

STATE MINE INSPECTOR

APR 10 2023

RECLAMATION AND CLOSURE PLAN

STRUCTURES INVESTMENT LLC, INC.
BUCKEYE MATERIAL SOURCE

**SUBMITTED TO THE STATE MINE
INSPECTOR'S OFFICE FOR REVIEW AND
APPROVAL IN ACCORDANCE WITH
ARIZONA REVISED STATUTE
TITLE 27 - CHAPTER 6
STATE MINE INSPECTOR AGGREGATE
MINED LAND RECLAMATION**

APRIL 2023

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1.0 ADMINISTRATIVE INFORMATION

Company: Structures Investment, LLC

Contact: Kevin Thorpe
Structures Investment, LLC
1635 N. Greenfield Rd., Suite 106
Mesa, AZ 85205
Office (480) 988-3550

Applicant: Gaylord Bob Yost
Structures Investment, LLC
1635 N. Greenfield Rd., Suite 106
Mesa, AZ 85205
Office (480) 988-3550

Permit Technical Consultant: Jill Himes, Himes Consulting LLC
3301 West Genoa Way
Chandler, AZ 85226
(480) 899-5708 (office)
(602) 499-9253 (cell)
jillhimes@cox.net

Landowner: Gaylord Bob Yost
Structures Investment, LLC
1635 N. Greenfield Rd., Suite 106
Mesa, AZ 85205
Office (480) 988-3550

Parcel No: 401-72-004A

Operator: Tim Lashley
DBY Mining, LLC
1635 N. Greenfield Rd., Suite 106
Mesa, AZ 85205

2.0 INTRODUCTION

2.1 PURPOSE AND SCOPE

Structures Investment, LLC proposes to continue to conduct aggregate mining and processing at their property in south Buckeye, Maricopa County, Arizona. The Buckeye Material Source is an existing aggregate mine located within the NE ¼ of Section 5, Township 4 South, Range 4 West, Gila and Salt River Meridian, Maricopa County, Arizona. The project area lies about 2 miles west of SR 85 and east of the Gila River.

The purpose of this Mine Reclamation and Closure Plan (MRCP) is to present the details of rehabilitation of the Buckeye Material Source in Maricopa County, Arizona concurrent with or after mining operations have ceased in accordance with the Arizona Aggregate Mined Lands Act (AAMLRA) (Arizona Revised Statutes[A.R.S.] § 27-1201 as authorized by A.R.S. § 27-1204. This plan has been developed pursuant to the format and content prescribed in the Arizona Aggregate Mined Lands Reclamation Rules (Arizona Administrative Code {A.A.C}, R11-3-101, et seq.). The MRCP addresses environmental, technical and operational issues that are identified in those documents.

2.2 RECLAMATION STATEMENT OF RESPONSIBILITY

Structures Investment, LLC assumes responsibility for the reclamation of surface disturbances that are attributable to the aggregate mining unit consistent with A.R.S. §. 27-1201 and A.C.C. R11-3-501 pursuant to that chapter. All areas that have been disturbed at the site will be reclaimed to a safe and stable condition when mine operations conclude.

Bob Spant 3/22/23
Signature Date

Manager
Title

2.3 RECLAMATION APPROACH

Structures Investment, LLC will reclaim areas surrounding and within the excavated areas necessary to accomplish the post-mining land use of open space. The goals of the mine plan and reclamation measures are to provide for a safe, stable, and sustainable site once mining has ceased. Reclamation will take place concurrently to the degree possible, but no later than the cessation of mining activities.

2.4 CURRENT OWNERSHIP AND LAND USE INCLUDED IN THE AGGREGATE MINING UNIT

Structures Investment, LLC is conducting aggregate mining and processing operations for commercial use at the Buckeye Material Source. The site boundary consists of 57.55 acres, and includes disturbed areas as shown in Table 1 below, and in Figure 3. The extraction/processing operation consists of mining to remove aggregate material as described in A.R.S. § 27-441. At the Buckeye Material Source, material is currently excavated from an approximate 2.5-acre area, stockpiled, screened, crushed, and washed in the processing area. Operations include excavation, stockpiling, screening, conveying, crushing, washing, loading, and hauling. The haul road and processing area have been graded for use, as shown in Figure 3. Access is from Old US 80 and existing farm roads. Land use is currently open space, prior farmland, and mining. Structures Investment, LLC has estimated the removal of up to 5.25 million tons of aggregate over a period of 20 years.

