

I/11913/2023



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

File No.: -

Mine Code: - 38MPR18013 Scheme No.-11, Kamla Nehru Nagar  
Jabalpur, Dated: /06/2023

To,

**Shri Riju Jauhar ( Nominated Owner),**

M/s S.N.Sunderson &amp; Co.

Opposite S-1/56, Sector-1, Dadda Dham,

Post &amp; District Katni (M.P.)-483501

**Email [riju.jauhar@snsunderson.com](mailto:riju.jauhar@snsunderson.com)**

Sub. : Violation of provisions of Mineral Conservation and Development Rules, 2017,  
in respect to Badari Limestone & Dolomite Mine over an area of 5.04 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 14/06/2022 by the undersigned, accompanied by Shri Ajay Pandey, Agent Group of Mines and General Manager(W).

नियम	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),2021notified in Gazette of India vide dated 02/11/2021 The Rievew of Mining Plan of above mentioned mine was approved vide letter No.-MP/Katni/limestone/RMP-51/2021-22 dated 29/12/2021 incorporating proposal of working from 2022-23 to 2026-27. During the inspection it was found that following activities have been carried out with violating the approved proposals :- Exploration was not completed up to March,2023 against the proposal of one exploratory bore holes for 2022-23.
12(4)	In the case of existing mining leases, detailed exploration (G1 level) over the entire potentially mineralised area under the mining lease shall be carried out in the manner specified in the Minerals (Evidence of Mineral Contents) Rules, 2015 or the Atomic Minerals Concession Rules, 2016, as the case may be, within a period of five years from the date of commencement of these rules. Mining Lease was executed on 02/05/1977 and so far entire potential area has not been explored under G1 level, thus violation of rule exist in the mining lease.
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: -

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	<p>1. Part 111, Consumption of material</p> <p>i. For the production of 99029tonne limestone, Rs. 24945825/-had expend on diesel i.e at the rate of Rs.251/90 per tonne which appears not reasonable. Similarly electricity charges per tonne limestone reached Rs. 37/78 also appears on higher side.</p> <p>ii. As per furnished data for the dispatch of 116479.41tonne limestone payment of roylyt indicated as Rs. 8976000/- i.e. @ Rs. 77/06 per tonne which is not acceptable. Similarly Payment against both, royalty and dead rent have been shown on the return. Royalty and Dead Rent cannot be charged at a time. So information furnished in this regard needs correction.</p> <p>iii. There is no details about payment made towards NMET and DMF, which is not correct.</p> <p>2. Part - VI (Production , dispatch and stock ) and Sales/Dispatches effected for Domestic Consumption and for exports:-</p> <p>i. Grade wise dispatch of BF grade Limestone indicated under Grade wise production and dispatches table is 116479.41tonne whereas total quantity of BF grade limestone dispatched to different consignees during the year is indicated as 218721.7tonne. Thus there are ore accounting issues, need be clarified .</p> <p>ii. Mineral is also supplied to non-registered person/company/ firm.</p> <p>3. Part – VII Cost of production :-</p> <p>i. For the calculation of cost of production alongwith Rs.80.00 per royalty, Rs. 0.12 per tonne dead rent has also been taken in to account which is completely incorrect.</p> <p>ii. Mining cost is taken as Rs 100.00 per tone. As per data given in return total cost of components of mining costs ( labour and supervision cost &amp; material cost ) comes about Rs. 321.92per tonne. Thus mining cost indicated here does not match with the total of its ingredients.</p>
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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.

Yours faithfully,

(Raghubir Sharan Garg)  
Assistant Controller of Mines  
For Regional Controller of Mines

Copy to:

- 1- The Director of Geology & Mining, Govt. of Madhya Pradesh, Khanij Bhavan, 29-A, Arera Hills, Bhopal (M.P.)
- 2- The District Collector, Katni (M.P.) for information & appropriate action.

Assistant Controller of Mines  
For Regional Controller of Mines

NOO Copy to: \_

- 1- Controller of Mines(CZ) for kind information.
- 2- DDG, Mining & Mineral Statistics Division, Indian Bureau of Mines, Nagpur for refer back of Annual Return for the year 2021-22 to rectification as pointed out above under rule 45(7).

Assistant Controller of Mines  
For Regional Controller of Mines