

July 28, 2011

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

EBSA/PUBLIC DISCLOSURE
2011 SEP -7 PM 2:30

Re: Anaconda Foundry Fabrication Company, Inc. Management Phantom Stock Plan

Dear Sir or Madam:

Anaconda Foundry Fabrication Company, Inc. ("Company") is filing this notice with respect to the Anaconda Foundry Fabrication Company, Inc. Management Phantom Stock Plan ("Plan") pursuant to Department of Labor Regulation § 2520.104-23. The Company maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management and/or highly compensated employees. The Plan currently covers five employees.

The Company's address is 1015 East Sixth Street, Anaconda, MT 59711-2658 and the Company's Employer Identification Number is 81-0511412.

Sincerely,

Don Clark
VICE PRESIDENT

Certified Mail No.: 7009 2820 0004 4318 7986

SP-1481 v1

COPIES OF THIS DOCUMENT ARE AVAILABLE TO THE PUBLIC AT THE FOLLOWING URL: <http://www.dhs.gov/eis/whistleblower>

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE OFFICE OF THE INSPECTOR GENERAL, U.S. DEPARTMENT OF JUSTICE, AT (202) 755-3000.

THIS DOCUMENT IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE.

DATE OF REVIEW: 07/28/2011

BY: [Signature]

K&L | GATES

K&L Gates LP
618 West River
Suite 300
Spokane, WA 9

CERTIFIED MAIL



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08/29/2011

US POSTAGE



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