

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd E. Leahy, JD, PhD
Deputy Cabinet Secretary

Jerry Schoeppner, Director
Mining and Minerals Division



Electronic Transmission

October 15, 2020

E. Terry Jensen
Gila Mining, LLC
3450 Peru Mill Road
Deming, NM 88030

RE: Agency Review Comments and Request for Additional Information, Peru Mill Tailings Minimal Impact Exploration Project Modification 20-1 Application, Permit No. LU038EM – Luna County, New Mexico

Dear Mr. Jensen,

The New Mexico Mining and Minerals Division (“MMD”) has received an application from Gila Mining LLC (“Gila Mining”) to modify Permit No. LU038EM. MMD has also received agency comments on the September 4, 2020 submittal from Gila Mining.

Enclosed with this letter are the reviewing agency comment letters submitted by the following state agencies: the New Mexico Environment Department (“NMED”), the New Mexico Office of the State Engineer (NMOSE), and the New Mexico Department of Cultural Affairs - Historic Preservation Division (“NMDCA/HPD”).

In addition to State and Federal agencies, the White Mountain Apache Tribe Historic Preservation Office and the Ysleta del Sur Pueblo have commented on the Modification 20-1 Application for Permit No. LU038EM. Please take the tribal comments into consideration during this process. Additionally, please find general comments from MMD based on review of this application. Attached to this letter are all comments from State and Tribal agencies.

General Comments:

MMD has reviewed the Permit Application Package (“PAP”) and deemed it administratively complete, pursuant to §19.10.3.302 G NMAC, in a letter to Gila Mining dated September 16, 2020. However, MMD has reviewed the PAP and has found it to be *technically incomplete* pending receipt of acceptable supplemental information identified in this letter. **Please respond, within no later than 30 days of receipt of this letter, to the information requested.**

MMD has the following comments to be addressed in writing:

October 15, 2020

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1. Section 4.C provides dimensions for both the north and south excavations. The volume calculated using these dimensions is 1,806 y³ for the north excavation and 20,463 y³ for the south excavation. These volumes exceed the allowed 999 y³ that can be excavated under this permit. Please clarify the volume of tailings to be excavated from the north and south piles.
2. Section 4.F of the application states the new roads will not be reclaimed. MMD will require all disturbance including new roads to be reclaimed.
3. The acreages for north and south excavations in the Disturb Area Summary table in Section 4.H differ from the acreages calculated based on the dimensions provided in Section 4.C. Please clarify the correct acreage for the surface disturbance for both excavations.
4. What will be stored in the two 40' shipping containers mentioned in Section 4.E?
5. MMD will require the 100-gallon above ground fuel tank mentioned in Section 5.C to have a secondary containment system.
6. Section 7.D states “plywood barriers are planned along the walls if the tailings in the building exceed the height of the exterior walls.” Please explain in more detail how plywood barriers would be used and provide either images or diagrams indicating where the plywood would be. MMD’s understanding is the building that is to be used to store tailings has walls that reach the ceilings.
7. Please provide more explanation on how the volume of tailings removed will be estimated using the building as mentioned in Section 7.D.
8. Section 7.D says “tailings will be containerized in the building and shipped off-site for testing and process design.” Please explain how the tailings are being shipped off and where the tailings are going.
9. MMD will require mulch to be applied after seeding is complete.
10. The lease provided in the application between the City of Deming and Gila Mining was for one year from September 10, 2019. Please provide an updated lease or other document which shows Gila Mining has the right to enter the property pursuant 19.10.3.302.D.1 NMAC.

**NMED Mining Environmental Compliance Section, Ground Water Quality Bureau
Comments (“MECS”)**

Please review the comment letter received by NMED MECS Ground Water Quality and respond to the concerns.

NMED Air Quality Bureau Comments:

Please review the comment letter received by NMED Air Quality Bureau and respond to the concerns.

NMED Surface Water Quality Bureau Comments:

Please review the comment letter received by NMED Surface Water Quality Bureau and respond to the concerns.

