

**INDIAN BUREAU OF MINES  
MINERALS DEVELOPEMMENT AND REGULATION DIVISION**

**MCDR INSPECTION REPORT**

**Ajmer regional office**

**Mine file No :** RAJ/BND-01/LST-1

**Mine code :** 38RAJ08002

- (i) Name of the Inspecting : **DJ03** ) **DILIP JAIN**  
Officer and ID No.
- (ii) Designation : Senior Mining Geologist
- (iii) Accompanying mine : Mr Manish Kumar Upadhyay, MIne Manager and Mr. N.K. P  
Official with  
Designation
- (iv) Date of Inspection : 15-NOV-21
- (v) Prev.inspection date : 31-OCT-20

**PART-I : GENERAL INFORMATION**

1. (a) **Mine Name** : **LAKHERI**
- (b) **Registration NO.** : **IBM/256/2011**
- (c) **Category** : **A Mechanised**
- (d) **Type of Working** : **Opencast**
- (e) **Postal address**
- State : **RAJASTHAN**
- District : **BUNDI**
- Village : **LAKHERI**
- Taluka : **INDERGARH**
- Post office : **LAKHERI**
- Pin Code : **323603**
- FAX No. : **07438-261504**
- E-mail : **suresh.wandhare@acclimited**
- Phone : **07438-261642**
- (f) **Police Station** : **Lakheri**
- (g) **First opening date** : **01-DEC-13**
- (h) **Weekly day of rest** : **SUN**
2. **Address for** : **Associated Cement Copany Ltd.**  
**correspondance** **Lakheri Cement Works, P.O.Lakheri**  
**Dist:- Bundi,Rajasthan, Pin-323603**
3. (a) **Lease Number** : **RAJ0003**
- (b) **Lease area** : **137.68**
- (c) **Period of lease** : **20**
- (d) **Date of Expiry** : **12-APR-99**
4. **Mineral worked** : **LIMESTONE** **Main**

## 5. Name and Address of the

Lessee : ASSOCIATED CEMENT CO. LTD.  
 LAKHERI CEMENT WORKS PO  
 LAKHERI-323603 BUNDI  
 RAJASTHAN  
 Phone:  
 FAX :

Owner : Sridhar Balakrishnan  
 Cement House,121, M K Road,  
 Mumbai, Maharashtra-400020  
 BUNDI RAJASTHAN  
 Phone: 022-22836672  
 FAX : 022-22836672

Agent : Suresh Dubey  
 Lakheri Cement Works,  
 Lakheri, Dist. Bundi,  
 Rajasthan BUNDI RAJASTHAN  
 Phone: 07438-261642  
 FAX : 07438-261642

## Mining Engineer

Name : Deepal Gorasia,Full Time  
 Qualification : B E Mining & FCC  
 Appointment/ : 12-MAR-14  
 Termination date

## Geologist

Name : N. K. Pandey,Full Time  
 Qualification : M Sc Geology  
 Appointment/ : 10-MAR-13  
 Termination date

## Manager

Name : Ajay Kumar Shrivastava  
 Qualification : B E (mining)  
 Appointment/ : 05-MAR-14  
 Termination date

6. Date of approval of Mining Plan/Scheme of Mining	:	Existing rule 11 MCDR1988	16-AUG-90
		Mining Scheme rule 12 MCDR1988	13-NOV-95
		Renewal under rule 22 MCR1960	13-NOV-00
		Renewal under rule 22 MCR1960	03-JUN-05
		Mining Scheme rule 12 MCDR1988	31-MAY-10
		Mining Scheme rule 12 MCDR1988	12-AUG-15
		MP modif under 17(3) MCR 2016	21-JUL-17
		Modif.of approved Mining Plan	20-NOV-18
		MP review under 17(1) MCR 2016	22-JAN-20
		MP modif under 17(3) MCR 2016	08-DEC-20

