



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/276/20-DDN

देहरादून, दिनांक 20-08-2020

सेवा में/ To : डॉ। पुनीत निगम Dr. Puneet Nigam,
होलटेक कंसल्टिंग प्राइवेट लिमिटेड Holtec Consulting Private Limited,
होलटेक सेंटर HOLTEC Centre,
A Block, सुशांत लोक Sushnat Lok,
गुरुग्राम, हरियाणा-122001 Gurgaon, Haryana-122001

e-mail:pn@holtecnecnet.com

विषय/Sub: Submission of Mining Plan with Progressive Mine Closure Plan in respect of Karyali Limestone Area by an applicant M/s Dalmia Cement (Bharat) Ltd, for a mining lease over an area of 798.5754 Hectares located at near Villages Karyali, Kothi, Malgi, Jungle Malgi, Newal, Dhrogra, Jungle Mandal, Banuna, Jungle Saini, Bathora, Sal, Narar, Pandoa, Drawl, Graon, DPF Drabla, Khun, Himri, Drabla, Gadau, Suma, Tharu, Mateyog, Sainj, Tehsil Sunni, District Shimla of Himachal Pradesh, submitted under Rule 16(1) of Minerals (Other than Atomic and Hydro Carbons Energy Minerals) Concession Rule, 2016 & Rule 23 of Mineral Conservation and Development Rules-2017

संदर्भ/Ref.: Letter from applicant of the mining lease Applicant No.1817 dated 21.05.2020 received on dated 26.05.2020

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned initial/draft Mining Plan including Progressive Mine Closure Plan, hereinafter refer as MP, on 26.05.2020. The same has been examined and found incomplete and incorrect. Various discrepancies/deficiencies/in-consistencies/gaps were observed which has been listed in enclosure to this letter as **scrutiny comments**. One copy of MP has been forwarded to the State DMG, in case receipt of any comments from them the same shall be communicated to you subsequently.

The area couldn't be inspected due to COVID19 protocols of the state, also the adverse weather conditions and very remote location of the site which you are well aware through correspondences endorsed time to time. In case the site is inspected and new points emerged then same shall be communicated to you which shall become the integral part of the attached scrutiny comments.

You are advised to correct the submitted initial/draft MP by addressing the discrepancies/deficiencies appropriately and carry out necessary/required modifications and submit the mining plan afresh in **3 fair copies** within **15 days** from the date of issue of this letter in hard bound copies (no spiral binding) along with checklist (changes made scrutiny point wise). Also submit two CDs containing entire MP i.e. text, plates, annexures, cover letter of final submission and checklist etc. In case if any other changes made in the MP other than scrutiny comments, the details and reason/justification for doing so shall be given along with page numbers/plate no/annexure no. etc. You are advised to prepare the fair copies carefully and ensure that it is correct in all respect and submitted to this office within stipulated time. It is also advised to use both side paper to best possible extent, also optimize the use of drawing paper used in plates.

If the afresh/fair copies of Mining Plan including Progressive Mine Closure Plan not received at this office within stipulated time then final action will be taken appropriately. Further 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,

20.08.2020

(दामोदर प्रसाद शर्मा / D. P. Sharma)

सहायक खान नियंत्रक /Assistant Controller of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुरा (zo.udaipur@ibm.gov.in)
- 2- M/s Dalmia Cement (Bharat) Limited, 11th & 12th Floor, Hansalaya, 15, Barakhamba Road, District- New Delhi, State-Delhi, 110001 (v.karthikeyan@dalmiacement.com)

20.08.2020
सहायक खान नियंत्रक /Assistant Controller of Mines

Scrutiny comments, indicating incomplete details/ information/ inconsistencies/ deficiencies etc., in initially submitted Mining Plan with Progressive Mine Closure Plan (MP) including supporting documents of Karyali limestone area of M/s Dalmia Cement (Bharat) Ltd over an area of 798.5754 Ha located near villages Kothi, Malgi, Jungle Malgi, Pandoa, Karyali, Drawl, Graon, DPF Drabla, Khun, Himri, Drabla, Gadau, Suma, Tharu, Mateyog and Sainj Tehsil-Sunni, District-Shimla of HP State submitted under Rule 16(1) of M(OAHCEM)CR 2016 & 23 of MCDR 2017.

