

RECLAMATION PLAN

Dated August 1, 2025

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RP.1.0 INTRODUCTION

American Colloid Company is submitting the Sims application to the Wyoming Department of Environmental Quality's Land Quality Division to Amend lands into PT0322 in the Sims area, Update lands currently within PT0322 in the Sims area, and to consolidate all permitting actions that have occurred in the Sims Area. The Sims Consolidation Area includes a total of 1,019.33 acres in portions of Sections 26, 35, and 36 of Township 58 North Range 96 West, and Section 31 of Township 58 North Range 95 West. In addition to the Amendment lands, these lands include previously permitted and updated lands and have been inactive since the mid 1990's. The current Sims project proposes to Amend 330.00 acres into PT0322 and Update 409.33 acres. All lands being amended into PT0322 with this action are federal. The update lands consist of 49.33 acres of private lands and 360.00 acres of lands where the State of Wyoming maintains mineral ownership and the BLM owns the surface rights. Total proposed disturbance for the Sims Amendment/Update is 299.114 acres. Historical Changes to PT0322 in the Sims Consolidation area include Change 1 (original Sims amendment), Change 4 (Sims Update – Wyo-Ben), Change 5 (Sims Update – ACC), Change 8 (Sims Update – Wyo-Ben), Change 11 (Sims Update – Wyo-Ben), Change 13 (Sims Update – Wyo-Ben), and an unnumbered change (Sims Update – Wyo-Ben). Mining and Reclamation activities approved by the historical Changes listed above have been completed.

This area is located approximately 8.5 miles north of Lovell, Wyoming and approximately eight miles northwest of ACC's Lovell Plant. To see complete legal descriptions and the actions described above, please refer to the Introduction section of this application.

RP.1.1. Permitting History and Current Actions

American Colloid Company has mined bentonite in the Sims area since approximately 1977. As discussed in the Introduction of this application, six pre-1981 permitting Changes have occurred in the area and one action is proposed in this submittal (Sims Update/Amendment). Please see Map MP.2 for the current status of lands with disturbance related to previous mining activities. Once this application is approved, this Reclamation Plan will supersede all previous Reclamation Plans that have been approved in the Sims area. The reclamation plans historically approved in the area are summarized below.

RP.1.1.1. Change Number 4 (White Acres 9, Blue Wash, Bischoff, Sims)

Change Number 4 to PT0322 consisted of updates to three properties. These included White Acres 9, Bischoff, and Blue Wash. Also included in this Change was an Update to portions of the Sims School Section for clay awarded to Wyo-Ben Inc. as a result of a trespass settlement. Please see the Introduction section of this application for additional information regarding the specific parcels in the Sims School Section updated by this Change. The current proposed Sims Update/Amendment area includes lands updated by Change 4. The Mine Plan for this submittal included original pages 39 through 43 and two maps. Mining and reclamation activities approved by Change 4 have been completed.

RP.1.1.2. Change Number 5 (Andy May, Joy 4, Pak, White Rock, Sims)

Change Number 5 to PT0322 was approved May 17, 1985 and consisted of Updates to five properties. These included Andy May, Joy 4, Pak, White Rock, and Sims. This application

includes information from the Sims portion of that submittal. Please see the Introduction section of this application for additional information regarding the location of this property. The current proposed Sims Update/Amendment proposes to affect the southern portion of the lands updated in Change 5 in the Sims area (SE4 Section 36 Township 58 North Range 96 West). The reclamation plan included six pages (Pages RP-1 through RP-) dated 11/1/84. All mining and reclamation activities approved in Change 5 have been completed.

RP.1.1.3. Change Number 8 (Lewis-Weathersbee, Sims, L-17-77, Pete, Threshing Machine)

Change Number 8 to PT0322 was approved April 6, 1987 and consisted of Updates to five properties. These included Lewis-Weathersbee, Sims, L-17-77, Pete, and Threshing Machine. This application includes information from the Sims portion of that submittal. Please see the Introduction section of this application for additional information regarding the location of this property. The portion of the Sims area that was updated in Change 8 is not included in the current Sims Update/Amendment. The reclamation plan included nine pages (Pages RP-1 through RP-9). All mining and reclamation activities approved in Change 8 have been completed.

RP.1.1.4. Change Number 11 (Sims Update)

Change Number 11 to PT0322 was approved on September 6, 1990 and consisted of an Update to 80 acres in the Sims School Section by Wyo-Ben Inc. as a result of clay awarded to Wyo-Ben Inc. in the trespass agreement. Please see the Introduction section of this application for complete information regarding the location and status of this property. This action increased the disturbance acreage approved in Change 4. The reclamation plan submitted by Wyo-Ben, Inc, for Change 11 consisted of one page (Page 25). All mining and reclamation activities approved by Change 11 have been completed.

