

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

Fernando Martinez, Director
Mining and Minerals Division



June 18, 2018

Mr. Thomas L. Shelley, Manager
Freeport-McMoRan Chino Mines Company
P.O. Box 10
Bayard, NM 88023

RE: Technical Comments on Application, Revision 18-1 for the 2018 Updated Closure/Closeout Plan, Chino Mine, Grant County, New Mexico, Permit No. GR009RE

Dear Mr. Shelley:

The Mining and Minerals Division ("MMD") received a permit application from Freeport-McMoRan Chino Mines Company ("Chino") on February 16, 2018 to revise permit number GR009RE for the Chino Mine, Grant County, New Mexico. The application is an update to the Chino Mine Closure/Closeout Plan ("CCP"). The permit application fee was also received by MMD. MMD is processing this application as Revision 18-1. Chino presented the Updated CCP in a meeting on May 10, 2018, in Santa Fe, NM to the agencies and Gila Resources Information Project ("GRIP").

In accordance with 19.10.5.506.E NMAC, MMD provided the application for Revision 18-1 to, and requested comments from, the New Mexico Environment Department, New Mexico Office of the State Engineer, Bureau of Land Management, New Mexico Department of Game and Fish, New Mexico Historic Preservation Division and New Mexico Forestry. Technical comments from these agencies are included with this letter and shall be addressed in writing, along with the following technical comments from MMD:

1. Section 3.1.2, Page 10 states "Chino has dedicated the upper lifts of the STS2 and Upper South stockpiles for storage of RCM [Reclamation Cover Material] for future reclamation." Please provide a map/figure delineating the RCM portion(s) of the STS2 stockpile. Also, please report the base elevation of RCM stored in the STS2 Stockpile.
2. Page 27 reports 20.6 million yd³ of RCM in the north mine area. Please provide a table with the estimated volume of RCM stored within the STS2 Stockpile, Upper South Stockpile and Whitehouse Stockpile versus the total volume of RCM required for the reclamation of the north mine area. Chino should also provide an anticipated reject percentage from the existing RCM volumes.
3. Figure 021 identifies Rubio Peak Conglomerate, Rubio Peak Flows, Sugarlump Tuff, Bear Springs Basalt and Kneeling Nun Tuff as either potential cover borrow areas or riprap areas. Please note that for the CCP and financial assurance cost estimate, only Kneeling Nun

Tuff and approved RCM material from the Upper South Stockpile, STS2 Stockpile and Whitehouse Stockpile shall be considered for reclamation. Material from the Rubio Peak Formation is currently being tested by Chino on a test plot and was conditionally approved by MMD for the North Lampbright Waste Rock Stockpile under Revision 16-1. However, the Rubio Peak Formation material is not approved for wider use at Chino on facilities such as Main Lampbright, South Lampbright, or Southwest Lampbright as currently proposed in the CCP. The haul routes depicted in Figure 021 should be modified accordingly for the cost estimate.

4. Page 34-35, Section 5.1.3. The CCP indicates that Chino will update the MMD waiver during or after MMD review. Page 34 states that due to mining, "portions of the open pit lie outside the geographic area defined when the conditional waiver was granted in 2003." Please propose adjustments to the 2003 MMD waiver to become consistent with the 2018 Updated CCP. This might best be provided in one comprehensive figure showing:

- the waiver area pursuant to Mining Act Rules
- the area of open pit hydraulic containment (AOPHC)
- the open pit surface drainage area (OPSDA).

5. Access to the mine maintenance facilities area (which is proposed for an industrial PMLU) is currently provided via the road located between the South and West Stockpiles. At closure, these stockpiles coalesce as shown in Figure 5-1 and Appendix A Figure 003. Please describe how access to the mine maintenance facilities area will be provided at closure in order to facilitate the proposed industrial PMLU for this area.

6. Please define the anticipated slope direction(s) and grade of the top surface of the STS2 Stockpile at closure (see Figure 004 in Appendix A).

