



Ref No. EMMRL/Bandha/FC/2023-24/001

Date: 29.08.2023

प्रति,
प्रधान मुख्य वन संरक्षक (भू-प्रबंध)
मध्यप्रदेश, भोपाल

विषय - वन मंडल सिंगरौली के परिक्षेत्र बैढ़न / सरई पूर्व के वन कक्ष RF-389, 390, 291, 292, 293, 391, 296, 320 & PF-316, 317 के रकबा 781.94 हे. वनभूमि एवं विभिन्न खसरों के रकबा 3.55 हे. राजस्व वनभूमि कुल रकबा 785.49 हे. वन / राजस्व वनभूमि में बंधा कोल ब्लॉक ओपन कास्ट कोयला उत्खनन के व्यपर्तन का - मेसर्स ई. एम. आई. एल माइंस एंड मिनरल रिसोर्सेज लिमिटेड का ऑनलाइन प्रस्ताव क्रमांक F /MP/MIN/144129/2021

सन्दर्भ:- पत्र क्रमांक / एफ - 1 / 841 / 2023 / 10 - 11 / 2708 भोपाल, दिनांक - 3 - 7 - 23

श्रीमान,

विषयांकित परियोजना के सम्बन्ध में पत्र क्रमांक / एफ - 1 / 841 / 2023 / 10 - 11 / 2708 भोपाल, दिनांक - 3 - 7 - 23 के माध्यम से 19 बिंदुओं पर जानकारी चाही गयी थी, जिनकी जानकारी इस पत्र के द्वारा प्रस्तुत की जा रही है (जानकारी संलग्न)। उक्त पत्र के द्वारा हम ये भी अवगत करना चाहेंगे की राजस्व वनभूमि जिसका कुल रकबा 785.49 हे. था वो अब 807.917 हे. हो गया है जिसकी जानकारी भी उत्तरों के साथ संलग्न है।

अतः आपसे अनुरोध है की कृपा कर आप इन जानकारियों को भारत सरकार, पर्यावरण वन एवं जलवायु परिवर्तन मंत्रालय, नई दिल्ली को प्रेषित करने का कष्ट करें।

सादर,

ईएमआईएल माइंस एंड मिनरल रिसोर्सेज लिमिटेड के लिए

दीपेश भाटिया
परियोजना प्रमुख - बंधा

प्रतिलिपि: -

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REPLY TO EDS RAISED BY MOEF FOR BANDHA COAL BLOCK

EDS Document No : 8-17/2023-FC Dated 9 June 2023

29.08.2023

EMIL MINES AND MINERAL RESOURCES LTD.
Waidhan, Singrauli, Madhya Pradesh

Reply Summary

Sl.No	EDS Query	Reply																																																																																					
1	<p>The component wise detail of the area proposed to be diverted has to be commensurate with the mining plan. The mining plan as submitted does not contain the component wise details of forest land. The State Govt. shall ensure that the component wise breakup as given in the online part-I shall invariably be in consonance with the approved mining plan.</p>	<p>घटकवार (कॉम्पोनेन्ट वाइज) विवरण एप्रूव्ड माइन प्लान एंड माइन क्लोज़र प्लान के अध्याय-6 (भूमि आवश्यकता), तालिका 6.1.1 और 6.1.2 में दिया गया है।</p> <p>एक्सटर्नल ओबी डंपिंग (डी2) 350 हेक्टेयर क्षेत्र में प्रस्तावित है। कुल 350 हे. में से शामिल वन क्षेत्र 183.753 हे. है और इसका उल्लेख एप्रूव्ड माइन प्लान एंड माइन क्लोज़र प्लान के प्लेट संख्या 9, 12 और 21 बी में भी किया गया है। बंधा कोल ब्लॉक की एप्रूव्ड माइन प्लान एंड माइन क्लोज़र प्लान के विवरण।</p> <table><tr><th colspan="3"></th><th colspan="3">Component Wise Land Use Details as Per Approved Mine Plan (785.49)</th><th colspan="3">Component Wise Land Use Details as Per Revised Forest Land (807.92)</th></tr><tr><th rowspan="2">Sl. No.</th><th rowspan="2">Component Details</th><th rowspan="2">UOM</th><th colspan="2">Area</th><th rowspan="2">Total Area</th><th colspan="2">Area</th><th rowspan="2">Total Area</th></tr><tr><th>Pvt.+ Govt.</th><th>Forest</th><th>Forest</th><th>Pvt.+ Govt.</th></tr><tr><td>1</td><td>External dump</td><td>Ha.</td><td>117.27</td><td>233</td><td>350.27</td><td>183.753</td><td>166.517</td><td>350.27</td></tr><tr><td>2</td><td>Railway Siding</td><td>Ha.</td><td>15.46</td><td>0.54</td><td>16</td><td>0.54</td><td>15.46</td><td>16</td></tr><tr><td>3</td><td>Infrastructure + Settling Pond</td><td>Ha.</td><td>87.17</td><td>13.23</td><td>100.4</td><td>0</td><td>77.619</td><td>77.619</td></tr><tr><td>4</td><td>Pit/Internal Dump</td><td>Ha.</td><td>814.8</td><td>500.56</td><td>1315.36</td><td>538.463</td><td>776.897</td><td>1315.36</td></tr><tr><td>5</td><td>Rationalisation/Undisturbed area</td><td>Ha.</td><td>23.09</td><td>30.95</td><td>54.04</td><td>77.681</td><td>0</td><td>77.681</td></tr><tr><td>6</td><td>safety zone</td><td>Ha.</td><td>7.66</td><td>7.21</td><td>14.87</td><td>7.48</td><td>6.53</td><td>14.01</td></tr><tr><td colspan="3">Total Land Use Details</td><td>1065.45</td><td>785.49</td><td>1850.94</td><td>807.917</td><td>1043.02</td><td>1850.94</td></tr></table> <p>वन क्षेत्र में एक्सटर्नल डंप के संबंध में: 1850.94 हेक्टेयर का संपूर्ण ब्लॉक क्षेत्र "कोल् बिअरिंग क्षेत्र" है। एक्सटर्नल डंप के लिए 183.753 हेक्टेयर वन क्षेत्र का उपयोग अपरिहार्य है। एक्सटर्नल डंप के लिए चयनित क्षेत्र में कोयला भंडार काफी गहराई में जमा है, और ओपन-कास्ट विधि के माध्यम से कोयला निकालने के लिए व्यवहार्य नहीं है। अतः, हमारा विनम्र अनुरोध है कि 183.753 हेक्टेयर में एक्सटर्नल डंप के लिए वन क्षेत्र के उपयोग की अनुमति दी जाए।</p>				Component Wise Land Use Details as Per Approved Mine Plan (785.49)			Component Wise Land Use Details as Per Revised Forest Land (807.92)			Sl. No.	Component Details	UOM	Area		Total Area	Area		Total Area	Pvt.+ Govt.	Forest	Forest	Pvt.+ Govt.	1	External dump	Ha.	117.27	233	350.27	183.753	166.517	350.27	2	Railway Siding	Ha.	15.46	0.54	16	0.54	15.46	16	3	Infrastructure + Settling Pond	Ha.	87.17	13.23	100.4	0	77.619	77.619	4	Pit/Internal Dump	Ha.	814.8	500.56	1315.36	538.463	776.897	1315.36	5	Rationalisation/Undisturbed area	Ha.	23.09	30.95	54.04	77.681	0	77.681	6	safety zone	Ha.	7.66	7.21	14.87	7.48	6.53	14.01	Total Land Use Details			1065.45	785.49	1850.94	807.917	1043.02	1850.94
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2	<p>As per DSS analysis, total area of forest land within the mining lease is found 807.917 ha instead of 785.49 ha as per online</p>	<p>आवेदक संस्था ने अपने प्रारंभिक प्रस्तुतिकरण में लगभग 22.427 हेक्टेयर (Labelled as ENCR) जो की प्रस्तावित वन भूमि RF 290 कम्पार्टमेंट का भाग है, को शामिल नहीं किया गया ।</p> <p>हालाँकि, अब त्रुटि को सुधार लिया गया है और डायवर्जन के लिए प्रस्तावित ब्लॉक के अंदर नया वन क्षेत्र 807.917 हेक्टेयर है। आवेदक संस्था ने नए केएमएल (KML) और भू-संदर्भित (geo-referenced maps) मानचित्रों के साथ एक नया वन क्षेत्र विवरण प्रस्तुत किया है।</p>																																																																																					

