



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, FLOOR 10, TUCSON, AZ 85701-1317
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C.H. HUCKELBERRY
County Administrator

February 26, 2013

Jim Upchurch, Forest Supervisor
Coronado National Forest
300 W. Congress Street
Tucson, Arizona 85701

Re: Pit Depth, Revised Barrel Alternative – Proposed Rosemont Mine

Dear Mr. Upchurch:

Thank you for your February 11, 2013 letter.

Through staff research, you established that all portions of the Forest Service's Draft Environmental Impact Statement (DEIS) relied on a pit elevation of 3,050 feet above mean sea level, except for the visual analysis.

Your letter did not address the questions posed in my January 31, 2013 letter regarding the new pit configuration represented by Rosemont Copper to the Forest Service in July 2012. This figure (attached) was provided to tribal representatives as the latest version of the Barrel Alternative. We noted that the pit margins and pit depth are different than those analyzed in the DEIS. If available to the Forest Service, we would like a copy of the digital elevation model of this new configuration.

Because the new pit, at 2,900 feet, would be 150 feet deeper than the DEIS pit elevation of 3,050 feet, will the Forest Service require Rosemont to re-analyze the conclusions presented in the DEIS regarding the various effects, especially the pit lake, groundwater model and geochemical effects?

Since the new pit margins are different, in some cases extending higher on the crest of the Santa Rita Mountains (see our letters of October 25, 2012 and January 21, 2013), will the visual analysis be revised for a final EIS?

Mr. Jim Upchurch
Re: **Pit Depth, Revised Barrel Alternative – Proposed Rosemont Mine**
February 26, 2013
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "C. Huckelberry". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

C.H. Huckelberry
County Administrator

CHH/dph

Enclosures

c: Nicole Fyffe, Executive Assistant to the County Administrator
Julia Fonseca, Environmental Planning Manager, Conservation and Sustainability



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C.H. HUCKELBERRY
County Administrator

January 31, 2013

Jim Upchurch, Forest Service Supervisor
Coronado National Forest
300 W. Congress Street
Tucson, Arizona 85701

Re: Pit Depth, Revised Barrel Alternative – Proposed Rosemont Mine

Dear Mr. Upchurch:

On November 30, 2012, your staff provided Ms. Julia Fonseca with requested Digital Elevation Models (DEM) of the alternatives as described in the Draft Environmental Impact Statement (DEIS). Since that time, we have identified certain changes to the dimensions and location of the pit that was the basis for the DEIS. The purpose of this letter is to identify another consideration, the depth of the pit.

Using your DEM, Pima County Information Technology has identified that the bottom elevation of the pit referenced as the Barrel Alternative in the DEIS is 3,175 feet msl.

In Rosemont's NI 43-101 Technical Report dated August 2012, Figure 15-13 (see below) clearly identifies the bottom of the pit at elevation 2,900 feet, which is 275 feet below the depth of the DEIS Barrel alternative. Rosemont's NI 43-101 Figure 15-13, representing the new pit depth, was prepared on July 24, 2012 and appears to mirror the CDM Smith Figure 1, dated July 9, 2012 that was distributed to tribal representatives as a depiction of the new Barrel Alternative (attached).

