

Certificate of Grandfathered Groundwater Right

STATE OF ARIZONA DEPARTMENT OF WATER RESOURCES

*This is to certify that pursuant to the provisions of
Title 45, Chapter 2, Arizona Revised Statutes*

TUCSON COUNTRY CLUB
2950 N CAMINO PRINCIPAL
TUCSON, AZ 85715

is granted an

TYPE 2 NON-IRRIGATION GRANDFATHERED RIGHT

in the

TUCSON ACTIVE MANAGEMENT AREA

*for 908.84 acre-feet of groundwater annually from January 1 through December 31. GroundWater withdrawn pursuant to this right may be used for **Non-Irrigation** purpose(s). The well registration number(s) and the location of the well(s) where the groundwater will be withdrawn pursuant to this right are as follows:*

See Exhibit A attached hereto and made a part hereof by reference

The use of groundwater pursuant to this right shall be in accordance with the laws of the State of Arizona and restrictions placed on use by the Director of the Department of Water Resources pursuant to Title 45, Chapter 2, Arizona Revised Statutes.

CERTIFICATE NO. 58-106007.0002

is granted this 10th day of October, 1989

ARIZONA DEPARTMENT OF WATER RESOURCES



Clinton Chandler, Assistant Director
Water Planning and Permitting Division

The Department of Water Resources must be notified if the above named person(s) makes an address change or conveys ownership of the right to another person(s).

Exhibit A

TYPE 2 NON-IRRIGATION GRANDFATHERED RIGHT

58-106007.0002

Groundwater withdrawn pursuant to this right may be used for **Non-Irrigation** purposes(s).

The well registration number(s) and the location of the well(s) where the groundwater will be withdrawn pursuant to this right are as follows:

55-220894	SE $\frac{1}{4}$ of SW $\frac{1}{4}$ of SE $\frac{1}{4}$ Sec 25 T13S R14E	GSRB&M
55-221427	NW $\frac{1}{4}$ of NE $\frac{1}{4}$ of NW $\frac{1}{4}$ Sec 31 T13S R15E	GSRB&M
55-221919	SE $\frac{1}{4}$ of NW $\frac{1}{4}$ of NW $\frac{1}{4}$ Sec 31 T13S R15E	GSRB&M
55-222858	SE $\frac{1}{4}$ of SE $\frac{1}{4}$ of NW $\frac{1}{4}$ Sec 31 T13S R15E	GSRB&M
55-225125	SE $\frac{1}{4}$ of SE $\frac{1}{4}$ of NW $\frac{1}{4}$ Sec 17 T17S R14E	GSRB&M
55-241987	SE $\frac{1}{4}$ of SE $\frac{1}{4}$ of NW $\frac{1}{4}$ Sec 17 T17S R14E	GSRB&M
55-241988	SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of NW $\frac{1}{4}$ Sec 17 T17S R14E	GSRB&M
55-241989	NE $\frac{1}{4}$ of SW $\frac{1}{4}$ of SE $\frac{1}{4}$ Sec 29 T17S R14E	GSRB&M
55-242051	SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of NW $\frac{1}{4}$ Sec 17 T17S R14E	GSRB&M
55-501152	NW $\frac{1}{4}$ of NW $\frac{1}{4}$ of NE $\frac{1}{4}$ Sec 31 T13S R15E	GSRB&M
55-524543	SE $\frac{1}{4}$ of NW $\frac{1}{4}$ of NE $\frac{1}{4}$ Sec 31 T13S R15E	GSRB&M
55-626131	SE $\frac{1}{4}$ of NW $\frac{1}{4}$ of NE $\frac{1}{4}$ Sec 31 T13S R15E	GSRB&M
55-626132	SE $\frac{1}{4}$ of NE $\frac{1}{4}$ of NE $\frac{1}{4}$ Sec 36 T13S R14E	GSRB&M
55-626134	SW $\frac{1}{4}$ of NW $\frac{1}{4}$ of NE $\frac{1}{4}$ Sec 31 T13S R15E	GSRB&M
55-626135	SE $\frac{1}{4}$ of SW $\frac{1}{4}$ of SE $\frac{1}{4}$ Sec 25 T13S R14E	GSRB&M
55-626136	NE $\frac{1}{4}$ of NE $\frac{1}{4}$ of SW $\frac{1}{4}$ Sec 31 T13S R15E	GSRB&M