Sl.No	EDS Query	Reply
	application submitted on PARIVESH. The same needs clarification	
3	Satellite imagery shows that the plantation work has been carried out in the RF-291, RF-292 and RF-293 proposed for diversion. The state shall submit the details of the plantations carried out	चूंकि ब्लॉक 3 मार्च 2021 को आवेदक संस्था को निहित कर दिया गया था। ब्लॉक के भीतर डायवर्जन के लिए प्रस्तावित बंजर वन भूमि पर अतिक्रमण को रोकने के लिए, उक्त क्षेत्र में वृक्षारोपण के लिए गड्ढे खोदे गए थे। खुदाई के अलावा कोई भी पौधारोपण कार्य नहीं किया गया है। इसका भुगतान आवेदक संस्था द्वारा चरण-1 वन मंजूरी के दौरान किया जाएगा।
4	Satellite imagery shows that two (2) Transmission lines are passing through RF-389 which is proposed for diversion. As per satellite these transmission lines came into existence after April 2020. the same needs justification. The details of approval obtained (if any) in this regard shall also be submitted	<p><u>FP/MP/TRANS/37348/2018 –29.78 Hectares diversion and FP/MP/TRANS/37350/2018 –24.70 Hectares</u></p> <p>1. मौजूदा ट्रांसमिशन लाइनें, 400 केवी डबल सर्किट और 400 केवी मल्टी-सर्किट लाइनें हैं जो डायवर्जन के लिए प्रस्तावित कम्पार्टमेंट आरएफ-389 से गुजर रही हैं, उन्हें बंधा कोयला ब्लॉक के आवंटन के कारण फिर से डायवर्ट किया जा रहा है। इस डायवर्जन के लिए एफसी स्टेज-1 की मंजूरी प्रस्ताव संख्या एफपी/एमपी/ट्रांस/144947/2021 के तहत प्राप्त कर ली गई है।</p> <p>2. आरएफ-389 से गुजरने वाली इन 2 लाइनों का निर्माण अमेरिका कोल ब्लॉक के चालू होने के कारण अप्रैल 2020 के बाद शुरू हुआ। आरएफ-389 से गुजरने वाली इन लाइनों के डायवर्जन के लिए वन अनुमति प्रस्ताव संख्या (एफपी/एमपी/ट्रांस/37348/2018-29.78 हेक्टेयर डायवर्जन और एफपी/एमपी/ट्रांस/37350/2018-24.70 हेक्टेयर) के माध्यम से अमेरिका कोल ब्लॉक द्वारा प्राप्त की गई थी।</p>
5	Satellite imagery shows the presence of Metal Road, few settlements, seasonal Nallah, Ponds etc. within the proposed forest land for diversion. The same needs justification.	<p>1. मौसमी नाले की पहली और दूसरी क्रम की धाराएँ, जो खनन गतिविधि का हिस्सा बनेंगी, एप्रूव्ड माइन प्लान एंड माइन क्लोजर प्लान के अनुसार सक्षम अधिकारियों से अनुमोदन के बाद वर्षवार खनन कार्यों के अनुसार डाइवर्ट की जाएंगी।</p> <p>2. आस-पास के गाँवों को कनेक्टिविटी प्रदान करने के लिए ब्लॉक आवंटन से पहले से ही उल्लिखित क्षेत्र में मेटल रोड (पीएमजीएसवाई) अस्तित्व में थी। इन सड़कों को बाद में सक्षम अधिकारियों से मंजूरी के बाद खदान के जीवनकाल के दौरान वर्षवार खनन योजना के अनुसार ब्लॉक बाउंड्री के अलॉग डाइवर्ट किया जाएगा।</p> <p>3. अनुमोदित आर एंड आर नीति के अनुसार ब्लॉक क्षेत्र के भीतर की बस्तियों को जिला प्रशासन द्वारा अनुमोदित किये गए आर एंड आर स्थल पर पुनर्वासित किया जाएगा।</p>
6	The Mining Lease (ML) Boundary needs to be verified on ground because part of the existing Railway line is	ब्लॉक सीमा के कोऑर्डिनेट्स एमओसी, भारत सरकार से वेस्टिंग आर्डर के तहत प्राप्त किए गए हैं और इसे सीएमपीडीआई द्वारा सत्यापित किया गया है। इसी के अनुसार डीजीपीएस सर्वेक्षण करा ब्लॉक बाउंड्री को चिह्नित किया गया है। रेलवे लाइन ब्लॉक सीमा

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	coming under the ML boundary	के कार्डिनल पिलर नंबर पी-44 के 33 मीटर अंदर से गुजरती है जिससे 50 m की दूरी तक कोई भी माइन इन्फ्रास्ट्रक्चर की प्लानिंग नहीं की गयी है।
7	KML file of the Compensatory afforestation land has been given for an area of 748.25 Ha (DSS Calculated) which is approximately 37.24 ha less than the actual requirement	ग्राम जेरवाड़ा में सीए भूमि पैच की के.एम.एल. फ़ाइल, खसरा संख्या: 264/1, क्षेत्रफल: 34 हेक्टेयर, परिवेश पोर्टल पर अपलोड करने के दौरान त्रुटिवश छूट गई थी। अब ठीक कर दी गई है और KML फ़ाइल अपलोड कर दी गई है। प्रस्तावित सीए भूमि पैच के लिए, Google Earth क्षेत्र माप उपकरण के माध्यम से क्षेत्र की पुनर्गणना और कुल क्षेत्रफल के बाद, पैच का कुल भूमि क्षेत्रफल 807.91 हेक्टेयर है।
8	Satellite imagery shows that the construction of settlements/ built-up area is going on in the revenue village Saderi, Khasra No 379 proposed for CA	ग्राम सडेरी के खसरा 379 में 9 छोटे-छोटे मकान हाल ही में बने हैं। निर्माण सितंबर 2022 के बाद, यानी मई 2022 में उपयुक्तता प्रमाण पत्र प्राप्त होने के बाद हुआ है। वन विभाग को भूमि हस्तांतरित करने से पहले, राजस्व विभाग अवैध निर्माण को हटा देगा। आवेदक संस्था ने सीए के लिए अतिक्रमण मुक्त भूमि उपलब्ध कराने का वचन पत्र दिया है।
9	Satellite imagery shows that some pre-plantation operations like benching and contouring have been carried out in the Villages namely Simra and Hardwara under Katni District and Village Bija Nagri under Agar Malwa District proposed for Compensatory Afforestation.	चूंकि राजस्व भूमि लंबे समय से उपयोग में नहीं आ रही थी, इसलिए स्थानीय पंचायत ने भूजल स्तर बढ़ाने के लिए कुछ ट्रेंचेस खोदी हैं। सीए के लिए प्रस्तावित भूमि पर कोई मानवीय अतिक्रमण नहीं है।
10	Construction of Road is going on in the Village Kandari under Agar Malwa District which has been proposed for CA. The same needs clarification	उल्लिखित क्षेत्र में कोई नया निर्माण नहीं किया जा रहा है। यह पुरानी कच्ची सड़क है। इसके लिए फ़ील्ड फ़ोटोग्राफ़ "विस्तृत प्रश्नवार उत्तर दस्तावेज़" परिशिष्ट में संलग्न हैं।

