

December 1, 2011

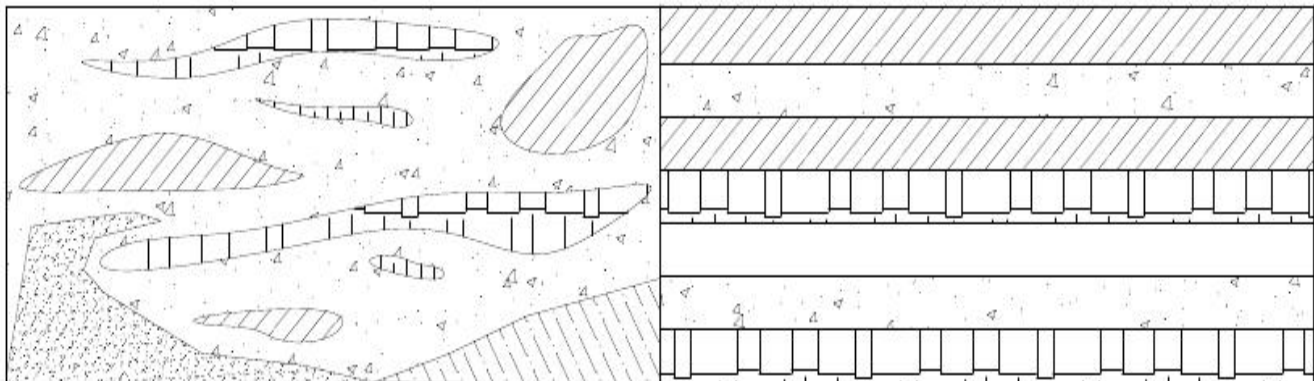
Jon Taylor, PE CEM
Nevada Division of Environmental Protection
Bureau of Waste Management
901 S. Stewart St., Suite 4001
Carson City, NV 90701-5249

Dear Mr. Taylor,

Many who oppose the proposed Jungo landfill are primarily concerned about the feasibility of Jungo Flat for that activity; indeed, due to relative elevation, ground and surface water conditions, complex soils and potential seismic activity the Jungo site does not appear to be suitable for a Class 1 landfill.

Recology hireling, Golder Assoc. evaluations, rather than ameliorating these concerns, have increased them to the point where a credible and independent investigation of the sites suitability is indicated before a permit can be issued. Golder has previously called their veracity into question on the matter of the Jungo landfill with such false claims as terming Desert Valley a "perched basin" and claiming that the prevailing winds blow east to west.

The graphic below is indicative of how Golder, throughout the permit application materials, manipulated the data. Berger in his USGS Water-Resources Report 95-41 19 (page 20) states, "In general, the basin fill deposits within the study area consists of discontinuous units and heterogeneous mixtures of gravel, sand, silt and clay and, as such, function as a single aquifer system" (represented by the left graphic). By extrapolating the borehole data over thousands of feet horizontally (represented by the right graphic) Golder presents a picture of a perfectly stratified subsurface structure that Berger expressly refutes.



By depicting a tightly structured soil stratigraphy, Golder can claim subsurface stability for construction and at the same time, if there is any failure of structural integrity of the landfill cells, can also claim a delineated natural barrier of clay layers to prevent aquifer contamination. Metaphorically, in the Jungo landfill application materials, Golder has been engaged in the practice of putting lipstick on a pig.

Berger [95-4119) indicates that a large volume of ground water is stored in the basin-~~ill~~ aquifer that would have, under pre-development conditions, exceeded 10 million acre feet (about half the water contained in Pyramid lake). This aquifer remains far too valuable a resource to the people of Nevada to risk because NDEP relied on Golder's biased evaluation. Reject this application.

Sincerely,
Richard Cook
4320 Paradise Ranches
Winnemucca, NV 89445