

**Response to Bureau of Land Management Comments:
Sloan Plan of Operations
Sloan Competitive Mineral Material Sales EIS**

**Prepared for:
U.S. Department of the Interior
Bureau of Land Management
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Submitted by:

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Response to Bureau of Land Management Comments: Sloan Plan of Operations Sloan Competitive Mineral Material Sales EIS

General:

This document describes three operating scenarios; SRP and CEMEX operating two independent construction aggregate producing facilities and the third option is a Joint operation with a single mine and plant. Each option will take 10 years to ramp up to full production. If SRP and CEMEX operate independently, each would produce five million tons per year at full production. The Joint operation would produce seven million tons per year.

The following responses to each numbered question will be listed as:

- a. SRP Mine Plan
- b. CEMEX Mine Plan
- c. Joint Mine Plan

1. Provide specific schedule from theoretical date of approval to mobilization, site preparation, outside permit applications and commencement of excavation activity.

Response:

- a. After date of project approval, mobilization and site preparation will take 7 to 12 months. Outside permit applications will take 12 months from date of project approval. The rugged terrain will require an additional 6 months of mine development after site preparation to commence excavation activity. The anticipated timeframe is therefore 18 to 24 months.
- b. Same as above
- c. Same as above

2. Provide anticipated haul direction and distance for procedures based on current economic outlook.

Response:

- a. Anticipated haul direction will be subject to market demand at the time but is anticipated to be approximately 85% to the north into the Las

Vegas / Henderson areas and 15% to the south. Haul distances will be from 1 to 40 miles from the Sloan site.

- b. Same as Above
 - c. Same as Above
3. Provide an estimate of the number of people that will be employed at the mine, including newly created positions, percentage of new employees to be hired locally, average wage rates(by position)that will be employed at site.

Response:

- a. The estimate of employees at the site will be from 20 to 30 people. These will be newly created positions at the site and attempts will be made to hire locally. The average wage rate will be approximately \$18.00 per hour. An estimated 10 to 15 contractors will be on site on an as needed basis.
 - b. Same as above
 - c. Same as above
4. Provide storm water management plan demonstrating that storm water flows during site preparation, excavation and at completion will not pose a threat to workers or equipment or create any offsite hazards

Response:

- a. The Project Site is located at the extreme southern boundary of the Las Vegas Valley. Steep mountain ridges trending south-east to north-west and shallow alluvial fans draining to the valley floors characterize the site. There are no perennial streams on the site. Surface waters occur on the site for only a limited time during and immediately after precipitation events. The Flood Control Master Plan (MPU) for the Las Vegas Valley by the Clark County Regional Flood Control District shows the site at the southern limit of the plan boundary.

The MPU shows that the project is in the Pittman Wash/C-1 Channel Watershed. The majority of the site drains towards I-15 in the D07 sub basin, while the remainder of the site drains to the G2 sub basin. The Hydrologic Criteria and Drainage Design Manual (HCDDM) for the Clark County Regional Flood Control recommends the use of the NOAA Atlas 2 precipitation maps with modifications to estimate point precipitation within the Valley. The 100 year, 6 hour point precipitation for the site is estimated at 3.15 inches. The 10 year, 6 hour point precipitation is estimated at 1.86 inches. These precipitation events will generate steeply peaked runoff hydrographs on the site, which produce relatively high runoff rates, but limited volumes.

The successful bidder will submit a Storm Water Management Plan. The SRP site has an east and west drainage course. Site plans will allow these drainage courses to flow with no impediments and all employee and equipment activities will be located at a safe distance from these Storm Water channels.

- b. Same as above except CEMEX has a south-east and north-west drainage course.
 - c. The Joint Storm Water Plan will have less impact as the drainage course in the NW ¼ of Section 32 will not be impacted.
5. Provide narrative addressing materials brought to the site, their uses, quantity and location to be stored and used.

Response:

- a. The main materials brought to the site include fuels, lubricants and maintenance supplies. Fuels and lubricants are stored in agency approved locations with required secondary containment (see locations on the Plant Layout). Maintenance supplies are stored in the equipment storage area depicted on the site plan. Other materials include dust control chemicals, safety and office supplies. Quantities depend on site production.
- b. Same as above.
- c. The Joint plan is more efficient as only one set of materials is required to be brought and stored on-site.

Site Access

6. Provide full dimension and anticipated use of access paths-trucks, POV's, water lines, electrical lines, other utilities.

Response:

- a. Site access alternatives were reviewed and two alternatives were developed which are shown on the "Access Exhibit" – Attachment 4. Alternative A was selected because it is the shortest direct course from the site to regional transportation connections along the Pyle Avenue alignment to Las Vegas Boulevard South. Alternative B is not only longer but relies on future City of Henderson and Nevada Department of Transportation planning and construction, which has an uncertain schedule and ambiguity as to alignments and other elements of design. All vehicle access (trucks, POV's) will be on roads shown on the site plans. Due to the rugged character of the site, all water, power and other utilities will access along the entry roads.
- b. Same
- c. The Joint plan requires only one access for vehicles and utilities.

