



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)/MS-B-53/98-DDN

देहरादून, दिनांक 02-09-2020

सेवा में/ To : श्री पंकाज पाण्डे, Shri Pankaj Pande,

e-mail:sahajsahyog990@gmail.com

मैसर्स सहज सहयोग कंसल्टेंट प्राइवेट लिमिटेड, M/s Sahaj Sahyog
Consultants (P) Ltd, B-1/21, Sec.-B,

अलीगंज, लखनऊ – यू।पी। Aliganj, Lucknow-U.P

विषय/Sub : Submission of Review and Updation of Mining Plan with Progressive Mine Closure Plan in respect of Dundu Magnesite Mine by M/s N.B Minerals Corporation, for a mining lease over an area of 4.241 Hectares located at near Village-Dundu, Tehsil-Didihat, District-Pithoragarh of Uttarakhand, submitted under Rule 17(2) 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 Mining lease holder vide No.Nil dated 13.06.2020 received this office dated 25.06.2020

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned initial/draft Review and Updation of Mining Plan including Progressive Mine Closure Plan, hereinafter refer as RMP, on 25.06.2020. 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 RMP 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. 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.

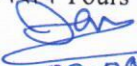
You are advised to correct the submitted initial/draft RMP by addressing the discrepancies/deficiencies appropriately and carry out necessary/required modifications and submit the mining plan afresh in **3 fair copies** within **15 days** from the date of issue of this letter in hard bound copies (no spiral binding) along with checklist (changes made scrutiny point wise). Also submit two CDs containing entire RMP i.e. text, plates, annexures, cover letter of final submission and checklist etc. In case if any other changes made in the RMP 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 Review and Updation 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,



02-09-2020

(दामोदर प्रसाद शर्मा / D. P. Sharma)

सहायक खान नियंत्रक /Assistant Controller of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

- 1- खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर (zo.udaipur@ibm.gov.in)
- 2- M/s N.B Minerals Corporation, Newaran Nagar, Parashar Niwas, Nawabi Road, Haldwani, District-Nainital, U.K-263139 (nbmineralscorporation@rediffmail.com)


सहायक खान नियंत्रक /Assistant Controller of Mines

Scrutiny comments, indicating incomplete details /information/inconsistencies / deficiencies etc in submitted Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Dundu Magnesite Mine, M/s N.B Minerals Corporation Mining lease over an area of 4.241 hectares located near Village-Dundu, Tehsil-Didihat, District-Pithoragarh, Uttarakhand State submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2020-21 to 2024-25.

- 1) Valid Mining Lease deed is not found annexed in submitted Review of Mining Plan.
- 2) Cover page:
 - a. Validity of lease period is incorrect.
 - b. Address of the Mining lease holder is incorrect as per previous lease deed submitted in approved Scheme of mining.
 - c. Address and Contact details of qualified person shall be incorporated
- 3) Review and Updation of Mining Plan with PMCP shall be submitted under rule 17(2) of Minerals (Other Than Atomic and Hydro-Carbons Energy Minerals) concession rule 2016 but on cover page and elsewhere rule 17(1) is mentioned, which is incorrect.
- 4) Lease Co-ordinates are not matching with the co-ordinates mentioned in previously approved Scheme of Mining (hereafter referred as SOM).
- 5) On page No.01 and 03, validity of mining lease period is incorrect. In Introduction, Location and accessibility Para, it is mentioned that lease period extended for fifty years i.e. upto 8th July 2030 as per provided annexure no.4. After examining annexure no.04, nowhere it is pointed out that lease is extended upto mentioned above date.
- 6) On page No. 06, Para 3.3 table, No efforts has been made for exploration and the compliance position for Exploration is not justified properly. Exploration must be carried out as per approved Mining plan/SOM. Compliance position of Exploitation, year wise Mine development, Reclamation/Rehabilitation and afforestation is not substantiated as per provision of rules. Besides extent of Mining including dumping of waste material etc. is seen outside mining lease area near Pillar F.
- 7) On page No.08, on disposal of waste Para, it is mentioned that quantities were dumped outside lease area, whereas it is evident from proposals in previous approved SOM and during field inspection that no dumping shall be carried outside the lease area, quantity and area to be given for outside Mining lease. This is not as per lease deed condition.
- 8) On page no.08, Para 3.5, it is indicated that no suspension/closure/prohibitory order has been issued by any Government agency under any rule or court of law. Whereas, while reviewing of records, it is observed that Mining operations were suspended by District Magistrate wherein details are not incorporated.
- 9) On Page No. 12, Para I, Exploration proposals are not provided as per Rule 12 of MCDR, 2017. The holder of a mining lease shall carry out detailed exploration (G1 level) over the entire potentially mineralized area under the mining lease. However, as an existing mining lease, Lessee couldn't carry out G1 level exploration as proposed in SOM.
- 10) On Page No. 14, Certificate for Bulk Density by NABL accredited shall be incorporated.
- 11) On Page No. 15 and 20, it is evident that during updation of Total Reserves and Resources they are abnormally reduced without any proper justification/ No Exploration carried out and as compared



