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ENVIR. APPEALS BOARD

John L. Anderson
2631 N. Presidential Dr.
Florence, AZ 85132-6671
(520) 840-1573
ila@johnlanderson.com

January 18, 2017

Eurika Durr
USEPA
1200 Pennsylvania Ave
Mail Code 1103M
Washington, DC 20460

Subject: Certificate of Service

Dear Ms. Durr,

Attached are copies of documents I sent to:

USAEPA Pacific Southwest Region 9
Hawthorne St.
San Francisco, CA 94105

Please let me know if you need more information.

Regards,


John L. Anderson

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Hawthorne St.
San Francisco, CA 94105

Please let me know if you need more information.

Regards,

A handwritten signature in black ink that reads "John L. Anderson". The signature is written in a cursive style with a large, sweeping initial "J".

John L. Anderson

John L. Anderson
2631 N. Presidential Dr.
Florence, AZ 85132-6671
(520) 840-1573
jla@johnlanderson.com

January 18, 2017

USAEPA Pacific Southwest Region 9
Hawthorne St.
San Francisco, CA 94105

I received a telephone call today asking that I forward you a copy of enclosed complaint of December 28, 2016.

I have also enclosed a copy of the Certificate of Service that I am mailing to:

Eurika Durr
USEPA
1200 Pennsylvania Ave
Mail Code 1103M
Washington, DC 20460

Please let me know if you need more information.

Regards,

John L. Anderson

John L. Anderson
2631 N. Presidential Dr.
Florence, AZ 85132
jla@johnlanderson.com
December 28, 2016

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1200 Pennsylvania Avenue, NW
Mail Code 1103M
Washington, DC 20460-0001

Subject: Issuance of the Class III In-Situ Production of Copper Permit No. R9UIC-AZ3-FY11-1

It is difficult to understand how agencies within the U.S. Government and the State of Arizona could approve any type of in-situ mining in or near an aquifer that is used for drinking water and farming. The proposed Florence Copper, Inc. will be polluting the same aquifer that supplies drinking water to my community. The mine well is within one mile of residential community wells and agriculture wells. Also, the EPA did not respond to my specific concerns and comments made at the hearing held in Florence on January 22, 2015.

The U.S. Geological Survey has numerous studies and documents reporting on the adverse environmental effects of in-situ recovery mines. Most of their data is on uranium and coal mines. While the target ores may differ, the process is similar and the acid extraction and contamination will also be similar with in-situ copper mining. I have attached a sample document which shows a table of the heavy metals that were released by the in-situ process. These releases are a non-recoverable contamination of the aquifer. There has never been an in-situ mine where the aquifer was recovered to drinking water standards during or after the mine was abandoned.

Attached is a better and more specific article that was published by the Arizona Geological Survey, Recovery of Copper by Solution Mining Methods, Contributed Report CR-15-A, August 2015. Some interesting observations is that the report does address Conoco's decision to abandon the mine at the Florence site (see page 5.) More to the point of why the project should not be allowed are the 'CONS' on page 6. Any one of these 'CONS' should justify disapproval of this project:

- Loss of leach solutions can result in ground water contamination, reduced metal recovery and loss of reagents.
- Planning and development of solution mining projects requires considerable field testing, which sometimes proves to be difficult and costly.
- Both physical and chemical constraints limit its application to a few sites, where conditions are favorable.

- Total copper recoveries are generally less than conventional methods.
- Time required for metal extraction is generally greater than conventional mining and processing.
- Like conventional heap leach operations, in-situ methods only recover copper. They are unable to recover by-product metals (i.e. molybdenum, gold and silver).
- By its very nature, solution mining technology relies on hydrological models and predictions. It is generally very difficult to observe what is really happening below the earth's surface.
- Solution flow patterns are very difficult to accurately quantify, engineer and control.
- Solution mining works best under saturated conditions.
- Leachable deposits are not always located below the water table. *
- Environmental management works best when the ore body can be isolated from adjacent aquifers**

*The copper is within the water table per Florence, Inc. documents.

**The aquifers used by the proposed mine are the same aquifers used by bordering communities and farms.

The EPA engineers told me at our meeting in Florence that their model showed the migration from the proposed mine would not reach the well that services my community for twenty years. EPA openly admitted their model showed migration. It may not affect me personally, but what about my children?

This project must be stopped.

Respectfully,



John L. Anderson