1. As per provisions of MM(D&R) Act, 1957, as amended upto date, the fresh grant of mineral concession and applicability of M(OAHCEM)CR 2016 is only in accordance with section 10A(2)(b) of MMDR Act 1957, whereas this aspect is not explicitly evident from Letter of Intent vide letter no: Udyog-Bhu(Khani-4) Major-337/2013-8013 dated 21-12-2019 enclosed with the submitted MP.
2. Precise area demarcation report of Prospecting License (PL) area and Authentic PL area plan duly verified by Geology & Mining department of State Government (DMG herein after) with DGPS coordinates of boundary pillars has not been enclosed. This is essential for the geo referenced spatial location of the PL area.
3. In LOI of Letter No. Udyog-Bhu(Khani-4)Major-337/2013-8013, dated 21-12-2019 as submitted in Annexure-01, as per condition No.01 in LOI, Precise demarcation report with DGPS coordinates of Mining lease boundary pillars authenticated by DMG is not enclosed.
4. DMG Authenticated Lease plan with DGPS coordinates is not enclosed. It shall be the basis for the preparation of all plans and sections. It is to be noted that devoid of authentic ML plan, it cannot be acknowledged/assumed with respect to configuration for remaining submitted plans and sections.
5. On Page No. 14, as per Prospecting license grant order vide no: Udyog-Bhu (Khani-4)Major-224/08-5603-07 dated 12-09-2008, the given Toposheet numbers 53- F/3, 53-F/4, 53-F/7, 53-F/8 found mismatched with the Toposheet numbers prescribed in MP.
6. PL area is not matching with PL grant area with the given boundary pillar coordinates submitted in geological exploration report of PL area and subsequently it is also evidenced that proposed ML configuration goes beyond PL limits.
7. PL was granted for mineral limestone, Shale & Quarzite. Subsequently LOI was granted for limestone & Shale. However, limestone only is given in submitted MP. Such inconsistencies among grant of mineral concession (PL), its report (as enclosed) and the mining plan submitted w.r.t. the LOI is observed.
8. Khasra plan showing both PL and ML boundary (plate no.2) is not legible.
9. Permission letter from Forest department to carry out drilling operation for exploration in forest area is not enclosed.
10. Cover Page:
 - a. Name of Mine is mentioned as Karyali Limestone mine which is wrong as mining lease yet not granted. It is still a free hold area not a lease/mine.
 - b. Mentioned name of rule is incorrect
 - c. Address and contact details of qualified person shall be incorporated.
11. On page No.10, The Status of Applicant is not lessee, therefore details given at S.No 2.1 is incomplete and incorrect.
12. On Page No.13, Para 3.9, It is given that no national park/ reserved forest/Sanctuary/falls within 10km of radius of applied ML but NOC from competent authority shall be enclosed as it is a Fresh Grant case.
13. On Page No. 14 to 18, it is also found that the area in ha calculated by given DGPS boundary pillar coordinates are not matching with applied area. Its shape also not found same.
14. On Page No.33, Para 6.5.4, Expenditure incurred for exploration is given but details like agency etc are not given. Supporting documents in this regard be annexed.
15. Certificate for Bulk density by NABL accredited shall be incorporated.
16. On Page No.45, Table 2.15, Total resources estimation in quantity of limestone (million tonnes) under G3 category is mismatched with exploration report of Annexure 20 on page no.355
17. Only one bore hole falls along with in section A-A' which is contradictory in calculating the reserves and resources whereas that bore holes has not lying under the influence line for the estimation of Reserves and resource.

