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22 September 2023

Kevin Myers, Permit Lead  
Mining Act Reclamation Program  
Mining and Minerals Division (MMD)  
1220 South St. Francis Drive  
Santa Fe, NM 87505

***RE: New Minimal Impact Exploration Permit Application, CN Exploration Project, Catron County, New Mexico. Permit No. CA028EM; NMDGF Project No. NMERT-2851.***

Dear Mr. Myers,

The New Mexico Department of Game and Fish (Department) has reviewed the above referenced exploration project submitted by Sierra Gold and Silver, Ltd. (Sierra). Sierra is proposing to drill 16 exploratory holes at 10 drill pad sites. Hole depths will be approximately 300 feet. The exploration project will be located in Sections 34 and 35 in Township 9S, Range 9W and in Section 3 in Township 10S, Range 9W. The total area that will be disturbed is approximately 0.3 acres. Staff from the Department, MMD, U.S. Forest Service (USFS), New Mexico Environment Department, and the Operator conducted a site inspection on 14 September 2023.

All 10 proposed drill pad sites will be located on existing USFS roads and no vegetation removal or clearing is anticipated in undisturbed habitat. The Department supports the use of existing roads as drill pad sites to avoid any unnecessary disturbance to forest habitat.

In the permit application, it states that Sierra will use a closed loop drilling system. However, during the site inspection, when the Department asked for more details about the drilling system, the Operator described a system that would utilize a mud pit and not a fully contained, closed loop system. The Department requests that Sierra clarify if excavated mud pits or a fully contained, closed loop will be used. The Department strongly recommends the use of a closed loop drilling system. Closed loop systems eliminate the need to build fences or install netting to exclude wildlife from mud pits, reduce the amount of surface disturbance associated with the drill pad site, and consume significantly less water. If Sierra ultimately uses mud pits, the Department recommends netting or covering fenced mud pits to exclude birds and bats. If netting is used, the Department recommends extruded plastic, knit, or woven netting with a mesh size of three eighths inches to exclude smaller animals. The Department does not support the use of monofilament netting due to its tendency to ensnare wildlife, usually resulting in injury or death. Netting material must be held taught over a rigid and adequately supportive frame to prevent sagging into the mud pits.

It is important to prevent wildlife from entering and becoming trapped in stockpiled pipes used in the drilling process. The Department recommends capping drill pipes as the most effective way to prevent wildlife entry. At a minimum, each section of pipe should be visually inspected prior to use to verify that no wildlife, including small mammals or reptiles, are inside.

For site reclamation, Sierra proposes to use a USFS seed mix. The Department recommends that only native plant species are used and that the reclamation seed mix is designed to enhance local pollinator habitat. The Department also recommends that only certified weed-free seed be used to avoid inadvertently introducing non-native species to the reclamation site. Any alternate plant species, used to substitute for primary plant species that are unavailable at the time of reclamation, should also be native. When possible, the Department recommends using seeds that are sourced from the same region and habitat type as the reclamation site and suggests including seeds from a region that represents potential future climatic conditions at the site.

Thank you for the opportunity to review and comment on the proposed exploration project. If you have any questions, please contact Ron Kellermueller, Mining and Energy Habitat Specialist, at (505) 270-6612 or [ronald.kellermueller@dgf.nm.gov](mailto:ronald.kellermueller@dgf.nm.gov).

Sincerely,

Matt Wunder, Ph.D.  
Chief, Ecological and Environmental Planning Division  
cc: USFWS NMES Field Office