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

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ENVIR. APPEALS BOARD

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 byproduct 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 aguifers**

**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

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



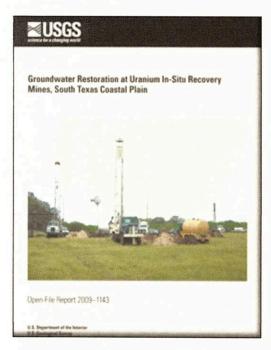
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Open-File Report 2009-1143

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Groundwater Restoration at Uranium In-Situ Recovery Mines, South Texas Coastal Plain

By Susan Hall



Abstract

This talk was presented by U.S. Geological Survey (USGS) geologist Susan Hall on May 11, 2009, at the Uranium 2009 conference in Keystone, Colorado, and on May 12, 2009, as part of an underground injection control track presentation at the Texas Commission on Environmental Quality (TCEQ) Environmental Trade Fair and Conference in Austin, Texas.

Texas has been the location of the greatest number of uranium in-situ recovery

(ISR) mines in the United States and was the incubator for the development of alkaline leach technology in this country. For that reason, the author chose to focus on the effectiveness of restoration at ISR mines by examining legacy mines developed in Texas. The best source for accurate information about restoration at Texas ISR mines is housed at the TCEQ offices in Austin. The bulk of this research is an analysis of those records.

First posted July 14, 2009

Report PDF (3.2 MB)

For additional information contact:

Team Chief Scientist, USGS Central Energy Resources Team Box 25046, Mail Stop 939 Denver, CO 80225 http://energy.cr.usgs.gov/

Part or all of this report is presented in Portable Document Format (PDF); the latest version of Adobe Reader or similar software is required to view it. Download the latest version of Adobe Reader, free of charge.

Suggested citation:

Hall, Susan, 2009, Groundwater restoration at uranium in-situ recovery mines, south Texas coastal plain: U.S. Geological Survey Open-File Report 2009–1143, 32 p.

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ISR	Vline	s - Const	ituer	its w	ith FF	$^{\prime}$ A M(Is	
								may sering
Baseline Groundwater Charact	teristics of U.S	. Uranium ISL Projects	No. of Contract of		Economic States	Industrial Automatic	PERSONAL PROPERTY.	
Chemical Constituent (mg/L unless stated	EPA MCL	Texas Baseline Range (71-77 PAAs)	Texas - Number of PAAs		New Mexico		Wyoming	Nebraska
			Where Aver	age Baseline	Crown Point ISL Pilot	Colorado Grover ISL Pilot	(SR WF1, CR MU2-6, Irigaray MU1- 5)	(MU 1-5 & R&D Site)
otherwise)				L/total # of				
			PAAs & p	ercentage				
JSEPA Primary Maximum Con	taminant Leve	els (MCLs):				Tarlong Later		Water St.
Arsenic	0.010	0.0010 - 0.2000	45/73	62%	0.004	0.01	0.006	0.001
Barium	2			2 1 1 A C S	0.1	0.03	0.073	0.10
Cadmium	0.005	0.0001 - 0.126	21/73	29%	0.006	0.002	0.016	0.006
Chromium	0.1				0.007	0.003	0.259	0.01
Copper	1.3			2000	0.01	0.06	0.043	0.012
Cyanide	0.2		-		0.088			
Fluoride	4	0.2 - 2.0	0/73	0%	0.39	0.7	0.307	0.69
Gross Alpha (pCi/L)	15	•	STATE STATE			87.67		A. D. B.
Gross Beta (millirems/year)	4					15.23		
ead	0.015	0.001 - 1.970	35/73	48%	0.003	0.02	0.038	0.032
Mercury	0.002	0.00003 - 0.44500	6/73	8%	0.00024	0.0002	0.001	0.0007
Vitrate	10	0.01 - 12.0	1/77	1%	0.09	1.4	3.01	0.07
Vitrite	1						0.168	0.004
Radium (²²⁶⁻⁸⁻²²⁸ Ra: pCi/L)	5	5.45 - 1536.5	71/71	100%	<14.1	13.4	293.15	405.4
Selenium	0.05	0.001 - 0.600	7/73	10%	0.01	0.01	0.015	0.002
Jranium	0.03	0.002 - 2.913	66/73	90%	0.01	0.086	0.193	0.103

Baseline Characterization of Groundwater in U.S. ISRWell Fields

Baseline standards for all 77 Texas PAAs can be used to characterize Texas ISR well fields that serve as a basis of comparison with baseline values determined for other ISR well fields in the United States. The argument is commonly made that before mining, groundwater in ISR well fields is so contaminated that it should not be used for human consumption. Before mining, these aquifers are typically granted exemptions from the Clean Water Act, termed aquifer exemptions, by the U.S. Environmental Protection Agency (USEPA).

