

# MMD Public Hearing on Chino CCP

Gila Resources Information Project

April 21, 2026



# Other Relevant Permits

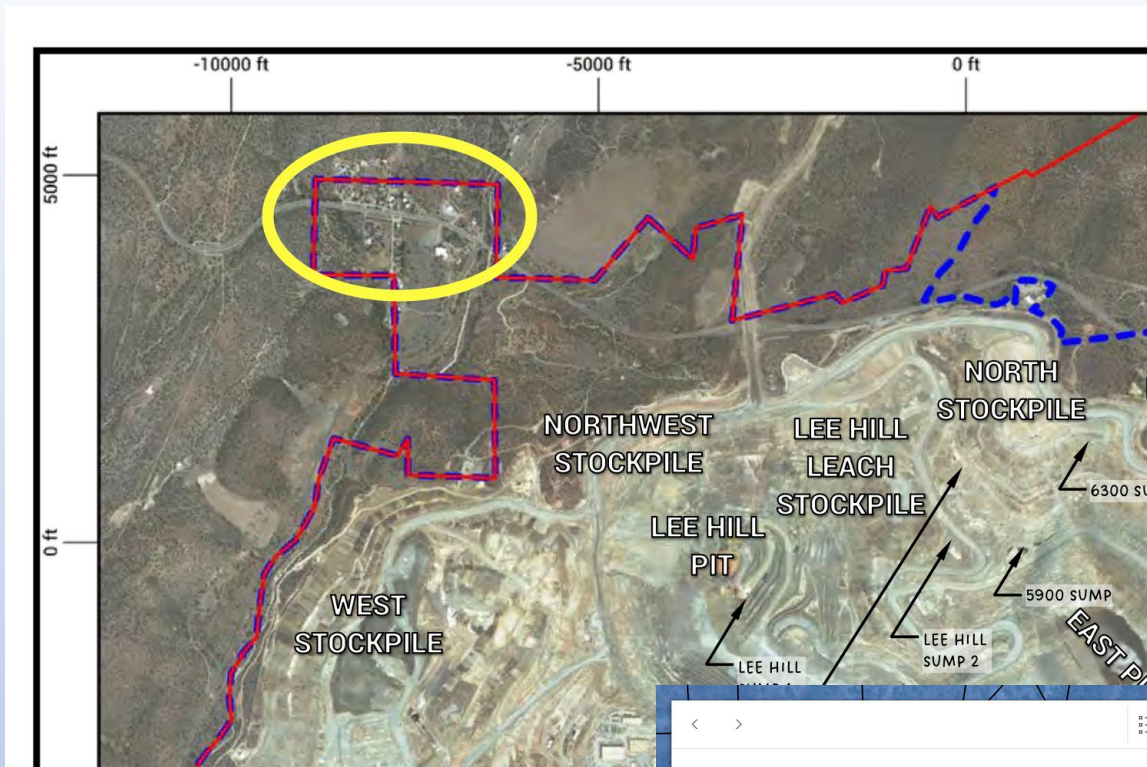
- BLM – What's the status of the revised Mine Plan of Operations and NEPA process to account for new Kessell Stockpile and other changes?
- NMED – Supplemental Discharge Permit for Closure - DP-1340 to protect groundwater.
- NMED – Ensure conditions are in DP-1340 for surface water quality protection until state permitting program is operational.



# Permit Boundary and Pit Waiver

- **Private land within permit boundary** – Do these landowners know that their land is within the permit boundary of the mine? Are there landowner agreements with private landowners? What are the proposed permitted activities that will take place in this area of the mine that could encroach on private property and Hwy 152?
- **Require updated pit waiver map annually** - Pit waiver area has changed significantly since 2003. Need updated maps every year to track with CCP.





