



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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देहरादून, दिनांक 04-11-2020

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फाईल संख्या File No: 614(2)/MS-B-75/99-DDN

सेवा में/ To : श्री राकेश पुरोहित,

17E/777, सीएचबी, जोधपुर-08 राजस्थान

विषय/Sub : Submission of Initial/draft Review and Updation of Mining Plan with Progressive Mine Closure Plan in respect of Pamta Limestone Mine by Smt. Savita Chauhan, for a mining lease over an area of 3.100 Hectares located at near Village-Pamta, Tehsil-Paonta Sahib, District-Sirmour of Himachal Pradesh, 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 31.08.2020 received this office dated 07.09.2020

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 07.09.2020. 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.

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,

(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- Shailendra Kumar Soni, J3C-1, Subash Colony, Gali No.-4, Defence Lab road, Jodhpur-11 Raj (soin.sarnar.shailendra@gmail.com)
- 3- Smt. Savita Chauhan, 1766/7, Shamsher Ganj, Naya Bazar, Nahan, District Sirmour(HP) (savitachauhan124@gmail.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 Pamta Limestone Mine of Smt. Savita Chauhan, Mining lease over an area of 3.100 hectares located near Village-Pamta, Tehsil-Paonta Sahib, District-Sirmour, Himachal Pradesh 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) Review and Updation of Mining Plan with PMCP shall be submitted under Minerals (Other Than Atomic and Hydro-Carbons Energy Minerals) concession rule 2016 and should be mining lease instead of working lease. Name of rule to be corrected
- 2) On Page No.06, Lease Co-ordinates are not matching with the co-ordinates mentioned in previously approved Scheme of Mining (hereafter referred as SOM) and also not matching with Annexure-XVI(Authenticated lease map)
- 3) On Page No.08, Under Total area put to use column, as per previous proposals net area was 1.701 ha but nowhere to substantiate the figure given as 1.822 ha in actual work done. Reason for area put to use to be given appropriately.
- 4) On Page No.08, Height of Bench and reason for deviation is not correct from systematic mining point of view
- 5) On Page No.09, in the plantation/afforestation column, proposals has not been carried out and not submitted to this office
- 6) On Page No.09, Para 3.4 though show-cause notice issued status of compliance of violation has not been complied by lessee so far.
- 7) On Page No.11, Part-A, Geology and Exploration chapter, The highest and lowest RL's are not matching with surface plan (Plate No.03)
- 8) On Page No. 15 & 16, Para I, Exploration proposals are not provided as per Rule 12(4) 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 did not carry out G1 level exploration as proposed in SOM.
- 9) On Page No.16, in column mineralization, substantiate the Evidence regarding area extent under mineralized and non-mineralized zone.
- 10) On Page No.18, in depletion of reserves column, actual production provided in page no.8 of said period is mismatched with depletion period thus calculation of reserves as on 01-04-2020 to be reviewed and calculated properly.
- 11) On Page No.18-20, entire estimation of geological reserves and resources is wrong. It is needful to review from mRL, conversion of G1 to 111 and provide proper justification for non-mineable or non-feasible resources which is given under 221. How mineable reserves be worked out? Please give sections at 50m interval in strike direction to give quantity with safe pit slope.
- 12) On Page No. 20, exploration proposals at extreme NE portions of lease is taken as non-mineralized area which shall be proven scientifically for absence of mineral proposal for same be incorporated.
- 13) On Page No. 20, it is evident that during updation of Resources & Reserves they are abnormally reduced without any proper justification/No Exploration was however carried out during last scheme period. Review estimation of reserve and resources appropriately. As per Rule 12(6) of MCDR 2017 the Resources and Reserves shall be updated.
- 14) On Page No.21, mentioned highest and lowest mRL's of existing pit is not matching with surface plan (plate No.03).
- 15) On Page No.22, in Table A2.2 review mineral reject with ROM whether it is 5% or 1% of ROM and give its bases. Preferably technical details to be given.
- 16) On Page No. 21 & 22 dimensions of pit is incomplete and non-scientific. This appears to be a typical case of mining proposal at steep hill slope. Thus extreme care of pit design, layout of pit,



