



**FREEPORT-McMoRAN
COPPER & GOLD**

Sierrita Operations
Environment, Land & Water Department
6200 West Duval Mine Road
PO Box 527
Green Valley, Arizona 85622-0527

February 29, 2012

Hand Delivered

Ms. Danielle Taber
Project Manager
Voluntary Remediation Program
Arizona Department of Environmental Quality
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Phoenix, AZ 85007

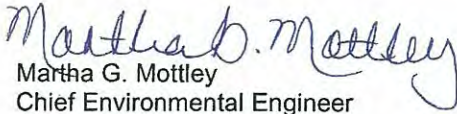
**Re: Voluntary Remediation Program – VRP Site Code: 100073-03
Work Plan for Training Facility Soil Excavation Project
Freeport-McMoRan Sierrita Inc.,
Green Valley, AZ**

Dear Ms. Taber:

Pursuant to our telephone conversation regarding work to be conducted at one of Freeport-McMoRan Sierrita Inc. (Sierrita) VRP areas, attached for your review is the Work Plan for the Training Facility Soil Excavation.

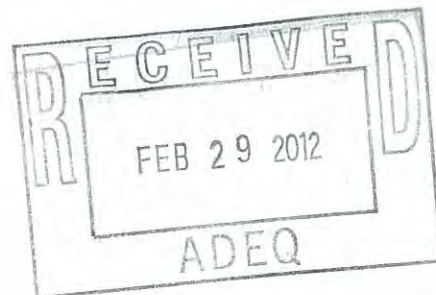
Should you need additional information please do not hesitate to contact me at (520) 393-2696 or 520-235-2497.

Sincerely,


Martha G. Mottley
Chief Environmental Engineer
Freeport-McMoRan Sierrita Inc.

MGM:ms
Attachments (1)
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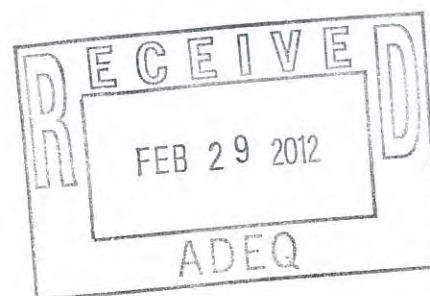
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**Freeport McMoRan Sierrita Inc.
Former CLEAR Plant Area
Soil Excavation Work Plan**

Voluntary Remediation Program

February 29, 2012





**Former CLEAR Plant Area
Soil Excavation Work Plan**

Voluntary Remediation Program

Prepared for:
Freeport McMoRan Sierrita Inc

Prepared by:
ARCADIS-US

Tel 602.438.0883
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Our Ref.:
AZ001233.0004

Date:
February 29, 2012

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1. Introduction	1
1.1 Site Description	1
1.2 Site Operations	2
1.3 Scope Work Plan	2
2. Soil Investigation Summary	2
3. New Training Facility Construction	3
4. Sampling and Analysis Plan	3
4.1 Training Facility Construction Soil Samples	4
4.1.1 Construction Soil Samples	4
4.1.2 Excess Soil Sampling	6
4.1.3 Analytical Methods	7
5. Field Activities	7
5.1 Employee Training Requirements	7
5.2 Sampling Procedures	7
5.2.1 Discrete Soil Samples	7
5.3 Decontamination	7
5.4 Investigation-Derived Waste Management	8
5.5 Sampling Corrective Action Process	8
5.6 Sample Designation	8
5.7 Sample Container, Volume, Preservatives and Holding Time	10
5.8 Sample Management and Tracking	10
5.9 Sample Analysis	10
5.10 Quality Control	10
5.11 Field Instrumentation	10
6. Project Organization	11
7. Data Quality Objectives	11
8. Analytical Laboratory Procedures	11

9. Data Review and Qualifications	11
10. Progress Reports	11
11. Intuition/Engineering Controls	11
12. Permits/Legal Requirements	12
13. Financial Capability of the Applicant	12
14. References	12

Tables

Table 1	Soil Characterization Results Training Facility Area
Table 2	Project Distribution List

Figures

Figure 1	Site Location Map
Figure 2	Training Facility Location Map
Figure 3	Training Facility Excavation Areas

1. Introduction

This work plan outlines proposed soil removal activities and confirmatory soil sampling and analysis to be conducted under the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) at the Freeport-McMoRan Sierrita Inc. (Sierrita) near Green Valley, Arizona (Figure 1). The soil removal activities will be in support of the construction of a new training facility located within the Former CLEAR Plant Area.

