

Exhibit 70



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COU# 2012-3303

JM

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To: Joe Martens <joemartens@gw.dec.state.ny.us>
Date: 6/6/2012 7:08 AM
Subject: NYCO Project
Attachments: Why Lot 8 Not Oak Hill.pdf

Good morning, Joe -- Good to talk to you Monday.

To answer the question on whether the the Oak Hill site is alternative to NYCO's proposal for Lot 8, I attach a document that NYCO's Peter Goodwin shared recently with Rob Davies.

While Oak Hill is theoretically an alternative, NYCO does not believe it is a feasible alternative. Oak Hill is expected to yield far fewer reserves than Lot 8 and yet it has significantly more overburden that must be removed first. As a result, Oak Hill would require more infrastructure and the visual impact of mining would be far greater than for Lot 8. The significant infrastructure investment would put NYCO at a competitive disadvantage and likely require the company to shift more of its operation to its Mexico facility. The impact at Lot 8 would be far less and allowing its use would bring an additional 2,000 acres to the Forest Preserve.

We've been in touch with Teresa Sayward's office and my understanding is that the meeting with DEC, NYCO representatives and the Adirondack organizations will take place Thursday. From an overall environmental perspective, the Lot 8 proposal is the more beneficial approach. The economic benefits are also significant. On Tuesday, the North Country Regional Economic Development Council voted to support the constitutional amendment.

This is an Adirondack issue where a consensus among the environmental and economic groups would be cheered by almost everyone. NYCO is looking forward to the opportunity to work with the environmental community to build that consensus.

Best regards,

Mark

February 24, 2012

Why Lot 8 not Oak Hill?

- The acquisition of Lot 8 provides additional reserves for extending the life of the operation and employment in the region.
- The ore at Lot 8 is higher quality allowing NYCO to maintain market competitiveness.
- There will be significantly fewer acres affected due to existing infrastructure from the adjacent mine and therefore less ecological changes to the land's original integrity.
- The State will acquire additional wilderness land from NYCO as part of the acquisition which increases its land resources for growth and sustainability in the Adirondack Park.
- Mining at Oak Hill will negatively impact aggregate producers to reopen dormant quarries at higher costs.
- There will be less visual impacts for residents and visitors.



The Benefits of the Acquisition of Lot 8



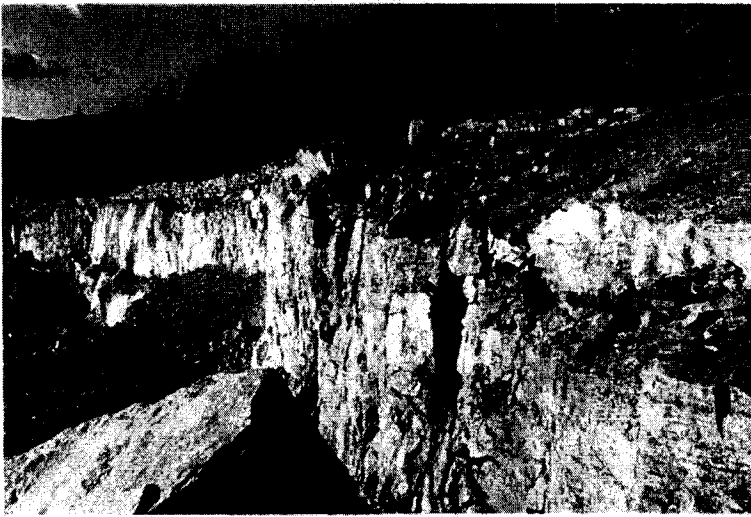
- Mining costs are (3x) less expensive than Oak Hill.
- Extends the tax life of the mine at a higher valuation benefiting the Town of Lewis and the Elizabethtown-Lewis School Districts.
- Longer mine life equates to longer tax life and revenues for the state and local municipalities.
- The quality of ore at a reasonable strip ratio will keep NYCO competitive in the world market.
- Longer mine life equates to longer tax life and revenues for the state and local municipalities.