RP.1.1.5. Change Number 13 (Sims Update)

Change Number 13 to PT0322 was approved August 27, 1991 and consisted of an Update to the Sims School Section by Wyo-Ben Inc. as a result of clay awarded to Wyo-Ben Inc. in the trespass agreement. Please see the Introduction section of this application for complete information regarding the location and status of this property. This action increased the disturbance acreage approved in Changes 4 and 8. The reclamation plan submitted by Wyo-Ben, Inc. consisted of one page (Page 21). All mining and reclamation activities approved by Change 13 have been completed.

RP.1.1.6. Unnumbered Change to PT0321 (Sims Update)

Wyo-Ben Inc. submitted a request to Update 20 acres of lands within PT0322 on the Sims School Section that was approved on January 19, 1996. This Update was not assigned a formal Change number. This action added lands to the disturbance area to aid in reclamation of lands on the Sims School Section. Please see the Introduction section of this application for complete legal descriptions and status of lands included in this Update. The submittal consisted of a five-page letter and map to Jack Smith of LQD. All mining and reclamation approved by this unnumbered change have been completed.

RP.1.1.7. Sims Project area (Update/Amendment)

The Sims project area consists of 739.33 acres of federal and private lands. The project is part of the Sims consolidation area and is located in portions of Section 31, T58N R95W and Sections 26, 35, and 36 of T58N R96W. Please see the Introduction section of this application for complete legal descriptions of lands included in the Sims Amendment/Update area. The following reclamation plan only includes proposed mining for the Sims project area in the current submittal. Please note that Section 36 consists of split estate lands; the State of Wyoming maintains mineral ownership and the BLM holds the surface rights. ACC will maintain the proposed ROW WYWY-106743935 with the BLM for areas where 3809 does not apply.

RP.1.2. Post-mining land uses

Lands in the Sims area affected by mining operations will be reclaimed to the pre-mine land uses of wildlife habitat, livestock grazing, and recreation.

RP.2.0 CONTOURING PLAN FOR AFFECTED LANDS

Rubber-tired scrapers will backfill open pits in a backcast system as outlined in the Mine Plan. As the pits are backfilled, they will be contoured and blended to surrounding topography. Past experience has shown that the “swelling” (~30% on average) of the replaced overburden will compensate for the volume of the removed bentonite bed in many reclaimed pits. As such, the postmine topography of reclaimed pits closely resembles premine conditions. Efforts will be made to ensure that reclaimed slopes will not be steeper than 3:1 to provide stabilization against wind and water erosion. However, there may be situations when steeper slopes are required to properly blend reclaimed land into adjacent topography; these areas may require special erosion control practices that are described in the Mine Plan. Through drainage will be restored in all areas.

Due to factors such as terrain and economics, out-of-pit spoil (OOPS) piles are a necessary component of bentonite mining. Efforts are made to minimize the number of OOPS piles associated with mining.

In the Sims area, two permanent out-of-pit spoil piles are proposed, for the first cuts in the A and the E series. Please see Addendum RP.1 and Map RP.1 – Reclamation Plan for existing and predicted cross sections as well as predicted post-mine topography.

RP.3.0 SURFACE PREPARATION AND TOPSOIL AND/OR SUBSOIL REPLACEMENT

Topsoil and subsoil will be spread over all areas where it was salvaged during mining activities in preparation for reseeding. Soil resources are spread over the most suitable overburden available to ensure the development of a proper rooting zone. Please see the Mine Series Descriptions in the Mine Plan for information on the soil and overburden handling plans for each pit series. Areas where backfilled overburden is compacted due to multiple scraper passes will be ripped with a motor patrol prior to spreading soils. The soil will be replaced by equipment (typically rubber-tired scrapers) in at least two lifts in the reverse order of removal. Depending on its characteristics, the soil may then be disked in preparation for seeding or will be seeded immediately during the next seeding season.

The area has a number of natural and reclaimed badland areas that have been and will be affected by mining operations. Unless excess soil resources are available, no soil will be respread in these areas. Seeding will occur on badland areas that did have soil spread over them, and limited or no seeding will occur on badland areas that did not have soil spread over them. Areas without soil will be contoured into existing topography and bladed and/or harrowed to blend them back into adjacent native lands.

