

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Erin Taylor
Acting Cabinet Secretary

Benjamin Shelton
Deputy Cabinet Secretary

Drew Roybal-Chavez
Deputy Director
Mining and Minerals Division



April 23, 2026

Brooke Clements
North Shore Uranium Ltd.
Unit 1 – 15782 Marine Drive
White Rock, B.C. V4B 1E6

RE: Technical Comments & Application Deemed Technically Approvable on North Shore Uranium Exploration Application, Permit No. SA023EM

Dear Mr. Clements,

The New Mexico Mining and Minerals Division (MMD) has completed the technical review of the submitted application by North Shore Uranium Ltd., for its North Shore Rio Puerco Exploration Project which proposes disturb a total of up to 4.5 acres of Bureau of Land Management (BLM) property (26 drill holes on 26 drill pads).

In accordance with 19.10.3.302.I NMAC, MMD provided the Application to, and requested comments from, the New Mexico Environment Department (NMED), New Mexico Office of the State Engineer (NMOSE), New Mexico Department of Game and Fish (NMDG&F), New Mexico Historic Preservation Division (NMDCA) and New Mexico Forestry Division (NMSFD).

MMD has deemed the application technically approvable, as MMD specific comments require no responses. Please review the attached comments, specifically the OSE comments that pertain to their regulations and separate permitting requirements.

If you have any questions regarding these comments, please contact me at (505) 216- 8945 or at samantha.rynas@emnrd.nm.gov.

Sincerely,

Samantha Rynas, Permit Lead
Mining Act Reclamation Program (“MARF”) Mining
and Minerals Division

Attachment A: Combined Agency Comment letters

CC: David (DJ) Ennis, Program Manager, MARP, MMD
Clint Chisler, Reclamation Specialist Supervisor, MARP, MMD
Mine File SA023EM

Attachment A: MMD Technical Comments

North Shore Uranium Rio Puerco Exploration

Permit No. SA023EM

Date: April 23, 2026

OVERVIEW

Name of Operator: North Shore Uranium

Permit Update: Application

Agency Responses: *Attached and available for review*

New Mexico Department of Cultural Affairs No Comment/No response.

New Mexico Department of Wildlife March 31, 2026

New Mexico Environment Department No response.

New Mexico Office of the State Engineer Submitted April 22, 2026

EMNRD - Forestry Division Submitted March 16, 2026

Bureau of Land Management (BLM) Submitted April 14, 2026

MMD Comments

1. MMD notes that all proposed road and drill pad areas seem feasible and minimize disturbance. The Permittee should be aware that any changes to proposed roads will need to be cleared through MMD. No response is required.
2. Pursuant to BLM request to preserve a cultural site, as well as changes made to the drilling plan attached (page 2, figure 1) is the final proposed drilling plan. This will be the Permit area incorporated into the Permit. Operator provided disturbance, see figure 2.
3. Ensure OSE requirements and permitting provided in the attached OSE comment letter.
4. During the inspection BLM stated the request that mud pits not be lined as they did not want liners to remain on site, so MMD will not require the pits to be lined.
5. MMD would like to meet (phone or online) to do a Permit walk through after approval as this is North Shore Uranium's first permit with MMD.
6. North Shore has requested a 9-hole rolling bond. Below is the Financial Assurance required for the project. The 9 hole average depth is 727.5, Total drill depth feet based on the average for 9 holes would be 6,548 ft. The total project vertical drill depth is 18,915ft.

Attachment A: MMD Technical Comments:

North Shore Uranium Rio Puerco Exploration

Permit No. SA023EM

Date: April 23, 2026

Surface Disturbance

Total Acres:		4.5
First Acre:	\$	12,300.00
Next Acres:	\$	23,800.00
Subtotal:	\$	36,100.00

Exploration Activities

Boreholes:		9
Depth of each (ft):		727.5
Total Footage:		6,548
Cost per Foot:	\$	25.00
Subtotal:	\$	163,687.50

TOTAL FINANCIAL

ASSURANCE REQUIRED: \$ 199,788.00

Permit Lead: Samantha Rynas **DATE:** 4/23/2026

Attachment A: MMD Technical Comments:
North Shore Uranium Rio Puerco Exploration
Permit No. SA023EM
Date: April 23, 2026