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18. On Page No.45, Allowances in resource estimation 30% and 40% are mentioned arbitrarily for G2 and G3 axis, as no scientific stipulations have been made for considering such factor/allowance and elsewhere. This will affect the Reserves and Resources.
19. On Page No.53, Ramps are proposed steeper than 1 in 16 gradient. Any gradient steeper than 1 in 16 shall be proposed only after obtaining competent approval.
20. On Page No.54, Pit design parameters, especially bench width, Haul road width is not in synchronization with proposed HEMM like haulage, excavation equipment etc.
21. Being the mining operations, mine benches are proposed to be facing towards habitat, public road, river side and the topography in general indicates open slope towards such structures/features, as such concrete proposals are not evident. Following proposals/aspects need to be addressed appropriately;
 - a. Bench face angle shall be kept lesser than 80° , preferably 75 degrees till any scientific study is carried out. May note that once excavation on top benches, close to UPL, commenced with steeper angle is done then it might not be feasible to reduce it to safer angle. Thus proposal for face angle 85° is not tenable at this stage.
 - b. Possibility of orientation of face which is presently facing the habitation area may be reviewed from safety point of view, like, fall of fly-rocks/boulders/landslides etc.
 - c. Adequate special precautionary measures on the aspect of drilling, blasting like safety distance from blasting point of view should be left, roll down of debris/material during excavation and finally R&R may be calculated.
 - d. Concept/provision of arrestor bench, i.e. bench with substantial width in between shall be made in order to arrest such roll down/dislodgement from top benches
22. On Page No.55, Excavation quantity of only limestone is proposed for the plan period. In view of given lithology/bore hole logs etc., mining/excavation without any other mineral/waste (shale/inter burden, sub grade mineral etc.) is not appearing justified. After due scientific re-assessment, excavation based on lithology shall be given in this mining chapter, year-wise.
23. On Pages 55-60, the year-wise quantity shall be given in tonnage and not in million tonnes.
24. On Page No. 56, it is proposed that area to be broken up for first two years will be 6.23 ha but nowhere the excavated quantity, type of mineral excavated and its handling has been mentioned/given/ which would be taken out from that much of broken up area.
25. ON Page No. 71, Para 7.21, in conceptual plan when the mine is going to achieve the rated production and full rated production is not given explicitly.
26. On Page No-74, Table No-3.4,
 - a) Land use pattern existing, at the end of plan period and at conceptual stage is not matching with each other.
 - b) Area of greenbelt, Afforestation/plantation for reclamation of broken up area shall be proposed and accounted separately.
27. On Page No. 77, review the excavation quantity of waste/interburden/other mineral reject sub grade generation etc. during 1st to Vth yr (also refer Para 24)
28. Rainwater harvesting proposals are not made. Review the source of water for utilities for the project, which shall be subject to competent approval and it should be explicitly mentioned.
29. On Page No. 84, Deployment of Mining engineer as per MCDR, 2017 is not mentioned
30. On Page No. 85, provision of rule is not mentioned in Progressive mine closure plan chapter.
31. On Page No. 85, PMCP land use pattern as per revenue details like Forest, Gochar (pasture), and Agriculture land etc is missing. It shall also be given as an abstract of type of land.
32. On Page No. 88, Ground water station location in coordinates for GW5 to GW8 to be given. Not mentioned at Page 87.
33. On Page No. 90, Ambient Air quality w.r.t PM_{10} , $PM_{2.5}$ monitoring is not given separately.
34. On Page No. 91, Mineralogical analysis for PM_{10} , $PM_{2.5}$ as mentioned is not given
35. On page No. 95, notwithstanding of human settlement/villages within applied mining lease area, no proposals for resettlement and adequate rehabilitation is discussed, moreover proposed area for excavation for first five years plan period is in close vicinity to habitat.
36. Various public roads are passing through the lease area in connecting various villages. This issue has also not addressed in the plan (PMCP) and no action for diversion/ competent approval is evident

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37. On Page No.102, Proposal for regular monitoring of ground vibration / Air Over Pressure (AOP) due to blasting is not given in mining plan being the area eco-sensitive zone. Every blast shall be monitored for ground vibration and AOP
38. On Page No.104, Para 14.3.1, Waste/sub-grade storage is indicated in year-wise development plan(plates) whereas nil is shown in this Para therefore this information is contradictory.
39. On Page No.105, the information/details regarding developing green belt, afforestation on virgin land, afforestation on worked out area i.e. reclamation of mined out area shall be given separately.
40. Provision of arrestor bench in conceptual plan to be given, where some mitigative measures can be taken to arrest the roll down material/boulders, mine waste etc.
41. Refer Para 14.3.7 and 14.3.10, no provision has been kept for the monitoring of induced ground vibration, Air over pressure due to blasting.
42. Initial Development of green belt preferably towards prominent wind direction is to be proposed, which is not evident.
43. All the proposals should be made within the ML only.
44. It is to be confirmed that any religious place, religious place of local sentiments is covered under mining area or not.
45. The applied area 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.
46. 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 along with final submission.
47. Draft Mining Plan has not been prepared as per guidelines.

