State of New Mexico
Energy, Minerals and Natural Resources Department

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 29, 2017

Mr. Thomas L. Shelley, Reclamation Manager
Freeport-McMoRan Tyrone Inc.
P.O. Box 571
Tyrone, New Mexico 88065

RE: Additional Comments on Closure/Closeout Plan Update – June 11, 2015, Permit No. GR010RE, Tyrone Mine

Dear Mr. Shelley:

The New Mexico Mining and Minerals Division ("MMD") received a submittal titled, "Freeport-McMoRan Tyrone Inc. Tyrone Mine Closure/Closeout Plan Update, Permit Nos. GR010RE and DP-1341" ("Tyrone Updated CCP"), dated June 11, 2015, from Freeport-McMoRan Tyrone Inc. ("Tyrone"). The Tyrone Updated CCP included changes made to the proposed updated closure/closeout plan for the Tyrone Mine, dated July 15, 2013, based on comments by MMD and the New Mexico Environment Department ("NMED").

MMD has reviewed the Tyrone Updated CCP and has the following comments:

1. Section 1.3.2, Closeout Plan Constructs, page 3 – states, *"The current approved conditional waiver area is depicted on Figure 3R of Revision 10-1 to Permit No. GR010RE (MMD, 2012). This update takes into account conditional waivers approved by MMD."* Plate 1, and Appendix A, Reclamation Design Drawings - Drawings 2, 3, 12, 13, 14 and 34 in the Tyrone Updated CCP, delineates the waiver boundary for the Copper Mountain Pit area as being contiguous with the waiver area of the Main Pit area. The current conditional waiver area reported by Tyrone in the annual Stockpile and Open Pit Waiver Update dated August 31, 2017 does not show the Copper Mountain pit waiver area to be contiguous with the Main pit waiver area. MMD requests that Tyrone provide an assessment of how the additional waiver area depicted in Plate 1 qualifies for the waiver pursuant to § 19.10 5.507.B NMAC and Section E.1.5 of Revision 10-1 to Permit No. GR010RE.

2. Section 1.5, Description of Updated Pan, page 7 – states, *"This updated CCP supports financial assurance cost estimate for closure/ closeout based on the EOY 2014 mine plan."* Please confirm that the EOY 2014 remains the year with the greatest volume of regrading and cover placement and results in the highest financial assurance requirements applicable

to the Tyrone Updated CCP. Otherwise, please project the year between 2014 and 2022 when the highest reclamation costs will occur.

3. Section 2.3.7, Material Characteristics, page 28 – states, *"Tyrone believes the results of reclamation and test plot studies will provide additional information on the adequacy of these materials for cover."* In June 2015, Tyrone completed construction and seeding of revegetation and erosion test plots at the USNR reclamation area to test the material proposed by Tyrone for reclamation at the Little Rock Mine and the Tyrone Mine that is being excavated from the Little Rock Mine and placed at the 9A and 9AX waste rock piles at the Tyrone Mine. MMD anticipates the results of these test plot studies will determine the suitability of the material from the Little Rock Mine as a revegetation and erosion resistant cover material.

4. Section 3.1.5, Tailing Launder, page 34 and Table 3-1, Status of Reclamation and Financial Assurance Reduction at the Tyrone Mine – Tyrone indicates that the reclamation of the tailing launder would be completed in 2014. Please provide an update on the status of the tailing launder reclamation including the re-establishment of the associated watershed drainages that the tailing launder crosses.

5. Section 3.2.7, Impacted Soils and Tailings Pipeline In and Around the Tailing Thickeners, page 37 – states the reclamation activities in the vicinity of the tailing thickeners including the consolidation of tailing and other mining impacted materials, closing of the remaining tailing pipeline and launder, grading, installation of stormwater controls, cover and revegetation was projected to be completed by EOY 2014. Please provide an update on the status of the reclamation of this area.

6. Section 4.1.2, Stockpiles, page 40 – states, *"Additionally, as part of this CCP update, Tyrone has included a new leach stockpile that will be constructed within the Savanna Pit by EOY 2014. This facility, referred to herein as the 'Savanna Pit Stockpile', is projected to cover an area of approximately 172 acres and is identified as a conditionally waived facility on this CCP."* Please update the status of the Savanna Pit Stockpile and provide an assessment of how this stockpile qualifies for a conditional waiver as required by Section E.1.5 of Revision 10-1 to Permit No. GR010RE.

