



Freeport-McMoRan Chino Mines Company
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December 22, 2025

Certified Mail # 70221670000184290526

Mr. Kevin Barnes
Energy, Minerals and Natural Resources Department (EMNRD)
Mining and Minerals Division (MMD)
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Mr. Barnes:

Re: Response to Request for Additional Information, Revision 24-2, 2024 CCP Update, Chino Mine, Permit No. GR009RE

Freeport-McMoRan Chino Mines Company (Chino) submitted an update to the Chino Closure- Closeout Plan on October 30, 2024. On October 28, 2025, Chino received comments from the New Mexico Mining and Mineral Division and other state agencies. This letter provides responses to these combined comments. Below are the agency comments in italics followed by Chino's responses.

New Mexico Mining and Minerals Division (MMD)

1. Design limit change driven by Kessel Stockpile and Rubio Peak RCM Stockpile

Kessel Stockpile:

- *Given that the final build-out of the Kessel Stockpile overlaps both the Main and Southwest Lampbright stockpiles, please provide the separate acreages of the Kessel Stockpile at maximum height that will be subject to Existing Unit standards under 19.10.5.507 NMAC and subject to New Unit standards under 19.10.5.508 NMAC and a map that illustrates these areas.*
- *Please provide technical details of the five-year (EOY 2030) and maximum height closure plans.*

Chino's response:

As previously discussed, Chino proposes that the entire Kessel Stockpile be subject to new unit standards. A separate closure plan for the ultimate Kessel configuration was provided to MMD on a letter dated November 4, 2025. The full buildout elevation and acreage are 7100 ft and 806 acres, respectively. Technical details for the five-year (EOY 2030) plan are included on sheets 6 and 8 in Appendix C and described in section 6.1.1 of the current CCP.

Rubio Peak RCM Stockpile:

- *Please confirm if the extent of the Rubio Peak Reclamation Cover Material borrow area is still as shown on Figure 2 of 2020 Lampbright Rubio Peak Test Plot (As-Built Report) with a total area of 192 acres. If the planned borrow extent has changed, please provide the new acreage, a map showing the extent, and clarify if any portions of the borrow area extend beyond the planned extent of the Kessel Stockpile or the proposed Design Limit expansion shown on Figure 13.*

- Please provide the volumetric calculations supporting the available cover material volume shown in Table 2 of Appendix E of 4,901,076 cubic yards. Please provide the base elevation of the stockpile after excavation of cover material in the stated 49-acre stockpile extent and maximum constructed height.

- Based on the proximity of the Continental and Hanover Mountain Mine's (Permit No. GR002RE), there are aspects of the GR002RE closure plan that may require RCM from Chino to reclaim. Please clarify if FMI has plans to utilize RCM stockpiled at Chino (Rubio Peak, STS2, etc.) for closure at Continental and Hanover Mountain. If this is true, please demonstrate that there is enough RCM volume available.

Chino's response:

The original 192-acre Rubio Peak Reclamation Cover Material borrow area shown in Figure 2 of the 2020 Lampbright Rubio Peak Test Plot (As-Built Report) remains, with additional cover material salvaged from the Kessel Stockpile pad. No portion of the borrow area will extend beyond the proposed design limit expansion shown in Figure 13.

Table 2 of Appendix E has been updated to reflect the 10,953,600 cubic yards of available Rubio Peak RCM. According to the 2016 Rubio Peak Formation Demonstration Plot As-Built Report, approximately 9,300,000 cubic yards of Rubio Peak material are present within the original 192-acre borrow area, calculated using the observed 30-foot formation depth. An additional 1,746,600 cubic yards of Rubio Peak material associated with the Kessel Stockpile pad will be placed in the 49-acre Rubio Peak RCM Stockpile. The base and maximum elevations of this stockpile are approximately 6,125 ft and 6,302 ft, respectively, consistent with the current Kessel Stockpile pad design. The total Rubio Peak material quantity was then reduced by a 1% rejection rate to account for oversized material that resulted in the available volume presented in Table 2.

The Continental and Hanover Mountain Mine 2023 CCP identifies the use of 711,400 cubic yards of RCM from the Upper South Stockpile to support reclamation activities. The updated Table 2 in the Material Handling Plan provides the reclamation cover material balance for the North Mine Area and indicates an excess RCM volume of 13,073,900 cubic yards, including 7,787,900 cubic yards excess sourced from the Upper South Stockpile. Accordingly, sufficient RCM is available to complete reclamation at Continental and Hanover Mountain.

2. Reservoir 9 expansion within permitted 9 stockpile footprint

Please clarify if the expansion of Reservoir 9 as a process water and stormwater holding facility fulfills requirements under the standards for impoundments in 19.10.5.508.B(6) NMAC. Also clarify if the expanded Reservoir 9 will be retained at closure or reclaimed in accordance with 19.10.5.508.B(6)(b) NMAC.

Chino's response:

Reservoir 9 has been an existing mine facility used to store impacted storm water since before the original approved closeout plan and was formed by the construction of a large haul road between the headwaters of a natural drainage and the Santa Rita Open Pit. Chino previously permitted a 159-acre waste rock stockpile to be built in this same footprint when no longer needed to store water and the reservoir will remain within the approved Santa Rita beneficiation design limit. While the MMD Permit is silent regarding the capacity of Reservoir 9, it is currently permitted under NMED Discharge Permit DP-459 to store up to 15 million gallons. Chino has requested a modification to NMED DP-459 to increase the storage capacity of the Reservoir. Water will be pumped from the Santa Rita Open Pit to Reservoir 9 to store that water for future use while Chino mines the bottom of the open pit. This allows Chino to recycle this valuable

resource and reduce the need for future freshwater pumping for its operations. Part of the request to NMED includes lining the footprint of the reservoir with clay material to prevent seepage back into the Santa Rita Open Pit.

Regarding the requirements for impoundments at 19.10.508.B, because the water to be stored is simply moved from the Santa Rita Open Pit, there is no change to the hydrologic balance. The reservoir is located within the Open Pit Surface Drainage Area (OPSDA) and the Area of Open Pit Hydrologic Containment (AOPHC) and therefore, there are no potential adverse impacts to adjoining property. 19.10.5.508B(6) includes performance standards for earthen embankments “not subject to the jurisdiction of the Mine Safety and Health Administration or the State Engineer”. As part of Chino Mines, Reservoir 9 and its large “embankment” has been and will continue to be subject to the Mine Safety and Health Administration and therefore these standards are not applicable.

Chino is also currently permitted to construct the 9 Waste Rock Stockpile over the Reservoir 9 footprint when it is no longer needed to store water. This is currently not projected to occur in the next 5 years and therefore this CCP includes the reservoir surface being reclaimed at closeout on Sheets 3 and 18 of Appendix C. The surface of the reservoir and the haul road fill will be covered and revegetated.

3. Southwest Lampbriht Waste Rock Stockpile Buttress per recent modification

The Southwest Lampbriht Waste Rock Stockpile Buttress will be added to Permit No. GR009RE under permit Modification 24-1 and any changes to financial assurance included in the final reclamation cost estimate for Revision 24-2.

Chino's response:

Chino appreciates the information provided.

4. Additional PMLU of Water Management

For MMD to approve a new PMLU, it must be first stated what activities will be included under the new PMLU. It is MMD's understanding that the following activities will be included as 'Water Management'. Please provide details on any additional activities that will be included under this PMLU designation if not included below:

- *Operation of a Water Treatment Plant in the vicinity of the Ivanhoe Concentrator*
- *In-pit spray evaporation systems staged on flat areas*
- *In-pit sumps for collection of runoff and impacted water*
- *In-pit roads for access to water management areas*
- *Selected surface impoundments for management of runoff and impacted water*
- *Tailing Pond 7 Interceptor system*
- *Tailings pipeline and pipeline corridor*
- *Storage of salt and sludge produced from evaporation and water treatment facilities on top of a portion of the West Stockpile*

West Stockpile:

- Please detail how salt and sludge will be stored on top of the West Stockpile (e.g. construction of landfill cells, a stockpile, evaporation ponds, etc.)

- The area on top of the West Stockpile dedicated to the salt/sludge storage is depicted inconsistently throughout the PAP, with varying extents described on Sheet 18, Figure 11, and Appendix G Figure 2. Please provide a new map detailing the extent of the West Stockpile that will be given the PMLU of Water Management compared to that which will be reclaimed as Wildlife Habitat or any other use.

- Please clarify how the top of the West Stockpile will be graded, how cover will be placed, and how drainage pathways will be designed keeping in mind that transport of stored salt and sludge to either the Santa Rita Pit or the other outcrops should be minimized.

Chino's response:

Water Management PMLU

The proposed water management PMLU is adjusted to include the following:

- Operation of a Water Treatment Plant in the vicinity of the Ivanhoe Concentrator
- Tailing Pond 7 Interceptor System
- Tailings Reclaim water pipeline and pipeline corridor
- Lampbright Area Interceptor Well
- West stockpile interceptor well system
- Tanks at each collection point and interconnected pipelines
- Ivanhoe Concentrator Tank
- 750,000-gallon tank
- Roads to connect each collection point

Areas within conditional waiver areas approved in 2003 and within current open pit limit are removed. This is illustrated in the revised Figure 11 of the Main CCP.

Conceptual Salt Disposal Area

The proposed salt disposal area is a conceptual design for financial assurance purposes. The CCP is not a final design; this facility could be moved to other sites if they offer better final design features at closure. The top of the West Stockpile was only a placeholder that would yield a representative financial assurance calculation. Salt could be located anywhere in which the salts can be managed and covered (not reclaimed but covered to prevent erosion and salt dissolution) about once per year.

Telesto calculated that the volume of salt generated could be stored within the area of the West Stockpile shown on Appendix G Figure 2; however, this may not be the best location considering surrounding reclamation, potential run-on issues and the need to avoid impacts to slopes and the Waiver area toward the Santa Rita Open Pit. Since the West Stockpile location generated the above final design-level questions, Chino proposes relocating the salt disposal facility for this conceptual design to the top surface of the North In-Pit Leach Stockpile and North Waste Rock Stockpile. A conceptual design of this facility is provided in revised Appendix C Sheet 11 and Figure 2 of Appendix G.

5. Pit safety: rely on the Water Management PMLU for the pit and utilize existing berms, active monitoring, and restricted/controlled access

Please clarify if this plan for Pit Safety would diverge from what is listed in Revision 18-1 Section 9.H.2 and clarify what is meant by 'rely on the Water Management PMLU for the pit'.

Chino's response:

The pit safety plan continues to comply with the intent of protecting public safety in the referenced permit section. However, Chino requests that this section be updated/clarified as part of this permit revision.

For example, the referenced revision language allows berms and/or chain link fences around a pit for safety purposes. Chino maintains a berm between the pit and adjacent access roads that meets the requirement described in the referenced section of the permit. However, for portions of the pit without access roads— such as where pit highwalls intersect steep terrain- it is neither safe nor practical to construct or maintain a berm. Therefore, it is not accurate to state that the entire circumference of the pit would have a berm. We recommend revising the language to state that areas accessed by workers will have a berm.

Chino no longer proposes/supports the inclusion of a 6-foot chain link fence around the open pit. The perimeter fence and signage surrounding the entire mine is an appropriate measure to restrict, warn and control public access, not a fence at the edge of the pit. Public should not be near the open pit or accessing stockpiles and infrastructure.

The site will be staffed with operations and maintenance personnel and will be actively monitored and controlled. Combined with perimeter fencing and signage, these measures ensure these areas are not accessed by the public. The phrase cited in MMD's comment ("rely on water management PMLU") was intended to convey that the site would be actively managed, which is part of an effective control of ensuring public safety.

The paragraph below is for clarity and additional details for page 48 of the CCP, Section 11:

"Pit safety will be managed through active site monitoring, restricted access, and existing perimeter controls. Berms will be maintained in areas where workers or equipment have access, such as along adjacent roads, consistent with permit requirements. In locations where pit highwalls intersect steep terrain and no access roads exist, constructing berms is neither safe nor practical. The site will remain staffed and actively monitored, and perimeter fencing with signage will restrict public access. These measures collectively ensure compliance with the intent of protecting public safety."

6. Rubio Peak materials changed from a conditional to an approved RCM

Based on the positive results from the Rubio Peak test plots, MMD supports the approval of Rubio Peak materials as an RCM for Chino.

Chino's response:

Chino appreciates the approval of this reclamation cover material.

7. OPSDA and AOPHC updates pending groundwater model update/completion in 2025

- MMD has no comment.

8. Pit Waiver modified to accommodate Water Management PMLU and encompass all highwalls and stockpile slopes within the OPSDA

- MMD does not recommend the modification of the Pit Waiver to include the PMLU of Water Management within the Pit Perimeter. MMD considers language similar to Revision 18-1 Section 9.H and an associated water management plan (e.g. Appendix G) to be sufficient to cover any in-pit water management activities.

- For the top surface areas of Waste Units mentioned in the original Pit Waiver to be reclaimed as Wildlife Habitat that are outside the Pit Perimeter, this language can be adjusted to include the Water Management PMLU. However, FMI will need to specifically delineate what portions of these top surfaces will be used for water management.

- MMD does not support the inclusion of all highwalls and stockpile outslopes within the OPSDA as part of the Waiver area exempted from a PMLU or establishment of an SSE, except those already waived in the 2003 Conditional Approval of Waiver Request. To be considered for a Pit or Waste Unit Waiver, 19.10.5.507.B NMAC states in part:

“The Operator must show that achieving a post-mining land use or self-sustaining ecosystem is not technically or economically feasible or is environmentally unsound.”

A portion of a stockpile or waste unit, outslope or otherwise, being located within the OPSDA is not by itself a demonstration that reclamation of this area is not technically or economically feasible or environmentally unsound. A demonstration of these three factors will be required for any Waste Unit or portion thereof outside the Pit Perimeter where FMI desires to waive PMLU or SSE requirements.

Chino's response:

Chino agrees that the Pit and Stockpile waivers should not be modified to include the Water Management PMLU. Figure 11 of the Main CCP and Sheet 9 of Appendix C were revised to remove the Water Management PMLU from within the pit and stockpile waiver areas.

The Pit waiver area has been slightly expanded to include the current limits of the Santa Rita Open Pit highwalls (see attached drawing titled NMA Pit Boundary/Waiver). For comparison, the original 2003 open pit waiver area is also shown in this figure. This drawing also shows the original stockpile waiver areas and the current stockpile slope waiver areas proposed for the West, South and Upper South Stockpiles based on the projected 2030 post-closeout Open Pit Surface Drainage Area (OPSDA).

The Upper South Stockpile proposed waiver area is similar to that approved for the 2018 CCP update. Overall, the open pit waiver area has increased by approximately 45 acres compared to the 2003 approved waiver area (1,900 acres). Chino is relying on the same waiver justifications as provided in 2003 which are still relevant. The stockpile slope waiver areas have changed due to stockpile height and changes resulting from the implementation of the OPSDA in the Copper Rule.

Appendix E: Material Handling Plan 2024 Update “MHP”

1. FMI: In the CCP update, Chino proposes utilizing flat areas in the pit for long-term water management in a proposed water management post-mining land use (PMLU). These flat areas are ideal for staging equipment and providing a safe operating area for the evaporation systems.

- MMD:

As above, MMD does not recommend the modification of the Pit Waiver to include the PMLU of Water Management within the Pit Perimeter. MMD considers language similar to Revision 18-1 Section 9.H and an associated water management plan (e.g. Appendix G) to be sufficient to cover any in-pit water management activities.

Chino's response:

Chino appreciates the recommendation and concurs with MMD.

2. Chino request that the definition of reclamation cover material (RCM) in GR009RE be modified as follows:

"For the North Mine Area, RCM is defined as "pre-mining salvaged soils, overburden from un-mineralized Tertiary volcanic rocks and igneous rock, Paleozoic sedimentary rocks (E.g. Colorado Formation), and intrusive dikes and sills sourced from native materials, or temporary stockpiles, and directly placed or stored in the Upper South Stockpile, STS2, or Rubio Peak stockpile. When placed, RCM will meet the water holding capacity defined in 10.6.7.33.F(2) NMAC, and have a particle size distribution as shown in Table 5 (Textural Guidelines – Chino NMA) of Chinos's Material Handling Plan.

For the South Mine Area, RCM is defined as "in-situ material sourced from the Gila Group/Formation/Conglomerate, piedmont alluvial materials, and Datil Group materials as depicted in Figure 3-9: Geologic Map of the South Mine Area of the CCP Update dated February 14, 2018. "

- Based on the proposed approval of Rubio Peak materials as an accepted RCM, MMD has no opposition to this modification of the RCM definition.

Chino's response:

Chino appreciates the modification to the RCM definition.

3. The CCP update shows a new RCM stockpile to store Rubio Peak RCM, which Chino will salvage as it constructs the Kessel Stockpile

- Please provide details for the following questions:

- *What is the anticipated volume of material that will be stored in the Rubio Peak RCM stockpile?*
- *What stockpiles are proposed to be covered with Rubio Peak RCM at closure?*
- *Is the Rubio Peak stockpiled volume sufficient to reclaim those stockpiles or will additional excavation of in-situ Rubio Peak material be needed?*

- *The RCM requirements of the Kessel Stockpile are not contemplated in the 2021 MHP. Please detail the amount of RCM required to reclaim both the 5-year build-out and the ultimate build-out of the Kessel and where this material will be sourced from. Also, provide an overall calculation of the total RCM needs to reclaim the Chino North Mine Area.*

Chino's response:

Per the updated Table 2 in the Material Handling Plan, the anticipated volume of material stored in the Rubio Peak RCM Stockpile is approximately 1,746,600 cubic yards. This material is expected to support reclamation of both the 5-year and ultimate Kessel build-out configurations, which require 1,176,100 cubic yards and 3,910,700 cubic yards of RCM, respectively. Because the stockpiled volume alone is not

sufficient to fully reclaim the Kessel area, additional in-situ Rubio Peak material will be used to complete reclamation of the remaining Kessel and Lampbriht stockpiles. Table 1 of the Material Handling Plan has been updated to incorporate Kessel and presents the total RCM volume required to reclaim the Chino North Mine Area. As described above and in Table 2 of Appendix E, it is estimated that there is 10,953,600 cubic yards of total Rubio Peak material available. According to the 2016 Rubio Peak Formation Demonstration Plot As-Built Report, approximately 9,300,000 cubic yards of Rubio Peak material are present within the original 192-acre borrow area, calculated using the observed 30-foot formation depth. An additional 1,746,600 cubic yards of Rubio Peak material associated with the Kessel Stockpile pad will be placed in the 49-acre Rubio Peak RCM Stockpile. The total Rubio Peak material quantity was then reduced by a 1% rejection rate to account for oversized material that resulted in the available volume presented in Table 2.

4. Chino's primary rationalization for reducing the frequency of confirmation samples is based on the strong correlation showing that samples with percent sulfur below 0.15% consistently have pH above 5.

Chino's second rationalization is displayed by Figure 1, which provides a comparison of three sample populations for percent sulfur less than or equal to 0.15%:

- The points on the graph represent the non-parametric cumulative distribution function

for:

- o Data: original percent sulfur data with values less than or equal to 0.15%*
- o 10%: Randomly sampling 10% of the original sulfur data with values less than or equal to 0.15%*
- o 25%: Randomly sampling 25% of the original sulfur data with values less than or equal to 0.15%*

Also shown in Figure 1 are comparisons between parametric statistics assuming a normal distribution. Both the 10% and 25% sampling reproduce parametric statistics close to the data's parametric statistics. Also, there is very little difference in the parametric statistics between the 10% and 25% random sampling populations. Thus, reducing the sampling frequency from 1-in-4 to 1-in-10 will have little effect on testing to verify that the relationship between pH and percent sulfur holds.

- MMD does not necessarily oppose the reduction in paste pH sampling for in-pit RCM. However, the provided Figure 1 does not sufficiently demonstrate that a reduction in sampling will allow Chino to continue to adequately characterize in-pit RCM with pH <5.0.

- Please provide a demonstration of the "strong correlation showing that samples with percent sulfur below 0.15% consistently have pH above 5". Such demonstration should include the original lab data the analysis is based upon.

- Please provide additional analysis similar to Figure 1 comparing limited sampling populations that is based on the original paste pH sampling data connected to the percentage sulfur populations shown in Figure 1 (or a separate sampling data set) and provide the original sampling data.

Chino's response:

Chino prepared the attached calculation set to further demonstrate the statistical basis for the proposed reduction in sampling frequency. Data used in the analysis is included in the excel sheet titled MHP Statistical Analysis Data. Given the volume of data, Chino will distribute the file electronically via email.

The Material Handling Plan (MHP) relies on percent sulfur to identify material suitable for use as potential Reclamation Cover Material (RCM). Specifically, material with sulfur content less than 0.15 percent is

initially classified as suitable. A subset of this material is then analyzed for paste pH to verify compliance with paste pH acceptance criteria.

When a sub-set of a larger sample population results in the same population representation (i.e., cumulative distribution function and parametric variables like median), then the sub-set is representative of the larger sample population. The intent of Figure 1 is to show that the sub-set of the sample population adequately represents the entire population. Ergo, a reduction in sampling frequency adequately identifies the percent sulfur in the overall sample set.

