



March 4, 2016

Doug Haywood
BLM Las Cruces District Office
1800 Marquess Street
Las Cruces, NM 88005

Re: Response to Request for Comments on the BLM's Copper Flat Copper Mine Draft Environmental Impact Statement (EIS)

Dear Mr. Haywood:

Tri-State Generation and Transmission Association, Inc. (Tri-State) is a wholesale electric power producer/supplier that serves 44 rural electric cooperatives and public power districts in Colorado, Nebraska, New Mexico and Wyoming. Tri-State's member distribution systems serve nearly 578,000 metered customers (translating to a population of more than 1.4 million people). Tri-State's 250,000 square mile member service territory includes all or parts of 27 counties throughout New Mexico. Tri-State's transmission system includes approximately 5,300 miles of high voltage transmission lines and 135 substations and switching stations.

Tri-State owns the 12.4-mile Caballo-Copper Flats 115 kV transmission line that was originally constructed in 1982 to power the mine (BLM ROW Grant #NMNM 32038).

Tri-State Comments by Section

2.1.6 Electrical Power (Proposed Action)

2.2.6 Electrical Power (Alternative 1)

2.3.6 Electrical Power (Alternative 2)

The plant electrical load requirements referenced in these sections are assumed to be average and not peak loads.

2.3.6 Electrical Power

This section describes the electrical facilities to be constructed which may be premature. The identified facilities appear to be reasonable for the project under consideration. However, the actual facilities to be constructed and any additional transmission system facility upgrades required would be defined in a completed System Impact Study (SIS) and Facility Study (FS) performed by the transmission owner of the Springerville – Macho Springs 345 kV line (El Paso Electric).

3.25.1.1 Power

Tri-State is not familiar with the M3 2012 and THEMAC 2013 references in this section.

3.25.2.1.1 Mine Development/Operation

This section states “Tri-State Generation has stated that sufficient power generating capacity exists to meet mine needs without impacting other users”. This statement is correct as applied to generating capacity. Tri-State initial studies also indicate that available transmission capacity (ATC) is adequate for the Springerville – Macho Springs 345 kV line for the conditions and





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contingencies studied. However, actual ATC for the Springerville – Macho Springs 345 kV line would need to be confirmed in an SIS performed by the transmission owner (El Paso Electric).

The statement “The power demands of the mine are not anticipated to approach the capacity of power suppliers under any operation condition” should be modified to read “The power demands of the mine are not anticipated to approach the capacity of power suppliers under operational conditions studied”.

3.25.2.2 Alternative 1: Accelerated Operations-25,000 Tons per Day

Power: See comments for section 3.25.2.1.1.

Reference to daily demand of 5559.25MWh should be corrected to 559.25MWh.

3.25.2.3 Alternative 2: Accelerated Operations-30,000 Tons per Day

Power: See comments for section 3.2.6 and 3.25.2.1.1

Utilities and Infrastructure: Assume that this is referencing elements other than transmission related facilities.

General Comments

Tri-State performed an initial analysis of the transmission system in 2012 that evaluated the capabilities of Tri-State owned facilities. cursory analysis was also performed that evaluated the transmission system in the area which primarily involved the Springerville – Macho Springs 345 kV line owned by El Paso Electric. The results of the assessment performed in 2012 remain consistent with recent Tri-State studies as related to Tri-State owned facilities and are accurately reflected in the EIS. Statements in the EIS that involve facilities owned by other transmission facilities, specifically El Paso Electric, cannot be confirmed without an approved SIS and FS performed by the transmission owner or transmission provider.

From the system as previously studied, Tri-State does not anticipate any issues with the proposed project as defined in the EIS. However, Tri-State would defer any specific project scope definition of the electric transmission infrastructure until the appropriate studies have been performed that confirm the initial analysis.

Thank you for the opportunity to comment on this EIS. If you have any questions or require additional clarification, please contact me at 303-452-3448.

Sincerely,

Karl W. Myers
Transmission Environmental Manager

cc: Jimmy Capps, Sierra Electric Cooperative, Inc.