

# Mary Jo Sheldon-DiVito

Dear Bernice Manuelito,

Thank you for the chance to submit comments on the Copper World project's draft aquifer-protection permit. This mine will use 10,000 gallons of water a day (more than the City of Tucson.) They will deplete the water table and have minimal requirements to monitor polluting the water table. Pima County has over 1,000,000 residents who are looking at having to drink waste water while this mine is using our precious ground water. This company is a bad actor who has left multiple abandoned mines that weren't cleaned up. Why do you want this for Southern Arizona, right next to a big population base?

I have the feeling that ADEQ represents the mine and is not protecting Arizona citizens. Former Gov. Ducey attempted to gut the clean water standards and other items to facilitate the Rosemont Mine. The federal government wasn't going to give them a water permit. I attended many of the ADEQ meetings and was told that there isn't much that can be done if the ground water is polluted. Why are you giving a Canadian mining company carte blanche to do whatever they want?

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, Mary Jo Sheldon-DiVito AZ 85718-1268