**Agency Review Comments and Request for Additional Information, Peru Mill Tailings Minimal Impact
Exploration Project Modification 20-1 Application, Permit No. LU038EM – Luna County, New Mexico**

October 15, 2020

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NMOSE Comments:

Please review the comment letter received by NMOSE and respond to the concerns.

NMDCA/HPD Comments:

Please review the comment letter received by NMDCA/HPD and respond to the concerns.

White Mountain Apache Tribe Comments:

Please review the comment letter received by the White Mountain Apache Tribe and respond to the concerns.

Ysleta del Sur Pueblo Comments:

Please review the comment letter received by the Ysleta del Sur Pueblo and respond to the concerns.

Should you have any questions, comments, would like to schedule a meeting, or require additional information concerning this letter, please contact me at (505) 470-5354, or via email at: jennifere.johnson@state.nm.us.

Sincerely,



Jenn Johnson, Permit Lead
Mining Act Reclamation Program (“MARF”)

Enclosures:

October 9, 2020, Letter to MMD from NMED
September 21, 2020 Letter to MMD from NMOSE
September 24, 2020 Letter to MMD from NMDCA/HPD
September 23, 2020 Letter to MMD from the White Mountain Apache Tribe
October 2, 2020 Letter to MMD from the Ysleta del Sur Pueblo

Cc w/o enclosures:

Holland Shepherd, Program Manager, MARP/MMD
Mine File (LU038EM)



Michelle Lujan Grisham
Governor

Howie C. Morales
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Ground Water Quality Bureau

1190 Saint Francis Drive / PO Box 5469
Santa Fe, NM 87502-5469
Phone (505) 827-2900 Fax (505) 827-2965
www.env.nm.gov



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

MEMORANDUM

Date: October 9, 2020

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

Through: Anne Maurer, Mining Environmental Compliance Section

From: George Llewellyn, Mining Environmental Compliance Section
John Moeny, Surface Water Quality Bureau
Rhett Zyla, Air Quality Bureau

Subject: **NMED Comments, Exploration Permit, Modification 20-1, Peru Mill Tailing, Gila Mining, LLC, Luna County, New Mexico Mining Act Permit No. LU038EM**

The New Mexico Environment Department (NMED) received correspondence from the Mining and Minerals Division (MMD) on September 16, 2020 requesting NMED review and provide comments on the above-referenced MMD permitting action. Pursuant to the Mining Act this operation is permitted as an exploration project. MMD requested comments on the application within 20 days of receipt in accordance with Section 19.10.2.302.G NMAC. NMED requested an extension for comments to be submitted by October 9, 2020. NMED has the following comments.

Background

Gila Mining, LLC (applicant) is proposing to excavate no more than 999 cubic yards of material from the tailing piles and temporarily store them on-site in a building located on the property.

Air Quality Bureau

The Air Quality Bureau comments are attached.

Surface Water Quality Bureau

The Surface Water Quality Bureau comments are attached.

Mining Environmental Compliance Section (MECS)

The MECS has the following comments:

1. Section 4 – Exploration Description. Using the dimensions provided for two test pits (one on the South Tailings Pile and the other on the north Tailings Pile) the volume (cubic yards) proposed for excavation exceeds the 1,000 cubic yards allowed under a Minimal Impact Exploration Permit. The proposed cubic yardage of material or the dimensions of the test pits needs to be reevaluated by the applicant.
2. Section 7.B – Reclamation & Operations Plan. The applicant indicates in this section of the application that berms are not considered “necessary or applicable”. At a minimum, berms should be maintained around the crest of the excavation to ensure stormwater will not run off the tailing cover and into the excavation area. Also, the applicant needs to describe Best Management Practices (BMP’s) to control offsite tracking of tailing material from truck traffic and construction equipment.
3. The modification application does not discuss the purpose of the request to modify the permit. Based on discussions with the applicant, bench scale testing is needed to develop a comprehensive mine plan. The applicant submitted a Sampling and Analysis Plan (SAP) to NMED on September 24, 2020. NMED is preparing a response to the SAP that will address NMED questions regarding how results from the bench scale testing will be used to create a comprehensive mine plan. It would be helpful for the applicant to outline next steps as part of the exploration permit activities and link them to activities associated with Mining Act Permit No. LU040MN.
4. This property currently is covered under a covenant-not-to-sue that is held by the City of Deming and NMED that is the result of reclamation conducted under the NMED -VRP. The covenant-not-to-sue requires that the tailings piles not be disturbed. Please provide written confirmation from the City of Deming that the property has been approved to be released from the NMED-VRP and the covenant-not-to-sue.