In Texas, more than 25 percent of PAAs are characterized by baseline groundwater above the maximum contaminant level (MQL) for arsenic, cadmium, lead, radium, and uranium (shown highlighted on Table 4). MQL is set by the U.S. Environmental Protection Agency (USEPA;

http://www.epa.gov/safewater/contaminants/index.html) for those elements with well-established links to negative human health effects. All PAAs contain radium above MQL, and 90 percent contain uranium above MQL. Although baseline is artificially elevated in this database because the operator is selecting the highest average value within the production or mine area, this value does serve to identify elements of concern in these well fields.

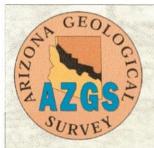
In the Crown Point pilot project in New Mexico, only cadmium was elevated above MCL. At the Grover pilot project in Colorado, baseline water showed gross alpha, gross beta, radium, and uranium above MCL. In Wyoming, averaged values for the Smith Ranch 1, Christensen Ranch 2-6, and Irigaray 1-5 mine units were elevated above MCL for cadmium, chromium, lead, radium, and uranium.

In Nebraska (Crow Butte mine units 1-5 and the Crow Butte R&D site), average cadmium, lead, radium, and uranium were elevated above MQL Elements above MQL are highlighted in the table.

With the exception of the New Mexico deposit (Crown Point), these well fields are characterized by groundwater elevated in multiple MCLs prior to mining. Radium is almost always elevated above MCL while uranium is typically elevated and cadmium and lead commonly elevated. These well fields would require pretreatment to be used as a source for drinking water.

	Contract State	line Grou	nuvva	ater i	11 U.3	. IOK I	viiiie	· >
Constitu	ients	with EPA	Seco	ndar	v (red	omm	end	ed)
			anda					
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Baseline Groundwater Chara	cteristics of U.S	. Uranium ISL Projects	Marchelly & A					
Chemical Constituent (mg/L unless stated otherwise)	EPA Secondary Standard	Texas Baseline Range (71- 77 PAAs)	Texas - Number of PAAs Where Average Baseline Exceeds Secondary Standards/rotal # of PAAs & Percentage (reight)gheed is - JSN of PAAs Exceed Secondary Scandards)		New Mexico Crown Point ISL Pilot	Colorado Grover ISL Pilot	Wyoming (SR WF1, CR MUZ-6, Ingerey MU3- SI	Nebraska Crow Butte (MU 1-5 & R&D Site)
								Regulation of
EPA Secondary Recommende	rd Standards:	I a second						I and the second
Aluminum	0.200				0.02	0.537	0.117	-
Chloride	250	122.5 - 3505.0	64/77	83 %	20.3	7	9.8	202.6
tron	0.30	0.01-6.3	32/72	44%	0.67	0.7	0.648	0.04
Manganese	0.05	0.01 - 5.06	37/73	51%	0.05	0.02	0.018	0.03
Silver	0.10				<0.01	0.003		
Sulfate	250	10.3 - 1197	10/77	13%	38	38.3	300	353
Total Dissolved Solids	500	628 - 6349	73/73	100%	357	295	616	1177
							-	0.017

Recommended secondary standards are set by the USEPA for constituents that, in high enough concentrations, negatively affect the esthetic quality of groundwater, but are not conclusively linked to any negative human health effect. Of those elements for which secondary standards are set by the USEPA, iron, sulfate, and total dissolved solids (TDS) are commonly elevated above recommended levels in pre-mining water at ISR facilities. Chloride and manganese are commonly high in Texas PAAs before mining, while TDS is elevated above the recommended standard in all pre-mining Texas PAAs. Elements elevated above secondary standards are highlighted in Table 5.



Recovery of Copper by Solution Mining Methods

David F. Briggs Economic Geologist



In-place leaching of rubblized and terraced walls of the Oxide pit at the Silver Bell mine, Pima County, Arizona (Satellite Photo from Google Earth - 12/20/2014)

CONTRIBUTED REPORT CR-15-A

August 2015

Arizona Geological Survey

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M. Lee Allison, State Geologist and Director

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Recovery of Copper by SoluCon Mining Methods

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Introduc@on

Solu@on mining is a mining prac@e that employs solu@ons (i.e. water or dilute acid) to recover a desired commodity from an ore deposit where it stands without also extrac@ng the rock. There are essen@ally two types of solu@on mining: 1) in-situ and 2) in-place. In-place solu@on mining employs permeability enhancement techniques such as blas@ng or previous mining ac@vi@es (i.e. block-caving) to fragment or increase the permeability of the rock prior to applying a leaching solu@on to liberate a desired commodity from the ore. In-situ methods rely solely on the naturally occurring permeability of the ores.

Copper as well as a number of other commodi@es are harvested by solu@on mining methods. Water-soluble salts such as potash (sylvite), rock salt (halite), thenardite (sodium sulfate) and nahcolite (sodium bicarbonate) are commonly derived from massive sedimentary deposits by in-situ methods. Prior to 2000, mining opera@ons in the Gulf of Mexico region recovered sulfur by a solu@on mining method, known as the Frasch process, which injected superheated water to melt the sulfur so it can be pumped to the surface (Christensen et. al., 1991). Approximately

ninety percent of the uranium mined in the United States is also recovered by soluOon mining methods (U. S. Energy InformaOon Agency, 2013).

