

May 6, 2026

Scott Cooke, District Manager  
Corey Durr, Minerals Program Lead  
Bureau of Land Management  
Las Cruces District Office  
1800 Marquess Street  
Las Cruces, NM 88005

Re: Antelope Pass Research Natural Area and Almadex America Inc. "Big Sky" Mining Claims

Dear District Manager Cooke and Mr. Durr,

On behalf of the undersigned conservation organizations, businesses, and local community members, we write to express serious concern regarding recent mining claims filed by Almadex America Inc. (Almadex) in the Antelope Pass area of Hidalgo County, New Mexico, and the company's announced activities on those claims involving at least preliminary surface-disturbing exploration and potential future mine development.

These concerns include the potential that mineral exploration and hardrock mining activities could significantly and adversely impact extraordinary biological values in the Peloncillo Mountains and Antelope Pass Research Natural Area (RNA), wildlife corridors and habitat connectivity, water resources, soils, cultural resources, recreation, tourism, astronomical research, and the local economy. Publicly available information on Almadex's website suggests that the company has already initiated at least casual ground disturbing exploration activities in the Antelope Pass area, although recent email communication with Mr. Durr highlight that, as of mid-March 2026, the Bureau of Land Management (BLM) had not yet received any Notice or proposed Plan of Operations from Almadex. We also are concerned that the activities described on Almadex's website<sup>1</sup> and in a recent press release<sup>2</sup> as already having been conducted and planned in the area may go beyond the limited "casual use" allowed for mineral exploration operations without notice to the BLM, as provided in 43 C.F.R. §§ 3809.5 and 3809.10(a).

The Antelope Pass landscape holds extraordinary ecological, scientific, cultural, social, and economic values. It is among the most biologically significant areas in the American Southwest and contains the Antelope Pass RNA, designated by the BLM specifically for protecting biological and research values. As described in more detail below, the governing land use plan (Mimbres Resource Management Plan (RMP)) designates a portion of the Antelope Pass RNA as closed to vehicle use, with vehicle use limited to designated roads and trails in the remainder of the RNA. BLM regulations prohibit even casual use operations involving motorized vehicle use in such closed or limited areas.<sup>3</sup> Vehicle use where prohibited in the RNA is inconsistent with the limitations in the Mimbres RMP and surface-disturbing mineral exploration in the Antelope Pass area would pose substantial risks to its resource values and would directly conflict with the conservation purpose for which the RNA was established. We detail these

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<sup>1</sup><https://www.almadexminerals.com/bigsky>

<sup>2</sup><https://static1.squarespace.com/static/63c1a540cd05091153717edf/t/69cd7ee9033a110f6fe27021/1775075081954/DEX-04-01-29.pdf>

<sup>3</sup>43 C.F.R. § 3809.5 (definition of casual use (1)-(2))

values and associated risks from mineral exploration and mining activities below, and provide recommendations for the BLM's analysis of and public engagement related to any casual use operations undertaken by Almadex and any Notice or proposed Plan of Operations the company submits for BLM review.

In sum, given the wide array of significant values associated with this landscape, and express restrictions and limitations on vehicle use within the Antelope Pass RNA, we respectfully request that the BLM investigate and evaluate whether the activities that Almadex has and may currently be undertaking in and near that RNA go beyond casual use operations (by use of motorized vehicles in closed/limited areas or by creating anything more than the "negligible" disturbance allowed in casual use operations), and whether Almadex has in fact reclaimed any casual-use disturbance it has created on any BLM-managed public lands in or near the RNA, as required by 43 C.F.R. § 3809.10(a). Should Almadex submit a Notice or proposed Plan of Operations for more intensive ground-disturbing activities, we also respectfully request that the BLM conduct both a robust public engagement process with interested stakeholders as well as detailed environmental and economic analyses related to any proposed operations to ensure that no exploration activity or mining occurs within or in a manner that causes unnecessary and undue degradation to the Antelope Pass RNA and the values and resources for which it was established.