NMED Summary Comment

Additional information will be requested as part of NMED’s response to the SAP, which MMD will be copied on. NMED finds that the changes proposed in the Modification 20-1 application will be protective of the environment if done in accordance with the approved permits, pollution controls, and the comments above.

If you have any questions, please contact Kurt Vollbrecht at (505) 827-1095.

Holland Shepherd, Program Manager

October 9, 2020

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cc: Jennifer Johnson, Lead Staff, EMNRD-MMD
Kurt Vollbrecht, Program Manager, MECS
Shelly Lemon, Bureau Chief, NMED-SWQB
Elizabeth Bisbey-Kuehn, Bureau Chief, NMED-AQB



**NEW MEXICO
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Michelle Lujan Grisham
Governor

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James C. Kenney
Cabinet Secretary

Howie C. Morales
Lt. Governor

Jennifer J. Pruett
Deputy Secretary

MEMORANDUM

DATE: October 6, 2020

TO: Kurt Vollbrecht, Program Manager, Mining Environmental Compliance Section

FROM: Rhett Zyla, Environmental Scientist & Specialist - Air Quality Bureau

RE: Request for Comments on Modification 20-1 to Permit LU038EM, Peru Mill Tailings Exploration, Gila Mining, Luna County

The New Mexico Air Quality Bureau (AQB) has completed its review of the above-mentioned mining project. Pursuant to the New Mexico Mining Act Rules, the AQB provides the following comments.

Air Quality Permitting History

The AQB has not issued any permits for this operation.

Details

Gila Mining, LLC (“Gila”) is requesting a modification to its minimal impact exploration permit, at its Peru Mill Tailings site, located in Township 23S, Range 9W, Section 18, Luna County, New Mexico, approximately 3 miles northwest of Deming. Gila is seeking to expand on exploration carried out in 2019 with two test excavations/exploratory trenches.

Air Quality Requirements

The New Mexico Mining Act of 1993 states that “Nothing in the New Mexico Mining Act shall supersede current or future requirements and standards of any other applicable federal or state law.” Thus, the applicant is expected to comply with all requirements of federal and state laws pertaining to air quality. Current requirements which may be applicable in this mining project include, but are not limited to the following:

Paragraph (1) of Subsection A of 20.2.72.200 NMAC, *Application for Construction, Modification, NSPS, and NESHAP - Permits and Revisions*, states that air quality permits must be obtained by:

“Any person constructing a stationary source which has a potential emission rate greater than 10 pounds per hour or 25 tons per year of any regulated air contaminant for which there is a National or New Mexico Ambient Air Quality Standard. If the specified threshold in this subsection is exceeded for any one regulated air contaminant, all regulated air contaminants with National or New Mexico Ambient Air Quality Standards emitted are subject to permit review.”

Further, Paragraph (3) of this subsection states that air quality permits must be obtained by:

“Any person constructing or modifying any source or installing any equipment which is subject to 20.2.77 NMAC, *New Source Performance Standards*, 20.2.78 NMAC, *Emission Standards for Hazardous Air Pollutants*, or any other New Mexico Air Quality Control Regulation which contains emission limitations for any regulated air contaminant.”

Also, Paragraph (1) of Subsection A of 20.2.73.200 NMAC, *Notice of Intent*, states that:

“Any owner or operator intending to construct a new stationary source which has a potential emission rate greater than 10 tons per year of any regulated air contaminant or 1 ton per year of lead shall file a notice of intent with the department.”

In addition, pursuant to Subsection A of 19.10.3.302 NMAC, *Minimal Impact Exploration Operations*:

“A minimal impact exploration operation will not exceed 1000 cubic yards of excavation per permit. Disturbances for constructed roads, drill pads and mud pits shall be no more than 5 acres total and will not be counted in the excavated materials. The type of road construction, the number and type of drill pads, and other disturbances when considered with site specific conditions will be major factors in determining eligibility for minimal impact status which is in the discretion of the director.”