Sierrita retained URS Corporation (URS) to prepare and implement a site investigation work plan to characterize soil, sediment, and groundwater at the Sierrita Mine. The site investigation activities were conducted by URS in accordance with the VRP Investigation Work Plan (URS 2008a) and the Addendum to Sampling and Analysis Plan & Quality Assurance Project Plan (SAP/QAPP) (URS 2008b). Both plans were approved by the ADEQ VRP. A Soil and Sediment Characterization Report (SSCR) was completed in 2011 summarizing investigation activities including the Former CLEAR Plant Area (URS 2011). The SSCR has identified areas where constituents of interest (COI) were detected in soil at concentrations above non-residential soil remediation levels or groundwater protection levels (URS 2011).

1.1 Site Description

The Former CLEAR Plant was historically located in the north-central portion of the Sierrita property; in the area that is now utilized for an asset recovery yard, contractor offices and material storage, metal fabrication shop, and the Central Accumulation Building. The Former CLEAR Plant Building is currently utilized for storage of miscellaneous materials such as computers and office equipment. The building also is used as a training center.

The topography of the CLEAR Plant area generally slopes eastward and is incised by east-west trending drainages. The western portion of the area, where the new training facility will be located, is cut into bedrock. Fill ranging from a few inches to approximately 25 feet in thickness is present in the remaining area. In the western portion of the property where fill is thin or non-existent, bedrock is at or near surface, and outcrops of granodiorite are visible. Additional information about the Former CLEAR Plant area topography is located in the SSCR.

1.2 Site Operations

According to interviews with current and former employees, the CLEAR Plant was commissioned in 1975, from 1977 to 1983 the CLEAR Plant produced metallic copper, and in 1995 it was demolished. Additional information about the CLEAR Plant operations is included in the SSCR (URS, 2011).

1.3 Scope Work Plan

This work plan will address an approximately 1.3 acres located north of the Former CLEAR Plant Building (Figure 2) along the western edge of the CLEAR Plant subarea defined in the SSCR. The area has most recently been utilized as an asset recovery yard to store used equipment, machinery, and vehicles. According to interviews with current and former employees, this area contained a number of aboveground CLEAR Plant process tanks (URS 2011). No traces of the aboveground process tanks are currently evident.

2. Soil Investigation Summary

Initial soil characterization activities were conducted between August and October 2004 at the Former CLEAR Plant and additional soil characterization was performed between July and August of 2008. The soil investigation activities included the sampling and analysis of soil samples collected from the Former CLEAR Plant Area as well as several other subareas on the Sierrita property.

The focus of the previous site characterization activities was on suspected or known releases of COIs. The soil and sediment COIs selected for analysis include mining-related total metals (antimony, arsenic, barium, beryllium, cadmium, chromium, calcium, cobalt, copper, lead, manganese, mercury, molybdenum, nickel, selenium, thallium, and zinc), total uranium, uranium isotopes (uranium-234, uranium-235, and uranium-238), and radium isotopes (radium-226 and radium-228). Many of these constituents occur naturally in soils, rocks, and groundwater at non-mineralized and mineralized mine sites (URS 2011). However within the Former CLEAR Plant Area, where 78 soil samples from 34 locations were collected, only arsenic, copper, and lead concentration were detected above their respective non-residential soil remediation level (nr-SRL) or the groundwater protection level (GPL).

Based on the results of the soil and sediment characterization, soil samples will be evaluated for arsenic, copper, and lead and compared to nr-SRLs and GPLs for the

purposes of this work plan. Soil samples will be compared to nr-SRLs and GPLs because Sierrita has not yet completed a site-specific risk assessment.

Figure 3 displays the location of soil samples reported in the SSCR relative to the location of the new training facility. In total, 10 soil samples were collected within the footprint and within 50 yards of the new training facility location. Within the new training facility footprint, three soil sample locations had sample concentrations that exceeded nr-SRL for arsenic, copper or lead or the GPL for lead (Table 1). Exceedences occurred at CP-T-3 at depths of 0.75 and 8 feet below grade surface (ft bgs) and at CP-16 from 0 to 0.25 ft bgs. One soil sample collected outside of the new training facility's footprint, CP-15, exceeded a nr-SRL for arsenic at a depth of 0-0.25 ft bgs. Soil analytical results within and around (<50 yards) of the new training facility building footprint are located in Table 1. Soil samples that exceeded nr-SRLs or GPLs and are in the Former Clear Plant Area are located in Table 1.

3. New Training Facility Construction

As stated previously this work plan was prepared in support of the construction of new training facility which will include an approximately 8,000 square feet building and parking lot located in the Former CLEAR Plant Area (Figure 2). Construction of the new training facility will require the removal of approximately 32 cubic yards of soil from foundation footer locations. The footer excavation areas run along the perimeter of the training facility and will be 1.5 ft wide and 2 ft bgs deep. Additionally, on the south side of the new training facility, another soil excavation will be required to remove approximately 613 cubic yards of soils that have been determined to be geotechnically unstable to support the building foundation. This southern excavation area will range from 3 to 5 ft bgs in depth in an area approximately 36 feet long by 115 feet wide. The southern excavation area will be backfilled with clean engineered fill.

