

INDIAN BUREAU OF MINES

--:-- Inspection Report --:--

Part-I : General Information

1.1.1 Mine Details

Name of the Mine :	VARVALA LIMESTONE MINE 76P	Lease Area (Ha) :	25
Forest Area (Ha) :	N/A	Mine Code :	38GUJ07089
Registration Number :	IBM/18552/2014	Name of lessee :	BHAVNA
Address of lessee :	Survey No. 76 ,Village Varvala, Dwarka	Phone of lessee :	-
Email of lessee :	Varvalamines@gmail.com	Fax Number :	N/A
Village :	Varavala	Taluka / Mandal :	Okhamandal
District :	Devbhumi Dwarka	Pincode :	361335
State :	Gujarat	Post Office :	N/A
Nearest Police Station :	N/A	Nearest Railway Station :	N/A
Date of Grant of Mining Lease :	2013-08-14	Date of Mining Lease Execution :	2013-08-14
Date of opening in the mine :	Nilsss		

Nominated Owner Details			
Name of the Nominated Owner :	N/A	Nominated Owner Address:	N/A
Nominated Owner Mobile :	N/A	Nominated Owner Email :	N/A
Nominated Owner Fax Number :	Nil	Date of Nominated Owner Appointment :	Nil
Mining Engineer Details			
Name of the Mining Engineer :	Sarth Bodawala	Qualification of Mining Engineer :	BE Mining
Address of Mining Engineer :	Gujarat	Phone of Mining Engineer :	N/A
Email of Mining Engineer :	N/A	Fax Number of Mining Engineer :	N/A
Date of Mining Engineer Appointment :	Nil		
Geologist Details			
Name of the Geologist :	Ajeet Singh	Qualification of Geologist :	Msc. Geology
Address of Geologist :	Gujarat	Phone of Geologist :	N/A
Email of Geologist :	N/A	Fax Number of Geologist :	N/A
Date of Geologist Appointment :	Nil		
Mine Manager Details			
Name of the Mine Manager :	Sarth Bodawala	Qualification of Mine Manager :	BE Mining
Address of Mine Manger :	Gujarat	Phone of Mine Manger :	N/A
Email of Mine Manger :	N/A	Fax Number of Mine Manger :	N/A
Date of Mine Manger Appointment :	Nil		

Mineral(s) granted in lease and proved for mining :	LIMESTONE	Date of Approval of Mining Plan / Modified Mining Plan / ROMP with five-year period :	2023-01-24 (2023 - 2027)
Method of mining :	Open Cast	Category :	MECHANISED
Nature of Use :	Non Captive		

Part-II : Other Information

2.1.1 : Inspection Details

Inspecting Officer :	Debajyoti Nayak
Designation :	Inspection Officer
Name of the Accompanying Official from Mine :	Ms. BHAVNA RAJENDRA TRIVEDI and Sarth Bodawala
Designation of the Accompanying Official :	Owner and Mine Manager
Type of Inspection :	MCDR,STR
Date of Inspection :	23/09/2025
Review year considered for MCDR Inspection :	2024-2025

2.2.1 : Exploration Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	Number of Core Boreholes	Not Proposed.	Nil	Not Applicable	No Violation
Remark: A total of 19 boreholes were carried out, out of which 11 were drilled in 2014, and 8 were drilled in 2021. The total leased area has been explored at the G1 level of exploration, so no proposal was given. Remark File: NIL					
2	Number of DTH Boreholes	Not Proposed.	Nil	Not Applicable	No Violation
Remark: The total leased area has been explored at the G1 level of exploration, so no proposal was submitted. Remark File: NIL					
3	Number of exploratory pits / trial pits	Not Proposed.	Nil	Not Applicable	No Violation
Remark: The total leased area has been explored at the G1 level of exploration, so no proposal was submitted. Remark File: NIL					
4	Number of exploratory Trenches	Not Proposed.	Nil	Not Applicable	No Violation
Remark: The total leased area has been explored at the G1 level of exploration, so no proposal was submitted. Remark File: NIL					
5	Lateral exploration status for the lease area - G1	25.0	25	0.000	No Violation
Remark: A total of 19 boreholes were carried out, out of which 11 were drilled in 2014, and 8 were drilled in 2021. With this borehole data, the total leased area has been explored at the G1 level of					