Sl.No	EDS Query	Reply
11	The CB analysis has been calculated on old NPV rates. The rates of NPV has been revised vide Ministry's letter No. File No.5-3/2011-FC(Vol-I) dated 06.01.2022. Therefore, the Cost Benefit analysis has to be submitted on the prescribed format keeping in view the revised rates of NPV	आवेदक संस्था (यूए) द्वारा 06.01.2022 की संशोधित एनपीवी दरों के आधार पर नया और अद्यतन लागत लाभ (कॉस्ट बेनिफिट एनालिसिस) विश्लेषण फिर से प्रस्तुत किया गया है जो की अनुलग्नक-III के रूप में संलग्न है।
12	Satellite imagery shows the presence of Agricultural land and plantation carried out recently (as per satellite imagery date 01.05.2021) within the forest patches applied for diversion	भूमि का कुछ हिस्सा जो की डायवर्जन के लिए प्रस्तावित है, जिस पर वन और राजस्व विभाग दोनों दावा कर रहे हैं, जिसके लिए आवेदक संस्था द्वारा अतिरिक्त सीए भूमि उपलब्ध कराई जा रही है। इस आम क्षेत्र में स्थानीय ग्रामीणों द्वारा कुछ कृषि गतिविधियां और वृक्षारोपण किया गया है।
13	Two important Nallah/River tributary i.e., Bandha Nala which comes under the catchment of Sone River and Kachanmuda Nala of which water flows into Rihand Dam are flowing through the mining lease area. In this regard the detail of the proposed mitigation measures and impact of the project on the hydrological regime in the area shall be submitted	आवेदक संस्था द्वारा प्रस्तावित शमन उपायों के साथ क्षेत्र के हाइड्रोलॉजिकल रेजीम पर खनन के प्रभाव का आकलन करने के लिए अधिकृत सलाहकार द्वारा एक विस्तृत वैज्ञानिक अध्ययन किया गया है और इसे डब्ल्यूआरडी, मुख्य अभियंता, गंगा बेसिन, रीवा (अनुलग्नक-IV के रूप में संलग्न प्रतिलिपि) द्वारा अनुमोदित किया गया है।

Sl.No	EDS Query	Reply
14	The KML files indicating the different components of the projects shall be submitted conspicuously depicting the various projects components vis-à-vis including the components proposed to be undertaken on the non-forest land	एप्रूव्ड माइन प्लान एंड माइन क्लोजर प्लान के अनुसार विभिन्न परियोजनावार घटकों की केएमएल फाइल संलग्न है (सॉफ्ट कॉपी).
15	Details of coal evacuation plan and involvement of forest land, if any, shall be intimated	कोयले की निकासी रेल द्वारा करने की योजना है। एमएल क्षेत्र के भीतर साइलो और आरएलएस के साथ एक निजी रेलवे साइडिंग प्रस्तावित है। रेलवे लाइन के एक छोटे से हिस्से को छोड़कर, जो 0.54 हेक्टेयर वन भूमि से होकर गुजर रहा है, कोयला निकासी से संबंधित संपूर्ण बुनियादी ढांचे की योजना गैर-वन भूमि पर बनाई गई है। रेलवे साइडिंग के लिए डीपीआर को रेलवे ने मंजूरी दे दी है.
16	The State Govt. reported that the proposed forest land had been diverted under the FRA, 2006 for 2 personal use and 7 community use purpose. However, details of the same have not been provided, which shall be submitted	व्यक्तिगत उपयोग (2 संख्या) और सामुदायिक उपयोग (7 संख्या) के लिए दिए गए "वन अधिकार पत्र" का विवरण संलग्नक-VI के रूप में संलग्न और अंकित है।
17	As per online part I, the proposed activities like Coal Handling Plan, Coal Stack Yard, Settling Pond, OB Dumps along the periphery etc thus comprising an area of 179.87 are non-site specific in nature. Therefore, the State Govt. shall explore the possibility of shifting the	आवेदक संस्था ने सीएचपी, कोयला स्टॉक, मैगजीन, सबस्टेशन, एडमिन बिल्डिंग, आदि जैसी गैर-साइट-स्पेसिफिक गतिविधियों को गैर-वन भूमि पर स्थानांतरित करने के लिए एमओईएफ (MoEF) से सहमत हैं। तदनुसार, आवेदक संस्था ने गैर-साइट-स्पेसिफिक गतिविधियों को गैर-वन क्षेत्र में स्थानांतरित करने का संशोधन किया है (एक्सटर्नल डंप के लिए प्रस्तावित क्षेत्र - 183.753 हेक्टेयर और रेलवे साइडिंग के लिए प्रस्तावित क्षेत्र - 0.54 हेक्टेयर को छोड़कर)। गैर-साइट-स्पेसिफिक गतिविधियों के लिए कुल क्षेत्रफल 443.889 हेक्टेयर है और इसमें से एक्सटर्नल डंप और रेलवे साइडिंग के लिए प्रस्तावित संयुक्त वन क्षेत्र 183.753 हेक्टेयर है।

Sl.No	EDS Query	Reply
	infrastructure activity on the nearby non-forest land	
18	Details of proposed reclamation/ back-filled area at the end of mine life of the proposed forest land has not been given in Mining plan. The same needs submission	<p>खनन गतिविधियाँ पूरी होने के बाद आवेदक संस्था द्वारा कुल 1310 हे. भूमि को वृक्षारोपण कर (1600 से 2500 पौधे प्रति हेक्टेयर की दर से) टेक्निकली एंड बिओलॉजिकली रिक्लेम किया जाएगा। इसमें से 807.91 हे. भूमि को एफसी अधिनियम के अनुसार वन विभाग को सौंप दिया जाएगा।</p> <p>807.917 हे. वन क्षेत्र, जिसके रिक्लेमेशन की योजना है, 183.753 हेक्टेयर वन क्षेत्र एक्सटर्नल डंप में वृक्षारोपण के माध्यम से रिक्लेम किया जाएगा, और शेष 624.164 हेक्टेयर को बैक-फिलिंग (समतलीकरण) के बाद रिक्लेम किया जाएगा और फिर उसपर वृक्षारोपण किया जाएगा।</p>
19	The DFO/ CCF recommended the proposal subject to fulfilment of the Wildlife Management plan. However, the comments of CWLW has not been submitted in view the proposed area is part of elephant corridor. The same needs submission	वन्यजीव प्रबंधन योजना को सीडब्ल्यूएलडब्ल्यू द्वारा अनुमोदित कर दिया गया है और इसे अनुबंध-VII के रूप में संलग्न किया गया है।

