

# 2015 Board of Directors:

Bruce Ashburn

Dan Cook
Prudential Silver City
Properties

Dave Thomas

WNM Communications

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Lori Ann Bonomo
Carson Insurance Agency

Melanie Reese First American Bank

Tony Trujillo
Freeport-McMoRan

William Knuttinen
Morones & Knuttinen, LLC

### **Chamber Staff:**

Scott C. Terry
President - CEO

September 22, 2015

Fernando Martinez Director, Mining and Minerals Division Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Public Comment, Permit GR007RE, Little Rock Mine, Revision 14-1

Mr. Martinez:

I am writing on behalf of the Silver City Grant County Chamber of Commerce to urge the Mining and Minerals Division to approve the application for a permit revision to allow for expansion of the Little Rock Mine here in Grant County. The Little Rock Mine supplies ore to the Tyrone Mine, and its expansion and continued operation is important to the economic well-being of Silver City and Grant County.

The positive influence Freeport-McMoRan has on Grant County's economy, and New Mexico as a whole, cannot be overstated. Last year, the Tyrone mine and the Chino mine together generated an estimated \$170.4 million in economic benefits for Grant County and approximately \$443.7 million for the State of New Mexico. Together with direct economic benefits, an estimated \$26.6M in spending by employees, as well as \$6.1M in additional tax revenue, \$3.2M in spending from pension income and \$3.2M in vendor purchases had a positive ripple effect that contributed over \$39.1M in indirect economic benefits to the Grant County economy. As the largest employer in Grant County and one of its largest purchasers of local goods and services, our local businesses and residents all benefit.

As you are aware, Freeport-McMoRan recently announced some changes in its mining operations at Chino and Tyrone, which contained both good news and bad news. On the one hand, the good news was that the Chino and Tyrone

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operations will stay in business and will maintain a great number of jobs in Grant County, which will continue to have a significant positive economic impact on our communities. On the other hand, the bad news was that there will inevitably be some layoffs announced and this is always difficult to deal with -- especially for those

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workers and their families that have been directly impacted. The negative impact of losing those 210 jobs will also be felt by the communities and, in turn, by local businesses that depend on customers employed by Freeport-McMoRan. Expansion of the Little Rock Mine obviously is important to the continued operation of the Tyrone Mine, and Freeport-McMoRan needs timely approvals of its permits so that its operations can continue to support employment here in Grant County.

As we have watched the reclamation of the old tailings and other parts of the Tyrone and Chino operations, it has become evident that Freeport-McMoRan is committed to reclaiming its mines in a careful and responsible manner that will protect our lands and water for future generations. The proposed permit changes will ensure that the Little Rock Mine will be responsibly reclaimed. Therefore, as president and chief executive officer of the Silver City Grant County Chamber of Commerce, I wish to state for the record that our organization stands strongly in support of the Little Rock expansion, GR007RE Little Rock Mine, Revision 14-1.

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Respectfully,

Scott C. Terry

President and CEO

Silver City Grant County Chamber of Commerce

September 23, 2015

Fernando Martinez, Director Mining and Minerals Division New Mexico Energy, Minerals, and Natural Resources Department 1220 South St. Francis Dr. Santa Fe, NM 87505

**RE:** Public Comments on Application to Revise Little Rock Mine Permit GR007RE to Include Pit Expansion and Update to Closure-Closeout Plan

Dear Mr. Martinez:

Pursuant to 19.10.9.904 NMAC, Gila Resources Information Project (GRIP) is submitting public comments to you on Freeport-McMoRan's application to Mining and Minerals Division for a permit to expand the Little Rock mine and update the associated closure-closeout plan under Permit GR007RE. These are in addition to our comments provided at the public hearing on September 2, 2015 in Silver City, NM.

Because GRIP's consultant, Steve Blodgett of J. Kuipers Associates, has had a medical emergency we are unable to provide for you at this time the following technical report in support of the comments outlined below: "Comments on Little Rock Mine Expansion and Updated Closure/Closeout Plan" by Steve Blodgett of J. Kuipers Associates, September 2015. As soon as this report is finalized, we will forward it to you.

1) Freeport-McMoRan and the NM Mining and Minerals Division should explore additional partial backfill options that would avoid "perpetual care" of a pit lake for surface water quality and wildlife protection.

Although Freeport says that there is low acid-generating potential and sufficient neutralizing capacity to prevent an acidic lake from forming at Little Rock, extensive experience at copper mines around the world indicates that most pit lakes in sulfide rocks become acidic over time.