Schematic Drawing of Lot 8 (Property lines are approximate)



- The schematic drawing outlines the location of Lot 8 in relation to the Lewis Mine in Essex County, New York.
- Approximately 50 acres marked in (Pink) represents the potential mining operation required in Lot 8 but is dependent on core drilling evaluations.
- Upon a successful acquisition, NYCO's property to the right of Lot 8 and from the pink line to the right, as well as Lot 8 would be donated to the state at the closure of the mining operation.

The Lewis Mine and Lot 8



The Lewis Mine is located in the Town of Lewis, Essex County, New York. NYCO has been mining at this location since 1981. The mine is an open pit and encompasses approximately 260 acres with less than a third actually affected by the operation with the balance being buffer land. Based on existing sales and ore yield, there are estimated reserves for 3-4 years. **As part of a successful acquisition, all land currently part of the Lewis Mine and Lot 8 would be donated to New York State at the conclusion of the mining operation.**

NYCO's alternative plan is to mine at Oak Hill, a deposit located North East of the Lewis Mine. The negative factors associated with this site are higher mining costs to extract the ore and limited reserves compared to other world suppliers. Without the acquisition of Lot 8, NYCO is facing higher production costs in an already competitive environment. This ultimately leads to reduced profitability for NYCO and lower revenues for New York State.

Lot 8 is owned by New York State and borders the west side of NYCO's Lewis Mine property. NYCO has not been able to core drill on the property but utilizing existing and historical data from the Lewis Mine estimates that there is a potential 1.2 million tons of reserves available allowing for additional 8-10 years of operation and continuation of economic benefits for both parties.

With existing infrastructure from the Lewis Mine, NYCO could minimize the amount of areas needing to be affected and offer reduced mining costs than starting after the Lewis Mine is closed. This time period is approaching and affects how mine and business plans will be implemented.

