



Via email

April 28 2021

Clinton M. Chisler
Reclamation Soil Scientist
Mining and Minerals Division
Mining Act Reclamation Program
Wendell Chino building 3rd Floor Room 363
1220 S. St. Francis Drive
Santa Fe, NM 87505
(505) 476-3413
Clinton.Chisler@state.nm.us

RE: *Response to Comments*
Modification 21-1
Permit No. BE001RE

Dear Mr. Chisler:

GCC Rio Grande, Inc. (GCC) is submitting this letter in response to comments received on May 6, 2020. See the below for a summary of the questions posed and GCC's respective answers.

Commenting Agency	Comment/Question	GCC Response
MMD	Please contact MMD with a draft of the appropriate form of Financial Assurance ("FA") that GCC proposes to use for the increase in FA required regarding exploration activities proposed by the Modification 21-1 Application.	GCC will submit a draft of the FA to MMD once it is available.
OSE	It is undeterminable whether Q18-01 and Q18-03 have already been drilled under different hole number, or whether they are being rolled-into this modification application - twenty-one borings in excess of those noted in the June 8, 2020 tabulation are being requested. Tendering a clear tabulation designating previously approved and currently requested boreholes would clear this up.	GCC has not conducted any drilling since the Modification 20-1 comment response submitted to MMD on June 8 th , 2020. GCC has decided that boreholes Q18-01 and Q18-03 have been removed from the exploration campaign plan, as they are not needed for the facility.
	Since the drilling method used on the previously approved holes is likely the method that would be used on those currently requested, please clarify drilling method, and short of encountering a flowing artesian aquifer, how the use of a pump may be needed for discharging to a pond.	The drilling method to be used by our subcontractor D&S Engineering Labs, LLC, will be wireline mud rotary coring using potable water from the plant facility. Recirculation will be provided through use of small steel "mud pits" of

		<p>approx. 125 gal volume (roughly 3'x5' area).</p> <p>As the purpose of the drilling is to obtain rock core samples for the purposes of geologic stratigraphic correlation and formation chemistry, bentonite or polymer additives will only be used as a last resort to control large water circulation losses.</p> <p>Upon reaching borehole total depth, the boreholes will be abandoned (plugged) using cement-bentonite slurry placed through the wireline casing per OSE Sealant Guidelines for Well Construction and Plugging.</p> <p>The pump language was a mis-statement that should have been omitted from the original response.</p>
	<p>Results from previous deeper GCC drilling in the area would provide the best basis for the expectation of encountering groundwater, and it would benefit GCC application reviewers to be provided a tabulation of area exploration drilling results – particularly previous exploration depth and whether groundwater was encountered.</p>	<p>GCC has no results to provide to OSE since GCC has not conducted any exploration drilling since the approval of Modification 20-1. In Attachment A contains a list of hole locations and associated map.</p>

Please contact me at skretz@gcc.com or 505-377-5288 if you have any questions or require any additional information.

