

Scrutiny comments on Modification in Mining Plan submitted by M/s The Ramco Cements Private Limited for it's Ravirala Revenue Mining lease over an extent of 124.33 hectare in Ravirala village, Jaggayapeta Mandal, Krishna District submitted under rule 17(3) of MCR 2016.

1. The document submitted under rule 17(3) as "Modification of Mining Plan" over 124.33 hectare for the Mining Plan document approved vide letter No AP/KSN/MP/LST-2-HYD dated 3/10/1989 over an extent of 289.94 hectare. But it has been noted that the lease under consideration is granted by State Government vide GOMs No 59 dated 2/4/1997 over an extent of 124.33 hect and lease was executed for the period 1/10/97 to 30/9/2017 in the name of M/s Madras Cement Limited against it's Lease application dated 27/8/1992. Subsequently, State Government accepted the change of name from M/s Madras Cement to M/s The Ramco Cement Limited for the said lease vide GOMs NO 96 dated 13/10/2015.

As per rule 22(4) of MCR 1960, the lessee never had a mining plan for the precise area against his lease application dated 27/8/1992. So the Modification of Mining Plan under rule 17(3) for the document approved on 3/10/1989 is not tenable. The nature of the document needs to be corrected accordingly as a Mining Plan.

It has been noted that the lessee has not maintained the boundary pillars in block 2,3,4, 5 and the block 6. The proposal be given to plot the same accordingly.

2. As far as the validity of lease is concerned , the State Government has issued the GO for extension of lease period vide GOMs No 60 dated 2/5/2017 and executed the supplementary lease deed with conditions relating to section 21(5) of MMDR Act and ongoing proceedings for determination/Lapsing of lease, mining plan etc for the period upto 30/9/2047. Clarity is required on the status of lapsing of lease , imposition of penalty if any under section 21(5) of MMDR Act etc be obtained from the State DMG Govt of A.P on the matter pending which document cannot be processed.
3. Noted that the present capacity for the plant is 4.685million tones clinker, for which the limestone requirement is about 6.559million tones per annum. Lessee is already having mining plan approved for 7.55million tones from its other 4 mines. Since the lease is granted for captive purposes, additional production requirement of 0.1million tone from this mine need to be justified properly.
4. Introduction need to be recasted properly to cover the necessary data pertaining to company/ mine only. It should be brief and cover the info on the above referred points.
5. In para 1.0(a) registered address of the company as per company's Act be submitted.
6. Para 2.0(a): The coordinates between which lease area lies be submitted
The lease area is having both government and Patta Land but the info in para 2.0(a) doesn't correspond to it, clarify and correct.
7. Clarify/ correct the information in para 3.1 ,3.2 and 3.6 in light of observation at point no-1 of the scrutiny comment.
8. In para 3.3 regarding review of Mining Plan, the information furnished needs correction and need to be reviewed against no proposal.Review be submitted for the entire lease period.
Exploration: Since the lessee was not having the mining plan for precise area, review for exploration cannot be done. It may be submitted accordingly. Table -7 on page 14 is not related to exploration . Hence corresponding corrections need to be done.
Mine Development and Exploitation: During inspection it was found that lessee has undertaken production until 2003 and no production has been achieved thereafter. However, the lessee has submitted that mining operations are not commenced in the approved document is not correct. The reason for non operation has been submitted as non acquisition of land but the status of acquisition of the same is still has not been provided.
Production is found to have been undertaken in the period upto 2003 but the site of excavation is not visible on the site. No excavation mark is seen in the area; most of the area is being used for agriculture purpose. This office is not having any returns for the mining operation period.
Year wise authenticated production dispatch report for the entire lease period be obtained from the State Government and submitted .

Geology:

9. Discuss the drainage pattern properly and elaborate it in Part 1.0(a) with special reference to the Paleru and Krishna river which are flowing immediately adjacent to the lease boundary. Discuss the HFL and highest rainfall in last 50 years.
10. It has been noticed that composite sample data for each borehole was given in the mining plan approved in 1989. Further noted that the litholog (in Form K) submitted by you in the document submitted for approval is not authenticated and its cognizance cannot be taken. The same be removed. Table 10 and table 11 is not verifiable and hence be removed. Only the geological data submitted in the approved document can only be considered. The certified true copy of the borehole data as in the approved document be enclosed as annexure.
11. The information in Annexure XIV can not be validated after so many years. Hence be removed.
12. In the description of local geology, occurrence of shale has been reported but in the area the shale has not been noticed or even mapped in the lease area. Hence the same need to be corrected. Summarised litholog data may be given from the boreholes lying in the lease area.
13. The exploration proposal need to be completed as per rule 12 of MCDR 2017, the proposal need to be given accordingly.
14. Geological sections for all the section lines are not submitted. Accordingly reserves and resources need to be assessed as per MEMC rules and backup calculation thereof be submitted. Total geological resource need to be assessed. Length of influence of sections for reserve calculation and the geological code assigned to it, need to be assessed correctly. The resource blocked below the water table should be categorized correctly. In light of forest boundary as shown in the toposheet, the mining should be proposed away from the forest boundary. A letter be obtained from the Forest department to this effect that lease area is not overlapping the forest area
15. The information on additional capital investment required for this mine be commented. The information on capital investment, cash flow statement be given to support the economic viability of the project.
16. Specifically comment on the status of clearances like from DGMS etc., forest/ non forest, land use data while discussing the parameters of economic axis.