The project vicinity lies within the Lower Colorado River subdivision of the Sonoran Desertscrub vegetation community as described by Brown (1994). However, the site has been farmed for over 100 years with no native vegetation remaining. Site vegetation is limited to alfalfa, weeds, and grasses.

The project site is located within Arizona Game and Fish Department (AGFD) Game Management Unit 39. In the vicinity of the project area, this unit is managed for mule deer, javelina, dove, and quail. Wildlife and/or wildlife sign observed in the project vicinity include Savannah sparrow (*Passerculus sandwichensis*), Vesper sparrow (*Pooecetes gramineus*), horned lark (*Eremophila alpestris*), killdeer (*Charadrius vociferus*), American pipit (*Anthus rubescens*), rock wren (*Salpinctes obsoletus*), dark-eyed junco (*Junco hyemalis*), red-tailed hawk (*Buteo jamaicensis*), and coyote (*Canis latrans*).

Table 1
Existing Surface Disturbance

Feature	Acres
Haul Road	2.25
Mining	2.5
Processing Area	10.0
Disturbed Farmland	42.8
Total	57.55

2.5 PROPOSED POST-AGGREGATE MINING LAND USE

Proposed post-aggregate mining land use of the site is open space. Current nearby use is open space and agriculture.

2.6 DESCRIPTION OF THE AGGREGATE MINING UNIT AND PROPOSED SURFACE DISTURBANCES

Currently the site includes a small material source, graded processing area with parking area, and an existing haul road. Proposed surface disturbances include increasing the aggregate mining to a final disturbance of approximately 40 acres. The mining areas will extend to the northwest, southeast, and east over the life of the mine, as shown in Figure 4, with 2:1 slopes incorporated into their mining plan. Stockpiles will occur in the area of immediate mining and in the processing area. The processing area has been graded and is not proposed to increase in size. The processing area currently includes stockpiles, a screen, wash plant, ponds, and a crusher, and will include a ready-mix plant in the future. Parking, a scale, and scale house occur in the eastern portion of the processing area. The entire site is currently fenced. Proposed surface disturbances are shown in Table 2 below.

Table 2
Proposed Final Surface Disturbance

Feature	Acres
Mining Area	40.0
Haul Road	2.25
Processing Area	10.0
Perimeter Buffer	5.3
Total	57.55

2.7 EXISTING AND PROPOSED FINAL TOPOGRAPHY

Existing topography and survey information is provided in Figure 3 attached. Existing elevations at the site are fairly flat (696 feet above mean sea level (msl)) with the exception of the existing material source pit (678.86 ft above msl) and adjacent overburden pile (720.88 ft above msl). Proposed final elevations are shown in Figure 4 attached. Proposed final topography of the slopes will have an overall 2:1 slope at the end of mine life.

2.8 A NARRATIVE DESCRIPTION OF ROADS

One existing haul road occurs within the site, as shown in Figures 3 and 4. This haul road is not proposed to change over the life of the mine.

2.9 ACREAGE AFFECTED BY EACH TYPE OF SURFACE DISTURBANCE

Area Descriptions:

2.9.1 Mining Area

Aggregate mining at this site would impact a total of 40.0 acres of previously-disturbed farmland, including the 2.5 acres of the existing mining area. Slopes are planned at 2:1. Final build-out is shown in Figure 4. Stockpiles will be temporarily placed in the immediate mining area during excavation.

2.9.2 Haul Road

The existing haul road extends from the entrance in the northeast corner to the west. The haul road is not proposed to change in the future and is shown in Figures 3 and 4.

2.9.3 Processing Area

The existing processing area consists of approximately 10.0 acres and has been completely graded along the northeast end of the site. The processing area currently includes conveyors, a screen, a crusher, and a wash plant/ponds on the western side, and parking and a scale with scalehouse on the eastern side. A ready-mix area is planned for the central portion of the processing area.