Rio Puerco Drilling Plan

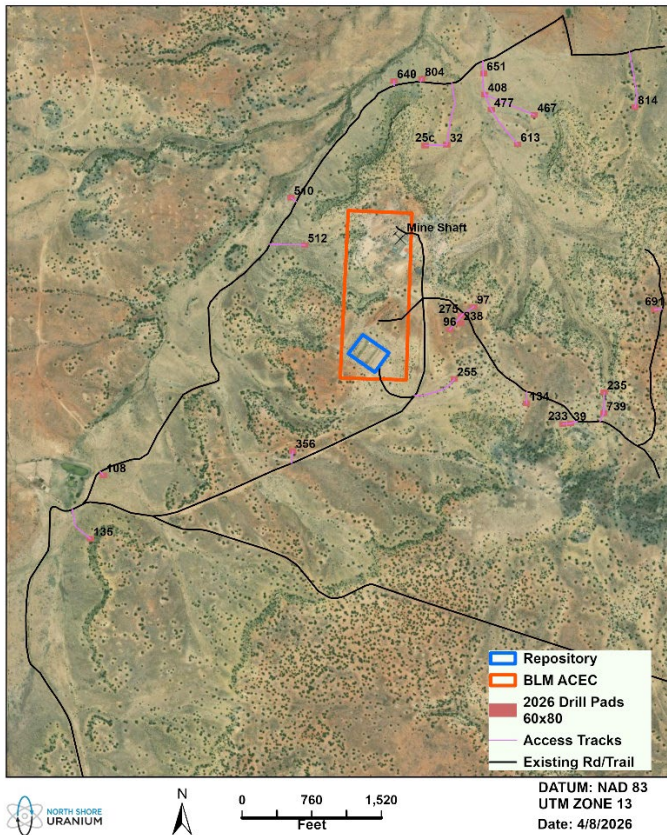


Figure 1 Approved Drilling plan

	sqm	acres	notes
Total footprint	18,139	4.48	
Individual footprint			
Drill pad	11,596	2.86	
Track	8,403	2.08	
	19,999	4.94	
Common disturbance (track and drill pad in the same place)	1,860	0.45	
Therefore			
Drill pad	11,596	2.86	(unchanged)
Track	6,543	1.62	(connect drill pad boundaries with tracks), approx. 4,704 ft.
Total	18,139	4.48	

FIGURE 2 DISTURBANCE CALCULATOR

Rynas, Samantha, EMNRD

From: Angel, Christopher, OSE
Sent: Wednesday, April 22, 2026 8:50 AM
To: Rynas, Samantha, EMNRD
Cc: Zemlick, Katie, OSE; Swanson, Gaige, OSE; Kindel, Sharon, OSE
Subject: RE: OSE technical Comments Noth Shore Uranium SA023EM

Good Afternoon Samantha,

The New Mexico Office of the State Engineer (OSE) Statewide Projects Bureau (Statewide) has completed a review of SA023EM, North Shore Puerco Uranium Exploration Project in Sandoval County. The review of this application found the following:

- 1) Two drillers license numbers are listed in Section 4 of the “Minimal Impact Exploration Operation – Permit Application”.
 - a. NMAC (2017) requires boreholes that encounter groundwater to have a New Mexico Licensed Water Well Driller or a New Mexico Licensed Drill Rig Supervisor on-site during all drilling, completions and plugging operations.
- 2) Based on a review of well logs in the area these boreholes will encounter multiple aquifers. Some of the aquifers have artesian pressure.
 - a. High solids bentonite has approximately 0.2 pounds per square inch of shear strength (Ogden and Ruff, 1991). The artesian pressure of the aquifer and the shear strength of high solids bentonite may allow groundwater to flow between aquifers.
 - b. Therefore the boreholes must be plugged with an OSE approved cementitious sealant tremied from the bottom of the borehole to ground surface.
- 3) In Section 5 of the “Minimal Impact Exploration Operation – Permit Application” the source of water for drilling is a “Local water well”
 - a. This does not identify the well or the water right that is going to be used to obtain the necessary water for drilling.
 - b. The well must have a valid water right that allows the water to be used for drilling or have a commercial water right.