Plates

48. 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. Whereas submitted Composite Khasra Plan is not legible and coordinates also not marked on it.
49. Certification on the plates is incomplete and incorrect. The applicant who is at present not lessee to this area is submitting the document. Certificate to the effect that plans and section is prepared based on lease map authenticated by State Govt. is not given.
50. Date of survey on none of the plan is given. Signature is undated.
51. On Plate No.02, Composite Khasra Map of applied ML is neither as per revenue scale nor legible.
52. Surface plan, Plate Nos.03a-03e:
 - a. Coordinates shall be shown at boundary pillars, Capacity of High Tension line shall be provided.
 - b. One of the lease boundary pillars shall be connected with three ground control points which is not given.
 - c. Surface plan is incomplete as the various types of land/land use pattern like pasture land/private agriculture land/Govt. land/ forest land is given. These land use is evident from khasra details given in Annexure 14.
53. Surface Geological Plans, Plate Nos.04a-04e:
 - a. Ultimate pit limit is demarcated which is mandatory as per provision. Proposed Borehole coordinates shall be provided in mentioned plans.
 - b. Overburden soil is shown in Surface Geological plan which is not discussed in text. It is shown In index
 - c. Area covered under various geological axes as G-1 to G-4 is not marked on Surface Geological Plans.
 - d. On Plate No.04g, mineral wise, Section B-B' is not matched with plate No.04(b)
 - e. Bore-hole representation in geological sections is not as per projected/ standard format like continuous lines are depicted to show the influence of bore hole not falling on the section line. Locations are also not matched with provided sections in plate No.04g.
 - f. Dip of bore holes is not matching with the bore hole log details given in Annexure.

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54. Mine development and production plans, Plate Nos.05a-05e:
- Ultimate pit limit is not shown. Same color is provided for every year of working plan which shall be varied. Lease corner pillar nomenclature and co-ordinates are not given on these plans.
 - Sections depicting year-wise (all years together) excavation proposals shall be superimposed on geological sections only. No new arbitrary section to be given
 - Benches are shown in second year plan but quantity is nowhere reflected either in text or feasible studies.
 - Approach haulage road to reach 1780 mRL is not evident during proposals
 - No haulage roads/access to benches is shown either on year-wise development plan or on conceptual plan. Haulage roads / route planning is essential at this stage because there might be the possibility that the space required to accommodate haulage routes for long term may be got excavated.
 - Appropriate development proposals to protect of run-off from mine towards river/ rivulet are not given.
55. On Plate No.07a-07b, of Reclamation Plans, year wise plantation proposal are not clearly shown and year shall be mentioned in demarcated area. Ultimate pit limit also not demarcated. Reclamation plan shall be legible and only relevant part along with key plan and prompt wind direction shall be given. In general, plantation proposals on virgin land shall be beyond UPL
56. Conceptual plan:
- On Plate No.08a, Conceptual plan is not legible. Moreover, plan demarcation is mismatched as per provided index.
 - On Plate No.08a, Conceptual plan- Pit design parameters are not evident (H/W/slope). This will affect R&R component.
 - No Haulage road at mine face/ year-wise development plan vis year-wise excavation proposal are not shown. No Haulage road is given in conceptual plan and the proposals are practically to be feasible.
57. On Plate No.09, Provided Environmental plan is not prepared to scale which is a statutory plan. It shall be provided in 1:5000 scale
58. On Plate No.10, Submitted Financial Assurance plan is not correct. As proposed, put to use area shall be demarcated in FA Plan which is not evident. Contours shall not be required
59. Except Environmental Plan, all other plans & sections should be restricted to mine lease area only. No proposal should be made outside the ML area.
60. The proposal in the PMCP proposals should be clear cut and to be marked in reclamation plan, environment plan and surface plan separately.

Annexure

- Complete details of Initial PL deed are not enclosed at Annexure 3
- Board of directors' details at annexure 10 is undated
- Experience certificate is undated, The Rule under which RQP certificate is not inexistence
- Pre-feasibility study,
 - W.r.t hilly terrain need to be reviewed
 - Criteria for selecting the proposed ML area out of PL area are not indicated. Ex.2,08,45,000, R&R
 - Modifying factors are not complete like supporting documents that the grade is suitable for cement manufacturing is not enclosed.
- At various BH log sheet, assay values are not given
- On page No. 179, Land summary at annexure 14 is not correct (unit/value is incorrect). Further, Forest land, pasture land, agriculture land are evident in various village wise details.

--End of Scrutiny Report--

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