7. Section 4.1.3, Open Pits, page 41 – states that the San Salvador Pit is projected to be partially backfilled at the EOY 2014 and the South Rim Pit is projected to be fully backfilled. Please provide the current backfill status of these open pits.

8. Section 4.1.7, Industrial Facilities, page 43 – Section 9.I.1 of Revision 01-1 to Permit No. GR010RE requires, in part, that Tyrone provide MMD with a building inspection certificate signed by a professional engineer, that the industrial PMLU buildings meet applicable building codes, are structurally sound, meet all zoning requirements and ordinances, are have operating utilities. The certification is required to be renewed every five (5) years. The last renewal certificate for Tyrone was received by MMD in 2013 and the next renewal certificate will be due in 2018. MMD intends to continue this requirement together with the other requirements of Section 9.I.1 of Revision 01-1 regarding the industrial PMLU at the Tyrone Mine for Revision 09-1.

Tyrone provided a letter, dated November 19, 2002, from the Silver City-Grant County Economic Development Corporation "(SIGRED") supporting Tyrone's proposal for retaining selected buildings at the Tyrone Mine for an industrial PMLU. At this time, MMD requests confirmation from SIGRED or an equivalent organization of the current need for retaining the buildings at the Tyrone Mine for an industrial PMLU.

9. Section 4.2.2, Stockpiles, Stockpile Erosion and Drainage Control, page 44 – states, *"For the stockpile top surfaces located outside the OPSDA, the surfaces will be graded and covered (with the exception of the 9A overburden stockpile which will not require imported cover) to direct non-impacted water to designated discharge areas."* The 9A overburden stockpile is composed of overburden mined at the Little Rock Mine. Currently, this material is being tested as a vegetation and erosion resistant cover material at the Tyrone/Little Rock USNR test plots. The results of this study will determine, in part, the suitability of this material as a vegetative cover and will impact whether or not the 9A overburden stockpile will require additional cover material to meet the revegetation and erosion requirements of Permit No. GR010RE.

10. Section 4.2.2, Stockpiles, Stockpile Cover and Revegetation, pages 45-46 – states that the cover material requirement for the Mining Area at the Tyrone Mine is approximately 12.8 million cubic yards based on the current permit requirements, that more than 20 million cubic yards of Gila Conglomerate and leached cap cover materials have been identified at the Tyrone Mine, and that for the Tyrone Updated CCP the assumed borrow sources for stockpile cover material are the in-situ Gila Conglomerate in the Lube Shop (Savanna Stockpile) area and from the 5A overburden stockpile. The Preliminary Borrow Source Materials Investigation ("PBSMI"), dated October 31, 2005, and the Supplemental Borrow Materials Report ("SBMR"), dated January 31, 2006, provide chemical and physical properties of the Gila Conglomerate and leached cap borrow materials in selected locations at the Mining Area. Table 8, Borrow Source Volumetrics Mine/Stockpile Unit, and Plate 2, Potential Gila Conglomerate Borrow Sources Tyrone Mine/Stockpile Unit of the PBSMI provide the estimated volumes of Gila Conglomerate (and leached cap from the Copper Mountain open pit) available as cover material. Table 8 of the PBSMI indicates that approximately 5.2 million cubic yards of Gila Conglomerate cover material would be obtained at the southern portion of the 5A overburden stockpile. However, due to uncertainty in the exact location of potentially acid generating waste rock located in the 5A overburden stockpile a quality assurance/control plan and a material handling plan is required to assure that no acid generating material is excavated from this stockpile for use as cover material. In addition, the PBSMI does not provide a volumetric estimate of the Gila Conglomerate cover material at the Lube Shop area and only provides the chemical and physical analysis data from three samples of Gila Conglomerate obtained from the Main Pit wall in the vicinity of the Lube Shop area. MMD believes that additional information on the characteristics and quantity of Gila Conglomerate from the Lube Shop area is needed. Please provide additional information, if available, on the chemical and physical properties of the Gila Conglomerate found in the Lube Shop area and provide an estimate of the volume of the Gila Conglomerate available as cover material from this area.