4. Sampling and Analysis Plan

The training facility construction activities will include the disturbance of soil, as discussed in Section 3. The following Sections 4 and 5 discuss soil management procedures for potentially-impacted soil encountered during and following these construction activities. The field activities will follow the SAP/QAPP submitted by URS on behalf of Sierrita in September 2008 (URS 2008b). Deviations from the SAP/QAPP are described in the following sections. In addition, administrative and project information addendums to the SAP/QAPP are included in Table 2.

4.1 Training Facility Construction Soil Samples

The following is a summary of proposed confirmatory soil samples to be collected within the new training facility footprint.

4.1.1 Construction Soil Samples

Soil samples from the proposed construction area will be collect in the following areas: the footer excavation area, the southern excavation area, the building footprint area where the structure’s foundation will be poured, and from the future parking lot area. Three discrete soil samples will be collected from the bottom of the north, east, and west footer excavation area. The southern excavation area will be divided in half and two discrete samples will be collected from the bottom of each half. Four discrete sidewall samples will be collected from the north, east, south, and west side of the excavation area. Side wall samples will be collected from mid-depth, between 1.5 to 2.5 ft bgs for a 3 to 5 ft bgs excavation. One discrete surface sample will be collected within the building footprint area. The training facility’s future parking lot area will wrap around the north, east, and west sides of the training facility building, and three discrete surface samples will be collected from those area. One sample will be collected from the north, east, and west future parking lot areas. Table 4-1 summarizes the planned grid soil samples.

Table 4.1 Construction Samples Summary

Area	Sample Location	Sample Depth (ft bgs)	Analysis
Footer Excavation	Bottom of North Excavation Trench	2	Total Metals: Arsenic, Lead, and Copper
Footer Excavation	Bottom of East Excavation Trench	2	Total Metals: Arsenic, Lead, and Copper
Footer Excavation	Bottom of West Excavation Trench	2	Total Metals: Arsenic, Lead, and Copper
Southern Excavation	Bottom of Excavation	3-5	Total Metals: Arsenic, Lead, and Copper
Southern Excavation	Bottom of Excavation	3-5	Total Metals: Arsenic, Lead, and Copper
Southern Excavation	North Sidewall	1.5-2.5	Total Metals: Arsenic, Lead, and Copper

Area	Sample Location	Sample Depth (ft bgs)	Analysis
Southern Excavation	West Side Wall	1.5-2.5	Total Metals: Arsenic, Lead, and Copper
Southern Excavation	South Side Wall	1.5-2.5	Total Metals: Arsenic, Lead, and Copper
Southern Excavation	East Side Wall	1.5-2.5	Total Metals: Arsenic, Lead, and Copper
Building Footprint	Surface	0-0.3	Total Metals: Arsenic, Lead, and Copper
Parking Lot Area	North Surface Sample	0-0.3	Total Metals: Arsenic, Lead, and Copper
Parking Lot Area	West Surface Sample	0-0.3	Total Metals: Arsenic, Lead, and Copper
Parking Lot Area	East Surface Sample	0-0.3	Total Metals: Arsenic, Lead, and Copper

Two additional sample locations have been identified based on previous sampling results contained in the SSCR. Previous soil sampling general locations will be identified using a GPS hand held device and visual evidence. A discrete soil sample will be collected near the CP-T-3 sample location. Following the removal of soil, in the southern excavation area, a discrete sidewall sample, approximately 2.5 ft bgs, will be collected near the location of CP-16. Table 4-2 summarizes the planned additional soil samples.

Table 4.2 Additional Samples Summary

Area	Sample Location	Sample Depth (ft bgs)	Analysis
Former CP-T-3 Location	Bottom of Excavation	2	Total Metals: Arsenic, Lead, and Copper
Former CP-16 Location	South Sidewall of Excavation	2.5	Total Metals: Arsenic, Lead, and Copper

Based on the results of the collected soil samples, additional excavation and sampling may be performed to reduce constituent concentrations below the nr-SRLs or GPLs.

4.1.2 Excess Soil Sampling

Excess soil material will be sampled within one week of completion of the excavation. The number of samples to be collected is detailed in Table 4.3.

Table 4-3 Excess Soil Sampling Summary

Contaminant and Sample Type		
	Total Metals	
Soil Quantity	Grab	Composite
500-800 c.y.	6	2

Engineering judgment will be used to determine the most appropriate sampling locations in order to properly characterize the soil. Consideration will be given to how the soil was stockpiled, potential contamination characteristics, visible material changes, size of stockpile, and depth of stockpile. Excess soil will be collected to allow for potential TCLP analysis based on the total metals concentration.

