## State of New Mexico Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham Governor

Sarah Cottrell Propst Cabinet Secretary

Todd Leahy, JD, PhD Deputy Cabinet Secretary Mike Tompson, Interim Director Mining and Minerals Division



September 18, 2019

Mr. Roy Blickwedel General Electric 503 Springbrook Lane Wayne, PA 19087

RE: General Comments on Closeout Plan, United Nuclear Corporation, St. Anthony Mine, Cibola County, New Mexico, Permit Tracking No. MK006RE

Dear Mr. Blickwedel,

The Mining and Minerals Division ("MMD") has received and reviewed the *St. Anthony Mine Closeout Plan* ("Closeout Plan") dated March 29, 2019. A site visit was conducted in support of the Closeout Plan on May 30, 2019, and a telephone conference call was held between MMD, the New Mexico Environment Department ("NMED"), GE/UNC, Intera, and Stantec Consulting Services, Inc. on July 10, 2019.

Additionally, MMD solicited comments from cooperating agencies on the Closeout Plan pursuant to 19.10.55.506.E NMAC. Comments from NMED and the New Mexico Office of the State Engineer are enclosed with this letter. Recent correspondence from NMED dated August 16, 2019, on the Closeout Plan is also included with this letter.

MMD has the following general comments on the Closeout Plan:

- 1. During the Multiple Accounts Analysis ("MAA") process, the highest ranked alternatives were Alternatives F1 and F2 (Pit Closure III). These alternatives described the amount of pit backfill "to a level above the projected post-backfill groundwater elevation and contoured to ensure free drainage away from the pit." The Closeout Plan submitted does not meet this requirement for Pit 1. This was discussed with the parties present during the telephone conference on July 10, 2019.
- 2. Highwall reclamation within Pit 1 is not adequately addressed to re-establish a self-sustaining ecosystem. Drainage control at the top of the Pit 1 highwall is also not adequately addressed, specifically in the location of the proposed Pit 1 diversion berm on the west highwall which diverts water toward an existing erosion feature on the highwall. As discussed with Seboyeta Land Grant board members, the desire of the board is to have the highwalls regraded so that a perimeter cattle fence (which would require long-term maintenance) and warning signs are not needed.
- Based on items 1 and 2 above, a redesign of the reclamation of Pit 1 is required before
  additional technical comments can be provided on the Closeout Plan. As discussed in the
  telephone conference on July 10, 2019, it is MMD's understanding that efforts to revise the

RE: General comments on Closeout Plan, St. Anthony Mine, McKinley County

September 18, 2019

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Closeout Plan and provide alternative engineering designs are being considered by GE/UNC.

4. MMD requires GE/UNC to submit a permit revision fee in the amount of \$6,000 in order to process the next iteration of the Closeout Plan in accordance with the fee structure outlined in 19.10.201.K NMAC. In addition, upon submittal of an administratively complete revised Closeout Plan, GE/UNC is required to complete the public notice procedures outlined in 19.10.9.902 and 19.10.9.903 NMAC.

MMD recommends that the cooperating parties reconvene to discuss any preliminary design alternatives being considered by GE/UNC prior to submittal of a revised Closeout Plan.

If you have any questions, please contact me at (505) 476-3434 or by email at david.ennis@state.nm.us.

Sincerely,

David J. (DJ) Ennis, P.G.

Permit Lead

Enclosures: NMED Memo dated July 17, 2019

NMED Letter dated August 16, 2019

NMOSE Correspondence dated June 6, 2019

cc: Holland Shepherd, Program Manager

Amber Rheubottom, NMED

Mine File (MK006RE)



Howie C. Morales
Lieutenant Governor

# NEW MEXICO ENVIRONMENT DEPARTMENT

**Ground Water Quality Bureau** 

1190 Saint Francis Drive / PO Box 5469 Santa Fe, NM 87502-5469 Phone (505) 827-2900 Fax (505) 827-2965 www.env.nm.gov



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

#### **MEMORANDUM**

Date:

July 17, 2019

To:

Holland Shepherd, Program Manager, Mining Act Reclamation Program

Through: Jeff Lewellin, Mining Act Team Leader, Mining Environmental Compliance Section

From:

Amber Rheubottom, Mining Environmental Compliance Section

Alan Klatt, Surface Water Quality Bureau

Rhett Zyla, Air Quality Bureau

Subject: NMED Comments, 2019 Updated Closeout Plan, St. Anthony Mine,

McKinley County, New Mexico Mining Act Permit No. MK006RE

The New Mexico Environment Department (NMED) received correspondence from the Mining and Minerals Division (MMD) on April 8, 2019 requesting NMED review and provide comments on the above-referenced MMD permitting action. In accordance with 19.10.5.506 NMAC, NMED reviewed the updated Closeout Plan (CP) after receiving extensions from MMD to perform a site inspection and meet with personnel associated with the Cebolleta Land Grant. NMED has the following comments.