Annexure- Detailed Query wise Reply

Query Sl. No i

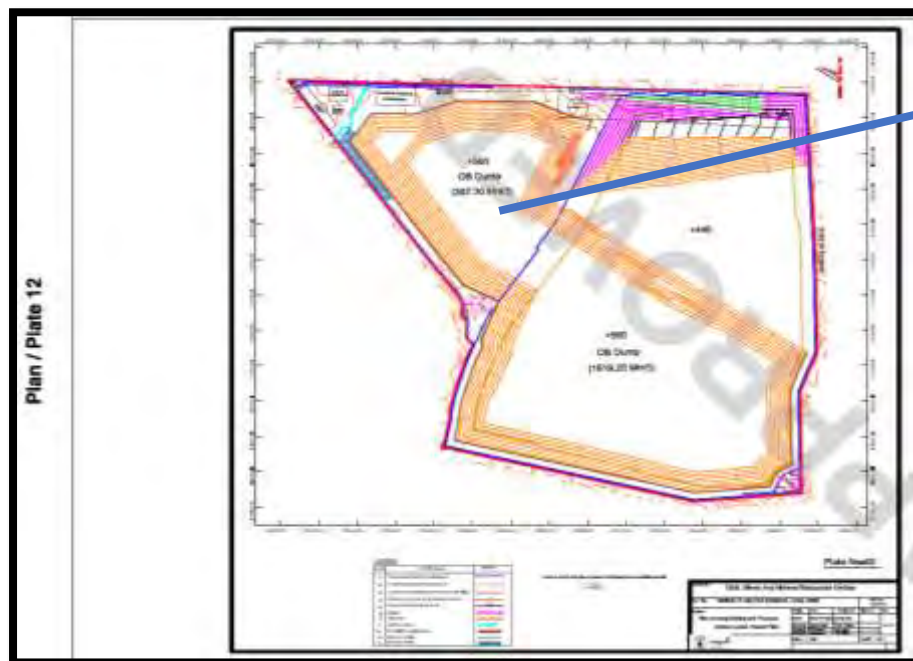
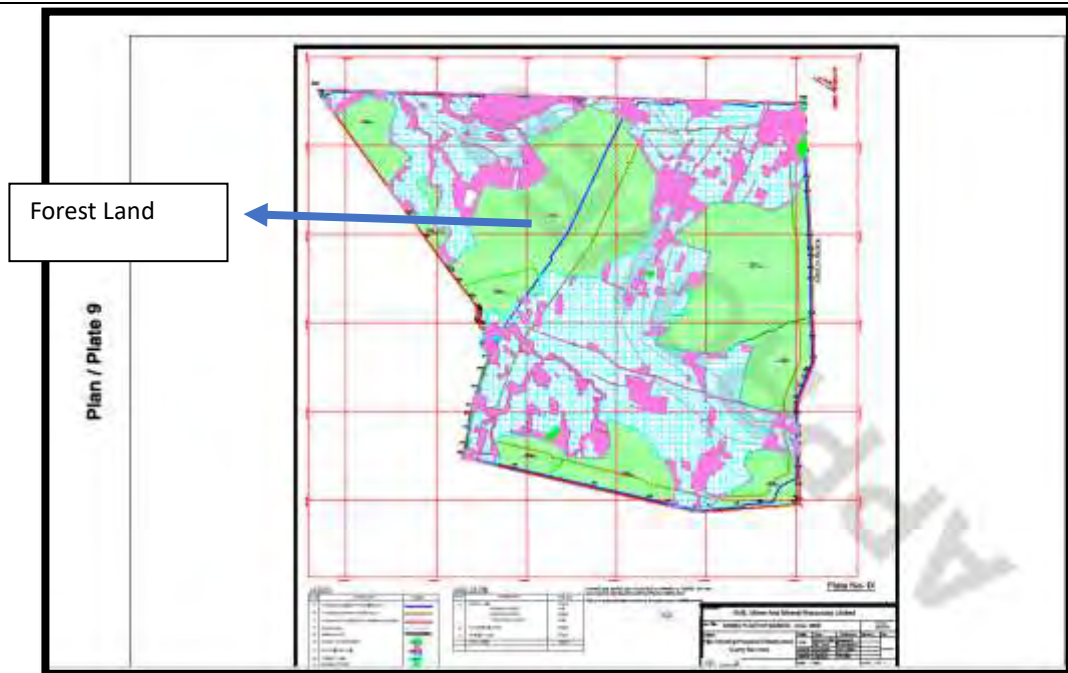
Sl. No i: The component wise detail of the area proposed to be diverted has to be commensurate with the mining plan. The mining plan as submitted does not contain the component wise details of forest land. The State Govt. shall ensure that the component wise breakup as given in the online part-I shall invariably be in consonance with the approved mining plan.

Reply to Sl. No i

The component wise breakdown is given in Chapter-6 (Land Requirement), Table 6.1.1 and 6.1.2 of Approved Mining Plan and Mine Closure Plan. External OB Dumping (D2) is proposed over an area of 350 Ha. in initial years, out of this 350 Ha. the forest area involved is 183.517 Ha. and the same has been mentioned in Plate No. 9, 12 and 21B of Approved Mining Plan and Mine Closure Plan of Bandha Coal Block. Excerpts from Approved Mining Plan and Mine Closure Plan of Bandha Coal Block is shown below.

			Component Wise Land Use Details as Per Approved Mine Plan			Component Wise Land Use Details as Per Revised Forest Land (807.92)		
Sl. No.	Component Details	UOM	Area		Total Area	Area		Total Area
			Pvt.+ Govt.	Forest		Forest	Pvt.+ Govt.	
1	External dump	Ha.	117.27	233	350.27	183.753	166.517	350.27
2	Railway Siding	Ha.	15.46	0.54	16	0.54	15.46	16
3	Infrastructure + Settling Pond	Ha.	87.17	13.23	100.4	0	77.619	77.619
4	Pit/Internal Dump	Ha.	814.8	500.56	1315.36	538.463	776.897	1315.29
5	Rationalisation/Undisturbed area	Ha.	23.09	30.95	54.04	77.681	0	77.681
6	safety zone	Ha.	7.66	7.21	14.87	7.48	6.53	14.01
Total Land Use Details			1065.45	785.49	1850.94	807.917	1043.02	1850.94