7. Figure 022 in Appendix A - "Typical reclaimed outslope section" shows a toe collection feature. Please provide a typical design detail for the toe collection feature. Will toe channels require riprap? What is the approximate width and what storm event will the toe channels be designed to meet? Further, Chino should define areas in the Appendix A reclamation drawings where the toe channel will/will not be constructed for water conveyance since this will likely affect the cost estimate for construction.

8. Section 6.1.5.2 describes the use of 18-24 inches of cover over footings, slabs, pavement, etc. located on non-acid generating materials while Section 6.1.6 describes the use of 36 inches of cover material over similar facilities. Please clarify.

9. Figure 027 should show the approximate aerial extent of the proposed HDPE geomembrane for the outlet channel at the NE corner of Tailing Pond 7. Additionally, please provide justification for two feet of cover over the HDPE geomembrane (see Figure 029) instead of three feet of cover proposed for the remainder of the impoundment.

10. Chino states on page 28, Section 3.3.8 and page 67 (earthwork material take-off summary table), that borrow material volume in borrow areas E, F and H is approximately 4 million yd³, while the earthwork take-off summary indicates a need for 9.77 million yd³ for the 2,019 acres yet to be reclaimed. Chino should clarify the volumetric discrepancy and indicate an anticipated reject percentage based on previous SMA reclamation using Gila Conglomerate. Additionally, Figure 030 shows borrow areas E and H located NW of Tailing Pond 7. These

borrow areas could be affected by Chino's tentative plans to construct a new tailing pond in this area in the future. If/when a tailing impoundment is proposed, new borrow areas may need to be identified at that time.

11. Table 5-2 provides a summary of buildings and structures to be removed/reclaimed. Please provide a map/figure identifying the buildings listed in Table 5-2.

12. MMD notes that some plans continue to have alternatives (e.g., sources of cover material and sludge disposal, salt disposal and water treatment facility, etc.), and evaluation of alternatives as part of the CCP evaluation process as well as the implementation of a reclamation plan. In order to provide a cost estimate, the Chino CCP must select one option in the 2018 plan even if alternative location(s) or options are mentioned in the Chino CCP.

13. Page 28 states that Chino plans on updating the material handling plan to include additional RCM in the near future. MMD agrees that the following two material handling plans should be updated by Chino and will be a condition within Revision 18-1:

- *Materials Handling Plan South Pit Area*, dated July 7, 2006. This plan should be updated to describe waste and ore handling for all areas of the Chino pit(s) being actively mined or planned for active mining in the future. Updates to the pit material handling plan should be on the same approximate 5-year schedule as updates to the CCP.
- *Quality Control – Standard Operating Procedure, Cover Material Handling Plan and Placement, West Stockpile Test Plots*, dated March 16, 2007. This plan should be updated to describe RCM handling and placement procedures on the same approximate 5-year schedule as updates to the CCP.

14. Page 33, Section 5.1.1.; Page 8, Section 3.1.2 & Table 3-1; and Page 67, Earthwork Takeoff Summary. The estimated stockpile acreage is somewhat contradictory. The CCP indicates 2,340 acres, 2,565 (less 222 acres of Upper South and STS2) acres and 2,718 acres of stockpiles to be reclaimed. Chino should clarify what is the best estimate for the total acreage for stockpiles surfaces to be reclaimed for EOY2018 estimate.

15. Figure 8-1 PMLU designation at mine site. Chino should clarify whether its design includes the boundaries between unreclaimed (waived) and reclaimed for PMLU of wildlife habitat. For example, will these locations include some combination of berms, fencing, drainage ditch, rock armor or other design elements?

16. Please describe the methods to be used at closure to protect wildlife during the short-term and long-term water treatment periods.

17. Appendix C. Section 4.2.4 Maintenance, Page 13. Chino references 2013 Tyrone CCP Update estimate of 1.5 to 1.0% for routine maintenance and capital replacement costs. Chino should provide additional detail of what items and frequency of capital replacement costs would encompass.

