



NEW MEXICO ENVIRONMENT DEPARTMENT

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Mr. Michael Neumann
Manager, New Mexico
Roca Honda Resources, LLC
4001 Office Court Dr.
Santa Fe, NM 87501
PS Form 3800, August 2006

September 10, 2014

Michael Neumann
Manager, New Mexico Operations
Roca Honda Resources, LLC
4001 Office Court Dr., Suite 107
Santa Fe, NM 85707

RE: Roca Honda Mine/DP-1717—Comments on “Work plan for evaluation of the potential effects of discharge along the Rio San Jose” (August 2014)

Dear Mr. Neumann:

The New Mexico Environment Department (NMED) provides the following comments on the above-referenced document that was submitted by Roca Honda Resources, LLC (RHR).

Table with 4 columns: Comment no., Page, Quoted text, Comment. Row 1: Comment no. 1, Page 4, Quoted text: San Mateo Creek received discharge from various uranium mines... Comment: Since ephemeral surface flow in San Mateo Creek joins the Rio San Jose (RSJ) near the proposed discharge location, this study also should determine if similar concerns are warranted for the Rio San Jose. Row 2: Comment no. 2, Page 5, Quoted text: Samples will be collected...at two depths: 0.5 and 1.5 feet below streambed surface. Comment: Please explain the rationale for these proposed sample depths, and present any available information about the range of alluvial thickness along the RSJ.

Mr. Michael Neumann, Roca Honda Resources, LLC
 RE: Roca Honda Mine/DP-1717—Comments on “Work plan for evaluation of the potential effects of discharge along the Rio San Jose” (August 2014)
 September 10, 2014

Comment no.	Page	Quoted text	Comment
			At least one additional sample should be collected at the base of the alluvial sediments if no ground water is encountered.
3	5	One of the sample locations is at the USGS gaging station 08343000 and another is at the former discharge location of the city of Grants wastewater treatment facility.	Please identify these locations on Figure 2-1 (NMED acknowledges that the USGS gaging station location is shown on Figure 1-1). Please explain the rationale for the proposed two adjacent locations west of the “final sample location.”
4	8	The three sample locations used for sediment organic analysis will be used for organic analysis in the three ground water samples...	From this statement, MECS infers that RHR proposes to analyze only three sediment and co-located ground water samples for organic constituents. Please explain how these three locations will be determined, and why these three locations would suffice to characterize the organic chemistry profile of the sediments and ground water.

Please provide a response to these comments within 30 days of your receipt of this letter. You may contact me by telephone at (505) 476-3777 or by email at david.mayerson@state.nm.us if you have any questions.

Sincerely,



David L. Mayerson
 Mining Environmental Compliance Section
 Ground Water Quality Bureau
 New Mexico Environment Department

Copy:
 Kurt Vollbrecht, NMED