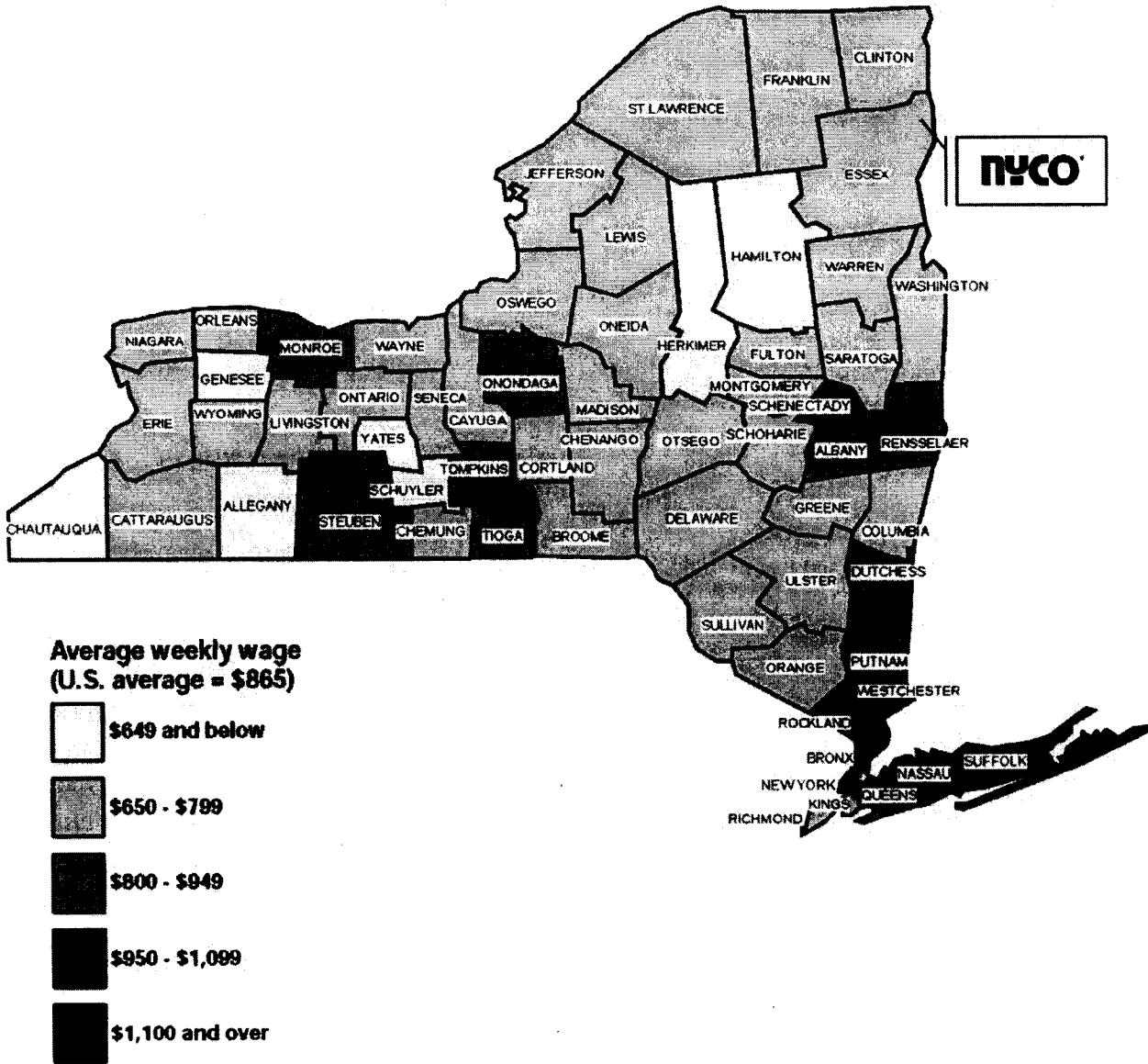
Community Stewardship

Over its 50 years of operation, NYCO places high emphasis on its social responsibility and improving the quality of the community and the well being of the people's lives. NYCO's contributions vary in both monetary and material donations.

Notable projects include the following:

- Donation of cap rock for bank stabilization projects affected by excessive flooding.
- Donation of by-product from the plant for community projects.
- Supported Cornell University and The Town of Willsboro's waste water treatment facility to utilize the by-product to filter phosphorous from waste water to offer economic savings to the town with environmental improvements.
- Scholarship programs for employee children and support of athletic and art programs.
- Donations to United Way, Food Bureaus, Red Cross both local and international chapters, hospice and other non-profit organizations. Some of these programs also involve donations made by employees of NYCO.
- NYCO donates to over 100 organizations in the North Country on an annual basis.