exploration. Remark File: NIL					
6	Lateral exploration status for the lease area-G2	Nil	Nil	Not Applicable	No Violation
Remark: NIL Remark File: NIL					
7	Lateral exploration status for the lease area-G3	0.00	Nil	Not Applicable	No Violation
Remark: NIL Remark File: NIL					
8	Lateral exploration status for the lease area-G4	0.00	Nil	Not Applicable	No Violation
Remark: NIL Remark File: NIL					
9	UNFC category wise reported Resources/Reserves as per MP/MMP ROMP Total Reserves (111, 121 & 122) and Total Mineral Resources (331, 332 & 333 upto 334)	LIMESTONE (in Tonnes) - Total Reserve (111)- 2682496.0, Total Resource (221) 1027100.00. As on 1/04/2024.	LIMESTONE (in Tonnes) - Total Reserve (111)- 2680791.00, Total Resource (221) 1027100.00	LIMESTONE (in Tonnes) - Total Reserve (111)- 1205.0, Total Resource (221)- Nil.	No Violation
Remark: Depletion of reserves during the year is 1205.0 (in Tonnes). Total production reported is 1205.0 (in tonnes). Remark File: NIL					

2.3.1 : Development - Opencast Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	Location of development w.r.t. lease area	Pit : 1 & Direction : West	Pit: 1 & Direction: West	Nil	No Violation
Remark: The development took place in Pit-1, with dimensions of approximately 110 × 82 × 2.5 meters, where a single bench has been made. Remark File: NIL					
2	Quantity of overburden generation in m3	Not Proposed	NA	NA	No Violation
Remark: No overburden has been reported within the lease area. Remark File: NIL					
3	Quantity of topsoil generation in m3	Not Proposed	NA	NA	No Violation
Remark: No topsoil has been reported within the lease area. Remark File: NIL					
4	Stripping ratio : ore to OB ratio	1:0	1:0	Nil	No Violation
Remark: No overburden has been reported within the lease area. Remark File: NIL					

2.4.1 Exploitation - Opencast Mine Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	Number of pits / Blocks proposed for production	One Number of pits (Pit ID: 1) proposed for production.	In Pit ID: 1 production was carried out in 2024-25.	Nil	No Violation
Remark: Production activities were undertaken in Pit-01. During the inspection, the pit was found to be submerged in water, and consequently, no production or excavation was in progress at that time. A single bench was observed within the pit. The approximate location of the pit is at Latitude 22°17'29.34"N and Longitude 68°56'56.748"E. Remark File: NIL					
2	Quantity of ROM mineral production proposed (in T)	89536.00	1205	88331.000	No Violation
Remark: A total of 1,205 tonnes of limestone was produced during the year 2024-25. The decline in production was primarily due to limited demand in the market. Remark File: NIL					
3	Recovery of salable/usable mineral quantity from ROM production in T)	89536.00	1205	88331.000	No Violation
Remark: 100% Recovery of salable/usable mineral quantity from ROM production in T. Remark File: NIL					
4	Quantity of mineral reject/Sub-grade generation	Not Proposed.	NA	NA	No Violation
Remark: No mineral reject/Sub-grade generation reported. Remark File: NIL					
5	Grade of mineral reject/sub-grade generation as per threshold value declared	Not Proposed.	NA	NA	No Violation
Remark: No mineral reject/Sub-grade generation reported. Remark File: NIL					
6	Manual/Mechanised method adopted for	Not Proposed.	NA	NA	No Violation

	segregating subgrade/mineral rejects from ROM				n
Remark: NO Manual/Mechanised method adopted for segregating subgrade/mineral rejects from ROM. Remark File: NIL					
7	Whether height of benches in Overburden& mineral suitable for method of mining proposed in mining plan	Max. 06 meter height of benches in mineral proposed for method of mining in mining plan	6 meter in mineral.	Nil	No Violation
Remark: NIL Remark File: NIL					
8	Any analysis or beneficiation study proposed & carried out for sub-grade mineral and reject	Not Proposed.	NA	NA	No Violation
Remark: No analysis or beneficiation study proposed & carried out for sub-grade mineral and reject. Remark File: NIL					

2.4.3 : Exploitation - Dump Working Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	Number of dumps proposed for production	No Proposal	NA	NA	No Violation
Remark: No overburden or waste dump has been reported within the mine lease area. Remark File: NIL					