Transportation Plan

7. Prepare a Transportation Plan for on-site, ingress and egress for the site. Include impacts to existing public transportation system (highways, etc.)

Response:

- a. The Access Road and Utility Alignment – Attachment 4 shows the on-site, ingress and egress to public transportation. Each truck transporting product carries a maximum of 42 tons. The SRP plan proposed a 5 million ton per year plant which would require approximately 160,020 truck trips per year assuming an average load of approximately 32 tons.
- b. CEMEX proposes a 5 million ton per year operation which would produce 160,020 truck trips per year.
- c. At a proposed full production of 7 million tons per year, that would require 224,280 truck trips per year. The benefit to the joint plan is the SRP plant-site would not be needed and the corresponding access road to the SRP site is not required.

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8. Coordinate with the Nevada Department of Transportation (NDOT), Regional Transportation Commission (RTC) and Clark County Department of Aviation (CCDOA).

Response:

- a. Contact was made with the following agencies and individuals to determine the preliminary access alternatives being considered:
 1. Nevada Department of Transportation – Mary Martini , District Engineer
 2. Clark County Regional Transportation Commission – Bruce Turner, Director of Planning and Martin James, Manager of Planning.
 3. Clark County Department of Aviation – Robert Tweedy, Manager of Development
 4. City of Henderson – Robert Herr, Asst. Director of Public Works and Paul Andricopulos, Planner.

Both proposed alternatives to access roadways were discussed with the obvious best route being Alternative A as shown on Attachment 4. Only one concern was noted, from the Clark County Department of Aviation (CCDA), that being the planned waterline along the southern boundary of a parcel owned by the CCDA at the northeast corner of Pyle Avenue and Las Vegas Boulevard South. The Pyle Avenue alignment is within Alternative A and coordination with the CCDA would be required for both pipeline and roadway construction. The successful bidder will coordinate with the above agencies to finalize details and requirements for use of Las Vegas Boulevard South and Interstate 15.

- b. Same as above
- c. Same as above

Daily Operation & Maintenance of Access Ways

9. Provide a specific schedule and methods for maintenance of access ways, including dust control, surfacing, safety (personnel, visitors, etc.), storm water flow path maintenance, restoration.

Response:

- a. All daily operation and maintenance personnel and equipment will access on site roads described in the site plan. Initial roads will be constructed of gravel with chemical and water dust suppression controls. When the site is in full operations, the access roads will be paved. A truck wheel cleaning system will be installed if necessary to minimize “track out”. All employees and contractors entering the property will be required to have site specific safety training. All other personnel entering the property will access the site the same way and

have site specific training or a qualified company escort. All access roads comply with the site Storm Water Plan. Drainage channels identified in the Storm Water Plan will be inspected as required in the SWP and maintained. All reclamation and restoration activities will access the property on the site roads. Most reclamation activities will occur in the mining area.

- b. Same as above
- c. The Joint plan will have significantly less access and mine roads to maintain than two separate operations running concurrently.

Operation Layout

10. Coordinate plant site layout with traffic patterns on site and review for consistency

Response:

- a. See the Plant Layout and Attachment 4. The site plan traffic pattern will comply with the site specific safety plan. A single two lane road provides access to the plant area and the plant site will have an established traffic pattern for loading, weighing and exiting. The traffic patterns will be reviewed periodically for consistency.
- b. Same as above
- c. Again, having a Joint plan reduces traffic pattern issues as compared to two separate operations running concurrently.

Stockpile Areas

11. Provide specific material stockpile areas (with maximum height & volume of material) for raw material, processed material, loading areas and waste materials

Response:

- a. See the Plant Layout for stockpile locations of raw materials, processed material and loading areas. Rock unsuitable for immediate product processing will be stockpiled and sold later for other uses. Stockpile dimensions are shown on the Plant Layout and Mine Plans. Maximum stockpile heights under those conveyors will be dictated by the conveyor equipment feeding them and could be up to 80 feet high. Other stockpiles will have their height determined by plant site requirements but will typically be less than 40 feet high. Product stockpiles are not expected to exceed 125,000 tons.
- b. Same as above
- c. The Joint plan has one set of stockpiles, which reduces environmental impacts as compared to two separate operations running concurrently.

Personnel Facilities

12. Provide specifics of restroom and amenities to be constructed, including location

Response:

A septic system generating less than 5,000 gallons per day requires a permit from Southern Nevada Health District (SNHD) and more than 5,000 gallons per day requires a Nevada Division of Environmental Protection permit. The proposal is for a 1,500 gallon septic tank to be installed and pumped on an as needed basis. Permitting and design of system will be through SNHD.