The corollary to this statement is that the samples with percent sulfur above 0.15% result in pH values lower than 5. Thus, removing the data for which there is high certainty that it will not be RCM ensures that the sample data set analyzed is more representative of RCM. Thus, the cutoff is not critical in itself but rather serves as a screening threshold to define the population evaluated in the analysis.

See Golder's 2006 Material Handling Plan South Pit Area report for the original data and relationship that all samples of RCM with % S below 0.15% have paste pH's above 5. These are the data presented in Figure 5.

The percent sulfur data shown in Figure 1 of our response was based upon all of Chino's available blasthole data, and identified which materials would be classified as RCM (i.e., all with sulfur contents below 0.15%). The original data comparing paste pH to percent sulfur shows that paste pH will always be above 5 (Figure 5). Thus, Chino used the percent sulfur as a surrogate for paste pH to estimate effects of reducing the sampling frequency because there is more data available. Figure 6 shows the exercise in population estimates based on a log-normal distribution.

5. Figure 5 in the MHP describes a step "staking and release of material" that denotes to where Chino will haul blasted materials. For the rhyolite that has an inconsistently large fraction, Chino's geologists will stake this material for releases to riprap or waste rock stockpiles rather than RCM stockpiles. This step eliminates the need for accounting for excessively large quantities of boulders in the RCM.

- MMD supports the segregation of oversize rock fractions from in-pit RCM to be placed in riprap or waste rock stockpiles. Please state what size materials will be segregated if differing from the mentioned ">3 feet diameter".

Chino's response:

Chino clarifies that they will segregate >3 feet-diameter rock fragments prior to placing new RCM material in RCM stockpiles.

6. Chino's understanding of the 2022 MMD Soil Guidelines is that they are "not meant to be interpreted as requirements or rules, but guidelines that will give the operator an option to incorporate best management practices into soil management and evaluate soil conditions if vegetative requirements are not being met." Chino and the MMD initiated a rigorous process for testing and approving potential RCM, all of which use the maximum percent of large particles (i.e. minimum percentage of sand, silts and clays) described in the MHP. To date, all approved RCM at Chino produce and sustain vegetation and are projected to meet the requirements of a self-sustaining ecosystem upon closure.

- While MMD did not promulgate the 2022 MMD Soil Guidelines as strict rules for operators to follow, it still contains MMD preferred characteristics for potential RCM. MMD maintains that any new material proposed for use as RCM at Chino that deviates from the recommended guidelines in the 2022 Soil Guidelines shall be required to follow a similarly rigorous characterization and testing process, whether or not it meets the textural guidelines listed in Figure 5 or Figure 6 in the 2021 MHP.

Chino's response:

Chino acknowledges MMD's preferred characteristics but will continue to rely on the textural criteria in Tables 5 and 6, which reflect the properties of locally available reclamation cover materials. Chino will continue to submit any proposed future RCM that does not meet the 2022 MMD Soil Guidelines to MMD's rigorous characterization and testing process.

Additional comments on MHP:

1. *MMD is aware that the Upper South stockpile contains both RCM and unsuitable waste rock material. Please clarify if the RCM balance shown in Table 2 accounts for the portion of Upper South that could be unsuitable as RCM and provide an updated reasonable estimate of available Upper South RCM material. MMD requests that FMI provide a dedicated material handling plan for all RCM stockpiles at the Mine in addition to in-pit materials.*

Chino's response:

The RCM balance in Table 2 incorporates the portion of the Upper South material identified as unsuitable for use as RCM in Golder's 2006 Supplemental Materials Characterization for the Upper South Stockpile. An additional 7% rejection rate is applied to account for chemical exclusion and oversized material. Of this, 2% reflects anticipated rejection due to historic plating of haul roads constructed with sulfate-bearing materials. This assumes that a 6-inch layer of plated material over each 30-foot lift will require removal.

Chino proposes to provide MMD with a Material Handling Plan for the RCM stockpiles as a condition of the issued permit. Chino's experience reflecting the relative ease Tyrone and Chino have experienced managing the borrow sites from either shovel pits and/or stockpiles to visually select appropriate material for cover during reclamation of test plots and/or actual reclamation projects can be incorporated in the stockpile specific MHPs.

2. *Provide an estimate of the percentage of unsuitable RCM in each stockpile and demonstrate how the estimates of RCM balances in table 2 were calculated.*

Chino's response:

See response to Comment 1 above for unsuitable RCM percentages for the Upper South Stockpile. A 5% and 1% rejection rate is applied to the STS2 and Rubio peak RCM quantities respectively to account for oversized material.

The available RCM quantities for STS2 and Upper South Stockpile in Table 2 were taken from the *Permit GR009RE Technical Comments on Revision Application 18-1 for the Updated Closure Closeout Plan* submitted to MMD on April 15, 2018. Updated cut/fill analyses completed in AutoCAD for STS2 and Upper South indicated substantially higher available quantities than were previously reported. These updated volumes were developed by generating cut/fill reports in AutoCAD using the base elevations that represent the point at which RCM material begins within each stockpile, compared against current surface topography. The resulting calculated volumes are approximately 10.7 million cubic yards for STS2 and 31.6 million cubic yards for the Upper South. However, to maintain consistency with values historically reviewed by MMD, Chino will continue to use the previously reported (lower) RCM quantities.

These quantities have been updated in the attached Table 2 to reflect the following:

- Updated Rubio Peak Cover Material quantities discussed in primary Comment 1 and Material Handling Plan Comment 3
 - Rejection rates discussed in Comment 1 and the first additional comment on the MHP
 - Relocation of the Whitehouse material to STS2 completed in March 2024
3. *Please provide an updated MHP that incorporates these comments and requests for additional information and considers any additional units not included in the 2021 MHP.*

Chino's response:

Chino is not including a revised Material Handling Plan as part of this response to comments. Chino proposes to provide MMD with a Material Handling Plan for the RCM stockpiles as a condition of the permit.

MMD General Comments

1. *MMD requests that the Legend section for each Figure or Sheet in Appendix C or elsewhere include explanations of all symbols present, even if the symbol is described on another Figure or Sheet.*

Chino's response:

The drawing sheets and figures have been updated to address this comment.

2. *Sheet 3 of Appendix C depicts the Northeast Stockpile within the Pit boundary area. MMD does not concur that the Northeast Stockpile is within the Pit Perimeter. Please revise the depiction of the Pit Perimeter in Sheet 3 and any other applicable figures in the Application or provide a justification for this determination.*

Chino's response:

The current pit limit is corrected on the referenced drawing sheet and other pertinent figures (see attached drawings and figures).

3. *MMD notes that the 2003 Conditional Approval of Waiver Request ("Waiver") bases the boundaries of the waste unit waiver areas on the Open Pit Capture Zone (OPCZ), a conceptual boundary that has since fallen out of use by the State of New Mexico. In closeout plans approved since the approval of the Waiver, the OPCZ has been supplanted by the Open Pit Surface Drainage Area (OPSDA) to determine the boundaries of waste unit waiver areas on the South, West, and Northeast stockpiles. MMD recommends amending the Waiver to formalize the use of the OPSDA boundary for determining what outslopes are reclaimed on the South, West, and Northeast stockpiles.*

Chino's response:

Please see response to Comment 8 above.

4. MMD requests that FMI begin providing separate annual updates of the pit waiver area as it expands due to mining operations.

Chino's response:

Chino agrees that updates of the pit and stockpile waiver areas are useful, but recommends the agency consider whether annual updates are truly necessary. Chino believes that updating them in conjunction with the 5-year CCP updates is sufficient.

NMED Surface Water Quality Bureau

Mine activities may affect SWOTS, which include ephemeral streams and all tributaries of such waters within the area of mining operations, as defined in New Mexico's Standards for Interstate and Intrastate Surface Waters (20.6.4.7 NMAC), Ephemeral surface waters are subject to water quality criteria under 20.6.4.808 NMAC. Furthermore, operations must ensure compliance with General Criteria at 20.6.4.13 NMAC. "General criteria are established to sustain and protect existing or attainable uses of surface waters of the State. These general criteria apply to all surface waters of the state at all times... Surface waters of the State shall be free of any water contaminant in such quantity and of such duration as may with reasonable probability injure human health, animal or plant life or property, or unreasonably interfere with the public welfare or the use of property." (20.6.4.13 NMAC)

The Applicant is required to report all unpermitted discharges and spills immediately after learning of such a discharge, and no more than 24 hours after the unpermitted discharge or spill) to the NMED as required by the New Mexico Water Quality Control Commission regulations (20.6.2.1203 NMAC). The minimum information required to be reported can be found at 20.6.2.1203.A.(1) NMAC. For non-emergencies during normal business hours, call 505- 428-2500. For non-emergencies after hours, call 866-428-6535 or 505-428-6535 (voice mail, twenty-four hours a day). For emergencies only, call 505- 827-9329 twenty-four hours a day (NM Dept of Public Safety). For spills that reach a SWOTS, including ephemeral streams, also report via email at SWQ.reporting@env.nm.gov.

Chino Mine previously had National Pollutant Discharge Elimination System (NPDES) coverage under the Multi-Sector General Permit #NMR053259. The CCP does not require NPDES permitting per a waters of the United States (WOTUS) jurisdictional determination from the US Army Corps of Engineers on May 27, 2020. The nearest surface waters to the site are defined in 20.6.4.808 NMAC, 20.6.4.97 NMAC, and 20.6.4.98 NMAC.

In addition to the above regulatory standards, SWQB requires the following practices to avoid contamination and to protect surface and groundwater quality:

- *Utilize a secondary containment system for fuel, oil, hydraulic fluid, lubricants, and other petrochemicals to prevent spills.*
- *Always keep appropriate spill clean-up materials such as absorbent pads on-site during road construction, site preparations, drilling and reclamation to address potential spills.*
- *Provide a minimum 50' set-back (buffer) distance from existing drainages to staging areas.*
- *Install and maintain best management practices (BMPs) both during and after construction*

to prevent pollutants in stormwater runoff from entering SWOTS.

- *WOTUS jurisdictional determinations are only valid for five (5) years. Procure an updated WOTUS jurisdictional determination from the United States Army Corps of Engineers or the United States Environmental Protection Agency for all future permit modifications and revisions.*
- *Final reclamation designs for facilities affecting SWOTS should reestablish approximate original contour, to the maximum extent practicable, to maintain or restore natural premining hydrologic processes.*

Impacts to Surface Water Quality

The SWQB finds that FMI's CCP is likely to have minimal impacts to surface waters of the state if operated and reclaimed with the approved permits, including relevant stormwater management, BMPs, post-mining cover requirements and revegetation standards specified in "Closure Requirements of Copper Mine Facilities-- NMAC 20.6.7.33.

Chino's response:

Thank you for the review. The current CCP design under review meets all current surface water quality requirements. Chino notes that both federal and state surface water quality requirements are likely to change in the next several years and the final design and reclamation construction will be updated as necessary to ensure that it will meet the applicable surface water requirements at the time of closure.

NMED Air Quality Bureau

The Air Quality Bureau does not have any objection to this CCP update.

Chino's response:

Thank you for the review

New Mexico Department of Game and Fish (NMDG&F)

The CCP states that Chino will "minimize adverse impacts to waterfowl and other wildlife resulting from ponding or water impounded in the pit areas" but does not specify how this would be achieved and maintained after mine closure.

Chino's response:

Similar to the approved 2018 CCP, the three pit bottom sumps will have relatively small water surfaces under normal operations that will temporarily grow larger in response to storm events. The pit sumps will normally be only about 2 acres in size (as described in a January 17, 2019 NMED response letter). These will be covered by floating barriers to ensure they are not attractive to birds. This has been demonstrated as an effective wildlife protection technique at the mines currently.

*The Department recommends that all wildlife should be excluded from accessing potentially toxic pit lake water to the greatest extent that is reasonably feasible. Post-closure, the pit lake should be fenced to exclude terrestrial wildlife. The above-ground fence height should be a minimum of eight feet to exclude deer and elk (*Cervus canadensis*) and should include an additional two feet of fence that extends below*

ground to deter animals from burrowing under, for a total of ten feet. The Department also recommends that the bottom two feet of the above-ground fence include a permanent solid or scored plastic or metal barrier, potentially with a horizontal lip at the top, to exclude smaller animals from accessing the pit lake.

Chino's response:

Chino opposes the addition of the proposed wildlife fencing. It is our experience that wildlife fencing to this extent is not necessary to keep terrestrial wildlife from traveling to the bottom of the open pit. There is no suitable habitat attractive to terrestrial wildlife within the lower portions of the Santa Rita Open Pit and personnel will continue to be onsite to operate dewatering systems who will also monitor wildlife and birds.

The Department would also like clarification regarding what methods Chino will utilize to exclude birds from accessing the pit lake water after mine closure (e.g., floating bird balls or hexagons, netting, hazing). The Department is available for consultation to help Chino determine the most cost-effective way to prevent or minimize the potential for birds to come in contact with potentially toxic pit lake water.

Chino's response:

Chino agrees with placing a floating barrier at closure. See previous response.

The Department also recommends that Chino provides some type of alternative, clean water sources that would help attract wildlife away from the pit lake area.

Chino's response:

As stated above, at closure the hazard of wildlife being attracted to the pit water management sumps is eliminated. There are stock watering ponds provided by the agricultural industry all around the Chino mine away from the pit area.

The CCP water management plan states that the pit lake water level will be maintained by pumping pit lake water out onto flat areas within the Santa Rita pit and evaporated. The evaporative salts that accumulate in this process would then be removed and stored as a potential future resource. This technique seems to be the long-term strategy that Chino is proposing to maintain pit lake water levels in perpetuity after mine closure. The Department questions whether this type of pit lake water management can realistically be maintained in perpetuity and suggests that Chino design a more self-sustaining alternative for implementation.

Chino's response:

A key aspect of the proposed water management plan is that Chino will intercept groundwater inflow into the pit before it becomes impacted. This water is treated (if necessary) and then released. Only the water that cannot be intercepted and is subsequently contaminated is routed to the long-term evaporation system. Using this process, the amount of water that is contaminated within the open pit and reporting to the evaporation system is minimized. This approach is as sustainable as any other strategy involving water treatment as all water treatment technologies generate a waste or byproduct (sludge) to be managed and this approach minimizes that material in the long term. Because this approach minimizes the amount of water impacted by the Open Pit and minimizes waste generation, we believe the public and regulatory agencies should support this approach.

In general, the Department concurs with Chino's proposed reclamation seed mix with the following recommendations:

- Change the common name for *Linum lewisii* from blue flax to Lewis flax. Blue flax (*Linum perenne* L.) is a similar Eurasian plant that has naturalized throughout the United States.
- One of the alternative species, white sweet clover (*Melilotus alba*), is not native to New Mexico. The Department recommends using the native species blanket flower (*Gaillardia pulchella*) or some other appropriate native species.

Chino's response:

Thank you for the review and advice on the seed mix. Chino will update the common name of Lewis flax and evaluate if the white sweet clover that has been very successful in helping meet reclamation standards on our reclaimed surfaces can be adequately replaced by the other recommended native species.

Forestry Division

*Based on the plan provided, it is possible that *Scrophularia macrantha* (Mimbres figwort) could be impacted if the Santa Rita Pit were expanded, or if the SW Lampbright stockpile were breached or modified, as this species was last documented in the mid-1990s in T17S R12W Sections 35 and 36, and in T18S R12 Sections 1 and 2, adjacent to the Santa Rita pit. This species was also documented in 2023 approximately 14 miles northeast of the project area. Mimbres figwort typically occurs within the lower slopes of steep, rocky, north-facing igneous cliffs, along canyon bottoms, within pinon-juniper woodlands or mixed coniferous forest (6,500-8,200 ft). It is recommended that a botanical survey be conducted prior to any ground disturbance, if necessary. This survey should be performed by a qualified botanist with expertise in identifying state-endangered plants, preferably during periods when the plants are flowering or fruiting.*

If any state-listed endangered plants are found within the project site, an incidental take permit will be required if plants are likely to be destroyed or harmed. Alternatively, mitigation measures should be developed to minimize disturbance.

Chino's response:

Thank you for the review and comments. The CCP update is focused on reclaiming the mine facilities. Chino does update its biological surveys (including rare plant species) as a matter of company environmental stewardship and to support permitting processes for expansions of existing mine units and for new mine units.

White Mountain Apache Tribe

Please be advised, we have reviewed the information provided, and we have determined the proposed Closure/Closeout Plans will have a "No Adverse Effect" to the tribe's cultural heritage resources. We concur with the proposed Closure project plans.

Chino's response:

Thank you for the review.

If you have any questions or concerns, please contact me at (575) 912-5927 or Mariana Lafon at (575) 912-5234.

Sincerely,

Sherry BurtKested

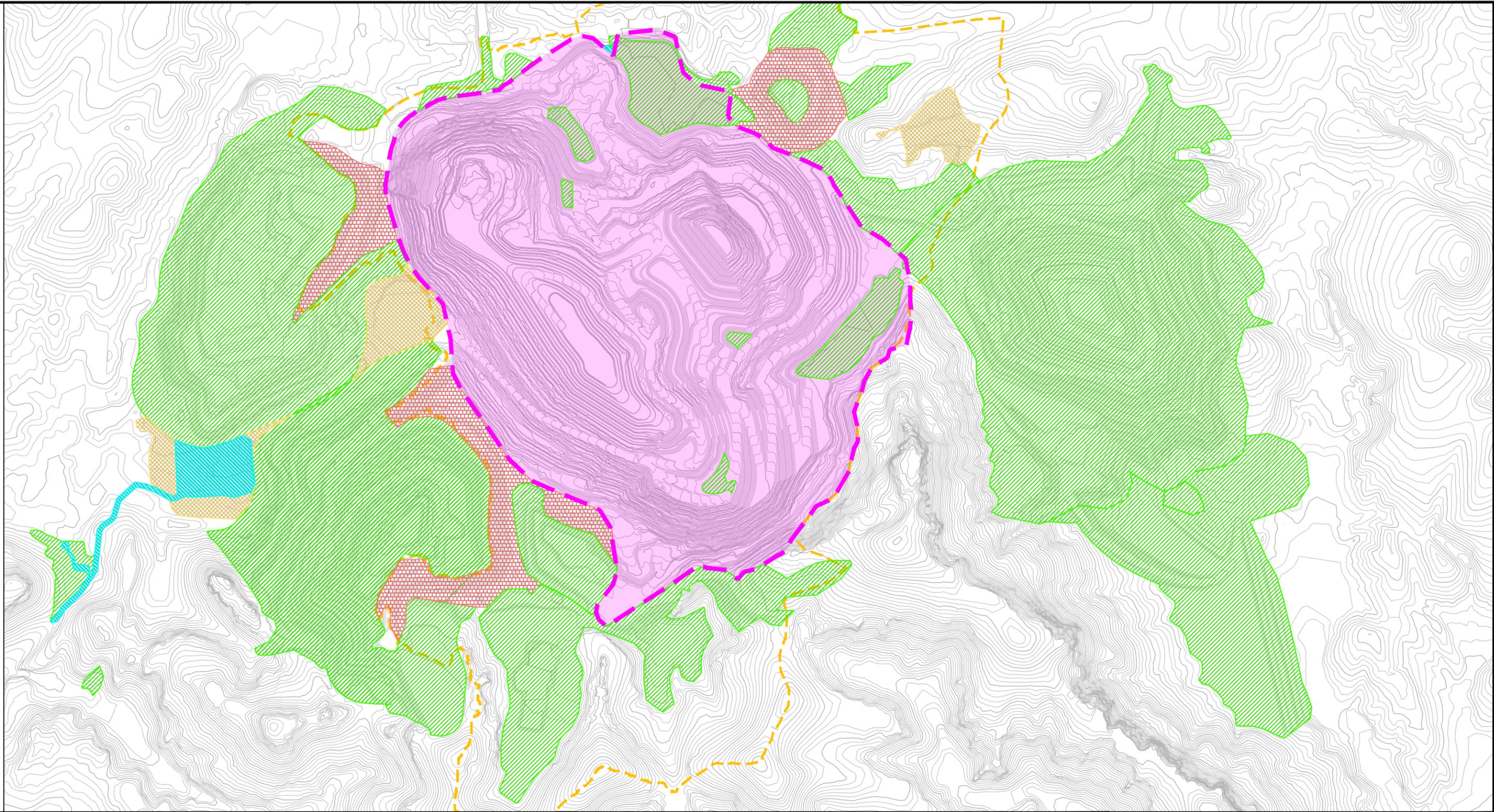
Sherry Burt-Kested, Manager
NMO Environmental Services

SBK:ml
Enclosures
20251209-003

ec: David Ennis, MMD

Figures

Date: 12/10/2025 5:52:27 PM R:\Chino\Chino CCP+Cost Estimating\2024_CCP_RCE\Calculations\AutoCad\Salt Disposal\Main CCP Figure 11 b.dwg Plotted By: Ethan Hopwood

