

State of New Mexico
Energy, Minerals and Natural Resources Department

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Mining and Minerals Division



July 13, 2020

Mr. Justin Andrews, Environmental Manager-West Region
Lhoist North America
Chemical Lime Mine and Mill
2900 W. Horizon Ridge Pkwy, Ste 120
Henderson, NV 89052

RE: Comments on Modification 20-1 Lime Plant Reclamation Plan, dated April 2020: Chemical Lime Mine Site, Permit Tracking No. GR030ME

Dear Mr. Justin Andrews,

The New Mexico Mining and Minerals Division (“MMD”) received your *Lime Plant Reclamation Plan*, dated April 2020 for the Chemical Lime Mine Site, Permit Tracking No. GR030ME on April 30, 2020.

MMD Comments

1. MMD recognizes that this reclamation plan only applies to the reclamation taking place at the 16.3 acres of the old mill site as shown on the Mill Site Map (Figure 3 in Appendix A) included in the application.
2. MMD approves the bond amount. Please provide MMD with drafts of the proposed Financial Assurance mechanisms per §19.10.12.1208 NMAC.
3. Initial reclamation described in Section 1.4.1 of the Reclamation Plan is approved.
4. Lhoist North America must ensure that after regrading of the Mill Site Area will have positive drainage with no ponding on the reclaimed areas. Please add this to the Final Reclamation Plan.
5. MMD approves the proposed reference area. Provide MMD with vegetative survey results of the reference area for use in determining vegetative success.
6. In the Final Reclamation Plan, provide MMD with a vegetative and erosion monitoring schedule for the full 12-year bonding period.
7. Broken up existing foundations that plan to be buried in place described in Section 1.5.1 of the Reclamation Plan must be buried under a 2 ft. minimum of cover. Please add this to the Final Reclamation Plan.
8. In the Final Reclamation Plan, include a column in Table 1-1: Reclamation Seed Mix and Application that shows PLS seed/square ft. The seed mix applied with broadcast seeding shall at a minimum be 50 pls/square ft.
9. Mulch shall be applied a minimum of 2 tons/acre. Please add this to the Final Reclamation Plan.

**Comments on Lime Plant Reclamation Plan, dated April 2020: Chemical Lime Mine Site,
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10. Success Criteria vegetative cover described in Section 1.8.2.2 of the Reclamation Plan shall only be measured with native vegetative species regarding the 75% cover metric. Please add this to the Final Reclamation Plan.
11. In the Final Reclamation Plan, provide MMD with a plan forward for reclamation of the remainder of the Chemical Lime Mine Site. This plan should include a detailed map showing areas that fall either under the NM Mining or as a Sand and Gravel Operation.

State of New Mexico Department of Game & Fish (“NMDGF”) Comments

1. Please make recommended changes to seed mix found in the second paragraph of the NMDGF Comment Letter dated July 6, 2020.

New Mexico Environment Dept. (“NMED”) Comments

1. Please follow the recommendations contained within the NMED Air Quality Bureau Comment Letter dated June 22, 2020.
2. Please follow the recommendations contained within the NMED Surface Water Quality Bureau Comment Letter dated June 29, 2020

United States Forest Service (“USFS”) Comments

1. Please incorporate seed mix changes recommended by USFS with the recommendations from NMDGF.

Please provide MMD with a Final Reclamation Plan per §19.10.5.505 NMAC within 30 days of receipt of this letter. If you have any questions, please contact me at 505-467-9589 or via e-mail at: clinton.chisler@state.nm.us.



Clinton M. Chisler, Permit Lead
Mining Act Reclamation Program (“MARF”)

cc: Holland Shepherd, Program Manager, MARF
Mine File (GR030ME)