

Comments of the draft Environmental Impact Statement for the proposed Copper Flat Copper Mine

The document, in general, does not conform to BLM's own guidance for an EIS. My comments fall into four general categories. The most important, in my opinion, is the fourth category which deals with the groundwater flow model (Modflow) presented in the EIS. In a desert, in a draught, with agriculture and populated areas nearby, the BLM must pay serious attention to the mine's intended groundwater use and its effect on other necessary use of water.

1. The region of influence/impact (ROI) in the EIS is poorly defined. In those areas mentioned, such as Hillsboro, they are grossly in error in terms of both the number and character of the residents. The data about Hillsboro has no relationship to reality, and everyone else in the area has been ignored.
2. State Route 152 is part of the Lake Valley Backcountry Byway and Geronimo Trail Scenic Byway (receiving national status in 2005). It is also part of the Southern coast to coast cross country route for long distance bicyclists. What will be the impact of the mine and the truck traffic on these trails? The question is related to economic impact, scenic environmental impact, as well as infrastructure damage.
3. The economic impacts discussed in the dEIS are all positive. Negative economic impacts are also required as part of an EIS. Negative impacts should be specific and include such things as maintenance of highway, negative impact to tourism and fewer middle class retirees moving to this rural environment for the peace and quiet.
What percentage of those employed by the mine will be hired outside of local communities because they fill specialized jobs? Additionally, the 'boom and bust' nature of copper mining in southern NM, as characterized by the Chino mines, is not addressed. At what copper price will operations be suspended?

Ground Water Model:

As a former geologist for the New Jersey Department of Environmental Protection for 20 years, I reviewed numerous ground water flow models and do not believe this model is accurate.

First, the data used to run Modflow are not included in the dEIS.

How was this flow model reviewed? What qualifications does the reviewer have to conduct the review? Why was there no discussion in the EIS of the procedure to derive the flow model?

Having obtained a copy of *MODEL OF GROUNDWATER FLOW IN THE ANIMAS UPLIFT AND PALOMAS BASIN, COPPER FLAT PROJECT, SIERRA COUNTY, NEW MEXICO* (February 2014), and reviewed the general discussion regarding the model, I have several comments about this model that, I believe should make it unacceptable.

The model shows a feature between the mine and the Rio Grande River that was named the “Palomas Graben.” I have found no reference to this feature in the geological literature and do not think it is generally accepted as existing. The “graben” is used as a boundary feature, postulated to fit data from the 2012 pump test (see p. 50 and map p. 52).

The model also shows a drop in ground water level of 200 feet over a distance of approximately ½ mile, south of Route 152 (p. 59), apparently resulting from an impermeable barrier to groundwater flow. There does not appear to be any evidence to back up this supposition. Page 36, fig. 5.15 depicts a map of wells used in the pump test; none of the monitoring wells are west of the feature that is supposed to be the cause the steep gradient of the groundwater table. This lack of evidence invalidates the assumption that drinking water in Hillsboro and the environs will not be affected by the mine's use of production wells.

Section 6.4.2 Historical Transient Simulation seems to be pure fantasy. There is no relationship between historical measurements and simulations in several of the monitoring wells.

The modeling using unspecified data does not conform to the NEPA requirement for 'best available scientific information' and cannot be used to support an impacts determination, when that determination is for significant impacts. This model should be reevaluated and probably rejected. One does not construct a scientific model based on wishful thinking, or invent data to conform to hoped-for results.

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