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November 28, 2018

Arizona Corporation Commission

DOCKETED

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BY HAND DELIVERY

Commissioner Andy Tobin
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

Re: Responses to Commissioner Tobin's November 27, 2018 Letter re Merger Agreement
Docket Nos. WS-01025A-17-0361, E-01025A-17-0362, WS-01025A-17-0363

Dear Commissioner Tobin:

Ajo Improvement Company has reviewed both the Freeport-McMoran/Phelps Dodge merger agreement and the related proxy statement and neither document addresses infrastructure obligations and system improvements at Ajo Improvement Company. Both documents are available online:

Merger agreement: https://content.edgar-online.com/ExternalLink/EDGAR/0000950123-06-014346.html?hash=d3fd0d84b339c5b0db385aa5d0129fc25f2cdd54034d78cb7f0942db3064965a&dest=Y27419AEXV2W1_HTM#Y27419AEXV2W1_HTM

Proxy statement:

https://www.sec.gov/Archives/edgar/data/831259/000095010306002781/dp04206_s4.htm

I apologize for the delay in responding - the intervening Thanksgiving holiday week after the conclusion of the hearing delayed our response.

Respectfully,

Michael W. Patten
Counsel for Ajo Improvement Company

Commissioner Andy Tobin
November 28, 2018

Original and 13 copies filed with Docket Control

cc: Commissioners
Judge Martin
Parties of Record