RP.4.0 REVEGETATION PRACTICES

Seeding will be done with a tractor pulling a broadcast seeder mounted on a chisel plow/furrower. This method leaves a moderately rough seedbed to capture and hold water and help protect against wind erosion. In areas where soil compaction is significant, such as soil stockpile locations where no soil salvage occurred (run-on), seeding will be preceded by ripping with a motor patrol. Ripping and seeding operations will be done along the contour or perpendicular to the prevailing winds whenever possible. Generally, seeding will take place between October 1st and mid-April. While late fall is the preferred planting season, weather conditions and the number of acres scheduled for seeding will largely dictate the actual time of seeding in any given year. Seeding will occur during the first fall/winter after topsoil has been replaced.

The seed mixes that will be used for reclamation are described in Addendum RP.2. Please see individual series descriptions in the Mine Plan for information on the seed mixes that will be used in each series. Changing market conditions and/or new vegetation species information may require adjustments to the seed mix at the time of actual seeding. As such, alternative species and rates are also listed in the event some substitutions need to be made. Any variation from the proposed mixes or listed substitutions must have approval from WDEQ/LQD and, where public lands are involved, the BLM (or the BOR, where applicable). ACC will occasionally plant a sterile cover crop on topsoiled lands prior to final seeding. If this occurs on federal lands, the CYFO of the BLM will be consulted prior to any seeding activities.

Occasionally ACC livespread soil in the late spring or early summer. In these months where application of native seed mixes would not be successful, ACC will seed these areas with a sterile cover crop, such as oats or barley. This application would occur prior to seeding with a native seed mix the following fall/winter. The Cody Field Office (CYFO) of the BLM would be consulted prior to planting a sterile cover crop on soils spread on federal lands.

Limited or no seeding will occur in select areas in which no soil has been replaced, such as areas previously mapped as badlands. The areas for which soil replacement is not required will be graded to blend in with the surrounding reclamation and native topography, and micro sites such as swales and depressions that are likely to accumulate moisture and support revegetation will be selected for seeding as appropriate. Targeted seeding methods will be utilized, and black greasewood, big sagebrush, or rabbitbrush will be seeded at a rate of 1 pound of pure live seed (PLS) per acre in areas that were vegetated by these specific species prior to mining activities in order to recreate the diverse habitat that previously existed in disturbed areas. If any surplus topsoil or other substitute suitable growth media is available for respread in areas that were not vegetated prior to mining activities, they may be targeted for black greasewood seeding. The CYFO of the BLM would be contacted and consulted with prior to seeding on federal lands on

areas that did not support these species prior to mining disturbance.

Reseeding or interseeding efforts will be considered after four consecutive years of evidence that the initial seeding attempt has failed. However, if significant erosion problems become evident due to lack of vegetation during the four-year evaluation period, efforts to stabilize the erosion, including reseeded, will commence as soon as field conditions allow.

RP.4.1. Protection of Seeded Land

At the time an area is seeded, ACC will meet the intent of Chapter III, Section 2(d) (viii) by restricting livestock use of the land for at least two years after seeding. This will be accomplished by either fencing the reclaimed area or by reaching grazing agreements with holders of the allotments on public lands.

RP.4.2. Noxious Weeds

Noxious weed encroachment on reclaimed areas will be controlled within the parameters set forth in Chapter III, Section 2(d) (ix). If it is necessary to control noxious or invasive weeds on federally managed areas, a Pesticide Use Proposal (PUP) and written approval from the Authorized Officer (BLM Field Manager) will be obtained prior to any treatments. ACC will be responsible for preventing and managing all noxious and undesirable invading plant species in the disturbed areas, such as cheatgrass and any other invasive annual grass, whitetop, thistle, knapweed, Russian olive, and tamarisk. Certified noxious weed-free seed will be used to seed the area during reclamation. Any mulch will be certified weed free.

RP.4.3. Evaluation of Reclamation Success

Reclamation standards, per WDEQ/LQD Non-Coal Chapter III Rules and Regulations, will be met or exceeded to successfully achieve post-mining land uses. Achieving post-mining land uses will require that the reclaimed land consist of multiple, distinct vegetation community types that generally parallel, though are not necessarily identical to, the different community types found to be present prior to mining. The general success of reclaiming these communities will be evaluated through use of the extended reference area concept: The different reclaimed community types will be quantitatively and qualitatively compared individually to their associated community types as identified during baseline vegetation studies. The associated community types used for comparison should be located on undisturbed, native land in the vicinity of the reclaimed land. Baseline data (photographs, mapping, and other data) will assist with this comparison. Specific methodology for comparing and evaluating reclamation success will follow the standards mutually agreed upon by ACC, WDEQ/LQD, the BLM, and any other relevant landowners on a case-by-case basis at the time of final bond release.