3.0 RECLAMATION

3.1 EQUIPMENT AND STRUCTURE REMOVAL

All equipment proposed on this site is mobile and can be re-located at will throughout the mining process, with the exception of the wash plant. The wash plant slab will be removed. The concrete pre-cast feed tunnel will be removed, along with the steel culvert pipe at the pond. All mobile equipment will be removed from the site.

3.2 ROADS, POWER LINES, WATERLINES AND FENCES

Permanent power lines are located outside the fenced area along the northern boundary from the northeast corner running westerly to half the distance of the property. These will remain at the request of the landowner post-mining. There are no waterlines within the site. No hazardous conditions will remain at the end of reclamation. The site is currently entirely fenced with a locked entrance gate.

3.3 AREA PREPARATION

Post-mining, the site interior will be re-graded and scarified to promote natural revegetation, as shown in Figure 5.

3.4 SLOPE STABILIZATION

Mining incorporates 2:1 (horizontal:vertical) slopes or flatter to result in stability for the area. No additional physical stabilization will be necessary after mining.

3.5 SOIL CONSERVATION

Natural revegetation on previously disturbed areas in the vicinity has been previously successful. Natural revegetation of the disturbed areas is therefore reasonably expected to be successful without soil amendments.

3.6 REVEGETATION

To promote natural revegetation, scarification will be conducted within the disturbed areas to support the open space land use of the site. Since these areas are not proposed to support grazing, fish or wildlife habitat, forestry or recreation post-mining land uses, proposed measures to encourage fish and wildlife habitat are not required to be described further in accordance with A.R.S. §27-1271 (B)(9d).

3.7 THE PROPOSED RECLAMATION MEASURES TO ACHIEVE POST MINE LAND USE AND PUBLIC SAFETY

- A. What measures will restrict public access to pits or other hazardous surface features?
As the mined slopes are proposed at 2:1, no hazardous surface features are anticipated to remain after reclamation. The site is currently entirely fenced with a locked gate. In addition, all scrap metal, wood, trash and other debris that pose a threat to public safety or create a public nuisance will be removed from the project site.
- B. What measures will be taken to address erosion control and stability?
Site-specific grading shall be conducted, as necessary, to address erosion. No permanent piles of mined material or overburden will remain. Slope stability at a 2:1 slope is incorporated into the mining plan.
- C. What measures will be taken to address revegetation, conservation, and the care and monitoring of revegetated areas?
Scarification would promote natural revegetation which occurs in the region. As revegetation is not proposed, monitoring of revegetated areas is not required.

3.8 TIMELINE AND PHASING OF RECLAMATION

Mining will begin immediately upon approval. In accordance with A.R.S. § 27-926, reclamation & monitoring will be completed within one year of cessation of mining. Proposed tentative schedule includes:

- Mining operations are anticipated to continue for 20 years until 2043.
- Reclamation will commence immediately upon completion of mining operations and is estimated to be completed within one year (estimated 2044).
- Year 1 includes equipment removals and annual monitoring.
- Year 2 includes grading, scarification to promote natural revegetation, and annual monitoring (trash removal, natural revegetation monitoring).
- Reclamation will be deemed complete once the reclaimed surfaces have been regraded to a safe and stable condition, scarification has been conducted, and ASMI verifies that the owner or operator has fulfilled the requirements of the approved reclamation plan.

3.9 RECLAMATION COSTS – FINANCIAL ASSURANCE

All reclamation costs will be wholly born by the applicant. Financial surety will be obtained by bonding.

4.0 MINE CLOSURE

4.1 MINING AREAS

Reclamation of the mining area will commence immediately upon closure of mining operations. There will be no substantial period between operation and reclamation.

4.2 PROCESSING AND OTHER AREAS

Stockpile areas will be removed by the end of mine life. Reclamation will commence immediately upon completion of mining operations. There will be no substantial period between operation and reclamation.

4.3 PERSONNEL

Personnel employed at this site will be re-assigned to other job sites if possible or assigned to assist with the reclamation process and then re-assigned.