According to 19.10.5.508 NMAC, "the mining operation and the reclamation plan shall be designed and operated using the most appropriate technology and the best management practices." Creation of pit lakes that will require monitoring and treatment in perpetuity is not a best management practice.

Additionally, since the post-mining land use for the pit lake is proposed as wildlife habitat, attracting wildlife to a potentially toxic water body is not allowed under the Mining Act.

Freeport should consider additional reclamation alternatives that avoid creation of a pit lake that would require monitoring and treatment *in perpetuity*.

2) The NM Mining and Minerals Division should strictly enforce the revegetation standards outlined in the Mining Act regulations to ensure that the cover material used at the Little Rock mine will sufficiently reclaim disturbed lands and create a self-sustaining ecosystem.

The NM Mining and Minerals Division has not yet approved the cover material that Freeport proposes to use to reclaim stockpiles at the Little Rock mine. The company has not demonstrated that the coarse rock material called "leach cap" will meet reclamation requirements to control erosion, prevent release of acid or other toxic substances, and support plant growth sufficient to create a "self-sustaining ecosystem," the standard mandated in the NM Mining Act and evaluated according to metrics outlined in 19.10.5.508 E(1) and E(2) NMAC.

3) GRIP is concerned that the current test plot study is poorly designed to adequately assess the use of leach cap as a cover material at Little Rock.

For example, the only material being tested at the 7A Stockpile and USNR sites is leach cap. In a statistically sound scientific design, the Little Rock leach cap material would be compared to Gila Conglomerate, which has been widely (and successfully) used for reclamation coversoil at Tyrone. In addition, various soil amendments (e.g., compost, mulch, fertilizer) would also be tested. A scientific test plot design would include three different thicknesses of Little Rock leach cap, three different thicknesses of Gila Conglomerate, a control plot with no coversoil, and plots with different soil amendments added to both the leach cap material and the Gila Conglomerate. If the final grading of reclaimed slopes calls for a 3H:1V slope, then all plots should be built with 3H:1V slopes.

4) The NM Mining and Minerals Division should require sufficient financial assurance to cover reclamation activities using Gila conglomerate as cover material in the event that "leach cap" is not approved.

If Freeport-McMoRan were to declare bankruptcy now and the state of New Mexico had to carry out the reclamation at Little Rock, the state would not use leach cap for reclamation coversoil, since it is currently not an approved cover material. Instead, the state would most likely use Gila Conglomerate since it is the only approved cover material at the Chino and Tyrone mines. In order to cover the added haul costs that would be associated with using Gila Conglomerate in reclamation, the financial assurance for the Little Rock mine should be maintained at \$2,944,583 and not reduced at this time.

We concur with maintaining the surety bonds as the form of the financial assurance.

### 5) MMD should require a comprehensive stormwater plan for the Little Rock Closure-Closeout Plan

NMED has identified the lack of a comprehensive stormwater plan as part of the Little Rock Closure-Closeout Plan. This is a major deficiency in the permit application. We are unclear how MMD could approve the permit application under 19.10.5.508 B (4) without this plan.

#### 6) Concurrent reclamation should be required in the Closure-Closeout Plan.

Given Freeport-McMoRan's poor financial situation (\$20B in debt), it is critical that as much reclamation be done on the mine as soon as feasible. Those areas of the mine that can be reclaimed now should be. Reclamation should proceed concurrently with mining and large areas should not be left unreclaimed until mining is done. Freeport has announced that it will lay off 210 staff at Tyrone and cut production by 50% with cessation of active mining at Tyrone. Although Little Rock will continue to be mined, GRIP is concerned that the company's financial health could compromise timely reclamation, putting the state and the public at risk.

We thank you for consideration of our comments.

Sincerely,

Allyson Siwik Executive Director

allyn T. Swil

Cc: David Ohori, GR007RE Permit Lead, MMD Keith Ehlert, DP-1236 Permit Lead, NMED/GWQB/MECS

## **change.org**Gila Resources Information Project

Recipient: Fernando Martinez

Letter: Greetings,

I am writing in regards to Freeport-McMoRan's application (permit GR007RE, Revision 14-1) to your department to expand the open pit at the Little Rock Mine. The company has also submitted a revised closure-closeout plan to accompany this application.

I am very concerned that the company's proposed reclamation plans are insufficient to protect water quality, wildlife and our environment.

