

No 13624

VIOLATION LETTER
Registered AD/Speed post



Government of India
Ministry of Mines
Indian Bureau of Mines
Office of the Regional Controller of Mines, Jabalpur

File No.: -M.P./Katni /Limestone -02 Mine Code: - 38MPR47078 Scheme No.-11, Kamla Nehru Nagar,
Jabalpur, Dated: 03/08/2022
2296

To,
Shri Rajesh Kumar Jain (Partner),
M/s Ram Chandra badri Prasad Gour.
BD Agrawal Ward, Civil Lines
Post & District Katni (MP) 483501
Email -ramchandgour2106@gmail.com

Subject : Violation of provisions of Mineral Conservation and Development Rules, 2017, in respect to **Amehta Limestone Mine** over an area of **12.93 hect.** in **Katni District** of M.P.

Sir,
The following provisions of the Mineral Conservation and Development Rules 2017 were found violated in your above mine during the inspection on 12/07/2022 by Sh. R.S.Garg, Assistant Mining Engineer, accompanied by Shri Shalendra Kumar Jain, Mining Engineer of the mine.

नियम स.	पाए गए उल्लंघन की विस्तृत प्रकृति
Rule 11(1)	No holder of a mining lease shall commence or carry out mining operations in any area except in accordance with the mining plan approved, modified or reviewed by the Indian Bureau of Mines or prepared and certified in accordance with the system established by the State Government pursuant to the proviso to clause (b) of sub-section (2) of section 5 or approved by the competent authority of the Atomic Minerals Directorate for Exploration and Research, in respect of minerals specified in Part B of the First Schedule to the Act where the grade of such atomic minerals is equal to or above the threshold value limits declared under Schedule-A of the Atomic Minerals Concession Rules, 2016. Read with MCR (Amendment),2021 notified in Gazette of India vide dated 02/11/2021 The Review of Mining Plan of above mentioned mine was approved vide letter No.-MP/Jabalpur/Iron Ore / RMP- 06/2021-22 dated 09/07/2021 incorporating proposal of working from 2020-21 to 2025-26. During the inspection it was found that following activities have been carried out with violating the approved proposals :- i) In the year 2021-22 it was proposed to produced 5,21,500 metric tonnes of limestone, with removal of 57,645CUM top soil, 1,25,400CUM overburden and 55,000CUM OB dump handling . However in the year 2021-22 only 4,03,630 metric tonnes of limestone has been produced with removal of 87,872CUM overburden. Thus there are deviation of 23% in Production, 100-100% in top soil removal and dump handling and 30% in OB removal ii) Advancement of pit towards North (BP No. 11 & 12), East (BP no.15 to 22) and South (BP No.26 & 27) not reached upto the proposed locations.
12(4B)	For the exploration done under sub-rule (3) and (4), the holder of mining lease shall submit to the State Government and the Indian Bureau of Mines, a Geological Study Report prepared in the manner specified in the Minerals (Evidence of Mineral Contents) Rules, 2015, within three months after the completion of the exploration work. As per approved Review of Mining Plan 8 no. of boreholes have been carried out for the purpose but copy of the Geological Study Report(GSR) has not been submitted to this office even lapsing of four months after completion of boreholes
34A	Every lessee, other than those covered under sub-rule (1), shall submit soft copy of high resolution Geo referenced Ortho-rectified Multispectral satellite images of the leased area and up to hundred metres outside the lease boundary taken in the month of April to June of every year, to the Controller General on or before 1st day of July of the that year in the standards formats such as GeoTIFF along with metadata or any other format as may be specified by the Indian Bureau of Mines in this regard: A soft copy of high resolution Geo referenced Ortho-rectified Multispectral satellite images of the leased area and up to hundred metres outside the lease boundary taken in the month of April to June has not been submitted and the processed output [digital elevation model (DEM) and Orthomosaic] images have not been submitted as specified in the rule.
45(7)	If it is found that the holder of a mining lease or the person or company engaged in trading or storage or end-use or export of minerals, as the case may be, has submitted incomplete or wrong or false information in daily or monthly or annual returns or fails to submit a return within the date specified; then,- in the case of mining of minerals by the holder of a mining lease, the Regional Controller of Mines may advise the State Government to,- order suspension of all mining operations in the mine and to revoke the order of suspension only after ensuring proper compliance; take action to initiate prosecution under these rules; recommend termination of the mining lease, in case such suppression or misrepresentation of information indicates abetment or connivance of illegal mining;

On examination of Annual Return for the year 2021-22 it is observed that data of annual return are incomplete & having following deficiencies:-

1. Part III, item No 2-Royalty and Rents

Depreciation on fixed assets indicates as Rs 4238646/- differ with one indicated under Part IIA capital structure indicated as Rs. 4117146/-, needs clarification or correction.

