



Tyrone Operations
P.O. Box 571
Tyrone, NM 88065

July 21, 2015

Certified Mail #70150640000476262110
Return Receipt Requested

Mr. David Otori
Mining and Minerals Division
Mining Act Reclamation Program
1220 South St. Francis Drive
Santa Fe, NM 87505

Dear Mr. Otori:

**Re: Response to Little Rock Mine Expansion and Updated
Closeout Plan Comments, Revision 14-1, Permit No. GR007RE**

Freeport-McMoRan Tyrone Inc. (Tyrone) submitted a permit revision application to Permit Number GR007RE to address changes in the Closure Closeout Plan (2014 CCP) for the Little Rock Mine on July 10, 2014. The 2014 CCP is a conceptual plan based on the estimated end of year 2017 open pit configuration.

In a letter dated September 26, 2014, the Mining and Mineral Division (MMD) deemed the application to be administratively complete pursuant to 19.10.5.506.D NMAC and assigned the application revision number 14-1 to Permit No. GR007RE. On November 20, 2014, MMD and other state and federal agencies conducted an inspection of the proposed mine expansion areas at the Little Rock Mine. In a letter dated February 10, 2015, MMD provided comments on the Little Rock permit revision and Tyrone responded with a letter dated April 17, 2015. On June 29, 2015, Tyrone received some additional comments from MMD. Only the MMD comments where a Tyrone response was solicited is shown below and the numbering system remained consistent with the MMD comment letter.

1. Paragraph 2, page 1 -The Tyrone Response states that," Tyrone was encouraged by the Department of Energy, Minerals and Natural Resources (MMD) (in the late 1990s) to forego a waiver request for the site -stating that Tyrone could likely gain approval of a closeout plan without a waiver under these environmental conditions."

Please provide a reference for the above quoted MMD statement.

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The statement MMD requested a reference for was provided by Mr. Thomas L. Shelley who was employed as the Environmental Manager at Tyrone when the Closeout Plan for the Little Rock Mine was approved. The statement is a summary from one or more meetings in 1998 and early 1999 on the topic of a waiver being contemplated for the Little Rock mine. Mr. Doug Bland (then serving as director of MMD) and Mr. Holland Shepherd (also of MMD) met with Tyrone to discuss the Closeout Plan for Little Rock. The statement provided reflects Tyrone's understanding of the advice and guidance provided in the meeting(s) by MMD to Tyrone as the 1999 version of the Little Rock Closeout Plan was being developed.

3. To date, Tyrone has not demonstrated that the reclaimed copper leach stockpile or the results of the test plot studies successfully meet the revegetation standards of the Little Rock Mine closeout plan. MMD met with Tyrone on June 11, 2015 and has scheduled to meet with Tyrone on July 22, 2015 to further discuss amending the Little Rock Mine cover materials that Tyrone is testing at the USNR and/or the 7A leach cap cover material test plots.

The reclaimed Copper Leach Stockpile and precipitation plant (p-plant), at Little Rock Mine, were seeded in the summer of 2010. The revegetation is progressing well based on the 2013 qualitative assessment of the cover, density and diversity. Tyrone looks forward to meeting with the agency on July 22, 2015, to discuss the technical merits of developing a self-sustaining ecosystem using the available stockpiled cover material at the mine.

6. Tyrone's response indicates that an erosion gully observed on the West Canyon stockpile slope was caused by, "water accumulating on the top surface and flowing over the edge." MMD requires that the cause of this erosion be mitigated through a corrective action plan. Please submit a corrective action plan to address the erosion at the West Canyon stockpile within 30 days of receipt of this letter. MMD will review this corrective action under the currently approved closeout plan (maintenance) for the Little Rock Mine, and separately from the review of the updated closeout plan and expansion of the Little Rock Mine (Revision 14-1).

Tyrone will submit a maintenance plan for the West Canyon stockpile erosion feature.

10. Tyrone states that, "Tyrone has only indicated (since the time the agency requested that Tyrone not pursue a waiver at this site) that haul roads (portions not used for post-closure access) and in-pit stockpiles would be reclaimed to meet the applicable revegetation success standards." Please provide a reference for the statement that MMD, "requested that Tyrone not pursue a waiver at this site." (see MMD General Comment 1 above).

Please see Tyrone's responses to comment 1, above.

13. MMD appreciates Tyrone's effort to modify the design of the reclaimed open pit to improve wildlife access. MMD would like to discuss with Tyrone how wildlife access to the reclaimed In-pit Stockpile area depicted on Updated Sheet 5: Little Rock Mine CCP Post Reclamation, may be improved.

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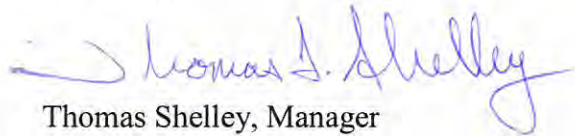
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On July 8, 2015, Tyrone and MMD held a conference call to discuss potential wildlife access to the reclaimed In-Pit Stockpile area shown on Updated Sheet 5. It was determined that a ramp, from the Western Haul Road to the Operational In-Pit Stockpile, would be present at End of Year 2017 that was not previously shown on the drawing. This ramp would provide additional access to the stockpile. Sheet 5 has been updated to show the conceptual location of the ramp and an updated copy of Sheet 5 is attached.

The total area of revegetation was evaluated with the addition of the ramp and change to the pit lake level. The total acres requiring revegetation, including this ramp (222 acres), is less than the acreage accounted for in the Little Rock CCP Appendix B (236 acres). Therefore, no change to the FA cost estimate is proposed.

