



HALEY & ALDRICH, INC.
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400 E. Van Buren St., Suite 545
Phoenix, AZ 85004
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3 May 2021
File No. 130966-005

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

Attention: Joe Hart
Arizona State Mine Inspector

Subject: Response to Comments on the Technically Incomplete Reclamation Plan
for Hanson Aggregates Arizona, LLC – Clarkdale Operations

Dear Mr. Hart:

Hanson Aggregates Arizona, LLC (Hanson) and Haley & Aldrich, Inc. (Haley & Aldrich) have reviewed the comments from the Arizona State Mine Inspector (ASMI) correspondence dated 8 April 2021 regarding the technically incomplete notification for the Reclamation Plan for the Hanson Clarkdale Operations located in Yavapai County, Arizona (Attachment A). The following presents Hanson's response to ASMI request for missing information.

Comment 1:

Section 1 – Introduction: *There are two errors when stating the number of site parcels. The second paragraph states there are two parcels owned by Verde Exploration, but then lists three parcels. Later in the paragraph, there is a statement indicating that collectively there are three parcels, when it should state there are four parcels.*

Please correct the numbers of parcels stated in this section.

Response to Comment 1:

The correction to the text has been made in the Introduction. A revised sheet for the plan is included in Attachment B.

Comment 2:

Section 2.3, Table 1 – Property Acreage Use: *The table lists fewer acres for the Property Disturbed Area (242 acres) than for the Mining Area (245 acres). The Property Disturbed Area description mentions both*

Arizona State Mine Inspector

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the mining area and the plant area, so why is it similar in size to just the mining area? Is this because the setback area mentioned in the description has been subtracted from the total, or is it some other reason?

Please clarify the descriptions to indicate why the total Property Disturbed Area is less than the Mining Area, and does not appear to include the Plant Area.

Response to Comment 2:

Table 1 was corrected to indicate that the Property Disturbed Area of 280 acres matches the Property Boundary Area of 280 acres.

A revised sheet that includes the revised Table 1 for the plan is included in Attachment B.

Please feel free to contact the undersigned if you have any questions or require additional information.

Sincerely yours,
HALEY & ALDRICH, INC.



Rich Brown, R.G.
Geologist – Client Specialist



Eric J. Mears, R.G.
Mining Market Segment Leader

Enclosures:

Attachment A – Technically Incomplete Reclamation Plan for Hanson Aggregates Arizona, LLC –
Clarkdale Operations Letter dated 8 April 2021

Attachment B – Revised Sheets to Supplement the Reclamation Plan Significant Amendment

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ATTACHMENT A

**Technically Incomplete Reclamation Plan for Hanson Aggregates Arizona, LLC –
Clarkdale Operations Letter dated 8 April 2021**

Arizona State Mine Inspector



JOE HART

1700 W. Washington Suite 403
Phoenix, Arizona 85007-2805
(602) 542-5971
Fax (602) 542-5335



April 8, 2021

Hanson Aggregates Arizona, LLC
Attention: Land Manager
4025 South McClintock Drive, Suite 202
Tempe, Arizona 85282

Re: Technically Incomplete Reclamation & Closure Plan for Hanson Aggregates, LLC –
Clarkdale Operations

Dear Land Manager:

On February 17, 2021, the State Mine Inspector Agency received the Aggregate Mined Land Reclamation Plan Amendment from Hanson Aggregates, LLC for the Clarkdale Operations, which was found to be administratively complete. Mining operations for the Clarkdale Operations occur on parcels 401-05-004C and 401-05-004G, and portions of parcels 401-05-004F and 401-03-010F. The operations are located approximately two miles west of Clarkdale on Cement Plant Road in Yavapai County, Arizona.

On March 5, 2021, the amendments were found to be substantial changes. On April 5, 2021, this office received the following information from our consultant reviewing your plan. In accordance with A.R.S. §§ 27-1272, 27-1273, this letter is to notify you the plans have been found ***Technically Incomplete***.

The following items need to be addressed:

Section 1 - Introduction: There are two errors when stating the number of site parcels. The second paragraph states there are two parcels owned by Verde Exploration, but then lists three parcels. Later in the paragraph, there is a statement indicating that collectively there are three parcels, when it should state there are four parcels.

Please correct the numbers of parcels stated in this section.

Section 2.3, Table 1 – Property Acreage Use: The table lists fewer acres for the Property Disturbed Area (242 acres) than for the Mining Area (245 acres). The Property Disturbed Area description mentions both the mining area and the plant area, so why is it similar in size to just the mining area? Is this because the

setback area mentioned in the description has been subtracted from the total, or is it some other reason?

