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December 5, 2017

Holland Shephard
Program Manager
MMD Mining Act Reclamation Program
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Amendment to the Gulf Coast Minimal Impact Mining Permit

Dear Mr. Shephard,

Attached is a requested amendment by Gulf Coast Mining group LLC. to their Minimal Impact Mining Permit (No. OT006MN). The amendment requests that they be allowed to use a ball mill in processing ore at the Iron Duke Mine. The ball mill uses water in a closed loop system to accomplish this. Gulf Coast also requests an increase in their permitted total acreage from 7.88 acres to 9.18 acres to accommodate the machinery.

To provide the information necessary for MMD to evaluate this request, the relevant sections of the original approved application have been included. These are:

- The attachment to the Minimal Impact New Mining Permit Application (in particular; Part 5, the mining description and the Plates)

- The SWPPP (in particular; Section 2.0 , potential pollution sources and the Plates)

Please let us know of any questions, requests, or comments.

Sincerely,

David J. Hamilton

David Hamilton
R.T. Hicks Consultants, Ltd.

ATTACHMENT

AMENDED ATTACHMENT TO MINIMAL IMPACT NEW MINING OPERATION
IRON DUKE, CINCO DE MAYO, VIRGINIA, AND BARBARA PATENTED CLAIMS
OTERO COUNTY, NEW MEXICO

The following is an amendment to the Minimal Impact Mining Application for the Iron Duke Mine. The purpose of the amendment is to allow some processing to be implemented on the Bottom Pad (see Table 1 and Plates). To this end, an enlargement of the pad is requested along with placement of the equipment on the enlarged pad. Effected parts of the Application are presented below.

Part 5:MINING DESCRIPTION (§304.D.4)

Section C

The facilities for the mining/reclamation operation are described below, identified in Plates 2 and 3, and presented in tabular form in Table 1. The Area Numbers shown in the left column of Table 1 are plotted on Plate 3.

Pad 3 is the proposed location for the processing to occur. This pad was originally 0.56 acres in area. The enlarged area is 1.86 acres in area. Hence, the pad is enlarged by 1.30 acres in area. This results in an amended total area disturbed, reclaimed and improved of 9.18 acres.

Table 1: Summary of areas disturbed or improved

Area Number	Name of Area	Description	Status	Acres	Amended Additional Area	Area Subtotals
1	Upper Staging Area	Pads and staging areas	Existing	0.26		
2	Upper Iron Duke Pad	Pads and staging areas	Existing	0.20		
3	Bottom Pad (foot of Rail Grade)	Pads and staging areas	Existing	0.56	1.30	
4	Lowermost Pad (on Barbara Patented Claim)	Pads and staging areas	Existing	0.28		**2.60**
5	Cinco de Mayo Access and Upper Pad	Pads and staging areas	Proposed	0.30		**0.30**
6	Cat Path- Old Rail Grade	Roads and access	Existing	0.41		
7	Access Road to Iron Duke and Cinco de Mayo	Roads and access	Existing	1.11		
8	Upper Junction Pad (from head of access road to ID And CdM to Cat Path)	Roads and access	Existing	0.09		
9	Upper Access Road (From Junction Pad to North Side Waste Rock)	Roads and access	Existing	0.08		
10	Pad Connecting Road (connects lowermost pad and bottom pad)	Roads and access	Existing	0.16		
11	Widened Drainage Crossing	Roads and access	Existing	0.40		
12	Iron Duke Access Road (to Upper pad from north)	Roads and access	Existing	0.20		**2.45**
13	Iron Duke Waste Rock	Mining/reclamation areas	Historic	0.90		
14	North Side Waste Rock (Cinco de Mayo and Iron Duke)	Mining/reclamation areas	Historic	2.27		**3.17**
15	Lower Iron Duke Pad	Pads and staging areas	**New**	0.28		
16	Access Road to Lower Iron Duke Waste Rock	Roads and access	**New**	0.38		**0.66**
	Total Area Improved, Reclaimed, Disturbed			**7.88**		**9.18**

At the site, two historic mine waste dumps are being mined/reclaimed. These are:

- An area approximately 60 yards by 100 yards (0.9 acres) south of the east-west centerline of the Iron Duke Claim (see Plates 2 and 3). This area contains approximately 2 million tons of low grade iron mixed with quarry rock/limestone.
- An area north of the east-west centerline of the Iron Duke and Cinco de Mayo Claims which is approximately 100 yards by 100 yards (2.27 acres) This area also contains approximately 2 million tons of low grade iron mixed with quarry rock/limestone and are identified as mining areas on Plates 2 and 3.

No new pits, quarries or stockpiles will be constructed. The quarry rock/limestone will be milled on the pad to allow a better sorting between iron materials and limestone materials. Both are removed from the site as products. Therefore, the proposed on-site milling will not create any waste dumps, as was the previous case. Some of the rock in the historic waste dumps is "country rock" and is most probably quartz monzanite. This country rock will be left in place or replaced in the area of the historic dump as part of the waste dump reclamation program described in a separate section.

Section D

The proposed milling of the iron ore and quarry rock/limestone from the waste dump will use a ball mill. The ball mill uses water as fluid to assist in the milling operation. The ground material exits the ball mill as a slurry. It is next pressed through a mat to separate the fluid from the milled materials. The milled materials are removed from the mat for shipping while the fluid is sent to a mobile steel fluid cell. Due to minimal residual moisture in the ground material and evaporation of fluid in the steel fluid cell, there is some fluid loss. This loss is made up as necessary by addition of water to the mobile steel fluid cell. There is no fluid discharge as the process is closed loop by design.

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Section E

A bulldozer and ¾-cu yd front-end loader will be used to move and load quarry rock/limestone and iron ore from the dumps to processing pads. The front-end loader will place quarry rock/limestone and iron ore into trucks for export. The material is being trucked out of state for separation, processing, and shipment to the customers.

The front end loader will also be used to move materials selected for milling into the ball mill hopper. Depending upon mass, it may also be used to move milled output into trucks for shipping.

Part 6: GROUND WATER INFORMATION (§304.D.5)

Section A

The Office of the State Engineer lists 4 wells in the general area of the mining/reclamation project (Plate 1). All of these wells are in the aptly named Water Canyon drainage. The OSE database provides a measured depth to water for three of the wells at distances between about 2 miles and 3.5 miles northeast of the site. The depth to water in the closest well is 74 feet. Depths to water at the more distant wells are 70 feet and 400 feet. We conclude that the "shallow" wells are completed within the stream alluvium and fan deposits and the "deep" well accesses a "regional" aquifer. The OSE database does not contain information about the quality of water in these wells.

The patented mining claims are located close to and within the outcropping bedrock of the Jarilla Mountains, the Monzonite Stock (Tm) in Figure 1 (below). Quaternary Alluvium (Q) is mapped east of the patented mining claims and this deposit probably contains limited ground water in the area shown by the blue oval. In our opinion, the Monzonite Stock is not an aquifer and ground water, as defined by New Mexico Regulations, is not present beneath the proposed mining/reclamation project.

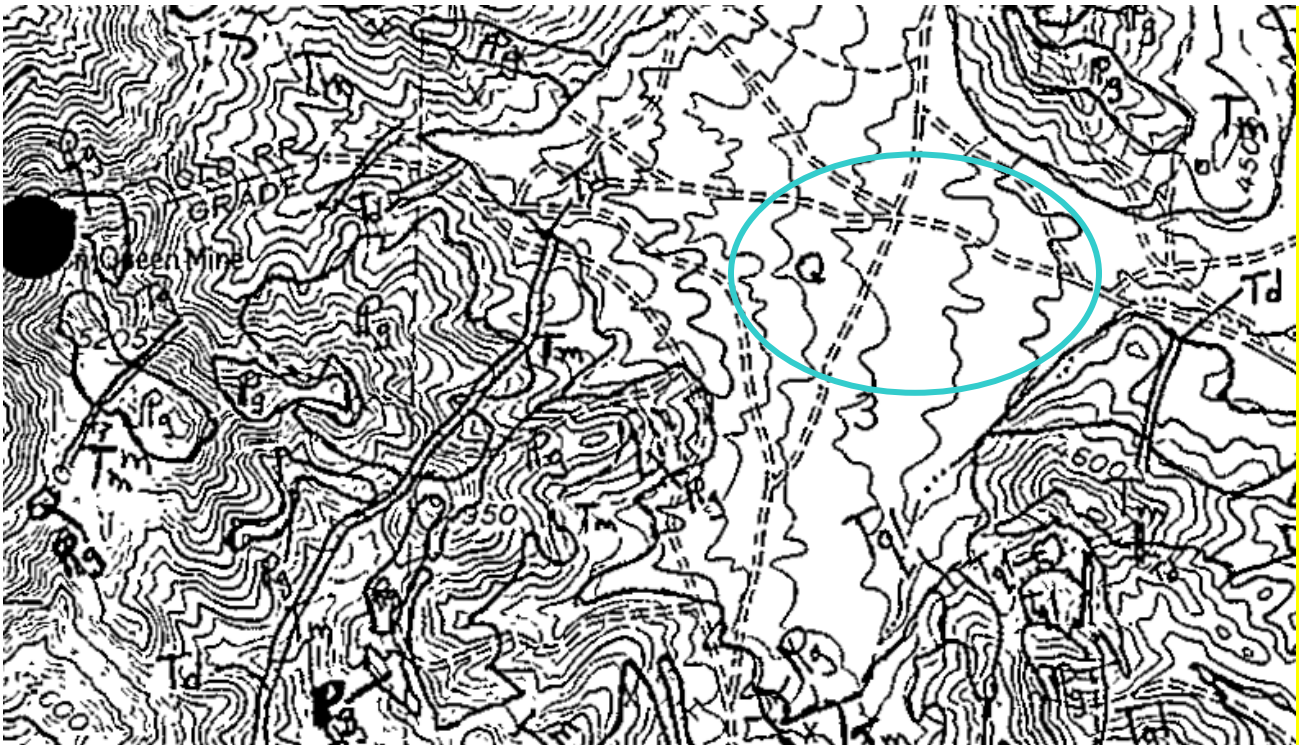


Figure 1: Geologic map of area of the patented mining claims (from http://geoinfo.nmt.edu/publications/openfile/downloads/OFR300-399/351-375/370/ofr_370.pdf)

Section B
The source of ground water information is the OSE database, the geologic map (Figure 1) and our site visit.