Re: Technical Comments on Application, Revision 18-1 for the 2018 Updated Closure/Closeout Plan, Chino Mine, Grant County, New Mexico, Permit No. GR009RE

June 18, 2018

Page 4

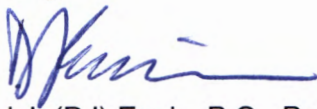
18. Appendix C Water Treatment, Page 8, Section 2.3; Page 10, Section 3.2; and Table 6 of Attachment A – ETS memo. Chino proposes sludge and salt disposal associated with water treatment. In order to more accurately assess capital costs for the financial assurance proposal, Chino should provide some additional detail with the understanding that some aspects may change at the actual time of construction:

- proposed location of water treatment facilities
- proposed location of SDF & dimensions of lined pond
- proposed location of salt disposal facility & dimension of lined pond, and
- provide map(s) that show specific locations for treatment and disposal.

Please provide written responses to these technical comments, as well as the attached technical comments from the cooperating agencies, within 60-days of receipt of this letter.

If you have any questions, please feel free to contact me at (505) 476-3434 or by email at david.ennis@state.nm.us.

Sincerely,



David J. (DJ) Ennis, P.G., Permit Lead
Senior Reclamation Specialist
Mining and Minerals Division

Attachments: Cooperating Agency Technical Comments

cc: Mine File (GR009RE)
Holland Shepherd, Program Manager, MARP
Brad Reid, Permit Lead, NMED



Susana Martinez
Governor

STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

BATAAN MEMORIAL BUILDING
407 GALISTEO STREET, SUITE 236
SANTA FE, NEW MEXICO 87501
PHONE (505) 827-6320 FAX (505) 827-6338



March 12, 2018

David J. Ennis, P.G.
Permit Lead
Mining Act Reclamation Program
Mining and Minerals Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Site Wide Closure/Closeout permit Update 2018, Revision 18-1, Chino Mine Grant County, New Mexico, GR0096RE (HPD log 107454)

Dear Mr. Ennis:

This letter is in response to the updated closeout plan for the Chino Mine received at the Historic Preservation Division (HPD) on March 8, 2018.

The HPD has no comments on the updated close out plan.

Please do not hesitate to contact me if you have any questions regarding these comments. I can be reached by telephone at (505) 827-4064 or by email at bob.estes@state.nm.us
Sincerely,

A handwritten signature in blue ink that reads "Bob Estes".

Bob Estes Ph.D.
HPD staff Archaeologist
Log: 107454/107455

Thomas Shelley
Environmental Sustainability Development
Freeport McMoran Chino Mines Company
P.O. Box 10
Bayard, NM 88023

Ennis, David, EMNRD

From: Roth, Daniela, EMNRD
Sent: Monday, March 26, 2018 3:50 PM
To: Ennis, David, EMNRD
Subject: RE: Request for comments, Sitewide Closure/Closeout Plan Update 2018 (GR009RE)

Dear David Ennis:

Thank you for giving me the opportunity to review and comment on the Sitewide Closure/Closeout Plan Update 2018, Revision 18-1, for the Chino Mine in Grant County, NM (Permit Tracking No. GR009RE). I do not anticipate any impacts to state listed endangered plants from the updated closeout plan.

Please let me know if I can be of further help.

Sincerely,

Daniela Roth

Botany Program Coordinator
EMNRD – Forestry Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3347

<http://www.emnrd.state.nm.us/SFD/>



NEW MEXICO
ENVIRONMENT DEPARTMENT



SUSANA MARTINEZ
Governor

Ground Water Quality Bureau
1190 South St. Francis Drive (87505)
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Cabinet Secretary

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J.C. BORREGO
Deputy Secretary

MEMORANDUM

Date: May 1, 2018

To: Holland Shepherd, Program Manager, Mining Act Reclamation Program

Through: Jeff Lewellin, Mining Act Team Leader, Mining Environmental Compliance Section

