TRONOX

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June 19, 2006

Mr. Todd Croft Supervisor Nevada Division of Environmental Protection 1771 East Flamingo – Suite 121A Las Vegas, NV 89119

Subject: Athens Road ART-9 Pump Test

Dear Mr. Croft,

As approved by your letter of April 24, 2006, Tronox has completed installation and successful testing of the ART-9 well in the Athens Road well field. We now request your approval to connect the well to Lift Station #3 and begin groundwater pumping as a replacement for the existing ART-6A well.

According to Ed Krish of ENSR, the recent pump test of ART-9 indicates that the well will steadily produce 25-35 gallons of water per minute. The maximum flow during the test was about 70 gpm, but could not be sustained. ART-9 is screened slightly deeper than either the ART 6 or ART 7 wells and will capture small quantities of perchlorate which currently flow to Las Vegas Wash. A complete report on the pump test will be included in the next quarterly perchlorate report.

Tronox proposes to tie the new ART-9 well to the existing ART-6A flow line and power connections. ART-6A is less than 50 feet from the new well and does not produce as much water as the flow which was tested from ART-9. Tronox would operate ART-9 continuously except for brief maintenance outages where the ART-6 "buddy well" would be utilized. Since the distance between the wells is short and the quantity of water from the sands below the ART-6 screen level is small, we do not see significant benefit to installing a new ART-9A well as a spare for ART-9.

If you have questions or comments on this request, please call me (702) 651-2234 or Keith Bailey at (405) 775-6526.

Sincerely.

Susan Crowley

Staff Environmental Specialist, CEM 1428

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