## **Background**

The St Anthony Mine is a former uranium mine, located 10 miles north of the town of Laguna, on land leased from the Cebolleta Land Grant. It was operated from 1975-1981 by United Nuclear Corporation, now a subsidiary of General Electric (GE). Mining was through underground and surface methods. The site is composed of two open pits and multiple overburden and low-grade waste piles with an areal extent of approximately 2,500 acres. The site is regulated by MMD under permit MK006RE and by NMED's Ground Water Quality Bureau through an Abatement Plan.

## Surface Water Quality Bureau

The Surface Water Quality Bureau comments are attached under separate letterhead.

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### **Air Quality Bureau**

The Air Quality Bureau comments are attached under separate letterhead.

## Mining Environmental Compliance Section (MECS)

MECS notified UNC of the requirement to submit an Abatement Plan in 2002. Since then, numerous reports have been submitted leading to approval of a Stage 1 and Stage 2 Abatement plan, and the granting of Alternative Abatement Standards (AAS) by the Water Quality Control Commission (WQCC) for groundwater in the Jackpile Sandstone at the site. The WQCC Findings of Fact, Conclusions of Law, and Final Order, dated September 29, 2017, included statements related to the final closure of the site. MECS staff have reviewed the CP and have the following general comments:

- GE is required to provide a long-term monitoring plan to NMED under the Stage 2
   Abatement Plan which includes groundwater monitoring. There is no mention of monitoring wells in the CP.
- 2) It is not clear how groundwater monitoring will be achieved if all roads are reclaimed.
- During geotechnical drilling at the site, gas was detected (reported as methane and hydrogen sulfide) in multiple waste rock and overburden stockpiles. Further investigation, characterization, and determination of the source or sources of the gas is necessary for the appropriate safe handling and placement of material during implementation of the CP.

MECS has additional comments on the CP that are more directly related to the Abatement Plan which will be provided directly to GE with copy to MMD.

## **NMED Summary Comment**

NMED will continue to cooperate with MMD and GE during closure and reclamation of the St. Anthony Mine. NMED is withholding the environmental determination associated with the updated CP until such time as all comments are addressed.

If you have any questions, please contact Jeff Lewellin at (505) 827-1049.

cc: Rebecca Roose, Director, Water Protection Division Elizabeth Bisbey-Kuehn, Bureau Chief, AQB Shelly Lemon, Bureau Chief, SWQB Fernando Martinez, Division Director, EMNRD-MMD DJ Ennis, Lead Staff, EMNRD-MMD Kurt Vollbrecht, Program Manager, MECS



Howie C. Morales
Lt. Governor

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

#### **MEMORANDUM**

DATE: May 31, 2019

TO: Jeff Lewellin, Mining Act Team Leader, Mining Environmental Compliance Section

FROM: Alan Klatt, Environmental Scientist & Specialist, Surface Water Quality Bureau

RE: Request for Comments, Updated Closeout Plan, General Electric and United Nuclear Corporation, St. Anthony Mine, McKinley County, MMD Permit No. MK006RE

On April 9, 2019, the Surface Water Quality Bureau (SWQB) received a request for comments regarding the subject permitting action for the St. Anthony Mine which is located in Cibola County, New Mexico on land owned by the Cebolleta Land Grant. The United Nuclear Corporation operated the St. Anthony Mine, which comprised an open pit and underground shaft uranium mine, from 1975 to 1981. The area disturbed during mining encompasses approximately 430 acres. The Updated Closeout Plan proposes to backfill and cover 2 pits, stabilize waste piles, and revegetate disturbed areas with the goals of a self-sustaining ecosystem. SWQB has completed its review of the 2019 Updated Saint Anthony Mine Closeout Plan, and has prepared the following comments pursuant to 19.10.5.506 J.(5) New Mexico Administrative Code (NMAC):