KATIE M. HOBBS
Governor



THOMAS BUSCHATZKE
Director

ARIZONA DEPARTMENT OF WATER RESOURCES

1110 West Washington Street, Suite 310
Phoenix, Arizona 85007-2952
602-771-8500
azwater.gov

August 27, 2026

TUCSON COUNTRY CLUB
2950 N CAMINO PRINCIPAL
TUCSON, AZ 85715

Re: Type 2 Non-Irrigation Right No. 58-106007.0002

Dear Right Owner:

Enclosed is your Certificate of Type 2 Non-Irrigation Grandfathered Groundwater Right (Type 2 Right). **The Certificate specifies the annual amount of groundwater that may be withdrawn pursuant to your Type 2 Right and the location of the well(s) from which you are authorized to withdraw groundwater.**

Supporting information for your right is on file at the Department and is available upon request. **Remember, only the amount of groundwater allotted for the right may be withdrawn pursuant to the right.**

This is also an Official Notice of Conservation Requirements and Monitoring and Reporting Requirements that applies to your non-irrigation use. These requirements were established in the (First Management Plan) for the Tucson Active Management Area.

As a person using groundwater not supplied by a city, town or private water company for a non-irrigation use, you are classified as an **industrial user**. You are required to comply with the conservation requirements and monitoring and reporting requirements for all industrial users in Chapter 6 of the applicable management plan. Refer to those requirements at <https://www.azwater.gov/ama/ama-management-plans>.

Additional specific requirements have been established in the for the following industrial users: turf-related facilities, sand and gravel facilities, power plants, dairy operations and cattle feedlot operations, large-scale cooling facilities and new large landscape users.

Should your intended industrial use fall under any of the above referenced additional specific requirements, you are also required to comply with them. If an additional attachment is enclosed, it is because the Department reviewed your application and determined that your intended industrial use does fall under one of the additional specific user requirements.

You must begin complying with the conservation requirements set forth in the applicable attachment(s) upon commencement of groundwater use at your facility, and continue complying with the requirements until the effective date of any substitute requirements in the Seventh MP.

Please note that the conservation requirements in this notice apply to water use at your industrial facility, rather than to this Type 2 Right or any other withdrawal authorities associated with this facility.

You have the right to request a variance and, in some limited circumstances, an administrative review for relief from the conservation requirements. Please refer to the enclosed Variance and Administrative Review Insert for more information.

As provided in A.R.S. § 45-604 and § 45-632, any person withdrawing groundwater from a well pursuant to a Type 2 Right is required to use a water measuring device to record rates of withdrawal in order to provide or allow the computation of an annual volume of pumpage from the well(s). The total volume of pumpage shall be reported on an **Annual Water Withdrawal and Use Report** on a calendar year basis. Please refer to the enclosed Annual Report Insert for more information.

As the owner of a Type 2 Right, you are reminded that the Department must be notified if the right owner(s) changes his or her mailing address, conveys ownership of all the right to another person or changes the point(s) of withdrawal, leases all or a portion of the right to another person or changes the place or purpose of the use. If a Type 2 Right is conveyed, the full amount of the right is conveyed for a non-irrigation use. **A Type 2 Right may not be conveyed for an irrigation use.** A Type 2 Right that is issued for purposes of mineral extraction or processing, or for purposes of electrical generation may be conveyed only for the same use. Forms and information relative to these matters are available upon request or on our website at www.azwater.gov.

Every reasonable effort has been made to ensure that the information contained herein and on all accompanying documents is accurate. However, if you believe errors have been made, or if you have any questions, please contact the Active Management Area Section at (602) 771-8585.