Section C
No dewatering activities are associated with the mining/reclamation project.

Part 7 PERFORMANCE **STANDARDS (§304.D.7)**
Section A
The initial phase will remove and reclaim the historic Iron Duke Waste Rock Dump. After the Iron Duke Waste Rock Dump is removed and reclaimed, operations will commence on the North Side Waste Rock Dump. The company will remove the ore and quarry rock/limestone from the waste dumps in operational sections of about 200 feet by 200 feet at a time. The active area of the waste dump will be maintained with concave slopes in order to retain storm water runoff and minimize erosion during removal of the waste dump. A bulldozer and front end loader will move the waste dump rocks to a working pad for removal.

Some dust will occur from the front-end loader operation. The NM Air Quality Bureau has granted the company permits for its equipment. Operations are conducted within the permit guidelines.

We believe that removing the historic waste rock dumps will have a long-term positive impact to the existing environment. The existing plant species, greasewood, scrub mesquite, a few cacti, and grasses will re-establish themselves on the area after reclamation. A portable toilet will be installed on site and periodically serviced. There will be no chemicals or explosives used on the site. Diesel fuel (or gasoline) for the motors will be brought to the site daily in approved containers by the work crew. Common trash will be collected in a barrel and periodically removed to a landfill.

The operation will be partially visible from US Hwy 54, about three miles to the east. The sound of the plant-operating motors will only be noticeable as the operating area is approached.

Sections B and C

A gate and fence will be placed at the entry to the mining/reclamation project. Appropriate signage will be placed in various areas at the entrance to the project and in the operating areas advising the public of "Private Property" and "Mining and Reclamation Operations".

Workers will receive annual training and recertification under MSHA Part 48. This is currently handled by the New Mexico Bureau of Mine Safety situated in Socorro, NM.

The nature of the mining/reclamation operation does not pose a threat to wildlife or stock.

Sections D and E

As the historic mine waste rock is removed from the hillside, the company will implement the reclamation plan as outlined in this submission. The method of mine dump removal described above combined with implementing the reclamation plan during waste rock removal will minimize the addition of suspended solids to arroyos and control erosion.

Access and staging pads will be sloped toward small basins that will trap any sediment entrained in sheet flow. Overflow from the catch basins is directed to the natural arroyos. These practices will be described in a Notice of Intent for an NPDES Storm Water Multi-Sector General Permit to be submitted to the USEPA for the project. A pollution prevention plan will be prepared providing for best-management practices to ensure minimal impact of the project on vicinity surface-water quality.

Part 5 RECLAMATION PLAN (304.D.8)

Section A, B, C

The area currently is grazed by wildlife. After mining/reclamation is complete, the areas will remain available to wildlife. Reclamation activities will restore the original pre-mining topography to areas outside of the patented mining claims. Pads and roads on the patented mining clams will be re-seeded after the project is complete to minimize erosion and sediment loading to arroyos.

At this time, the company is not aware of any cultural resources in the area of the proposed action.

Section D

No backfilling is proposed.

Section E

This project involves removing the waste dumps and does not use blasting, excavation or any disturbance of in-place ore. The project is essentially removing the impact of past mining activity and, as a result, restoring the hydrologic balance (as much as practical) to conditions that existed before mining began, about a century ago.

As mentioned earlier, slope stabilization and reclamation will occur concurrently with the removal of the waste rock dumps. As the waste rock is removed in 200 by 200 foot sections, large cobbles of country rock will be placed within obvious drainage channels to control erosion. Additionally, at vertical intervals of 50 feet, small berms comprised of country rock cobbles will be anchored in shallow trenches laterally cut across the hill side to slow and direct storm water runoff. On the uphill side of these berms, waddles will be staked across the footing of the berm to control movement of fine-grained materials. Country rock aggregate will be left to armor the slopes between the berms as available.

The intent of this reclamation is to re-establish the pre-mining drainage patterns that existed about a century ago.

Section F
The historic mining activities did not salvage topsoil. The proposed removal of the waste rock dumps will expose the original land surface covered by the dumps about a century ago. We believe the soil thickness of the newly exposed surface will be thin. Many areas beneath the dumps may exhibit no topsoil. Creating new topsoil or preserving any topsoil beneath the historic dumps will be challenging.

Section G
Following the grading, contouring and berming described above, the company will carefully examine the nature of residual soil. At this time, we do not anticipate that seed bed preparation (e.g. scarification) will provide any benefit.

Sections H, I and J
Plant species used for reseeding are those recommended by the Bureau of Land Management for the Orogrande area (Jarilla Mountains). The application rate is that suggested for broadcast seeding is presented in Appendix A. Given the slope of the site and wind conditions, mulch will probably not provide a benefit.

Sections K and L
No buildings will be erected on the site. All of the operating equipment is mobile and will be removed when mining is completed.

New roads and pads at the site are the Access Road to road to the Lower Iron Duke Waste Rock, the Lower Iron Duke Pad, and will later include the Cinco de Mayo Access and Upper Pad on the Cinco de Mayo claim (Area Numbers 16, 15, and 5 on Plate 3). Existing roads and accesses at the site have been graded to make them usable to equipment. All roads will be graded and bermed appropriately to control runoff events. Areas are provided in Table 1.

Roads and pads on the patented mining claims will be left graded and bermed appropriately to control runoff events.

After completion of all activies on the patented mining claims, the Access Road to the Lower Iron Duke Waste Rock and the Lower Iron Duke Pad, which are not located on the patented claims, will be regraded to original contour and re-seeded.

Section M
Reclamation of the waste dump areas will occur concurrently with removal operations. All other reclamation will occur within 1 year of cessation of completion of activies on the patented mining claims. Reclamation and re-seeding of roads and pads not located on the patented mining claims that are no longer used will occur in the later half of summer to take advantage of the late summer moisture pattern.

Part 10 Financial Assurance and Permit Fees (304.E &F)
Part A
As described in this submittal, the project will remove historic mine dumps and reclaim the hillside beneath the dumps. In order to accomplish the removal, existing roads and former processing pads have been graded and improved to allow movement and placement of equipment. All of the work described in this submittal occurs on patented mining claims except about 1.2 acres of construction that occur on mining claims controlled by the company:

1. New Lower Iron Duke Pad (0.28 acres)_
2. New road connecting the Iron Duke pad to the existing road (0.38 acres)
3. Improvement and widening of about half of existing access road to the Iron Duke and Cinco de Mayo claims (about 0.5 acres)
4. Improvement of the existing road between the lowermost pad on the Barbara Claim to the pad at the base of the former Railroad Grade (about 0.1 acres)

Reclamation of this one acre of disturbed land on BLM surface consists of re-grading the road and pad to the approximate original condition and re-seeding. Based upon experience with reclamation of similar drilling pads and roads associated with oil and gas exploration, the cost of restoring this one acre area is about $5,000.

