

Ennis, David, EMNRD

From: Pinson, Pam D. <ppinson@fmi.com>
Sent: Monday, June 11, 2018 11:53 AM
To: Ennis, David, EMNRD; Shepherd, Holland, EMNRD; Mercer, David, NMENV
Cc: Voss, Alicia; Lloyd-Mills, Rita; Shelley, Thomas L.
Subject: Lucky Bill Canyon Groundhog No. 5 Stockpile, MMD Permit GR009RE
Attachments: 20060417-003.pdf

DJ,

Freeport-McMoRan Chino Mines Company (Chino) requests to amend the Chino Mines Closure Closeout Plan Revision application submitted to the Mining and Minerals Division (MD) and the New Mexico Environmental Department (NMED) on February 16, 2018 to address the reclamation schedule of Groundhog No.5 Stockpile. Modification 14-1 to MMD Permit GR009RE, requires completion of the Groundhog No. 5 Stockpile reclamation by June 30, 2018. Chino requests to change the Groundhog No. 5 reclamation completion date from June 30, 2018 to Dec 31, 2024.

This extension request is necessary for Chino to sequence the Mining and Minerals Division (MMD) reclamation process with the Chino Administrative Order on Consent (AOC) based on dual regulatory activities as documented in the attached letter dated April 6, 2006 from the NMED to the MMD. These include:

1. the appropriateness of conducting interim reclamation activities prior to determination of a final reclamation plan under the AOC administered by NMED;
2. the effectiveness of the proposed reclamation, as described in *Groundhog No. 5 Stockpile Construction Quality Assurance and Reclamation Completion Plan*, in addressing potential impact to ground water and surface water; and
3. additionally, in 2014 Chino implemented the *Groundhog No. 5 Stockpile Work Plan for Additional Characterization and Controls for the HWC IU* to address inadequate seepage capture for sampling at the toe of the stockpile. Chino continues to collect samples from the new engineered seepage collection system and has submitted a Groundhog No. 5 Stockpile geochemical evaluation interim report on March 5, 2018 to NMED.

Chino anticipates that a Record of Decision (ROD) for Hanover/Whitewater Creek Investigation Unit under the AOC will be finalized by 2023. The NMED recommends that the MMD extension of the reclamation deadline coincide with final remediation requirements of the ROD.

Chino appreciates MMD amending the CCP to reflect the proposed change in the Lucky Bill Canyon Groundhog No. 5 Stockpile site reclamation schedule. Please

contact me at (575) 912-5213 or Rita Lloyd-Mills at (575) 912-5778 with any questions concerning this requested amendment.

Pam Pinson

Senior Environment Engineer

Chino Mines Company

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