

SEP 28 2022

Himes Consulting LLC

September 26, 2022
Reference No. 21-46

Arizona State Mine Inspector
Amanda Lothner, Reclamation Specialist
1700 W. Washington, Suite 403
Phoenix, AZ 85007-2805

Re: Reclamation Plan Corrections for Sun Cor Shelton Pit in Cochise County, AZ.

Dear Ms. Lothner:

Three technical comments were received on February 14, 2022 for the Shelton Pit and fully addressed and resubmitted. Additional new technical comments were received on May 20, 2022. Five new technical comments were received on September 7, 2022. Two copies of the corrected pages for these five new comments are attached and addressed as follows:

The text of the Plan is corrected as follows:

1. In Section 2.4, the hyphen between previously and disturbed has been removed.
2. In Section 2.5, the term "low-density" has been removed.
3. In Sections 2.9.3 and 3.7, the term "project" has been removed.
4. In Section 3.4, the term "geotechnical" has been removed.
5. In Section 4.1, the terms "within three months" have been replaced with the term "immediately".

Please feel free to contact me in regards to any questions.

Sincerely,

HIMES CONSULTING, LLC
Jill A. Himes, Biologist

cc: Dean Harguess, Sun Cor Underground, Inc.

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

Sun Cor is conducting aggregate mining and processing operations for commercial use at the Shelton Pit. The existing pit was originally mined in the 1960's. Approximately one-third of the site is previously disturbed as shown in Figure 3. The extraction/processing operation consists of mining to remove aggregate material as described in A.R.S. § 27-441. At the Shelton Pit, the process includes the use of a screen and other mobile equipment for the support of production, and other construction material related operations. Simple operations currently consist of excavation, screening, stockpiling, loading, and hauling. Access is from E. Shelton Road to an existing 0.1-mile long access road. Land use is currently mining and open space. The mining boundary includes approximately 40 acres plus the existing access road to Shelton Road, as shown in Table 1 below. Sun Cor has estimated the removal of up to 1.57 million cubic yards over a period of 25 years.

The project vicinity lies within the semidesert grassland vegetation community as described by Brown (1994). Approximately one-third of the site is previously disturbed. Vegetation observed in the project vicinity includes mequite (*Prosopis juliflora*), catclaw acacia (*Acacia greggii*), snakeweed (*Gutierrezia sarothrae*), burroweed (*Isocoma tenuisecta*), silverleaf nightshade (*Solanum elaeagnifolia*), and four wing saltbush (*Atriplex canescens*). The project site is located within Arizona Game and Fish Department (AGFD) Game Management Unit 30A. In the project area, this unit is managed for antelope (*Antilocapra americana*), black bear (*Ursus americanus*), mule deer (*Odocoileus hemionus*), white-tailed deer (*Odocoileus virginianus*), javelina (*Tayassu tajacu*), quail (*Callipepla gambelii*), and dove (*Zenaida macroura*).

Table 1
Existing Surface Disturbance

Feature	Acres
Mining Area	11.7
Plantsite	0.5
Equipment Storage	0.25
Access Roads	0.42
Subtotal Disturbed Area	12.87
Undisturbed	27.37
Total	40.24

2.5 PROPOSED POSTAGGREGATE MINING LAND USE

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

2.9 ACREAGE AFFECTED BY EACH TYPE OF SURFACE DISTURBANCE

Area Descriptions:

2.9.1 Mining Area

Aggregate mining at this site would impact approximately 27 additional acres of undisturbed area. Excavation would encompass the entire 40 acres. Final build-out is shown in Figure 4.

2.9.2 Plantsite

The screen plant occurs in the southern portion of the site. The screen plant is mobile and may move around throughout the life of the mine. No other changes are planned to the plantsite area.

2.9.3 Equipment Storage

Equipment storage occurs within the southeastern portion of the site. The limits of the equipment storage area would remain relatively the same.

2.9.4 Stockpiles

Stockpiles are currently located in the vicinity of the screen plant. Stockpiles are anticipated to grow during mining.

2.9.5 Access Roads

The existing 0.1-mile access road to Shelton Road is not proposed to change. Internal access roads are minor and may change over time as mining advances; however, all internal mining roads will be mined out. Existing access roads are shown in Figures 3 and 4.

3.0 RECLAMATION

3.1 EQUIPMENT AND STRUCTURE REMOVAL

All equipment on this site is mobile and can be re-located at will throughout the mining process. All mobile equipment will be removed from the site. There are no buildings or structures proposed to be located on the site. The main entrance is currently gated and locked to prevent public access.

3.2 ROADS, POWER LINES, WATERLINES AND FENCES

The existing access road off of Shelton Road will be retained as requested by the landowner. All other internal access roads will be mined out, as shown in Figure 4. There are no powerlines that occur within the site. There are no waterlines within the site. Mobile generators are used on an as-needed basis for the mining equipment which will be removed post-mining. The site is currently bermed along the eastern side and the entrance gated and locked. In addition, the landowner's property boundary on the western side is fenced. Relatively thick vegetation prevents vehicular access from Shelton Road. An existing fence occurs from Shelton Road south on the adjacent property to the east.

3.3 AREA PREPARATION

Post-mining, the site interior will be re-graded and scarified to promote natural revegetation.

3.4 SLOPE STABILIZATION

Mining incorporates 3:1 (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 have been successful on the southern side of the existing mining area. 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 3:1, no hazardous surface features are anticipated to remain after reclamation. Existing fences at the property will remain as shown in Figures 3-5 to prevent vehicular access. Additional fencing is not proposed per landowner request; however the access road would remain gated, locked, and bermed on the east side to prevent access as existing. 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 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. The pit is bermed on the east side to reduce stormwater run-on into the pit.

C. What measures will be taken to address revegetation, conservation, and the care and monitoring of revegetated areas?

Based on the final contours and topography, as shown in Figures 4 and 5, the pit would retain stormwater that falls directly onto the site to promote vegetation growth. Scarification would promote natural revegetation which occurs in the region.

3.8 TIMELINE AND PHASING OF RECLAMATION

Mining will reinitiate immediately upon approval, anticipated in late 2022. In accordance with A.R.S. § 27-926, reclamation & monitoring will be completed within 2 years of cessation of mining. Proposed tentative schedule includes:

- Mining operations are anticipated to continue for 25 years until 2047.
- Reclamation on the processing and related areas will commence immediately upon completion of mining operations and is estimated to be completed within 2 years (estimated 2049).
- Year 1 includes equipment removal, processing area cleanup, light grading, scarification to promote natural revegetation, and annual monitoring (trash removal, natural revegetation monitoring).
- Year 2 includes annual monitoring.
- Reclamation will be deemed complete once the reclaimed surfaces have been regraded to a safe and stable condition, scarification has been conducted, access restrictions measures are in place, and ASMI verifies that the owner or operator has fulfilled the requirements of the approved reclamation plan.

4.0 MINE CLOSURE

4.1 MINING AREAS

Reclamation of the mining area will commence immediately upon closure of mining operations.

4.2 PROCESSING AND OTHER AREAS

Stockpile areas will be removed by the end of mine life. Reclamation will commence within three months of completion of mining operations.

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 inspect the main gate and lock, remove trash, monitor natural revegetation of scarified areas, and conduct a general inspection.