Permit Boundary Map  
from Chino Mine CCP

1 of 2

Grant\_Parcel\_GRIP\_NAD83z12n\_20260210  
: 3070100411423

Table Edit Get directions Zoom to

|            |                                |
|------------|--------------------------------|
| OWNER      | HINOJOSA EMILIA SALAIZ KELLY H |
| PAGE       | 6,455                          |
| PARCELNB   | 3070100411423                  |
| PARCESEQ   |                                |
| PLATTEDL_1 | 4                              |
| PLATTEDL_3 | T & M                          |
| PLATTEDL_4 |                                |
| PLATTEDLEG | 5                              |
| PLSSID     |                                |
| PrincipalM |                                |
| Public     | PRIVATE                        |



Grant County Parcel Map

# Stockpile Reclamation

- **Reservoir 9 Area** – support inclusion of Reclamation Cost Estimate (RCE) for Reservoir 9 stockpile reclamation as highest cost reclamation option to ensure there is sufficient financial assurance for reclamation of this area.
- **Require test plots for Rubio Peak/Kessell material** before approval as Reclamation Cover Material (RCM). Need to demonstrate that this material will successfully grow vegetation and establish a Self-Sustaining Ecosystem
- **Lining of Kessell Stockpile** – Would facilitate “Leach to the Last Drop” and protect groundwater.



# Windblown Tailings Reclamation

- Removal of 6 inches of windblown tailings downwind of Pond 7 tailings facility
  - How was cleanup area defined?
  - What is acreage?
  - What are the contaminants?
  - How will the area be reclaimed? How will it be revegetated?



# Water Treatment - Questions

- What is the current length of time for a full circuit of leachate through leach stockpiles? How long will it take to drain leach stockpiles after closure?
- What is the volume of salt that will be generated by evaporative treatment over time?
- What is the capacity of the salt storage facility within the pit? Is it sufficient? What are alternative locations?
- How will fugitive dust from salt storage be controlled?
- Interceptor wells for groundwater in pit – what's the contingency if this system doesn't work? How much water will need to be treated if interceptor system doesn't work?
- Dilution to meet standards – mixing low TDS water with treated water. How much dilution will need to occur?'
- How often does evaporation equipment need to be replaced?



# Water Treatment Costs

- Largest post-closure cost
- Water treatment will be required “in perpetuity” = beyond 100 years
- Capital replacement costs of water treatment system must be accounted for.



# Containment System

- Interceptor wells must operate in perpetuity to contain groundwater contamination on site.
- Make sure we have sufficient containment around Pond 7 – impacts to Apache Tejo area groundwater - part of Grant Co. Regional Water Supply Project.
- Need to include capital replacement costs in RCE and run NPV calculation for longer than 100 years.



# Monitoring

- Monitoring of surface water discharge to Whitewater Creek from water treatment facility
- GW monitoring – need more monitoring wells on west side of Pond 7 protect Apache Tejo wells



# Reclamation Cost Estimate (not available yet)

- **Indirect costs are underestimated** and do not reflect the US Forest Service *Training Guide for Reclamation Bond Estimation and Administration, for Mineral Plans of Operation Authorized and Administered Under 36 CFR 228A*, USDA Forest Service, Minerals and Geology Management, April 2004.
  - Forest Service recommends indirect costs as 38% - 108% of direct costs
  - Chino CCP (2020) - indirect costs of 30% are applied to the capital direct costs, and 17.5% indirect costs to the O&M direct costs
- **Include capital replacement costs** for water treatment facility and containment system



# Financial Assurance

- **NPV calculation** for long-term water treatment, monitoring, maintenance – Must prevent shift in long-term liability for reclamation and cleanup to the public to protect future generations.
  - Run calculation longer than 100 years to account for replacement costs of water treatment, monitoring, maintenance (e.g., containment system)
  - Use net discount rate less than 3% following MMD's guidance
- **Financial instruments**
  - No 3<sup>rd</sup> party guarantee = corporate guarantee = self-bonding
  - Approve less risky forms of FA – cash trust, letters of credit, surety bonds.



THANK YOU!