The proposed "leach cap" cover material is unapproved because Freeport has not demonstrated that it meets Mining Act reclamation requirements to control erosion, prevent release of acid or other toxic substances, and support plant growth sufficient to create a "self-sustaining ecosystem."

The NM Mining and Minerals Division should strictly enforce the revegetation standards outlined in the Mining Act regulations to ensure that the cover material used at the Little Rock mine will sufficiently reclaim disturbed lands and create a self-sustaining ecosystem.

Additionally, the pit lake that will form at closure could become acidic and leach toxic metals, injuring wildlife attracted to it as a water source.

Freeport-McMoRan and the NM Mining and Minerals Division should explore partial backfill options that would avoid "perpetual care" of the pit lake for surface water quality and wildlife protection.

I strongly encourage you to strictly enforce the requirements of the Mining Act to ensure that our water quality, wildlife, and environment are protected.

### Comments

Name	Location	Date	Comment
Shelbie Knox	Santa Fe, NM	2015-09-10	Freeport McMoRan should be required to clean up after itself. New Mexico's water is too precious to waste.
J.V. Connors	Silver City, NM	2015-09-10	Enhancing the profits of a multinational corporation should not be weighted more than the water quality of Grant County residents!
carolbeth elliott	Silver City, NM	2015-09-11	I want future water quality protected.
Wick Beavers	Miami, FL	2015-09-11	These earth rapists have no right to our land, water, minerals, air or earth.
John Conway	Silver City, NM	2015-09-11	Corporations are NOT people and holding their feet to the fire on pit lake pollution is the only way to get them to do the right thing!
J.Edward Arguello	Bayard, NM	2015-09-11	We need to Protect our Water resources, for future use of our families
Joanne McEntire	Albuquerque, NM	2015-09-11	Inadequate application should be denied!
lorna ruebelmann	silver city, NM	2015-09-11	Pls enforce the NM Mining Act to protect water and wildlife and enforce the closure-closeout regs that require reclamation of the eco-system.
Mattie Eagle	Silver city, NM	2015-09-11	I care about Silver City and Grant County being a nice place to live with lots of safe outdoor recreation.
Shawn Smith	SAN FRANCISCO, CA	2015-09-11	My mother lives in the area that will be negatively impacted
Doug Hulett	Silver City, NM	2015-09-11	Water protection should be done without a request. A healthy community and Eco system is the number one priority.
Judy de Pedro	Silver City, NM	2015-09-11	We are neighbors of this mine and I'm concerned with the environment surrounding our home. When we purchased our land the mine was not even visible from our land. Now it is like a city at night. I want things to be safe for the wildlife and ourselves along with future generations.
Albert Grauer	Silver City, NM	2015-09-11	We need to protect wildlife and water quality.
Jene Moseley	Silver City, NM	2015-09-11	I'm sick and tired of big business ignoring environmental safeguards that protect local residents. It's all about their bottom line and nothing more.
Ronald Parry	Houston, TX	2015-09-11	I live in the area surrounding the mine.
Mary Yardley	Silver City, NM	2015-09-11	Freeport McMoRan operations have stripped New Mexico's hills of every living thing. They leave in their wake the unemployed, waste pools and barren hills that are unfit for life of any kind.
Richard Martin	Silver City, NM	2015-09-11	Fresh water is too important to pollute. The standards for reclamation are too low. Top soil must be used for habitat restoration. Use native plants from the Burro mountains only. Take out power poles. Remove Tree of Heaven it is NOT Native. Research with the local botanist for riparian plants for shoreline. How are animals supposed to get over a 6 foot fence?
Ron Henry	Silver City, NM	2015-09-11	I am in Spain but live in Grant county. Please follow the mining act faithfully.
stephen mcaloon	Hanover, NM	2015-09-11	I care about the water and nature.and corporations should be strictly regulated and monitered in cases of abuse
pamela morgan	silver city, NM	2015-09-11	more thought needs to be put into a plan that currently encourages wildlife to live next to toxic water
Jean Eisenhower	Silver City, NM	2015-09-11	Protect life by protecting water.
Linda Englund	Chicago, IL	2015-09-11	My sister who lives in Silver City brought this problem to my attention, and she is extremely informed about potential environmental hazards