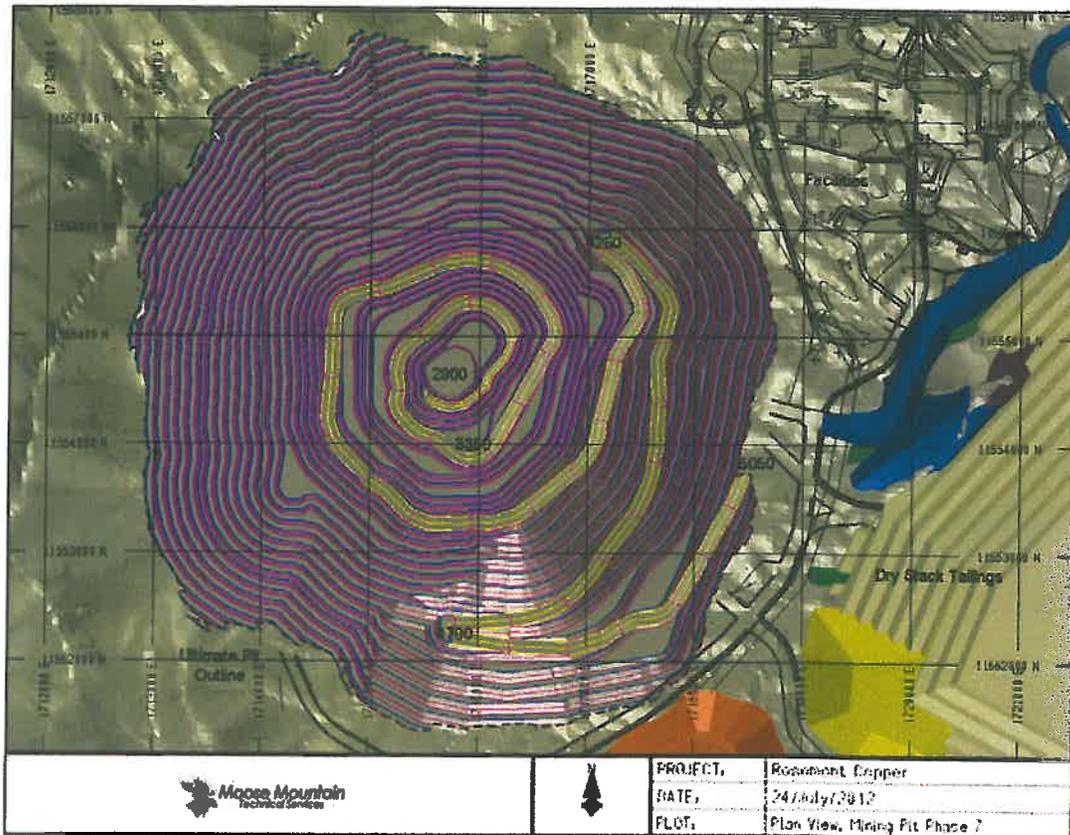


Figure 15-13: Plan View of Mining Pit Phase 7 (Ultimate Pit)

The significance of the change in depth is that the bottom of the pit will intersect additional portions of the Horquilla Limestone Formation. Has this deeper Horquilla, which is identified as being enriched in copper sulfides over other portions of the Horquilla in the NI43-101 Report, been analyzed for pyrite content? Does it have a similar or different chemistry than formed the basis for the conclusions in the DEIS? Earlier geochemical testing indicates that other portions of the Horquilla release significant sulfate content. The deeper pit will also penetrate deeper into the hydrogeologic faulting and fracture-flow system, with unknown consequences. It also means the pit lake itself would be of greater depth and volume, which could have additional effects on hydrological resources, including water quality.

Because dewatering of the open pit will not be terminated until mining and mineral processing activities cease, the deeper pit proposed in the new Barrel Alternative mean

Mr. Jim Upchurch
Re: Pit Depth, Revised Barrel Alternative – Proposed Rosemont Mine
January 31, 2013
Page 3

dewatered than was previously analyzed in the DEIS and for possibly a longer time period than was previously disclosed.

I encourage the Forest Service to analyze and disclose the consequences of changing the pit geometry, including deepening the pit almost 300 additional feet. A shallower pit would appear to be financially feasible based on the economic disclosures in the NI43-101 Technical Report and might also reduce some of the direct and indirect impacts of the mine.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/mjk