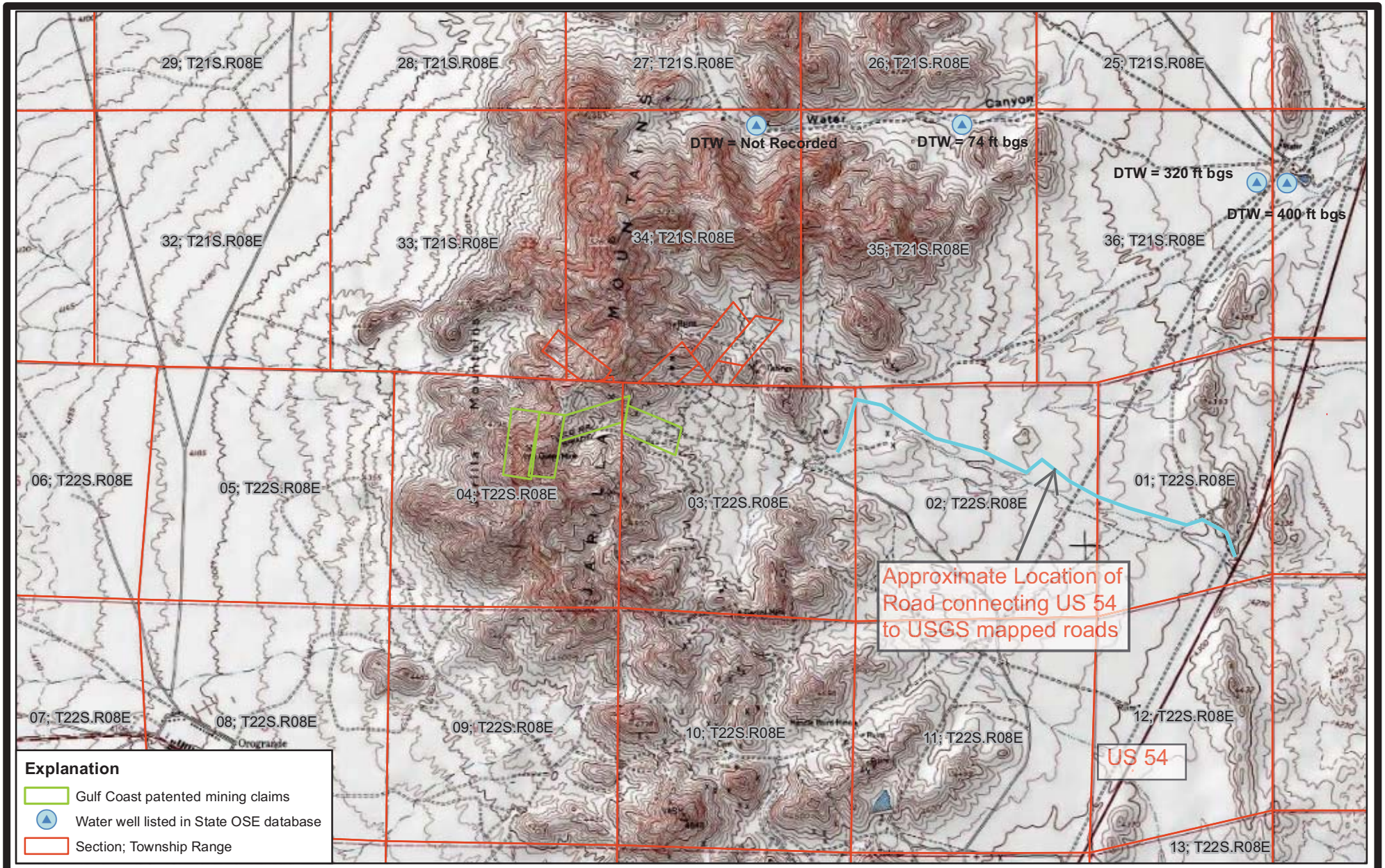
On the patented mining claims, which are private property, "reclamation" should not be required. Rather:

- the waste dump removal effort must proceed according to the plan outlined above to minimize contribution of suspended solids to surface waters (arroyos)
- improved pads must be constructed as proposed above, sloping to small sediment catch basins
- improvements to the existing roads should include structures to minimize erosion and contribution of sediment to surface waters.

An inspection of the active project by MMD to verify that the project is proceeding according to this plan could eliminate any requirement for financial assurance.

PLATES

Path: S:\Projects\gulfCoast\oroGrande\Plates\plate1.mxd



Base Map: esri.com

N W E S

0 1,500 3,000 Feet

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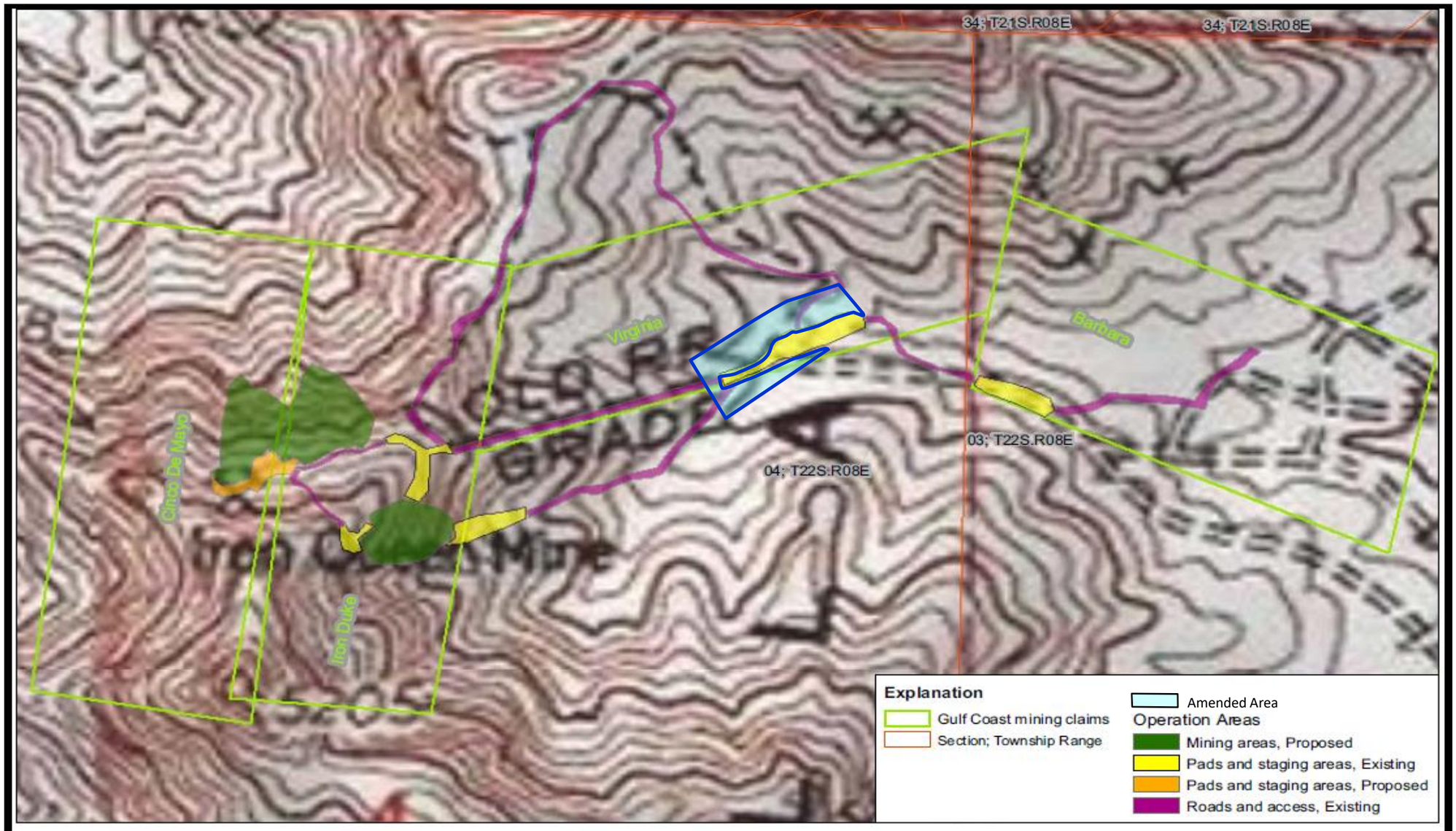
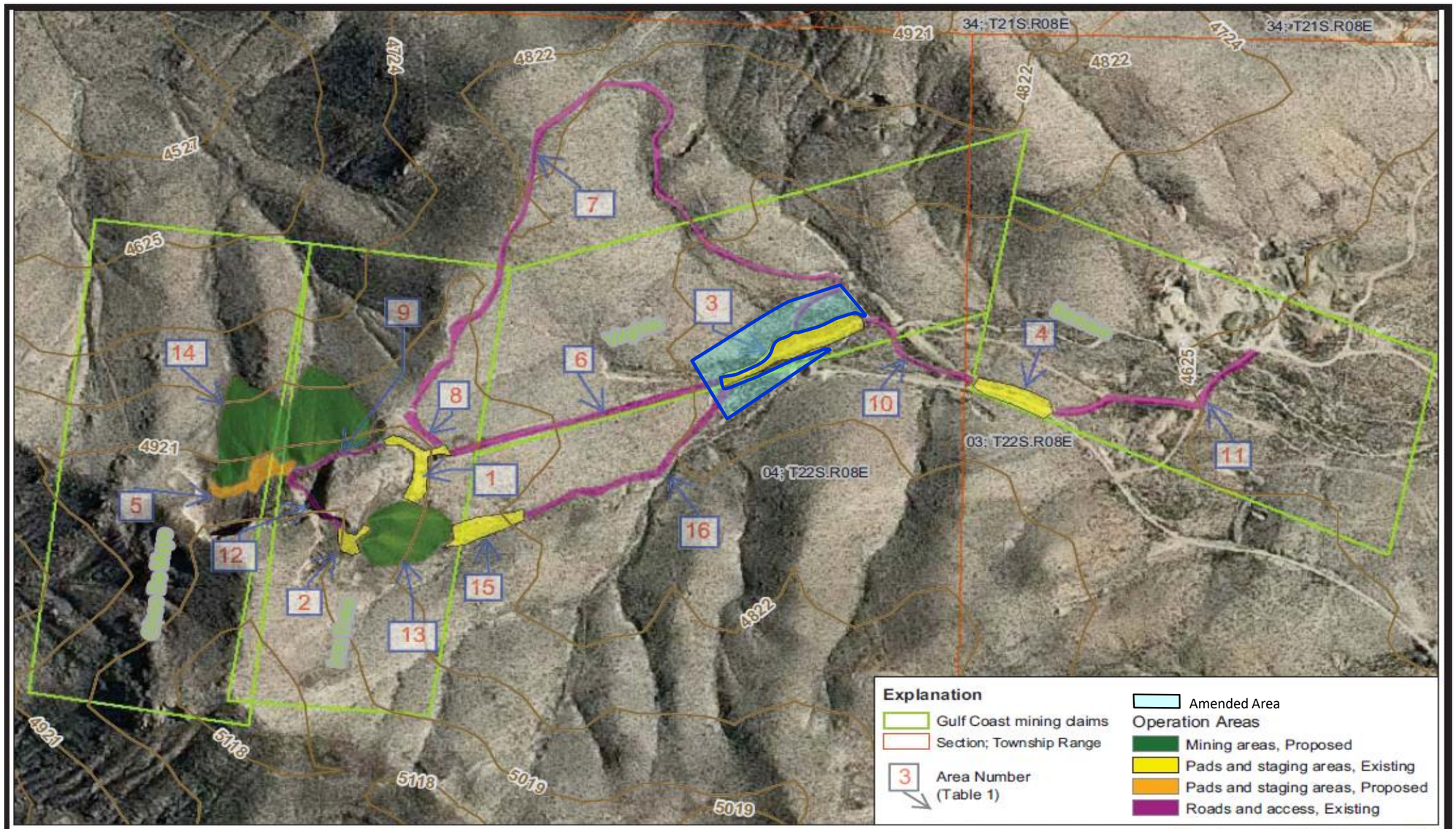
USGS Topographic Map With MS Claim Overlay | Plate 1