2. Part III, item No 5

Details of DMF paid to State Govt. and NMET paid to Central Government are not indicated, appears incorrect.

3. Part V, item No. 4.2 Opencast

No. of benches and average height indicated for both Ore and OB/Waste are mismatching with respect to Depth of deposit working from adjacent ground, Needs correction.

4. Part VI, item No. 1 & 2 Production and stock of ROM ore at mine- head and Grade wise production and dispatches-----

Opening stock of Lst at mine head is 33.982tonne , production from mine and Grade wise production during the year both are 403630tonne thus available balance of Lst at mine head can not be 55238.98tonne it will remains 33.982tonne.

5. Part VI, item No. 2 & 5 Grade wise production and dispatches----- & Sales/Dispatches effected for Domestic Consumption----

i. Grade wise dispatch of BF grade Limestone indicated under Grade wise production and dispatches table is 348391.018tonne whereas total quantity of BF grade limestone dispatched to different consignees are 340650.501tonne. Thus there are ore accounting issues, need be clarified .

ii. Mineral is also supplied to non registered person/company/ firm .

6. Part VII Cost of Production

i. Mining cost is taken as Rs 123.02 per tone. As per data given in return total cost of components of mining costs (labour and supervision cost & material cost) comes about Rs. 90.06/ per tone. Even if maintenance(part III item no. 5), money value for other benefits paid to workmen (part III item no. 5) and payment made to professional agencies (part III item no. 5) also taken in to account under mining cost it comes about Rs. 92.50. A proper clarification required in this regard.

ii. It is learned from the return that 8 no. of boreholes have been done during the year but expenses incurred on matter concerned has not been taken in to consideration for calculation of mining cost.

iii. Overhead expenses taken into consideration for calculation of cost of production is Rs.12.98, which mismatches with the figures given in this regard in earlier part of the return, need be reconciled.

Taxes (GST etc.) paid have not taken in to account in calculation of cost of production.

Rs. 14.85 per tone amount considered against others (DMF and NMET) for the calculation of cost of production is not realistic, needs correction. As per rule 32% of royalty per tone goes towards DMF and NMET. In this case it will be about Rs. 25.60

2. In this connection, it is brought to your notice that the above violations constitute an offence punishable under Rule 62 of Mineral Conservations and Development Rules, 2017.

3. The mining operations can be suspended under the rule 11(2) of MCDR-2017, if compliance of rule 11(1) of MCDR-2017 are not found satisfactory. In case Non-compliance of Rule 45(7) of MCDR-2017, Necessary action shall be initiated as deemed fit.

4. You are advised to rectify the above violations immediately and intimate the position to this office within 45 (Forty-Five) days from the date of issue of this letter.

भारतीय
खान नियंत्रक
03/08/22
(नरेश कुमार कटारिया)
उप खान नियंत्रक
कृते क्षेत्रीय खान नियंत्रक

प्रतिलिपि प्रेषित :

01. The Director of Geology & Mining, Govt .of Madhya Pradesh, Khanij Bhavan, 29-A, Arera Hills, Bhopal(M.P.) for information and further necessary action please.

02. The District Collector, Katni (M.P.) for information.

भारतीय
खान नियंत्रक
03/08/22
उप खान नियंत्रक
कृते क्षेत्रीय खान नियंत्रक

मूल पर नहीं प्रतिलिपि प्रेषित :

01 खान नियंत्रक (मध्य), भारतीय खान ब्यूरो, नागपुर को सूचनार्थ प्रेषित।

02 DDG, Mining & Mineral Statistics Division, Indian Bureau of Mines, Nagpur for referback of Annual Return for the year 2021-22 for rectification of deficiencies as pointed out above under rule 45(7).

उप
खान
नियंत्रक

4-8-22

कृते

भारतीय
खान नियंत्रक
03/08/22
उप खान नियंत्रक
कृते क्षेत्रीय खान नियंत्रक