- a. Initial restroom facilities will be portable. Permanent restroom facilities for men and women will be located in the site office building (see plant site plan). A portable unit will be available in the mining area.
- b. Same as above
- c. Same as above

13. Provide specifics of proposed parking lot, including surface, size, location, # spaces etc.

Response:

- a. The standard commercial parking space is 9 X 21 feet. At Sloan, for employees, we will use 10 X 22 ft. to accommodate the large pickup trucks. The plant site plan shows 30 parking spaces for employees and visitors. The total size of the parking lot would be 22 X 300 feet or 6,600 ft². Heavy equipment parking is south of the truck shop. These spaces are 30 X 50 feet and there are 10 spaces provided, requiring a total of 50 X 300 feet or 15,000 ft². See the Plant Layout for parking area locations. The employee parking surface will be paved. Heavy equipment parking will be gravel.
- b. Same as above.
- c. Same as above. The Joint plan has one site parking area, not two as would be the case with two separate operations operating concurrently.

Equipment Operation, Fueling & Maintenance

14. Indicate the number and types of equipment that will be in operation during the daytime and nighttime hours of operation

Response:

- a. See the equipment list on Table 1, page 17. This equipment may be used up to 24 hours, day and night subject to market demand.

- b. See Table 1 page 17.
- c. Operating option “a” and “b” are each expected to require the equipment on Table 1 for each operation. The Joint operation uses one set of equipment.

15. Provide details regarding when, where, and how equipment fueling will occur.

Response:

- a. Equipment fueling operations are done at the fuel tank and with the service truck. Fueling may occur at anytime throughout the shift, dependant on operations requirements at the time but typically would occur at the end of the shift.
- b. Same as above
- c. Joint operations would require one fueling operation instead of two, as compared to two separate operations running concurrently.

Electrical Supply Plan

16. Identify the proposed electrical supplier

Response:

- a. Initial electrical service will be by portable generator, if permissible. Upon completion of the processing plant, the permanent power supply will be provided by NV Energy from the transmission corridor along Las Vegas Blvd.
- b. Same as above
- c. Same as above

17. Provide an estimate of the power supply needed; average day, daily peak, annualized average.

Response:

- a. The peak demand for the plant is expected to be 2.5 MW. Energy consumption is expected to be 2.5 kWhr/ton. The operation normally runs at close to full power but usage is dependent on which mode is used at the time. The plant may operate at different modes to produce a variety of different product specifications. The demand on a product by product basis cannot be determined at this time and hence it is difficult to provide specific details of power usage than the details above.
- b. Same as above.

- c. Same as above. Operating both individual options would require double the installed power listed above as compared to operating the one joint operation.

18. Provide an AutoCAD drawing to indicate the proposed power line alignment for all alternatives.

Response:

- a. See Attachment 4 for the proposed power line alignment alternatives.
- b. Same as above
- c. Same as above

Note: NV Energy may change the alignment at final design.

19. Provide information on power supply voltage and potential need for customers

Response:

- a. This information is unavailable at this time as detail design has not been done and is not required at this stage of the project. NV Energy can provide this information at the time design is done for power line construction.
- b. Same as above
- c. Same as above

20. Provide plans for two separate power lines for the Two Mine alternative

Response:

- a. See Attachment 4 for proposed power line alternatives.
- b. Same as above
- c. Same as CEMEX option.

21. Provide information whether the power lines will be above-ground or under ground

Response:

- a. It is expected the power lines will be above ground due to the nature of the terrain in the area.
- b. Same as above
- c. Same as above

22. Provide location of generator, fuel supply and preliminary on site distribution lines

Response:

- a. Location of generators and fuel supplies will be shown on the plant site drawing. Generators must be permitted through Clark County Air Pollution Control District (CCAPCD).
- b. Same as above
- c. The joint plan would require power generation for one operation – same as the CEMEX proposal.

Excavation Geometry

23. Provide limits (horizontal & vertical) of desirable material based on geological investigation

Response:

- a. The mining limits are established by the site geology. The SRP property is limited by the unusable volcanic rock in the southern half of the ¼ section. Depths of the mine plan are set by reserve requirements. The mine bottom is set at the 2,500 foot elevation. Usable rock exists at deeper elevations. (Map and sections in Shumway, 2009).
- b. The mining limits are established by the site geology. The CEMEX property is all carbonate rock and is all usable for product. Depths of the mine plan are set by reserve requirements. Mine bottom is set at the 2,500 foot elevation. Usable rock exists at deeper elevations (Shumway, 2009).
- c. In the Joint plan, only the carbonate rock is proposed for mining (Shumway, 2009). The pit bottom is again at 2,500 foot elevation. A single mine is significantly more efficient than two adjacent mining operations.