Sincerely,

Thao Le

Water Resource Specialist,
Statewide Active Management Area Section,
Water Planning and Permitting Division

Arizona Department of Water Resources

Groundwater Right/Facility Report

RIGHT #: 58-106007.0002

STATUS DATE: 10/10/1989

AMA: TUCSON AMA

RIGHT/PERMIT/FACILITY TYPE: TYPE 2 NON-IRRIGATION GFR

LAND OWNERSHIP: PRIVATE OR COMPANY

FILE STATUS: ACTIVE - MODIFIED

2026 ALLOTMENT: 908.84

BMP Enrollee: N

RETIRED ACRES: 0.00

CREDITS: .00

WATER DUTY ACRES: 0.00

IRRIGATION ACRES 0.00

WATER DUTY: 0

Mgt Plan 0

IRRIGATION DISTRICT NAME:

MAWA: 0

EXTINGUISHMENT CREDITS:

NAME & ADDRESS

TUCSON COUNTRY CLUB
2950 N CAMINO PRINCIPAL

TYPE: OWNER

TUCSON AZ 85715

COPPER WORLD LLC
5285 E WILLIAMS CIRCLE, SUITE 2010

TYPE: LESSEE

TUCSON AZ 85711

PLACE OF USE

SE SW SE 25 T13.0S R14.0E

SE NE NE 36 T13.0S R14.0E

NW NW NE 31 T13.0S R15.0E

NE NE SW 31 T13.0S R15.0E

SE NW NE 31 T13.0S R15.0E

BOOK/MAP/PARCEL

*** NO DATA FOUND ***

WELL SERVING

Well#	55 - 626134	Location	SW NW NE 31 T13.0S R15.0E	Year	2026
Well#	55 - 222858	Location	SE SE NW 31 T13.0S R15.0E	Year	2026
Well#	55 - 220894	Location	SE SW SE 25 T13.0S R14.0E	Year	2026
Well#	55 - 626131	Location	SE NW NE 31 T13.0S R15.0E	Year	2026
Well#	55 - 501152	Location	NW NW NE 31 T13.0S R15.0E	Year	2026
Well#	55 - 221427	Location	NW NE NW 31 T13.0S R15.0E	Year	2026
Well#	55 - 626135	Location	SE SW SE 25 T13.0S R14.0E	Year	2026
Well#	55 - 524543	Location	SE NW NE 31 T13.0S R15.0E	Year	2026
Well#	55 - 241988	Location	SW SW NW 17 T17.0S R14.0E	Year	2026

Arizona Department of Water Resources

Groundwater Right/Facility Report

Well#	55 - 626136	Location	NE NE SW 31 T13.0S R15.0E	Year	2026
Well#	55 - 242051	Location	SW SE NW 17 T17.0S R14.0E	Year	2026
Well#	55 - 241989	Location	NE SW SE 29 T17.0S R14.0E	Year	2026
Well#	55 - 626132	Location	SE NE NE 36 T13.0S R14.0E	Year	2026
Well#	55 - 225125	Location	SE SE NW 17 T17.0S R14.0E	Year	2026
Well#	55 - 241987	Location	SE SE NW 17 T17.0S R14.0E	Year	2026
Well#	55 - 221919	Location	SE NW NW 31 T13.0S R15.0E	Year	2026

RIGHT TO FACILITY RELATIONSHIPS

Related PCC	Relationship	Active Relationship	Reporting Flag
25-625034.0000	RIGHT/PERMIT USED AT FACILITY	Y	Y
50-106007.0000	TYPE 2 LEASES	Y	Y

Arizona Department of Water Resources

Groundwater Right/Facility Report

RIGHT #: 58-106007.0002

STATUS DATE: 10/10/1989

AMA: TUCSON AMA

RIGHT/PERMIT/FACILITY TYPE: TYPE 2 NON-IRRIGATION GFR

LAND OWNERSHIP: PRIVATE OR COMPANY

FILE STATUS: ACTIVE - MODIFIED

2026 ALLOTMENT: 908.84

BMP Enrollee: N

RETIRED ACRES: 0.00

CREDITS: .00

WATER DUTY ACRES: 0.00

IRRIGATION ACRES 0.00

WATER DUTY: 0

Mgt Plan 0

IRRIGATION DISTRICT NAME:

MAWA: 0

EXTINGUISHMENT CREDITS:

