



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-B-247/2014-DDN

दिनांक 28.05.2018

सेवा में/ To : श्री पंकज पाण्डे, कन्सल्टेंट (परामर्शदाता), सहज सहयोग कन्सल्टेंट्स प्रा0 लि0,  
बी-1/21, सेक्टर-बी, अलीगंज,  
लखनऊ-226 024 (उ0 प्र0)।  
sahajsahyog990@gmail.com

विषय/ Sub : Submission of Modified Mining Plan with Progressive Mine Closure Plan in respect of Barwas Limestone mine over an area of 4.157 hectare in Village-Barwas, Tehsil-Paonta Sahib, District - Sirmour of HP State, submitted under Rule 17(3) of Minerals (Other than Atomic & Hydro Carbons Energy Minerals) Concession Rules, 2016 & 23 of MCDR 2017.

संदर्भ/Ref. Your letter No-Nil dated Nil received on dated 27.04.2018

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Modified Mining Plan with Progressive Mine Closure Plan on 27.04.2018. On examination of the same the discrepancies / deficiencies observed have been listed in annexure.

You are advised to correct the submitted Modified 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 Modified 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 Modified 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 Modified 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.

End: as above.

भवदीय Yours faithfully,

*(Handwritten signature)*  
28/5/18

(एस.सकलानी S Saklani)

सहायक खनन भूवैज्ञानिक Assistant Mining Geologist  
कृते उप खान नियंत्रक एवं प्रभारी अधिकारी For DCOM & Officer In Charge  
भारतीय खान ब्यूरो Indian Bureau of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर।
- 2- मैसर्स बरवास माइन्स, गांव - बरवास, पोस्ट- कमरऊ तहसील-पांवटा साहिब जिला- सिरमौर(हि.प्र.)
- 2- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, एनसीआर, सीजीओ कॉम्प्लेक्स नई दिल्ली

११/११/१८

सहायक खनन भूवैज्ञानिक Assistant Mining Geologist  
कृते उप खान नियंत्रक एवं प्रभारी अधिकारी For DCOM & Officer In Charge  
भारतीय खान ब्यूरो Indian Bureau of Mines

**Scrutiny comments indicating deficiencies in respect of submitted Modified Mining Plan with PMCP of Barwas limestone mine of M/s Barwas Mines (4.157) hect.) in Sirmour district of HP State submitted under Rule 17(3) of MCR 2016 & 23 of MCDR 2017.**

1. 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.
2. Consent letter from the lessees is without date. Name and address details of Managing partner who is signing consent letter and all other documents as per rules need to be given.
3. Mine code is wrongly quoted.
4. On page 9 under item 3.6 Rules are wrongly quoted.
5. Annexures are not as per guidelines.
6. Pg No.09 3.6: Details to be given justifying the reason/facts as to why the mining plan is proposed for modification with proper (in vogue) reference of rules.
7. Pg No.13 Expenditure incurred in various prospecting operations: figures given in table are not correct and these are not exploratory pits.
8. Pg No.13 Item i): Inadequate proposals. Please give adequate no. of holes and their locations to bring entire area in G1. Previous proposals also to be given.
9. Pg 17 Reserves: Feasibility axis-1 in terms of mining aspect is smaller. South block of lease is not appearing proper.
10. On pg 17: Reserves of block 1 and block 2 are indicated. This much of reserves with G1` axis with boreholes to be clarified and reviewed. Thus updated R&R entirely be reviewed .
11. Geological Section to be redrawn again.
12. Pit profile to be used correctly to arrive at feasible R&R. R&R need review in line with UNFC guidelines.
13. Pg No.24: Method of initiation should be such so as to keep air over pressure and Ground vibration minimal.
14. Pg 25: Extent of Mechanization: Please avoid for secondary drilling being eco sensitive zone and close to highway. Dia of hole is to be given.
15. Wagon Drill: model no. should be given.
16. Pg 26: Ultimate pit limit: Proposals are not correctly designed and depicted in plates as in some of the area mining cannot be feasible.
17. Address and mail Id of QP is not given on cover page.
18. On page 8 under proposals for the year 2017-18 have been discussed. RLs indicated are arbitrary. The lowest RL is around 1007 whereas the highest RL is around 1122.
19. 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.
20. Air, water, vibration monitoring and its stations are not proposed in para 8.3 nor shown in RP/Env plan.
21. Proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco sensitive zone.
22. No proposals for waste dumps are incorporated. Based on the field observation, some quantity of waste is expected to be generated during the course of mining in the Block -I. Thus waste dump proposal is to be incorporated.

