

Kirkland Mining Company
9494 East Chuckwagon Lane
Scottsdale, Arizona 85262

June 1, 2017

Submitted via email

Ms. Shelby Cave
U.S.D.I Bureau of Land Management
Phoenix District, Hassayampa Field Office
21605 North 7th Avenue
Phoenix, Arizona 85027

Re: Kirkland High Quality Pozzolan Mine
Revised Mining and Reclamation
Plan of Operations
AZA 37212

Dear Ms. Cave:

In response to Bureau of Land Management (BLM) comments, Kirkland Mining Company (KMC) has revised their draft mining and reclamation plan (MRPO) for development of the Kirkland High Quality Pozzolan (HQP) Mine located within Capital Association Placer Mining Claim encompassing the southwest quarter of Section 28, Township 13 North, Range 4 West, G&SRM, Yavapai County, Arizona. With this letter, KMC submits to the BLM the following:

1. Kirkland High Quality Pozzolan Mine, Draft Mining and Reclamation Plan of Operations, Revised June 1, 2017 (PDF Version in Redline/Strikethrough format)
2. Kirkland High Quality Pozzolan Mine, Draft Mining and Reclamation Plan of Operations, Revised June 1, 2017 (Full PDF Version, no tracked changes)
3. Kirkland Mining Company Responses to BLM Comments (Comment Matrix)

KMC responses to BLM comments provided in their completeness review letter are provided in the table, below.

KMC Responses to BLM Comments Provided in Their Transmittal Letter

BLM Comment	KMC Response
1 Modification of Section 4.9 Fire Safety and General Safety to include a discussion of whether a fence or similar barrier is required around the open pit mine for the safety of pedestrian traffic, vehicular traffic, livestock, and wildlife, and to be compliant with MHSA regulations related to open holes, and state regulations related to active mines.	Mine access will be gated and signed. Active mining operations will be fenced to prevent access. Section 4.9 (Fire Safety and General Safety) has been revised accordingly.

<p>2 Modification of Section 4.9 Fire Safety and General Safety to include documentation of completed or anticipated coordination with local authorities to include protocols for after hours access and safety orientation for first responders related to fire safety and public safety on Site.</p>	<p>KMC will coordinate with local law enforcement and fire departments to provide 24-hour access as needed for emergency response. Section 4.9 (Fire Safety and General Safety) has been revised accordingly.</p>
<p>3 Modification of Section 2.3.5 Transportation Plan to include documentation of communication with Arizona Department of Transportation about public safety related to entry point of mine traffic on State Route 89.</p>	<p>The proposed mine is accessed from Iron Springs Road, which is a currently a county maintained road. It is KMC's understanding that there is some potential for this road's jurisdiction to be transferred to ADOT. KMC has reached out to the Yavapai County Public Works Department and ADOT to determine any requirements for the management of ingress and egress associated with the mine operations. Appropriate signage will be posted based on the requirements of either the County or ADOT.</p> <p>No road modifications or improvements are anticipated to be required to support haulage of HQP on existing county, State, or Federal roadways.</p>
<p>4 Modification of Section 4.5 Air Quality to include at least annual monitoring for airborne carcinogens, specifically bulk geochemical testing of product as well as in-situ testing of exposed layers in pit as pit depth progress for asbestos minerals and erionite.</p>	<p>KMC understands that a General Permit would be required from the Air Quality Division of ADEQ. KMC will provide annual air monitoring in accordance with federal and state regulations and to meet the following objectives of 43 CFR 3809.401(b):</p> <ol style="list-style-type: none"> 1. to demonstrate compliance with an approved plan and other Federal or state environmental laws and regulations; 2. to provide early detection of potential problems; and 3. to supply information that will assist in directing corrective actions should they become necessary. <p>KMC will provide annual monitoring for airborne carcinogens if such monitoring is warranted.</p> <p>Section 4.5 (Air Quality) has been revised accordingly.</p>

<p>5 Modification of Section 2.3.1 Water Management plan to include documentation of private well ownership and associated use agreements with KMC, or information on any wells that may be needed on BLM managed lands.</p>	<p>Water for dust control would be obtained from an existing well on KMC's private parcel approximately 800 feet from the planned mining operations (ADWR Well #55-505179). The well registry dated May 13, 2015 and owned by KMC, reports this well has an intended capacity of 35 gpm. It has been calculated that a capacity of 20 gpm would provide adequate water for KMC daily operations. A contingency plan for additional water, if needed, is being developed where KMC would either use an existing local contractor for water delivery or explore for additional potential wells on privately owned lands. This clarification is provided in Sections 2.2.4 (Utilities) and 2.3.1 (Water Management Plan).</p>
<p>6 Modification of Section 2.1.3. Vegetation and Wildlife to include an occurrence table for migratory birds with potential to occur in the, and occurrence table for Arizona State Species of Conservation Concern.</p>	<p>KMC understands that discussion of the potential for occurrence of migratory birds and Arizona State Species of Conservation Concern is required as part of the Environmental Assessment (EA). This analysis will be included in the EA.</p>
<p>7 Modification of Section 2.2.1.2. Full Production Activities to include clarification of anticipated time frame for construction of off-site facility in order for BLM to assess if it is a connected action for NEPA analysis.</p>	<p>KMC is exploring the feasibility and potential locations for a secondary processing facility to begin processing HQP to a finer size. This facility would be placed on privately owned lands and is not considered to be a reasonably foreseeable activity associated with this Plan. This clarification has been made in Section 2.2.1.2 (Full Production Activities).</p>
<p>8 Modification of Section 2.2.1 Mine Production to include slope stability monitoring.</p>	<p>Slope stability monitoring will be conducted in accordance with MSHA regulations. Please see revision to Section 2.2.1.2 (Full Production Activities) and Section 5 (Monitoring Plan).</p>
<p>9 Modification of Section 2.2.1.2. Full Production Activities to include clarification of any anticipated seasonal or annual hour limits on night-time production, otherwise the MPO will be analyzed for 24-hour production.</p>	<p>Mining operations would occur year-round 40 to 80 hours a week during daylight hours as stated in Section 2.2.1.2 (Full Production Activities). Section 2.4 (Schedule of Operations) has been revised to remove the following statement: "However, if economic conditions are suitable, mine operations may extend periodically to operate 24-hours a day." KMC does not plan to operate outside daylight hours.</p>

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If you have any questions or require additional information, please do not hesitate to call.

Respectfully,

Amanda L. Best / on behalf of

Areta Zouvas
President
Kirkland Mining Company

Attachments: Kirkland High Quality Pozzolan Mine, Draft Mining and Reclamation Plan of Operations,
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Kirkland High Quality Pozzolan Mine, Draft Mining and Reclamation Plan of Operations,
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Kirkland Mining Company Responses to BLM Comments (Comment Matrix)

cc: Brian Buttazoni, BLM
Al Burch, Burch Consulting Services, LLC
Amanda Best, WestLand Resources, Inc.