- haulage route to be incorporated with engineering drawings, plans & sections. Every section should also depict the present ground profile.
- 17) Pit configuration with individual bench face angle  $70^{\circ}$  and bench width greater than 6 mt cannot be  $45^{\circ}$ . It will be less but ground profile doesn't permit this parameters. Review entire conceptual plan and accordingly the mineable reserves.
  - 18) On Page No.22, Ultimate pit design is incomplete. All mine/pit parameters given in the text shall be put together viz. Width, Height, ramp gradient, width of haul road, top and bottom mineable levels etc.
  - 19) On Page No.24, Diameter of drilling hole at (ii) is contradictory with drilling and blasting parameters (iii).
  - 20) On Page No.25, in the Para of salient features of mode of working, review point no. 1 with proposals given in development plan for year 2020-21 which is contradictory.
  - 21) On Page No.26, evidencing steep slope, development and plantation proposals for year 2020-21 shall be reviewed on realistic/scientific approach.
  - 22) On Page No.26, for area depicts at table A2.4 and onwards slice plan to be given to validate it.
  - 23) On Page No.26, Haul road and Ramp gradient shall be in line with DGMS norms.
  - 24) On Page No.26-29, development and plantation proposals for all years shall be given on realistic approach.
  - 25) On Page No.29, waste to be handled is given 5% of ROM which is contradictory with tentative excavation year wise proposals.
  - 26) On Page No.30, Drilling parameters (yield, spacing, burden, average rate of drilling) is contradictory with drilling machine i.e. jack hammer.
  - 27) On Page No.32, Table No.A2.10, provided list of machinery is not matching with details given on page No. 23 and 30. Accordingly production/productivity shall be reviewed.
  - 28) On Page No.32, please re-check the HP of air compressor of 175cfm and also capacity of excavator w.r.t model to be also rechecked. Drilling diameter is conflicting with data given elsewhere in the document.
  - 29) On Page No.32, measures to check the roll-down/silt/rain water etc. towards catchment stream are not given. Also a road is passing which is in slope slide of area and extra precautions to be taken. Proposals for same to be given.
  - 30) On Page No.32-34, conceptual mine planning shall be given in detail with all parameters viz. Size and shape of the pit, bench parameters in tabular form.
  - 31) On Page No.36, Chapter No.3, direction of seasonal Nala is not matching with environment plan and not shown in the surface plan.
  - 32) On Page No.38, Para B, No mineral reject is given which is contradictory with production proposals
  - 33) On Page No.38, in Table A4.1, total quantity of mineral reject during the plan period is not correct.
  - 34) On Page No. 47, coordinates for monitoring stations (Air, water, noise) shall be inserted.
  - 35) On Page No.50, plantation proposals are not sufficient for plan period.
  - 36) From Page No. 52-55, ground vibration cost details shall be given in PMCP year wise proposals.
  - 37) On Page No. 64, BG proof shall be incorporated.
  - 38) 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.
  - 39) 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.
  - 40) Action of cumulative result on PMCP till date to be given. Give the execution of earlier proposals so far separately.



- 41) Under reclamation & rehabilitation, anticipated survival rate of saplings to be given and contribution towards rehabilitation to be enumerated.
- 42) As per the Hon'ble Supreme Court of India order dated 08/01/2020, re-grassing of mined out area to be carried out. Accordingly, proposals may be furnished for restoration/reclamation/re-grassing of mined out area.

**Plates:**

- 43) 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.
- 44) 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.
- 45) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
- 46) Plate No.1, Location plan is not submitted
- 47) Surface Plan, Plate No.3:  
a. All existing surface features are not shown in provided Surface Plan viz. existing bench level, profile of pit is missing, description of 3 GCP to be given (what are these permanent structure?).
- 48) Surface Geological Plan, Plate No.4:  
a. Contours are not properly demarcated which is base for calculating the sections in Surface Geological Plan.  
b. Excavation is shown beyond the ultimate pit limit which is incorrect  
c. No exploration proposals given in text but two are demarcated which is contradictory.  
d. color codes shall be appropriately legible
- 49) Sections for Surface Geological Plan, Plate No. 5:  
a. Sections for Surface Geological Plan are incorrect and mismatched with respect to contours and features with Surface Geological Plan (Plate No.4).  
b. Being typical lease disposition additional sections to be given along SW-NE direction at 50m interval.
- 50) Development plans and section, Plate No. 5A-5S,  
a. color shall be codified separately for each year proposals (development, plantation, Parapet wall)  
b. Area under mining during proposed plan period is not matching with demarcated area measured under development plans.  
c. Pit slope appears steep (as the sections are along grid and not across the pit profile).  
d. Additional sections shall be given along SW-NE direction at 50m interval.  
e. Plantation, Parapet wall shall also be demarcated in section  
f. Detrimental to closure activities.
- 51) Environment Plan, Plate No.6:  
a. Environment Plan is not as per Rule 32(5)(b) of MCDR 2017, important features i.e. other mining lease areas/excavations etc. within 500m are not shown.
- 52) Conceptual plan, Plate No. 7:  
a. Conceptual Sections do not match with Conceptual Plan  
b. Excavation is evidenced beyond ultimate pit limit which is not correct.  
c. Existing ground profile shall be given in all sections.



- 53) Reclamation Plan, Plate No.8:
- Ultimate pit limit is not evidenced.
  - Proposed working benches are not matched with development plans.
  - Plantation priority shall be providing towards windward direction.
  - Bio-fencing to be tried sustainable, PMCP proposal
- 54) Plate No.9, Financial Assurance plan is incorrect, additional broken up area which is proposed in development plans is not matching with this plan. Review financial assurance plan w.r.t development plan.
- 55) Plate No.9, Area put to use shall be recalculated and all the area in put to use is not covered, accordingly FA be calculated afresh.
- 56) Elevation of Highest and lowest mRLs are mismatched with previous SOM.

**General:**

- 57) The mine is located in hill slope of the high altitude mountainous terrain susceptible for seismic, other ground movement. 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 mine to outside.
- 58) Proposals for development of pit through proper benching in particular at end of 5 years and also at conceptual stage shall be considered as proper closure activities as leaving steep and extra height benches would be proposals for development of benches during plan period shall be envisioned by keeping in view of PMCP proposals (reclamation/rehabilitation/restoration/afforestation in mined out area)
- 59) 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
- 60) All the proposals should be made within ML only.
- 61) Review of the Mining Plan has not been prepared as per guidelines
- 62) Document is deviating with guidelines issued by IBM ensuring proper documents for systematic mining proposal for mineral conservation and environment protection.
- 63) All the plates should be attested by Surveyor, for their authenticity and shall be self-certified that plans and sections are based on the lease map authenticated by the State Govt.
- 64) All the annexure should be attested by qualified person for their authenticity.
- 65) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 66) There are several typographical mistakes which required to be corrected.
- 67) 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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