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20 November 2023

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

RE: Alkali Flats Lithium Brine Phase 1 Minimal Impact Exploration Project, Hidalgo County, New Mexico. Permit No. HI023EM; NMDGF Project No. NMERT-3005.

Dear Ms. Rynas,

The New Mexico Department of Game and Fish (Department) has reviewed the above referenced exploration project submitted by Lancaster Resources, Inc. (Lancaster). Lancaster is proposing to drill 3 exploratory holes at 3 drill pad sites. Hole depths will range from approximately 500-2,600 feet. The exploration project will be located on Bureau of Land Management (BLM) administered land in Section 15, Township 23S, Range 20W. The total area that will be disturbed is approximately 1.8 acres.

The permit application states that a mud/fluid drilling system will be used. For mud/fluid drilling 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 Lancaster does use 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, Lancaster proposes to use a BLM native seed mix. The Department recommends that the BLM seed mix is appropriate for the playa's saline soil and promotes soil stability. 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.

Sincerely,

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