FLORENCE COPPER, INC.

UIC PERMIT APPLICATION

FLORENCE COPPER PROJECT – PRODUCTION TEST FACILITY

ATTACHMENT Q – PLUGGING AND ABANDONMENT PLAN

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List of Exhibits

Exhibit Q-1 Copy of Aquifer Protection Permit No. 106360 Issued by ADEQ, dated July 3, 2013

Exhibit Q-2 Closure and Post-Closure Plan

Exhibit Q-3 EPA Forms 7520-14, Plugging and Abandonment Plans for Existing Wells and Core Holes

Exhibit Q-4 EPA Forms 7520-14, Plugging and Abandonment Plans for Class III Wells

Q.1 Introduction

This Attachment has been prepared in support of an application (Application) by Florence Copper, Inc. (Florence Copper) to the United States Environmental Protection Agency (USEPA) for issuance of an Underground Injection Control Class III (Area) Permit (UIC Permit) for the planned Production Test Facility (PTF), to be located at the Florence Copper Project (FCP) in Pinal County, Arizona. Florence Copper is submitting this Application so that it may proceed with the development of the PTF to demonstrate the feasibility of a future full scale in-situ copper recovery (ISCR) facility. As required for Attachment Q under USEPA Form 7520-6, this Attachment describes the plan for plugging and abandonment of the proposed Class III wells, and the proposed corrective action for existing and planned Class III wells on the FCP site. This Attachment also describes the corrective action Florence Copper will undertake to plug and abandon non-Class III wells and core holes as identified in Attachment C of this Application.

This plugging and abandonment plan is consistent with the Closure and Post-Closure Plan included in Florence Copper's related Aquifer Protection Permit (APP) No. 106360 issued by the Arizona Department of Environmental Quality (ADEQ) for PTF operations at the FCP. For the reviewers' convenience, a copy of Temporary APP No. 106360 is provided as Exhibit Q-1 to this Attachment. The current closure and post-closure requirements are described in Sections 2.9 and 2.10 of Temporary APP No. 106360.

The closure and post-closure language included in Temporary APP No. 106360 conforms with and governs all proposed closure and post-closure plans previously submitted to ADEQ in conjunction with the application for Temporary APP No. 106360. A closure and post-closure plan is included as Exhibit Q-2 to this Attachment.

Q.1.1 Applicability

This plugging and abandonment plan is applicable to both proposed Class III wells, and all other Class III and non-Class III wells and core holes, within the PTF area and the associated Area of Review (AOR) located at the FCP site, 1575 West Hunt Highway, Florence, Arizona 85132. This plan applies to all the wells and core holes because the proposed corrective action for all wells and core holes within the AOR is to plug and abandon them using the same standards as will be applied to abandonment of Class III wells. The AOR is defined in Attachment A of this Application as a 500-foot zone around the permitted PTF area.

This plan also applies to existing Class III wells outside of the PTF AOR that were constructed by BHP in accordance with UIC Permit No. AZ396000001. The BHP Class III wells may be plugged and abandoned following completion of PTF operations if Florence Copper chooses not to proceed with commercial scale operation on the property. If Florence Copper chooses to proceed with commercial scale operations on the FCP property, they may incorporate the existing BHP Class III wells into future phases of FCP operations.

This plan has been designed to ensure that all existing and future wells and core holes located within the AOR (a 500-foot area circumscribing the proposed PTF well field) will be plugged and abandoned (1) in a manner that will prevent or stop the flow of injected solutions into or out of a underground source of drinking water (USDW) through a penetrating core hole or well and (2) in accordance with applicable permits and regulations administered by the USEPA, the ADEQ, and Arizona Department of Water Resources (ADWR).

Plugging and abandonment of existing non-Class III wells and core holes within the AOR will occur prior to commencement of injection at the PTF. Plugging and abandonment of Class III wells will occur during closure, or whenever an individual Class III well is retired because of irreparable non-compliance with mechanical integrity test requirements.

All abandonment notifications, approvals, procedures, documentation, and reporting required under this plan, and Exhibit Q-2 of this plan, apply to all Class III wells constructed within the PTF AOR and Class III wells constructed by BHP within the AOR established by UIC Permit No. AZ396000001.

Q.1.2 Objectives

The objectives of the plugging and abandonment plan are to ensure that wells and core holes will be plugged and sealed in a manner that will prevent the migration of injected fluids into or between USDWs, and to ensure compliance with the applicable requirements of the ADWR (Arizona Administrative Code [A.A.C.] R12-15-816 [Abandonment], Arizona Revised Statutes [A.R.S.] § 45-402 *et seq.*, and ADWR Well Abandonment Handbook) and the USEPA (40 Code of Federal Regulations [CFR] 146.10 [Plugging and Abandoning Class I-V Wells]).

Q.1.3 Hydrogeologic Setting

The saturated geologic formations underlying the FCP site have been divided into three distinct water-bearing hydrostratigraphic units referred to as the Upper Basin Fill Unit (UBFU), Lower Basin Fill Unit (LBFU), and the Bedrock Oxide Zone. The UBFU and LBFU are separated by a thin, regionally extensive aquitard referred to as the Middle Fine-Grained Unit (MFGU). The injection and recovery wells will be completed in the Bedrock Oxide Zone, the uppermost zone of the bedrock complex underlying the FCP site.

Q.1.4 Overview of PTF Operation

The PTF area will be prepared for operations through a three-step process that includes: (a) the abandonment of core holes and existing wells (except Class III wells and monitoring wells) within the PTF and within 500 feet of the PTF well field; (b) the installation of injection, recovery, and observation wells as required; and (c) the installation of ancillary facilities such as pipelines, tanks, roads, and power lines.

PTF operations will consist of the injection of a dilute sulfuric-acid solution (lixiviant) into a pre-defined interval of the oxide zone to dissolve copper and to recover the resulting copper-bearing solution. If necessary, the recovered solution may be re-acidified and re-injected to enrich the copper concentration in solution until the copper concentration is sufficient to support solvent extraction/electrowinning (SX/EW) operations. When the copper concentration meets a desired grade, the recovered solution (pregnant leach solution [PLS]) will be conveyed via an above-ground pipeline to the SX/EW plant for processing.

Once copper concentrations in recovered solutions decline to a level indicating depletion of the ore, closure will begin by replacing the volume of lixiviant injected into the oxide zone with fresh groundwater. Closure will continue with the injection of fresh groundwater. Depending on copper content, solutions produced during closure operations will be withdrawn through the recovery wells and conveyed to the SX/EW plant for processing, or re-injected into the unit from which it was produced, or conveyed via a neutralization circuit to the proposed water impoundment.

Flushing of the oxide zone will be discontinued and the PTF will be provisionally considered to be closed once constituent concentrations in the groundwater in the flushed zone meet the closure criteria specified in the UIC Permit and the related APP. Not more than two years following the provisional closure of the PTF, all wells within the PTF will be abandoned in accordance with the procedures outlined in this plan.

At the conclusion of PTF operations, proposed Class III wells within the AOR will remain open for use in monitoring groundwater conditions until ADEQ and USEPA give approval to plug and abandon the wells. Section 2.9.2 of APP No. 106360 requires that the PTF wells remain open to facilitate sampling at one month, sixth months, and one year following the conclusion of formation rinsing, and further requires that written authorization be obtained from both ADEQ and USEPA prior to plugging and abandonment of the PTF wells. ADEQ and USEPA may choose to require additional monitoring after the one year samples have been collected. In any event, PTF Class III wells will not be plugged and abandoned until written authorization to do so has been received from both ADEQ and USEPA.

Post-closure monitoring at the POC wells and supplemental monitoring wells will continue for a period of at least five years following the completion of formation rinsing. The supplemental monitoring wells will remain open for at least five years following the cessation of rinsing, and until receipt of written authorization from both ADEQ and USEPA.

Q.2 Licenses, Notifications and Approvals

Q.2.1 Licensed Drillers

Abandonment procedures are described in Section Q.3 and will only be performed by well drillers licensed by the ADWR pursuant to A.R.S. § 45-595(B), or under the direction of such licensed well drillers.

Q.2.2 Abandonment Notification and Authorization

Florence Copper will convey notice of intent to abandon a well or core hole to ADWR using Form 55-38 (*Notice of Intent to Abandon a Well)* approximately 30 days prior to the planned commencement of abandonment activities for a well or core hole. Form 55-38 will include information describing the location, type, and construction of the well or core hole, and the proposed plugging or abandonment method.

In addition, Florence Copper will convey notice of proposed abandonment of Class III and Non-Class III wells and all core holes to USEPA on Form 7520-14 (*Plugging and Abandonment Plan)* approximately 60 days prior to the planned abandonment. The form will include descriptions of the proposed abandonment materials and methods to be employed during abandonment. Copies of Forms 55-38 and 7520-14 will be submitted to ADEQ as they are submitted respectively to ADWR and USEPA.

Once ADWR has approved the abandonment method and materials identified on ADWR Form 55-38, ADWR will issue authorization to the driller to commence with the proposed abandonment. Authorization from ADWR will be in the form of a "well abandonment card" issued to the licensed driller. No well or core hole will be abandoned on the FCP site unless the driller has received a well abandonment card, issued by the Director of the ADWR, authorizing the abandonment of the specific well or core hole.

Q.3 Well and Core Hole Abandonment Procedures

The standard abandonment procedure will be to completely fill the well or core hole with an appropriate sealing material, with some variation depending on the type, condition, and total depth of the well or core hole. The condition and depth of each well or core hole will vary. Abandonment will be considered complete when all applicable sealing steps set forth in Section Q.3.3 below have been completed or have been found unnecessary.

Q.3.1 Well or Core Hole Preparation

The following tasks will be performed to prepare each well or core hole for effective sealing.

a. Locate and Inspect Well or Core Hole: The well or core hole will be located using available survey coordinates. The condition and location of the well or core hole will be recorded. If the well or core hole is not visible from the surface, the area will be excavated to locate the collar of the core hole or expose the surface casing of the well.

b. Move in Workover Rig: A workover rig, capable of performing the required abandonment operations at the required depths will be moved in and set up over the well or core hole.

c. Equipment Removal: All pumps, tubing, wiring, and ancillary equipment within the well will be removed prior to abandonment of the well. Core holes do not have such equipment.

d. Perforations: If records demonstrate that a well annulus is inadequately sealed and its casing is not removed, the casing will be perforated to allow installation of cement grout in the annulus. If necessary and the casing extends that distance, perforations will extend from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU, and from 25 feet below ground surface (bgs) to 5 feet bgs.

e. Cleaning: Wells and core holes will be cleaned out if necessary to a depth of at least 100 feet below the bedrock-LBFU contact to enable proper placement of cement seals. This will be accomplished by installing a workstring of tubing and circulating fluids, or drilling, or performing other remedial work as required to clean the well or core hole to the required depth.

f. Equalization of Wellbore Fluids: After cleaning the well or core hole, wellbore fluids (bentonite mud) may be circulated and treated as necessary to achieve equilibrium and stabilize the hole.

Q.3.2 Equipment and Materials

The following material and equipment will be used in sealing wells and core holes according to the procedure described in Section Q.3.3 if required to make proper seals.

a. Cement Grout: All cement grout will consist of Type V cement, or approved equivalent.

b. Mechanical Plugs: A mechanical bridge plug will be set at the base of the interval to be cemented off if it is not at the bottom of the well or core hole. This will prevent migration of the cement plug below the interval to be cemented and sealed.

c. Cement Plugs: Cement plugs will consist of Type V cement grout or approved equivalent.

d. Cement Retainer: If cement grout is to be installed in the annulus behind perforated casing, a cement retainer will be set above the top perforation prior to pumping cement grout into the perforated interval that has been isolated by the cement retainer.

e. Workstring: A workstring of small diameter pipe or tubing will be used for the placement of cement grout and plugs.

Q.3.3 General Procedure for Sealing Wells and Core Holes

The following procedure will be used to seal each well or core hole:

a. If the surface casing is loose at ground surface, an attempt will be made to remove it. If removal of the casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

b. A tremie pipe will be used to place Type V cement in the open well or core hole from the bottom of the hole to the top of the hole. Cement retainers, as described above, will be used to force cement grout into the annulus behind perforated intervals, as necessary.

c. If the hole has been obstructed, cement will be placed as much as possible from at least 100 feet below the LBFU-bedrock contact to the top of the hole.

d. The volume of Type V cement will be recorded, and will not be less than the estimated volume of material required to fill each interval.

Q.3.4 Procedures for Special Circumstances

The following procedures will be completed for special circumstances, as indicated.

a. Seal of Perched Aquifer: If cascading water is encountered during preparation for abandonment, the well casing in the target area will be cleaned or perforated, isolated with cement plugs, and Type V cement will be used to seal the annulus around the perched layer. Cement seals will be emplaced in four steps as follows:

   1. In the area of the observed cascading water, existing casing perforations in the well will be cleaned to the point that they are open and will readily allow neat cement to pass, or new perforations will be cut that will allow neat cement to pass.

2. The well casing will be filled with Type V cement to a point at least 20 feet below the cascading zone, and will be allowed to cure for a minimum of 12 hours.
3. A packer will be emplaced above the cascading zone.
4. Type V neat cement will be injected under pressure into the cascading zone until a volume of cement has been pumped that is equal to or greater than the combined volume of the well bore and the annular space within the isolated zone.

b. Injection Wells: Injection wells plugged and abandoned in accordance with the procedures specified above will be deemed to have been plugged and abandoned in accordance with the provisions of 40 CFR 146.10. Therefore, Florence Copper will comply with the procedures specified above to ensure that any deviation from the above procedures will not violate the provisions of 40 CFR 146.10.

Q.4 Documentation and Reporting

Following completion of plugging and abandonment, reports will be recorded and filed, as described below.

Q.4.1 Reporting Responsibilities

The licensed driller or supervised designate will maintain a log of all abandonment activities. The log will be of sufficient detail that the driller will be able to complete all ADWR requirements and all abandonment reports to USEPA. The driller will sign all ADWR abandonment forms. The authorized Florence Copper representative will sign all narrative abandonment reports submitted to the ADWR and all abandonment reports to USEPA.

Q.4.2 Reports to ADWR

The licensed driller will complete and sign a *Well Abandonment Completion Report* (ADWR Form 55-58) and submit it to ADWR within 30 days following abandonment of any well (including Class III wells) or core hole. Form 55-58 will update the information provided on ADWR Form 55-38 (*Notice of Intent to Abandon a Well)* including updated information on the treatment, materials, and methods used for abandoning the well or core hole. Florence Copper will complete and sign a *Well Owner's Notification of Abandonment* (ADWR Form 55-36) and submit it to ADWR within 30 days following abandonment.

Q.4.3 Reports to USEPA

Within 60 days after plugging and abandoning a well or core hole or at the time of the next quarterly report due to the USEPA (whichever is less), Florence Copper shall submit a report to the Regional Administrator of USEPA. If the quarterly report is due less than 15 days before plugging and abandonment is completed, then the report will be submitted within 60 days. The report will be certified as accurate by the licensed driller who performed the plugging and abandonment procedures.

The report will consist of either:

- A statement that the well or core hole was plugged and abandoned in accordance with the plan previously submitted to the Regional Administrator; or
- An updated version of the plan on Form 7520-14, specifying differences if the actual plugging or abandonment differed from the plan previously submitted.

The report will also include a summary of non-class III wells and core holes abandoned, and will include copies of all forms (Forms 55-38, 55-58, and 55-36) submitted to ADWR.

Completed copies of Form 7520-14, and schematic diagrams of wells and core holes within the AOR, are provided as Exhibit Q-3 to this Attachment.

Q.4.4 Reports to ADEQ

Florence Copper will include in its quarterly APP monitoring report to ADEQ a summary noting the identification number of each well or core hole for which abandonment was completed during the reporting period, the date that the abandonment was completed, and the location of the well or core hole.

Florence Copper will also submit to ADEQ a copy of the plugging and abandonment report developed for submittal to USEPA in accordance with Section Q.4.3.

Q.4.5 Maintenance of Records

Copies of all completed and required abandonment report forms, plans and narratives required by ADWR or USEPA will be maintained at the FCP site for inspection until closure is completed. After commencement of post-closure, the records will be stored by Florence Copper, subject to review by USEPA and ADEQ, until post-closure is completed.

Exhibit Q-1

Copy of Aquifer Protection Permit No. 106360
Issued by ADEQ, dated July 3, 2013

STATE OF ARIZONA
TEMPORARY AQUIFER PROTECTION PERMIT NO. P- 106360
PLACE ID 1579, LTF 58398
OTHER AMENDMENT

1.0 AUTHORIZATION

In compliance with the provisions of Arizona Revised Statutes (A.R.S.) Title 49, Chapter 2, Articles 1, 2 and 3, Arizona Administrative Code (A.A.C.) Title 18, Chapter 9, Articles 1 and 2, A. A. C. Title 18, Chapter 11, Article 4 and amendments thereto, and the conditions set forth in this permit, the Arizona Department of Environmental Quality (ADEQ) hereby authorizes Curis Resources (Arizona) Inc. to operate the Florence Copper Project- Pilot Test Facility Florence, Pinal County, Arizona, over groundwater of the Pinal Active Management Area, in Section 28, Range 9E, Township 4S Gila and Salt River Base Line and Meridian.

For purposes of A.A.C. R18-9-A210(E), this permit becomes effective on the later of the following: 1) If no timely appeal is filed, upon completion of the public participation requirements under A.A.C. R-18-9-109; 2) If a timely appeal is filed, upon final decision of the water quality appeals board; or 3) upon the date specified by the permittee in a written notification to ADEQ that the permittee can use the authorization to operate the PTF granted by this permit.

1. Following all the conditions of this permit including the design and operational information documented or referenced below, and

2. Such that Aquifer Water Quality Standards (AWQS) are not violated at the applicable point of compliance (POC) set forth below, or if an AWQS for a pollutant has been exceeded in an aquifer at the time of permit issuance, that no additional degradation of the aquifer relative to that pollutant, and as determined at the applicable POC, occurs as a result of the discharge from the facility.

1.1 PERMITTEE INFORMATION

Facility Name:	Florence Copper Project Production Test Facility
Facility Address:	Curis Resources (Arizona) Inc. 1575 W. Hunt Highway Florence, AZ 85132
Permittee:	Curis Resources (Arizona) Inc.
Permittee Address:	1575 W. Hunt Highway Florence, AZ 85132
Facility Contact:	Dan Johnson, Vice President, Environmental
Emergency Phone No.:	(520) 374-3984
Latitude/Longitude:	33° 03' 1.4" N / 111° 26' 4.7" W
Legal Description:	Township 4S, Range 9E, Section 28 Gila and Salt River Base Line and Meridian

1.2 AUTHORIZING SIGNATURE

Michael Fulton, Director
Water Quality Division
Arizona Department of Environmental Quality
Signed this 3rd day of July, 2013

THIS AMENDED PERMIT SUPERCEDES ALL PREVIOUS PERMITS

2.0 SPECIFIC CONDITIONS [A.R.S. §§ 49-203(4), 49-241(A)]

2.1 Facility / Site Description [A.R.S. § 49-243(K)(8)]

The Temporary Individual Aquifer Protection Permit (APP) is for a Production Test Facility (PTF), a pilot scale test facility located on approximately 160 acres of the Arizona State Land (Mineral Lease 11-26500). The Temporary APP is to construct and operate a production test facility which shall provide sufficient data to assess and develop a full-scale in-situ mining operation.

The PTF will occupy approximately 13.8 contiguous acres and the PTF well field will occupy approximately 2.2 acres. Curis Resources (Arizona) Inc. proposes to construct and operate the PTF over a two-year period, estimated to include an approximate 14 month leaching phase and a 9 month mine block rinsing phase. The PTF will contain a total of 24 wells and consist of 4 Underground Injection Control (UIC) Class III injection wells, 9 recovery wells, 7 observation wells and 4 multilevel sampling wells. The proposed In-Situ Copper Recovery (ISCR) process involves injecting a lixiviant (99.5% water mixed with 0.5% sulfuric acid) through injection wells into the oxide zone of the bedrock beneath the site for the purposes of dissolving copper minerals from the ore body. The estimated injection zone is between approximately 500 feet below ground surface (ft bgs) to 1,185 ft bgs. The resulting copper-bearing solution will be pumped by recovery wells to the surface where copper will be removed from the solution in a solvent extraction electro winning (SX/EW) plant. The barren solution from the SX/EW plant will be re-acidified and re-injected back into the oxide zone. Other facilities proposed for the PTF will include the SX/EW Plant, Process Water Impoundment (PWI), Runoff Pond, tank farm and other ancillary facilities.

The site includes the following permitted discharging facilities:

Facility	Latitude	Longitude
In-Situ Area Injection and Recovery Well Block	33° 3' 1.39" N	111° 26' 4.69" W
Process Water Impoundment	33° 3' 8.67" N	111° 25' 22.18" W
Run-off Pond	33° 3' 4.66" N	111° 25' 22.6" W

Annual Registration Fee [A.R.S. § 49-242 and A.A.C. R18-14-104]
The annual registration fee for this permit is established by A.R.S. § 49-242 and is payable to ADEQ each year. The design flow is 432,000 gallons per day (gpd).

Financial Capability [A.R.S. § 49-243(N) and A.A.C. R18-9-A203]
The permittee has demonstrated financial capability under A.R.S. § 49-243(N) and A.A.C. R18-9-A203. The permittee shall maintain financial capability throughout the life of this permit. The estimated closure cost is $3,487,743. The financial assurance mechanism was demonstrated through a performance surety bond (A.A.C. R18-9-A203 (C)(2)).

2.2 Best Available Demonstrated Control Technology [A.R.S. § 49-243(B) and A.A.C. R18-9-A202(A)(5)]

This permit authorizes the temporary operation of the discharging facilities listed below, pursuant to A.A.C. R18-9-A210(E). The intent of the pilot test is to demonstrate that hydraulic control of the in-situ solution can be maintained at the site in order to conduct a copper recovery process. The discharging facilities and their BADCT descriptions are also presented in Section 4.1, Table 4.1-1.

2.2.1 Engineering Design

2.2.1.1 In-Situ Area Injection and Recovery Well Block

Design, construction, testing (mechanical integrity), and operation of injection and recovery wells shall follow EPA Class III rules (40 CFR Part 146). The maximum fracture pressure

shall be no greater than 0.65 pounds per square inch per foot (psi/ft) of depth. Hydraulic control shall be maintained at all times, within the pilot test facility well block, by pumping recovery wells at a rate greater than the injection rate in order to maintain a cone of depression. The injection and extraction volumes shall be metered at the well-heads, monitored daily, and recorded. Surface water control shall be provided for the PTF injection and recovery well sites.

2.2.1.2 Process Water Impoundment

The Process Water Impoundment (PWI), a process solution pond, shall be used to evaporate neutralized solutions and contain resulting sediments. The PWI shall be located immediately north of the runoff pond which is directly north of the SX/EW plant. The PWI shall have a capacity of approximately 1.7 million cubic feet, approximately 15 to 23-feet deep, with internal and external side slopes of 2.5-feet horizontal to 1.0-feet vertical (2.5H:1V), and maintain a minimum of two (2) feet freeboard. The PWI shall be designed as a double liner system and include a leak collection and removal system (LCRS). The liner system shall consist of, from bottom to top; a compacted sub-grade (foundation) with liner bedding, 60-mil HDPE secondary liner, geonet, and 60-mil primary liner. The LCRS shall be equipped with: a sump located at the lowest elevation of the pond; a sump pump to remove accumulated liquids; and an alarm system for fluid detection.

2.2.1.3 Run-off Pond

The Runoff Pond, a non-stormwater pond, shall be located directly south of the PWI, north of the adjacent SX/EW plant, and northeast of the Pregnant Leachate Solution (PLS) and Raffinate tank secondary containment structure. The Runoff Pond shall be designed to capture direct precipitation; stormwater runoff from the roofs of on-site structures, cathode storage slab and concrete apron on the south side of the SX/EW Building; fire sprinkler water or process solutions that may enter or overflow the SX/EW Building floor sump; and any spills on or wash down from these areas. The Runoff Pond shall have a capacity of approximately 6,583 cubic feet; approximately 5-feet deep; internal and external side slopes shall be no less than 2.0-feet horizontal to 1.0-feet vertical (2.5H:1V); and pond shall maintain a minimum of two (2) feet freeboard. The Runoff Pond shall be designed with a single liner that includes an engineered compacted sub-grade and 60-mil HDPE geomembrane liner. The Runoff Pond shall incorporate a sump equipped with a pump along with fluid-level detection equipment. When fluid is detected above the level set-point the pump will transfer fluid out of the Runoff Pond to the PWI via pipeline.

2.2.2 Site-specific Characteristics

Not applicable to this permit.

2.2.3 Pre-operational Requirements

a) All boreholes or wells, other than those approved for the PTF, located within 500-feet of the PTF well field boundary shall be plugged and abandoned per the Arizona Department of Water Resources (ADWR) rules and EPA Underground Injection Control (UIC) regulations prior to PTF operation. All boreholes or wells within a 150-foot radius of the Process Water Impoundment and Runoff Pond shall also be plugged and abandoned per the Arizona Department of Water Resources (ADWR) rules. Documentation records for the plugging and abandonment of all boreholes and wells within 500 feet of the PTF and within 150 feet of the Process Water Impoundment and Runoff Pond shall be submitted no later than 30 days prior to the start-up of the pilot study.

b) All Class III injection wells shall be drilled, cased and cemented according to the requirements of the UIC permit. Prior to commencement of operation, all new Class III injection wells shall meet the mechanical integrity testing (MIT) requirements of the UIC permit.

c) The permittee shall complete aquifer pump tests prior to injection in order to optimize knowledge of subsurface characteristics particularly within the targeted in-situ leaching zone and report in accordance with Section 2.7.4.3.

d) Inward hydraulic gradient towards the recovery wells shall be established prior to the injection of acidified process solution into the injection wells.
e) The permittee shall establish ambient mine block groundwater concentrations using an ADEQ approved statistical method (see Section 2.7.4.2) to determine pre-mining concentrations at the PTF wells in accordance with the Compliance Schedule (Section 3.0).

2.2.4 Operational Requirements

A description of required inspections and operational monitoring for BADCT is included in Section 4.1, Table 4.1-3.

The injection wells at the site are classified as Class III Injection wells by the USEPA and are permitted by EPA's UIC Program. The injection and recovery wells shall be designed to meet the mechanical integrity requirements in the UIC regulations, Code of Federal Regulations (CFR) part 144 and 146. All injection wells and recovery wells shall be designed and installed to prevent injection into the top 40 feet (the exclusion zone) of the oxide zone. The injection of the solutions shall be limited to the Oxide ore body only.

The PTF operation relies on hydraulic control of the ISCR solutions to demonstrate BADCT. Hydraulic control shall be confirmed through the use of observation wells to maintain an inward hydraulic gradient. An inward hydraulic gradient shall be measured by water level elevations in injection, recovery, observation wells. The rates of injection and recovery shall be continuously monitored and controlled so that the total volume of solution recovered is greater than the volume of solution injected, averaged over 24 hour period. Automatic controls and alarms shall be used in the well field to ensure process upsets do not result in the loss of hydraulic control. Hydraulic control over the injected solutions shall be maintained from the time injection begins and until well abandonment is completed by the applicant and approved by the appropriate agencies and groundwater in the mine blocks meets APP closure criteria. A description of required operational monitoring is included in Section 4.1, Table 4.1-8.

The injection pressure in the Class III injection wells shall be kept below the fracture pressure of the oxide ore body. A fracture gradient of 0.65 pounds per square inch per foot (psi/ft) of depth was established by field test data as being adequate to prevent hydraulic fracturing of the bedrock.

Observation wells located down-gradient of the injection wells may be temporarily converted to use as recovery wells in order to maintain hydraulic control.

2.3 Discharge Limitations [A.R.S. §§ 49-201(14), 49-243 and A.A.C. R18-9-A205(B)]

The permittee shall operate and maintain all permitted facilities listed below to prevent unauthorized discharges pursuant to A.R.S. §§ 49-201(12) resulting from failure or bypassing of BADCT pollutant control technologies including liner failure, uncontrollable leakage, overtopping (e.g., exceeding maximum storage capacity defined as a fluid level exceeding the crest elevation of a permitted impoundment), berm breaches, accidental spills, or other unauthorized discharges.

2.3.1. In-Situ Area Injection and Recovery Well Block

Hydraulic control over the injected solutions shall be maintained during the operating life of the facility. In-situ solutions shall be injected and contained within the oxide unit.

2.3.2 Process Water Impoundment

The PWI shall be used to store neutralized solutions and resulting sediments, and direct precipitation.

2.3.3 Run-off Pond

The Runoff Pond shall be used to capture direct precipitation; stormwater runoff from roofs on-site structures, cathode storage slab, and concrete apron on the south side of the SX/EW building; fire sprinkler water or process solutions that may enter or overflow the SX/EW Building floor sump; any

spills or wash down from these areas; and process upset events.

2.4 Point(s) of Compliance [A.R.S. § 49-244]

The Points of Compliance (POC) are listed in Table below. Monitoring shall be conducted at each Point of Compliance (POC) as listed in Section 4.1, Table 4.1-6 and 4.1-7

GROUNDWATER MONITORING POINTS OF COMPLIANCE						
POC #	**ADWR No.**	**Total Depth (ft. bgs)**	**Latitude**	**Longitude**	**Screened Interval (ft. bgs)**	**Aquifer Unit**
POCs for In-Situ Well Filed						
M14-GL	55-549172	859	33° 03' 4.0"N	111° 26' 15.77"W	778-838	LBFU
M15-GU	55-547813	615	33° 03' 4.04"N	111° 26' 16.40"W	554-594	LBFU
M22-O	55-555831	1,140	33° 03' 4.53"N	111° 26' 15.76"W	932-1,130	Oxide
M23-UBF	55-555824	250	33° 03' 4.51"N	111° 26' 16.50"W	210-250	UBFU
M54-LBF	TBD	TBD	TBD	TBD	500-640	LBFU
M54-O	TBD	TBD	TBD	TBD	660-1,200	Oxide
POCs for Impoundments						
M52-UBF	TBD	276	TBD	TBD	200-275	UBFU

Note: TBD - to be determined. The monitoring well location and construction details are proposed, pending final installation of the wells. The wells are to be installed in accordance with the Compliance Schedule, Section 3.0.

The Director may amend this permit to designate additional POCs, if information on groundwater gradients or groundwater usage indicates the need.

2.4.1 New Well Design and Installation

The permittee shall submit design specification for any other wells that may be installed or modified for ADEQ's prior review and approval. The wells shall be designed with appropriate surface seals, annular seals to prevent cross contamination, plugs above the filter pack to prevent cement grout intrusion into the filter pack and screen, and filter pack and screen size selected for the lithology of the screened interval.

All new wells shall be developed after installation and allowed to recover at least one week prior to collection of an initial groundwater sample.

2.4.1.1 Well Installation Report

A well installation report shall be submitted to ADEQ within 60 days after the completion of the well(s) installation in accordance with Section 3.0. The well installation report shall be completed in accordance with A.A.C. R12-15-801 et seq. and consist of the following

- Copies of ADWR Notice of Intent (NOI) and all related submittals to ADWR;
- Boring log and well as-built diagram;
- Total depth of well measured after installation;
- Top of well casing or sounding tube (whichever is used as the fixed reference measuring point) and ground surface elevation;
- Depth to static groundwater;
- Geophysical logging reports and subsurface sampling results, if any;
- Description of well drilling method;
- Description of well development method;
- If dedicated sampling equipment installed, details on the equipment and at what depth the equipment was installed;

- Summary of analytical results for initial groundwater sample collected after installation;
- Corresponding analytical data sheets; and
- Global Positioning System (GPS) coordinates for each new well.

2.4.1.2 Replacement Wells

In the event that a well other than a POC well should become unusable or inaccessible due to damage, a significant decrease and/or increase in water level, or any other event, the replacement well(s) shall be approved by ADEQ.

2.5 Monitoring Requirements [A.R.S. § 49-243(B) and (K)(1), A.A.C. R18-9-A206(A)]

All monitoring required in this permit shall continue for the duration of the permit, regardless of the status of the facility. Monitoring shall commence the first full monitoring period following permit effective date or at a frequency specified by the permit. All sampling, preservation and holding times shall be in accordance with currently accepted standards of professional practice. Trip blanks, equipment blanks and duplicate samples shall also be obtained, and Chain-of-Custody procedures shall be followed, in accordance with currently accepted standards of professional practice. Copies of laboratory analyses and Chain-of-Custody forms shall be maintained at the permitted facility. Upon request, these documents shall be made immediately available for review by ADEQ personnel.

2.5.1 Discharge Monitoring

Discharge monitoring shall be conducted on a one time basis at the PLS Tank, Raffinate Tank, Process Water Impoundment and Runoff Pond in accordance with Section 4.1, Table 4.1-2A, and the Compliance Schedule in Section 3.0, within 90-120 days of initial PTF start-up in order to allow for accurate representation of process solutions. Discharge monitoring of the underground workings shall be conducted at the location identified in Section 4.1, Table 4.1-2B and in accordance with the Compliance Schedule, Section 3.0. The underground workings shall be depth specific sampled before the PTF operations begin, during the injection phase at least sixth months into the mining phase, one month after the mining has ceased, one month after the rinsing phase, and into the closure and post closure monitoring period. Discharge Monitoring Sampling Parameters are listed in Section 4.1, Table 4.1-2C. Results of the discharge monitoring shall be submitted to the GWS within 30 days from receipt of the laboratory analytical results.

2.5.2 Facility / Operational Monitoring

Facility-specific operational monitoring requirements are listed in Section 4.1, Table 4.1-3.

2.5.3 Groundwater Monitoring and Sampling Protocols

Static water levels shall be measured and recorded prior to sampling. Wells shall be purged of at least three borehole volumes (as calculated using the static water level) or until field parameters (pH, temperature, and conductivity) are stable, whichever represents the greater volume. If evacuation results in the well going dry, the well shall be allowed to recover to 80 percent of the original borehole volume, or for 24 hours, whichever is shorter, prior to sampling. If after 24 hours there is not sufficient water for sampling, the well shall be recorded as "dry" for the monitoring event. An explanation for reduced pumping volumes, a record of the volume pumped, and modified sampling procedures shall be reported and submitted with the Self-Monitoring Report Form (SMRF).

As an alternative method for sampling, the permittee may conduct the sampling using the low-flow purging method described in the Arizona Water Resources Center March 1995 Field Manual for Water Quality Sampling. Under this method, the well must be purged until at least two indicator parameters stabilize. Indicator parameters shall include dissolved oxygen, turbidity, pH, temperature and conductivity.

2.5.3.1 POC Well Installation

Groundwater monitor wells must be installed at POC locations M54-LBF, M54-O and M52-UBF in accordance with the Compliance Schedule, Section 3.0.

2.5.3.2 Ambient Groundwater Monitoring

Eight (8) rounds of groundwater sampling are required to establish ambient groundwater quality at POC wells M54-LBF, M54-O and M52-UBF and any other additional POCs required to be installed as part of the Compliance Schedule (Section 3.0). Each ambient sample shall be analyzed for the parameters listed in Section 4.1, Table 4.1-5. Alert levels and aquifer quality limits shall be established as required in Sections 2.5.3.2.1 and 2.5.3.2.2.

2.5.3.2.1 Alert Levels for POC Wells

ALs for POC wells will be calculated for all parameters with an established AWQS and for the other sampling parameters listed as "reserved" in Section 4.1, Table 4.1-6 and Table 4.1-7 within 30 days of receipt of the laboratory analyses for the final sampling round of the ambient groundwater monitoring period for each POC well list in Section 2.4. The permittee shall submit the ambient groundwater monitoring data in tabulated form to the ADEQ Groundwater Section (GWS) for review. Copies of all laboratory analytical reports, field notes, and the Quality Assurance/Quality Control (QA/QC) procedures used in the collection and analyses of the samples for all parameters listed in Section 4.1, Tables 4.1-6 and 4.1-7 shall be submitted to the GWS. The permittee may submit a report with the calculations for each AQL and AL included in the permit for review and approval by ADEQ, or the permittee may defer calculation of the AQLs and ALs to the GWS. The AQLs and ALs shall be established and calculated by the following formula or another valid statistical method submitted to GWS in writing and approved for this permit by the GWS:

$$AL = M + KS$$

Where M = mean, S= standard deviation, and K = one-sided normal tolerance interval with a 95% confidence level (Lieberman, G.J. (1958) Tables for One-sided Statistical Tolerance Limits: Industrial Quality Control, Vol. XIV, No. 10). Obvious outliers should be excluded from the data used in the AL calculation.

The following criteria shall be met in establishing ALs in the permit for constituents with an AWQS:

1. The AL shall be calculated for a parameter using the analyses from a minimum of eight (8) consecutive sample rounds. The permittee shall not use more than eight (8) sample rounds in the calculation.
2. Any data where the practical quantification limit (PQL) exceeds 80% of the AWQS shall not be included in the AL calculation.
3. If a parameter is below the detection limit, the permittee must report the value as "less than" the numeric value for the PQL or detection limit for the parameter, not just as "non-detect". For those parameters, the permittee shall use a value of one-half the reported detection limit for the AL calculation.
4. If the analytical results from more than 50% of the samples for a specific parameter are non-detect, then the AL shall be set at 80% of the AWQS.
5. If the calculated AL for a specific constituent and well is less than 80% of the AWQS, the AL shall be set at 80% of the AWQS for that constituent in that well.

The following criteria shall be met in establishing ALs in the permit for constituents without an AWQS:

1. The AL shall be calculated for a parameter using the analyses from a minimum of eight (8) consecutive sample rounds. The permittee shall not use more than eight (8)

sample rounds in the calculation.

2. If a parameter is below the detection limit, the permittee must report the value as "less than" the numeric value for the PQL or detection limit for the parameter, not just as "non-detect". For those parameters, the permittee shall use a value of one-half the reported detection limit for the AL calculation.

2.5.3.2.2 Aquifer Quality Limits for POC Wells

AQLs for POC wells will be calculated for each of the analytes for which a numeric AWQS has been adopted within 30 days of receipt of the laboratory analyses for the final sampling round of the ambient groundwater monitoring period for each POC well list in Section 2.4. For each of the monitored analytes for which a numeric AWQS has been adopted, the AQL shall be established as follows:

1. If the calculated AL is less than the AWQS, then the AQL shall be set equal to the AWQS.
2. If the calculated AL is greater than the AWQS, then the AQL shall be set equal to the calculated AL value, and no AL shall be set for that constituent at that monitoring point.

2.5.3.3 Quarterly Compliance Monitoring

The permittee shall perform quarterly compliance monitoring of the POC wells as specified in Section 4.1, Table 4.1-6. The results of the monitoring shall be compared to the AQLs and ALs.

The permittee shall submit reports of the quarterly compliance monitoring in accordance with the reporting schedule at Section 2.7.6.

2.5.3.4 Semi-Annual Compliance Monitoring

The permittee shall perform semi-annual compliance monitoring of the POC wells as specified in Section 4.1, Table 4.1-7. The results of the monitoring shall be compared to the AQLs and ALs.

The permittee shall submit reports of the semi-annual compliance monitoring in accordance with the reporting schedule at Section 2.7.6.

2.5.3.5 Point of Compliance Well Replacement

In the event that one or more of the designated POC wells should become unusable or inaccessible due to damage, or any other event, a replacement POC well shall be constructed and installed upon approval by ADEQ. If the replacement well is 50 feet or less from the original well, the ALs and/or AQLs calculated for the designated POC well shall apply to the replacement well.

2.5.4 Surface Water Monitoring and Sampling Protocols

Not applicable to this permit.

2.5.5 Analytical Methodology

All samples collected for compliance monitoring and soil sampling shall be analyzed using Arizona state-approved methods. If no state-approved method exists, then any appropriate EPA-approved method shall be used. Regardless of the method used, the detection limits must be sufficient to determine compliance with the regulatory limits of the parameters specified in this permit. Analyses shall be performed by a laboratory licensed by the Arizona Department of Health Services, Office of Laboratory Licensure and Certification. For results to be considered valid, all analytical work shall meet quality control standards specified in the approved methods. A list of Arizona state-certified laboratories can be obtained at the address below:

Arizona Department of Health Services
Office of Laboratory Licensure and Certification
250 North 17th Avenue
Phoenix, AZ 85007
Phone: (602) 364-0720

2.5.6 Installation and Maintenance of Monitoring Equipment

Monitoring equipment required by this permit shall be installed and maintained so that representative samples required by the permit can be collected. If new groundwater wells are determined to be necessary, the construction details shall be submitted to the ADEQ Groundwater Section for approval prior to installation and the permit shall be amended to include any new monitoring points.

2.5.7 Protection of Downgradient Uses - Arsenic

For purposes of this permit, ADEQ has established a use protection level (UPL) for arsenic of 0.01 milligrams per liter (mg/L), consistent with EPA's primary drinking water standard for arsenic. The northwest corner of the State Mineral Lease Land, on which the PTF shall be located, has been conservatively designated as the downgradient point at which the arsenic UPL will be applied. Consistent with ADEQ's substantive policy statement titled "Using Narrative Aquifer Water Quality Standards to Develop Permit Conditions for Aquifer Protection Permits" (Oct. 2003), an alert level for arsenic shall be established for each of the POC wells M14-GL, M15-GU, M22-O, M23-UBF, M54-LBF, and M54-O for the in-situ well field through consideration of fate and transport of arsenic in groundwater to ensure that the UPL is not exceeded at the northwest corner of the State Mineral Lease Land (See Compliance Schedule, Section 3.0).

2.5.8 Monitoring Well

Monitoring well MW-01 shall be installed and approved by ADEQ in accordance with the Compliance Schedule, Section 3.0. Monitoring well MW-01 shall be located in the down gradient groundwater direction at or near the PTF well field boundary. The placement of MW-01 shall be sufficiently located to measure changes in chemical groundwater concentrations emanating from the injection zones within the effective time frames of the Temporary APP. MW-01 shall be a nested well screened separately across each proposed injection zone targeted for in-situ leaching, and potentially into the LBFU. MW-01 shall be analyzed one month prior to the pilot test start-up and one month after the rinsing phase for parameters listed in Table 4.1-5. MW-01 shall be monitored monthly for the duration of the pilot test for pH, sulfate and total dissolved solids (TDS). The groundwater data collected for this well shall be summarized and submitted as part of the Quarterly Reporting Requirement listed in Section 2.7.4.4.

GROUNDWATER MONITORING WELL						
Well #	**ADWR No.**	**Total Depth (ft. bgs)**	**Latitude**	**Longitude**	**Screened Interval (ft. bgs)**	**Aquifer Unit**
MW-01	TBD	TBD	TBD	TBD	TBD	Oxide (may include LBFU)

2.6 Contingency Plan Requirements
[A.R.S. § 49-243(K)(3), (K)(7) and A.A.C. R18-9-A204 and R18-9-A205]

2.6.1 General Contingency Plan Requirements

At least one copy of this permit and the approved contingency and emergency response plans submitted in the application shall be maintained at the location where day-to-day decisions regarding the operation of the facility are made. The permittee shall be aware of and follow the contingency and

emergency plans.

Any AL that is exceeded or any violation of an AQL, discharge limit (DL), or other permit condition shall be reported to ADEQ following the reporting requirements in Section 2.7.3.

Some contingency actions may involve verification sampling. Verification sampling shall consist of the first follow-up sample collected from a location that previously indicated a violation or the exceedance of an AL. Collection and analysis of the verification sample shall use the same protocols and test methods to analyze for the pollutant or pollutants that exceeded an AL or violated an AQL. The permittee is subject to enforcement action for the failure to comply with any contingency actions in this permit. Where verification sampling is specified in this permit, it is the option of the permittee to perform such sampling. If verification sampling is not conducted within the timeframe allotted, ADEQ and the permittee shall presume the initial sampling result to be confirmed as if verification sampling has been conducted. The permittee is responsible for compliance with contingency plans relating to the exceedance of an AL or violation of a DL, AQL or any other permit condition.

2.6.2 Exceeding of Alert Levels

2.6.2.1 Exceeding of Alert Levels Set for Operational Conditions

1. If an Operational Conditions for BADCT in Section 4.1, Table 4.1-3 has been exceeded, the permittee shall:
   a. Notify the ADEQ Water Quality Compliance Section within five (5) days of becoming aware of a violation of any permit condition in accordance with Section 2.7.3 (Permit Violation and Alert Level Reporting), unless other reporting is specified in Section 4.1, Table 4.1-3.
   b. Submit a written report within thirty (30) days after becoming aware of a violation of a permit condition in accordance with Section 2.7.3. The report shall document all of the following:
      i. a description of the exceeded value or performance standard and its cause;
      ii. the period of violation, including exact date(s) and time(s), if known, and the anticipated time period during which the violation is expected to continue;
      iii. any action taken or planned to mitigate the effects of the violation, or the spill, or to eliminate or prevent recurrence of the violation;
      iv. any monitoring activity or other information which indicates that any pollutants would be reasonably expected to cause a violation of an Aquifer Water Quality Standard; and
      v. any malfunction or failure of pollution control devices or other equipment or process.
2. The facility is no longer on alert status once the operational indicator no longer indicates that an Operational Condition is being exceeded. The permittee shall, however, complete all tasks necessary to return the facility to its pre-alert operating condition.

2.6.2.2 Exceedance of Alert Level #1 for Normal Liner Leakage

If an Alert Level #1 (AL #1) as specified in Section 4.1, Table 4.1-4, has been exceeded, the permittee shall take the following actions:

1. Within 5 days of discovery, determine if the fluid in the collection sump is operational/process water from the impoundment by measuring the pH and conductivity of fluids in the impoundment and in the sump to allow direct comparison in wastewater quality. Notify ADEQ Water Quality Compliance Section in accordance with Section 2.7.3(1) (Permit Violation and AL Status Reporting), and include in the notification an assessment of the type of water in the sump. Monitor fluid removal from the LCRS on a daily basis until the daily volume of fluid quantified remains below AL#1 for 30 days in order to minimize the hydraulic head on the lower liner.
2. Within 15 days of discovery, assess the condition of the liner system using visual

methods for visible portions of the liner, electrical leak detection, or other methods as applicable to determine the location of leaks in the primary liner. If liner damage is evident, the permittee shall complete liner repairs and submit documentation of the repairs in the initial report discussed in Item No. 3 below.

3. Within 30 days of discovery of exceeding AL#1, the permittee shall submit an initial report to ADEQ Water Quality Compliance Section to address problems identified from the initial assessment of the liner system, the source of the fluid, and any remedial actions taken to minimize the future occurrences. The report shall include the results of the initial liner evaluation, methods used to locate the leak(s) if applicable, any repair procedures implemented to restore the liner to optimal operational status if required, and other information necessary to ensure the future occurrence of the incidence will be minimized. The permittee shall also submit the report required under Section 2.7.3.
4. For leakage rates that continue to exceed AL #1 and are below AL #2, a Liner Leakage Assessment Report shall be included in the next annual report described in Section 2.7.4 (Operational, Other or miscellaneous Reporting) of this permit. The permittee may also submit the Liner Leakage Assessment Report to the ADEQ prior to the annual report due date. This Liner Leakage Assessment Report shall be submitted to both the ADEQ Water Quality Compliance Section and the ADEQ Groundwater Section.

   ADEQ will review the Liner Leakage Assessment Report and may require that the permittee take additional action to address the problems identified from the assessment of the liner and perform other applicable repair procedures as directed by the ADEQ, including repair of the liner or addressing and controlling infiltration of non-operational water detected in the LCRS.

2.6.2.3 Exceedance of Alert Level #2 (Discharge Limit) for Liner Failure or Rips

If the Liner Leakage Discharge Limit (AL #2) specified in Section 4.1, Table 4.1-4, has been exceeded, the permittee shall:

1. Immediately cease all discharge to the impoundment, and notify ADEQ's Water Quality Compliance Section orally, electronically, or, by facsimile, of the AL #2 exceedance. Within 24 hours, determine if water in the collection sump is operational/process water from the impoundment by measuring the pH and conductivity of fluids contained in the impoundment and in the sump to allow direct comparison in water quality.
2. Within 5 days of discovery, notify ADEQ Water Quality Compliance Section, in accordance with Section 2.7.3 (Permit Violation and AL Status Reporting) and include an assessment regarding the type of water in the sump based upon the measurements taken according to Item No. 1 listed above.
3. Within 15 days of discovery identify the location of the leak(s) using visual methods, electrical leak detection, or other methods as applicable. If liner damage is evident, the permittee shall complete liner repairs and submit documentation of the repairs in Item No. 4 below. Discharge to the impoundment shall not be re-initiated until the leak(s) have been identified and repaired.
4. Within 30 days of exceeding AL #2, submit a report to ADEQ as specified in Section 2.7.3 (Permit Violation and AL Status Reporting). The report shall include the results of the initial liner evaluation, methods used to locate the leak(s) if applicable, any repair procedures and quality assurance/quality control implemented to restore the liner to optimal operational status if required, and other information necessary to ensure the future occurrence of the incidence will be minimized. Upon review of the report, ADEQ may request additional monitoring or remedial actions.
5. If AL #2 continues to be exceeded following completion of repairs, submit for approval to ADEQ, a corrective action plan including a schedule to complete the corrective actions to address all problems identified from the assessment of the liner

system and surface releases, if any, within 60 days of completion of repairs conducted in response to Item No. 3 above. Upon ADEQ's approval, the permittee shall implement the approved plan and schedule of corrective actions.

6. Within 30 days of completion of corrective actions, submit to ADEQ, a written report as specified in Section 2.6.6 (Corrective Actions).

2.6.2.4 Exceeding of Alert Levels in Groundwater Monitoring

2.6.2.4.1 Alert Levels for Indicator Parameters

1. If an AL in Section 4.1 Table 4.1-6 or Table 4.1-7 been exceeded, the permittee shall request that the laboratory verify the sample results within 5 days. If the analysis does not confirm that an exceedance has occurred, the permittee may assume there has been no exceedance and no further action is required.
2. Within 5 days after receiving laboratory confirmation of an AL being exceeded, the permittee shall notify the ADEQ Water Quality Compliance Section and submit written confirmation within 30 days of receiving the laboratory confirmation of an AL exceedance.
3. If the results indicate an exceedance of an AL, the permittee shall conduct a verification sample of groundwater from the well within 15 days from laboratory confirmation. If the verification sample does not confirm that an exceedance has occurred, the permittee shall notify ADEQ Water Quality Compliance Section of the results and assume there has been no exceedance. No further action is required under this subsection.
4. If verification sampling confirms that the AL has been exceeded, the permittee shall increase the frequency of monitoring to monthly and analyze for the entire list of parameters listed in Section 4.1, Table 4.1-7. In addition, the permittee shall immediately investigate the cause of the exceedance and report the results of the investigation with the 30 day confirmation noted above. ADEQ may require additional investigations, the installation of additional wells or corrective action in response to the report. The permittee shall continue monthly testing for the parameter(s) until the parameter(s) has remained below the AL for three consecutive monthly sampling events.

