

August 30, 2023

Arizona State Mine Inspector (ASMI)
Paul D Marsh
1700 W Washington Street Ste#403
Phoenix, AZ 82007-2805

Re: Comment/Responses Relative to Reclamation Plan for Turner North Aggregate Mine

Enclosed are the revised pages of the Turner North Aggregate Mine Reclamation Plan, submitted to ASMI on May 24th, 2023. These revisions specifically address the technical review comments listed in the Technical Incompletion letter from the State Mine Inspector's Office dated July 19th, 2023. VESPRO has included detailed responses describing how each comment from ASMI was resolved, in compliance with the Arizona Revised Statutes governing aggregate mine reclamation.

Comments by Paul Marsh
[Response by VESPRO](#)

1. Comment #1: Wildlife Habitats – For previously undisturbed areas, please identify on a map any types of fish, and wildlife habitats that will be disturbed per A.R.S. 27-1271 (B.8)

Response: There are no fish types or wildlife habitats are shown in this mine site area, per IPAC search results shown on the AZ Game and Fish Map, included as Figure 2 Vicinity Map in the report. Clarification was made in the first paragraph of Section 2.4 stating no wildlife habitats or types of fish, that are currently undisturbed, will be disturbed by the proposed mine site operating within the subject area, per A.R.S. 27-1271 (B.8).

2. Comment #2: Access Restrictions – Section 2.7: please clarify that fencing will surround the entirety of the site with appropriate signage.

Response: Landowner requested the use of a berm, at a minimum of 4 feet high and combined with boulders, placed in a contiguous fashion to create an access barrier to the public but only around the disturbed mining areas, as described in Section 2.7. Detail 1 shows the proposed Berm and Boulder Barrier on Exhibit 3 in the Reclamation Plan

Warning and directional signage will be securely placed, as described in Section 2.7 on the first paragraph of page 12, at all potential access and emergency routing locations, as necessary and per approval by the City of Buckeye.

3. Comment #3: Removal of Material and Equipment – Section 3.2: Please include a state indicating that all equipment and material will be removed from the site.

Response: Added statement to Section 3.2: "all equipment and stockpiled material will be removed from the site upon closure of the mine site."

4. Comment #4: Financial Assurance – The reclamation costs are to be computed assuming that third parties will perform the reclamation measures per A.R.S. 27-1292 (B).

Response: Estimated reclamation costs were updated to include references to third party estimates shown each worksheet with updated grading equipment rental costs with mobilization rates added. Cost Estimates were based on the following sources, as shown in Appendix B:

- 1) Recent ADOT Bid tabulations publicly listed on the website within the previous year.
- 2) Equipment leasing and mobilization costs from a local heavy equipment rental operation within 5 miles of the mine site (Empire Equipment Rental).
- 3) RS Means to estimate the labor and equipment removal costs for 2023 as published by the U.S. Bureau of Labor Statistics.
- 4) Caterpillar's Performance Handbook edition 50.

5. Comment #5: Liquidation of material and equipment as discussed in Sections 3.1, 3.2, and 3.7 of this reclamation plan are not relevant; please remove.

Response: Removed all irrelevant references to the Liquidation of material and equipment from sections 3.1, 3.2, and 3.7.

6. Comment #6: Please cite third-party sources for reclamation estimates.

Response: See previous response to Comment 4. All third party sources are cited with support documentation for all assumed conditions or calculated quantities.

7. Comment #7: Page 3 - Capitalize "Range" in the White Tank Mountain Range" or change to "the White Tank Mountains".

Response: Changed the wording to "the White Tank Mountains" on page 3.

8. Comment #8: Page 5, Section 2.2 – Spell-out "Assessor's Parcel Number (APN)."

Response: Spelled-out the "Assessor's Parcel Number (APN)." On page 5 in Section 2.2.

9. Comment #9: Page 20 – The first paragraph is unattached to a section.

Response: Fixed the placement of the first paragraph within the section so that it doesn't appear to be detached.

10. Comment #10: Page 15, Section 3.4 – Last sentence should read, "Permanent basins will remain."

Response: Added "will" to the last sentence on Page 15, Section 3.4, as requested.

11. Comment #11: Throughout – When discussing slope ratios, please include "Horizontal (H)" and "Vertical (V)" after the numeral.

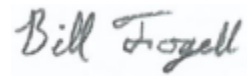
Response: Changed all slopes to include "Horizontal (H)" and "Vertical (V)" or 'H' and placed a 'V' after each number defining the slope indicated.

12. Comment #12 – Remove relative, subjective, and superfluous adjectives (i.e., small, unlikely, etc.).

Response: Removed relative, subjective, and superfluous adjectives from the text and updated the wording throughout or added clarification where appropriate.

Should there be any questions regarding the response provided please feel free to contact me at (602) 367-0119.

Sincerely,

A handwritten signature in black ink that reads "Bill Fogell". The signature is written in a cursive, slightly slanted style.

Bill Fogell, PE
Project Engineer
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