

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

Albert Chang, Director
Mining and Minerals Division



September 15, 2023

Ms. Teri Norgrove
New Metals Strategies, LLC
530-B Harkle Road, Suite 100
Santa Fe, NM 87505

RE: Agency Review Comments and Request for Additional Information, Bella Group Lode Exploration, Sierra County, New Mexico, Permit Tracking No. SI056EM

Dear Ms. Norgrove,

The New Mexico Mining and Minerals Division (“MMD”) has reviewed the Permit Application Package (“PAP”) submitted by New Metals Strategies, LLC, (“Permittee”) for the Bella Group Lode exploration project located in Sierra County, New Mexico. In accordance with 19.10.3.302.G NMAC, MMD requested comments on the PAP from cooperating state and federal agencies.

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 Department of Game and Fish (“NMDG&F”), the New Mexico Office of the State Engineer (“NMOSE”), the New Mexico Department of Cultural Affairs - Historic Preservation Division (“NMDCA/HPD”), the New Mexico Energy, Minerals, and Natural Resources Department – Forestry Division (“Forestry”). Also enclosed are a tribal comment letter from the White Mountain Apache Tribe and general comments from MMD based on review of this application.

General Comments:

MMD has reviewed the PAP and has found it to be *technically complete* contingent on the Permittee’s response to the following comments by reviewing agencies. Please respond to any comments or recommendations in writing within 30 days.

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

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

NMED Surface Water Quality Bureau Comments:

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

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NMED Air Quality Bureau Comments:

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

NMDG&F Comments:

Please review the comment letter received from NMDG&F and respond to all concerns and recommendations raised.

NMOSE Comments:

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

Forestry Comments:

Please review the comment letter received from Forestry and respond to any concerns.

NMDCA/HPD Comments:

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

White Mountain Apache Comments:

Please review the comment letter from the White Mountain Apache Tribe and respond to any concerns.

If you have any questions, please contact me at (505) 470-5354, or via email at kevin.barnes@emnrd.nm.gov.

Sincerely,



Kevin Barnes, Permit Lead
Mining Act Reclamation Program ("MARF")

Enclosures: Agency Letters

Cc with enclosures: Randy Powelson, Fox Mining, LLC
Alex Callan, New Metals Strategies, LLC
John Casey, Geo Scan, Inc.

Cc w/o enclosures: David "DJ" Ennis, Program Manager, MARP/MMD
File (SI056EM)