2.6.2.4.2 Alert Levels for Pollutants with Numeric Aquifer Water Quality Standards

1. If an AL for a pollutant set in Section 4.1, Table 4.1-6 and Table 4.1-7 has been exceeded, the permittee may conduct verification sampling within 5 days of becoming aware of an AL exceedance. The permittee may use the results of another sample taken between the date of the last sampling event and the date of receiving the result as verification.
2. If verification sampling confirms the AL exceedance or if the permittee opts not to perform verification sampling, then the permittee shall increase the frequency of monitoring to monthly In addition, the permittee shall immediately initiate an investigation of the cause of the AL exceedance, including inspection of all discharging facilities and all related pollution control devices, review of any operational and maintenance practices that might have resulted in an unexpected discharge, and hydrologic review of groundwater conditions including upgradient water quality from existing wells.
3. The permittee shall initiate actions identified in the approved contingency

plan referenced in Section 3.0 and specific contingency measures identified in Section 2.6 to resolve any problems identified by the investigation which may have led to an AL exceedance. To implement any other corrective action the permittee shall obtain prior approval from ADEQ according to Section 2.6.6. Alternatively, the permittee may submit a technical demonstration, subject to written approval by the Groundwater Section, that although an AL is exceeded, pollutants are not reasonably expected to cause a violation of an AQL. The demonstration may propose a revised AL or monitoring frequency for approval in writing by the Groundwater Section.

4. Within 30 days after confirmation of an AL exceedance, the permittee shall submit the laboratory results to the Water Quality Compliance Section along with a summary of the findings of the investigation, the cause of the AL exceedance, and actions taken to resolve the problem.
5. Upon review of the submitted report, the Department may amend the permit to require additional monitoring, increased frequency of monitoring, or other actions.
6. The increased monitoring required as a result of an AL exceedance may be reduced to the regularly scheduled frequency, if the results of three (3) sequential sampling events demonstrate that no parameters exceed the AL.
7. If the increased monitoring required as a result of an AL exceedance continues for more than six (6) sequential sampling events, the permittee shall submit a second report documenting an investigation of the continued AL exceedance within 30 days of the receipt of laboratory results of the sixth sampling event.

2.6.2.4.3 Alert Levels to Protect Downgradient Users from Pollutants Using a Narrative Aquifer Water Quality Standard

1. If an AL set for arsenic in Section 4.1, Table 4.1-6 or 4.1-7 has been exceeded, the permittee shall conduct verification sampling within 5 days of becoming aware of an AL exceedance.
2. If verification sampling confirms that the AL has been exceeded, the permittee shall investigate the cause of the exceedance and shall submit a report regarding the exceedance to ADEQ within 30 days of the date of verification sample. The report shall identify the cause and source(s) of the exceedance and shall propose actions to mitigate the exceedance. The report shall also present groundwater modeling to establish a projected relationship of the wells in which exceedance(s) were found and the downgradient boundary of the Arizona State Land Department property at the facility.
3. The permittee shall notify all downgradient users of the aquifer who may be directly affected by the discharge within 24 hours of receiving the results of verification confirmation sampling.

2.6.2.5 Exceeding of BADCT Alert Levels for Injection/Recovery Well Operation

The permittee shall initiate the following actions within 24 hours of becoming aware of an Alert Level exceedance listed in Section 4.1 Table 4.1-8 for the loss of hydraulic control within the in-situ leaching area for more than 24 consecutive hours. A loss of hydraulic control occurs when the amount of fluids injected during a 24 hour period exceeds the amount of fluid recovered for the same 24 hour period. Loss of hydraulic control is also indicated by a flat or outward gradient observed in any pair of observation and recovery wells over a 24 hour period. The permittee shall:

1. Notify the ADEQ Water Quality Compliance Section within one (1) day of becoming aware of the alert level exceedance.

2. Adjust flow rates at injection/recovery wells until the recovery volume is greater than the injected volume,
3. Conduct an inspection, testing of piping, and wellhead for leaks; injection and recovery lines, pumps, flow meters, totalizers, pressure gauges, pressure transducers, and other associated facilities,
4. Review of recent process logs, continuous chart recordings, meter readings, and other operational control information to identify any unusual occurrences,
5. Initiate pressure testing of the appropriate wells if the loss of fluids cannot be determined to be caused by a surface facility failure, and
6. Repair system as necessary.
7. Within one week submit a report to ADEQ Water Quality Compliance Section. The report shall include but not be limited to providing the following information: a) injected volume in the period prior to the alert level exceedance, b) recovered volume in the period prior to the alert level exceedance, c) corrective action taken.
8. The permittee is no longer considered to be in violation if the injection rate and recovery rates are re-established and maintained at normal operating conditions following the completion of the corrective actions.

If the exceedance of the Alert Level is determined to be a result of a planned disruption or power outage, the cause will be noted in the log book as required by Section 2.7.2.

If a leak is detected, operation of the well shall cease until the leak has been repaired and mechanical integrity demonstrated to minimize the potential for groundwater pollution.

Within 30 days of the initial AL exceedance caused by a leak, the permittee shall submit a report to ADEQ GWS at the address shown in Section 2.7.5. This report shall document all submittals to EPA, including but not limited to, monitoring and report data and reports checking engineering and integrity of the well.

The facility is no longer on alert status once the operational indicator no longer indicates that an AL is being exceeded. The permittee shall, however, complete all tasks necessary to return the facility to its pre-alert operating condition.

2.6.2.6 Exceeding of Alert Levels Set for Maximum Injection Pressure

The permittee shall initiate the following actions within 24 hours of becoming aware of an Alert Level exceedance listed in Section 4.1, Table 4.1-8 for the exceedance of a fracture gradient. The permittee shall:

1. Immediately investigate to determine the cause of the AL being exceeded, including:
   a. Inspection, testing, and assessment of the current condition of all components of the injection system that may have contributed to the AL being exceeded, which may include taking the affected well(s) out of service, and
   b. Review of all data logger information, test results, and other operational control information to identify any unusual occurrences.
   c. Repair system as necessary.
2. Within 30 days of an AL being exceeded, the permittee shall submit the related data to the ADEQ Water Quality Compliance Section, along with a summary of the findings of the investigation, the cause of the AL being exceeded, and actions taken to resolve the problem. This report shall document all submittals to EPA, including but not limited to, monitoring and report data and reports checking engineering and integrity of the well.
3. Upon review of the submitted report, the Department may amend the permit to require additional monitoring, increased frequency of monitoring, amendments to

permit conditions or other actions.

4. The facility is no longer on alert status once the operational indicator no longer indicates that an AL is being exceeded. The permittee shall, however, complete all tasks necessary to return the facility to its pre-alert operating condition.

2.6.3 Discharge Limitations Violations

2.6.3.1 Liner Failure, Containment Structure Failure, or Unexpected Loss of Fluid

In the event of overtopping, liner failure, containment structure failure, or unexpected loss of fluid as described in Section 2.3, the permittee shall take the following actions:

1. As soon as practicable, cease all discharges as necessary to prevent any further releases to the environment.
2. Within 24 hours of discovery, notify ADEQ Water Quality Compliance Section, Enforcement Unit, orally, electronically, or by facsimile.
3. Within 24 hours of discovery of a failure that resulted in a release to the subsurface, collect representative samples of the fluid remaining in affected impoundments and drainage structures, analyze sample(s) according to Section 4.1, Table 4.1-2C and report in accordance with Section 2.7.3 (Permit Violation and AL Status Reporting). In the 30-day report required under Section 2.7.3, include a copy of the analytical results and forward the report to ADEQ Water Quality Compliance Section, Enforcement Unit and Groundwater Section.
4. Within 15 days of discovery, initiate an evaluation to determine the cause for the incident. Identify the circumstances that resulted in the failure and assess the condition of the discharging facility and liner system. Implement corrective actions as necessary to resolve the problems identified in the evaluation. Initiate repairs to any failed liner, system, structure, or other component as needed to restore proper functioning of the discharging facility. The permittee shall not resume discharging to the discharging facility until repairs of any failed liner or structure are performed. Repair procedures, methods, and materials used to restore the system(s) to proper operating condition shall be described in the facility log/recordkeeping file and available for ADEQ review.
5. Record in the facility log/recordkeeping file the amount of fluid removed, a description of the removal method, and other disposal arrangements. The facility log/recordkeeping file shall be maintained according to Section 2.7.2 (Operation Inspection / Log/Recordkeeping File).
6. Within 30 days of discovery of the incident, submit a report to ADEQ as specified in Section 2.7.3. Include a description of the actions performed in Subsections 1 through 5 listed above. Upon review of the report, ADEQ may request additional monitoring or remedial actions.
7. Within 60 days of discovery, conduct an assessment of the impacts to the subsoil and/or groundwater resulting from the incident. This assessment may include the installation of POC(s) to determine down-gradient groundwater impact from the incident along with commencement of groundwater monitoring per Section 4.1, Table 4.17. If soil or groundwater is impacted such that it could or did cause or contribute to an exceedance of an AQL at the applicable point of compliance, submit to ADEQ, for approval, a corrective action plan to address such impacts, including identification of remedial actions and a schedule for completion of activities. At the approval of ADEQ, the permittee shall implement the approved plan.
8. Within 30 days of completion of corrective actions, submit to ADEQ, a written report as specified in Section 2.6.6 (Corrective Actions).
9. Upon review of the report, ADEQ may amend the permit to require additional monitoring, increased frequency of monitoring, amendments to permit conditions, or other actions.

2.6.3.2 Overtopping of a Surface Impoundment

If overtopping of fluid from a permitted surface impoundment occurs, and results in a discharge pursuant to A.R.S. § 49-201(12), the permittee shall:

1. As soon as practicable, cease all discharges to the surface impoundment to prevent any further releases to the environment.
2. Within 24 hours of discovery, notify ADEQ Water Quality Compliance Section, Enforcement Unit.
3. Within 24 hours, collect representative samples of the fluid contained in the surface impoundment. Samples shall be analyzed for the parameters specified in Section 4.1, Table 4.1-2C. Within 30 days of the incident, submit a copy of the analytical results to ADEQ Water Quality Compliance Section, Enforcement Unit.
4. As soon as practicable, remove and properly dispose of excess water in the impoundment until the water level is restored at or below the appropriate freeboard as described in Section 4.1, Table 4.1-3. Record in the facility log, the amount of fluid removed, a description of the removal method, and the disposal arrangements. The facility log/recordkeeping file shall be maintained according to Section 2.7.2 (Operation Inspection/LogBook/Recordkeeping File).
5. Within 30 days of discovery, evaluate the cause of the overtopping and identify the circumstances that resulted in the incident. Implement corrective actions and adjust operational conditions as necessary to resolve the problems identified in the evaluation. Repair any systems as necessary to prevent future occurrences of overtopping.
6. Within 30 days of discovery of overtopping, submit a report to ADEQ as specified in Section 2.7.3.2 (Permit Violation and Alert Level Status Reporting). Include a description of the actions performed in Subsections 1 through 5 listed above. Upon review of the report, ADEQ may request additional monitoring or remedial actions.
7. Within 60 days of discovery, and based on sampling in Subsection 3 above, conduct an assessment of the impacts to the subsoil and/or groundwater resulting from the incident.
8. If soil or groundwater is impacted such that it could cause or contribute to an exceedance of an AQL at the applicable point of compliance, submit to ADEQ for approval, a corrective action plan to address such impacts, including identification of remedial actions and/or monitoring, and a schedule for completion of activities. At the direction of ADEQ, the permittee shall implement the approved plan.
9. Within 30 days of completion of corrective actions, submit to ADEQ, a written report as specified in Section 2.6.6 (Corrective Actions). Upon review of the report, ADEQ may amend the permit to require additional monitoring, increased frequency of monitoring, amendments to permit conditions, or other actions.

2.6.3.3 Inflows of Unexpected Materials to a Surface Impoundment

The types of materials that are expected to be placed in the permitted surface impoundments are specified in Section 2.3 (Discharge Limitations). If any unexpected materials flow to a permitted surface impoundment, the permittee shall:

1. As soon as practicable, cease all unexpected inflows to the surface impoundment(s).
2. Within 24-hours of discovery, notify ADEQ Water Quality Compliance Section, Enforcement Unit.
3. Within five (5) days of the incident, identify the source of the material and determine the cause for the inflow. Characterize the unexpected material and contents of the affected impoundment, and evaluate the volume and concentration of the material to determine if it is compatible with the surface impoundment liner. Based on the evaluation of the incident, repair any systems or equipment and/or adjust operations, as necessary to prevent future occurrences of inflows of unexpected materials.
4. Within 30 days of an inflow of unexpected materials, submit a report to ADEQ as specified in Section 2.7.3.2 (Permit Violation and Alert Level Status Reporting).

Include a description of the actions performed in Subsections 1 through 3 listed above.

5. Upon review of the report, ADEQ may amend the permit to require additional monitoring, increased frequency of monitoring, amendments to permit conditions, or other actions including remediation.

2.6.3.4 Unexpected Loss of Fluid in the Injection/Recovery Wells at the PTF

In the event of an unexpected loss of fluid in the injection/recovery wells, such that fluids are released to the surface, vadose zone, or groundwater, the permittee shall:

1. Within two hours of discovery cease injection in the affected area and/or adjust flow rates at injection/recovery wells until an inward hydraulic gradient is reestablished and excess ISCR solutions are recovered necessary to prevent further releases to the environment,
2. Operate the recovery wells in the affected area until the amount of fluid recovered is in excess of the amount of fluid injected during the 24 hour period,
3. Within 24 hours of discovery, notify ADEQ Water Quality Compliance Section.
4. Inspect relevant components such as injection, recovery lines, pumps, flow meters, flow totalizers, pressure gauges, pressure transducers and other associated facilities,
5. Verify proper operations of all facilities within the in-situ leach area,
6. Within 24 hours of discovery, initiate an evaluation to determine the cause for the incident. Identify the circumstances that resulted in the failure and assess the condition of the well. Implement corrective actions as necessary to resolve the problems identified in the evaluation. Initiate repairs to any system, structure, or other component as needed to restore proper functioning of the well. The permittee shall not resume injecting or discharging until repairs of any failed structure are performed and tested as applicable. Repair procedures, methods, and materials used to restore the system(s) to proper operating condition shall be described in the facility log/recordkeeping file and available for ADEQ review. The facility log/recordkeeping file shall be maintained according to Section 2.7.2 (Operation Inspection / Log/Recordkeeping File).
7. Submit a written report within thirty days to ADEQ as specified in Section 2.7.3 (Permit Violation and AL Status Reporting) describing the incident and the corrective actions taken. Upon review of the report, the Department may require an amendment to the permit to require surface, vadose zone or groundwater monitoring, require installation of additional POCs, increased frequency of monitoring, remedial actions, amendments to permit conditions or other actions.
8. Within 30 days of discovery, conduct an assessment of the impacts to the surface, vadose zone and/or groundwater resulting from the incident. If soil or groundwater is impacted, submit to ADEQ, for approval, a corrective action plan to address such impacts, including identification of remedial actions and/or monitoring, and a schedule for completion of activities. The corrective action plan shall be submitted within sixty days of the incident. At the direction of ADEQ, the permittee shall implement the approved plan.

2.6.4 Aquifer Quality Limit Violation

1. If an AQL for a pollutant specified in Section 4.1, Table 4.1-6 and Table 4.1-7, is exceeded in a POC Well, the permittee may conduct verification sampling no later than five (5) days after learning of the violation. If verification sampling does not verify the violation, then the initial violation shall be reported in the Quarterly Monitoring and Compliance Report and no further action shall be required of the permittee for that event.
2. If verification sampling confirms the violation, or if the permittee opts not to perform verification sampling, then the permittee shall:
   a. Notify ADEQ within five (5) days after confirming or learning of the violation, in accordance with Section 2.7.3;

b. Immediately initiate: (1) a BADCT systems evaluation for the cause of the violation, including an inspection of all facilities regulated under this permit and corresponding pollution control devices, and a review of any operational or maintenance practices that might have resulted in an unexpected discharge; and (2) a hydrogeologic assessment of the violation, including groundwater modeling, review of groundwater conditions and upgradient water quality, groundwater contours, and an inventory of downgradient well users and types of uses;
c. Increase the frequency of monitoring at the location of the violation to monthly;
d. Submit a written report based on the investigation within thirty (30) days after becoming aware of the violation, in accordance with Section 2.7.3; and
e. Take actions that may be necessary as a result of the violation under Section 2.6.5.

3. As part of its written report, the permittee may include a technical demonstration that the violation was not caused or contributed to by pollutants discharged from a facility regulated under this APP.
4. Based on the written report, ADEQ may, if necessary: (1) amend the permit to require increased frequency of monitoring or additional monitoring; and (2) authorize corrective action including measures to control the source of a discharge causing the violation (including BADCT correction if necessary); remediate affected soils, surface water or groundwater; and mitigate the impact of the violation on existing uses of the aquifer. ADEQ's corrective action authorization may be in the form of an approval under Section 2.6.6, an amendment of this permit or approval of a contingency plan.
5. If the violation continues for sixty (60) days, then the permittee shall notify downgradient or downstream users who may be directly affected by the violation.
6. If the violation continues for ninety (90) days, then the permittee shall prepare and submit for ADEQ approval a hydrogeologic investigation work plan within thirty (30) after receiving the laboratory results of the third sampling event. The work plan shall assess whether the violation is due to natural or anthropogenic causes and, if exceeded values are found to be related to APP-regulated facilities within the mine site or results are inconclusive, the nature and extent of the discharge. This hydrogeologic investigation shall become the basis of adjusting permit conditions and/or designing corrective action.

2.6.5 Emergency Response and Contingency Requirements for Unauthorized Discharges pursuant to A.R.S. §49-201(12) and pursuant to A.R.S. § 49-241

2.6.5.1 Duty to Respond

The permittee shall act immediately to correct any condition resulting from a discharge pursuant to A.R.S. § 49-201(12) if that condition could pose an imminent and substantial endangerment to public health or the environment.

2.6.5.2 Discharge of Hazardous Substances or Toxic Pollutants

In the event of any unauthorized discharge pursuant to A.R.S. § 49-201(12) of suspected hazardous substances (A.R.S. § 49-201(19)) or toxic pollutants (A.R.S. § 49-243(I)) on the facility site, the permittee shall promptly isolate the area and attempt to identify the discharged material. The permittee shall record information, including name, nature of exposure and follow-up medical treatment, if necessary, on persons who may have been exposed during the incident. The permittee shall notify the ADEQ Water Quality Compliance Section within 24 hours upon discovering the discharge of hazardous material which (a) has the potential to cause an AWQS or AQL to be exceeded, or (b) could pose an endangerment to public health or the environment.

2.6.5.3 Discharge of Non-hazardous Materials

In the event of any unauthorized discharge pursuant to A.R.S. § 49-201(12) of non-hazardous materials from the facility, the permittee shall promptly attempt to cease the discharge and isolate the discharged material. Discharged material shall be removed and the site cleaned up

as soon as possible. The permittee shall notify the ADEQ Water Quality Compliance Section within 24 hours upon discovering the discharge of non-hazardous material which (a) has the potential to cause an AQL to be exceeded, or (b) could pose an endangerment to public health or the environment.

2.6.5.4 Reporting Requirements

The permittee shall submit a written report for any unauthorized discharges reported under Sections 2.6.5.2 and 2.6.5.3 to ADEQ Water Quality Compliance Section within 30 days of the discharge or as required by subsequent ADEQ action. The report shall summarize the event, including any human exposure, and facility response activities and include all information specified in Section 2.7.3. If a notice is issued by ADEQ subsequent to the discharge notification, any additional information requested in the notice shall also be submitted within the time frame specified in that notice. Upon review of the submitted report, ADEQ may require additional monitoring or corrective actions.

2.6.6 Corrective Actions

Specific contingency measures identified in Section 2.6 and actions identified in the approved contingency plan to be submitted under the Compliance Schedule Section 3.0 have already been approved by ADEQ and do not require written approval to implement.

With the exception of emergency response actions taken under Section 2.6.5, the permittee shall obtain written approval from the Groundwater Section prior to implementing a corrective action to accomplish any of the following goals in response to exceeding an AL or violation of an AQL, DL, or other permit condition:

1. Control of the source of an unauthorized discharge;
2. Soil cleanup;
3. Cleanup of affected surface waters;
4. Cleanup of affected parts of the aquifer; and/or
5. Mitigation to limit the impact of pollutants on existing uses of the aquifer.

Within 30 days of completion of any corrective action, the permittee shall submit to the ADEQ Water Quality Compliance Section, a written report describing the causes, impacts, and actions taken to resolve the problem.

2.7 Reporting and Recordkeeping Requirements
[A.R.S. § 49-243(K)(2) and A.A.C. R18-9-A206(B) and R18-9-A207]

2.7.1 Self-Monitoring Report Form (SMRFs)

1. The permittee shall complete the SMRFs provided by ADEQ, and submit them to the Water Quality Compliance Section, Data Unit.
2. The permittee shall complete the SMRF to the extent that the information reported may be entered on the form. If no information is required during a reporting period, the permittee shall enter "not required" on the SMRF and submit the report to ADEQ. The permittee shall use the format devised by ADEQ.
3. The tables contained in Section 4.1 list the parameters to be monitored and the frequency for reporting results for compliance monitoring. Monitoring and analytical methods shall be recorded on the SMRFs.
4. In addition to the SMRF, the information contained in A.A.C. R18-9-A206(B)(1) shall be included for exceeding an AL or violation of an AQL, DL, or any other permit condition being reported in the current reporting period.

2.7.2 Operation Inspection / Log Book Recordkeeping

A signed copy of this permit shall be maintained at all times at the location where day-to-day decisions regarding the operation of the facility are made. A log book (paper copies, forms or electronic data) of the inspections and measurements required by this permit shall be maintained at the location where day-to-day decisions are made regarding the operation of the facility. The log book shall be retained for ten years from the date of each inspection, and upon request, the permit and the log book shall be made immediately available for review by ADEQ personnel. The information in the log book shall include, but not be limited to, the following information as applicable:

1. Name of inspector;
2. Date and shift inspection was conducted;
3. Condition of applicable facility components;
4. Any damage or malfunction, and the date and time any repairs were performed;
5. Documentation of sampling date and time;
6. Any other information required by this permit to be entered in the log book; and
7. Monitoring records for each measurement shall comply with R18-9 A206(B)(2).

2.7.3 Permit Violation and Alert Level Status Reporting

1. The permittee shall notify the Water Quality Compliance Section in writing within 5 days (except as provided in Section 2.6.5) of becoming aware of a violation of any permit condition, discharge limitation or of an AL exceedance.
2. The permittee shall submit a written report to the Water Quality Compliance Section within 30 days of becoming aware of the violation of any permit condition or discharge limitation. The report shall document all of the following:
   a. Identification and description of the permit condition for which there has been a violation and a description of its cause;
   b. The period of violation including exact date(s) and time(s), if known, and the anticipated time period during which the violation is expected to continue;
   c. Any corrective action taken or planned to mitigate the effects of the violation, or to eliminate or prevent a recurrence of the violation;
   d. Any monitoring activity or other information which indicates that any pollutants would be reasonably expected to cause a violation of an AWQS;
   e. Changes to the monitoring which include changes in constituents or increased frequency of monitoring; and
   f. Description of any malfunction or failure of pollution control devices or other equipment or processes.

2.7.4 Operational, Other or Miscellaneous Reporting

2.7.4.1 Annual Report

If an Alert Level #1 for Normal Liner Leakage has been exceeded discussed in Section 2.6.2.2, the permittee shall submit an annual report that summarizes the results of the liner assessment. The Liner Leakage Assessment Report shall also include information including but not limited to the following: number and location of holes identified; a table summarizing the AL1 exceedances including the frequency and quantity of fluid removed, and corrective actions taken. The annual report shall be submitted prior to 30 days of expiration of this permit.

2.7.4.2 Ambient Mine Block Concentration Report

Ambient mine block groundwater concentrations are required to be determined in order to establish mine block closure rinsing requirements identified Section 2.9.1. One sample shall be taken from each mine block well in order to establish ambient groundwater concentrations. The permittee shall submit within 30 days of completion of ambient mine

block sampling, the ambient mine block groundwater concentrations.

2.7.4.3 Results of Aquifer Pump Tests Prior to Operation of PTF

The permittee shall submit within 30 days of completion of aquifer pump test and prior to beginning operation of the Pilot Study, the results obtained from the aquifer pump test using wells in and around the PTF in accordance with the Compliance Schedule (Section 3.0). The Aquifer Pump Test Report shall discuss and evaluate the feasibility of the proposed Pilot Test using data obtained from pump tests at the PTF wells. The evaluation shall verify previously calculated aquifer properties such as hydraulic conductivity, transmissivity, groundwater velocity, etc. and the validity of the porous medium assumption used in the groundwater modeling for the oxide unit.

2.7.4.4 PTF Operations and Monitoring Quarterly Reports

The permittee shall submit quarterly reports concerning the operations and monitoring of the PTF during the 14-month mining and 9-month rinsing phase to the ADEQ Groundwater Section (GWS). Quarterly reports shall be submitted no later than 30 days following the end of each calendar quarter. The quarterly report shall demonstrate whether the hydraulic control was maintained at the PTF during the quarterly monitoring period. Hydraulic control shall be demonstrated by, including but not limited to, the following: a continuous inward hydraulic gradient by pumping more solution out than went in, maintaining the fracture gradient, and compliance with ALs and AQLs at the POCs. The report shall include:

1. A graphical representation of the volumes extracted and injected used to maintain hydraulic control. In the event that more solution was injected than recovered for a 24-hour period, or in the event that any of the instruments used to measure the flow volumes malfunction or are out of service for more than 24 consecutive hours, the permittee shall submit a report showing for each day of the quarterly reporting period, the hydraulic gradient was maintained.
2. A graphical representation that a continuous inward hydraulic gradient was maintained using water level elevations in the PTF. The reports shall include a graphical presentation of head comparisons for each pair of observation and recovery wells used to monitor the hydraulic gradient. The report shall also include a figure showing the location and identity of each of the paired wells. In the event any one of the well pairs indicate a flat or outward hydraulic gradient for a 24-hour period, or in the event that any of the instruments used to measure the hydraulic gradient malfunction or are out of service for more than 24 consecutive hours, the permittee shall submit a report showing for each day of the quarterly reporting period, the daily flow into and out of the mine block. Hydraulic control shall also be demonstrated through the submittal of potentiometric groundwater contour maps which depict the monthly minimum, monthly average and monthly maximum inward hydraulic gradient toward the recovery wells (i.e. cone of depression) using groundwater elevations collected at the PTF well field.
3. A summary of pressure transducers readings and fracture gradients readings.
4. A graphical representation of electric conductivity readings from the injection and observation wells.
5. A description of any deviations from standard sampling protocols during the reporting period.
6. A summary of all exceedances of ALs, AQLs, Action Levels, DLs, or operational limits that occurred during the reporting period and provide the contingency actions completed to mitigate the effects of the violation, or to eliminate the recurrence of the exceedance or violation. The report shall also include identification and discussion of any laboratory results that fell outside of the laboratory QA/QC criteria and AQLs and ALs required by this permit.
7. Graphical time versus concentration plots of groundwater elevations, field pH, sulfate, and total dissolved solids since the inception of monitoring at each POC well, and any

parameter which exceeded an applicable AL or AQL in the past three sampling events at each POC well.

8. Groundwater elevation contour maps for each quarterly monitoring period, including the groundwater elevation obtained from the underground workings. The contour maps shall identify, if known, any wells that were pumping within a half-mile radius of the PTF.
9. Results of the discharge characterization of the underground working, if the required sampling event falls within the quarterly reporting period.
10. Fissure inspection summary for the reporting period.
11. An updated table of all monitor wells in the Discharge Impact Area including, but not limited to, location of well, depth of well, depth to water, and water level elevation.
12. A summary of any groundwater monitor wells replaced in the reporting period including, but not limited to, location of well, depth of well, depth to water, water level elevation, and screened interval.
13. Groundwater sampling results for the POCs, and Monitor Wells.
14. Copies of Reports submitted to the EPA as required by the UIC permit, including groundwater monitoring results from wells not covered by this permit.

2.7.4.5 Well Abandonment Reports

If monitor wells associated with this permit are abandoned due to poor performance, casing collapse, or other reasons, or are abandoned at the end of the post-closure period, then within 90 days of completing abandonment, the permittee shall submit a well abandonment report to ADEQ Groundwater Section. Appropriate contents of the report shall be sealed by an Arizona professional geologist or professional engineer, in accordance with Arizona Board of Technical Registration requirements. Well abandonment records shall be provided to ADEQ within 90 days of monitor well abandonment and shall include:

1. Copies of ADWR Notice of Intent to Abandon
2. Copies of ADWR Abandonment Reports
3. A description of the methods used to seal the well casing and the perforated or screened interval of the well; and
4. Global Positioning System (GPS) coordinates of the former well location

2.7.5 Reporting Location

All SMRFs shall be submitted to:
Arizona Department of Environmental Quality
Water Quality Compliance Section, Data Unit
Mail Code: 5415B-1
1110 W. Washington Street
Phoenix, AZ 85007
Phone (602) 771-4513

All documents required by this permit to be submitted to the Water Quality Compliance Section shall be directed to:
Arizona Department of Environmental Quality
Water Quality Compliance Section
Mail Code: 5415B-1
1110 W. Washington Street
Phoenix, AZ 85007
Phone (602) 771-4497

All documents required by this permit to be submitted to the Groundwater Section shall be directed to:

Arizona Department of Environmental Quality
Groundwater Section
Mail Code: 5415B-3
1110 W. Washington Street
Phoenix, AZ 85007
Phone (602) 771-4428

2.7.6 Reporting Deadline
The Quarterly Report required by Section 2.7.4 and the results of monitoring conducted during each quarter is due within 15 days of the end of the 1st quarter and every quarter thereafter. The effective date of the permit shall be used for the purpose of determining the beginning of the 1st quarter to begin monitoring and reporting.

The following table lists the report due dates[1]

Monitoring conducted during:	Quarterly Report due by:
First Quarter: January-March	April 30
Second Quarter/Semi-Annual: April-June	July 30
Third Quarter: July-September	October 30
Fourth Quarter/Annual: October-December	January 30

[1]A post-mark date no later than the due date is considered meeting the due date requirements under this Section.

2.7.7 Changes to Facility Information in Section 1.0
The Groundwater Section and Water Quality Compliance Section shall be notified within 10 days of any change of facility information including Facility Name, Permittee Name, Mailing or Street Address, Facility Contact Person or Emergency Telephone Number.

2.8 Temporary Cessation [A.R.S. § 49-243(K)(8) and A.A.C. R18-9-A209(A)]
The permittee shall give written notice to the Water Quality Compliance Section Office before ceasing operation of the facility for a period of 60 days or greater. The permittee shall take the following measures upon temporary cessation:

Immediately following ADEQ's approval, the permittee shall implement the approved plan. If the permittee intends to permanently cease operation of any facility, the permittee shall submit closure notification, as set forth in Section 2.9 below.

At the time of notification the permittee shall submit for ADEQ approval a plan for maintenance of discharge control systems and for monitoring during the period of temporary cessation. Immediately following ADEQ's approval, the permittee shall implement the approved plan. If necessary, ADEQ shall amend permit conditions to incorporate conditions to address temporary cessation. During the period of temporary cessation, the permittee shall provide written notice to the Water Quality Compliance Section Office of the operational status of the facility every ninety days. If the permittee intends to permanently cease operation of any facility, the permittee shall submit closure notification, as set forth in Section 2.9 below.

2.9 Closure [A.R.S. §§ 49-243(K)(6), 49-252 and A.A.C. R18-9-A209(B)]
For a facility addressed under this permit, the permittee shall give written notice of closure to the Water Quality Compliance Section of the permittee's intent to cease operation without resuming activity for which the facility was designed or operated, or submit an amendment application to incorporate the discharging facilities under

this permit into the current individual permit (Inventory Number P-101704, LTF Number 53498, dated August 12, 2011).

2.9.1 Closure Plan

Within 90 days of the effective date of this permit, the permittee shall submit for approval to the Groundwater Section, a Closure Plan which meets the requirements of A.R.S. § 49-252 and A.A.C. R18-9-A209(B)(3) and includes the following topics:

1. Updated closure and post-closure financial requirements.
2. Contingency mine block rinsing and sampling, as needed.
3. Confirmation PTF mine block sampling requirements after the completion of the pilot test.
4. Confirmation underground workings sampling requirements after the completion of the pilot test.
5. Outline of Report contents for PTF Summary Report that incorporates updated groundwater modeling at the cessation of the pilot test.
6. An initial 5 year post-closure groundwater monitoring period, with an evaluation to complete additional post-closure monitoring.
7. 5 Year Post-Closure Groundwater Monitoring Report that incorporates updated groundwater modeling.

2.9.2 PTF Mine Block Closure

The permittee will commence PTF closure after the pilot test mining phase has ceased. During mine block closure operations, the permittee will cease the injection of raffinate, and will initiate a mine block rinsing program consisting of the injection of formation water and neutralization agents. At all times during initial block rinsing, the permittee will maintain hydraulic control by sustaining an inward hydraulic gradient within the mine block. The permittee will monitor the rinsing progress by analyzing the water recovered from well-field headers for sulfate concentration. When levels of sulfate in the headers have reached approximately 750 parts per million (ppm), the permittee will sample the injection well header discharges for constituents listed in Section 4.1 Table 4.1-7. If the results of the sampling show concentrations of parameters greater than the AWQS and or greater than the pre-determined mine block concentrations, then rinsing operations will continue until all compounds are below primary MCLs or AWQS or predetermined AWQS mine block concentrations.

The permittee will sample all of the wells in the mine block undergoing closure to determine if the sulfate concentrations are less than 750 ppm and the pH is above 5.0 S.U. The permittee will continue rinsing each well until such time that the sulfate concentration in the well is less than 750 ppm and the pH is above 5 S.U.

When all individual well sulfate concentrations in the mine block are less than 750 ppm and a pH is above 5.0 S.U., hydraulic control will be discontinued for 30 days. At the end of the 30-day period, the headers will be re-sampled and if sulfate concentrations remain below 750 ppm and pH remains above 5.0 S.U., the permittee may cease all rinsing activities within the PTF. All POC wells will continue to be monitored in accordance with Section 2.5.3.3 and 2.5.3.4.

A confirmation groundwater sample of the PTF mine block wells will be required at a one month period, six month period and at the one year increment after the groundwater rinsing has ceased to measure any rebound effects to mine block contaminant concentrations for constituents listed in Section 4.1, Table 4.1-7. The results of the confirmation mine block sampling shall be submitted to ADEQ GWS within 30 days of receiving the laboratory analytical results. The permittee shall amend APP P-101704 to incorporate the required mine block closure confirmation sampling which extends beyond the permitted time frames allowed by the Temporary APP pilot project.

The PTF mine block wells shall be abandoned in accordance with ADWR and UIC regulations. EPA and ADEQ written approval shall be obtained prior to abandoning PTF mine block wells.

2.10 Post-closure [A.R.S. §§ 49-243(K)(6), 49-252 and A.A.C. R18-9-A209(C)]
Post-closure requirements shall be established based on the approval of Closure Plan submitted to ADEQ per Section 2.9.1.

3.0 COMPLIANCE SCHEDULE [A.R.S. § 49-243(K)(5) and A.A.C. R18-9-A208]

For each compliance schedule item listed below, the permittee shall submit the required information, including a cover letter that lists the compliance schedule items, to the Groundwater Section. A copy of the cover letter must also be submitted to the Water Quality Compliance Section.

Submittals Not Requiring Permit Amendments

Description	Comments	Due Date
Permittee shall submit a copy of signed, dated and sealed as-built drawings along with QA/QC documentation to confirm that all discharging facilities were constructed in accordance with the design report, engineering plans and specifications, and other associated data and information approved by ADEQ.		Within 60 days of completion of construction of the PTF
Permittee shall submit a copy of the initial aquifer pump test results for the PTF wells to the ADEQ Groundwater Section for review.		Within 30 days of completion of construction, and prior to beginning operation of the PTF
Permittee shall submit ambient mine block groundwater concentrations for the PTF wells		Within 30 days prior to start-up of PTF
Permittee shall submit documentation that indicates the core holes and wells within 500 feet of PTF and within a 150-foot radius of the Process Water Impoundment and Runoff Pond have been appropriately plugged and abandoned.		Within 30 days prior to start-up of PTF
Permittee shall submit an updated contingency and emergency response plan that complies with the requirements of Arizona Administrative Code R18-9-A204.		Within 30 days of the effective date of the permit (See Section 1.0)
Permittee shall conduct initial discharge characterization for parameters listed in Section 4.1, Table 4.1-2C for the PLS Tank, Raffinate Tank, Process Water Impoundment, Run-off Pond and Underground Workings.		Within 90-120 days of start-up of the PTF
Permittee shall submit initial discharge characterization results for the PLS Tank, Raffinate Tank, Process Water Impoundment, Run-off Pond and Underground Workings shall be submitted to the GWS.		Within 30 days of receipt of the laboratory analytical results
Permittee shall submit renewal application for this permit.	If the permittee determines additional time in excess of one year after this permit's effective date is needed to conduct the Pilot Study	Within 60 days prior to the end of the initial year of this permit's effective date.

Description	Comments	Due Date
Permittee shall submit a closure plan for all discharging facilities permitted under this Temporary Individual Permit in accordance with Section 2.9.1.		Within 90 days of the effective date of the permit (See Section 1.0)
Permittee shall install POC wells M54-LBF, M54-O in accordance with all Arizona Department of Water Resources (ADWR) requirements		Within 30 days of the effective date of the permit (See Section 1.0)
Permittee shall install POC well M52-UBF in accordance with all Arizona Department of Water Resources (ADWR) requirements.		Within 60 days of the effective date of the permit (See Section 1.0)
Permittee shall complete Ambient Water Quality Monitoring for POC wells M54-LBF, M54-O and M52-UBF. POC wells shall be sampled for eight (8) sampling rounds, consisting of one sample every two weeks, in accordance with Section 2.5.3.2. The samples shall be analyzed for all of the parameters listed in Table 4.1-5		First ambient sampling round within 60 days of the effective date of the permit (See Section 1.0)

Submittals/Activities Requiring Permit Amendment Applications

Description	Comments	Due Date
Permittee shall submit calculated alert levels for arsenic (see Section 2.5.7) based on fate and transport considerations to ensure that the arsenic UPL of 0.01 mg/L is not exceeded at the downgradient edge of the State Mineral Lease Land.		Within 30 days prior to start-up of PTF
Permittee shall install an ADEQ approved monitoring well (MW-01) in the down gradient direction at the PTF well boundary in accordance with Section 2.5.8.		Within 45 days of the effective date of the permit (See Section 1.0)
Permittee shall submit a well completion report for POC wells M54-LBF, M54-O and M52-UBF in accordance with Section 2.4.1.1. The report shall include a discussion of well installation and development activities, and geologic and well construction logs. The logs shall include the ADWR well registration number, the "as-built" cadastral, and latitude and longitude coordinates for the well.		Within 45 days of well installation
Permittee shall submit a report that includes copies of all laboratory analytical reports, field notes, the QA/QC limits used in collection and analysis of the samples, and statistical calculations of the ALs and AQLs for all wells under the ambient water quality monitoring requirement. Incorporation of ALs and AQLs shall constitute a minor amendment to the permit pursuant to A.A.C. R18-9-A211(C)(7) unless an alternative method for determining ALs other than that set forth in Section 2.5.3.2.1 and 2.5.3.2.2 is proposed by the permittee and accepted by ADEQ.		Within 30 days of receipt of the laboratory analytical analysis of the final ambient sampling round

Description	Comments	Due Date
Permittee shall submit an amendment application to incorporate all discharging facilities, and all closure/post-closure activities in accordance with an ADEQ approved Closure Plan per Section 2.9.1 from APP P-106360 into APP P-101704. The application shall also include updated closure/post-closure cost estimates for APP P-101704 and a corresponding updated financial assurance mechanism for APP P-101704.		Within 180 days of the effective date of this permit (See Section 1.0)

4.0 TABLES OF MONITORING REQUIREMENTS

4.1 OPERATIONAL MONITORING (or CONSTRUCTION REQUIREMENTS)

Table 4.1-1 Permitted Facilities and BADCT
Table 4.1-2A **One-time Sampling Event-Discharge Monitoring Locations**
Table 4.1-2B **Multiple Sampling Event-Discharge Monitoring Location**
Table 4.1-2C **Discharge Monitoring Sampling Parameters**
Table 4.1-3 Required Inspections and Operational Monitoring
Table 4.1-4 Leak Collection and Removal System Monitoring
Table 4.1-5 Parameters for Ambient Groundwater Monitoring
Table 4.1-6 Quarterly Compliance Groundwater Monitoring
Table 4.1-7 Semi-Annual Compliance Groundwater Monitoring
Table 4.1-8 Injection/Recovery Well Operational Monitoring

Table 4.1-1
Permitted Facilities and BADCT

Facility Name	Latitude/Longitude	Facility BADCT
In-Situ Area Injection and Recovery Well Block	33° 3' 1.39" N/111° 26' 4.69" W	Design, construction, testing (mechanical integrity), and operation of injection and recovery wells shall follow EPA Class III rules (40 CFR Part 146). The maximum injection *rate* shall be no greater than 60 gallons per minute (gpm) per injection well as a monthly average. The maximum *fracture pressure* shall be no greater than 0.65 pounds per square inch per foot (psi/ft) of depth. Hydraulic control shall be maintained at all times, within the PTF well block, by pumping recovery wells at a rate greater than the injection rate in order to maintain a cone of depression. The injection and extraction volumes shall be metered at the well-heads, monitored daily, and recorded. All boreholes or wells, other than those approved for the PTF, located within 500-feet of the PTF well field boundary shall be plugged and abandoned per the Arizona Department of Water Resources (ADWR) rules and EPA Underground Injection Control (UIC) regulations prior to PTF operation. During closure of the PTF all operational wells shall be plugged and abandoned per the above regulations.
Process Water Impoundment (PWI)	33° 3' 8.67" N/111° 25' 22.18" W	The PWI will have a capacity of approximately 1.7 million cubic feet, approximately 15 to 23-feet deep, with internal and external side slopes of 2.5-feet horizontal to 1.0-feet vertical (2.5H:1V)), and maintain a minimum of two (2) feet freeboard. The PWI will be designed as a double liner system and includes a leak collection and removal system (LCRS). The liner system consists of, from bottom to top; a compacted sub-grade (foundation) with liner bedding, 60-mil HDPE secondary liner, geonet, and 60-mil primary liner. The LCRS will be equipped with a sump located at the lowest elevation of the pond; a sump pump to remove accumulated liquids; and an alarm system for fluid detection.
Run-off Pond	33° 3' 4.66" N/111° 25' 22.6" W	The Runoff Pond will have a capacity of approximately 6,583 cubic feet; the pond depth will be approximately 5-feet deep but will vary; internal and external side slopes will be no less than 2.0-feet horizontal to 1.0-feet vertical (2.5H:1V); and pond shall maintain two (2) feet of freeboard. The Runoff Pond will be designed with a single liner that includes an engineered compacted sub-grade and 60-mil HDPE geomembrane liner. The Runoff Pond will incorporate a sump with pump along with fluid-level detection equipment. When fluid is detected above the level set-point the pump will transfer fluid out of the Runoff Pond to the Water Impoundment per pipeline.

TABLE 4.1-2A One-time Sampling Event-Discharge Monitoring Locations			
Sampling Point Number	**Facility**	**Latitude**	**Longitude**
001	PLS Tank	33° 03' 4.26"	111° 25' 19.50"
002	Raffinate Tank	33° 03' 4.05"	111° 25' 19.68"
003	Process Water Impoundment	33° 03' 8.67"	111° 25' 22.18"
004	Runoff Pond	33° 03' 4.66"	111° 25' 22.6"

TABLE 4.1-2B Multiple Sampling Event-Discharge Monitoring Location			
Sampling Point Number	**Facility**	**Latitude**	**Longitude**
005	Underground workings – Main Shaft	33° 03' 4.13"	111° 25' 45.07"

Table 4.1-2C Discharge Monitoring Sampling Parameters (in mg/L unless otherwise noted)		
pH – field & lab (SU)	Sodium	Nickel
Specific Conductance - field and lab (μmhos/cm)	Iron	Selenium
Total Dissolved Solids	Aluminum	Thallium
Total Alkalinity	Antimony	Zinc
Carbonate	Arsenic	Gross Alpha Particle Activity (pCi/L) [1]
Bicarbonate	Barium	Radium 226 + Radium 228 (pCi/L)
Nitrate	Beryllium	Uranium-Isotopes (pCi/L) [2]
Sulfate	Cadmium	Total Petroleum Hydrocarbons
Chloride	Chromium	Benzene
Fluoride	Cobalt	Toluene
Calcium	Copper	Ethylbenzene
Ammonia	Lead	Total Xylenes
Magnesium	Manganese	Uranium, Total (μg/L)
Potassium	Mercury	

1. The adjusted gross alpha particle activity is the gross alpha particle activity, including radium 226, and any other alpha emitters, if present in the water sample, minus radon and total uranium (the sum of uranium 238, uranium 235 and uranium 234 isotopes). The gross alpha analytical procedure (evaporation technique: EPA Method 900.0) drives off radon gas in the water samples. Therefore, the Adjusted Gross Alpha should be calculated using the following formula: (Laboratory Reported Gross Alpha MINUS Sum of the Uranium Isotopes).
2. Uranium Isotope activity results must be used for calculating Adjusted Gross Alpha.

NOTE: Metals shall be analyzed as dissolved metals.

Table 4.1-3
Required Inspections and Operational Monitoring

Facility Category	Facility Name	Operational Requirements	Inspection Frequency
Process Solution Impoundment	Process Water Impoundment	-Maintain 2 feet of freeboard; -all discharge and sump pumps operational; -no substantial erosion, subsidence, cracking, -no evidence of seepage or other damage to berms; -no visible cracks or damage to liner; -full access to leak detection system maintained.	Daily
Lined Non-stormwater Containment Pond	Run-off Pond	-Maintain 2 feet of freeboard; -Spillway clear of sediment or obstructions; -no visible cracking or damage to liner; -no operational damage to enclosure wall; -all pumps operational; -backup power supply operational; -no ponding of spilled material in pond and sumps; -sediment deeper than 1 inch deep removed from sumps; -fluids in sumps maintained at less than pump-down levels.	Weekly
Storm water control structures	Site-wide - stormwater ditches	-No substantial erosion or structural damage; -maintained free of sediments, vegetation or obstructions.	Monthly
Groundwater Monitoring Wells	Site-wide - monitoring wells	Wellhead cap or box locks are observed to be secure.	Quarterly, as sampled
Pumps	Site-wide - Barge Pumps, Run-Off Transfer Pumps, Sump Pumps, Discharge Pumps	Check hour meters; -visual inspection for leaks. -Lubrication -Maintenance and test run.	Weekly Per manufacturers specification Every 1,000 to 1,200 hours of operation
In-Situ Area Injection and Recovery Well Block	Well Field	No leakage from pipelines, manifolds or well heads.	Daily
In-Situ Area Injection and Recovery Well Block	Well Field	Initiate subsidence/fissure monitoring program.	Quarterly

Table 4.1-4
Leak Collection and Removal System Monitoring

Facility Name	Alert Level #1 (GPD)	Alert Level #2 (GPD)	Monitoring Method	Monitoring Frequency	Reporting Frequency
Process Water Impoundment	2,040	16,250	Automated	Daily	Annual

GPD = gallons per day per wetted acre

Note: The Alert Level 1 (AL1) or Alert Level 2 (AL2) shall be exceeded when the amount of leakage pumped from the sump for the evaporation pond is greater than the applicable quantity above. For reporting purposes on the SMRF, the AL1 is equivalent to the Alert Level and AL2 is equivalent to the DL. An exceedance of the DL is not a violation of the permit unless the permittee fails to perform as required under Section 2.6.2.3.

Table 4.1-5
Parameters for Ambient Groundwater Monitoring (in mg/L unless otherwise noted)

Depth to Water Level (feet)	Potassium	Nickel
Water Level Elevation (feet amsl)	Sodium	Selenium
Temperature- field (°F)	Iron	Thallium
pH – field & lab (SU)	Aluminum	Zinc
Specific Conductance- field & lab (μmhos/cm)	Antimony	Free Cyanide
Total Dissolved Solids	Arsenic	Adjusted Gross Alpha (pCi/L)[1]
Total Alkalinity	Barium	Radium 226 (pCi/L)
Bicarbonate	Beryllium	Radium 228 (pCi/L)
Carbonate	Cadmium	Uranium-Isotopes(pCi/L)[2]
Hydroxide	Chromium	Carbon Disulfide
Sulfate	Cobalt	Benzene
Chloride	Copper	Toluene
Fluoride	Lead	Ethylbenzene
Nitrate + Nitrite	Manganese	Total Xylenes
Calcium	Mercury	Uranium, Total (μg/L)
Magnesium	Molybdenum	

1. The adjusted gross alpha particle activity is the gross alpha particle activity, including radium 226, and any other alpha emitters, if present in the water sample, minus radon and total uranium (the sum of uranium 238, uranium 235 and uranium 234 isotopes). The gross alpha analytical procedure (evaporation technique: EPA Method 900.0) drives off radon gas in the water samples. Therefore, the Adjusted Gross Alpha should be calculated using the following formula: (Laboratory Reported Gross Alpha MINUS Sum of the Uranium Isotopes).
2. Uranium Isotope activity results must be used for calculating Adjusted Gross Alpha.

NOTE: Metals must be analyzed as dissolved metals.

TABLE 4.1-6
Quarterly Compliance Groundwater Monitoring (in mg/L unless otherwise noted)

Parameter	POC Well # M14-GL		POC Well # M15-GU		POC Well # M22-O		POC Well # M23-UBF	
	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)
Depth to Groundwater (ft bgs)	Monitor[1]	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Water Level Elevation (ft amsl)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
pH- field (S.U.)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Specific Conductance- field (µmhos/cm)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Temperature- field (°F)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Fluoride	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2
Magnesium	Monitor	23	Monitor	44	Monitor	8.6	Monitor	69
Sulfate	Monitor	144	Monitor	126	Monitor	86	Monitor	411
Total dissolved solids	Monitor	874	Monitor	1,359	Monitor	1,094	Monitor	2,392

Parameter	POC Well #M54-LBF		POC Well # M54-O		POC Well # M52-UBF	
	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)
Depth to Groundwater (ft bgs)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Water Level Elevation (ft amsl)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
pH- field (S.U.)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Specific Conductance- field (µmhos/cm)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Temperature- field (°F)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Fluoride	Reserved[2]	Reserved	Reserved	Reserved	Reserved	Reserved
Magnesium	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Sulfate	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Total dissolved solids	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved

1 Monitor = Monitoring required, but no AQL or AL will be established in the permit.

2. Reserved = At the conclusion of eight (8) rounds of groundwater sampling; the permittee is required to submit an Ambient Groundwater Report and a permit amendment request to the GWS to propose AQLs and ALs in accordance with the Compliance Schedule (Section 3.0). Alert levels and aquifer quality limits shall be established as required in Sections 2.5.3.2.1 and 2.5.3.2.2.