2.5.9	<p>Further investigation for soil leachate</p> <p>The proposed external dump track that crosses under and over the dump has been designed to be supported by underground method of mining. In compliance 2.2.2 the thickness of main vertical beam is estimated as 7.50 m to 10.00 m. In compliance 2.2.10 the approximate section of beam is to be 30.75 m and proposed to be extended by underground mining method. It is requested to provide details of the thickness data in this proposed external dump track and whether the length of thickness of beam is 10 m or less. Considering the same thickness is requested to calculate the method of subtraction of beam (10) and percentage reduction in the area this will contribute to cost of work.</p>	<p>The Reduction of the Dump (10) below the underground area marked as C2, extend from 7.50m to 10.00m (Avg. 8.75m) and back slope directly of this dump is approx 55:45. With a mine production technology of underground 1.2, 1.3 and mining method may be extended in any window in the continuation of underground mining method. 54655500 in the 2nd underground area below the external dump C2 235.54 has been kept and only 100m has been taken for expansion of the beam area as provided by beam department. The beam has been in the dump area in an approximate area of 100 (4-m) to extend 2.00. This work is already not sufficient for underground mining. To find out the details of the beam will be provided after visit mining in the area. A detailed Planning of Underground Mining with production schedule will be provided to visit Ministry of Mining Dept.</p>
3	LAND REQUIREMENT	
3.1.8	<p>Planned Rehabilitation programme</p> <p>PCS shall be done as per existing plan. Proposed Green Park policy (Municipal Corporation) at the Mining Plan may not be relevant.</p>	<p>PCS should be formulated as per MCC/MPR 2015. Estimated 100 crores needed.</p>
4	PROGRESSIVE & FINAL MMC CLOSURE PLAN	
4.1.1	<p>Land Degradation and restoration plan</p> <p>Post closure activities starts from year 1-40, through the life of the mine is 45 years. This shall be completed the determination of 1-4 of the project. Para 3.1.1 of the Guidelines of MCC dated 2015, 2020 shall be referred to.</p>	<p>Year 2020-27 is marked as P2 (PC-6C-1) due to working of this year to pre construction and operations period. Subst. of the activity will be started after year as the year has been considered in evaluating mine account cost considering table 4.1 of the mine 45 years.</p>
4.1.2	<p>Reconstruction & Rehabilitation (Closures in 74)</p> <p>Post closure activities starts from year 1-40, through the life of the mine is 45 years. This shall be completed the determination of 1-4 of the project. Para 3.1.1 of the Guidelines of MCC dated 2015, 2020 shall be referred to.</p>	<p>Year 2020-27 is marked as P2 (PC-6C-1) due to working of this year to pre construction and operations period. Some of the activity will be started after year as the year has been considered in evaluating mine account cost considering table 4.1 of the mine 45 years.</p>
(OTHER)		
	<p>1. A pre calculation before the scope of work in Baroda Coalfield and in different stages it has been determined as Baroda Open cast project. To be completed.</p> <p>2. A pre calculation is part of the Mining Plan. It should be relevant.</p>	<p>1. An suggestion, some of the project has been changed in Baroda Coalfield.</p> <p>2. An suggestion, some of the project has been changed in Baroda Mining Plan.</p>



Query No ii

SI. No ii: As per DSS analysis, total area of forest land within the mining lease is found 807.917 ha instead of 785.49 ha as per online application submitted on PARIVESH. The same needs clarification.

Reply to SI. No ii

The user agency in its initial submission did not consider around 22.427 Ha. (Labelled as ENCR) of area as Forest Land in compartment RF-290. However, now the error has been rectified and the new forest area inside the block proposed for diversion is 807.917 Ha. The user agency has submitted a new forest area statement along with New KML and geo-referenced maps.

Forest Area Statement				
SI No	Division	Range	Compartment No	Proposed Area (Ha.)
1	Singrauli	Waidhan	RF 389	40.088
2	Singrauli		RF 390	0.683
Total (A)				40.771
1	Singrauli	Sarai East	RF 292	284.855
2	Singrauli		PF 316	19.276
3	Singrauli		PF 317	67.418
4	Singrauli		RF 293	55.131
5	Singrauli		RF 319	1.000
6	Singrauli		RF 291	234.863
7	Singrauli		RF 391	68.916
8	Singrauli		RF 392	25.805
9	Singrauli		RF 320	0.792
10	Singrauli		RF 290	5.442
11	Singrauli		RF 294	0.031
12	Singrauli		RF 296	0.068
Total (B)				763.597
Total Protected & Reserved Forest (A+B)				804.368
Revenue Forest (C)				3.550
Grand Total (A+B+C)				807.918

Query No iii

Sl. No iii: Satellite imagery shows that the plantation work has been carried out in the RF-291, RF-292 and RF-293 proposed for diversion. The state shall submit the details of the plantations carried out.

Reply to Sl. No iii

As the block was vested to the user agency on 3rd of March 2021. To prevent encroachment over barren forest land proposed for diversion within the block, pits for plantation were dug in the said area. No plantation work except digging has been done. Payment of the same will be done by the user agency during Stage-I forest clearance.