Composite soil samples from excess soil stockpiles will be collected as follows:

- Using a disposable scoop place soil samples from four distinct location into a stainless steel bowl;
- Homogenize soil sample in stainless steel bowl with disposable scoop;
- Transfer the soil sample into the laboratory-supplied sample jars with a disposable scoop;
- Secure the cap and label the sample jars with the appropriate information; and
- Place filled containers in cooler on ice immediately.

Discrete soil samples from excess soil stockpiles will follow the sampling procedure outlined in Section 5.2.

4.1.3 Analytical Methods

The analytical methods and parameters specified for each soil sample consider the compounds or constituents identified during previous site characterization activities (see section 2.1). Soil samples will be submitted to ACZ Laboratories for:

- Arsenic, copper, and lead by EPA Method 6010B; and
- RCRA 8 metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver) by Toxic Characteristic Leaching Procedure (TCLP) SW-846 Method 1311.

5. Field Activities

Excavation equipment and personnel will be provided by Sierrita. Initial field activities will include obtaining utility clearances and mobilizing equipment to the site.

5.1 Employee Training Requirements

ARCADIS will adhere to the training requirements of the SAP/QAPP and Sierrita contractor and site specific requirements.

5.2 Sampling Procedures

5.2.1 Discrete Soil Samples

Discrete soil samples from within the training facility area will be collected as follows:

- Using a disposable scoop collect soil samples from the designated sample location;
- Transfer the soil sample into the laboratory-supplied sample jars with a disposable scoop;
- Secure the cap and label the sample jars with the appropriate information; and
- Place filled containers in cooler on ice immediately.

5.3 Decontamination

Most soil samples will be collected using disposable plastic scoops that are intended for one time use and will not require decontamination. Non-disposable sampling equipment, such as a stainless steel bowl, will be decontaminated as follows:

- Wash with detergent solution (such as Alconox® and water) to remove all visible particles and any residual material;
- Rinse with tap water; and
- Rinse with deionized water.

5.4 Investigation-Derived Waste Management

The excavated material will be stored on a combination of the former cooling tower pad due south of the Copper Sulfate facility and surrounding 10 mil polyethylene liner. This pad is constructed of 8-inch concrete with an estimated 4 inches of compacted subgrade aggregate. This pad has a secondary containment which provides an area of 1920 ft². An additional 20 feet by 80 feet polyethylene liner will be utilized in sections with a surrounding berm to act as secondary containment located adjacent to the cooling tower concrete pad. This material will be covered and stored temporarily while waiting for the results of the analytical testing. The material will be sampled within one week of completion of the excavation.

Upon receipt of the analytical results, a material determination will be made. It is anticipated the material will have a high copper content as indicated in the previous sampling conducted. In the event the recoverable copper concentrations exceed Sierrita's average ore grade, the material will be placed in the appropriate copper recovery process (SX/EW or Mill/Concentration). If the material is determined not to be beneficial to copper recovery and exceeds one or more TCLP limit, nr-SRL constituents, or GPLs, the material will be containerized and sent to an approved permitted landfill. If the results neither exceed the nr-SRLs, TCLP, or the recoverable copper grade, the material will be used as landfill cover at Sierrita.

5.5 Sampling Corrective Action Process

ARCADIS will follow SAP/QAPP guidelines.

5.6 Sample Designation

Samples collected will be identified with a sample label in addition to an entry on a chain-of-custody form and field notebook. Each sample will be identified with a unique sample number that designates the sample location in the prefix, as well as the sample type, orientation (if applicable), depth and number. The abbreviations that will be used in the sample identifications are as follows:

**Table 5-1.
Sample Identification Abbreviations**

Abbreviation	Definition
<i>Sample Area/Type</i>	
CPS	Clear Plant Southern Excavation Area
CPF	Clear Plant Footer Excavation Area
CPB	Clear Plant Building Footprint Area
CPP	Clear Plant Parking Lot Area
CPE	Clear Plant Excavated Soil
RCP-16	Previous sample location of interest (CP-16)
RCP-T-3	Previous sample location of interest (CP-T-3)
<i>Sample Location (if applicable)</i>	
A(N, S, E, W)	Area Orientation: North-N, South-S, East-E, West-W
SW(N, S, E, W)	Side Wall Sample- Orientation: North-N, South-S, East-E, West-W
<i>Sample Depth (if applicable)</i>	
D4	Depth, ft bgs
S	Surface

The following table provides some sample identification examples:

**Table 5-2.
Examples of Sample Identifications**

Sample Description	Example Sample ID
Third excavated soil sample	CPE-03
First east side wall sample from the southern excavation area collected 2.5 feet bgs	CPS-SWE-D2.5-01

Sample Description	Example Sample ID
First sample from the west footing excavation area collected 2 feet bgs	CPF-AW-D2-01
First surface sample located in the east parking lot area	CPP-AE-S-01
First surface sample located in the building footprint area	CPB-S-01
First sample collected near CP-16 at a depth of 3 feet	RCP-16-D3-01

5.7 Sample Container, Volume, Preservatives and Holding Time

ARCADIS will follow SAP/QAPP guidelines.