TABLE 4.1-7
Semi-Annual Compliance Groundwater Monitoring (in mg/L unless otherwise noted)

Parameter[1]	POC Well # M14-GL		POC Well # M15-GU		POC Well # M22-0		POC Well M23-UBF	
	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)
Depth to Groundwater (ft	Monitor[2]	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Water Level Elevation (ft amsl)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
pH- field (S.U.)		Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Specific Conductance-field (umhos/cm)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Temperature- field(°F)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
pH (lab)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Bicarbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Calcium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Carbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Chloride	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Fluoride	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2
Magnesium	Monitor	23	Monitor	44	Monitor	8.6	Monitor	69
Nitrate as nitrogen[3]	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Potassium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Sodium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Sulfate	Monitor	144	Monitor	126	Monitor	86	Monitor	411
Total dissolved solids	Monitor	874	Monitor	1359	Monitor	1094	Monitor	2392
Cation/anion balance	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Aluminum	Monitor	0.71	Monitor	0.71	Monitor	0.71	Monitor	0.71
Antimony	0.006	0.0048	0.006	0.0048	0.0076	Monitor	0.006	0.0048
Arsenic[4]	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026
Barium	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6
Beryllium	0.004	0.0032	0.0043	0.0032	0.004	0.032	0.004	0.0032
Cadmium	0.005	0.004	0.02	Monitor	0.02	Monitor	0.005	0.004
Chromium (total)	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08
Cobalt	Monitor	0.005	Monitor	0.005	Monitor	0.005	Monitor	0.005
Copper	Monitor	0.51	Monitor	0.51	Monitor	0.51	Monitor	0.51

Iron (total)	Monitor	2.2	Monitor	2.2	Monitor	2.2	Monitor	2.2
Lead	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04

TABLE 4.1-7 Semi-Annual Compliance Groundwater Monitoring (in mg/L unless otherwise noted)

Parameter	POC Well # M14-GL		POC Well # M15-GU		POC Well # M22-O		POC Well # M23-UBF	
	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)	AQL (mg/l)	AL (mg/l)
Manganese	Monitor	0.22	Monitor	0.22	Monitor	0.22	Monitor	0.22
Mercury	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016
Nickel	0.1	0.08	0.1	0.08	0.1	0.08	0.10	0.08
Selenium	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04
Thallium	0.002	0.0016	0.002	0.0016	0.01	Monitor	0.012	Monitor
Zinc	Monitor	2.5	Monitor	2.5	Monitor	2.5	Monitor	2.5
Adjusted Gross Alpha[5] (pCi/L)	15	12	15	12	15	12	15	12
Radium 226 + 228 (pCi/L)	5	4	5	4	5	4	5	4
Uranium Isotopes [6](pCi/L)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Uranium, Total (µg/L)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total petroleum hydrocarbons- diesel	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Benzene	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004
Ethylbenzene	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56
Toluene	1.0	0.08	1.0	0.08	1.0	0.08	1.0	0.08
Total Xylene	10	8	10	8	10	8	10	8

1 Metals must be analyzed as dissolved metals.
2. Monitor = Monitoring required, but no AQL or AL will be established in the permit.
3. Nitrate-nitrite as N may be determined as the sum of nitrate (EPA 352) plus nitrite (EPA 354) expressed as N.
4. The Alert Level for Arsenic is a narrative standard that is applied in order to protect downgradient users and will be revised, as necessary, in accordance with Section 2.5.7 and Section 3.0 to ensure that the UPL of 0.01 mg/L is not exceeded at the downgradient edge of the State Mineral Lease Land.
5 If the gross alpha particle activity is greater than the AL or AQL, then calculate the adjusted gross alpha particle activity. The adjusted gross alpha particle activity is the gross alpha particle activity, including radium 226, and any other alpha emitters, if present in the water sample, minus radon and total uranium

(the sum of uranium 238, uranium 235 and uranium 234 isotopes). The gross alpha analytical procedure (evaporation technique: EPA Method 900.0) drives off radon gas in the water samples. Therefore, the Adjusted Gross Alpha should be calculated using the following formula: (Laboratory Reported Gross Alpha MINUS Sum of the Uranium Isotopes).

6. Uranium Isotope activity results must be used for calculating Adjusted Gross Alpha.

TABLE 4.1-7 Semi-Annual Compliance Groundwater Monitoring (in mg/L unless otherwise noted)						
Parameter[1]	**POC Well # M54-LBF**		**POC Well #M54-0**		**POC Well # M52-UBF**	
	AQL (mg/l)	**AL (mg/l)**	**AQL (mg/l)**	**AL (mg/l)**	**AQL (mg/l)**	**AL (mg/l)**
Depth to Groundwater (ft	Monitor[2]	Monitor	Monitor	Monitor	Monitor	Monitor
Water Level Elevation	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
pH- field) (S.U.)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Specific conductance - field) (umhos/cm)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Temperature -field(°F)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
pH (lab)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Bicarbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Calcium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Carbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Chloride	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Fluoride	Reserved[7]	Reserved	Reserved	Reserved	Reserved	Reserved
Magnesium	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Nitrate as nitrogen [3]	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Potassium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Sodium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Sulfate	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Total dissolved solids	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Cation/anion balance	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Aluminum	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Antimony	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Arsenic[4]	0.05	0.026	0.05	0.026	Reserved	Reserved
Barium	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Beryllium	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Cadmium	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Chromium (total)	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Cobalt	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Copper	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Iron	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Lead	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved

TABLE 4.1-7 Semi-Annual Compliance Groundwater Monitoring (in mg/L unless otherwise noted)						
Parameter	**POC Well # M54-LBF**		**POC Well # M54-O**		**POC Well # M52-UBF**	
	AQL (mg/l)	**AL (mg/l)**	**AQL (mg/l)**	**AL (mg/l)**	**AQL (mg/l)**	**AL (mg/l)**
Manganese	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Mercury	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Nickel	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Selenium	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Thallium	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Zinc	Monitor	Reserved	Monitor	Reserved	Monitor	Reserved
Adjusted Gross Alpha [5] (pCi/L)	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Radium 226 + 228 (pCi/L)	Reserved	Reserved	Reserved	Reserved	Reserved	Reserved
Uranium Isotopes [6](pCi/L)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Uranium, Total (µg/L)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total petroleum hydrocarbons- diesel	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Benzene	0.005	0.004	0.005	0.004	0.005	0.004
Ethylbenzene	0.7	0.56	0.7	0.56	0.7	0.56
Toluene	1.0	0.08	1.0	0.08	1.0	0.08
Total Xylene	10	8	10	8	10	8

7. Reserved = At the conclusion of eight (8) rounds of groundwater sampling; the permittee is required to submit an Ambient Groundwater Report and a permit amendment request to the GWS to propose AQLs and ALs in accordance with the Compliance Schedule (Section 3.0). Alert levels and aquifer quality limits shall be established as required in Sections 2.5.3.2.1 and 2.5.3.2.2.

TABLE 4.1-8

In-Situ BADCT Monitoring

Parameter	Monitoring Frequency	Alert Level	Method	Reporting Frequency
Injection Rate of well field	Monthly average	When Greater than 240gpm	Flow Meter	Monthly
Recovery Rate of well field	Monthly average	Maximum 300 gpm	Flow Meter	Monthly
Recovered Volume to Injection Volume	Daily	Recovered Volume is Less than Injected Volume*	Flow Meter	Weekly
Inward Hydraulic Gradient	Daily average	Less than 1-foot differential as a daily average	Transducer	Weekly
Maximum Injection Pressure	Daily	When Greater than 0.65 psi/ft.	Pressure Gauge	Weekly

*Per monitoring of designated 4-pairs of observation/recovery wells (EPA UIC Class III)

5.0 REFERENCES AND PERTINENT INFORMATION

The terms and conditions set forth in this permit have been developed based upon the information contained in the following, which are on file with the Department:

1. Public File for Curis Resources Inc., Application for Temporary Individual Aquifer Protection Permit, dated March 12, 2012, Public File No P-106360.

6.0 NOTIFICATION PROVISIONS

6.1 Annual Registration Fees

The permittee is notified of the obligation to pay an Annual Registration Fee to ADEQ. The Annual Registration Fee is based upon the amount of daily influent or discharge of pollutants in gallons per day as established by A.R.S. § 49-242.

6.2 Duty to Comply [A.R.S. §§ 49-221 through 49-263]

The permittee is notified of the obligation to comply with all conditions of this permit and all applicable provisions of Title 49, Chapter 2, Articles 1, 2 and 3 of the Arizona Revised Statutes, Title 18, Chapter 9, Articles 1 through 4, and Title 18, Chapter 11, Article 4 of the Arizona Administrative Code. Any permit non-compliance constitutes a violation and is grounds for an enforcement action pursuant to Title 49, Chapter 2, Article 4 or permit amendment, suspension, or revocation.

6.3 Duty to Provide Information [A.R.S. §§ 49-243(K)(2) and 49-243(K)(8)]

The permittee shall furnish to the Director, or an authorized representative, within a time specified, any information which the Director may request to determine whether cause exists for amending or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

6.4 Compliance with Aquifer Water Quality Standards [A.R.S. §§ 49-243(B)(2) and 49-243(B)(3)]

The permittee shall not cause or contribute to a violation of an aquifer water quality standard at the applicable point of compliance for the facility. Where, at the time of issuance of the permit, an aquifer already exceeds an aquifer water quality standard for a pollutant, the permittee shall not discharge that pollutant so as to further degrade, at the applicable point of compliance for the facility, the water quality of any aquifer for that pollutant.

6.5 Technical and Financial Capability
[A.R.S. §§ 49-243(K)(8) and 49-243(N) and A.A.C. R18-9-A202(B) and R18-9-A203(E) and (F)]

The permittee shall have and maintain the technical and financial capability necessary to fully carry out the terms and conditions of this permit. Any bond, insurance policy, trust fund, or other financial assurance mechanism provided as a demonstration of financial capability in the permit application, pursuant to A.A.C. R18-9-A203(D), shall be in effect prior to any discharge authorized by this permit and shall remain in effect for the duration of the permit.

6.6 Reporting of Bankruptcy or Environmental Enforcement [A.A.C. R18-9-A207(C)]

The permittee shall notify the Director within five days after the occurrence of any one of the following:

1. The filing of bankruptcy by the permittee.
2. The entry of any order or judgment not issued by the Director against the permittee for the enforcement of any environmental protection statute or rule.

6.7 Monitoring and Records [A.R.S. § 49-243(K)(8) and A.A.C. R18-9-A206]

The permittee shall conduct any monitoring activity necessary to assure compliance with this permit, with the applicable water quality standards established pursuant to A.R.S. §§ 49-221 and 49-223 and §§ 49-241 through 49-252.

6.8 Inspection and Entry [A.R.S. §§ 41-1009, 49-203(B) and 49-243(K)(8)]

In accordance with A.R.S. §§ 41-1009 and 49-203(B), the permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to enter and inspect the facility as reasonably necessary to ensure compliance with Title 49, Chapter 2, Article 3 of the Arizona Revised Statutes, and Title 18, Chapter 9, Articles 1 through 4 of the Arizona Administrative Code and the terms and conditions of this permit.

6.9 Duty to Modify [A.R.S. § 49-243(K)(8) and A.A.C. R18-9-A211]
The permittee shall apply for and receive a written amendment before deviating from any of the designs or operational practices specified by this permit.

6.10 Permit Action: Amendment, Transfer, Suspension & Revocation
[A.R.S. §§ 49-201, 49-241 through 251, A.A.C. R18-9-A211, R18-9-A212 and R18-9-A213]
This permit may be amended, transferred, renewed, or revoked for cause, under the rules of the Department.

The permittee shall notify the Groundwater Section in writing within 15 days after any change in the owner or operator of the facility. The notification shall state the permit number, the name of the facility, the date of property transfer, and the name, address, and phone number where the new owner or operator can be reached. The operator shall advise the new owner or operators of the terms of this permit and the need for permit transfer in accordance with the rules.

7.0 ADDITIONAL PERMIT CONDITIONS

7.1 Other Information [A.R.S. § 49-243(K)(8)]
Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, the permittee shall promptly submit the correct facts or information.

7.2 Severability
[A.R.S. §§ 49-201, 49-241 through 251, A.A.C. R18-9-A211, R18-9-A212 and R18-9-A213]
The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. The filing of a request by the permittee for a permit action does not stay or suspend the effectiveness of any existing permit condition.

7.3 Permit Transfer
This permit may not be transferred to any other person except after notice to and approval of the transfer by the Department. No transfer shall be approved until the applicant complies with all transfer requirements as specified in A.A.C. R18-9-A212(B) and (C).

Exhibit Q-2

Closure and Post-Closure Plan

FLORENCE COPPER, INC.

UIC PERMIT APPLICATION

FLORENCE COPPER PROJECT – PRODUCTION TEST FACILITY

EXHIBIT Q-2 – CLOSURE AND POST-CLOSURE PLANS

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1 Introduction

1.1 Background

Florence Copper, Inc. (FCI) has prepared this Closure and Post-Closure Plan in response to the requirements of Item 25.J of the Individual Aquifer Protection Permit (APP) Application Form (Form, GWS 101, Rev. July 2011) and adapted as Exhibit Q-2 of the updated Underground Injection Control (UIC) Permit application (Application). This plan includes information that describes the closure and post-closure activities proposed by FCI for the Production Test Facility (PTF) proposed to be located on State land leased by FCI (Mineral Lease No. 11-26500). The closure and post-closure plans described in this Exhibit and the cost estimates presented in Attachment R of this Application are specific to the proposed PTF and are in addition to closure and post-closure plans and cost estimates previously submitted to the Arizona Department of Environmental Quality (ADEQ) and the United States Environmental Protection Agency (USEPA) for the surrounding property.

Information presented in this plan is more appropriately described as a closure strategy than a closure plan. Arizona Revised Statute (A.R.S.) § 49-243.A.8 requires applicants for individual permits to submit "closure strategies" with their applications, whereas Arizona Administrative Code (A.A.C.) R18-9-A209.B.3 requires an owner or operator of a permitted facility to submit a "closure plan" within 90 days after announcing an intent to permanently close all or part of the permitted facility.

In addition to this closure and post-closure plan, FCI is required to develop and comply with closure and post-closure plans in accordance the USEPA's UIC regulations and to comply with the reclamation requirements of the Arizona State Land Department (ASLD) as specified in its regulations and in Mineral Lease No. 11-26500. The focus of this plan is to close the PTF components in a manner that will protect groundwater in accordance with APP and UIC regulations and that will be consistent with ASLD requirements.

1.2 PTF Description

The proposed components of the PTF include:

- PTF well field including four injection wells, nine recovery wells, seven observation wells, four multi-level sampling wells, well heads, piping, and liners.
- Pipeline corridor including liner, sumps, a pipeline for pregnant leach solution (PLS), and a pipeline for raffinate/lixiviant.
- Beneficiation area including:
  - Sulfuric acid delivery area, tank, transfer pump;
  - Dry lime delivery area, mixing tank, transfer pump;
  - Raffinate tanks, transfer pumps;
  - PLS tanks, transfer pumps; and
  - Solvent extraction/electrowinning (SX/EW) plant.

  **Note: All components listed under "Beneficiation Area" are located on impermeable liners and either drain directly to the runoff pond or drain to lined sumps for collection and return to the runoff pond.
- Runoff pond with sump and sump pump serving the beneficiation area.
- Water impoundment with mechanical evaporators.
- Motor control center.
- Modular trailers for offices, control rooms, etc.
- Groundwater supply well.

- Potable water tank and pump.
- Fire water tank and fire water pump.
- Low Expansion Foam fire suppression system.
- Diesel generators (portable).
- Septic holding tank.
- Overhead electric power supply.
- Security fencing around the beneficiation area and the water impoundment.
- Seven Point of Compliance (POC) wells.

1.3 Existing Facilities

There are no known existing discharging facilities located within the Pollutant Management Area (PMA), but there are existing features (wells, core holes, and underground workings) shown on Figure B-1 of this Application that are associated with exploration activities that were conducted in the 1970s and 1990s. Some of the existing wells and core holes will be abandoned in preparation of the PTF well field as described below. All other features will be unaffected by the development and operation of the PTF and will remain subject to the closure and post-closure requirements of APP No. 101704 and UIC Permit No. AZ396000001.

All wells and core holes within 500 feet of any injection well or recovery well located within the PTF well field will be abandoned before lixiviant injection may begin. They will be abandoned in accordance with Sections Q.2 through Q.4 of the Attachment Q, Plugging and Abandonment Plan (Well Abandonment Plan) included in the updated UIC application. As shown on Figure A-9 of the updated UIC application, some of the wells and core holes to be abandoned in advance of PTF operations are located south of the PMA, on FCI property.

1.4 Closure Objective

The closure objective, generally stated, is to ensure compliance with the requirements of A.R.S. §§ 49-243 B.2 and B.3 by preventing discharges of any pollutant that will cause or contribute to a violation of an Aquifer Water Quality Standard (AWQS) at the applicable POC, or that will further degrade at the applicable POC the quality of any aquifer that at the time of permit issuance violates the AWQS for that pollutant. To achieve the stated objective, FCI proposes to restore groundwater in the injection and recovery zone (IRZ) in which injection and recovery of in-situ copper recovery (ISCR) solutions are injected during PTF operations. The groundwater will be restored to a quality where constituents with AWQS meet the AWQS or pre-operational concentrations if the pre-operational concentrations exceed the AWQS. Restoring groundwater to that high quality results in a reduction of all groundwater constituents, not just constituents with AWQS. FCI also proposes to close surface facilities in a manner that will prevent contamination of the soil that could cause an exceedance of the pre-determined Soil Remediation Levels (SRLs) for residential property as listed in Appendix A of the Arizona Soil Remediation Standards and the Groundwater Protection Limits (GPLs) established by ADEQ.

This closure strategy addresses all components of the PTF, including APP-exempt facilities, to provide a comprehensive view of all proposed closure activities. This strategy and the related cost estimates provided in Attachment R of the updated UIC Application therefore address closure activities required by the APP, UIC, and ASLD programs. To avoid duplicative financial assurance, it is anticipated that the total amount of financial assurance provided to ADEQ as shown in Attachment R will be reduced by the amounts covered by requests, if any, of the USEPA and the ASLD for separate financial assurance instruments.

2 Description of Closure Activities

The following describes proposed activities for achieving the closure objective described in Section 1.4.

2.1 Closure Activities in the PTF Well Field

Closure activities in the PTF well field will occur in order of the following three steps: (1) restoration of groundwater quality in the IRZ to levels meeting AWQS or pre-operational concentrations if the pre-operational concentrations exceed AWQS; (2) closure (abandonment) of all PTF wells in accordance with the Well Abandonment Plan; and (3) closure of related surface facilities in the well field, including the pipeline corridor shown on Figure B-1.

Once the injection of lixiviant (raffinate specifically prepared for injection) is begun, the APP and the UIC Permit will require that hydraulic control be maintained in the portion of the oxide zone (IRZ) in which injection has occurred from the time that injection began until the groundwater quality in the IRZ has been restored to a quality that meets closure criteria specified in the two permits. Groundwater restoration will begin after the scheduled operations have been completed and after a notice is given in accordance with A.A.C. R18-A209.B.2.

As explained below, the groundwater restoration process involves rinsing the IRZ to reduce constituent concentrations to levels that meet AWQS or pre-operational concentrations if the pre-operational concentrations exceed AWQS. The groundwater pumped from the IRZ will flow through the same tanks, piping, and equipment as used during normal operations and will serve to rinse the tanks, piping, and equipment with increasingly high quality water over a period of several months. As a result, tanks, piping, and equipment will have been thoroughly rinsed by the time that ADEQ and USEPA approve the restoration and authorize the abandonment of the wells. This will allow the removal of all tanks, piping, equipment, and liners from the well field to the runoff pond to commence simultaneously with the abandonment of the wells. For contingency purposes, however, the last PTF components to be dismantled will be, in order, the runoff pond and the water impoundment.

2.1.1 Groundwater Restoration Process

The following is the process proposed for groundwater restoration. It assumes a notice of permanent cessation has been given in accordance with A.A.C. R18-A209.B.2 and a closure plan has been submitted in accordance with A.A.C. R18-A209.B.3.

1. Restoration of groundwater within the IRZ will begin after lixiviant injection has been discontinued. Restoration will be accomplished by using groundwater to sweep residual ISCR solutions into recovery wells. The groundwater may be pulled from the aquifer surrounding the IRZ or it may be pumped from nearby wells and then injected into the IRZ. Injection may occur with or without neutralizing material such sodium bicarbonate or other non-hazardous neutralizing agents. The duration, rate, and extent of injection and neutralization will vary as the concentrations of sulfate and other constituents detected in ISCR solutions in the recovery well header vary during the restoration process. Injection may occur through the wells used for injection during the PTF's operations, or the injection wells may be converted for use as recovery wells and vice versa in order to increase the rate of restoration throughout the IRZ.
2. As groundwater restoration nears completion, all injection wells will be converted to recovery wells to ensure that concentrations in recovery well header(s) are representative of groundwater quality in the IRZ.
3. Rinsing of the IRZ will continue and sulfate concentrations in the recovery well header solution will be periodically sampled.
4. When sulfate concentrations in the recovery well header solution decline below 750 milligrams per liter (mg/L), a sample of header water will be collected and analyzed for the Level 2 parameters (all parameters listed in Section 4.1, Table 4.1.7 of Temporary APP No. 106360 and Table P-4 of Attachment P of this Application).

5. Samples will be periodically collected from the recovery well header(s) and analyzed for Level 2 parameters until all constituents with AWQS either meet the AWQS or pre-operational concentrations if the pre-operational concentrations exceed the AWQS. (Pre-operational concentrations will be obtained by collecting groundwater samples from all PTF wells prior to the commencement of operations and analyzing the samples for all Level 2 parameters.) The "indicator sulfate concentration" will be the sulfate concentration in the recovery well header(s) existing at the time that the Level 2 analysis indicates that constituents with AWQS meet the AWQS or meet pre-operational background concentrations if those concentrations exceed the AWQS. After the indicator sulfate concentration has been determined, each well will be sampled for sulfate. Hydraulic control will continue until the sulfate concentration at each well is determined to meet the indicator sulfate concentration or alternate concentration as explained below. Provided that hydraulic control of the IRZ will be maintained, pumping from any well may be suspended when groundwater quality at that well is determined to meet the indicator sulfate concentration or alternate concentration.
6. Once the sulfate concentration at each well is less than the indicator sulfate concentration or alternate concentration, hydraulic control will be suspended at all wells in the IRZ for 30 days.
7. After 30 or more days have elapsed, the recovery wells will be re-energized and the sulfate concentration in solutions in the recovery well header(s) will be analyzed for sulfate. If the sulfate concentration(s) are equal to or below the indicator sulfate concentration or alternate concentration, the closure criteria will be deemed to have been met and the rinsing and maintenance of hydraulic control of the IRZ will be discontinued.
8. A closure report documenting the results of the restoration process will be submitted to ADEQ and USEPA and closure (abandonment) of the PTF wells will commence promptly after ADEQ and USEPA have reviewed the report and have authorized the abandonment of the wells.

The concept of using a well-specific alternate to the sulfate indicator concentration is based on the recognition that the sulfate concentration in some wells may be higher than the sulfate indicator concentration due to well-to-well variability in sulfate concentrations. A well would be eligible for an alternate concentration only if the sulfate concentration is less than 750 mg/L and the constituents meet AWQS or pre-operational concentrations if they exceed the AWQS.

2.1.2 Well Closure

The wells located within the PTF well field will be closed in accordance with the schedule described in Section 3 below if APP No. 101704 and UIC Permit No. AZ396000001 are not amended to authorize commercial ISCR operations prior to the expiration of the temporary APP for the PTF. If the permits are amended to authorize commercial ISCR operations, the wells in the PTF well field will be subject to the requirements of those permits. If the wells are required to be closed within the term of the temporary APP, they will be abandoned in accordance with the Plugging and Abandonment Plan (Well Abandonment Plan), Attachment Q of the updated UIC Application. The Well Abandonment Plan is based on requirements of A.A.C. R12-15-816, administered by the Arizona Department of Water Resources (ADWR), and 40 CFR 146.10, administered by the USEPA.

2.1.3 Closure of Surface Facilities

Once the PTF wells have been abandoned in accordance with the Well Abandonment Plan, equipment in the well field not previously removed as part of the well abandonment process will be removed. Such equipment may include electrical equipment, power lines and poles; tanks; pipes; and all liners within the well field. Similar removal activities will occur throughout the PTF. During the removal process, some liquid and solid residues may be generated such as the removal of accumulated dust from liners. Such liquids and solid residues will be placed in the runoff pond or water impoundment, or shipped to appropriately licensed off-site disposal facilities.

Due to the extensive use of liners, containment sumps and other devices, it is anticipated that soil contamination will be minimal and that the PTF soils will qualify for clean closure in accordance with A.A.C. R18-9-A209.B.3. As liners are removed, they will be inspected for evidence of holes, tears, or defective seams that may have leaked. Soil in the area beneath the liner will be inspected and samples will be collected and analyzed in accordance with a site investigation plan previously submitted to and approved by ADEQ, as required by A.A.C. R18-9-A209.B.3. It is anticipated that the plan will require more intense sampling and analysis in any area where visible contamination is apparent (e.g., moist spots beneath liners) and a broader grid sampling approach where contamination is not apparent. Estimates of sampling costs are included in the closure cost estimates provided in Attachment R of this Application. The soil investigation plan will require that ADEQ be promptly provided a remediation plan if the soil sampling and analysis described above provides verification of an exceedance of an SRL or a GPL, and that ADEQ's approval be obtained prior to implementing the plan.

Decommissioned power poles, lines, and electrical equipment may be salvaged. Clean liners and pipes may also be salvaged or sent to facilities that recycle such material. All material that cannot be reused or salvaged will be transported to an appropriately licensed facility for disposal. Although the salvage of liners and piping is anticipated, the cost estimates in Attachment R include the cost of disposal for those items.

Once all equipment, liners, and other materials have been removed from the well field, pipeline corridor, and other PTF components, disturbed areas will be tested, backfilled as needed, disked, and a grader or other suitable equipment will level and contour the areas and any related berms to grades that are consistent with pre-development grades. The areas will then be prepared for seeding. Seeding of disturbed or reclaimed areas will occur only between September 15 and November 30.

2.2 Materials Management

Closure of the PTF components will require safe handling and disposal of all solutions associated with the facilities. Process tanks and the runoff pond will be emptied of any remaining solution. All solutions will be shipped off site for use or disposal in accordance with applicable regulations, or they will be neutralized and placed in the water impoundment. As the IRZ restoration process proceeds, the emptied tanks and ponds will have been rinsed with water produced during the restoration process and the rinse water will be placed in the water impoundment.

Unused electrowinning reagents, fuels, lubricants, and other chemicals along with warehoused materials will be packaged in accordance with Department of Transportation regulations and shipped off site or disposed of in accordance with applicable regulation. The closure objective is to have all chemicals removed off site and disposed of in a manner that meets all applicable codes and regulations.

2.3 Soil Management

Consistent with the ADEQ Clean Closure Guidance (December 2004) and A.A.C. R18-9-A209.B.3, a site investigation plan for evaluating the quality of the soil and the vadose zone after facilities have been removed will be developed for ADEQ's review and approval before closure is begun.

All closure activities will be designed and conducted in accordance with applicable criteria in the Best Available Demonstrated Control Technology (BADCT) Guidance Manual. All closure activities will be conducted in a manner to prevent spillage of contaminants onto soil and, as tanks and underlying liners are removed, underlying soil will be inspected for signs of leakage. The same process will apply to the liners of the pipeline corridor, the runoff pond, and the water impoundment. Soil samples will be collected and analyzed in accordance with the approved site investigation plan. Soil cleanup (remediation) plans will be submitted for ADEQ approval in areas where residential SRL or GPL exceedances are verified. The remediation plans will be designed to achieve constituent levels that will be consistent with the expected post-closure use.

After remediation plans have been implemented and residual soil conditions are approved by ADEQ, the excavated area will be backfilled, disked, and leveled consistent with the area's pre-development grade. Seeding of the area will occur only between September 15 and November 30.

2.4 Closure Monitoring

Closure monitoring will consist of physical inspections of surface facilities and monitoring of groundwater quality at the POC wells and supplemental monitoring wells during the closure period.

Inspection monitoring of surface facilities will continue through the closure period at each of the locations and at the frequencies specified in Temporary APP No. 106360 and the UIC Permit until liquid and solid residues have been removed from the facilities being monitored. POC well and supplemental monitoring well monitoring will be in accordance with the requirements of the temporary APP at the seven proposed POC wells listed in Temporary APP No. 106360 and the seven supplemental monitoring wells identified in the UIC Permit. The POC well and supplemental monitoring well monitoring programs will include two components (Level 1 and Level 2). Level 1 and Level 2 monitoring refer respectively to sampling and analysis of groundwater for the parameters listed in Tables 4.1-6 and 4.1-7 of Temporary APP No. 106360 and Tables P-3 and P-4 of Attachment P of the UIC Permit. The monitoring will occur quarterly for Level 1 parameters and annually for Level 2 parameters. The contingency plan will be implemented in accordance with the temporary APP and the UIC Permit throughout the closure period with respect to inspection monitoring as long as liquids and solid residues remain in the facilities being monitored. The contingency plan will be implemented with respect to the exceedance of Alert Levels (ALs) and Aquifer Quality Limits (AQLs) listed in Tables 4.1-6 and 4.1-7 of Temporary APP No. 106360 and Tables P-3 and P-4 of Attachment P of the UIC Permit throughout the closure period.

2.5 Post-Closure Monitoring

The post-closure monitoring program will primarily involve groundwater monitoring at the seven POC wells and supplemental monitoring wells because, during closure, all injection and recovery wells will be properly abandoned. All other PTF components used to store or manage ISCR solutions will also be dismantled and removed after all material contained in the components have been removed. Inspection of the closed areas will occur during POC well and supplemental monitoring well monitoring events and will focus on POC wells, supplemental monitoring wells, signage, fences, re-vegetated areas, and storm water control measures. The inspections will also focus on the maintenance of conditions required to support disturbed areas to conditions existing prior to the development and operation of the PTF or to such other conditions as specified by ASLD in Mineral Lease 11-26500, as may be amended. Photographs and written reports will be used to document observed conditions.

Groundwater monitoring at the POC wells and supplemental monitoring wells will be conducted quarterly throughout the post-closure period with Level 1 monitoring conducted three quarters per year and Level 2 monitoring conducted one quarter per year. Data generated from each monitoring event will be promptly reviewed and the contingency plans referenced in Section 2.6 of Temporary APP No. 106360 and the UIC Permit will be followed in the event of an exceedance of an AQL.

3 Closure/Post-Closure Schedules

3.1 Closure Schedules

The following discussion of closure and post-closure schedules is based on closure requirements of the temporary APP.

During PTF operations, a site investigation plan and closure plan will be developed and submitted to ADEQ in accordance with A.A.C. R18-9-A209(B)(1) and A.A.C. R18-9- A209(B)(3), respectively. The site investigation and closure plan submitted to ADEQ will be submitted to USEPA for review and approval before closure operations commence. After FCI formally gives notice to ADEQ in accordance with A.A.C. R18-9-A209(B)(2), and to USEPA of its intent to permanently cease PTF operations, injection of lixiviant will

be discontinued. However, FCI will maintain hydraulic control at the IRZ until closure criteria specified in the temporary APP and the related UIC Permit have been met. FCI will also continue all monitoring required by the temporary APP and the related UIC Permit.

The closure schedule discussed below is based on the recognition that A.A.C. R18-9-A210(E) provides that a temporary APP expires after one year unless it is renewed, and that the permit may be renewed no more than one time. If the temporary permit is renewed, FCI proposes to operate the PTF for up to 14 months and to begin closure no later than the first day of the 15th month. For purposes of estimating the closure costs included in Attachment R of the updated UIC application, an estimate was prepared of the amount of sediment and liquid remaining in the water impoundment at the end of the 14th month and at the end of the 23rd month, following commencement of operations. The estimated amounts assume the PLS flow from the recovery wells during ISCR operations will be 300 gallons per minute (gpm), which is equivalent to the maximum design flow (expressed as gallons per day) and 250 gpm during the restoration phase.

It is estimated that up to seven to nine months will elapse between the time that lixiviant injection ceases and the time that groundwater is determined to meet the closure criteria (See Step 7 of Section 2.1.1 above). As noted in Step 8 of Section 2.1.1, abandonment of the PTF wells may not proceed until ADEQ and USEPA review a report describing the results of the IRZ closure activities and approve the abandonment of the wells.

It is estimated that up to two months will be required to abandon the wells and complete closure of all PTF surface facilities once ADEQ and USEPA approve the abandonment of the wells and contractors have mobilized to the site. The relatively short time estimate is based on the recognition that tanks and piping will have been well rinsed before the approval to abandon the wells is given. That will allow closure of most surface facilities to begin at the same time that well abandonment begins. Closure of the runoff pond and the water impoundment will begin promptly after closure of the well field commences and after they are determined to be no longer needed to receive rinse water or other liquids generated during the closure process. FCI will submit a notice and report, with documentation, in accordance with the requirements of A.A.C. R18-9-A209(C) within 30 days following completion of the closure plan.

3.2 Post-Closure Monitoring Schedule

The post-closure monitoring schedule will be synchronized, to the extent practicable, with the applicable closure/post-closure schedule established under APP No. 101704 and UIC Permit No. AZ396000001 requirements. Temporary APP No. 106360 allows a five-year post-closure period, as described below. Accordingly, Attachment R includes a cost estimate for a five-year period.

- Years 1 – 4: Three quarterly Level 1 sampling events and one quarterly Level 2 event will be conducted each year. Quarterly reports will be submitted to ADEQ and USEPA.
- Year 5: Three quarterly Level 1 sampling events and one quarterly Level 2 event will be conducted. Quarterly reports will be submitted to ADEQ and USEPA. In addition, during the first quarter, a report will be submitted to ADEQ and USEPA that summarizes trends and describes significant events observed during the previous four years. Based on the information provided in the report, FCI will recommend continuation of post-closure monitoring or cessation of post-closure monitoring. If FCI recommends continuation of monitoring, the recommendation may include proposed changes in the scope and frequency of analysis. Within 180 days following its receipt of the report, ADEQ and USEPA will advise FCI of their decisions. The monitoring program will continue throughout the fifth year until such time that ADEQ and USEPA announces their decisions. If ADEQ's and USEPA's decision involves continuation of the monitoring program for the next five-year period, or portion thereof, FCI will adjust the cost estimates to reflect estimated costs for implementing that decision, and will adjust the financial assurance required for the period covered by ADEQ's and USEPA's decision.

During POC monitoring events, visual inspection of surface facilities will be conducted. Inspections will include, as appropriate, POC wells, signage, fences, re-vegetated areas, and storm water control measures. Conditions noted during inspections will be documented using inspection forms. Photographs and written reports will be used to document completion of indicated repairs. Repairs will be performed as indicated by the inspection monitoring program and will be documented in quarterly reports submitted to ADEQ and USEPA. FCI will submit a notice and report, with documentation, in accordance with the requirements of A.A.C. R18-9-A209(C) within 30 days following completion of the post-closure plan.

4 Closure/Post-Closure Cost Estimates

Attachment R of the updated UIC application includes closure and post-closure cost estimates for the PTF. Although the piping and lining may be recycled, the closure cost estimates reflect the estimated cost of disposing of the material in an appropriately licensed landfill. The post-closure costs included in Attachment R assume that the seven POC wells and seven supplemental monitoring wells will be monitored for five years and that the ADEQ and USEPA will agree that post-closure monitoring for purpose of the temporary APP and UIC Permit will not be required beyond the fifth year. At the expiration of the post-closure requirements, all POC wells except M54-O and M54-LBF would remain in service for POC monitoring as required by APP No. 101704 and UIC Permit No. AZ396000001. The supplemental monitoring wells and wells M54-O and M54-LBF are not currently included as POC wells or supplemental monitoring wells in those permits and are within the PMA established by APP No. 101704. If commercial operations proceed following completion of PTF operations, the supplemental monitoring wells and wells M54-LBF and M54-O will be plugged and abandoned because they are located within the mineralized area that will be mined during commercial operations. If ADEQ and USEPA require an extension of the five-year post-closure monitoring, FCI will submit to ADEQ and USEPA estimated costs of conducting the additional post-closure monitoring and will submit appropriate financial assurance.

Exhibit Q-3

EPA Forms 7520-14, Plugging and Abandonment Plans for Existing Wells and Core Holes

OMB No. 2040-0042 Approval Expires 11/30/2014

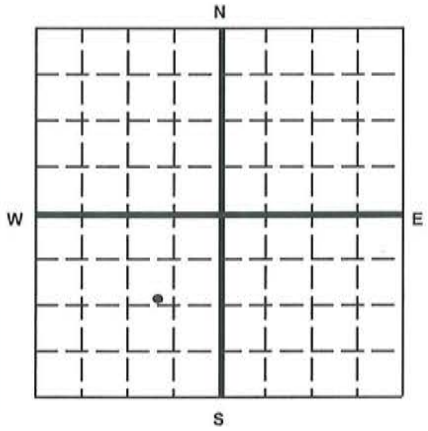
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1200 ft. frm (N/S) N Line of quarter section and 950 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 28S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
N/A	N/A	NA	NA	N/A

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	5.74					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	NA					
Sacks of Cement To Be Used (each plug)	59.2	90.4					
Slurry Volume To Be Pumped (cu. ft.)	75.9	115.9					
Calculated Top of Plug (ft.)	650-EST	5					
Measured Top of Plug (if tagged ft.)	650-EST	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2227	650-estimated		
650-estimated	5		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

Paperwork Reduction Act Notice

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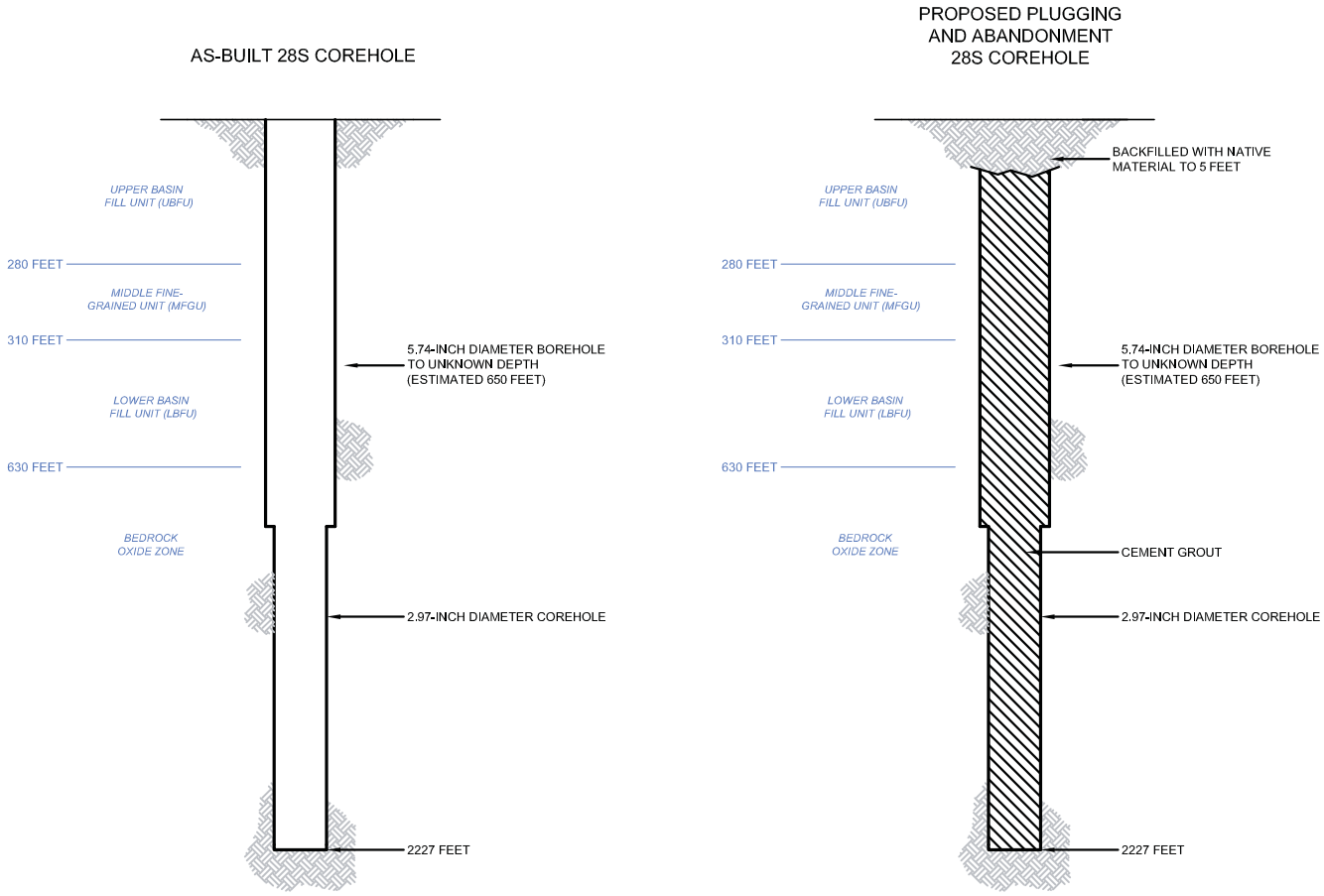


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

28S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\28S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

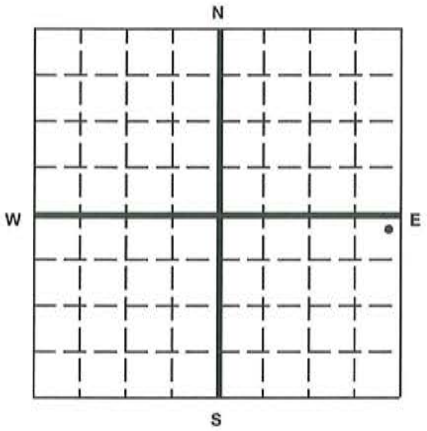
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of NE 1/4 of NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 170 ft. frm (N/S) N Line of quarter section and 130 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 53S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
NA	NA	NA	NA	NA

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97 est	5					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	NA					
Sacks of Cement To Be Used (each plug)	40.6	35.6					
Slurry Volume To Be Pumped (cu. ft.)	52.01	45.68					
Calculated Top of Plug (ft.)	340	5					
Measured Top of Plug (if tagged ft.)	340	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
1421	340		
340	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

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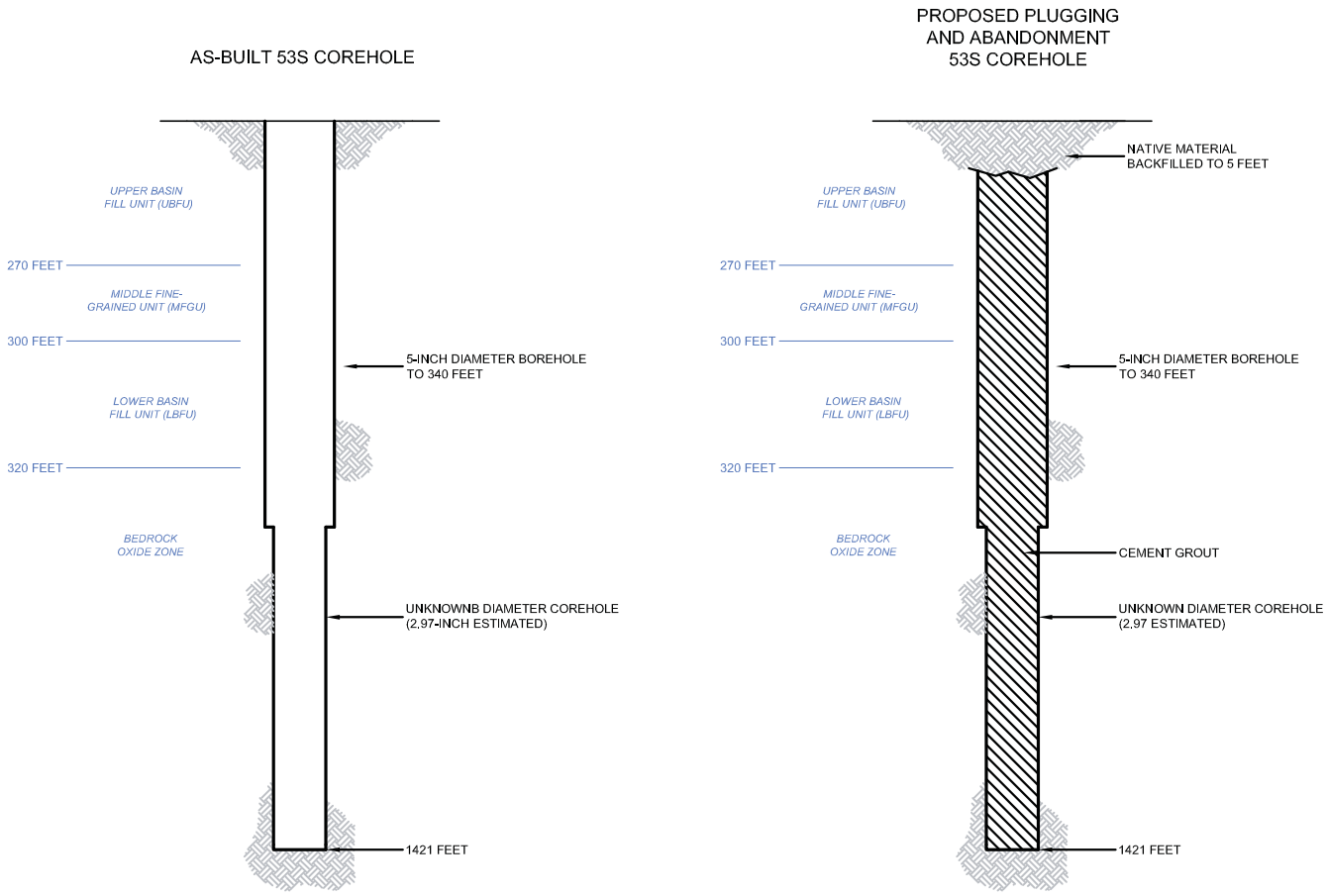

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HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

53S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

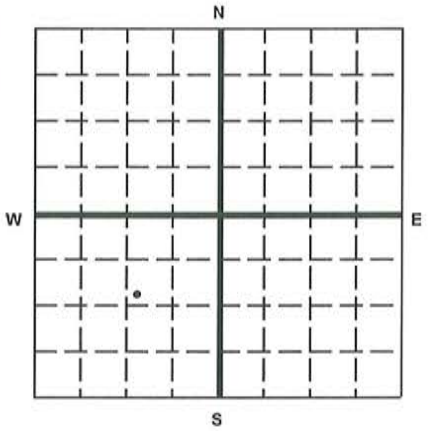
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1200 ft. frm (N/S) N Line of quarter section and 1220 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 94S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
4	10.79-EST.	0	555 est	5 est

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97est	3 est					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	560 est					
Sacks of Cement To Be Used (each plug)	55.5	21.2					
Slurry Volume To Be Pumped (cu. ft.)	71.11	27.24					
Calculated Top of Plug (ft.)	560 est	5					
Measured Top of Plug (if tagged ft.)	560 est	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2038	560 est		
560 est	5		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

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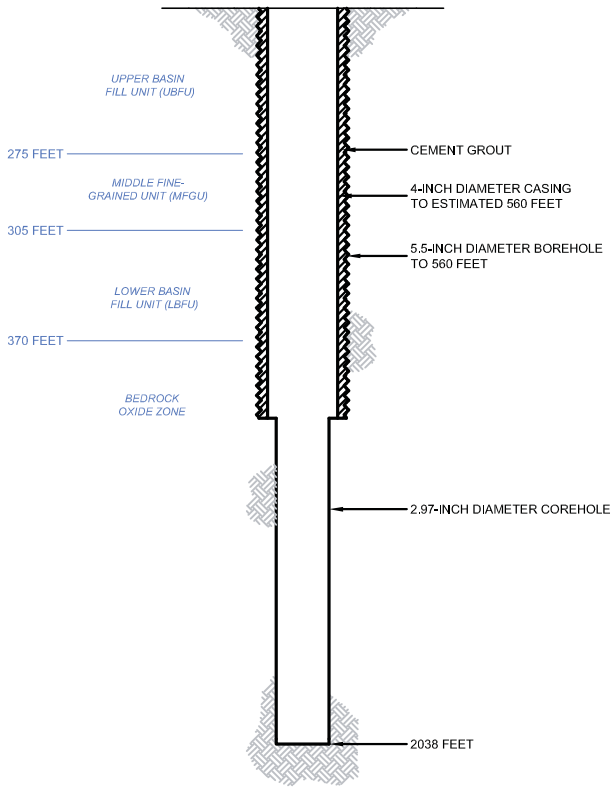

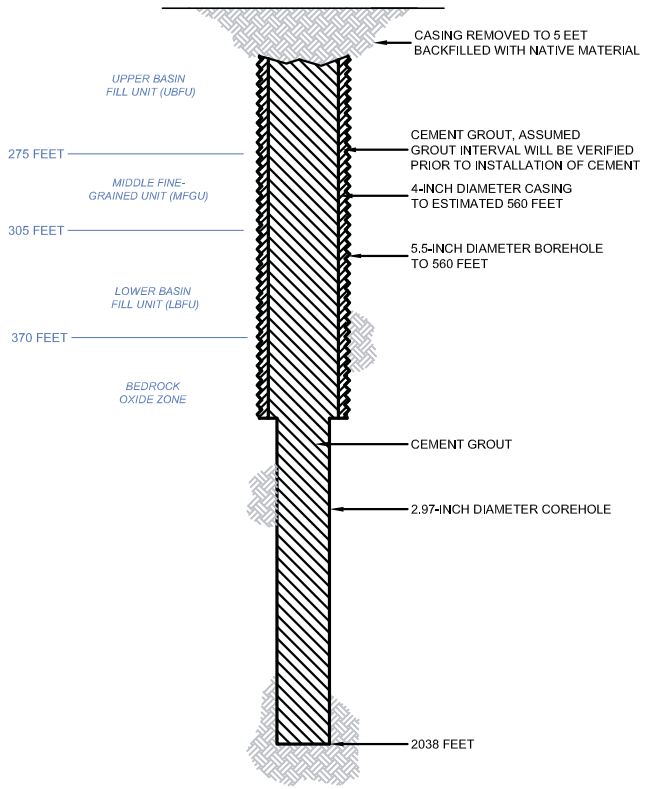

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

94S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

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OMB No. 2040-0042 Approval Expires 11/30/2014

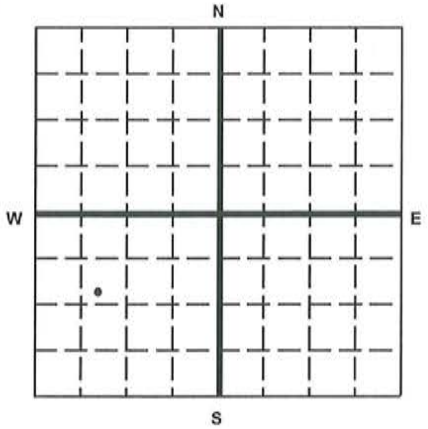
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SW 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1180 ft. frm (N/S) N Line of quarter section and 920 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 95S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
NA	NA	NA	NA	NA

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	5 est					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	590					
Sacks of Cement To Be Used (each plug)	47	62.2					
Slurry Volume To Be Pumped (cu. ft.)	60.23	79.8					
Calculated Top of Plug (ft.)	590 est	5					
Measured Top of Plug (if tagged ft.)	590 est	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
1842	590		
590	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