4.4 MONITORING

The closure of operations at this site will be monitored in accordance with the approved conditions of this plan in accordance with the Arizona State Mine Inspector's Office. During reclamation, monitoring will occur annually to remove trash and conduct a general inspection.

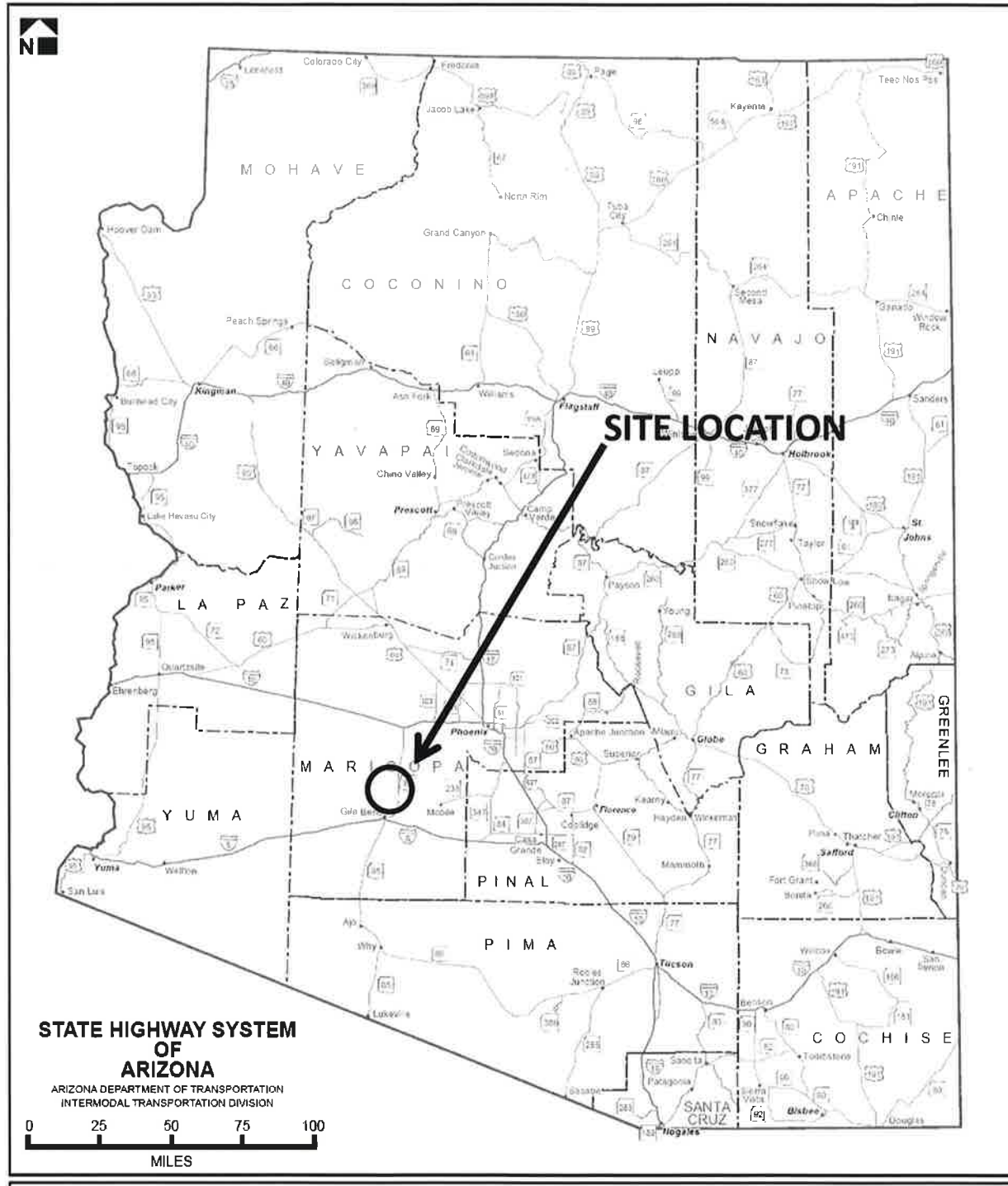


Figure 1. State Map.
Structures Investment, LLC Buckeye Material Source.
Maricopa County, AZ.



