



New Mexico Energy, Minerals and Natural Resources Department

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Acting Division Director
Mining and Minerals



September 23, 2010

John DeJoia, Manager
Roca Honda Resources, LLC
4001 Office Court Drive, Suite 102
Santa Fe, NM 87507

**RE: Agency Review Comments and Request for Additional Information,
Part 6 New Mine Permit Application, Revised Sampling and Analysis Plan (SAP),
Roca Honda Mine, Permit No. MK025RN – McKinley County, New Mexico**

Mr. DeJoia:

The New Mexico Mining and Minerals Division (MMD) has reviewed the Permit Application Package (PAP), for a Regular New Mine Permit, submitted October 23, 2009, by Roca Honda Resources, LLC (RHR), pursuant to Part 6 of the New Mexico Mining Act Rules (Rules). The PAP was determined Administratively Complete by MMD on November 25, 2009. In addition to the Permit Application, the October 23 PAP submittal also included a revised Sampling and Analysis Plan, Baseline Data Report, Mine Operation Plan and a Reclamation Plan. MMD provides herewith, review comments on the revised SAP, received by MMD from the following reviewing agencies: the NM Office of the State Engineer, the New Mexico Department of Cultural Affairs, the New Mexico Department of Game and Fish, and the Cibola National Forest.

MMD requests that RHR address these comments within a revised BDR submittal to MMD. MMD continues its review of other documents (Mine Operations Plan, Reclamation Plan) included with the PAP submittal and will provide RHR with review comments on those documents separately, in the near future.

Should you have any questions, comments, or require additional information concerning this letter or any enclosures, please contact me at (505) 476-3437, or James Hollen, Permit Lead, at (505) 476-3436 or via email at: james.hollen@state.nm.us.

Sincerely,

James Hollen, Permit Lead MK025RN
New Mexico Mining and Minerals Division



Mr. John DeJoia

**RE: Agency Review Comments and Request for Additional Information,
Part 6 New Mine Permit Application, Revised Sampling and Analysis Plan (SAP), Roca Honda Mine,
Permit No. MK025RN – McKinley County, New Mexico**

September 23, 2010

Page 2 of 2

Enclosures: October 28, 2009, correspondence from NMDCA
 November 10, 2009, correspondence from NMOSE
 November 30, 2009, correspondence from NMDGF
 4 consolidated pieces of correspondence from Cibola National Forest dated:
 December 10, 14, 15, 2009, and January 4, 2010

cc with enclosures: Chuck Thomas, Executive Manager, MMD
 Holland Shepherd, Program Manager, Mining Act Reclamation Program
 Diane Tafoya, Geologist, Cibola National Forest, USDA Forest Service
 Matthew Wunder, Ph.D., Chief, Conservation Services Division, NMDG&F
 Mike Johnson, Chief, Hydrology Bureau, NMOSE
 Michelle Ensey, Archaeologist, NMDCA
 Mine File MK025RN

USFS R3 Review of Roca Honda Uranium Mine Baseline Report, Sampling Plan, and NM MMD comments and RHR Responses; 12.10.2009

Memo

To: Susan S. Millsap, Natural Resource and Planning Staff Officer, Cibola NF

From: Joe Vieira, Air & Water Quality Liaison, US Forest Service - Region 3 -New Mexico
Environment Department - Air Quality Bureau

Date: 12/10/2009

Subject: Review of Roca Honda air quality baseline data, sampling and analysis plan, applicant response to NM MMD comments.

As requested, I have reviewed the following documents relative to the Roca Honda Mine permit application:

1. BASELINE DATA REPORT, Section 2.0, Climatology and Air Quality
OCTOBER 2009 Submitted To: New Mexico Mining and Minerals Division &
U.S. Forest Service (Cibola National Forest) Prepared by: Roca Honda Resources,
LLC 4001 Office Court, Suite 102, Santa Fe, NM 87507
2. SAMPLING AND ANALYSIS PLAN, Section 2.0, Meteorology and Air
Quality, OCTOBER 2009, Submitted To: New Mexico Mining and Minerals
Division & U.S. Forest Service (Cibola National Forest) Prepared by: Roca
Honda Resources, LLC 4001 Office Court, Suite 102, Santa Fe, NM 87507
3. Response to NM MMD Comments to SAP, July 15, 2009 Roca Honda Resources
LLC Permit No. MK025RN, October 16, 2009

In my review I noted that New Mexico Environment Department – Air Quality Bureau comments and/or applicant responses were not included so I informally consulted with AQB staff on questions that I had as they related to the applicant’s baseline data report, proposed sampling and analysis plan, and responses to state comments.

