



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

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Room No.603, 6th Floor,  
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To

Date:

Shri P.R. Venkatrama Raja,  
M/s Ramco Cements Ltd.,  
"AURAS Corporate Centre"  
Vth Floor, 98-A, Dr. Radhakrishnan Road,  
My Lapore, Chennai – 600 004  
Tamilnadu State

Sub: Submission of Modification of Mining Plan in respect of Jayanthipuram Limestone mine over an extent of 88.35 ha in Sy.No. 39, 40, 42, 45, 47/1 etc of Jayanthipuram (V) Jaggayyapeta (M) Krishna district, A.P. submitted under Rule 17(3) of MCR, 2016.  
Ref: Your letter no TRCL/IBM/20, dated.09.08.2018.

Sir,

With reference to your letter cited above on the subject, table scrutiny of the mine was carried out by Shri M. Pratap Reddy, AMG and found certain deficiencies as given in Annexure. The same scrutiny comments have already been forwarded to you and your Qualified Person on respective e.mail ids i.e., [minesjpm@ramcocements.co.in](mailto:minesjpm@ramcocements.co.in), [psm@ramcocements.co.in](mailto:psm@ramcocements.co.in) & [anjan@ramcocements.co.in](mailto:anjan@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,

*Shivar*  
29/8/18

(Shailendra Kumar)  
Regional Controller of Mines

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

*Shivar*  
29/8/18

(Shailendra Kumar)  
Regional Controller of Mines

मूल पति पर नहीं

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

*शैलेन्द्र कुमार*  
29/8/18

(शैलेन्द्र कुमार)  
क्षेत्रीय खान नियंत्रक



Scrutiny comments on the Modification of approved Mining Plan submitted by M/s The Ramco Cements Ltd. for Jayanthipuram Limestone mine (South band) over an extent of 88.35 hectare in Sy.nos 39, 40, 42, 45, 47/1 etc of Jayanthipuram Village, Jaggayyapet Mandal, Krishna Distt. AP State

1. All certificates should be signed in original by the nominated owner.
2. The Cover page should display with the details like lease period (Grant & Expiry Date), Mine code, IBM registration no, Block period, proposed plan period, Lessee's Address, Qualified person's name & addresses including mail id and contact no.etc. should be furnished.

**Introductory Note:**

3. The Company's name had changed from Madras Cements limited to The Ramco Cements Limited and accepted by State Government of AP. In brief a para be spelled out about the passage from Madras Cements Ltd to The Ramco Cements Ltd with the relevant documents as annexure.
4. The Plant capacity, Limestone requirement, feeding mines, approved capacities be furnished.
5. The details of Sri.N.Ravishankar be omitted.
6. The rated capacity of Cement plant should commensurate to the approved quantity of mines feeding to it. The rated capacity of the instant lease should be computed based on the approved quantity of all other leases linked in the vicinity with the capacity of cement plant. The contribution/supply of Limestone to the proposed Clinkerisation unit (Line-III) and the existing units from all the mines should be spelled out. The rated quantities of Limestone of respective mines vis-a-vis capacity of cement plant be discussed. This information be furnished in Tabular form with the supportive documents as annexure. There is no rationality by simply enhancing the production from 0.5 million to 2.5 million Tonnes and keeping other mines idle without any production. The drastic enhancement of production by 400 times is not acceptable.
7. The Limestone consumption factor with reference to subject mine be commented.

**General:**

1. In para 1.0(a), the correct address with the address proof of the nominated owner be furnished.
2. Para 2.0 (b): The Survey nos. with extent breakup be furnished.
3. Para 2.0 (c): The Para with regards to Jaggayyapet Extension Reserve Forest be checked for its correctness. Regarding Geo Coordinates Table-5, it is stated that the Geocoordinates, if certified by the State authority, a statement be made accordingly as 'asper the certification done by the State authority, the Geo coordinates have been furnished as below.' It is also be checked once the Geo coordinates of GCPs displayed vide Photographs at page-1 with Table no.6.