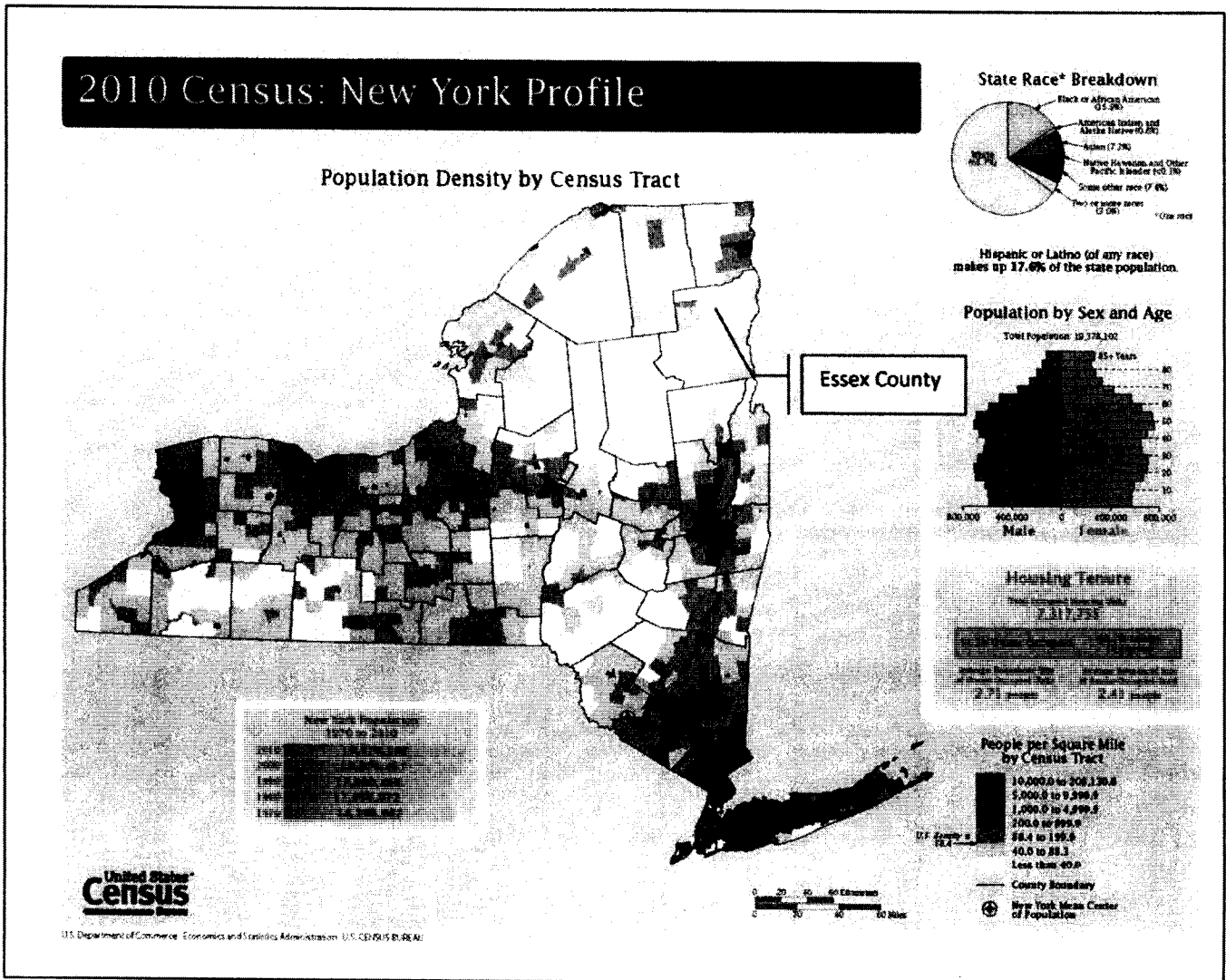
Average Weekly Wages by County in New York State (Second Quarter 2010)



Source: Bureau of Labor Statistics, February 2011

- NYCO total labor income is \$6.0 million making the company one of the largest employers in Essex County and the North Country.
- NYCO Minerals is the largest employer in Willsboro with 102 employees.
- NYCO's average salary is \$53,000 which is 53% higher than the median salary reported by the Bureau of Labor Statistics for Essex County.

Population Density by U.S. Census Tract



- The population density in Northern New York is much smaller than other regions of New York.
- The majority of Essex County is less than 40 people per square mile.

Economic Impacts

This component of the report highlights economic data prepared by Colin Read, Ph.D., Professor of Economics at the State University of Plattsburgh, New York. The principle analytic tool used to generate the data is IMPLAN 3.0 for economic impact analysis of NYCO's operations in the region. Dr. Read's complete study is provided as Appendix A of this report.

Extracts from Dr. Colin Read's Report:

"I find that the NYCO wollastonite facility creates direct, indirect and induced labor income of \$6,070,648 and 147 jobs in Essex County alone. This represents 0.78% of the county-wide labor force and 1.14% of county-wide labor income. The Value-Added to Essex County is \$19,806,879, while the operation contributes 0.8 percentage points to the employment rate in Essex County. Alternatively, in the absence of the NYCO operation, the average unemployment rate would rise from 9.5% to 10.3%".