## PART - II : OBSERVATION/COMMENTS OF INSPECTING OFFICERS

## Exploration :

Sl.No.	Item	Proposals	Actual work	Remarks
1a	Backlog of previous year	24 BHs.	24 BHs.	Proposal and actual during previous year. 2019-20.
1b	Exploration over lease area for geological axis 1 or 2	A total of 50 Exploratory BHs with 1900.00 mts of drilling has been proposed during RY.	A total of 42 Exploratory BHs with 1867 mts of drilling has been done during RY.	Violation of rule 11(1) MCDR issued for shortfall in exploratory drillings vide letter dated 28/12/2021
1c	Exploration Agencies and Expenditure in lakh rupees during the year	No proposal of Exploration Agency & expenditure.	Agency: SPS Geo mining Solution Private Ltd. Expenditure is about 60.0 lacs.	NIL.
1d	Balance area to be explored to bring Geological axis in 1 or 2	No proposal.	An area of around 10.00 hectare is yet to explore.	NIL.
1e	Balance reserve as on 01/04/20	Reserve position was 229.45 million tonnes as on 01/09/2020 as per approved document dated 08/12/2020.	Reserve position was 228.81 as on 01/04/2021.	Depletion of around 0.64 million tones.
1f	General remarks of inspecting officers on geology, exploration etc	A total of 50 Exploratory BHs with 1900.0 mts of drilling has been proposed during RY.	A total of 42 Exploratory BHs with 1867 mts of drilling has been done during RY.	Violation of rule 11(1) of MCDR issued for shortfall in exploratory drillings vide letter dated 28/12/2021.

## Development :

Sl.No.	Item	Proposals	Actual work	Remarks
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2a	Location of development w.r.t.lease area	Development has been proposed in following blocks: P3 Lower and upper block, Utarana Block, Sakoda block	Development has been carried in proposed blocks.	NIL.
2b	Separate benches in topsoil, overburden and minerals (Rule 15)	No proposal of top soil removal. Separate removal of waste and mineral.	No top soil generation. Separate removal of waste and mineral.	NIL.
2c	Stripping ratio or ore to OB ratio	1:1.23 tone/tone	1:1.48 tone/tone	Violation of rule 11(1) of MCDR issued for variation in stripping ratio vide letter dated 28/12/2021.
2d	Quantity of topsoil generation in m3	No proposal of top soil removal.	No top soil patch encountered during mining.	NIL.
2e	Quantity of overburden generation in m3	1595255 tons. (OB/IB/SB)	1540674 tons. (OB/IB/SB)	NIL.
2f	General remarks of inspecting officers on development of pit w.r.t. type of deposit etc	Development has been proposed through opencast method.	Development has been carried out as per proposed method.	No issue related to method of development and suitable for type of deposit.

### Exploitation:

Sl.No.	Item	Propasals	Actual work	Remarks
3a	Number of pit proposed for production	Total 4 pits have been proposed.	Working has been carried out within approved proposals.	NIL.
3b	Quantity of ROM mineral production proposed	1300010.00 ton	1041272.00 ton	Less production due to covid-19 pandemic and less demand.
3c	Recovery of sailable/usable mineral from ROM production	1300010.00 ton	1041272.00 ton	Less production due to covid-19 pandemic and less demand.

3d	Quantity of mineral reject generation	No proposal of mineral rejects (MR) generation.	Mineral Reject has not been generated during RY.	NIL.
3e	Grade of mineral rejects generation and threshold value declared.	No proposal.	Not applicable as no mineral reject generation.	NIL.
3f	Quantity of sub grade mineral generation.	No proposal.	No sub-grade generation.	NIL.
3g	Grade of sub grade mineral generation	No proposal.	Not applicable as no sub-grade mineral generation.	NIL.
3h	Manual / Mechanised method adopted for segregating from ROM	Mechanized. (Crushing and Screening).	Mechanized. (Crushing and Screening).	NIL.
3i	Any analysis or beneficiation study proposed and carried out for sub grade mineral and rejects.	No proposal of analysis or beneficiation study for sub-grade mineral.	Not applicable as no proposal.	NIL.
3j	Provision of drilling and blasting in mineral benches	DTH Drill hole of 115 mm, Depth 9 Mtrs. Blasting by non-electric detonators.	DTH Drill hole of 115 mm, Depth 9 Mtrs. Blasting by non-electric detonators.	NIL.
3k	Provision of mining machineries in mineral benches	Rock Breaker, Excavator, dumper etc.	Rock Breaker, Excavator, dumper etc.	NIL.
3l	Whether height of benches in overburden and mineral suitable for method of mining proposed in MP/SOM	6 to 9 mts.	Height of the benches has been maintained as per proposal.	NIL.
3m	Total area covered under excavation/pits	168.74 hectare at the end of the plan period i.e. 2024-25.	221.353 hectare (as per AR 2020-21) at the end of the 2020-21.	Violation of rule 11(1) of MCDR issued for variation in landuse.