4. Para 3.1: Details of approval of MP/SCM along with their validity period be furnished in Tabular form with respective copies of approval letters as annexure. Under remark column, the rule under which the document is approved also be mentioned.
5. Para 3.3 Review of earlier approved proposals of the various items may be reviewed on year wise basis in Tabular form. The review be done for the earlier five year period in addition to three years of the current block period with due justifications if any deviations.
6. Para 3.4. The status of compliance of the Violations during the preceding five year period and current three years period be furnished in Tabular form with the relevant Violation letters and replies thereof in Annexure form. The manner in which they have been compiled also be spelled out.
7. Para 3.5. The prosecution with regards to excess production under Court of law has not been mentioned.

#### Part A

#### Geology and Exploration

8. Para 1.a.) A reference from which the MSL has been brought forward be mentioned. The basis of fixing highest flood level of the Paleru River as 38 MSL has not been discussed. The same is neither marked on ground nor in any plan.
9. Para 1 b.) The subject ML area formations have not been equated with the Regional Geological setup of Vindhyan type area (Semri Series) and Cuddapah Super group. The Regional Strike and Dip have been wrongly designated.
10. Para 1 c.) It is stated that this para is 'Not applicable'. It is not correct. Partly this para has been dealt under the preceding paragraph (1 b.). The Local Geology need to be dealt by furnishing the Local Geological Succession and formations/Litho units encountered then followed by the description of the formations/Litho units, disposition and their economic significance etc.
11. Para 1 d): The address detail of ERDC agency has not been furnished.
12. Para 1.0(e) (i): The details of Trial pits and Trenches are missing.
13. Para 1.0 (e) (ii): The coordinates of the Boreholes have not been furnished. The nomenclature of DTH Boreholes in text(SPBH-) differs from the relevant Annexure(DTH).
14. Para 1.0 (f)&(g): The Rule of MCDR be corrected.
15. Para 1.0 (i): This para does not spell out the justification of the sufficiency of the exploration already carried out. However, there is area left out on the Northern part of the ML area with G2 scale of exploration. There is also an extent of G4 scale of exploration. These areas need to be converted into G1 Scale of Exploration and Exploration proposals be made accordingly.
16. Para 1,0 (J): This para has not been dealt as per the guidelines. No details of relevant items are furnished.

17. Para 1.0 (k): No proper justification of the categorization of deposit is done since there exists a up thrust where the Phyllite formation of Cuddapah Super group is in juxtaposition and overlies the Narji formation of Kurnool group of rocks. The year of exploration be properly spelled out. The revised Threshold values have not been taken into account while estimating the resources/reserve. The recovery factor has not been spelled out since there is a incidence of subsurface cavities/cavity fillings in the ML area. The 100% recovery as stated is not acceptable. The CaO cut off grade has not been mentioned. An irrelevant information has been furnished under the Geostatistical analysis Para. The item 9(other factors), the latest statutory provisions be mentioned. The reserve/resource estimation is exaggerated when compared to the previous approved document though there is little bit exploration done by means of DTH Boreholes. The estimates need be done properly by projecting the actual litho logs on to the Geological cross section as per the comment vide Plate-V(Geological Cross sections).
18. The para D) Mineral Reserves/Resources Table and Table no.17 to 81 be checked once for its correctness in view of the parameters considered for the resource/reserve estimation and comments pertaining Geological Cross Sections. The no. of samples and percentage of samples sent for NABL Lab for Analysis has not been spelled out. The copy of the NABL Certificate is not enclosed.

