

Emily Modelmog

Dear Bernice Manuelito,

I am a resident of Santa Cruz County, AZ, and we are having a very similar conversation regarding the Hermosa Project in Patagonia. Why are you allowing these foreign mining companies to take or ruin all of our natural resources? What are you getting out of these deals that makes you willing to sacrifice our health and well being? Please protect Arizona's water and air quality as well as our precious biodiversity so that Arizonans can continue to enjoy our beautiful surroundings for generations to come. If we stay on this track and approve all of these lax permits, our state will not be fit for human or animal life for very long. Choose wisely.

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.

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.

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 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.
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.

Sincerely, Emily ModellmogAZ 85648-3240