From: Brad Reid, Mining Environmental Compliance Section
John Moeny, Surface Water Quality Bureau
Neal Butt, Air Quality Bureau

Subject: **NMED Comments, Sitewide Closure/Closeout Plan Update 2018, Freeport-McMoRan Chino Mines Company, Chino Mine, Grant County, GR009RE, Revision 18-1**

The New Mexico Environment Department (NMED) received correspondence from the Mining and Minerals Division (MMD) on March 6, 2018 requesting NMED review and provide comments on the above-referenced MMD permitting action. In accordance with 19.10.5.505.B(3) and 19.10.5.506.E NMAC, NMED is providing comments within the 60-day period prescribed by the regulation. NMED has the following comments.

Background

Freeport-McMoRan Chino Mines Company (“Chino”) provided and updated Closure/Closeout Plan (“CCP”) to NMED and MMD on February 15, 2018. The updated CCP revises the scope of work for closure/closeout of the Chino Mine under the New Mexico Water Quality Act, the Copper Mine Rule and the New Mexico Mining Act. The plan incorporates specific design criteria set forth in the existing NMED Discharge Permit 1340 (DP-1340) and MMD Permit No. GR009RE. NMED has the following comments.

Air Quality Bureau

The Air Quality Bureau comments are attached under separate letterhead.

Surface Water Quality Bureau

The Surface Water Quality Bureau comments are attached under separate letterhead.

Mining Environmental Compliance Section (MECS)

The updated CCP was submitted to MECS as part of the discharge permit renewal and modification application for the Supplemental Discharge Permit for Closure (DP-1340) dated August 28, 2007 and supplemented with the updated CCP on February 15, 2018. Technical review of the CCP pursuant to the Water Quality Act (WQA) and the Water Quality Control Commission (WQCC) Regulations, including the Copper Mine Rule (20.6.7 NMAC), is currently underway. MECS will have additional comments based on technical review of the CCP. As such, comments will be submitted under separate letterhead directly to Freeport-McMoRan Chino Mines Company with copy to MMD to ensure technical completeness of the CCP which is critical to development of the draft Ground Water Discharge Permit. MECS will coordinate response to these documents with MMD prior to issuance of a comment letter to Freeport-McMoRan Chino Mines Company.

NMED Summary Comment

NMED is withholding issuance of the determination pending completion of technical review of the application and CCP associated with DP-1340 and the Copper Mine Rule.

If you have any questions, please contact Jeff Lewellin at (505) 827-1049.

cc: Bruce Yurdin, Division Director, NMED-WPD
Shelly Lemon, Bureau Chief, SWQB
Liz Bisbey-Kuehn, Bureau Chief, AQB
Fernando Martinez, Division Director, EMNRD-MMD
DJ Ennis, Lead Staff, EMNRD-MMD
Kurt Vollbrecht, Program Manager, MECS



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BUTCH TONGATE
Cabinet Secretary
JUAN CARLOS BORREGO
Deputy Cabinet Secretary

MEMORANDUM

DATE: March 21, 2018

TO: Jeff Lewellin, Mining Act Team Leader
Mining Environmental Compliance Section, Ground Water Quality Bureau

FROM: Neal Butt, Environmental Analyst
Air Quality Bureau

RE: Request for Comments, Site-Wide Closure/Closeout Plan Update 2018, Freeport-McMoRan Chino Mines Company, Chino Mine, Grant County, MMD Permit No. GR009RE, Revision 18-1

The New Mexico Air Quality Bureau (AQB) has completed its review of the above-mentioned mining project. Pursuant to the New Mexico Mining Act Rules, the AQB has the following comments:

Air Quality Permitting History

Freeport-McMoRan Chino Mines Company (Chino) holds a Title V Operating Permit #P066R2 and a revised NSR Permit # 0298-M8 that was issued on July 12, 2016. To ensure compliance with state and federal air regulations, the permit includes conditions that limit the emissions, hours of operation, production rate, and conditions that will require record keeping and reporting to the Department.