Tyrone appreciates your timely review of this response letter. Should you have any questions or comments, please contact Lynn Lande at (575) 912-5235.

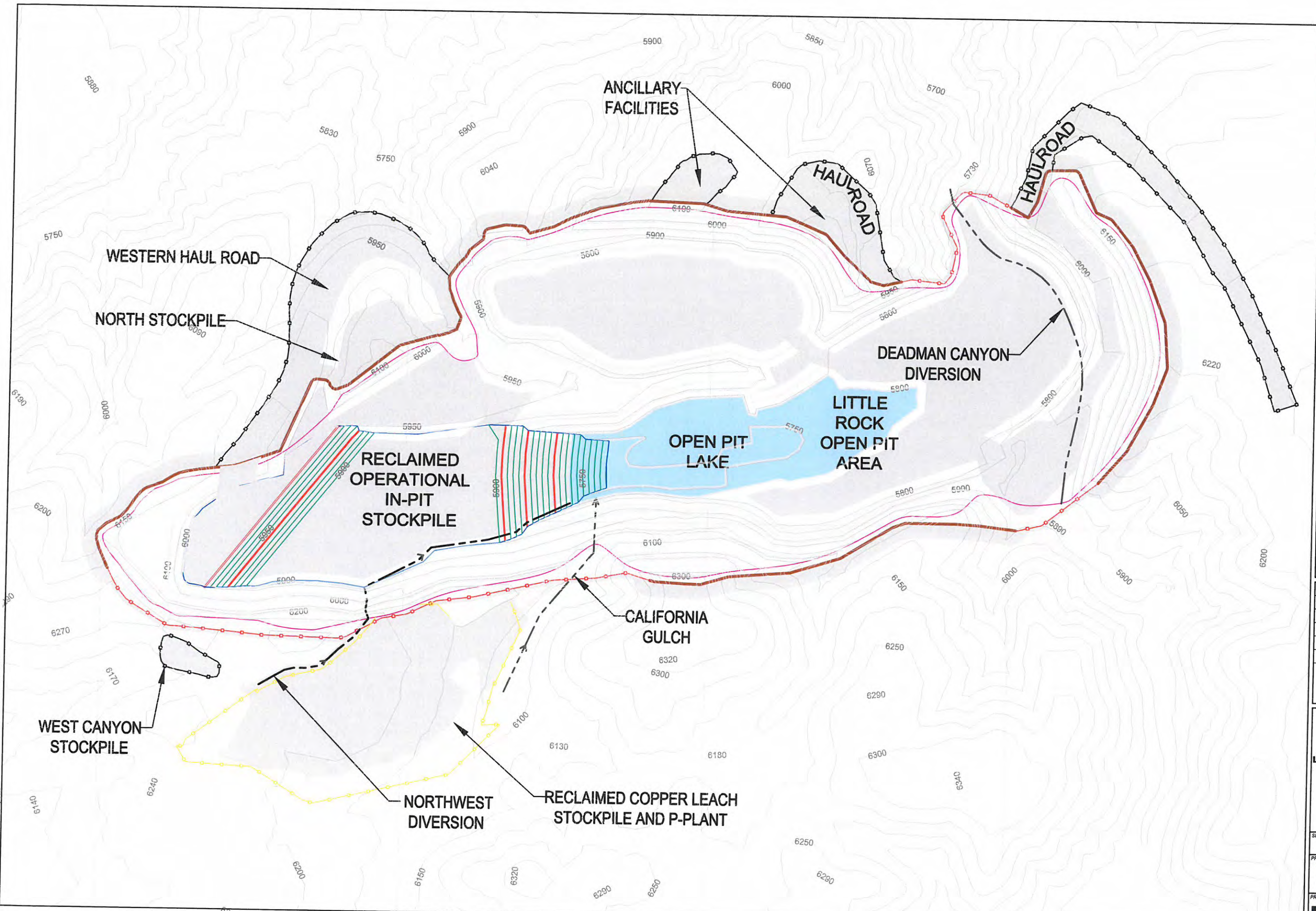
Sincerely,



Thomas Shelley, Manager
Reclamation Services

TLS:ml
Attachment
20150721-100

c. George Llewellyn
Keith Elhert
Joseph Navarro (BLM)



LEGEND / NOTES

- EOY 2017 CONTOURS (10 FT. INTERVAL)
- RECLAIMED CONTOURS
- PROJECTED EXTENT OPEN PIT EOY 2017
- BENCHES
- CHAINLINK FENCE
- LIVESTOCK FENCE
- EXISTING LIVESTOCK FENCE
- BERMS
- OPERATIONAL IN-PIT STOCKPILE
- REVEGETATED AREA
- OPEN PIT LAKE

NOTE:
1. TOPO SOURCE: FREPORT MCMORAN TYRONE INC. EOY 2017 MINE PLAN

0 300
SCALE IN FEET
COORDINATE SYSTEM
TYRONE LOCAL MINE

REVISIONS

#	DESCRIPTION	DATE	BY	APPROVED
1	ISSUED FOR AGENCY REVIEW	09/14	DO	AT
2	SHEETS REVISED	4/13/15	MM	AT
3	REVISED	7/15/15	MM	AT

DATE	4/13/2015
PROJECT	200540
TASK NUMBER	001-03
DRAWN BY	MM
PROJECT ENGINEER	AT
CHECKED BY	AT

LITTLE ROCK MINE CCP
FIGURE 5

SHEET NUMBER: 5 REVISION NUMBER: 1

PREPARED BY:
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PREPARED FOR:
FREPORT-McMORAN