"The employment supported by NYCO has a substantial effect on Essex County housing. The rise of employment induces an increase of \$22,730,677 million in county housing value. Assuming an average mill rate of 2.5% in Essex County and its towns, this increased housing value associated with the NYCO operations generates approximately \$568,267 in property tax revenues to Essex County and its towns. The operation also generates \$2,670,463 million in state and local tax revenue and \$2,372,365 million in federal tax revenue each year".

Business Review

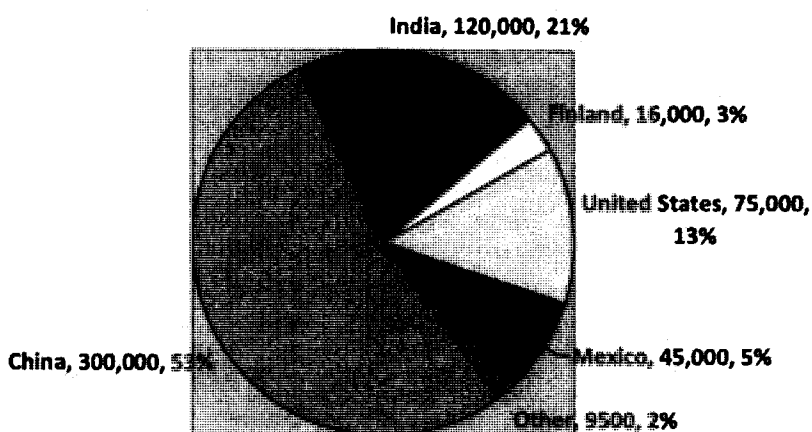
Reserves

The life of any mining company is driven by the quality and quantity of reserves supplied to its customer base. In the mining world, "long-term" reserves are defined in 50 years or greater. The minimum acceptance for reserves to a mining company is 40 years. NYCO's current reserves at the Lewis Mine will be depleted in 3-4 years. With the addition of Lot 8 reserves, NYCO estimates that its operations could be extended by 8-10 years without a new development program, providing economic benefits to NYCO, the employees, local residents and New York State.

Competition

NYCO is facing intense competition from other wollastonite producers. China is now the largest producer followed by India. There is a second producer in Northern New York and one primary manufacturer in Europe. NYCO also competes with several companies in Europe, Japan and South America who purchase raw ore from China to mill into finished product for resale. In addition to wollastonite, NYCO competes with other minerals including talc, clay, calcium carbonate and mica.

Major Wollastonite Producers By Region (Estimated Production in 2010)



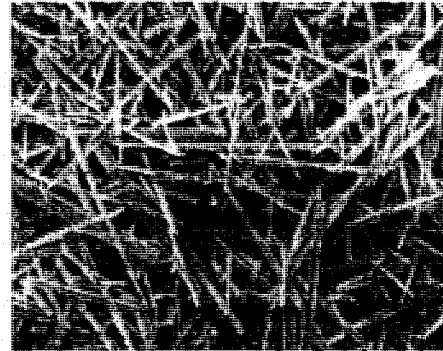
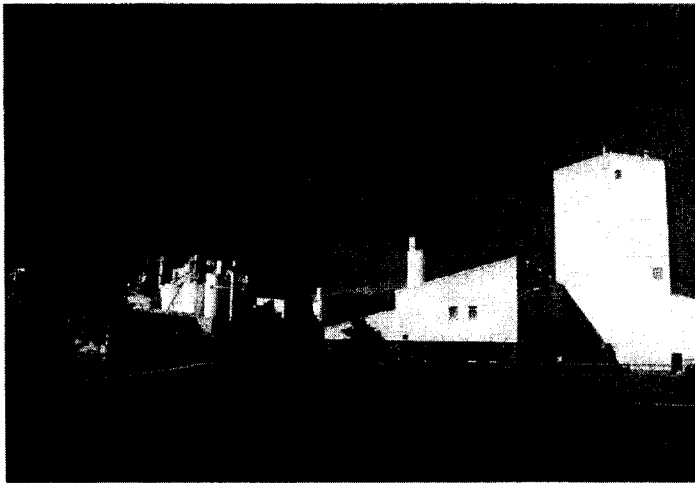
Logistics

NYCO exports approximately 40% of finished product globally. Logistics are a major cost component that impacts the company's ability to be competitive in the marketplace due to the location of the operations to the global marketplace. With rising oil prices and heightened security requirements, transportation costs have dramatically increased over time. While NYCO negotiates an annual contract with an ocean carrier based on volume, the freight is higher than producers face in China and India due to the import and export differentials.