### **Current Status of Almadex Mining Claims and Activities**

Based on publicly available BLM records, Almadex has filed at least 132 lode mining claims in the Antelope Pass landscape under Lead Files NM106719469 (SKY 1–65), NM106728812 (SKY 66–104), and NM106783498 (SKY 105–132), with the most recent claims filed in February 2026. The claims are located within the BLM's Las Cruces District and the majority appear to fall within the boundaries of the Antelope Pass RNA, with additional claims immediately surrounding it.

Almadex has identified this area as part of its "Big Sky Project," a high-sulphidation epithermal gold-silver exploration project, and has announced active rock sampling, soil sampling, and induced polarization (IP) geophysical work across the project area, including plans for "further IP exploration."<sup>4</sup> Public statements indicating that IP geophysical surveys have "commenced," with further IP surveying planned, raise serious concern that ground disturbing exploration activities may already be occurring within or immediately adjacent to the Antelope Pass RNA.<sup>5</sup>

Per March 11, 2026 email correspondence from Mr. Durr to Luke Koenig, Gila Grassroots Organizer with New Mexico Wild, we were informed that no Notice or Plan of Operation had been submitted by Almadex as of that date.

If Almadex has indeed begun conducting casual use operations as described in its public statements, which would not require notice to BLM, we nonetheless request that BLM investigate and evaluate if Almadex is complying with the regulatory requirements to not use vehicles in closed or limited use areas within the Antelope Pass RNA, create no more than negligible disturbance, and reclaim any casual-use disturbance it has created. If Almadex has

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<sup>4</sup> See Almadex sources cited in footnotes 1 & 2 above.

<sup>5</sup> *ibid.*

exceeded the regulatory limitations on casual use operations, the BLM should ask it to cease any activities that violate the casual use limitations and submit a Notice or Plan of Operations under 43 C.F.R. §§ 3809.21 or 3809.11 before conducting any further activities.

If Almadex has submitted either type of documentation required for more than casual use operations since Mr. Durr's March 11th email, we request that the BLM clarify what reviews the agency has conducted or what approvals have been issued, including whether biological, cultural, and environmental reviews have occurred, and whether proposed activities are consistent with applicable federal laws and regulations, the Mimbres RMP, and the management purpose and regulatory guidance at 43 C.F.R. § 8223 that govern the management of RNAs on BLM lands, and whether Almadex has obtained any state permits required for such operations.

### **Extraordinary Biological Significance of the Peloncillo Mountains**

The Peloncillo Mountains of Hidalgo County, New Mexico, occupy a singular position in North American biogeography. As part of the Madrean Sky Island Archipelago—formally recognized by Conservation International as a Global Biodiversity Hotspot—the Peloncillos function as a critical ecological bridge connecting the Sierra Madre Occidental of Mexico with the Rocky Mountains to the north. Within this transition zone, the Chihuahuan Desert, Sonoran Desert, Great Plains, Great Basin, and subtropical montane ecosystems converge, creating extraordinary species richness and ecological complexity.<sup>6</sup>

More species of reptiles and amphibians have been recorded in the Peloncillos than in any other single mountain range in New Mexico—at least 89 species, representing roughly 72 percent of the state's total herpetofaunal diversity.<sup>7</sup> Hidalgo County also supports approximately 91 mammal species, an extraordinary level of mammalian diversity and more than the much-larger and internationally renowned Yellowstone National Park.<sup>8</sup>

Within this already exceptional landscape, Antelope Pass stands out as an area of national scientific importance. The area has been documented as harboring the highest lizard diversity of any comparably sized area in the continental United States.<sup>9</sup> This is precisely why the BLM designated the Antelope Pass RNA.

