



Gila Resources Information Project

Promoting Healthy Communities by Protecting Our Environment Since 1998

December 19, 2014

James Hollen
Mining Act Reclamation Program
Mining and Minerals Division
1220 South St. Francis Dr.
Santa Fe, NM 87505-6110

RE: Public Comment on Revision 14-1 to Cobre Mining Co. Permit GR002RE

Dear Mr. Hollen:

Per 19.10.5.505.E NMAC and your letter dated October 8, 2014, I am submitting public comments related to Freeport-McMoRan's September 22, 2014 application to change the permit boundary and design limits for the Cobre/Continental Mine.

P. 6 of Application - NMAC 19.10.5.508.B (2) Wildlife Protection – Were the bat habitat protection measures installed in mine features near the Cobre Haul Road route as stated?

p. 6 – 7 of Application – NMAC 19.10.5.508.B(4) Hydrologic Balance – Was Cobre Storm Water Pollution Prevention Plan (SWPPP) submitted to EPA? If so, was it approved? What are the SWPPP monitoring, inspection, and control measures and Best Management Practices that will be implemented to minimize the potential contribution of suspended solids and other pollutants to surface waters from construction of the Cobre Haul Road? Where is the data on background levels for surface water entering the permit area? This is not provided in the application per 19.10.5.508.B (4)(c).

p. 7 of Application – NMAC 19.10.5.508.B(7) Minimization of Mass Movement – How will top soil be “stored appropriately” to minimize mass movement? Where will it be stored?

p. 8 of Application – NMAC 19.10.5.508.B(11) Explosives – Given community concerns about noise and vibrations, it seems that a “detailed blasting plan, pre-blast surveys or blast design limits to control possible adverse effects to structures” should be required by the Director to determine if procedures will be sufficient to minimize impacts to residences.

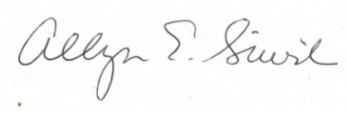
p. 9 of Application – NMAC 19.5.508.C Site Stabilization and Surface Configuration – How will the site be configured and stabilized to protect air quality? Permit application does not address how air quality will be protected during mining operations.

p. 9 of Application – NMAC 19.5.508.D Erosion Control – According to Cobre closeout plan, the haul road will be revegetated, but it is not discussed in this section. How frequently will monitoring be conducted to evaluate and control erosion?

Thank you for consideration of our comments.

As requested, I have also attached GRIP's scoping comments on the Cobre Mine Plan of Operation submitted to the Bureau of Land Management.

Sincerely,

A handwritten signature in cursive script that reads "Allyson Siwik". The signature is written in black ink on a white background.

Allyson Siwik
Executive Director