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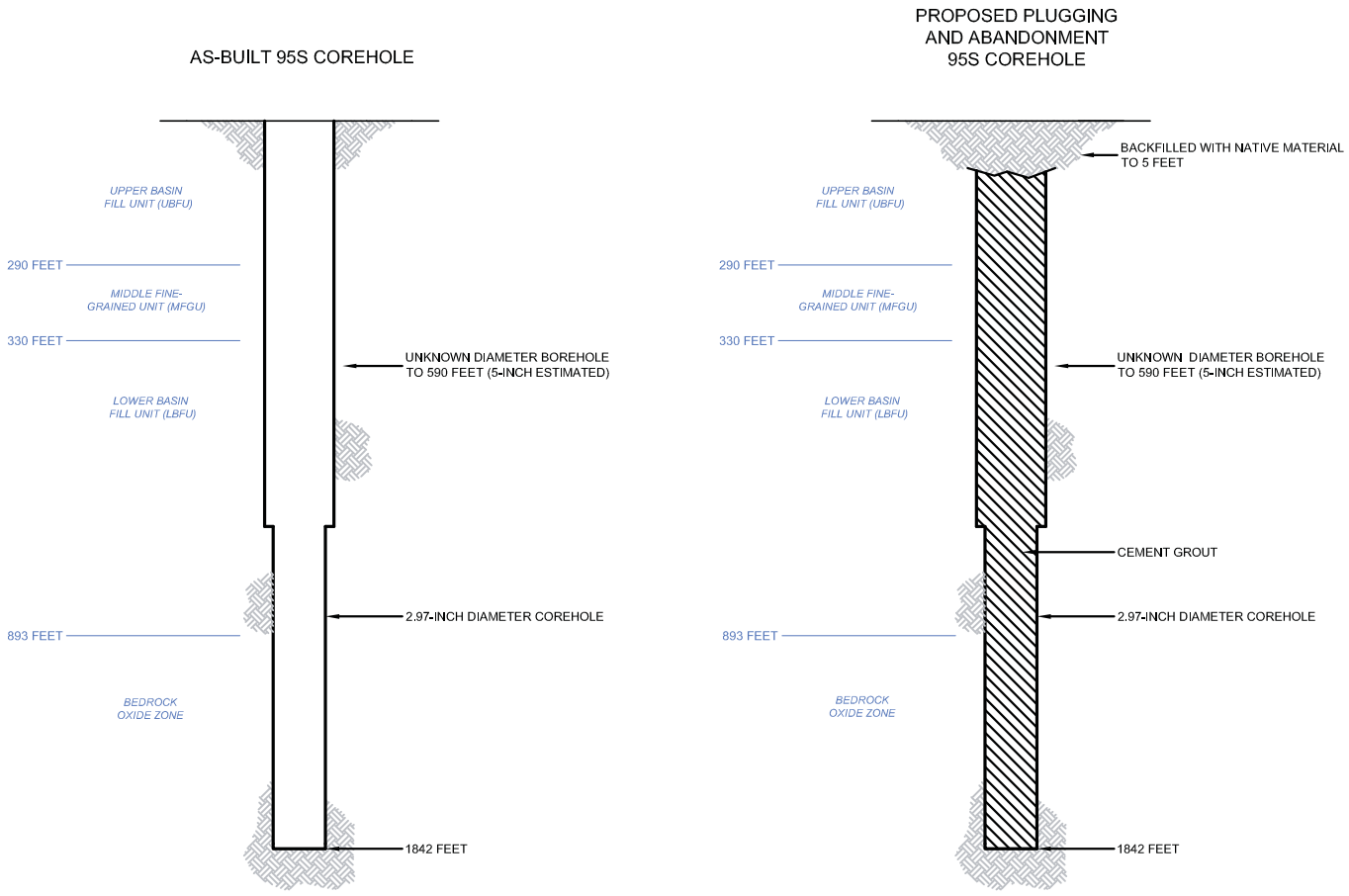

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

95S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

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OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
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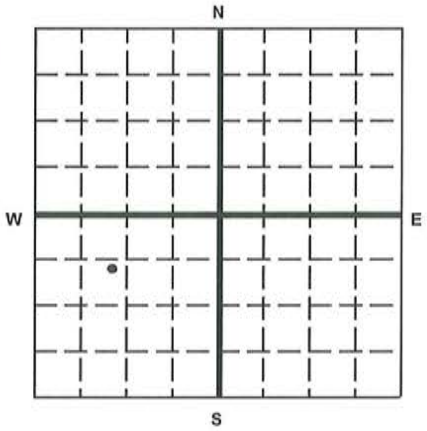
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 730 ft. frm (N/S) N Line of quarter section and 1175 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 133S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-est.	0	555	5
5.5	13.70-est.	0	40	6.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	560					
Sacks of Cement To Be Used (each plug)	62.2	21.2					
Slurry Volume To Be Pumped (cu. ft.)	79.72	27.24					
Calculated Top of Plug (ft.)	560	5					
Measured Top of Plug (if tagged ft.)	560	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2217	560		
560	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Dan Johnson, VP Environment and Technical Services		09/07/2012

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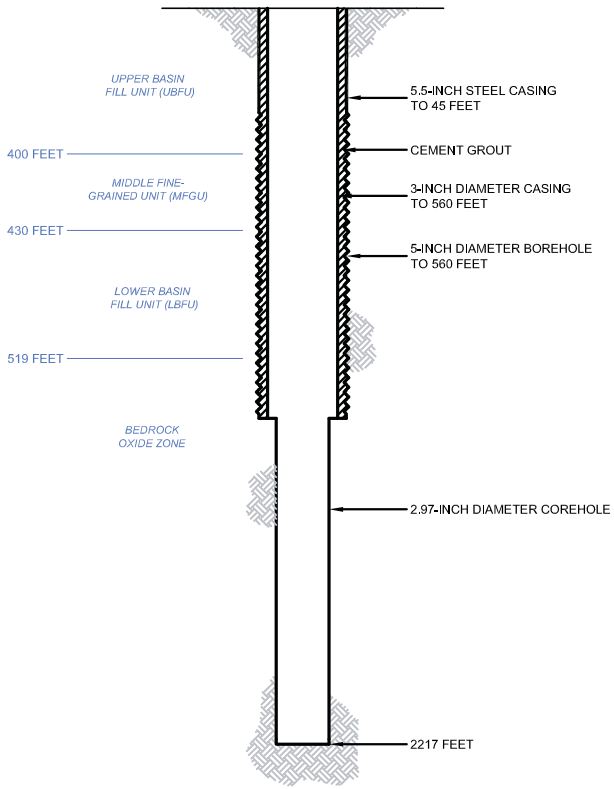
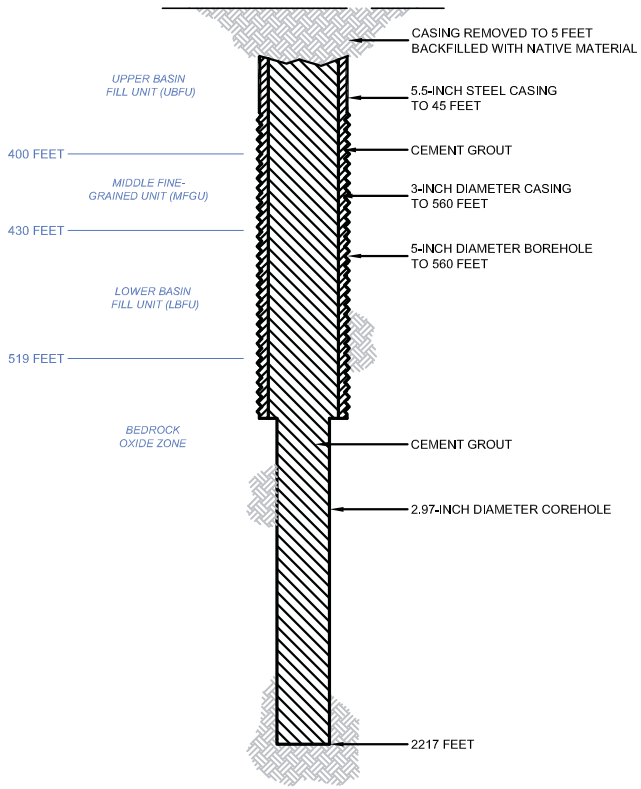




HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

133S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\133S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

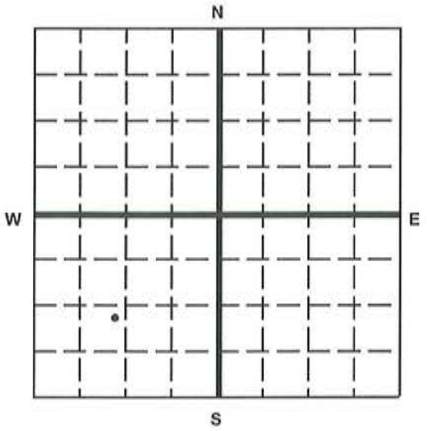
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of NE 1/4 of SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1040 ft. frm (N/S) S Line of quarter section and 1190 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 135MF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-est.	0	371	5
5.5	13.70-est.	0	60	6.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97-est	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	376					
Sacks of Cement To Be Used (each plug)	64.5	14.2					
Slurry Volume To Be Pumped (cu. ft.)	82.72	18.21					
Calculated Top of Plug (ft.)	376	5					
Measured Top of Plug (if tagged ft.)	376	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2095.5	376		
376	5		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

Paperwork Reduction Act Notice

The public reporting and record keeping burden for this collection of information is estimated to average 4.5 hours for operators of Class I hazardous wells, 1.5 hours for operators of Class I non-hazardous wells, 3 hours for operators of Class II wells, and 1.5 hours for operators of Class III wells.
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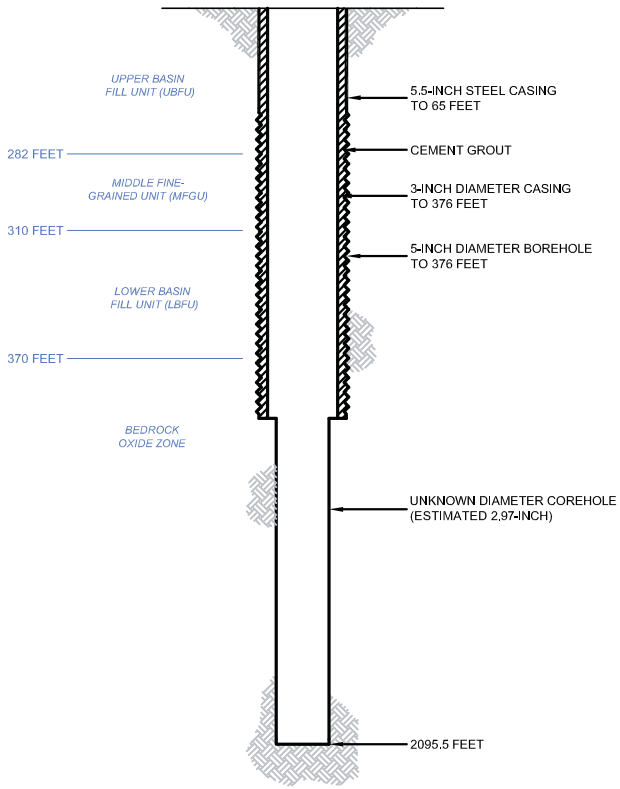
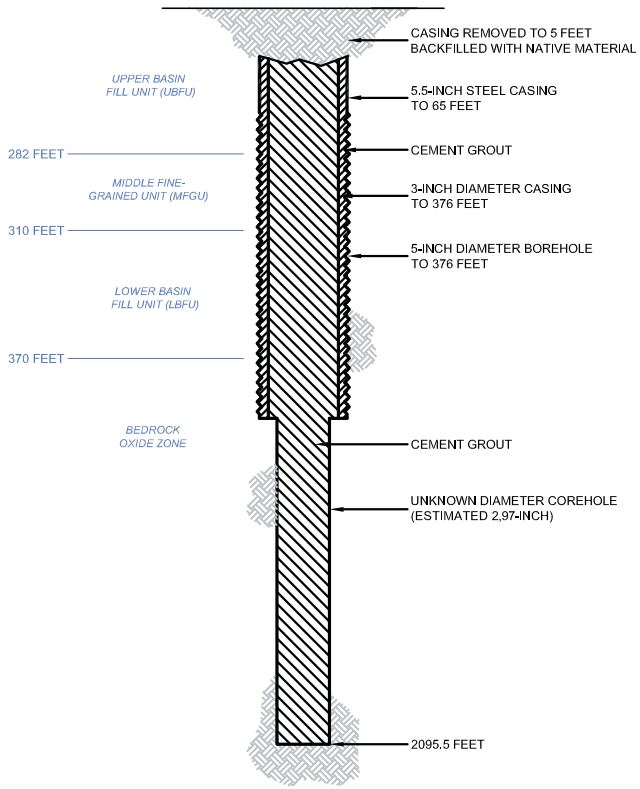




HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

135MF COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\135MF_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

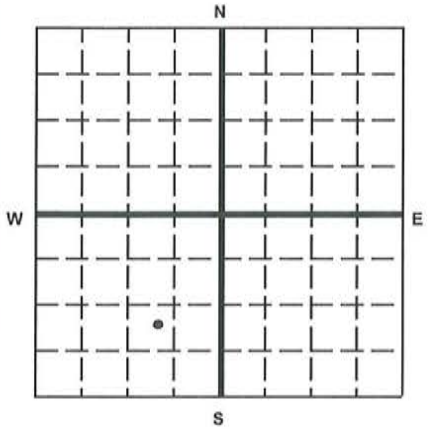
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of NW 1/4 of SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1020 ft. frm (N/S) S Line of quarter section and 970 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 145MF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-est.	0	395	5
5	13.70-est.	0	55	6.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	400					
Sacks of Cement To Be Used (each plug)	66.4	15.1					
Slurry Volume To Be Pumped (cu. ft.)	85.15	19.39					
Calculated Top of Plug (ft.)	400	5					
Measured Top of Plug (if tagged ft.)	400	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2170	400		
400	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

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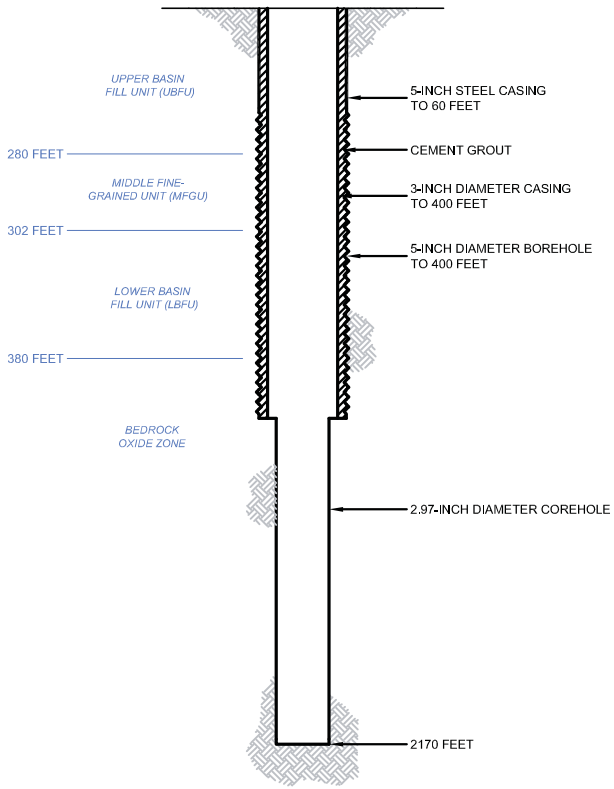

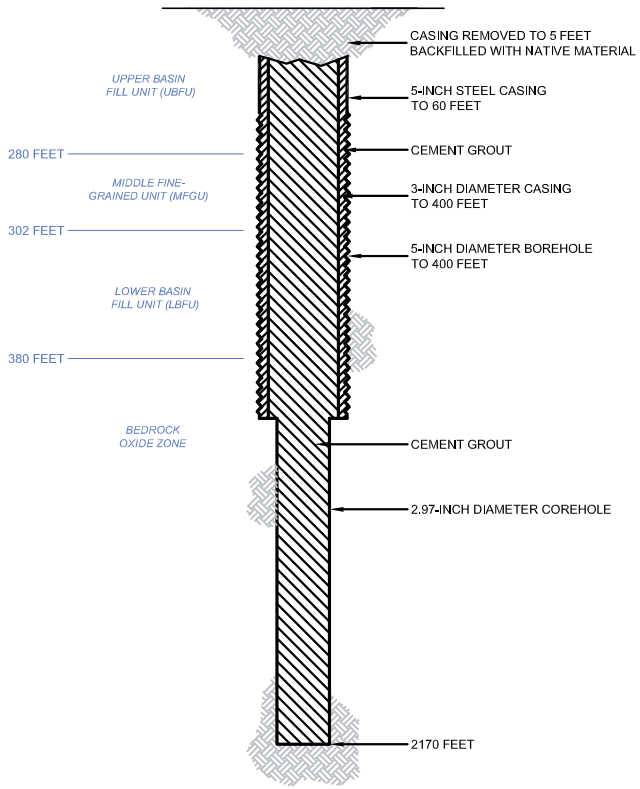

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

145MF COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

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OMB No. 2040-0042 Approval Expires 11/30/2014

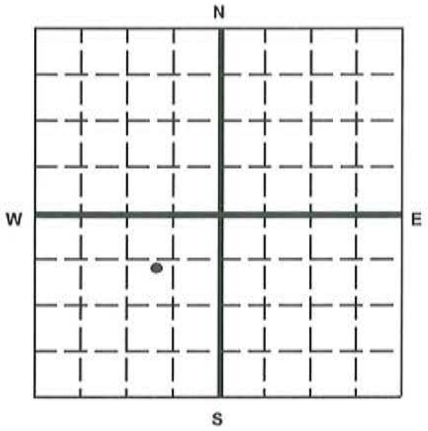
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 770 ft. frm (N/S) N Line of quarter section and 950 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 149S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-est.	0	596	5
5	13.70-est.	0	35	6.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	601					
Sacks of Cement To Be Used (each plug)	57.8	22.8					
Slurry Volume To Be Pumped (cu. ft.)	74.16	29.26					
Calculated Top of Plug (ft.)	601	5					
Measured Top of Plug (if tagged ft.)	601	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2142.5	601		
601	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Dan Johnson, VP Environment and Technical Services		09/07/2012

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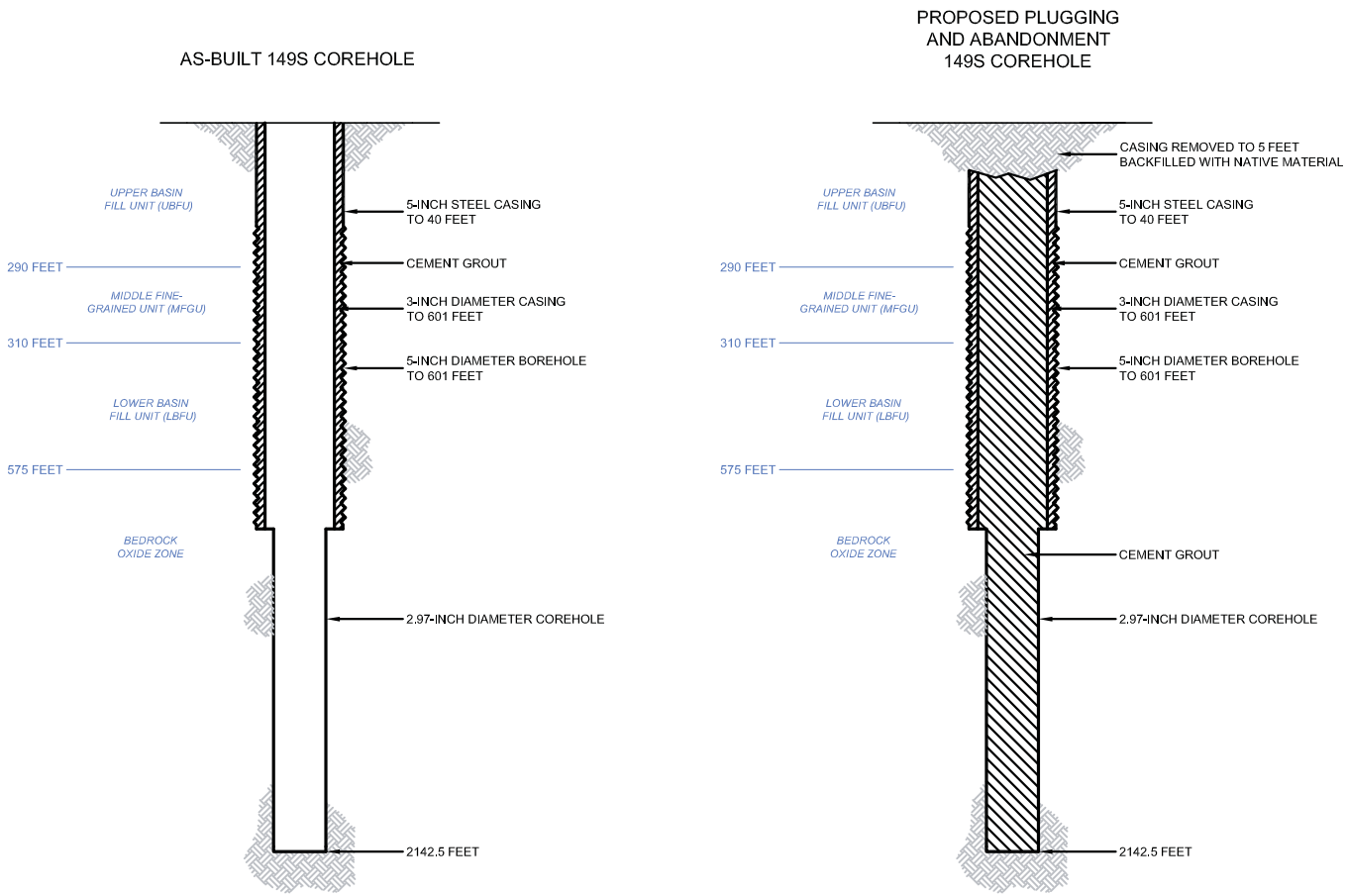


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

149S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\149S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

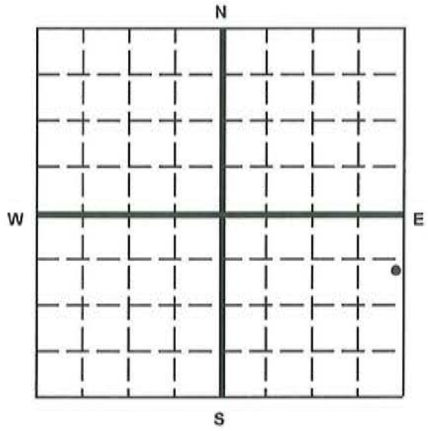
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of SE 1/4 of NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 760 ft. frm (N/S) N Line of quarter section and 80 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 162S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	348	5
5	13.70-EST.	0	45	6.25 est

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	300					
Sacks of Cement To Be Used (each plug)	25.9	11.3					
Slurry Volume To Be Pumped (cu. ft.)	33.2	14.5					
Calculated Top of Plug (ft.)	300	5					
Measured Top of Plug (if tagged ft.)	300	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
990	300		
300	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

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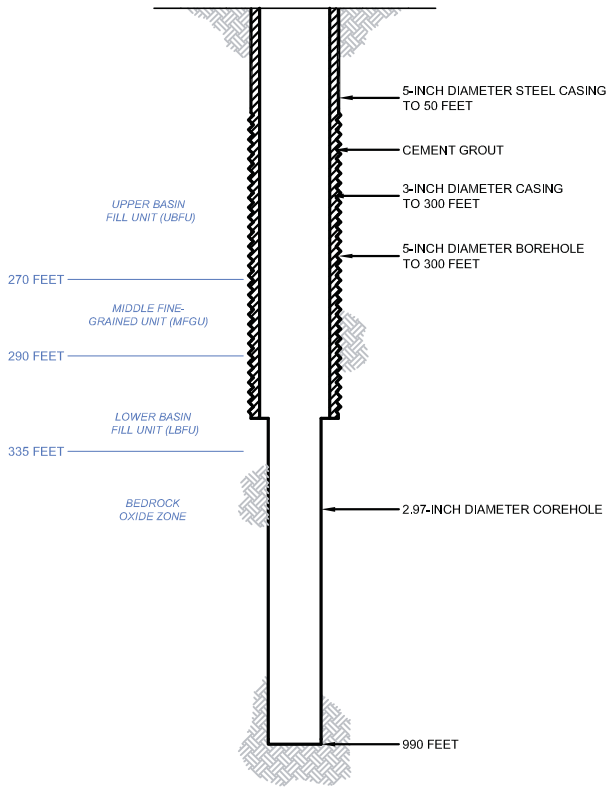

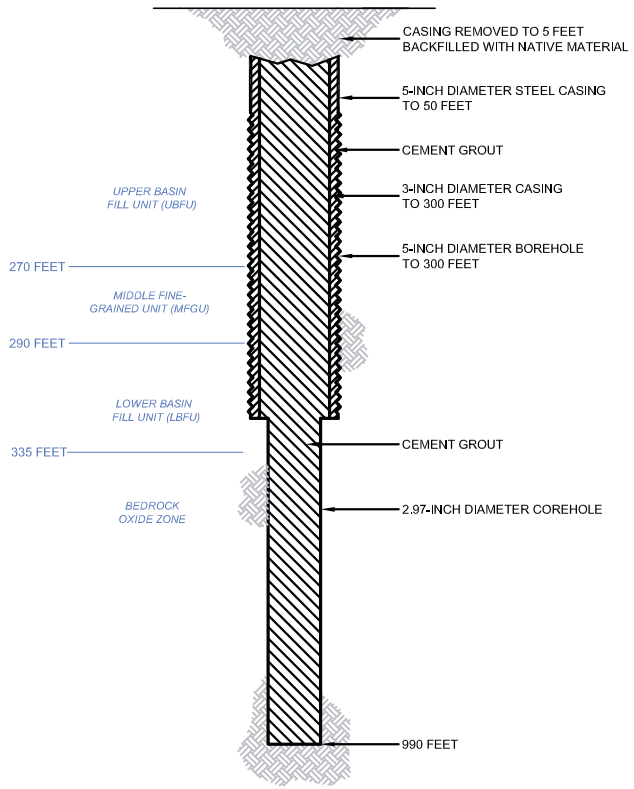

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

162S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\162S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

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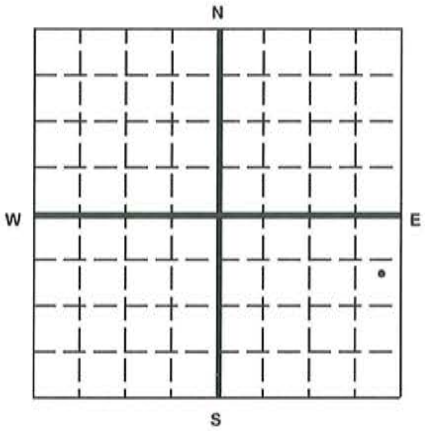

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of SE 1/4 of NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 770 ft. frm (N/S) N Line of quarter section and 330 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 325S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	327.5 est	5
5.6	13.70-EST.	0	35	6.5-EST

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97 est	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	332.5					
Sacks of Cement To Be Used (each plug)	28.5	12.5					
Slurry Volume To Be Pumped (cu. ft.)	36.6	16.1					
Calculated Top of Plug (ft.)	332.5	5					
Measured Top of Plug (if tagged ft.)	332.5	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
1093	332.5		
332.5	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Dan Johnson, VP Environment and Technical Services	Dan Johnson	09/07/2012

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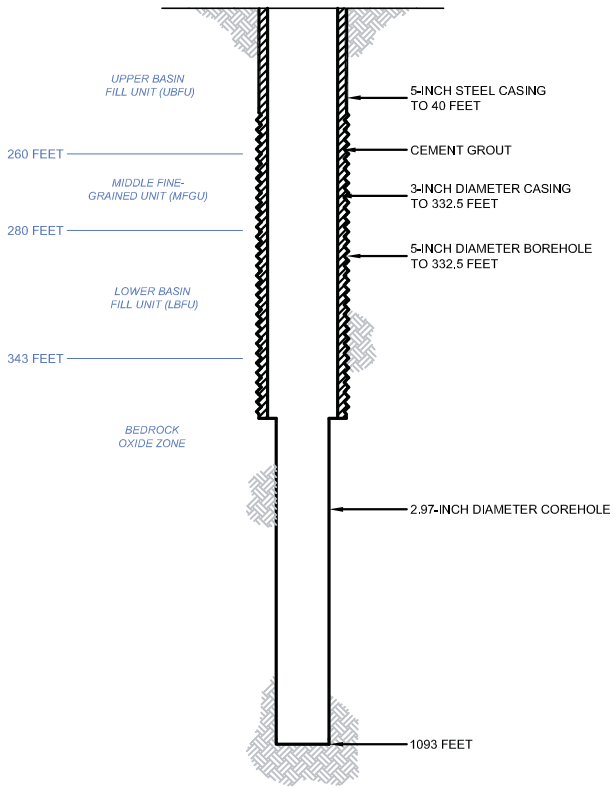
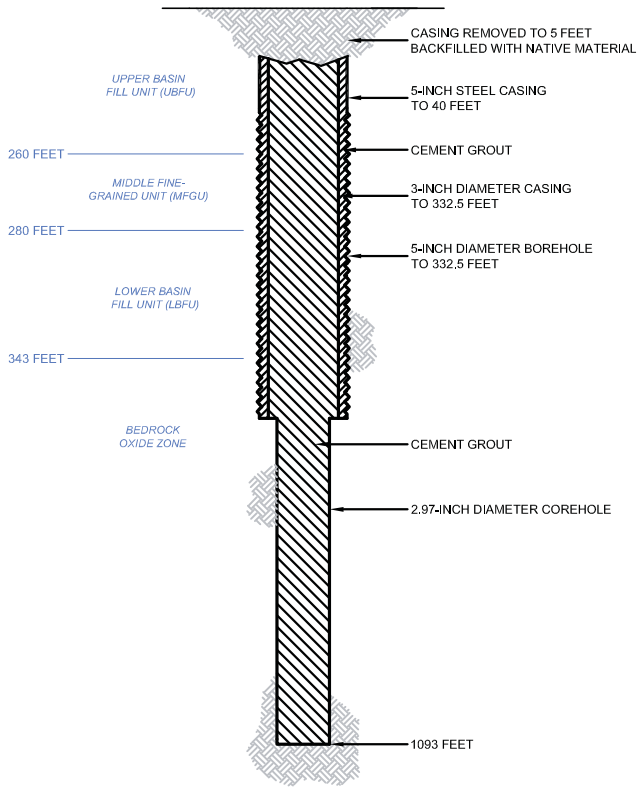




HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

325S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\325S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

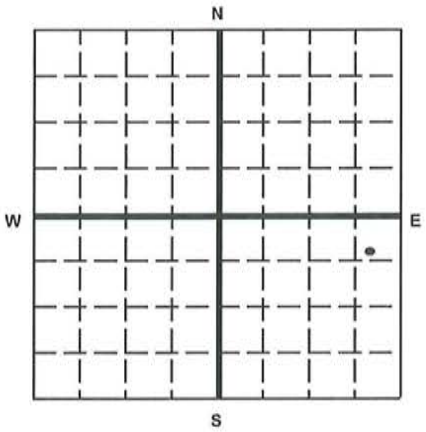
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SW 1/4 of NE 1/4 of NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 560 ft. frm (N/S) N Line of quarter section and 450 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 337S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	295	5
5	13.70-EST.	0	40	6.5-EST.

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97 est	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	300					
Sacks of Cement To Be Used (each plug)	40.1	11.3					
Slurry Volume To Be Pumped (cu. ft.)	51.38	14.48					
Calculated Top of Plug (ft.)	300	5					
Measured Top of Plug (if tagged ft.)	300	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
1368	300		
300	5		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

Paperwork Reduction Act Notice

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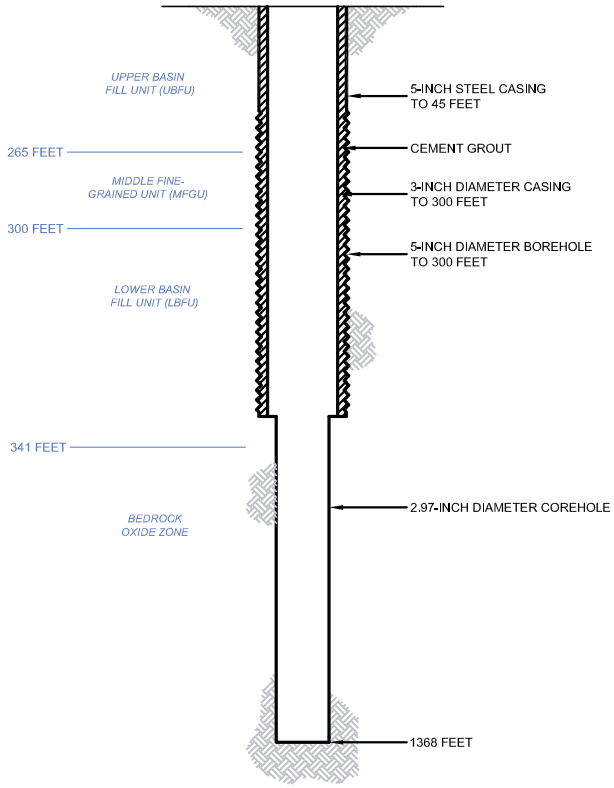
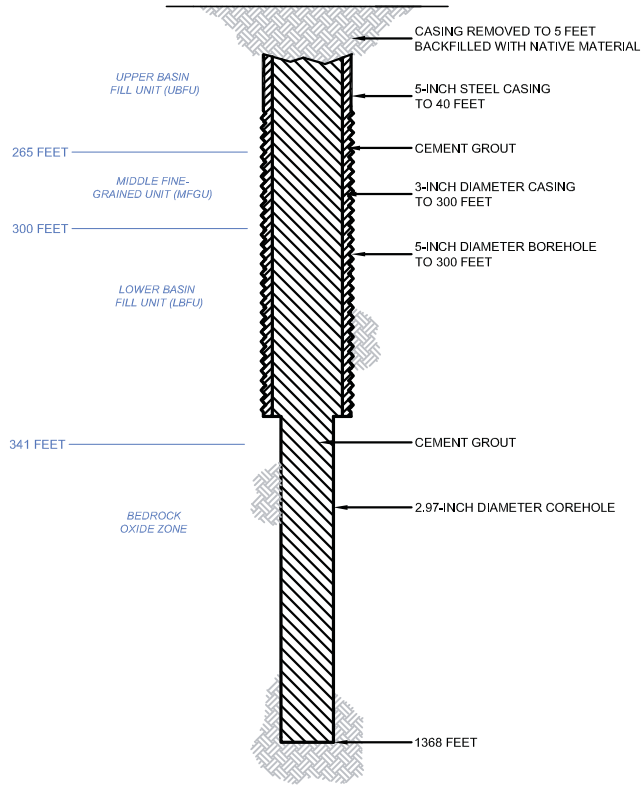




HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

337S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\337S_ABANDON.DWG

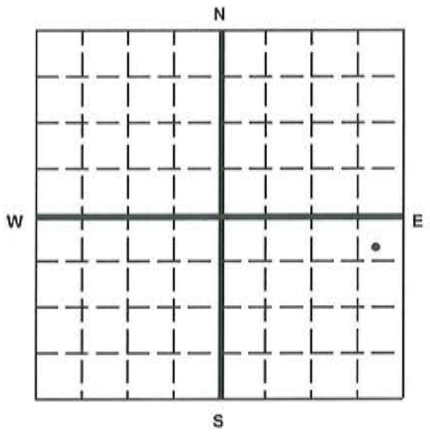
OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SW 1/4 of NE 1/4 of NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 350 ft. frm (N/S) N Line of quarter section and 335 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 338S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	325	5
5.6	13.70-EST.	0	35	6.5est

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	330						
Sacks of Cement To Be Used (each plug)	12.4						
Slurry Volume To Be Pumped (cu. ft.)	15.95						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
330	5		

Estimated Cost to Plug Wells

$13,715

Certification

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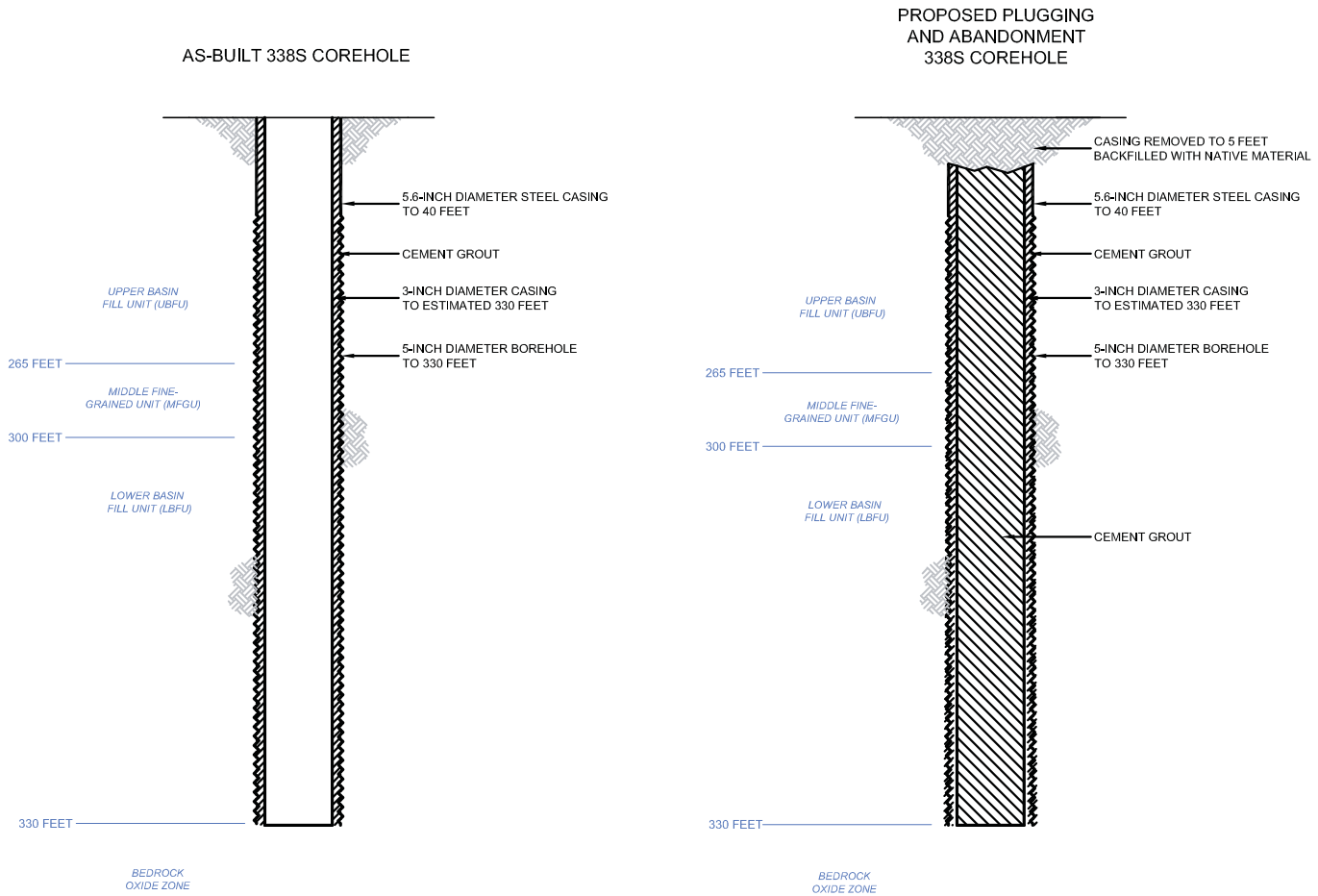


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

338S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLA\ABANDON\338S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

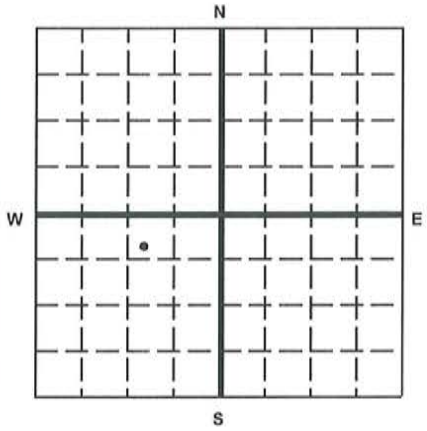
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SW 1/4 of NW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 530 ft. frm (N/S) N Line of quarter section and 1090 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 356S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
5.6	13.7-EST.	0	40	6.5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	5					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	473					
Sacks of Cement To Be Used (each plug)	60.8	49.8					
Slurry Volume To Be Pumped (cu. ft.)	78	63.8					
Calculated Top of Plug (ft.)	473	5					
Measured Top of Plug (if tagged ft.)	473	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2094	473		
473	5		

Estimated Cost to Plug Wells

$13,715

Certification

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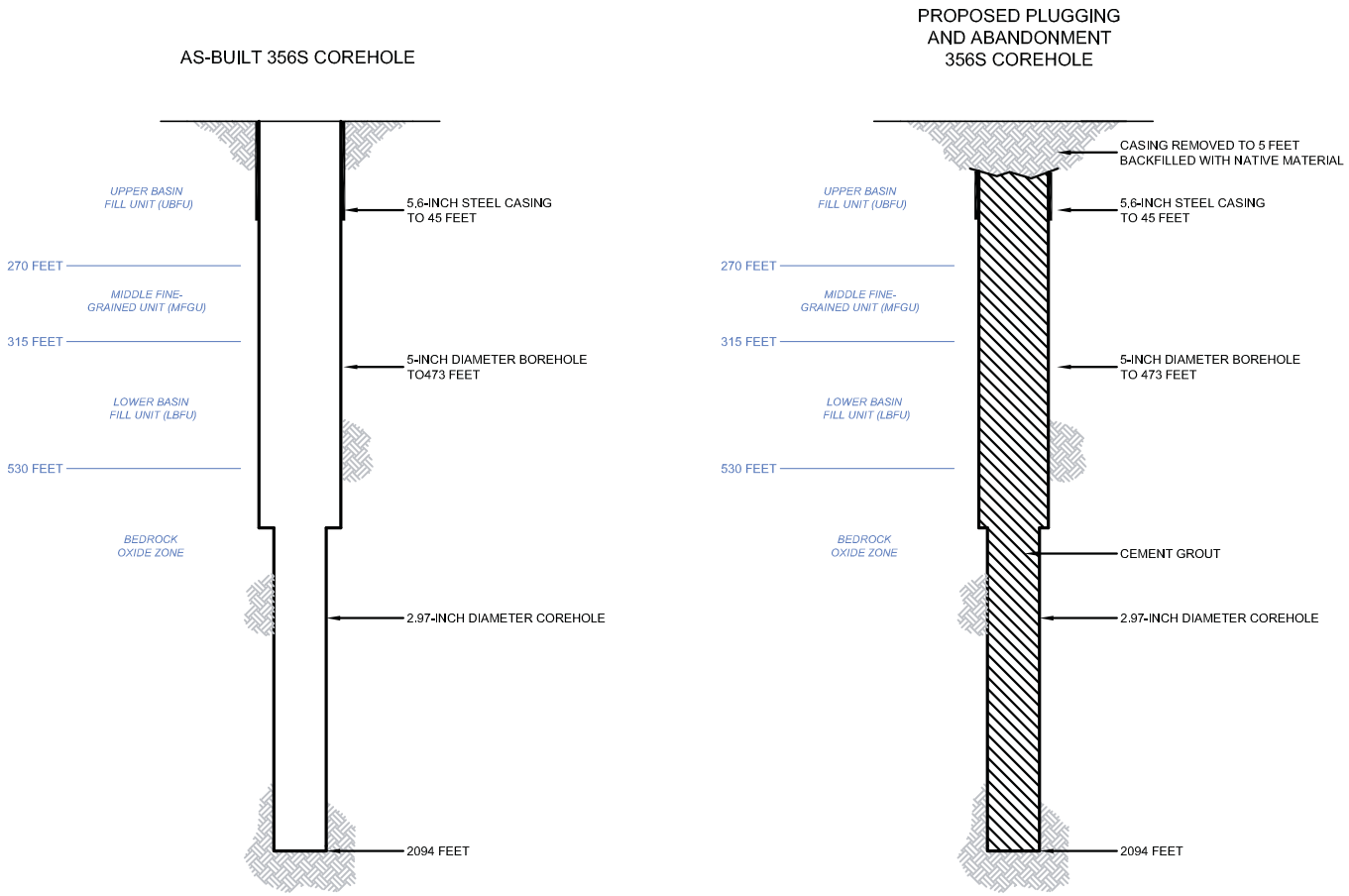


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

356S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\356S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

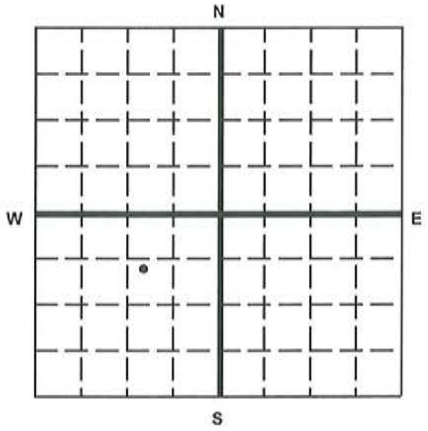
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 730 ft. frm (N/S) N Line of quarter section and 1220 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 357S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
5.6	13.70	0	40	6.5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	5					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	455					
Sacks of Cement To Be Used (each plug)	68.5	47.9					
Slurry Volume To Be Pumped (cu. ft.)	87.8	61.2					
Calculated Top of Plug (ft.)	455	5					
Measured Top of Plug (if tagged ft.)	455	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2280	455		
455	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Dan Johnson, VP Environment and Technical Services		09/07/2012

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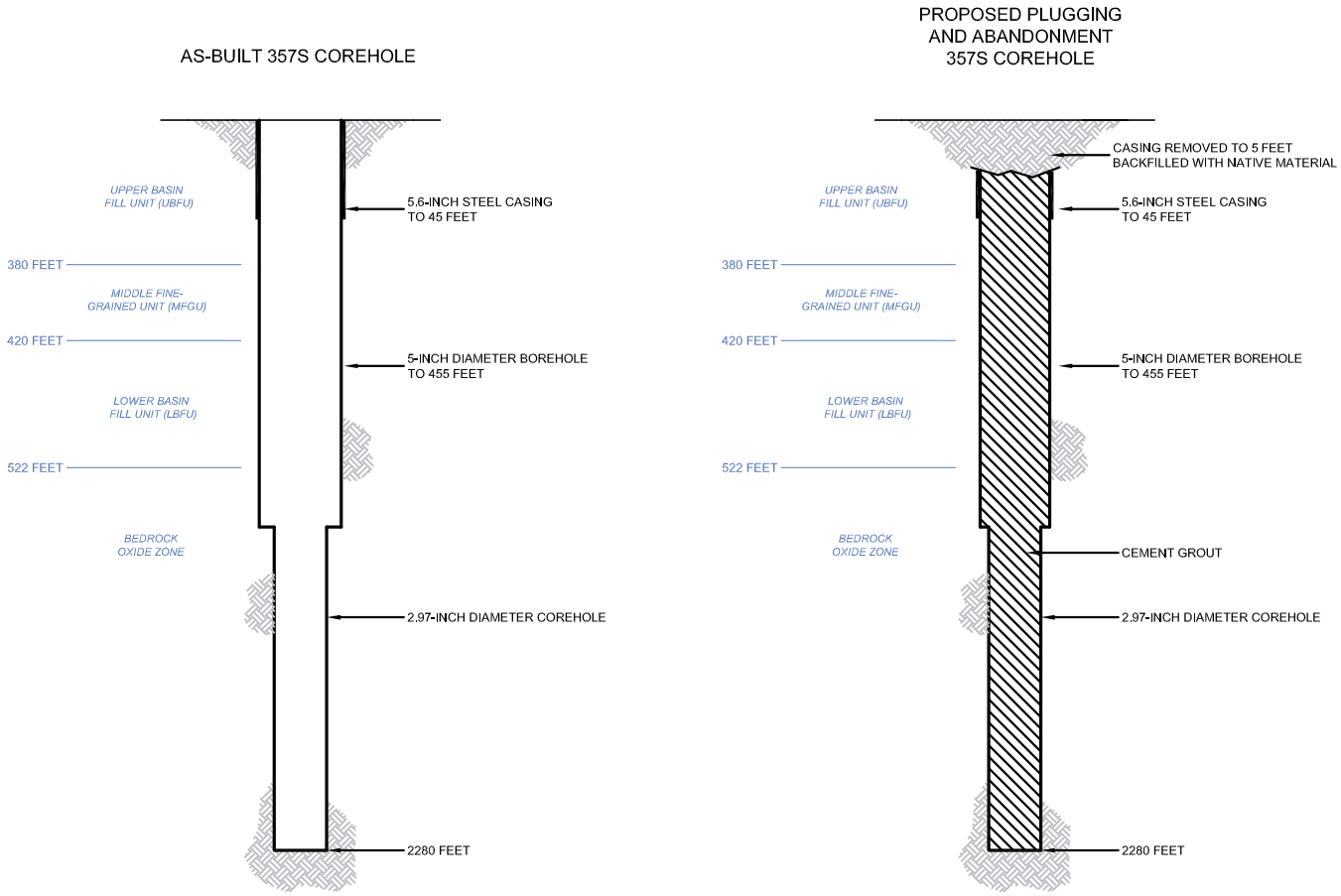


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

357S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\357S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

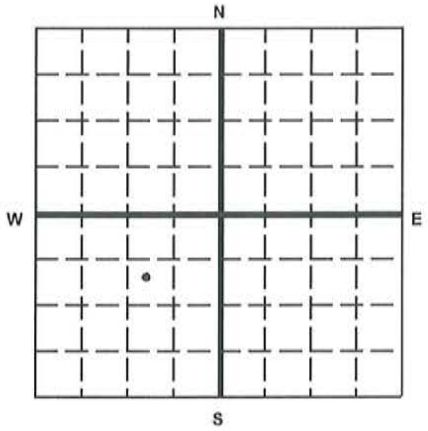
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 950 ft. frm (N/S) N Line of quarter section and 1090 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 366S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
5.6	13.70-est	0	40	6.5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5						
Depth to Bottom of Tubing or Drill Pipe (ft	425 est						
Sacks of Cement To Be Used (each plug)	44.7						
Slurry Volume To Be Pumped (cu. ft.)	57.3						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
425	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

Paperwork Reduction Act Notice

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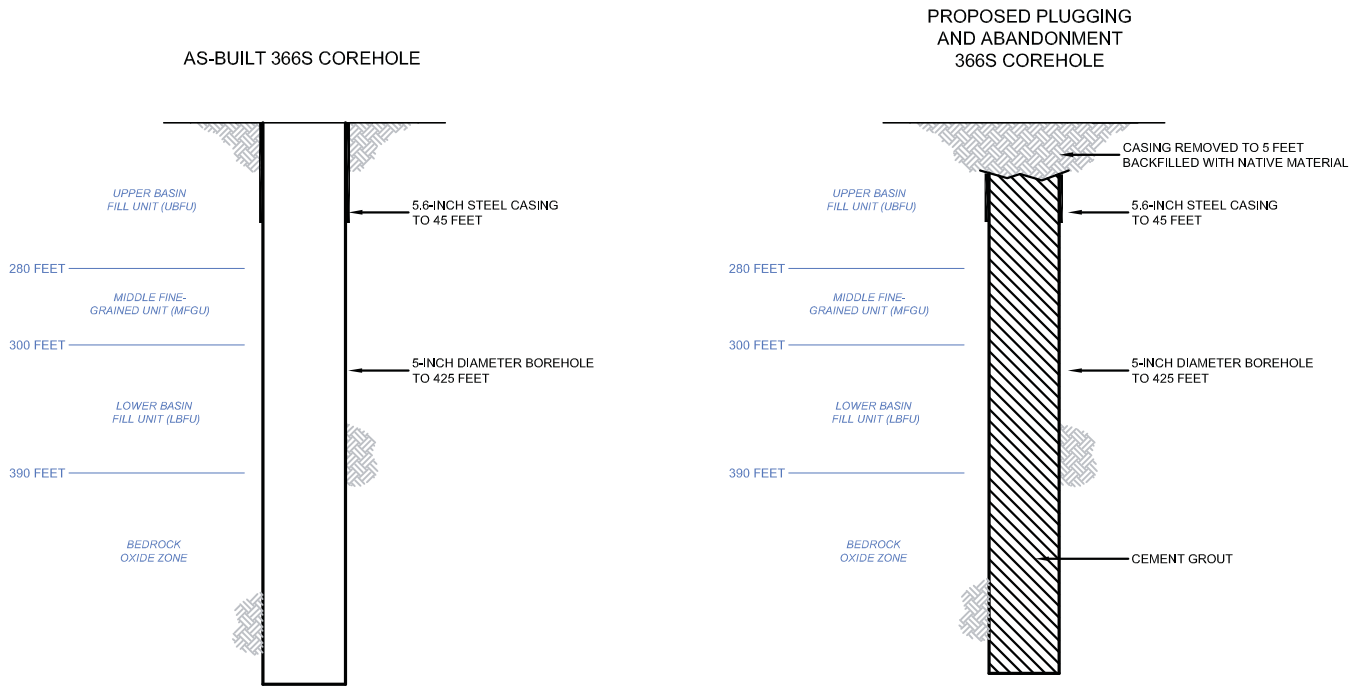