### **Antelope Pass Research Natural Area**

The Antelope Pass RNA encompasses approximately 8,710 acres and was designated specifically to protect its extraordinary biological and research values, especially exceptional lizard diversity and habitat for Dixon's whiptail.<sup>10</sup> The 1993 Mimbres RMP, which is the governing land use plan for this part of the Las Cruces District, states a singular management goal for the

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<sup>6</sup> Bodner et al., *Natural Heritage of the Peloncillo Mountain Range* (2005), p. 5

<sup>7</sup> Bodner et al., *Natural Heritage of the Peloncillo Mountain Range*, p. 6

<sup>8</sup> Bodner et al., *Natural Heritage of the Peloncillo Mountain Range*, p. 140

<sup>9</sup> Bodner et al., *Natural Heritage of the Peloncillo Mountain Range*, p. 82

<sup>10</sup> "Dixon's whiptail" is the common name for the Gray checkered whiptail (*Aspidoscelis dixonii*). See <https://animalia.bio/gray-checked-whiptail>.

Antelope Pass RNA: to “[M]anage to protect biological and research values, especially lizard diversity and Dixon’s whiptail habitat.”<sup>11</sup>

The same RMP identifies the RNA as an area with special management protections and prohibits mineral material sales and fluid mineral leasing within the RNA. While the plan does not explicitly prohibit hardrock mining or locatable mineral exploration, such activities would clearly be inconsistent with the goals of the RNA.

The Mimbres RMP also designates portions of the Antelope Pass RNA as “[c]lose[d] to vehicle use north of the El Paso Natural Gas ROW road and west of the road connecting Hidalgo county roads C065 and C079,” with a limitation of “vehicle use to designated roads and trails in the remainder of the area.”<sup>12</sup>

Further, under 43 C.F.R. § 8223.1(b), “No person shall use, occupy, construct, or maintain facilities in a manner inconsistent with the purpose of the research natural area.” Research Natural Areas exist for the primary purpose of research, education, and protection of unusual ecological values—not industrial development. Because Antelope Pass was designated specifically to protect biodiversity and sensitive habitat, mining exploration involving road construction, drilling, trenching, lighting, generators, vegetation clearing, and increased human disturbance is fundamentally inconsistent with both the purpose of the RNA and the BLM’s governing regulations.

The BLM has already determined that Antelope Pass warrants special protection. Permitting locatable mineral exploration or mining within or adjacent to the RNA would directly undermine the purpose of that designation.

### **Wildlife Corridor Connectivity**

The Antelope Pass area, particularly its location where the Peloncillo Mountains traverse NM Highway 9, is a critical component of the Peloncillo Mountains wildlife habitat linkage, identified in the Sky Islands Wildlands Network conservation plan (SIWN-2000).<sup>13</sup> This habitat connection, linked with several other similar conservation plans stretching north from the Peloncillos to the Brooks Range in Alaska, forms the overall “Spine of the Continent” conservation plan.<sup>14</sup> Within that plan, the Peloncillos habitat connections are identified as one of the most important habitat linkages in the entire Rocky Mountains range—the only contiguous cross-border wildlife connection with Mexico.

The Peloncillos, an approximately 100-mile-long range in both New Mexico and Arizona, is the primary cross-border habitat connection between the Southern Rocky Mountains to the north and the Sierra Madre Occidental range in Chihuahua and Sonora in Mexico. This corridor supports movement and habitat connectivity for jaguar, Mexican gray wolf, pronghorn antelope, desert bighorn sheep, migratory bats, raptors, and numerous other species dependent on large, intact landscapes.

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<sup>11</sup> *Mimbres Resource Management Plan*, p. 5-55

<sup>12</sup> *ibid.*

<sup>13</sup> Wildlands Project, et al., *Sky Islands Wildlands Network Conservation Plan* (2000)

<sup>14</sup> Hannibal, *Spine of the Continent: The Most Ambitious Wildlife Conservation Project Ever Undertaken* (2012)

Further, Steins Pass (I-10 Peloncillo Mountains–Steins), located approximately 25 miles north of Antelope Pass along the Peloncillo range, has been identified in the New Mexico Wildlife Corridors Action Plan as one of the ten highest-priority wildlife corridors in the state, specifically to restore habitat connectivity across Interstate 10 for desert bighorn sheep.<sup>15</sup> Antelope Pass is a critical wildlife corridor in the southern Peloncillo range, preserving—at least for now—a natural, wild north-south migration pathway bordered by areas developed for agriculture and human habitation around the towns of Rodeo to the west and Animas to the east. Mineral exploration or mining operations at Antelope Pass—including exploratory drilling, road construction, off-road vehicle use in closed or restricted areas, and associated surface disturbance—would severely, if not completely, undermine the very wildlife movement this corridor was prioritized to protect.