Rising Costs

The costs associated with the production of wollastonite have increased 50% over the past 10 years. The core factors driving higher costs are **government regulations and energy**. Although manufacturing costs have increased in other parts of the world, they are not at the same levels as the United States. **China and India have significant lower production costs due to inexpensive labor, less environment controls and more lenient government regulations.**

History of NYCO



SEM of High Aspect Ratio Wollastonite

Since the early 1950's, NYCO Minerals has been producing and supplying an industrial mineral called wollastonite. Also known as calcium metasilicate, wollastonite is a white, non-metallic mineral with a needle-like structure that improves the strength and quality of automotive and consumer plastics, coatings, adhesives, sealants, brake components, construction materials, ceramics, mold fluxes and many other applications.

The history of NYCO dates back to 1953 when The Godfrey L. Cabot Co. of Boston, Massachusetts purchased the mineral rights from the Willsboro Mining Company. The initial 20,000 ton per year production facility produced products for the ceramic and refractory industries. The company remained with Cabot until 1969 when Interpace Corporation of Parsippany, New Jersey bought the company to utilize wollastonite as an additive for their dinnerware and ceramic tile businesses.

By the mid 1970's, wollastonite's non-hazardous characteristics and high melting point were recognized as a key ingredient in the replacement of asbestos especially for fire resistant construction board and friction materials. These new applications doubled the demand for wollastonite while driving the company's name and brand recognition into the international marketplace. In 1977, NYCO further ventured into new markets and purchased the chemical modification technology which is applied to the surface of the wollastonite substrate to allow improved mechanical properties especially in as plastics parts were becoming more prevalent in automobiles to make them lighter for improved fuel efficiency. The chemically modified wollastonite was also found to be a key additive in industrial and marine coatings to extend traditional corrosion inhibitor pigments.

In 1979, Interpace sold the company to a division of Canadian Pacific who renamed the company NYCO Minerals Inc. The growing demand for higher performance led further plant expansions and the commissioning of a separate facility strictly focused on the production of chemical modified wollastonite products. From 1950 to the 1990's, plant capacity reached 120,000 tons per year.

Fording Coal, the division of Canadian Pacific that managed NYCO, purchased a wollastonite deposit in Hermosillo, Sonora, Mexico. In 1997, a plant was commissioned with capacity to produce over 200,000 metric tons per year of wollastonite making it the world's largest wollastonite production facility. The business was managed by Fording Coal in the early 90's until it was sold in June of 2007 to Resource Capital Funds, a private equity firm based in Denver, Colorado. RCF specializes in acquisitions of mining operations throughout the world.

Introduction

The acquisition of Lot 8 for NYCO Minerals is crucial for extending the life of the operation in New York State. It allows the extension of reserves a crucial asset to a mining company and ability to extract those reserves at lower costs to maintain market competitiveness and employment in the North Country.

This report summarizes the financial impacts NYCO's operations have on the local and state economy and the negative impacts that are probable without the acquisition of Lot 8.

- NYCO's Willsboro Operation creates direct, indirect and induced labor income of \$6,070,648 and 147 jobs in Essex County.
- The value-added to Essex County is over \$19 million.
- Employment supported by NYCO induces \$22.7 million in county housing value.
- NYCO generates \$2,670,463 in state and local tax revenue and 2,372,365 million in federal tax revenue annually.
- \$568,267 is currently generated in property tax revenues to Essex County and its towns.

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Today

Wollastonite... One Mineral, A World of Applications

Acquisition of Lot 8 An Economic Benefit to New York State and NYCO Minerals, Inc.

2011