- Meyer Draw runs through the mine site and is located within the 12-digit Hydrologic Unit Code 130202070802 named Arroyo del Valle. Meyer Draw and Arroyo del Valle flow to Arroyo Conchas, the Rio San Jose, the Rio Puerco, and ultimately the Rio Grande. The non-perennial portions of Meyer Draw and Arroyo del Valle that are located within the State of New Mexico are subject to 20.6.4.98 NMAC and have designated uses for livestock watering, wildlife habitat, marginal warmwater aquatic life and primary contact (State of New Mexico, Standards for Interstate and Intrastate Surface Waters).
- The January 2006 St. Anthony Mine Site Closeout Plan states that "Material piles will be set back 50 feet from the edge of the natural channels", and the 2018 Supplemental Investigations Work Plan states that "A preliminary arroyo setback analysis will be conducted and Stantec will communicate up to 2 design alternatives for arroyo stabilization in addition to a setback consideration (if necessary)." The 2019 Updated St. Anthony Mine Closeout Plan does not appear to discuss setbacks and states that the "proposed closure plan for Pile 4 is to push the pile material to the borders of the Meyer Draw and the East Tributary arroyos that flanks the southwest and eastern edges of the pile". SWQB requests additional information and clarification regarding what the proposed arroyo

setback distance is, and how the setback distance was determined to be sufficient in terms of protecting state surface water quality standards. This is critical given that (1) the 2008 Materials Characterization Report, which included synthetic precipitation leaching procedure (SPLP) results to evaluate the potential for leaching metals into groundwater and surface water, found that gross alpha and Ra-226 exceeded the New Mexico water quality standards, and (2) water quality grab samples reported in the 2006 Site Closeout Plan indicate substantial increases from upstream to downstream of the project area for multiple water quality constituents including, but not limited to, gross alpha, radium 226+228, and uranium.

- The altered arroyo alignment discussed in Appendix E.2 of the 2019 Updated Closeout Plan identifies channel pinch points with "abnormally steep slopes" where "the gradients along the arroyo profile appear to be in a state of non-equilibrium as they continue to adjust to impacts of these mining activities". Figure 2 in Appendix E.2 shows a comparison of 1935 and 2011 aerial imagery which shows that the arroyo configuration in 1935 had greater sinuosity prior to mining activities. SWQB recommends incorporating sinuosity and meander pattern into the restoration design. Using roller compacted concrete and riprap to harden Meyer Draw in order to stabilize the straightened channel configuration may require long term monitoring and maintenance that may be contrary to a self-sustaining ecosystem.
- Channel stabilization measures such as the gradient control and riprap structures may require
  permit coverage under Section 404 of the Clean Water Act. This permitting was not discussed under
  Section 8.2 of the 2019 Updated Closeout Plan. For questions about this permitting, please contact:

US Army Corps of Engineers, Albuquerque District, Regulatory Division 4101 Jefferson Plaza NE Albuquerque, New Mexico 87109-3435 Ph: 505-342-3678

The St. Anthony mine is currently covered under Section 402 (NPDES) of the Clean Water Act, 2015
Multi-Sector General Permit (MSGP) Tracking Number NMR053470 for Sector G2 Metal Mining. The
SWPPP for this facility must be updated to incorporate this work. Section 9.6.2.2 of the MSGP
Permit describes additional New Mexico specific requirements for inspections and stabilization.
Coverage under the 2015 MSGP for Sector G Metal Mining Facilities may not require additional
Construction General Permit Coverage for reclamation activities. For additional information,
contact:

EPA Region 6 1445 Ross Avenue Suite 1200 Dallas, Texas 75202

Ph: 800-887-6063 or 214-665-2760 if calling from outside Region 6

You may also contact Jennifer Foote, SWQB, at (505) 827-0596 if you have questions about NPDES MSGP coverage.

If you have any other questions related to these comments, please contact me at 505-827-0388.



> Hawie C. Moraies Lt. Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

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James C. Kenney Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

#### **MEMORANDUM**

DATE: June 21, 2019

TO: Jeff Lewellin, Mining Act Team Leader

Mining Environmental Compliance Section, Ground Water Quality Bureau

FROM: Rhett Zyla, Environmental Scientist & Specialist

Modeling Section, Air Quality Bureau

RE: Request for Comments, Updated Closeout Plan, General Electric and United

Nuclear Corporation, St. Anthony Mine, McKinley County, MMD Permit No.

MK006RE

The New Mexico Air Quality Bureau (AQB) has completed its review of the above-mentioned mining reclamation Closeout Plan. Pursuant to the New Mexico Mining Act Rules, the AQB provides the following comments.

