



भारत सरकार / Government of India  
खान मंत्रालय / Ministry of Mines  
भारतीय खान ब्यूरो / Indian Bureau of Mines

क्षेत्रीय खान नियंत्रक का कार्यालय / OFFICE OF THE REGIONAL CONTROLLER OF MINES  
100, ओल्ड नेहरू कालोनी, देहरादून (उत्तराखण्ड) 248001 / 100 Old Nehru Colony, Dehradun (U.K.) 248001

TEL - 0135-2676350 / 2671896, FAX 0135-2674962; E-mail - ro.dehradun@ibm.gov.in



फाईल संख्या File No: 614(2)/MP-A-269/16-DDN

दिनांक 27.04.2018

सेवा में To	श्री राकेश पुरोहित, खनन अभियन्ता, 17E/403, C.H.B. जोधपुर-342 008 (राजस्थान) rkconsultantsjodhpur@gmail.com	श्री एस0 के0 सोनी, भूवैज्ञानिक, J3C-1, सुभाष कालोनी, गली नं. 4 Defence Lab Road, जोधपुर-342 011 (राजस्थान) Soni.sarnar.shailendra@gmail.com
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विषय/ Sub : Submission of Mining Plan with Progressive Mine Closure Plan in respect Bandel Ganddor Naginder Khrew Limestone Area over an area of 24.10 Hectares at Village- Bondel Ganddor Naginder, Tehsil- Pampore, District- Pulwama, State-Jammu & Kashmir of M/s Khyber Industries Pvt Ltd. Srinagar submitted under Rule 16 (1) of Minerals (Other than Atomic And Hydro Carbons Energy Minerals) Concession Rule, 2016 & 23 of Mineral Conservation and Development Rules-2017

संदर्भ/Ref. : Your letter No. Nil dated 13.03.2018 received on dated 04.04.2018

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Review and Updation of Mining Plan including Progressive Mine Closure Plan on 04.04.2018. 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 as scrutiny comments 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 issues with the approval of competent authority.

Encl: as above.

भवदीय/ Yours faithfully,

(एस. साकलानी S-Saklani)

सहायक खनन भूवैज्ञानिक AMG

कृते प्रभारी अधिकारी For Officer In Charge  
भारतीय खान ब्यूरो Indian Bureau of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर।
- 2- M/s Khyber Industries Pvt. Ltd. Khyber Building, Nowpora, Distt- Srinagar-190001 (J&K)
- 3- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, एनसीआर, सीजीओ कॉम्प्लेक्स, नई दिल्ली।

सहायक खनन भूवैज्ञानिक AMG  
कृते प्रभारी अधिकारी For Officer In Charge  
भारतीय खान ब्यूरो Indian Bureau of Mines

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Scrutiny comments indicating deficiencies in respect of Mining Plan with PMCP of Badnel Gandoor Naginder Khrew limestone area of M/s Khyber Industries(24.10 hect.) in Pulwama district of J&K State submitted under Rule 16(1) of MCR 2016 & 23 of MCDR 2017.