How SoluCon Mining of Copper Works

Solu@on mining of copper replicates a natural process of dissolu@on and reprecipita@on that has occurred for millions of years and con Chuestoday. Known as supergene enrichment, this natural process has been observed at many of the world's copper deposits. It occurs when hypogene (i.e. primary) ores, containing sull de minerals such as pyrite (FeS.), chalcopyrite (QuFeS.) and bornite (QueFeS,), are oxidized as these rocks are exposed to chemical weathering. During the oxidaCon process, iron contained within these minerals is transformed into red. reddish brown, orange and yellow-colored iron oxides. while sulfur is combined with groundwater to produce a weak sulfuric acid solu@on. Copper within the rock is dissolved in the acidic solucons as it percolates downward to the water table, where reducing condicons (i.e. oxygenpoor environment) promote copper precipita@n as chalcocite (Qu,S). Over One, this acon forms an oxidized zone (i.e. leached cap) above a thick, copper-rich blanketshaped zone, known as an enrichment blanket. It is the presence of large enrichment blankets (as shown in Figure 1) at many of the world's porphyry copper systems that make it economical to mine the copper contained within these deposits (Guilbert and Park, 1986).

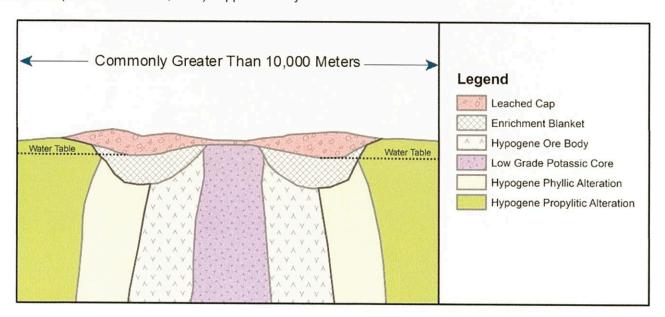


Figure 1: Simplit ed cross-section through a porphyry copper system showing supergene/hypogene alteration and mineralization (modit ed from Gilbert and Park (1986)

Solu@on mining replicates the natural process of oxida@on and reduc@on, described above. Dilute acidic solu@ons are introduced to the copper-bearing ores, causing dissolu@on of soluble copper minerals (Table 1) remaining in the leached cap and underlying enrichment blanket. This produces a "pregnant" solu@on that is collected and transferred to surface processing facili@es, where the copper is recovered.

Table 1: Common soluble copper-bearing minerals

Mineral Name	Chemical Composi⊕on				
Antlerite	Ou ₃ SO ₄ (OH) ₄				
Atacamite	Cu ₂ CI(OH) ₃				
Azurite	$\text{Cu}_3(\text{CO}_3)_2(\text{OH})_2$				
Brochanete	Ou ₄ SO ₄ (OH) ₆				
Chalcanthite	0.50,5H2O				
Chalcocite	OJ₂S				
Chrysocolla	Ou(Fe,Mn)O _x -SO ₂ -H ₂ O				
Cuprite	Cu ₂ O				
Malachite	01003 01(OH)2				
Tenorite	QIO .				

Thick mature, oxida@n prol les (i.e. leach caps) accompanied by well-developed zones of supergene enrichment are promoted by long uninterrupted periods of supergene ac@vity, which generally last at least 3 to 9 million years. Op@mum development occurs in regions characterized by hot, semi-arid to rainy climates that experience tectonically induced upliŌto depress water tables; progressively exposing sull des to weathering processes. The preserva@n of thick oxida@n prol les is dependent on erosion rates, that do not exceed the supergene processes (Sllitoe, 2005).

This set ng is ideal for development of large deposits that are amenable to solucon mining methods. More than 50% of the world's mined copper is derived from supergene ores located in the central Andes and southwestern North American porphyry copper provinces (Sillitoe, 2005). Many copper projects in southwestern North American have either used this technology or have been considered potencal candidates for its use (Figure 2).

soluOn mining operaOns are designed to maximize copper recovery at a parOcular locality, while complying with all regulatory standards set forth in the permits that govern the design and operaOn of these projects (Weeks and Millenacker, 1988). A number of methods are employed to achieve this goal.

In-place solu@on mining opera@ons at the Miami Mine in Arizona extracted copper from a broken and fragmented zone located above a closed, underground block-caving operacon (Figure 3), where nearly 75% of the leachable copper is present as chalcocite (Carstensen and Neira. 1997). A dilute sulfuric acid-ferric sulfate solu@on (0.5% H,SO,) was applied using perforated pipes laid out over the surface above the ore body and by a series of shallow injecCon wells that introduced soluCons below the Gila Conglomerate east of the Miami fault (Fletcher, 1985). The copper-bearing solu@ons were recovered from sumps located on the 1,000-foot level of the underground mine workings and pumped to the surface, where the copper was iniOally recovered by precipitaOon onto On cans or scrap iron and later by solvent extrac@on-electrowinning (SX-EW) methods (Ahlness and Pojar, 1983).