NAME & ADDRESS

TUCSON COUNTRY CLUB
2950 N CAMINO PRINCIPAL

TYPE: OWNER

TUCSON AZ 85715

PLACE OF USE

SE SW SE 25 T13.0S R14.0E

SE NE NE 36 T13.0S R14.0E

NW NW NE 31 T13.0S R15.0E

NE NE SW 31 T13.0S R15.0E

SE NW NE 31 T13.0S R15.0E

BOOK/MAP/PARCEL

*** NO DATA FOUND ***

WELL SERVING

Well#	55 - 626134	Location	SW NW NE 31 T13.0S R15.0E	Year	2026
Well#	55 - 222858	Location	SE SE NW 31 T13.0S R15.0E	Year	2026
Well#	55 - 220894	Location	SE SW SE 25 T13.0S R14.0E	Year	2026
Well#	55 - 626131	Location	SE NW NE 31 T13.0S R15.0E	Year	2026
Well#	55 - 501152	Location	NW NW NE 31 T13.0S R15.0E	Year	2026
Well#	55 - 221427	Location	NW NE NW 31 T13.0S R15.0E	Year	2026
Well#	55 - 626135	Location	SE SW SE 25 T13.0S R14.0E	Year	2026
Well#	55 - 524543	Location	SE NW NE 31 T13.0S R15.0E	Year	2026
Well#	55 - 626136	Location	NE NE SW 31 T13.0S R15.0E	Year	2026
Well#	55 - 626132	Location	SE NE NE 36 T13.0S R14.0E	Year	2026
Well#	55 - 221919	Location	SE NW NW 31 T13.0S R15.0E	Year	2026

RIGHT TO FACILITY RELATIONSHIPS

Related PCC	Relationship	Active Relationship	Reporting Flag
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RIGHT #: 58-106007.0002

PAGE: 1

Report Date: 8/27/2026

Arizona Department of Water Resources

Groundwater Right/Facility Report

RIGHT TO FACILITY RELATIONSHIPS

Related PCC	Relationship	Active Relationship	Reporting Flag
25-625034.0000	RIGHT/PERMIT USED AT FACILITY	Y	Y

FENNEMORE.

Rhett A. Billingsley

Director

rbillingsley@fennemorelaw.com

2394 E. Camelback Rd., Suite 600

Phoenix, Arizona 85016-9077

PH (602) 916-5486 | FX (602) 916-5999

fennemorelaw.com

July 21, 2026

VIA E-MAIL AND HAND DELIVERY

Ciana Camacho
Conveyance Coordinator
Arizona Department of Water Resources
1110 W. Washington Steet, Suite 310
Phoenix, AZ 85007

RECEIVED

JUL 21 2026

**ARIZONA DEPARTMENT
OF WATER RESOURCES**

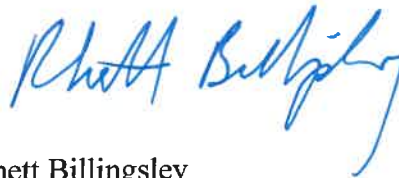
Re: Notice of Lease and Notice of Addition of Points of Withdrawal for Type 2 Right
No. 58-106007.0002 (Tucson Active Management Area)

Dear Ms. Camacho:

On behalf of our client, Copper World LLC ("Copper World"), we are submitting the enclosed Notice of Lease of Type 2 Right and Notice of Change in Points of Withdrawal for Type 2 Right No. 58-106007.0002 (the "Notices"). We have included the originals and copies of this letter and the Notices. Please date-stamp the originals and copies and received by the Department and return the date-stamped copies of the letter and Notices with our courier. Please contact Cecily Benson at our office for payment of the fees associated with Notices. You can contact Ms. Benson by email at cbenson@fennemorelaw.com and by phone at (602) 916-5015.

We would greatly appreciate it if the Department were able to process the enclosed Notices on expedited basis. Copper World needs to start groundwater withdrawal pursuant to the leased Type 2 Right as soon as possible to supply water for dust control purposes related to a construction project. Thank you for your understanding and prompt attention to the enclosed Notices.