3n	Ore to OB ratio for the pit/mine during the year.	1:1.23 tone/tone	1:1.48 tone/tone	Violation of rule 11(1) of MCDR issued for variation in stripping ratio vide letter dated 28/12/2021.
3o	Total area put in use under different heads at the end of year	314.23 hectare at the end of the plan period i.e. 2024-25.	444.723 hectare (as per AR 2020-21) at the end of the 2020-21.	Violation of rule 11(1) of MCDR issued for variation in landuse.
3p	Production of ROM mineral during the last five year period as applicable	2016-17: 1020000 2017-18: 1000000 2018-19: 1158245 2019-20: 1202330 2020-21: 1372831 (figures in tones)	2016-17: 1202330 2017-18: 807761 2018-19: 1157250.7 2019-20: 1158926.7 2020-21: 1041272 (figures in tones)	NIL.
3q	General remarks of inspecting officers on method of mining etc.	Opencast method of mining has been proposed.	Opencast method of mining is being practiced.	The open cast mechanized method has been adopted which is best suited to the type of deposit.

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Solid Waste Management - Dumping:

Sl.No.	Item	Propasals	Actual work	Remarks
4a	Separate dumping of topsoil, OB and mineral rejects (Rule 32,33)	No proposal of top soil and mineral reject generation. OB/IB proposed to dump separately.	No top soil and mineral reject generation. Waste dumped on earmarked area.	NIL.
4b	Location of topsoil, OB and mineral reject dumps	Sakhoda, ML5A to ML6A, ML4 to ML9, ML 72 to ML74 and backfilling ML0 to ML5.	No top soil and Mineral reject has been generated. Backfilling and waste dumping as per proposal.	NIL.
4c	Number of dumps within lease area and outside of lease area	A total of around 47 waste dumps are within lease area.	A total of around 47 waste dumps are within lease area.	NIL.

4d	Location of dumps w.r.t. ultimate pit limit (Rule 16)	Outside UPL.	Outside UPL.	NIL.
4e	Number of active and alive dumps.	07 Dumps.	07 Dumps.	NIL.
4f	Number of dead dumps.	40 Dumps.	40 Dumps.	NIL.
4g	Number of dumps established.	40 Dumps.	40 Dumps.	NIL.
4h	Whether Retaining wall or garland drain all along dumps are there.	Proposal of retaining wall has been envisaged.	Retaining wall has been constructed.	NIL.
4i	Length of Retaining wall or garland drain all along dumps	60 Mtrs.	100 Mtrs.	NIL.
4j	Number of settling ponds	No proposal.	Not applicable.	NIL.
4k	Specific comments of inspecting officer on waste dump management	Backfilling along with waste dumping has been proposed.	Backfilling and waste dumping has been carried out as per proposal. Retaining wall and garland drain construct around waste dumps at necessary places.	No issue observed related to waste dumping.

#### Solid Waste Management - Backfilling:

Sl.No.	Item	Propasals	Actual work	Remarks
5a	Status of part or full extraction of mineral from mined out area before starting backfilling.	No proposal of part or full extraction of mineral during the RY.	Not applicable as no proposal.	NIL.
5b	Area under backfilling of mined out area	An area of 2.29 hectare proposed during the RY.	An area of 2.29 hectare has been backfilled during the RY.	NIL.
5c	Concurrent use of topsoil for restoration or rehabilitation of mineral out area (Rule 32)	No proposal of top soil removal.	No top soil patch encountered during mining.	NIL.

5d	Total area fully reclaimed and rehabilitated	No proposal of full reclamation and rehabilitation	Total of around 47.851 hectare area has been rehabilitated by the way of plantation.	NIL.
5e	General remarks of inspecting officers on backfilling and reclamation etc.	An area of 2.29 hectare proposed during the RY.	An area of 2.29 hectare has been backfilled during the RY.	Backfilling has been started over exhausted part of the mine pit (P3 lower).