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HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

366S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

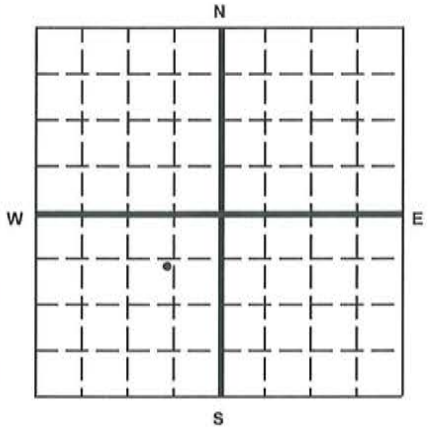
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 740 ft. frm (N/S) N Line of quarter section and 710 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 414S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	13.70	0	375	5
5.6	13.70	0	45	6.5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	380					
Sacks of Cement To Be Used (each plug)	70.8	14.4					
Slurry Volume To Be Pumped (cu. ft.)	90.78	18.41					
Calculated Top of Plug (ft.)	380	5					
Measured Top of Plug (if tagged ft.)	380	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2267	380		
380	5		

Estimated Cost to Plug Wells

$13,715

Certification

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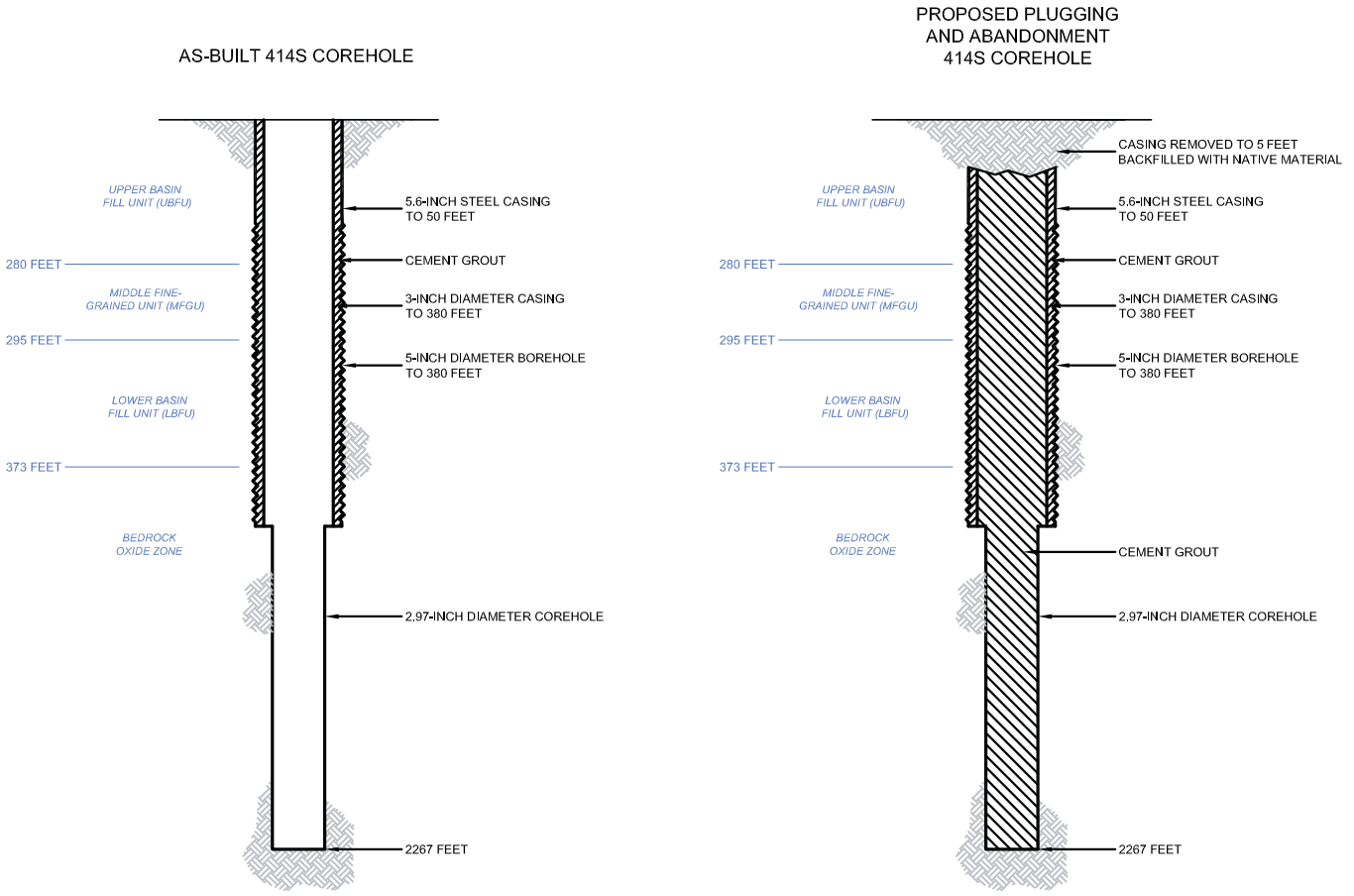

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HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

414S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

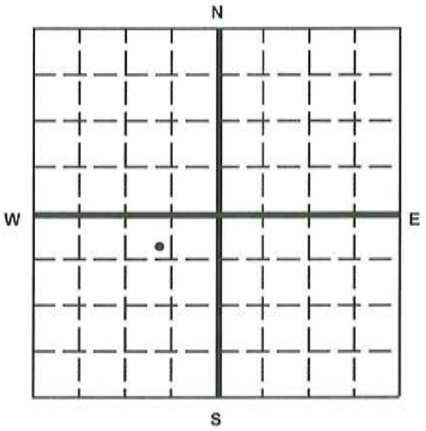
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SE 1/4 of NW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 520 ft. frm (N/S) N Line of quarter section and 830 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 415S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	275	5
5.6-est	13.70-EST.	0	35	6.5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	2.97	3					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	280					
Sacks of Cement To Be Used (each plug)	66.1	10.5					
Slurry Volume To Be Pumped (cu. ft.)	84.7	13.5					
Calculated Top of Plug (ft.)	280	5					
Measured Top of Plug (if tagged ft.)	280	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
2042	280		
280	5		

Estimated Cost to Plug Wells

$13,715

Certification

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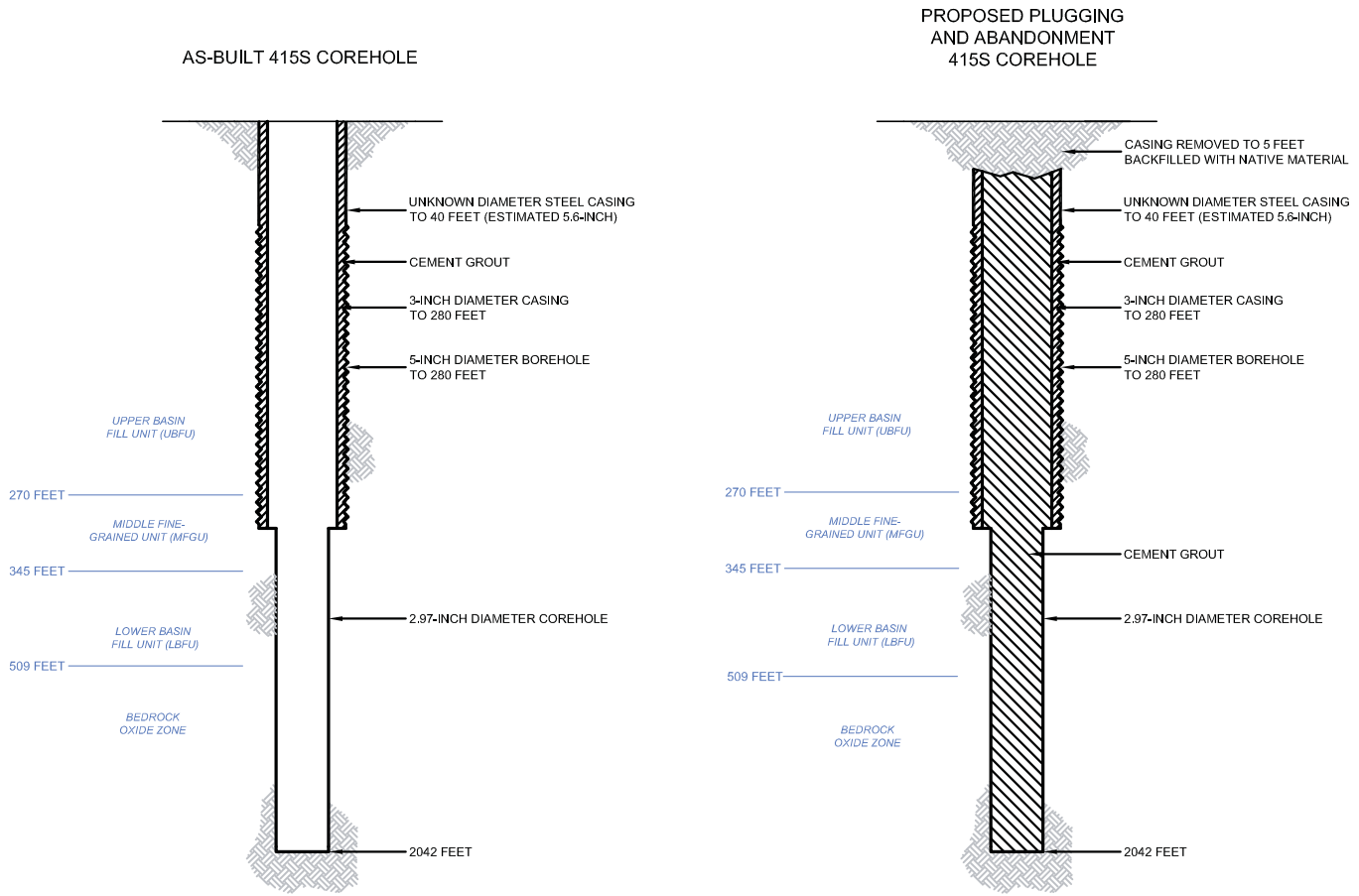

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HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

415S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
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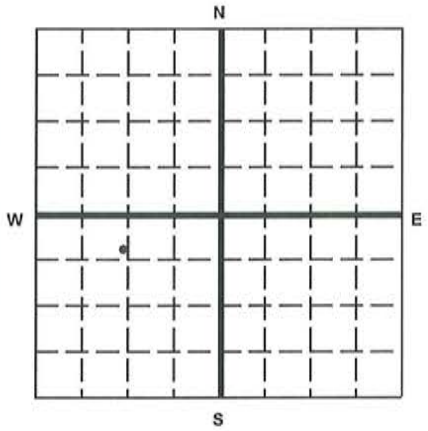
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SE 1/4 of NE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 540 ft. frm (N/S) N Line of quarter section and 1260 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 447S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
4-est	10.79-EST	0	588-EST	5
5.6	13.70-EST	0	35	6.5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	4						
Depth to Bottom of Tubing or Drill Pipe (ft	593-EST						
Sacks of Cement To Be Used (each plug)	40						
Slurry Volume To Be Pumped (cu. ft.)	51.3						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
593	5		

Estimated Cost to Plug Wells

$13,715

Certification

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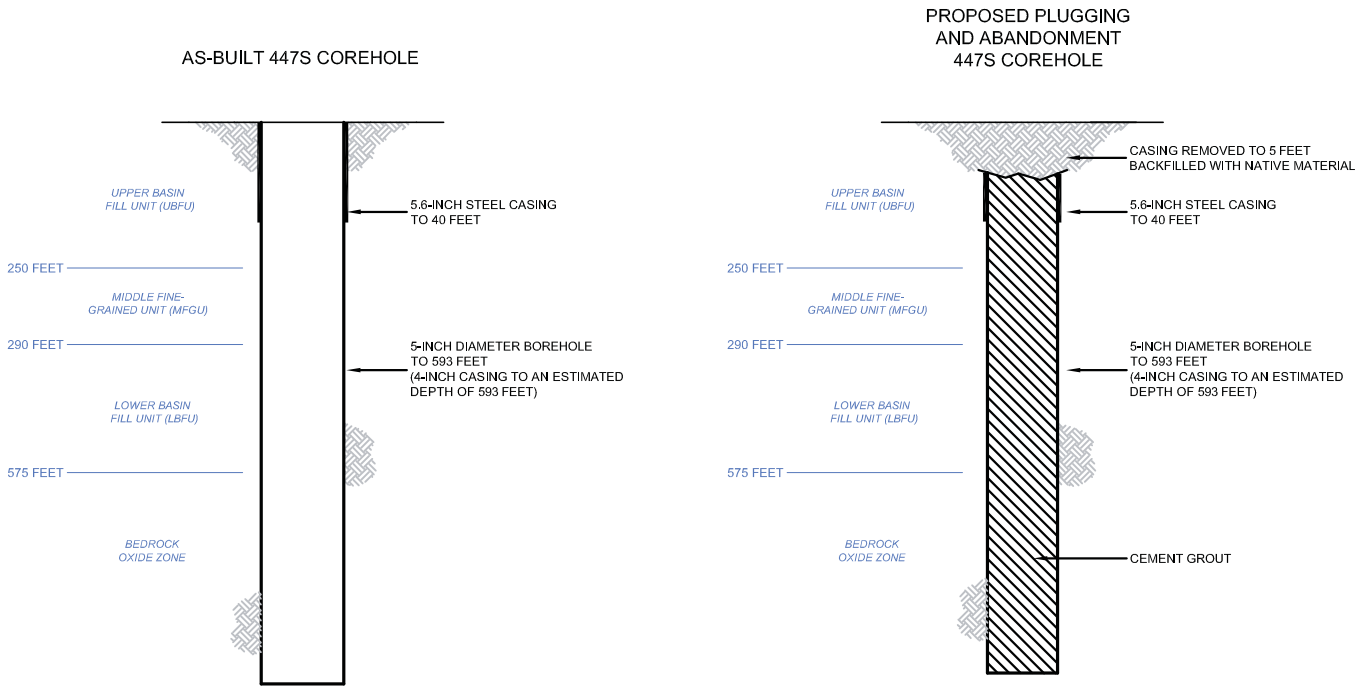

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

447S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

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OMB No. 2040-0042 Approval Expires 11/30/2014

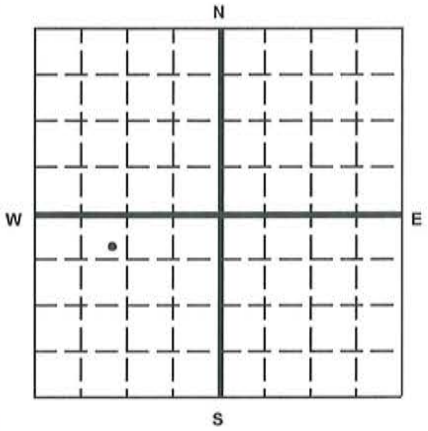
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SE 1/4 of NE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 530 ft. frm (N/S) N Line of quarter section and 1060 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 448S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	745	5
5.6est	13.70-EST.	0	35	6.75

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	750						
Sacks of Cement To Be Used (each plug)	28.5						
Slurry Volume To Be Pumped (cu. ft.)	36.57						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
750	5		

Estimated Cost to Plug Wells

$13,715

Certification

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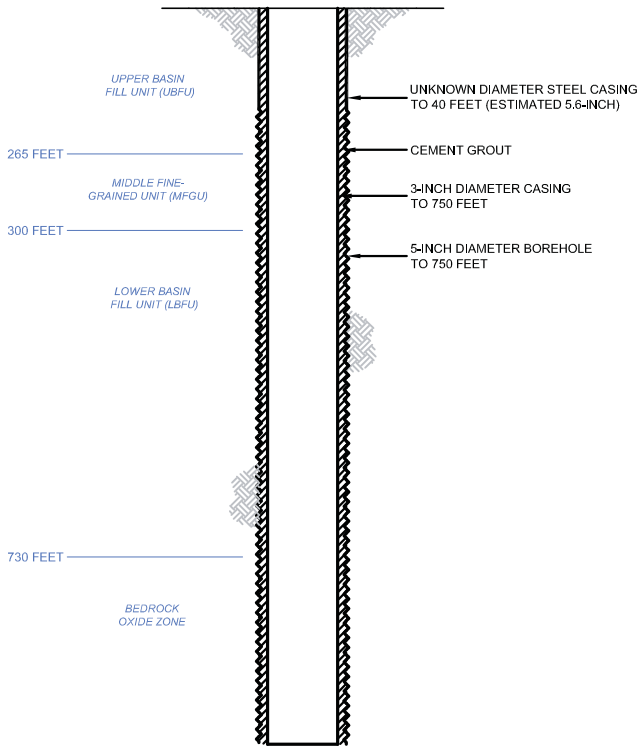

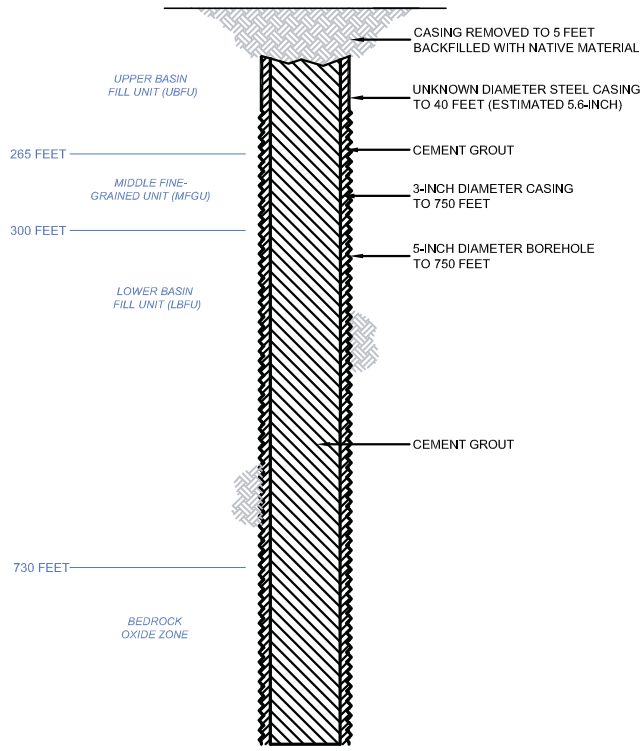

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

448S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

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OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
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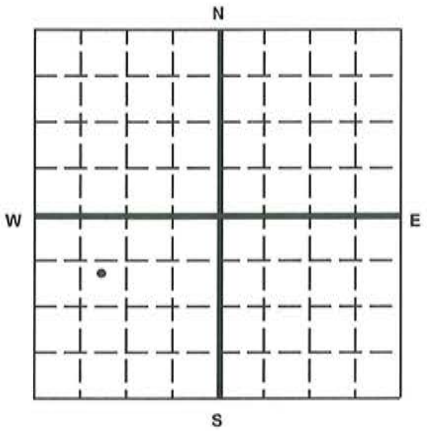

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 750 ft. frm (N/S) N Line of quarter section and 930 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 453S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	865	5
5.6est	13.70-EST	0	35	6.75

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	870						
Sacks of Cement To Be Used (each plug)	33.1						
Slurry Volume To Be Pumped (cu. ft.)	42.46						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
870	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

Paperwork Reduction Act Notice

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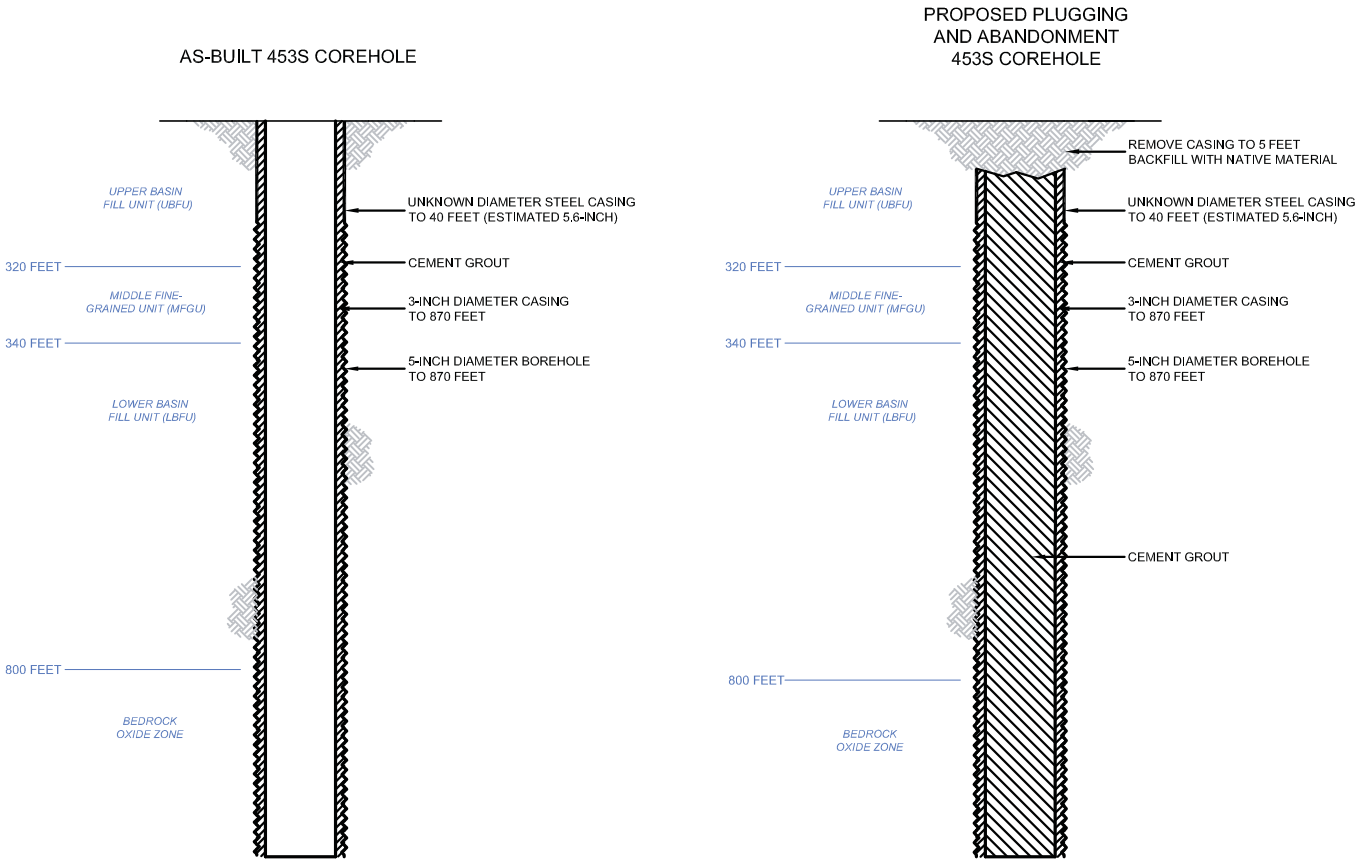


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

453S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON453S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

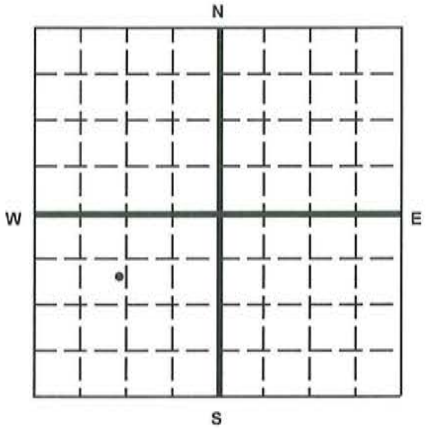
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 950 ft. frm (N/S) N Line of quarter section and 1280 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 454S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
4	10.79-EST.	0	398 - ESTIMATED	5
5.6	13.70-EST	0	35	6.5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	4						
Depth to Bottom of Tubing or Drill Pipe (ft	403 est						
Sacks of Cement To Be Used (each plug)	27.1						
Slurry Volume To Be Pumped (cu. ft.)	34.7						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
403	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Dan Johnson, VP Environment and Technical Services		09/07/2013

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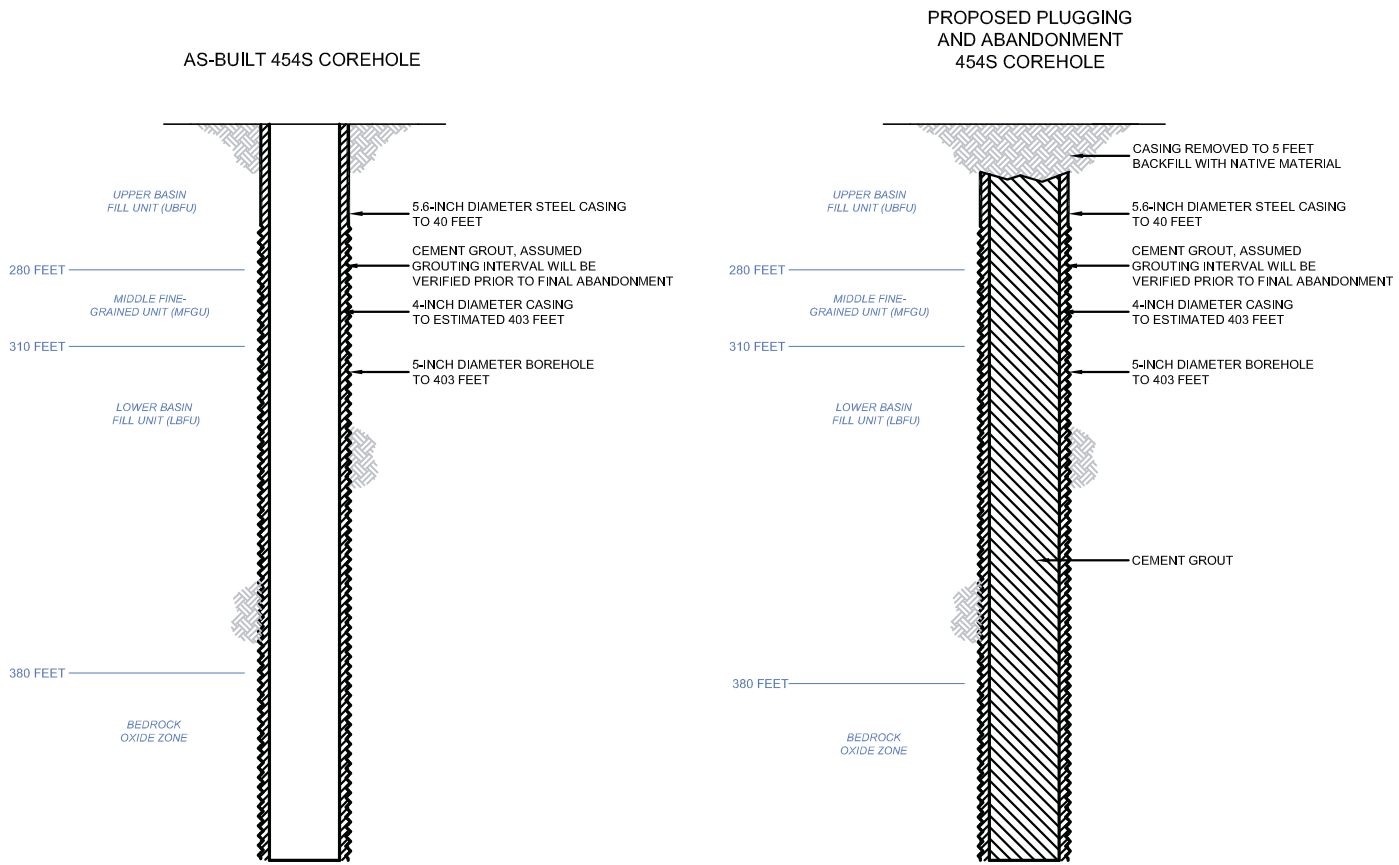


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

454S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLA\ABANDON454S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

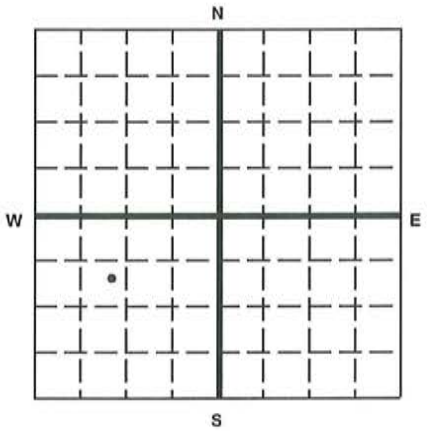
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 960 ft. frm (N/S) N Line of quarter section and 1060 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 455S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST	0	548 est	5
5.6	13.70-EST	0	35	7.88

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	553 est						
Sacks of Cement To Be Used (each plug)	21						
Slurry Volume To Be Pumped (cu. ft.)	26.9						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
553 est	5		

Estimated Cost to Plug Wells

$13,715

Certification

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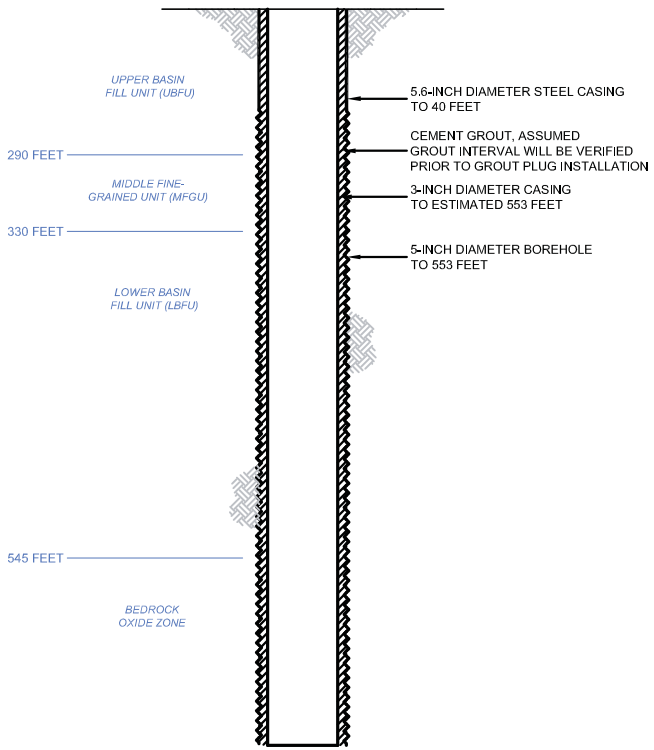

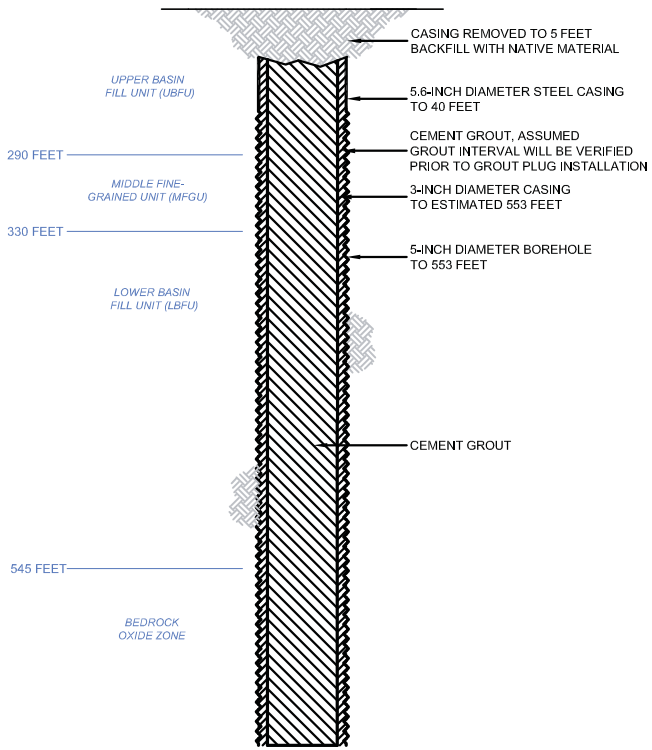

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

455S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

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OMB No. 2040-0042 Approval Expires 11/30/2014

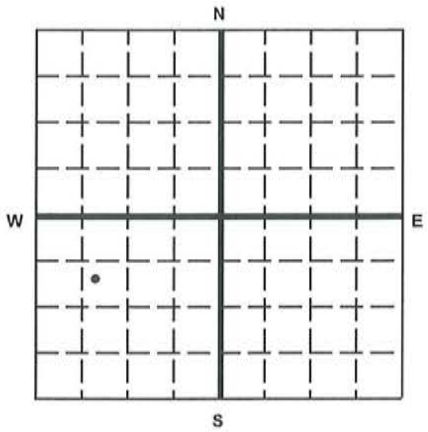
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 960 ft. frm (N/S) N Line of quarter section and 810 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 456S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	820	5
5.6est	13.70-EST.	0	35	6.75

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	825						
Sacks of Cement To Be Used (each plug)	31.4						
Slurry Volume To Be Pumped (cu. ft.)	40.3						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
825	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Dan Johnson, VP Environment and Technical Services		09/07/2012

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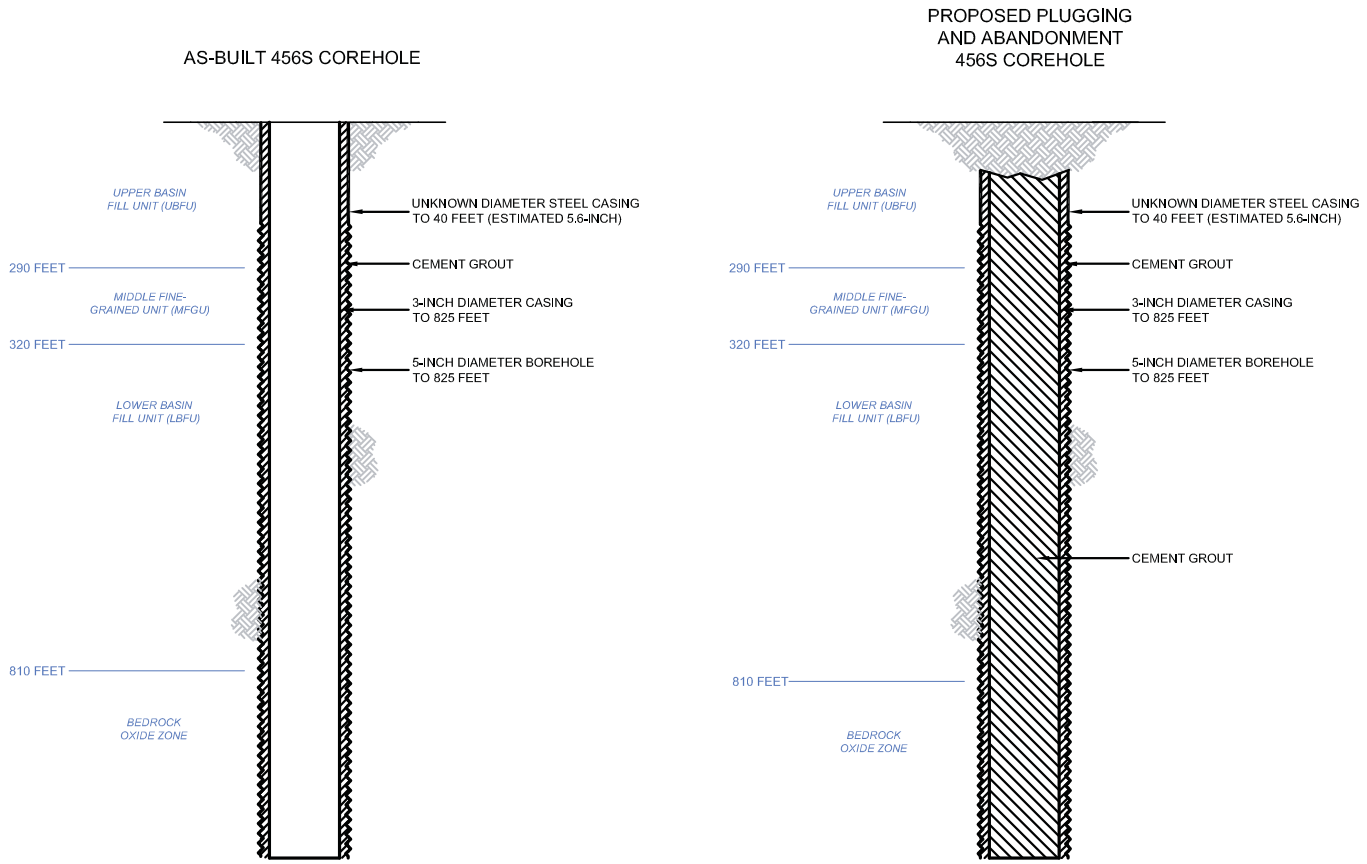


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

456S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON456S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

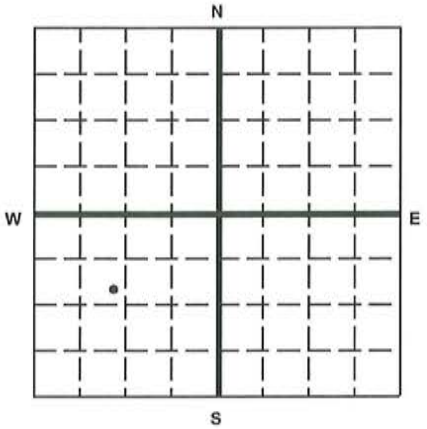
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SE 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1170 ft. frm (N/S) N Line of quarter section and 1190 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 459S

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
5.6est	13.70-EST	0	35	6.5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5						
Depth to Bottom of Tubing or Drill Pipe (ft	NA						
Sacks of Cement To Be Used (each plug)	50.8						
Slurry Volume To Be Pumped (cu. ft.)	65.2						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
483	5		

Estimated Cost to Plug Wells

$13,715

Certification

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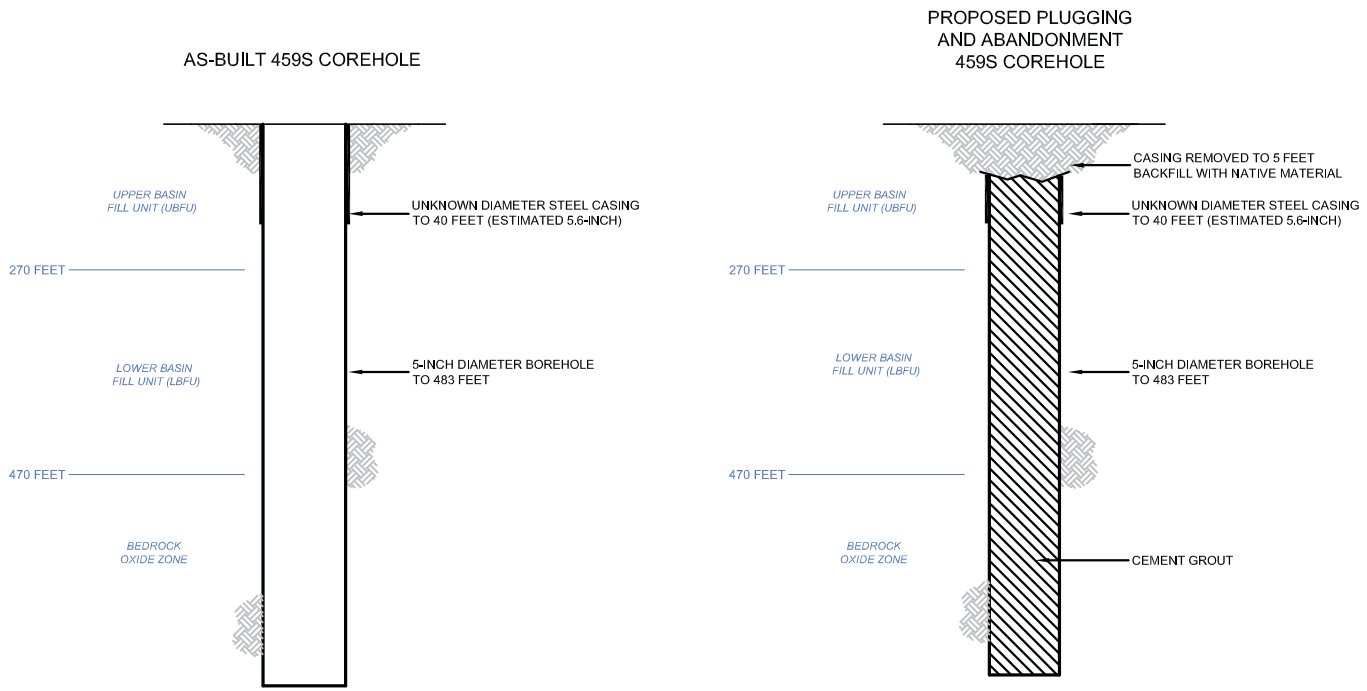

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HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

459S COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
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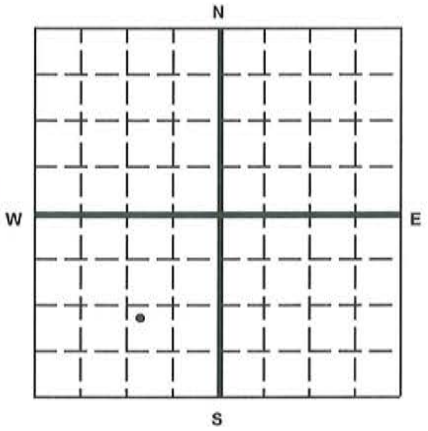

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of NW 1/4 of SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1190 ft. frm (N/S) S Line of quarter section and 1080 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 460MF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST	0	469	5
6	13.70	0	45	7.88

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	474						
Sacks of Cement To Be Used (each plug)	18						
Slurry Volume To Be Pumped (cu. ft.)	23.02						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
474	5		

Estimated Cost to Plug Wells

$13,715

Certification

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Dan Johnson, VP Environment and Technical Services		09/07/2012

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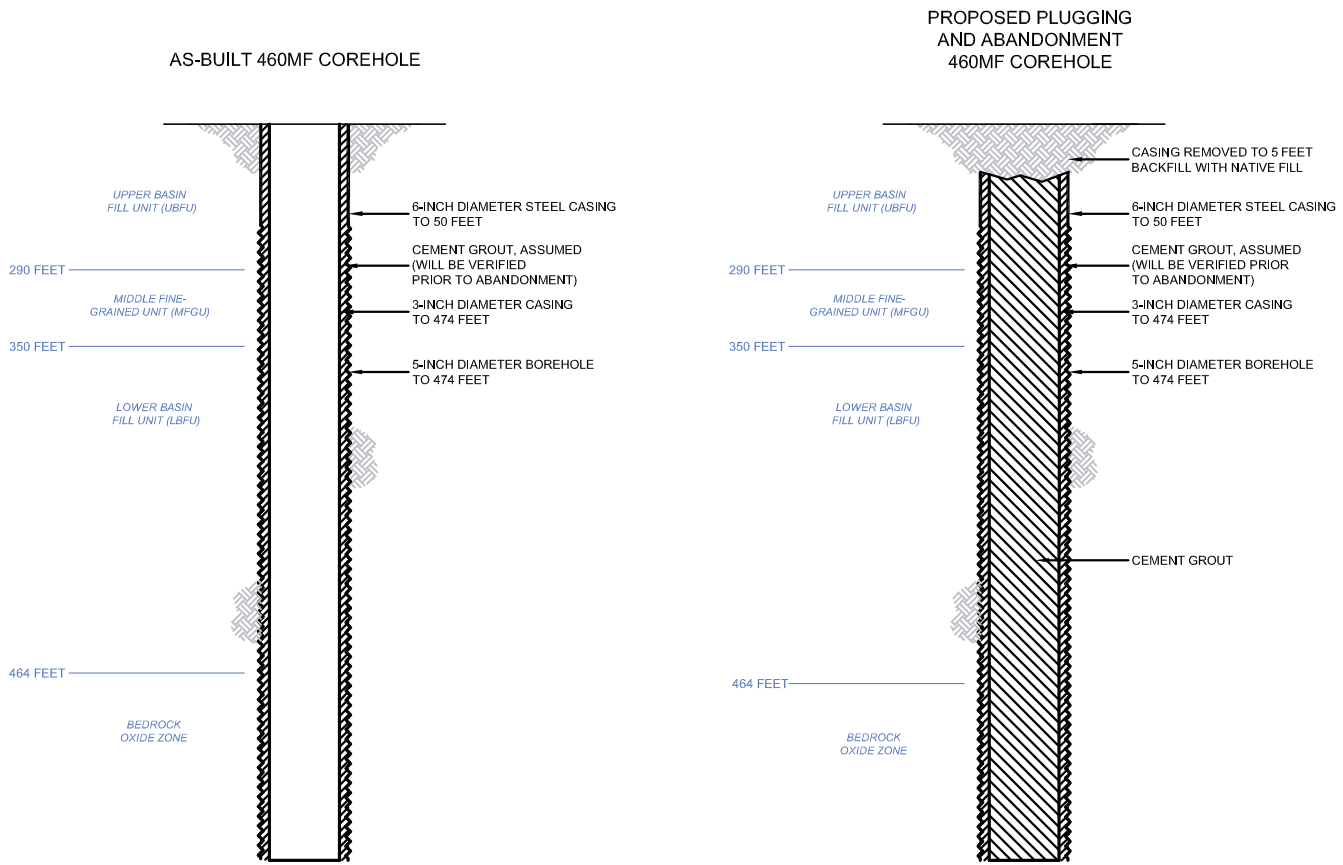


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

460MF COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON460MF_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

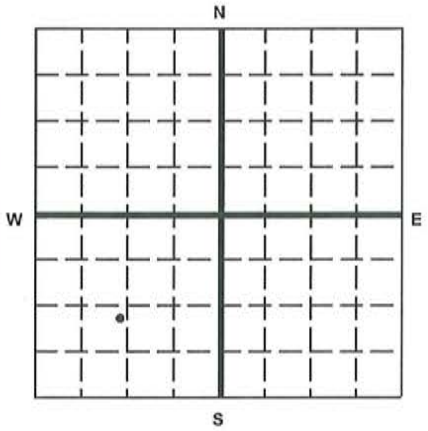
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of NE 1/4 of SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1180 ft. frm (N/S) S Line of quarter section and 1260 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 461MF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
6	13.70-EST	0	50	7.88
3	9.11-EST.	0	380	5

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	385						
Sacks of Cement To Be Used (each plug)	14.5						
Slurry Volume To Be Pumped (cu. ft.)	18.7						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
385	5		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

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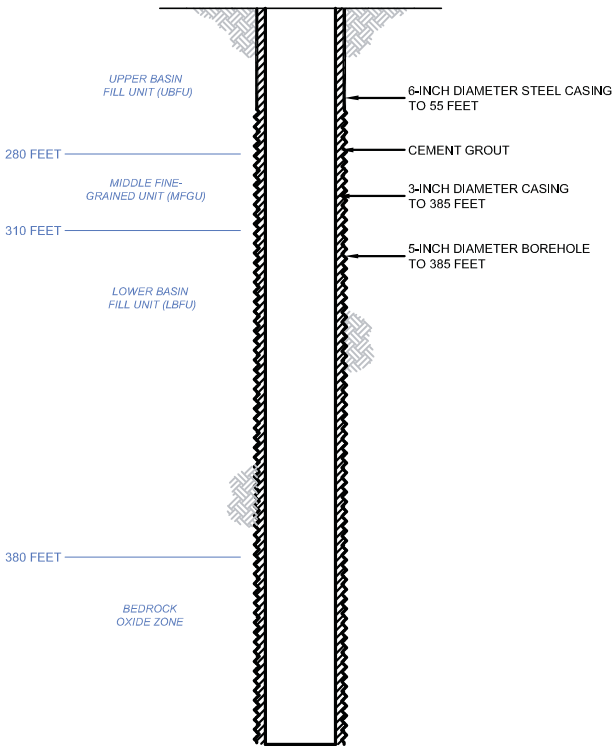

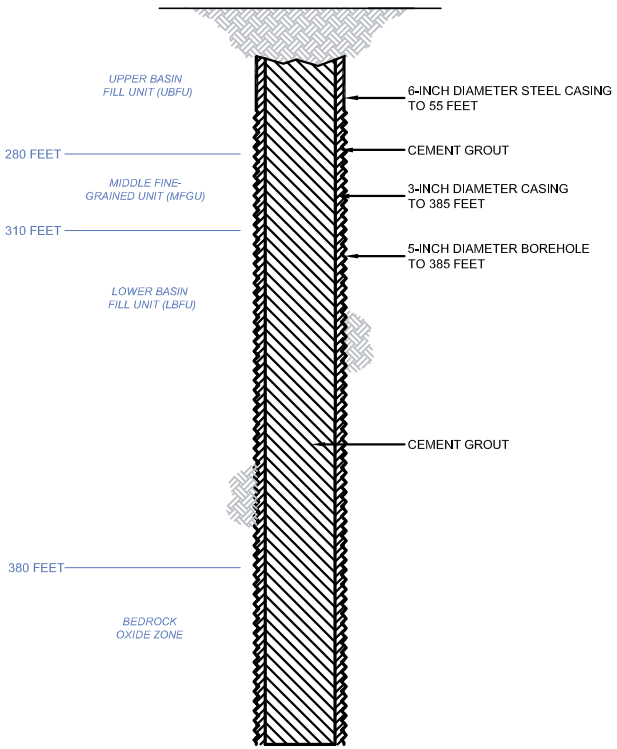

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

461MF COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON461MF_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

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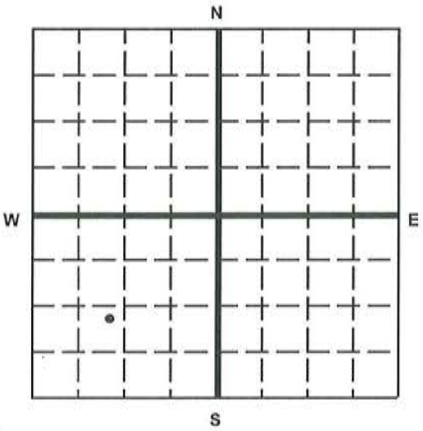

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of NE 1/4 of SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1190 ft. frm (N/S) S Line of quarter section and 1060 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 462MF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	489	5
6	13.70-EST.	0	60	7.88

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	494						
Sacks of Cement To Be Used (each plug)	18.7						
Slurry Volume To Be Pumped (cu. ft.)	24						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
494	5		