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- with previous approved SOM which has to be justified properly. Review estimation of reserve and resources. When lease has magnesite, soapstone, dolomite why only magnesite is proposed?
- 12) On Page No. 21, in chapter mining, Ramps are proposed steeper than 1 in 16 i.e. 1 in 10 to 1 in 14. Any gradient steeper than 1 in 16 shall be proposed only after obtaining competent approval.
 - 13) On Page No. 21, pit design parameters, especially bench width, haul road with, face angle and overall pit slope is not synchronized with proposed HEMM. The overall pit slope is not realistic w.r.t design parameters.
 - 14) On Page No. 21, in method of mining Para, it is mentioned that recovery of magnesite is 90% and 10% is waste. It has to be described in scientific manner not as a thumb rule, give the specification of waste.
 - 15) On Page No. 22, in year-wise activities table, give the design of retaining wall separately with all proper engineering parameters.
 - 16) On Page No. 22, in table of In-situ Tentative Excavation, during plan period, proposed production of ROM of magnesite is exceeded with total a mineable reserve which is not correct.
 - 17) On Page Nos. 25 & 26, Under Drilling & Blasting, it is mentioned that under consideration of Human settlements along with public road is located at less than 50m from the ML, control blasting plan has to be incorporated for safety reasons. However, as mentioned that proposals for type of explosives are not suitable for control blasting/muffle and there is a more chance of ejection of fly rock. Thus you are permitted only rock breaker / muffle blasting as per given annexure Nos. 5 & 6. Therefore proposals for type of explosives, procedure of control blasting shall be reviewed in accordance with annexure no 5 & 6.
 - 18) On Page No. 27, Para 4.4, it is mentioned that waste to be generated during first three shall be dumped towards western flank where the location is not properly defined. Scientifically Waste dump Management shall be given.
 - 19) On Page No. 30, Para d, it is mentioned that rain water shall channelize through the slopes & gullies and meet the natural drainage whereas it is to explained in detail with demarcation in separate plan showing drainage pattern from in and around lease area within 60m beyond lease area.(only drainage & contours).
 - 20) On Page No. 31, Para a, year-wise quantity of waste generation is very uniformly given without any scientific evidence
 - 21) On Page No. 32, it is mentioned that from fourth and fifth years the waste to be generated shall be used for purpose of backfilling whereas it has to be proved of non existence of mineral. This proposal is in violation of Rule 14 of MCDR 2017.
 - 22) On Page No. 33, Chapter No 5, Para a, in details of end-use, specifically one party has been given whereas all end user details shall be given.
 - 23) On Page No. 33, Chapter No 5, under Para of use of mineral and mineral rejects, it has to be clarified pin pointedly whether the use of mineral (magnesite) is captive or non-captive purpose.
 - 24) On Page No. 34, Para 6(g), proposals shall be given for water consumption at mine such as drinking, plantation and dust suppression on daily basis as a prominent requirement while preparing PMCP report.
 - 25) In PMCP chapter, proposals on details regarding development of green belt, afforestation on undisturbed land and worked out area i.e. reclamation of mined out area shall be adequate and separately given.

- 26) Proposals for provision of arrestor bench at cliff side i.e. between boundary pillars E to G towards north direction shall be given. Adequate mitigative measures shall be proposed to arrest the roll down material/muck/boulders/mine-waste/seepage water into gorge as evidence of natural slope heading towards north direction as per mine topography.
- 27) On Page No. 45, Action of cumulative result on PMCP till date to be given. Give the execution of earlier proposals so far separately.
- 28) On Page No. 47, Financial Assurance per ha is shown wrong and quoted that under 23(F) of amended rule of MCDR 2017, and also stated that the minimum amount as a financial assurance will be Rs. Two lakhs is incorrect.
- 29) In Consent letter, provision of rule for submission is written wrong.
- 30) Under reclamation & rehabilitation, it has to be mentioned that anticipated survival rate of saplings shall be envisioned and contribution towards rehabilitation.
- 31) As it has been an existing working mine, drinking water potable test reports, Ambient Air Quality, noise level test reports which are incorporated as an annexure have not been updated.
- 32) Ground vibration Measurement report isn't enclosed.
- 33) No. of working days are considered as 300 days which appears to be on high in view of rainy season especially.
- 34) The sufficient number of colored photographs of the area showing existing status of the lease area, benches, boundary pillars, mines office, etc may be submitted with proper captions.
- 35) As per summary of year-wise proposals table, Dump re-handling for back-filling purpose, fourth year and fifth year proposal were given but nowhere described in the waste Dump Management. However, it is foreseen in year wise working plans (plate Nos. 9 & 10) which has to be clarified.
- 36) All the proposals should be made within ML only.
- 37) Review of Mining Plan has not been prepared as per guidelines.