Gulf Coast Mining Group, LLC
Barbara, Cinco de Mayo, Iron Duke, & Virginia MS Claims | Nov., 2017



Base Map: esri.com

R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW Suite F-142 Albuquerque, NM 87104 Ph: 505.266.5004	USGS Topographic Map with MS Claim Overlay and Existing and Proposed Operation Areas	Plate 2
	Gulf Coast Mining Group, LLC Barbara, Cinco de Mayo, Iron Duke, & Virginia MS Claims	Nov.,2017



Base Map: RGIS, EDAC UNM

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Aerial Photograph with MS Claim Overlay; Existing and Proposed Operation Areas; and Contours	Plate 3a
Gulf Coast Mining Group, LLC Barbara, Cinco de Mayo, Iron Duke, & Virginia MS Claims	Nov.,2017

Area Number	Name of Area	Description	Status	Acres	Amended Additional Area	Area Subtotals
1	Upper Staging Area	Pads and staging areas	Existing	0.26		
2	Upper Iron Duke Pad	Pads and staging areas	Existing	0.20		
3	Bottom Pad (foot of Rail Grade)	Pads and staging areas	Existing	0.56	1.30	
4	Lowermost Pad (on Barbara Patented Claim)	Pads and staging areas	Existing	0.28		**2.60**
5	Cinco de Mayo Access and Upper Pad	Pads and staging areas	Proposed	0.30		**0.30**
6	Cat Path- Old Rail Grade	Roads and access	Existing	0.41		
7	Access Road to Iron Duke and Cinco de Mayo	Roads and access	Existing	1.11		
8	Upper Junction Pad (from head of access road to ID And CdM to Cat Path)	Roads and access	Existing	0.09		
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11	Widened Drainage Crossing	Roads and access	Existing	0.40		
12	Iron Duke Access Road (to Upper pad from north)	Roads and access	Existing	0.20		**2.45**
13	Iron Duke Waste Rock	Mining/reclamation areas	Historic	0.90		
14	North Side Waste Rock (Cinco de Mayo and Iron Duke)	Mining/reclamation areas	Historic	2.27		**3.17**
15	Lower Iron Duke Pad	Pads and staging areas	**New**	0.28		
16	Access Road to Lower Iron Duke Waste Rock	Roads and access	**New**	0.38		**0.66**
	Total Area Improved, Reclaimed, Disturbed			**7.88**		**9.18**

R.T. Hicks Consultants, Ltd **901 Rio Grande Blvd NW, Suite F-142** **Albuquerque, NM 87104** **505-266-5004**	**Identifiers for Plate 3A**	**Plate 3B**
	Gulf Coast Mining Group, LLC. **Barbara, Cinco de Mayo, Iron Duke, & Virginia MS Claims**	**November, 2017**

December, 2017

Iron Duke Project

Amended SWPPP

Prepared for:

Gulf Coast Mining Group, LLC

R.T. Hicks Consultants, Ltd.

901 Rio Grande Blvd. NW, Suite F-142, Albuquerque, NM 87104

Plates:

Appendix

1.0 Introduction

The Iron Duke Project is a mining/reclamation project being undertaken by Gulf Coast Mining Group, LLC. The Iron Duke Site is located about 35 miles south of Alamogordo, New Mexico in Otero County. The four patented mining claims are contained in Sections 3 and 4 of Township 22S, Range 8E and have a combined area of approximately 75 acres (see Plates 1 and 2). Surface methods will be used to remove historic waste rock dumps from the patented mining claims. The waste rock dumps cover approximately 3.2 acres of the patented claims (Plate5).

The site is located within the Jarilla Mountains; an isolated uplift near the southern end of the Tularosa Basin floor, The Tularosa Basin is a closed basin measuring about 120 miles north to south and almost 50 miles east to west within the Basin and Range Physiographic Province.

The terrain of the Jarilla Mountains ranges from steep bedrock slopes leading to alluvial drainages and fans at the foot of the mountains. There are no mapped US waters within the drainages containing the site. Closest designated United States waters are separate drainages more than two miles north of the site (Water Canyon on Plate 2).

Because of location, the Iron Duke Project cannot discharge storm water to municipal storm sewer systems or to waters of the United States. According to EPA docket number 833-R-008 dated June 1996, facilities not discharging to municipal storm sewer systems or to waters of the United States do not need a National Pollutant Discharge Elimination System (NPDES) permit. The potential for storm waters to transport sediment from the Iron Duke site during an extreme event prompted Gulf Coast Mining Group, out of good faith, to produce a Storm Water Pollution Prevention Plan (SWPPP). For purposes of storm water pollution prevention, this SWPPP was prepared according to applicable EPA regulations and guidance. The plan describes the implementation of practices used to reduce potential pollutants in storm water and ensure permit compliance. As NPDES regulations are revised, changed or superseded, Gulf Coast Mining Group shall update this plan.

Section 2 contains a discussion of the potential sources for pollution of storm water. Section 3 presents current and planned pollution prevention measures and controls as well as training and inspection procedures. Section 4 covers monitoring and reporting.

The Appendix includes forms and checklists for periodic inspections.

2.0 Potential Pollution Sources

This section summarizes the potential pollutant sources at the Iron Duke site. The majority of the site is located in an eastward flowing drainage. A portion of the site, to be mined later, drains to the north and then to the west (see Plate 2 and 3).

2.1. Applicability

Land area disturbed at the site for the purpose of removing the rock will be between 5 and 10 acres. As the primary activity is removal of non-metallic rock, the site is covered by Section J of the General Permit. Storm water discharges from the areas where materials are exposed to storm water are subject to the requirements of the General Permit.

2.2. Potential Pollutants

The mining process will use heavy equipment to move the iron ore quarry rock/limestone from the site. There will be no chemicals or explosives used on the site. Diesel fuel (or gasoline) for the motors will be brought to the site daily in approved containers by the work crew.

All crushing of iron ore and quarry rock/limestone from the waste dump will be dry.

A ball mill will be used for a finer crushing of some of the materials. The ball mill uses water as a fluid to assist in the milling operation in a closed loop process. Water is lost through evaporation and with export of the finely ground material. Hence, additional water is added to the steel fluid cell as necessary. No fluid is discharged.

No buildings or structures are to be constructed at the site.

No impervious surfaces exist at the site or will be constructed at the site,

2.3. Storm Water Drainage

Current and planned activities on the patented claims will disturb about 9.2 acres (Plate 3). Most of this area is contained in an eastward flowing drainage. The remaining portion drains north and then west. These drainages terminate in the closed basin of the Tularosa Valley floor. All storm water runoff from the site will enter one of these drainages (see Plate 1). Storm water run on to the patented mining claims can only occur on the two easternmost claims as the two westernmost claims include the sources of the drainage basins

Of the eastern claims, the northern side of the Virginia claim can have run on from a portion of the basin above the claim. The southern boundary of this claim is formed by a ridgeline leading to a stream bottom. Hence, little to no run on is possible from the south side.

Within the Barbara claim, the principal drainage channel of the basin runs approximately through the middle of the claim. Tributaries from an area larger than this claim feed into this channel from the south and a considerably smaller area drains in from the north. None of this run on is from areas disturbed by activities at the site.

2.4. Significant Spills and Leaks

There have been no reportable spills or leaks at the site.

2.5. Risk Identification and Summary of Potential Pollutant Sources

The risk of storm water pollution from the facility is minimal. The materials potentially exposed to storm water are fluids and used in the machinery at the site: diesel, unleaded fuel, hydraulic fluids, lubricants, antifreeze, and water. The largest possible quantities cannot be greater than the capacities of the machinery plus the capacity of the maintenance vehicle.

The proposed use of the ball mill involves no new fluids from the list above. The ball mill is a closed cell process by design.

A bermed area will be constructed on the Bottom Pad (Plate 4) for parking of all machinery not parked on the pads adjacent to the waste rock piles and for servicing of the machinery. Machinery parked adjacent to the waste rock piles will have a similar bermed area constructed for parking.

During storm events, incidental spills of the above mentioned fluids from the maintenance vehicles could occur resulting in contamination of rainwater. To prevent this, these activities will not be performed during any precipitation events.