In addition, Borrow Source A identified in the PBSMI has since been covered by the 9A and 9AX waste rock stockpiles, probably making it unavailable as a source of Gila Conglomerate cover material, and since the No. 1 stockpile has been reclaimed and it is offset from the rest of the Mining Area, Borrow Source E may no longer be a practical source of cover material. MMD is concerned that the sources and volumes of Gila Conglomerate cover material for reclamation at the Mining Area are less than the estimates provided in the PBSMI and may not be sufficient to meet the reclamation requirements at the Mining Area. Tyrone should provide an update to the PBSMI and SBMR to re-confirm that there is sufficient Gila Conglomerate cover material available for reclamation of the Mining Area. The approval by MMD of leached cap material (quartz monzonite and Precambrian granite) proposed by Tyrone for use as cover material is largely dependent on the results of the test plot studies for the Tyrone and Little Rock mines, respectively. These studies are currently incomplete or are in progress and at this time only Gila Conglomerate will be considered as cover material for the purposes of the Tyrone Updated CCP.

11. Section 4.2.6, Borrow Areas, page 49 – Borrow areas that are reclaimed in accordance with the requirements of Seeding Methods and Revegetation Standards (currently Appendix C of Revision 01-1, Permit No. GR010RE) are considered "Reclamation" as defined in § 19.10.1.7.R(1) NMAC and are subject to the current Post-Closure Monitoring and Maintenance requirements of Section 9.N of Revision 01-1 to Permit No. GR010RE. MMD requires that the reclaimed borrow areas meet the requirements of Post-Closure Monitoring and Maintenance for Revision 09-1.

12. Section 4.3.3, Management and Treatment Processes, page 51, bullet #3 – states that stockpile surfaces and outslopes located outside of the Open Pit Surface Drainage Area ("OPSDA") excluding the overburden stockpiles such as the 9A stockpile will be covered with 36 inches of suitable borrow material. The assumption that the 9A overburden stockpile will be reclaimed without additional cover material has not yet been confirmed. The suitability as a vegetative cover material of the leach cap overburden (Precambrian granite) excavated from the Little Rock Mine and placed on the 9A (and 9AX) stockpile will be, in part, determined by the results of the ongoing Tyrone/Little Rock USNR test plot study. See comments #3 and 10 above.

    In addition, the term, "Conditional Waiver Area", refers to the area approved by MMD that is similar to, but distinct in a number of locations from the OPSDA, that is related to NMED Discharge Permit DP-1341, in the Tyrone Updated CCP.

13. Section 5.2.1, Stockpiles Located Outside the OPSDA, page 58, bullet #1 – states that the 9A stockpile is excluded from the stockpiles that will have the top surfaces and slopes covered with imported cover material. See comment #12 above.

14. Section 5.2.2, Stockpiles Located Inside the OPSDA, Stockpile Facilities to be Closed, page 58-59 – states that the proposed conditional waiver area associated with the EOY 2014 mine topography is shown in Plate 1. See comment #1 above.

15. Section 5.2.2, Stockpiles Located Inside the OPSDA, Stockpile Facilities to be Closed, page 58-59 – states the *"Future Savanna Pit Stockpile"* is shown on Plate 3. Plate 3 shows a Savanna Stockpile located to the north of the Lube Shop and to the northeast of the Savanna Pit, outside the conditional open pit waiver area, however, does not show a Future Savanna Pit Stockpile. A Savanna In-Pit Stockpile is shown in drawings in Appendix A, Reclamation Design Drawings, of the Tyrone Updated CCP. Please confirm that the Savanna In-Pit Stockpile shown in these drawings is the same as the Future Savanna Pit Stockpile.

16. Section 5.2.3, Open Pits (Non-Waiver Areas), page 60 – states that the San Salvador Pit is projected to be partially backfilled and the South Rim Pit is projected to be completely backfilled by EOY 2014. Please update the backfill status of these open pits.

17. Section 5.4, Borrow Areas, pages 66-67 – see Comments #3 and 10 above.

18. Section 6.3, Revegetation Success Monitoring, page 70 – states that revegetation success, *"will be monitored according to Section 9.N.2 of Revision 01-1 of the MMD Permit and more current permit modifications (e.g., permit modification 10-1 and 12-1)..."*. MMD approved Modification 12-1 on April 24, 2015 that discontinued the requirement of the test plot studies for the Tyrone Mine for mobility of metals through the cover profile. Permit Modification 10-1 would, in part, change the timing of the quantitative vegetation monitoring events from year three (3) and two (2) of the last four (4) years of the twelve (12)-year time period for establishment of vegetation after the last year of augmented seeding to a qualitative vegetation monitoring event in year 3 and quantitative vegetation monitoring in 2 of the last 4 years, no earlier than year eight (8), of the 12-year vegetation establishment period. MMD has not completed processing of Modification 10-1 and intends to incorporate the changes requested in the Tyrone application for Modification 10-1 as part of Revision 09-1 for the Updated Tyrone CCP.