Figure 2. Vicinity Map
Structures Investment, LLC Buckeye Material Source,
Maricopa County, AZ.
Google Earth: 07-2022

FIGURE 3 - EXISTING CONDITIONS

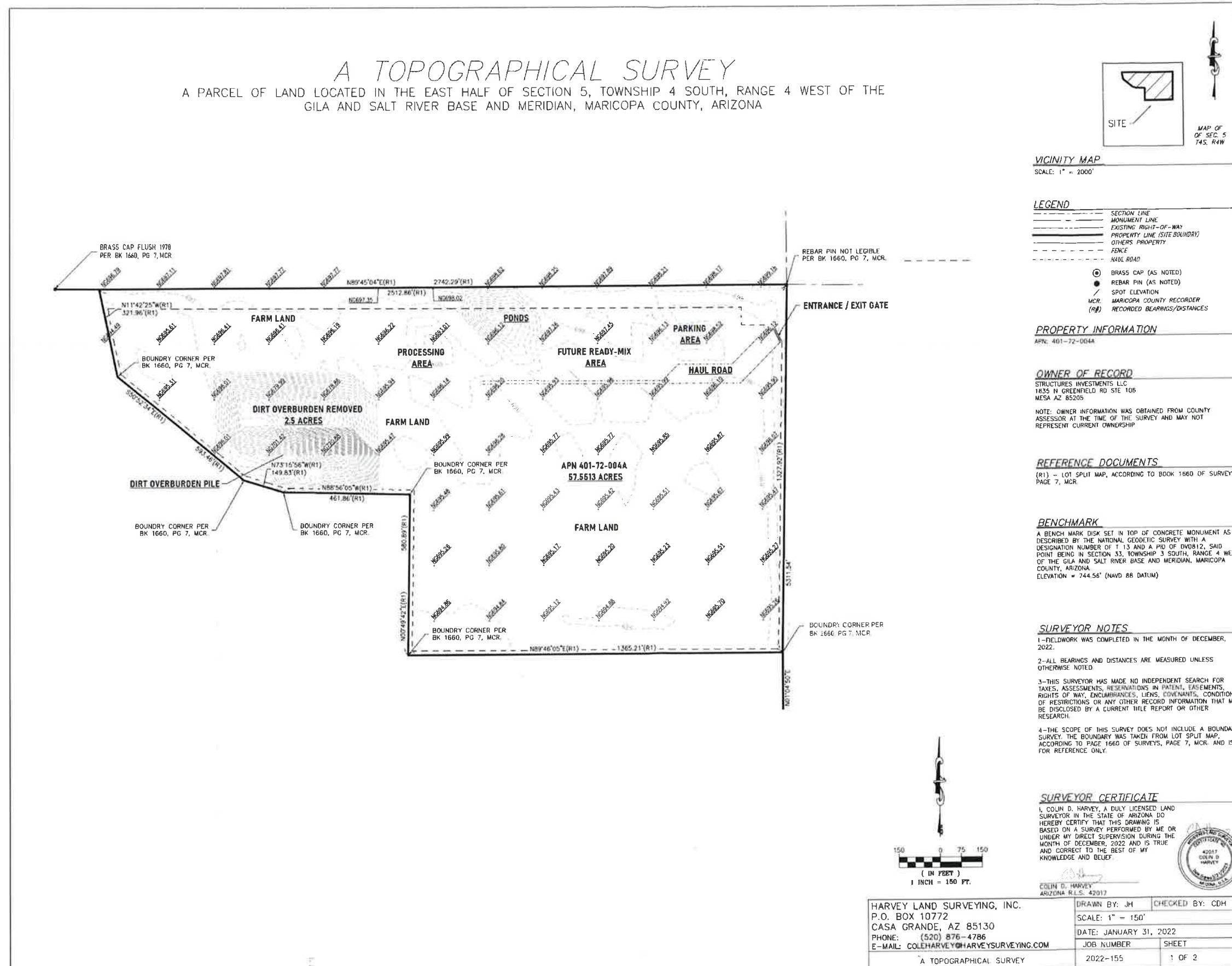
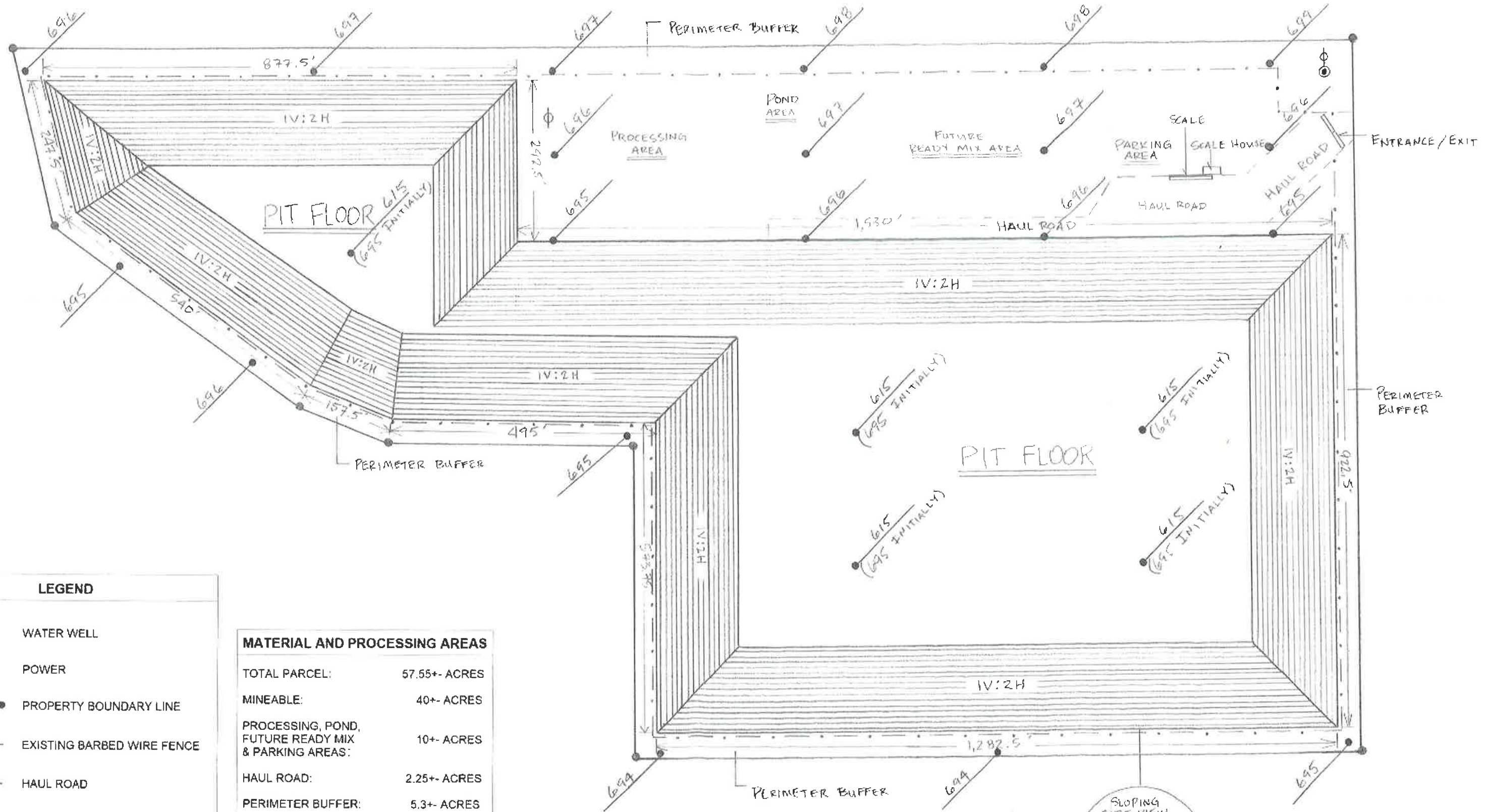


