

# Michael Green

AZDEQ,

I had previously sent an email regarding the Air Quality permit that was requested by ADI. This time, I'm contacting you about ground water usage by ADI and my concerns regarding the amount of water that ADI will be using from the aquifer. On Sept. 10, 2025, AZDEQ was granted legal authority by the EPA (Federal Environmental Protection Agency) to manage the Federal Underground Injection Control (UIC) program in Arizona. This new responsibility puts AZDEQ in direct control and has given AZDEQ more responsive oversight of groundwater protections.

Groundwater and well oversight is especially critical in the state of Arizona, and I am sure AZDEQ has heard and received multiple concerns, orally and in writing, from the residents of Benson, AZ concerning the amount of water that is going to be used by ADI. I actually do not know the exact amount of water that ADI is going to be using and I believe that AZDEQ does not know either. But I believe it is going to be an excessively significant amount. Don't you think that this would be a critical statistic to get 100% accurate before issuing any kind of permits for ADI? This now falls under AZDEQ purview. AZDEQ can not run away from this responsibility, that AZDEQ had requested on their own. Now you must take the ground water usage into consideration. We all know how fragile the water situation is in AZ.

As stated in one of the public hearings in Benson, AZ (that my wife and I attended), AZDEQ was established under the Environmental Quality Act of 1986 as the state entity for protecting and enhancing public health and the environment of Arizona. I believe it is both a health and environmental issue if the wells of the City of Benson and the surrounding private lands run out of water. This responsibility is now in your hands, and I hope that the members of AZDEQ do not blindly allow ADI to use monumental amounts of water that will damage Benson and the surrounding private land owners. We know that the track record for AZDEQ for denying a permit is non-existent, since a permit has never been denied by AZDEQ. Which seriously makes me ask, then why do you even exist??? If AZDEQ didn't exist, nothing would have changed with any of the past companies that had requested permits. I'm basically saying that you essentially are not needed then. I'm not trying to be confrontational with AZDEQ, but that is basically a fact. I implore that AZDEQ takes the water consumption by ADI seriously and take a long hard look at the precious aquifer along the San Pedro River. If there is not enough water available, then deny ADI being able to build their plant in Benson. Hopefully ADI will gather their own aquifer statistics and not rely on ones provided by ADI or any entity associated with ADI. Please use a third party or gather your own information. Thank you.