2	Quantity of dump material handling Proposed (in Tonne)	No Proposal	NA	NA	No Violation
Remark: No overburden or waste dump has been reported within the mine lease area. Remark File: NIL					
3	Recovery of salable/usable mineral from dump production (in Tonne)	No Proposal	NA	NA	No Violation
Remark: NIL Remark File: NIL					
4	Production from dump(s) during the year	No Proposal	NA	NA	No Violation
Remark: NIL Remark File: NIL					
5	Quantity of mineral reject generation	No Proposal	NA	NA	No Violation
Remark: NIL Remark File: NIL					
6	Grade of mineral reject generation and threshold value declared	No Proposal	NA	NA	No Violation
Remark: NIL Remark File: NIL					
7	Any analysis or beneficiation study proposed & carried out for mineral reject	No Proposal	NA	NA	No Violation
Remark: NIL Remark File: NIL					
8	Manual / Mechanized	No Proposal	NA	NA	No

	method adopted for dump working				Violatio n
Remark: NIL Remark File: NIL					

2.5.1 : OB/Waste Dumps Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violatio n under Rule
1	Separate dumping of topsoil, OB & mineral rejects, fines, tailings (Rule 36,37)	Not Proposed.	NA	NA	No Violatio n
Remark: No separate dumping of topsoil, overburden, mineral rejects, fines, or tailings has been reported within the lease area. Remark File: NIL					
2	Location of Topsoil, OB/Waste, Mineral Reject dumps, Tailings and Fines	Not Proposed.	NA	NA	No Violatio n
Remark: No Topsoil, OB/Waste, Mineral Reject dumps, Tailings and Fines reported inside the lease area. Remark File: NIL					
3	Number of active & Inative dumps	Not Proposed.	NA	NA	No Violatio n
Remark: NIL Remark File: NIL					
4	Number of dead dumps	Not Proposed.	NA	NA	No Violatio n

Remark: NIL Remark File: NIL					
5	Number of dumps proposed for stabilished	Not Proposed.	NA	NA	No Violation
Remark: NIL Remark File: NIL					
6	Stabilization Technique (Terracing, plantation, geo-textiles etc.)	Not Proposed.	NA	NA	No Violation
Remark: NIL Remark File: NIL					

2.6.1 : Solid Waste Management - Backfilling (Opencast) Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	Status on part or full extraction of mineral from mined out area before starting backfilling	Not Proposed	NA	NA	No Violation
Remark: No proposal for Solid Waste Management through backfilling in opencast operations was submitted during 2024–25. Remark File: NIL					
2	Year-wise area under backfilling of mined out area	Not Proposed	NA	NA	No Violation
Remark: No proposal for backfilling operations was submitted during 2024–25. Remark File: NIL					

3	Year-wise topsoil generation, Utilization and Stored proposal (in m3)	Not Proposed	NA	NA	No Violation
Remark: No topsoil generation, utilisation and storage proposal given in the year 2024-25. Remark File: NIL					
4	Total area fully reclaimed & rehabilitated	Not Proposed	NA	NA	No Violation
Remark: No proposal for reclaimed & rehabilitated operations was submitted during 2024–25. Remark File: NIL					
5	Locations of proposed reclamation & rehabilitated	Not Proposed	NA	NA	No Violation
Remark: No proposal for reclaimed & rehabilitated operations was submitted during 2024–25. Remark File: NIL					

2.7.1 : Progressive Mine Closure Plan (PMCP) Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	Compliance on reclamation and rehabilitation by backfilling/Other means Total area and numbers of plantation proposed.	Plantation : Location :2465201 mN 494813 mE 2465070 mN 494861 mE, Area : 0.1, No. of Plant : 100 Plantation : Location :2465071 mN 494869 mE 2464946 mN 494914 mE, Area : 0.1, No. of Plant : 100	Plantation : Location :2465201 mN 494813 mE 2465070 mN 494861 mE, Area : 0.1, No. of Plant survived: 25.	Deviation in number of plants survived during inspection is 25.	Rule 11(1)
Remark: The plantation was carried out at the proposed location. While 100 saplings were proposed with an expected survival rate of 80%, only 25 plants were found to have survived during					

inspection. Remark File: NIL					
2	Rehabilitation by making water reservoir	Not Proposed	NA	NA	No Violation
Remark: NIL Remark File: NIL					
3	Compliance of Rehabilitation of waste land within lease i) Afforestation ii) Area rehabilitated (ha) iii) Method of rehabilitation	Not Proposed.	NA	NA	No Violation
Remark: No rehabilitation proposal for the wasteland was included in the lease for 2024-25. Remark File: NIL					
4	Compliance of Environmental monitoring (core zone & buffer zone)	Compliance of Environmental monitoring (core zone & buffer zone)	Carried out	Nil	No Violation
Remark: NIL Remark File: NIL					

2.8.1 : Mineral Conservation Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	ROM Mineral dispatch or grade-wise sorting within lease area	ROM Mineral dispatch or grade-wise sorting within lease area	ROM Mineral dispatch: 1705.000 tonnes Grade-wise sorting within lease area: Cement grade	Nil	No Violation