Name	Location	Date	Comment
Dean Jarosh	SILVER CITY, NM	2015-09-11	Knowing how many vacated mines in NM need remediation we should not be adding another one.  Thank you, Dean Jarosh
Consuelo Hester	Silver City, NM	2015-09-12	There are dead lakes and streams all over the American West. We need to take appropriate caution to prevent a dead lake from destroying our local wildlife.
Jan McCreary	Silver City, NM	2015-09-12	I live in Grant County and I care about our wildlife!
Daniel Lorimier	Truth or Consequences, NM	2015-09-12	Let the Gold King mine be an example. Require full and comprehensive remediation of this mine upon closure.
Vicki Gadberry	Silver City, NM	2015-09-12	I wish to protect wildlife habitat and water for our area.
lynne gnsaizda Ranes	Pueblo, CO	2015-09-12	I am a frequent visitor to New Mexico, I cherish the land,and the people.
Nick Sussillo Sussillo	Silver City, NM	2015-09-12	Mining damage has already caused extensive damage to our local environment, i.e. the Cleveland Mine Superfund Site, the Chino Mine which was almost designated as a Superfund Site, and the Pinos Altos Mining District which has currently been referred to EPA Region 6's Superfund group for Superfund consideration.
Jackie Blurton	Silver City, NM	2015-09-12	The NM Mining & Mineral Division is responsible for regulatory enforcement and should be held to the highest standards to preserve the quality of our water and environment.
gabrielle heynekamp	polvadera, NM	2015-09-12	Because I hate to see further expansion so close to residential and wild forest land
Margot Wilson	Elephant Butte, MN	2015-09-12	Water is more important then copper
Jean Ossorio	Las Cruces, NM	2015-09-12	My late parents lived in Silver City for over thirty years. We still own their house and lot, and two adjoining lots. They worked hard over the entire thirty-plus years to protect the Gila River and adjacent watersheds. It pains me to see that we still must struggle to prevent the pollution of these precious waters by mine waste.
Susan Selbin	Albuquerque, NM	2015-09-12	Please ensure that our water quality, environment and wildlife are protected by strictly enforcing the requirements of the Mining Act!
Patricia (Ann) Grauer	Silver City, NM	2015-09-12	When we visited the Freeport-McMoRan's (a Foreign owned business) Tyrone facility in the Spring with a group from Oak Grove Subdivision we were told Little Rock Mine was NOT going to be any larger ever. It had served it's purpose and would remain the size it would.
			Any enlargement threatens the local wells of neighboring communities. This is NOT acceptable. When this facility was being planned there were numerous meetings. The people of Oak Grove were assured it was to be small and stay small and they presented maps showing how the mine would NOT affect our well water.  During our spring tour they showed us no such maps. I should have been aware something was "in the works" then.
Paul Paryski	Santa Fe, NM	2015-09-14	Clean water and healthy ecosystems are crucial for all life including humans.
Todd Schulke	Silver City, NM	2015-09-15	Clean water forever.
Shelby Hallmark	Silver City, NM	2015-09-16	The future pit lake Freeport wants to be able to create will sit on top of Silver City's acquifer. We need to be assured that every effort has been made to safeguard our water supply for the long run.
David and Rachel Pedigo	Silver City, NM	2015-09-17	We don't want the mine moving any closer to our home in the burros. We're also concerned about the water.

Name	Location	Date	Comment
Robert SouthworthRobertS	Silver City City, NM	2015-09-17	I want our ground water protected by adequately lined sediment ponds.
Steven Lewis	Silver City, NM	2015-09-18	Water is our most precious public resource and we need to protect it. The cost of keeping pollution contained should be the cost of doing business, not taxpayer subsidized.
J.E. Foster	Silver City, NM	2015-09-18	Destroying more land and water is insane.
Elizabeth Zeiler	Santa Fe, NM	2015-09-18	What is water without the quality?
shirley Pevarnik	Silver city, NM	2015-09-18	The mines have historically been dishonest about their pollution of air, water, and land! The state government seems to just let them do what they want even though it is a foreign company that historically lays people off and wants the government to pay their unemployment and retaining.
Terry Timme	Silver City, NM	2015-09-19	An open pit lake could threaten groundwater and wildlife
Robin Parsons	San Lorenzo, NM	2015-09-22	Please refrain from destroy our water Ways.
Stephen Baker	Hanover, NM	2015-09-22	I want this area to be reclaimed in a way that ensures a future that meets the revegetation standards of the NM Mining Act.
Ivan White	Las Cruces, NM	2015-09-22	Because this is important to New Mexico!
Michael P. Berman	San Lorenzo, NM	2015-09-22	There is nothing more important then water. And the cleanliness of our ground water will be critical for generations to come. Mines should not be able to externalize the costs of pollution to future generations.
carolyn morrison	silver city, NM	2015-09-22	I'm signing because I'm worried about the long term health effects for wildlife; and concerned about the lack of good science to back the proposed "cover" material. I attended the hearing recently, and it did not resolve my concerns.
Ann Lowe	Santa Fe, NM	2015-09-22	I'm signing because I want our ground water to stay pure!
Jody Benson	Los Alamos, NM	2015-09-23	We can have botheconomic development and a clean environment. Let's be smart. Your mom would've told you it's easier to do it right the first time than to clean up and have to do it all over again.
Athena Wolf	Mimbres, NM	2015-09-23	This company is destroying the clean water in Grant county. Please stop this!
Azima Lila Forest	Silver City, NM	2015-09-23	This is environmentally UNSOUND!
Carol Watson-Brand	Silver City, NM	2015-09-23	I believe this action is required!
Lawrence McDaniel	Silver City, NM	2015-09-23	I'm concerned about water and water quality issues in the state of New Mexico
Morgan Paige	San Lorenzo, NM	2015-09-23	The NM Mining Act must be strictly enforced!