Sincerely,



Rhett Billingsley

RECEIVED

JUL 21 2026

ARIZONA DEPARTMENT
OF WATER RESOURCES

NOTIFICATION OF CHANGE OF OWNERSHIP AND/OR CHANGE IN POINT OF WITHDRAWAL
FOR A TYPE 2 NON-IRRIGATION GRANDFATHERED RIGHT

PART I. GENERAL INFORMATION

1. Certificate of Grandfathered Groundwater Right number: 58 - 106007 . 0002
2. Amount of right indicated on certificate: 908.84 acre-feet annually.
3. Active Management Area: TUCSON
4. Describe the intended non-irrigation use(s). (Note: In accordance with A.R.S. § 45-474(A), the owner of a Type 2 Non-Irrigation Grandfathered Right that is issued for purposes of mineral extraction or processing, or for purposes of electrical energy generation, may not convey the right for any other purpose.)

Any non-irrigation uses allowed by law. No change in ownership. This notice is being
filed to add wells in connection with the lease of a portion of the Type 2 Right.

PART II. REQUEST FOR CHANGE IN POINT OF WITHDRAWAL

In accordance with A.R.S. § 45-471(C), the undersigned parties hereby request the Arizona Department of Water Resources to issue a revised certificate of Type 2 Non-irrigation Grandfathered Right to reflect different points of withdrawal or to remove all wells from this certificate:

1. Wells to be added to certificate (list by ADWR registration number; non-exempt wells only). If no new wells are to be added,

write "None":	Twp	Rng	Sec	Quarters	Owner Name	Proposed Type 2 Withdrawals
				160 40 10		
55 - <u>See Attachment A</u>						acre-feet annually
55 - _____						acre-feet annually
55 - _____						acre-feet annually

2. Wells to be removed from certificate (list by ADWR registration number) and status of removed wells. If no wells are to be removed, write "None":

55 - <u>None</u>	not in use	capped	abandoned	exempt	pump cap: _____ gpm
55 - _____	not in use	capped	abandoned	exempt	pump cap: _____ gpm
55 - _____	not in use	capped	abandoned	exempt	pump cap: _____ gpm

PART III. GRANTOR AND GRANTEE OR CURRENT OWNER INFORMATION

SELLER/GRANTOR
OR CURRENT OWNER
(Print or Type)

BUYER/GRANTEE
OR OTHER OWNERS
OF NEW POINTS OF WITHDRAWAL
(Print or Type)

NAME Tucson Country Club

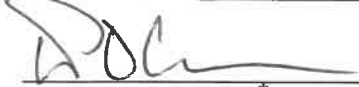
NAME Copper World LLC

ADDRESS 2950 N. Camino Principal
Tucson, AZ 85715

ADDRESS 5285 E. Williams Circle, Suite 2010
Tucson, AZ 85711

TELEPHONE (520) 918-0511

TELEPHONE () See Below**


SIGNATURE* 7-9-26
DATE

SIGNATURE* _____ DATE _____

POConnor@TucsonCountryClub.com
EMAIL ADDRESS

EMAIL ADDRESS _____

* Patrick O'Connor
General Manager & COO

* Robert Comer
Secretary

** For questions regarding this Notice, please
contact Rhett Billingsley at Fennemore Craig
by phone at (602) 916-5486 or email at
rbillingsley@fennemorelaw.com

NOTICE

A.R.S. § 41-1030(B), (D), (E) and (F) provide as follows:

B. An agency shall not base a licensing decision in whole or in part on a licensing requirement or condition that is not specifically authorized by statute, rule or state tribal gaming compact. A general grant of authority in statute does not constitute a basis for imposing a licensing requirement or condition unless a rule is made pursuant to that general grant of authority that specifically authorizes the requirement or condition.

D. This section may be enforced in a private civil action and relief may be awarded against the state. The court may award reasonable attorney fees, damages and all fees associated with the license application to a party that prevails in an action against the state for a violation of this section.

E. A state employee may not intentionally or knowingly violate this section. A violation of this section is cause for disciplinary action or dismissal pursuant to the agency's adopted personnel policy.