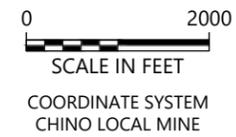


LEGEND:

-  OPDA 2030
-  WILDLIFE
-  CURRENT OPEN PIT LIMIT/WAIVER AREA
-  STOCKPILE WAIVER AREA EXTERIOR TO OPEN PIT
-  WATER MANAGEMENT
-  INDUSTRIAL AREA

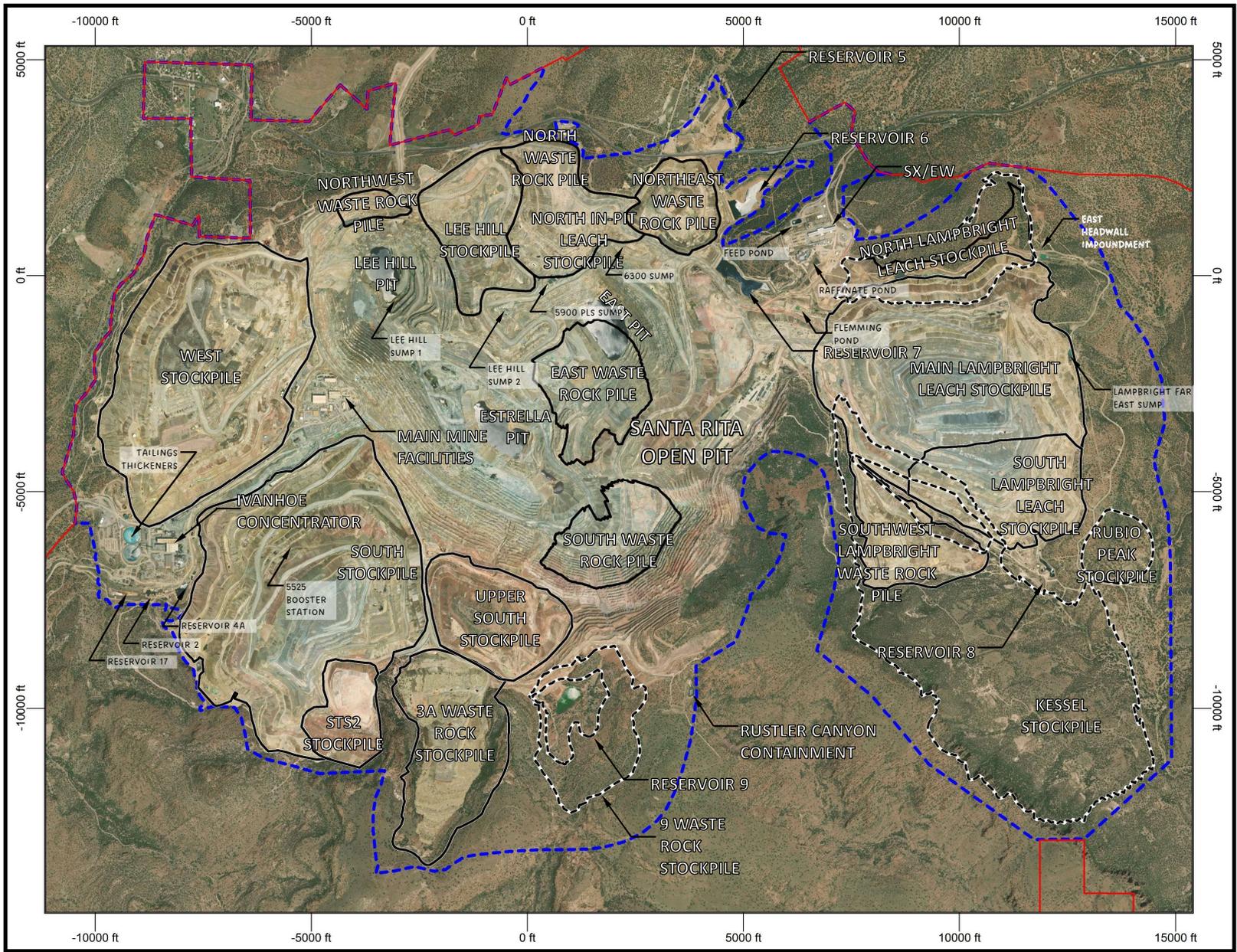
NOTES:

SEE APPENDIX G FIGURE 2 FOR OTHER WATER MANAGEMENT COMPONENTS



**FIGURE 11
NMA PMLU**

PROJECT: 200430A-002	TASK: 02	DATE: 12/10/2025	DRWN BY: EH	PREPARED FOR:
PREPARED BY: TELESTO SOLUTIONS INCORPORATED				Freeport-McMORAN



- NOTES:**
- AERIAL IMAGERY: CHINO MINES SATELLITE SURVEY, APRIL 21, 2024
- FACILITY BOUNDARY
 - - - 2018 DESIGN LIMITS
 - MINE PERMIT BOUNDARY
 - - - DESIGN LIMIT UPDATES

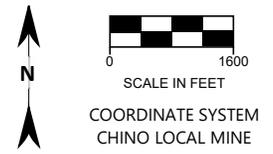


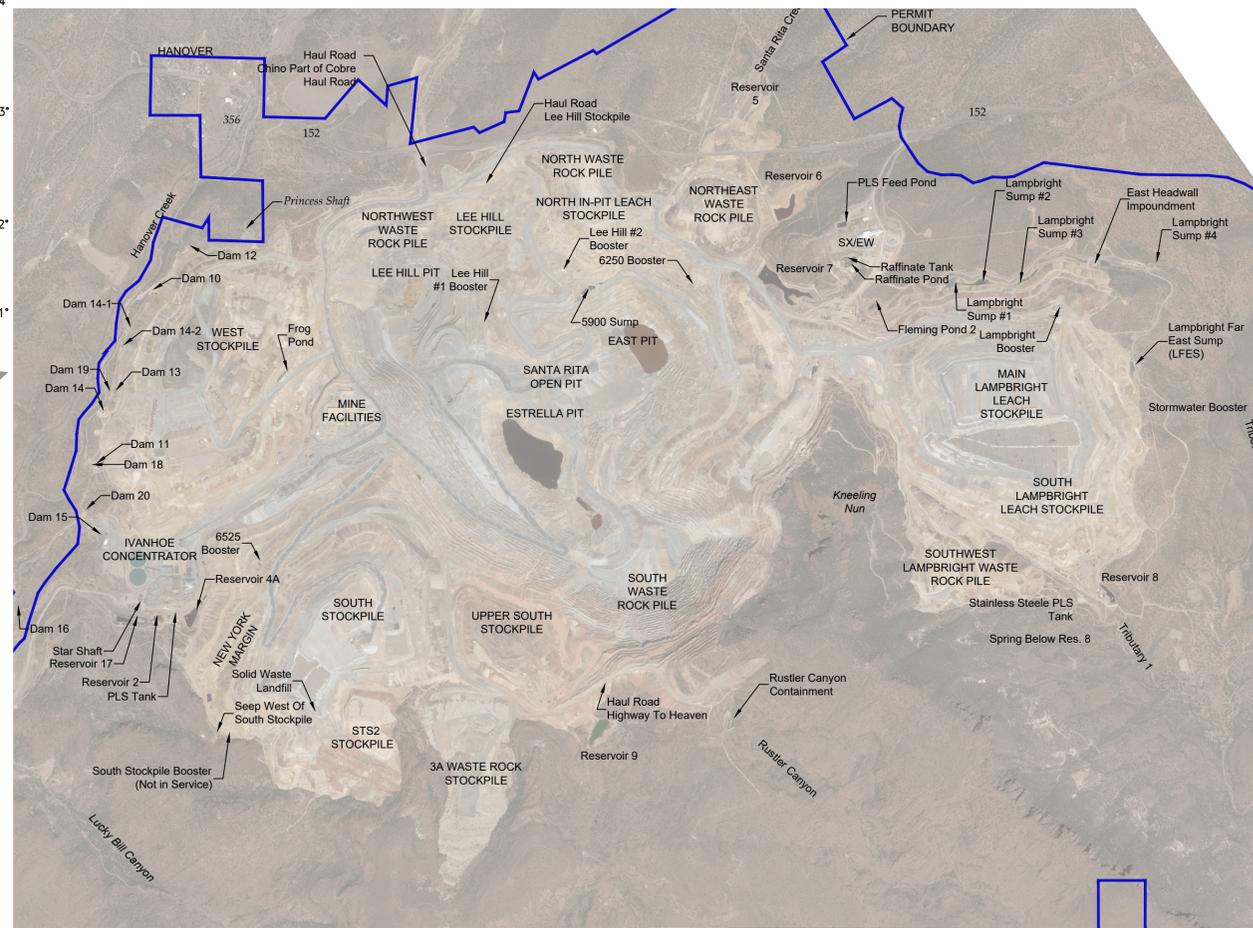
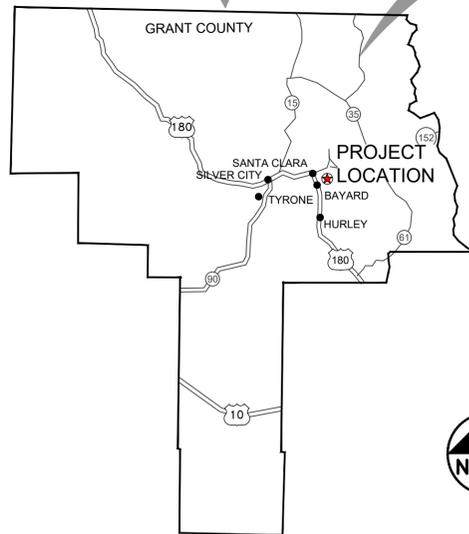
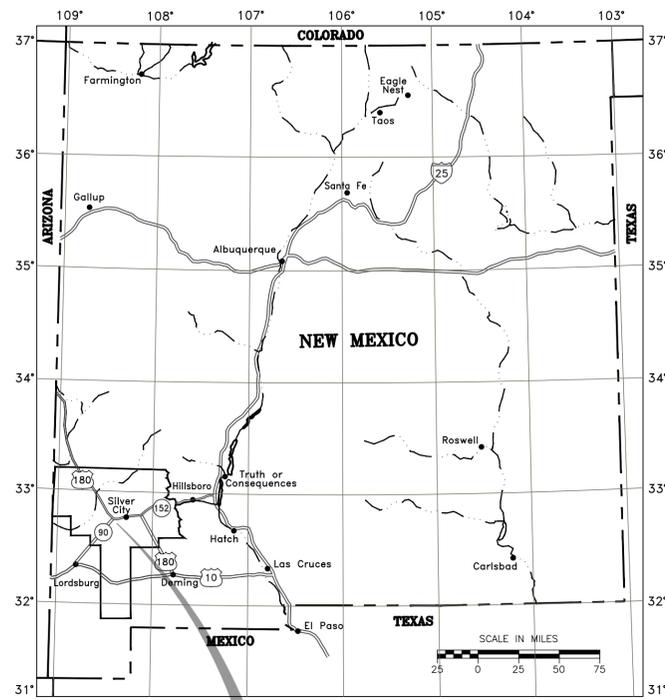
FIGURE 13
NMA DESIGN LIMIT UPDATE

PREPARED BY:
TELESTO
SOLUTIONS INCORPORATED

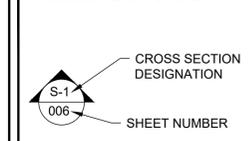
PREPARED FOR:
Freeport-McMoRan

Appendix C

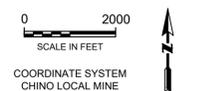
CHINO MINE AREA END OF YEAR 2030 CONCEPTUAL RECLAMATION PLAN DRAWINGS



LEGEND & NOTES



REFERENCE
1. END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING



SHEET INDEX

Sheet Number	Sheet Title
01	COVER SHEET
02	NMA PRE-RECLAMATION TOPOGRAPHY
03	NMA POST-RECLAMATION TOPOGRAPHY
04	SOUTH, STS2 & UPPER SOUTH STOCKPILE GRADING & DRAINAGE PLAN
05	SOUTH, STS2 & UPPER SOUTH STOCK PILE X-SECTIONS
06	LAMPBRIGHT & KESSEL GRADING AND DRAINAGE PLAN
07	LAMPBRIGHT X-SECTIONS
08	SW LAMPBRIGHT & KESSEL X-SECTIONS
09	WEST STOCKPILE GRADING & DRAINAGE PLAN
10	WEST STOCKPILE X-SECTIONS
11	NE WASTE ROCK PILE GRADING & DRAINAGE PLAN, SALT DISPOSAL PLAN
12	3A WASTE ROCK STOCKPILE GRADING AND DRAINAGE PLAN
13	3A WASTE ROCK STOCKPILE X-SECTIONS
14	TYPICAL SECTIONS
15	NMA COVER AREAS
16	NMA COVER BORROW AREAS
17	NMA COVER HAUL ROUTES
18	NMA REVEGETATION PLAN
19	SMA PRE-RECLAMATION TOPOGRAPHY
20	SMA POST-RECLAMATION TOPOGRAPHY
21	AXIFLOW GRADING & DRAINAGE PLAN
22	AXIFLOW X-SECTIONS
23	TAILINGS POND 7 GRADING AND DRAINAGE PLAN
24	TAILINGS POND 7 X-SECTIONS
25	SMA COVER PLAN
26	SMA COVER BORROW AREAS
27	SMA COVER HAUL ROUTES
28	SMA REVEGETATION PLAN

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SW
PROJECT ENGINEER	WN
CHECKED BY	JC

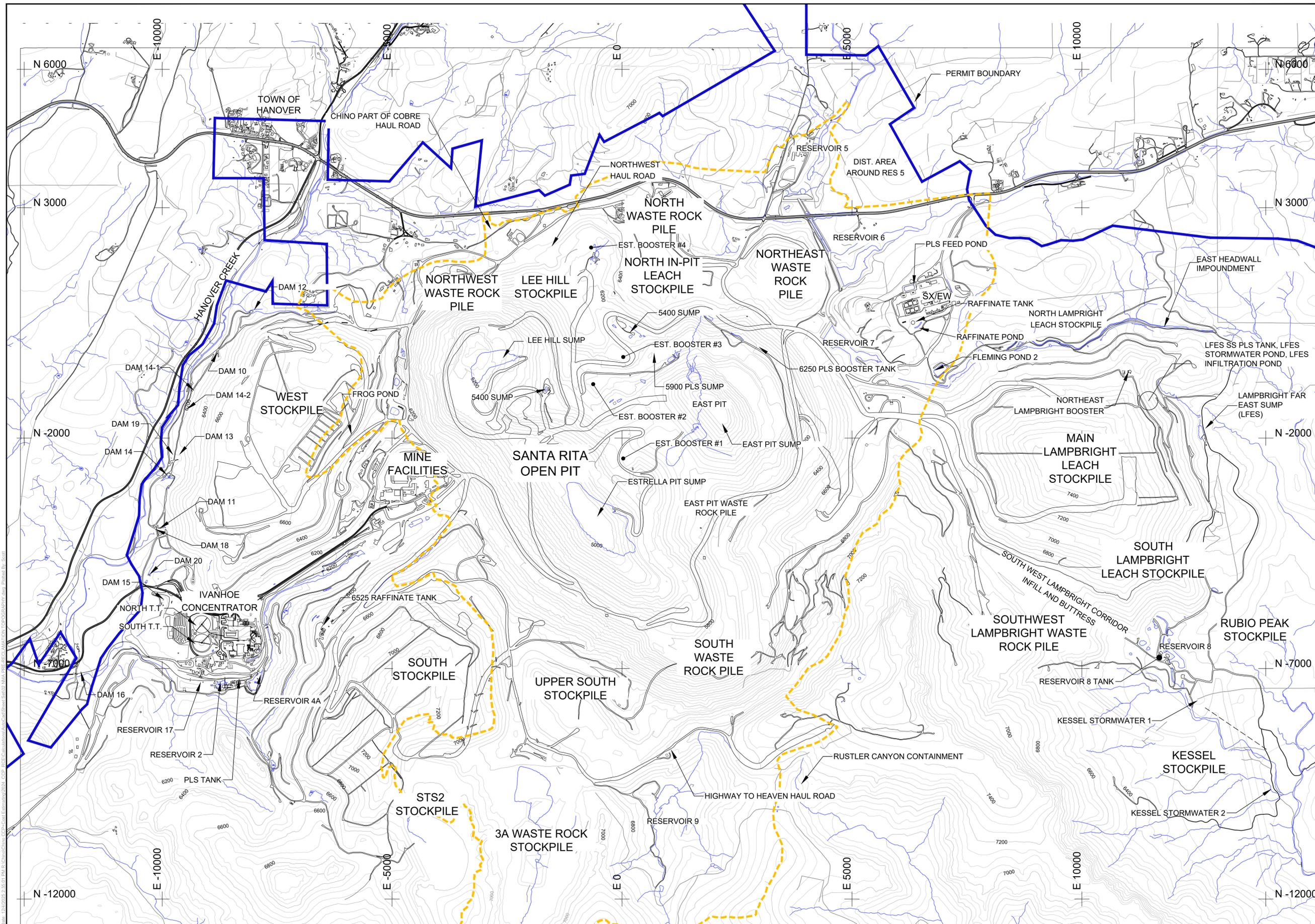
CHINO MINE AREA RECLAMATION

COVER SHEET

SHEET NUMBER: 01	REVISION NUMBER: 3
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LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE
- CROSS SECTION DESIGNATION
- S-1
- 006
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 1000
SCALE IN FEET

CONTOUR INTERVAL = 20' MAJ
50' MIN

COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

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2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

DATE	12/1/25
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TASK NUMBER	02
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PROJECT ENGINEER	WN
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CHINO MINE AREA RECLAMATION

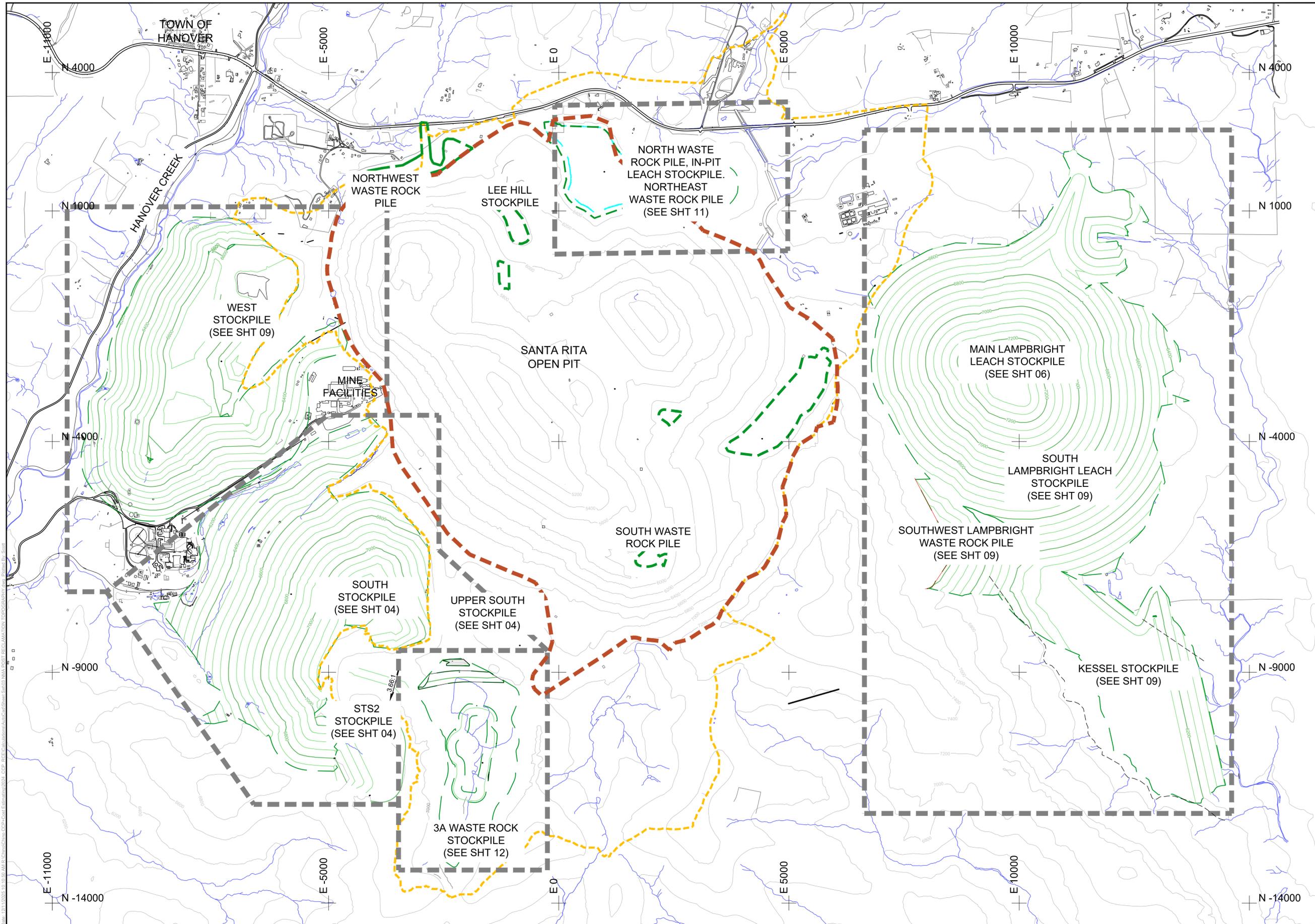
**NMA
PRE-RECLAMATION
TOPOGRAPHY**

SHEET NUMBER: 02 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:
FW **FREPORT-McMORAN**