Remark: NIL Remark File: NIL					
2	Different grade of mineral sorted out at mines	Different grade of mineral sorted out at mines	Cement grade	Nil	No Violation
Remark: NIL Remark File: NIL					
3	Any beneficiation process at mines	Manual beneficiation process at mines	Manual sorting of minerals process at mines.	Nil	No Violation
Remark: NIL Remark File: NIL					
5	Utilization of Mineral Rejects or Sub-grade (Blending at ROM stage, Blending after Processing etc.)	Not Proposed.	NA	NA	No Violation
Remark: NIL Remark File: NIL					

2.9.1 : Environment Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	Separate removal and utilization of topsoil	Not Proposed	NA	NA	No Violation
Remark: NIL Remark File: NIL					

2	Use of overburden, waste rock, rejects and fines dumps for restoring the land to its original use	Not Proposed	NA	NA	No Violation
Remark: NIL Remark File: NIL					
3	Phased restoration, reclamation and rehabilitation of lands affected by mining operations (Pits, dumps etc)	Not Proposed	NA	NA	No Violation
Remark: NIL Remark File: NIL					
4	Plantation & Survival rate	Plantation : 100, Survival Rate : 80	No. of Plant : 25. Survival Rate : 25	Deviation in number of plants survived during inspection is 25.	Rule 11(1)
Remark: The plantation was carried out at the proposed location. While 100 saplings were proposed with an expected survival rate of 80%, only 25 plants were found to have survived during inspection. Remark File: NIL					
5	Water sprinkling on roads to control airborne dust	Water sprinkling on roads to control airborne dust	Water sprinkling on roads to control airborne dust carried out.	Nil	No Violation
Remark: NIL Remark File: NIL					

2.10 : Annual Return Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule

1	Submission of Online Monthly and Annual returns in prescribed period or not	Submission of Online Monthly and Annual returns.	Last Annual Returns: Submitted on 30/06/2025. Last Monthly Returns: Submitted in prescribed period.	Nil	No Violation
Remark: NIL Remark File: NIL					
2	Appointment of Mining Engineer & Geologist as per provisions of Rule 55 of MCDR,2017	Appointment of Mining Engineer & Geologist as per provisions of Rule 55 of MCDR,2017	Mine Engineer : Bodawala Sarth Manish. Geologist: Ajeet Singh	Nil	No Violation
Remark: NIL Remark File: NIL					
3	Whether incomplete or false or wrong returns submitted (Rule 45(7))	Incomplete or false or wrong returns submitted (Rule 45(7))	1.Total tress survived: 25 with survival rate of 25%. 2. The features presented in the PMCP KML file were found to be incomplete, incorrect.	Deviation Found.	Rule 26(2) Rule 45(7)
Remark: Discrepancies were observed in the AR 2024–25, Table No. 05, wherein 40 plants were reported as survived, while only 25 were found during inspection. This indicates a deviation of 55 plants from the proposed 80% survival rate. Furthermore, the PMCP report and KML file were not updated in accordance with the cumulative and assessment year PMCP works. Remark File: NIL					
4	Status of Approval of FMPCP u/r 24, 25 of MCDR,2017	Not Applicable	Not Applicable	Not Applicable	No Violation
Remark: NIL Remark File: NIL					
5	Notices and Returns for the lease area submitted or not where fine applicable	Nil	Nil	Nil	No Violation
Remark: NIL Remark File: NIL					
6	Scrutiny of Annual return on sale value, Ex. Mine price & production cost	Scrutiny of Annual return on sale value, Ex. Mine price & production cost	Sale value:295.60 rupees per tonne. Ex. Mine price: 295.60 rupees per tonne. Production cost: 304.41 rupees per tonne.	Deviation reported.	Rule 45(7)
Remark: It is observed that limestone was sold at 295.60 rupees per tonne, which is lower than the production cost of 304.41 rupees per tonne and substantially below the average sale price of 497					

rupees per tonne as published by IBM Nagpur in June. This discrepancy in selling at such a reduced price needs correction.
Remark File: NIL

2.11 : SDF Details

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violatio n under Rule
1	Start Ratings accorded for mine during last 3 years	Year of Submission : In 2023-2024 , Rating : 3 Stars. In 2024-2025: Rating : 3 Stars.	Year of Submission : In 2023-2024 , Rating : 3 Stars. In 2024-2025: Rating : 3 Stars.	Nil	No Violatio n
Remark: NIL Remark File: NIL					

Part-III : Other Reports

3.1.1 : Upload Other Reports

S.N.	Reports File	Remark File Description
1	1768808324696ddf8486c89MIDPAS_REPORT.pdf	MIDPAS Report
2	1768808324696ddf848bff2profile.pdf	Profile section