RP.5.0 FINAL HYDROLOGIC RESTORATION

Reclamation operations will include removal of any temporary diversions and re-establishment of ephemeral drainages. Reconstruction of the drainages will be accomplished by using scrapers or graders to construct flat-bottomed swales that meander as much as practical and are at least as long as the native channels. Where possible and appropriate, the bottom of the replaced channel will be located on the reclaimed pit floors to mimic pre-existing bedrock conditions. The average slope may also be reduced further by placing water bars in the channel to encourage meandering. Reclaimed channels will be feathered to tie into native channels in order to ensure

the transition zone remains stable. Please refer to Appendix D-6 Hydrology for final hydrologic restoration details.

Mining in the Sims Update/Amendment area will occur through a surface water right that does hold water in the spring and summer months. The water right holder uses it as a water source for livestock. ACC proposes to mine through this stock pond and associated drainage during the dry fall/winter months. ACC will reconstruct the pond and the drainage prior to spring runoff to in approximately the same location with the permitted capacity. The surface water right owner has agreed to this proposed activity. Please see the correspondence section of this submittal for a copy of the signed agreement.

RP.6.0 SPECIAL RECLAMATION STANDARDS

RP.6.1. Roads

Any new haul roads constructed during the mining of these properties will be reclaimed to their original condition. Reclamation of roads will include removal of culverts, fills, and surfacing materials, and grading to blend with native topography. Compacted areas will also be ripped with a motor patrol to decompact the roadbed prior to application of soil resources and seed.

In cases where in-pit haul roads are constructed, the areas adjacent to the road will be reclaimed, with enough soil resources retained to reclaim the road when the final pit is reached. Depending on bentonite resources and access on adjacent lands, these haul roads may continue to be used into the future and will not be reclaimed until there is no potential need for them.

RP.6.2. Facilities and Utilities

No buildings or structures will be constructed for this operation. No power lines or other utilities will be moved, re-routed, or constructed for this operation.

RP.6.3. Fences

Fencing is present along the eastern boundary of Section 36 separating the school section from Section 31. This fence is a grazing allotment boundary. A portion of this fence will be removed for this operation. ACC will construct temporary fencing for the allotment during mining and reclamation according to BLM wildlife-friendly standards. If necessary, ACC will install a gate or cattle guard across the in-pit haul road that will be created for access to the eastern portion of the project area. Upon completion of all mining and reclamation activities in Section 31, the fence will be reconstructed in its original location to BLM wildlife-friendly standards with the specified top three wires being barbed and the bottom wire being smooth and a minimum of 16 inches off the ground.