#### Air Quality Permitting History

The AQB has not issued any air quality permits for this operation.

## **Details**

Stantec Consulting Services, on behalf of United Nuclear Corporation (subsidiary of General Electric Company), has submitted the *St. Anthony Mine Closeout Plan*, dated March 19, 2019, for the St. Anthony Mine, in Cibola County, New Mexico. The *Closeout Plan* includes additional data from Stantec's 2018 submission to MMD, entitled, *Supplemental Investigations Work Plan – Work Plan for St. Anthony Mine Site*. The 2019 closeout plan updates the plan previously submitted to New Mexico Mining and Minerals Division (MMD) in January 2006. Per the definitions in NMAC 19.10.1.7 (A), land use following closure is intended to be livestock grazing (agricultural) and wildlife habitat, similar to the land located around the permit boundary area currently.

The St. Anthony Mine was an open pit and underground shaft uranium mine located on the Cebolleta Land Grant approximately 40 miles west of Albuquerque, New Mexico, in Cibola

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County approximately 4.6 miles southeast of Seboyeta, New Mexico. The surface and subsurface soil is expected to be impacted by radionuclides associated with the uranium decay series, with Ra-226 being the primary Constituent of Concern (COC). The mine site is in a remote, sparsely populated area with difficult access. The Site includes underground workings consisting of one shaft, one vent shaft that is sealed at the surface, two open pits (one containing a pit lake), five inactive ponds, seven piles of non-economical mine materials with some revegetation, numerous smaller piles of non-economical mine materials, and three topsoil piles. The two open pits at the mine site are located in Sections 19 and 30, Township 11 North, Range 4 West, and the entrance to the underground mine is located in Section 24, Township 11 North, Range 5 West. The mine permit boundary area encompasses approximately 430 acres and includes roads and other disturbed areas along with the open pits and non-economical mine materials piles.

### Plan Highlights:

- The plan is intended to be implemented using the most appropriate technology and best management practices. The plan is based on site-specific data.
- Pit 1 will be partially backfilled with existing site materials to above the anticipated level
  of groundwater rebound, and Pit 2 will be backfilled to prevent ponding of surface
  water within the pit. Both pits will be covered with more than 3 feet of non-impacted
  soil and will be contoured to promote drainage (NMED, 2015).
- Measures are included to safeguard the public from unauthorized entry and to prevent
  falls from highwalls or pit edges. Site access is through a locked gate controlled by the
  land owner. A warning sign will be posted at the outer access gate indicating hazards
  exist and a permanent, protective cattle fence will be placed above the exposed Pit 1
  highwall, with additional warning signage attached to the fence at 300-ft intervals.
- Stormwater diversions were designed to minimize negative impacts on site hydrology and provide for public safety. Stantec considered the potential for landslides related to the proposed site layout. Permanent stormwater diversion structures and the channel bank protections were designed to pass, at a minimum, peak runoff from the 100-year 24-hour precipitation event.
- The waste piles to remain in-place were designed to be stable and to limit erosion.
- Temporary roads are included for construction; no permanent roads are planned.
   Existing roads will be reclaimed and revegetated following closure.
- The disturbed areas including the pit backfill will be stabilized using grading, erosion control measures, and revegetation following excavation with the goals of a selfsustaining ecosystem and preventing soil erosion. A site-specific revegetation, seed mix was developed for the revegetation program.

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### **Air Quality Requirements**

The New Mexico Mining Act of 1993 states that "Nothing in the New Mexico Mining Act shall supersede current or future requirements and standards of any other applicable federal or state law." Thus, the applicant is expected to comply with all requirements of federal and state laws pertaining to air quality. Current requirements which may be applicable in this mining project include, but are not limited to the following:

Paragraph (1) of Subsection A of 20.2.72.200 NMAC, *Application for Construction, Modification, NSPS, and NESHAP - Permits and Revisions*, states that air quality permits must be obtained by:

"Any person constructing a stationary source which has a potential emission rate greater than 10 pounds per hour or 25 tons per year of any regulated air contaminant for which there is a National or New Mexico Ambient Air Quality Standard. If the specified threshold in this subsection is exceeded for any one regulated air contaminant, all regulated air contaminants with National or New Mexico Ambient Air Quality Standards emitted are subject to permit review."

