

Horencecopper.com

May 24, 2012

Ms. Nancy Rumrill U.S. Environmental Protection Agency Region 9, Ground Water Office, WTR-9 75 Hawthorne Street San Francisco, California 94105-3901

Re: Application for Modification and Transfer of Underground Injection Control Permit No. AZ396000001 from Florence Copper, Inc. to Curis Resources (Arizona) Inc.

Dear Ms. Rumrill:

Curis Resources (Arizona) Inc. (Curis Arizona) submitted an application for the modification and transfer of UIC Permit No. AZ396000001 (UIC Permit) from Florence Copper Inc. to Curis Arizona in March 2011. The application describes Curis Arizona's plans for two phases of development. Phase 1 would involve the installation of a pilot-scale production test facility (PTF), which would include processing facilities and a small well field located within the aquifer exemption area that was approved at approximately the same time that the UIC Permit was issued in 1997. As described in Attachment K of the application, the Phase 1 well field is proposed to include four injection wells, nine recovery wells, seven observation wells and four multi-level sampling wells. Phase 2 Commercial-Scale Facility (CSF) will benefit on the information gained from the Phase 1 PTF and would include the construction of commercial-scale processing facilities and well fields that would also be located within the previously approved aquifer exemption area. The Phase 2 well fields will be designed to produce approximately 11,000 gallons per minute (gpm) of pregnant leachate solution (PLS), which compares to the Phase 1 design capacity of 300 gpm PLS.

To facilitate the process of reviewing the application, Curis Arizona requests that your office focus initially on the review needed for the approval of the Phase 1 PTF. This would enable the Phase 1 PTF to be installed and to commence operation while the review and approval of the Phase 2 CSF is being completed. Curis Arizona will provide financial assurance for each phase of development as outlined in Attachment R of the application and as described in applications submitted to the Arizona Department of Environmental Quality.

Please do not hesitate to contact me at (520) 374-3984 or (520) 520-233-1930 if you have questions regarding this request.

Sincerely,

Curis Resources (Arizona) Inc.

Daniel Johnson

Vice President - General Manager

cc: David Albright, U.S. Environmental Protection Agency

Richard Mendolia, Arizona Department of Environmental Quality

Michael McPhie, Curis Resources (Arizona), Inc.