



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-56/98-DDN

देहरादून, दिनांक 06/11-2020

सेवा में/ To : श्री राकेश पुरोहित,

e-mail:rkconsultantsjodhpur@gmail.com

17E/777, सीएचबी, जोधपुर-08 राजस्थान

विषय/Sub: 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 Bharli Rudana Limestone Mine, Shri Deepak Chawla, legal heir/son of Late Shri Subash Chand Chawla, Mining lease over an area of 2.623 hectares located near Village-Bharli Rudana, Tehsil-Paonta Sahib, District-Sirmour, Himachal Pradesh State submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017-Reg

संदर्भ/Ref. : Letter from Mining lease holder vide No.Nil dated 12.10.2020 received this office dated 13.10.2020

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 13.10.2020. 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,

06.11.2020

(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- Shailendra Kumar Soni, J3C-1, Subash Colony, Gali No.-4, Defence Lab road, Jodhpur-11 Raj (soin.sarnar.shailendra@gmail.com)
- 3- Shri Deepak Chawla legal heir/ son of Late Shri S.C Chawla, 43-Gandhi Road, Dehradun, Uttarakhand-248001 (chawla_sidh@reddiffmail.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 Bharli Rudana Limestone Mine, Shri Deepak Chawla, legal heir/son of Late Shri Subash Chand Chawla, Mining lease over an area of 2.623 hectares located near Village-Bharli Rudana, 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) There is a variation in lease area (in hectares) of this mining lease as per State Govt. record received to this office. It is to be authenticated and confirmed accordingly.
- 2) Cover page:
 - a. Correct Rule Number under which Review and Updation of Mining Plan with PMCP shall be submitted.
 - b. ML No., if any shall be mentioned beside Mine Name.
- 3) On Page ii, in List of Annexure table, validity of lease is not matching with lease deed
- 4) On Page No.06, reference of the State Govt.'s authenticated document on the lease coordinates shall be given.
- 5) Lease Co-ordinates are not matching with the co-ordinates mentioned in previously approved Scheme of Mining
- 6) On Page No.07-09, reasons for deviations should be appropriately given and reason for bench height given at Page No.09 is not correct.
- 7) On Page No.12, as per field inspection it is evidenced that a PWD road is passing through 1-4 and 2-3 boundary pillars in ML area which should be mentioned.
- 8) On Page No.15, on Table A1.2, chemical analysis for reject is unrealistic this may be reviewed and correct information be given.
- 9) On Page No.16, future exploration proposal should be given appropriately so that it should cover entire lease area.
- 10) On page No.18-20, it is to be explained appropriately that how the Mineable Reserves drastically reduced when compared to previous approved scheme of mining without any exploration.
- 11) On Page No.19-20, Area under 111 and 221 axis shall also be mentioned and Review the estimation of geological Resources under 221. Review mineable reserves and draw surface geological plan and sections accordingly.
- 12) On page No.21, highest and lowest mRL of existed pit is not matching with surface plan.
- 13) On Mining Chapter, dimensions of pit are 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
- 14) On Page No.24, Diameter of drilling hole is contradictory with drilling and blasting parameters.
- 15) On Page No.26, Table A2.4, excavation proposals during 2020-21 is not matching with development plan w.r.t bench height and mRL(level). During 2020-21 proposed excavation quantity shall be appropriate in comparison of further years. Year 2020-21 is almost completed by 8 months so proportionate quantity to be proposed.
- 16) On Page No.26 and 27, Tables A2.4, A2.6 and A2.7, Difference of mRL is not matched with bench height.