19. Section 6.4, Wildlife Monitoring, page 70 – states that Tyrone is complying with the wildlife monitoring work plan for the reclaimed areas that was approved by MMD in 2006. Since 2006, MMD approved a revised wildlife monitoring schedule for the Little Rock Mine (Section 8.R.2 of Revision 14-1, Permit No. GR007RE). The revised wildlife monitoring schedule for the Little Rock Mine, in part, includes beginning the deer pellet counts and bird diversity surveys in year six (6) after seeding instead of after year three (3) after seeding and in two (2) consecutive out of the last four (4) years prior to release of financial assurance instead of every year starting in year 3 after seeding. In addition, for the Little Rock Mine the bird diversity surveys are conducted twice per year (winter and spring) and the deer pellet counts once per year. As part of the Updated Tyrone CCP, MMD intends to change the requirements of Section 9.N.3 of Revision 01-1 to be consistent with the wildlife monitoring requirements of the Little Rock Mine permit.

20. Section 6.6, Adjustment of OPSDA, page 71 – states that Tyrone will submit updated maps showing the conditionally waived areas to MMD each year by August 30th. MMD has been receiving the updated conditional waiver maps as required by Revision 10-1. In addition to the updated maps of the conditionally waived areas, Revision 10-1 requires and Tyrone has provided an assessment of how the updated stockpile slopes and open pit areas

qualify for a conditional waiver pursuant to 19.10.5.507.B NMAC. In the future, this will continue to be a requirement of Permit GR010RE.

21. Section 6.7, Construction Quality Assurance Plan, page 71 – Reference is made to Condition 9.G.3(a) of Revision 10-1 of the MMD Permit. *"Revision 10-1"* should be "Revision 01-1" in the context of this section. In addition, Construction Quality Assurance Plan ("CQAP") has been replaced in this section with *"Final Design"*. While detailed engineering designs addressing slopes, erosion controls and stormwater management structures are required by Section 9.G.3(a) of Revision 01-1, in previous reclamation projects at the Tyrone Mine (e.g., the Tyrone tailing impoundment reclamation) the final engineering design has been submitted by Tyrone after the MMD approval of the CQAP. Please explain the reason for replacing the CQAP with the Final Design.

22. Section 7.3, Industrial Post-Mining Land Use, pages 73-74 - states that, *"Although the industrial PMLU will continue the existing type of use, the specific industry will change."* Please explain what is meant by, "*the specific industry will change"* for the industrial PMLU.

23. Section 7.3, Industrial Post-Mining Land Use, page 74 – bullet #3 states that a structural removal plan will be submitted to the NMED at least 60 days prior to any structure removal or demolition. Tyrone should also submit the structural removal plan to MMD at least 60 days prior to any structure removal or demolition.

24. Section 7.4, Site-Specific Revegetation Success Guidelines, pages 74-76 – indicate that the approved *"guidelines"* for revegetation success that apply to the Tyrone Mine are discussed in sections 7.4.1 through 7.4.3. Appendix C of Permit Revision 01-1, in part, provides Vegetation Success Standards for Canopy Cover, Shrub Density and Plant Diversity. The vegetation success standards for the reclamation at the Tyrone Mine were developed in consideration of the Mining Act Reclamation Program ("MARP") Closeout Plan Guidelines, April 1996. Therefore, the term "guidelines" should be changed to "standards" as they apply to the standards for vegetation success under the Tyrone Updated CCP.

    The *"Plant Diversity"* section should be listed as section 7.4.3 in the Tyrone Updated CCP.