1. On cover page in period of proposal : yet to be executed therefore it will be 5 years from the date of registration of executed lease deed.
2. 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.
3. Photo Id of applicant is not legible.
4. As per sanction order of PL dated 07.03.2006, village Bodnel, Ganddor, Naginder is mentioned whereas on the application applied by the applicant for a mining lease village Badnel, Ganddor Naginder Khrew is indicated. Clarification from the state government regarding the correct name / spelling of village is required to be obtained.
5. On page 12 and 13 under heading Regional Structure, Fold and Faults- This needs to be rechecked.
6. Being the fresh area sufficient number of exploratory bore holes at a grid interval of atleast 200 mtrs are to be proposed with justified dip, azimuth, depth etc..
7. Area under G-2 and G-3 axis has not been considered. No specific clarification has been given in this regard. Further area which is mineral potential but not under G-1 then it should be proposed for further exploration as per rule 12(4) of MCDR 2017.
8. UNFC code 111 – yet mining plan and other proposal are under process then UNFC code need to be reviewed accordingly. Recoverable reserves in prospecting report not matching.
9. On page 23 reserves to the tune of 12.716 million tonnes(blocked) have been indicated under 121 category whereas on page 24 these reserves are indicated under 111 category. It is not correct thus needs clarification/rectification.
10. Under chapter mining it is mentioned that one old pit is created ( not by applicant) covering an area of about 0.015 hectares. This statement is not correct. The applicant has carried out prospecting in the area and old pits must have existed consequent to prospecting carried out in the area. It needs clarification.
11. Secondary drilling and Jackhammer drills to be avoided in eco system zone. Bench height 8 mt to be reviewed in view of slope of lease because access from the other bench is an important aspect and cannot be ignored. Ultimate pit slope of 45 degree need to be reviewed.
12. 8 mtrs height of benches are proposed. With the proposed deployment of mining machinery, adequate justification for maintaining the height of benches to 8 mtrs is to be given. May kindly note that the level difference is 200 m in ML area, thus height of bench shall also have geo technical stability.
13. Proposal should be avoided for secondary blasting.
14. Pit configuration and orientation may be reviewed in light of above, during I-V year proposal.
15. No overburden is anticipated to be generated whereas on page 60 under table 8.3 .5, 470m long toe wall of dump is proposed to be constructed. This is contradictory. On the other hand on page 33 it is mentioned that to check rolling down, check dam is proposed of length 470m at three locations towards southern side.
16. Occupational health aspects w.r.t. silicosis, free silica analysis of sample is to be made.
17. Annexures XVIII & XIX are irrelevant. It does not pertain to this area.
18. 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.
19. All the proposals should be made within the ML only.
20. Proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco sensitive zone.
21. There are several typographical mistakes which require to be corrected.



22. All the annexures should be attested by qualified persons for their authenticity.
23. Two CDs 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. KML file shall also be submitted along with final submission.
24. Page 36 of the text review bench height, hole inclination, burden, spacing, volume, tonnage & limestone blocked per meter of hole etc.

#### Plates

25. Working plan for fourth year and fifth year- Index is incomplete. All the year wise working plan to be reviewed in light of any change in bench configuration of UPL as pointed out elsewhere in this scrutiny comments.
26. Sections depicting year wise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.
27. Wherever sections are drawn original ground profile must be shown on every section.
28. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
29. Conceptual plan- Boundary of applied area is not visible clearly. This plan is to be drawn carefully. It has impact on calculation of Reserves & Resources and thus it is to be drawn carefully & should be implementable. Similarly only conceptual position of pit at the end of lease period or mine life whichever is early shall be given.
30. Conceptual plan should be prepared on scale of 1:1000. Further this plan need to be reassessed in light of the terrain and topography of the ML area, as the orientation of mine faces may affect mineral conservation and safety aspect of mining operations.
31. G section i.e. G1/G2/G3 level of exploration not shown in surface geological plan.
32. Accordingly feasibility report will also be modified.
33. Depth level of channel not evident in Geological cross sections of plate 4A.
34. Plate 8 font color not legible.
35. Plate 5 : Proposal for 1<sup>st</sup> year plan are not explicitly given. Abbreviation need to be written with its full version at least at one place. like HR is used.
36. Plate 5A : HR is not depicted properly in sections.
37. Longitudinal sections should also be given as the section given with various plan is not depicting true slope of pit / benches.
38. Key plan spelling should be corrected.
39. Plate 9 : Area put to use should be written.
40. Plate 7 : Need to redraw / replan in view of natural slope & orientation of bench with regard to safety & mine conservation Also give Longitudinal section to depict bench design parameter.
41. UPL marked on Surface Plan and Surface Geological Plan is not appearing correct as the slope of lease is such and that too a part of hilly slope, this proposal in corners of such lease not appearing pragmatic for actual implementation then needed thorough review at QP / lessee end. This plan to be given in 1:1000.
42. All the proposals and documentation shall be in accordance with the MMDR Act 1957 as amended upto date and various other rules made thereafter. Any lapse shall be tantamount to hiding of the facts.

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SL - 27/4/18