Attachment

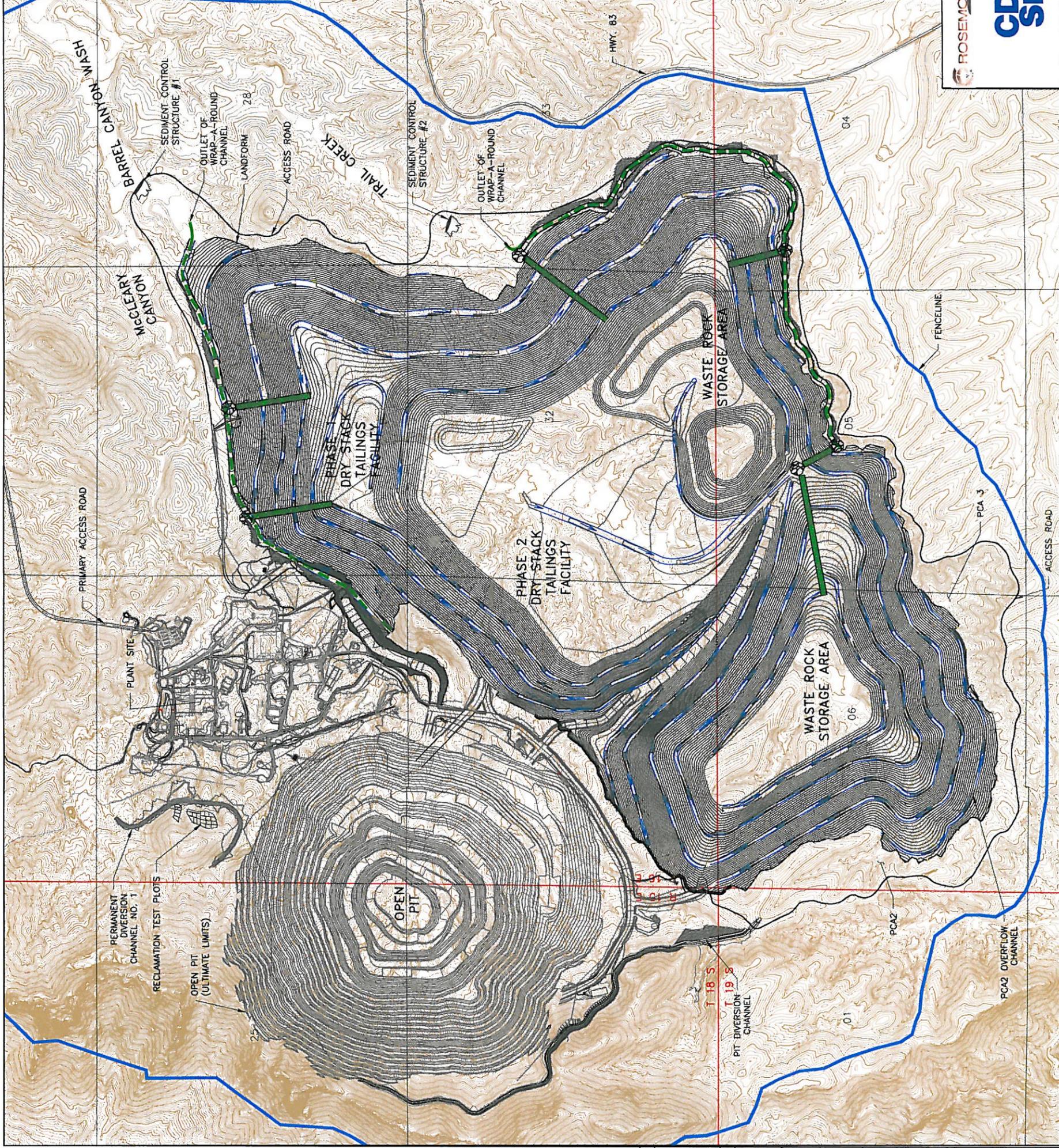
References

CDMSmith, July 9, 2012. Preliminary Reclamation and Closure Plan for the Barrel Alternative. Barrel Alternative Landform-Post Mining Facilities Layout, Figure 1.

M3, August 28, 2012. Rosemont Copper Project, NI43-101 Technical Report, Updated Feasibility Study, Pima County, Arizona, USA. Prepared for Augusta Resources.

Tetrattech, 2010. Technical Memorandum, David Krizek to Kathy Arnold. August 24, 2010. Rosemont Geochemical Pit Lake Predictive Model Summary.

U.S. Forest Service, 2011. Draft Environmental Impact Statement for the Rosemont Copper Project, A Proposed Mining Operation, Coronado National Forest, Pima County, Arizona.



LEGEND

- EXISTING CONTOURS
- PROPOSED CONTOURS
- DRAINAGE CHANNEL
- STILLING BASIN
- DROP STRUCTURE
- WRAP-A-ROUND CHANNEL ROUTING
- DRAINAGE BENCH
- FENCELINE



NOTE:
OPERATIONAL PLANT SITE SHOWN
WITH RECLAMATION LANDFORM.

ROSEMONT COPPER

**CDM
Smith**

PRELIMINARY RECLAMATION AND
CLOSURE PLAN
FOR THE BARREL ALTERNATIVE

BARREL ALTERNATIVE LANDFORM -
POST MINING FACILITIES LAYOUT

LOCATION: PIMA COUNTY, ARIZONA
DATE: 07.09.12
PROJECT NO: 91146
FILE NAME: FIGURE 1.DWG
FIGURE NO: 1