



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

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फाईल संख्या File No: : 614(2)/MP-B-285/2008-DDN

देहरादून, दिनांक 09.05.2018

सेवा में/ To : श्री पंकज पाण्डे, QP sahajsayog990@gmail.com  
सहज सहयोग कन्सल्टेंट्स प्रा0 लि0,  
बी-1/21, सेक्टर-बी, अलीगंज,  
लखनऊ-226 024 (उ0 प्र0)।

विषय/ Sub : Submission of Modified Mining Plan along-with Progressive Mine Closure Plan in respect of Banour Limestone mine over an area of 4.958 hectare in Village- Banour, 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. MCG/DBSLM/HP/2018-314 dated 31.03.2018 received on dated 03.04.2018  
महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Modified Mining Plan including Progressive Mine Closure Plan on 03.04.2018. On examination of the same the discrepancies / deficiencies observed which have been listed in enclosure to this letter.

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 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 paper on both the side. If again deficiencies are observed then final action will be taken by this office without returning the copies for correction. Please keep the plates in flaps and not to be binded with plan.

Encl: as above.

भवदीय/ Yours faithfully,

(पुष्पेन्द्र गौड़ / Pushpender Gaur)

उप खान नियंत्रक एवं प्रभारी अधिकारी  
Deputy Controller of Mines & OIC

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर।
- 2- मै0 एम0सी0 गोयल एण्ड संस, 99/3 -3, गंगा विहार, हरिद्वार रोड, देहरादून।

उप खान नियंत्रक एवं प्रभारी अधिकारी  
Deputy Controller of Mines & OIC

**Scrutiny comments indicating deficiencies in respect of submitted Modified Mining Plan with PMCP of Banaur(Dhanwasa Mona) limestone mine of M/s M.C.Goel & sons (4.958) hect.) in Sirmour district of HP State submitted under Rule 17(3) of MCR 2016 & 23 of MCDR 2017.**

1. On cover page and everywhere change the name of mine to Banour instead of "Dhanwasa Mona Banour".
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. Consent letter from the lessees is without date.
4. ID of lessee is not legible. Id of the other partner is not given.
5. *Coloumn of Email ID is left blank.*
6. Compliance of exploration proposals incorporated in the previous scheme of mining are not given. Deviation if any shall be pointed out.
7. 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.
8. Out of RoM the non saleable part, if observed, limestone of different size fraction, its proper sale usage shall be explored to carry out zero waste mining.
9. As the UPL in Geo section is not correct & also not matching with that given in conceptual plan and section therefore Reserve- Resource estimate at page 16 need to be estimated afresh at K2.
10. UK to be changed to Uttarakhand.
11. Email id should be mentioned correctly everywhere.
12. On page 4 in location mention mining lease from to correctly.
13. On page 6 give exploration details as per modified SOM in tabulated form.
14. On page 7 give reason for deviation in afforestation programme.
15. On page 8 in sec 3.6 correct it as In case the MP is submitted under rule 17(3) of the MCR 2016 for approval of modification, specify reason and justification for modification under these rules. Also give the rules as modified MP is submitted.
16. On page 13 Bore hole not shown in Geo section in order to more depth extent upto UPL more bore hole to be proposed from proven field exploration.
17. On page 15 Area is not correct. What about remaining portion of Mining lease area?
18. On page 16 Under K2 quantity should be reviewed in ref UPL in G section.
19. *Page-16-Depth considering for the calculation of quantity of mineral on G1 axis is not mentioned under the table.*

