



Freeport-McMoRan Chino Mines Company
P.O. Box 10.
Bayard, NM 88023

October 28, 2025

Certified Mail # 70221670000184288325

Mr. Joseph Fox, Manager
New Mexico Environment Department
Ground Water Quality Bureau
Mining Environmental Compliance Section
P. O. Box 5624
Santa Fe, New Mexico 87502

Dear Mr. Fox:

**Re: Annual Monitoring Report, Groundhog Mine Site IRA
Hanover-Whitewater Creeks Investigation Unit, Chino AOC**

Freeport-McMoRan Chino Mines Company (Chino) submits the Annual Monitoring Report for the completed Groundhog Mine Site Interim Remedial Action (IRA) for the monitoring period ending September 30, 2025. This annual report summarizes past and recent administrative changes to the IRA site, documenting removal of AOC monitoring requirements. Based on this summary, Chino is requesting to terminate annual reporting for the IRA as supported in the following discussions.

Groundhog Mine Site IRA and the associated Osceolla, CG Bell, and Tenderfoot B Stockpiles IRA were completed by Chino pursuant to requirements of the Administrative Order on Consent (AOC) between the New Mexico Environment Department (NMED) and Chino. For meeting reporting requirements in Section 6.0 of both the Groundhog Mine IRA Completion Report and the Osceolla, CG Bell, and Tenderfoot B Stockpiles IRA Completion Report, dated June 10, 2009, and October 29, 2009, respectively, Chino combined monitoring information for the IRAs into one annual report due to the proximity and similarity of the IRAs. Requirements listed in Section 6.2 *Erosion and Vegetation Monitoring* in the Completion Reports, were met with the submittal of a five-year quantitative vegetation survey report dated September 30, 2016. Following NMED approval of the survey report dated August 31, 2017, quarterly erosion monitoring was no longer provided in the annual reporting having met the goal of a "viable self-sustaining vegetated cover ..." in Section 6.0. No additional monitoring has since been provided in the annual reporting for the Osceolla, CG Bell, and Tenderfoot B Stockpiles IRA.

NMED in their letter dated April 28, 2025, approved the 2024 annual report and further stated that:

"The issuance of (renewed 2024) DP-484 establishes the responsibility of the "Groundhog Lower Pond collection system" into the operation discharge permit, including monitoring and inspection requirements, and the potential necessity for abatement of groundwater in the area to the DP-1340 Sitewide Abatement and Closure permit.

Therefore, that operational permit action by NMED depicted in Figure 2 of the 2024 annual report allows for the removal of oversight of the Groundhog Lower Pond Collection System from the Chino AOC."

Chino previously conducted bi-annual surface water and groundwater quality monitoring under the AOC at the Groundhog Mine Site per the requirements in Section 6.0 of the IRA Completion Report dated June 10, 2009. Please see Figure 1 for locations of the monitoring wells, surface water sampling sites, and IRA sites.

- Monitor wells in the Groundhog Mine site include GH-2004-2S and GH-2004-2D.
- The identified surface impoundment sampling locations included the Lower Stormwater Sump (GH-Sump) and the Lower Stormwater Pond (GH-Lower Pond), which together comprise the Groundhog Mine seepage collection system located up-gradient of, and including, the headwall.
- Analytical results from monitoring well and surface water samples collected from 2009 to 2024 were screened against New Mexico Groundwater Quality Standards and the full data summary can be reviewed in the approved October 2024 Groundhog IRA Annual Monitoring Report.

Groundwater quality is now being addressed as part of the Discharge Permit DP-1340 as described in the *Draft Revised Final Site Investigation Report* under Stage I Site Wide Abatement (SWA) dated March 30, 2016, currently under review by NMED.

Currently, the operational pipelines for the Chino mill divide the IRA site and the Groundhog Mine seepage collection system. The Groundhog Lower Stormwater Pond is now utilized by mine operations as a containment for upset conditions in the event of a pipeline break as part of the "pipeline spill containment system" under Discharge Permit DP-484. Surface water reporting to the seepage collection system is pumped to Reservoir 17 for use as process water. The Groundhog Lower Pond, and the upstream natural drainage comprising the collection system, will no longer be included in the AOC Groundhog Mine IRA per NMED approval discussed above. The IRA remedial objectives are not in alignment with active operations for these sites. The renewed operational DP-484, issued January 19, 2024, incorporates the collection system, addressing the portion of the IRA site that is now part of active operations. Additionally, DP-1340 also incorporates this area of the Groundhog site under the closure/closeout plan (CCP) dated October 30, 2024, as well as under SWA. Please see **Figure 2** for AOC and DP-484 boundaries.