Progressive Mine Closure Plan:

Sl.No.	Item	Proposals	Actual work	Remarks
6a	Whether Annual report on PMCP submitted on time and correctly. Rule 23 E(2).	As per rule 26 of MCDR, 2017 holder of mining lease shall submit PMCP.	PMCP report for the year 2020-21 has been submitted.	NIL.
6b	Area available for rehabilitation (ha) .	Waste Dump: 2.0 Hect and Waste land: 7.0 hect.	Waste Dump: 2.0 Hect and Waste land: 6.0 hect.	Violation of rule 11(1) of MCDR issued vide letter dated 28/12/2021 for shortfall in plantation area of waste land.
6c	afforestation done (ha).	Waste Dump: 2.0 Hect and Waste land: 7.0 hect.	Waste Dump: 2.0 Hect and Waste land: 6.0 hect.	Violation of rule 11(1) of MCDR issued vide letter dated 28/12/2021 for shortfall in plantation area of waste land.
6d	No. of saplings planted during the year	Waste Dump: 5000 nos and Waste land: 10000 nos.	Waste Dump: 3000 nos and Waste land: 12000 nos.	NIL.
6e	Cumulative no .of plants	No specific proposal on cumulative number of plantation.	Cumulatively 7.33 lacs of plants have been planted.	NIL.
6f	Any other method of rehabilitation	Other than plantation, no proposal of any other method of rehabilitation	Not applicable.	NIL.
6g	Cost incurred on watch and care during the year	Not specified.	25 lacs	NIL.



6h	Compliance on reclamation and rehabilitation by backfilling (i) Voids available for backfilling ( Lx B x D	2.29 Hectare.	2.29 Hectare.	Proposal as per approved document dated 22/01/2020.
6i	Compliance on reclamation and rehabilitation by backfilling (ii) Voids filled by waste / tailings	385953 Tons	308135 Tons	Proposal as per approved document dated 22/01/2020.
6j	Compliance on reclamation and rehabilitation by backfilling (iii)Afforestation on backfilled area	No proposal.	Not applicable.	NIL.
6k	Compliance on reclamation and rehabilitation by backfilling (iv) Rehabilitation by making water reservoir	No proposal.	Old exhausted pits have observed water logged.	NIL.
6l	Compliance on reclamation and rehabilitation by backfilling (v)any other specific means.	No any other specific proposal.	Not applicable.	NIL.
6m	Compliance of rehabilitation of waste land within lease (i)afforestation	Waste Dump: 5000 nos and Waste land: 10000 nos.	Waste Dump: 3000 nos and Waste land: 12000 nos.	NIL.
6n	Compliance of rehabilitation of waste land within lease (ii)Area rehabilitation (ha)	Waste Dump: 2.0 Hect and Waste land: 7.0 hect.	Waste Dump: 2.0 Hect and Waste land: 6.0 hect.	Violation of rule 11(1) of MCDR issued vide letter dated 28/12/2021 for shortfall in plantation area of waste land.
6o	Compliance of rehabilitation of waste land within lease (iii)Method of rehabilitation	Plantation.	Plantation.	NIL.

6p	Compliance of environmental monitoring (core zone and buffer zone)	Provision for monitoring of environment parameter has been given.	Environment monitoring is being carried out in core and buffer zone. Parameters are found to be within permissible limit.	NIL.
6q	General remarks of inspecting officers on PMCP compliance and progressive closure operations etc.	A total of 9.0 hectare area has been proposed for plantation with 15000 numbers of saplings.	A total of 8.0 hectare has been planted with 15000 number of saplings.	Violation of rule 11(1) of MCDR issued vide letter dated 28/12/2021 for shortfall in plantation area of waste land.

#### Mineral Conservation:

Sl.No.	Item	Propasals	Actual work	Remarks
7a	ROM Mineral dispatch or grade-wise sorting within lease area	No grade wise sorting within lease area.	Not applicable as no proposal of grade wise sorting. Entire ROM is usable.	NIL.
7b	Method of grade-wise mineral sorting i.e. manual or mechanical.	No grade wise sorting proposed.	Entire ROM is being used after crushing and screening.	NIL.
7c	Different grade of mineral sorted out at mines.	No grade wise sorting proposal.	Not applicable.	NIL.
7d	Any beneficiation process at mines	No proposal.	No beneficiation process other than crushing and screening.	NIL.
7e	General remarks of inspecting officer on Mineral conservation and beneficiation issues	No proposal of any beneficiation.	No beneficiation has been carried out. Entire ROM is being used after crushing and screening.	No issue observed related to mineral conservation.