Gulf Coast Mining Group performs no other activities using fluids or other chemical substances at the site. Therefore, we conclude potential contamination to storm water discharge is unlikely.

3.0 Pollution Prevention Measures and Controls

This section describes the measures or best management practices (BMPs) used to eliminate or reduce pollutant loadings in storm water discharges from the facility. As required by the EPA storm water permit, a set of minimum or "baseline" controls are being implemented at the site. These baseline BMPs are outlined at the beginning of this section, followed by BMPs tailored to the specific sources identified at the site.

3.1. Baseline Facility-Wide Controls

The design and operation of the facility minimizes pollutants in storm runoff as follows.

- The roads, pads, and staging areas at the site are to be graded to contain and control run on and runoff.
- Roads, pads, and staging areas are "armored" through spreading or leaving in place as much country rock as possible at the site.
- All hazardous materials are brought on site by maintenance vehicles for use at the time of the visit. No on-site storage of these materials occurs.

In addition to these general conditions, there are specific site-wide practices employed to control storm water pollution.

3.2. Good housekeeping

As required by the facility's storm water permit, a variety of good housekeeping measures are conducted at the facility to prevent contamination of storm water. These measures include the following.

- Leaks and spills are cleaned up immediately
- Used fluids are promptly placed into the appropriate disposal container. These containers are removed from the site as a part of the maintenance activity.
- All trash containers are kept closed to prevent rainwater infiltration

3.3. Preventive Maintenance and Visual Inspection

The site is inspected routinely for conditions with the potential to contaminate storm water. At least quarterly, the maintenance manager inspects all berms, lateral drainage ditches, overflow excavations on the pads, pouroff structures; and performs any maintenance required. A record of all inspections is kept at the facility and will be made available for at least 1 year after closure of the facility or expiration of the storm water permit. Sample inspection forms are included in the Appendix of this document.

3.4. Spill Prevention and Response Procedures

Prevention of spills is stressed during equipment maintenance sessions. Potentially hazardous materials and other chemical substances are not stored on-site. Employees are advised to review an MSDS for the various fuels and lubricants used in the machinery to familiarize themselves with the properties of each substance. Each MSDS provides health and reactivity data that are important in spill response. MSDSs for on site substances will be kept in a location accessible to all plant and emergency response personnel. In the event of a spill, appropriate spill response procedures will be followed.

3.5. Sediment and Erosion Control

The storm water permit requires that areas with a high potential for significant soil erosion be identified and that steps be taken to limit erosion. Features to manage runoff are detailed in the next section.

3.6. Management of Runoff

Storm water runoff from the site is managed through installation of the following features.

Pads (and Staging Areas): Each pad and staging area will have berms perpendicular to slope every 50 vertical feet. The ends of the berms will taper uphill. At the low end of each pad a catchment basin will be constructed sufficient to contain 3,600 cubic feet of water per acre of pad. Each basin will have an outlet to existing drainage grade. The outlets will be lined with country rock derived from the pad construction and readily available country rock from the waste rock piles at the site. See Plates 5 and 6.

Roads: Roads will be bermed on the downhill side by the grading parallel to direction as practical. The uphill side will be ditched parallel to the road direction for drainage as practical. Bedrock or lack of topsoil at the site does not allow this everywhere. For every 50 vertical feet, a berm will direct flow laterally from the road surface and perpendicular to the local gradient. Country rock derived from the road and waste rock piles will be used to line the drainage ditching and berms. See Plates 4, 5, and 6.

In addition, roads, staging areas and pads within 200 feet of a stream bed will have waddles staked on the uphill side of berms to control fine grained materials. .

3.7. Employee Training

The maintenance manager is responsible for preventing storm water pollution and ensuring that this SWPPP is implemented and remains current.

The maintenance manager reports regularly to management and operating personnel on the status of plan compliance and any issues surrounding storm water pollution. Briefings highlight and describe known spill events or failures, malfunctioning components and recently developed precautionary measures. Additional topics may include the following.

- Any environmental/health and safety incidents
- Brief reminders on good housekeeping, spill prevention and response procedures, record keeping and material handling practices
- Announcements of any changes to the plan or new management practices

Pollution prevention training is provided to all new employees. All employees are required to attend at least annually. Topics include the following.

Good Housekeeping

- Basic cleanup procedures
- Proper disposal locations
- Locations of spill cleanup equipment and names of persons responsible for operating the equipment

Material Handling and Storage

- Identification of hazardous materials
- Container labels and MSDS
- Proper container sealing methods

3.8. Recordkeeping and internal reporting procedures

Reports of all inspections required by this SWPPP are retained in the Gulf Coast Mining Group environmental compliance files.

Records of spills, leaks, and other discharges are maintained at the site as required by state and federal regulations.

As required by Section 308(b) of the federal Clean Water Act, this SWPPP and all associated reports and inspections will be made available to any interested member of the public for review.

This plan will be amended whenever any changes occur at the site that may impact the potential for pollutants to be discharged.

3.9. Mining/Reclamation – Specific BMP's

Sediment loading from the mining/reclamation activities is controlled by the following operating procedures.

Slope stabilization and reclamation will occur concurrently with the removal of the waste rock dumps. As the waste rock is removed in approximately 200 by 200 foot sections, large cobbles of country rock will be placed within obvious drainage channels to control erosion.

Additionally, at vertical intervals of 50 feet, small berms comprised of country rock cobbles will be anchored in shallow trenches laterally cut across the hill side to slow and dissipate storm water runoff. On the uphill side of these berms, waddles will be staked across the footing of the berm to control movement of fine-grained materials. Country rock aggregate will be left to armor the slopes between the berms as available.

The intent of this reclamation is to re-establish the pre-mining drainage patterns that existed about a century ago before the introduction of the waste rock piles from the historical mining activities.

3.10. Hazardous Materials – Specific BMP's

Potential surface water and rainwater contamination from hazardous material is controlled by the following operating procedures.

- All fuels and lubricants are to be transported to and from the site in properly labeled and sealed containers.
- All fueling and servicing of machinery is to occur within a designated bermed portion of the Bottom Pad.

3.11. Comprehensive Site Compliance Evaluation

As required by the site's storm water permit, the maintenance manager will conduct a comprehensive site compliance evaluation during January of each year. Such evaluations may be conducted more frequently at the manager's discretion. This annual evaluation provides a basis for evaluating the overall effectiveness of this SWPPP. The inspector will verify that the description of potential pollutant sources contained in the plan is correct, that the site map reflects current conditions and that the controls and measures identified in the plan are in place and working effectively.

The annual comprehensive site compliance evaluation includes, but is not limited to, the following activities.

- Inspect storm outlets from pads for evidence of pollutants entering the drainage system
- Evaluate the effectiveness of measures to prevent pollutant loadings and whether additional measure are needed
- Observe structural measures and sediment controls to ensure proper operation
- Inspect any equipment, such as spill response equipment, needed to implement the SWPPP
- Revise the plan as needed within two weeks of inspection
- Implement any necessary changes in procedure with 12 weeks of the inspection
- Prepare a report summarizing inspection results and follow up actions, the date of inspection and personnel who conducted the inspection
- Identify any incidents of noncompliance or certify that the facility is in compliance with the SWPPP

- The inspection report will be signed by a responsible corporate officer and kept with the SWPPP. The report will be maintained at the facility for three years.

Individuals specifically designated as having responsibility for conducting such inspections must perform this annual inspection. These individuals should be familiar with all facility industrial operations and SWPPP goals and requirements. These individuals must also be able to make necessary management decision or have direct access to management. The individual conducting the inspection will be responsible for follow up and tracking procedures to ensure actions are taken to amend BMPs in response to the inspection findings. A sample annual compliance checklist is included in the Appendix.

4.0 Monitoring and Reporting

The Iron Duke project has a North American Industry Classification System (NAICS) code number of 212210 for iron ore mining and an NAICS code 212312 for broken limestone mining and quarrying. For reporting and monitoring requirements, Gulf Coast Mining Group will conduct all monitoring, inspections and reporting required for this industrial classification.

4.1. Certification in lieu of monitoring

The EPA General Permit allows a discharger to forego storm water monitoring of its outfall(s) if the discharger certifies that "material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products from past industrial activity…that are located in areas of the facility that are within the drainage area of the outfall(s) are not presently exposed to storm water and will not be exposed to storm water for the certification period." This certification must be made on an annual basis, under penalty of law, and signed in accordance with EPA signatory requirements.

At the present time no such certification can be made.

4.2. Applicable monitoring requirements

The General Permit requires quarterly visual monitoring of all outfalls receiving storm water runoff from the facility. Visual inspection reports will include the following information.

- The date and time of examination
- The name of the individual making the examination
- Observations of color
- Observations of clarity
- Observations of floating solids
- Presence of foam or oil sheen
- Any other obvious indications of storm water pollution observed

A sample quarterly checklist is included in the Appendix. The visual monitoring reports will be maintained onsite with this plan.

4.3. Reporting requirements

The results of each inspection will be submitted to EPA Region VI and NMED.

The results must be submitted to EPA Region VI. The submittal should include one Discharge Monitoring Report (DMR) per outfall for each sampling event. In the event of no discharge, "No Discharge" shall be written on the DMR. Submit the monitoring reports to the following address.

