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Comments: Please reject the Doe Run Company Lease Modifications MOBLMA 046975, MOBLMA 047447, and MOBLAM 079252.

There are many risks associated with these leases, the most concerning being water pollution. The collected groundwater from operations will be managed through existing tailing impoundments, mine ponds, and ultimately treated through one of the five water treatment plants along the Viburnum Trend. The water will then be discharged to either currently impaired waterways or recently delisted impaired waterways that had been polluted with lead.

These disposal areas are not safe and continue to pollute. Old lead tailing ponds continue to wreak havoc long after the minerals have been extracted and companies have moved on or are no longer operating. Discharging water back to impaired waterways will revert these waterways back to being lead polluted.

There are many other risks to water besides the water collected from operations. Oxidation effects associated with contact between the groundwater and mine roof after the cessation of underground mining will result in short-term changes in groundwater quality and chemistry including increases in levels of total dissolved solids and metals. The proposed solution, "dilution by continued inflows and contact mixing with undisturbed groundwater sources" is not acceptable. Once referred to as, "the solution to pollution is dilution," is no longer an acceptable form pollution control. How many parts per million of lead do you want in your child's drinking water?

Drilling fluids, products used during exploratory drilling operation, also contribution to the water safety issues. These drilling fluids contain the hazardous ingredients isopropyl alcohol (12 percent) and ethanol (4 percent). Just because the EPA nor Missouri DNR does not regulation the use of these fluids due to the "low order of toxicity" for ingestion, does not mean they should be ignored.

Besides the impact to water quality, the land will be scarred for the foreseeable future. Significant erosion will result from cutting down trees. The proposal replaces these trees with winter wheat; no new trees will be planted. Also, the new roads and sedimentation causes by the creation of drill sites will compact the soil and change its composition, leading to further erosion and destruction of the land.

Please reject these leases for the health of the citizens of Missouri, wildlife, and the overall environment.