My comments here concern regulatory authority, baseline data presentation, and sampling objectives.

Regulatory authority

The National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 61, subparts (61.61.01 to 61.359) apply under this application. Specifically:

- **B**, National Emission Standards for Radon Emissions from Underground Uranium Mines

- T, National Emission Standards for Radon Emissions from the Disposal of Uranium Mill Tailings;
- W, National Emission Standards for Radon Emissions from Operating Mill Tailings.

In reference to the Roca Honda uranium mining there would be 2 main pollutants of concern. The first is particulate matter. In New Mexico there are 3 regulated PM air pollutants; 2 federal criteria pollutants, PM10 and PM2.5; and 1 state regulated pollutant, Total Suspended Pollutants (TSP). National Ambient Air Quality Standards (NAAQS) apply with reference to the federal criteria pollutants. The applicant is correct that the McKinley County is in attainment of PM. The second main air pollutant would be radionuclides, which is an EPA Hazardous Air Pollutant.

According to the Roca Honda Plan of Operations, the mining would take place underground. There would be only construction activity and stock piles on the surface. Presently, the New Mexico Air Quality Bureau does not regulate particulate matter emissions from construction activities or stock piles. Nor does the AQB regulate radionuclide air pollution. EPA Region 6 has that authority. EPA Region 6 may or may not require air permitting for the underground uranium mining activities. Further consultation by the applicant would be required.

In addition to permitting requirements that Region 6 may have, there are 2 air related federal regulations that may apply to this project. These federal regulations would apply regardless if an air permit is required by EPA Region 6. The 3 regulations are 40 CFR 61, Subparts B, T, and W (see link above). It appears that the NM MMD state regulations require this baseline air monitoring.

Baseline data report

Overall, the applicant's revised description of regional climate, site air quality, and climatological factors representative of the permitting area respond directly to the state's July 2009 comments and are satisfactory. The applicant has reasonably addressed state agency questions brought forward regarding meteorological data, precipitation, pan evaporation, air quality. The exception would be graphic description of prevailing winds (Figure 2-2). The applicants own narrative states that:

Local wind conditions at the Roca Honda permit area are affected by topographic features that modify general synoptic wind patterns.

NMED Air Quality Bureau commonly monitors prevailing winds and reports wind rose data at least on a monthly basis to describe the range of variability in wind direction and speed. Given the complexity of the terrain in the permit area, the risk of PM drift from mine portals, vents, and the states defined concerns about weather station sufficiency, the baseline prevailing wind reporting should be presented more than an annual average. Individual wind roses for the 12 months of the year would be more descriptive of conditions at the site.

Sampling

In terms of content of the sampling and analysis plan and applicant responses to the state's July 2009 comments, Roca Honda has reasonably addressed such issues as sampling objectives, data needs, air quality, methods of collection, air quality monitoring, air particle pump, radon

detectors. There is some minor disagreement between the applicant and the state on where to document radiation data and collection methodology (Doc.3 Item 2. P.4). The applicant's discussion and response to NMED SWQB categorizing radon and gamma data gathering as an ambient air quality characterization appear reasonable.

NM MMD also questions the adequacy of location of meteorological monitoring stations to characterize site-level wind patterns. The fundamental concern is terrain complexity in the mining area and variable effects on dust collection, transport, and accumulation. NMED AQB staff specialists familiar with sampling protocols and uranium mining also expressed surprise that only one monitoring station was in place. The applicant's response (Doc.3 Item 9 p.17) discounts the state's concern and fails to address micro-climatic variability and potential mine dust impact on biological components that could occur in the small canyons, differing slopes, or open mesa.

The direction of any potential drift and fate of PM from the uranium mine site, roads, or vents is a USFS concern as well. Understanding how any dust moves relative to the mine site, where it deposits, how much deposits, form the basis of understanding environmental impact on Forest Service and surrounding land. This would facilitate more meaningful mitigation. At this scale, any terrain complexity should be taken more seriously in the sampling and analysis plan. While this reviewer presumes stringent mitigation to prevent any such PM drift would be placed on this land use, were it to be permitted, I agree with NM MMD and NMED AQB caution and comments.