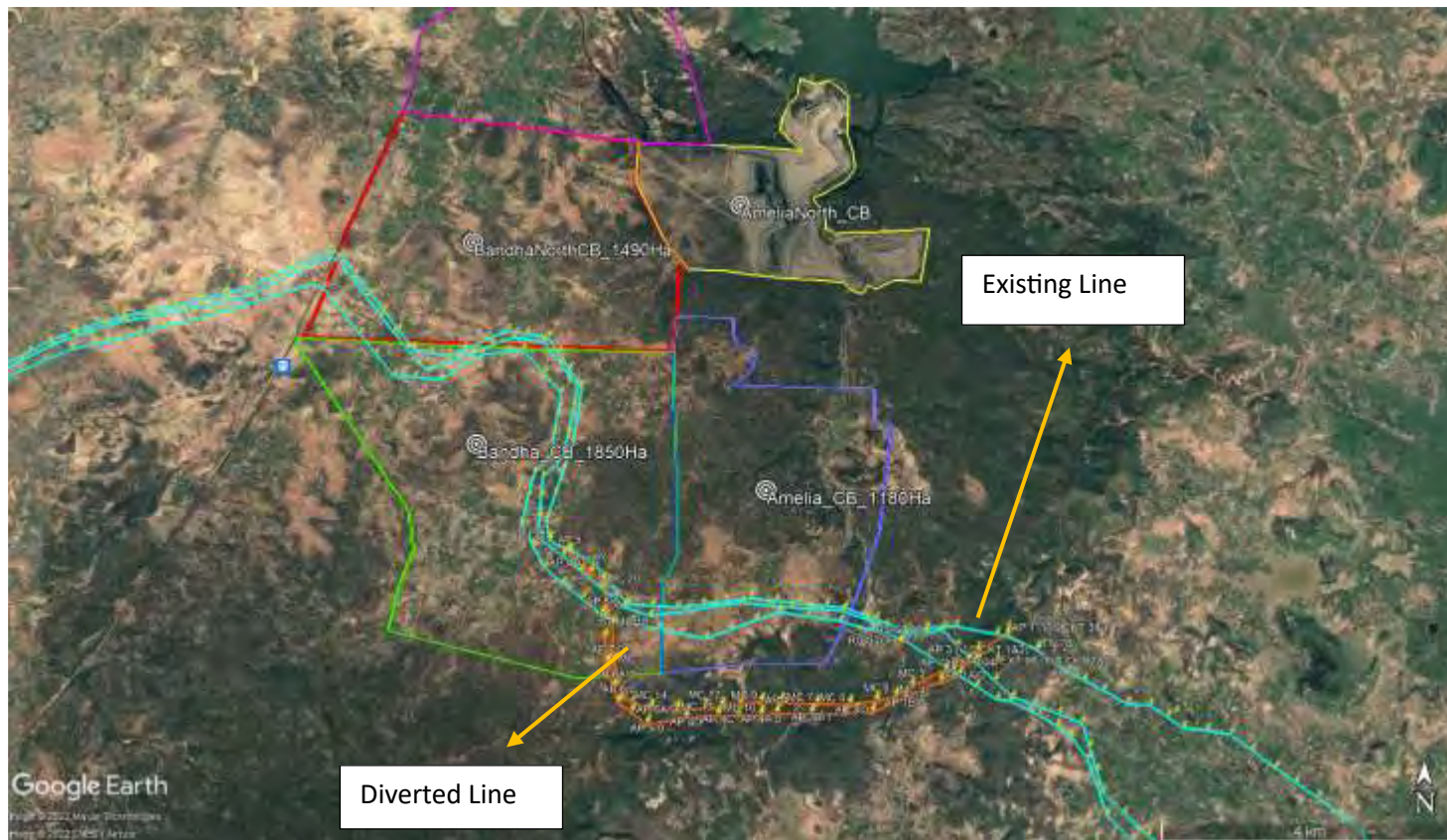
Query No iv

Sl. No iv: Satellite imagery shows that two (2) Transmission lines are passing through RF-389 which is proposed for diversion. As per satellite these transmission lines came into existence after April 2020. the same needs justification. The details of approval Obtained (if any) in this regard shall also be submitted.

Reply to Sl. No iv

1. The existing Transmission lines are 400 KV Double Circuit and 400 KV Multi-Circuit Lines which are passing through RF-389 proposed for diversion are being re-diverted due to allotment of Bandha Coal Block. FC Stage-1 Clearance for this diversion has been obtained. The proposal number is FP/MP/TRANS/144947/2021.
2. The construction of these 2 lines passing through RF-389 started after April 2020 due to commissioning of Amelia Coal Block. The forest permission for diversion of these lines passing through RF-389 was obtained by Amelia Coal Block via proposal nos. (FP/MP/TRANS/37348/2018 –29.78 Hectares diversion and FP/MP/TRANS/37350/2018 –24.70 Hectares)

FP/MP/TRANS/37348/2018 –29.78 Hectares diversion and FP/MP/TRANS/37350/2018 –24.70 Hectares



Query No V

SI. No v: Satellite imagery shows the presence of Metal Road, few settlements, seasonal Nallah, Ponds etc. within the proposed forest land for diversion. The same needs justification

Reply to SI. No V

1. 1st & 2nd Order Streams of seasonal nallah which will form part of mining activity, will be diverted as per year wise mining operations after approval from competent authorities as per Approved Mining Plan and Mine Closure Plan.
2. Metal roads (PMGSY) has been in existence in the mentioned area before the allotment of the block for providing connectivity to nearby villages. These roads will be subsequently diverted along the block boundary as per year wise mining plan during the life of the mine after approval from the competent authorities.

3. Settlements within the block area will be rehabilitated to R&R site identified by District Administration as per approved R&R Policy.



Query No vi

Sl. No vi: The Mining Lease (ML) Boundary needs to be verified on ground because part of the existing Railway line is coming under the ML boundary.

Reply to Sl. No vi

The block boundary co-ordinates have been obtained from MoC, Govt. of India as part of Vesting Order (block allotment) dated 03.03.2021 and the same has been verified by CMPDI. The boundary co-ordinates have been marked on the ground after DGPS survey. Railway line passes 33m inside the block boundary from Cardinal Pillar No. P-44 and no major infrastructure is planned within 50m from the railway line.

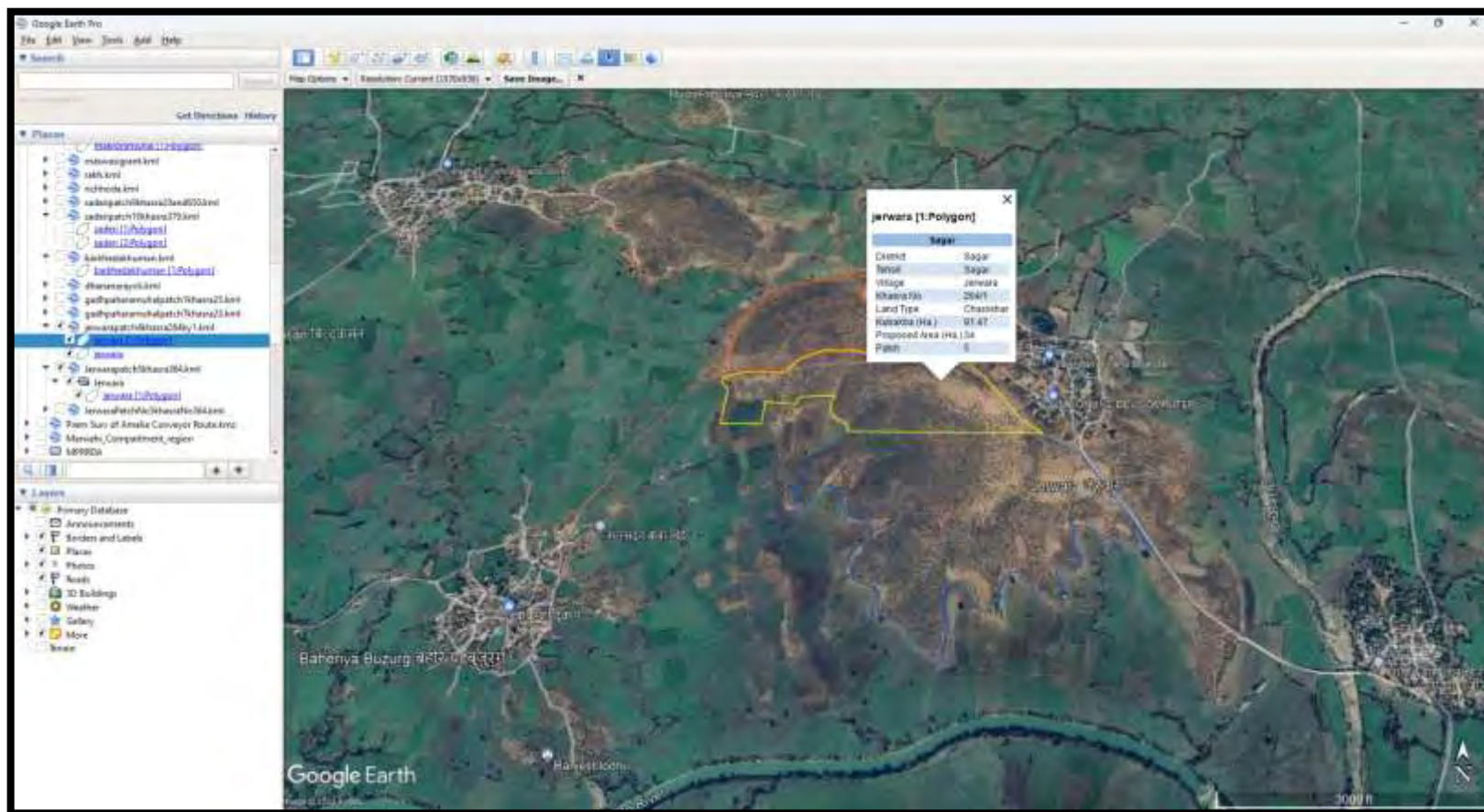


Query No vii

Sl. No vii: KML file of the Compensatory afforestation land has been given for an area of 748.25 Ha (DSS Calculated) which is approximately 37.24 ha less than the actual requirement.

