



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-A-272/17-DDN

देहरादून, दिनांक 12.10.2017
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सेवा में To श्री एस. एस. रावत
मै0 हॉल्टेक कन्सल्टिंग प्रा0 लि0
हॉल्टेक सेन्टर ए ब्लॉक, सुशान्त लोक,
गुड़गाँव -122 001 (हरियाणा)

डॉ0 पुनीत निगम
मै0 हॉल्टेक कन्सल्टिंग प्रा0 लि0
हॉल्टेक सेन्टर ए ब्लॉक, सुशान्त लोक,
गुड़गाँव -122 001 (हरियाणा)
(info@holtecnet.com)

विषय/ Sub : Submission of Mining Plan with Progressive Mine Closure Plan of Dewra Limestone measuring over an area 90 ha in Mauza/Villages- Dewra, Jangle Dwaras, , Tehsil-Arki, District-Solan State of Himachal Pradesh of M/s Asian Concretes and Cement Private Limited under Rule 16(1) of Minerals (Other than Atomic And Hydro Carbons Energy Minerals) oncession Rule, 2016 and 23 of MCDR 2017

संदर्भ/Ref. Your letter dated 07.09.2017

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Mining Plan including Progressive Mine Closure Plan on 07.09.2017. 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 should be given along with page numbers.

पत्र प्रेषित किया
दि 0.16/10/2017

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.

Encl: as above.

भवदीय Yours faithfully,

(एस.सकलानी S Saklani)

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

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर। (sent by mail)
- 2- मै0 एसियन कन्क्रीट्स एण्ड सीमेन्ट प्रा0 लि0 एससीजी 270 मोटर मार्केट, मन्सादेवी रोड, मनीमाजरा चण्डीगढ -160 101 (harishaga@gmail.com)
- 3- उप खान नियंत्रक एवं प्रभारी अधिकारी, भारतीय खान ब्यूरो, क्षेत्रीय कैम्प कार्यालय, एनसीआर, सीजीओ कॉम्प्लेक्स नई दिल्ली। (sent by mail)

सहायक खनन भूवैज्ञानिक Assistant Mining Geologist
कृते प्रभारी अधिकारी For Officer In Charge
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Scrutiny comments, indicating deficiencies in Submitted Mining Plan and Progressive Mine Closure Plan (MP) along with supporting document of Dewra limestone area of M/s Asian concretes & Cement Pvt. Ltd(90 hect.) in Solan district of HP State submitted under Rule 16(1) of MCR 2016 & 23 of MCDR 2017.

1. On page 8 of the text it is mentioned that the total area as per khasra map is 107.51 hectares. As per letter of intent issued by the State government, the intended mining lease area is 90 hectares. Further there is specific area in LOI. Thus the entire area shown in various plans and sections required through review. Further no forest land is mentioned in LOI whereas it is given in mining plan. Such contradictory facts submitted by the applicant is not tenable.
2. On perusal of office records, the PL area was granted in favour of Asian Cement Company whereas mining plan is submitted by the applicant ' Asian Concretes & Cements Pvt. Ltd. In case Asian Cement Company & Asian Concrete & Cements Private Ltd Company are the same company, then authentic proof in this regard is to be submitted.
3. Name of the applicant is not matching as per letter of intent issued by state government dated 27.03.2017.
4. As per provisions of MMDR Act, 1957, as amended upto date, the fresh grant of mineral concession and applicability of MCR 2016 is only in accordance with section 10A of MMDR Act 1957, whereas this aspect is not explicitly evident from Letter of Intent enclosed with the submitted MP. Copy of letter written to the State government from this office in this regard is also enclosed, which is self-explanatory. Thus the submitted document is not found in line with Section 10A of the MMDR Act 1957.
5. Precise area demarcation report and 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 configuration given in the lease plan.
6. On cover page Dewra Limestone mine is indicated. The lease has yet not been executed. It is an intended ML area not a mine.
7. Board resolution in favour of authorized person representing the company shall be from the company secretary of that company, which is not given.
8. The information provided at d & e of General Chapter at page 7 is not correct.
9. QP should enclose their experience certificates as per MCR 2016.
10. On cover page QP are different whereas in the text at page 7 only one name is given i.e. a consulting company.
11. The khasra detail at annexure-12 is not authenticated by revenue authority.
12. Details of the forest land within the intended area is given at page 8 in the text, whereas on cover page forest land is not shown.