MSGP DMR (4203)
U.S. EPA
1200 Pennsylvania Ave, NW.
Washington, DC 20460

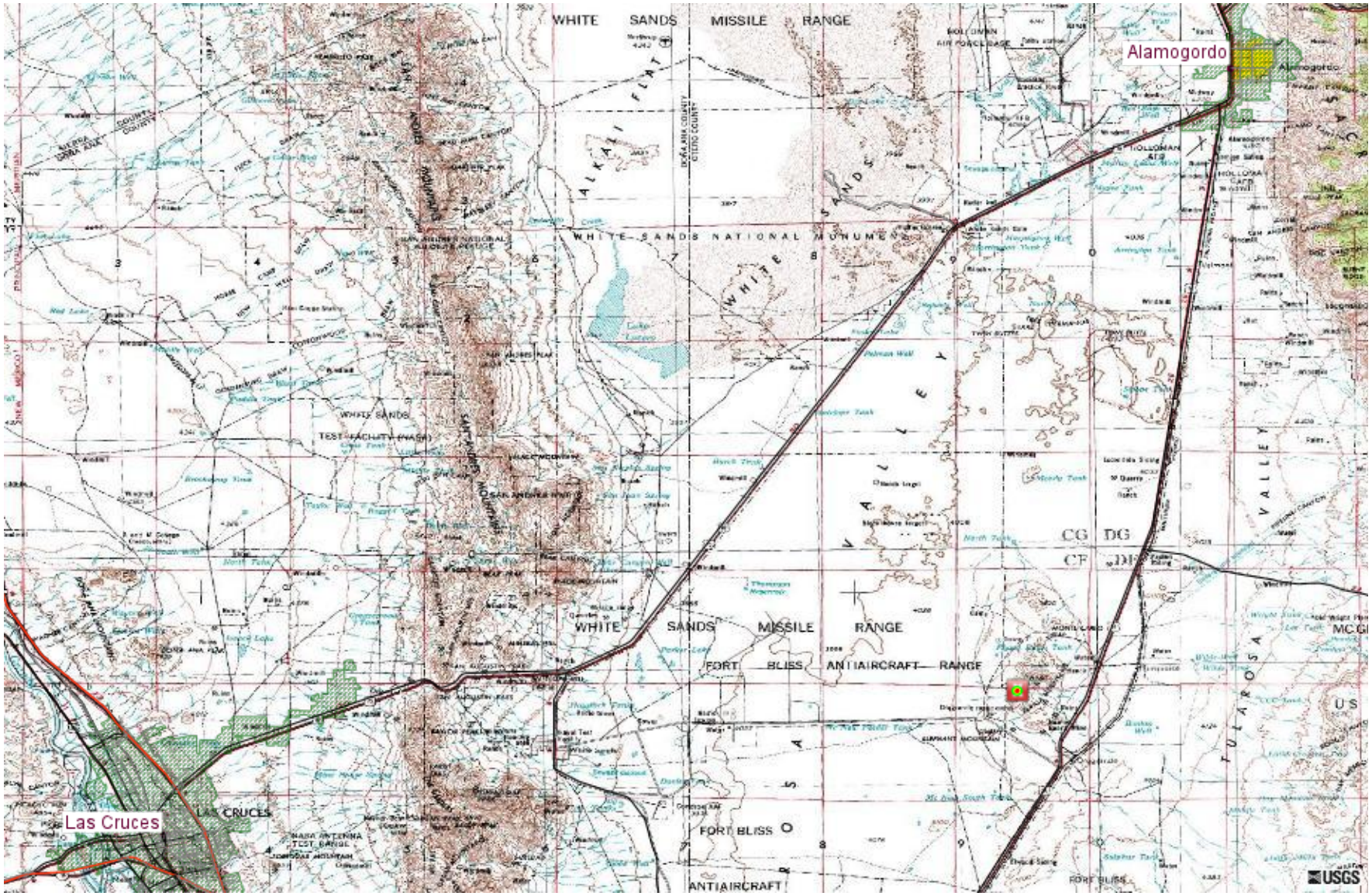
The results must also be submitted to NMED. The submittal should include one discharge monitoring report per outfall for each sampling event and all analytical results. The submittal shall also be sent to the following address.

Program Manager, Point Source Regulation Section
Surface Water Quality Bureau
Surface Water Section
New Mexico Environment Department
1190 St. Francis Drive
Santa Fe, NM 87504-0968

4.4. Accidental Release Reporting

In the event of an accidental release of a hazardous substance of oil in excess of the reporting quantities in Title 40, Part 117 of the Code of Federal Regulations (CFR), a responsible person must contact the National Response Center (800-424-8802) as soon as they have knowledge of the discharge. This plan must be modified within 14 calendar days to reflect the release. The modification should include a description of the amount released and the circumstances that led to the release. In addition, a report must be submitted to EPA Region VI including the date of the spill, the quantity released, the circumstances leading to the release and the steps taken to remedy the situation and prevent a future release.

PLATES



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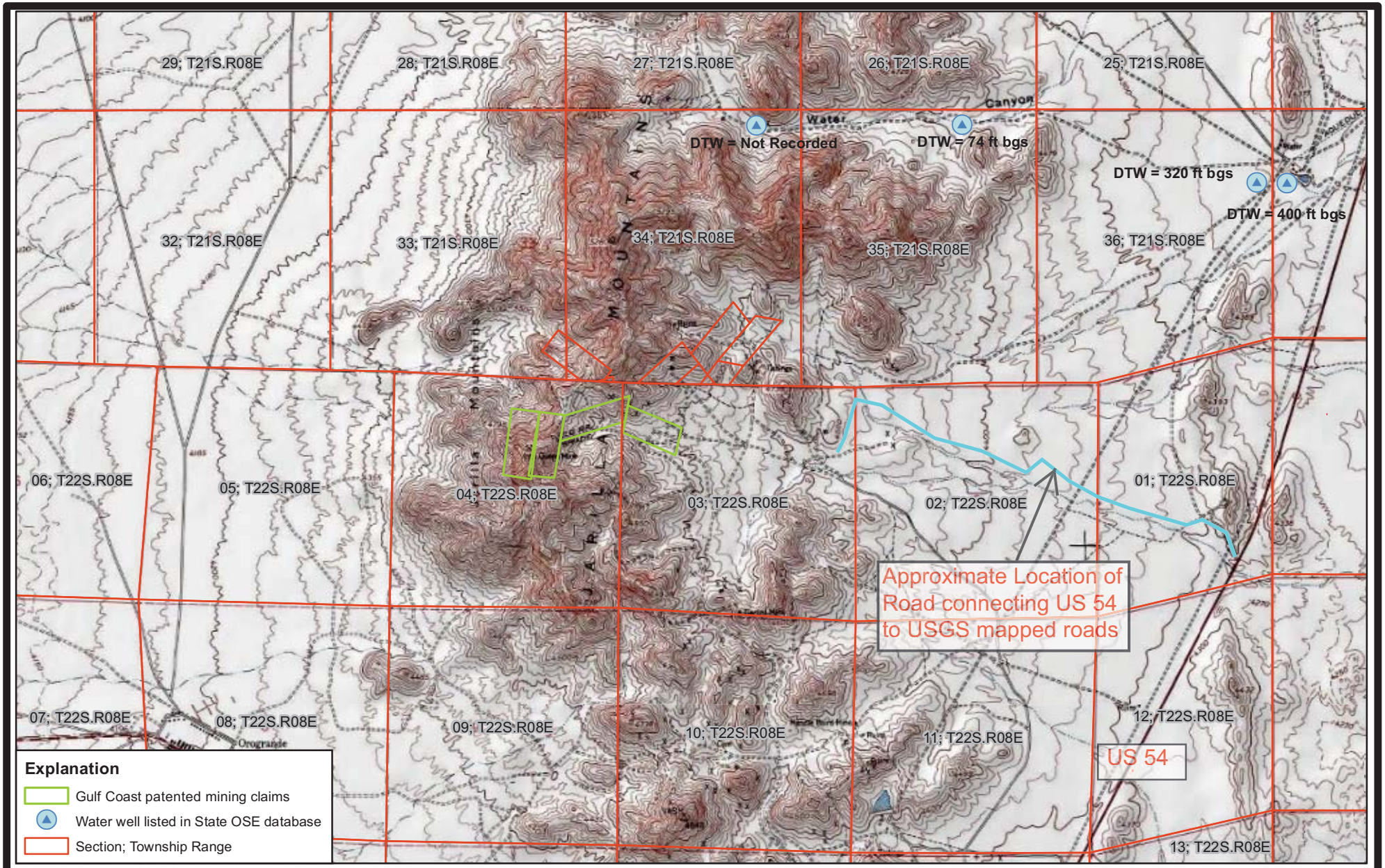
N W E S

R.T. Hicks Consultants, Ltd	Location Map	Plate 1
	Gulf Coast Mining Group LLC	Nov.,2017