The above is not intended to be an exhaustive list of all requirements that could apply.

Fugitive Dust

Fugitive dust is a common problem at mining sites and this project will temporarily impact air quality as a result of these emissions. However, with the appropriate dust control measures in place, the increased levels should be minimal. Disturbed surface areas, within and adjacent to the project area, should be reclaimed to avoid long-term problems with erosion and fugitive dust. EPA's *Compilation of Air Pollutant Emission Factors, AP-42, "Miscellaneous Sources"* lists a variety of control strategies that can be included in a comprehensive facility dust control plan. A few possible control strategies are listed below:

Unpaved haul roads and traffic areas: paving of permanent and semi-permanent roads, application of surfactant, watering, and traffic controls, such as speed limits and traffic volume restrictions.

Paved roads: covering of loads in trucks to eliminate truck spillage, paving of access areas to sites, vacuum sweeping, water flushing, and broom sweeping and flushing.

Material handling: wind speed reduction and wet suppression, including watering and application of surfactants (wet suppression should not confound track out problems).

Bulldozing: wet suppression of materials to “optimum moisture” for compaction.

Scraping: wet suppression of scraper travel routes.

Storage piles: enclosure or covering of piles, application of surfactants.

Miscellaneous fugitive dust sources: watering, application of surfactants or reduction of surface wind speed with windbreaks or source enclosures.

Recommendation

The AQB has no objection to the current request for a permit modification from MMD.

This written evaluation does not supersede the applicability of any forthcoming state or federal regulations.

If you have any questions, please contact me at (505) 476-4304.



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

MEMORANDUM

DATE: October 1, 2020

TO: Anne Maurer, Mining Act Team Leader
Mining Environmental Compliance Section
Ground Water Quality Bureau (GWQB)

FROM: John Moeny
Watershed Protection Section
Surface Water Quality Bureau (SWQB)

RE: **Request for Comments, Modification 20-1, Peru Mill Tailings Project, Luna County,
MMD Permit No. LU038EM**

On September 17, 2020 NMED received a request for comments regarding a permit modification to an existing minimal impact exploration permit at the Peru Mill tailings impoundment located in Luna County northwest of Deming.

Summary of Proposed Action

The applicant, Gila Mining LLC., seeks to modify their existing exploratory permit to excavate two trenches within the reclaimed tailings impoundment located on lands owned by the city of Deming. The existing cover material would be removed and stockpiled for later reuse. Approximately 1,000 cubic yards of tailing material will be excavated from two linear trenches and temporarily stored in a covered building on-site. The tailing material will be loaded into sealed containers for transport to an off-site facility for testing and processing. Following excavation, trench slopes will be laid back to 3:1 slope, the cover material replaced, and native seed broadcast over the disturbance. Total disturbance is estimated at less than 1 acre.

Recommended Best Practices to prevent surface water quality degradation

- Unintentional impacts by heavy equipment or service vehicles to the revegetated cover material on the tailings impoundment should be reclaimed using appropriate seed mixes or coarse aggregate material to prevent future erosion
- Fuel, oil, hydraulic fluid, lubricants, and other petrochemicals must have a secondary containment system to prevent spills.
- Excavation should be delayed if the cover material of the impoundment is wet or saturated from precipitation to prevent rutting and potential for future water channeling and erosion.
- Appropriate spill clean-up materials such as absorbent pads must be available on-site at all times during road construction, site preparations, drilling and reclamation to address potential spills.
- Report all spills immediately to the NMED as required by the New Mexico Water Quality Control Commission regulations (20.6.2.1203 NMAC). For non-emergencies during normal business hours, call 505-428-2500. For non-emergencies after hours, call 866-428-6535 or 505-428-6535 (voice mail, twenty-four hours a day). For emergencies only, call 505-827-9329 twenty-four hours a day (NM Dept of Public Safety).

