



October 15, 2020

Carmen Rose  
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Mining and Minerals Division  
Mining Act Reclamation Program  
1220 S. St. Francis Drive  
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Cell: (505) 216-8399

**RE: Response to Agency Review Comments and Request for Additional Information Ray Claims No. 4 & 6 Mine, Permit No. CI006MN Modification 20-1 Application, Cibola County, New Mexico**

Dear Ms. Rose,

Thank you for your letter regarding the application, including supplemental materials, to modify Permit No. CI006MN, Ray Claims No. 4 & 6 Mine, on June 30, 2020 sent on behalf of Stoneworld Company, Inc. ("Stoneworld").

We understand that MMD received written comments from NMDCA, NMDG&F, and NMED. Please see our responses as follows:

**General Comments:**

1. Due to the impossibility of moving an excavator onto the site due to an impassible bridge, major modifications of slope material to the extent requested are not feasible. Stoneworld will do their best to grade the areas of concern to minimize erosion.

We request an extension of the reseeding timeline to the end of summer 2021, when soil moisture conditions are suitable. To seed by October 31, 2020 is not practical because it would result in a failure of germination due to dry conditions.

2. Topsoil is extremely limited at this travertine outcrop site. The available topsoil will be applied around the highwall and just below the highwall. Due to the futility of placing topsoil on rock outcrops, sites where vegetative growth is practical will be prioritized.
3. In early October, the waste rock along the base of the highwall was moved and the area along the base of the highwall was re-graded to a more natural talus slope.

4. Because to the rocky nature of the travertine site, drill seeding is not feasible. Broadcast seeding will occur. The rates listed below will be doubled for the broadcast seeding. The following seed mix will be used in order to incorporate pollinator species into the seed mix, as recommended by NMDG&F's comment letter:

Common name	Scientific name	Variety	PLS (lb/acre)
Galleta	<i>Pleuraphis jamesii</i>	Viva	2.0
Alkali sacaton	<i>Sporobolus airoides</i>	Salado	1.0
Scarlet globemallow	<i>Sphaeralcea coccinea</i>	VNS	0.5
Blue grama	<i>Bouteloua gracilis</i>	Hachita	0.5
Western wheatgrass	<i>Pascopyrum smithii</i>	Arriba	2.0
Winterfat	<i>Krascheninnikovia lanata</i>	VNS	0.5
Bottlebrush squirreltail	<i>Elymus elymoides</i>	VNS	1.0
Fourwing saltbush*	<i>Atriplex canescens</i>	New Mexico	1.0
Prairie zinnia	<i>Zinnia grandiflora</i>	VNS	1.0
Rocky Mountain beeplant	<i>Cleome serrulata</i>	VNS	3.0

\* VNS = Variety not specified: choose a source from an area that would be suitable for the source site; generally from a higher elevation or latitude.

5. The Best Management Practices (BMPs) utilized to stabilize slopes and control erosion at both Ray Claims No. 4 and No. 6 mines will include both rock and boulder placement to slow water.
6. The first draft of the post-reclamation layout map is obsolete due to the contents of this letter. A map will be prepared.
7. The permittee considered installing rolling dips, however, since the road is going to be closed, water bars were installed, per BLM direction.

Please let me know if you have any questions, comments, or require additional information concerning this letter.

Respectfully,  
On Behalf of Stoneworld LLC



Mary Darling, Environmental Manager  
Darling Geomatics

