



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

VIA CERTIFIED MAIL # 7008 1830 0002 0847 3119
Return Receipt Requested

August 10, 2011

Ms. Mindy Cross
Manager, Water Quality Compliance Section
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, Arizona 85007-2935

Re: Interim Action Discontinuation
ADWR Well No. 573596 (ROGERS596)
Mitigation Order on Consent No. P-121-07

Dear Ms Cross:

This letter is to report that Freeport-McMoRan Corporation, Copper Queen Branch (CQB) will discontinue the interim action of bottled drinking water for the private well ROGERS596 starting September 15, 2011 because the well is not the primary drinking water supply. The primary drinking water supply at the property is well ROGERS803 which is not in the sulfate plume. The ROGERS803 and ROGERS596 wells are located east of Naco Highway and north of Greenbush Draw at the west edge of the sulfate plume. The wells are owned by David Rogers at 1598 West Mule Deer Street, Naco, Arizona.

ROGERS596 was mistakenly believed to be the primary water supply when CQB submitted the interim action report¹ to Arizona Department of Environmental Quality (ADEQ) in December 2009. The following factors were unknown at the time the interim action report was filed:

- ROGERS803 is the primary drinking water supply well,
- ROGERS803 and ROGERS596 are both plumbed into the water supply system, and
- ROGERS596 is used only as an emergency backup supply.

ROGERS803 is outside of the sulfate plume based on fifteen (15) water samples collected from February 2008 to April 2011 that have had sulfate concentrations between 128 milligrams per liter (mg/L) and 211 mg/L. ROGERS596 well is in the sulfate plume with

¹ Correspondence from Rebecca Sawyer, Copper Queen Branch, to Cynthia Campbell, Arizona Department of Environmental Quality, Re: Interim Action Report ADWR Well No. 573596 (ROGERS 596). December 10, 2009.

sulfate concentrations ranging from 520 mg/L to 710 mg/L. The sulfate concentration data provided on the attached Table 1 and Figure 1 illustrate the differences between ROGERS596 and ROGERS803.

CQB will discontinue the interim action of bottled drinking water starting September 15, 2011 because sulfate concentrations are less than 250 mg/L in the primary drinking water supply, ROGERS803. With respect to ongoing water quality sampling, Section 4 of the work plan² indicates that water supplies with sulfate between 135 mg/L and 250 mg/L will be sampled monthly for four (4) months to identify any trend in sulfate over time and that a monitoring schedule will be developed based on the apparent trend. Although the sulfate concentration at ROGERS803 is between 135 mg/L and 250 mg/L, quarterly sampling will be retained and monthly sampling and trend analysis omitted because the existing record of water quality samples does not show an increasing trend.

Sincerely,



Rebecca A. Sawyer
Senior Environmental Engineer
Copper Queen Branch

cc: Michael Jaworski, Freeport-McMoRan Corporation, Copper Queen Branch
Sheila Deely, Freeport-McMoRan Copper & Gold Inc.
Stuart Brown, Freeport-McMoRan Copper & Gold Inc.
Dalva Moellenberg, Gallagher & Kennedy
James Norris, Clear Creek Associates.

² 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.

Sulfate Data for ROGERS596 and ROGERS803

Well Name	Sample Date	Sulfate, dissolved (mg/L)
ROGERS 803 (Primary Water Supply)	2/7/08	138
	4/21/08	128
	5/8/08	141
	6/23/08	129
	7/29/08	134
	8/28/08	128
	9/23/08	133
	10/22/08	144
	2/10/09	141
	4/29/09	211
	8/3/09	150
	7/16/10	169
	10/19/10	154
	10/19/10	154
	1/20/11	143
	4/8/11	160
ROGERS 596 (Backup Water Supply)	10/19/09	590
	11/5/09	540
	2/25/10	520
	4/22/10	710

Sulfate Concentrations at ROGERS596 and ROGERS803