    Under the *"Plant Diversity"* section and in Table 7-4 of the Tyrone Updated CCP Tyrone proposes to change the numerical standard of perennial cool season grasses from two (2) to one (1). Tyrone has indicated to MMD in past vegetation monitoring reports for the Tyrone Mine that the cool season grasses have been rarely observed at the reclaimed areas and at the reclamation reference area. MMD is aware of this issue and will consider the change proposed by Tyrone for the Plant Diversity Success Standard for the cool season grasses. Tyrone also states that the intermediate-season grass, plains lovegrass, should be considered the functional equivalent of a cool-season grass. MMD will also consider recognizing plains lovegrass as a cool season grass for the purposes of the Plant Diversity Success Standard for the Tyrone Updated CCP.

Tyrone discusses the concept of colonization of the vegetation at the reclaimed areas by volunteer plant species. At this time, there is no colonization revegetation standard for the reclamation at the Tyrone Mine. However, in the past MMD has accepted the inclusion of non-weedy plant species that have colonized the reclaimed areas in the revegetation surveys for the Tyrone Mine.

25. Section 8.1, Capital Cost Estimates, page 78 – The Capital Cost Summary Table notes that the Total Indirect Costs of 22.5% are applied to the Earthwork and Water Treatment Capital Direct Costs pursuant to MMD (1996) and Office of Surface Mining ("OSM") guidance. The MMD Guidance for Calculating Capital Indirect Costs for Mine Reclamation and Closure Cost Estimates, November 2016 ("Indirect Cost Guidance"), has updated the MARP Closeout Plan Guidelines regarding the calculation of indirect costs for closeout plan cost estimates. MMD is concerned that the Tyrone Updated CCP underestimates the indirect costs for the Earthwork and Water Treatment Capital Cost Summary. MMD received comments from Tyrone on the Indirect Cost Guidance in a letter, dated May 31, 2017, and has since engaged Tyrone in discussions on the Indirect Cost Guidance and the closure/closeout plan cost estimate for the Continental Mine. To date, these discussions have not resolved this issue. To aid in resolution of this issue, MMD is currently planning to have the closure/closeout plan cost estimate for the Continental Mine reviewed by a third-party contractor pursuant to §19.10.12.1201.D NMAC. MMD is also planning to have the cost estimate for the Tyrone Updated CCP reviewed by a third-party contractor.

26. Section 8.3, Operation and Maintenance Cost Estimates, page 79-80 – The Earthwork Operations and Maintenance ("O & M") Cost Summary notes that the Total Indirect Costs of 17.5% are applied to the Earthwork O & M pursuant to MMD (1996) and Office of Surface Mining ("OSM") guidance. The MMD Indirect Cost Guidance has updated the MARP Closeout Plan Guidelines regarding the calculation of indirect costs for closeout plan cost estimates. MMD is concerned that the Tyrone Updated CCP underestimates the indirect costs for the Earthwork O & M Cost Summary. See Comment #25 above.

27. Section 8.3.2, Water Treatment, page 80 – The Water Treatment O & M Cost Summary notes that the Total Indirect Costs of 14% are applied to the Water Treatment O & M. The MMD Indirect Cost Guidance has updated the MARP Closeout Plan Guidelines regarding the calculation of indirect costs for closeout plan cost estimates. MMD is concerned that the Tyrone Updated CCP underestimates the indirect costs for the Water Treatment O & M Cost Summary. See Comment #25 above.

    In addition, Section 8.3.2 states, "Further details on the water treatment system and the associated cost estimates are provided in Appendix D." Appendix D, Section 4.4, Total Cost Estimate for the Water Management states, *"Indirect O&M costs of $14,762,860 were calculated at 14 percent of the direct O&M cost, excluding electrical power and reagent cost."* Please provide a table showing a breakdown of the water treatment O&M indirect cost percentages for Mobilization and Demobilization, Contingencies, Engineering Redesign Fee, Contractor Profit and Overhead, Project Management Fee, and State Procurement Cost in the same way as shown on Worksheet #21, Operations and Maintenance Summary, page 4 of 4, of Appendix A, Earthwork Cost Estimate, Cost Calculation Summaries, found within Appendix C, Earthwork Cost Estimate Summary

Report, of the Tyrone Updated CCP. Please provide the rationale for each of the indirect cost percentages provided in the requested table.

28. Table 4-2, Summary of Key Design Criteria for Facilities to be Closed – Bullet 9 under Stockpile Regrading Outside OPSDA section states, "Top surfaces and outslopes to be covered with 36 inches of Gila Conglomerate (or other suitable material; the 9A overburden stockpile may be used as borrow material and is not projected to require imported cover). See Comment #12 above.