Part-IV : Summary Details

4.1 : Summary of Violations

S.N	Items for Reporting	As Per Approved Mining Plan	Actual	Deviation	Violation under Rule
1	Progressive Mine Closure Plan : Compliance on reclamation and rehabilitation by backfilling/Other means Total area and numbers of plantation proposed.	Plantation : Location :2465201 mN 494813 mE 2465070 mN 494861 mE, Area : 0.1, No. of Plant : 100 Plantation : Location :2465071 mN 494869 mE 2464946 mN 494914 mE, Area : 0.1, No. of Plant : 100	Plantation : Location :2465201 mN 494813 mE 2465070 mN 494861 mE, Area : 0.1, No. of Plant survived: 25.	Deviation in number of plants survived during inspection is 25.	Rule 11(1)
Remark: The plantation was carried out at the proposed location. While 100 saplings were proposed with an expected survival rate of 80%, only 25 plants were found to have survived during inspection. Remark File: NIL					
2	Environment : Plantation & Survival rate	Plantation : 100, Survival Rate : 80	No. of Plant : 25. Survival Rate : 25	Deviation in number of plants survived during inspection is 25.	Rule 11(1)
Remark: The plantation was carried out at the proposed location. While 100 saplings were proposed with an expected survival rate of 80%, only 25 plants were found to have survived during inspection. Remark File: NIL					
3	Annual Return : Whether incomplete or false or wrong returns submitted (Rule 45(7))	Incomplete or false or wrong returns submitted (Rule 45(7))	1.Total tress survived: 25 with survival rate of 25%. 2. The features presented in the PMCP KML file were found to be incomplete, incorrect.	Deviation Found.	Rule 26(2) Rule 45(7)
Remark: Discrepancies were observed in the AR 2024–25, Table No. 05, wherein 40 plants were reported as survived, while only 25 were found during inspection. This indicates a deviation of 55 plants from the proposed 80% survival rate. Furthermore, the PMCP report and KML file were not updated in accordance with the cumulative and assessment year PMCP works.					

Remark File: NIL					
4	Annual Return : Scrutiny of Annual return on sale value, Ex. Mine price & production cost	Scrutiny of Annual return on sale value, Ex. Mine price & production cost	Sale value:295.60 rupees per tonne. Ex. Mine price: 295.60 rupees per tonne. Production cost: 304.41 rupees per tonne.	Deviation reported.	Rule 45(7)
Remark: It is observed that limestone was sold at 295.60 rupees per tonne, which is lower than the production cost of 304.41 rupees per tonne and substantially below the average sale price of 497 rupees per tonne as published by IBM Nagpur in June. This discrepancy in selling at such a reduced price needs correction. Remark File: NIL					
5	Progressive Mine Closure Plan: Compliance on reclamation and rehabilitation by backfilling/Other means Total area and numbers of plantation proposed.	Plantation : Location :2465201 mN 494813 mE 2465070 mN 494861 mE, Area : 0.1, No. of Plant : 100 Plantation : Location :2465071 mN 494869 mE 2464946 mN 494914 mE, Area : 0.1, No. of Plant : 100	Plantation : Location :2465201 mN 494813 mE 2465070 mN 494861 mE, Area : 0.1, No. of Plant survived: 25.	Deviation in number of plants survived during inspection is 25.	Rule 11(1)
Remark: NIL Remark File: NIL					
6	Environment: Plantation & Survival rate	Plantation : 100, Survival Rate : 80	No. of Plant : 25. Survival Rate : 25	Deviation in number of plants survived during inspection is 25.	Rule 11(1)
Remark: NIL Remark File: NIL					
7	Annual Return: Whether incomplete or false or wrong returns submitted (Rule 45(7))	Incomplete or false or wrong returns submitted (Rule 45(7))	1.Total tress survived: 25 with survival rate of 25%. 2. The features presented in the PMCP KML file were found to be incomplete, incorrect.	Deviation Found.	Rule 26(2) Rule 45(7)
Remark: NIL Remark File: NIL					
8	Annual Return: Scrutiny of Annual return on sale value, Ex. Mine price & production cost	Scrutiny of Annual return on sale value, Ex. Mine price & production cost	Sale value:295.60 rupees per tonne. Ex. Mine price: 295.60 rupees per tonne. Production cost: 304.41 rupees per tonne.	Deviation reported.	Rule 45(7)
Remark: NIL Remark File: NIL					

Final Submitted

Esigned by: Debajyoti Nayak
Date: 19/01/2026 01:11:04 PM