5.8 Sample Management and Tracking

ARCADIS will follow SAP/QAPP guidelines.

5.9 Sample Analysis

ARCADIS will follow SAP/QAPP guidelines with the exception that soil samples will be analyzed for total metals for arsenic, lead, and copper.

5.10 Quality Control

ARCADIS will follow SAP/QAPP guidelines with the exception that field duplicates will be collected at a frequency of once every 10 investigative soil samples collected. Equipment rinsate blanks and matrix spike/matrix duplicate will remain at the same frequency of one per 20 investigative soil samples.

5.11 Field Instrumentation

ARCADIS will follow SAP/QAPP guidelines.

6. Project Organization

Responsibilities for the Project Director (i.e., Project Manager), Task Manager, Quality Assurance (QA) Manager, and Field Task Managers remain the same as presented in the 2008 QAPP. An updated distribution list and project directory is included as Table 2.

7. Data Quality Objectives

The DQOs will remain the same as presented in the 2008 QAPP; however the proposed sampling listed in Appendix Table 4-1 in support of the DQOs has been modified based on the limited size and impacts of the excavation area. Please see the Sections 4 and 5 for the proposed sampling plan.

8. Analytical Laboratory Procedures

ARCADIS will follow procedures outlined within the SAP/QAPP.

9. Data Review and Qualifications

ARCADIS will follow procedures outlined within the SAP/QAPP.

10. Progress Reports

A written progress report will be provided to ADEQ within 45 days after receipt of final analytical results from the analytical laboratory

11. Intuition/Engineering Controls

Environmental control procedures will be developed and documented for use during soil excavation activities. The field activities described in this plan will all take place within the secure Sierrita property. Access to the property is restricted a 24-hour security guard. Proper personal protective equipment will be utilized during activities described in this work plan. This will consist of hand, foot, hearing, eye, and head protection at a minimum, when necessary. Workers not associated with the activities will be notified of the activities and kept at a safe distance.

These procedures will include (at a minimum):

- Site security and access requirements;
- Ingress and Egress routes and site entry/exit conditions for heavy equipment/trucks
(including decontamination and truck staging requirements);
- Truck loading and cover requirements;
- Dust control methods for stockpiled soils, soil excavation activities, and final grades;
- Dust monitoring; and
- Storm water control methods to prevent washout of stockpiled soils from designated areas.

12. Permits/Legal Requirements

The following permits or approvals (organized by regulatory authority) may be required for remedial action activities:

- ADEQ: Voluntary Remediation Program (VRP) Work Plan Approval
- Pima County: Air Quality Activity Permit

13. Financial Capability of the Applicant

Financial capability information is available on request.

14. References

- URS Corporation. 2008a. Voluntary Remediation Program (VRP) Investigation Work Plan, Freeport-McMoRan Sierrita Inc., Green Valley, Arizona. Volumes I and II. Prepared for Freeport-McMoRan Sierrita Inc. April.
- URS Corporation. 2008b. Addendum to Sampling & Analyses Plan (SAP) & Quality Assurance Project Plan (QAPP), Voluntary Remediation Program (VRP), Freeport-McMoRan Sierrita Green Valley, Arizona. Prepared for Freeport-McMoRan Sierrita Inc. September.

URS Corporation. 2011. Final Voluntary Remediation Program (VRP) Soil and Sediment Characterization Report, Freeport-McMoRan Sierrita Inc., Green Valley, Arizona. April.

Tables

Table 1
 Former CLEAR PLANT Soil Characterization Results near Work Plan Area
 Work Plan
 Freeport McMoRan Sierrita Operations

Area Description	Sample Name	Sample Date	Depth (feet)	Antimony (mg/kg)	Arsenic (mg/kg)	Copper (mg/kg)	Lead (mg/kg)	Notes
Clear Plant Area Soil Concentrations near the New Training Facility	CP-16	8/13/2004	0-0.25	11	34.9	109,000	950	Training Facility building will require soil removal to 5 ft bgs
	CP-T-3-0.5'	10/4/2004	0.5	NA	5.6	4,750	31.1	Bedrock suspected at 8 ft bgs; Training Facility building will require soil removal to 2 ft bgs
	CP-T-3-0.75'	10/4/2004	0.75	1.2	20.9	978	6.03	
	CP-T-3-8'	10/4/2004	8	NA	26.9	14100	488	
Within New Training Facility Footprint	CP-JS-02-00-01	7/15/2008	0-1	1	6.3	2,690	39.7	Bedrock suspected at 3 ft bgs; Training Facility building will require soil removal to 3 ft bgs
	CP-JS-02-01-03	7/15/2008	1-3	0.2	2.8	174	7.39	
	CP-13	8/13/2004	0-0.25	0.6	5.44	1,090	15.4	
Area Surrounding New Training Facility Footprint	CP-15	8/13/2004	0-0.25	1.9	13.7	8,260	116	
	CP-M06-00-01	7/11/2008	0-1	<1	2.6	207	7.76	Bedrock suspected at 3 ft bgs
	CP-M06-01-03	7/11/2008	1-3	0.2	3	200	8.17	
nr-SRL (mg/kg)	-	-	-	410	10	41,000	800	
GPL (mg/kg)	-	-	-	35	290	NE	290	