Path: S:\Projects\gulfCoast\oroGrande\Plates\plate1.mxd



Base Map: esri.com

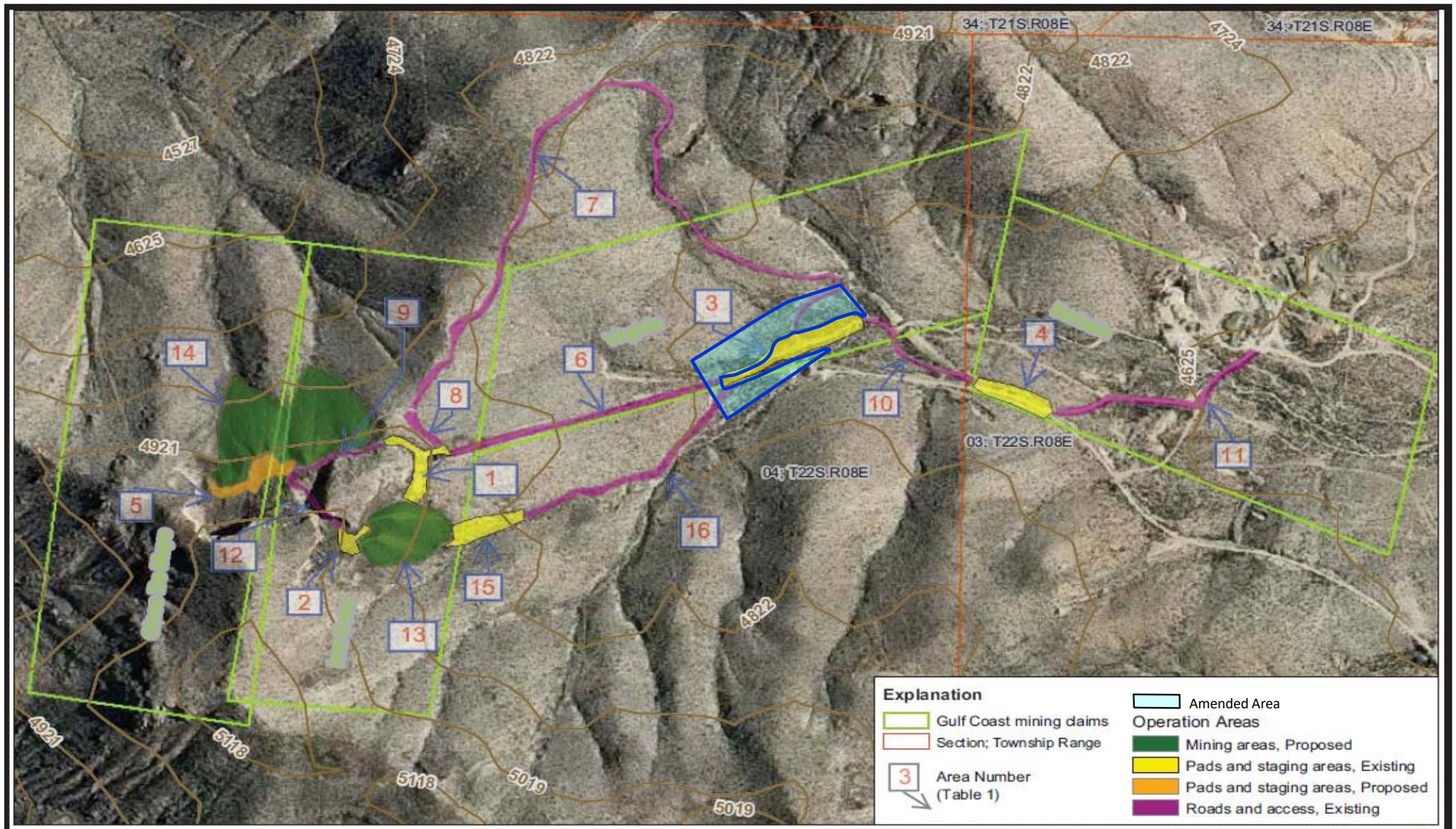
N W E S

0 1,500 3,000 Feet

R.T. Hicks Consultants, Ltd
901 Rio Grande Blvd NW Suite F-142
Albuquerque, NM 87104
Ph: 505.266.5004

USGS Topographic Map With MS Claim Overlay | Plate 2

Gulf Coast Mining Group, LLC
Barbara, Cinco de Mayo, Iron Duke, & Virginia MS Claims | Nov., 2017



Base Map: RGIS, EDAC UNM

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901 Rio Grande Blvd NW Suite F-142
Albuquerque, NM 87104
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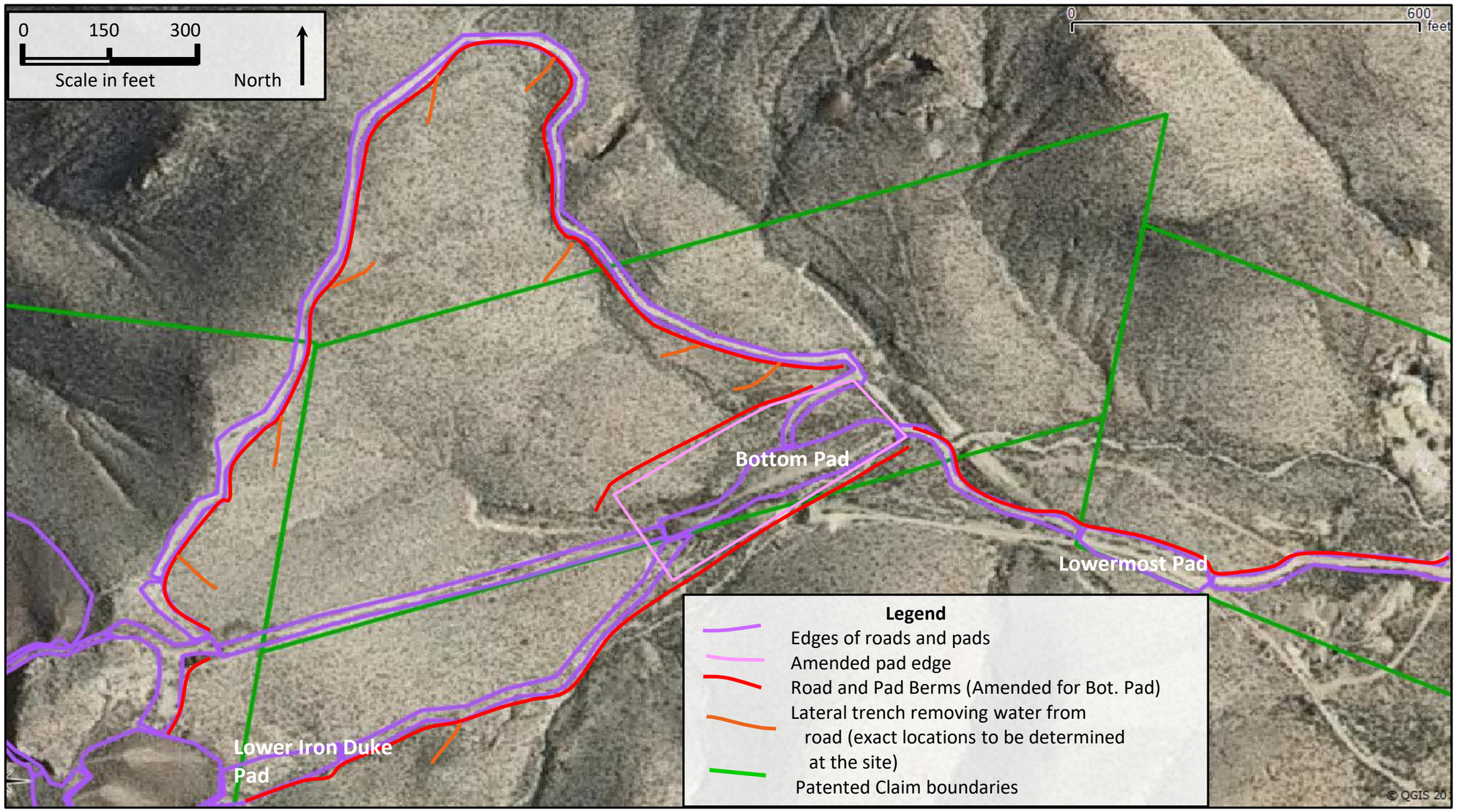
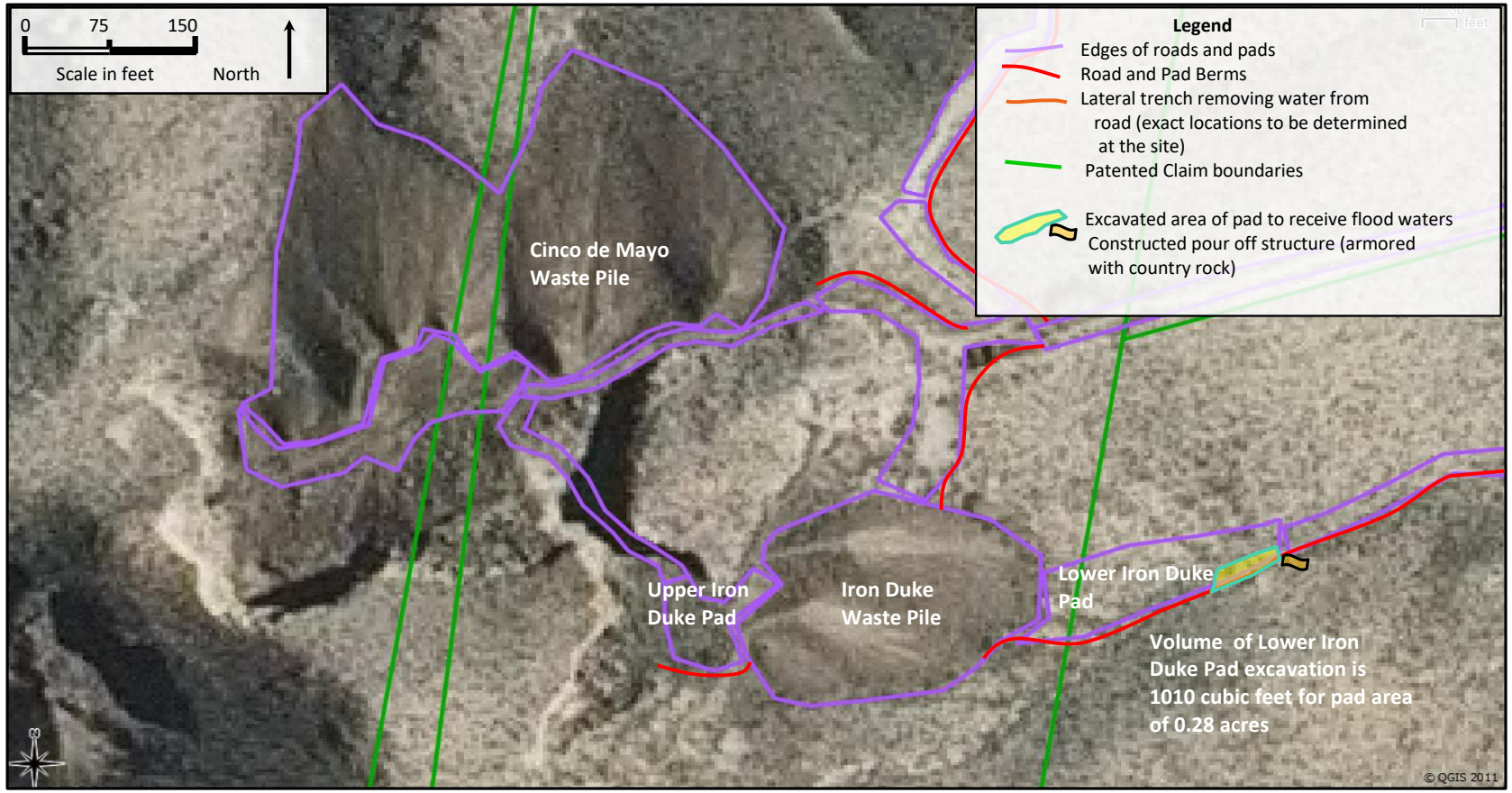
Aerial Photograph with MS Claim Overlay; Existing and Proposed Operation Areas; and Contours	Plate 3a
Gulf Coast Mining Group, LLC Barbara, Cinco de Mayo, Iron Duke, & Virginia MS Claims	Nov.,2017