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- E0Y 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
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- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

- S-1
- 006
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

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COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

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TASK NUMBER	02
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PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

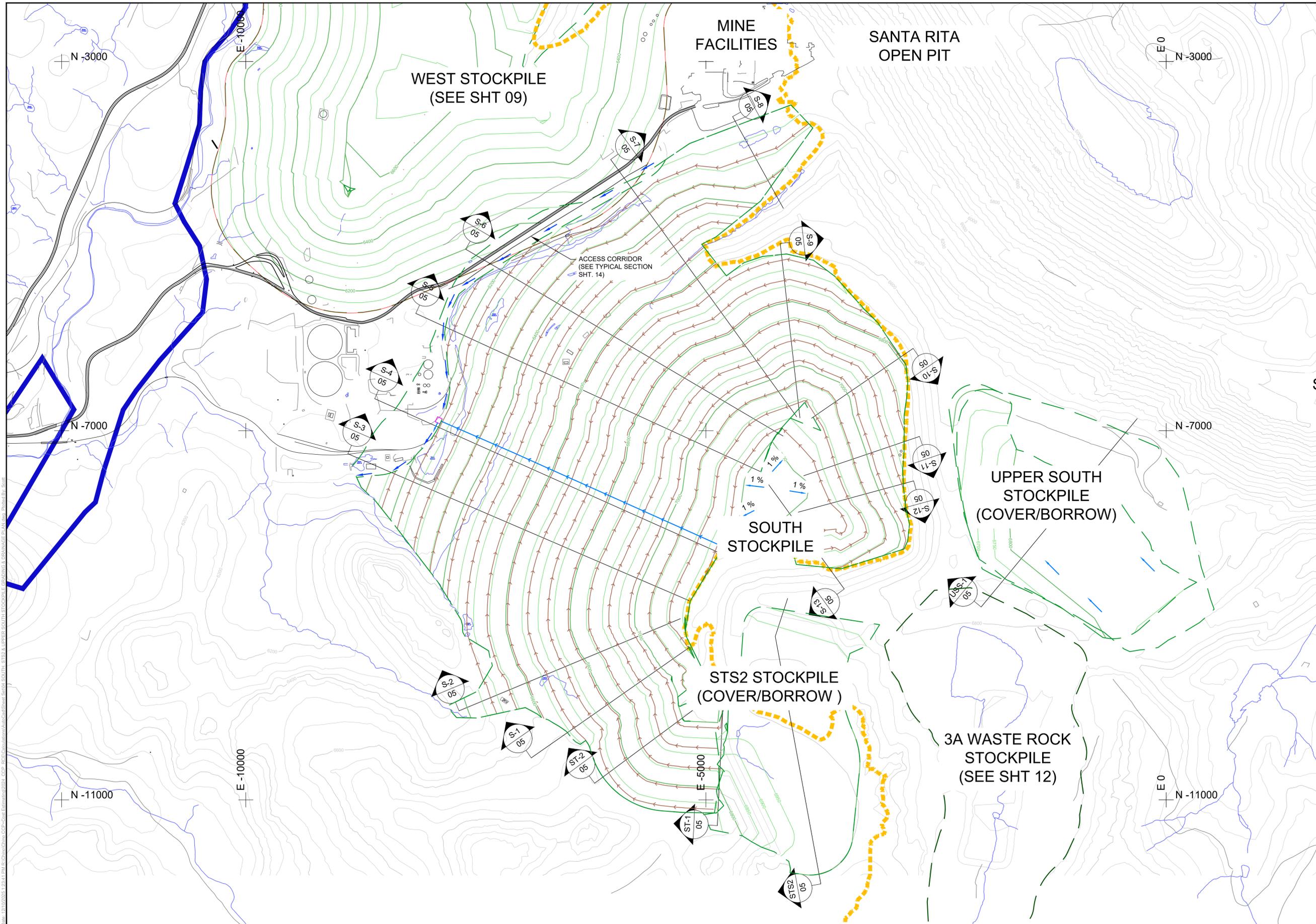
NMA POST-RECLAMATION TOPOGRAPHY

SHEET NUMBER: 03 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:
Freeport-McMoRan



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
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- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

S-1
006 SHEET NUMBER

REFERENCE

1. END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

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SCALE IN FEET

CONTOUR INTERVAL = 20' MAJ
50' MIN

COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

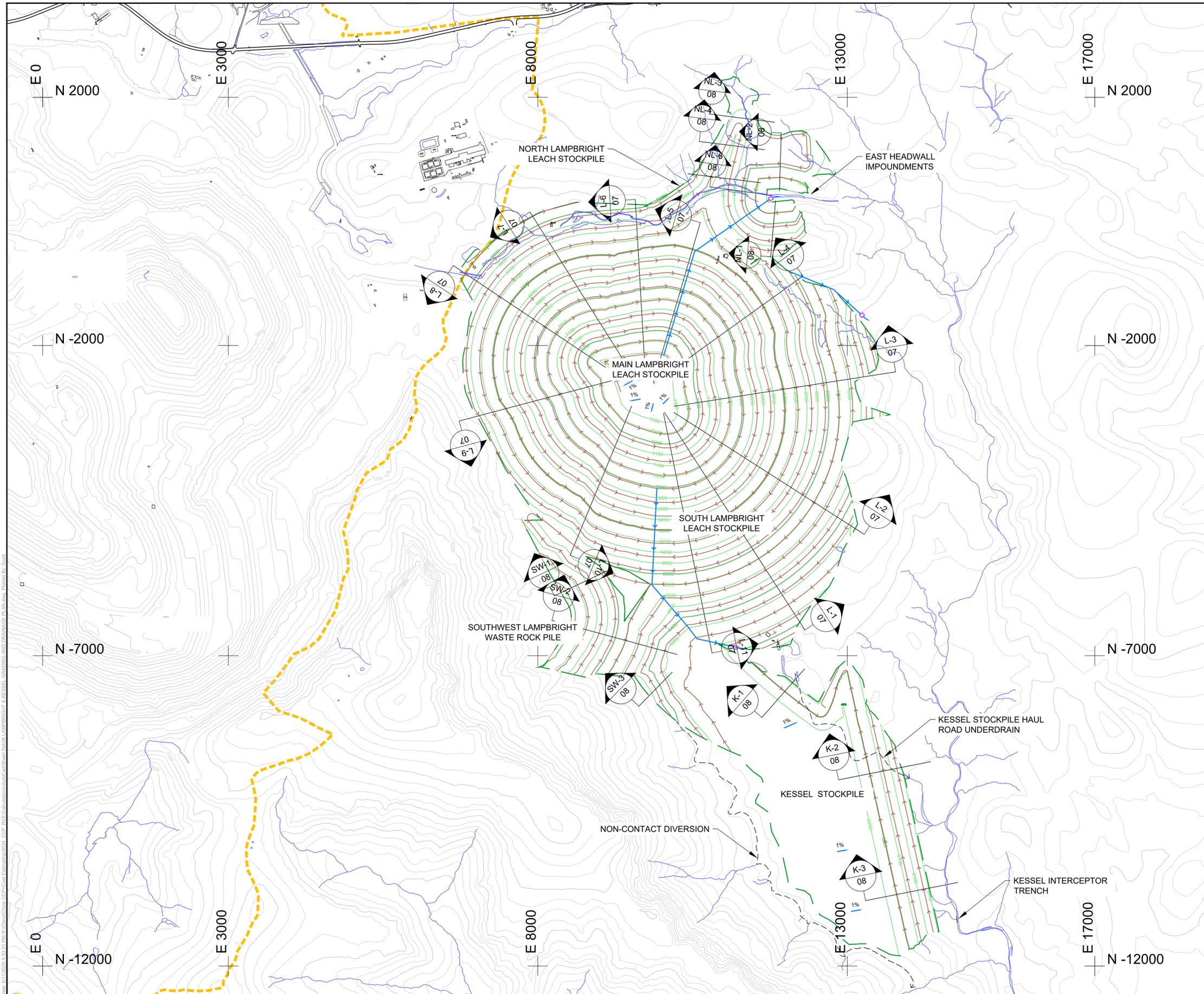
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DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

SOUTH, STS2 & UPPER SOUTH STOCKPILE GRADING & DRAINAGE PLAN

SHEET NUMBER:	04	REVISION NUMBER:	3
PREPARED BY:	TELESTO SOLUTIONS INCORPORATED		
PREPARED FOR:	F&W FREEMPORT-MCMORAN		



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
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- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

- S-1
- 006
- SHEET NUMBER

REFERENCE

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SCALE IN FEET
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30' MIN
COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

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4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

**LAMPBRIGHT & KESSEL
GRADING AND
DRAINAGE PLAN**

SHEET NUMBER: 06 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:
Freeport-McMoRan

LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
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- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE
- CROSS SECTION DESIGNATION
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 500
SCALE IN FEET

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
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3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
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PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

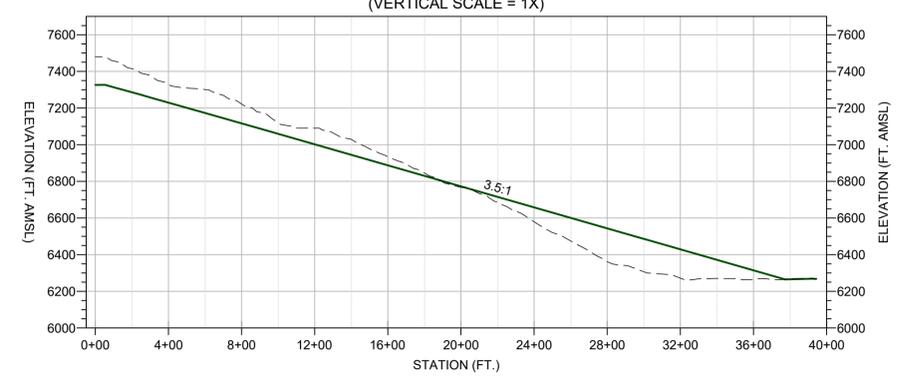
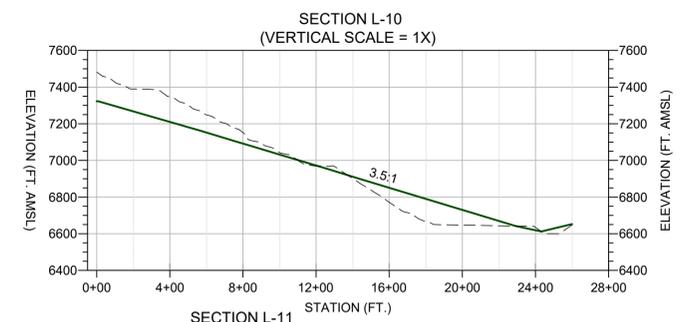
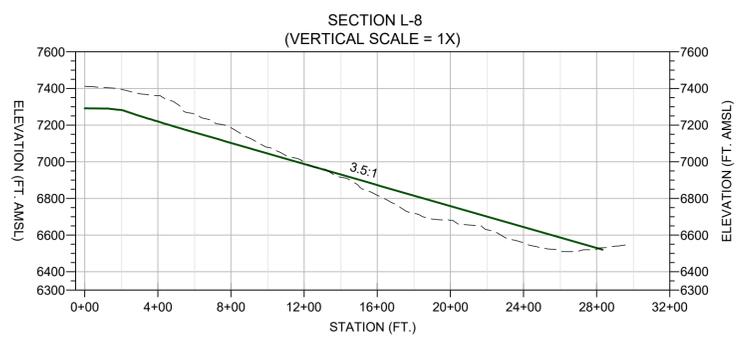
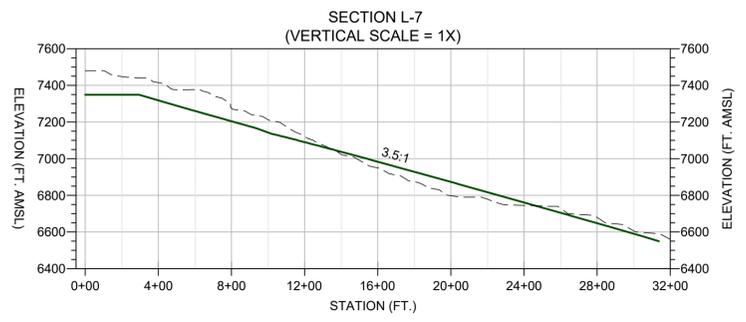
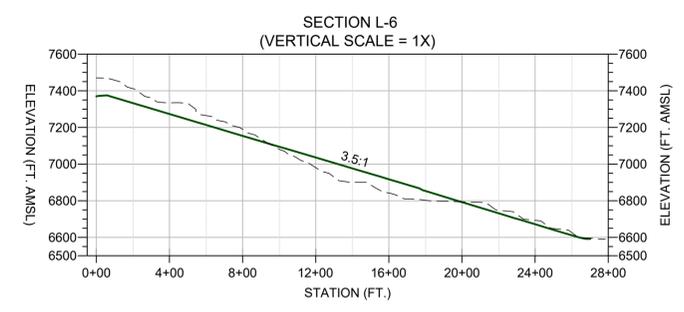
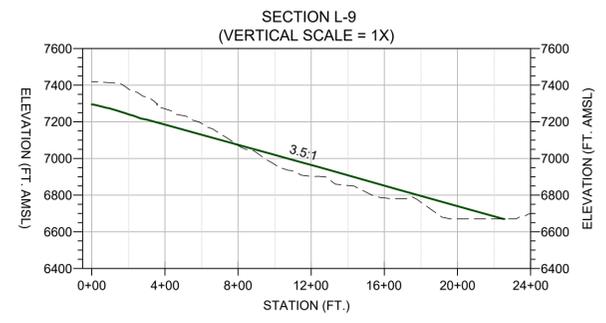
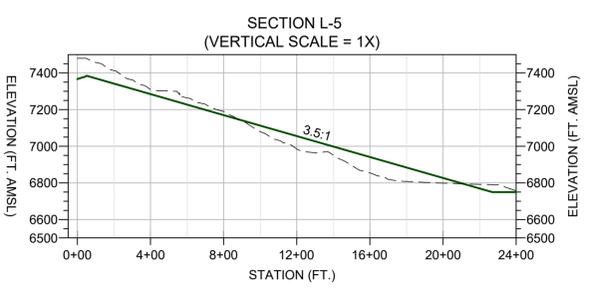
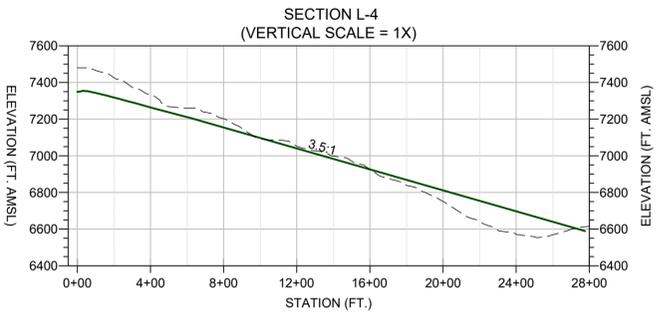
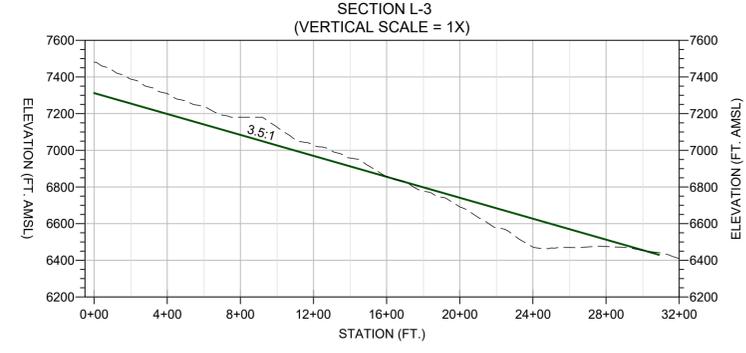
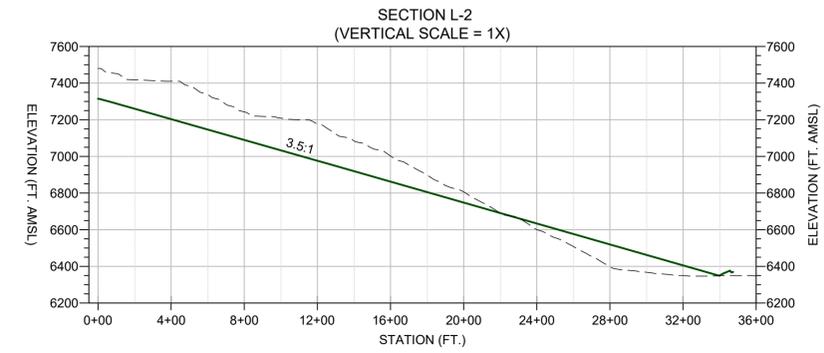
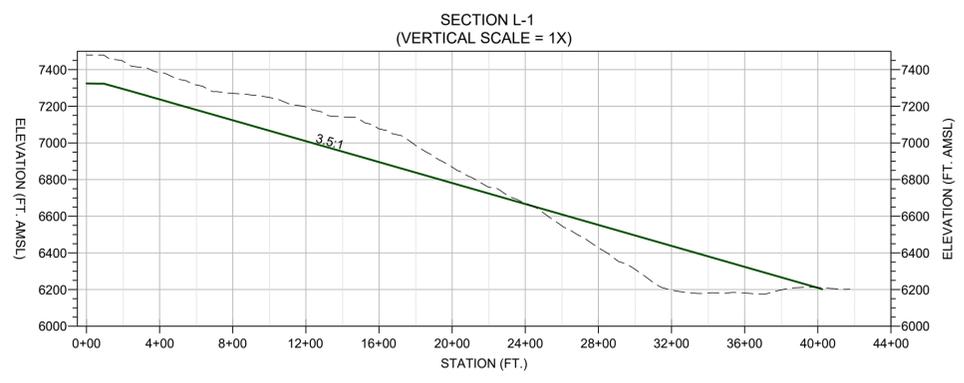
LAMPBRIGHT X-SECTIONS

SHEET NUMBER: 07 REVISION NUMBER: 3

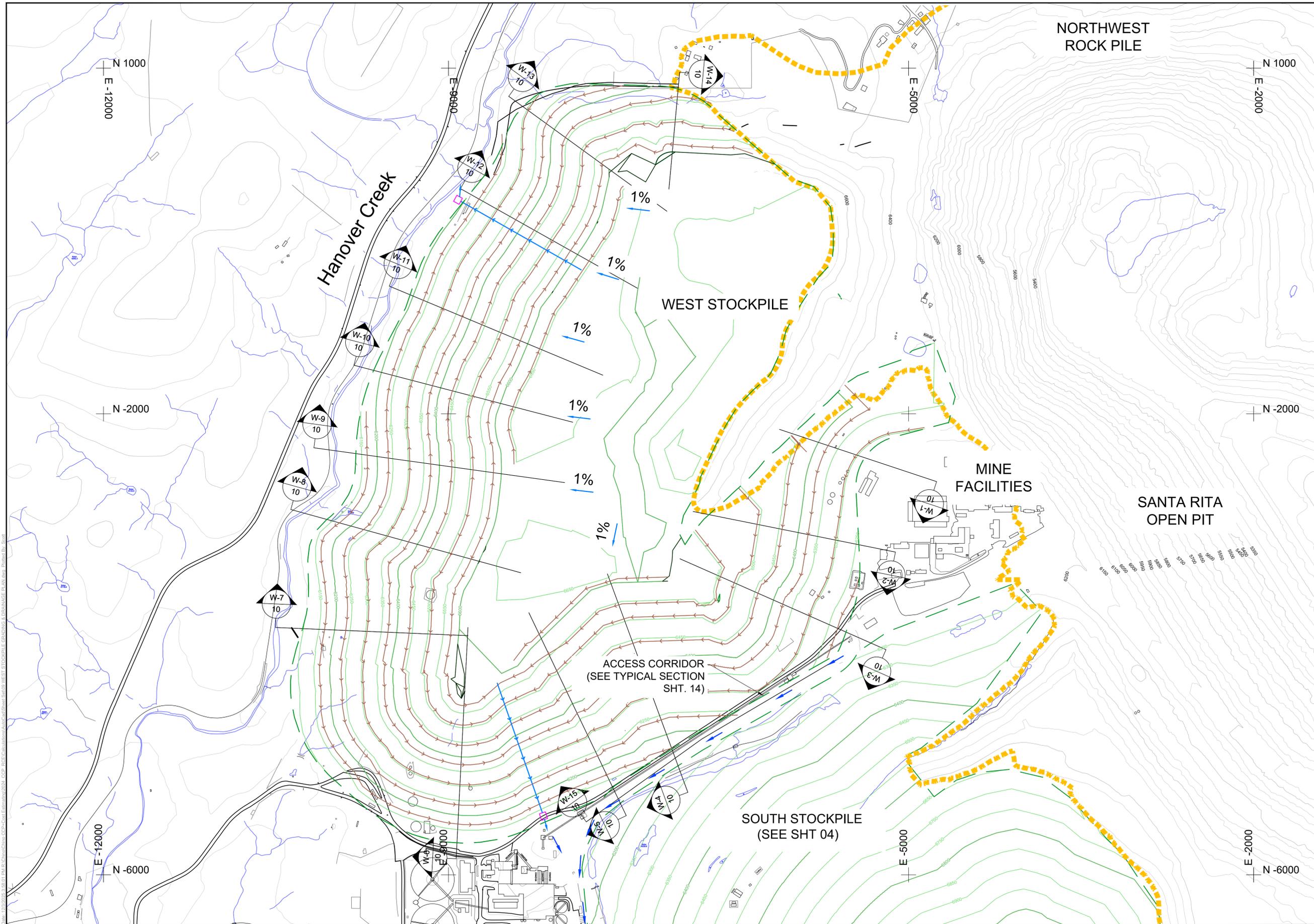
PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:
Freemport-McMoran