XX - Value Exceeds nr-SRL or GPL

NA - Not Available

NE - Not Established

nr-SRL - Non-Residential Soil Remediation Levels

GPL - Groundwater Protection Limit

mg/kg - milligram per kilogram

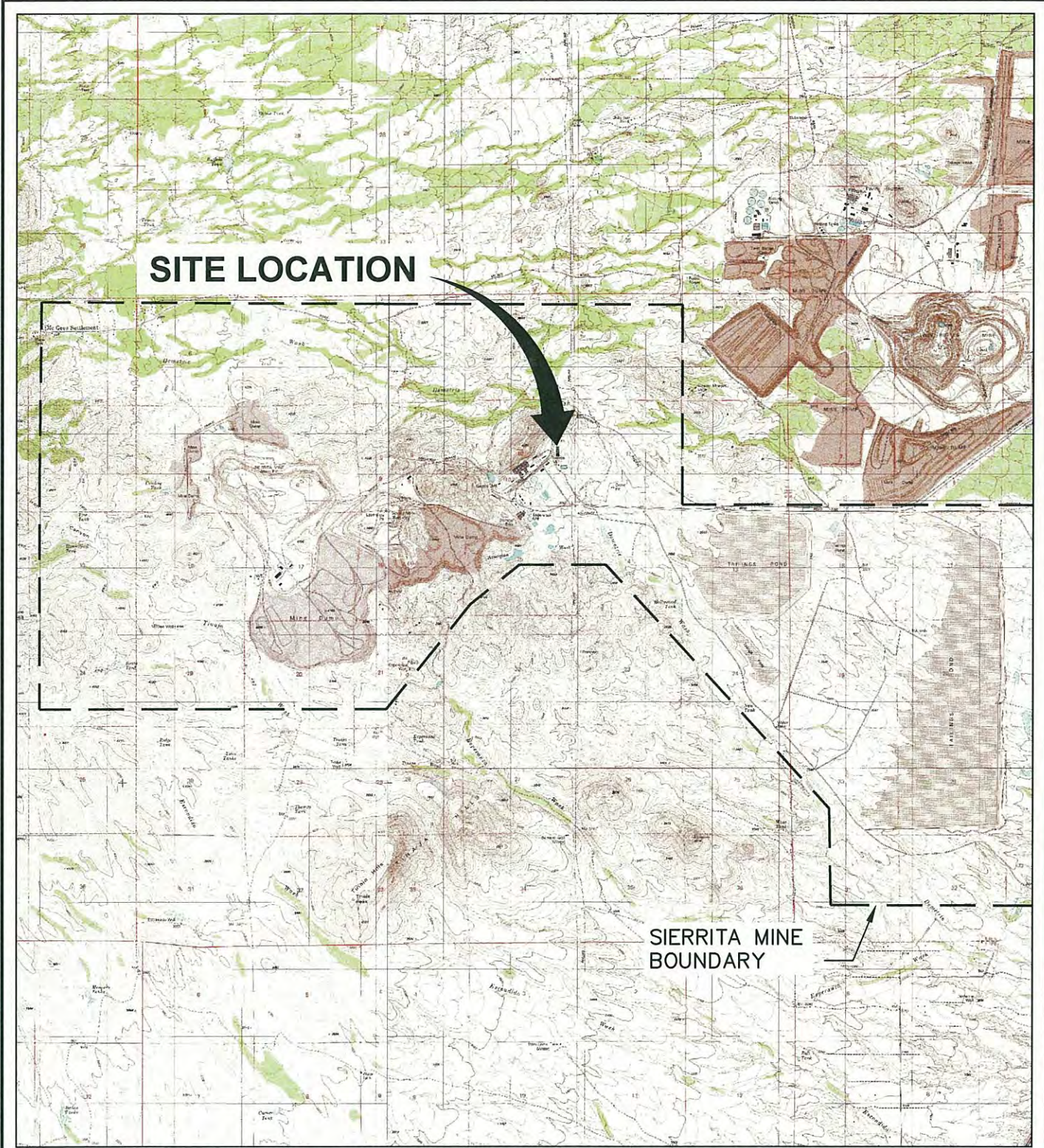
ft bgs - feet below ground surface

**Table 2
Distribution List and Project Directory**

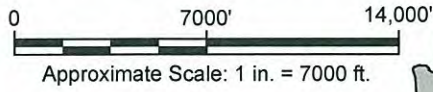
Name	Project Role	Street Address	City and State	Zip Code	Phone and Fax Numbers
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Katy Brantingham	ARCADIS Project Manager	4646 E. Van Buren St. Ste. 300	Phoenix, AZ	85008	602-659-3252 602-438-0102 (fax)