Area Number	Name of Area	Description	Status	Acres	Amended Additional Area	Area Subtotals
1	Upper Staging Area	Pads and staging areas	Existing	0.26		
2	Upper Iron Duke Pad	Pads and staging areas	Existing	0.20		
3	Bottom Pad (foot of Rail Grade)	Pads and staging areas	Existing	0.56	1.30	
4	Lowermost Pad (on Barbara Patented Claim)	Pads and staging areas	Existing	0.28		**2.60**
5	Cinco de Mayo Access and Upper Pad	Pads and staging areas	Proposed	0.30		**0.30**
6	Cat Path- Old Rail Grade	Roads and access	Existing	0.41		
7	Access Road to Iron Duke and Cinco de Mayo	Roads and access	Existing	1.11		
8	Upper Junction Pad (from head of access road to ID And CdM to Cat Path)	Roads and access	Existing	0.09		
9	Upper Access Road (From Junction Pad to North Side Waste Rock)	Roads and access	Existing	0.08		
10	Pad Connecting Road (connects lowermost pad and bottom pad)	Roads and access	Existing	0.16		
11	Widened Drainage Crossing	Roads and access	Existing	0.40		
12	Iron Duke Access Road (to Upper pad from north)	Roads and access	Existing	0.20		**2.45**
13	Iron Duke Waste Rock	Mining/reclamation areas	Historic	0.90		
14	North Side Waste Rock (Cinco de Mayo and Iron Duke)	Mining/reclamation areas	Historic	2.27		**3.17**
15	Lower Iron Duke Pad	Pads and staging areas	**New**	0.28		
16	Access Road to Lower Iron Duke Waste Rock	Roads and access	**New**	0.38		**0.66**
	Total Area Improved, Reclaimed, Disturbed			**7.88**		**9.18**

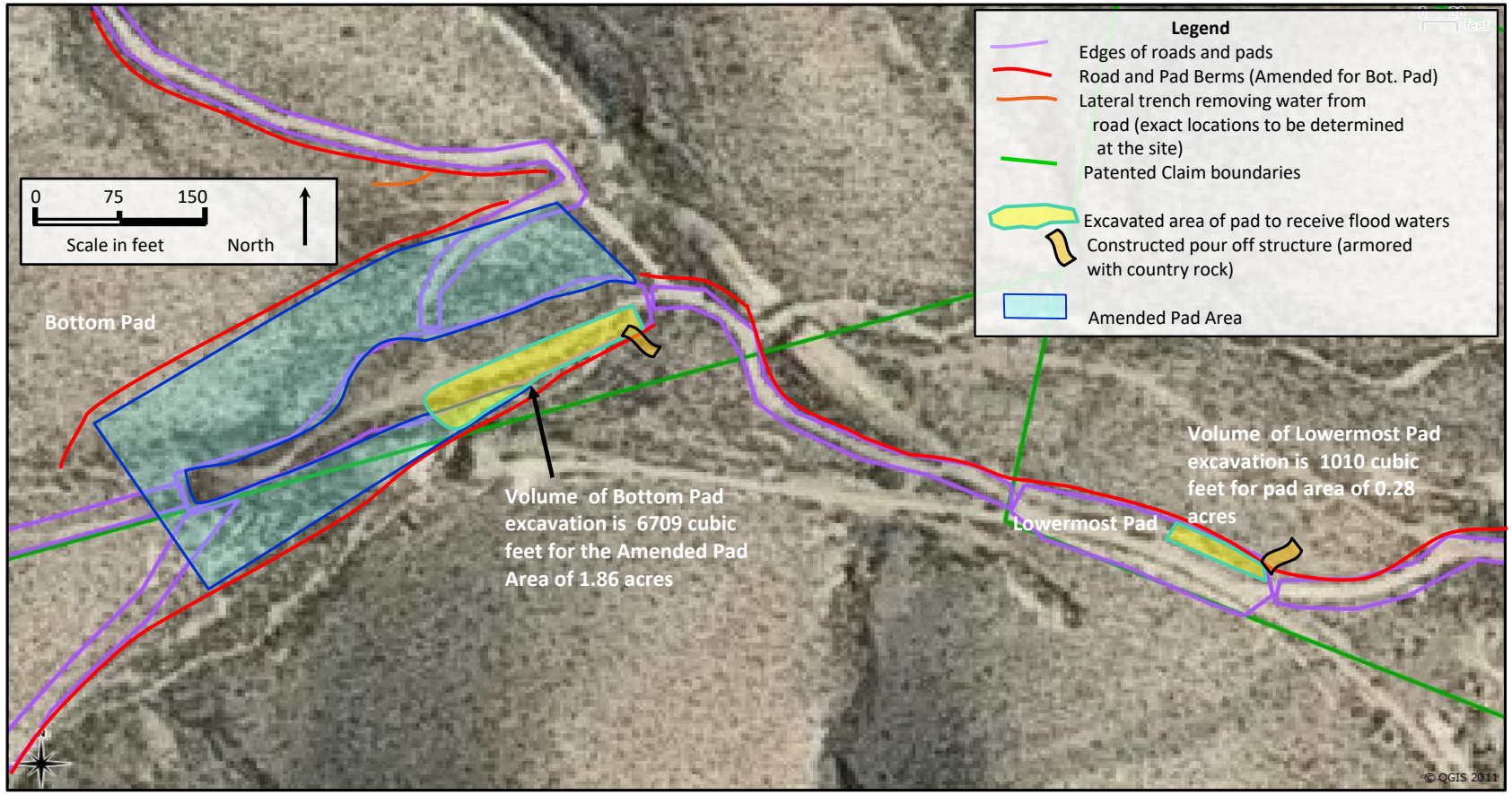
R.T. Hicks Consultants, Ltd **901 Rio Grande Blvd NW, Suite F-142** **Albuquerque, NM 87104** **505-266-5004**	**Identifiers for Plate 3A**	**Plate 3B**
	Gulf Coast Mining Group, LLC. **Barbara, Cinco de Mayo, Iron Duke, & Virginia MS Claims**	**November, 2017**



R.T. Hicks Consultants, Ltd **901 Rio Grande Blvd NW, Suite F-142** **Albuquerque, NM 87104** **505-266-5004**	**Schematic Plan of Berms and Lateral Drains for Roads and Pads, Iron Duke Project**	**Plate 4**
	Gulf Coast Mining Claims, LLC	**November, 2017**



R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW, Suite F-142 Albuquerque, NM 87104 505-266-5004	**Schematic Plan of Berms, Roads, and Pads by the Active Mining/Reclamation Area. Iron Duke Project**	**Plate 5**
	Gulf Coast Mining Claims, LLC	**November, 2017**



R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW, Suite F-142 Albuquerque, NM 87104 505-266-5004	**Schematic Plan of Berms, Flood Water Ponds , and Pour off Structures for the Lower Pads, Iron Duke Project**	**Plate 6**
	Gulf Coast Mining Claims, LLC	**November, 2017**