### **Special-Status Species**

The Antelope Pass area also supports rare and special-status species including the Mexican-long nosed bat (*Leptonycteris nivalis*), which is listed as Endangered under the federal Endangered Species Act, the Dixon's whiptail and night-blooming cereus (*Peniocereus greggii*), both listed as Endangered by the State of New Mexico and designated as BLM Sensitive species, among others. Surface disturbance, habitat fragmentation, increased traffic, drilling noise, night lighting, and groundwater impacts would significantly affect these species and their habitat.

Of particular significance is the presence at Antelope Pass of the Dixon's whiptail lizard (*Aspidoscelis dixonii*). Peer-reviewed scientific research published by the American Museum of Natural History identifies Antelope Pass—specifically the area centered approximately 10.5 kilometers west of Animas in Hidalgo County—as the only known location of this particular genetically distinct clone of *A. dixonii* in the United States, and possibly on Earth.<sup>16</sup>

Dixon's whiptail is a diploid unisexual species that reproduces by parthenogenetic cloning—a reproductive strategy of considerable scientific value in research bearing on genetics, developmental biology, and evolutionary theory. Its extreme rarity and restriction to a single small locality make any ground disturbance in the Antelope Pass area a potential extinction-level event for this population. The BLM must treat the presence of this species as a non-negotiable constraint on any surface-disturbing activity that may adversely affect this species or its habitat in the project vicinity.

The federally Endangered Mexican long-nosed bat also has documented roost sites within the Peloncillo, Animas, and Big Hatchet mountains, all within the Las Cruces District.<sup>17</sup> The New Mexico Bootheel is one of only two areas in the United States that the U.S. Fish & Wildlife Service identifies as part of the range of the Mexican long-nosed bat (the other being the Big Bend area of Texas).<sup>18</sup>

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<sup>15</sup> Cramer et al., *New Mexico Wildlife Corridors Action Plan* (2022), p. ES-11

<sup>16</sup> Cole et al., *Hybridization between the endangered unisexual gray-checked whiptail lizard (*Aspidoscelis dixonii*) and the bisexual western whiptail lizard (*Aspidoscelis tigris*) in southwestern New Mexico; American Museum novitates*, no. 3555

<sup>17</sup> <https://www.fws.gov/species/mexican-long-nosed-bat-leptonycteris-nivalis>

<sup>18</sup> *ibid.*

Night-blooming cereus (*Peniocereus greggii*), a fragrant cactus whose flowers bloom only one night each year, has been documented by a local volunteer, trained in the identification of that plant, in the Antelope Pass area. This preliminary survey conducted by the volunteer found approximately 40 plants in just one small portion of the Antelope Pass RNA, indicating that the plant may be present in high-concentration across the entire RNA. Natural Heritage New Mexico states that “[m]any populations have been extirpated from New Mexico” and that “this is a vanishing plant throughout its range.”<sup>19</sup> Today, this rare plant is only found in four counties in New Mexico (including Hidalgo), one county in Texas, and nowhere else in the United States. Presumably, given the likely high-concentration of night-blooming cereus within the RNA and its relative rarity elsewhere, any exploratory activity within the RNA that would consist of clearing vegetation and other impacts to habitat that could be catastrophic to this state-protected plant.

While night-blooming cereus is known to be present in the Antelope Pass area, the exact extent of the population in that area is not fully documented. Therefore, it is paramount that a proper survey be conducted prior to any exploration activity, and that all attempts are made to mitigate impact to this species and its habitat. Even casual use operations can damage or destroy night-blooming cereus, and as part of its investigation of activities Almadex has conducted and is planning to conduct at Antelope Pass, the BLM should ensure that Almadex does nothing that disturbs this state-protected and BLM Sensitive species.

