

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Michelle Lujan Grisham**  
Governor

**Sarah Cottrell Propst**  
Cabinet Secretary

**Todd Leahy, JD, Ph.D.**  
Deputy Cabinet Secretary

**Mike Tompson, Interim Director**  
Mining and Minerals Division



December 30, 2019

Mr. Jon Nickel, Environmental Scientist  
CDM Smith Inc.,  
560 North Park Avenue, Suite 300  
Helena, Montana 59601

**Re: Site Wide Closeout Plan Update Application Response, Permit Modification 16-1, Permit No. TA002RE, El Grande Mine**

Dear Mr. Nickel,

This letter pertains to the Site Wide Closeout Plan Update Application, Modification 16-1, for the El Grande Mine (TA002RE) ("Application"), submitted on August 27, 2018, which is currently pending before the New Mexico Mining & Minerals Division ("MMD"). Below, please find MMD's comments to the response letter submitted by CDM Smith on behalf of Dicaperl Mineral Corp. ("Dicaperl") dated November 20, 2019. The comment numbers are in reference to the November 20, 2019 response letter, with one additional and novel comment at the end of this letter.

1. Please provide an explanation, schematic, map, photographs, and/or other means of identification to describe the elements of the "MILL AREA" identified in Figure 3-1 of the August 27, 2018 PAP. This area also includes the bone yard. Include which elements will remain on site, and which elements will be demolished within 180 days of Permit Mod 16-1 approval. Additionally, as with the cost estimate included in the PAP of Mod 16-1 for the Socorro Mine (Permit No. SO001RE), please include an additional 20% of the maintenance shop, mill buildings, and equipment shop building demolition costs to include all equipment to be removed from inside the buildings.
2. This response is acceptable to MMD.
3. The referenced changes to the November 2019 SRCE spreadsheet are acceptable to MMD.
4. The referenced changes to the November 2019 SRCE spreadsheet are acceptable to MMD.
5. This response and the referenced changes to the November 2019 SRCE spreadsheet are acceptable to MMD.
6. The referenced changes to the November 2019 SRCE spreadsheet are acceptable to MMD.
7. This response is acceptable to MMD.

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8. Please update the "Quarries & Borrow Pits" tab in the November 2019 SRCE to include the costs of covering the quarry with 12" of cover material.
9. This response is acceptable to MMD.
10. This response is acceptable to MMD.
11. After MMD's review of the SRCE spreadsheet submitted on November 20, 2019, MMD requests that Dicaperl make the following changes to the SRCE spreadsheet to incorporate elements that were included in the Socorro Mine, Permit No. SO001RE, but were not found in the El Grande SRCE spreadsheet submitted on November 20, 2019:
  - a. Update the "Misc. Costs" tab to include reclamation costs associated with removing transformers, pipelines, fencing, etc.
  - b. Update the "Monitoring" tab to include costs associated with travel for the individual(s) monitoring the reclamation.
  - c. Update the "Constr. Mgmt" tab to include costs associated with a temporary office rental and use of a water truck and grader during reclamation.

Please provide a response to these items within 30-days of receipt of this letter. If you have any questions or would like to schedule a meeting to further discuss this letter, please contact me at (505) 476-3423 or at [carmen.rose@state.nm.us](mailto:carmen.rose@state.nm.us).

Sincerely,



Carmen Rose, *Permit Lead*  
Mining Act Reclamation Program ("MARF")

cc: Rocky Torgrimson, *Operations Manager, Dicalite Minerals Corporation*  
Allen Norris, *Plant Manager, Dicaperl Minerals Corporation*  
Holland Shepherd, *Manager, MARF*  
David Ogori, *Senior Reclamation Specialist, MARF*