In-place leaching ac evices at Asarco's Silver Bell Mine northwest of Tucson, extract copper from low-grade

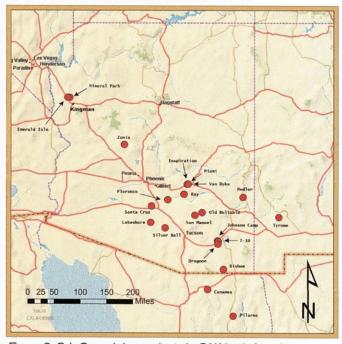


Figure 2: Solu@on mining projects in SW North America

surface ores, which remain in the walls of the open pits that do not support the cost of further stripping (Figure 4). Each of the rubble leach panels are drilled to the base of the zone of supergene enrichment (up to 240 feet) with 9-inch blast holes. This is done on a retreachg basis, which creates a hydraulic gradient from lower to higher benches. A \bar{C} er the drill pa Σ ern has been blasted, the rubble leach panel is ripped and terraced by bulldozers prior to applying the leach solucon with sprinklers. The copper-bearing solucons \tilde{N} by gravity to the bo Σ om of the open pit, where they are recovered and pumped to a processing plant that employs SX-EW technology (Browne and Miller, 2002).

Supplemening producion from convenional heap leach operation, the in-place rubble leaching project at Silver Bell is estimated to recover 20 to 25% of the contained copper. The relatively low recovery achieved by this method is most likely due to the presence of insoluble hypogene copper sull des, inadequate contact of the leach solutions with soluble copper minerals (i.e. channeling) and poor oxygenation (O'Gorman et. al., 2004).

This process became known as the "cementa@n process", which is apparently derived from the Spanish word "cementación", meaning precipita@n. Over the next three centuries, it was the primary method used to recover dissolved copper from dilute leach solu@ns, before being replaced by solvent extrac@n-electrowinning (SX-EW) technology, which saw its Į rst commercial applica@on at Ranchers Explora@on and Development Corpora@on's Bluebird mine (Miami, Arizona) in 1968 (Power, 1985).

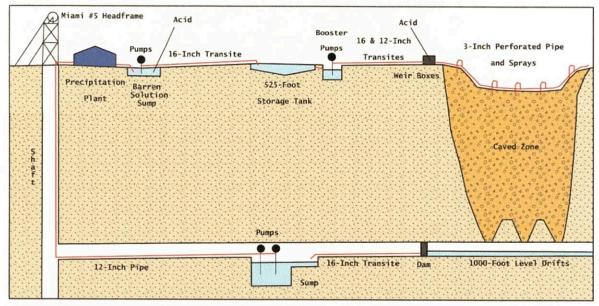


Figure 3: Schema@c cross sec@on of Miami Copper in-place leaching opera@on (modil ed from Fletcher, 1971).

The proposed in-situ project at Florence, Arizona will introduce dilute sulfuric acid solu@ons (99.7% water and 0.3% H₂SO₂ by volume) via injecton wells to the copperbearing ores, which are characterized by highly fractured bedrock that contains chrysocolla, lesser amounts of tenorite, cuprite and na@ve copper with trace amounts of azurite and brochanete (Figure 5). Lying within the saturated zone beneath the water table, the movement of these Nuids through the rock will be controlled by pumping the solucons from neighboring recovery wells, which will create a hydraulic gradient that causes the introduced solu@ons to Now from the injec@on wells to adjacent recovery wells (Sherer, 2011). A Der being pumped to the surface, the copper-bearing soluCons will be processed by solvent extrac@on and electrowinning technology to recover the dissolved copper and produce a marketable copper cathode product (M3 Engineering and Technology CorporaCon, 2013).

A Brief History of Copper Recovery by Solu-On Mining Methods

As early as the 1670, copper-bearing mine waters at the Ro Tinto mine in Spain were known to chemically precipitate copper onto iron (Arbiter and Retcher, 1994).

The presence of dissolved copper in waters of Bingham Creek near Salt Lake City, Utah was I rst noted in 1885. leading prospectors to construct sluices that were | lled with scrap iron. The stream Now was then diverted through these sluices. Over a period of six to ten weeks, the iron was replaced by masses of metallic copper that assayed approximately 85% pure copper (Krahulec, 1997). This was one of the earliest commercial applicaCons of in-situ leaching of copper-bearing ores in the U.S. The dissolved copper recovered by this opera@on was derived from the natural oxidaCon and leaching of sull de mineralizaCon in a major porphyry copper deposit located in the headwaters of Bingham Creek. This is the present site of the largescale, open pit opera@on at Bingham Canyon, which commenced operacons in 1906 and conclues to produce approximately 15 to 25% of U. S. copper.