The BLM should ensure that any casual use operations undertaken by Almadex do not disturb or damage the protected species present at Antelope Pass (because *any* disturbance to protected species would be greater than the “no or negligible disturbance” allowed for casual use), and that, if Almadex submits a Notice for more extensive ground-disturbing exploration activities, that the BLM ask Almadex to revise such Notice to ensure that its proposed Notice-based operations prevent unnecessary or undue degradation to the protected species and other values in the Antelope Pass area and comply with the Mimbres RMP and performance standards in the BLM regulations at 43 C.F.R. §§ 3809.313(b), 3809.320, and 3809.420.

## **Water Resources and Soils**

Mining exploration as well as associated equipment and/or vehicle use present serious risks to fragile desert soils, ephemeral drainage systems, springs, and groundwater resources in an already water-limited landscape.

Ground disturbing exploratory activities could create long-term impacts through erosion, sedimentation, contamination from fuel or chemical spills, and impacts to hydrologic processes.

Given the remoteness and ecological sensitivity of the Antelope Pass area, even relatively small disturbances could have outsized cumulative effects. These impacts must be evaluated comprehensively.

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<sup>19</sup> <https://nmrareplants.unm.edu/node/45>

## **Cultural Resources**

The Antelope Pass area is known to community members to contain significant cultural and archaeological resources, including pictographs, bedrock mortars, agave roasting pits, and other prehistoric sites. Further, these sites may have areas of importance to Tribal communities. Surface disturbance and extractive activities create risks of irreversible damage to cultural resources that may not yet be fully documented.

## **Recreation, Tourism, Astronomical Research, and Local Economy**

The Peloncillo Mountains and Antelope Pass area support a diverse and growing recreation and tourism economy built on wildlife viewing, birding, hunting, hiking, and dark sky tourism, all of which depend on the region's remote, undeveloped character and exceptional natural conditions. This is not simply a scenic benefit—it is a functioning and regionally significant economic driver rooted in conservation-based recreation and tourism based on compatible land use.

Southwestern Hidalgo County contains some of the darkest night skies in the continental United States, classified as Bortle 1, the highest designation for natural darkness and one of the best possible conditions for astronomical observation anywhere in the world.<sup>20</sup> Based on input from a local astronomer and business owner, approximately 130 active astronomers have chosen to locate in this region specifically because of these exceptionally rare dark sky conditions.

In addition, three of the most successful remote astronomical telescope hosting sites in the United States are located in this area, collectively supporting more than 250 telescopes owned by astronomers from eleven different nations across three continents, as well as telescope owners from 43 U.S. states. These astronomers and associated businesses pay local property taxes, state taxes, create long-term jobs, support local schools, churches, grocery stores, medical facilities, and other essential community institutions. They also attract astro-tourists to the region, many of whom travel here specifically to experience the Milky Way and some of the last truly dark skies remaining in North America, and support meaningful contributions to the advance of the astronomical sciences.

Commercial and industrial lighting associated with mining exploration or development—including drill pads, generators, access roads, equipment yards, nighttime operations, and future mine infrastructure—would create significant light pollution and “skyglow,” the artificial illumination of the night sky caused by light emitted upward or reflected from the ground and then scattered by dust and atmospheric particles, resulting in a luminous haze or light dome that permanently degrades dark sky visibility.

Such degradation would not only disrupt wildlife behavior and habitat quality, but would threaten the continued viability of the region's astronomy-based economy and associated research activities. If dark sky conditions are materially compromised, astronomers and telescope-hosting businesses may need to cease operations, undermining an established and sustainable economic sector built on preservation rather than extraction.

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<sup>20</sup> <https://darkskynewmexico.com/>

Similarly, dust, noise, increased road traffic, habitat fragmentation, and visual disturbance would diminish recreation values and weaken the broader local economy tied to conservation, outdoor recreation, and rural quality of life. These are not secondary concerns—they directly affect livelihoods, community identity, and the long-term economic resilience of Hidalgo County.

### **Requested Actions**

Because of the scale of claims, the sensitivity of the landscape, the presence of special-status species, the direct conflict with the Antelope Pass RNA, and the importance of this area to the local economy, any proposed exploration activity warrants the highest level of scrutiny.