FIGURE 4 - PROPOSED CONDITIONS

STRUCTURES INVESTMENT, LLC

APN 401-72-004A

EAST HALF OF SECTION 5, TOWNSHIP 4 SOUTH, RANGE 4 WEST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, MARICOPA COUNTY, ARIZONA



LEGEND

- WATER WELL
- POWER
- PROPERTY BOUNDARY LINE
- EXISTING BARBED WIRE FENCE
- HAUL ROAD
- ELEVATION
- 1:V 2H SLOPING 10' CONTOURS

MATERIAL AND PROCESSING AREAS

TOTAL PARCEL:	57.55+- ACRES
MINEABLE:	40+- ACRES
PROCESSING, POND, FUTURE READY MIX & PARKING AREAS:	10+- ACRES
HAUL ROAD:	2.25+- ACRES
PERIMETER BUFFER:	5.3+- ACRES

SOURCE MATERIAL AVAILABLE

TOTAL MINING AREA:	40+- ACRES
TOTAL VOLUME:	7,680,000 TONS



SCALE: 1/4" = 45'

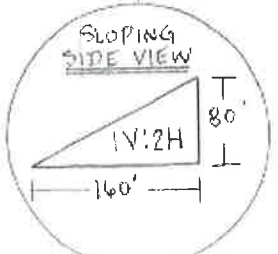
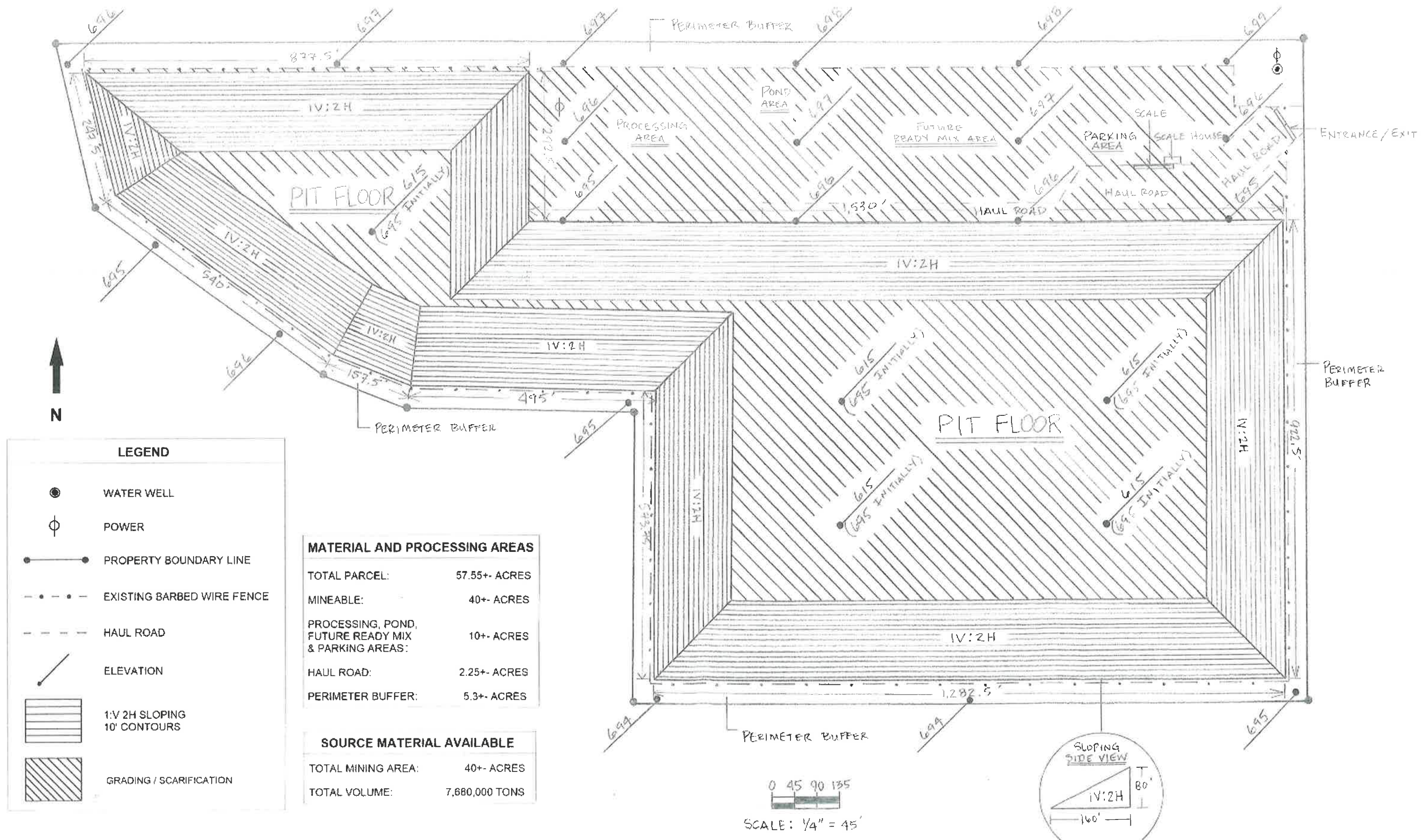