The recovery of copper through passive in-situ methods such as those used at Bingham Canyon during the 1880s eventually led to a more action approach, where water from underground mine sumps was applied to the ores and the resulting copper-bearing solutions collected and the copper recovered. One of the earliest a Σ empts that employed this technique occurred in the Morenci Mining District of Arizona at the Medler mine from 1906 und

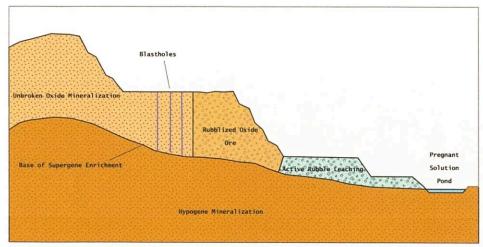


Figure 4: Schema@c cross sec@on of in-place leaching opera@ons at SIver Bell (modiļ ed from Browne and Miller, 2002)

1909. This in-situ project involved Nooding the driŌs on the second level of the underground Medler mine and allowing the solucons to percolate downward to the third level, where they were collected and transferred to a precipitacon plant for treatment (Ahlness and Pojar, 1983).

The producevity of solution mining techniques is directly dependent on the soluCon's contact with the soluble copper-bearing minerals and its ability to circulate throughout the ore. Pracecal applicaeon of these concepts evolved into one of the most produceve uses of solueon mining employed by the copper industry to date; the recovery of copper from ores that have already been broken and fragmented by previous mining ac Ovity. Primarily employed in a secondary or tereary role, this method has mainly been used to supplement produceon from exiseng operaeons or to recover residual copper a\(\tilde{O}\)er conven\(\theta\)onal mining opera Θ ons have ceased. The Į rst a Σ empts to use this in-place technique occurred at the Ohio Mine in the Bingham Canyon Mining District in 1922 and

the Brooks Mine in the Robinson Mining District

located near By, Nevada in 1925.

During the 1930s, miners at Anaconda Minerals' $Bu\Sigma e$ opera Θ on in Montana discovered that water used to I ght underground I res dissolved signiI cant amounts of copper. This led to the prac Θ e of recovering copper from low grade waste rock that was used to back-I lled stopes at the Leonard, Mountain Con and Steward mines. Leaching of underground stopes at $Bu\Sigma e$ was discon Θ onued, when a more produc Θ ve technique of recovering copper from surface dumps was introduced in 1964 (Ahlness and Pojar, 1983).

One of the most long-lived and produceve in-place solueon mining projects occurred at the Miami Copper Mine located in Gila County, Arizona. Small scale operaCons began in an abandoned porcon of this underground mine in December 1941 (Retcher, 1971). Full scale solu@on mining opera@ons took place a\(\tilde{O}\)er conven\(\tilde{O}\)onal underground mining ceased in June 1959 and conclued to recover copper und commercial leaching acOviOes were suspended in 2013. Over its seventy-one year life, the esemated produceon at this inplace solu@on mining project was approximately 693 million lbs. of

copper, represeneng 22.4% of the total produceon from the Miami project (1911-2013).

Other in-place solu@on mining projects located in Arizona, New Mexico and Sonora that have produced copper from broken and fragmented rocks located above block-caving

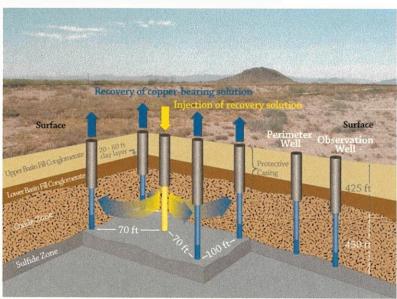


Figure 5: Schema@c cross-sec@on of proposed Florence in-situlleach project (Hoī man et. al, 2012)

opera@ons include: Ray (1937-1961), Tyrone (1941-1949), Pilares (1946-1960), Inspira@on (1965-1974), Lakeshore (1983-1994) and San Manuel (1995-2002).

Another approach to in-place solu@on mining of copperbearing ores was to fragment the ores by blas@ng prior to conduc@ng leaching opera@ons. This method was ini@ally tested during the 1970s at several small in-place projects: including the Old Reliable mine (1972-1981) near Mammoth, Arizona; the Zonia project (1973-1975) located south of Presco Σ, Arizona; and the Big Mike mine (1973-1979) in Pershing County, Nevada (Ahlness and Pojar, 1983). Over Gme, blascing and fragmencing ore has gradually been occurring at an ever increasing scale. At Mineral Park (1981-1994), near Kingman, Arizona, it was used to rubblize low-grade oxide ores contained in the walls of the open pits. This approach of further fragmencing before leaching in-place is ongoing at the Slver Bell project (1996-present) located northwest of Tucson.

