

From: [Antone III, Willard \(RC\)](#)
To: [Brunsting, Cory - FS, PHOENIX, AZ](#)
Cc: [Donna Morey](#); [Victoria Boyne](#); [Chris Garrett](#); [Peacey, Victoria \(RC\)](#); [Jim Butler](#)
Subject: BLM Comment Responses RP53
Date: Monday, November 21, 2022 4:24:43 PM
Attachments:

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Dear Mr. Brunsting,

In response to item action item RP53 please see the comment below regarding the Subsidence Mitigation – Diversion Channels.

BLM Comment:

In BLM Comment Response WT19, which concerns mitigating lost flows to Queen Creek, the response states that through mitigation (measure FS-WR-04) lost flows would be replaced by direct input of water from existing wells. Since the loss of flows due to subsidence are a permanent feature of the post-mining landscape, are mitigation flows to Queen Creek planned to be permanent, or will this mitigation be like the mitigation planned for springs and GDEs, where after 10 years past active dewatering the mitigation could potentially cease. The BLM reviewers believe the response as written requires additional clarification to be adequate.

RC Response:

The GPO says on page 292 “To the extent practicable at closure, surface water diversions would be constructed to move stormwater away from the subsidence zone and into natural drainages. However, to the extent practicable, surface water diversions will be constructed to move stormwater away from the subsidence zone and into natural drainages.” The GPO is cited in the FEIS on page 232 and says “Many stormwater controls (diversion ditches, seepage collection ponds) need to stay in place permanently or for decades after closure of the mine to control water quality (analyzed in detail in section 3.7.2).” In the FEIS, Applicant committed mitigation measure PF-WR-02: Divert existing flows across the subsidence area to preserve downstream flows “before subsidence starts”. The Final Closure Plan we submitted in 2020, which covered the entire project says that “Diversion channels surround the EPS will be retained and to the extent practicable may be implemented at closure to divert stormwater from entering the crater.”

Based on the statements in the GPO, FEIS, and Closure Plan, it is the intent of Resolution Copper for the stormwater diversion around the subsidence area to be constructed prior to subsidence beginning, and to be permanent. The permanence is implied in the GPO (and FEIS analysis). The USFS might consider updating the PF-WR-02 mitigation measure to indicate that the diversion will be permanent as needed.

Should you have any questions or require further information please contact me.

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