



File Code: 2810

Date: July 26, 2024

Richard Kern  
Bonaventure Nevada Inc.  
5560 Rue St Tropez  
Reno, NV 89511

Dear Mr. Kern,

This letter in receipt of Bonaventure Nevada Inc.'s (Bonaventure) Plan of Operations (POO) to conduct mineral exploration activities. The POO was received on November 16<sup>th</sup>, 2022, by the Silver City Ranger District, Gila National Forest (Gila NF). A revised POO was submitted to the Gila NF on February 28<sup>th</sup>, 2023. On May 1<sup>st</sup>, 2023, the POO was determined to be administratively complete, however, due to differences between what was stated in the New Mexico's Energy, Minerals and Natural Resources Department Minerals and Mining Division (MMD) permit application and the current POO revision, a subsequent revision was requested. A site visit between Bonaventure, MMD, and the Gila NF took place on September 28<sup>th</sup>, 2023, and a revised POO was received on October 4<sup>th</sup>, 2023. On April 24<sup>th</sup>, 2024, a revision to the October 4<sup>th</sup> POO was received, after suggested changes were made to the MMD permit. Activities are proposed in Sections 18, T19S, R15W, New Mexico Prime Meridian, Grant County, New Mexico.

Proposed activities include exploration drilling from 11 constructed drill pads. In total, 10,799 feet (2.04 mi) of maintenance of existing trail, 80 feet (.015 mi) of repair of an existing road. The construction of 1,709 feet (.32 mi) of new road is proposed to access the remaining four drill pads. Roads and trails are expected to be 10 feet wide or less. Dimension of drill pads are not to exceed 50 feet X 100 feet in area. Each drill site will have a sump measuring 10 feet by 20 feet by 5 feet deep. Sumps will only be constructed as determined necessary. In addition, a laydown of 50 feet by 50 feet will be used. Drilling will be accomplished utilizing a truck or rubber-tired core or reverse circulation drill rig to drill 5-inch diameter reverse circulation or 4-inch core holes at each drill pad. Water for drilling will be obtained either from the town of Tyrone or from a private landowner. 11 drill holes will be drilled to a maximum of 300 feet. All earthworks will be completed with a Caterpillar D6 dozer, backhoe, or equivalent equipment. A four-wheel drive water truck with 2,000-to-4,000-gallon capacity will be used. Total area of disturbance, including drill pads, existing road maintenance, and constructed roads is estimated to be 4.0101 acres.

Reclamation includes, drill holes will be grouted to total depth upon completion and completed to the methods described in 19.27.4 NMAC of the State Engineer's Office. If subsurface waters are encountered, the holes will be abandoned as wells with neat cement slurry. All necessary earth work will be recontoured and disturbed areas reseeded with approved seed mix. All newly constructed access routes will also be reclaimed and seeded. The proposed project including reclamation is scheduled to be completed within one year of commencement of ground disturbance.

It is my determination that the revised POO received on April 24<sup>th</sup> covers the requirements of the regulations (36 CFR 228.4(c)). An interdisciplinary team has been assigned to analyze and disclose the




environmental impacts from the proposed activity, as required under the National Environmental Policy Act (NEPA). I appreciate your willingness to subcontract out the cultural survey, it was accepted and reviewed. This analysis will include the consideration of comments solicited from the public and from other governmental agencies. We anticipate completing the NEPA analysis later this summer (August 2024).

Following completion of the NEPA analysis, you will either appeal and/or accept any mitigations the Forest deems necessary to minimize adverse impacts, in addition to posting an acceptable reclamation bond in accordance with 36 CFR 228.13. The reclamation bond will be coordinated between you, the Gila NF and the State of New Mexico's Energy, Minerals, and Natural Resources Department – Mining and Minerals Division.

Feel free to contact myself at [elizabeth.toney@usda.gov](mailto:elizabeth.toney@usda.gov), (575) 388-8430, or Antonio (Tony) Ybarra, at [antonio.ybarra2@usda.gov](mailto:antonio.ybarra2@usda.gov), (575) 388-8460 for any questions.

Sincerely,

  
for Elizabeth Toney  
District Ranger

cc: Forest Service – Jenna Padilla, Antonio Ybarra, Harley Allsup, Joseph Jaffa-Martinez  
New Mexico EMNRD-MMD – David (DJ) Ennis