Thus, Chino requests to terminate annual monitor reporting for the Groundhog Mine Site IRA. Both IRA areas will be assessed for remedial success under the pending Feasibility Study and Record of Decision for the Hanover and Whitewater Creeks Investigation Unit.

If you require additional information regarding this annual report and request to terminate annual reporting, please contact Ms. Pam Pinson at (575) 912-5213.

Sincerely,



Sherry Burt-Kested, Manager
Environmental Services

SBK:wk
Enclosures
20251023-001

ec: David Mercer, NMED (via email)
Michael Boulay, NMED (via email)
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Erica Almance, Environmental Protection Agency (via email)
Steward, Mike, FMI (via email)
Mariana Lafon, Chino

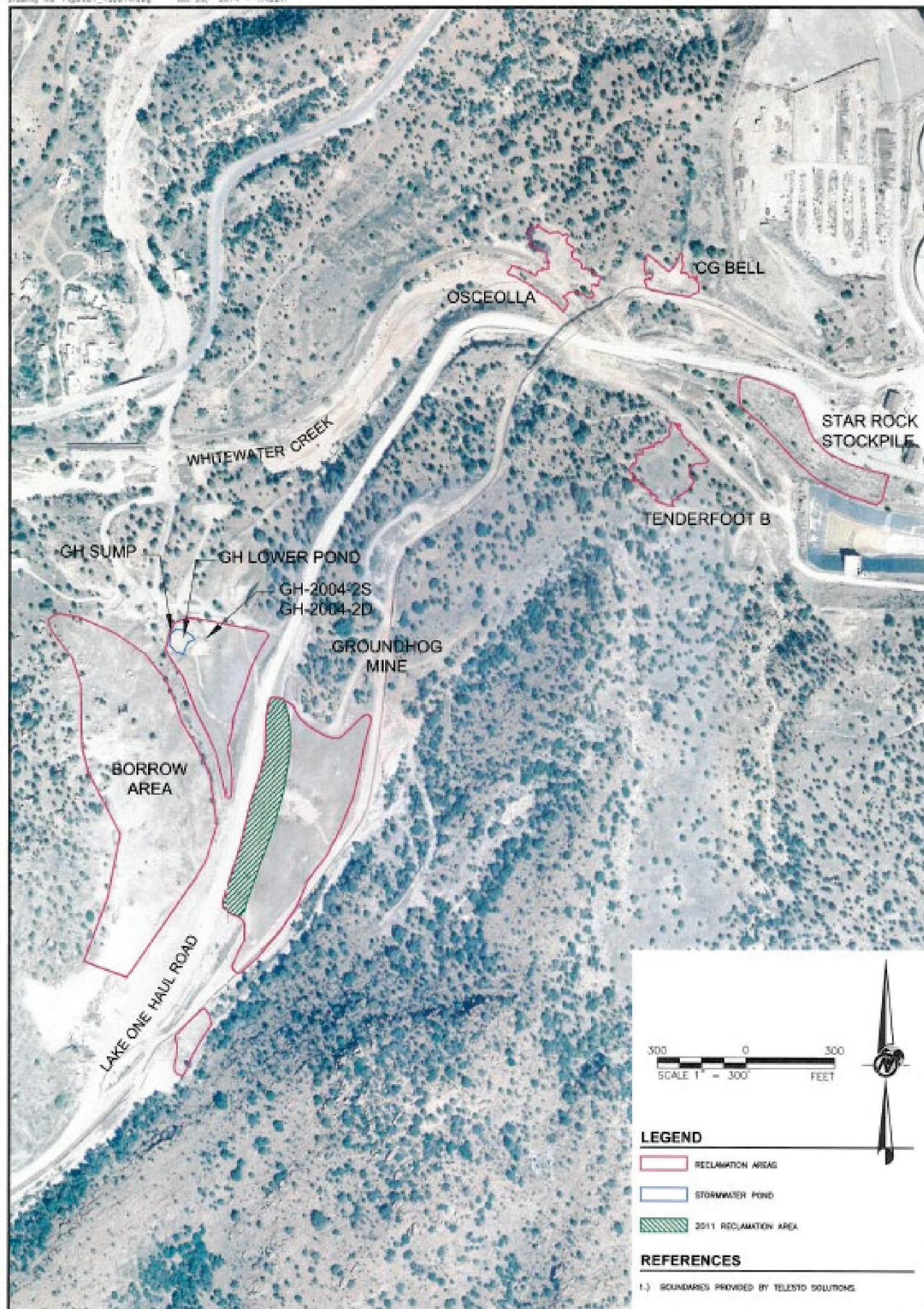


FIGURE 1

PROJECT NO.	141-1100
FILE NO.	Figure01.dwg
DATE	10/29/14
SCALE	AS SHOWN
DESIGN	10/29/14
CHECK	10/29/14
APPROVE	10/29/14

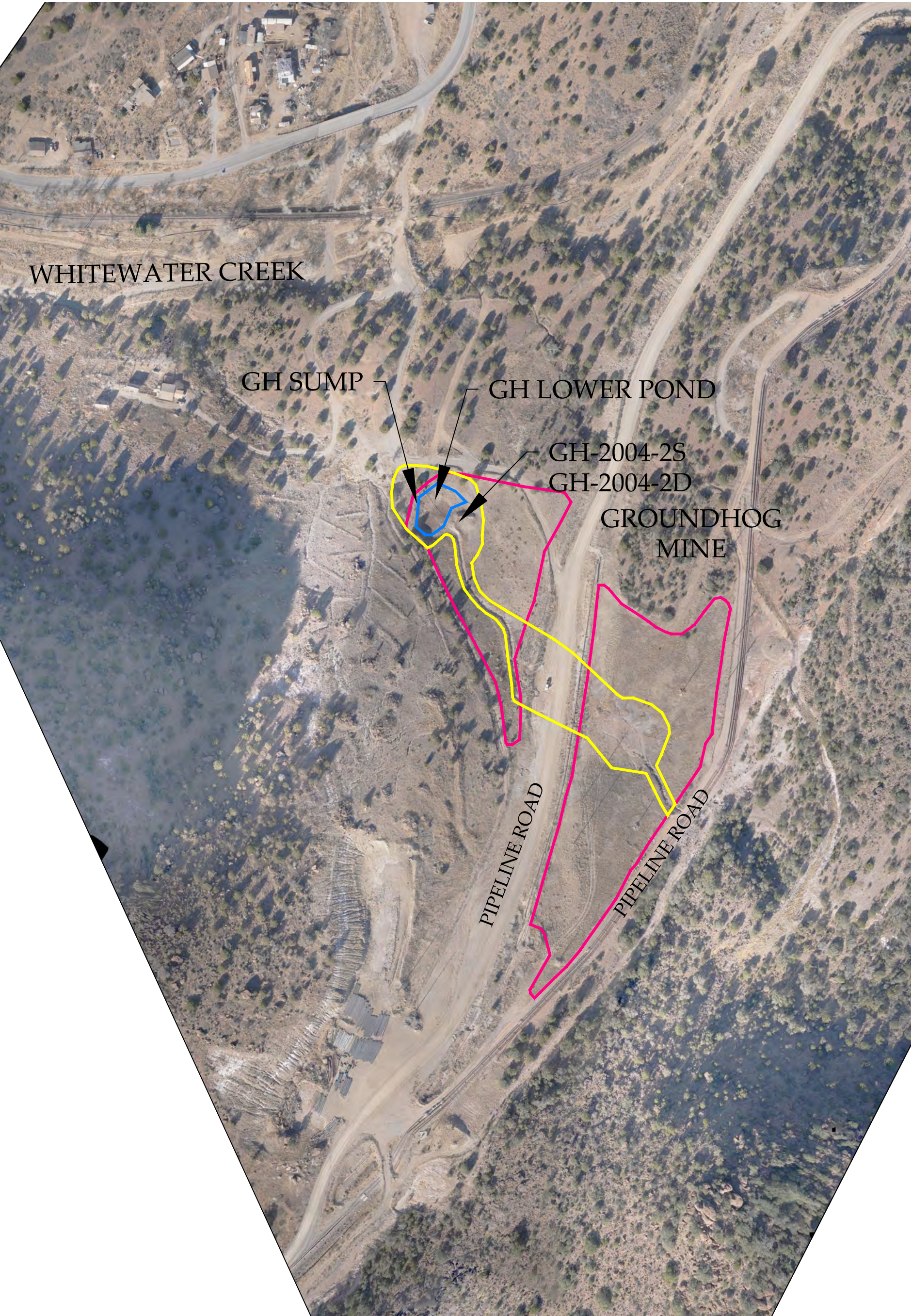
ANNUAL MONITORING OF INTERIM REMEDIAL ACTION SITES LOCATION MAP

PROJECT



GROUNDHOG MINE AND SMALL
HISTORIC STOCKPILES (RA)S
GRANT COUNTY, NEW MEXICO





Legend

- DP-484 Operational Area/Pipeline Spill Containment System
- Reclaimed Area
- Pond



FREEPORT-McMoRAN
CHINO MINES COMPANY

Figure 2

Scale: As Noted	Date: 10-21-2025	Notes:
Dept. Environmental Services		
Drawn By: SMG	Checked By: WK	