A representative network of 'mini'- stations, as requested by NM MMD, installed on high ridges, north and south facing valleys, coves, open plateaus, along haul roads, at least in the short-term is good science for the purpose of protecting people and the environment. This state request for a data collection should be well considered, given the nature of the mineral to be mined. Further consultation with EPA Region 6 on this permit, the comments here, NESHAP adherence, and these monitoring questions is also recommended.

Response to "Request for Review and Comment on the Revised Sample and Analysis Plan for the Roca Honda Mine, Roca Honda Resources, LLC in support of Permit No. MK025RN"

From: Livia Crowley, hydrologist, Cibola Nat'l Forest, December 14, 2009

I have reviewed Topsoil (Section 6), Surface Water (Section 8), Ground Water (Section 9), and Radiological Baseline (Section 10) of the "Revised Sample and Analysis Plan for the Roca Honda Mine, Roca Honda Resources, LLC in support of Permit No. MK025RN"

General Comments:

1. It is understood that the intent of this document is to respond to the State of NM permit process. Because of this, some elements that would be needed for Forest Service purposes are not included in these documents. This includes, but is not limited to:

- a. Watershed condition/values
 - b. Characterization of watercourses using morphological/physical parameters
 - c. Cumulative effects
2. Sampling regimes/protocols are somewhat general and not specified so as to enable evaluation of whether or not such sampling will be adequate.

Section 6 - Topsoil Comments

1. Agree with state comments about not relying on composite samples. Individual sample analysis is better for characterization of site.

Section 8 - Water Quality

1. References used in the response to comment 5. From MMD, on page 40 in regards to sample, location number of samples, field protocols being determined using protocols and techniques used by the USGS for the NWQAP (National Water Quality Assessment Program) may not be completely suitable for this purpose since sampling includes radiologic parameters which may require other considerations and protocols.
2. Characterization of stream reaches by only perennial, intermittent, and ephemeral does not capture the full diversity of these stream systems. Morphological parameters should be considered such as Rosgen stream classification methods. This would provide information on how the stream reach would adjust to proposed change to perennial flows.
3. Sediments should be analyzed in regards to size so that information is available on the distribution of parameters by size class. This is important since streams transport and sort sediments by size. The finest particles are transported the farthest and most easily. Larger sediment collects in bends and on bars.
4. Drainage profiles should include cross sections at representative reaches as determined by an appropriate stream typing classification system such as Rosgen's method. Not just engineering methods. (section 8.5.1.8)
5. Spring data should include basic characteristics of springs including type of spring, morphology, and discharge in addition to water quality data.
6. Sampling of runoff water should also be completed in the ephemeral watercourse draining the project area.

Section 9 - Ground Water

1. Please discuss the relevance of the Fernandez Monocline which crosses the project area.
2. Groundwater sampling and site monitoring should include the vadose zone perhaps through the use of lysimeters.
3. Water level monitoring should be done more continuously than quarterly. Water level data collectors are not expensive or hard to use. Sample frequency should utilize the water level data to capture the variability to see if there is a relationship.
4. Figure 9-7 is not of sufficient detail to see where proposed sample locations are located.

Section 10 - Radiological Survey

1. What constitutes a steep slope? Map (figure 10-1) is not of sufficient detail.
 2. Soils samples will be taken from typical areas. What are 'typical' areas? Please define.
 3. How is this date used to determined the background? From the highest samples? The lowest? Is there a range?
-

Comments from Ian R. Fox,

Timber Management Officer, Cibola National Forest, December 15, 2009 Phone (505)346-3814, Cell (505)401-5245, Fax (505)346-3901

I have reviewed the material for Roca Honda, primarily the State's comments. I concur with all of the statements. I would like to add on page 25 of the State's comments Items # 6 and 8 that:

"There should be at least one enclosure site identified as the reference area for vegetation, not just wildlife. This area should be identified in cooperation by Forest Service Specialist and Strathmore and approved by the Forest Service. The area should be the best site that represents desired condition for reclamation of the site"

Holland,

RE: State comments on the Roca Honda SAP:

I have one comment lagging behind the others I sent you. From wildlife person on the Mount Taylor District; along with the table listing species of concern, notation should be made of "Forest Service Sensitive Species". Roca Honda's contractor has a listing of these FS sensitive species. If not I can provide a FS wildlife contact.

