



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Phoenix District
Hassayampa Field Office
21605 North 7th Avenue
Phoenix, Arizona 85027
www.blm.gov/az/



In Reply Refer To:
3809 (P010)
AZA-36808

CERTIFIED MAIL - RETURN RECEIPT REQUESTED NO. 7015 1730 0000 9983 3567

Kirkland Mining Company
Attn: Areta Zouvas, President
9694 E. Chuckwagon Lane
Scottsdale, AZ 85262

43 CFR 3809
Surface Management
AZA-36808

MINING PLAN OF OPERATIONS COMPLETENESS REVIEW: PLAN NOT COMPLETE

The Kirkland Mining Company (KMC) Mining Plan of Operations (MPO) to conduct mining activities at T 13 N, R 4 W, southwest $\frac{1}{4}$ of Section 28 in Yavapai County near Kirkland Junction was received in this office April 18, 2017. The Plan of Operations has been assigned Bureau of Land Management (BLM) case file number AZA 37212. Please refer to this number in future correspondence concerning this operation.

Consistent with the surface management regulations at 43 CFR 3809.411(a), the BLM has reviewed the Plan to determine if it meets the content requirements at 43 CFR 3809.401(b). Please review the internal review comment matrix enclosed and provide a response or clarification for each resource specialist comment. Also, please resubmit the Kirkland Mine Company Mining Plan of Operations to the BLM Hassayampa Field Office with the following modifications or information:

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 MSHA regulations related to open holes, and state regulations related to active mines,
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,

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,
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,
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,
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,
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,
8. Modification of Section 2.2.1 Mine Production to include slope stability monitoring,
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.

If you have any questions concerning this decision, please contact Shelby Cave, Geologist, at 623-580-5639.


Rem Hawes
Field Manager