Figures

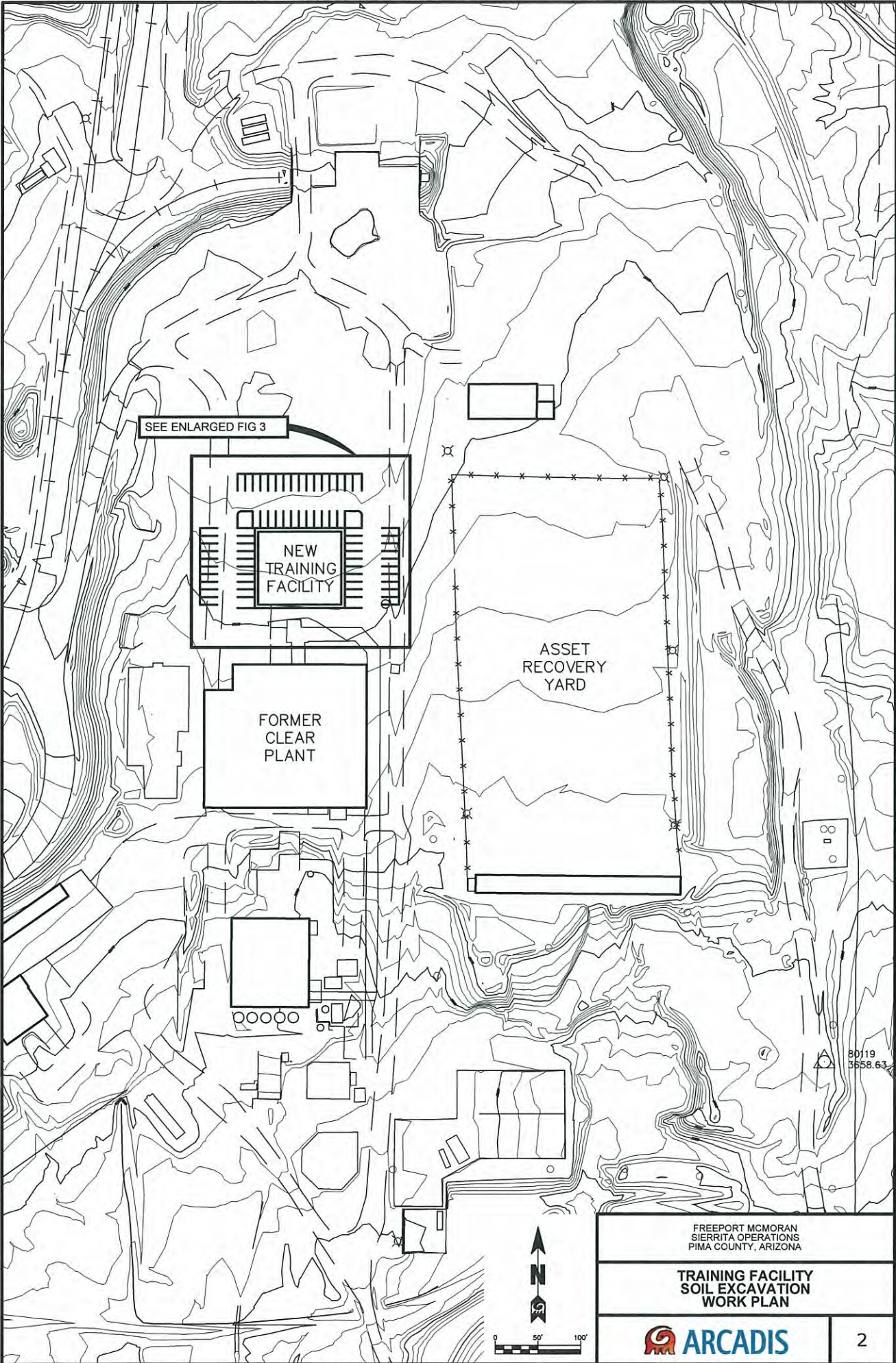
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REFERENCE: BASE MAP USGS 7.5 MIN. TOPO. QUAD., ESPERANZA MILL, ARIZ, 1981, BATAMOTE HILLS, ARIZ. 1981, TWIN BUTTES, ARIZ., AND SAMANIEGO PEAK, ARIZ. 1981



