

AUG 01 2023

Himes Consulting LLC

July 26, 2023
Reference No. 22-08

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

Re: Reclamation Plan for Structures Investment, Inc. Buckeye Material Source

Dear Ms. Lothner:

Enclosed please find two copies of the revised pages of the Reclamation and Closure Plan for Structures Investment, Inc.'s Buckeye Material Source in response to your June 8 Technical Comments,

All technical comments were incorporated into the plan, with the exception of comment 3 in Section 2.4:

Identify any types of fish and wildlife habitats that will be disturbed. As described in Section 2.4 the site has been farmed for over 100 years with no native vegetation remaining. The site is 100 percent disturbed. "Farmland" is included on Figure 3 which describes the current disturbed habitat.

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

Sincerely,

A handwritten signature in black ink that reads "Jill A. Himes".

HIMES CONSULTING, LLC
Jill A. Himes

RECLAMATION AND CLOSURE PLAN

STRUCTURES INVESTMENT, LLC
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**

MARCH 2023

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 Baseline and 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.

Kurt P. Hays

7/18/23

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.

2.6 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 (H:V) 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. As shown in Figure 4, proposed depth of excavation is 80 feet. Proposed final topography of the slopes will have an overall 2:1 (H:V) 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.

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 (H:V) 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 (H:V), 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 (H:V) 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.