13. On page 8 in the last para it is indicated that ' commencement of mining operations by ECL'. This is incorrect and may be clarified/ rectified.
14. On page 12 of the text the grid interval of boreholes is indicated as 250x250m whereas on page 19 the grid interval is indicated as 250x300m. The same may be explained. The text is commentary of plans and sections and should be synchronized/ matched.
15. On page 21 of the text the entire area is under G-2 and G-3 axis of UNFC whereas no proposals are given in Ist year to bring the area in G-1axis. Thus future exploration proposals need to be reviewed.
16. On page 37 the resources are indicated. These are conflicting figures w.r.t. R&R at page 33.
17. On page 41 the gradient is indicated as 1:16 whereas, in plan it is shown as 1:10. Calculation is thus seems contrary. Similarly forest area impact on UPL is not discussed
18. As per Minerals (Evidence of Mineral Content) rules 2015, for G-2 stage, the grid spacing of boreholes should be 400m or closer for regular habit and 200m or closer for irregular habit. Whether the deposit is of regular habit or irregular. This needs to be specifically mentioned.
19. Exploration proposals are not incorporated as per rule 12 of MCDR 2017.
20. Area brought under G-2 & G-3 has not been indicated on page 37 of the text. This has also been clarified in the field.
21. Reserves blocked under various factors are not given as per guidelines.
22. The proposed area for excavation is very close to habitat and at eastern portion habitat is on slope side thus special precautions needs to be taken. The proposal is devoid of such special attention.
23. On page 42 excavation figures are shown. It should be in tonnes also. Specific gravity should be assessed from NABL accredited lab. Similarly basis of bulk density is not given.
24. Precautions to be taken in blasting in order to control ground vibration is to be discussed explicitly and not in general and vague terms.
25. On page 47 specification of drilling machines are given. Very theoretical calculation are carried out. Availability and utilization needs to be discussed.
26. On page 57 area to be disturbed by mining is given. Such area is out of which type of land viz. private land, Govt. land or forest land, needs to explained/ detailed out in tabulated format.
27. PL was granted for limestone & Shale, whereas LOI for intended area is for mineral limestone only. No narrations justifying this aspect has been given.
28. On page 71 consumption of mineral for captive purpose is indicated. Please substantiate/confirm this statement.
29. Approach road is proposed during the first year. Production is not proposed owing to construction of road nor has the same been clarified.

30. Consent letter from applicant is without date.
31. Cutoff grade, ultimate pit depth has not been mentioned as per guide lines under heading mineral reserves/resources.
32. Similarly mineral blocked under 7.5m barrier, pillars, roads, nala etc has not been indicated as per guidelines.
33. Blasting parameters and pattern have not been dealt adequately.
34. 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. On page 88 human settlement is discussed. Adequate safety distance from blasting point of view should be left and accordingly R&R to be calculated.
35. All the proposals should be made within the intended ML only.
36. On page 91 land likely to degraded is indicated. Please give a table that how much of the area will be degraded for mining purposes w.r.t. table at page 79, land use i.e. among that type of land how much will be put to use for mining.
37. Very vague term has been given as proper design at page 94. Please specify this proper design parameters.
38. Yearwise proposals have been indicated in the table 8.3.5 of PMCP but the same has not been marked on the reclamation plan.
39. Similarly plantation proposals are given but the same has not been quantified. Area to be brought under plantation is also not indicated nor plotted on reclamation plan.
40. Green belt is also considered under financial assurance area calculation. This is to be excluded as per guidelines. Due to above scrutiny points financial assurance need to be reviewed and shall be calculated as per MCDR 2017
41. There are several typographical mistakes which require to be corrected.
42. All the annexures should be attested by qualified persons for their authenticity.
43. 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. KML file shall also be submitted alongwith final submission.
44. Air, water, vibration monitoring and its stations are not proposed nor shown in Reclamation P /Environment Plan. Occupational health aspects w.r.t. Silicosis, Free silica analysis of rock sample proposed under excavation is to be made.
45. On page 84 it is indicated that ambient air quality is done. The period of study is not indicated.

Plates

46. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the Intended ML area.
47. Intended area is not connected with three ground control points as evident from surface plan. Thus precise demarcation report is essential from concerned State government authorities.
48. Surface Plan(SP), Surface Geological Plan(SGP), Environment Plan(EP)- surface features are not shown as per actual ground condition, similarly is with SGP and EP. All these plans are not as per provisions indicated in MCDR 2017.
49. Exploration proposal are not marked on SGP.
50. Level of exploration G-1 to G-3 on G-axis as per UNFC is not shown on SGP.
51. Conceptual plan has got the impact on calculation of R&R and thus it is to be drawn carefully & should be implementable.
52. Financial assurance plan is not prepared as per guidelines.
53. UPL as marked on surface geological plan requires review in view of habitat in eastern, western portion of the intended ML area.
54. Surface plan- latitude, longitude, coordinates are not matching with that given in text.
55. Surface geological plan- Boreholes are given in forest area. Extant provisions of rules/ guidelines shall be followed for execution/ making such proposals.
56. Lease plan/ cadastral plan is not showing ground control points as well as DGPS/ GPS readings of lease corner points/ points.
57. Cadastral plan should be prepared on the scale on which it is actually prepared by revenue authorities of the State government. Neither it should be reduced nor enlarged.
58. Gradient 1 in 10 will not be considered until approved by DGMS or the competent authority. Also the plan, bench configuration and access of haulage road shall be as per 1 in 16 prescribed guidelines MMR 1961. Thus all calculations need review.
59. Conceptual plan- at places some theoretical proposals are given where benches are not properly merging with topography. Thus a review is required.
60. Surface plan- coördinates are not matching with the coordinates mentioned in the text.
61. Environment plan should depict the present status and no future excavation is shown. It should be the position as on date. Adequate details are not given beyond intended area as per provision of rule for EP in MCDR 2017. Direction of flow not shown. Water channels not shown.
62. Adequate Safety distance has not been observed while making excavation proposals near the water stream.