



3 April 2023
File No.: 0205062

Arizona State Mine Inspector
1700 West Washington Street #403
Phoenix, Arizona 85007

ATTENTION: Paul Marsh

SUBJECT: Technically Incomplete Response to Comments for CalPortland
Rio Rico Plant Reclamation Plan Significant Amendment

Dear Mr. Marsh:

CalPortland Company (CalPortland) and Haley & Aldrich, Inc. (Haley & Aldrich) have reviewed the Arizona State Mine Inspector (ASMI) correspondence dated 27 February 2023 regarding the technically incomplete significant amendment to an approved Reclamation Plan for the CalPortland Rio Rico Plant in Rio Rico, Arizona (Attachment A). The following presents CalPortland's response to ASMI's request for missing information.

GENERAL COMMENTS

Comment 1: Post Aggregate Mine Use

The plan amendment states the Post Mine Land Use is naturalized open space. However, the plan also states that septic tanks would remain in place. The septic tanks must be removed to be consistent with the stated PMLU.

Response to Comment 1:

The remaining infrastructure for the site to be left in place will be an asset to the property for the post mining land use. We have changed the post mining land use to commercial use.

Attachment B presents the revised Reclamation Plan Amendment.

Comment 2: Wildlife in Previously Undisturbed Areas

Please cite the source indicating that there are no wildlife habitats that would be disturbed.

Response to Comment 2:

Haley & Aldrich reviewed the Arizona Game and Fish Department website and GIS map at the following link: <https://ert.azgfd.gov/content/map>. No significant fish and wildlife habitats are present within the area of the site. This includes all previously disturbed and disturbed areas planned in the future. Haley & Aldrich did not revise Figures as there are no affected habitats within the previously disturbed or the future disturbed project areas.

Comment 3: Section 2.3.1: Third Bullet Point

Define "small" or remove.

Response to Comment 3:

Section 2.3.1 has been updated to reflect the comment above. Attachment B presents the revised Reclamation Plan Amendment.

Comment 4: Section 2.9

This section is not appropriate for the reclamation plan. Please remove.

Response to Comment 4:

We respectfully disagree with this comment. This statement within Section 2.9 has been included in over 100 approved reclamation plans. We feel that it is appropriate and reflects the unpredictability of the construction materials market and the future economics of the mine and industry. The language is important as it preserves the operator's ability to modify this plan, subject to approval by ASMI, to adapt their operations to changing environments or future market conditions.

CalPortland appreciates the opportunity to address ASMI's comments. If you have any questions or comments, please don't hesitate to contact me at 520.572.3514.

Sincerely,



Tori Tang
Environmental Manager

Attachment A – ASMI Technically Incomplete Letter Dated 27 February 2023
Attachment B – Revised Rio Rico Significant Reclamation Plan Amendment

ATTACHMENT A

ASMI Technically Incomplete Letter Dated 27 February 2023

ATTACHMENT B

Revised Rio Rico Significant Reclamation Plan Amendment