F. This section does not abrogate the immunity provided by section 12-820.01 or 12-820.02.

PART III. GRANTOR AND GRANTEE OR CURRENT OWNER INFORMATION

SELLER/GRANTOR
OR CURRENT OWNER
(Print or Type)

BUYER/GRANTEE
OR OTHER OWNERS
OF NEW POINTS OF WITHDRAWAL
(Print or Type)

NAME Tucson Country Club

NAME Copper World LLC

ADDRESS 2950 N. Camino Principal

ADDRESS 5285 E. Williams Circle, Suite 2010

Tucson, AZ 85715

Tucson, AZ 85711

TELEPHONE (520) 918-0511

TELEPHONE () See Below**

SIGNATURE* DATE

SIGNATURE* DATE

EMAIL ADDRESS

EMAIL ADDRESS

* Patrick O'Connor
General Manager & COO

* Robert Comer
Secretary

** For questions regarding this Notice, please
contact Rhett Billingsley at Fennemore Craig
by phone at (602) 916-5486 or email at
rbillingsley@fennemorelaw.com

NOTICE

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D. This section may be enforced in a private civil action and relief may be awarded against the state. The court may award reasonable attorney fees, damages and all fees associated with the license application to a party that prevails in an action against the state for a violation of this section.

E. A state employee may not intentionally or knowingly violate this section. A violation of this section is cause for disciplinary action or dismissal pursuant to the agency's adopted personnel policy.

F. This section does not abrogate the immunity provided by section 12-820.01 or 12-820.02.

Attachment A

**Wells to Be Added as Points of Withdrawal on
Certificate for Type 2 Non-Irrigation Grandfathered Groundwater Right No. 58-106007.0002**

Well Reg. No.	Twn.	Rng.	Sec.	160	40	10	Owner Name	Proposed Type 2 Withdrawals (Acre-Feet Annually)
55-225125	17S	14E	17	NW	SE	SE	Copper World LLC	75*
55-241987	17S	14E	17	NW	SE	SE	Copper World LLC	75*
55-241988	17S	14E	17	NW	SW	SW	Copper World LLC	75*
55-241989	17S	14E	29	SE	SW	NE	Copper World LLC	75*
55-242051	17S	14E	17	NW	SE	SW	Copper World LLC	75*

* Combined withdrawals from all added wells pursuant to Type 2 Right will not exceed 75 acre-feet per year.

Arizona Department of Water Resources

Groundwater Right/Facility Report

RIGHT #: 50-106007.0000

STATUS DATE: 8/27/2026

AMA: TUCSON AMA

RIGHT/PERMIT/FACILITY TYPE: TYPE 2 LEASES

LAND OWNERSHIP :

FILE STATUS: ACTIVE - ACTIVE

2026 ALLOTMENT: 75.00

BMP Enrollee: N

RETIRED ACRES: 0.00

CREDITS: .00

WATER DUTY ACRES: 0.00

IRRIGATION ACRES 0.00

WATER DUTY: 0

Mgt Plan 0

IRRIGATION DISTRICT NAME:

MAWA: 0

EXTINGUISHMENT CREDITS:

NAME & ADDRESS

COPPER WORLD LLC

TYPE: LESSEE

5285 E WILLIAMS CIRCLE, SUITE 2010

TUCSON

AZ

85711

PLACE OF USE

*** NO DATA FOUND ***

BOOK/MAP/PARCEL

*** NO DATA FOUND ***

WELL SERVING

Well#	55 - 241987	Location	SE SE NW 17 T17.0S R14.0E	Year	2026
Well#	55 - 225125	Location	SE SE NW 17 T17.0S R14.0E	Year	2026
Well#	55 - 241989	Location	NE SW SE 29 T17.0S R14.0E	Year	2026
Well#	55 - 242051	Location	SW SE NW 17 T17.0S R14.0E	Year	2026
Well#	55 - 241988	Location	SW SW NW 17 T17.0S R14.0E	Year	2026

RIGHT TO FACILITY RELATIONSHIPS

Related PCC	Relationship	Active Relationship	Reporting Flag
58-106007.0002	TYPE 2 LEASES	Y	Y

FENNEMORE.