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20. On page 20 Limestone carried manually but MSOM for fully mechanized mine is submitted. Please explain why 2 pits will be opened on hilly slope & whether it is safe to work on top & bottom simultaneously in some of the coming years. Need review from mineral conservation and safety aspect. Specify the diameter of wagon drill and try to avoid jack hammer and why jack hammer be used with wagon drill? Also try to avoid jack hammer for secondary blasting.
21. On page 21 pit / road level is not used elsewhere so please define else it is not appearing justifying. Also review Pit II exploitation.
22. On perusal of page 21 under tentative excavation it is observed that no waste has been anticipated to be generated. Based on the past inspections it is observed that atleast 10% waste is being generated in the form of dolomitic boulders at the mine. Consequent to this, proposals for waste dump were incorporated in the previously approved scheme of mining. But in the present submission dump proposals have not been incorporated. In view of this entire excavation proposals are required to be made a fresh. Relevant plans and sections are also required to be changed accordingly.
23. *Page-23- Waste and ROM /waste ratio should be incorporated in table with reference as pointed out in scrutiny point 22.*
24. On page 24 Review imitation / ignition as it is eco fragile zone so imitation and propagation of energy upto hole initiation be eco friendly.
25. On page 25 no proposal for dust suppression is given.
26. On page 26 re check pit & quarries at the review and updation of mining plan period.
27. On page 36 Retaining wall is either on excavated area or on undisturbed area so review the aspect before making proposals in PMCP.
28. On page 37 each & every blast monitoring to be prepared and provision for each and every blast monitoring to be made here also.
29. On page 44 Review financial assurance / area put to use & accordingly FA to be prepared.
30. Pit dimensions mentioned in the text are not matching with the dimensions shown on the relevant plates.
31. Air, water, vibration monitoring and its stations are not proposed in para 8.3 nor shown in RP/Env plan.
32. Proposal for daily monitoring of ground vibration / AOP due to blasting shall be incorporated in mining plan being the area eco sensitive zone.
33. 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.

34. Being the hilly terrain suitable fencing proposals are not given in PMCP at para 8.3. Blast monitor is not given.
35. Use of mineral on page 31 is indicated for chemical and cement industry whereas on page 19 under reserves the grade is indicated as cement and bhatta only. Thus conflicting statement has been given. All the proposals should be made within the ML only.
36. There are several typographical mistakes which needs to be corrected.
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.

### **Plates**

39. 3 ground control points on surface plan are not shown.
40. UPL is not shown on surface plan.
41. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
42. The plantation done so far is not shown/ evident in SP.
43. On conceptual plan, existing plantation is not reflected.
44. Level of exploration on G-axis is not given on SGP.
45. 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.
46. Environment plan is not prepared as per MCDR 2017. Many features to be shown beyond ML area is not shown.
47. Sections depicting year wise excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given.
48. More sections on geological plan showing UPL shall be given.
49. On plate 2 prominent wind direction not given.
50. On plate 3 insert row give detail for purpose of plan as per rule 31(a).
51. Latest survey to be carried out for preparation of plan and sections.
52. Plate 4 plan is incomplete.
53. Plate 5
  1. No exploration is evident in sections.
  2. UPL limit shown is thus inconsistent.
  3. UPL limit shown is incorrect as well as mining is not feasible at pit bottom in V shape.

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4. PL shall be designed with the case of bench face / slope, provision of haulage route etc. and other pit design parameters as the mine is in eco fragile & hilly terrain. This observation is also valid for conceptual plan & section.

5. The sections should match with conceptual plan section so redraw.

54. Plate 6 UPL is not shown in section .

55. Plate-6 – *Proposed exploration during year 2018-19 has not been shown in plate.*

What does wire created wall @ section arrow mean? Where is UPL? Why plantation is proposed on benches which appear to be further excavated?

56. Plate 7 observations are same as observed on plate 6.

57. Benches generally do not have such sharp notches. Review and redesign it. Haulage route is not evident / shown in plan.

58. Check on plates that how plantation is proposed on benches which are coming under excavation in ensuing years?

59. Reassess the area put to use for FA calculation.

60. No proposal outside ML area shown in various plates will be considered for approval

61. Plan is incomplete not as per MCDR 2017.

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09/05/18

10. UPL to be changed to Uttarakhand.

11. Error is should be mentioned correctly every page.

12. On page 4 in location mention mining lease boundary correctly.

13. On page 8 give description details as per schedule 2018 in tabulated form.

14. On page 7 give reason for deviation in afforestation program.

15. On page 8 in sec 4 is correct it as in case the mine is situated under rule 17(2) of the MCR 2017 for approval of modification, modification request is submitted for modification under these rules. And government has to give approval if is submitted.

16. On page 11 bore hole not shown in plan section. If shown it should be shown upto UPL. Bore hole to be provided from previous bench upward.

17. On page 15 Area is not correct. What about remaining portion of Mining lease area?

18. On page 16 Under K2 quantity should be reviewed in ref UPL in G section.

19. Page-16 Depth considering for the calculation of quantity of mineral on G2 axis is not mentioned under the table.