Estimated Cost to Plug Wells

$13,715

Certification

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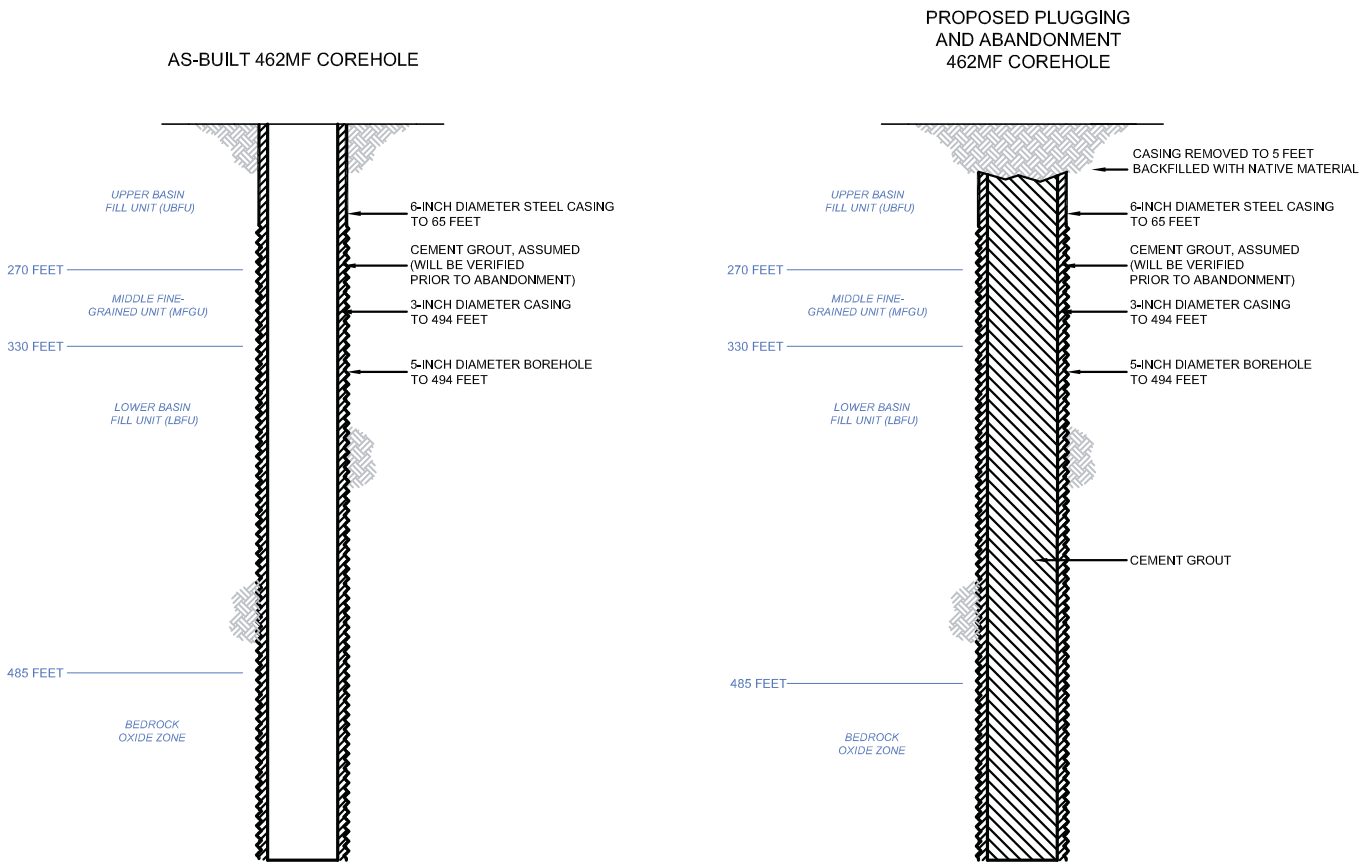

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

462MF COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\462MF_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
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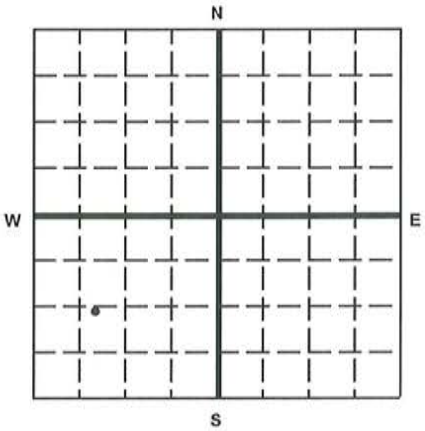
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of NE 1/4 of SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1290 ft. frm (N/S) S Line of quarter section and 850 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 463MF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
3	9.11-EST.	0	715	5
6	13.70-EST.	0	45	7.88

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3						
Depth to Bottom of Tubing or Drill Pipe (ft	720						
Sacks of Cement To Be Used (each plug)	27.4						
Slurry Volume To Be Pumped (cu. ft.)	35.10						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
720	5		

Estimated Cost to Plug Wells

$13,715

Certification

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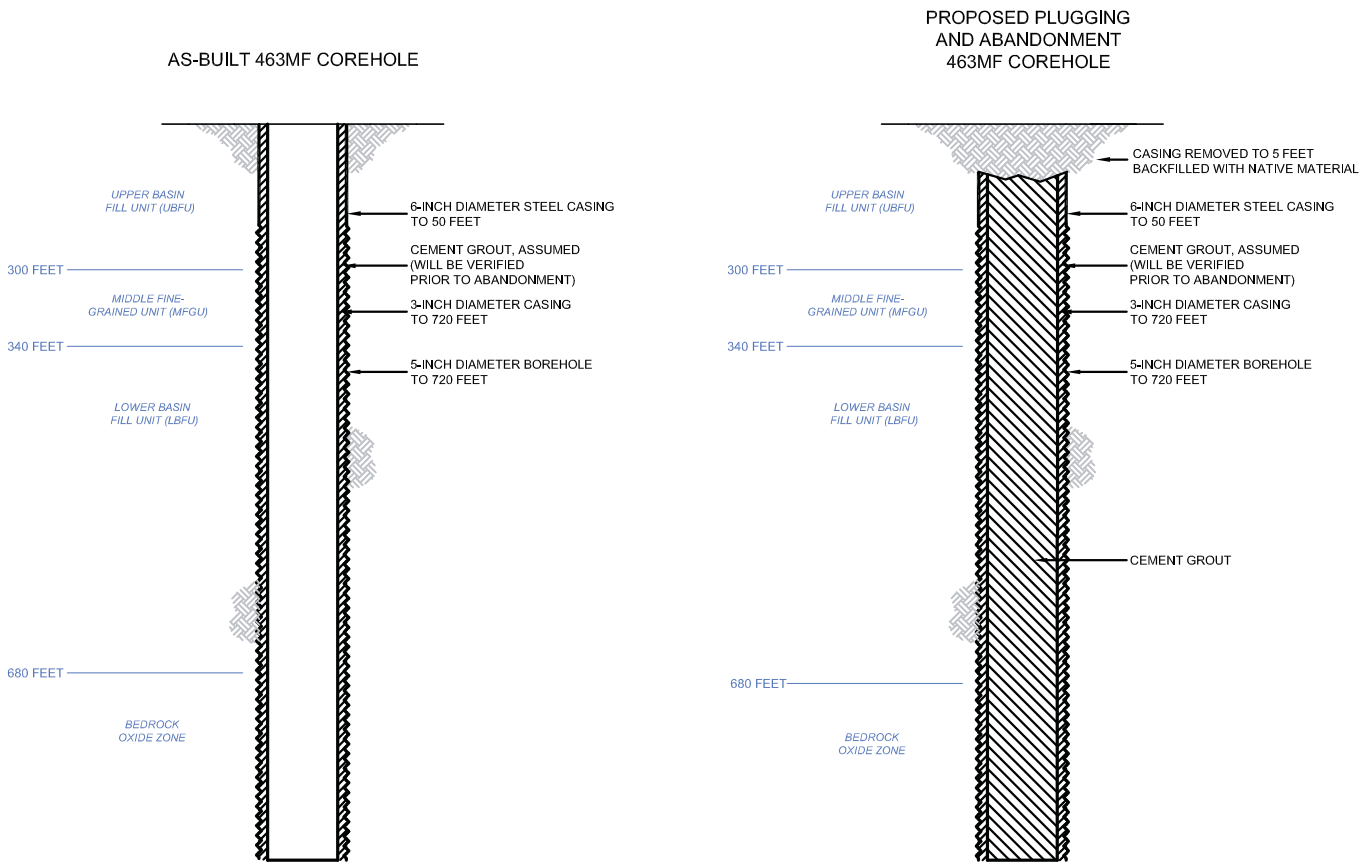

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

463MF COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\463MF_ABANDON.DWG

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EPA

United States Environmental Protection Agency
Washington, DC 20460

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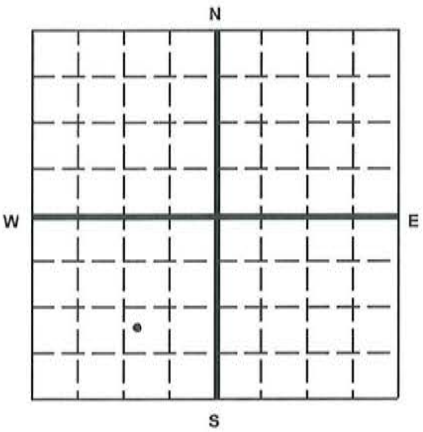

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of NW 1/4 of SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1010 ft. frm (N/S) S Line of quarter section and 1190 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number 465MF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
NA	NA	NA	NA	NA

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5-EST						
Depth to Bottom of Tubing or Drill Pipe (ft	NA						
Sacks of Cement To Be Used (each plug)	36.7						
Slurry Volume To Be Pumped (cu. ft.)	47						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
350	5		

Estimated Cost to Plug Wells

$13,715

Certification

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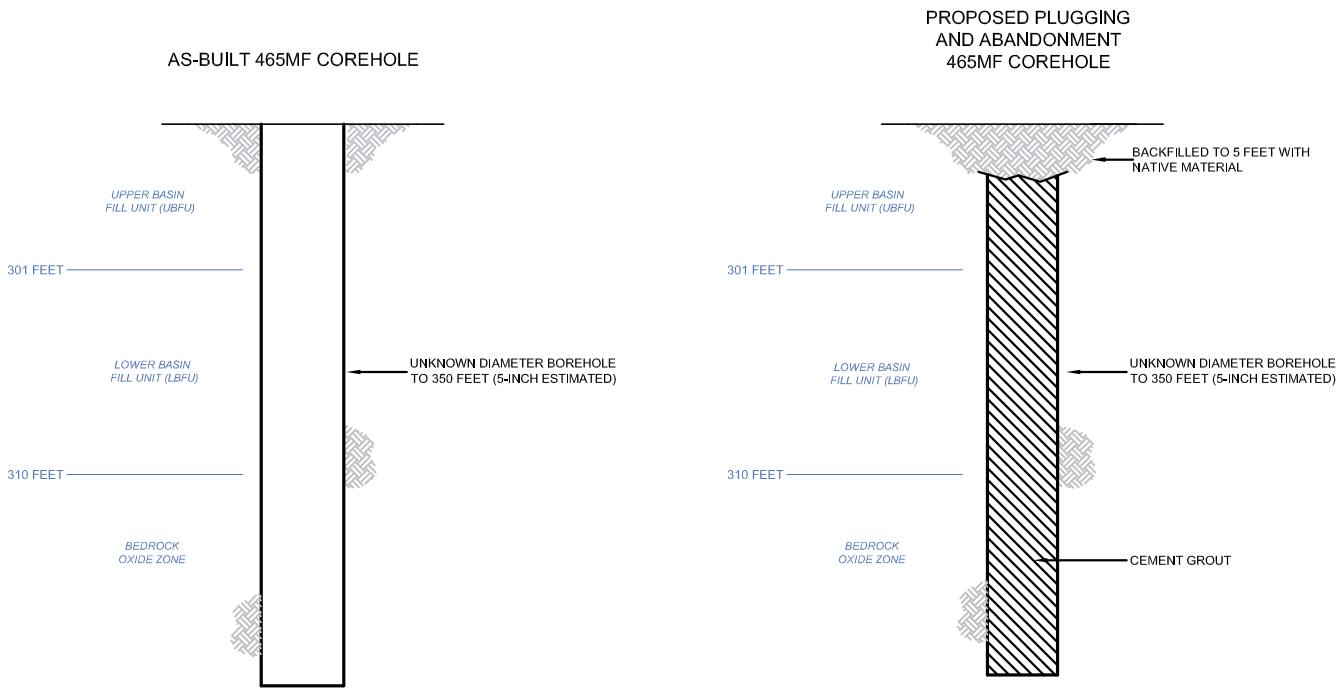

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

465MF COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\465MF_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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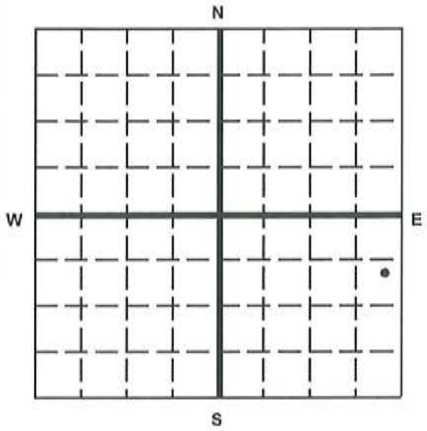

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of SE 1/4 of NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 720 ft. frm (N/S) N Line of quarter section and 310 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number M32-UBF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
5.6	15-EST.	0	165	6

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.6						
Depth to Bottom of Tubing or Drill Pipe (ft	180						
Sacks of Cement To Be Used (each plug)	22.0						
Slurry Volume To Be Pumped (cu. ft.)	28.2						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
170	129-PERFORATED		
129	5-BLANK		

Estimated Cost to Plug Wells

$13,715

Certification

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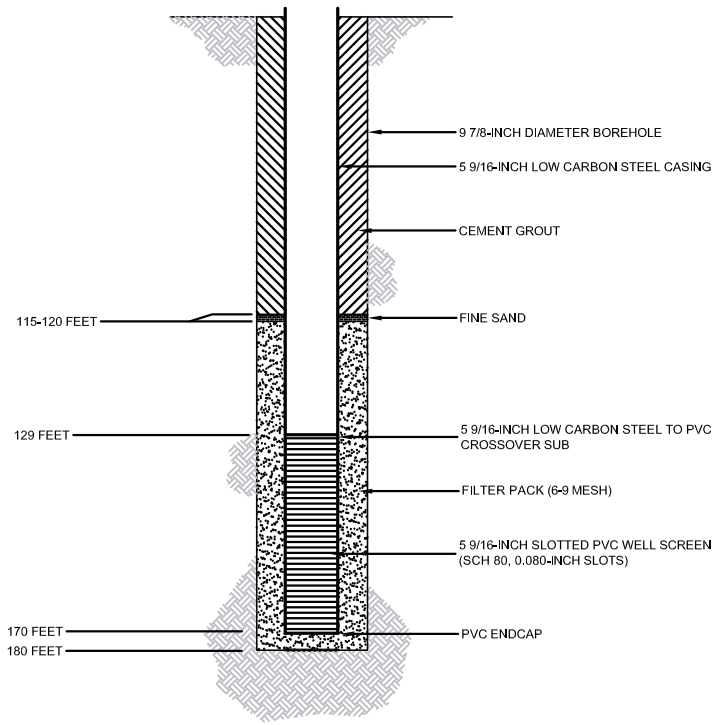
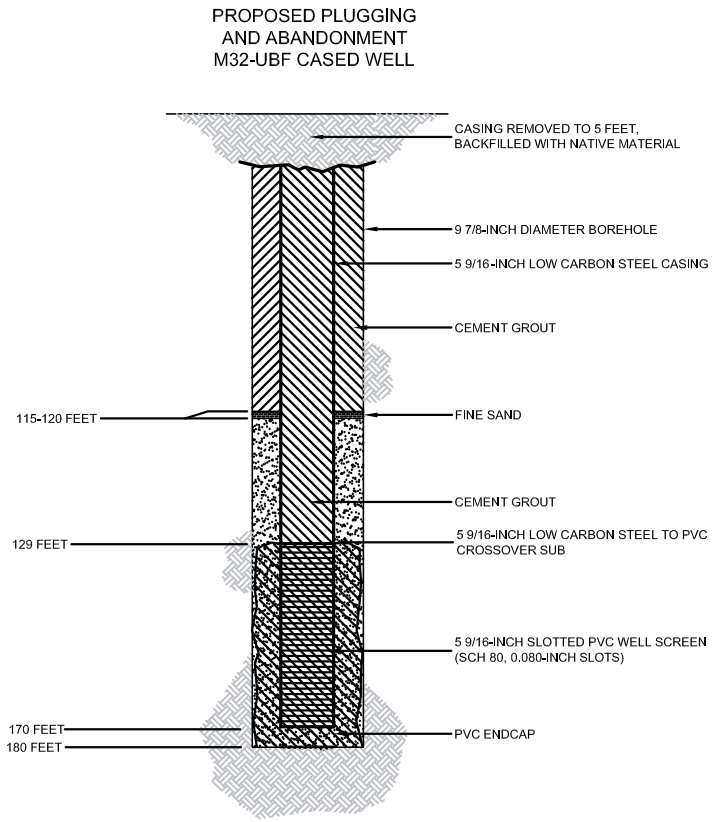




HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

M32-UBF CASED WELL DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLA\BANDONM\32-UBF_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

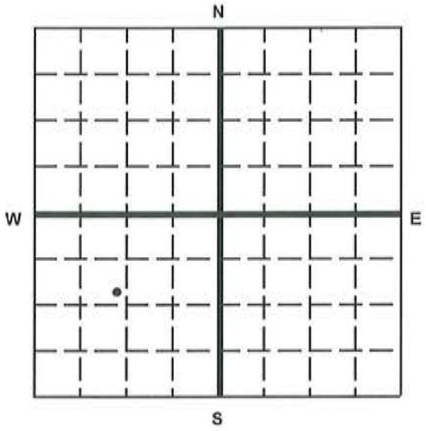
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

SE 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1180 ft. frm (N/S) N Line of quarter section and 1170 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number MCC544

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
4	10.79-EST.	0	375	5 EST

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	3.88	4					
Depth to Bottom of Tubing or Drill Pipe (ft	NA	380					
Sacks of Cement To Be Used (each plug)	60.2	25.5					
Slurry Volume To Be Pumped (cu. ft.)	77.22	32.72					
Calculated Top of Plug (ft.)	380	5					
Measured Top of Plug (if tagged ft.)	380	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
1320.5	380		
380	5		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

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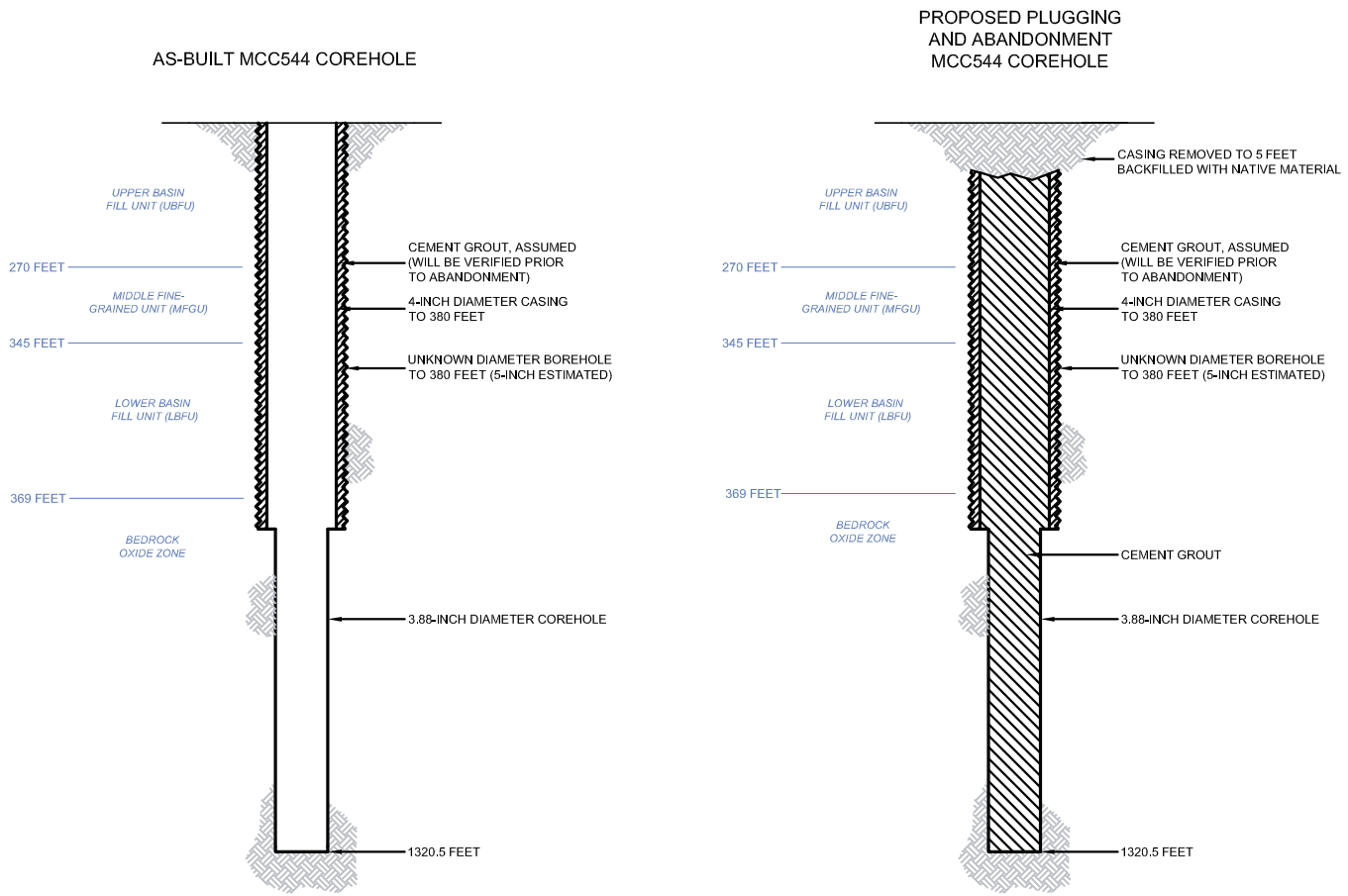


HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

MCC544 COREHOLE DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDONM\CC544_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

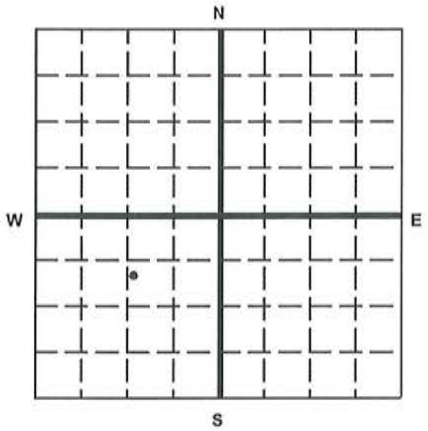
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 940 ft. frm (N/S) N Line of quarter section and 1280 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number OB3-1

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
4	2.78-EST.	0	795	UNK
12	41.45-EST.	0	15	UNK

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	4						
Depth to Bottom of Tubing or Drill Pipe (ft	800						
Sacks of Cement To Be Used (each plug)	54.1						
Slurry Volume To Be Pumped (cu. ft.)	69.4						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
800	780-BLANK		
780	500-PERFORATED		
500	5-BLANK		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

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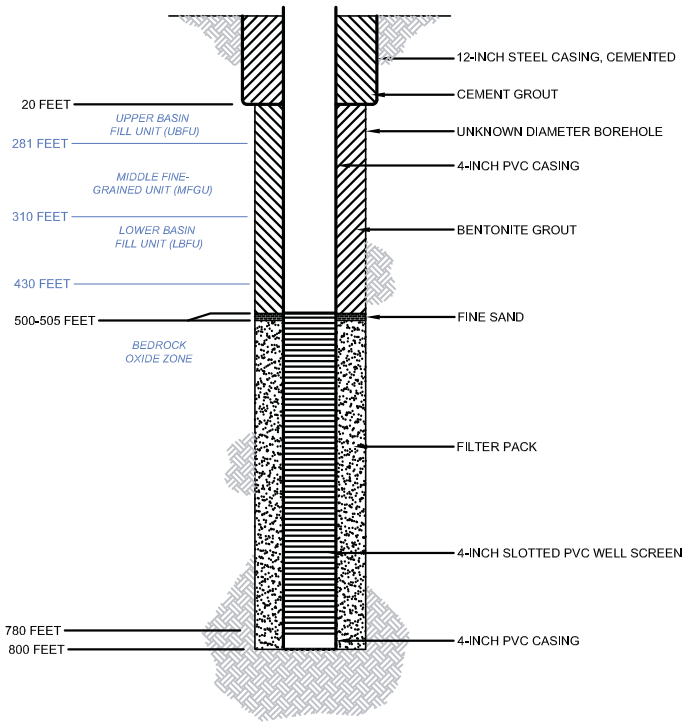
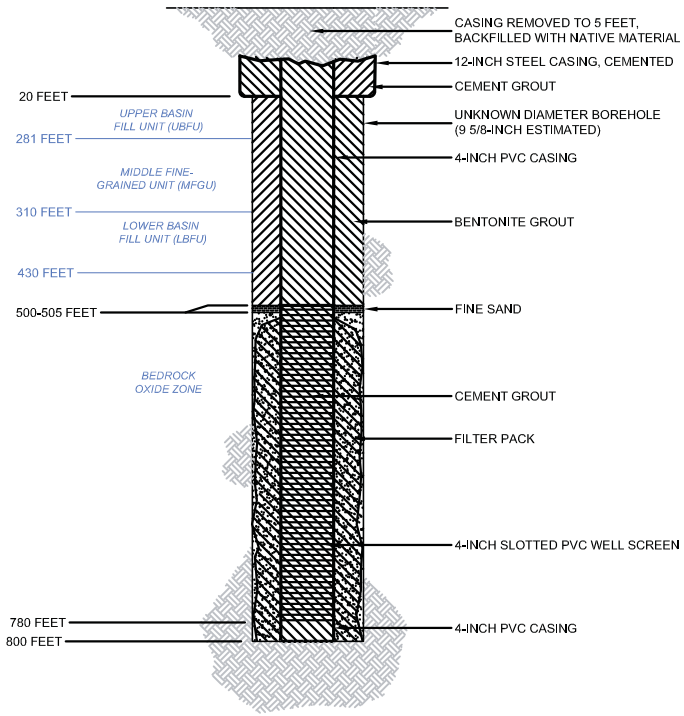
AS-BUILT
OB3-1 CASED WELL



PROPOSED PLUGGING
AND ABANDONMENT
OB3-1 CASED WELL



HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

OB3-1 CASED WELL DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\OB3-1_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

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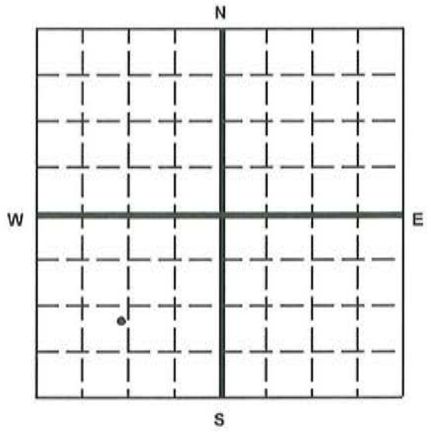

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of NE 1/4 of SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1070 ft. frm (N/S) S Line of quarter section and 1260 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number OB4-1

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
4	2.78-EST.	0	795	UNK
12	41.45-EST.	0	15	UNK

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	4						
Depth to Bottom of Tubing or Drill Pipe (ft	800						
Sacks of Cement To Be Used (each plug)	54.1						
Slurry Volume To Be Pumped (cu. ft.)	69.4						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
800	780-BLANK		
780	440-PERFORATED		
440	5-BLANK		

Estimated Cost to Plug Wells

$13,715

Certification

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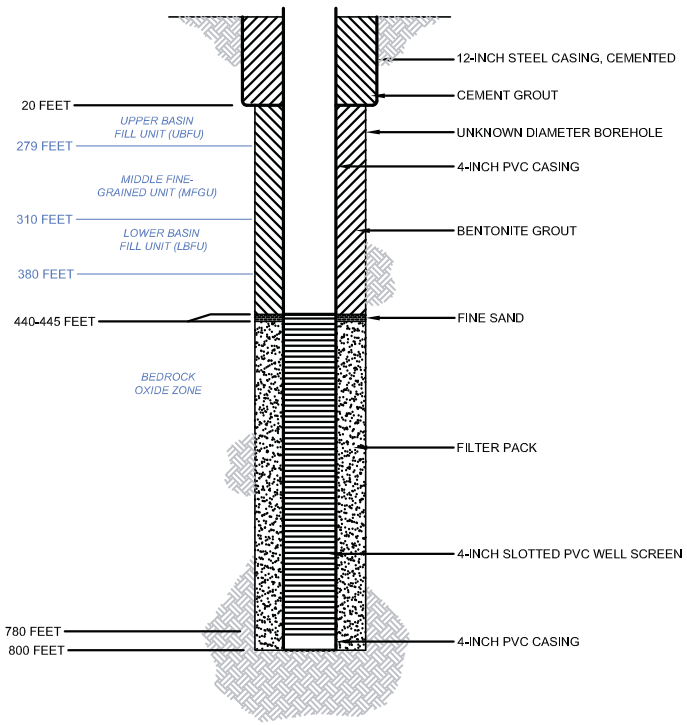
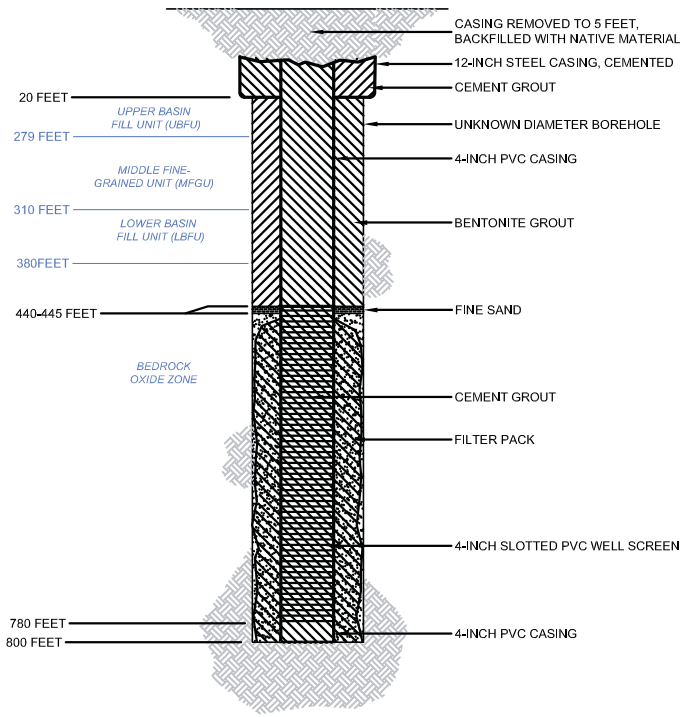
AS-BUILT
OB4-1 CASED WELL



PROPOSED PLUGGING
AND ABANDONMENT
OB4-1 CASED WELL



HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

OB4-1 CASED WELL DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\OB4-1_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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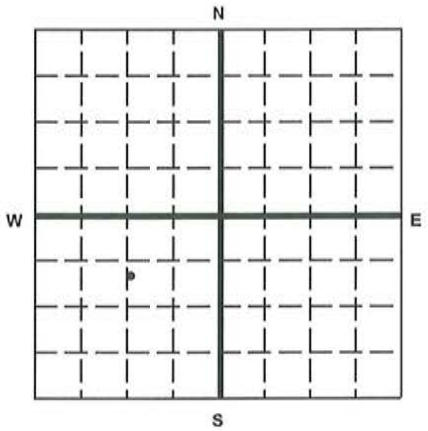

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 870 ft. frm (N/S) N Line of quarter section and 1290 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number PW3-1

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
6	5.31-EST.	0	795	UNK
12	41.47-EST.	0	15	UNK

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	6						
Depth to Bottom of Tubing or Drill Pipe (ft	800						
Sacks of Cement To Be Used (each plug)	121.8						
Slurry Volume To Be Pumped (cu. ft.)	156.1						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
800	780-BLANK		
780	500-PERFORATED		
500	5-BLANK		

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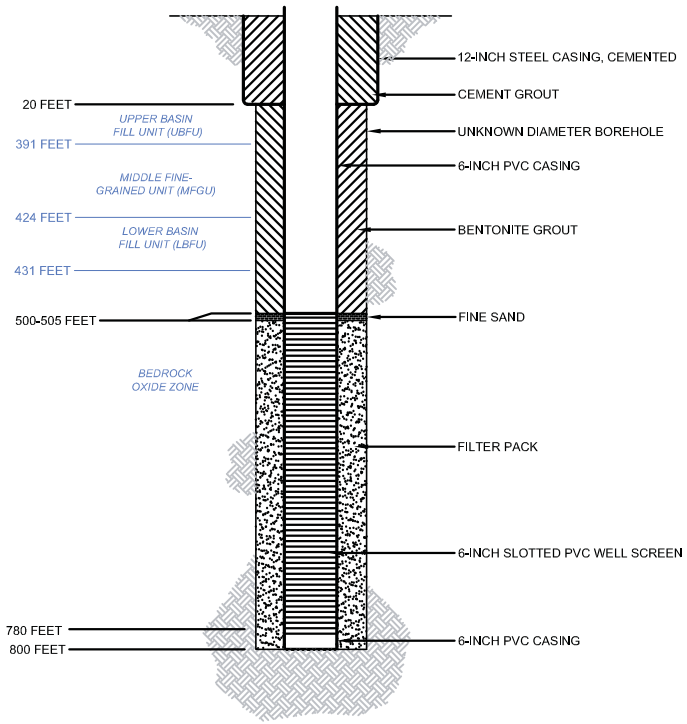

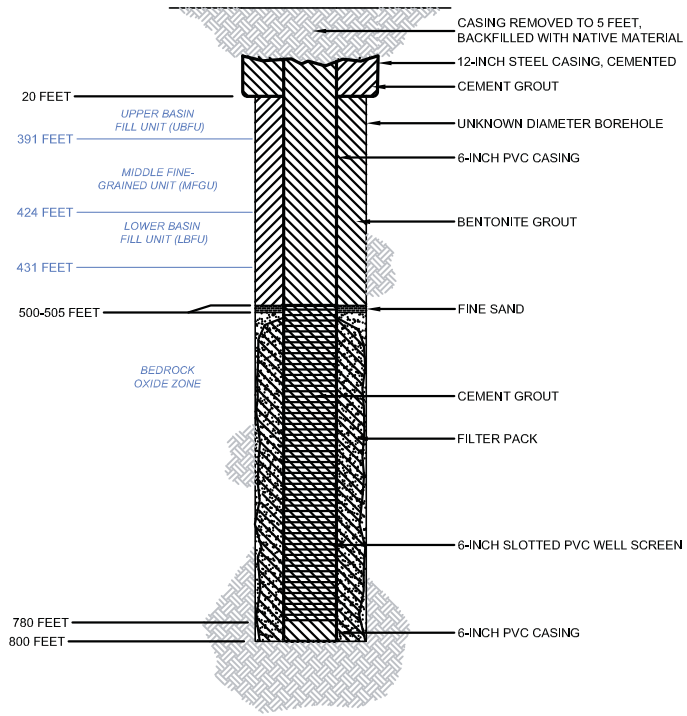

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

PW3-1 CASED WELL DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\PW3-1_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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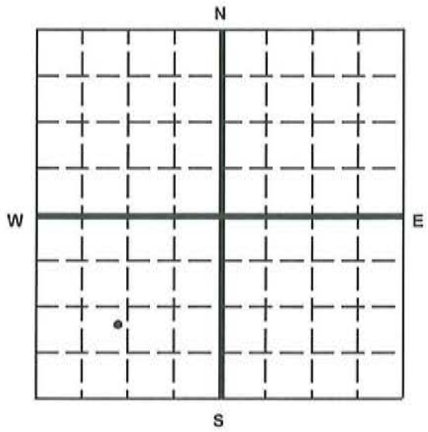

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NE 1/4 of NE 1/4 of SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1020 ft. frm (N/S) S Line of quarter section and 1250 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number PW4-1

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
6	5.31-EST.	0	795	UNK
12	41.47-EST.	0	15	UNK

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	6						
Depth to Bottom of Tubing or Drill Pipe (ft	800						
Sacks of Cement To Be Used (each plug)	121.8						
Slurry Volume To Be Pumped (cu. ft.)	156.1						
Calculated Top of Plug (ft.)	5						
Measured Top of Plug (if tagged ft.)	5						
Slurry Wt. (Lb./Gal.)	15.6						
Type Cement or Other Material (Class III)	V						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
800	780-BLANK		
780	440-PERFORATED		
440	5-BLANK		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

Paperwork Reduction Act Notice

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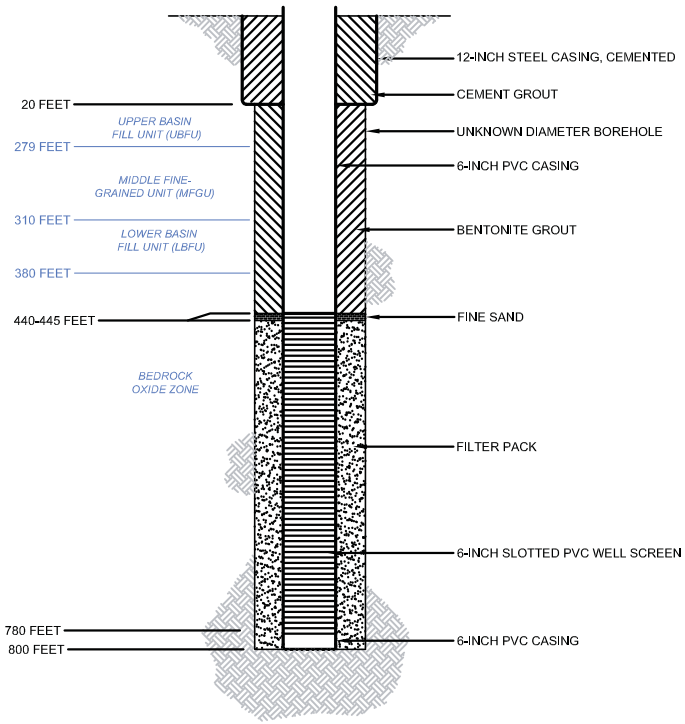
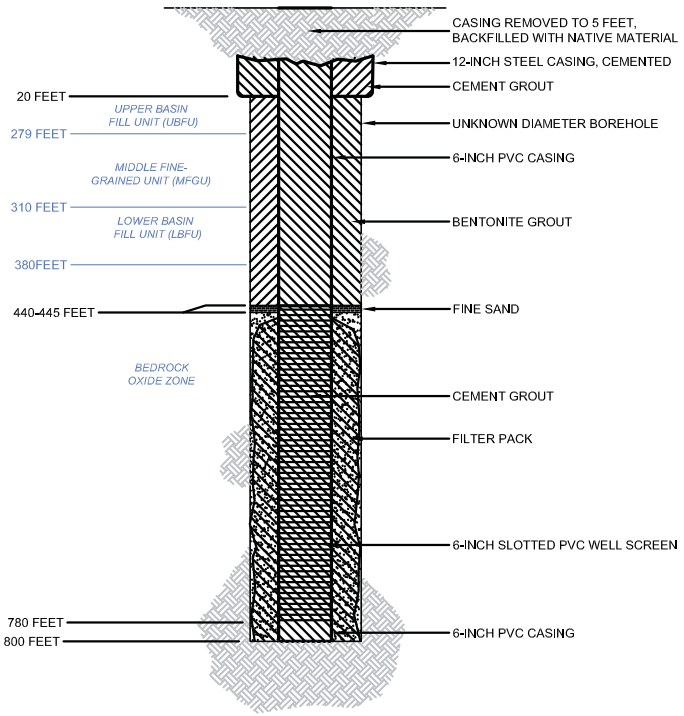
AS-BUILT
PW4-1 CASED WELL



PROPOSED PLUGGING
AND ABANDONMENT
PW4-1 CASED WELL



HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

PW4-1 CASED WELL DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLA\BANDON\PW4-1_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 11/30/2014

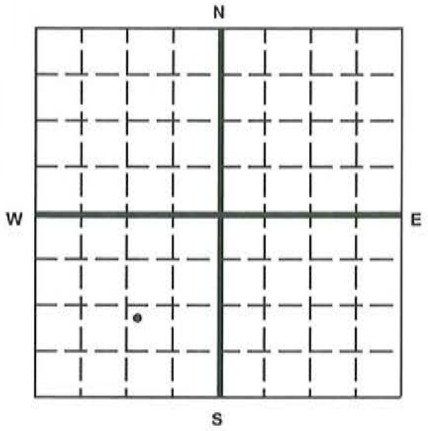
EPA

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator
Florence Copper Project 1575 W Hunt Hwy, Florence Arizona 85132	Curis Resources (Arizona) Inc 1575 W Hunt Hwy, Florence, Arizona 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description

NW 1/4 of NW 1/4 of SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1170 ft. frm (N/S) S Line of quarter section and 1190 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION

- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY

- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number WW3

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14	45-EST.	0	933	UNK
18	70-EST.	0	928	UNK
24	80-EST.	0	76	UNK

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	14	18					
Depth to Bottom of Tubing or Drill Pipe (ft	933	496					
Sacks of Cement To Be Used (each plug)	364.4	677.9					
Slurry Volume To Be Pumped (cu. ft.)	467.2	869.1					
Calculated Top of Plug (ft.)	496	5					
Measured Top of Plug (if tagged ft.)	496	5					
Slurry Wt. (Lb./Gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	V	V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
933	496-PERFORATED 14"		
496	240-PERFORATED 18"		
240	5-BLANK 18"		

Estimated Cost to Plug Wells

$13,715

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environment and Technical Services		09/07/2012

Paperwork Reduction Act Notice

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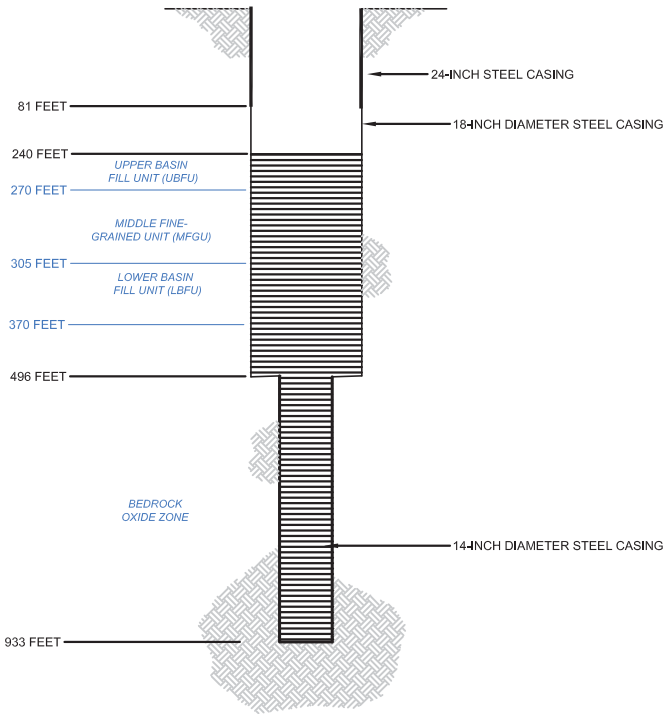
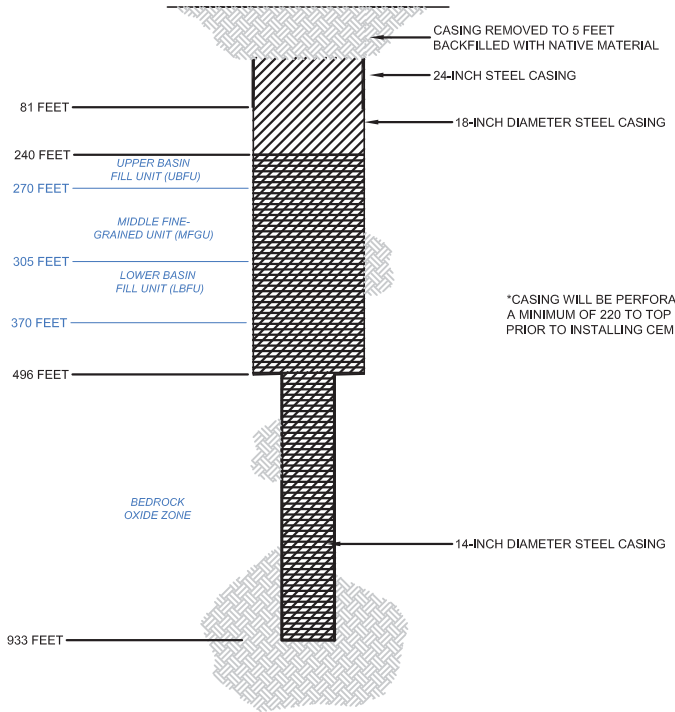
AS-BUILT
WW3 CASED WELL



PROPOSED PLUGGING
AND ABANDONMENT
WW3 CASED WELL



*CASING WILL BE PERFORATED FROM
A MINIMUM OF 220 TO TOP OF PERFORATIONS
PRIOR TO INSTALLING CEMENT PLUG.