Rhett A. Billingsley

Director

rbillingsley@fennemorelaw.com

2394 E. Camelback Rd., Suite 600

Phoenix, Arizona 85016-9077

PH (602) 916-5486 | FX (602) 916-5999

fennemorelaw.com

July 21, 2026

VIA E-MAIL AND HAND DELIVERY

Ciana Camacho
Conveyance Coordinator
Arizona Department of Water Resources
1110 W. Washington Steet, Suite 310
Phoenix, AZ 85007

RECEIVED

JUL 21 2026

**ARIZONA DEPARTMENT
OF WATER RESOURCES**

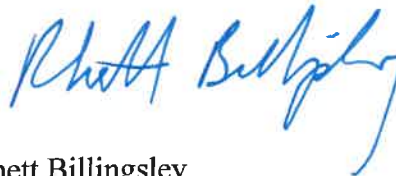
Re: Notice of Lease and Notice of Addition of Points of Withdrawal for Type 2 Right
No. 58-106007.0002 (Tucson Active Management Area)

Dear Ms. Camacho:

On behalf of our client, Copper World LLC ("Copper World"), we are submitting the enclosed Notice of Lease of Type 2 Right and Notice of Change in Points of Withdrawal for Type 2 Right No. 58-106007.0002 (the "Notices"). We have included the originals and copies of this letter and the Notices. Please date-stamp the originals and copies and received by the Department and return the date-stamped copies of the letter and Notices with our courier. Please contact Cecily Benson at our office for payment of the fees associated with Notices. You can contact Ms. Benson by email at cbenson@fennemorelaw.com and by phone at (602) 916-5015.

We would greatly appreciate it if the Department were able to process the enclosed Notices on expedited basis. Copper World needs to start groundwater withdrawal pursuant to the leased Type 2 Right as soon as possible to supply water for dust control purposes related to a construction project. Thank you for your understanding and prompt attention to the enclosed Notices.

Sincerely,



Rhett Billingsley

ARIZONA DEPARTMENT OF WATER RESOURCES

Mail to: 1802 W JACKSON ST BOX 79, PHOENIX, AZ 85007

NOTIFICATION OF LEASE OF ALL OR A PORTION OF A
TYPE 2 NON-IRRIGATION GRANDFATHERED RIGHT

INSTRUCTIONS

- Both the owner and the lessee must print name and sign this form.
 - This form is for a lease of a Type 2 Grandfathered Right. If there is a change of ownership of the Type 2 Grandfathered Right, please contact the Active Management Area at 602-771-8585.
- If a new well is to be added or removed from a Type 2 Grandfathered Right certificate, a Notification of Change of Ownership and/or Change in Point of Withdrawal for a Type 2 Grandfathered Right needs to be submitted in addition to this Notification of Lease

AMA: ☐ Phoenix ☐ Pinal ☐ Prescott ☐ Santa Cruz ☒ Tucson
Notification of: ☐ Lease ☐ Sub-Lease

The undersigned parties hereby notify the Arizona Department of Water Resources of the lease of all or a portion of the following Certificate of Type 2 Non-Irrigation Grandfathered Right:

RECEIVED

JUL 21 2026

ARIZONA DEPARTMENT
OF WATER RESOURCES

- Certificate of Grandfathered Right Number: 58- 106007 . 0002
- Amount of right indicated on the Certificate: 908.84 acre-feet per annum.
- Amount of right to be assigned to lessee: 75.00 acre-feet per annum.
- Amount of right still available for leasing: 833.84 acre-feet per annum.
- Duration of lease: from 1/1/2026 to 12/31/2027
month/day/year month/day/year
- Describe the lessee's intended non-irrigation use: Construction related uses

a. Is this right associated with an industrial facility (i.e. golf course, etc)? If so, please enter the name and/or facility number: N/A

b. List other rights associated with the proposed use: N/A

7. Well Information

Will the lease result in the temporary addition of one of more points of withdrawal from the well currently listed on the above referenced Certificate of Grandfathered Right? ☒ Yes ☐ No

OWNER
(Print or Type)

LESSEE
(Print or Type)

NAME Patrick O'Connor

NAME _____

COMPANY Tucson Country Club

COMPANY Copper World LLC

ADDRESS 2950 N. Camino Principal

ADDRESS 5285 E. Williams Circle, Suite 2010

Tucson, AZ 85715

Tucson, AZ 85711

PHONE (520) 918-0511

PHONE See Below**

[Signature] 7-9-26
SIGNATURE DATE

SIGNATURE DATE

EMAIL ADDRESS POConnor@TucsonCountryClub.com

EMAIL ADDRESS See Below**

* Patrick O'Connor
General Manager & COO

Robert Comer
Secretary

Send revised certificate: ☒ YES ☐ NO

** For questions regarding this Notice, please contact
Rhett Billingsley at Fennemore Craig by phone at
(602) 916-5486 or email at rbillingsley@fennemorelaw.com