If it is possible, please send this along. Otherwise, we will address this as it comes around again. On other business, the MOU for the State Agencies and FS regarding Roca Honda should get moving now that the holidays are over.

Stay tuned &
Thank you,

Diane

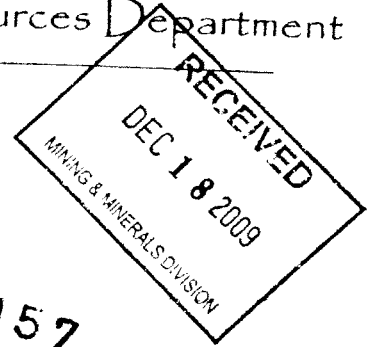
Diane Nowlin Tafoya
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New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
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Division Director
Mining and Minerals



October 28, 2009

88057

Michelle Ensey
Archaeologist
Dept. Cultural Affairs
407 Galisteo Street, Suite 236
Santa Fe, NM 87501

MME

RE: Request for Review and Comment on the Revised Sample and Analysis Plan for the Roca Honda Mine, Roca Honda Resources, LLC in support of Permit No. MK025RN

Dear Ms. Ensey:

The New Mexico Mining and Minerals Division (MMD) has received the Revised Sample and Analysis Plan (SAP) from Roca Honda Resources, LLC, in support of the Roca Honda Mine located in McKinley County, NM. This request asks that your agency review the enclosed, revised SAP, dated October 2009, and the enclosed Response to NM MMD Comments to SAP document, dated October 16, 2009, relative to your initial comments. Your agency's initial comments are addressed in the Response to NM MMD Comments to SAP. Please provide any comments you may have within 30 days of the receipt of this letter.

If you would like a CD copy of the SAP, please let us know. An electronic copy can also be obtained by going to the New Mexico MMD Website given below, and then clicking on Pending Mine Applications, Regular New:

<http://www.emnrd.state.nm.us/MMD/MARP/MARPNewPermitApplicationsandCloseoutPlans.htm>

Sincerely,

Holland Shepherd
Program Manager
Mining and Minerals Division

No COMMENTS
Michelle Ensey
for NM State Historic Preservation Officer

12/17/09

Enclosures: SAP and Response to NM MMD Comments to SAP

cc: Chuck Thomas, Executive Manager, Mine Reclamation Bureau
File No. MK025RN



From: Myers, Kevin, OSE
Sent: Tuesday, November 10, 2009 10:30 AM
To: Shepherd, Holland, EMNRD
Cc: Rappuhn, Doug H., OSE; Johnson, Mike S., OSE
Subject: NM OSE Comments on Revised SAP and Response to Comments for Roca Honda Mine Project - RHR - MMD Permit No. MK025RN

Holland,

NM OSE Hydrology Bureau received a request for review and comment on the Revised Sampling and Analysis Plan for the Roca Honda Mine (SAP). MMD's request letter is dated October 28, 2009 and was received on October 30, 2009.

NM OSE Hydrology Bureau has reviewed the responses and portions of the SAP. The SAP is adequate for completion of the baseline data report. NM OSE Hydrology reserves further comments and review for the baseline data report. Apart from the two clarifications below, NM OSE Hydrology Bureau has no further comments. The clarifications should be addressed in the baseline data report.

1. Page 51 of the response to comments, No. 5. The RHR response appears to illustrate some confusion about the mentioned U S DOE background wells. As a clarification, these wells are located south of San Mateo Creek and near the confluence with Arroyo del Puerto. RHR mentions that the wells are somehow close to the Homestake Mill, which is not the case. Please see Figure 2.1 in the May 31, 2001 report entitled Application for Alternate Concentration Limits in the Alluvial Materials at the Quivira Mill Facility Ambrosia Lake, New Mexico with US NRC document number ML011690068.

http://adamswebsearch2.nrc.gov/idmws/doccontent.dll?library=PU_ADAMS^PBNTAD01&ID=060200209

2. Page 54 of the response to comments, No. 14. The RHR response indicates that Figure 9.6 (actually Figure 9-2, Potentiometric Surface of Westwater Canyon Member) has been revised to incorporate recent water level data, yet the water levels used are from 1955 to 1978, when there exists water level data for measurements made over the last 20 years. As presented in Section 9, it is unclear if any figure shows a representation of a potentiometric surface from recent water level measurements in the Westwater Canyon member.

If you or the applicant have any questions concerning the above comments, contact me by phone or email.

