

Technical Review Comments on
Permit Application for Tyrone Emma Project
New Mexico Mining and Minerals Division Public Hearing
Silver City, NM August 16, 2022

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On behalf of
Gila Resources Information Project (GRIP)



Tyrone Emma Project – Application and Review Status

1. Mining and Minerals Division has not determined application/Closure Closeout Plan (CCP) technically complete.
2. Environment Department Discharge Permit Application presently under review.
3. GRIP has not had opportunity to meet with FTMI and discuss CCP.
4. GRIP technical comments in development and final comments pending further review and discussion.

Recommend public comment period remain open until 30 days after CCP deemed technically complete.

Tyrone Emma Project – Impact on Local Communities

Section 69-36-5.B of the NM Mining Act. *The mining operation site assessment for new and existing mining operations shall describe in detail the mining operation's existing permits and regulatory requirements pursuant to the standards for mining operations pursuant to existing state and federal environmental standards and regulations. To the extent that they are applicable, the permit applicant may incorporate documents on file with state agencies. The mining operation site assessment shall include: (5) an analysis of the mining operation's impact on local communities; (underline added)*

NMAC 19.10.5.508.A. *Most Appropriate Technology and Best Management Practices requires that “The mining operation and the reclamation plan shall be designed and operated using the most appropriate technology and the best management practices.”*

Emma Mine non-water potential impacts on local residents and landowners

- Noise
- Lighting
- Dust
- Blasting
- Safety
- Overall well-being and way of life

Tyrone Emma Project

Other Questions, Comments and Recommendations

- Project duration, potential for further expansion, other projects in same vicinity
- Post-mining land use, open space – conservation easement
- Climate change and planning for extreme storm events
- Geochemistry and potential for metals leaching, waste management plan
- Conditionally exempt material
- Pit reclamation, pit lake sump, pit waiver
- Highwall stability/public safety
- Discharge Permit – still under review, comments pending
- Financial Assurance – long term (100-yr NPV), continue reduction of corporate guarantee to \$0