Mining

17. The cut off grade has been submitted as limestone with 18% Silica whereas limestone requirement has been submitted as 12-13.5% Silica. The yearwise broad blend plan as per the quality of material proposed for production from the feeding mines be submitted.
18. For the year 2019-20 site preparatory work for dump site for phyllites, like preparation of garland drain, retaining wall and plantation around the plantation site be proposed.
19. Temporary stack may be proposed for top soil if required or else it may be simultaneously proposed. In the document also it need to be submitted accordingly.
20. The development and production benches be shown with different colours in the production and development plan. Surface drainage pattern need to be marked in all the plans as well.
21. Hydrogeological study is required for working below water table and is subject to the approval of the CGWB.

Conceptual Mining Plan:

22. The life of the mine need to be assessed considering resource and reserves as well.
23. Conceptual plan and section need to be prepared for the entire lease area. Showing conceptual size of the pit, size of phyllite dump, top soil stack and utilization, afforestation land use pattern at the end of this 5 year period and at the end of lease period be submitted.etc.

Mine Drainage

24. The water table need to be assessed on the basis of field data. The documentary proof for the water table assessed need to be submitted.
25. It has been understood that most of the lease area is lying within the HFL of the Krishna river. Since mining is proposed within HFL zone of the river, the safety precautions need to be

undertaken to prevent inrush of water into the pit during the high rainfall . HFL be marked and adequate measures be taken to prevent inrush of water.

26. It has been noted that the make of water in the pit has been assessed only for the land area put to use and catchment zone has not been considered. Thus proposal be given for garland drain around the pit in Mining , PMCP and mine drainage chapter.

Progressive Mine Closure Plan:

27. The one season base line data for air , water noise, soil, need to be submitted as per manual for mining plan.
28. Table 53 regarding environment proposals monitoring, water sprinkler etc need to be updated.
29. All the annexures and the text part need to be signed by the qualified person.

Surface Plan:

30. Clearly specify whether the bench mark , it's RL and the place from where it has been transferred.
31. In block 2 habitations have encroached into the lease but it has not been marked accordingly in the plate.
32. Old shiva temple wreckage in block 4 too has not been plotted.

Surface Geological Plan

33. The base Geological Plan from where the current plan has been developed , true to the scale be submitted as well.
34. Since boreholes approved in the document approved in 1989 has been taken as the basis for the location of the boreholes. The local grid lines of the same may also be superimposed on the Geological map and locations of the boreholes be marked accordingly. The boreholes lying outside be marked accordingly.
35. The dip and strike on the exposed portion of the lease be recorded and submitted accordingly. The same be recorded accordingly in the text.
36. The blocked resources due to temples , habitation, pond etc be marked accordingly in the plates.

Environment Plan

37. All the features within the 500m of the lease area has not been marked. The habitation around block 1,2 ,4 , temples near block 3 and the river edge and the grave yard near location 16deg, 50min 4.9 sec , 80 deg 6 min 42.5 sec has not been plotted.
38. Key plan: As per the toposheet, the lease area is overlapping the forest area at some places. However during the field inspection, the forest pillars are found to be existing adjacent to the lease pillars in the northern part. Hence the proposals for working, exploration be given only in the undisputed area and a letter be obtained from the Forest department to this effect that lease area is not overlapping the forest area. DGPS coordinates certified by the State Government may be submitted in annexure instead of in the text itself.

Others

39. Few photographs of the lease area important structure be enclosed.
40. If due to aforesaid changes data in other chapter or plate changes, they may please be corrected accordingly.



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



Phone No. : (040)-27539992/2753993
Fax No.(TF): (040)-27539991
E-Mail : ro.hyderabad@ibm.gov.in
No. AP/KSN/MP/Lst-2A/Hyd

Room No.603, 6th Floor,
CGO Towers, Kavadiguda,
Secunderabad – 500 080
Date. 16.7.2019

To
Shri P.R. Venkatrama Raja, Nominated owner,
M/s Ramco Cements Ltd.,
KSR Nagar, Jaggayyapet (M)
Krishna District 521 457 (A.P.)

Sub: Submission of Modification of Mining Plan in respect of Ravirala Limestone mine(Revenue) over an extent of 124.33 ha in Sy.No. 20,28,38 etc., in Ravirala(V) Jaggayyapeta (M) Krishna district, A.P. submitted under Rule 17(3) of MCR, 2016.

Ref: Your letter no TRCL/IBM/R.Revenue/206/111 dated.10.06.2019.

Sir,

With reference to your letter cited above on the subject, the site inspection of the mine was carried out by Shri Manish.K.Maindiratta, RCOM accompanied by Shri Jani Reddy, Agent and Shri P.Suryanarayana Murthy, Qualified person and found certain deficiencies as given in Annexure. The same has been forwarded to you and your Qualified Person on respective e.mail ids i.e., minesjpm@ramcocements.co.in, psm@ramcocements.co.in

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,

(Shailendra Kumar)
Regional Controller of Mines

Copy to Sri P.Suryanarayana Murthy, QP for information and necessary action.

(Shailendra Kumar)
Regional Controller of Mines

मूल पति पर नहीं
खान नियंत्रक (द), भारतीय खान ब्यूरो, बेंगलुरु।

)शैलेन्द्र कुमार(
क्षेत्रीय खान नियंत्रक

