

Jerralynn Krinks

Dear Bernice Manuelito,

Thank you for the chance to submit comments on the Copper World project's draft aquifer-protection permit. I'm concerned that the plan design proposed in Hudbay Minerals' application is significantly less protective of Arizona's public health, environment and groundwater than the designs submitted by the previous owners of the Rosemont Mine.

This is not acceptable for any company in light of water resource shortages here in Arizona, as well as thinking that taking wildlife habitat is acceptable to those who live here.

Hudbay Minerals' application proposes to use water to convey tailings in a slurry pipeline, operate an unlined tailings facility, leave waste-rock dumps uncovered at closure, and deploy inadequate monitoring systems. The planned processing facilities, including a heap leach for processing significant amounts of acid, will be much closer to Tucson and Sahuarita's municipal water supplies and rural domestic wells than previously suggested. That is not acceptable as water is highly valued and protected in these cities.

The current draft permit proposed by the Arizona Department of Environmental Quality appears to be dangerously indulgent of the polluter at the expense of people and the environment. That's extremely unacceptable. So I request that the Arizona Department of Environmental Quality protects the state's water and public health by including the following stringent requirements in the aquifer-protection permit:

1. Hudbay Minerals must complete an economic and practical evaluation of tailings-storage facilities alternatives, including a lined and dry-stacked facility, among other potential redesigns.
2. Hudbay Minerals must include the entire east pit and the headwaters of small streams near the Broadtop Butte and Copper World pits in the Pollutant Management Area for Copper World's Phase 1, which will provide the best chance of detecting contaminants.
3. Hudbay Minerals must establish two additional point-of-compliance wells to ensure that the east-side aquifer isn't impaired by operations at the east pit.
4. The Arizona Department of Environmental Quality must define a minimum frequency of waste-rock acid content analysis for continued operations following the first year. More content analysis is better.
5. Hudbay Minerals must submit to biannual rather than biennial monitoring of the expanded list of parameters listed in Table 20 in the APP — which will aid in detection of pollutants that may otherwise go undetected for too long and delay an investigation into the pollution and the implementation of a remedy.

Finally, I request better deployment of industry-standard technologies by Hudbay Minerals for minimizing pollution, and I ask that the Arizona Department of Environmental Quality require the additional permit conditions, requirements and agency reviews detailed in the technical comments submitted by Pima County staff to your agency on March 11, 2024.

Thank you again for allowing comments on this. Hudbay Minerals must accept that mining in

Arizona is unique due to lack of abundance of resources and our need to preserve unique wildlife habitat. The company headquarters isnt here and doesn't have to face the mine everyday. Hudbay Minerals does not prioritize Arizona's best interests in their plans. Mining today must be done responsibly and with respect to where the mine is.

Sincerely,Jerralynn KrinksAZ 85745-1563