Plates:

- 38) 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.
- 39) Certificate to the effect that plans and sections is prepared based on lease map authenticated by State Govt. on all submitted plates is not incorporated.
- 40) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
- 41) Plate No.1, Location plan is incorrect and not up to dated. Mining lease is not shown nowhere in location plan
- 42) Plate No. 2, Scale of key plan is not mentioned.
- 43) Surface Plan, Plate No.3:
 - a. All existing surface features are not shown in provided Surface Plan.
 - b. Nowhere three Ground Control points are not demarcated in the Surface Plan
 - c. As per text, there is no magazine lied in mining lease area whereas in the provided surface plan it is demarcated within the mining lease.
 - d. Statutory boundary is not marked along the mining lease boundary pillars A-B-C. MMR Conventions are not used for preparation of surface plan.


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- 44) Surface Geological Plan, Plate No.4:
- Existing dump location is not shown in Surface Geological Plan.
 - Borehole coordinates shall be provided in mentioned plan.
 - Contours are not properly demarcated which is base for calculating the sections in Surface Geological Plan.
 - Trenches/pits for exploration wherein described in the text is not demarcated in Surface Geological Plan.
 - Dolomite, soapstone and magnesite are not shown.
- 45) Sections for Surface Geological Plan, Plate No. 5:
- Sections for Surface Geological Plan are incorrect and mismatched with respect to contours and features with Surface Geological Plan (Plate No.4).
 - No mineralization, Inter-burden, waste is shown in sections. Sections are devised to conceptual/UPL benching to assess mineable reserves
 - Section 10-10', 11-11', 12-12' are technically wrong
- 46) Plate No. 6-10, Haul road is not demarcated and indexed.
- 47) Conceptual plan, Plate No. 11:
- Conceptual Sections do not match with Conceptual Plan
 - Conceptual Plan is not correct; access route from surface ground level upto the pit bottom is not given.
 - No haulage road is given in conceptual plan and the proposals are practically to be feasible.
- 48) Plate No.13, Environment Plan is not as per Rule 32(5)(b) of MCDR 2017, important features i.e. outside mining lease area especially just adjacent to ML area are not shown.
- 49) Plate No. 14, Financial Assurance plan is incorrect, existing broken up area and additional broken up area have not been depicted in the plan.
- 50) Plate No. 14, Area put to use shall be recalculated and all the area in put to use is not covered, accordingly FA be calculated afresh.
- 51) What is meant by exploration pit as shown in various Plans & Sections?
- 52) You have to incorporate all such measures/provisions, directives of Hon'ble NGT in OA No.995 of 2016.
- 53) Material, muck etc. are found spread into the outside mining lease in natural environment and all adequate measures to trap all rolling material shall be taken in First year of study & robust design.
- 54) Elevation of Highest and lowest mRLs are mismatched with previous SOM.
- 55) From third year mine development plate to conceptual plan, provided Index is not matched with demarcations, especially in contradiction to conclude the demarcation of proposed boreholes.
- 56) In all the plates, the mine name is written as Dundu Magnesite, Soapstone & Dolomite Mine but as per text provided it is mentioned only Dundu Magnesite Mine which has to be clarified.

General:

- 57) The mine is located in hill slope of the high altitude mountainous terrain susceptible for seismic, other ground movement and within 50m to PWD road/human settlements. Hence adequate proposals should also be incorporated in the document like controlled blasting techniques, erecting retaining walls, check dams, parapet walls to ensure safe, secure and systematic mining for ensuing years. Proposals shall be incorporated appropriately so that the adjacent environment, flora, fauna, public in villages shall not be affected by roll-down of any boulder/material or any other material etc from mint to outside.

- 58) Document is deviating with guidelines issued by IBM ensuring proper documents for systematic mining proposal for mineral conservation and environment protection.
- 59) All the plates should be attested by qualified person, Surveyor, for their authenticity and shall be self-certified that plans and sections are based on the lease map authenticated by the State Govt.
- 60) All the annexure should be attested by qualified person for their authenticity.
- 61) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 62) There are several typographical mistakes which required to be corrected.
- 63) Two CDs covering the entire document and plans should be enclosed at the time of final submission .Undertaking in this regard by 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.

Note: All the corrections mentioned in the text and plates shall also be attended invariably.


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