Sincerely,



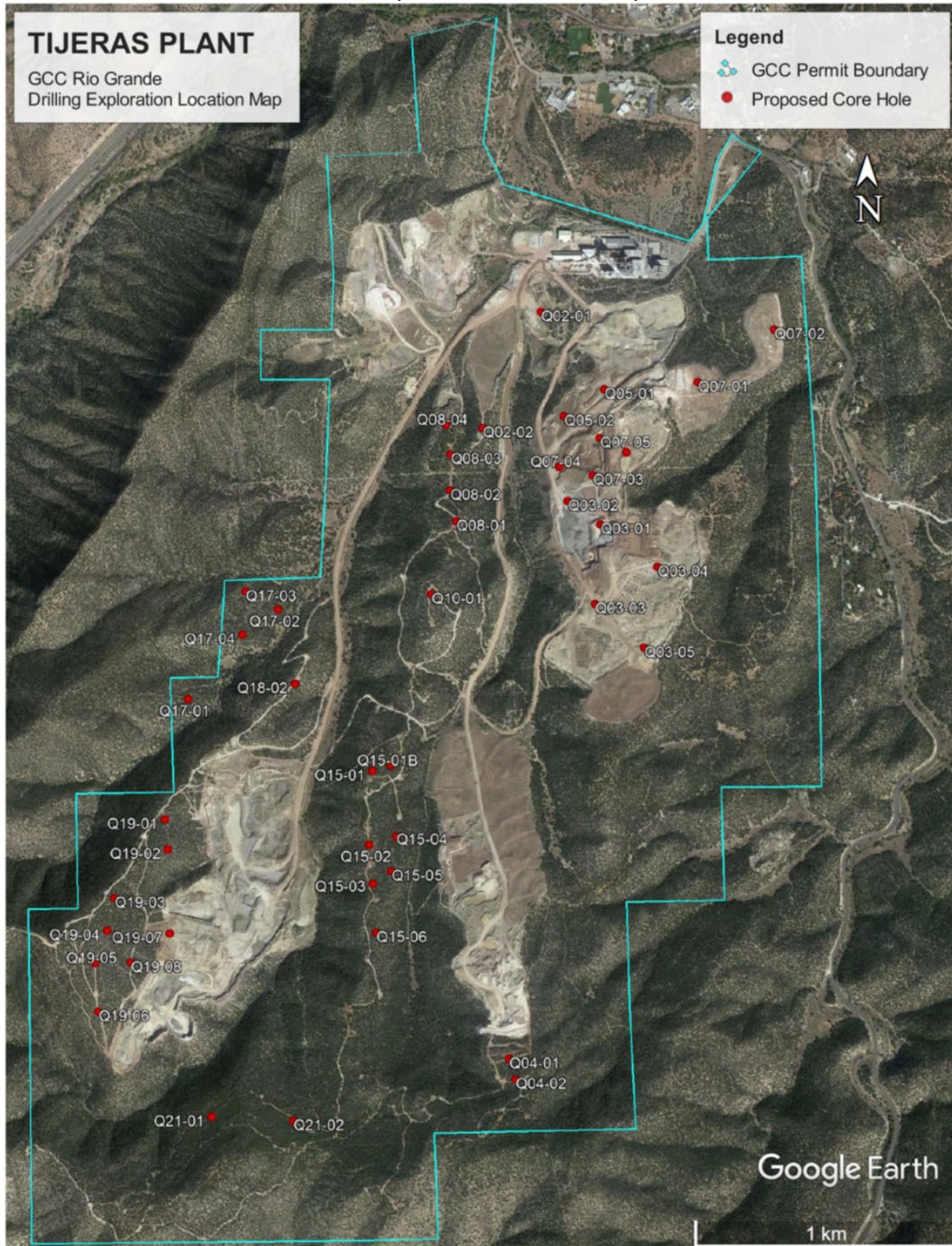
Samantha Kretz
Environmental Engineer
GCC Rio Grande, Inc.