29. Appendix A, Reclamation Design Drawings - Drawings 22, 23, and 24 – show the 5A overburden stockpile grading and drainage plan, cut/fill isopach map, and cross-sections. Please confirm that these drawings show the regrading of the 5A stockpile after removal of Gila Conglomerate overburden material from the stockpile that will be used for the Mine Area reclamation.

30. Appendix A, Reclamation Design Drawings – Drawing 34, Haul Route Map – does not show a Centroid of Reclamation Area or a reclamation haul road to the 9A overburden stockpile. Appendix B, Facility Characteristic Forms, and Appendix C, Earthwork Cost Estimate Summary Report, do not include placement of Gila Conglomerate cover material on the 9A stockpile. The cost estimate should include hauling and placement of Gila Conglomerate cover material on the 9A stockpile.

Comments on Appendix C, Earthwork Cost Estimate Summary Report:

31. Facility Equipment Demolition - Tyrone needs to itemize all equipment in the Mine Maintenance Facilities Area, SX-EW Plant Area, Lubrication Shop Area, Acid Unloading Facility & Former Precipitation Area, and Mill & Concentrator Area and provide a cost for their removal and disposal. The value of the equipment should not factor in to the cost estimate of removal and disposal. The only language found in the Tyrone Updated CCP that addresses this issue states, *"All equipment and above-grade structures will be demolished and removed from the area or buried."*

    Also, the unit cost to demolish structures based on the RS Means book should be updated. The cost in 2012 apparently was $0.27 per cubic foot. The latest version of RS Means shows this unit value to be $0.30 per cubic foot.

32. Material Factor for Dozer Pushing - All dozing in the cost estimate uses a Material Factor of 1.2. This factor is appropriate when grading topsoil over the final contoured surface. The Material Factor for regrading waste rock piles should be no greater than 1.

33. Equipment Cost - The *Equipment Watch* rates are dated July 2012. Please update the rate of equipment usage with 2017 data. Any deviation from the Standard Value issued by *Equipment Watch* should be explained and documented.

34. Diesel Fuel - The price of diesel fuel used in the 2012 cost estimate is $3.13 per gallon (delivered). The current price may be lower.

35. Digital Mapping Files – The MMD analysis of the cost estimate and Tyrone Updated CCP would benefit from having the AutoCAD files upon which the PDF maps are based. This also applies to the GIS maps. Please submit to MARP the AutoCAD and GIS files for which the PDF maps submitted in the CCP are produced from. FMI tentatively agreed to provide such electronic files in meeting with MMD in March 2017.

36. Indirect Costs - Tyrone proposes 22.5% in Indirect Costs, in addition to the Direct Costs. Indirect Costs are intended to capture expected costs not identified as part of the Direct Costs. Some examples of items not identified in the Direct Costs include construction supervisors of equipment operators and laborers, contractor office infrastructure and utilities, stand by fees, health insurance of contractor employees, surveying, permitting, performance and payment bonding, liability insurance, and oversight and operations by state government staff.

	Tyrone Proposed	Based on MMD Indirect Guidance (2016)
Mob./Demob.	1.0%	2%
Contingency	2.0%	10%
Engineering Redesign	2.5%	2.5%
Profit and Overhead	15%	15%
Project Management	2.0%	5%
State Procurement	0%	1.5%
Contract Administration	0%	1%
Total	22.5%	37%

In addition, Tyrone proposes a 5% reduction in the Profit & Overhead portion of the Indirect Costs for the Operations and Maintenance ("O&M") section of the cost estimate. The reason given is, *"to account for the long-term contract and repetitive annual work."* The State of New Mexico is not allowed to enter into long-term contracts and would most likely pay the same Profit & Overhead for O&M as they would for Earthmoving. State contracts typically have a maximum three-year term.

Please respond to this letter within 60 days of receipt. The response may be in letter format. Re-submittal of the Tyrone Updated CCP is unnecessary.

Please contact me at 505-476-3432 or at David.Ohori@state.nm.us if you have any questions.

Sincerely,

David Ohori, Permit Lead
Mining Act Reclamation Program ("MARP")

cc: Holland Shepherd, Program Manager, MARP
Lynn A. Lande, Chief Environmental Engineer, Tyrone
Keith Ehlert, NMED Mining Environmental Compliance Section
Mine File (GR010RE)