Date: 12/1/2025 11:43:43 AM BY: Chino/Chino/CCP/Coal/Entire/12/1/2025 CCP: RECD/Chino/Entire/12/1/2025 CCP: RECD/Chino/Entire/12/1/2025 CCP: RECD/Chino/Entire/12/1/2025



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
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- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 400
SCALE IN FEET

CONTOUR INTERVAL = 20' MAJ
50' MIN

COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

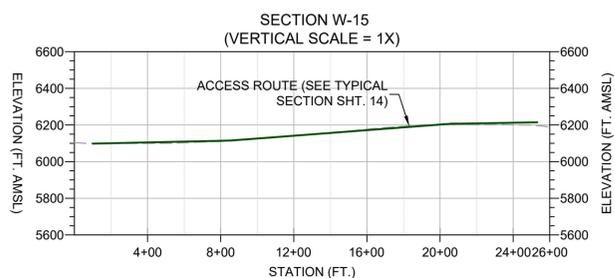
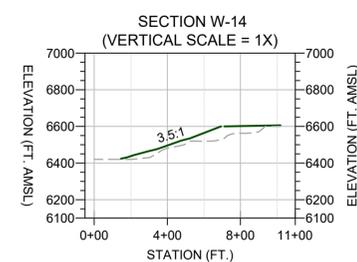
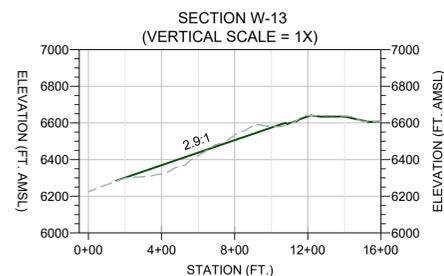
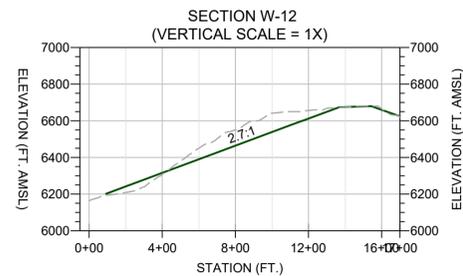
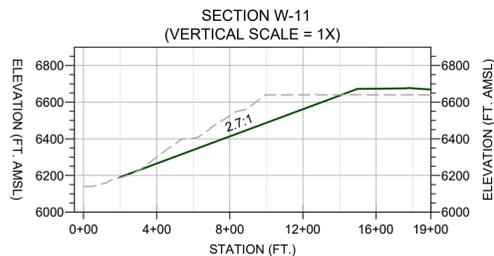
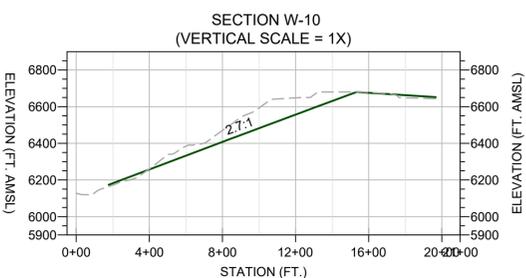
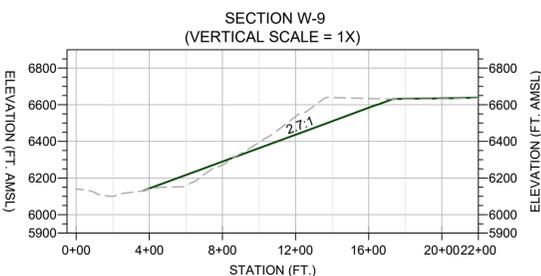
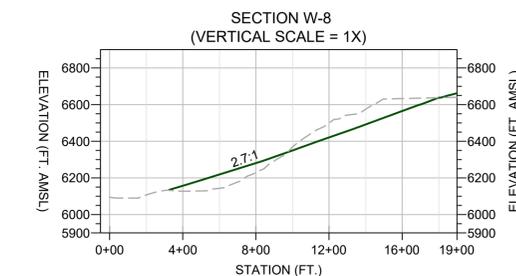
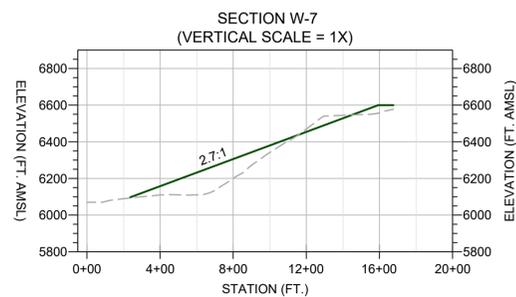
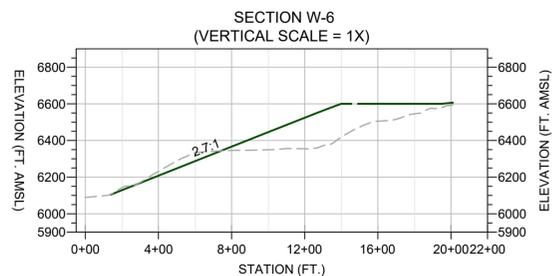
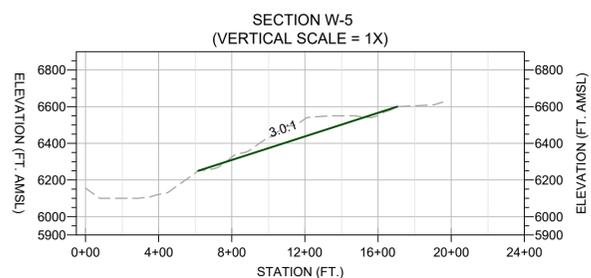
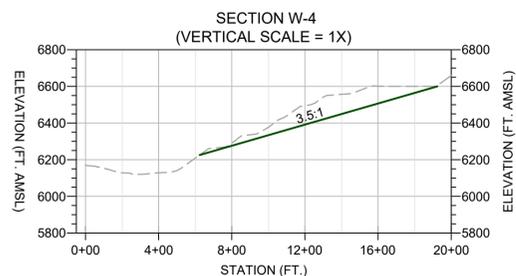
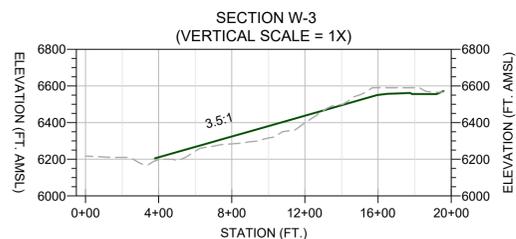
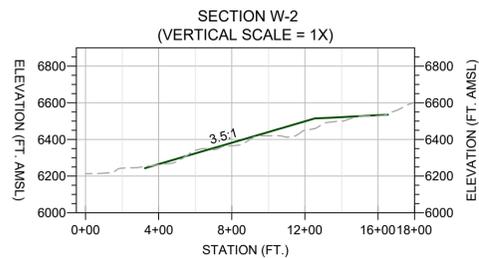
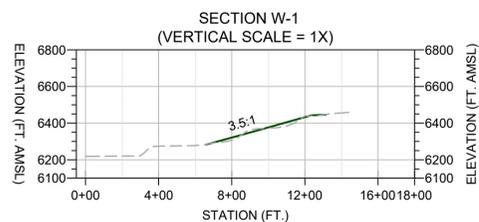
CHINO MINE AREA RECLAMATION

WEST STOCKPILE GRADING & DRAINAGE PLAN

SHEET NUMBER: 09 REVISION NUMBER: 3

PREPARED BY: TELESTO SOLUTIONS INCORPORATED

PREPARED FOR: FREEPORT-MCMORAN



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

S-1
006
SHEET NUMBER

REFERENCE

1. END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 500
SCALE IN FEET

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/08/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

WEST STOCKPILE X-SECTIONS

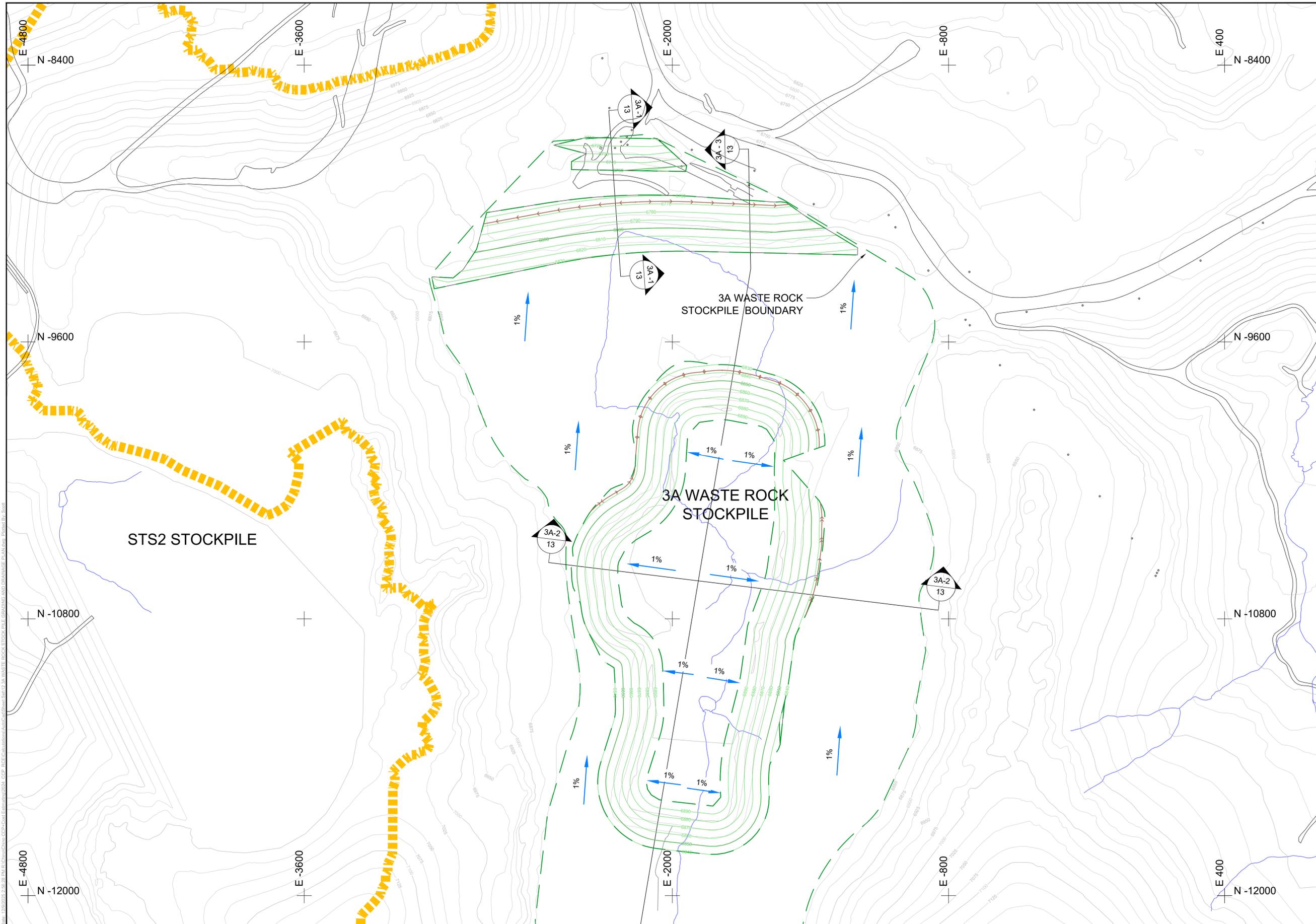
SHEET NUMBER:	10	REVISION NUMBER:	3
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PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:

Freeport-McMoRan



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

- S-1

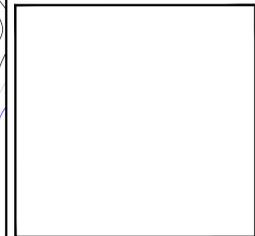
SHEET NUMBER

- 006

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

SCALE IN FEET
 REC. CONT. SHOWN AT 10' INTERVAL FOR CLARITY
 CONTOUR INTERVAL = 100' MAJ 25' MIN
 COORDINATE SYSTEM
 CHINO LOCAL MINE



REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

3A WASTE ROCK STOCKPILE GRADING AND DRAINAGE PLAN

SHEET NUMBER: 12 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:

Freeport-McMoRan

Data: 20250205 11:58:28 PM E:\Chino\Chino_CDD\Area\Reclamation\3A Waste Rock Stockpile Grading and Drainage Plan.dwg, Plotted By: Smit

LEGEND & NOTES

- PERMIT BOUNDARY
- OPDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

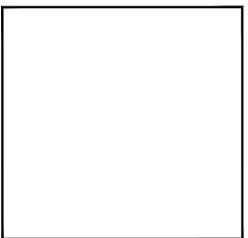
CROSS SECTION DESIGNATION

S-1
006 SHEET NUMBER

REFERENCE

1. END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 200
SCALE IN FEET



REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
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4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

3A WASTE ROCK STOCKPILE X-SECTIONS

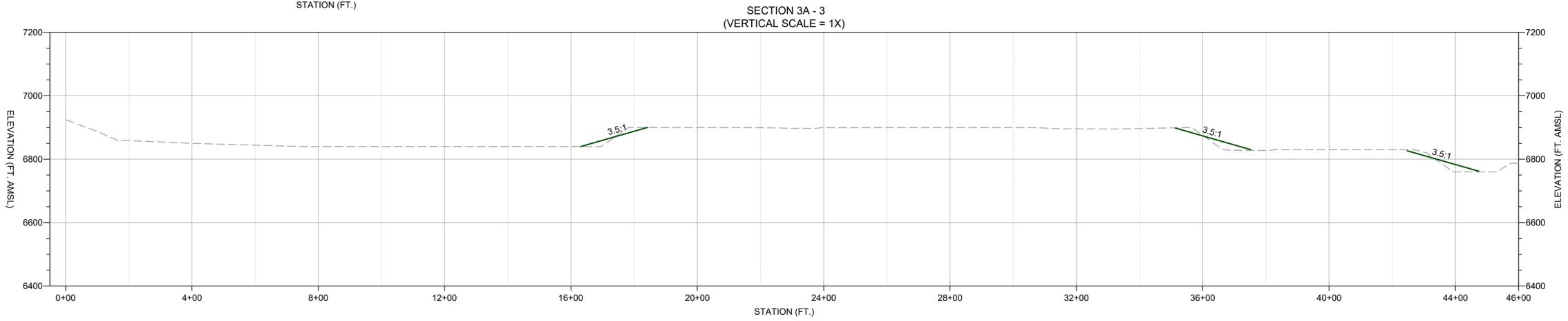
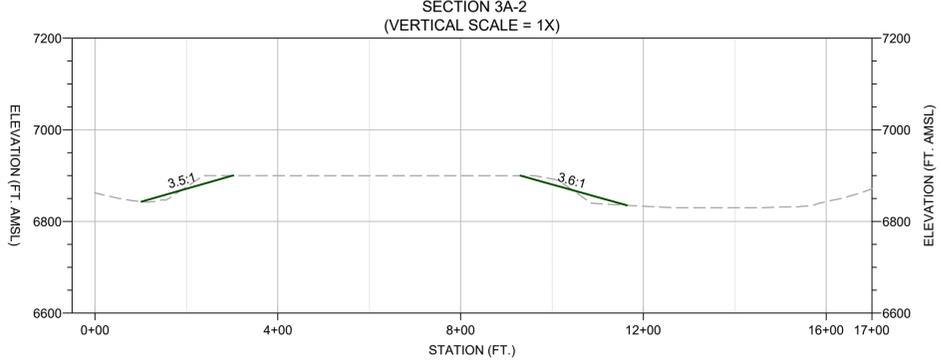
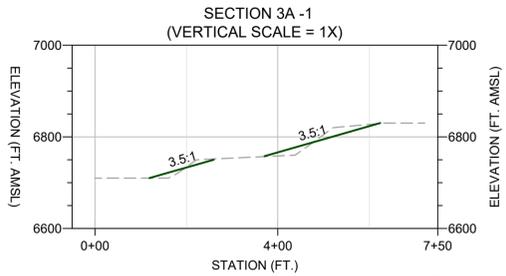
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13	3

PREPARED BY:

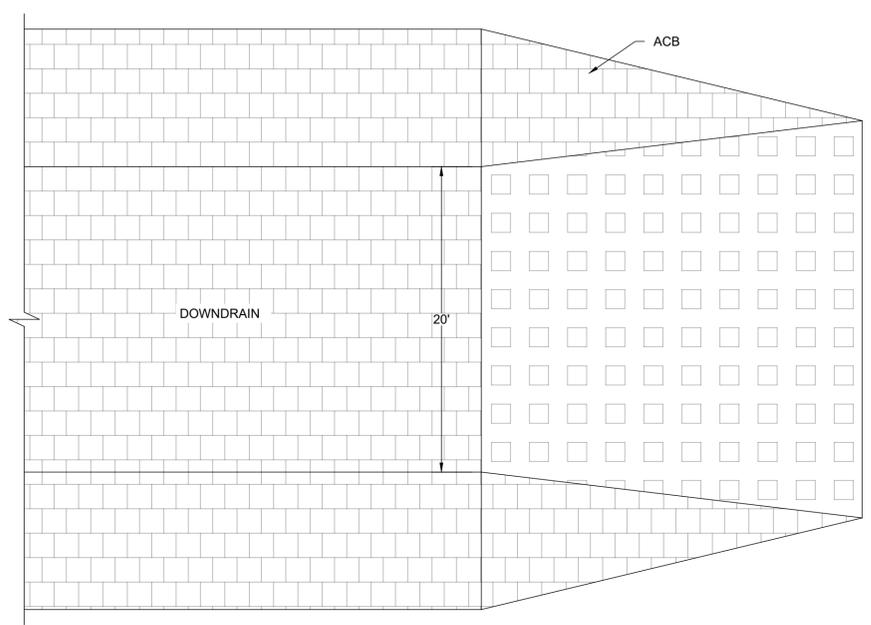
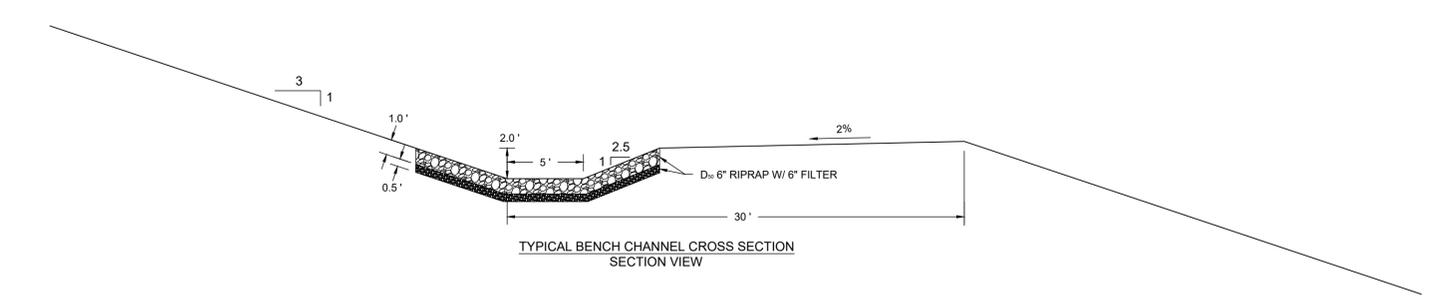
TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:

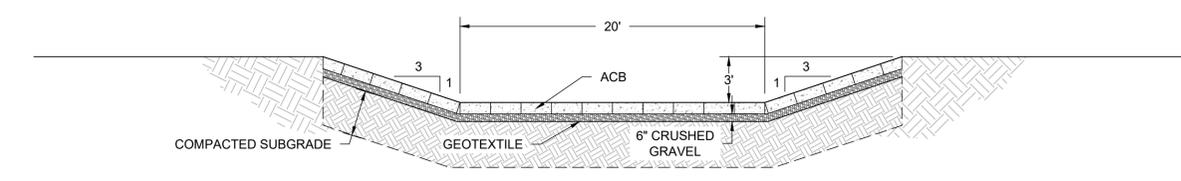
Freemport-McMoran



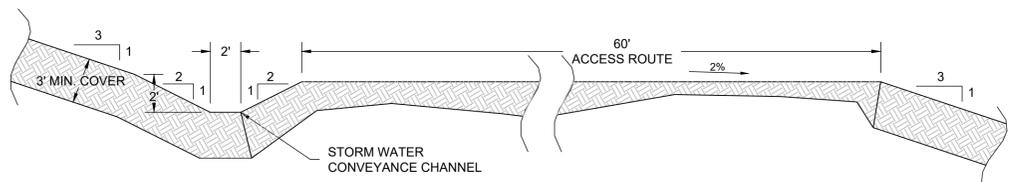
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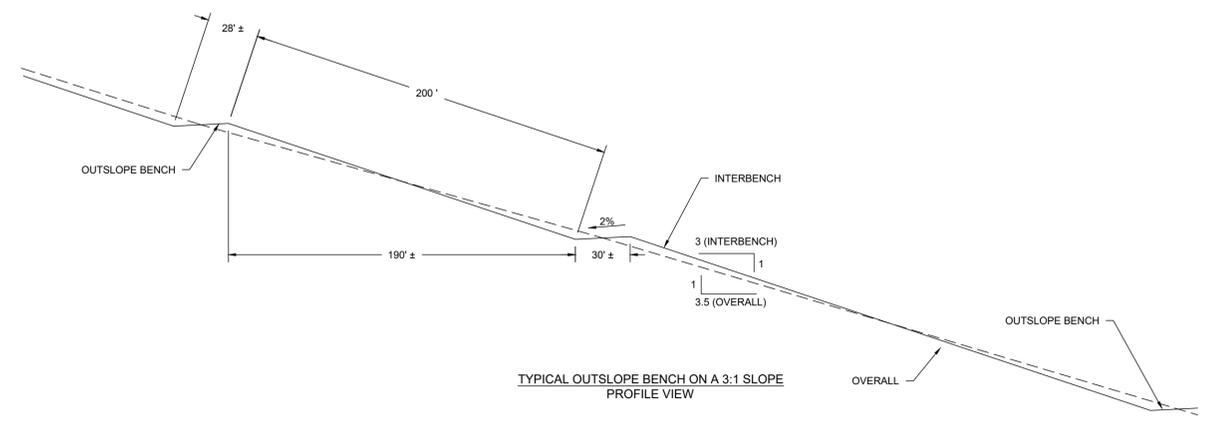
TYPICAL ENERGY DISSIPATOR
PLAN VIEW



TYPICAL DOWNDRAIN
SECTION VIEW



ACCESS CORRIDOR
- TYPICAL SECTION -



TYPICAL OUTSLOPE BENCH ON A 3:1 SLOPE
PROFILE VIEW

LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE
- CROSS SECTION DESIGNATION
- SHEET NUMBER

REFERENCE

1. END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 6
SCALE IN FEET

COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
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DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

TYPICAL SECTIONS

SHEET NUMBER:	14	REVISION NUMBER:	3
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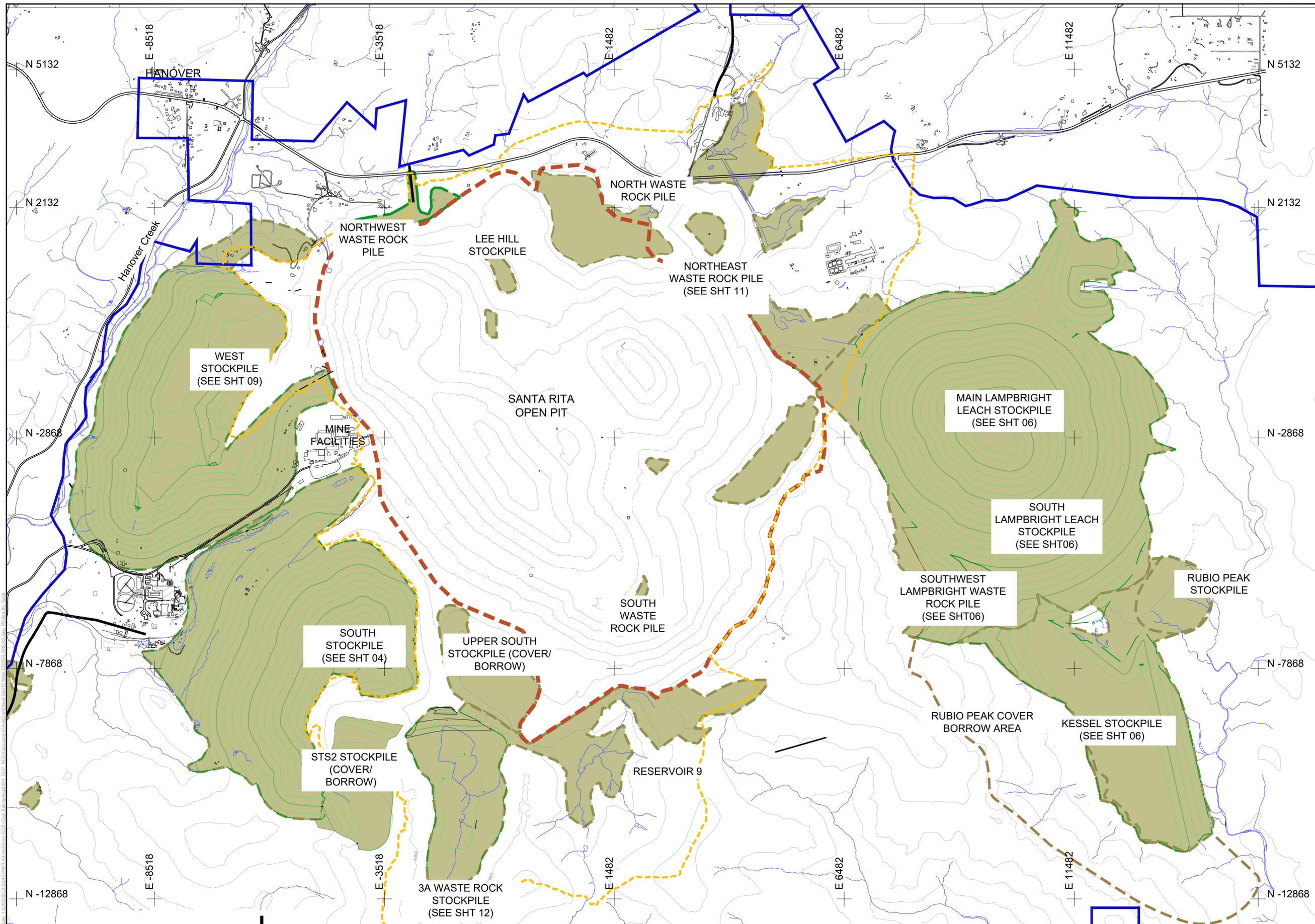
PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:

Freemport-McMoran

Date: 12/1/2025 3:27:52 PM By: Chino/Chino/CCP/Coal/Estimate/2025_CCP_REC/Chino/Reclaim/Chino/Check/Section/14_TYPICAL_SECTIONS.dwg Plotter: Ely_South



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE
- CROSS SECTION DESIGNATION
- S-1
- 006
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 1000
SCALE IN FEET
CONTOUR INTERVAL = 20' MAJ 50' MIN
COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
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PROJECT	200430-001
TASK NUMBER	02
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CHECKED BY	JC

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

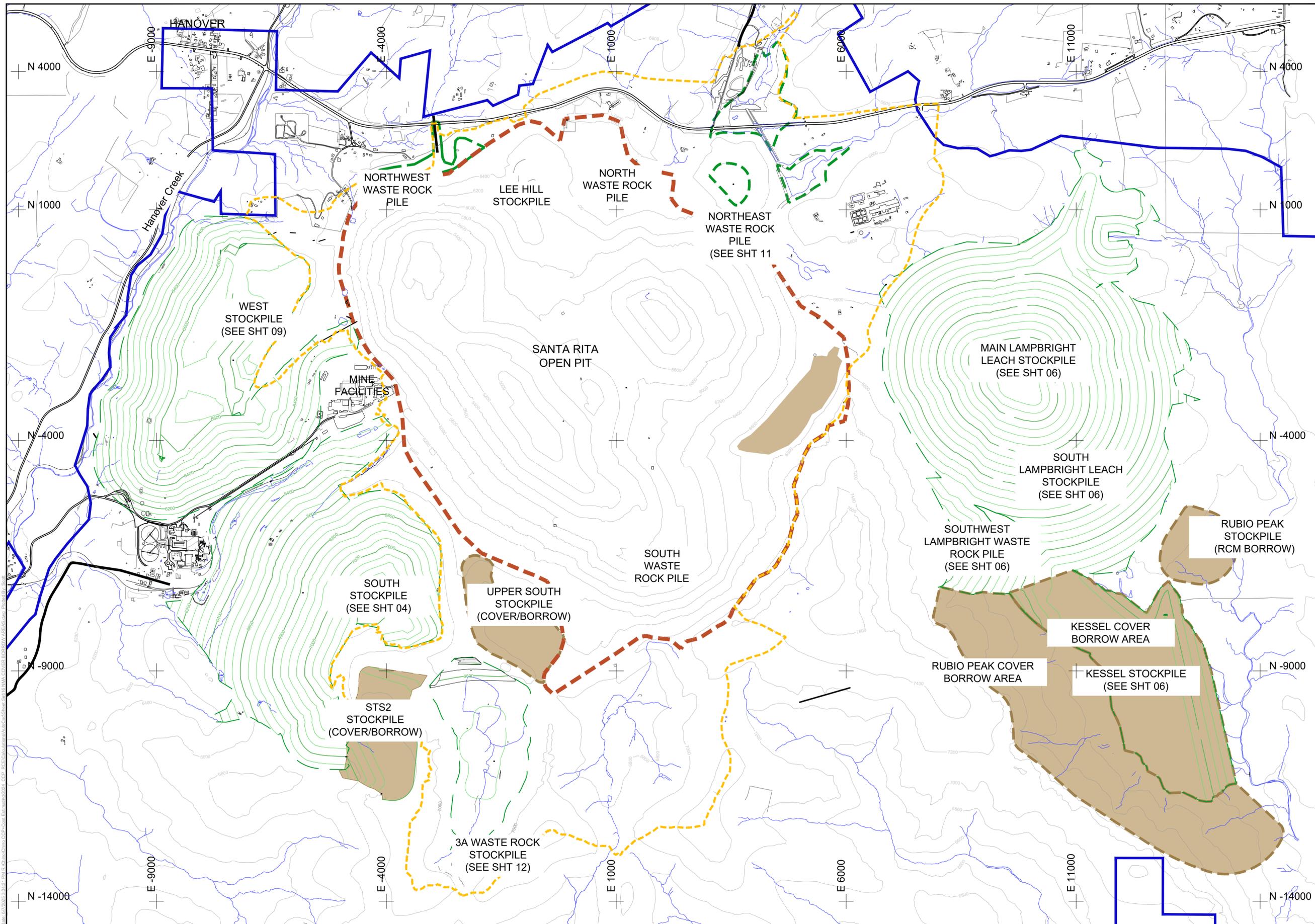
NMA COVER AREAS

SHEET NUMBER: 15 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:
Freeport-McMoRan



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

- S-1
- 006
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 1000
SCALE IN FEET

CONTOUR INTERVAL = 200' MAJ
50' MIN

COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

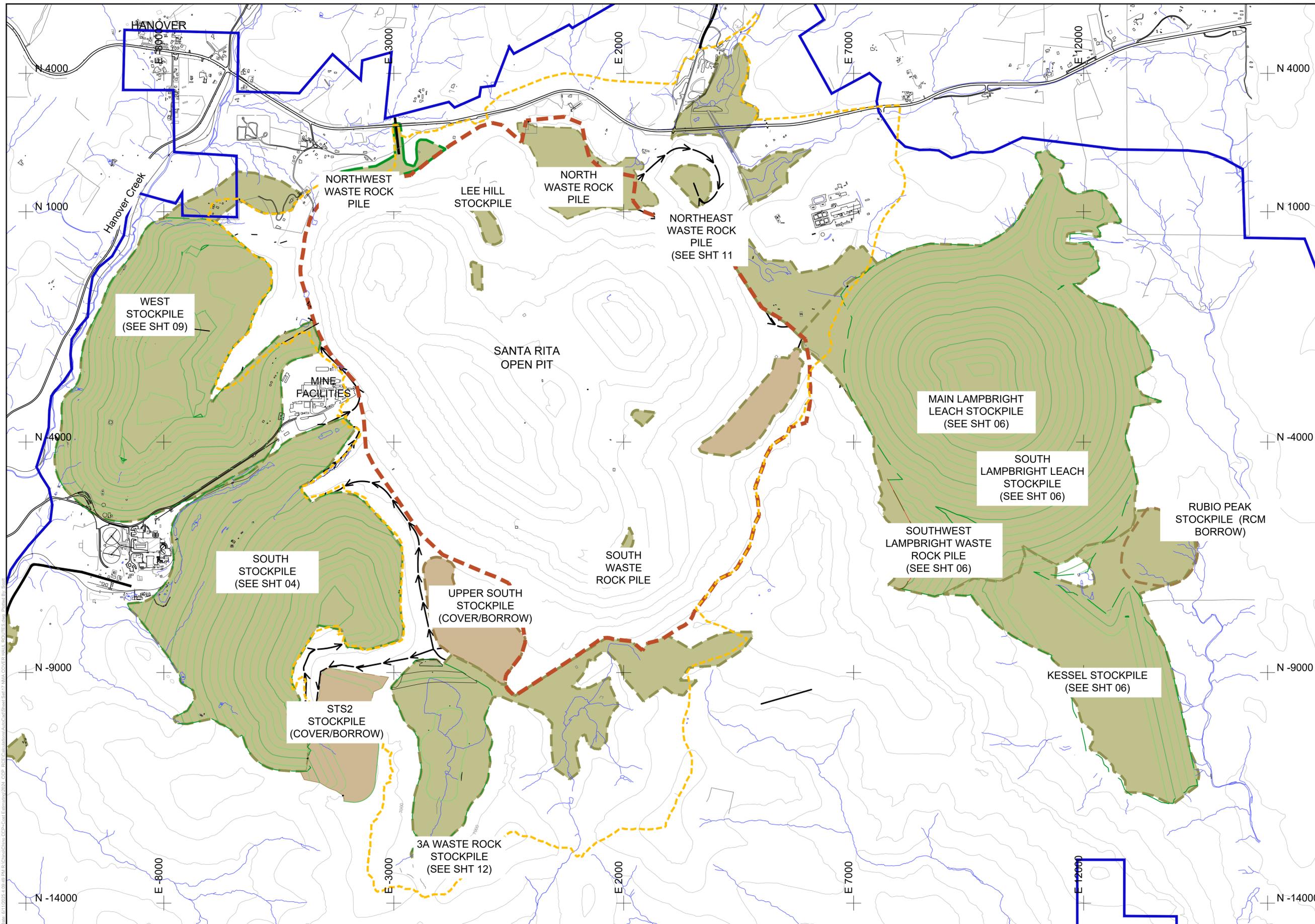
NMA COVER BORROW AREAS

SHEET NUMBER: 16 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:
Freeport-McMoRan



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE
- CROSS SECTION DESIGNATION
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 1000
SCALE IN FEET
CONTOUR INTERVAL = 20' MAJ 50' MIN
COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

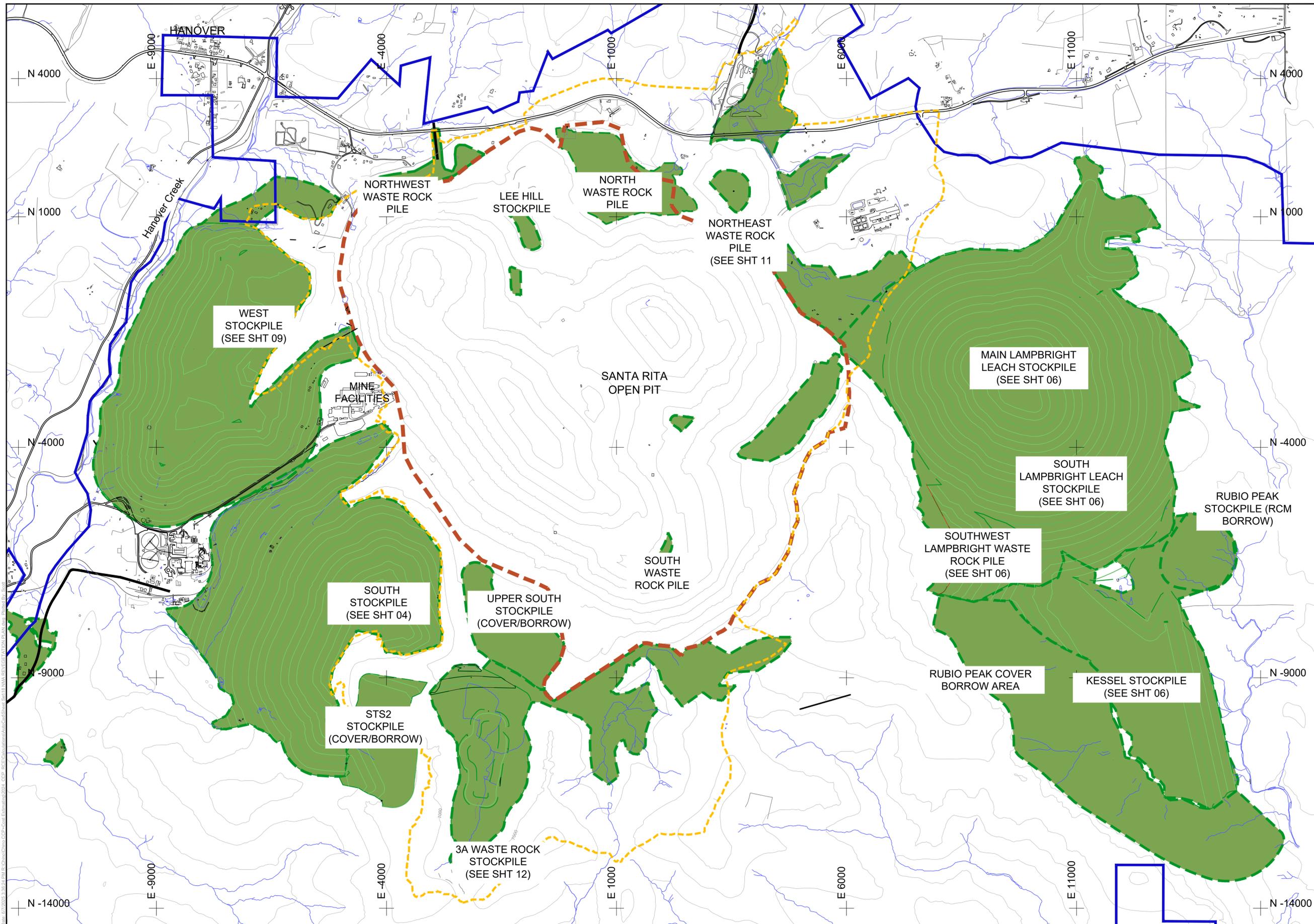
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1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

NMA COVER HAUL ROUTES

SHEET NUMBER:	17	REVISION NUMBER:	3
PREPARED BY:	TELESTO SOLUTIONS INCORPORATED		
PREPARED FOR:	FREEPORT-MCMORAN		



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE
- CROSS SECTION DESIGNATION
- S-1
- 006
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 1000
SCALE IN FEET

CONTOUR INTERVAL = 20' MAJ
50' MIN

COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
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PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

