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To: [Ohori, David, EMNRD](#)
Subject: NMOSE comments - Revision 20-1 to Little Rock Mine, MMD Permit No. GR007RE, Freeport-McMoRan Tyrone Operations
Date: Monday, January 11, 2021 4:32:57 PM

Hi David -

Thank you for the opportunity to review the subject Applicant submittals. I apologize if these comments are a bit late in being delivered, but wanted to provide them to remind the applicant of NMOSE filings that might be in order if the revision is authorized by the MMD:

- Based on Figure 6-2, it appears there is a slight westward incursion of the “Projected extent of open pit at end of mine life” proposed beyond that of the “Existing Little Rock Mine permit boundary”. Figure 2-8 notes ENE potentiometric gradient across the project area. July 2, 2020 letter to Jerry Schoeppner from owner of water well GSF-4296 (located approximately 1.9 miles west of Little Rock pit) claims approximate 100-ft drop in well’s static water level since being drilled in 2006. Should the drop in potentiometric level at GSF-4296 be directly related to pit dewatering, expanding pit edge westward at a depth below potentiometric level encountered during pit excavation would appear to add some increment of aquifer drawdown in excess of that apparently already approved under existing permits. monitor wells, or wells encountering groundwater proposed as part of the project shall be permitted and conditioned by the NMOSE prior to drilling. Unless permitted with pre-approved well decommissioning conditions, any such existing or proposed well shall be decommissioned under an authorized NMOSE Well Plugging Plan of Operations.
- Water rights associated with the Little Rock Mine project were authorized under permit conditions specific to the appropriation volume, transmission and evaporative losses, and place and purpose of use. If the proposed Revision 20-1 for MMD Permit No. GR007RE results in changes to the terms of the NMOSE water right, additional filings may be required through our Deming Water Rights Office.

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