During the Į nal decades of the twenθeth century, interest in soluθon mining of copper resulted in a number of joint research eī orts involving the mining industry and the United states Bureau of Mines. Stes evaluated include: Emerald Isle (1974-1975), Johnson Camp (1977) and Mineral Park (1993). Substanθal research was focused on ASAROO/ Freeport McMoRan's Santa Cruz property (1988-1999) located northwest of Casa Grande, Arizona (O'Neil, 1991 and United states Bureau of Mines, 1994). This project studied the feasibility of in-situ mining a large, high grade, copper oxide resource, located at a depth of 1,250 to 2,360 feet (Weber, Barter and Kreis, 2000). Although this eī ort was not deemed commercially viable, the data and knowledge obtained from this research project has beneļ Σed other in-situ programs.

Since the mid-1970s, the evalua@on of the commercial feasibility of soluCon mining copper from naturally occurring ores without fragmenta@on prior to leaching has been ongoing. In addicton to the Santa Cruz project. other Arizona projects that fall into this category include Van Dyke (1976-present), Florence (1992-present), I-10 (2010-present) and Dragoon (2010-present). The insitu program at Bisbee (1975-2002 (?)) was designed to recover residual copper remaining in the Lavender pit and underground workings of the Campbell mine following the suspension of commercial production in June 1975 (Ahlness and Pojar, 1983). In addi@on to its in-place solu@on mining opera@ons, the San Manuel project also employed in-situ methods (1986-2002) to recover copper from oxidized grani C host rocks lying outside of the perimeter of the caved zone (Briggs, 2014).

Solu@on Mining Versus Conven@onal Methods

Copper mining operacons employ convencional mining methods (i.e. open pit, underground), solucon mining methods (i.e. in-place, in-situ leaching) or a combinacon of these methods. Factors that determine how a parcular ore deposit is mined vary from site to site include:

- Endepth and spa@al distribu@on of the ore body
- ore and gangue mineralogy of the host rocks
- Ennature of the mineralizaCon (i.e. disseminated, fracture-controlled)
- Ettenor of the mineraliza@on
- [s] geotechnical character of the rocks (i.e. competency)
- E**posicon of water table (i.e. saturated versus unsaturated)
- Empermeability and porosity of the ores
- Encapital expenditures, opera@nal and reclama@n costs
- "environmental impacts.

The pros and cons of solu@on mining are summarized in Table 2. The costs of stripping restrict conven@onal open pit mining methods to sites where the ore bodies are located close to the surface. Other factors include the grade of the ores, geotechnical character of the rocks (i.e. angle of pit slopes and stripping ra@os) and posi@on of water table (i.e. dewatering costs). More expensive underground mining methods are constrained by similar factors. Following the discovery of the Horence deposit in 1969, Conoco ini@ally envisioned developing this resource as a large open pit (Hoag, 1996). However, economic factors related to the depth of overburden, competency of the oxide ores, low tenor of the mineraliza@on and poten@al impacts related to dewatering ruled out the use of conven@onal mining methods at this site.

Solu@on mining methods cannot be used to recover copper from hypogene ores that contain insoluble copperbearing minerals, such as chalcopyrite and bornite. These ores have to be mined by conven@onal mining methods and processed through a NotaCon mill, which produces a concentrate product that must be further treated (i.e. smel@ng and rel ning) to produce a marketable product. Like conven@onal mining opera@ons that employ heap leaching, solu@on mining opera@ons only recover copper from soluble minerals, such as chrysocolla, brochancte, azurite, malachite and chalcocite. Composicon of the gangue mineralogy of the ores is also important. The presence of signil cant amounts calcite or other soluble minerals can signil cantly impact the economic viability of solu-Con mining projects. One of the most dix cult challenges facing Excelsior's Gunnison project (aka I-10 and Dragoon) is the presence of signil cant amounts of calcite, contained within the copper-bearing skarn host rocks (M3 Engineering and Technology CorporaCon, 2014). Its presence not only increases the amount of sulfuric acid required to treat the ores, increasing costs, but also will result in the precipitacon of gypsum within the fractures and pore spaces. This results in two problems. The gypsum coats the copper minerals within the fractures isola@ng them from the leach

Table 2: Pros and cons of solu@on mining of copper (modil ed from Bhappu, 1985 and O'Gorman et. al. 2004)