24. Specify how the boundary between SRP and CEMEX will be taken down as the mine pit progresses

Response:

The boundary can be done in two ways: The first is to leave a wedge of rock along the boundary line. This option is not supported by the BLM or the two companies as it results in an inefficient use of potential reserves and is not the best option for future end use of the site. The second, and only realistic option, is to have a surveyed line and monitor excavated rock

locations to determine who has extractive rights to the rock. The two companies would then coordinate the extraction rates to ensure the process was safe and does not impede the other operator when extracting along the common boundary.

- a. Mining in the SRP property will take approximately five years before impacting the CEMEX boundary.
- b. Mining on the CEMEX property will not impact the SRP boundary for approximately 10 years.
- c. Joint mining will impact the boundary area in two years. However, under this option the boundary becomes irrelevant as there is only one operator for the combined site.

25. Provide drawings that indicate the elevation of this boundary at 5, 10, 15, 20-year phases.

Response:

See CAD drawings.

- a. See the drawings that indicate the elevation of the surveyed boundary at 5, 10, 15 and 20 year mining phases.
- b. Same as above
- c. The Joint plan is significantly more efficient than two separate operations operating concurrently.

26. Provide general plan for overall excavation- boundaries, phasing, storm water management

Response:

See the accompanying mine and plant plans. Excavation will be accomplished by the following mining system:

- Survey and place permanent boundary posts to delineate property lines.
- Ensure that requirements of the biological study report obligations are met.
- Removal of all potential topsoil and growth medium and stockpile these materials for reclamation efforts
- Begin open pit mining sequence to include a bench type mining operation. All rock will be drilled and blasted.
- When the mining sequence is complete, all mining areas will be stabilized to preclude unsafe conditions.
- Replace topsoil on benches to be reclaimed.

- Ensure requirements of the biologic and botanical study obligations are met.
- Monitor reclamation for revegetation success.

All mine phasing will be determined by market conditions. All mining activities will conform to the site Storm Water Management Plan. Storm Water drainage in the mining area will be contained internally. There will be no storm water flow outside the mining area.

- a. Same as above
- b. Same as above
- c. Concerns about boundaries, phasing and storm water management will be significantly reduced in the Joint plan.

27. Above plans should include AutoCAD maps, cross-sections and illustrations

Response:

All mine plans will be in AutoCAD.

- a. See accompanying CAD maps and plans.
- b. Same as above
- c. Same as above

Methods of Excavation

28. Provide plan specifics for where and how will explosives will be stored

Response:

All explosives will be stored according to ATF, MSHA and State of Nevada requirements if on- site storage is required. The main explosive agent is ANFO (Ammonium nitrate and fuel oil) which is stored as separate components until use. In individual form neither component is explosive. Detonators and initiation boosters are the other blasting components that are used.

There are three options for explosive storage;

- No onsite storage – all blasting services will be contracted.
- Store ammonium nitrate on-site only, all other blasting agents will be brought onsite by the contractor.
- Store ammonium nitrate (not an explosive), one booster magazine and one detonator magazine, all meeting ATF, MSHA and State requirements.

The three options will be reviewed to determine which is appropriate for the successful bidder.

- a. Same as above
- b. Same as above
- c. The Joint plan requires only one set of magazines if the on-site storage option is used.

29. Provide details of methods and intervals for blasting

Response:

Blasting is accomplished by designing each shot based on immediate geology and known blasting parameters. This process determines the blasthole diameter, hole depth, stemming depth, hole angle, burden and spacing distances. The hole locations are then surveyed and drilled according to the shot design. The charging of the shot begins by priming the blasthole with an electronic or non-electric detonator (testing will determine which is suitable) and booster. The hole is then loaded to within the designed stemming depth of the hole top. The rest of the hole is then back filled with drill cuttings and / or crushed gravel to stem the hole and prevent ejection of the blast energy.

Predetermined safety inspections and checks are in place to ensure the safe initiation of the shot. The airblast and ground vibrations are monitored and documented by specialized blast monitoring systems and video for post-analysis and process improvement techniques.

The blasting intervals are determined by many factors which vary throughout the life of the operation. These include production requirements, development stage of the bench, available area for the shot, weather conditions – both immediate and seasonal. Typically blasting intervals could be anywhere from several smaller shots per week to as long as several months between shots. It would be expected that on average, once the initial development is completed, the intervals would be two or three shots per month.

- a. Same as above
- b. Same as above
- c. Blasting for one operation would be more efficient than blasting for two adjacent sites.

30. Provide details of methods to notice adjacent landowners of blasting

Response:

At this time it is anticipated that due to distance and the use of modern blasting techniques, no notice of blasting will be required. Should it be determined at some time in the future that it is required, an appropriate notification process will be developed to meet the needs at that time.

