



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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No. AP/GNR/MP/Lst-29/HYD

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

To
Sri Bimlendra Jha, MD & CEO
M/s Ambhuja Cements Ltd.,
Elegant Business Park, Behind Kotak,
Mahindra Bank, MIDC Cross Road 'B', Off.
Andheri Kurla Road, Andheri (East),
Mumbai – 400 059.

Sub: Submission of draft Review of Mining Plan in respect of Nadikudi Limestone Mine (ML-I) of M/s Ambhuja Cements Ltd., over an extent of 277.87 ha in Nadikudi & Alugumallepadu villages, Gurazala Mandal, Guntur dist., A.P. submitted under Rule 17(2) of MCR, 2016.

Ref: Your letter no.ACL:MR:Nadikudi: ML-I:MP:2019:1dt 12.7.2019 and email dt 16.8.2019
Sir,

With reference to your letter cited above on the subject, inspection of the mine was carried out on 9.9.2019 by Shri Ibrahim Sharief, Sr.ACOM accompanied by Sri Amit Sharma, Qualified person and found certain deficiencies in the form of scrutiny comments as given in Annexure. The same scrutiny comments have been forwarded to you and your Qualified Person on e.mail id i.e. rajoo.joshi@ambujacement.com, pankaj.saran@ambujacement.com, amit.sharma@ambujacement.com, santwana.sahu@ambujacement.com

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 Pankaj Kumar Saran, Sri Amit Sharma and Mrs Santwana Kumari Sahu for information and necessary action.

(Shailendra Kumar)
Regional Controller of Mines

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

(शैलेन्द्र कुमार)
क्षेत्रीय खान नियंत्रक

Scrutiny comments in respect of Nadikudi Limestone Mine over an extent of 277.87 ha in Nadikudi village, Gurazarla Mandal of Guntur district of Andhra Pradesh belongs to M/s Gujarat Ambuja Cement Ltd.

1. The State Government vide its memo no. 13584/M.III(2)/2015 dated 31/01/2018 extended the time period to commence the mining operations by 31/12/2019 and Cement Plant to be constructed by 31.03.2022. Whereas the document is submitted to this office after lapse of substantial time period after issuance of the above said memo, which needs justification.
2. Feasibility report duly authenticated by the authorized officer on behalf of Board of Directors of the company should be submitted containing time schedule of commission of mining project inclusive of equipment planning and scheduling.
3. Justification for not operating mining lease/ delay in the project should be submitted with supporting documents. Further chronological events since grant of lease up to date incorporating lapsing/ restoring etc. should be furnished.

Status of Lessee:

4. As per the records submitted under Company's Act it is noted that
(i) M/s Ambuja Cements Limited was originally incorporated on 20.10.1981 and later on the company's name changed to M/s Gujarat Ambuja Cements Limited on 17.05.1983 (refer, Annexure V 2/3).
(ii) M/s Gujarat Ambuja Cements Limited was originally incorporated on 20.10.1981 as per Company's Act and later on the company name was changed to M/s Ambuja Cement Limited on 05.04.2007. (Annexure V 1/3)
Both the above submissions are not in consonance with each other. Please submit the relevant documents to establish the name of the lessee
5. Sy. Nos. not included in the land schedule of lease deed should be excluded and accordingly plans should be updated.
6. Copy of Board resolution by Board of Directors of the company to nominate the person to sign the document as per the provision of MMDR Act and rules made there under, should be submitted.
7. The document should have been submitted as "Review of Mining Plan" instead of 'Modified Mining Plan'.
8. As per provision of rule 15 of MCR 2016, the document should be submitted by a responsible person i.e, Qualified person only and not the qualified persons. Hence only one person be made responsible for the purpose of submitting the view of the lessee to the department and making corrections in the document.
9. Details of the earlier approved documents should be submitted in chronological order.
10. Incorrect/ un-necessary statements are furnished in the document which should have been avoided.

Location and Accessibility

11. Only the Co-ordinates (Latitude & Longitude) of lease boundary pillars authenticated by State Government should be furnished in the document.
12. Details of land schedule as per lease deed executed should be furnished.
13. Public road is passing through the lease area, the details of the same is mentioned in page no.11.
14. Para 3.2, Details related to last Modification in Mining plan should only be submitted, other unnecessary statements is not warrant in the para.