FIGURE 5 - RECLAMATION

STRUCTURES INVESTMENT, LLC

APN 401-72-004A

EAST HALF OF SECTION 5, TOWNSHIP 4 SOUTH, RANGE 4 WEST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, MARICOPA COUNTY, ARIZONA



APPENDIX 1
RECLAMATION COST ESTIMATE

STRUCTURES INVESTMENT, LLC

Reclamation Cost Estimate

2/13/2023

APN 401-72-004A is Located in the East Half of Section 5, Township 4 South, Range 4 West of the Gila and Salt River Base and Meridian, Maricopa County, Arizona

The entire property has been farmed with alfalfa, cotton, corn and other crops for over 100 years.

Total Acres: 57.55+-

Mineable Acres: 40+-

Haul Road Acres: 2.25+-

Processing Area Acres: 10+-

Unit Cost Source: Southwest Fleet Management

Reclamation Item	Units	Description	Suggested Cost	# of Units	Reclamation Cost
Processing Area	Acre	Re-Grading & Leveling	\$500	10	\$5,000
	Acre	Scarification	\$80	10	\$800
	Acre	Revegetation Cost (Hydro-Seed)	\$0	0	\$0
Haul Roads	Acre	Re-Grading & Leveling	\$200	2.25	\$450
	Acre	Scarification	\$80	2.25	\$180
	Acre	Revegetation Cost (Hydro-Seed)	\$0	0	\$0
Structures (Break-up & Bury)	SF	Dismantle Wash Plant	\$10	500	\$5,000
	LF	Remove 18" PVC Pipe @ Wash Plant	\$3	150	\$500
	SF	Slab & Footings over 6' Deep	\$5	500	\$2,500
	LS	Power Remains	\$0	0	\$0
	LS	Transformer Remains	\$0	0	\$0
	LF	Barbed Wire Fence Remains	\$0	0	\$0
	SF	Remove Concrete Pre Cast Feed Tunnel	\$2.50	1,500	\$3,750
	LS	Scale Footings & Aprons	\$250	4	\$1,000
	LF	Remove 10" Steel Culvert Pipe @ Pond	\$7	40	\$280
	Each	Remove Portable Processing Equip.	\$500	25	\$12,500
LS	Remove Scale and Scale House	\$1,000	1	\$1,500	
Material Hauling For Backfill	Acre	Slope Backfill as we Mine	\$250	40	\$10,000
Care and Maintenance	Each	Processing Area Cleanup	\$2,000	1	\$2,000
	Annual	Site Monitor & Reporting	\$500	1	\$500
Estimated Reclamation Operating and Material					\$45,960
Administrative Costs					
(O&M Cost)	%	Contingency	10%		\$4,596
(O&M Cost)	%	General Mobilization/De-Mobilization	4%		\$1,838.40
(O&M Cost)	%	Indirect Costs	2%		\$919.20
(O&M Cost)	%	Contractor Profit	10%		\$4,596
(O&M Cost)	%	Contract Administration	10%		\$4,596
Total Estimated Financial Assurance					\$62,505.60

Submitted By: Craig Hills