- a. Same as above

- b. Same as above
- c. Same as above

31. Provide model of anticipated vibration due to blasting at proposed nearest residences and other structures, and calculate potential for damage to nearest structures due to excavation and blasting activity

Response:

During initial blasting operations, a vibration and airblast study will be completed to determine the effects of blasting on adjacent property owners. These studies are dependent on the actual results and are conducted during initial trial blasts to determine optimum blast designs. Based on previous experience and the proximity of local residents being as far from the proposed property as they are, it is anticipated that adverse impacts on these neighbors is unlikely. Should theoretical blast modeling be required at this stage of the process, it would be the responsibility of the EIS consultant.

- a. Same as above
- b. Same as above
- c. Same as above

Plant Operation

32. Provide information consistent with application for air quality permit; including equipment (type, year, and horsepower), quantity, number of trips per 24 hours, 8 hours, etc. What is the amount of load and what materials will be hauled, how much, where to? What will be done with it, etc.? We need this to calculate anticipated air quality emissions

Response:

The majority of the trucks delivering product are 18 wheel diesel powered tractors pulling two bottom dump trailers. They carry a total of 42 tons per trip. Other smaller truck configurations could deliver product from these operations. For purposes of this document, we have used a conservative average load of approximately 32 tons to calculate anticipated truck trips, as previously submitted by CEMEX in the MRP. The number of trips depends on market conditions. The equipment listed on Table 1 generally does not leave the site. The loaders, haul trucks, dozers, pickup trucks could operate 24 / 7. The CAT haul trucks carry 85 to 100 tons per load. Emissions can be calculated from data in the Caterpillar Handbook.

The plant and mine equipment are scheduled to operate based on market demand, up to 24 / 7. Plant and mine equipment will operate on an as needed basis to meet market demand.

- a. Same as above
- b. Same as above
- c. The two site operation scenario requires two sets of the above listed equipment. A Joint operation would operate on one set of equipment, resulting in a significant saving in equipment costs and environmental impacts.

Table 1 – Equipment list for all Options					
Circuit	Item	Make	Size	Horsepower	Quantity
Quarry					
	Loader	CAT / Other	992D to G	800	2
	Haul truck	CAT / Other	777C to 785C	950	4
	Dozer	CAT / Other	D-8 to D-10	410	1
	*Rock Drills	Other	Track to Bench	150	2
	*Compressor	Other	200 CFM	85	1
Load out					
	Loader	CAT / Other	980G to 988F	320	2
Plant					
	Fuel / Lube	Open	2 – 8 ton	85	2
	Man lift	Open	60 to 80 ft.	90	1
	Water Truck	CAT / Other	10,000 gal	700	1
	Water Truck	CAT / Other	8,000 gal	650	1
	Service Truck	Open	2 – 5 ton	100	2
	Loader	CAT / Other	910	100	1
	Crane	Open	35 to 60 ton	90	1
	Skid Steer	Open	0.25 to 1 CYD	60	1
	Forklift	Open	6 ton +/-	80	1
	Pickup truck	Open	¾ ton	80	4

* The rock drills and compressor may be contracted out.

Material Supply

33. Provide list of materials (other than fuel) anticipated to be delivered to the site, e.g. Portland cement, other components not produced on site. Include anticipated backhaul of concrete, asphalt, or other construction debris to be recycled. Include volumes and identify storage areas

Responses:

After plant construction, it is not anticipated at this time that materials (other than fuel, lubricants and operating supplies) will be delivered to the site. However, should future product specifications require additives (e.g. Portland cement to road base) these items could be imported to the site.

- a. Same as above
- b. Same as above
- c. Same as above.

Fuel and Material Control Plan

34. Provide Lay down areas and/or enclosure locations for materials brought to site

Responses:

The site lay down and parts storage is located in the south-west portion of the plant site for all three scenarios. See the Plant Layout.

- a. Same as above
- b. Same as above
- c. Same as above

35. Provide specific location for fuel and material storage

Responses:

Fuel storage and material storage is shown on the Plant Layout for each option.

- a. Same as above
- b. Same as above
- c. Same as above

36. Provide access path and circulation plan for fuel and material storage areas.

Responses:

See the Plant Layout for access and the circulation to the fuel area and material areas. These are the same paths for production and supply vehicles.

- a. Same as above
- b. Same as above
- c. Same as above

Hazardous Materials Control Plan

37. Provide specifics for response to release hazardous materials, including spill containment and cleanup plan.

Responses:

Specific hazardous material response plans will be developed in accordance with approved agency requirements. All hazardous materials on-site (see the Hazardous Material Table 2 on next page) will be stored properly in approved containers with secondary containment. All employees will have spill prevention and clean-up training. Training includes required contact with appropriate agencies and Hazardous Materials contractors.