We strongly urge the BLM not to treat this as a routine exploration proposal. The cumulative scope of 132 claims, combined with Almadex's publicly stated intent to advance the project and indications that IP geophysical exploration may already be underway, demonstrates a continuing and expanding mineral development program rather than isolated prospecting.

Accordingly, we respectfully request that the BLM:

- Investigate and evaluate any casual use operations, including induced polarization (IP) geophysical surveys or other mechanized exploration, Almadex has taken or plans to take at Antelope Pass to ensure its activities do not exceed the limits for casual use under BLM regulations, including ensuring no motorized vehicle use in the areas of Antelope Pass RNA that are closed or limited for vehicle use, and that any casual-use disturbance has been and will be reclaimed.
- Provide early public notice, public review, and opportunity for formal public comment on any mineral exploration or mining proposal associated with these claims.
- Ensure that no exploration or mining activity occurs within the Antelope Pass RNA or in a manner inconsistent with its protective purpose under federal regulation and the Mimbres RMP, or without a Notice that ensures against unnecessary or undue degradation, or an approved Plan of Operations.
- Conduct full biological surveys and compliance review for both federally listed and New Mexico state-listed species, including formal ESA Section 7 consultation where required and full evaluation of impacts to species protected under the New Mexico Wildlife Conservation Act and the New Mexico Endangered Plant Species Act.
- Conduct complete cultural resource review and Tribal consultation under the National Historic Preservation Act.
- Evaluate all direct, indirect, and cumulative impacts through a full NEPA process, including consideration of an Environmental Impact Statement, if Almadex submits a proposed Plan of Operations.
- Conduct claim validity review.
- Please advise us of the results of any investigation of Almadex's casual use activities and if and when Almadex submits a Notice or proposed Plan of Operations, so that we may obtain copies of those documents.

## **Conclusion**

Antelope Pass is not an ordinary landscape. It is one of the most biologically significant places in the Southwest, a critical wildlife corridor of continental importance, and a landscape the BLM itself has already recognized as deserving special protection through the designation of the Antelope Pass Research Natural Area.

This is precisely the kind of place where precaution, transparency, and long-term stewardship must prevail over short-term profits from mineral development by an international mining company.

We appreciate the BLM's responsibility in reviewing these claims and respectfully urge the agency to ensure that any decision fully reflects the extraordinary scientific, ecological, cultural, and community values at stake.

Thank you for your time and consideration.

Sincerely,

Luke Koenig, Gila Grassroots Organizer  
New Mexico Wild

Dirk Sigler, President  
Chiricahua Regional Council

Allyson Siwik, Executive Director  
Gila Resources Information Project

Emily Burns, Northern Sky Islands Director  
Sky Island Alliance

JJ Apodaca, Ph.D., Executive Director  
Amphibian and Reptile Conservancy

Channing Moore, Executive Director  
Malpai Borderlands Group

Jon Holtzman, State Council Chair  
New Mexico DarkSky

Megan "Turtle" Southern, Director  
The Rewilding Institute

Myles Traphagen, Borderlands Program Coordinator  
Wildlands Network

Donna Stevens, President  
Gila Native Plant Society

Sylvan Kaufman, Conservation Committee Co-Chair  
Native Plant Society of New Mexico

Patrice Mutchnick, Board Chair  
Heart of the Gila

Nico Lorenzen, Interim Executive Director  
Wild Arizona

John Cornell, President  
Dona Ana County Associated Sportsmen

Stephen M. Hensley, Founder  
Dark Sky New Mexico

Diana Alicia Casas  
Animas Valley Women Business Owner Association

Geoff Bender, Southwestern Research Station Director  
American Museum of Natural History

Bob Ashley, Owner  
Chiricahua Desert Museum and Geronimo Event Center in Rodeo, NM

Carol Simon, Biologist  
Portal, Arizona resident

Peter Waser, Professor of Biological Sciences (Emeritus), Purdue University  
Portal, Arizona resident

Dr. Paul Hirt, Professor Emeritus, Arizona State University  
Portal, Arizona resident