23. On page 36 under item 8.2(i) breakup of area is wrong.
24. On page 39, plantation proposals are incorporated but this is not reflected on reclamation plan.
25. On page 31 under chapter use of mineral (item d), specification of limestone and consuming industries is to be given.
26. Further highway is passing. Slope of benches should be kept adequately and have to maintain it every point of time.
27. Various proposals are given outside the mining lease. Such proposal will not be considered.
28. In mining chapter bench design parameters including bench height, face slope, over all pit slope, haul road width and gradient shall be given.
29. Surface features and spatial configuration of ML (especially southern block which is isolated) is not matching with Google satellite image. ( when given coordinates KML is super imposed)
30. Further environmental plan is not prepared as per Rule 32(5)(b) of MCDR.
31. Various proposal of plantation in PMCP proposals are made outside the ML area which will not be considered with the MP.
32. 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 not considered for approval, as the habitats/ dwellings are close to active mining area.
33. Being the hilly terrain suitable fencing proposals are not given in PMCP at para 8.3.
34. All the proposals should be made within the ML only.
35. There are several typographical mistakes which requires to be corrected.
36. More representative photographs may be enclosed.
37. All the annexures should be attested by qualified persons for their authenticity.
38. 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.
39. Maps should not be bounded with the text. Instead, separate plastic leaf should be inserted to keep all the maps in it.

#### **Plates**

40. 3 ground control points on surface plan are not shown.
41. Plate 5 – Basis of G-axis for depth extension not given.
42. There is substantial variation in surface features marked on surface plan as well as on the other plans. It need through review for making surface features the only systematic and scientific planning including PMCP proposals for fencing, green belt etc.
43. UPL is not shown on surface plan.
44. Please check feasibility of mining before assessing G, axis as 1. Pit bottom shall be of adequate width.
45. Separate section to be drawing for assessing R&R for block-2 (southern)
46. Virtual width of section 5-5 is oblique for Block-2 (southern)
47. UPL is not marked properly.
48. Financial Assurance Plan – proposals outside ML cannot be considered for approval.
49. Geological Plan – Section line to be drawn separately for southern block or it should be such that as far as possible oblique section with reference to pit designed be minimal.

50. Geological Sections are not drawn correctly. These are not pragmatic for pit bottom design.
51. Exploration proposals should be given as per guidelines and MCDR 2017 Rule 12.
52. UPL should be within 7.5m zone. Moreover in this UPL 7.5m barrier is kept same which is not correct.
53. UPL section should superimpose on geological section and should match with conceptual plan and its section.
54. Actual location of nalah is not matching with satellite image.
55. Financial area assurance plan is wrong. Area put in use has not been indicated.
56. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
57. Level of exploration on G-axis is not given on SGP.
58. 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.
  
59. Environment plan is not prepared as per guide lines of MCDR 2017. Many features to be shown beyond ML area is not shown. All streams are not shown. Contours within 60m are not shown.
60. Proposed excavation sections depict bench height more than design parameters.
61. The basis of design of UPL is not evident in SGP/ SG sections.
  
62. Please re-check the contours. It has impact on calculation of proposed excavation.
63. More sections on geological plan showing UPL shall be given.

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28/5/18