Conclusions

In conclusion:

- 1) An individual with a valid New Mexico water well driller license or a valid New Mexico drill rig supervisor license must be on site during all drilling, completion and plugging activities.
- 2) The boreholes must be plugged with an OSE approved cementitious sealant that is tremied from the bottom of the borehole to ground surface.
- 3) The OSE cannot determine if the “Local water well” has the appropriate permits to allow for this use.
 - a. Water used for the drilling and plugging of the boreholes must be obtained from an appropriately permitted source.
 - b. Please contact the District 1 Office of the State Engineer at 505-383-4000 to aide you in determining if the “Local water well” identified in Section 5 has the appropriate permits to allow for this use.

References

- NMAC (2017) “New Mexico Annotated Code Title 19 -Natural Resources and Wildlife; Chapter 27 – Underground Water; Part 4: Well Driller Licensing; Construction, Repair and Plugging of Wells,” in *New Mexico Register*. Issue 11. New Mexico.
- Ogden, F.L. and Ruff, J.F. (1991) “Setting Time Effects on Bentonite Water-Well Annulus Seals,” *Journal of Irrigation & Drainage Engineering*, 117(4), pp. 242–250.

Sincerely,

Christopher E. Angel, PG
Bureau Chief
New Mexico Office of the State Engineer
Statewide Projects Bureau
Bataan
407 Galisteo St., Suite BE05
Santa Fe, NM 87504-5102
Cell: 505-469-1796

Samantha,

Here are the comments I sent North Shore and their responses.

-Leighandra

Leighandra Keeven

Geologist
Bureau of Land Management
Rio Puerco Field Office
(505) 761-8771

From: Keeven, Leighandra K <lkeeven@blm.gov>
Sent: Monday, March 30, 2026 1:10 PM
To: Brooke Clements <B.Clements@northshoreuranium.com>
Subject: Re: [EXTERNAL] North Shore Uranium NOI

Hi Brooke,

I have done a review of the NOI and have a few comments/ questions:

1. Under drilling procedures it is mentioned that there will be a staging area. This staging area is not identified on the map. Where will this be located and will it be additional surface disturbance?
2. The NOI states that the drill cuttings will be dewatered using a shaker table and then disposed in a pit. It also states under the reclamation plan that the drill cuttings and drill fluid will be buried. Will the drill fluids be buried with the dewatered drill cuttings?
3. What is the total bond amount? You have listed 2 different amounts. The BLM and MMD will joint bond for one total amount. Usually whichever is higher.
4. Do you have any GIS data for the drill hole locations and roads?

If you have any questions please let me know.

Regards,

Leighandra

Leighandra Keeven

Geologist
Bureau of Land Management
Rio Puerco Field Office
(505) 761-8771

Hi Leighandra,

Thanks for the quick comments. Following are responses to your queries.

I will send you the hard copy NOI today. When we were on site, I think you mentioned that you took a water sample from one of the mine vents. Can you share the results of those analyses with me?

Staging Area

Saturday we had two representatives from the drill contractor on site and we looked at 26 of the 27 sites. We discussed a staging area. We will not need a big area. The main items to be placed there would be a trailer, a porta-potty and potentially a few pallets. We are thinking we want to put it in that flat area by the corral on BLM land where we met with you all. That area is pretty much already disturbed. If we were to classify it as not disturbed, there would probably be an additional .05 acres or so of new disturbance.

Cuttings and Drill Fluid

Yes, our current plan is to first put the drill cuttings in the bottom of the pit, and after the grouting of the hole, the drill fluid on top. We would let the material in the pit dry/evaporite/solidify before backfilling the fenced-in pit.

We discussed the pits and cuttings/fluid disposal with the drillers on Saturday. After the visit I've also had some dialogue with Samantha and Amber regarding potential liners in the pits. Samantha stated that they have yet to resolve lining vs. no lining of the pits and asked me if we thought we could pull a liner from the pit after it was full. If a liner is required, we would prefer some kind of porous fabric that would help with drying the material in the pit over plastic. Following are the comments I sent to Samantha and Amber yesterday:

"It would be very difficult to pull a liner of any material without ripping it up. There will be over 5 cubic yards of material and drill fluid on top of it at the end of the hole. That is a lot of weight.

If a liner is required we will almost certainly have to leave it in the pit and bury it. Some kind of porous fabric would be much better to help with drying the wet material in the pit prior to backfilling.