Reply to Sl. No vii

KML file of CA land patch in Village: Jerwara, Khasra No: 264/1, Area: 34 Ha, got left out during uploading in Parivesh portal. The error has been corrected now and KML file is uploaded. After recalculating and totalling the area, via Google Earth area measurement tool, for the proposed CA land patches, the total land area of the patches is 807.91 Ha.



Query No viii

Sl. No viii: KML file of the Satellite imagery shows that the construction of settlements/ built-up area is going on in the revenue village Saderi, Khasra No 379 proposed for CA.

Reply to Sl. No viii

There are 9 small houses that are recent construction in Khasra 379 of village Saderi. The construction took place after September 2022 i.e., after the suitability certificate has been obtained in May 2022. Before the transfer of the land to Forest Dept., the revenue department will remove the illegal construction. The user agency has given an undertaking to provide the encroachment free land for CA.

Historical Imagery from 2022



Query No IX

Sl. No ix: Satellite imagery shows that some pre-plantation operations like benching and contouring have been carried out in the Villages namely Simra and Hardwara under Katni District and Village Bija Nagri under Agar Malwa District proposed for Compensatory Afforestation

Reply to Sl. No IX

The local panchayat has dug few trenches to increase the ground water level since the revenue land was being un-used for a long time. Otherwise, there is no human encroachment in the land proposed for CA.

District: Katni; Village Simra & Hardwara



District: Agar; Village Bija Nagri



Query No X

Sl. No x: Construction of Road is going on in the Village Kandari under Agar Malwa District which has been proposed for CA. The same needs clarification

Reply to Sl. No X

No new construction is being done in the mentioned area. It is an old existing kaccha road. Field Photographs for the same are attached in the annexure "Detailed Query wise reply document".



Query No XI

Sl. No Xi: The CB analysis has been calculated on old NPV rates. The rates of NPV has been revised vide Ministry's letter No. File No.5-3/2011-FC(Vol-I) dated 06.01.2022. Therefore, the Cost Benefit analysis has to be submitted on the prescribed format keeping in view the revised rates of NPV

Reply to Sl. No XI

New and updated Cost Benefit Analysis based on the revised NPV rates of 06.01.2022 has been re-submitted by User Agency (UA). Attached as Annexure-III.

Annexure-III: REVISED COST BENEFIT ANALYSIS

EMIL Mines and Mineral Resources Limited - Bandha Coal Mine

COST BENEFIT ANALYSIS FOR FOREST DIVERSION OF 807.91 HECTARES AREA OF BANDHA COAL MINE (Reserve Forest – 708.46 Ha, Protected Forest - 95.90 Ha, Revenue Forest - 3.55 Ha)

Table A: Cases under which a cost-benefit analysis for forest diversion is required.

S. No	Nature of proposal	Applicable/ not applicable	Remarks
1	All categories of proposal involving forest land up to 20 Ha in plains and up to 5 hectares hills	Not applicable	These proposals are to be considered on case-by-case basis and value judgment.
2	Proposal for defense installation purposes and oil prospecting (prospecting only)	Not applicable	In view of National Priority accorded to these sectors, the proposals would be critically assessed to help as certain that the utmost minimum forest land above is diverted for non-forest use.
3	Habitation, establishment of industrial unit, tourist lodges, complex and other building construction	Not applicable	These activities being detrimental to protection and conservation of forest, as a matter of policy, such proposals would be rarely entertained.
4	All other proposals involving forestland more than 5 hectares in hills including roads, transmission lines, minor, medium and major irrigation projects, mining activity, railway lines, location specific installations like microwave stations, auto repeater centers, TV towers etc.	Applicable	These are cases where a cost benefit analysis is necessary to determine when diverting the forest land to non-forest use is in the overall public interests. The present proposal is for diversion of 807.91 Ha of ML area.

Table B: Estimation of Cost of Forest Diversion

Sr. No	Parameters	Remarks
1	Ecosystem services losses due to proposed forest diversion (NPV of forest)	Economic value of loss of eco-system services due to diversion of forests at proposed villages in Singrauli District of Madhya Pradesh shall be Rs. 1228590.00 /Ha -NPV rate for 807.91 Ha Notified Forest, as per Eco Class II Value of Dense Forest Class) as per Guideline of MoEF&CC, GOI dated 06.01.2022 As prescribed by Central Government (MoEF&CC). 1. Total Forest area: 807.91 Ha. 2. Environmental loss: 807.91 Ha X 1228590.00; = Rs. 992590147
2	Loss of Animal Husbandry, loss of fodder 10% of NPV (As per Cost Benefit Guideline)	= 10% X Rs. 992590147 = Rs. 99259014.7
3	Cost of Human Settlement (As per approved R&R plan)	Not Applicable Though there are no human resettlement in Forest Land, cost of human resettlement (R&R) in Tenancy Land is included in project cost estimates
4	Loss of public facilities & infrastructure (On actual cost)	Not applicable Though there are no loss of public facilities & administrative infrastructures on forest land but cost of public facilities & administrative infrastructures in outside the forest area is included in project cost estimate
5	Possession value of forest land diverted (30% of NPV)	a. Circle rate of adjoining area in the district as a cost component as possession value of forest land is arrived as Rs. 20 lakhs / Ha X 807.91 Ha = Rs.161.58 /- Cr b. 30% of environmental costs (NPV) due to loss of Forest (99.25 X 0.30 =Rs. 29.77/- Cr.) c. Circle rate of adjoining area is Rs. 161.58/- Cr, which is maximum compared to 30%

		of NPV. Hence Rs. 161.58/- Crores is considered as possession value of forest land to be diverted =Rs. 1615800000/-
6	Cost of Suffering to oustees (1.5 times have earned in last 2yrs)	No human habitation exists on forest land proposed to be diverted as such there is no social cost of rehabilitation of oustees. However, cost likely to be incurred in R&R plan is provided in the project cost.
7	Habitat Fragmentation Cost	Habitat fragmentation cost taken as 50% of NPV = 50% X Rs. 992590147 = Rs. 496295073
8	Compensatory afforestation and soil & moisture conservation	CA Scheme for 807.91 Ha is Rs. 404992144

Total cost due to diversion of forest land: = (992590147+ 99259014.7+ 1615800000+ 496295073+ 404992144)
= Rs. 3608936379
= Rs 360.89 crores