Impacts to Surface Water Quality

The SWQB finds the applicants proposed exploration is likely to have a minimal impact to surface waters if operated and reclaimed with the approved permits and pollution controls and the comments above.

If you have any questions, please phone me at (575) 956-1545.

From: [Zemlick, Katie, OSE](#)
To: [Johnson, Jennifer E, EMNRD](#)
Cc: [Musharrafiyh, Ghassan R., OSE](#); [Larios, Susana, OSE](#)
Subject: Re: Request for Comments on Mod. 20-1, Permit LU038EM, Peru Mill Tailings Exploration
Date: Monday, September 21, 2020 10:42:02 AM

Dear Jenn,

The NMOSE Hydrology Bureau received your request for the modification of Permit LU038EM, Peru Mill Tailings Exploration. Our previous comments regarding potential hydrologic impacts associated with the Minimal Impact Exploration Permit Application (9/3/2019) also apply to the modified application. We do not have any additional comments at this time. Please feel free to contact me if you have any additional questions.

Sincerely,

Katie Zemlick, Ph.D.
Hydrology Bureau
New Mexico Office of the State Engineer
Concha Ortiz y Pino Building
130 South Capitol St., Santa Fe, NM 87502
Tel: (505)827-6153 / katie.zemlick@state.nm.us

From: Johnson, Jennifer E, EMNRD
Sent: Wednesday, September 16, 2020 11:12 AM
To: Musharrafiyh, Ghassan R., OSE
Cc: Shepherd, Holland, EMNRD
Subject: Request for Comments on Mod. 20-1, Permit LU038EM, Peru Mill Tailings Exploration

Hello,

Attached please find the request for comment letter regarding the above-referenced exploration project. Please print copies for your files as needed.

Cheers,

Jenn Johnson
Reclamation Engineer, E.I.
Mining Act Reclamation Program / Mining and Minerals Division
1220 S. St. Francis Drive Santa Fe, NM 87505
(505) 470-5354 / jennifere.johnson@state.nm.us
Please note the new phone number



Michelle Lujan
Grisham
Governor

STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

BATAAN MEMORIAL BUILDING
407 GALISTEO STREET, SUITE 236
SANTA FE, NEW MEXICO 87501
PHONE (505) 827-6320 FAX (505) 827-6338

September 24, 2020

Jenn Johnson
Permit Lead, Mining Act Reclamation Program
Mining and Minerals Division
1220 South Saint Francis Drive
Santa Fe, NM 87505

Re: HPD Log# 113740, Request for Comments on Modification 20-1 to Permit LU038EM, Peru Mill Tailings Exploration, Gila Mining, Luna County

Dear Ms. Johnson:

I am writing in response to your request for comment on the above referenced exploration permit application received at this office September 18, 2020.

Pursuant to 19.10.5.505 NMAC, Permit Modifications and Revisions, the Director shall determine whether a permit modification would have an adverse impact on cultural resources listed on either the National Register of Historic Places or the State Register of Cultural Properties or be located in a known cemetery or other burial ground.

According to our files, there are no cultural resources listed on either the National Register of Historic Places or the State Register of Cultural Properties in the proposed Project area. There are also no known cemeteries or other burial grounds. Based on this information, this permit will have no adverse impacts to cultural resources listed on the National or State Registers. The Peru Mill Mine, however, is an historic property that is eligible for listing on the National Register of Historic Places, during the project care should be taken to limit any excavations to the tailing piles and to not adversely impact any standing structures at the site.

If you have any questions concerning these comments, please do not hesitate to contact me by phone at (505)-452-6115 or e-mail me at richard.reycraft@state.nm.us

Sincerely,

Richard Reycraft

Richard. Reycraft
HPD Staff Archaeologist



White Mountain Apache Tribe

Office of Historic Preservation

PO Box 1032

Fort Apache, AZ 85926

Ph: (928) 338-3033 Fax: (928) 338-6055

To: Jerry Schoepner, New Mexico Mining and Mineral Division

Date: September 23, 2020

Re: *Gila Mining LLC proposed excavation of 999 yds of material from Peru Mill Tailings*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; September 17, 2020. In regards to this, please attend to the following statement below.

