



भारत सरकार/Government of India
खान मंत्रालय/Ministry of Mines
भारतीय खान ब्यूरो/Indian Bureau of Mines
हैदराबाद क्षेत्रीय कार्यालय/Hyderabad Regional Office



Phone No. : (040)- 29553603/29554603
E-Mail : ro.hyderabad@ibm.gov.in

Room No.603, 6th Floor,
CGO Towers, Kavadiguda,
Secunderabad – 500 080
Date :12.10.2021.

No. AP/ANP/MP/LST-59/Hyd.

To
Shri D.Lakshmi Kantham, Nominated Owner,
M/s Penna Cement Industries Ltd.,
Flat No 1003, E block,
DSR Fortune Prime Apartments,
Durgam Cheruvu Road, Madhapur
Hyderabad, Telangana State.

Sub: Submission of Modified Mining Plan including PMCP in respect of Gudipadu Limestone Mine (Auction Block) of M/s Penna Cement Industries Ltd. over an extent of 40.816 ha. situated in Gudipadu Village, Yadiki Mandal, Anantapur District, Andhra Pradesh State submitted under Rule 17(3) of MCR, 2016.

Ref: Your letter no. PCL:GLM:MMP:2021-22 dated 22.09.2021.

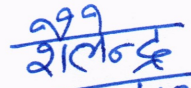
Sir,

With reference to your letter cited above on the subject, the site inspection was carried out on 29.09.2021 by Shri Shaival Kartikeya, SMG of this office accompanied by Shri. K.Rambabu Qualified Person and Shri Veera Raghavulu, Lessee's Representative. The draft Modified Mining Plan has been examined and the scrutiny comments have already been forwarded to you and your Qualified Person on respective e.mail ids i.e., dlkantham@pennacement.com and rambabu.k@pennacement.com.

02. You are advised to attend the deficiencies as per the annexure and resubmit the document, complete in all respects, in three final bound copies along with soft copy in the form of CD (4Nos) 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,

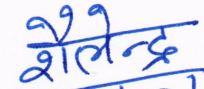

12/10/21

(शैलेन्द्र कुमार)
क्षेत्रीय खान नियंत्रक

प्रतिलिपि सुचनार्थ एवं आवश्यक कार्यवाही हेतु अग्रेषित

1 खाननियंत्रक (द), भारतीय खानब्यूरो, बेंगलुरु।

2. Shri. K.Rambabu, Qualified Person.


12/10/21

(शैलेन्द्र कुमार)
क्षेत्रीय खान नियंत्रक

Annexure

Scrutiny comments on examination of Modified Mining Plan including PMCP of Gudipadu Limestone Mine over an area of 40.816 Hect. of M/s Penna Cement Industries Limited in Gudipadu Village, Yadiki Mandal, Anantapur District of Andhra Pradesh State inspected by Shri S. Kartikeya, Senior Mining Geologist on 29/09/2021

1) **General oversight & Cover Page:** (a) The submitted draft Modified Mining Plan has not been digitally signed by the Qualified Person. (b) During the study of the document, it has been found that the execution of the Mining Lease has been done after the notification of the MMDR Amendment Act, 2015, and the Mine Development and Production Agreement (MDPA) has been signed with the State Government. In the earlier approved mining plan, it has been found that the production of limestone in the fifth year has been proposed as 520296.00 metric tonnes. Whereas, in the present submitted draft, the production has been reduced in the fifth year i.e. 500040.00 metric tonnes. Since the entire production plan and its achievement is linked with the Mine Development and Production Agreement between lessee and the State Government, hence a "No Objection Letter" should be obtained from the competent authority of the State Government for reduction of the production of mineral/ore/ROM from the approved proposal. (c) According to the enclosed Geological Report on Limestone resources for Gudipadu Block prepared by the Department of Mines and Geology, Government of Andhra Pradesh, Total Resource of Limestone has been estimated as 26656071.00 Metric Tonnes (26.66 Million Tonnes) and the Performance Security has been calculated based on the total resources 26.66 Million Tonnes of Limestone, whereas, in the Chapter No. 2; Geology and Exploration; Total resource has been re-estimated as 22981848.00 Metric Tonnes (22.981 Million Tonnes). Hence, any changes in the estimation of the mineral resources mentioned in the Geological Report on Limestone resources for Gudipadu Block prepared by the Department of Mines and Geology, Government of Andhra Pradesh may not be accepted. Further, Out of Total Resources of 26.66 Million Tonnes, Reserves and Resources should be bifurcated. (d) Instead of blank column/row, N.A. or appropriate information may be given for better identification with proper justification in the Remarks column. (e) Cover Page: (i) Mining Lease period should be mentioned. (ii) The term 'Prepared By' may be replaced with the term 'Qualified Person' in all the relevant places of the submitted document. (iii) Mine Code, Email Id, Contact Number, fax Number of the Lessee etc. should be mentioned in the Cover Page. (f) Since the modification of the Approved Mining Plan has been submitted in the last week of September 2021, hence, retrospective proposal for the begging of September 2021 may not be accepted. Further, necessary corrections should be done in all the respective places. Further, all the proposals should start from 01/10/2021 onwards. (g) Several spelling mistakes have been found in this document e.g. Name of the District has been mentioned 'Ananthapur'. Hence, all the mistakes should be corrected. (h) All the pages of the document including annexure should be numbered and duly signed by the Qualified Person for better authenticity. (i) Bid value in percentage may be mentioned in the cover page.