### **Change.org Petition to Fernando Martinez re: Little Rock Mine Expansion SIGNATURES**

Name	City	State Pos	stal Code
Allyson Siwik	Tyrone	New Mexico	
Kathleen O'Keefe	Rio Rancho	New Mexico	87144
Dennis OKeefe	Silver City	New Mexico	88061
Pete Dronkers	Ridgway	Colorado	81432
diana ingalls	silver city	New Mexico	88061
Shelbie Knox	Santa Fe	New Mexico	87507
JV Connors	Silver City	New Mexico	88061
Jake Margerum	Philadelphia	Pennsylvania	19129
Sandra Sussillo	Silver City	New Mexico	88061
michele lilienthal	cliff	New Mexico	88028
Patti BearPaw	Albuquerque	New Mexico	87111
carolbeth elliott	Silver City	New Mexico	88061
Wick Beavers	Miami	Florida	33155
Donna Stevens	Gila	New Mexico	88038
Teri Matelson	Silver City	New Mexico	88061
Rev. Dr. Jane `Foraker-Thompson	Silver City	New Mexico	88061
John Conway	Silver City	New Mexico	88061
jane papin	silver city	New Mexico	88061
Sally Smith	Hanover	New Mexico	88041
Marguerite Bellringer	Silver City	New Mexico	88061
Robert Marquez	Las Cruces	New Mexico	88005
Angela Flanders	Schoharie	New York	12157
eric casler	Silver City	New Mexico	88061
Brete Carlsen	Silver City	New Mexico	88061
Lynn Hefele	Silver City	New Mexico	88061
Teresa Winchester	Magdalena	New Mexico	87825
J.Edward Arguello	Bayard	New Mexico	88023
Evans Denise	Silver City	New Mexico	88061
Joanne McEntire	Albuquerque	New Mexico	87112
Alice Rickle	Silver City	New Mexico	88061
Debra Hein	San Jose	California	95125
Lorna Ruebelmann	Silver City	New Mexico	88061
Mattie Eagle	Silver city	New Mexico	88061
Pamela Bryant	Silver City	New Mexico	88061
Shawn Smith	SAN FRANCISCO	California	94107
Sue Pienciak	Silver City	New Mexico	88061
Sam Fry	Silver City	New Mexico	88061
Doug Hulett	Silver City	New Mexico	88061
catherine holt	santa clara	New Mexico	88026