KCM

Kevin Myers, Hydrologist
Hydrology Bureau - NM OSE
P.O. Box 25102
Santa Fe, NM 87504-5102
Ph: (505) 827-3521
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Hobbs, NM

November 30, 2009

Holland Shepherd, Program Manager
EMNRD Mining & Minerals Division
1220 South St. Francis Drive
Santa Fe NM 87505

Re: Roca Honda Mine Revised Sampling and Analysis Plan, Permit No.MK015RN; NMGF Project No.13065

Dear Mr. Shepherd:

In response to your letter dated October 28, 2009, the New Mexico Department of Game & Fish (NMGF) has reviewed the above referenced document, as well as the Response to Agency Comments by Strathmore Minerals Corp. dated October 16, 2009. The Sampling and Analysis Plan (SAP) is required to be submitted to the Director of MMD prior to baseline data collection under the New Mining Operations section of the NM Mining Act Rules (19.10.6.602 D(12)). In our letter to MMD dated May 13, 2009 (NMGF Project No.12658), we commented on Section 4, Vegetation, and Section 5, Wildlife, of the Roca Honda SAP. Strathmore's responses to those comments are addressed below (original NMGF comments italicized).

Section 4 Vegetation

Introduction and Background. NMGF is in possession of the Wood, et al, 2006 report of their special status plant species survey of Section 16. We do not have a copy of the report of the Section 9 and 10 survey conducted that same year. Please provide a copy of that report.

Strathmore's response that the information will be included with the Baseline Data Report accompanying their Mining Act permit application is acceptable.

Figure 4.3 Transect Line Locations in the Reference Area. Please show vegetation types on the reference area map, corresponding to those delineated for the project area. Please identify the number of transects in each vegetation type at each location (project area and reference). Please add productivity exclosures in the reference area, or explain why none are there located there.

The revised SAP states that a minimum 15 transects per vegetation type will be utilized. This should be an adequate number of transects, however Strathmore should provide an analysis of statistical sufficiency.

The response to comments also clarifies that the reference areas are meant to serve as control for the wildlife studies, and not for the vegetation data collection. There is no requirement in the Mining Act Rules to identify a vegetation reference area in the SAP, however a reference area is typically an element of the reclamation plan portion of a mine permit application (19.10.6.603), and logic suggests that similar data should be collected simultaneously in order to demonstrate

suitability of the selected location for that purpose. We request that MMD clarify the procedure and timing for establishment of a vegetation reference area for measuring success of Roca Honda Mine revegetation efforts at closeout.

4.4.2.2 Data Collection and Analysis of Cover. *Please explain how overlapping hits on the line intercept transects will be recorded and interpreted. Please record diameter at ground level in addition to height for juniper and pinyon trees. The project area supports a large number of apparently very old trees, and for these species diameter is a better index than height to approximate age of the tree. Please collect cores from a subset of measured trees and perform a site-specific correlation of diameter with age, for the purpose of documenting the extent of mature woodland as opposed to recent brush encroachment, and in view of the importance of large diameter pinyon and juniper for bat roost needs, particularly summer maternity roosts.*

The response to this comment is confusing. The response states that each species will be recorded where multiple species overlap, but does not demonstrate a method of calculating cover that precludes double-counting of cover layers. It also states that basal cover (bare ground, litter, etc) will be recorded at each point. However a laser monitoring device will apparently be employed, and we are not familiar with a laser device that counts more than one layer (the uppermost). NMGF requests that Strathmore provide more detail describing their point intercept methodology.

Regarding characterization of the age structure of the woodlands on the Roca Honda site, the response states that representative measurements will be taken of tree height, diameter at breast height (dbh), and number of stems. Observations will also be taken of the dimensions seen from aerial photos. Dbh is suitable for ponderosa pine, but the standard methods for aging or describing stand structure in pinyon-juniper are basal diameter (usually measured at "stump height", one foot above the ground), canopy projection (such as seen on aerial photography), and/or height, as correlated with age determined from representative core samples. Please provide a reference for the validity of measuring number of stems as a metric of community structure.

4.8 Laboratory and Field Quality Assurance Plan. *The personnel section of the QAP has been cut and pasted from the Wildlife section. Please replace wildlife biologist qualifications with qualifications specific to botany personnel.*

The change has been made as requested.

