

Scrutiny comments on Review of Mining Plan submitted by M/s BMM Cement Limited for it's Gudipadu Limestone Mine over an extent of 454.59 hectare in Gudipadu village, Yadiki Mandal, Anantapur District submitted under rule 17(2) of MCR 2016.

Inspecting officer:- Mr. Ibrahim Sharief, Sr. Assistant Controller of Mines

Accompanying mine official:- Sri S Suresh Reddy, Mines Manager & Shri Venkata Ramana, Geologist & QP.

1. According to the submitted information in the document, there is an ambiguity over the ownership of the subject lease. In this regard, a letter is written to the State Director of Mines & Geology, Government of Andhra Pradesh on 02.12.2019 with endorsement to you. Clarification in this regard has to be submitted.
2. The Document should be submitted as per the prescribed format of 'IBM Manual for appraisal of Mining plan 2014' only.
3. QP should put his signature in all the pages of the document.
4. Details of Board of Directors of the company should be furnished.
5. The individual Survey nos. with its area extent, with nature of land shall be furnished in tabular form.
6. Details of last modification of approved Mining plan along with reasons should be furnished in para 3.2.
7. Year wise review of earlier approved MMP from 2017-18 to 2019-20 (so far) should be furnished. It is noted that there is generation of Sub-grade ore in addition of usable ore and is being utilised by blending with high grade ore. In this regard year wise details of the mineral reject (as part of ROM) generated and utilised should be furnished.
8. Para 3.6 is related to justification for modification, whereas the document is submitted for Review of Mining plan, justification furnished in this para is not warranted.
9. As per provision of rule 15 of MCR 2016, the document should be submitted by a responsible person i.e. Qualified person only and not the qualified persons. Hence only one person be made responsible for the purpose of submitting the view of the lessee to the department and making corrections in the document.
10. Colour photographs should be enclosed in the document for easy reference pertaining to boundary pillars, quarry, dump, afforestation, core logs, ground control points etc.

Geology

11. Phase wise exploration carried out in the lease area should have been furnished in tabular form
12. Details of all bore holes drilled so far should be submitted in tabular form incorporating Bore hole no., location (Lat/ Long), collar RL, Depth at which ore encountered/ exhausted from surface, angular/ vertical, core recovery% etc..
13. Contours are not matching with actual field condition, to be corrected.
14. Following criteria needs to be considered for reserve estimation:
 - (i) Area excluded from the lease area.
 - (ii) Ultimate Pit limit.
 - (iii) Recovery of ore considered based on past experience.
15. Limestone ore of 15 to 18% SiO₂ is considered as Sub-grade and is stated to be estimated separately, but no estimation is made. Further blending proportion of Mineral reject with High grade ore for optimum utilisation of Limestone is to be computed and submitted.
16. UPL should be established considering mineable part of the reserves; benches should be distinctly marked in relevant sections for considering the same.
17. Section-wise calculation details should be furnished in main text itself.
18. Future exploration should be proposed in this plan period to comply the provision of rule 12(4) of MCDR, 2017.

Mining

19. Present status of pit to be submitted incorporating its dimension, benches in Ore/ Waste/ Top Soil, location for clarity.
20. In year wise production proposal table, page no. 52, Limestone mixed with Clay should have considered as part of Total excavation/ ROM.
21. Substantial quantity of low grade stock is available in the lease area in mineral reject stock near crusher, the re-handling proposal of the same should be proposed in 'Dump handling' para.
22. Year wise Production and development should be proposed with proper Layout of Mine working.

Conceptual Plan

23. Top soil should have been utilised for green belt development instead of stacking at conceptual stage. Further area considered as ‘Others(PMCP)’ should be detailed.

PMCP

24. Base Line data and EIA/EMP as prepared by agency accredited by MOEF should be furnished.
25. Retaining wall along bottom periphery of top soil dump should be proposed.

PLATES

26. Surface Plan: Surface plan incorporating all the surface features as per the lease Sketch authenticated by State Government should be submitted. Further the Surface plan should be signed by mine surveyor for its correctness and its accuracy.
27. Key Plan: Key plan should be submitted on Survey of India topo sheet, incorporating all the details under rule 32 of MCDR 2017.
28. Environment plan: Dwellings are observed within 500 meters of the lease boundary, the same should be incorporated in the plan.
29. All the Plans & Sections should be serially numbered.
30. Geological Plan:
- (i) Sections should be marked distinctly in Geological Plan.
 - (ii) Geological features like Dip, Strike of the ore body, limestone exposure etc. should be marked.
 - (iii) Mineralised and Non mineralized area, Category of area under G1, G2, G3 should be marked distinctly.
31. Geological Section:
- i. Section should be submitted in A0 size sheet for easy handling.
 - ii. Collar RL of bore holes, UNFC Codes, UPL etc. should be marked distinctly
32. Year wise development Plan and sections
- i. Pit layout as detailed in the text should be marked over the plan.

ANNEXURES

33. Reference quoted in the document should be annexed and serially numbered, for easy reference.
34. Annexure submitted should be legible for easy reference

In view of the comments above, modification in relevant para/ plans and sections should be suitably modified.



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Phone No. : (040)-27539992/2753993
Fax No.(TF): (040)-27539991
E-Mail : ro.hyderabad@ibm.gov.in
AP/ANP/MP/Lst-58/Hyd.

Room No.603, 6th Floor,
CGO Towers, Kavadiguda,
Secunderabad – 500 080
Date: 17.12.2019.

To
Dr..Anand Reddy,Nominated Owner,
M/s BMM Cements Ltd,
Road No.10,Plot No.111,
Jubilee Hills,
Hyderabad-500 033
Telangana State.

Sub: Submission of Review of Mining Plan in respect of Gudipadu Limestone mine of M/s BMM Cements Ltd over an extent of 454.59Ha.. in Gudipadu village of Yadiki Mandal, Anantapur District of AP State submitted under Rule 17(2) of MCR, 2016.

Ref: 1.Your letter no. BMM/MIN/102 dated 01.11.2019.

Sir,

With reference to your letter cited above on the subject, your draft Review of Mining plan is examined and the site inspection was carried out on 29.11.2019 by Shri Ibrahim Sharief, Sr.ACOM accompanied by Shri S.Suresh Reddy,Mines Manager (Qualified Person) and Shri S.Venkata Ramana,Geologist (Qualified Person) and found certain deficiencies as given in Annexure. The same has been forwarded to you and your Qualified Person on respective e.mail ids i.e., info@sagarcements.in, sureshreddys@sagarcements.in and ramanacv@sagarcements.in.

02. You are advised to attend these deficiencies as per the annexure and resubmit the document, complete in all respects, in three bound copies along with soft copy in the form of CD (2Nos.). In this regard you are directed to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities @ Rs.Three lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs.Ten lakhs as per the provision of Rule 27(1) of MCDR, 2017 at the time of submission of final copies of the document within 15 (fifteen) days from the date of issue of this letter, failing which the document will be disposed without giving any further opportunity.

03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

Yours faithfully,

Sd/-

(Shailendra Kumar)
Regional Controller of Mines

Copy to Shri S.Suresh Reddy, Qualified person and Shri C.Venkata Ramana,Qualified Person for information & necessary action.

Sd/-

(Shailendra Kumar)
Regional Controller of Mines

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