HALEY & ALDRICH

CURIS RESOURCES (ARIZONA) INC.
FLORENCE, ARIZONA

WW3 CASED WELL DIAGRAM

HDI CURIS

SCALE: NOT TO SCALE
AUGUST 2012

FIGURE 1

G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\WW3_ABANDON.DWG

Exhibit Q-4

EPA Forms 7520-14, Plugging and Abandonment Plans for Class III Wells

BHP WELLS

OMB No. 2040-0042 Approval Expires 11/30/2014

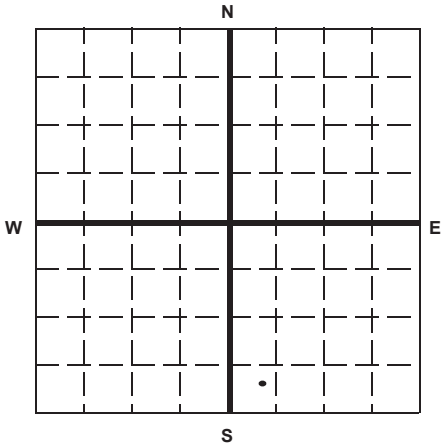
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 390 ft. frm (N/S) S Line of quarter section
and 435 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-1

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"		20	20	unknown
8"		403	403	12.75
1.5"		360	360	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.875	8					
Depth to Bottom of Tubing or Drill Pipe (ft	740	403					
Sacks of Cement To Be Used (each plug)	50	110					
Slurry Volume To Be Pumped (cu. ft.)	63	141					
Calculated Top of Plug (ft.)	403	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
403	740		

Estimated Cost to Plug Wells
$8,800

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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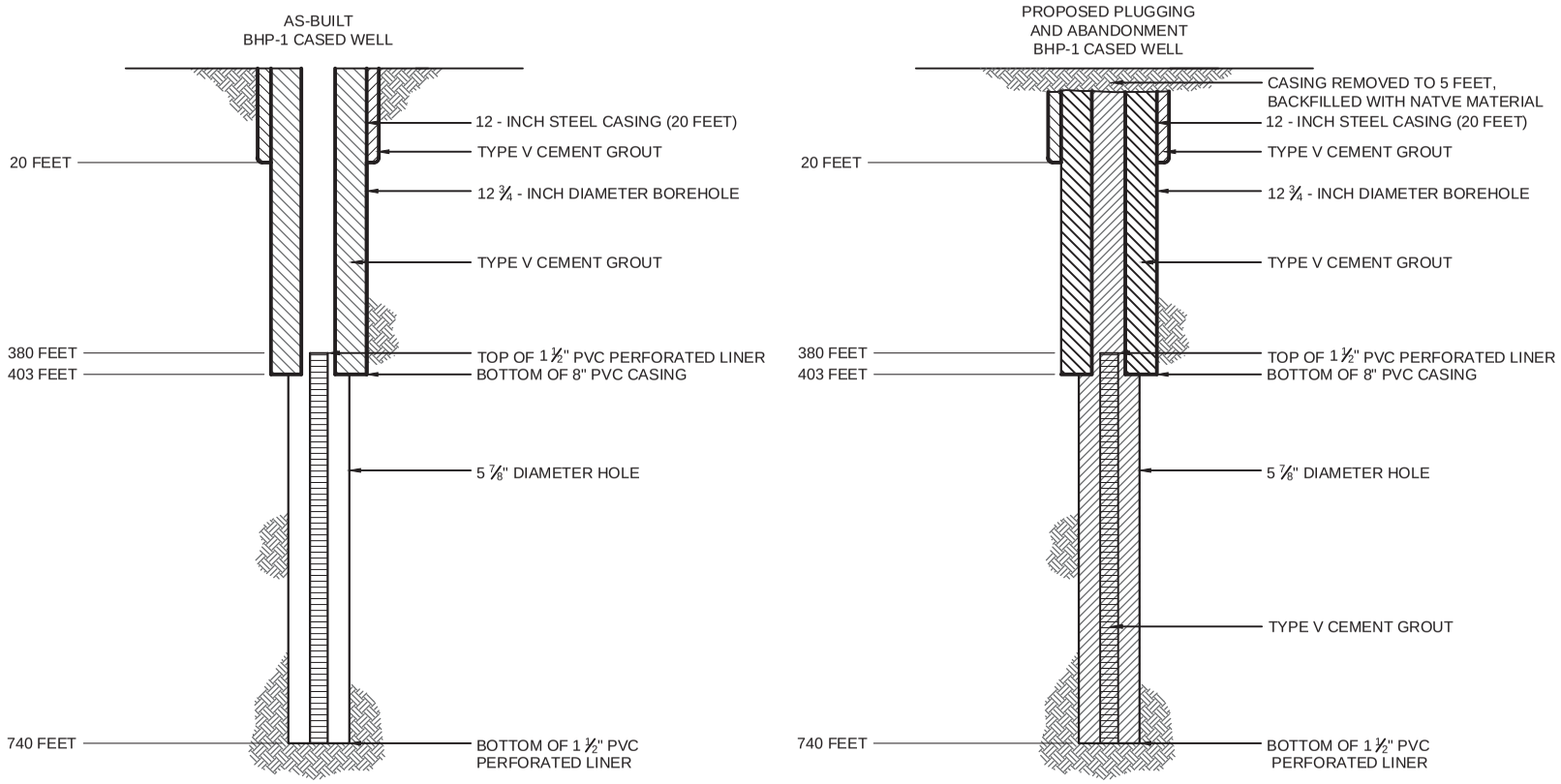
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-1.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-1 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

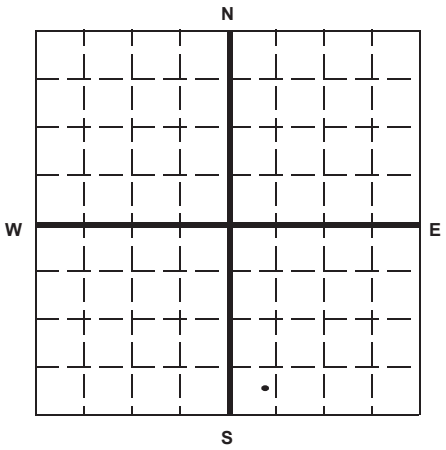
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 335 ft. frm (N/S) S Line of quarter section
and 485 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-2

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"		20	20	unknown
8"		408	408	12
4"		480	480	5.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.875	7.75	8				
Depth to Bottom of Tubing or Drill Pipe (ft	770	496	408				
Sacks of Cement To Be Used (each plug)	40	23	112				
Slurry Volume To Be Pumped (cu. ft.)	52	29	142				
Calculated Top of Plug (ft.)	496	408	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	Type V	Type V	Type V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
496	770		

Estimated Cost to Plug Wells
$8,800

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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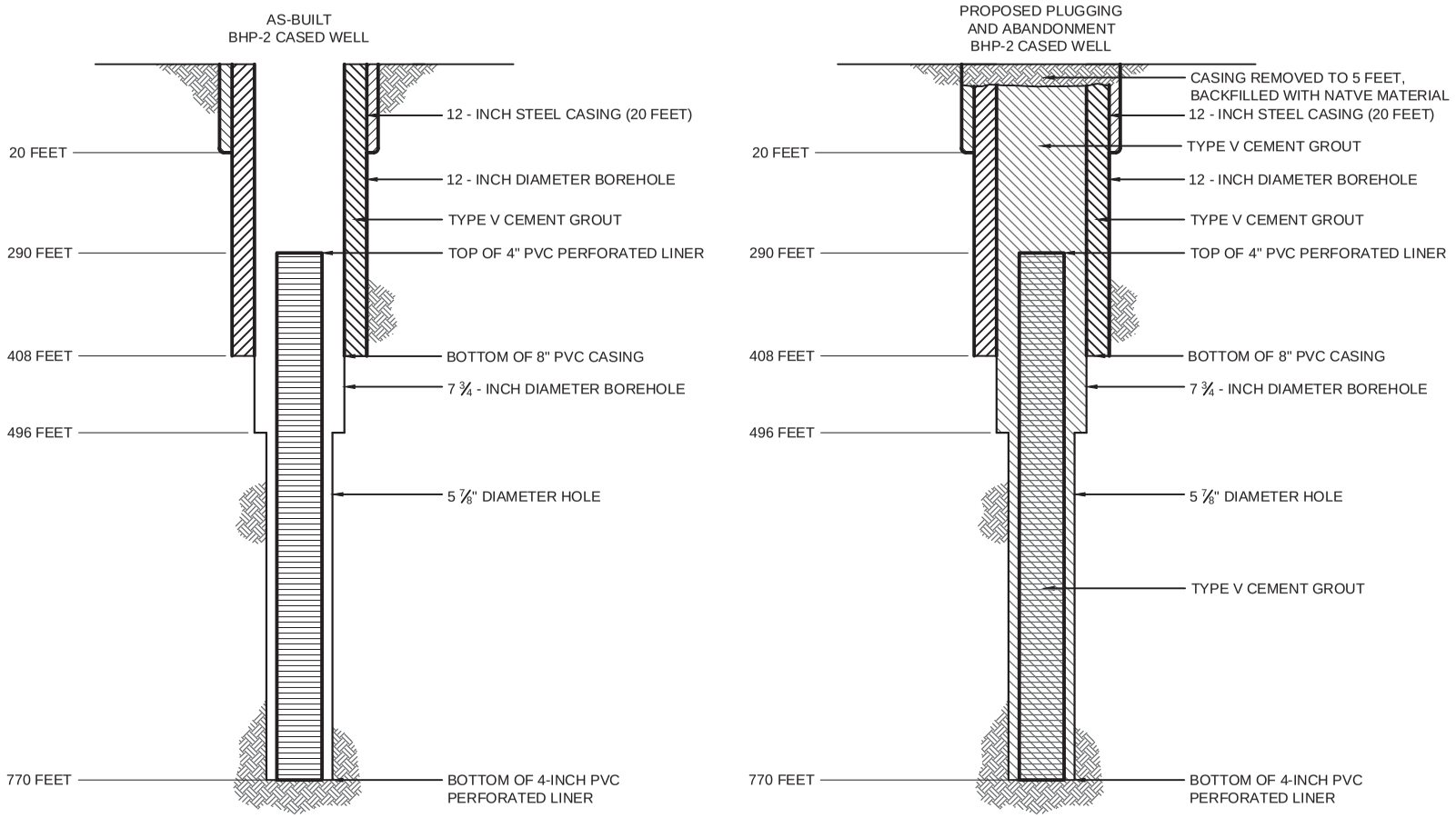
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-2.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-2 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

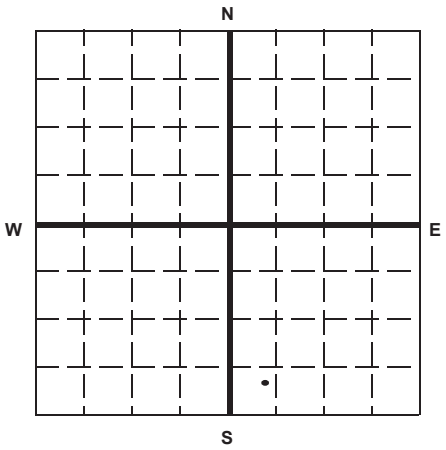
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 440 ft. frm (N/S) S Line of quarter section
and 485 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-3

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"		20	20	unknown
8"		403	403	12.25
1.5"		860	457	5.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.875	8					
Depth to Bottom of Tubing or Drill Pipe (ft	860	403					
Sacks of Cement To Be Used (each plug)	68	110					
Slurry Volume To Be Pumped (cu. ft.)	86	141					
Calculated Top of Plug (ft.)	403	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
403	860		

Estimated Cost to Plug Wells
$8,800

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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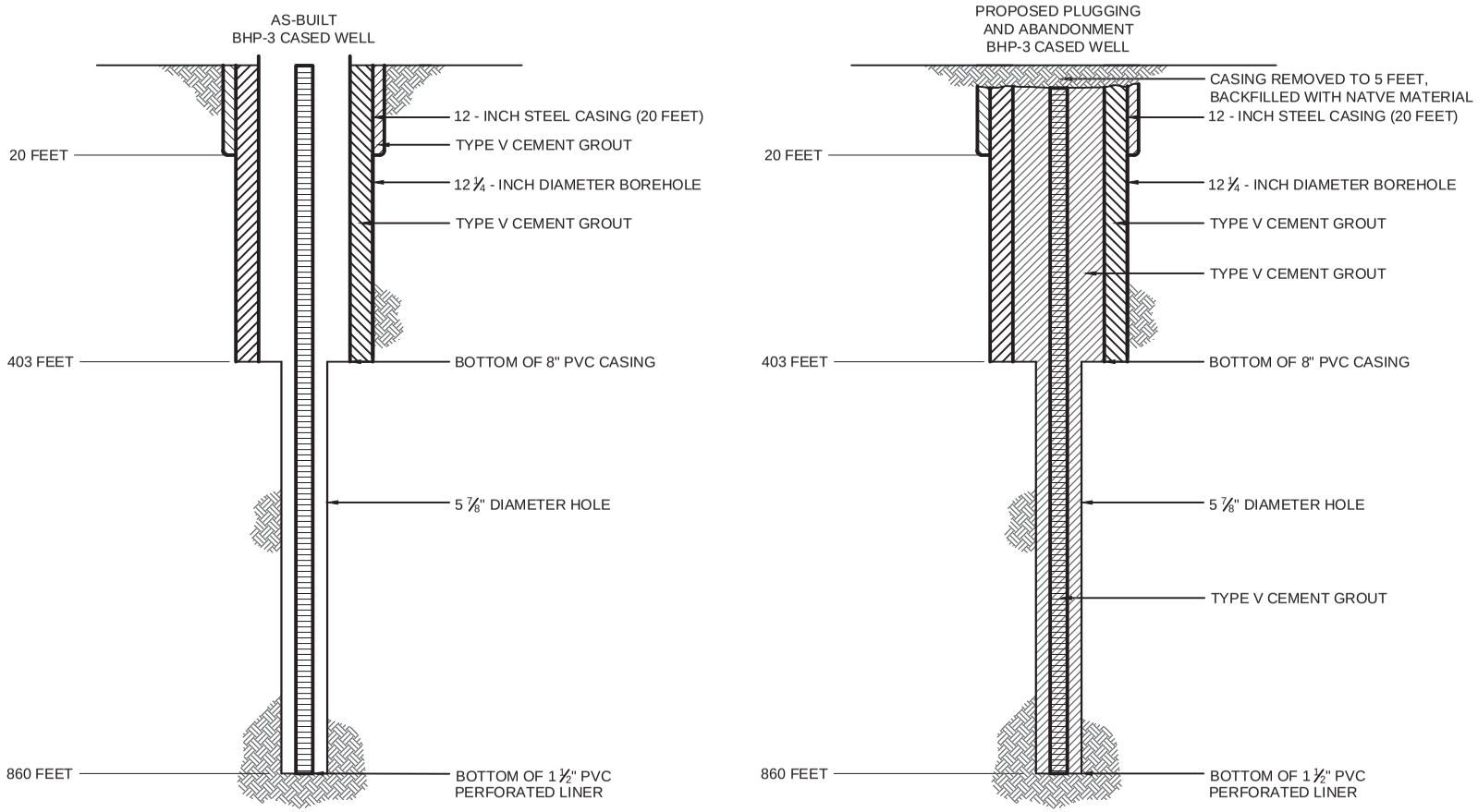
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-3.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-3 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

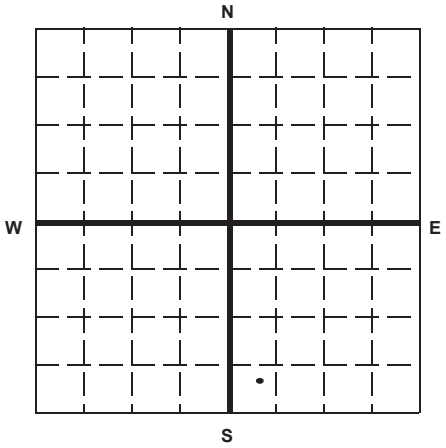
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 440 ft. frm (N/S) S Line of quarter section
and 385 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-4

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"		20	20	unknown
8"		403	403	12.25
4"		401	401	5.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.875	8					
Depth to Bottom of Tubing or Drill Pipe (ft	742	403					
Sacks of Cement To Be Used (each plug)	50	141					
Slurry Volume To Be Pumped (cu. ft.)	64	110					
Calculated Top of Plug (ft.)	339	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
403	742		

Estimated Cost to Plug Wells
$8,800

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

The public reporting and record keeping burden for this collection of information is estimated to average 4.5 hours for operators of Class I hazardous wells, 1.5 hours for operators of Class I non-hazardous wells, 3 hours for operators of Class II wells, and 1.5 hours for operators of Class III wells.
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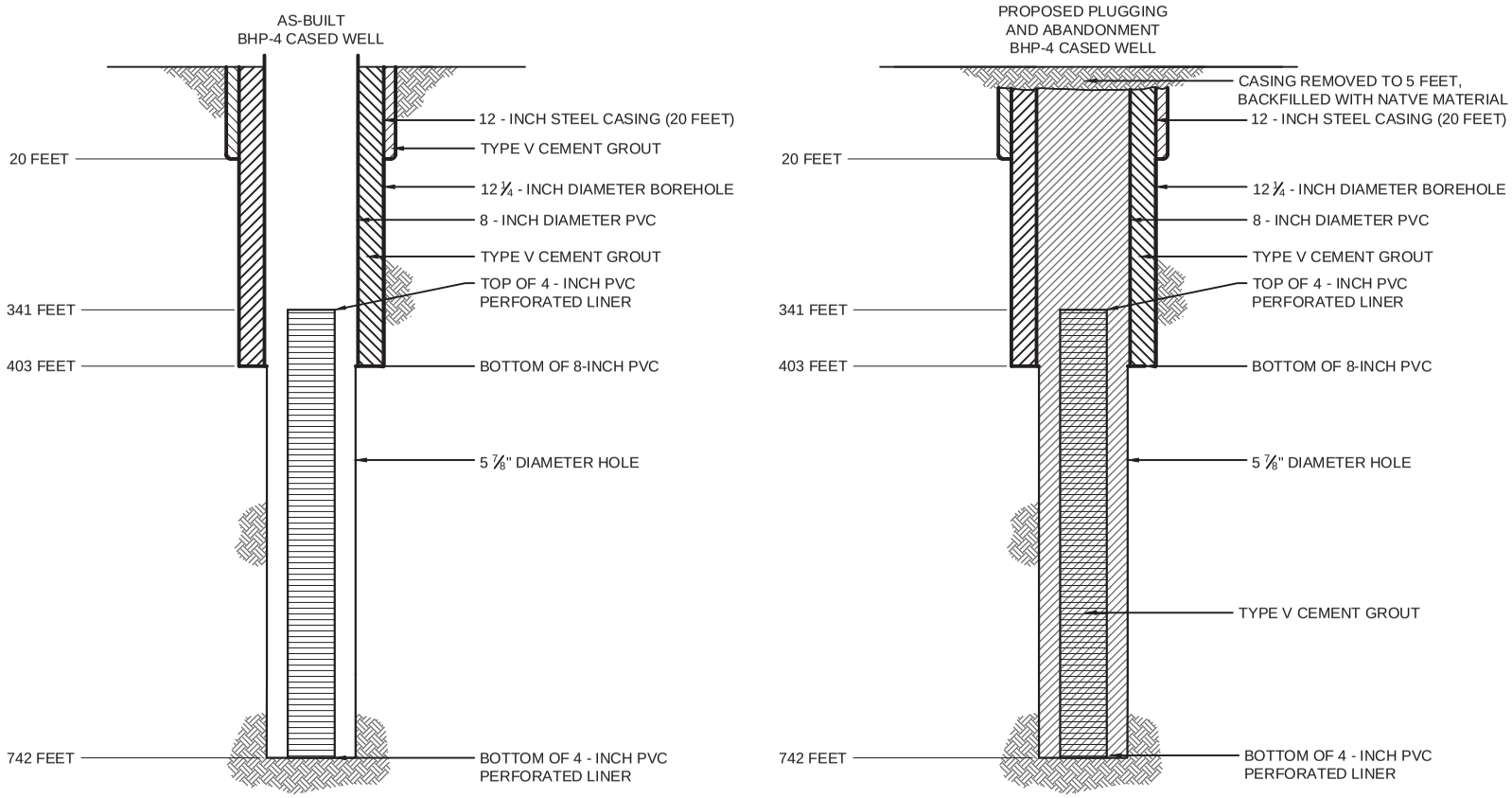
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-4.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-4 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

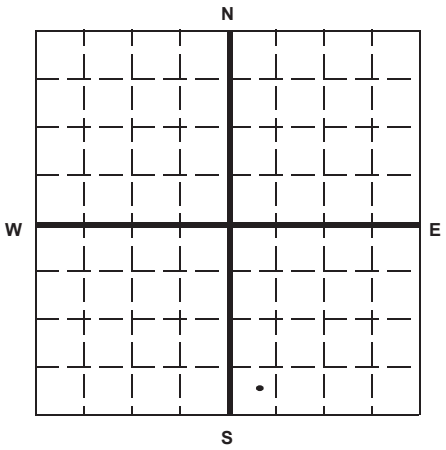
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 340 ft. frm (N/S) S Line of quarter section
and 385 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-5

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"		20	20	unknown
8"		403	403	12.25
4"		401	401	5.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.125	8					
Depth to Bottom of Tubing or Drill Pipe (ft	776	403					
Sacks of Cement To Be Used (each plug)	42	110					
Slurry Volume To Be Pumped (cu. ft.)	53	141					
Calculated Top of Plug (ft.)	403	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
403	776		

Estimated Cost to Plug Wells
$8,800

Certification

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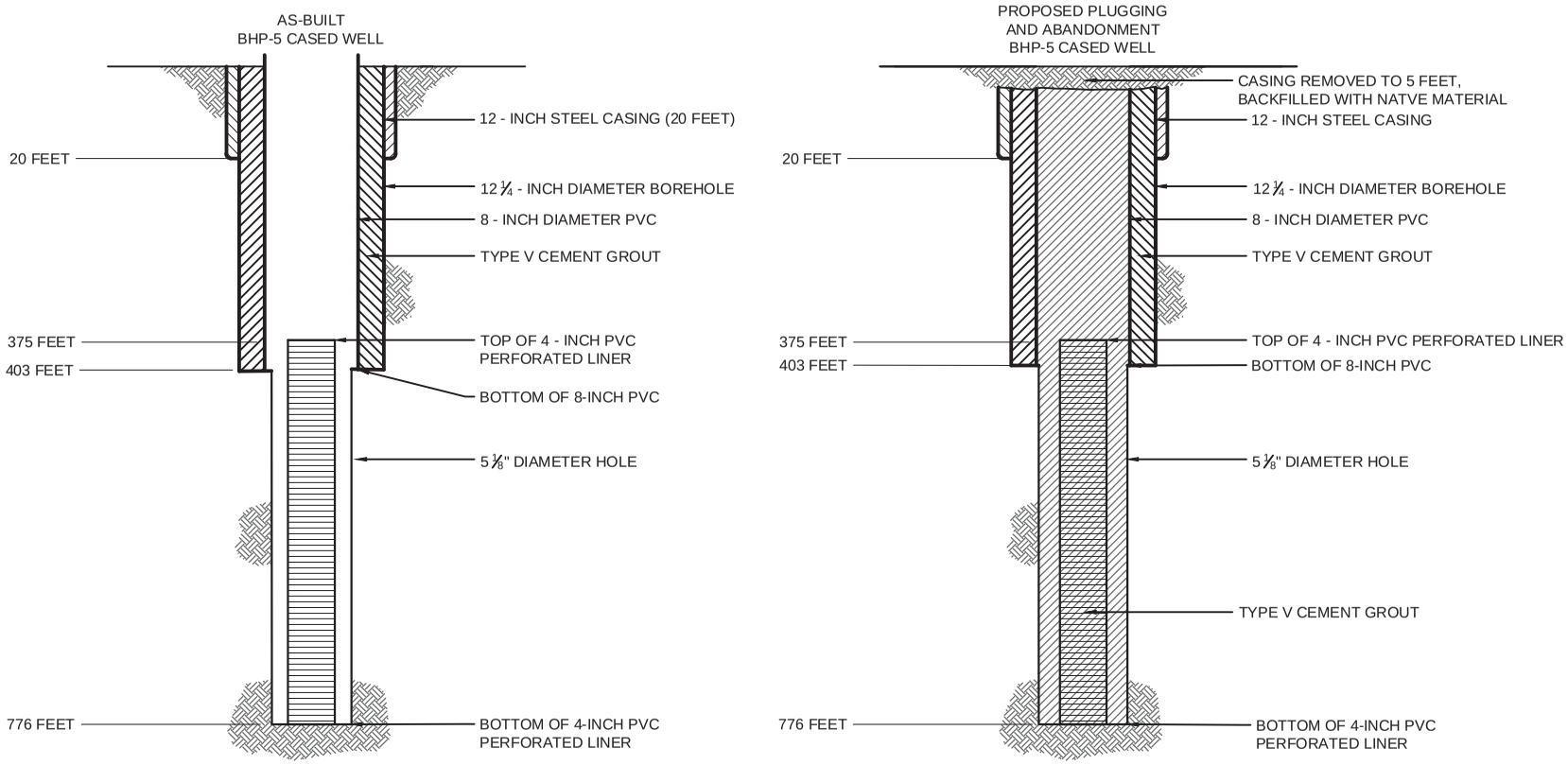
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-5.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 4, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-5 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

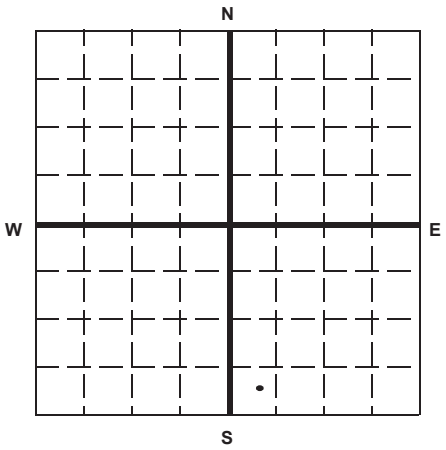
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 385 ft. frm (N/S) S Line of quarter section
and 485 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-6

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"		20	20	unknown
7"		415	415	10.625
1.5"		420	420	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	770	410					
Sacks of Cement To Be Used (each plug)	42	86					
Slurry Volume To Be Pumped (cu. ft.)	54	110					
Calculated Top of Plug (ft.)	410	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
410	805		

Estimated Cost to Plug Wells
$8,800

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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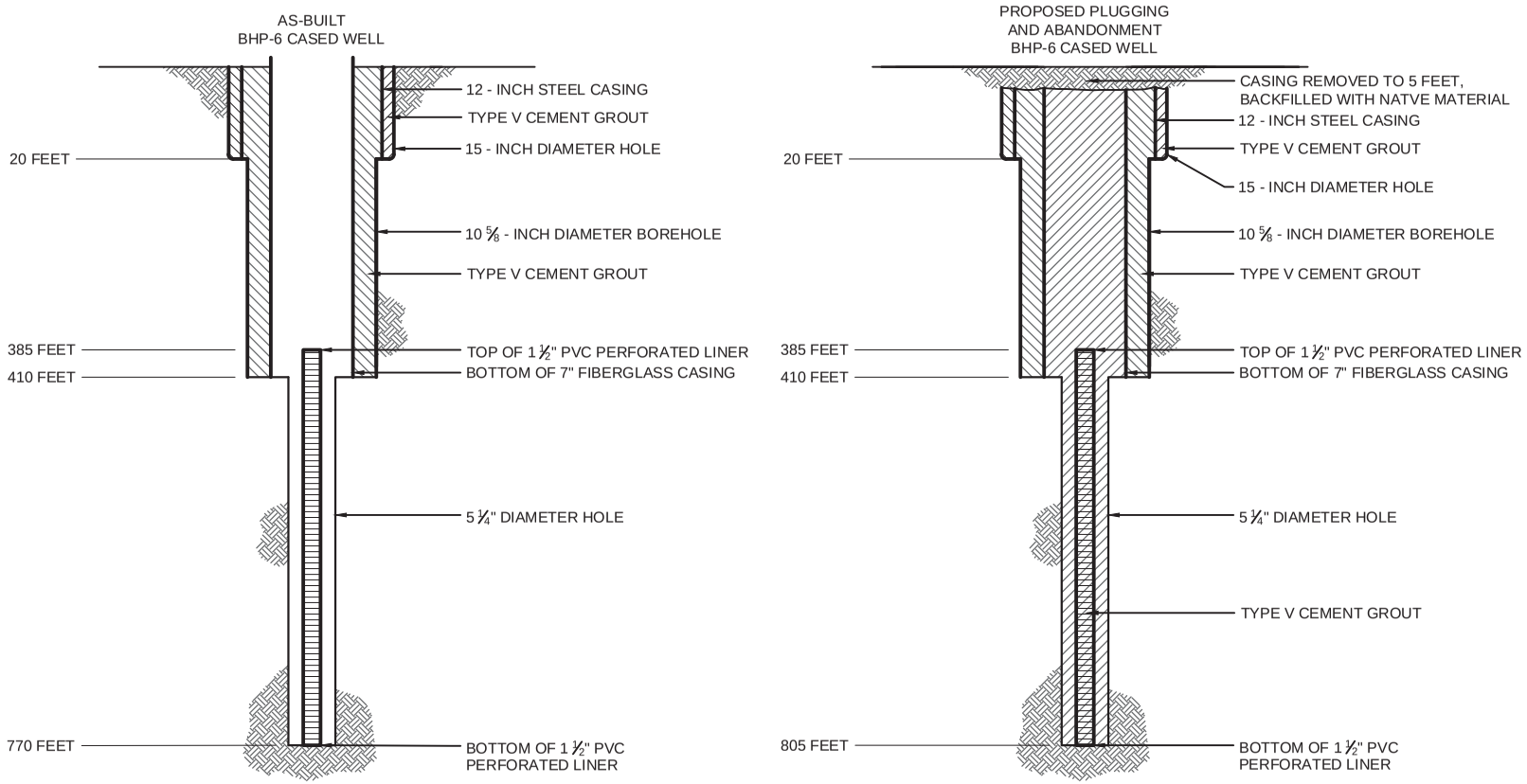
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-6.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-6 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

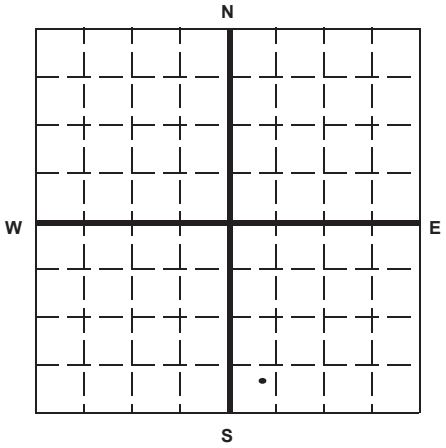
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 440 ft. frm (N/S) S Line of quarter section
and 435 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-7

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"		20	20	unknown
7"		410	410	10.625
1.5"		360	360	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	760	410					
Sacks of Cement To Be Used (each plug)	41	86					
Slurry Volume To Be Pumped (cu. ft.)	53	110					
Calculated Top of Plug (ft.)	410	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
410	760		

Estimated Cost to Plug Wells
$8,800

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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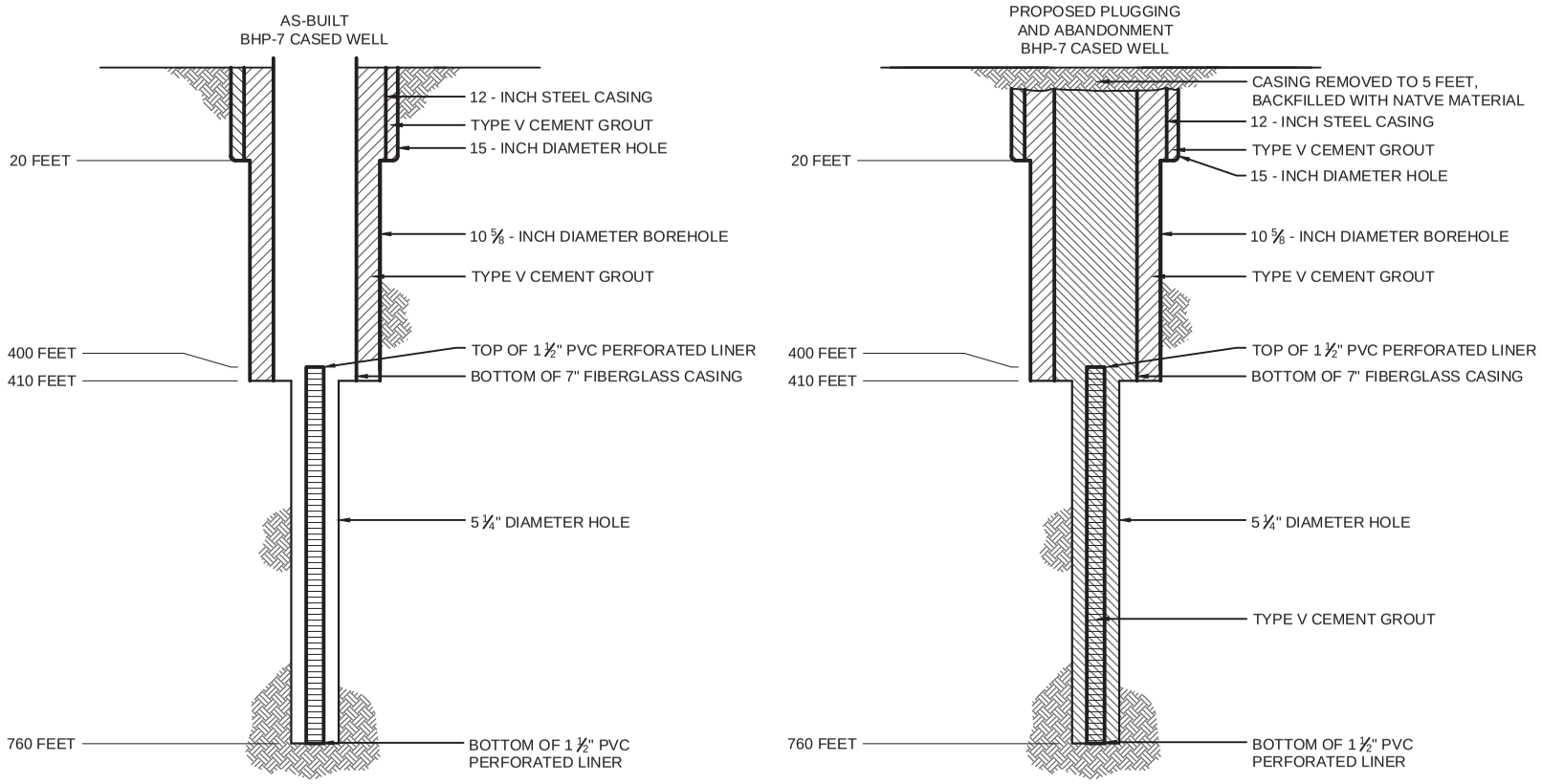
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-7.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-7 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
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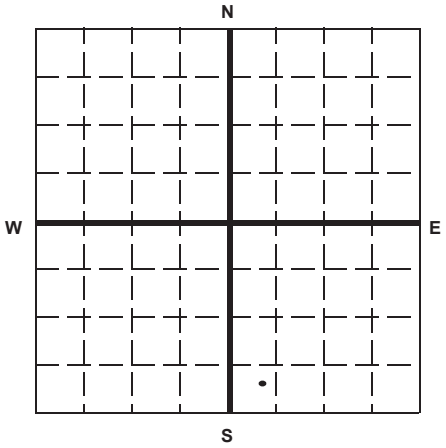
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 385 ft. frm (N/S) S Line of quarter section
and 385 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-8

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"		20	20	15
7"		410	410	10.625
1.5"		380	380	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	740	410					
Sacks of Cement To Be Used (each plug)	39	86					
Slurry Volume To Be Pumped (cu. ft.)	50	110					
Calculated Top of Plug (ft.)	410	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
410	780		

Estimated Cost to Plug Wells
$8,800

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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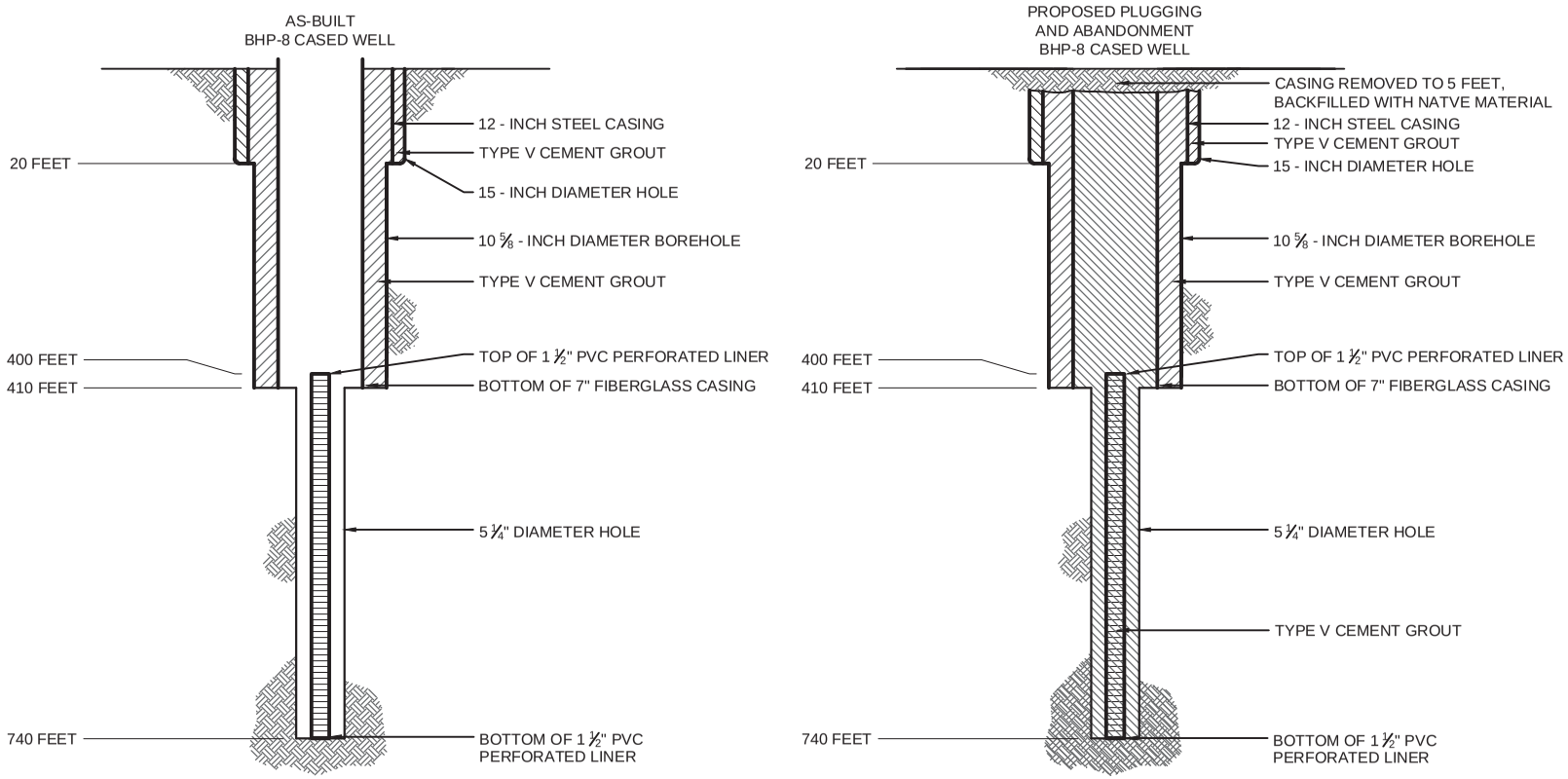
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-8.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-8 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

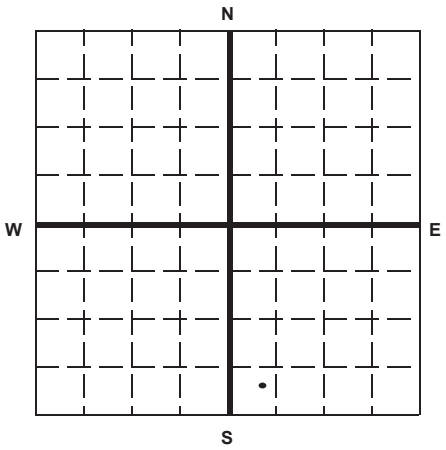
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 335 ft. frm (N/S) S Line of quarter section
and 435 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-9

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	410	410	10.625
1.5"	unknown	440	440	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	840	410					
Sacks of Cement To Be Used (each plug)	51	86					
Slurry Volume To Be Pumped (cu. ft.)	65	110					
Calculated Top of Plug (ft.)	410	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
410	840		

Estimated Cost to Plug Wells
$8,800

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

The public reporting and record keeping burden for this collection of information is estimated to average 4.5 hours for operators of Class I hazardous wells, 1.5 hours for operators of Class I non-hazardous wells, 3 hours for operators of Class II wells, and 1.5 hours for operators of Class III wells.
Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.
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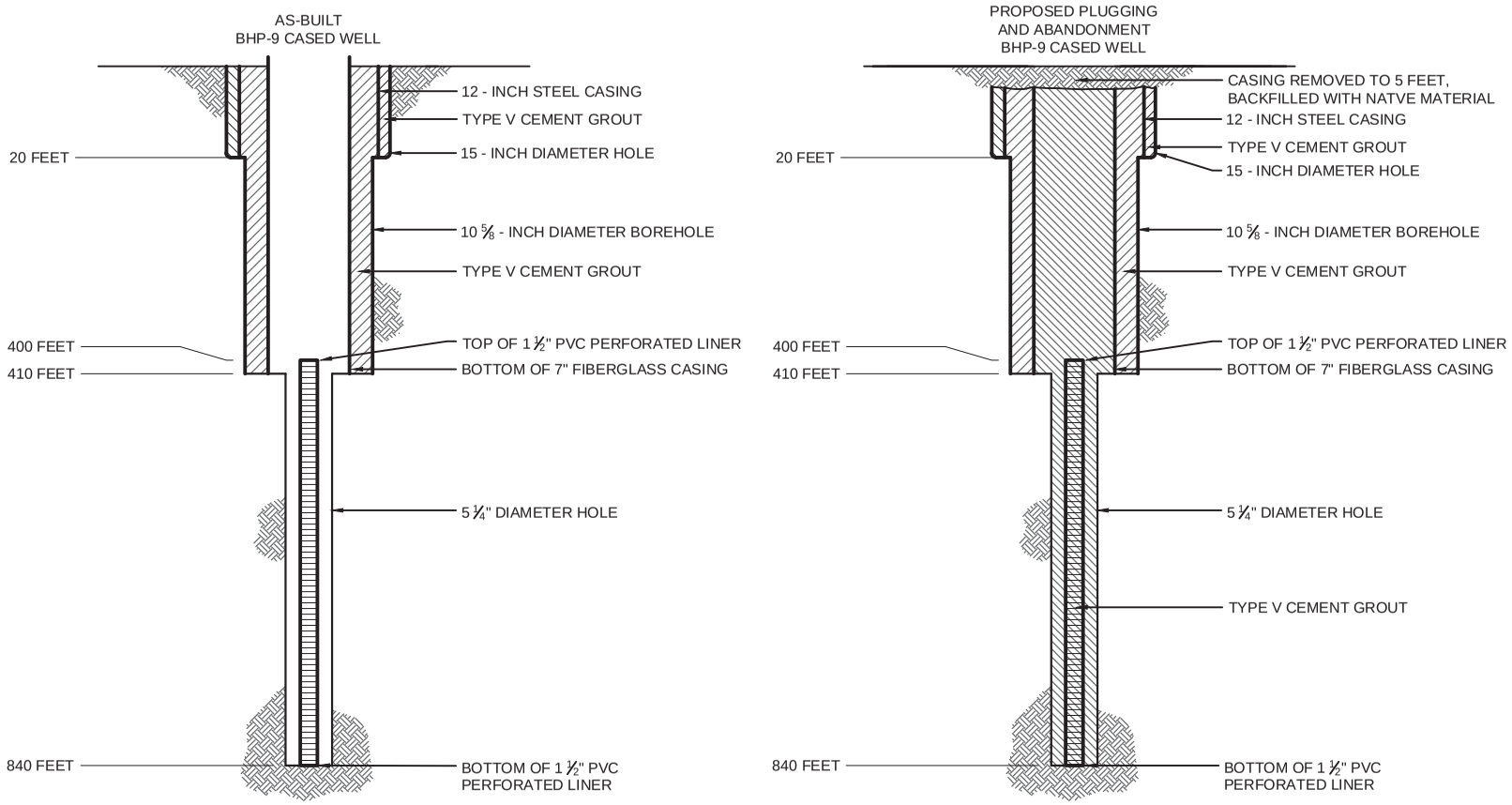
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-9.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

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HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-9 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

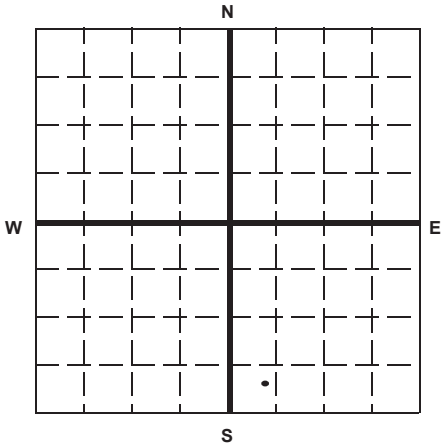
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 385 ft. frm (N/S) S Line of quarter section
and 535 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-10

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	400	400	10.625
1.5"	unknown	420	420	5.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.875	7					
Depth to Bottom of Tubing or Drill Pipe (ft	820	400					
Sacks of Cement To Be Used (each plug)	50	84					
Slurry Volume To Be Pumped (cu. ft.)	63	107					
Calculated Top of Plug (ft.)	400	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
400	820		

Estimated Cost to Plug Wells
$8,800

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
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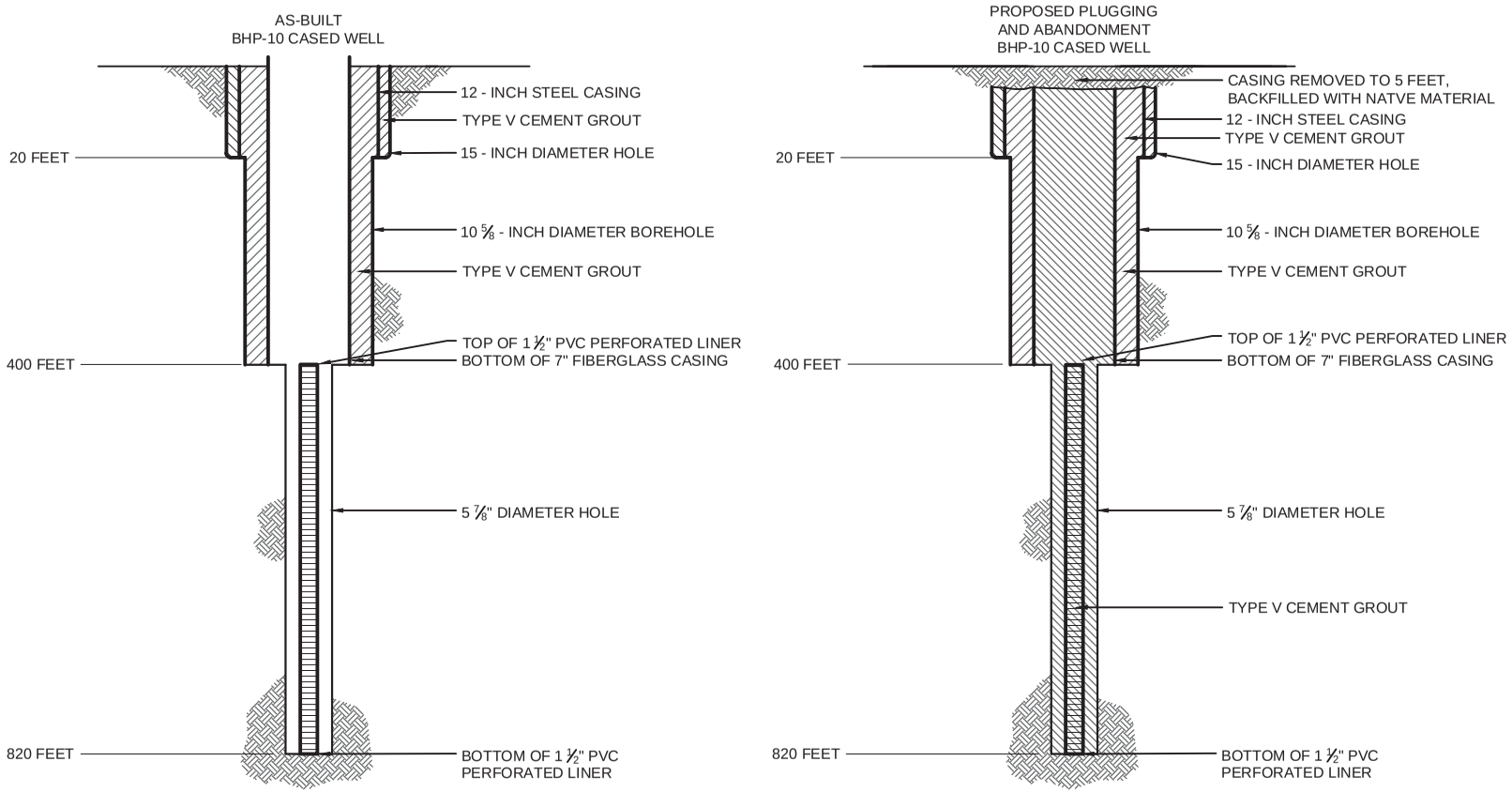
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-10.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-10 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
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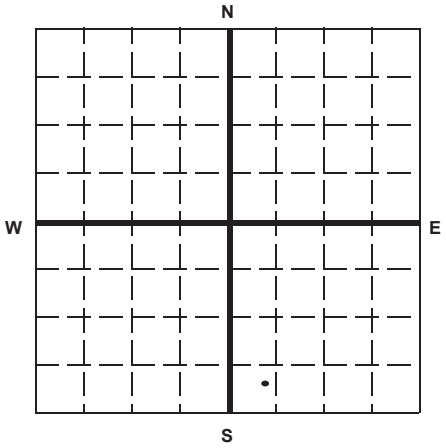
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 490 ft. frm (N/S) S Line of quarter section
and 435 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-11

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	400	400	10.625
4"	unknown	420	420	5.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.875	7					
Depth to Bottom of Tubing or Drill Pipe (ft	805	400					
Sacks of Cement To Be Used (each plug)	60	84					
Slurry Volume To Be Pumped (cu. ft.)	76	107					
Calculated Top of Plug (ft.)	400	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
400	805		

Estimated Cost to Plug Wells
$8,800

Certification

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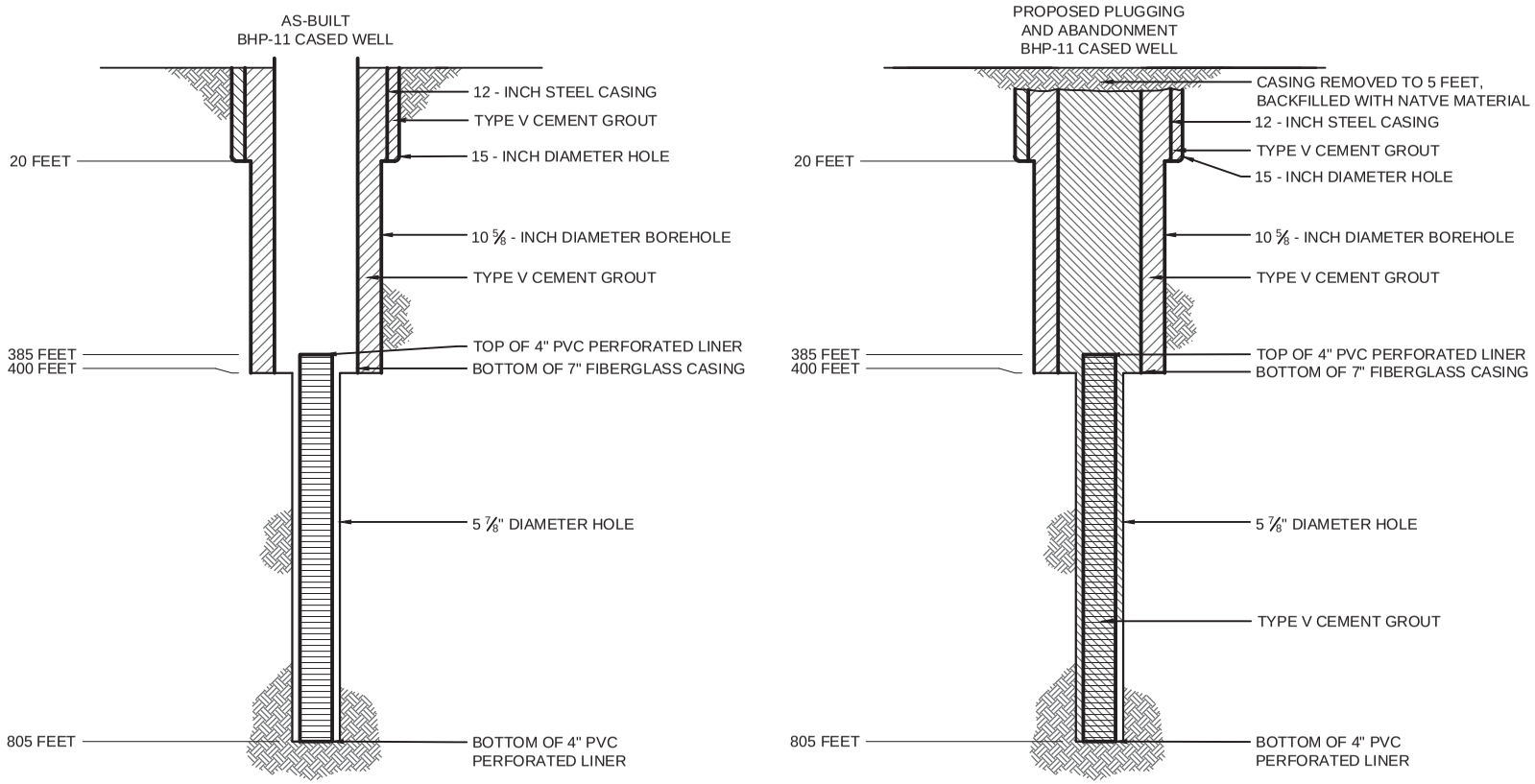
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-11.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

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HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-11 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
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Name and Address of Owner/Operator
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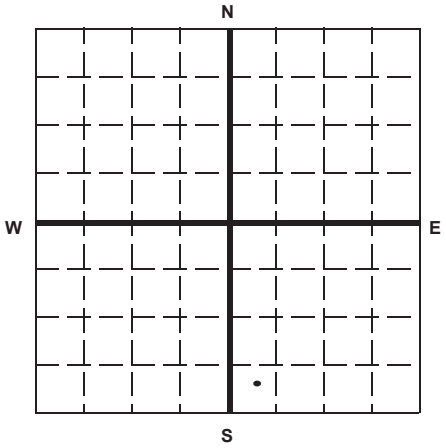
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 385 ft. frm (N/S) S Line of quarter section
and 335 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-12

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	400	400	10.625
4"	unknown	380	380	5.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.875	7					
Depth to Bottom of Tubing or Drill Pipe (ft	770	400					
Sacks of Cement To Be Used (each plug)	55	84					
Slurry Volume To Be Pumped (cu. ft.)	70	107					
Calculated Top of Plug (ft.)	400	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
400	770		

