



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

Date: 13/01/2020
16

File No. MP/BGT/Mn.-144/ 165-168

To,
Sh. Harsh Trivedi (Director)
M/s A. P. Trivedi Sons,
Main Road, Ward no. 20
District- Balaghat, M.P.- 481001

To,
M/s A. P. Trivedi Sons,
Main Road, Ward no. 20
District- Balaghat, M.P.- 481001

Subject: Violation of provisions of Mineral Conservation and Development Rules, 2017, in respect to Inspection of Ramrama Mn Mine (43.086 Ha), M/s A. P. Trivedi Sons, Main Road, Ward no. 20, District- Balaghat, M.P.- 481001, Mine Code-40MPR01022.

Sir,
Undersigned has inspected your mine in the presence of Sh Harsh Trivedi (Director), Mr. V.A. Borkar (Agent), Mr. M.K. Choudhary (Mine Manager), Mr. Gaurav Khursange (Mining Engineer), Mr. Yajit Singh Bisen (Surveyor) on 11/12/2019. Following provisions of MCDR 2017 were found violated in your mines during inspection.

Rule No	Nature of violation observed in detail
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. The document of above mentioned mine was approved vide letter No.- BGT/MN/MPLN-126 /NGP dated 03/07/2015 incorporating proposal of working from 2015-16 to 2019-20.

During inspection it has been observed that the following provisions of the rule have been violated:-

- It was proposed to remove 83200 m3 OB in the year 2018-19. But, it was observed that only 72485 m3 OB generated in the year 2018-19. The mine- development was lagging from the proposal and not as per the approved proposals of approved document.
- In underground mine, as per approved document 84m vertical development between 272mRL to 286mRL was proposed. But, only 51m vertical development was achieved in the year 2018-19.
- Refer approved document, separate benches of less than 6m height shall be maintained in the openpit mine and bench widths at the mine shall not be less than the height of the benches at any place. But, during inspection it was found that in the northern side of the lease benches have been merged up some places near BP no. 34 to BP no. 36 and also between the grids E875 to E1100 and N1600 to N1700, resulting height of the benches found more than the proposed in approved document. And, it was also observed that at some places in the northern side between BP no. 34 to BP no. 36 width of the benches found very less than the height of the benches.

Rule 26(2) The holder of mining lease shall submit to the competent authority a yearly report as per the format specified by the Indian Bureau of Mines, before 1st day of July every year setting forth the extent of protective and rehabilitative works carried out as envisaged in the approved mine closure plan, and if there is any deviation, reasons thereof:
During scrutiny of the office records, it has been observed that the yearly report in respect of rule 26(2) of MCDR 2017 has not been submitted for the year 2018-19.

Rule 33 Copies of plans and sections to be submitted - The holder of mining lease shall on or before the 30th day of the June every year submit to the authorized officer, as the case may be, and the State Govt. a digital copy along with a print copy of the surface geological plans and sections maintained under rule 32.

During scrutiny of office records, it has been observed that no such copies plans and sections have been submitted by lessee at this office.

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,-

- (a) 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;

During the scrutiny following deficiencies have been observed in the annual return of 2018-19:-

- In the part- I, Lease area (surface area) utilisation as at the end of year (hectares) the item (iv) used for waste disposal is required to be clarified.
- The mine is in operation but dead rent of amount Rs 176000 has been paid.
- In part II-A, it has been stated that loan of amount 20000000 & 28965487 has been taken from Bank of Maharashtra & Eledwise Retail Finance Ltd respectively and paid interest of Rs. 7772882. Please clarify, whether these loans were taken in the name of the mine? Supporting documents may please be attached.
- In sec-3 of Part V, the Proved Mineral Reserve (111) is 832541 & Probable Mineral Reserve (121) is also 832541. Please clarify.
- In sec-4 of Part V, the cumulative OB/waste quantity disposed of in external dumps is shown "zero". Please clarify.
- In sec-4.3 of Part V, Stope preparation (meters), Tonnage of ore blocked for stopping (tonnes) and Quantity of waste removed (tonnes) is shown "zero". Please clarify.

Rule 55 (1) For the purpose of carrying out reconnaissance, prospecting or mining operations in accordance with these rules, -

- every holder of reconnaissance permit shall employ a whole-time geologist;
 - every holder of prospecting licence or a prospecting license-cum-mining lease shall employ a whole-time geologist and a part-time mining engineer;
 - every holder of a mining lease shall employ, in case of-
category 'A' mines, a whole-time mining engineer and a geologist;
category 'B' mines, a part-time mining engineer and a part-time geologist;
- Provided that in the case of fully mechanised category 'A' mines, the mining engineers and geologists shall have minimum five years of professional experience of working in a supervisory capacity in the field of mining.

It has been observed that whole time Mine Geologist has not been appointed for this lease area as per provisions of rule.

- In this connection, it is brought to your notice that the above violations constitute an offence punishable under Rule 62 of Mineral Conservation and Development Rules, 2017.
- The mining operations can be suspended under the rule 11(2) of MCDR-2017, if compliance of rule 11(1) of MCDR-2017 is not found satisfactory.
- You are advised to rectify the violations of abovementioned rules immediately and intimate the position to this office within 45 (Forty Five) days from the date of issue of this letter.

भवदीय,

(नरेश कुमार कटारिया)
उप खान नियंत्रक
भारतीय खान ब्यूरो

NOO:

प्रतिलिपि प्रेषित :

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

प्रतिलिपि प्रेषित :

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

(नरेश कुमार कटारिया)
उप खान नियंत्रक
भारतीय खान ब्यूरो

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