



**MICHELLE LUJAN GRISHAM**  
Governor

**HOWIE C. MORALES**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

*Ground Water Quality Bureau*  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, New Mexico 87502-5469  
Phone (505) 827-2900 Fax (505) 827-2965  
[www.env.nm.gov](http://www.env.nm.gov)



**JAMES C. KENNEY**  
Cabinet Secretary Designate

**JENNIFER J. PRUETT**  
Deputy Secretary

**MEMORANDUM**

To: Holland Shepherd, Program Manager, Mining Act Reclamation Program

Through: Kurt Vollbrecht, Manager, Mining Environmental Compliance Section

From: Jeff Lewellin, Mining Act Team Leader, Mining Environmental Compliance Section

Subject: **NMED Comments, Pyramid Peak Mining, LLC, Summit Mine, Grant County, Modification 19-1, GR011ME**

Date: February 14, 2019

---

The New Mexico Environment Department (NMED) received correspondence from the Mining and Minerals Division (MMD) on February 8, 2019 requesting NMED review and provide comments on the above referenced MMD permitting action. In accordance with 19.10.5.505 B (3) NMAC, NMED is providing comments within the time period requested by MMD.

**Background**

The Summit Mine is an underground mine located approximately 15 miles northeast of Duncan, Arizona in Section 36, T16S, R21W, Grant County, NM. The Summit Mine is situated in relatively mountainous terrain accessed by a dirt road maintained by Grant County. The Summit Mine is a deposit of low sulfidic, epithermal intrusive quartz formed in steeply dipping, structurally controlled veins that cut and dissect older volcanic terrain, the predominant material in the Steeple Rock District. The ore historically produced from the summit mine is composed primarily of quartz containing microscopic amounts of gold and silver, and very few sulfides.

Specific to Modification 19-1, NMED was requested to review a corrective action report related to rock slides of development material (waste rock) that occurred at the mine site. The manner in which the development rock was placed resulted in mining waste rock slides that encroached on land managed by the Bureau of Land Management (BLM). The report describes the removal of waste rock from BLM land, regrading of the waste rock, construction of a buttress at the toe of the waste rock, placement of suitable cover, and reseeding of the reclaimed waste rock.

**Mining Environmental Compliance Section**

Staff in the Mining Environmental Compliance Section (MECS) of NMED had been previously contacted by MMD to assist with review of the slope failure at the Summit Mine and to provide input related to mitigation of the slope failure and reclamation of the waste rock. In a memorandum dated October 1, 2018 (attached) MECS made recommendations related to reclamation of the waste rock including keying the buttress constructed at the toe of the waste rock into bedrock. Review of the corrective action report indicates the recommendations of MECS were incorporated into the design and reclamation of the waste rock.

**NMED Summary Comment**

NMED finds that the reclamation of the slope failure at the Summit Mine is likely to have minimal impact to the environment.

If you have any questions, please contact Jeff Lewellin at (505) 827-1049.

Attachment: October 1, 2018 Memorandum to Holland Shepherd from Keith Ehlert, *Pyramid Peak Mining, Summit Mine, Comments on Revised Corrective Action Plan, Waste Facility Landslide*

cc: Shelly Lemon, Bureau Chief, SWQB  
Liz Bisbey-Kuehn, Bureau Chief, AQB  
Fernando Martinez, Division Director, EMNRD-MMD  
Clint Chisler, Lead Staff, EMNRD-MMD  
Kurt Vollbrecht, Program Manager, MECS  
Keith Ehlert, Operational Team Leader, MECS



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Ground Water Quality Bureau*  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, New Mexico 87502-5469  
Phone (505) 827-2900 Fax (505) 827-2965  
[www.env.nm.gov](http://www.env.nm.gov)



BUTCH TONGATE  
Cabinet Secretary

J.C. BORREGO  
Deputy Secretary

DATE: October 1, 2018

TO: Holland Shepherd, Program Manager, Mining Act Reclamation Program

FROM: Keith Ehlert, Mining Environmental Compliance Section, New Mexico Environment Department

RE: **Pyramid Peak Mining, Summit Mine, Comments on Revised Corrective Action Plan, Waste Facility Landslide**

---

The Mining Environmental Compliance Section (MECS) of the New Mexico Environment Department (NMED) received an informal request from the Mining and Minerals Division (MMD) to provide comments on a revised correction action plan (RCAP) pertaining to a slope failure that occurred on a waste rock stockpile at the Summit Mine. The RCAP is dated August 9, 2018. MECS previously provided comments on a preliminary corrective action plan (PCAP) dated January 26, 2018 and it is MECS opinion that the RCAP provides options that better accommodate site conditions than the PCAP provides.

On September 18, 2018 MECS participated in a teleconference with representatives of MMD and Pyramid Peak Mining to discuss various aspects of the RCAP. During the teleconference MECS expressed concerns regarding whether there is a need for a blanket drain or some other type drainage system in the buttress. Representatives of Pyramid Peak Mining indicated the buttress would be free draining. However, MECS pointed out that the material in the buttress would be compacted during placement, which is appropriate and necessary, but questioned whether the material would be free-draining after compaction. MECS also expressed concerns about constructing the buttress on a flat bedrock surface as opposed to keying the buttress into the bedrock. MECS requests that Pyramid Peak Mining consider whether a drain system should be incorporated into the buttress design and whether it is necessary to key the buttress into the underlying bedrock.