Further, Paragraph (3) of this subsection states that air quality permits must be obtained by:

"Any person constructing or modifying any source or installing any equipment which is subject to 20.2.77 NMAC, New Source Performance Standards, 20.2.78 NMAC, Emission Standards for Hazardous Air Pollutants, or any other New Mexico Air Quality Control Regulation which contains emission limitations for any regulated air contaminant."

Also, Paragraph (1) of Subsection A of 20.2.73.200 NMAC, Notice of Intent, states that:

"Any owner or operator intending to construct a new stationary source which has a potential emission rate greater than 10 tons per year of any regulated air contaminant or 1 ton per year of lead shall file a notice of intent with the department."

The above is not intended to be an exhaustive list of all requirements that could apply. The applicant should be aware that this evaluation does not supersede the requirements of any current federal or state air quality requirement.

## **Fugitive Dust**

Air emissions from this project should be evaluated to determine if an air quality permit is required pursuant to 20.2.72.200.A NMAC (e.g. 10 lb/hour or 25 TPY). Fugitive dust is a common problem at mining sites and this project will temporarily impact air quality as a result of these emissions. However, with the appropriate dust control measures in place, the

Request for Comments, Updated Closeout Plan, General Electric and United Nuclear Corporation, St. Anthony
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increased levels should be minimal. Disturbed surface areas, within and adjacent to the project area, should be reclaimed to avoid long-term problems with erosion and fugitive dust. EPA's Compilation of Air Pollutant Emission Factors, AP-42, "Miscellaneous Sources" lists a variety of control strategies that can be included in a comprehensive facility dust control plan. A few possible control strategies are listed below:

Paved roads: covering of loads in trucks to eliminate truck spillage, paving of access areas to sites, vacuum sweeping, water flushing, and broom sweeping and flushing.

Material handling: wind speed reduction and wet suppression, including watering and application of surfactants (wet suppression should not confound track out problems).

Bulldozing: wet suppression of materials to "optimum moisture" for compaction.

Scraping: wet suppression of scraper travel routes.

Storage piles: enclosure or covering of piles, application of surfactants.

Miscellaneous fugitive dust sources: watering, application of surfactants or reduction of surface wind speed with windbreaks or source enclosures.

## Recommendation

The AQB has reviewed the updated Closeout Plan, and finds the proposed activities are likely to have minimal air quality impacts if the above recommendations are followed. The AQB has no objection to the request for the Closeout permit.

The applicant is expected to comply with all requirements of federal and state laws pertaining to air quality. This written evaluation does not supersede the applicability of any forthcoming state or federal regulations.

If you have any questions, please contact me at (505) 476-4304.



Howie C. Morales
Lieutenant Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

**Ground Water Quality Bureau** 

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

Certified Mail - Return Receipt Requested

August 16, 2019

Roy Blickwedel (roy.blickwedel@ge.com)
Remedial Project Manager
Global Operations, Environment, Health and Safety
GE
475 Creamery Way
Exton, PA 19341

RE: St. Anthony Mine Closeout Plan Updated 2019

Dear Mr. Blickwedel,

The New Mexico Environment Department (NMED) has received the *St. Anthony Mine Closeout Plan Updated 2019* (2019 Closeout Plan) from Stantec Consulting Services, Inc (Stantec) for the United Nuclear Corporation (UNC) and General Electric (GE) St. Anthony Mine, dated March 29, 2019. The New Mexico Mining and Minerals Division (MMD) sent NMED a request for comments on the 2019 Closeout Plan Act dated April 8,2019 in accordance with the New Mexico Mining Act. NMED provided general comments to MMD in a July 17, 2019 memorandum.

Pursuant to the Water Quality Act and Water Quality Control Commission regulations, NMED administers an Abatement Plan for the St. Anthony Mine to address ground water contamination from previous mining operations. As noted in the July 17, 2019 memorandum to MMD, NMED is providing additional comments related to the Abatement Plan directly to UNC.

1) The Water Quality Control Commission (WQCC) approved Alternative Abatement Standards (AAS) in a Proposed Findings of Fact, Conclusions of Law, and Final Order dated September 29, 2017. Finding of Fact number 33 references three conditions contained within the NMED approval of the Stage 2 Abatement Plan upon which the AAS are predicated. Finding of Fact 33.b includes the NMED condition of approval that "the surface be regraded and recontoured in a way that would allow for positive drainage". The NMED Stage 2 Abatement Plan conditional approval letter dated May 7, 2015, Condition 4 states "...the backfilled pit has a minimum of 3 feet of unimpacted

material at the surface, and is contoured to promote positive drainage away from the backfilled pit." These conditions were based on the information provided as part of the Stage 2 Abatement Plan submitted to NMED. The design for pit backfill proposed in the 2019 Closeout Plan does not meet this requirement.