We don't think a liner is necessary. The water table is at least 175 ft. down at its shallowest. When we are finished we want material to dry as rapidly as possible as we want the pits backfilled as soon as possible. I don't think that a little water percolating a limited distance into the upper formation would be harmful to the environment."

Bond

Getting the bonding right will take some discussion with the State/BLM. I gave you those estimates based on a formula provided to me by Samantha (see attached spreadsheet) I believe you said that you typically bond for one drill hole, that is why I had that amount for a drill hole.

The State now has a bonding requirement of \$25/ft. for grouting. They recently raised that rate. Based on that, and the surface disturbance, the total bond would be approximately \$533,022 (see attached spreadsheet) Samantha stated that we might be able to work something out where we post a bond for say 10 holes. After we have plugged say 7 or 8 of the holes, and submit paperwork to the state, they would authorize drilling of that number of holes beyond the original 10. If a 10 hole "rolling bond" is approved, the bond amount would be \$224,897. I look forward to discussing the bond in detail with the BLM and the state.

GIS Data

Yes we can provide you with good GIS data. Hope to get that to you by end of day today.

www.northshoreuranium.com

Cheers,

Brooke

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Erin Taylor
Acting Cabinet Secretary

Benjamin Shelton
Deputy Cabinet Secretary

Laura McCarthy, State Forester
Forestry Division



March 16, 2026

Samantha Rynas, Permit Lead
Mining and Minerals Division
Energy, Minerals and Natural Resources Department (EMNRD)
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Request for Review and Comment on Permit No. SA023EM, North Shore Rio Puerco Uranium Exploration Project in Sandoval County, NM

Thank you for the opportunity to comment on the above referenced project. I do not anticipate any impacts to State Endangered or Federally Endangered or Threatened plants as a result of this project, as described in the application.

Please let me know if I can be of further help.

Sincerely,

A handwritten signature in blue ink that reads "Erika Rowe".

Erika Rowe

Endangered Plant Program Coordinator
EMNRD-Forestry Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505
erika.rowe@emnrd.nm.gov
(505)699-6371

GOVERNOR
Michelle Lujan Grisham



DIRECTOR AND SECRETARY
TO THE COMMISSION
Michael B. Sloane

STATE OF NEW MEXICO DEPARTMENT OF WILDLIFE

One Wildlife Way, Santa Fe, NM 87507

Tel: (505) 476-8000 | Fax: (505) 476-8180

For information call: (888) 248-6866

<https://wildlife.dgf.nm.gov>

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Albuquerque

31 March 2026
Samantha Rynas, Permit Lead
Mining Act Reclamation Program
Mining and Minerals Division (MMD)
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: *Minimal Impact Exploration Permit Application, North Shore Rio Puerco Uranium Exploration Project, Sandoval County, New Mexico, Permit No. SA023EM; NMDGF No. NMERT-5684.*

Dear Ms. Rynas,

The New Mexico Department of Wildlife (Department) has reviewed the proposed uranium exploration project referenced above. North Shore Uranium Ltd. (North Shore) is proposing to drill 27 exploration bore holes, ranging from approximately 625 to 875 feet deep, from a total of 27 drill pad sites. The project area is located on land administered by the U.S. Bureau of Land Management (BLM) in Township 12N, Range 3W, Section 18 and Township 12N, Range 4W, Section 24. The proposed exploration project is anticipated to disturb a total area of approximately 4.6 acres. MMD conducted an Agency site inspection on 24 March 2026 that staff from the Department were unable to attend. Department staff conducted a site inspection on 26 March 2026.

The habitat of the project area can generally be categorized as juniper (*Juniperus* spp.) savanna. This habitat type likely supports breeding populations of gray vireo (*Vireo vicinior*), which is state-listed as threatened in New Mexico and is also identified as a Species of Greatest Conservation Need in the State Wildlife Action Plan for New Mexico. During the site inspection, Department staff observed a vent shaft from historic underground uranium mining operations that is bat-gated, suggesting that bat activity is likely in the project area. The vent shaft is near several proposed drill pad locations.

The permit application states that North Shore will use mud/fluid drilling techniques. Mud pits create an entrapment hazard for both terrestrial and volant wildlife species and should be fenced and covered by solid metal, plywood, or netting to exclude birds and bats. If netting is used, the Department recommends extruded plastic, knit, or woven netting. Monofilament netting should never be used due to its tendency to ensnare wildlife, usually resulting in injury or death. Netting material must be held taught over a rigid and adequately supportive frame to prevent sagging into the mud pits. Mesh size for both fencing and netting should not be larger than three eighths of an inch to exclude smaller animals.

