

January 16, 2016

Doug Haywood

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

SUBJECT: COPPER FLAT MINE  
Draft EIS

Dear Mr. Haywood,

I have had the opportunity to review the Draft Environmental Impact Statement for the proposed Copper Flat Mine as prepared by New Mexico Copper Corporation. I would like to offer the following minor comments in support of the project and the resumption of mining activities at the historic mine site.

- The draft report appears to be thorough and diligently and professionally prepared.
- NEPA guidelines for the development of the project alternatives appear to have been followed with the development of a project description that appears both practical and sensible.
- A review of the environmental effects (Section 3.3.2) indicated no contributions by the project to a violation of any Federal, State, or local regulation associated with emissions, climate, or sustainability. In that some grazing reduction may occur in the immediate area during the years of mine operation, it could be argued that there may be an air quality improvement with any reduction of methane gas generators, i.e. cows.
- Impact of surface water depletion years after mine closure appears insignificant (0.13%) at Las Animas and Percha Creek and minimal (0.8%) at Caballo Lake.
- Impact on groundwater, while significant, appears temporary and appears to decrease gradually to a minimal impact.
- Impact to wildlife and migratory birds appears minimal during development and mining activities. A complete reclamation program at closure may improve habitats compared to existing conditions due to more stringent standards.
- Implementation of a reclamation plan, at mine closure, to current standards and regulations may improve wildlife, migratory bird, invasive species control, wetland development, and visual impacts.
- The open pit mine operation is similar to the previously permitted operation and appears typical of other approved mine operations.
- The selected flotation process for the plant appears to be typical of other approved mine operations.

- The reagents listed for use in the process plant appear to be typical of other approved mine operations.
- The tailings disposal design appears to be typical of other approved mine operations.
- Third Party design for such activities as the stormwater management plan, tailings dam, closure plan, and other project requirements appears to have been professionally sourced and developed.
- A substantial number of direct jobs will be created by the opening of the mine. The DEIS indicates staffing level of 170 employees. This must surely be welcome in this area of New Mexico. It is noted that 70% of the employees may originate locally. Opponents to the project should be tasked with replacing the loss of these jobs should the project not be approved as a result of their efforts.
- A substantial number of indirect jobs have also been identified as created to support the construction and operating activities. Opponents to the project should be tasked with replacing the loss of these jobs should the project not be approved as a result of their efforts.
- It would be interesting to see a comparison of the number of jobs provided by the mine on a per acre basis with some of the adjoining ranches.
- A substantial tax contribution to the state and county, and perhaps other entities, will be realized. It would be interesting to see a tax revenue comparison on a “per acre” basis for the mine construction and operation compared with some of the adjoining ranches and other commercial activities. The DEIS indicates over \$1.8billion will be spent over the mine life, including closure/reclamation. Opponents to the project should be tasked with replacing the loss of this revenue should the project not be approved as a result of their efforts.
- One of the areas highlighted in the BLM’S Mission Statement is to sustain the productivity of the public land – the development of the Copper Flat project, in an area that was previously mined and currently dormant, is definitely responsible stewardship of public land. The land, in its current state, is not productive. With development of the project the land will become immensely productive.

Thank you for the opportunity to review the Draft EIS for the Copper Flat Mine. I hope the project is advanced through the remaining permitting steps as it is apparent that the development of the project will have a significant, positive impact on the social and economic environment of the region.

Respectfully submitted,

Alan L. Wilder

Ex 6