- 17) On Page No.26-29, plantation proposals for all years shall be given on realistic approach in considering steep slope at boundary pillars 1-2.
- 18) On Page No.29, in extent of machinery, drilling machinery is not matching with list of machinery given on Table A2.10 and its work-time calculation is contradictory with capacity of drill machines. Drilling parameters (yield, spacing, burden, average rate of drilling) is contradictory with drilling machine i.e. Jack hammer. Accordingly production/productivity shall be reviewed
- 19) On Page No.32, please provide the HP of air compressor of 250cfm and also capacity of excavator w.r.t model to be also rechecked. Drilling diameter is conflicting with data given elsewhere in the document.
- 20) Pit configuration with individual bench face angle 70° and bench width and height of 5 mt cannot be 45° . It will be less but ground profile doesn't permit this parameters. Review entire conceptual plan and accordingly the mineable reserves.
- 21) On Page No.33, Pit optimization excavation shall also be carried out for optimization of conceptual pit profile. 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.
- 22) On Page No.32, measures to check the roll-down/silt/rain water etc. towards catchment stream are not given. Also a PWD road is passing in middle of ML and extra precautions to be taken. Proposals for same to be given. In conceptual plan proposals, PWD road matter is not mentioned whereas proposals shall be given in considering PWD road.
- 23) 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.
- 24) On Page No.36, Chapter No.3, No Seasonal nala is provided in text which is contradictory with environment plan and if it exists in ML it shall be shown in the surface plan.
- 25) On Page No.40, Mining Engineer is not provided as per statutory requirement.
- 26) On Page No.46, plantation proposals are not sufficient for plan period
- 27) 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.
- 28) 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 south direction as per mine topography.
- 29) Adequate Proposals for blast monitoring, dust suppression activities shall be given in consideration of PWD road.
- 30) 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.

Annexure:

- 31) Authentic lease coordinates (DGPS) from State Govt. are not given which is essential for preparation of plates.
- 32) Annexure order is not matching with enclosed annexure and elsewhere in the document.
- 33) Annexure-II, Supplementary lease deed shall be properly enclosed.
- 34) Annexure-VII, shape in Revenue map is not matched with plates.
- 35) Annexure-XI, in feasibility report, Cost of production is not in realistic manner.

Plates:

- 36) 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.
- 37) 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.
- 38) Precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections.
- 39) Key plan, Plate No.2, surrounding leases may be shown.
- 40) 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, 3 GCP including description to be given (permanent structure).
 - b. PWD road passing through ML shall be shown
 - c. Highest and lowest mRL is not shown
- 41) Surface Geological Plan, Plate No.4:
 - a. Excavation is shown beyond the ultimate pit limit near boundary line 1-2 pillars which is incorrect
- 42) Sections for Surface Geological Plan, Plate No. 4S:
 - a. Sections for Surface Geological Plan are incorrect and mismatched with respect to geological axes, AA' to FF' and features with Surface Geological Plan (Plate No.4).
- 43) Development plans and section, Plate No. 5A-5S,
 - a. color shall be codified separately for each year proposals (development, plantation, Parapet wall, retaining wall, check dams)
 - b. development plan doesn't match with text in respect of mRL, bench height
 - c. Plantation, Parapet wall shall also be demarcated in section
 - d. Detrimental to closure activities
- 44) 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, if any excavations etc. within 500m are not shown
 - b. Predominant wind direction is not shown.
- 45) Conceptual plan, Plate No. 7:
 - a. Conceptual Sections do not match with Conceptual Plan w.r.t no. of benches and features
 - b. Excavation is evidenced beyond ultimate pit limit to be explained/reviewed.
 - c. Excavation is shown beyond the ultimate pit limit near boundary line 1-4 pillars which is incorrect and GG' section
 - d. Top to bottom approach route shall be demarcated
 - e. Existing ground profile shall be given in all sections
- 46) Reclamation Plan, Plate No.8:
 - a. Ultimate pit limit is not evidenced.
 - b. Proposed working benches are not matched with development plans. (Note that pit profile will be the part of PMCP. Thus utmost care is to be taken while preparing PMCP proposals in its plan and sections.
 - c. Predominant wind direction is not shown.
 - d. Plantation priority shall be providing towards windward direction.
 - e. Bio-fencing to be tried sustainable, PMCP proposal.
 - f. Height of mineral stack dump and reject dumps are not shown.

General:

- 47) 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.
- 48) Proposals for development of pit through proper benching in particular at the 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)
- 49) Bank Guarantee shall be submitted and to be coterminous with plan period.
- 50) 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
- 51) All the proposals should be made within ML only.
- 52) Review of the Mining Plan has not been prepared as per guidelines
- 53) Document is deviating with guidelines issued by IBM ensuring proper documents for systematic mining proposal for mineral conservation and environment protection.
- 54) 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.
- 55) All the annexure should be attested by qualified person for their authenticity.
- 56) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 57) There are several typographical mistakes which required to be corrected.
- 58) 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.
- 59) Note: All the corrections mentioned in the text and plates shall also be attended invariably