- a. Same as above
- b. Same as above
- c. Same as above. The Joint option will have one set of Hazardous Materials instead of two for separate operations operating concurrently.

Table 2: Listing Common Hazardous Materials found in some Construction Aggregate Plants

Motor oil	Hydraulic oil
Acetylene	Lubricating grease
Anti-freeze	Solvents
Engine starting fluid	Spray paint
Gasoline	Transmission fluid
Gear oil	WD-40
Diesel Fuel	Parts Cleaners

38. Provide specifics for hazardous materials disposal methods and destination.

Response:

Specific Hazardous Material Response Plans will be developed in accordance with the agency requirements but typically all waste hazardous materials will be handled and removed by an agency approved HAZMAT contractor.

- a. Same as above
- b. Same as above
- c. Same as above

Dust Control Plan

39. Provide site specific dust control plan including equipment, staffing, and quantity of materials estimated to be required.

Response:

The following is a summary of the dust control plan:

- Access roads will be paved by the time full production is achieved. Trucks leaving the facility will pass a wheel wash system and immediately will exit onto paved road. The road surfaces will be swept and rinsed as needed to control dust and track-out.
 - All unpaved roads will be watered with suitable water trucks. Each truck will have a water cannon along with side and rear discharge spray mechanisms. The water trucks will pre-water blasting areas and stockpiles. Chemical applications (i.e. Calcium chloride, water based polymers, etc.) will be used in areas that are appropriate.
 - Crushers / Screens – Baghouse dust collectors or similar insertable technology will be used to control particulate emissions at crushing and screening points. The baghouses will be operated in accordance with recommended operating parameters from the manufacturer. Foam sprays will be tested in the crushing plant. Appropriate enclosures will be installed to minimize particulate emissions.
 - Conveyors and stackers – Water fog sprays or appropriate dust extraction technology will be used at key transfer points. Foam sprays may be tested. Appropriate enclosures will be installed to minimize particulate emissions.
- a. Same as above
 - b. Same as above

- c. Same as above

Water Supply and Conservation Plan

40. There are two existing water wells near the proposed mine site. Will both SRP and CEMEX be drawing from those wells under Two Separate Mine alternative?

Response:

- a. SRP will drill a new water well in a location recommended by a hydro-geologist.
- b. CEMEX will use the existing Bernadot well east of their property.
- c. If the properties are operated jointly, then a new well will be drilled and the Bernadot well will be used. In the future water may come from a SNWA proposed pipeline passing west of the property.

41. Provide an average/estimate of water use for mined material (i.e. X gallons of water are generally required to mine 1 ton of aggregate), or alternatively provide an estimate for the annual consumption of water for each mine alternative(the SRP mine plan, the Cemex mine plan, and the Joint Venture mine plan); include anticipated volume used in production of Portland cement or other products.

Response:

As a rule it takes 100 to 150 acre feet of water to produce 1 million tons of construction aggregates. No Portland cement will be produced on the site. The bidder selected by the BLM to operate the property is responsible for producing the required amount of water. Given the current LVVWD plan, public water should be available for the site within the next 2 to 3 years.

- a. SRP operating alone would require 500 to 750 acre feet per year at maximum production levels.
- b. CEMEX operating alone would also require 500 to 750 acre feet per year at maximum production, however in the first 8 years there is sufficient water available from the Bernadot well (322 ac-ft.) to produce the anticipated market demand volumes.
- c. The water requirements for the joint operation would be 700 to 1,050 ac ft per year. This option is significantly more efficient than providing water for two duplicate sites.

42. Provide plans for water capture, treatment, and recharge of used water to groundwater.

Response:

For all options, process water will be recycled using the most economic methods available. These may include mechanical presses, sealed and lined ponds and other water treatment techniques. Stockpile areas will be designed to ensure maximum recapture of surface waters. No process water is planned to discharge to the groundwater. The specific processes will be determined at the detail design stage by the successful bidder.

- a. Same as above
- b. Same as above
- c. Same as above.

43. If pipelines will be needed to bring water from the SNWA pipeline to the mine, provide the alignment of the proposed pipelines

Response:

From contact with Joe Freeman, Right of Way Agent for the Southern Nevada Water Authority/Las Vegas Valley Water District (LVVWD):
The LVVWD plans a reservoir on a 40 ac site NE of the present go-kart race track along the I-15 corridor. The CC Department of Aviation will run a line from the reservoir to the Heliport facility when needed, and one from the reservoir to the Ivanpah Airport site, when needed, probably around 2010. Any connections for other vicinity uses, such as the Sloan Pit, will be at the reservoir site. The successful bidder will use either wells in the area and/or work with the LVVWD as necessary and appropriate.
The alignment of the proposed pipeline from the LVVWD reservoir would be along the access roads to the CEMEX and SRP plant sites. See the mine plans and the Access Road and Utility Alignment - Attachment 4.

