

DEC 10 2024

PMG Letterhead

December 6, 2024

Mr. Paul Marsh
Arizona State Mine Inspector
1700 West Washington Street, Suite 403
Phoenix, Arizona 85007

Re: Mined Land Reclamation Plan
Buckeye Mine, Maricopa County, Arizona

Dear Mr. Marsh:

In a letter dated October 30, 2024, ASMI indicated that the Reclamation Plan for the Buckeye Mine is Technically Incomplete. This letter presents responses to the October 30th letter. Premier Materials Group Buckeye (PMG) was assisted by Axelrod, Inc. in preparing the responses.

Items identified in the letter that need to be addressed are presented below. The item is reproduced in italics followed by the response. The Reclamation Plan (Plan) has been updated in accordance with the responses and is transmitted with this letter.

1. *A.R.S. §27-1271(B) (7) requires a narrative description of roads that are proposed for the aggregate mining unit.*

The narrative description of the roads below is presented in, Section 4.0 paragraph 5 of the Plan.

Haul roads will be constructed primarily in the plant area on the south side of the pit as shown on Figure 3. Existing roads around the west and south sides of the site will also be used as the pit expands to its ultimate layout. Temporary haul roads will be constructed internal to the ultimate pit limits as necessary to provide access to all working faces, with connections to the crushing site, screening site, material stockpiles, laydown areas and a water station. Haul roads will generally be 60 to 80 feet wide, inclusive of safety berms, and will support the traffic of haul trucks.

2. *A.R.S. §27-1271(8) (8) requires a map of the aggregate mining until area showing each surface disturbance. For previously undisturbed areas, the map shall identify any types of fish or wildlife habitats that will be disturbed.*

A map showing each surface disturbance and a table of the areas are presented on Figure 3. The table is also included in Section 4.3 of the Plan.

From PMG there was a former sand and gravel operation on the site and from available information most of the site was previously disturbed. The previously undisturbed area (approximate) is also shown on Figure 3.

There is no fish habitat within the previously undisturbed area as it is located outside the Gila River channel. The types of wildlife that could be disturbed are typically mule deer, javelina, squirrels, coyote, raccoons, rabbits, bobcats, snakes, lizards and tortoises and many types of birds including riparian and desert varieties, raptors, egrets, herons, doves, bitterns, kestrels, sparrows, cuckoos and waterfowl.

3. *A.R.S. §27-1271(B) (10) requires a proposed tentative schedule for beginning surface disturbances and beginning and completing the reclamation measures.*

Tentative schedules for beginning surface disturbances and beginning and completing reclamation measures are noted below and in Section 4.0 paragraph 4 and Section 6 paragraphs 1 and 2 of the Plan.

Section 4.0 paragraph 4: Surface disturbances, consisting of clearing and removal of vegetation and topsoil from the pit and plant area, started in mid-2024 followed by initial mining and processing of sand and gravel.

Section 6 paragraphs 1 and 2: The reclamation of the Buckeye Pit will take place during operations after an area is mined out. Final reclamation will take place after operations and production cease. As outlined in this Plan, mining activities and rock production will continue at Buckeye Pit for the next 10 years.

The final reclamation measures will be completed within six months of the cessation of mining and material production. Equipment and buildings will be removed within 90 days. PMG (or its reclamation contractor) will monitor reclamation quarterly for the first three years and take remedial actions that might be needed.

4. *A.R.S. §27-1271(8) (13) requires a statement that the owner or operator has provided a notice of the proposed reclamation plan to each residential property owner whose property is located within a one-half mile radius of the aggregate mining operation. The notice shall include the name and contact information of the owner or operator's designated representative who will respond to questions regarding the proposed reclamation plan. The notice should not list the Arizona State Mine Inspector as the contact. Please include the required statement in the narrative of the reclamation plan.*

The statement that the owner has provided notice to residential property owners is noted below and in Section 4.0 paragraph 2 of the Plan.

A letter has been sent to each residential property owner located within one half mile of the Site as shown on the current property tax roll, informing them of the mining operation and that they may request a copy of this plan. The letter was sent on September 18, 2024 more than fifteen days before submittal of this plan. The letter and names of property owners are included in Appendix C.

Sincerely

A handwritten signature in black ink, appearing to read "Todd Hall". The signature is written in a cursive style with a large, stylized initial "T".

Todd Hall
Manager

cc: P. Axelrod, P.E., Axelrod, Inc.

Enclosure: Buckeye Mine Reclamation Plan, Revision 2