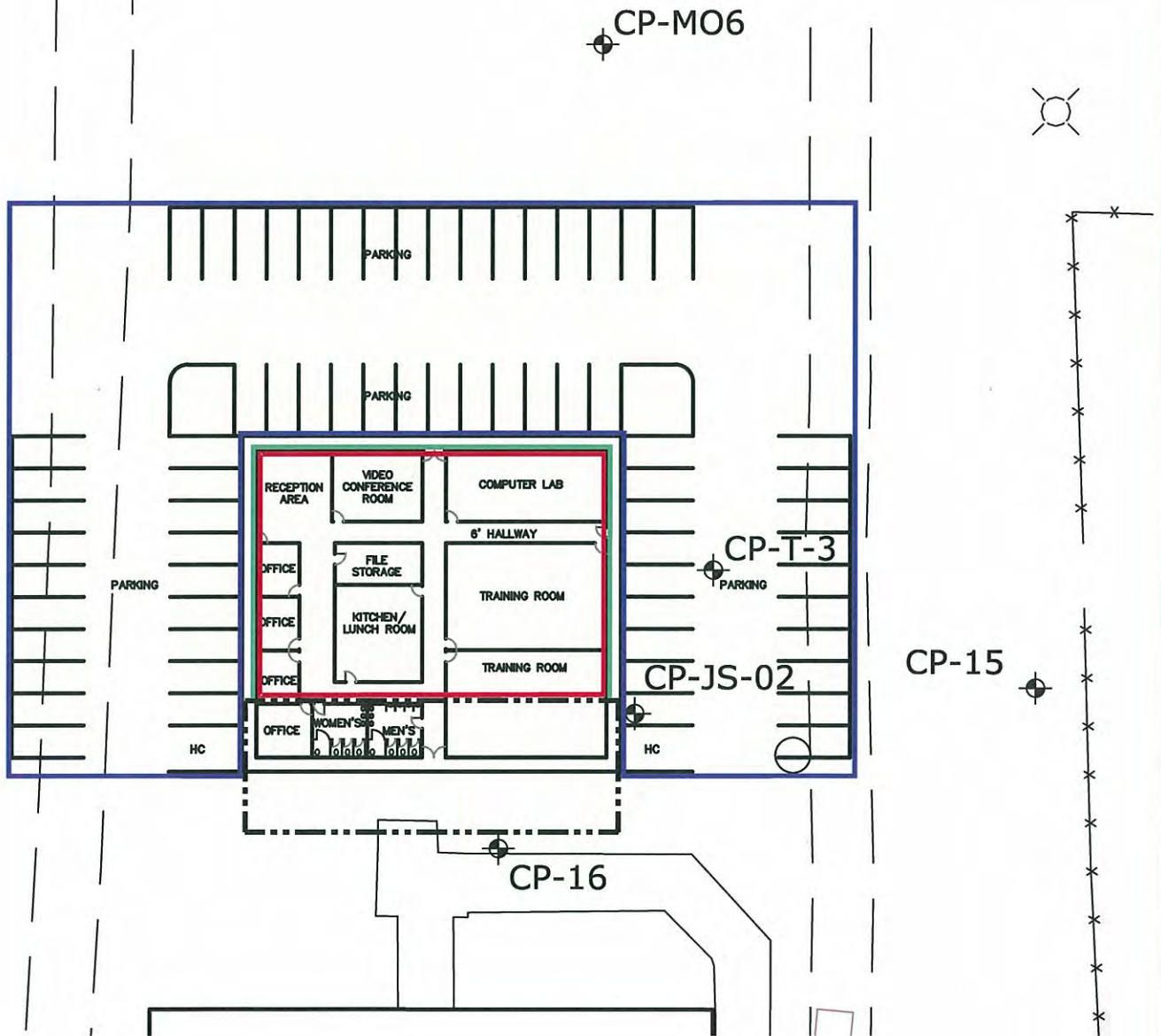
<p>FREEPORT-MCMORAN SIERRITA GREEN VALLEY, AZ TRAINING FACILITY SOIL EXCAVATION WORK PLAN</p>	
<p>SITE LOCATION MAP</p>	
	<p>FIGURE 1</p>




FREEPORT MCMORAN
SIERRITA OPERATIONS
PIMA COUNTY, ARIZONA

**TRAINING FACILITY
SOIL EXCAVATION
WORK PLAN**





LEGEND

 SOIL AND SEDIMENT
 CHARACTERIZATION
 REPORT SOIL SAMPLE

 PARKING LOT AREA

 SOUTHERN EXCAVATION AREA

 FOOTER EXCAVATION AREA

 BUILDING FOOTPRINT AREA



FREERPORT MCMORAN
 SIERRITA OPERATIONS
 PIMA COUNTY, ARIZONA

**TRAINING FACILITY
 SOIL EXCAVATION
 WORK PLAN**