Section 5 Wildlife

Permits. *NMGF recommends that the project consultants obtain scientific and educational take permits from the state. While permits are not strictly required for this type of activity, if a state Threatened or Endangered species should be inadvertently destroyed during the survey work, it would be a violation of state law in the absence of a permit. Permit application forms can be found at <http://www.wildlife.state.nm.us/conservation/documents/wildlifeforscientificeducation.pdf>.*

The Response to Agency Comments states that scientific collection permits will be obtained, but we cannot find where the SAP has been revised to reflect this.

Introduction and Background. *NMGF is in possession of the Wood, et al, 2006 report of their special status wildlife species survey of Section 16. We do not have a copy of the report of the Section 9 and 10 survey conducted that same year. Please provide a copy of that report. Only those species with federal status were included in the 2006 report. There are a number of state listed and sensitive species for which are not included in the survey, notably the state Threatened gray vireo and spotted bat, for which habitat may be present on the project area. We enclose a list of special status species known to occur in McKinley and/or Cibola County. Please conduct targeted surveys for state species without federal status, especially the gray vireo and spotted bat.*

Strathmore contends that spotted bat was not a special status species at the time of their survey. Spotted bat has been on the NM Threatened list since 1988 and would have been included on any list of special status species obtained from NMGF. They also contend that gray vireo was included in their survey. Gray vireo is not included in the report which is in our

possession. Possibly there may have been an additional special status species survey of which we are not aware; hopefully this situation will become clear when the full set of reports is provided along with the Baseline Data Report. The SAP has been revised to include targeted protocol surveys for state special status species.

Figure 5-1 Wildlife Habitat Types. Please depict the "potential wetland riparian areas within and below the permit area", referred to on Table 5-1, and briefly describe these areas in the text. Please also depict the "intermittent/topographic" habitat types (rock/ cliffside and arroyo/ drainages) as referred to in 5.4.2.2 Sampling Design, and describe their extent and nature in the text.

Strathmore's response that the information will be included with the Baseline Data Report accompanying their Mining Act permit application is acceptable. Note that these might be considered "special or unique wildlife habitat features" as described in 19.10.6.D(13)(d)(i).

5.4.1 Wildlife Species Inventory. The surveys conducted in 2006 on Section 16 do not provide full baseline data regarding comprehensive lists of species and habitat types and associations. Surveys were conducted only in the fall and winter, and habitat associations are reported only for species with federal special status. Please complete similar transect surveys in the spring and summer seasons, and report habitat associations for all species observed. As noted above, we are not in possession of survey reports from Sections 9 and 10.

Strathmore's response that the information will be included with the Baseline Data Report accompanying their Mining Act permit application is acceptable.

5.4.2.3 Field Methodology. Please provide detailed survey protocols for all species groups listed. Use federal or state standard protocols for special status species where available (NMGF can provide specific protocols for burrowing owl, raptors and gray vireo).

Please describe and identify the location of standing water where bat netting will take place, and any other wildlife-available waters on or near the permit area. Due to the potential presence of a number of sensitive and one Threatened bat species, the apparent presence of good roosting habitat (older junipers with dead branches and loose bark and deeply creviced vertical rock faces) and the limited availability of appropriate netting locations, NMGF recommends that netting surveys be supplemented with acoustic inventory techniques.

Figure 5-2 Wildlife Survey and Transect Locations. Please add survey stations for medium-large mammals and herpetofauna/ small mammals in Section 10, or explain why no survey stations are located there.

Strathmore responds that survey protocols and sampling locations will be provided in the Baseline Data Report. We believe the intent of requiring "methods of [data] collection" as part of an SAP (19.10.6.D(12)(a)(iii)), was to allow agency confirmation that the methods would be sufficient to meet the reporting requirements of 19.10.6.E (d) regarding the Baseline Data Report. In the absence of detailed information regarding methodology, NMGF is unable to make that determination.

In addition to bat acoustic surveys, we also recommend that a survey for raptor nests in suitable habitat within one mile of any proposed mine facilities should be added to the SAP.

Thank you for the opportunity for continued consultation on this permitting document. If there are any questions, please contact Rachel Jankowitz at 505-476-8159, or rjankowitz@state.nm.us.

Sincerely,

Matthew Wunder, Chief
Conservation Services Division

cc: Ecological Services Field Supervisor, USFWS
Brian Gleadle, NW Area Office Supervisor, NMGF
Kurt Vollbrecht, NMED Groundwater Quality Bureau