If you have any questions regarding this matter, please contact the Active Management Area at (602) 771-8585

ARIZONA DEPARTMENT OF WATER RESOURCES
Mail to: 1802 W JACKSON ST BOX 79, PHOENIX, AZ 85007
**NOTIFICATION OF LEASE OF ALL OR A PORTION OF A
TYPE 2 NON-IRRIGATION GRANDFATHERED RIGHT**

INSTRUCTIONS

- Both the owner and the lessee must print name and sign this form.
 - This form is for a lease of a Type 2 Grandfathered Right. If there is a change of ownership of the Type 2 Grandfathered Right, please contact the Active Management Area at 602-771-8585.
- If a new well is to be added or removed from a Type 2 Grandfathered Right certificate, a Notification of Change of Ownership and/or Change in Point of Withdrawal for a Type 2 Grandfathered Right needs to be submitted in addition to this Notification of Lease

AMA: ☐ Phoenix ☐ Pinal ☐ Prescott ☐ Santa Cruz ☒ Tucson
Notification of: ☐ Lease ☐ Sub-Lease

The undersigned parties hereby notify the Arizona Department of Water Resources of the lease of all or a portion of the following Certificate of Type 2 Non-Irrigation Grandfathered Right:

1. Certificate of Grandfathered Right Number: 58- 106007 . 0002
2. Amount of right indicated on the Certificate: 908.84 acre-feet per annum.
3. Amount of right to be assigned to lessee: 75.00 acre-feet per annum.
4. Amount of right still available for leasing: 833.84 acre-feet per annum.
5. Duration of lease: from 1/1/2026 to 12/31/2027
month/day/year month/day/year
6. Describe the lessee's intended non-irrigation use: Construction related uses

- a. Is this right associated with an industrial facility (i.e. golf course, etc)? If so, please enter the name and/or facility number: N/A
- b. List other rights associated with the proposed use: N/A

7. Well Information

Will the lease result in the temporary addition of one or more points of withdrawal from the well currently listed on the above referenced Certificate of Grandfathered Right? ☒ Yes ☐ No

OWNER
(Print or Type)

NAME _____

COMPANY Tucson Country Club

ADDRESS 2950 N. Camino Principal
Tucson, AZ 85715

PHONE (520) 918-0511

SIGNATURE * DATE

EMAIL ADDRESS _____

* Patrick O'Connor
General Manager & COO

Send revised certificate: ☒ YES ☐ NO

If you have any questions regarding this matter, please contact the Active Management Area at (602) 771-8585

LESSEE
(Print or Type)

NAME Robert Comer

COMPANY Copper World LLC

ADDRESS 5285 E. Williams Circle, Suite 2010
Tucson, AZ 85711

PHONE See Below**

SIGNATURE * DATE

EMAIL ADDRESS See Below**

* Robert Comer
Secretary

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Rhett Billingsley at Fennemore Craig by phone at
(602) 916-5486 or email at rbillingsley@fennemorelaw.com

RECEIVED
JUL 21 2026
ARIZONA DEPARTMENT
OF WATER RESOURCES

Arizona Department of Water Resources

1110 West Washington Street, Suite 310

Phoenix AZ 85007

Customer:

FENNEMORE
PHOENIX OFFICE
2394 E. CAMELBACK RD
STE 600
PHOENIX, AZ 85016

Receipt #: 27-116388
Office: MAIN OFFICE
Receipt Date: 08/27/2026
Sale Type: IN_PERSON
Cashier: Thao Le

Item No.	Function Code	AOBJ	Description	Ref ID	Qty	Unit Price	Ext Price
78073	WRFREV	4339-TT	Revised certificate of type 2 non-irrigation grandfathered right to reflect new or additional points of withdrawal	58-106007.0002	1	250.00	250.00
RECEIPT TOTAL:							250.00

Payment type: CREDIT CARD

Amount Paid: \$250.00

Payment Received Date: 08/27/2026

Notes: FROM TTA.

Authorization 093409