The Department also strongly recommends that North Shore considers using a closed-loop drilling system. Closed-loop systems eliminate the need to build fences, install netting, or use other materials to exclude wildlife from mud pits; reduce the amount of surface disturbance associated with the drill pad site; and consume significantly less water.

During drilling operations, it is also important to prevent wildlife from entering and becoming trapped in stockpiled drill pipes. Capping piping is the most effective way to prevent wildlife entry. At a minimum, the Department recommends that each section of pipe should be visually inspected prior to use to verify that wild animals are not inside.

To minimize the likelihood of adverse impacts to migratory birds, nests, eggs, or nestlings, the Department recommends that ground disturbance and vegetation removal activities be conducted outside of the primary migratory bird breeding season. This season runs from 15 April - 1 September for upland songbirds, willow flycatcher (*Empidonax traillii*), yellow-billed cuckoo (*Coccyzus americanus*), and other riparian songbirds; 1 March - 1 September for most raptors; 1 January - 15 July for golden eagle (*Aquila chysaetos canadensis*) and great horned owl (*Bubo virginianus*); and 1 March - 15 September for low-elevation deserts. If ground disturbing and clearing activities must be conducted during the breeding season, the area should be surveyed for active nest sites (with birds or eggs present in the nesting territory) and avoid disturbing active nests until young have fledged. For active nests, establish adequate buffer zones to minimize disturbance to nesting birds. Buffer distances should be at least 100 feet from songbird and raven nests; 0.25 miles from most raptor nests; and 0.5 miles for ferruginous hawk (*Buteo regalis*), golden eagle, peregrine falcon (*Falco peregrinus*), and prairie falcon (*Falco mexicanus*) nests. Active nest sites in trees or shrubs that must be removed should be mitigated by qualified biologists or wildlife rehabilitators. Department biologists are available to consult on nest site mitigation and can facilitate contact with qualified personnel.

The Department concurs with the proposed BLM-specified seed mix listed in the permit application and recommends that only certified weed-free seeds be used to avoid inadvertently introducing non-native species to the reclamation site and that sterile seed sources not be used. Any alternative plant species, used to substitute for primary plant species that are unavailable at the time of reclamation, should also be native. When possible, the Department recommends using seeds that are sourced from the same region and habitat type as the reclamation site and suggests including seeds from a region that represents potential future climatic conditions at the site.

Thank you for the opportunity to review and comment on the proposed uranium exploration project. If you have any questions, please contact Ron Kellermueller, Mining and Energy Habitat Specialist, at (505) 270-6612 or ronald.kellermueller@dgf.nm.gov.

Sincerely,

Virginia Seamster, Ph.D.
Assistant Chief
Wildlife Management Division, Ecological and Environmental Planning Section

cc: USFWS NMES Field Office

From: [Ficke, Cash, DCA](#)
To: [Rynas, Samantha, EMNRD](#)
Subject: RE: North Shore Uranium Exploration SA023EM
Date: Monday, April 13, 2026 11:39:43 AM

Hi Samantha,

I don't believe I had any comments; I searched through my files and didn't find anything.

Cash



Cash M. Ficke, RPA
Archaeologist
Historic Preservation Specialist &
Archaeological Review
Historic Preservation Division
Office: (505) 827-6162
Cell: (575) 937-0750
Email: cash.ficke@dca.nm.gov
www.nmhistoricpreservation.org

From: Rynas, Samantha, EMNRD <Samantha.Rynas@emnrd.nm.gov>
Sent: Monday, April 13, 2026 11:31 AM
To: Ficke, Cash, DCA <cash.ficke@dca.nm.gov>
Subject: North Shore Uranium Exploration SA023EM

Good Morning, I thought I had seen a response to technical comment from you on this project, but I can't seem to find it.

Can you confirm if you had a comment on this project, and re-send the comments?

Samantha Rynas
Reclamation Specialist
Mining and Minerals Division
Mining Act Reclamation Program
1220 S. St. Francis Drive
Santa Fe, NM 87505
(505) 216-8945
Schedule: Mon – Fri 7:30am - 4pm