Details

The purpose of the 2018 Updated Closure / Closeout Plan (CCP) is to present a comprehensive reclamation plan for Chino that is consistent with all applicable federal and state regulatory requirements and permit conditions so that a financial assurance cost estimate can be calculated to meet the financial assurance requirements of 19.10.12 NMAC.

Recommendation

The AQB has no objection to the current request for permit modification.

The applicant is expected to comply with all requirements of federal and state laws pertaining to air quality. This written evaluation does not supersede the applicability of any forthcoming state or federal regulations.

If you have any questions, please contact me at (505) 476-4317.



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NEW MEXICO ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

MEMORANDUM

TO: Jeff Lewellin, Mining Act Team Leader
Mining Environmental Compliance Section
Ground Water Quality Bureau (GWQB)

FROM: John Moeny, Surface Water Quality Bureau

SUBJECT: **Request for Comments, Site Wide Closure/Closeout Plan Update 2018,
Freeport-McMoRan Chino Mines Company, Chino Mine, Grant County,
MMD Permit No. GR009RE, Revision 18-1**

DATE: April 18, 2018

On March 6, NMED received a request for comments regarding the revised Closure/Closeout Plan for the Chino Mine, located in Grant County and operated by the Freeport-McMoRan Chino Mines Company.

Summary of Proposed Action

The site wide closure/closeout plan (CCP) is an update to previous plans submitted by Freeport-McMoRan for the Chino Mine. CCP updates are a requirement under permit no. GR009RE and New Mexico Mining Act rules. This plan updates the 2007 CCP and incorporates new reclamation requirements established in December 2013 with the adoption of the Copper Rule (NMAC 20.6.7) by the New Mexico Water Quality Control Commission.

Closure-Closeout Plan Comments

Perennial and intermittent waters within Smelter Tailing Soils Investigation Unit ("STSIU") lands at the Chino mines company, are listed under 20.6.4.808 NMAC, and include, but are not limited to, the mainstem of Lampbright Draw, beginning at the confluence of Lampbright Draw with Rustler Canyon, all tributaries that originate west of Lampbright Draw, and all tributaries of Whitewater Creek that originate east of Whitewater Creek from Bayard Canyon to U.S. 180. Waters under 20.6.4.808 NMAC have designated uses of warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

Ephemeral waters within STSIU lands at the Chino mines company are listed under 20.6.4.809 NMAC, and are limited to Chino mines property subwatershed drainages A, B, C, D, and E, but exclude the tributary containing Ash spring, reaches containing Bolton spring, the Chiricahua Leopard Frog critical habitat transect and all reaches in subwatershed C that are upstream of the critical habitat, and the tributary in drainage D1 that contains Brown spring. Ephemeral waters under 20.6.4.809 NMAC have designated uses of limited aquatic life, livestock watering, wildlife habitat and secondary contact.

Intermittent water quality standards under 20.6.4.98 NMAC apply to all other unclassified waters of the state, not described above, until a hydrology protocol (HP) survey is conducted and a Use Attainability Analysis (UAA) is approved by the Water Quality Control Commission (WQCC) in accordance with 20.6.4.15 NMAC. This would include portions of Whitewater Creek, Lampbright Draw and Hanover Creek discussed in Surface Water Hydrology section (sec 3.3.4, page 20).

NPDES Permits NM0020435, NMR00A101, NMR00A106, and NMR00A107 listed in table 2-1 are terminated or expired. Freeport-McMoRan Chino Mine is currently covered under 2015 Multi-Sector General Permit (MSGP) Tracking Number NMR053259 for Sector G2 Metal Mining and J2 Mineral Mining and Dressing. The Stormwater Pollution Prevention Plan (SWPPP) for this facility must be updated to incorporate this change in design, operations, or maintenance at the facility. Reclamation and closure activities are considered “active mining activities” under the MSGP and monitoring and inspections as required by this permit must continue until the Notice of Termination requirements have been met. In addition to the general and sector specific requirements, permittees should ensure they incorporate Section 9.6.2.2 of the MSGP Permit which describes additional New Mexico specific requirements for inspections and stabilization.