Review of Mining plan

15. In the Review chapter, item wise review of earlier approved scheme period from 2013-14 & 2014-15 should be furnished. The period from 2015-16 onwards in which there is no approved document be furnished as "Lapse period".
16. Para 3.4, Details of violations pointed by IBM since 2013-14 should be furnished with supporting document and also submitted clearly stating 'violations are complied or not'.
17. Para 3.6, The document should be submitted as Review of Mining plan hence no comments are required in this para.

Geology

18. Depth persistence pertaining to ore/ waste encountered in bore holes should have been furnished in tabular form.
19. Exploration carried out in the lease area under G1, G2, G3 level should be furnished in tabular column.

20. Please comment about compliance of rule 12(4)(a) of MCDR 2017 to carry out exploration in the potential mineralized area up to contact zone in G1 level.
21. Cost of exploration to be furnished with documentary evidence.
22. Details of exploration carried out should be furnished in the tabular form as below

SL no.	Area explored under				Total lease area
	G1 level (ha)	G2 level (ha)	G3 level (ha)	Unexplored area (ha)	

23. Details of future exploration programme should be furnished in tabular form indicating bore hole no., location & grid interval.
24. It is noted on verification of earlier approved document and in the present submission that, Proved reserves (111) and probable reserves (121,122) have been increased from 83 million tonnes to 107 million tonnes and 1.21 million tonnes to 8.0 million tonnes respectively without any additional exploration.
25. Weighted average grade of the reserves/ resources should be computed and furnished.
26. Parameters like depth of water table encountered in the area, village road, Dwellings/ temple/ Grave yard, Nala/ Stream/River etc. should have been considered for reserve estimation. Further, Reserved need to be re-assessed in line with the provision of MEMC Rules 2015 and Revised threshold value for Limestone notified by IBM.
27. All the back-up calculations for assessment of reserves/ resources should be furnished in the annexures only and duly signed by the Geologist appointed as per statute and Qualified person.
28. Reserves should have been estimated considering the depth of water table encountered in the lease area.
29. Reserved need to be reassessed and submitted in line with the provision of MEMC Rules 2015 and Revised threshold value of Limestone notified by IBM.
30. Feasibility report needs to be modified and submitted in the prevailing conditions considering cost estimation, cost schedule with over all summary of the project for final evaluation, capital cost, operating/ Mining/ Processing Cost, impact of Taxes, financial indicators etc.

Mining .

31. No mining activity has been carried out so far in the lease area, in this regard, development/ production proposals should be proposed for balance period of 2019-20 (from September 2019) and subsequent period from 2020-21 onwards, in line with the State Government memo no. 13584/M.III(2)/2015 dated 31/01/2018.

Progressive mine closure plan

32. Copy of EIA/ EMP approved by MOEF should be submitted, accordingly details of Base line data and EIA/ EMP should be suitably modified.
33. Geo-referenced cadastral map of the lease area furnished in the document is not acceptable without authentication of State Government.
34. Every plan, section or part thereof prepared under these rules shall be signed by the mining engineer/ Geologist appointed under rule 55 of MCDR, 2017.
35. Surface plan
 - (i) The surface plan submitted needs to be updated as per actual field condition. River, village roads are observed passing the lease area, the same should have been incorporated.
 - (ii) Details of section line, UPL is not required to be indicated in this plan.
 - (iii) The surface right area held by the lessee should be indicated.
 - (iv) Contours in the lease area should be depicted clearly.
36. Geological Plan and sections
 - (i) Geological sections should be submitted on 1 : 2000 scale for clarity, indicating collar RL of Bore holes drilled, bore hole no.s, bench RL
 - (ii) The geological plans and sections shall be certified and signed by the geologist employed under rule 55.
37. Year wise development plans and sections

year wise development plans and sections should have been submitted on scale of 1 : 2000 scale.

In view of the above relevant para in the text part as well as plans and sections should be suitably modified.