Chapter No. 1.0 General Information

2) Page no. 3: (a) Para 1.1: (i) Since the lessee has not applied for the Mine Code of this mining lease so far, hence, the appropriate term like "Application for allotment of the mine code will be submitted to the IBM, once the date of commencement of mining operations will be finalised" may be used. (ii) Since Lessee/Company is a Limited Company, hence, the Type of lessee should be mentioned as "Limited Company". (b) Para 1.1.1: Date of initial grant and the validity of the mining lease should be cross checked and corrected accordingly. (c) Para 1.1.2: Appropriate reason should be given for Modification of the Approved Mining Plan e.g. The Present Modification has been done for Change in the Production Schedule of Limestone to fulfill the requirement of the Captive Plant.

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- 3) Page no. 4: (a) Para 1.2: Para 1.2: Sum of the cadastral area is not matching with the actual area granted for mining lease. Same may be cross checked and corrected accordingly. Further, individual Cadastral wise details should be given. (b) Para 1.3.4.1 and 1.3.4.2: A term 'Limestone' should be written under the bracket as suffix with 'ROM Mineral in tonnes'. (c) A term 'Metric Tonnes Per Annum' should be written as suffix with the quantity mentioned for production.

Chapter No. 2.0 Geology and Exploration

- 4) Page no. 8; Para 2.1.2: Name of the River, Type of the Power Transmission Line/Telephone Line, Name of the Nearby Village, Nearest Railway Station, Nearest Port, State Highway/National Highway are to be written in this table.
- 5) Page 9; Para 2.1.3: (a) Para 2.1.3: Source of the Geological Succession should be mentioned for reference.
- 6) Page no. 11; Para 2.2: Complete and appropriate summary of the previous exploration should be given.
- 7) Page no. 12; Para 2.2.1.7: Complete details of the Exploration agency should be given.
- 8) Page no. 17; (a) Para 2.2.1.11: A term 'Limestone' should be written under Type of Sample. (b) Para 2.2.1.12: Whether any beneficiation study has been proposed to carry out during this plan period, should be mentioned.
- 9) Page no. 21; (a) Para 2.2.4.2: Resource Calculation should be given in accordance with the DMG Report. (b) Para 2.2.4.4: During inspection, it has been observed that the CaO with 34% and above will be utilised in the Captive Cement Plan. Hence, the Cut Off value of limestone should be mentioned as 34% CaO. (c) Page no. 22; Para 2.2.4.11: Category wise sum of the calculated resources should be given.
- 10) Page no. 24: Para 2.4.13: (a) An appropriate unit for estimation should be given. E.g. Thousand Tonnes/Million Tonnes/Tonnes/Lakh Tonnes. (b) Average grade of Limestone should be written along with the average range of other analysed radicals.
- 11) Page no. 25; (a) Para 2.5.5.1: During the study of the borehole logs it has been found that most of the boreholes have been closed/terminated in the limestone. Hence, the present drilled boreholes are not indicating the depth wise mineral persistency in the area. Hence, few core boreholes upto the depth of mineralization may be proposed. (b) Para 2.2.5.7: For better assessment of the average grade of limestone, sampling of core should be done in 1.0 m interval. Further, Latitude and Longitude of each proposed boreholes may be given.

Chapter No. 3.0: Mineral Beneficiation / Processing

- 12) Page no. 26: Since the Crusher has been erected in the adjacent mining lease and the new crusher will not be installed in this mining lease, hence, the details of the crusher are not essential to submit. Further it should be clearly mentioned that the limestone with 34% CaO and above will be segregated within the working pit before dispatch.