RP.7.0 RECLAMATION SCHEDULE

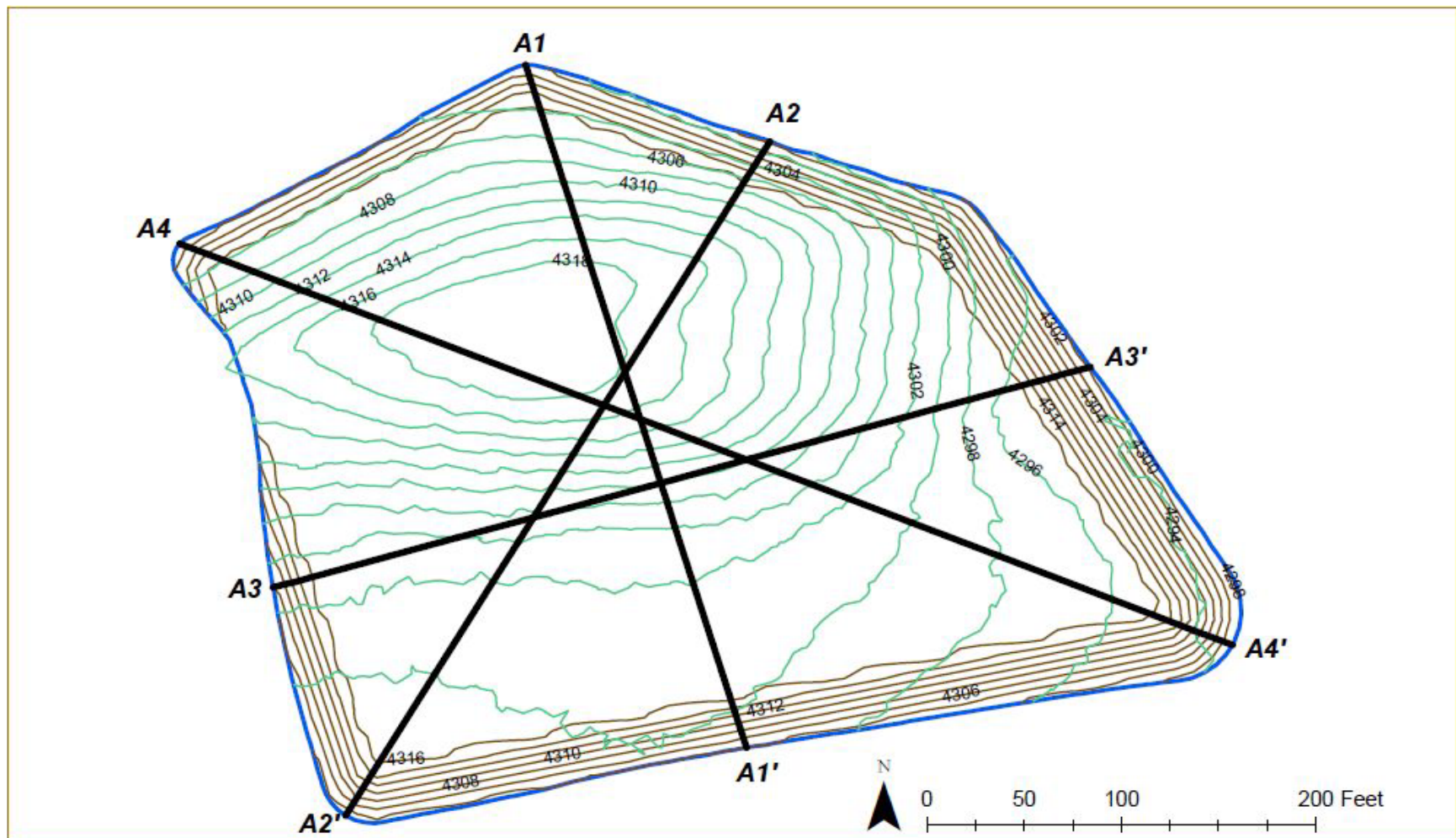
The Sims area will be mined with a continuous backfill operation, and reclamation will follow directly behind mining as described in the Mine Plan. Mining could commence upon approval and is estimated to be completed in roughly thirty years. The timing and locations of active mining vary by market demands for various clay qualities as well as weather conditions. The reclamation rate will generally be concurrent with the mining progression and will begin as soon as possible. Reclamation will generally be concurrent with the mining progression and will

begin as soon as possible. As such, the total mine footprint in the area is expected to remain relatively stable over time.

In general, the following schedule will be followed: Reclamation will begin within two years and be completed within four years of the date the lands were affected. If field drying operations are employed, reclamation will begin within three years and be completed within five years of the date the land is affected. However, under certain situations, this general schedule may not be followed: An out-of-pit haul road will be reclaimed within two years of the completion of mining in all series that the road is associated with unless the landowner requests that the road be made a permanent feature. An in-pit haul road will be reclaimed within two years of the completion of mining in all series that the road is associated with. A temporary out-of-pit spoil pile will be used for contouring and reclaiming the series it is associated with within two years of the completion of the associated series. Permanent out-of-pit spoil piles will be reclaimed within two years of the creation of the pile.