Please clarify the descriptions to indicate why the total Property Disturbed Area is less than the Mining Area, and does not appear to include the Plant Area.

Please supply the additional information within 90 days. If you have any questions concerning this determination, please contact Amanda Lothner at (602) 542-5971.

Sincerely,



Joe Hart
Arizona State Mine Inspector



1700 W. Washington Suite 403
Phoenix, Arizona 85007-2805
(602) 542-5971
Fax (602) 542-5335



ATTACHMENT B

Revised Sheets to Supplement the Reclamation Plan Significant Amendment

1. Introduction

This Aggregate Mined Land Reclamation Plan Amendment (Plan) details the closure and reclamation of the Clarkdale aggregate operations of Hanson Aggregates LLC (respectively, Hanson and Clarkdale Operations) located in Clarkdale, Arizona. Reclamation planning has been conducted in accordance with the Arizona Aggregate Mined Lands Reclamation Act (Arizona Revised Statutes [A.R.S.] § 27-1201) as authorized by A.R.S. § 27-1204. This amended 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.*). Figure 1 presents the facility location map of the Clarkdale Operations.

The Project Boundary Area in the 2006 Arizona State Mine Inspector (ASMI)-approved Plan¹ (2006 Plan) for the Clarkdale Operations is approximately 207 acres. This amendment will expand the project boundary to approximately 280 acres. The Clarkdale Operations consists of three parcels owned by Verde Exploration, Ltd., currently assigned Yavapai County Assessor's Parcel number 401-03-010F, 401-05-004F, and 401-05-004G (respectively, Verde and Verde Parcels) and one parcel owned by Hanson Aggregates LLC (Hanson); this parcel is currently assigned Yavapai County Assessor's Parcel number 401-05-004C (Hanson Parcel). Only a portion of parcels 401-03-010F and 401-05-004F are currently included in this Plan and the Clarkdale Operations. Collectively, the four parcels are the "Parcels." All the parcels are operated by Hanson under established mining leases with Verde.

¹ Reclamation Plan, 2006. – Hanson Aggregates Arizona, Inc., Clarkdale Operation

- Sanitary facilities provided by on-site septic systems; and
 - Solid waste disposal provided by contract waste removal services.
- Numerous aggregate stockpiles are present in the Plant Area, with an average slope at the angle of repose or approximately 1.5 horizontal to 1 vertical (1.5H:1V).

Within the Mining Area, all existing or proposed aggregate excavation will occur within the parcels owned by Verde. Reclamation of the existing mining areas on the east and northeast side of an unnamed drainage delineated on Figure 2 where material is no longer being mined and reclamation has begun in accordance with the 2006 Plan. No processing of material occurs within the Mining Areas. Operations consist of digging and hauling of material from the Mining Area to the Plant Area for processing. Hanson uses water from the on-site water wells for material washing and dust control throughout the entire site.

Current access is provided by Cement Plant Road, a paved road located east of the site. A primary off-highway access road is maintained from the entrance to the office and shop areas located in the northeast portion of the property. Other off-highway and haul roads provide access to the open pit, overburden stockpiles, processing plants, process material stockpiles, and the maintenance shop. The haul roads within the Mining Area may change configuration frequently as the mining operations continue.

Table 1 presents the current status of property acreage.

Table 1. Property Acreage Use		
Area Description	Description	Acres
Project Boundary Area	Area within the property boundary line includes the previously approved 207-acre area plus the additional approximate 73 acres.	280
Property Disturbed Area	Total area of property to be disturbed by mining and processing activities as depicted on the Existing Site Conditions Map (Figure 2). The setback areas will not be disturbed by mining or processing activities.	280
Mining Area	Total area includes the existing 148 acres of disturbance and the additional Mining Area (97 acres) to be added through this amendment to the reclamation plan.	245
Plant Area	Portion of the property largely covered by previously approved reclamation plan presently occupied by office and shop activities, concrete production, materials processing areas, ponds, and storage of materials.	35

2.3.1 Surrounding Area Land Use

The site is located in an area of predominantly open space and mining/industrial activities. Surrounding land uses generally consist of:

- Open space occurs on the east, south, and west sides of the property; and
- Industrial facilities and mining are located directly north of the site.

The planned post aggregate mining uses of naturalized open space for the Mining Area and light industrial for the Plant Area are consistent with surrounding land uses. However, after reclamation in