2) UNC has informed NMED that following backfill of the Large Pit, the potentiometric surface in the Jackpile sandstone will rise above the level of the Dakota sandstone geologic unit and likely result in impacted water entering this geologic unit. The AAS were granted only for the Jackpile sandstone water bearing unit.

As proposed, the 2019 Closeout Plan does not meet the criteria included within the NMED approved Stage 2 Abatement Plan upon which the AAS approved by the WQCC are based. Based on recent conversations with UNC and consultants representing UNC, it is NMED's understanding that efforts are underway to revise the 2019 Closeout Plan and provide an alternative engineering design to address these inconsistencies. NMED is open to meeting with UNC to discuss conceptual alternate engineering design options. It is recommended that MMD be included in any such discussions to ensure an alternate design also meet the requirements of the New Mexico Mining Act.

NMED requests a response within 30 days of the date of this letter to determine an appropriate path forward.

Please contact me at 505-827-0195 or kurt.vollbrecht@state.nm.us with any further inquiries.

Sincerely,

Kurt Vollbrecht, Manager

New Mexico Environment Department Mining Environmental Compliance Section

KV:ar

Ecc: Jason Cumbers, Stantec Consulting Services, jason.cumbers@stantec.com

Cindy Ardito, Intera Incorporated, <u>cardito@intera.com</u>
Holland Shepherd, MMD, <u>holland.shepherd@state.nm.us</u>
Annie Maxfield, NMED OGC <u>Annie.Maxfield@state.nm.us</u>

## Linis, David, EMNRD

From: Rappuhn, Doug H., OSE

**Sent:** Thursday, June 6, 2019 6:54 PM

To: Ennis, David, EMNRD

Cc: Musharrafieh, Ghassan R., OSE

Subject: Request for Comments on St. Anthony Mine Closeout Plan Updated 2019, Cibola Co., NM, Permit

No. MK006RE

Hello Mr. Ennis -

The NMOSE Hydrology Bureau received the MMD's April 8, 2019 request for comments on the subject St. Anthony Mine Closeout Plan 2019 Update, and have reviewed same.

Applicant's plans to excavate local fill, re-contour project land surface, and backfill mine pits appear to exclude new use of surface or ground water, and local surface water impoundment will be decreased by reclamation of the project pits. Should proposed reclamation activities require the development or use of onsite water resources for compaction, contaminant remediation, or other purposes, the NMOSE District 1 Office (5550 San Antonio Drive NE, Albuquerque, NM 87109-4127; 505-383-4000) should be contacted to discuss the need for water rights.

It appears resource evaluation drilling conducted over the past year did not penetrate water-bearing strata, and was often conducted into surface stockpiles of mine waste, therefore NMOSE well construction permits were not required. Should future drilling deeper than 30' encounter groundwater, the Applicant must pursue NMOSE permitting for the drilling, and the drilling be conducted (as was last year) by the firm of a New Mexico-licensed well driller.

Thanks for the opportunity to review the proposed reclamation work.

#### Douglas H. Rappuhn, P.G.

Hydrology Bureau / New Mexico Office of the State Engineer 5550 San Antonio Drive NE Albuquerque, NM 87109-4127
Phone: 505-383-4000: Fav: 505-383-4030

Phone: 505-383-4000; Fax: 505-383-4030 e-mail: <a href="mailto:doug.rappuhn@state.nm.us">doug.rappuhn@state.nm.us</a>

From: Rodriguez, Stephanie, EMNRD Sent: Monday, April 8, 2019 11:59 AM To: Musharrafieh, Ghassan R., OSE

Çc: Ennis, David, EMNRD

Şüpject: Request for Comments on St. Anthony Mine Closeout Plan Updated 2019, Cibola Co., NM, Permit No. MK006RE

Attached is your electronic copy of the April 8, 2019, letter mailed to Dr. Ghassan Musharrafieh, Office of the State Engineer, from David (DJ) Ennis, Permit Lead, MARP/MMD, regarding the above-referenced subject. Please print copies for your files as needed.

Thank you,

Stephanie J. Rodriguez

Records Manager
Mining Act Reclamation Program
Mining and Minerals Division
staphanie.rodriguez@state.nm.us