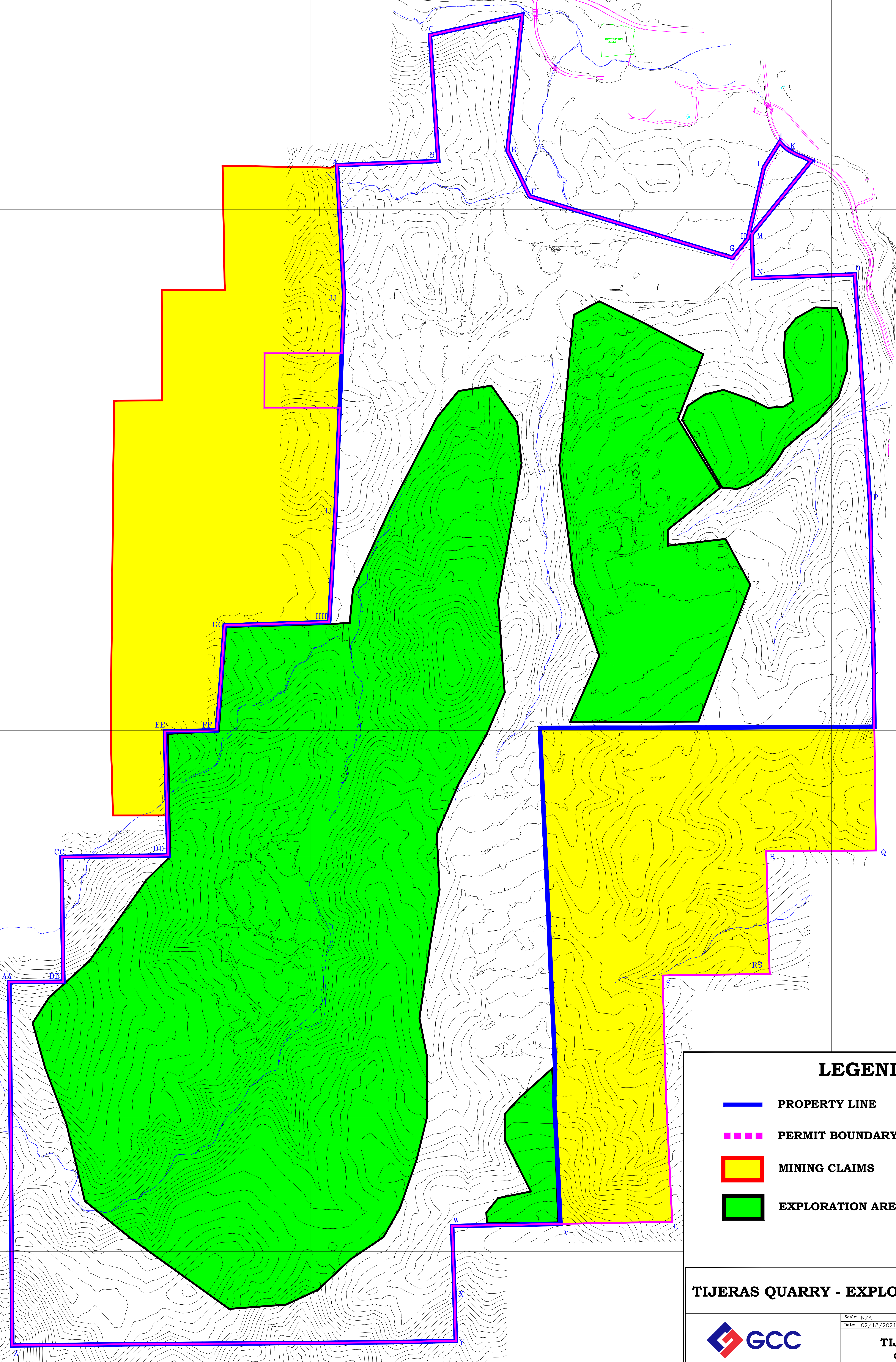
Attachment A

2021 Exploration Campaign Drill Hole List

GCC Drill Hole Numbers	Drill Hole Depths
Q02-01	200
Q02-02	100
Q03-01	600
Q03-02	50
Q03-03	120
Q03-04	120
Q03-05	120
Q04-01	150
Q04-02	150
Q05-01	200
Q05-02	200
Q07-01	200
Q07-02	600
Q07-03	200
Q07-04	50
Q07-05	80
Q07-06	120
Q08-01	150
Q08-02	150
Q08-03	150
Q08-04	150
Q10-01	500
Q15-01	400
Q15-01B	180
Q15-02	180
Q15-03	180
Q15-04	180
Q15-05	180
Q15-06	180
Q17-01	130
Q17-02	130
Q17-03	130
Q17-04	130
Q18-02	80
Q19-01	60
Q19-02	60
Q19-03	60
Q19-04	60
Q19-05	60
Q19-06	60
Q19-07	130
Q19-08	80
Q21-01	80
Q21-02	80
Total	7,170

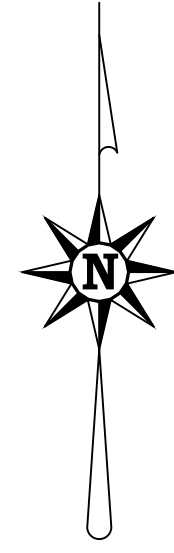
2021 Exploration Drill Hole Map



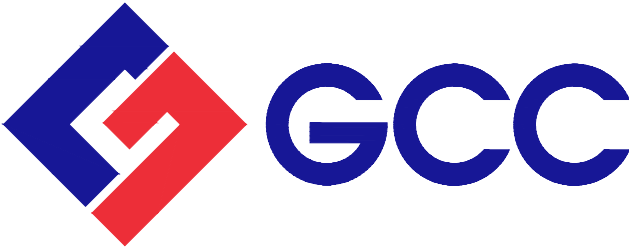


LEGEND

- PROPERTY LINE
- PERMIT BOUNDARY
- MINING CLAIMS
- EXPLORATION AREAS



TIJERAS QUARRY - EXPLORATION AREAS



Scale: N/A
Date: 02/18/2021
Designed By: MTORRES
Drawn By: MTORRES

TIJERAS PLANT
GCC RIO GRANDE