Nancy Williamson	Hanover	New Mexico	88041
Judy de Pedro	Silver City	New Mexico	88061
Ken Barr	Mimbres	New Mexico	88049
A.T. Cole	Silver City	New Mexico	88061
Albert Grauer	Silver City	New Mexico	88062
Jene Moseley	Silver City	New Mexico	88061
Carol Ann Young	Silver City	New Mexico	88062
Ronald Parry	Silver City	New Mexico	88061
Mary Yardley	Silver City	New Mexico	88061
Carol Martin	Silver City	New Mexico	88061
Pat Wolph	Silver City	New Mexico	88061
Ronald Henry			88062
Linda Zatopek	Silver City	New Mexico	88062
Melanie Zipin	Arenas Valley	New Mexico	88022
stephen mcaloon	Hanover	New Mexico	88041
Kenneth Keppeler	Silver City	New Mexico	88061
CAROL SASSAMAN	Bellemont	Arizona	86015
François Hance			52300
Pamela Morgan	Silver City	New Mexico	88061
Robert Wedemeier	Santa Clara	New Mexico	88026
Brett Rovnyak	Youngstown	Ohio	44512
Jean Eisenhower	Silver City	New Mexico	88061
Linda Englund	Chicago	Illinois	60626
Sandra Hicks	Silver City	New Mexico	88061
bruce richardson	Chimayo	New Mexico	87522
Don Beams	Silver City	New Mexico	8
Dean Jarosh	Silver City	New Mexico	88061
celina mcfadden	Silver City	New Mexico	88061
Dallas Rychener	Silver City	New Mexico	88061
Tom Hester	Silver City	New Mexico	88061
Sharon Bookwalter	Silver City	New Mexico	88061
Jan McCreary	Silver City	New Mexico	88062
Daniel Lorimier	Truth or Consequences	New Mexico	87901
Thomas Gorman	Santa Fe	New Mexico	87508
Vicki Gadberry	Silver City	New Mexico	88061
Heather Kline	Albuquerque	New Mexico	87102
Lynne Gnaizda-Ranes	Pueblo	Colorado	81008
Archi Padilla	Hurley	New Mexico	88043
Nick Sussillo Sussillo	Silver City	New Mexico	88061
Jackie Blurton	Silver City	New Mexico	88061
Mary burton Riseley	Cliff	New Mexico	88028
Jennifer Durkin	Silver City	New Mexico	88061
Stockdale Nancy	Silver City	New Mexico	88061

Gabrielle Heynekamp	Polvadera	New Mexico	87828
Margot Wilson	Elephant Butte	Minnesota	87935
Jean Ossorio	Las Cruces	New Mexico	88011
Melinda Smith	Albuquerque	New Mexico	87107
moesha herron	Orlando	Florida	32806
William Brown	TorC	New Mexico	87901
jill steidl	Silver City	New Mexico	88061
Dianne Urey	Farmers Branch	Texas	75234
Susan Selbin	Albuquerque	New Mexico	87107
stephanie smith	Silver City	New Mexico	88062
Patricia (Ann) Grauer	Silver City	New Mexico	88062
DeAnna Mooney	Silver City	New Mexico	88061
Kate Brown	Hanover	New Mexico	88041
Deborah Shatzkin	Mimbres	New Mexico	88049
Mary Ray	Winston	New Mexico	87943
Skeeter Leaard	San Antonio	New Mexico	87832
Shannon Romeling	Ranchos de Taos	New Mexico	87557
Paul Paryski	Santa Fe	New Mexico	87506
Todd Schulke	Silver City	New Mexico	88061
Sharon Horne	North Woodstock	New Hampsh	3262
Patricia Carlton	Santa Fe	New Mexico	87505
Chelsi Straubinger	Silver City	New Mexico	88061
Richard Gilmore	Silver City	New Mexico	88061
Shelby Hallmark	Silver City	New Mexico	88061
Debra Gassaway	Silver City	New Mexico	88062
Doc Campbell	Silver City	New Mexico	88061
Cheryl Speir-Phillips	Pinos Altos	New Mexico	88053
David and Rachel Pedigo	Silver City	New Mexico	88061
Sharli Taylor	Phelan	California	92371
Scott Klabunde	Silver City	New Mexico	88062
Jenifer Stedman	Golden Valley	Arizona	86413
Max Yeh	Hillsboro	New Mexico	88042
Mary Harwood	Silver City	New Mexico	88061
leon fager	Gulfport	Mississippi	39501
Dutch Salmon	Silver City	New Mexico	88062
Robert SouthworthRobertS	Silver City City	New Mexico	88061
Patricia Williams-Mello	Albuquerque	New Mexico	87106
Dennis Weller	Silver City	New Mexico	88061
Eleanor Wootten	Gila	New Mexico	88038
Steven Lewis	Silver City	New Mexico	88061
melissa green	Silver City	New Mexico	88061
Daniel Gauss	Deming	New Mexico	88030
J.E. Foster	Silver City	New Mexico	88062