## 2.0 Mining

19. Para 2A c): Individual year wise development---: The year wise development & Production in Cum/ Tonnage be spelled out in the text form referring the Coordinates, bench RLs etc with respective plans and layout sections. The manner by which the year wise disposal of waste if any shall be done be spelled out. It is not quite understood that by enhancing 400% of production level, how the mineral conservation and life of the mine shall get enhanced? Further this Para needs to be reviewed as per the comment vide Para 6 of Introductory notes. The nature of overburden and Mineral Reject be clearly defined.
20. Para 2B II: Instead of furnishing a blank table, a statement be spelled out.
21. Para 2 F: The Conceptual Plan be reviewed as per the comment at Introductory notes and Para 1.0(k)
22. In para 3.0(c), Assess the maximum accumulation of water in the pit and the pumping arrangement available in the mine be discussed to flush out mine water. No quality analysis of water has been furnished. For the seepage water calculation 270 days have been taken into account whereas for water withdrawal 310 days have been taken. Pl. clarify. The impact of assessment of the conditions by the APWALTA may be briefly spelled out.
23. Para 4 b: It is simply stated that the dumped area is non mining area but it is not clear that it is a mineralized or non mineralized area. If it is mineralized area, the re-handling of the same in future to be spelled out.
24. Para 5: Nothing is spelt about the Mineral Rejections and its nature. though there are Mineral rejections.

**Progressive Mine Closure Plan:**

25. Para 8.1 Environment Base line information: A plan in appropriate scale be appended with the text depicting core and buffer zone of the ML area with the monitoring stations.
26. Para 8.3.1 The location of the Mineral reject dump be properly referred with the Coordinates.

27. Para 8.5: Under Economic Repercussions, the nature of Employment has not been spelled out. Further it is said compensation will be given but under what circumstances it will paid has not been said.

**Annexures:**

All the sample analysis reports be place at one place.

**Feasibility study Report:** The Threshold values be revised as per latest notification. The information furnished under subhead of Geo-Statistical analysis is irrelevant and uncalled for. No Geostatistical information is furnished. The Reserve/resources be recasted as per the comment vide Para 1.0(K)

**Plates:**

**Plate no.1B:** The Key Pan has not been prepared as per Rule 32(5) of MCDR,2017. The existing mines with in 5km radius be shown. The extremities of the ML coordinates have not been drawn.

**Plate-IIA (Lease sketch):** This Plan is not in confirmation with that of Plate-IIB. All the Plans should be in accordance with the certified lease Sketch along with the Geo Coordinates.

**Plate-III (Surface Plan);** No HFL line has been drawn and indexed. The 7.5m, 50m barrier zones and UPL be distinctly marked. The Mine Surveyor Certificate no. has not been mentioned. The bench mark for surveying be marked.

**Plate-IV (Surface Geological Plan):** Though the Strike and dip has been indexed but the same has not been marked in the Plan. The Cross section limits from the lease end to other end be clearly marked. The G1, G2 & G4 scale of exploration, 7.5m, 50m barrier zone and UPL be distinctly marked.

**Plate-V (Geological Sections):** No collar RLs of Boreholes has been mentioned. Litho logs of the Boreholes Viz C/1S/1, SPBH-2 in Section ML-1S, Borehole no.SPBH-3 in Section ML-2S, Borehole no.S/3S/1, C/3S/1. C/3S/2, in Cross section ML-3S, Borehole no.C/4S/1, C/4S/3(depth also) in Section ML-4S, Borehole no. C-6S/1, in Section ML-6S, Borehole no. SPBH-4 in Section ML-7S, Borehole no S/8S/1 in section ML-8S and Borehole no. SPBH-8 and C/9S/1 in section ML-9S be checked for the correctness as per the lithologs and redraw the Cross Sections. In reserve/resource estimates, the depth component be restricted to Borehole depth only in respective Sections. In view of this discrepancy the reserve/resource need to be re-assessed. The 7.5m and 50m and UPL be distinctly marked. Proper Geological index has not been furnished.

**Plate-VI and VII, VIII, IX** are to be reviewed and redrawn as per comments vide Para no. 6 of introductory note, Para no 1.0(K) and Plate -V. The contours be deleted in the area demarcated for the proposed production and instead spot RLs be given in Plate VI.

**Plate-X (Environmental Plan):** The contour lines be extended up to 60m line. Landuse pattern is missing. HFL be shown. The irrelevant items from the index be omitted.

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