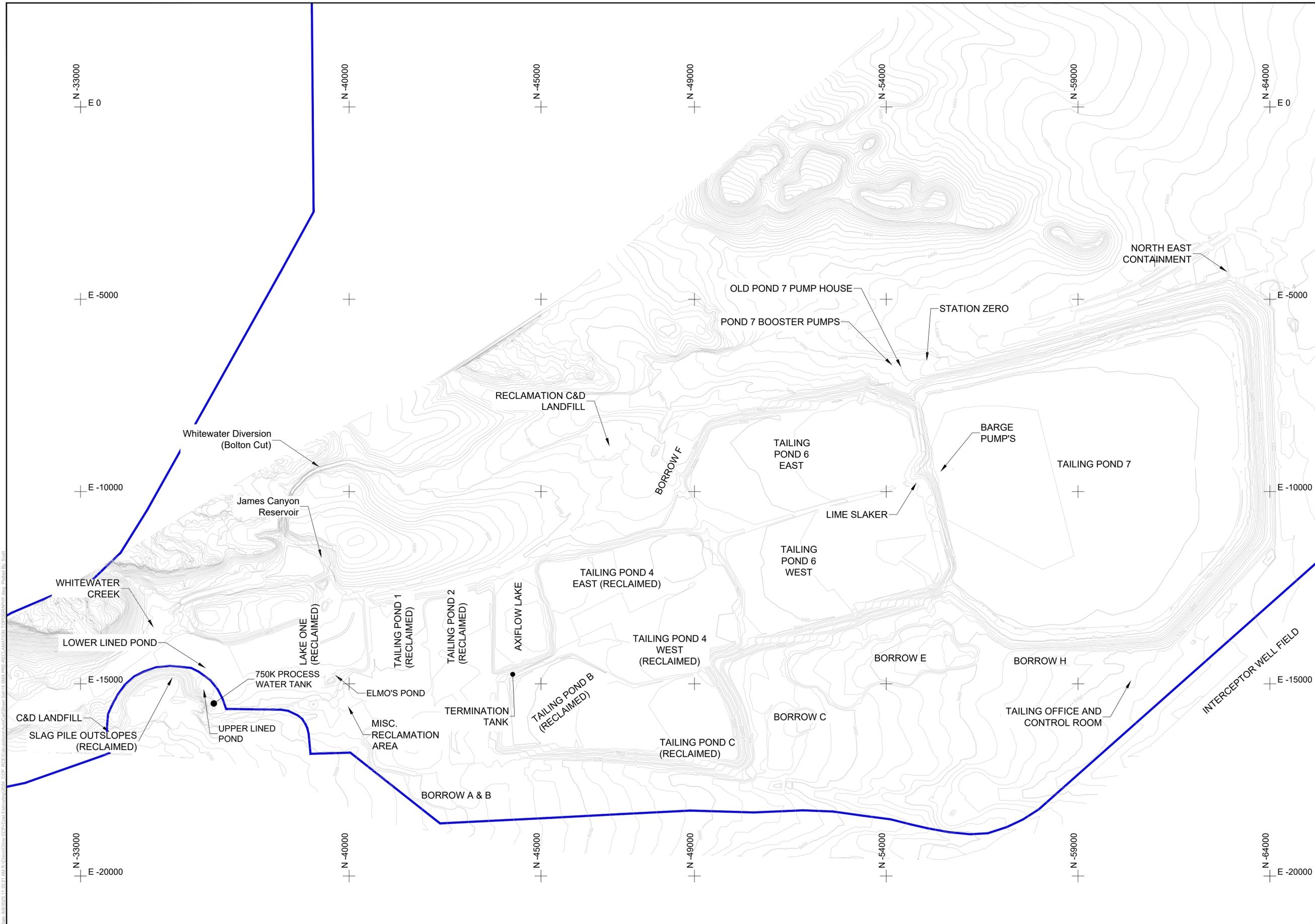
NMA REVEGETATION PLAN

SHEET NUMBER: 18 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:
Freeport-McMoRan



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE
- CROSS SECTION DESIGNATION
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 1200
SCALE IN FEET

CONTOUR INTERVAL = 5' MAJ
10' MIN
COORDINATE SYSTEM
CHINO LOCAL MINE

DRAFT

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC
DRAWN BY	

CHINO MINE AREA RECLAMATION

SMA PRE-RECLAMATION TOPOGRAPHY

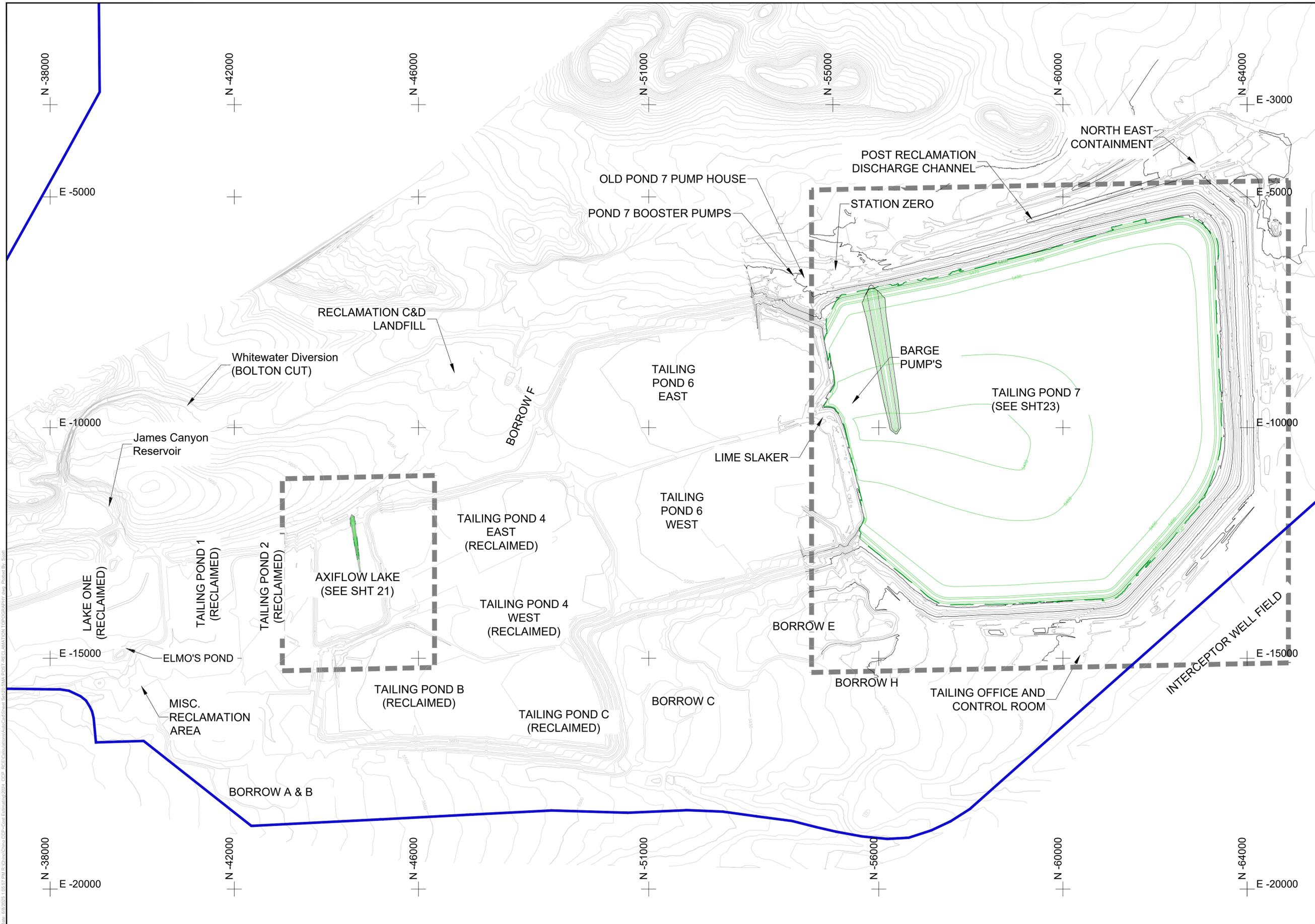
SHEET NUMBER: 19 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:

Freeport-McMoRan



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

S-1

006

SHEET NUMBER

REFERENCE

1. END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 1000
SCALE IN FEET

COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION

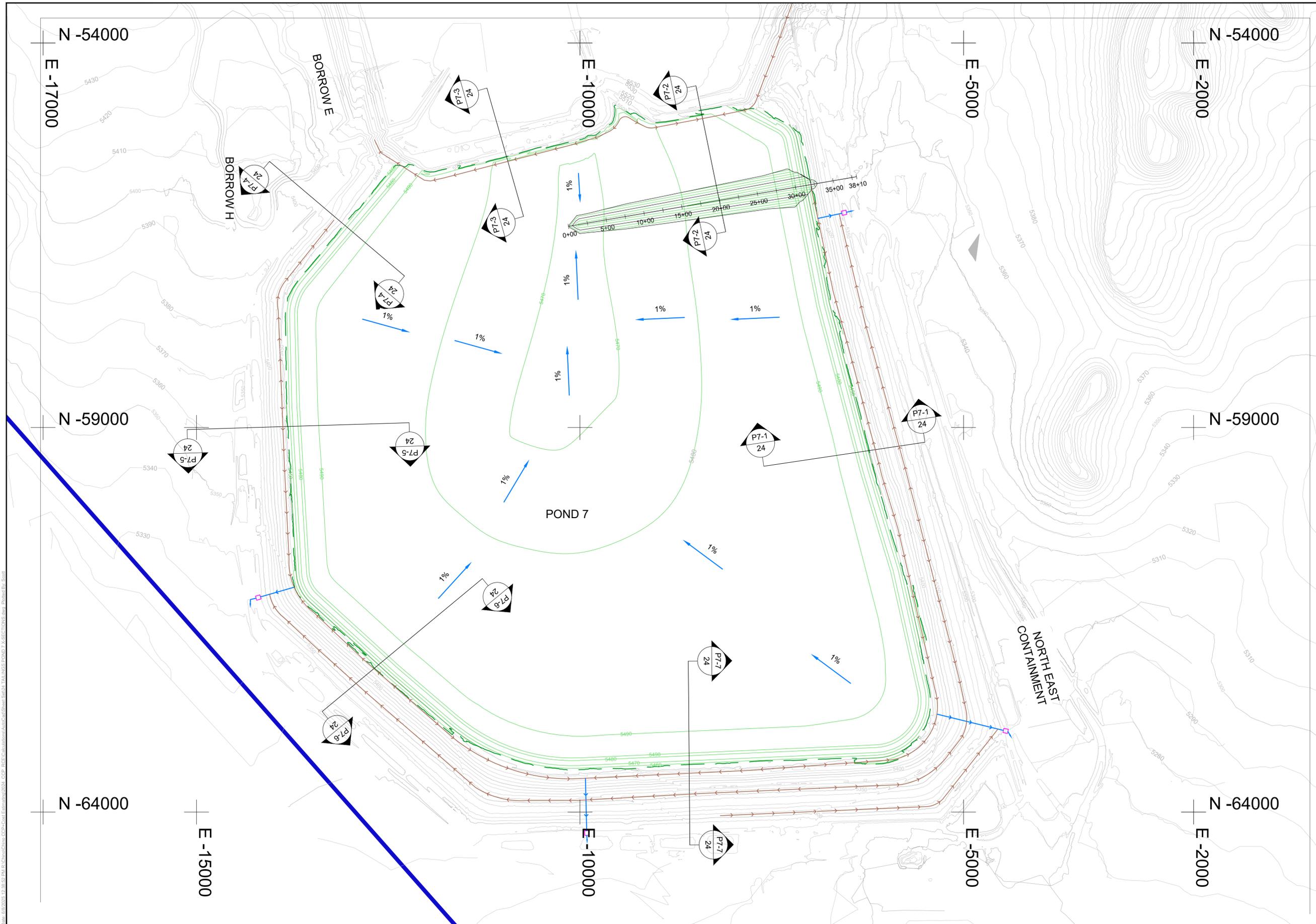
SMA POST-RECLAMATION TOPOGRAPHY

SHEET NUMBER: 20 REVISION NUMBER: 3

PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:
Freeport-McMoRan



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
- BUILDING
- RECLAMATION AREAS
- PIT WAIVER AREA
- BENCH CHANNEL
- DOWN DRAIN
- ENERGY DISSIPATER
- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

- S-1
- 006
- SHEET NUMBER

REFERENCE

- END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 600
SCALE IN FEET
CONTOUR INTERVAL = 5' MAJ
10' MIN
COORDINATE SYSTEM
CHINO LOCAL MINE

DRAFT

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
3	AGENCY REVIEW	06/09/25	SN	WN
4	AGENCY REVIEW	12/15/25	SZ	TS

DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC
DRAWN BY	

CHINO MINE AREA RECLAMATION

**TAILINGS POND 7
GRADING AND
DRAINAGE PLAN**

SHEET NUMBER:	23	REVISION NUMBER:	3
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PREPARED BY:

TELESTO
SOLUTIONS INCORPORATED

PREPARED FOR:

Freeport-McMoRan



LEGEND & NOTES

- PERMIT BOUNDARY
- OPSDA 2030
- EOY 2030 CONTOURS
- PAVED ROAD
- GRAVEL ROAD
- EXISTING DRAINAGE
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- BENCH CHANNEL
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- SLUDGE/SALT DISPOSAL AREA
- HAUL ROUTES
- BORROW
- COVER
- REVEGETATION

PROFILE/SECTION

- EXISTING GROUND
- RECLAMATION GRADE

CROSS SECTION DESIGNATION

S-1

SHEET NUMBER

006

REFERENCE

1. END OF YR 2030 TOPOGRAPHY SUPPLIED BY CHINO MINE PLANNING

0 1000
SCALE IN FEET

CONTOUR INTERVAL = 5' MAJ
10' MIN

COORDINATE SYSTEM
CHINO LOCAL MINE

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	CLIENT REVIEW	07/01/24	JC	WN
2	FOR SUBMITTAL	10/25/24	SN	JC
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DATE	12/1/25
PROJECT	200430-001
TASK NUMBER	02
DRAWN BY	SN
PROJECT ENGINEER	WN
CHECKED BY	JC

CHINO MINE AREA RECLAMATION	
SMA REVEGETATION PLAN	
SHEET NUMBER:	REVISION NUMBER:
28	3
PREPARED BY:	
TELESTO SOLUTIONS INCORPORATED	
PREPARED FOR:	
Freeport-McMoRan	

Appendix E – Tables

Appendix E: Material Handling Plan Updated Tables

Table 1 Reclamation Cover Material Requirements for the North Mine Area

Stockpile	Area (ac)	Required RCM Vol. (CY)	Cover Source
South Stockpile	610	2,952,400	STS2/Upper South
West Stockpile	522	2,526,500	Upper South
3A Stockpile	215	1,040,600	Upper South
Santa Rita Stockpile (Top Area)	71	343,600	Upper South
Northwest Stockpile	16	77,400	Upper South
Lee Hill Stockpile (Top Area)	32	154,900	Upper South
North Stockpile	76	367,800	Upper South
Northeast Stockpile (Top Area)	12	58,100	Upper South
Lampbright Stockpiles ¹	928	4,491,500	Rubio Peak
Kessel Stockpile -5 year	243	1,176,100	Rubio Peak
Dams and Reservoirs	24	116,200	Upper South
Miscellaneous NMA	77	372,700	Upper South
Total:	2,826	13,677,800	

¹Lampbright Stockpiles includes the Main and South Lampbright Leach Stockpiles

Appendix E: Material Handling Plan Updated Tables

Table 2 Reclamation Cover Material Balance for the North Mine Area

Borrow Source	Available (CY)	RCM Used in Reclamation Plan (CY)
STS2	2,830,500	2,830,500
Upper South	12,967,600	5,179,700
Rubio Peak Cover Material	9,207,000	3,921,000
Rubio Peak RCM Stockpile	1,746,600	1,746,600
Total Available RCM (CY)		26,751,700
Total Required RCM (CY)		13,677,800
Excess RCM (CY)		13,073,900

Appendix E – Calculation Set



Calculation Documentation

Problem Statement:

In 2024, Freeport-McMoRan Chino Mines Company (Chino) submitted an updated Material Handling Plan (MHP) to the New Mexico Mining and Minerals Division (MMD) as part of the 2024 update on the Chino Closure and Closeout Plan (CCP), pursuant to Permit GR009RE 18-1, Conditions U and V. As part of this update, Chino plans to reduce the frequency of blast hole paste pH sampling from 25% to 10% of blast holes for material designated for reclamation. To justify this change, Telesto Solutions Inc (Telesto) provided a cumulative distribution function (CDF) graph comparing sample populations for percent sulfur less than or equal to 0.15% to illustrate there is little difference in the distribution of samples between a 10% and 25% random sampling set of the population. MMD requested additional information to elaborate on the previously submitted Figure 1 and requested proof of a strong correlation between samples with less than 0.15% sulfur and a paste pH greater than 5.

Objectives:

1. Elaborate on the CDF plot, as shown in Figure 1 of the MHP update
2. Provide data and figures supporting the claim that samples with <0.15 % sulfur generally have a paste pH > 5

Approach:

1. Plot as a CDF all data
2. Plot as a CDF 25% of the data randomly selected over multiple iterations
3. Plot as a CDF 10% of the data randomly selected over multiple iterations
4. Plot as a CDF Paste pH data from the 2006 MHP
5. Plot synthetic data set for Chino paste pH CDF and analyze different sample frequencies

Data and Assumptions:

1. Chino blast hole data (provided by Chino)
2. Hanover Mountain blast hole data (provided by Chino)
3. 2006 Chino MHP

Calculation

1. Sort all data by % Sulfur, low to high
2. Assign sequential number (count) to each data point
3. Assign a cumulative percentage by the following formula:

$$\text{Cumulative \%} = \text{count} / (\text{total count} + 1)$$

4. Create a graph with % S on the x-axis, and cumulative percent on the y-axis

Calculation cont

Calculation Documentation

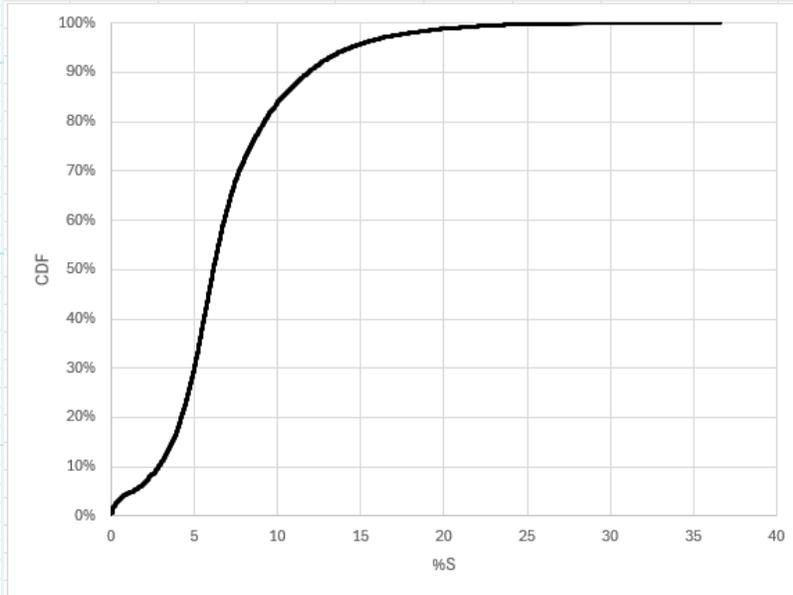
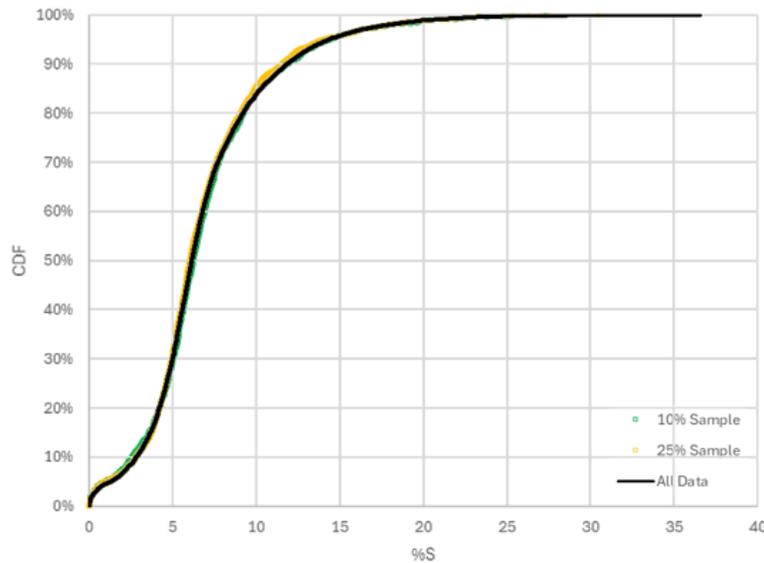


Figure 1: CDF plot of all data



	Data	10%	25%
Arith Ave	6.873852	6.893134	6.766516
Arith std	3.939701	4.02089	3.872555
geomean	5.432989	5.336558	5.305782
geostd	2.47264	2.624565	2.537275
median	6.15	6.25	6.045
Max	36.56	34.06	30.48
Min	0.01	0.01	0.01
1% CI	0.09377	0.302664	0.184344
n	11,712	1171	2928

Figure 2: CDF plot of all data, 10% of data, and 25% of data

5. Repeat steps 1 – 4, applied to 25% and 10% of samples respectively
6. Repeat Steps 1 – 5, applied to data with <0.15% sulfur
7. Repeat with another set of random samples for 4 additional iterations