Chapter No. 4.0 Mining

- 13) Page no. 30: (a) Para 4.1.2: Proposed method of mining should be elaborated considering the achievement of the proposed production target in manner of scientific, systematic and sustainable development. (b) Para 4.2.1.1: Year wise details of the proposed development should be incorporated in this para. E.g. Area covered by Pit (Ha) and Pit Dimension. (c) Para 4.2.1.2: Since the overburden will be stacked along the 7.5 m barrier zone, hence, the details of the overburden dumping should be given in this para.
- 14) Para 4.2.2: (a) Para 4.2.2: (i) Instead of Year 1, 2, 3, specific financial year should be mentioned in all the respected places of this document. (ii) Max Height and Width of the benches in overburden has been written as 'Zero' which is incorrect. An appropriate bench height of the overburden and the topsoil should be mentioned. (iii) Slope of the benches in mineral (degree) and Number of Benches in Topsoil have been mentioned as 'Zero' which is incorrect. An appropriate and correct information should be given. (b) Para 4.2.2.2: (i) Percentage symbol

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should be mentioned for Recovery of Ore/mineral from ROM. (ii) Range of the Easting and Northing should be given for location of Advancement. (iii) Incorrect stripping ratio has been calculated.

- 15) Page no. 33; Para 4.3.2: (i) Stripping ratio should be corrected. (ii) Grade range should be corrected as 'above 34% CaO'.
- 16) Page no. 37: (a) Para 4.4.5.1: For sizing of the oversize boulders generated during mining operations from the top benches, proposal for deployment of the rock breaker may also be given. (b) Para 4.4.5.2: Complete details of drilling machine like diameter of the drilling bit and the depth wise drilling capacity of the machine should be mentioned. Whether the compressor is attached with the machine or not may be clarified.
- 17) Page no. 40: Para 4.7.2: Since the topsoil/overburden will be stacked along 7.5 m barrier zone, hence, all the essential details should be incorporated in this para.
- 18) Page no. 41; Para 4.9: Complete chemical specifications in respect of all radicals should be given.

Chapter No. 5.0 Sustainable Mining

- 19) (a) Para 5.1: All the essential information should be given based on the proposed production during five year plan period as well as proposed CSR activities under company act. (b) To improve the Ratings under the Sustainable Mining, all the parameters may be considered and likely to be covered, as prescribed in the template as well as in the manual. (c) During inspection it has been found that several locations have been identified for erection of the solar panel over the 7.5 m barrier zone area to reduce the load of the power consumption. Hence, proposal should be submitted accordingly.

Chapter No. 6.0 Progressive Mine Closure Plan

- 20) During inspection it has been observed that near Boundary Pillar no. 49 at 7.5 m barrier zone plantation have been done. Hence the baseline information of the plantation done up to date should be mentioned.
- 21) Page no. 53: (a) Para 6.2.2.2.1: To protect the lease area from the unlawful entry, fencing may be proposed all along the lease periphery in phase manner. (b) Para 6.2.2.2.2 and 6.2.2.2.3: Details for construction of the retaining wall and the garland drain may be given.
- 22) Page no.55; Para 6.2.6.3: Proposal for year wise recreational facility should be given.

Chapter 7.0 Financial Assurance / Performance Security

- 23) Page no. 57; Para 7.3: Complete details of the Performance Security should be furnished.

Chapter No. 8.0 Review of Previous Proposals

- 24) A general and similar remark "No mining activities are commenced so far" for the reason of deviation from the earlier approved proposal may be written in all the relevant places.

Plates:

- 1) **General: Lease Map:** (a) Identification number/Plate no. should be given for the lease map. (b) All the features and different colour lines may be shown and described in the index.
- 2) **Plate I; Key Plan:** (a) Description of the red colour line may be given in the Index. (b) Co-ordinate range of the mining lease area may be drawn.
- 3) **Plate II; Surface Plan:** Since the plantation has been done near Pillar no. 49, hence, same should be shown in the plan.
- 4) **Plate III; Surface Geological Plan:** Since most of the lease area is mineralised and it has been proved through the exploration, hence, an appropriate pattern for limestone occurrence in the lease area may be shown. Further wherever the mineral is covered/capped with the topsoil/OB may be marked with specific symbols over the limestone pattern.
- 5) **Plate IV; Geological Cross Sections:** (a) UNFC code in the index may cross checked and corrected accordingly. (b) For better identification Datum Line RL may be shown in both ends of all the

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sections. (c) Beyond borehole depth and without any subsurface data, depth wise continuity of the Pink Shelly Limestone may be removed from all the relevant sections.

- 6) **Plate V(A) to V(E); Production and Development Plan and Sections:** (a) Subsequent changes (Year wise) in the RL of Topsoil Dump and Working Pit should be marked in all the sections. (b) Ramp should be shown in all the relevant sections as well as in the index.
- 7) **Plate IX; Environment Plan:** Existing mining lease of the same lessee towards southern side of Gudipadu Limestone mine should be marked in this plan.
- 8) **Plate XII; Financial Assurance Plan:** Area utilization in different heads should be marked with the distinct patterns for better identification in the plan.
