



# SAN JUAN COUNTY COMMISSION

Kenneth Maryboy                      Chairman  
Willie Grayeyes                      Vice-Chair  
Bruce Adams                          Commissioner  
Mack McDonald                      Administrator

December 1, 2020

Mr. Drummond Earley  
Utah Division of Water Quality  
P.O. Box 144870  
Salt Lake City, Utah 84114-4870

Re: Lisbon Valley Mining Company In Situ Copper Recovery Proposal

Dear Mr. Earley:

We thank you and the Division of Water Quality for holding the public hearing on Lisbon Valley Mine's application for an Underground Injection Control Class III Permit for in situ recovery of copper on November 24, 2020. This gave citizens the opportunity to formally present their statements on the proposal. However, we were hopeful that the hearing would have also provided an opportunity for questions to be asked and answered. Since a question and answer opportunity was not provided some of our comments that follow include questions which we hope you will answer.

San Juan County has concerns about the potential effects the proposed in situ mining may have on groundwater quality and quantity in the area. Several county residents including those residing in Lower Lisbon Valley have expressed their serious concerns about the potential adverse effects of in situ mining on water in the Burro Canyon aquifer. Residents with water wells in the area are especially concerned about the potential adverse effect of underground injection of an acid solution into the aquifer that supplies their domestic and livestock wells.

We understand from your presentation at the hearing and documents provided with the application that the Burro Canyon aquifer in Lower Lisbon Valley is basically contained in the valley by faults and geologic structure. We don't understand the rationale for the eastern boundary of the aquifer exemption. It appears to be a straight line running north/south whereas the other boundaries appear to follow topographic or fault lines. It is interesting that this eastern boundary is located a short distance west from the Wilcox well. We would like an explanation of how this boundary was determined.

The southern boundary of the aquifer exemption appears to include or be very close to the Stevenson well at the Three Step Hideaway. Is the Stevenson well inside or outside of the exemption area?

Regardless whether these private domestic wells are inside or near the exemption boundary, they are within the proposed in situ mining boundary. We share these well users concerns about potential contamination of their wells with the proposed mining solution.

Without more specific known likely effects of the proposed in situ mining operation on groundwater and more assurance that the proposed injection of a sulfuric acid solution into the ground water would not

have adverse effects on groundwater quality and quantity we cannot support and oppose the issuance of a permit for underground injection of a recovery fluid as stated on the current application from Lisbon Valley Mine.

We appreciate this opportunity to comment and look forward to your response and answers to our and residents questions.

Sincerely,

Kenneth Maryboy  
Chairman