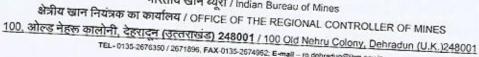


## भारत सरकार / Government of India खान मंत्रालय / Ministry of Mines

भारतीय खान ब्यूरो / Indian Bureau of Mines



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



फाईल संख्या File No: 614(2)/MP-A-273/18-DDN

दिनाक 10.05.2018

सेवा में/ To :

श्री पंकज पाण्डे, कन्सल्टैंट (परामर्शदाता ),

सहज सहयोग कन्सल्टैंट्स प्रा0 लि0,

बी-1/21, सेक्टर-बी, अलीगंज, লব্দনক-226 024 (ব0 प्र0)। sahajsahyog990@gmail.com

विषय/ Sub : Submission of Review & Updation of Mining Plan with Progressive Mine Closure Plan in respect Bufliaz/Sanglani Limestone Mine over an area of 15.89 Hectares at Village- Bufliaz/Sanglani, Tehsil-Surankot, District-Poonch, State-Jammu & Kashmir of M/s Mehr Cements Pvt. Ltd. submitted under Rule 17 (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 Nil received on dated 20.04.2018

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 20.04.2018. 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

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 Encl: as above.

(एस.सकलानी S Saklani) सहायक खनन भूवैज्ञानिक AMG कृते प्रभारी अधिकारी For Officer In Charge भारतीय खान ब्यूरो Indian Bureau of Mines

## प्रतिलिपि सूचनार्थ प्रेषित :-

- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर।
- 2- . मैं. मेहर सीमेन्ट्स प्रा. लि. 7 सी/ सी, गांधी नगर , जिला- जम्मू -180 004 (जेएण्डके) M/S Mehr Cements Private Limited, 7C/C, Gandhinagar, District Jammu-180 004 (J&K) e-mail: mehrcementspvtltd@gmail.com

उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, एनसीआर, सीजीओ कॉम्प्लेक्स, नई दिल्ली ।

74:4218

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

तियारी cl.1 C:\Users\ibm\Desktop\Unicode\For.Scr. Baffiaz Sanglani Mehr Cements.doc

Scrutiny comments indicating deficiencies in respect of submitted Review and updation of Mining Plan with PMCP of Bufliaz/Sanglani limestone mine of M/s Mehr Cements (P) Ltd (15.89 hectares) in Punch district of J&K State submitted under Rule 17(1) of MCR 2016 & 23 of MCDR 2017.

 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 has not been enclosed. 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 coonfiguration given in the lease plan.

Khasra map is not legible.

- Coordinates are not matching shown over surface plan, khasra map and text.
- On cover page lease period is indicated upto 29.06.2015. No letter from State government is enclosed regarding extension of lease period.
- Consent letter from the lessees is without date.
- Review & Updation of Mining Plan Period to be given for 5 Year Period.
- 7. Details and Address is not as per registration under rule 45 of MCDR 1988.
- Proposal should be given for 5 year period as per Rule 17(1). As no mining plan/SoM is submitted/approved for the mine, after First MP which was approved during ML grant.

Board resolution in favour of person "Nominated Owner to sign the correct letter is not attached.

- If Mining plan is expired on 29.06.2015, then under which Provision Mining plan is submitted.
- 11. Under chapter 3.0 give the details of proposed production, details of excavation carried out since the inception of mine (opening of mine) yearwise.
- Regional geology of the area may be checked. It should be confirmed whether Karewas formation lies in the area.
- 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.
- Reserves and resources need to be updated. Nil quantity in G-2 is not a true fact.
- 15. On page 17 reserve under 331, volume in cum figure given is 6474 which is not correct. Correct figure should be given.