Addendum RP.1

Permanent Overburden Feature Cross Sections



- Cross Section Location
- Postmine Contour
- Premine Contour

OOPS Pile A

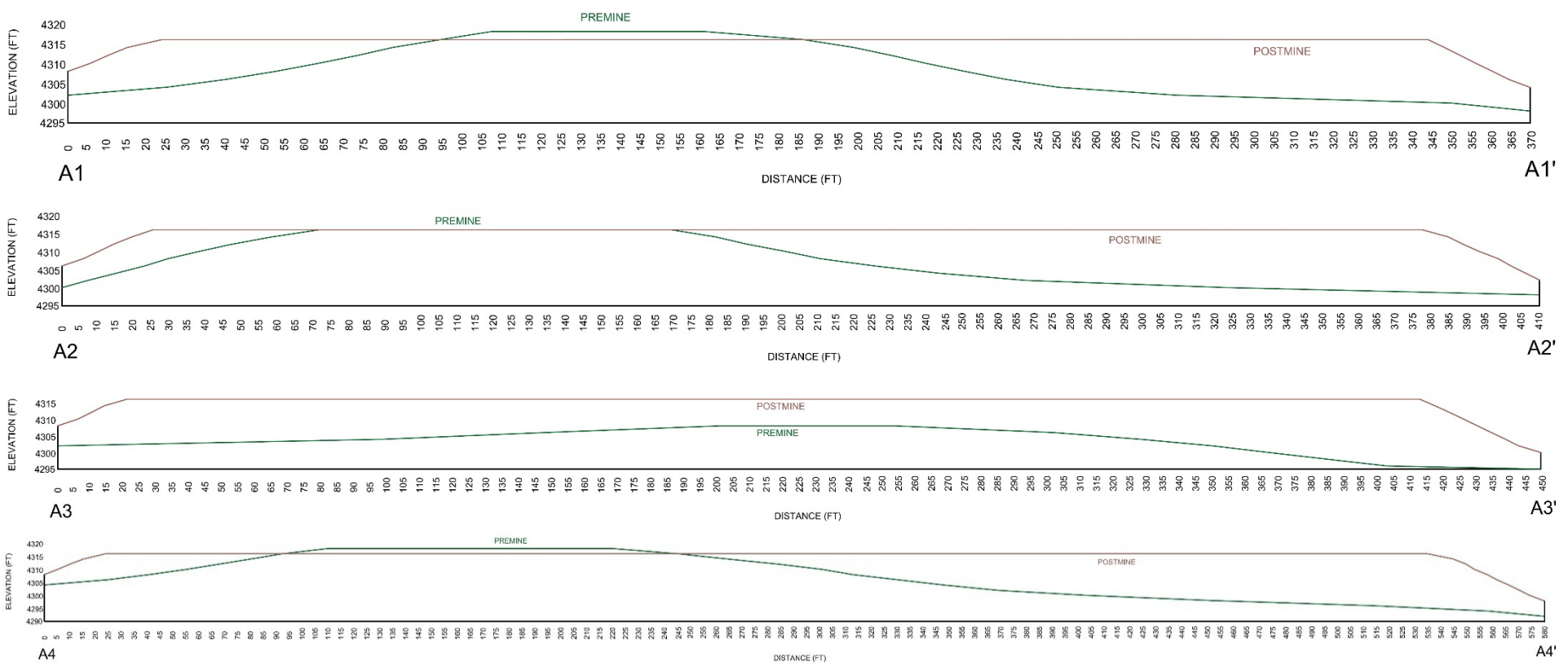
PT0322
Sims Area

