

FILE: 4286-TM26-03

August 14, 2026

Arizona Department of Environmental Quality
APP Unit, Groundwater Protection Value Stream, Water Quality Division
1110 West Washington Street
Phoenix, AZ 85007

Attention: Mr. Travis Ralston, Hydrogeologist

Re: Point-of-Compliance Ambient Groundwater Monitoring Report Update and Revised Recommendation, Copper World Project, Helvetia, Arizona

INTRODUCTION

Piteau Associates (Piteau), on behalf of Copper World LLC (CW), prepared a Point-of-Compliance (POC) groundwater monitoring report for the Copper World Project (the Project) dated July 12, 2026 (Piteau, 2026).

The report provided statistical analysis on the ambient groundwater monitoring datasets for constituents with an established numeric Aquifer Water Quality Standards (AWQS) in all POC wells. Ambient groundwater conditions were monitored and samples were analyzed in accordance with the Project POC groundwater monitoring plan (Piteau, 2025b). The resulting dataset was used to calculate Alert Levels (AL) and Aquifer Quality Limits (AQL), where appropriate. Additional review of POC well sampling documentation has shown inconsistencies in meeting low flow purge criteria.

ALs and AQLs for well/constituent combinations that showed statistically increasing trends were not recommended to be established at that time. Four additional quarterly monitoring events through second quarter 2027 were recommended prior to establishing ALs and AQLs for those well/constituent combinations. The eight increasing trends include:

- POC-02 - Gross Alpha Activity
- POC-02 - Total Radium
- POC-04 - Fluoride
- POC-04 - Gross Alpha Activity
- POC-05 - Arsenic
- POC-05 - Uranium
- POC-06 - Gross Alpha Activity
- POC-06 - Uranium.



ALs and AQLs for all other well/constituent combinations with an established numeric AWQS were recommended to be established in accordance with AAC § R18-11. Sixteen well/constituent combinations had a recommended AL elevated above 80% of the AWQS (elevated background conditions) including:

- POC-01 - Gross Alpha Activity
- POC-01 - Nitrate and Nitrite, Sum
- POC-01 - Nitrate (as N)
- POC-01 - Uranium
- POC-02 - Arsenic
- POC-02 - Uranium
- POC-03 - Arsenic
- POC-03 - Gross Alpha Activity
- POC-04 - Thallium
- POC-04 - Uranium
- POC-05 - Beryllium
- POC-05 - Fluoride
- POC-05 - Gross Alpha Activity
- POC-06 - Antimony
- POC-06 - Fluoride
- POC-07 - Arsenic.

REVISED RECOMMENDATIONS

Additional review of POC well sampling documentation has shown inconsistencies in meeting low flow purge criteria. USEPA (2017) guidance presents parameter range limits during purging. The guidance also allows for sample collection in situations without stabilization of purge monitoring parameters; in these cases, field conditions and troubleshooting must be recorded in order to support field decisions to deviate from normal procedures.

Despite the identified inconsistencies, no significant impact on the resulting groundwater monitoring data set has been identified; the dataset is representative of Project groundwater conditions at the POC locations; therefore, there is also no impact on the previously recommended AL and AQL values.

However, in order to ensure the defensibility of the Project POC program, Piteau and CW are recommending to include the sixteen well/constituent combinations with elevated background conditions for additional ambient monitoring prior to establishing ALs and AQLs.

The sixteen well/constituent combinations are recommended for additional monitoring on a monthly basis, until the Project POC field data sheets and groundwater monitoring database is both representative of Project groundwater conditions at the POC locations, and defensible in accordance with USEPA well purging guidance. The additional monitoring for these sixteen



well/constituent combinations is anticipated to continue through December 2026 at a minimum, and may extend longer if outliers are identified in the additional dataset.

Piteau will prepare, and CW will submit, a technical report summarizing the additional ambient monitoring data and recommending ALs and AQLs, complete with copies of groundwater sampling documentation, laboratory analytical reports, and statistical analyses.

REFERENCES

Arizona Administrative Code (AAC) § R18-11-406. Adopted effective January 4, 1990 (Supp. 90-1). Amended effective August 14, 1992 (Supp. 92-3). Amended effective May 26, 1994 (Supp. 94-2).

Piteau Associates, 2025. Copper World Project, Point of Compliance Monitoring Program Work Plan. Prepared for Copper World, Inc. April.

Piteau Associates, 2026. Point-of-Compliance Ambient Groundwater Monitoring Report and Use Protection Limit Analysis, Copper World Project, Helvetia, Arizona. June 15.

USEPA, 2017. Low Stress (Low Flow) Purging and Sampling Procedures for the collection of Groundwater Samples from Monitoring Wells. Quality Assurance Unit, USEPA – Region I. September 19.

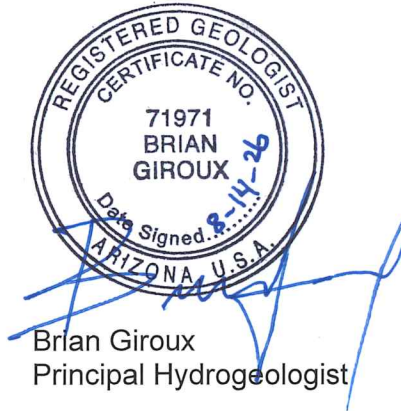


CLOSING

We trust that the data and analysis presented herein meets the requirements of ADEQ at this time. Please do not hesitate to contact the undersigned with any comments or questions.

Sincerely,

PITEAU ASSOCIATES USA LTD.



Brian Giroux
Principal Hydrogeologist

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Electronic copy of final document; sealed original document is with Brian Giroux, Registered Geologist #71971.