Pros Pros	Cons
Smaller, ephemeral, environmental footprint with less surface disturbance (waste dumps, tailings ponds, etc.) and less water and air pollu@on than conven@onal mining projects.	Loss of leach solu@ons can result in ground water contamina@on, reduced metal recovery and loss of reagents.
Reclamacon can be progressively performed throughout the life of the operacon, allowing it to the funded by operacon's cash Now.	Planning and development of solu@on mining projects requires considerable eld tes@ng, which some@mes proves to be dik cult and costly.
OperaOng and total costs are generally less than convenOonal mining methods.	Both physical and chemical constraints limit its applicacon to a few sites, where condicons are favorable.
Can be used at sites that are not economic to mine by conven@onal mining methods. Total energy consump@on is less than conven@onal	Total copper recoveries are generally less than conven@onal methods. Time required for metal extrac@on is generally greater
mining methods.	than conveneonal mining and processing.
Total water consumpcon is less than convenconal methods as a result of reduced evaporacon and eliminacon of water contained within convenconal tailings impoundments	Like conven@onal heap leach opera@ons, in-situ methods only recover copper. They are unable to recover byproduct metals (i.e. molybdenum, gold and silver).
tailings impoundments. Employs SX-EW technology, which or ers several advantages over the older and more costly pyrometallurgical processes (i.e. smel@ng) employed at some conven@onal mining projects. Can be used in conjunc@on with exis@ng conven@onal	By its very nature, solu@n mining technology relies on hydrological models and predic@ns. It is generally very dik cult to observe what is really happening below the earth's surface.
mining operacons increasing the overall prol tability of the project.	Solu@on Ňow paΣerns are very dix cult to accurately quan@fy, engineer and control.
IniGal capital costs are significantly less than sustaining capital expenditures, allowing a higher percentage of its total capital costs to be funded by the operacon's cash Now	Solu@on mining works best under saturated condi@ons. Leachable deposits are not always located below the water table.
Can be used at sites where pre-exiseng, surface infrastructure (i.e. highways, railroad, towns) is present.	Environmental management works best when the ore body can be isolated from adjacent aquifers.

solucons; thereby reducing their ability to dissolve the copper (i.e. reduces copper recovery). It also I lls the fractures, impeding the Now of the solucons through the rock, interfering with the solucon mining operacon.

Unlike conven@onal mining projects, the successful applica@on of in-place/in-situ mining methods requires a porous and permeable host, which allow the leach solu@ons to freely migrate through the rock. This porosity and permeability can be man-made or natural. Many types of copper deposits occur within rela@vely impervious hosts, where the natural permeability of the rock is primarily dependent on the density of open fractures. Leach solu@ons must come in physical contact with the soluble copper-bearing minerals; making copper ores dominated by fracture-controlled mineraliza@on more favorable than ores where the copper minerals are disseminated throughout the rock.

This is illustrated by tests that have been conducted at two Arizona copper deposits; Santa Cruz and Florence. The

geological set ng of each of these deposits is similar with the ores being hosted primarily by Precambrian Granite and Laramide porphyries of granodiori& to quartz monzoni& composi&n. Both lie beneath a thick sec&on of post-mineral alluvial sediments that characterize the Basin and Range province. Oxide mineraliza&on is fracture-controlled and consists of soluble copper oxides. Neither of these sites has had historical mining ac&vity. Both occur below the water table and rely solely on the natural porosity and permeability of the host rocks to transfer the leach solu&ons from the injec&on to recovery wells.

Located at a depth of 1,200 to 2,360 feet, the oxide ores at Santa Cruz contain very few fractures (1 to 2 fractures per foot); making their permeability very low (Dahl, 1989). On the other hand, the high permeability of the very strongly broken oxide ores at Florence (depths - 425 to 1,200 feet) are characterized by numerous open fractures (11 to 15 fractures per foot), making it a more favorable candidate for in-situ leaching (M3 Engineering and Technology Corporaeon, 2013a).

Overall copper recovery is also dependent on the exciency of the "sweep" of the leach solu@ons through the rock. Solu@on mining projects that occur beneath the water table are generally more excient than those occurring above the water table, with projected total copper recoveries of 35 to 70% compared to less than 35% for unsaturated condi@ons. Contrast this with copper recoveries at conven@onal heap leach opera@ons, which generally range from 70 to 85% (Dhawan et. al., 2012), while conven@onal milling projects vary from 75 to 95% (United States Congress, 1988).

Under saturated condi⊕ons a hydraulic gradient can be created allowing the leach solu⊕ons to thoroughly permeate the rock as they move from the injec⊕on to recovery wells. Under unsaturated condi⊕ons (i.e. above the water table) leach solu⊕ons tend to percolate downward under the force of gravity; commonly being nega⊕vely impacted by channeling of the solu⊕ons (as discussed above at Slver Bell), which can leave signiĮ cant volumes of the rock unexposed to the leach solu⊕ons. In general, the more surface area of the rock exposed to the leach solu⊕ons the be∑er.

Solu@on mining projects can be developed at sites, where pre-exis@ng infrastructure, such as highways, railroads or town sites, would prohibit the use of conven@onal mining methods. Excelsior Mining's I-10 deposit (part of the Gunnison project, aka North &ar) lies beneath Interstate 10, approximately 2.5 miles northeast of Texas Canyon, while the Dragoon deposit (also a part of the Gunnison

Solu@on mining techniques have been commercially employed to recover copper in North America for more than 100 years. Historically, this process has been primarily used to supplement produc@on derived by other processing methods (i.e. San Manuel, Mineral Park, Inspira@on, Sliver Bell, Bu Σ e and Cananea) or has been employed in a ter@ary or salvage role to produce copper at projects where conven@onal mining ac@vi@es have ceased (i.e. Miami, Bisbee, Lakeshore, Tyrone and Pilares). Beneļ @ng from the presence of exis@ng infrastructure, the economics of such projects make them very a Σ rac@ve, because they enhance the overall prol tability of the mining opera@on. Furthermore, the cash Now from these projects can be used to help fund reclama@on ac@vi@es at sites where commercial mining ac@vi@es have ceased.

