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24 September 2026
Charles Barber, Permit Lead
Mining Act Reclamation Program
Mining and Minerals Division (MMD)
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Modification to Update Closure/Closeout Plan, St. Cloud Zeolite Mine, Sierra County, New Mexico, Permit No. SI006RE; NMDOW No. NMERT-6178.

Dear Mr. Barber,

The New Mexico Department of Wildlife (Department) has reviewed the St. Cloud Mining Company's (St. Cloud's) modification to update the Closure/Closeout Plan (CCP) referenced above. Staff from the Department, MMD, and St. Cloud conducted a site inspection on 18 September 2026.

In Table 3, Zeolite Mine Reclamation Seed Mix, only the common plant names are listed. The Department recommends that St. Cloud also includes the scientific names in this seed mix table. Also in Table 3, wand-boom penstemon should be wand-**bloom** penstemon (*Penstemon virgatus*).

The Department concurs with the proposed reclamation seed mix and recommends that St. Cloud consider adding some additional plant species that are beneficial for pollinating insects. A more pollinator-friendly seed mix should include a diversity of flowering plants with different colors and shapes and flowering times that span spring through fall (March-October). Rarer plants, perennials, native bunch grasses and thistles, some plants with pithy and woody stems, some bare ground, and high-nutrient or value plants (e.g., goldenrods [*Solidago* spp.], gumweed [*Grindelia* spp.], or sunflowers [*Helianthus* spp.]) may be beneficial to pollinators. Ideally, at least three different species should be flowering at all times between March and October. Consult pollinator-friendly plant species lists provided by the [Xerces Society for Invertebrate Conservation](#) or other appropriate resources, including the [Ecological Revegetation Application](#). No-till drills may be more effective than broadcast seeding for establishing flowering plants. The Department also recommends that the seed mix and mulch be certified weed-free to avoid inadvertently introducing non-native species to the reclamation site and that sterile non-native seed sources not be used. If using mulch, a shallow layer of pebbles or compost, leaf litter, plant debris, or wood are preferred over plastic mulch. 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. Include as much locally appropriate genetic diversity in seed sources as possible.

During the site inspection Department staff observed minor rill erosion occurring on the 2026 mine reclamation site that should be remedied before further downcutting can occur. Also noted were the use of straw wattles with plastic mesh to control erosion. After the straw material has decomposed, it leaves behind exposed plastic mesh material that can ensnare and kill snakes and lizards. The Department recommends that St. Cloud remove all exposed plastic mesh material after the straw has decomposed. The Department also recommends that St. Cloud use straw wattles that are made with natural, 100% biodegradable outer nettings like burlap, jute, or sisal instead of polypropylene or photodegradable plastic mesh.

Thank you for the opportunity to review and comment on the updated CCP. 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,

Virginia Seamster, Ph.D.
Assistant Chief for Technical Guidance
Wildlife Management Division, Ecological and Environmental Planning Section

cc: USFWS NMES Field Office