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- 16. As limestone production used in own Cement plant as stated elsewhere in text but no adequate detail are given in chapter 5.0.' Use of Minerals" mineral rejects'.
- 17. On page 17 reserves are indicated. Almost 100% increase(wrt approved MP) in 111-reserves, without much exploration. Then justification/review of R& r is essential with supporting sections. Systematic and scientific mining to be carried out for conceptual mining plan as well.
- Yearwise tentative excavation is given for two years only. Furnish five years planning proposals..
- Conceptual planning as evident from conceptual plan is incomplete and not in line with mineral conservation aspects.
- 20. On page 31 the term 'with brush' is mentioned. What is this.
- 21. On page 32 employment potential is given. Qualification of ME & geologist should be as per MCDR 2017.
- 22. On page 35 area occupied need to be reviewed thoroughly.
- 23. Every blast to be monitored for ground vibration and AOP.
- 24. On page 39 afforestation programme should be given for five years. Similarly under table 8.3.5, proposals should be given for five years.
- 25. Review financial area calculation afresh.
- 26. On consent letter spelling is wrong.
- Form J is enclosed. Receipt of J&K government in appropriate form is not given.
- 28. Drilling, blasting with jack hammer with ordinary detonator will lead to lot of ground vibration and air over pressure in eco sensitive zone. Thus both drilling and blasting need to be optimized further so as to give concrete proposals to keep ground vibration under control.
- 29. Dimension of faces shown for the fifth year is not matching with the dimension shown on page 21.
- On similar page the term opencast semi mechanized is indicated which is wrong.
- 31. On page 24 nil proposals have been indicated for reclamation / rehabilitation which is not a true fact.
- 32. On page 27 it is mentioned that no seasonal / perennial drainage exist in the lease area whereas prominent drainage has been shown on the relevant plates which is contradictory.
- 33. Air, water, vibration monitoring proposals are not given in para 8.3.
- 34. Proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco sensitive zone.
- 35. 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. The blasting proposals is

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not considered for approval, as the habitats/ dwellings are close to active mining area.

36. Being the hilly terrain suitable fencing proposals are not given in PMCP at para 8.3.

37. All the proposals should be made within the ML only.

38. There are several typographical mistakes which requires to be corrected.

39. All the annexures should be attested by qualified persons for their authenticity.

40. 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.

41. Maps should not be bounded with the text. Instead, separate plastic leaf

should be inserted to keep all the maps in it.

42. More representative photographs of the lease area may be enclosed.

## Plates

- 43. Key plan is not legible.
- 44. 3 ground control points on surface plan are not shown.
- 45. Surface plan is incomplete and all features are not shown, some of the habitat is visible on google image.
- Contradictory GPS points are given in text and drawing( abnormal variation).
- 47. UPL is not shown on surface plan.
- 48. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
- Level of exploration on G-axis is not given on SGP. Conceptual limit marked on SGP is not correct.
- 50. Plate no.6 &7- what is the year. Give financial year.
- Sections are erroneous and incomplete.
- Geological section- Depth extent of exploration is not shown. Proposed exploration is not shown. UPL section is not shown
- 53. Plate 4- UPL is not correct. Thus estimation of R&R is not correct. Key plan is not as per rule.
- 54. Plate 11- Assessment of area put to use is less than proposed.
- from stream is left. Further the UPL is not matching with the actual ground profile as entire area is covered under excavation whereas some of the area is not feasible for mining. More sections to be given. In Western portion no mining proposals during conceptual statge is given. Whereas limestone is reported.

- 56. On conceptual plan bench configuration is not given and the mine design parameters are also not found reflected through this plan and section. Adequate sections are not given. It has impact on calculation of R&R and thus it is to be drawn carefully & should be implementable.
- 57. Environment plan is not prepared as per guide lines of MCDR 2017. Many features to be shown beyond ML area is not shown.
- 58. Sections depicting year wise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.
- 59. More sections on geological plan showing UPL shall be given.
- 60. One composite section shall also be given for all five years.
- 61. Few more photographs showing lease corner pillars should be given.
- 62. Conceptual plan is incomplete/ incorrect and against systematic & mineral conservation point of view.
- UPL marked in various plan, section are not matching with conceptual plan.
- 64. Year-wise proposal, name of Year in terms of FY shall be given.
- 65. Depth, angle & location of DTH holes is not shown in G-Plan/G-Section.
- 66. Geological section not correct in plates.

LA 18/2/18