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed excavation of 999 yards of material from the existing tailing at Peru Mill Tailings, Luna County, New Mexico (*Permit No. LU038EM*).

Please be advised, we've determined the proposed project will ***"Not have an Adverse Effect"*** on the tribe's cultural heritage resources and/or historic properties. No further consultation is necessary and/or required.

Thank you for your continued collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark T. Altaha

White Mountain Apache Tribe – THPO
Historic Preservation Office



Ysleta del Sur Pueblo

Tribal Council – Javier Loera (War Captain/Tribal Historic and Preservation Officer) E-mail jloera@ydsp-nsn.gov

117 South Old Pueblo Road * P.O. Box 17579 * El Paso, Texas 79917 * (915) 859-8053 * Cell (915) 497-3853

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OCT 02 2020

MINING & MINERALS DIVISION

Mr. Jerry Schoeppner
Dir. Mining and Minerals Division
State of New Mexico
Energy, Minerals and Natural Resources Dept.
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Mr. Schoeppner,

This letter is in response to the correspondence received in our office in which you provide the Ysleta del Sur Pueblo the opportunity to comment on **Request for Comments on Minimal Impact Exploration Application, Modification 20-1 to Excavate 999 yd³ of Material from Existing Tailings Piles Within the Current Permit Boundary, Peru Mills Tailings Exploration, Luna County, New Mexico, Permit No. LU038EM.**

The Ysleta del Sur Pueblo does not have any comments nor does it request consultation on this impending project.

Thank you for allowing us the opportunity to comment on this proposed project.

Sincerely,

Javier Loera
Tribal Council/Tribal Historic Office
for
Governor E. Michael Silvas
Ysleta del Sur Pueblo

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd Leahy, JD, Ph.D.
Deputy Cabinet Secretary

Jerry Schoepner, Director
Mining and Minerals Division



September 17, 2020

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SEP 22 2020

BY: *Fred J. Lopez*

Governor E. Michael Silvas
Ysleta del Sur Pueblo
P119 S. Old Pueblo Road
Ysleta del Sur Pueblo, TX 79917

Re: Request for Comments on Minimal Impact Exploration Application, Modification 20-1 to Excavate 999 yd³ of Material from Existing Tailings Piles Within the Current Permit Boundary, Peru Mill Tailings Exploration, Luna County, New Mexico, Permit No. LU038EM

Dear Governor Silvas,


The Mining and Minerals Division ("MMD") of the New Mexico Energy, Minerals, and Natural Resources Department has received an application from Gila Mining, LLC ("Permittee") to excavate no more than 999 yd³ of material from the existing tailings piles within the current permit boundary for the Peru Mill Tailings Exploration project in accordance with 19.10.3.302.J NMAC of the New Mexico Mining Act (NMSA 1978, §69-36-1 et seq.). The Peru Mill Tailings Exploration project is located in Section 18 of Township 23 South, Range 9 West in Luna County.

Please see the attached map of the exploration location. The application for Modification 20-1 received by MMD can be viewed in its entirety by visiting the MMD website at <http://www.emnrd.state.nm.us/MMD/MARP/LU038EM.html>.

As part of the application process, MMD is also requesting comments from the New Mexico Department of Cultural Affairs, Historic Preservation Division ("HPD") on this permit revision request from the Permittee. The New Mexico Mining Act does not grant MMD statutory authority to require the Permittee to conduct an archaeology survey on private land. However, the permit will contain conditions that mandate the Permittee, or any person working on the Permittee's behalf, to immediately suspend all operations and notify MMD and HPD if and when a cultural resource is discovered. It then rests with HPD to evaluate the discovery to determine an appropriate course of action.

If there are known cultural resources in the vicinity of this project that your tribe is aware of, please provide any comments and concerns to MMD by October 9, 2020. Please contact me at (505) 476-3435, or Jenn Johnson of my staff at (505) 470-5354 or jennifere.johnson@state.nm.us with any questions or if you wish to meet to discuss the application.

Sincerely,


Jerry Schoepner, Director
Mining and Minerals Division

Enclosures (Project Vicinity Map)
cc: Project File (LU038EM, Modification 20-1)