comments pointed out for plan and sections), area put to use for financial assurance calculation should be reviewed and made afresh.

42. At places inadequate bench width is shown and not safe for mining. Thus a serious look is required for such a hilly terrain design.
43. Contours are not appearing correct in environment plan and other plans as well.
44. Key plan, Surface plan, Surface geological Plan and Environment plan is not prepared as per provisions of MCDR 2017.

Annexures

45. KML file of lease area prepared from authenticated latitude and longitude coordinates should be submitted along with fair copies.
46. Original signature of the lessee would be required on the consent letter on fair copies. Xerox copy is not accepted.
47. Experience certificate of QP is not enclosed.
48. Certificates given by QP are not as per guidelines.
49. Precise demarcation report is not enclosed being the case of fresh grant. This should include latitude and longitude coordinates of lease corner pillars and linkage of one of the lease pillar with atleast three ground control points authenticated by the State government.
50. 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 drive contains the same text & plates as submitted in hard copy.
51. All the annexures should be attested by qualified persons for their authenticity.
52. Necessary documents are not enclosed stating the spatial relationship of applied ML area w.r.t PL.
53. Wherever Urdu is written/used, authenticated translation in English/Hindi shall be enclosed. (Refer Annexure-2 Page 2,3 &4).
54. Annexure 2(3rd page) is not legible.
55. Annexure 13: Feasibility report is not up to the mark as no details regarding economic / financial parameters are given.
56. Annexure 16: The geological prospecting report is undated.

End of comments