Elizabeth Zeiler	Santa Fe	New Mexico	87501
Shirley Pevarnik	Silver City	New Mexico	88061
Janine Stamper	Sammamish	Washington	98075
Terry Timme	Silver City	New Mexico	88061
Rebecca Summer	SILVER CITY	New Mexico	88061
Charris Ford	Gualala	California	95445
Robin Parsons	Hanover	New Mexico	88041
Stephen Baker	Hanover	New Mexico	88041
Susan Stowell	Hanover	New Mexico	88041
Esther Melvin	Silver City	New Mexico	88061
Ivan White	Las Cruces	New Mexico	88001
John Lawson			88061
Michael Berman	Hanover	New Mexico	88041
Stuart koster	Las Cruces	New Mexico	88012
Charmeine Wait	Silver City	New Mexico	88062
Elliot Stern	Santa Fe	New Mexico	87505
Ken Hughes	Santa Fe	New Mexico	87507
Tsama Pineda	Silver City	New Mexico	88061
carolyn morrison	Silver City	New Mexico	88062
david tercero	Silver City	New Mexico	88061
Jonathon Conrad	O Fallon	Illinois 62	269-7065
David Gemeinhart	Santa Fe	New Mexico	87508
Teresa Seamster	Santa Fe	New Mexico	87508
Margo Berg	Glenwood	New Mexico	88039
Sandra Lucas	Silver City	New Mexico	88061
Odile De La Beaujardiere	Los Lunas	New Mexico	87031
Ann Lowe	Santa Fe	New Mexico	87505
Elizabeth Lee	Santa Fe	New Mexico	87508
Victoria Regina	Albuquerque	New Mexico	87120
Chris Lock	Las Cruces	New Mexico	88007
Leeittle Sonne	Reserve	New Mexico 87	
Lisa Jimenez	Silver City	New Mexico	88061
Robert McDermott	Silver City	New Mexico	88061
elisabeth bakshi	Silver City	New Mexico	88061
Helen Lemal	Silver City	New Mexico	88061
Jody Benson	Los Alamos	New Mexico	87544
krisandra wamsley	Hanover	New Mexico	88041
Athena Wolf	Mimbres	New Mexico	88049
William Kinney	Hanover	New Mexico	88041
Martha Cooper	Cliff	New Mexico	88028
Azima Lila Forest	Silver City	New Mexico	88061
Carol Watson-Brand	Silver City	New Mexico	88062
	•		
Elizabeth Royce	Troy	New Hampsh	3465

doreen glover Silver City New Mexico 88061

Country Signed On

9/10/15 PETITION STARTED BY

**United States** United States 9/10/15 **United States** 9/10/15 United States 9/10/15 United States 9/10/15 United States 9/10/15 **United States** 9/10/15 United States 9/10/15 United States 9/10/15 **United States** 9/10/15 United States 9/11/15 9/11/15

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### **Ennis, David, EMNRD**

From: Sent: To: Subject: Attachments:	Ohori, David, EMNRD Monday, September 28, 2015 3:10 PM Ennis, David, EMNRD FW: Little Rock Letter from Carol Martin.pdf
DJ,	
Please post this for Little	Rock Rev. 14-1 post-public hearing comments.
Thanks.	
-David	
<b>Sent:</b> Thursday, Septemb <b>To:</b> Ohori, David, EMNRD	to:Lynn_Lande@FMI.com] per 24, 2015 12:46 PM D <david.ohori@state.nm.us> MNRD <holland.shepherd@state.nm.us>; Shelley, Thomas L. <thomas_shelley@fmi.com></thomas_shelley@fmi.com></holland.shepherd@state.nm.us></david.ohori@state.nm.us>
Hi David,	
	s sent to Tyrone from a member of the community. We will let her know that we forwarded her e give me a call if you have any questions.
Thanks!	
Lynn	

### Plants Not Native to Burro Mountain Little Rock Mine Closure

Galleta grass (Plueraphis jamesii)

Bottlebrush squirreltail (Sitanion hystrix)

Indian Ricegrass (Oryzopsis hymenoides)

Streambank wheatgrass (Agropron dastachyum v. riparium)

Mountain mahogany (Cercocarpus montanus)

Indian ricegrass Achnatherum hymenoides)

Desert needlegrass (Achnatherum speciosum)

Sand bluestem (Andropogon hallii)

Silver bluestem (Andropogon saccharoides)

Blue wildrye (Elymus glaucus)

Thickspike wheatgrass (Elymus lanceolatus ssp. Lanceolatus)

Streambank wheatgrass (Elymus lanceolatus ssp. Psammophilus)

Tanglehead (Heterotheca contortus)

Western wheatgrass (Pascopyrum smithii)

Galleta grass (Pleuraphis jamaesii)