#### Environment:

Sl.No.	Item	Propasals	Actual work	Remarks
8a	Separate removal and utilization of topsoil (Rule 32)	No proposal of top soil removal.	No top soil patch encountered during mining.	NIL.

8b	Concurrent use or storage of topsoil	No proposal of top soil generation during RY.	Not applicable as no top soil has been generated during RY.	NIL.
8c	Separate dumps for overburden, waste rock, rejects and fines (Rule 33)	Separate dumping for OB/waste. No rejects and fines generation.	OB/waste has been dumped separately.	NIL.
8d	Use of overburden, waste rock, rejects and fines dumps for restoring the land to its original use	Waste/OB has been proposed to backfill in mine out area of 2.29 Hect.	Backfilling has been carried out as per proposal during RY	NIL.
8e	Phased restoration, reclamation and rehabilitation of lands affected by mining operations (Pits, dumps etc)	An area of 2.29 hect proposed to backfill.	Backfilling carried out over 2.29 hect area.	NIL.
8f	Baseline information on existence of plantation and additional plantation done (Rule 41)	Total 15000 numbers of saplings have been proposed to plant.	Total 15000 numbers of saplings have been planted.	NIL.
8g	Survival rate	No proposal.	92 %	As per AR 2020-21.
8h	Water sprinkling on roads to control airborne dust	To control the air born dust particle, water sprinkling has been proposed.	Water sprinkling has been observed during the mine inspection.	NIL.
8i	General remarks of inspecting officer on aesthetic beauty in and around mines area	A total of 15000 numbers of saplings proposed to plant during 2020-21.	A total of 15000 numbers of saplings have been planted during 2020-21.	The general aesthetic beauty is satisfactory in and around mine area.

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**Compliance of Rule 45:**


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Sl.No.	Item	Propasals	Actual work	Remarks
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9a	Status of submission of Monthly and Annual returns	As per rule 45 of MCDR, 2017 monthly and annual return to be submitted to competent authority.	Monthly and annual returns have been submitted for the RY.	NIL.
9b	Scrutiny of Annual return for information on Mining Engineer, Geologist and Manager	Information on Mining Manager, Mining Engineer and geologist has been furnished.	Mining Engineer, Geologist and Manager has been appointed in the mine.	NIL.
9c	Scrutiny of Annual return on land use pattern for area under pits, reclaimed area, dumps etc.	Area under pits- 221.353 Hect. Reclaimed area- 47.851 Hect. Infrastructure - 223.37 Hect.	Error in land use data has been observed	Violation of rule 11(1) of MCDR issued for excess area degradation compared to RMP vide letter dated 28/12/2021.
9d	Scrutiny of Annual return on afforestation	Inside Lease: 15000	Inside Lease: 15000	NIL.
9e	Scrutiny of Annual return on mineral reject generation (Grade and quantity)	NIL.	No mineral reject has been generated.	NIL.
9f	Scrutiny of Annual return on ROM stock and/or graded ore	ROM Stock: NIL Graded Stock: NIL.	ROM Stock: NIL Graded Stock: NIL.	NIL.
9g	Scrutiny of Annual return on sale value, Ex. Mine price and production cost	Ex. Mine price and Cost of production: Rs. 287.67 per tones.	Error has been observed in the furnished information related to cost of mining and overhead cost.	Violation of rule 45(7) of MCDR issued vide letter dated 28/12/2021.
9h	Scrutiny of Annual return on fixed assets	Value of fixed asset has been furnished as Rs. 559139938/-	The information furnished appears to be in order.	NIL.
9k	Scrutiny of Annual return on mining machineries	Shovel, Back Hoe, Dumper, Rock Drill, Water tanker, Explosive Van etc.	Shovel, Back Hoe, Dumper, Rock Drill, Water tanker, Explosive Van etc.	NIL.

**Details of violations observed during current inspection and compliance position of violation pointed out**

Violation observed			Show couse position		
Rule NO.	Issued on	Compliance on	Rule NO.	Issued on	Compliance on
MCDR17	Rule 11(1)	24-DEC-21			
MCDR17	Rule 45(7)(a)	24-DEC-21			

**Date :**

**(DILIP JAIN)**

Indian Bureau of Mines