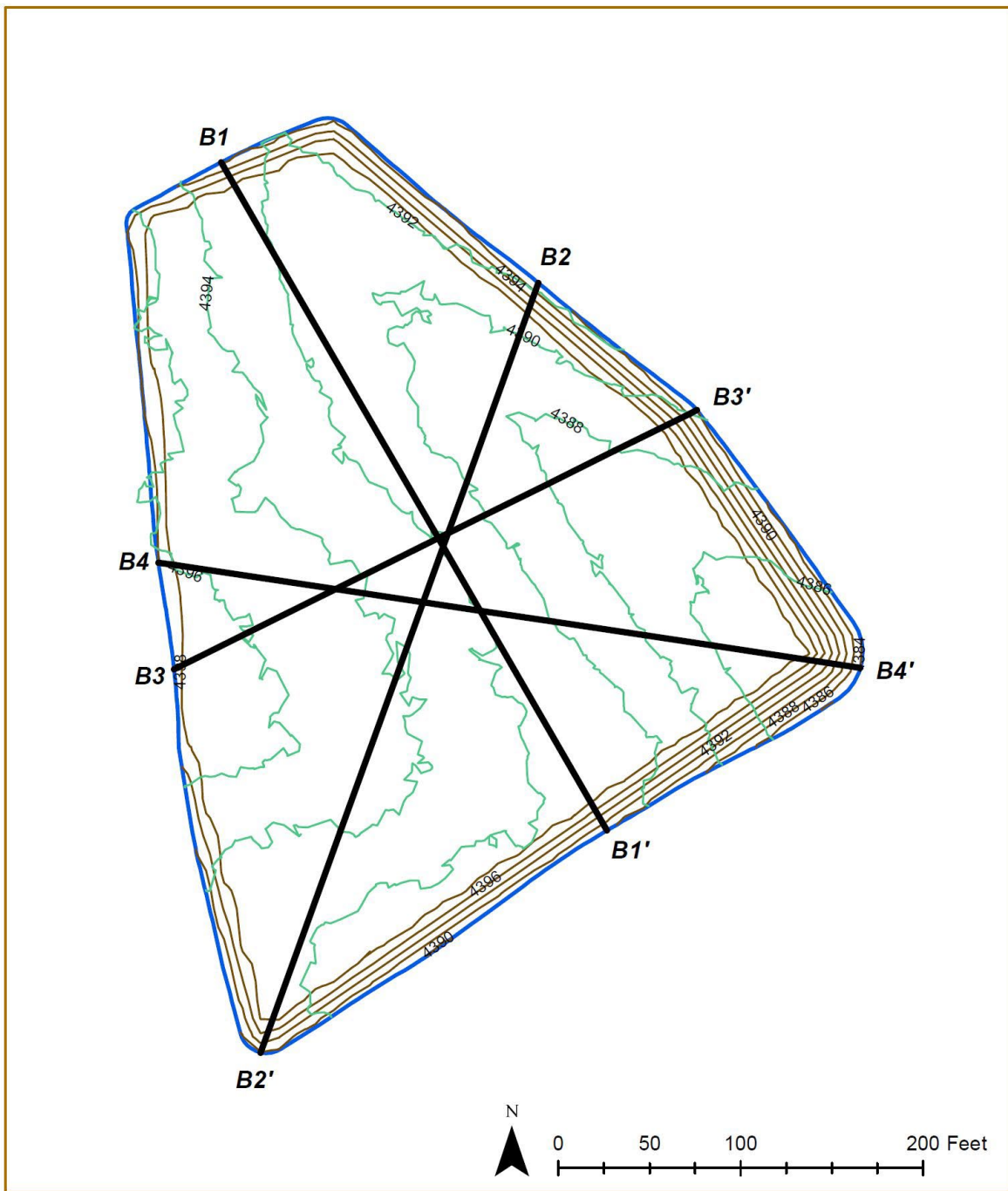
Scale: 1 inch = 80 feet

American Colloid Company
PO Box 428
Lovell, WY 82431

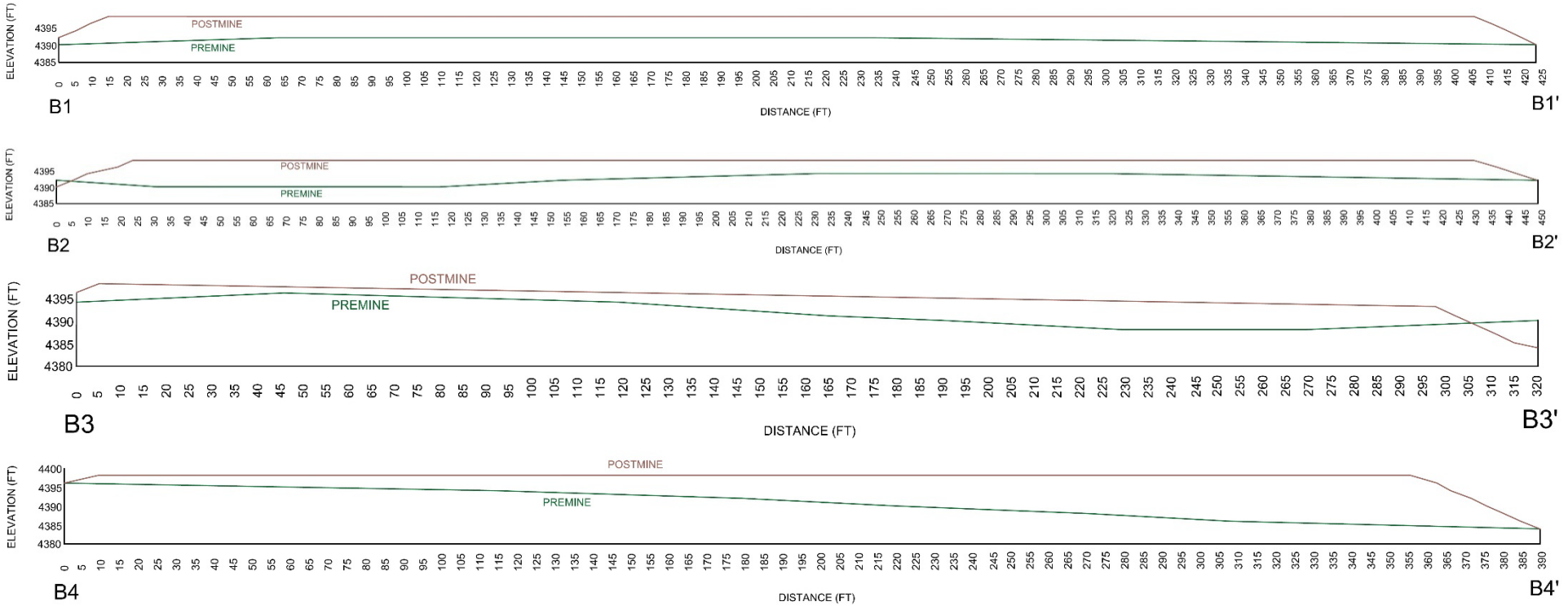
Author: MW
Date: 8/1/2025
Revised:
Map 1 of 1