Table B1: Project Cost Estimates

Table - B 1 - Project Cost Estimates			
Sl No	Particulars	Value in Crores	Remarks
1	Capital investment including preoperative expenses	1,987	
2	R&R Cost	150	Cost of human resettlement (R&R) in Tenancy Land
3	Cost of Public facilities including administrative cost	100	Cost included diversion of HT lines, RERC Lines, Roads etc.
4	Net present value (NPV) payable to Forest Dept. for total forest land of 807.91 hectares	NIL	Cost included in the part of Forest cost in the Project

5	Cost of Compensatory Afforestation payable to Forest Dept. The cost of Afforestation on revenue forest land -807.91 Hectares	99.25	Cost included in the part of Forest cost of the Project
Total Project Cost in Rs. Crores= 2,331/-			

Table C: Existing guidelines for estimating benefits for Forest Diversion

Table C: - Estimation of Benefits of Forest Diversion					
Life of the Project		40 Years for Opencast Mines			
Construction Period		Excluding 4 years of construction period			
SI No	Parameters	Calculation			
1	Increase in Productivity Attribute to the Bandha Coal Mine	Net Revenue due to Coal			
		SI No	Parameters	Rate (Rs.)	Unit
					Amount (In Cr.)
		I	Gross Revenue from ROM Coal for life of the Open Cast Mine (G 10 Grade) up to 250 Meter depth total extractable reserves for a period of 30 years is 150 MTe @ Rs. 2500 / MTe (Representative Price)	2500/-	Rs. /MTe
					37,500/-

		li	Tentative operating cost including depreciation, interest on loan payment, tax liability etc. for 30 years @ (150 MTe X Rs.1530/- per MTe)	1530/-	Rs. /MTe	22,950/-
		Net Revenue benefits due to Coal (i - ii)				14,550/-
2		Net Revenue against Royalty, DMF, NMET, Compensation cess, total taxes, upfront etc. to State Govt. (@996/MTe)				14,940/-
3	No. of Population benefited due to the project	a. Population directly benefitted - 1406				2093/-
		b. Population indirectly benefitted - 5000				
		c. Employment generated on non-forest land in afforestation programme				
		d. Local people have income opportunity in various ancillary work & other activities				
		e. Engagement of 1406 direct and 5000 indirect employment per day for 300 days in a year up to 30 years of project life at the present wage rates of Rs. 410- & Rs. 350/- respectively as approved by Madhya Pradesh State Govt. for skilled labour.				
	Total Benefit to Employees and Local Population					2093/-

4	Economic benefits due to compensatory afforestation	Compensatory afforestation of 807.91 Ha of Land @1000 no of sapling & survival rate @80%. The sapling for 807.91 Ha = 807910 trees Survival trees@80% = 646328 Economic benefits of one tree accruing over next 50 years monetized in terms of providing oxygen, water, soil, moisture conservation, etc. + timber & firewood= 2.00 lakh Future benefits of 646328 nos. of trees @ 2.00 lakh = Rs. 1292656 crores	12926.56
	Total Benefit to Society		12926.56
	Total Benefits in Rs. Crores		44510/-

Cost Benefit Analysis Summary

Based on value of products:

A) Total Benefit to the Society = Rs 44510 crores (Table C)

B) Total Cost to the Society = Rs 2692 crores (Table B+ Table B1)

Cost Benefit Ratio = Total Benefit / Total Cost

= Rs 44510 / Rs 2692 crores = 16.53

Cost Benefit Ratio 1: 16.53

Query No xii

Sl. No xii: Satellite imagery shows the presence of Agricultural land and plantation carried out recently (as per satellite imagery date 01.05.2021) within the forest patches applied for diversion.

Reply to Sl. No xii

There is certain portion of land proposed for diversion which is being claimed by both Forest and Revenue department for which CA Land is being provided by user agency. This common area has some agricultural activities and plantation being done by local villagers.

Query No xiii

Sl. No xiii: Two important Nallah/River tributary i.e., Bandha Nala which comes under the catchment of Sone River and Kachanmuda Nala of which water flows into Rihand Dam are flowing through the mining lease area. In this regard the detail of the proposed mitigation measures and impact of the project on the hydrological regime in the area shall be submitted

Reply to Sl. No xiii

A detailed scientific study has been carried out by authorized consultant to assess the impact of mining on Hydrological regime of the area along with proposed mitigative measures (Copy enclosed as Annexure-IV) and the same has been approved by WRD, Chief Engineer, Ganga Basin, Rewa.

Query No xiv

Sl. No xiv: The KML files indicating the different components of the projects shall be submitted conspicuously depicting the various projects components vis-à-vis including the components proposed to be undertaken on the non-forest land.

Reply to Sl. No xiv

KML file of different project wise components as per Approved Mining Plan and Mine Closure Plan is enclosed (soft copy).

Query No xv

Sl. No xv: Details of coal evacuation plan and involvement of forest land, if any, shall be intimated.

Reply to Sl. No xv

Coal is planned to be evacuated by rail. A Private Railway siding is proposed within the ML area with Silo and RLS. Entire infrastructure related to coal evacuation is planned in non-forest land except a small part of Railway Line which is passing through 0.54 Ha. of forest land. DPR for the Railway Siding has been approved by Railways.

Query No xvi

Sl. No xvi: The State Govt. reported that the proposed forest land had been diverted under the FRA, 2006 for 2 personal use and 7 community use purpose. However, details of the same have not been provided, which shall be submitted.

Reply to Sl. No xvi

Details of "Van Adhikar Patra" given for personal use (2 nos.) and community use (7 nos.) is attached as and marked as Annexure-VI.

Query No xvii

Sl. No xvii: As per online part I, the proposed activities like Coal Handling Plan, Coal Stack Yard, Settling Pond, OB Dumps along the periphery etc thus comprising an area of 179.87 are non-site specific in nature. Therefore, the State Govt. shall explore the possibility of shifting the infrastructure activity on the nearby non-forest land.

Reply to Sl. No xvii

Project proponent agrees with MoEF for shifting the non-site-specific activities like CHP, Coal Stocks, Magazines, Substations Admin Buildings etc. to Non-Forest Land. Accordingly, the project proponent would shift the non-site-specific activities to non-forest area (except for area proposed for external dump - 183.753 Ha. and area proposed for railway siding - 0.54 Ha.). The total area for non-site-specific activities 443.889 Ha and out of which the combined forest area proposed for external dump & railway siding is 184.293 Ha.

Query No xviii

Sl. No xviii: Details of proposed reclamation/ back-filled area at the end of mine life of the proposed forest land has not been given in Mining plan. The same needs submission

Reply to Sl. No xviii

Total 1310 Ha. will be technically and biologically reclaimed with plantation. Out of which 807.91 Ha. will be handed over to Forest Department as per FC Act with plantation at the rate of 1600 to 2500 saplings per Ha. after completion of Mining activities.

Out of 807.917 Ha Forest area, that is planned for reclamation, an area of 183.753 Ha shall be reclaimed via plantation in external dumps, and the balance 624.164 ha shall be reclaimed after back-filling (levelling) and then the plantation will be taken up.

Query No xix

The DFO/ CCF recommended the proposal subject to fulfilment of the Wildlife Management plan. However, the comments of CWLW has not been submitted in view the proposed area is part of elephant corridor. The same needs submission

Reply to Sl. No xix

Wildlife Management Plan has been approved by CWLW and the same is attached as Annexure-VII.