- a. Same as above
- b. Same as above
- c. Same as above. The Joint plan would only require a single pipeline.

44. Provide anticipated volume of groundwater will be pumped annually for each of the alternatives

Response:

It is anticipated that it will require 10 years for each option to achieve full production.

- a. SRP would pump to the capacity of available water rights up to approximately 500 to 750 ac. feet of water at full production.
- b. CEMEX would pump to the capacity of available water rights up to approximately 500 to 750 ac. feet of water at full production.
- c. The Joint operation would pump 700 to 1,050 ac ft.

45. Provide plans for dewatering of the mine pit if anticipated

Response:

The mine is not anticipated to encounter groundwater. Any water entering the mine through weather will percolate into the ground water or captured to supplement process water needs. No dewatering is required.

- a. Same as above
- b. Same as above
- c. Same as above

46. Provide volume of currently owned and anticipated water rights and provide volume of water anticipated to be obtained via offsite sources

Response:

As described in question #44, all options will require a minimum of 500 to 1,050 acre feet of water at full production with current available technology. It is expected that full production will be achieved in 10 years. In the first year, 50 to 100 acre feet will be required for each option.

- a. SRP has water available in the Las Vegas Basin and plans to change the point of diversion of those rights to the project, if SRP is the successful bidder.
- b. CEMEX has 332 ac ft. with the Bernadot well. A Right of Way access application has been submitted to the BLM by the CEMEX contractor.
- c. The Joint plan proposes SRP and CEMEX to share the responsibility of providing water. There is sufficient water available from both sources.

47. Provide alignment of anticipated waterlines supplying the site as well as on site distribution lines.

Response:

- a. SRP water lines would run along the access road – see Attachment 4.
- b. CEMEX would pipe in water from the Bernadot well east of the mining area. See the accompanying CAD mine plan / Attachment 4.
- c. The joint operation would use the Bernadot well plus one on-site well. See the accompanying CAD drawing / Attachment 4.

48. Provide specific number, volume and location of water tanks to be placed on site.

Response: See CAD plans for tank locations.

- a. SRP would have one 10,000 gallon tank.
- b. CEMEX would have one 10,000 gallon tank.
- c. The joint operation would have one 10,000 gallon water tank.

Solid Waste Control & Disposal Plan

49. Provide plans to avoid wind-blown trash from exiting the site.

Response:

- a. All trash containers will have secure wind proof lids. Employee training will emphasize the importance of proper solid waste handling. A recycling program will be part of the solid waste handling program.
- b. Same as above
- c. Same as above. The Joint plan produces significantly less trash than the two separate operations combined.

50. Provide statement regarding potential types of solid waste to be generated.

Response:

- a. Solid waste generated at the site is limited to office and maintenance refuse. All glass, paper, cardboard and steel will be recycled. All metal maintenance scrap can be recycled. Used oil

filters can be drained and crushed with used oil being recycled by an approved contractor.

- b. Same as above
- c. Same as above. The Joint option will produce significantly less waste than the two separate operations operating concurrently.

51. Provide plan including volume, frequency and destination of solid waste disposal.

Response:

- a. All solid waste will be placed in covered dumpsters handled by a County approved solid waste contractor. All solid waste possible will be recycled. Frequency of disposal will be what is required to ensure the site is kept clean and in orderly state. The destination of the waste will be determined by the designated contractor. It would be expected that typical waste would be delivered to an approved landfill, such as Republic's Apex location.
- b. Same as above
- c. Same as above

Visual Impact Mitigation Plan

52. There is mention of a ridge that will be "set aside" to act as a visual barrier for the City of Henderson; Clarify if this is an existing geographical feature or a ridge be constructed from waste material; indicate location on a topographic map. Provide copies of Agreement with the City of Henderson

Response: The previous EA prepared by NECI addresses the visual impact issue in it's Visual Resources Section. See included copies of the NEIC Visual study in Attachment 1. The ridge around the mine left as visual screen is shown on the mine plan.

- a. SRP mine plan will leave a ridge along the east mine boundary which will impact the line of sight from Henderson communities. Photography from Henderson residential areas was used to establish the ridge elevation.
- b. CEMEX proposes a significant visual impact mitigation plan. The 160 acres of the north ¼ of Section 29 will be left undeveloped as a major visual screen. The mine plan along the east boundary of CEMEX mine plans is modified to leave a ridge of rock to preclude residents from the Henderson communities seeing mining operations. The previous EA produced by NECI

addresses this specific issue. See the accompanying Visual Resource Section of the NECI document in Attachment 1.

c. Same as above and see location of visual barriers on the mine plan.

