

Government of India
Ministry of Environment, Forest and Climate Change
(Forest Conservation Division)

Indira Paryavaran Bhawan,
 Jor Bag Road, Aliganj,
 New Delhi – 110003
Dated: June, 2023

To,

The Principal Secretary (Forests),
 Government of Madhya Pradesh,
 Bhopal.

Subject: Diversion of 166.41 ha forest land (150.31 ha Reserve Forest and 16.10 ha Protected Forest) in the forest compartment No. RF-720, RF-721 & PF-720-B of Parasia Range under West Chhindwara Forest Division for the Mahadeopuri Underground Coal Mining Project in favour of M/s Western Coalfield Limited (WCL) in Chhindwara District of Madhya Pradesh State (Online No. FP/MP/MIN/37580/2018) – regarding.

Madam/Sir,

I am directed to refer the PCCF (LM) and Nodal Officer, FCA, 1980, Govt. of Madhya Pradesh letter No. dated forwarding a fresh proposal on the above subject seeking prior approval of the Central Government under Section-2 of the Forest (Conservation) Act, 1980. After examining the proposal, the following shortcomings have been observed:

- I. The Government of Madhya Pradesh vide their letter No. F-1/828/2021/10-11/1942 dated 12.05.2023 forwarded the proposal for diversion of 166.41 ha forest land for Mahadeopuri under-ground coal mining project as a fresh diversion proposal without any reference to the renewal of the existing mine, whereas, the user agency has mentioned that an area of 865.824 ha including 1.832 ha surface rights has already been diverted. The above variation needs clarification and the copies of approval granted under Forest (Conservation) Act, 1980 along with status of compliance of the stipulated conditions therein shall be submitted.
- II. It has been noticed that the forest clearance for the instant proposal was valid for 30 years i.e. up to 02.02.2019 and the same has not been applied for renewal on time, which amounts to violation of the Forest (Conservation) Act, 1980. The State Govt. shall examine the matter and submit detailed report along with the present status of mine.
- III. The State Govt. shall submit the status of Mine lease validity along with the relevant details.
- IV. The status of balance 699.414 ha forest land out of earlier approved 865.824 ha forest land shall be intimated by the State Govt.
- V. The State Govt. has mentioned tree enumeration details as Nil whereas 1.832 ha has been proposed for surface use. Therefore the tree enumeration details for the surface rights shall be submitted.
- VI. The Environmental clearance (EC) dated 17.05.2007 as submitted against instant proposal is for Mahadeopuri underground coal mine project wherein it has been mentioned that total lease area is 172.87 ha out of which 170 ha is forest land whereas as per the records submitted, entire lease comprising 865.824 ha is forest land. Therefore the above variation needs clarification and it may be clarified whether the instant proposed area 166.41 ha was earlier included in the EC or otherwise.
- VII. The Cost Benefit analysis is required to be submitted as per the format prescribed in the FCA, 1980 Handbook of guidelines dated 28.03.2019 keeping in view the revised rates of NPV dated 06.01.2022.

- VIII. The Mining plan was approved in the year 1986. Hence, the relevance of the same in view of the technological advancement in the subsequent years and the mining operations which might have been undertaken is required to be examined. The State Govt. shall examine the matter and submit an approved revised Mining plan along with Progressive mine reclamation/ closure plan.
- IX. 3D subsidence report in respect of Mahadeopuri UG mine has not been submitted along with the Proposal. The same shall be uploaded/ submitted.
- X. High resolution satellite imagery shows that the plantations have been carried out in the proposed forest land for diversion. The details of the plantation activities shall be provided by the State Government.
- XI. High resolution satellite imagery shows that two nullahs are flowing through the forest land proposed for diversion and also a minor tank is located adjacent to the proposed forest land for diversion. In this regard the comments of the Water Resource Department of the State/State Government on the effect of underground mining on ground water recharge and existing water tank and measures to protect river subsidence due to underground mining shall be submitted. The details of any study done in this regard shall also be submitted.
- XII. A comprehensive KML file along with layout plan for 865.824 ha forest land showing the component wise utilization of the forest land, area proposed to surrendered(if any) by the user agency, area applied for renewal/diversion and 1.832 ha proposed for surface rights shall be submitted/ uploaded.
- XIII. A Coal washery/ processing plant also exist within the Mine lease boundary and the same has been shown as WCL land in DGPS map. However, the said washery has not been included completely in Mine lease KML boundary uploaded on PARIVESH. The same needs examination.
- XIV. The State Government has intimated that the CA is not applicable in the instant proposal. However the details of CA land against 1.832 ha surface use has been uploaded in online Part-II. Therefore the factual position of CA land shall be clarified.
- XV. There is non-forest land available in the vicinity, the State shall therefore explore to locate the non-site specific components proposed for surface rights on non-forest land.
- XVI. The details of the transportation plan for the minerals to be excavated shall also be submitted.

Accordingly, it is requested to furnish the above mentioned information to this Ministry for further consideration of the proposal.

Yours sincerely,

Signed by
Suneet Bhardwaj

Date: 26-06-2023 12:58:20

Sd/-
(Suneet Bhardwaj)
Assistant Inspector General of Forests

Copy to:

1. The PCCF (HoFF), Department of Forest, Government of Madhya Pradesh, Bhopal;
2. The Regional Officer, Integrated Regional Office, MoEF&CC, Bhopal;
3. The Nodal Officer (FCA), Department of Forest Government of Madhya Pradesh, Bhopal;
4. User Agency;
5. Monitoring Cell, FC Division, MoEF & CC, New Delhi for uploading on PARIVESH portal.