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3 July 2024

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

RE: Minimal Impact Exploration Permit Application, Alhambra Exploration Project, Standard Silver Corporation. Permit No. GR094EM; NMDGF Project No. NMERT-3481.

Dear Ms. Osimowicz,

The New Mexico Department of Game and Fish (Department) has reviewed the above referenced exploration project submitted by Standard Silver Corporation (Standard). Standard is proposing to drill up to 75 exploratory holes at nine drill pad sites. The hole depths will range from approximately 75 to 200 feet. The exploration project will be in Section 21 in Township 18S, Range 15W. The total area that will be disturbed by proposed activities is approximately 3.48 acres. Staff from the Department, MMD, New Mexico Environment Department, and Standard conducted a site inspection on 25 June 2024.

Standard is proposing to use a closed loop drilling system, which the Department fully supports and recommends. If the containment system for the drilling fluids is not fully enclosed, the Department recommends netting or covering any open containment tanks in order 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 of an inch 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 drilling fluids.

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.

All proposed drill pad sites, where exploratory holes will be drilled, will be located in previously-disturbed areas such that no mature woody vegetation will be removed. As a result, the Department does not anticipate any significant impacts to wildlife or forest habitat from the proposed exploration project.

For site reclamation, Standard proposes to use a seed mix specified by the U.S. Forest Service. The Department recommends using only native plant species 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@dof.nm.gov.

Sincerely,

Virginia Seamster, Ph.D.
Assistant Chief for Technical Guidance

cc: USFWS NMES Field Office