Advancements in science and technology combined with the increased costs of conveneonal mining and compliance with environmental regulaeons are such that at today's copper prices there are real opportunies to develop stand-alone, in-situ solueon mines at sites that have had no previous mining acevity. Candidates for this approach include Florence, Santa Cruz and Gunnison projects Note: Abbreviaeons for the Type of Operaeon include: conveneonal open pit/heap leach (Conv OP/HL), conveneonal open pit/mill (Conv OP/Mill) and conveneonal underground/mill (Conv UG/Mill). Inieal capital expenditures represents the percentage of inieal capital costs within the total projected life-of-mine capital expenditures. Rate of Return is before taxes.

Table 3: Economics of solu@on versus conven@onal mining methods

Project	LocaOon	Type of	Total	Ini@al	OperaOng	Total Costs	Rate
		Opera C on	Capital	Capital	Costs	(\$/lb Qu)	Of
			Costs	Costs	(\$/lb Qu)		Return
			(\$/lb Qu)	(%)			%
Horence	Pinal Co., Az	In-situ	0.481	(%) 23.2	0.799	1.590	35.8
Gunnison	Cochise Co., Az	In-situ	0.525	32.2	0.687	1.342	59.7
∃ Pilar	Sonora, Mexico	Conv OP/HL	0.431	63.4	1.326	1.783	52.9
MacArthur	Lyon Co., Nv	Conv OP/HL	0.509	61.2	1.891	2.553	29.3
Zonia	Yavapai Co., Az	Conv OP/HL	0.387	70.2	1.526	1.913	35.2
Ann Mason	Lyon Co., Nv	Conv OP/Mill	0.336	69.5	1.719	2.055	14.8
Copper Creek	Pinal Co., Az	Conv UG/Mill	0.530	71.4	1.805	2.421	11.8
Copper Flat	Serra Co., NM	Conv OP/Mill	0.535	85.2	1.614	2.340	23.3
Pumpkin Hollow	Lyon Co., Nv	Conv OP/Mill	0.441	55.0	1.818	2.308	20.2
Rosemont	Pima Co., Az	Conv OP/Mill	0.249	81.4	1.200	1.588	45.6

project, aka South Star) underlies the Southern PaciĮ c railroad right of way, about one mile southwest of the town of Dragoon, Arizona. Copper Fox's Van Dyke deposit lies 1,000 to 2,100 feet beneath the town of Miami, Arizona (Moose Mountain Technical Services, 2015).

Opera@ng costs include mining, processing, general and administra@ve expenses, shipping, smel@ng and rel ning costs. Total costs include opera@ng costs plus royal@es, severance and property taxes, reclama@on expenses and deprecia@on.

This conclusion is supported by economic data presented in Table 3. This comparison examines the esemated life-of-mine (LOM) capital expenditures, operaeng costs and total costs (US\$/Ib. of copper basis) and rate of returns (before taxes) for ten proposed North American mining projects. Raeos of inielal capital expenditures divided by total capital expenditures (%) for each project are also presented below. Data contained in this table was derived from cash Now models presented in recent NI 43-101 reports (2011-2014) I led with Canadian regulatory authories.

Analysis of Table 3 shows total capital expenditures for stand-alone, in-situ mining projects are compeæve with conveneonal mining projects; although located at the higher end of the range of costs. One of in-situ mining's advantages is the percentage of life-of-mine (LOM) capital expenditures required to bring a project on line (23-32%). It is significantly less than that required for conveneonal mining projects (55-85%); allowing a greater proporeon of the capital expenditures to be funded by the cash Now of the project.

turbed. Limited surface facilities associated with in-situ projects are easily removed and the site reclaimed with an ultimate goal of returning the land to productive use by the local community once mining actives have been completed.

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Figure 6. a) In-situ leach well Į eld (established during a produceon test by BHP Copper in 1997-1998) at Florence, Arizona. b) Conveneonal open pit operaeon at ASAROO's Mission mine near Tucson, Arizona

Both physical and chemical constraints limit the applicaeon of solueon mining technology to a few sites, where condicons are favorable (Figure 6a & b). Compeeove operaeng and total costs of stand-alone, in-situ leaching projects make them an aΣraceve opeon at sites where conveneonal mining methods are not possible.

Bene! ts from stand-alone, in-situ mining projects include employment opportuniæs as well as a source of tax revenues for state and local governments without the need to excavate a large open pit, its extensive waste dumps, conven@onal mill/heap leach faciliæs and tailings ponds with their associated high capital, opera@ng and reclama@on costs. In addi@on to the small, ephemeral, environmental footprint, the surface of the site remains rela@vely undis-

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