

Copper Quean Branch/Freeport-McMoRan Corporation 36 West Highway 92 Bisbee, Arizona 85603

July 19, 2010

Ms. Cynthia Campbell Water Quality Compliance Section Arizona Department of Environmental Quality 1110 West Washington Street Phoenix, Arizona 85007

Re: Mitigation Order on Consent No. P-121-07 Focused Bedrock Investigation Work Plan

Dear Ms. Campbell:

Freeport-McMoRan Corporation, Copper Queen Branch (CQB) has reviewed the Arizona Department of Environmental Quality (ADEQ) comments dated July 13, 2010 pertaining to the work plan for the focused bedrock investigation. CQB's responses to the comments are below.

- Aquifer testing will be conducted using the procedures described in Section 4.3.8 of Appendix F of the work plan for the Mitigation Order investigation.
- Video and acoustic televiewer surveys will be conducted on the bedrock portions of
 the boreholes of the two proposed monitoring wells as recommended by ADEQ
 because these methods can provide direct observations of geologic structures such as
 faults and bedding planes. If successful, the acoustic televiewer can provide
 quantitative estimates of the frequency and orientation of structures. Caliper,
 resistivity, gamma, and neutron surveys will not be conducted because they do not
 allow direct observations of geologic structures.

If you have any questions regarding these matters, please contact me or our project manager Stuart Brown.

Sincerely,

Rebecca A. Sawyer

Sr. Environmental Engineer

Freeport-McMoRan Corporation, Copper Queen Branch

¹ Hydro Geo Chem, Inc. 2008. Revision 1 Work Plan to Characterize and Mitigate Sulfate with respect to Drinking Water Supplies in the Vicinity of the Concentrator Tailing Storage Area, Cochise County, Arizona. July 3, 2008.

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cc: Michael Jaworski, Freeport-McMoRan Corporation, Copper Queen Branch Stuart Brown, Freeport-McMoRan Copper and Gold Inc. Jim Norris, Clear Creek Associates