The SWQB finds that the updated CCP will achieve compliance with relevant water quality regulations if implemented as described and operations adhere to permit conditions, the New Mexico Water Quality Act, and Copper Rule.

GOVERNOR
Susana Martinez



DIRECTOR AND SECRETARY
TO THE COMMISSION
Alexandra Sandoval

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Donald L. Jaramillo

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Roswell
THOMAS "DICK" SALOPEK
Las Cruces

4 May 2018

David J. (DJ) Ennis P.G.
Permit Lead, Mining Act Reclamation Program
Mining and Minerals Division (MMD)
1220 South St. Francis Drive
Santa Fe, NM 87505

**RE: Site Wide Closure/Closeout Plan Update 2018, Revision 18-1, Chino Mine, GR009RE;
NMDGF No. 18343.**

Dear Mr. Ennis,

The New Mexico Department of Game and Fish (Department) has reviewed the Chino Mine 2018 Updated Closure/Closeout Plan (CCP) submitted by Freeport-McMoRan Chino Mines Company (FMI), and provides the following comments.

Page 44, Section 6.1.3.2 states that a 6-foot high continuous chain link security fence will be constructed around the perimeter of the Santa Rita open pit. The Department believes that wildlife should be excluded from accessing potentially harmful pit lake water. In order to effectively exclude deer and elk, fencing should have a minimum height of 8 feet and be constructed of corrosion-resistant chain link or woven or welded wire mesh. The bottom portion of the fence should include a barrier of durable and corrosion-resistant material that would extend to a minimum of two feet in height for excluding small mammals and other terrestrial species. In addition, the fence should be secured at the ground and buried to prevent animals from digging underneath. The Department is available for consultation regarding specific sizes and containment types of exclusion options.

Other potentially toxic tanks, ponds, and reservoirs that will be present post-closure should be similarly fenced to exclude wildlife. The CCP does not indicate what measures will be in place to deter migratory birds from landing in areas containing contaminated water that may be hazardous to wildlife. Chino Mine currently has a program that addresses avian protection, and the Department strongly recommends that avian protection measures continue post-mining.

Page 46, Section 6.1.4.1 states that power poles may be left in place as bird habitat, in support of the post-mining land use designation as wildlife habitat. The Department believes that there are abundant perching locations in the project vicinity and that all unused power poles should be removed, especially those in proximity to the Santa Rita pit area.

Page 49, Section 6.1.7 states that although reclamation of borrow areas are not subject to the rules and regulations listed in the New Mexico Mining Act, including the post-mining land use

criteria, FMI has voluntarily proposed a reclamation plan for all mine borrow sites. The Department strongly supports and appreciates FMI's commitment to reclaim all borrow areas as part of the CCP.

For the reclamation seed mix, the Department recommends using a native seed mix that is certified weed-free, and requesting seed test results from the vendor to avoid inadvertently introducing exotic species to the reclamation sites. Any alternate seeds used to substitute for primary species that are unavailable at the time of reclamation should also be native. Table 8-1 lists white sweet clover (*Melilotus alba*), which is not native to the area, as an alternate species for reclamation. The Department recommends that American vetch (*Vicia americana*) be substituted for white sweet clover as a suitable alternate native seed. When possible, the Department recommends using seeds that are sourced from the same region and habitat type as the reclamation site.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, please contact Ron Kellermueller, Mining and Energy Habitat Specialist, at (505) 476-8159 or ronald.kellermueller@state.nm.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Wunder". The signature is fluid and cursive, with a large initial "M" and "W".

Matt Wunder, Ph.D.
Chief, Ecological and Environmental Planning Division

cc: USFWS NMES Field Office