Michele Lujan Grisham Governor

Sarah Cottrell Propst Cabinet Secretary

Todd Leahy, JD, PhD Deputy Cabinet Secretary Jerry Schoeppner, Director Mining and Minerals Division



Electronic Transmission

October 5, 2020

Joseph McEnaney St. Cloud Mining Company, Zeolite Mine & Mill P.O. Box 196 761 St. Cloud Mine Road Winston, New Mexico, 89743

RE: MMD Additional Technical Comments, Zeolite Mine and Mill Modification 20-1 Application, Permit No. SI006RE – Sierra County, New Mexico

Dear Mr. McEnaney,

The New Mexico Mining and Minerals Division ("MMD") received the submittal from St. Cloud Mining Company's "*Responses to Agency Review Comments and Request for Additional Information, Zeolite Mine Modification 20-1 Application, Permit No. SI006RE – Sierra County, New Mexico*", dated August 4, 2020 and September 2, 2020.

MMD has reviewed the responses and has additional comments. Please respond no later than 30 days of receipt of this letter, to the information requested.

- 1. St. Cloud's response to the second comment states "Attachment 2 is a quotation from Wagner Equipment Rental" but there is no attachment. Please provide MMD the Wagner Equipment Rental quote.
- 2. Please provide MMD the Caterpillar specification sheet for the Fuel Burn for the D9 as well as the Winston General Store receipt for diesel fuel which are mentioned in St. Cloud's response to the comment 4.
- 3. There are a few errors with the St. Cloud Mining Revegetation Cost Estimate table that need to be addressed. It appears that the per diems for tasks 1-3 are for two personnel and not for the three proposed earlier in the table. Also, the cost per acre is calculated using 43 acres and not the updated 35.8 acres. Once these changes are made, please make sure to update page 7 of the excel spreadsheet.
- 4. Please update page 8 of the excel spreadsheet using the \$1,200 cost from St. Cloud's response to comment 10.
- 5. Page 6 of the excel spreadsheet is missing the dozer cost for the excavation of the sediment pond spillways. Please include the dozer cost from page 4 on page 6.
- 6. Please provide MMD the table from Drawing 7 since it is blurry and unreadable in the pdf we received.

MMD Additional Technical Comments, Zeolite Mine and Mill Modification 20-1 Application, Permit No. SI006RE – Sierra County, New Mexico

October 5, 2020

Page 2 of 2

7. Modification 13-1 vegetation standards require a minimum of 2 species of cool season grasses with at least 0.5% cover each. MMD will require including a second cool season grass in the seed mix to help meet vegetation standards at the time of financial assurance release. In lieu of including Indian ricegrass in the seed mix, MMD suggests either using bottlebrush squirreltail at the same recommended seeding rate as Indian ricegrass or suggesting another native cool season grass to be included in the seed mix.

Should you have any questions, comments, or require additional information concerning this letter or any enclosures, please contact me at (505) 470-5354, or via email at: jennifere.johnson@state.nm.us.

Sincerely,

Jennifer Johnson

Jenn Johnson, Permit Lead Mining Act Reclamation Program ("MARP")

cc: Audie Padilla, Superintendent, St. Cloud Mining John Bokich, GMB16, LLC Holland Shepherd, Program Manager, MARP Mine File (SI006RE)