

20190618-002



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



Ground Water Quality Bureau

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Michelle Lujan Grisham
Governor

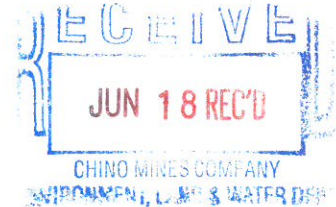
Howie C. Morales
Lieutenant Governor

James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

June 13, 2019

Ms. Sherry Burt-Kested, Manager
Environment Services
Freeport-McMoRan Chino Mines Company
P.O. Box 10
Bayard, New Mexico 88023



RE: Comments for Revised Technical Memorandum for the Groundhog No. 5 Stockpile Geochemical Evaluation for the Hanover-Whitewater Creek Investigative Unit (HWCIU), Chino Administrative Order on Consent (AOC)

Dear Ms. Burt-Kested:

The New Mexico Environment Department (NMED) has reviewed the subject report dated February 27, 2018. NMED has determined that while the report adequately addresses the waste rock stockpile's geochemistry and its potential impact to surface water, the report is limited and incomplete in evaluating potential impacts to groundwater due to there being no monitoring wells immediately down gradient of the waste rock stockpile.

NMED requests that supplemental information be provided with the report to demonstrate protection of groundwater quality be performed and submitted for review within 30 days. This could include additional modeling of groundwater mixing and flow path; a technical discussion of the interaction between groundwater, the stockpile, infiltration, and geologic/hydrologic controls; and the resulting impact of placing a minimum of a one foot cover system with vegetation, as required under the Mining and Minerals Division (MMD) permit. In addition, discussion of possible data gaps such as the absence of downgradient monitoring wells and any other assumptions taken into consideration regarding the potential impact to groundwater should be explained thoroughly.

Please contact me should you have any questions.

Sincerely,

David Mercer, Chino AOC Project Manager
Mining Environmental Compliance Section
Ground Water Quality Bureau
New Mexico Environment Department

Silver City Field Office

DWM: dwm

cc: Kurt Vollbrecht, Program Manager, MECS (via email)
Petra Sanchez, Remedial Program Manager, USEPA (via email)
Joe Fox, AOC Team Leader, MECS (via email)
Joe Allen, Formation Environmental (via email)
Pam Pinson, Freeport-McMoRan Chino Mines Company (via email)
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