Calculation Documentation

Calculation cont

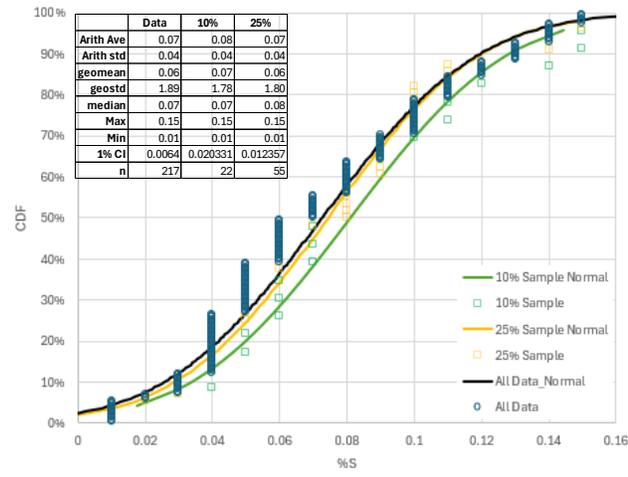
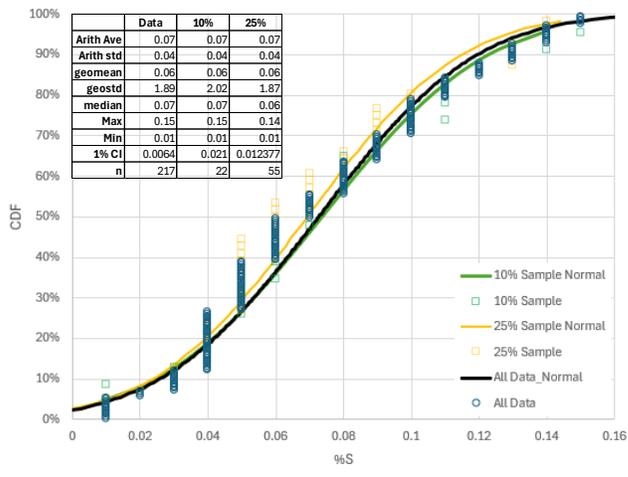
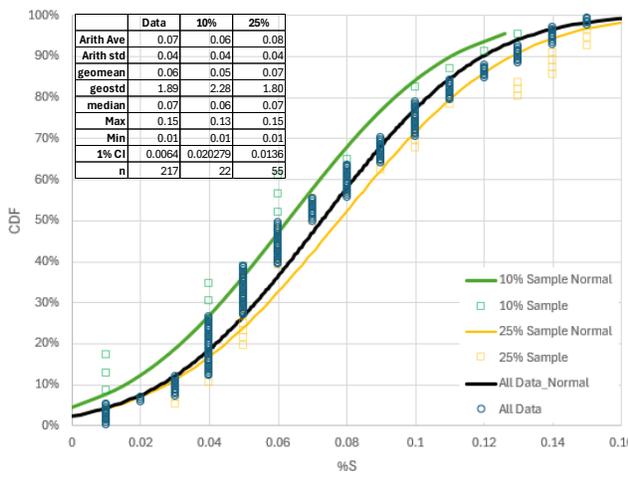
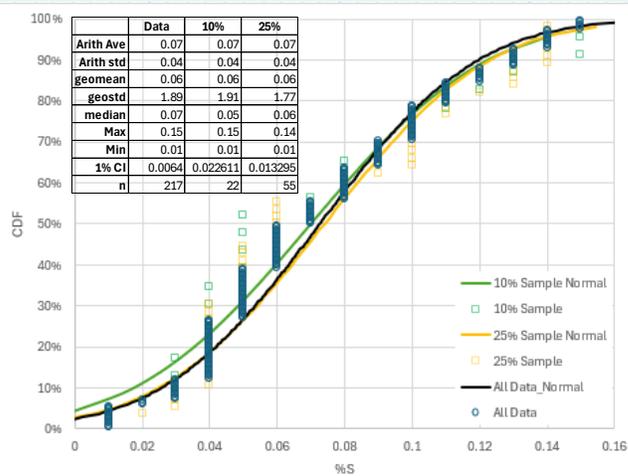
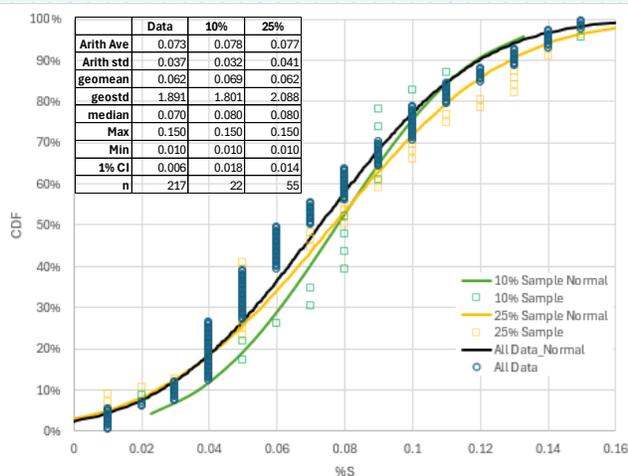


Figure 3: <0.15% Sulfur CDF plots across 5 iterations of randomized data

Calculation Documentation

Calculation cont

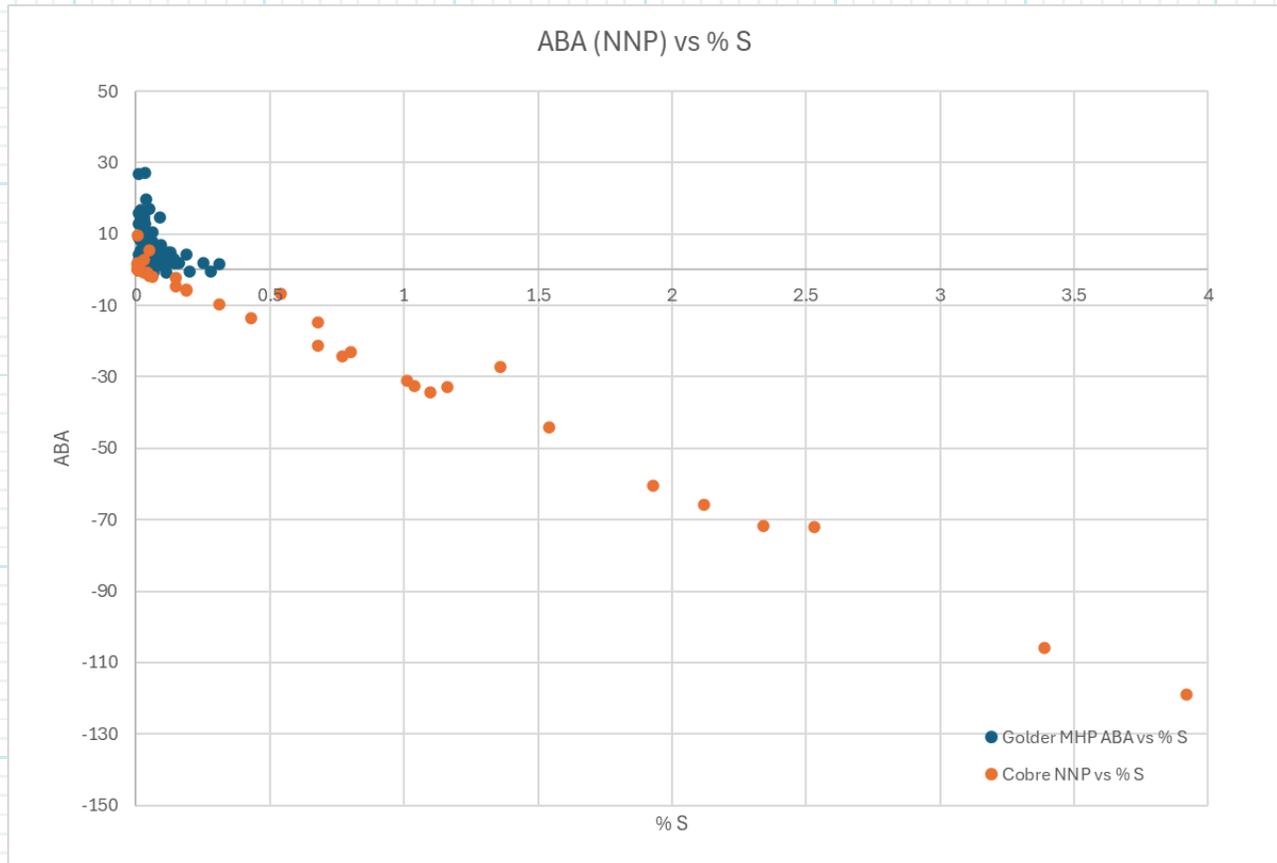


Figure 4: Sulfur % vs paste pH plot, from Hanover Mountain blast hole samples and Golder 2006 MHP

8. Figure 4 illustrates the relationship between percent sulfur and net neutralizing potential (NNP; net acid–base accounting as presented in the original RCM characterization in Golder's 2006 Material Handling Plan) for all available data from the Chino and Continental mines. All samples with sulfur contents below 0.15 percent always exhibit positive NNP values, indicating net neutralization capacity.

Calculation Documentation

Calculation cont

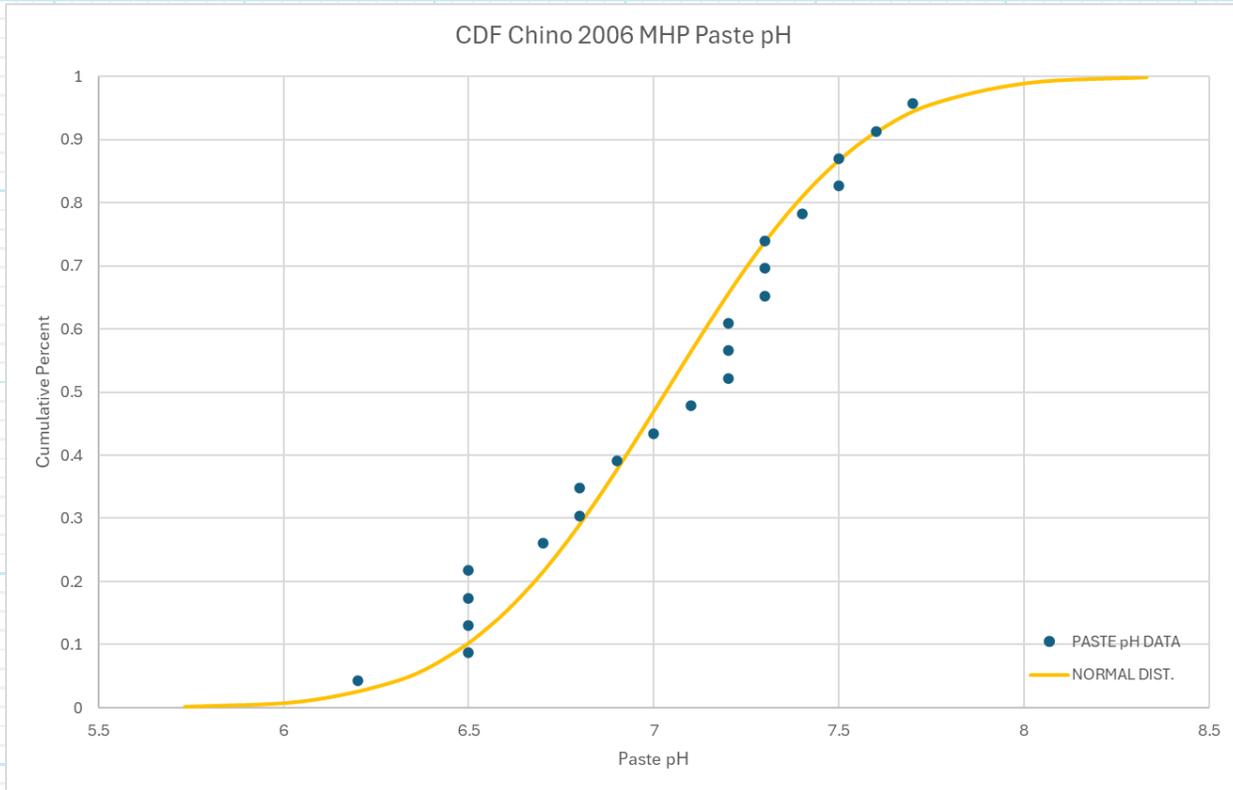


Figure 5: CDF of Paste pH data from the 2006 Golder MHP

9. Figure 5 presents the distribution of paste pH values for samples with sulfur contents less than 0.15 percent from the original cover characterization dataset (Golder, 2006) fitted with a normal distribution. No paste pH values below 5 are observed in this population, indicating that the probability of paste pH less than 5 for material meeting the sulfur criterion is extremely low.

Calculation Documentation

Calculation cont

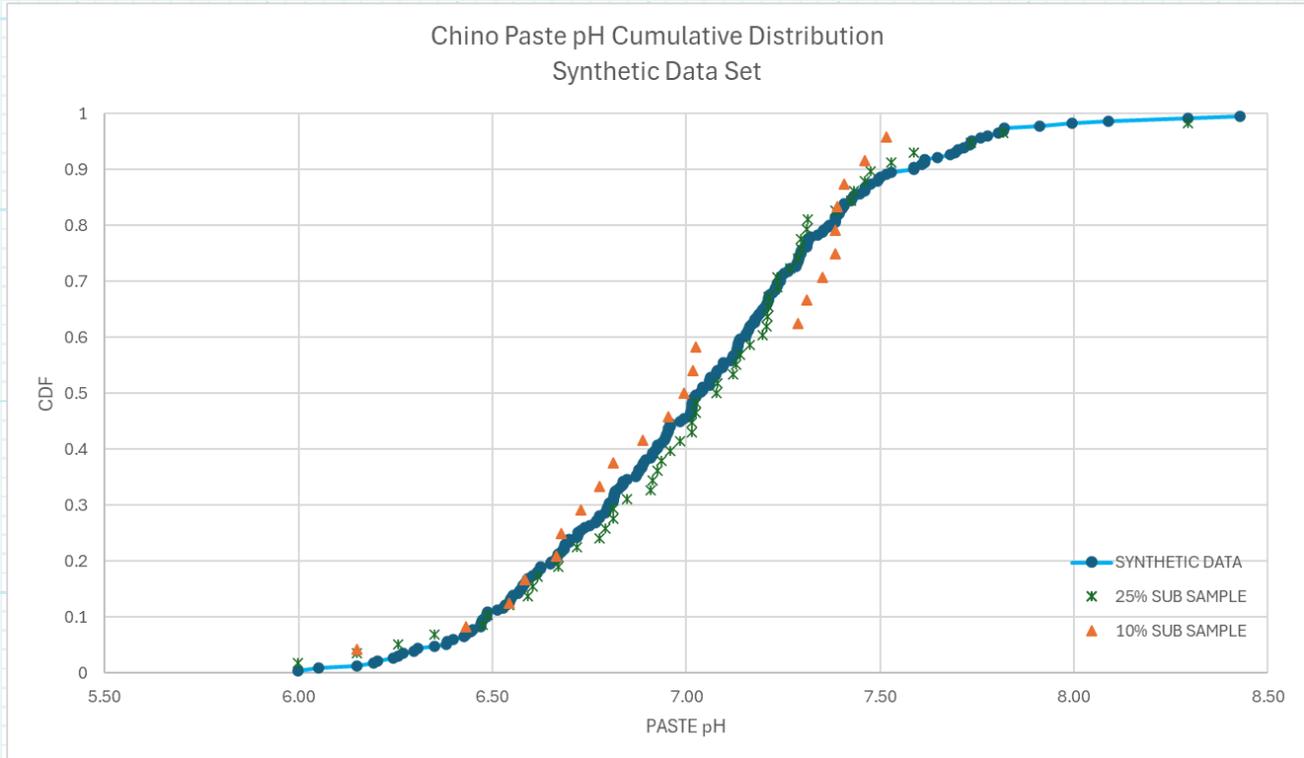


Figure 6: Synthetic dataset with 25% and 10% random sub-samples

10. To evaluate the effects of reduced paste pH sampling frequency, the paste pH population shown in Figure 5 was randomly sampled 230 times, corresponding to the total number of blasthole samples, and then resampled 57 and 23 times, representing 25% and 10% reduced sampling frequencies, respectively. The resulting distributions shown in Figure 6 are statistically consistent and show no occurrence of paste pH values below 5. Accordingly, reducing the frequency of paste pH sampling does not increase the likelihood of failing to identify material with paste pH less than 5

Conclusions

1. Decreasing sampling frequency from 25% to 10% shows little statistical difference in the median sulfur content of blastholes sampled.
2. For blastholes with sulfur content below 0.15% sulfur content, the median sulfur content shows little change between a 25% and 10% sampling frequency
3. All samples containing less than or equal to 0.15% sulfur have a paste pH greater than 5
4. Reducing the sampling frequency from 1-in-4 to 1-in-10 will have little effect on testing to verify that the relationship between pH and percent sulfur holds.



Job No: 200450-007-01 Client: FMI Chino Page 7 of 7
Task: Chino CCP MHP Sulfur Computed By: K Stafford Date: 12/19/25
Content Statistics Checked By: S. Zeman Date: 12/19/25

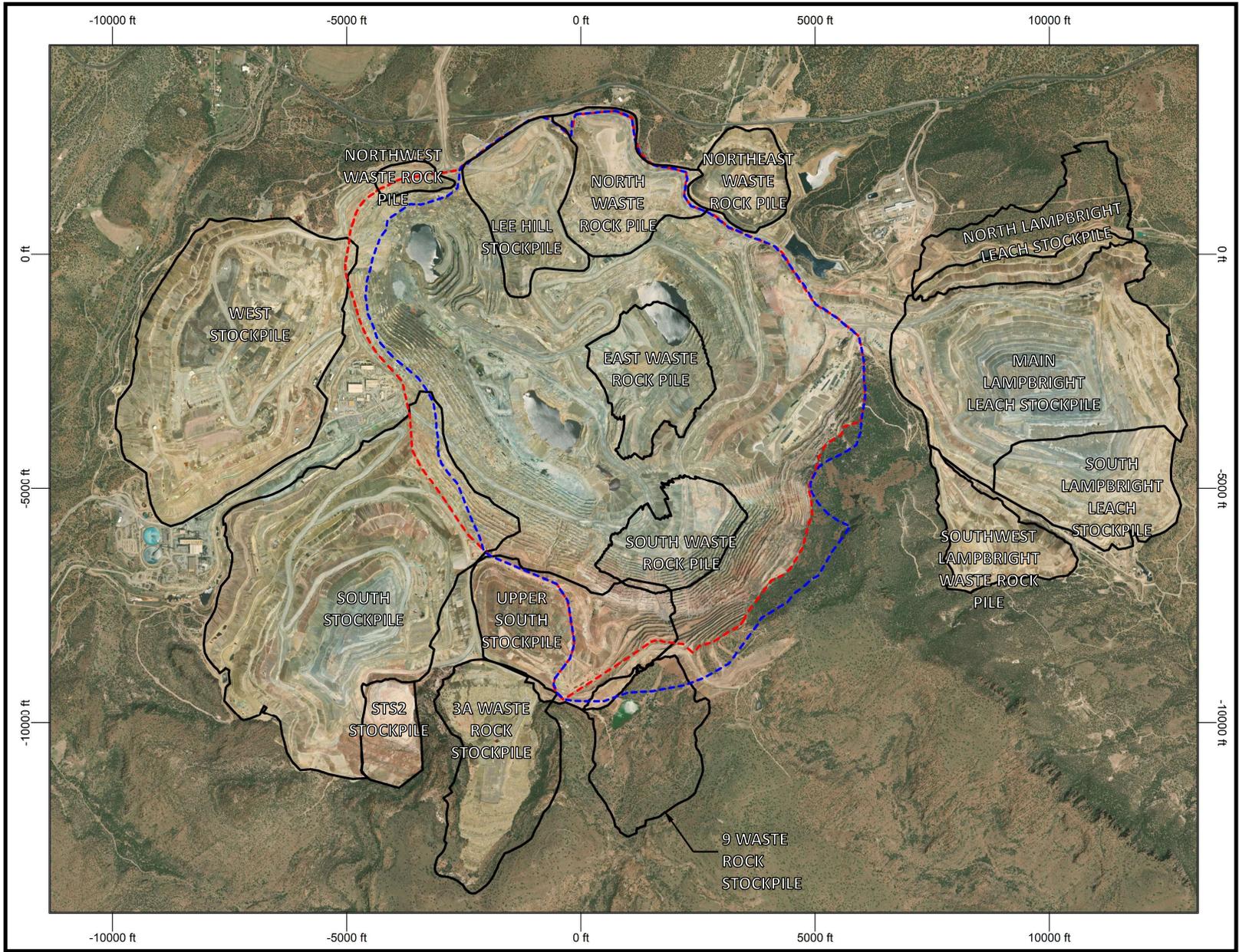
Calculation Documentation

References:

Golder, 2006. *Material Handling Plan South Pit Area. Submitted to Chino Mines Company, Hurley, New Mexico*

Appendix G

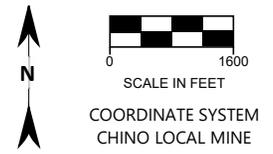
NMA Pit Boundary / Waiver



NOTES:

AERIAL IMAGERY: CHINO MINES SATELLITE SURVEY, APRIL 21, 2024

- FACILITY BOUNDARY
- - - 2003 PIT WAIVER
- - - 2030 PIT BOUNDARY/WAIVER



**NMA
PIT BOUNDARY/WAIVER**

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PREPARED FOR:
Freeport-McMoRan