Sandberg's Bluegrass (Poa secunda)

Bluebunch wheatgrass (Pseudodoroegneria spicata)

Plains bristlegrass (Setaria vulpiseta)

Alkali sacaton (Sporobolus airoides)

Sleepygrass (Stipa robusta)

Downy paintbrush (Castilleja sessiliflora)

Lanceleaf tickseed (Coreopsis lanceolate)

Plains tickseed (Coreopsis tinctoria)

In my experience it is not proper Habitat Restoration procedure to introduce species that are not found in the immediate area to be restored. These non-native plants are not suited for the elevation or freeze factors or soil composition. These plants are Not Native to the planned Little Rock Mine area and should not be introduced. I believe it would be a great idea to check with the local Silver City expert Botanists for the proper species and also include their input for riparian native plants to help filter the water and improve water quality for the 40+ acre pit lake. Western New Mexico University has Botanists on staff that can help you with these decisions. As a member of the Silver City Native Plant Society I would like to see the Native Habitat restored to its original environment. If you need seeds or plants you could contact Borderlands Restoration PO Box 1191 299 McKeown Ave. Suite #3 Patagonia, AZ 85624. They will collect seeds from the immediate area and store or grow them out for restoration. Sky Island Alliance and the National Park Service uses them for correct conservation methods.

Thank you for accepting input for proper remediation in trying to protect ground water and natural resources for people, plants and animals.

Carol A. Martin

Burro Mountain Resident

#### **Ennis, David, EMNRD**

From: Ohori, David, EMNRD

Sent: Monday, September 28, 2015 3:10 PM

To: Ennis, David, EMNRD

**Subject:** FW: HOLD FREEPORT ACCOUNTABLE ON LITTLE ROCK MINE EXPANSION

DJ,

Please post this for Little Rock Rev. 14-1 post-public hearing comments.

Thanks.

-David

From: Janet Wallet-Ortiz [mailto:bluegold54@gmail.com]

**Sent:** Wednesday, September 23, 2015 11:00 PM **To:** Ohori, David, EMNRD <david.ohori@state.nm.us>

Subject: HOLD FREEPORT ACCOUNTABLE ON LITTLE ROCK MINE EXPANSION

Dear Mr. David Ohori,

Thank you for the opportunity to comment on the LIttle Rock Mine Expansion that Freeport is planning.

Please hold this multi-billion dollar corporation accountable.

- 1. This expansion will result in the formation of a pit lake. Research from all over the world states that such a lake, because it is in sulfide rocks, will become acidic over time. Please insist that Freeport will use best practices and all the latest research to protect us and any wildlife that may encounter this pit lake.
- 2. Freeport owns that there will be some mine impacted groundwater that can head north over the Southern Star Fault. This contamination could easily flow into the Mangas aquifer. Freeport needs to pay out some of its billions of dollars to purchase the latest and best monitoring equipment recommended by best practices in the mining industry to ensure that contaminated groundwater is being contained and not flowing off site. Without groundwater monitoring no one will know what is going on in the aquifer itself.
- 3. Freeport intends to use "leach cap" as a cover material. This material is made up of coarse rock fragments and there is absolutely NO guarantee that this cheaper way of reclaiming land is suitable for vegetative regrowth--nor has it been proven to stop erosion. These are serious problems for leach cap. DO NOT GIVE IN TO FREEPORT ON THIS VERY CRITICAL ISSUE. PLEASE REQUIRE THAT ONLY AN APPROVED COVER MATERIAL BE USED BY FREEPORT.

If Freeport is allowed to use such flimsy ground cover, their reclamation will only be a sham and the state may have to come in at a later date and, with our precious tax dollars, have to clean up all over again. This is an outrageous possibility. MMD need to stand tall and firm about this issue for the safety of our lands.

FREEPORT NEEDS TO STRICTLY ADHERE TO THE CLOSURE-CLOSEOUT PLAN. MMD NEEDS TO DO ITS JOB AND PROTECT NEW MEXICAN TAXPAYERS AND OUR ENVIRONMENT FROM TOXIC WASTE.

LOOK WHAT HAPPENED IN COLORADO! WE CANNOT AFFORD TO PLAY GAMES WITH TOXIC WASTE.

Freeport has made millions off of its mining operations all over the world. They can afford to do this the right way. NO CUTTING CORNERS!

Thank you for your time.

Janet Wallet-Ortiz 2009 N Juniper Ave Silver City, New Mexico 88061