53. If night-time operations are anticipated, provide types of light (watts), approximate quantity and preliminary illumination characteristics. Plan must include light location, height and anticipated luminaire characteristics and direction of lamination

Response:

- a. For night time operations, the only lighting will be in the plant site area. Mining vehicles have their own lighting. Sodium lighting will be used in the plant area on 500 foot centers (See the Plant Layout CAD plan). Proposed light locations are shown on the Plant Layout plan, however, it should be understood that this is something to be dealt with in detail design by the successful bidder. Detail design cannot be justified at this point in the competitive bid process. The principle to be applied will be to ensure there is sufficient lighting for the safe operations of the site while minimizing the impact on those off site.
- b. Same as above
- c. Same as above. Off site lighting impacts will be less for the Joint options than for two sites operating independently.

54. Provide elevation drawings/information on proposed plant equipment for analysis of visual impact

Response:

- a. The proposed plant sites are at the 2,800 ft elevation and the lowest ridge for the visual screen is 3,000 ft. All plant equipment will be below the field of vision of neighbors.
- b. Same as above
- c. Same as above

Noise Attenuation Plan

55. Provide a Noise Attenuation Plan including competent analysis of decibel level of equipment, expectant dispersal over site specific terrain, decibel levels at critical receptors.

Response:

- a. All applicable information relating to operating hours and equipment has been provided and should a detailed noise study

- be required, then it should be the responsibility of the EIS consultant.
- b. Same as above
 - c. Same as above. Noise from a single plant will be less than two independent facilities operating facilities.

Wildlife Protection Plan

56. Wildlife protection measures will be dictated by the terms and conditions of the Biological opinion issued to be issued by US Fish and Wildlife Service

Response:

- a. The Biologic Opinion will dictate the terms and conditions of measures to be taken.
- b. Same as above
- c. Same as above

57. Provide anticipated mitigation measures applicants will put in place. Provide anticipated take for Threatened and Endangered Species

Response:

- a. SRP will rely on the biologic and botanical studies to be completed during the EIS process to determine mitigation measures.
- b. CEMEX can use information and measures included in the NECI data in Appendix 3. If this is not sufficient then further studies should be the responsibility of the EIS contractor.
- c. The joint plan can use NECI data and the current biologic study information to determine mitigation measures. The joint plan will have reduced impacts to the Threatened and Endangered species.

58. Provide specifics for the installation, maintenance, monitoring and removal of the proposed tortoise fencing

Response:

- a. If Tortoise fencing is required, one will be installed where practically possible as per BLM requirements. At this time no detail design has been determined. This will be done by the successful bidder.
- b. Same as above
- c. Same as above. Tortoise impacts will be reduced with the Joint plan due to the need for only one access road.

Reclamation Plan

59. Provide specifics of the reclamation proposed and required, including topsoil redistribution, dust palliative, revegetation, etc.

Response:

The reclamation plan includes the following:

- A biologic and botanical inventory of the site.
- Action is planned per the above inventory, (i.e. Tortoise mitigation, plant salvage, seed collection, etc.
- Salvage and stockpile all available topsoil.
- Stabilize all stockpiles to minimize dust emissions.
- Complete mining sequence.
- Stabilize all mining areas. Do not leave any hazardous conditions.
- Return topsoil using the "island method". A lack of topsoil makes this viable.
- Return any salvaged plants and bring in seeds to enhance density and diversity.
- Document and monitor the revegetation effort.

- a. Same as above
- b. Same as above
- c. Same as above

60. Provide specifics on potential for abandoned mine to collect storm water or become a nuisance impoundment.

Response:

- a. The rock in this area is heavily jointed and fractured and will readily percolate atmospheric water. The completed pit will have multiple end use possibilities, such as, industrial / commercial development, also a potential landfill or off road vehicle recreation area. These options should be explored with the appropriate agencies prior to the potential closing of the property.
- b. Same as above
- c. Same as above

References:

Environmental Assessment: Mojave Mineral Project (2003) Nevada; Environmental Consultants, Inc, prepared for: Bureau of Land Management; Submitted by Rinker Materials West. LLC; unpublished report May 22, 2003, 106p.

Shumway, D. C., 2009, Sloan Project Geology, unpublished report 4p.

Attachments:

Attachment 1: Visual Impact Images *from*: Environmental Assessment Mojave Mineral Project: Prepared by Nevada Environmental Consultants. Inc., May 22, 2003 (Figures 1-5), and Figure 6.

Attachment 2: Biological Resources from: Environmental Assessment Mojave Mineral Project: Prepared by Nevada Environmental Consultants. Inc., May 22, 2003

Attachment 3: Proposed Timeline

Attachment 4: Access Road and Utility Alignment