

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 7
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January 17, 2024

Zoe Scopa
Cargill Incorporated
191 Portland Point Road, PO Box B
Lansing, New York 14882

**Re: Cayuga Salt Mine
Mined Land Reclamation Permit Modification
DEC ID#: 0-9999-00075/00001; Mine #: 70052**

NOTICE OF INCOMPLETE APPLICATION

Dear Zoe Scopa:

The New York State Department of Environmental Conservation (DEC) has reviewed the application materials for the above referenced project. According to the provided materials, Cargill Incorporated (Cargill) is requesting a modification to the Mined Land Reclamation Permit for the Cayuga Salt Mine to amend the facility's current water storage location in the life of mine area. The proposal includes the establishment of additional water storage capacity within the 6-Level region, providing storage of water for a minimum of 15 years at current inflow rates. The modification request does not include changes to existing and approved mining operations and methods, nor does it include a proposed expansion of the previously approved life of mine area.

Based upon our review of the submitted information, we have determined the application to be incomplete. Please provide the following information for application processing to proceed:

1. 2.3.2 – Water Handling and Storage: The recent annual report indicated that water labeled as “*Other Inflows*” is stored in various abandoned areas on the 6-Level of the mine. Please clarify that the proposed water storage area will be confined to only the 6-Level region (S3 Main and associated panels) that is depicted on Figure 2 in the application.
2. 2.4 – Assessment and Mitigation of Potential Environmental Impacts: The modification references studies that were contracted by Cargill to evaluate impacts to global stability of the mine. The Department is requesting that these reports and all supporting information be submitted to complete the review of this proposed action.
3. Appendix C – Cayuga Mine S3 Monitoring Plan: The last paragraph of Section 1.2 - Affected Areas states, “*Further work will include efforts to reduce inflow rates and exploration of other reserves within the Syracuse Salt Formation.*” Please expound on what these efforts may include and note that any exploration of reserves outside the permitted life of mine will need to be approved by the Department.
4. Appendix C – Cayuga Mine S3 Monitoring Plan: The final paragraph of Section 2.2 -

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Date: 1/17/2024

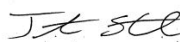
Convergence of the Cayuga Mine S3 Monitoring Plan states “*Convergence data collection will continue as long as safe access to all stations exists.*” Utilizing the same method used to estimate the life of the S3 sump (15 years) and the estimated time for the water to reach the roof in the southern limit of the mine (10 years), please estimate the approximate dates that convergence monitoring stations will be inundated, preventing safe access and necessitating the abandonment of the stations. Please show the estimated time of inundation and abandonment for each of the convergence stations on Figure 2 of the S3 Monitoring Plan (presenting a table with the monitoring station numbers and estimated inundation dates may be the most efficient method). Please address the progressive loss of monitoring stations with respect to the need for continued monitoring of global stability in the modification application narrative.

5. General: It’s noted in documents from the third-party consultant JT Boyd Company that a system will be constructed to saturate the water to be stored in the S3 Main approximately 24%-25% salt. There does not appear to be any mention of this system in the application materials, therefore, please provide such information.

No further action can be taken on the application until all of the requested information is received. Please respond with two written and one electronic copy of the requested materials. Be advised that due to the fact this is considered a major project, in accordance with Uniform Procedure Act (UPA), 6 NYCRR Part 621, Regulations, once the Department considers the application complete, it will be required to undergo 30 days of public notice. You as the applicant will be responsible for publishing the Notice of Complete Application in the official newspaper of the town in which the project will occur. Any comments received must be addressed before a final permit decision is made.

If you have technical questions regarding the above, please contact Tom Rigley at (315) 426-7412. Any other questions pertaining to this letter, please contact me at (315) 426-7444.

Sincerely,



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Stercho
Date: 2024.01.17 15:53:29 -05'00'

Jonathan Stercho
Deputy Regional Permit Administrator
Division of Environmental Permits, Region 7

cc: S. Wilczynski, Cargill, Inc.
E. Davidson, JMT
T. Rigley, R7 Minerals
K. Balduzzi, R7 RPA
M. Sheen, Regional Attorney