

11/7/2018

DEPARTMENT OF THE INTERIOR Mail - DEVA - Keystone Mine - Updated Briefing Statement



Wines, Abigail (Abby) <abby_wines@nps.gov>

DEVA - Keystone Mine - Updated Briefing Statement

Reynolds (DEVA), Mike <mike_reynolds@nps.gov>

Sat, Aug 11, 2018 at 2:57 PM

To: "Abigail (Abby) Wines" <abby_wines@nps.gov>, Josh Hoines <josh_hoines@nps.gov>

Mike Reynolds
Superintendent
Death Valley National Park
760-786-3240

----- Forwarded message -----

From: **Brunner, Julia** <julia_f_brunner@nps.gov>
Date: Fri, Aug 10, 2018 at 3:46 PM
Subject: Re: DEVA - Keystone Mine - Updated Briefing Statement
To: "Reynolds (DEVA), Mike" <mike_reynolds@nps.gov>

Hi Mike -- Thanks for the heads up. Important note though -- I am not a solicitor. I do have a law degree but in my capacity here at GRD am a "regulatory specialist." Nonetheless I spend a lot of time working with the attorneys in SOL in the application of our various regulations and other mandates.

Quick talking points for you: BLM and NPS are working collaboratively and efficiently together here, very much consistent with Sec. Zinke's vision of "One DOI." The NPS is not seeking to apply its regulations to the portion of the operation that is on BLM lands, just the portion within the park, and we didn't even get a separate plan of operation for that (which, under the regs, we should have). And, we are not requiring a validity exam prior to his use of the millsites in the park; this deviates from our overall policy. In short, we have made a lot of concessions for Mr. McLaughlin.

Hope this helps!

Julia Brunner
Energy and Minerals Branch
Geologic Resources Division
National Park Service
303-969-2012

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Mike Reynolds

Superintendent

Death Valley National Park

760-786-3240

On Tue, Oct 3, 2017 at 3:18 PM, Penman-Brotzman, Jonathan <jonathan_brotzman@nps.gov>

wrote:

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From: **Brunner, Julia** <julia_f_brunner@nps.gov>

Date: Tue, Oct 3, 2017 at 2:27 PM

Subject: draft letter accepting BMC's "plan of operations"

To: "Penman-Brotzman, Jonathan" <jonathan_brotzman@nps.gov>

Cc: Lisa Norby <lisa_norby@nps.gov>

Hi Jonathan -- as we discussed, I suggest that the NPS should accept BMC's Sept. 11 letter as a "proposed plan of operations" and initiate review and compliance under our 9A regulations. I know that BMC's letter does not come close to a real plan, but given the current administration's priorities, I think we should just accept it as a proposed plan and move on.

So I am sending you a draft acceptance letter. I am also sending you our old "NPS Procedures" document which explains the step-by-step approach for evaluating real plans of operation for mining claims and millsites.

As we discussed earlier today, one of the steps described in our 9A regs and the procedures is to publicize the proposed plan in the Federal Register. I sent an email to our Federal Register liaison, asking about how quickly the Federal Register process is working these days, but haven't heard back. I sort of feel as though this step has been supplanted by our ability to post project descriptions and EAs on PEPC, but let's talk tomorrow.

Thanks,

Julia Brunner

Energy and Minerals Branch

Geologic Resources Division

National Park Service

303-969-2012