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Dear Friends of Cayuga Lake,

This is an urgent reminder that the deadline for submitting comments on Cargill Incorporated's permit application for the Cayuga Salt Mine is approaching. In 2023, Cargill contracted the Deutsche Bank to sell the mine and last year they laid off the third shift, possibly for good. A broad-based multi-stakeholder request to the DEC by January 19th could be our final chance to hold them accountable for the long-term impacts that a subsiding salt under the lake may have on lake water quality and on shoreline properties.

Cargill's proposal to flood the abandoned S3 Zone of the mine beneath Cayuga Lake with wastewater poses significant risks to our communal resources. It is crucial that we voice our concerns to prevent potential pollution and ensure the stability of the mine and our environment.

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Comments Are Due By January 19th 2025

You can use the sample comment template below or draft your own comments. Send your comments to:

Comment.CayugaSaltMine2023@dec.ny.gov

or mail them to:

Jonathan Stercho NYSDEC Region 7 Headquarters 5786 Widewaters Pkwy Syracuse, NY 13214

We shouldn't allow Cargill to walk away with their profits and leave us to deal with the consequences. Please ensure your comments are received by January 19, 2025.

Re: Comments on Cargill's Application (0-9999-00075/00001) to Renew and Modify its Mined Land Reclamation Permit for the Cayuga Salt Mine

Cargill Incorporated is requesting from DEC a permit renewal and modification for its existing Cayuga Salt Mine Permit that would allow Cargill to flood the abandoned S3 Zone of the Mine beneath CayugaLake with wastewater. This is the first time that we are aware of Cargill proposing to dispose of wastewaters in areas of the Mine beneath Cayuga Lake. Cargill's

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Lake, including the following:

 Cargill proposes to store wastes that are not fully treated for safe subsurface disposal in violation of DEC's regulations and which are likely to degrade the stability of the S3 Zone;

- The S3 Zone where the flooding is proposed to occur was abandoned for mining by Cargill shortly after potential instability was identified in the area in 2011;
- The analysis that DEC is relying upon for its conclusion that the flooding will not destabilize the Mine did not account for the presence of pore water in the rock layers above the Mine and its potentially destabilizing effects;
- Cargill has not taken adequate measures to reduce the flow of wastewaters into its Mine, which have increased significantly over the past two decades, and thus Cargill's claimed "need" for disposal solutions will likely continue to increase with time;
- Cargill will not be able to monitor the S3 Zone of the Mine for stability after it is flooded, in contrast to every portion of the Mine; and
- Cargill has not provided information about whether it intends to store the wastes
 permanently after the Mine is closed, nor has it evaluated the long-term pollution impacts
 of such permanent disposal.

A mine collapse in the S3 Zone would occur under the Lake. The consequences of a mine collapse and subsequent flooding of the salt mine would be catastrophic. Even a minor roof collapse in the S3 Zone could lead to a rubble chimney, creating a hydraulic connection between the Mine and Cayuga Lake. Such an event would threaten the drinking supply for more than 100,000 people as the water would become more saline, potentially indefinitely. A similar event occurred when Lake Peigneur in Louisiana flooded a salt mine in 1980. Lake Peigneur's water has been too saline to drink since the event occurred.

We therefore request that Cargill's request for a permit modification and renewal be denied. In the alternative, we ask that an Environmental Impact Statement be prepared to fully evaluate the concerns identified above and that a public hearing be held to allow for further community input and education on these issues.

Please find detailed comments drafted by CLEAN HERE

Your participation is vital to protecting our community and environment. Let's ensure our voices are heard.

We appreciate your continued support. Tax-deductible donations can be made to CLEAN here.

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Thank you, Cayuga Lake Environmental Action Now

Clean the Lake. Protect the Lake.

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