Pre-mine and Post-mine Topography – OOPS Pile A





Pre-mine and Post-mine Topography – OOPS Pile B



Addendum RP.2
Reclamation Seed Mixes

Standard Seed Mix

Species	PLS lbs./acre	No. seeds per lb.	Seeds per sq. ft.	Percent of mix	
Grasses					This mix will be used where Gardner saltbush was dominant in the pre-mine vegetation communities.
Indian ricegrass	1.25	141,000	4	3%	
Bottlebrush squirreltail	3	192,000	13	9%	
Western wheatgrass	2	110,000	5	3%	
Sandberg bluegrass	1	1,047,000	24	16%	
Bluebunch wheatgrass	2	140,000	6	4%	
Sand dropseed	0.1	5,298,000	12	8%	Areas with topography particularly prone to catch and hold moisture may be targeted with 1 PLS lb./acre big sagebrush seeded separately to reestablish sagebrush inclusions present in pre-mine vegetation communities.
43%					
Shrubs					
Fringed sagebrush	0.5	4,536,000	52	35%	
Fourwing saltbush	4	52,000	5	3%	
Shadscale	2	64,900	3	2%	
Gardner saltbush	4	111,500	10	7%	
Rubber rabbitbrush	0.5	400,000	5	3%	
50%					
Forbs					
Rocky Mountain beeplant	0.5	65,900	1	1%	
Annual sunflower	1	58,500	1	1%	
Blue flax	0.5	293,000	3	2%	
Scarlet globemallow	0.5	500,000	6	4%	
7%					
Total PLS lbs./acre	22.85		151		

Alternate species if others are in short supply

Grasses				based on broadcast seeding. If drill methods are used the rate will be reduced by 30-40%.
Thickspike wheatgrass	2	154,000	7	
Slender wheatgrass	2	159,000	7	
Great Basin wildrye*	2	130,000	6	
Russian wildrye Bozoisky*	2	175,000	8	
Alkali sacaton	0.5	1,758,000	20	
Forbs				
Western yarrow	1	2,770,000	64	
Northern sweetvetch	0.5	46,000	1	
Desert parsley	0.5	45,000	1	
Yellow sweetclover*	0.5	260,000	3	
American vetch	1	33,000	1	
Shrubs				
Big sagebrush	1	2,500,000	57	
Winterfat	0.5	123,000	1	

**Only on private lands*

Big Sagebrush Seed Mix

Species	PLS lbs./acre	No. seeds per lb.	Seeds per sq. ft.	Percent of mix	
Grasses					This mix will be used where Wyoming big sagebrush was dominant in the pre-mine vegetation communities.
Bottlebrush squirreltail	2.5	192,000	11	6%	
Thickspike wheatgrass	1	154,000	4	2%	
Sandberg bluegrass	1	1,047,000	24	13%	
Bluebunch wheatgrass	1	140,000	3	2%	
Sand dropseed	0.1	5,298,000	12	6%	
					29%
Shrubs					Areas with topography particularly prone to catch and hold moisture will be targeted with this mix along with an extra 1 PLS lb./acre big sagebrush seeded separately.
Fringed sagebrush	0.5	4,536,000	52	28%	
Big sagebrush	1	2,500,000	57	30%	
Fourwing saltbush	3	52,000	4	2%	
Shadscale	2	64,900	3	2%	
Gardner saltbush	4	111,500	10	5%	
Winterfat	0.5	123,000	1	1%	
Forbs					
Rocky Mountain beeplant	0.5	65,900	1	0.4%	
Annual sunflower	0.5	58,500	1	0.4%	
Scarlet globemallow	0.5	500,000	6	3%	
American vetch	0.5	33,000	1	0.2%	
Total PLS lbs./acre	18.6		189		

Alternate species if others are in short supply				PLS seeding rate is based on broadcast seeding. If drill methods are used the rate will be reduced by 30-40% except for big sagebrush.
Grasses				
Indian ricegrass	1	141,000	3	
Streambank wheatgrass	1	156,000	4	
Slender wheatgrass	1	159,000	4	
Great Basin wildrye*	1	130,000	3	
Western wheatgrass	2	110,000	5	
Russian wildrye Bozoisky*	1	175,000	4	
Alkali sacaton	0.5	1,758,000	20	
Forbs				
Western yarrow	0.5	2,770,000	32	
Northern sweetvetch	0.5	46,000	1	
Blue flax	0.5	293,000	3	
Desert parsley	0.5	45,000	1	
Shrubs				
Rubber rabbitbrush	0.5	400,000	5	

**Only on private lands*