Estimated Cost to Plug Wells
$8,800

Certification

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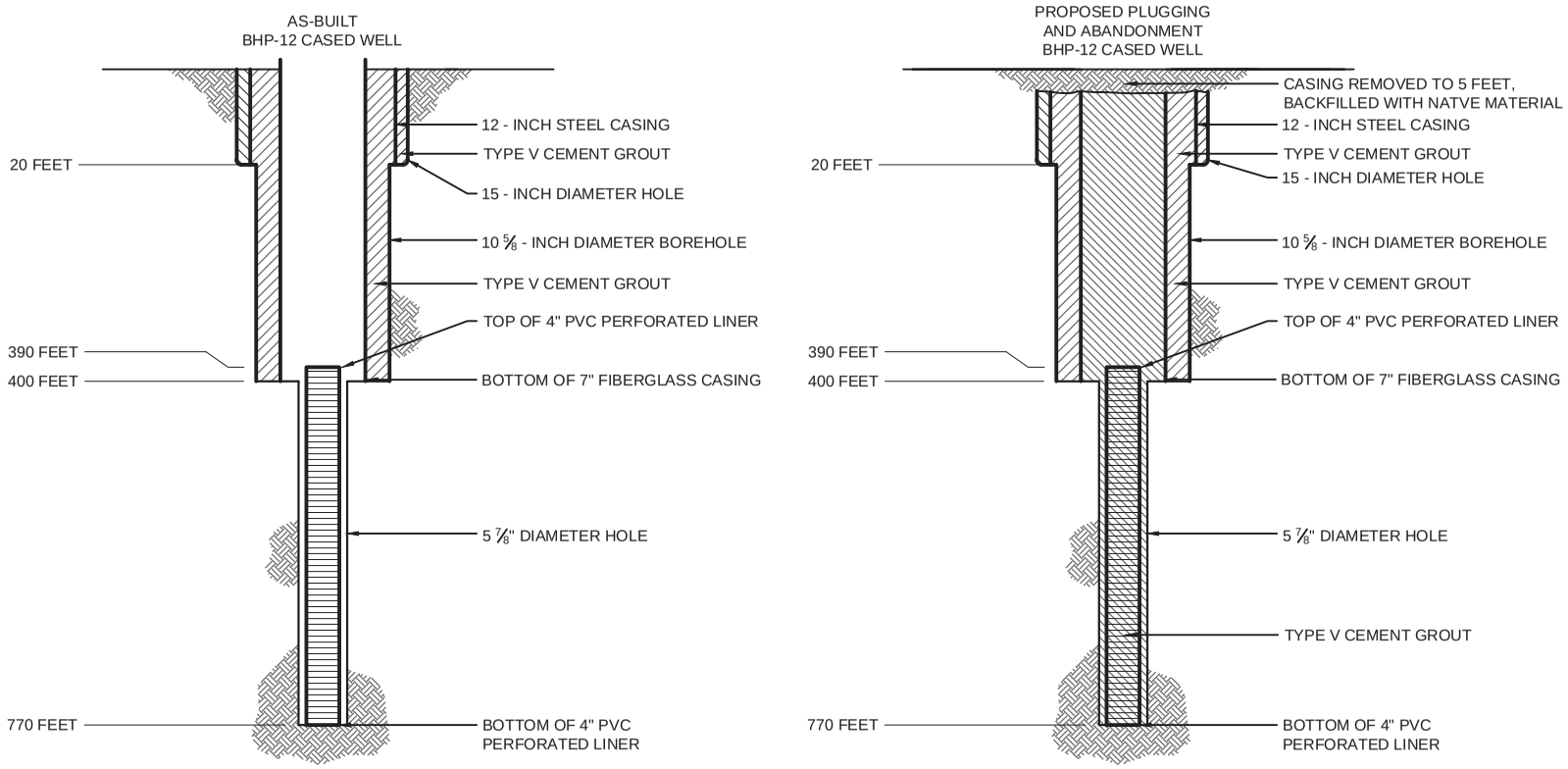
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-12.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

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HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-12 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

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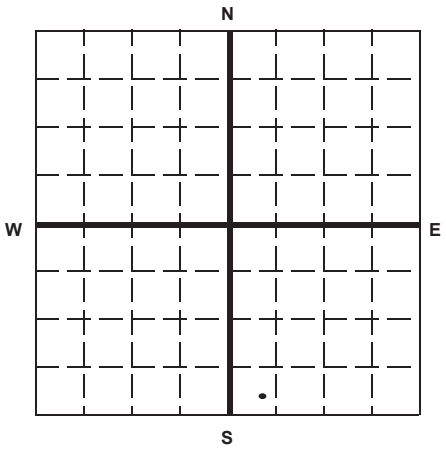
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 290 ft. frm (N/S) S Line of quarter section
and 435 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number BHP-13

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	420	420	10.625
4"	unknown	440	440	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	826	420					
Sacks of Cement To Be Used (each plug)	48	88					
Slurry Volume To Be Pumped (cu. ft.)	61	112					
Calculated Top of Plug (ft.)	420	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
420	826		

Estimated Cost to Plug Wells
$8,800

Certification

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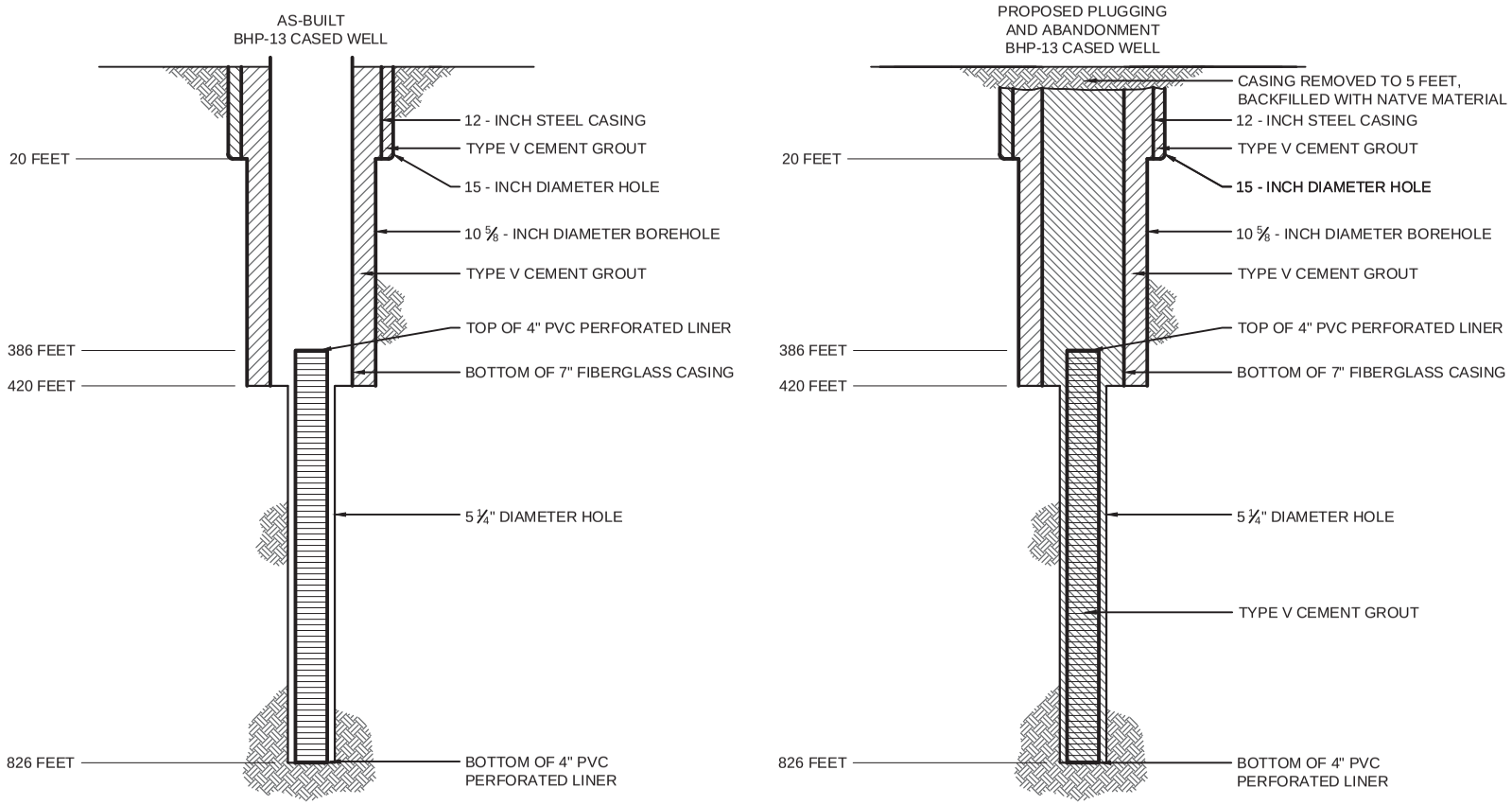
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-13.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL BHP-13 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

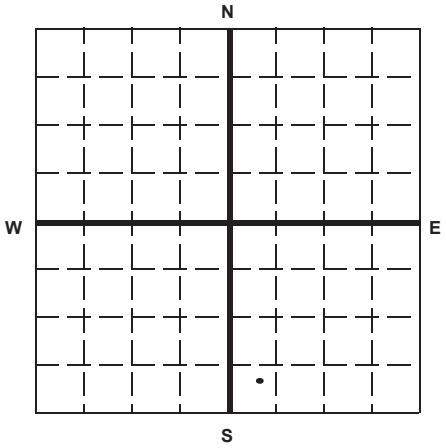
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 400 ft. frm (N/S) S Line of quarter section
and 445 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number CH-1

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
4"	unknown	780	780	9.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	4	9.875					
Depth to Bottom of Tubing or Drill Pipe (ft	410	789					
Sacks of Cement To Be Used (each plug)	28	158					
Slurry Volume To Be Pumped (cu. ft.)	36	202					
Calculated Top of Plug (ft.)	0	410					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
420	520		
560	660		
700	780		

Estimated Cost to Plug Wells
$8,800

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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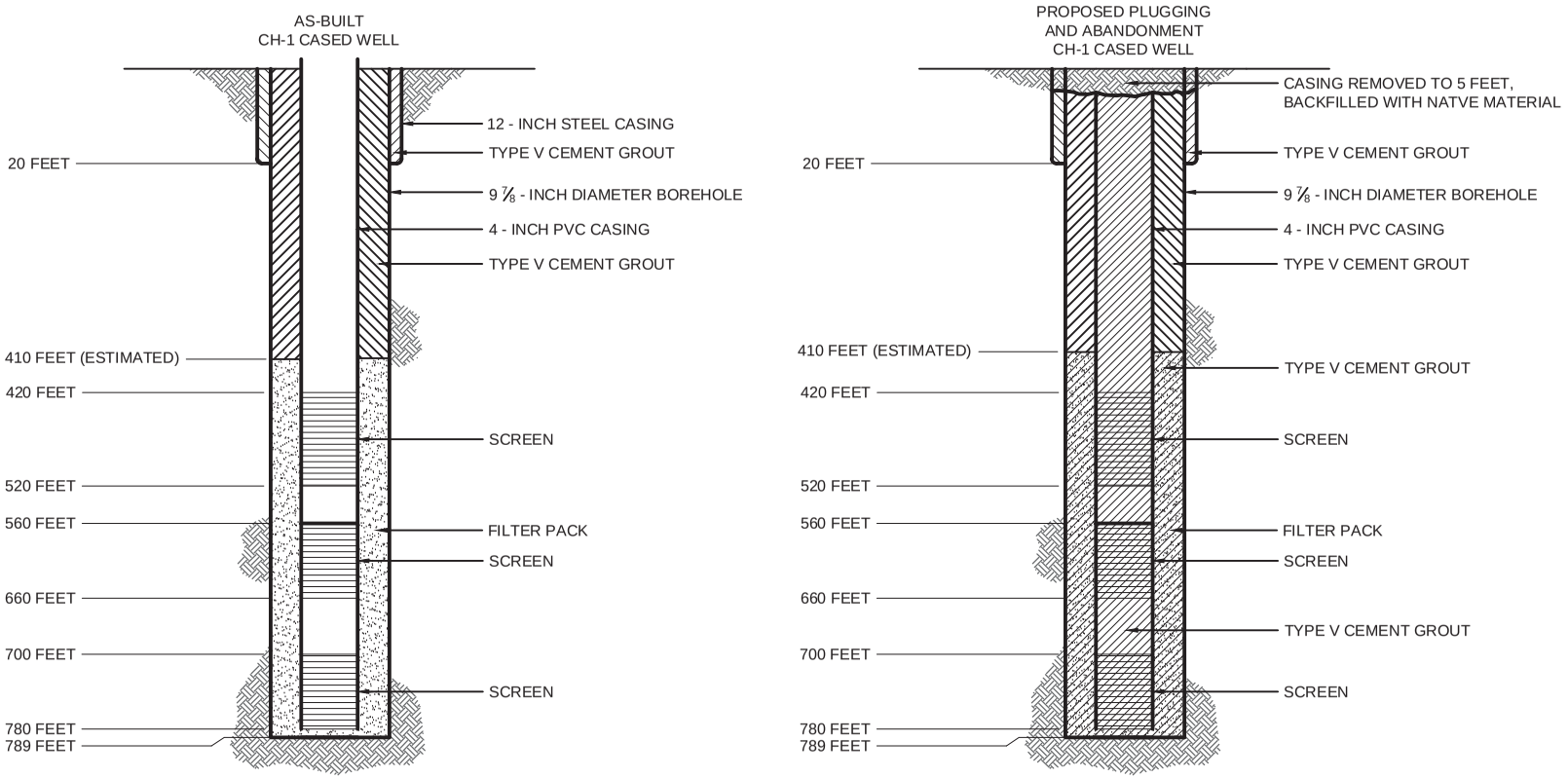
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\CH-1.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL CH-1 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

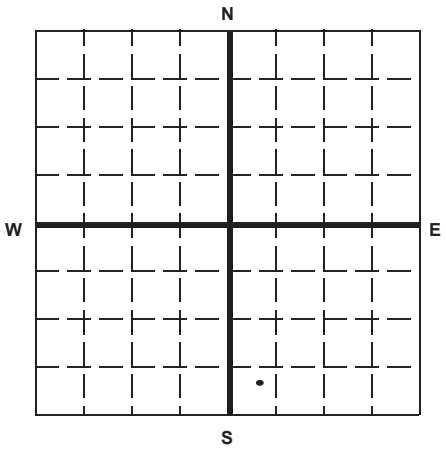
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 400 ft. frm (N/S) S Line of quarter section
and 470 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number CH-2

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
4"	unknown	780	780	9.875

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	4	9.875					
Depth to Bottom of Tubing or Drill Pipe (ft	410	775					
Sacks of Cement To Be Used (each plug)	28	158					
Slurry Volume To Be Pumped (cu. ft.)	36	202					
Calculated Top of Plug (ft.)	0	410					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
420	520		
560	660		
700	760		

Estimated Cost to Plug Wells
$8,800

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
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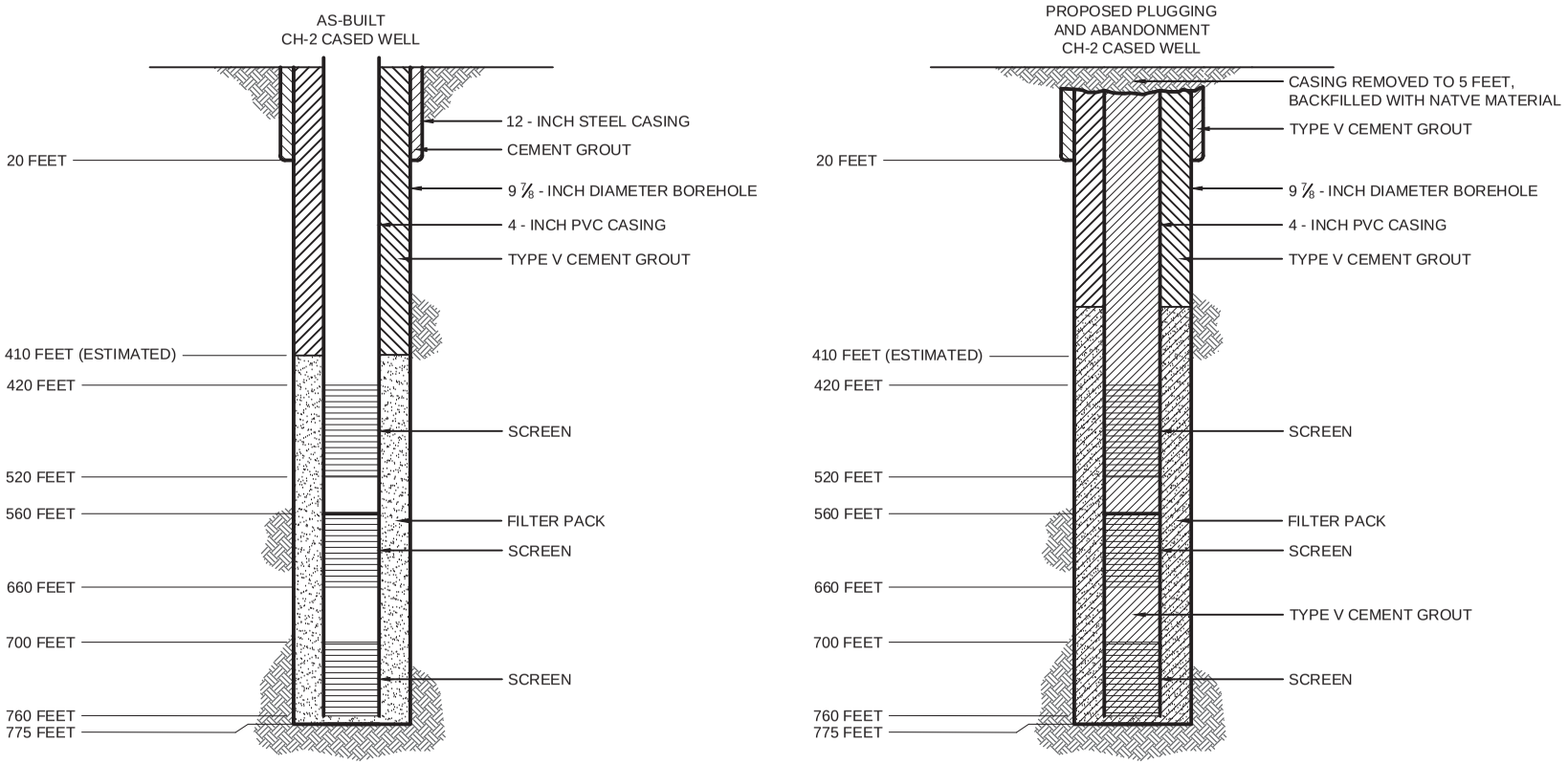
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\CH-2.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL CH-2 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
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1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
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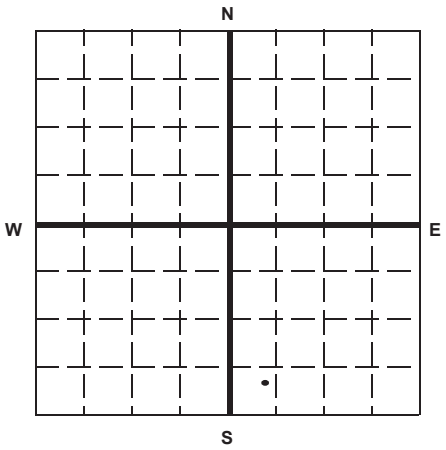
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 435 ft. frm (N/S) S Line of quarter section
and 535 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number OWB-1

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	420	420	10.625
1.5"	unknown	400	400	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	795	420					
Sacks of Cement To Be Used (each plug)	44	88					
Slurry Volume To Be Pumped (cu. ft.)	56	112					
Calculated Top of Plug (ft.)	420	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
420	795		

Estimated Cost to Plug Wells
$8,800

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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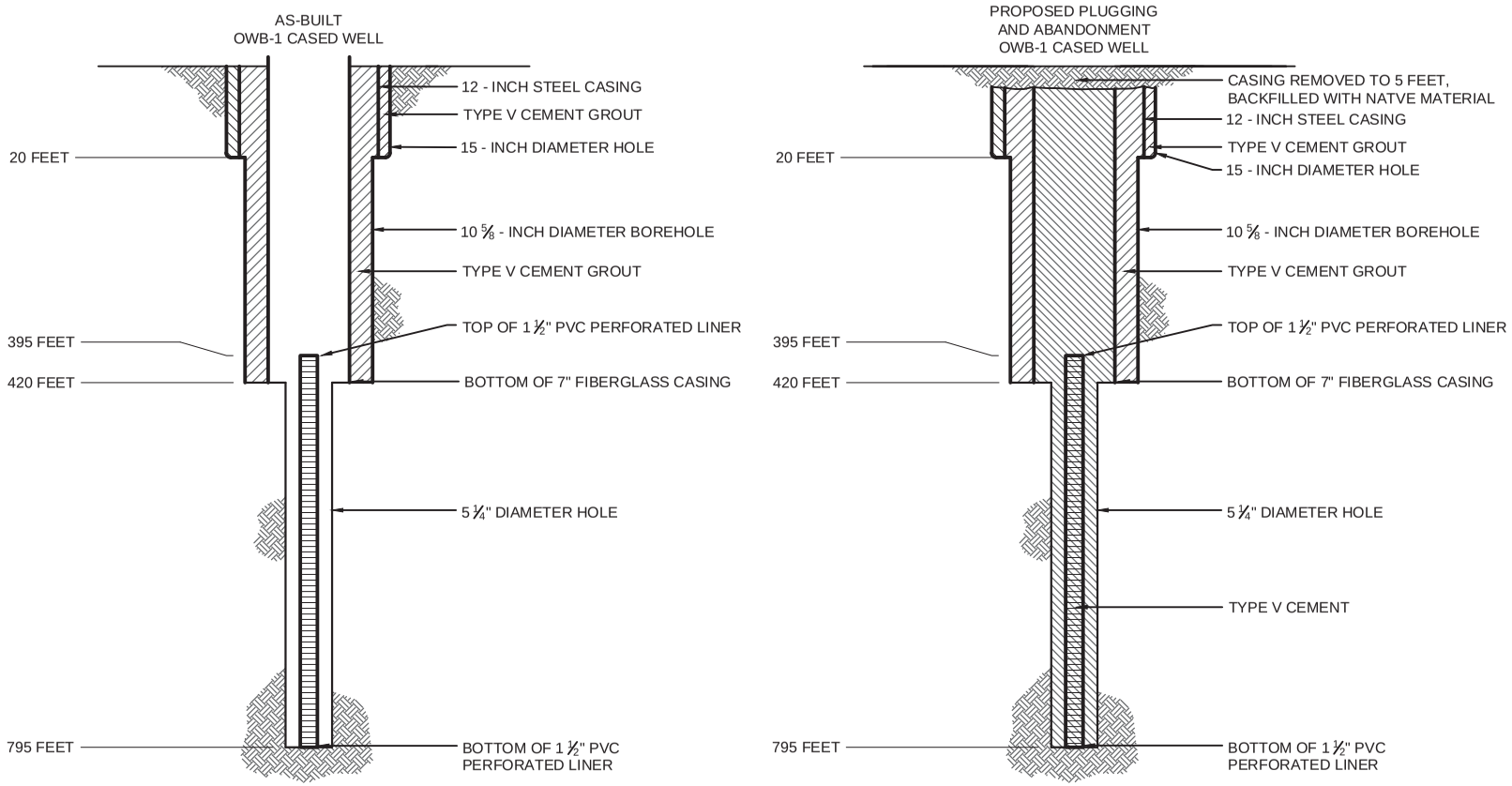
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\OWB-1.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL OWB-1 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
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1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
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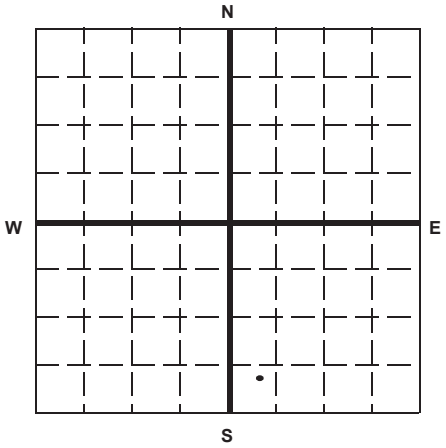
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 490 ft. frm (N/S) S Line of quarter section
and 385 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number OWB-2

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
4"	unknown	220	220	9.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	4	9.875					
Depth to Bottom of Tubing or Drill Pipe (ft	200	220					
Sacks of Cement To Be Used (each plug)	14	8					
Slurry Volume To Be Pumped (cu. ft.)	17	11					
Calculated Top of Plug (ft.)	0	200					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type 5					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
200	220		

Estimated Cost to Plug Wells
$8,800

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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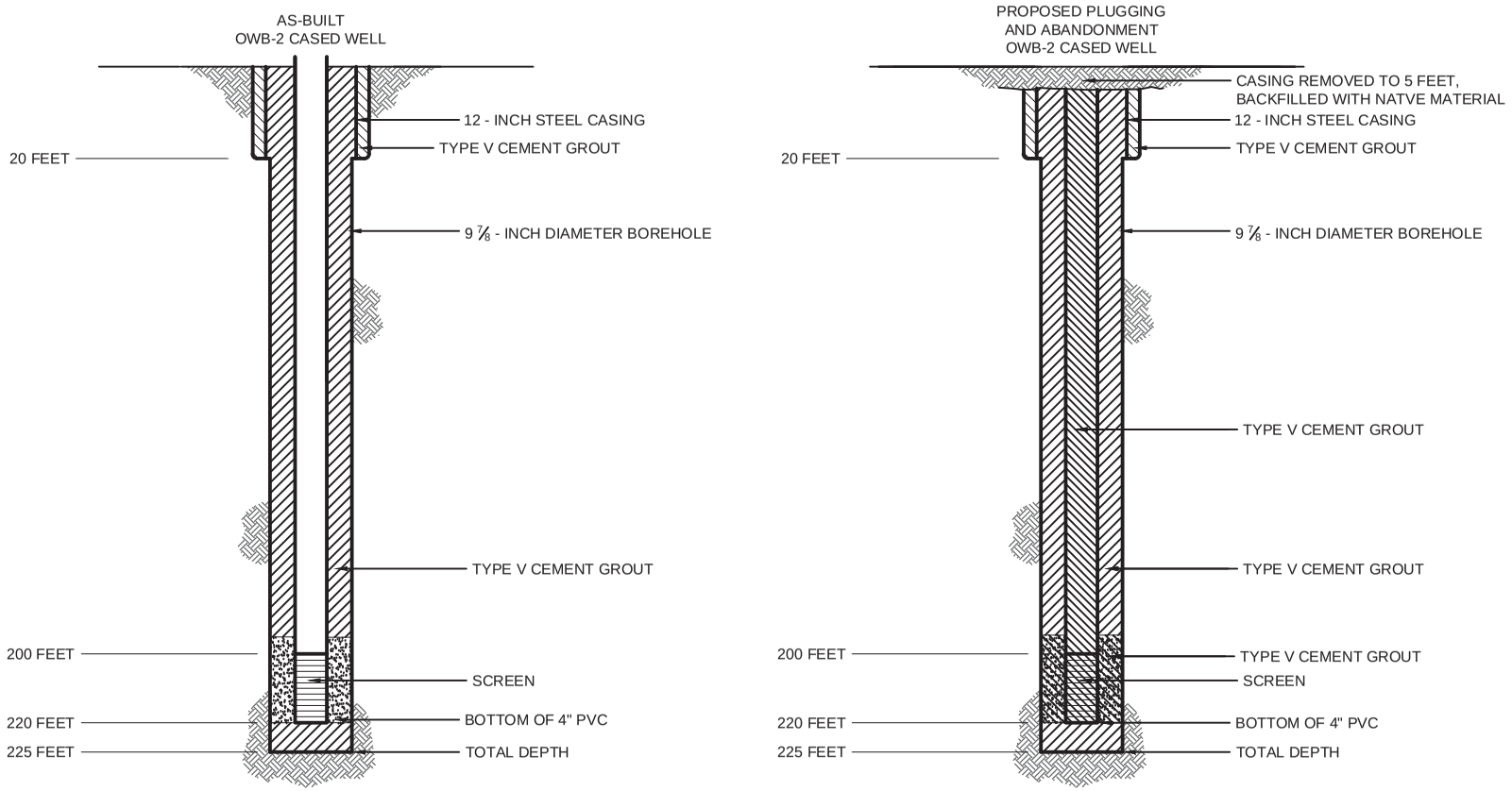
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\OWB-2.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL OWB-2 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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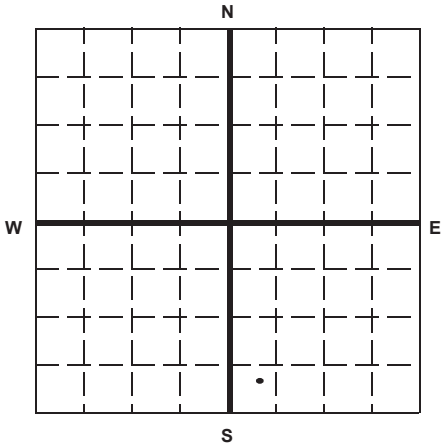

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 440 ft. frm (N/S) S Line of quarter section
and 335 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number OWB-3

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	420	420	10.625
1.5"	unknown	400	400	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	796	420					
Sacks of Cement To Be Used (each plug)	44	88					
Slurry Volume To Be Pumped (cu. ft.)	57	112					
Calculated Top of Plug (ft.)	420	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
420	796		

Estimated Cost to Plug Wells
$8,800

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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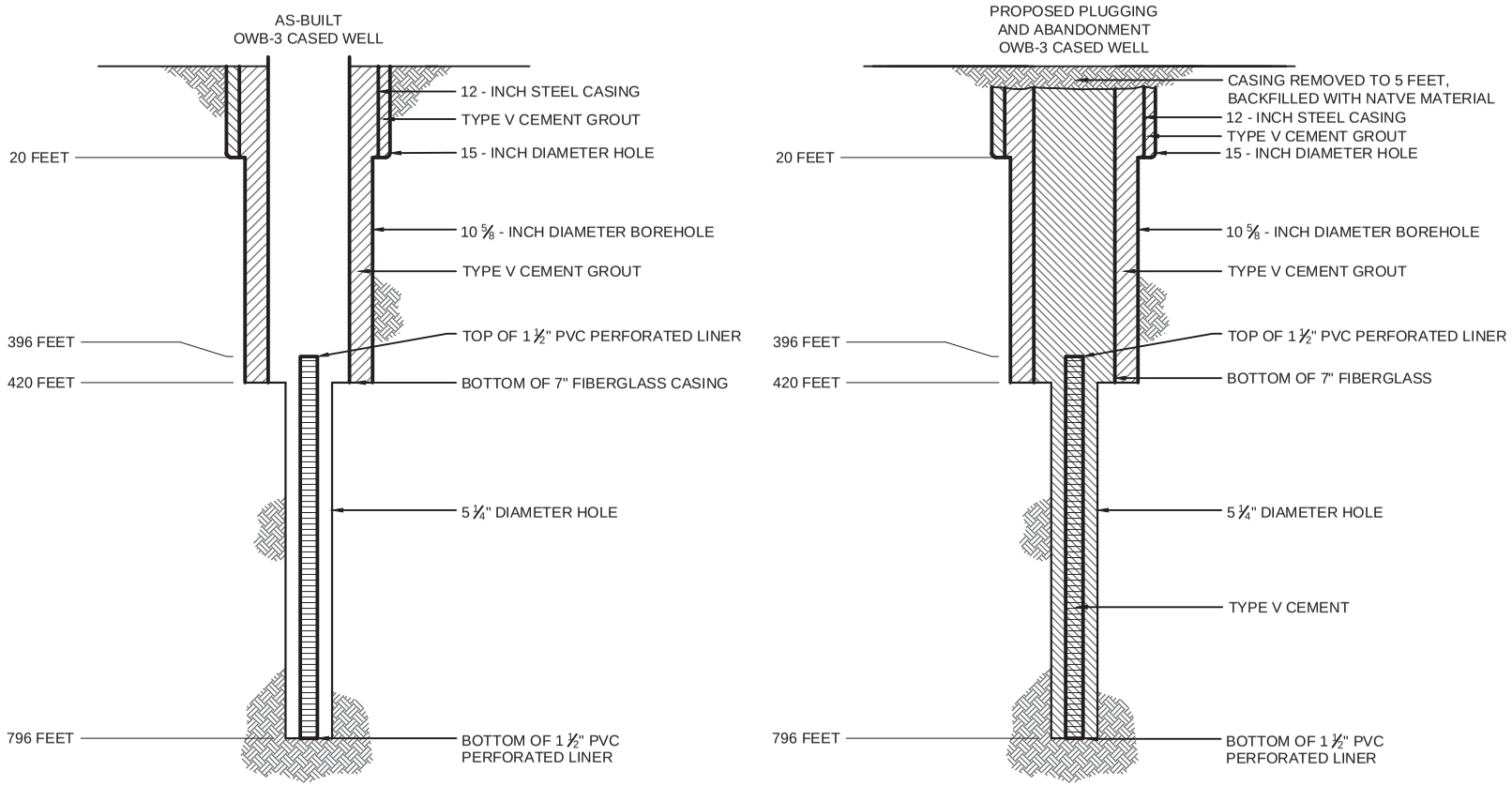
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\OWB-3.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL OWB-3 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

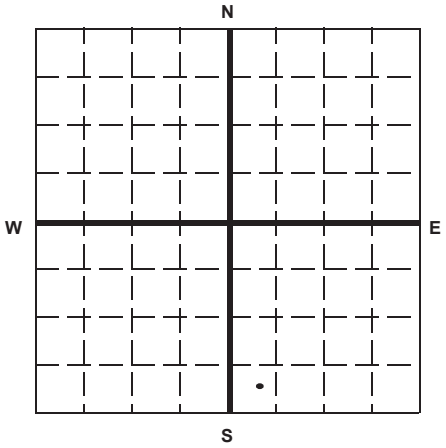
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 335 ft. frm (N/S) S Line of quarter section
and 335 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number OWB-4

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	410	410	10.625
1.5"	unknown	340	340	5.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	5.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	745	410					
Sacks of Cement To Be Used (each plug)	40	86					
Slurry Volume To Be Pumped (cu. ft.)	50	110					
Calculated Top of Plug (ft.)	410	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
410	745		

Estimated Cost to Plug Wells
$8,800

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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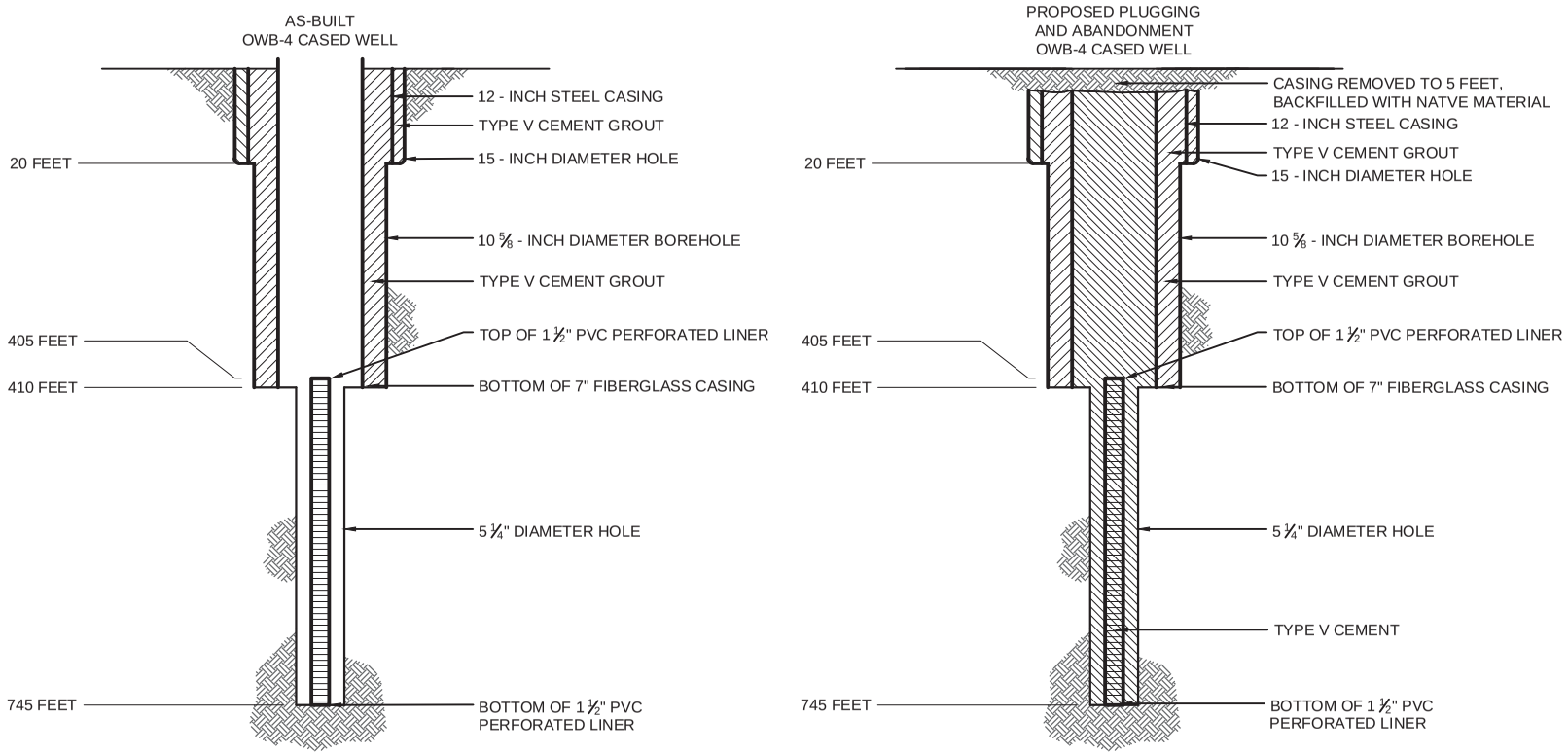
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\OWB-4.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL OWB-4 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

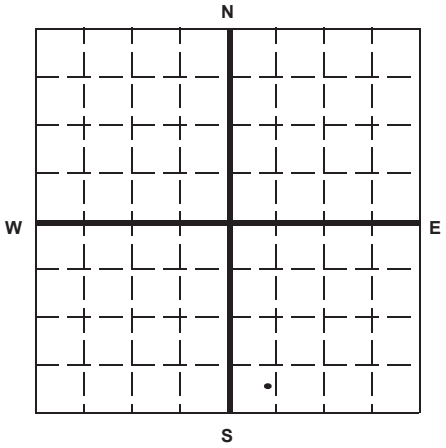
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 335 ft. frm (N/S) S Line of quarter section
and 535 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number OWB-5

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
12"	unknown	20	20	15
7"	unknown	420	420	10.625
1.5"	unknown	360	360	6.25

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	6.25	7					
Depth to Bottom of Tubing or Drill Pipe (ft	765	420					
Sacks of Cement To Be Used (each plug)	58	88					
Slurry Volume To Be Pumped (cu. ft.)	74	112					
Calculated Top of Plug (ft.)	420	0					
Measured Top of Plug (if tagged ft.)	NA	NA					
Slurry Wt. (Lb./Gal.)	15.4	15.4					
Type Cement or Other Material (Class III)	Type V	Type V					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
420	765		

Estimated Cost to Plug Wells
$8,800

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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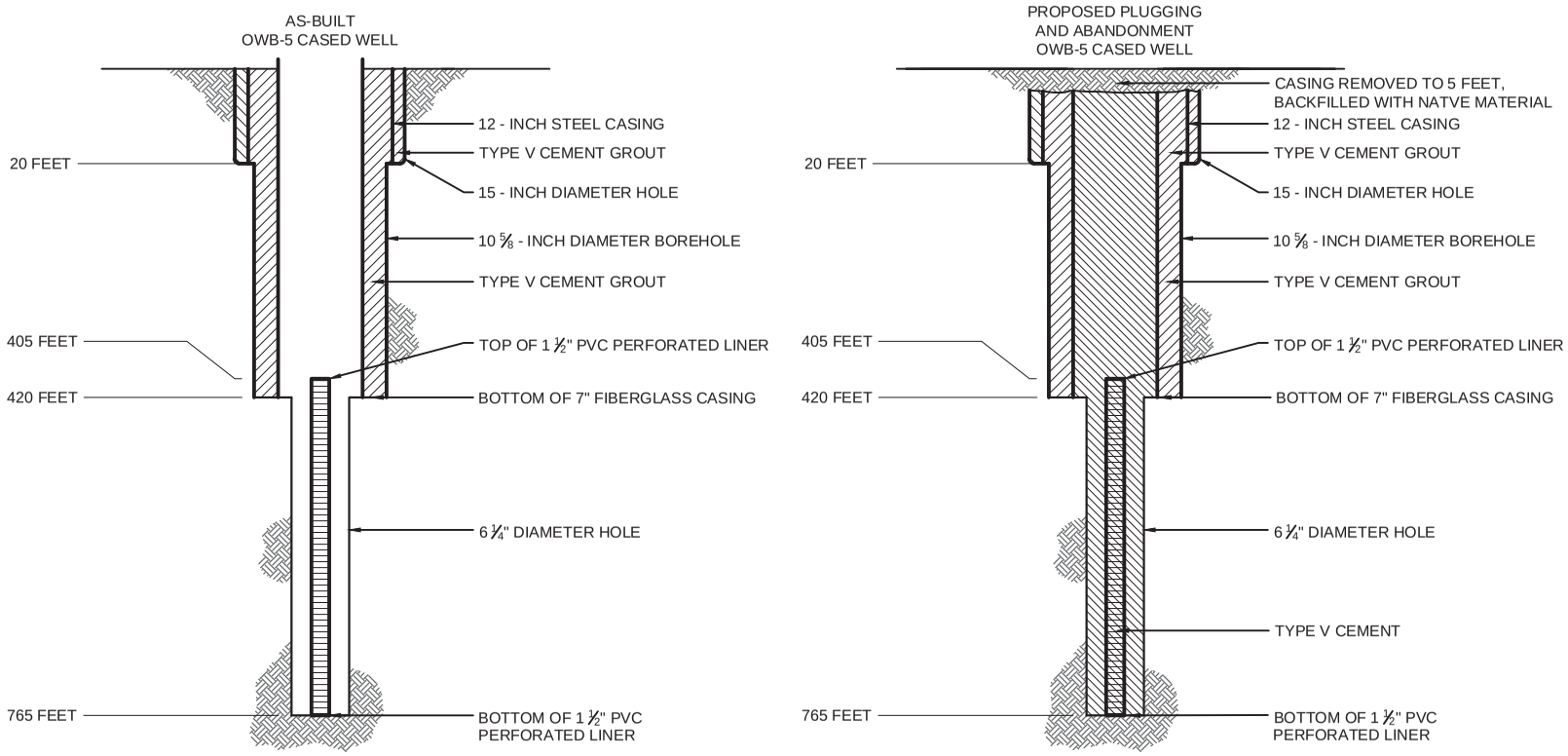
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\OWB-5.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER INC.
FLORENCE, ARIZONA

WELL OWB-5 SCHEMATIC DIAGRAM

SCALE: AS SHOWN
JULY 2014

FIGURE 1

PTF AOR WELLS

OMB No. 2040-0042 Approval Expires 11/30/2014

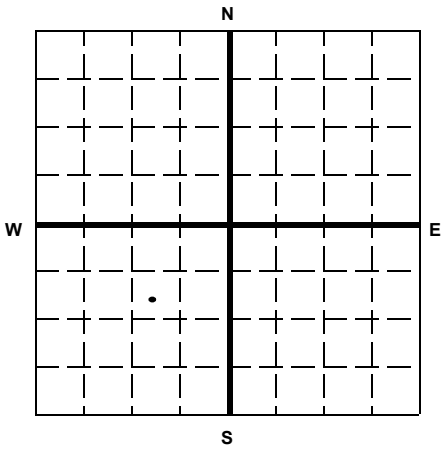
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1010 ft. frm (N/S) N Line of quarter section
and 1040 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number I-01

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other - 20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - well construciton and abandonment costs

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
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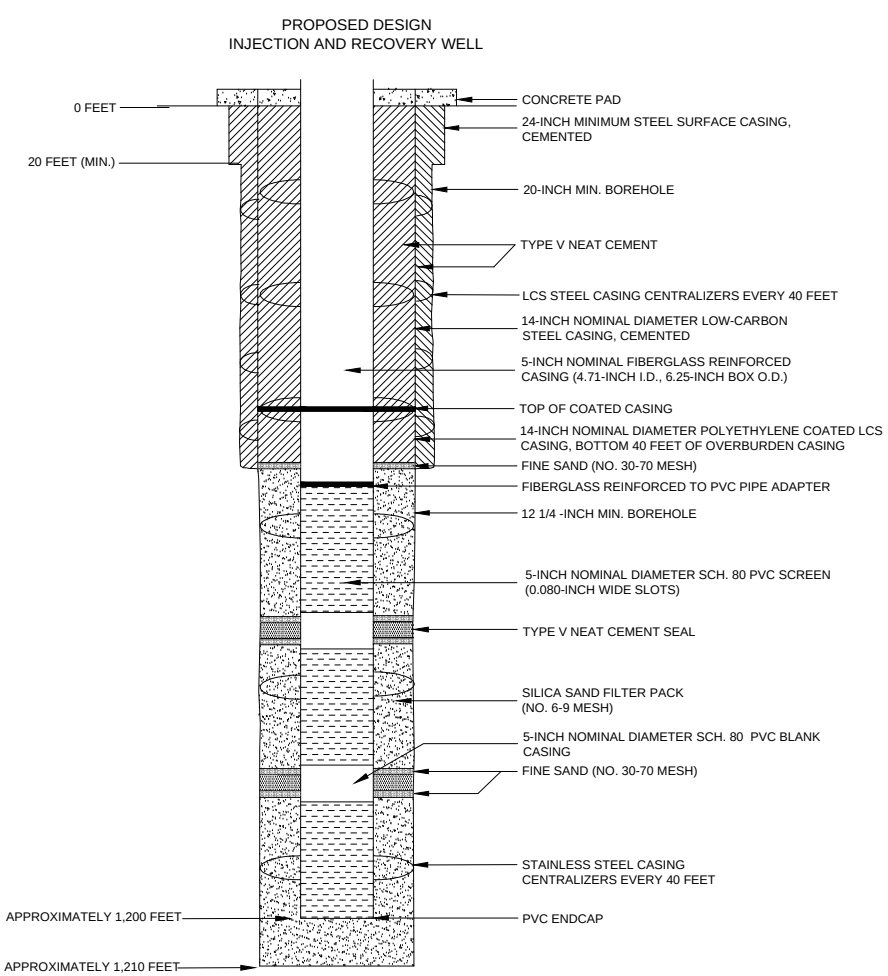
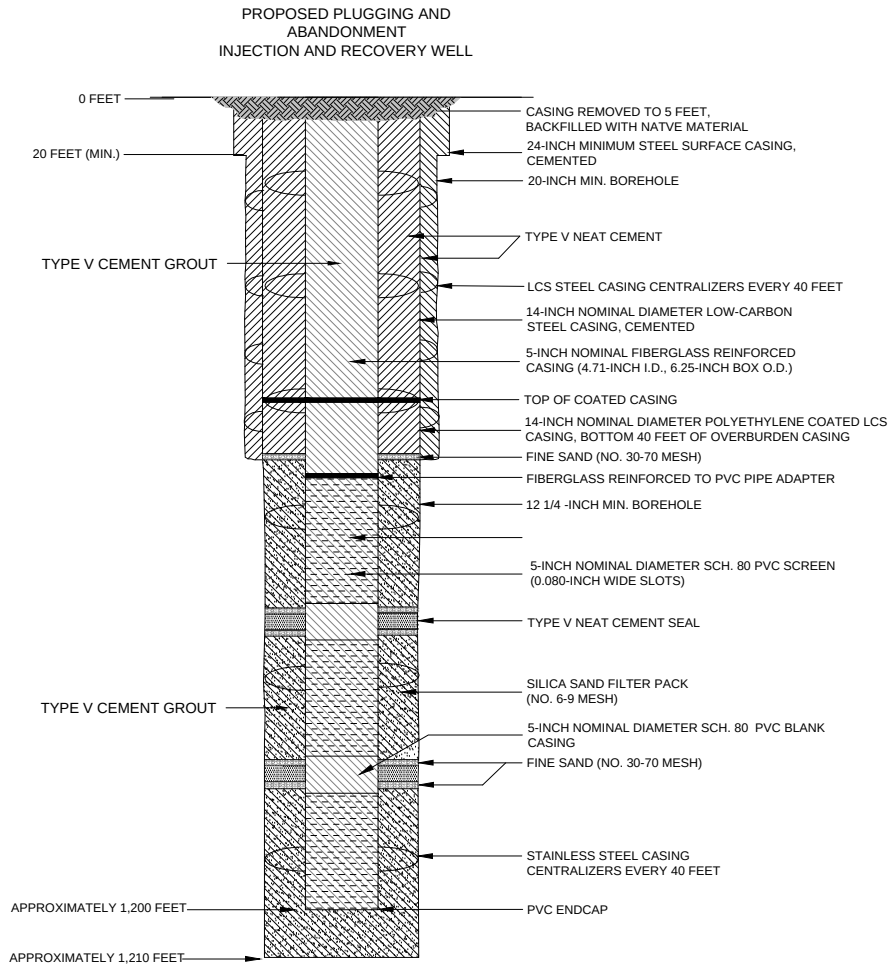
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-INJECTION_RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

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Florence Copper Project
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Name and Address of Owner/Operator
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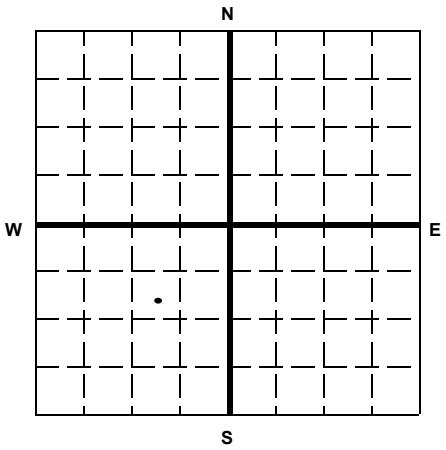
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1080 ft. frm (N/S) N Line of quarter section
and 975 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number I-02

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other - 20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

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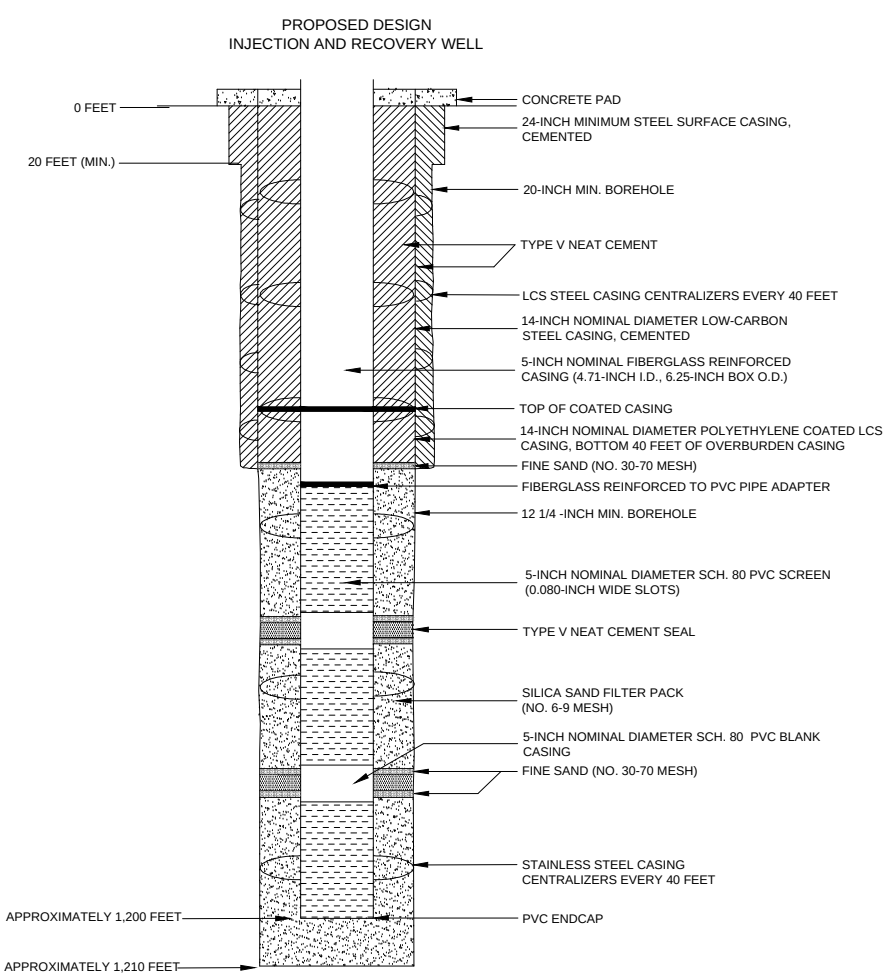
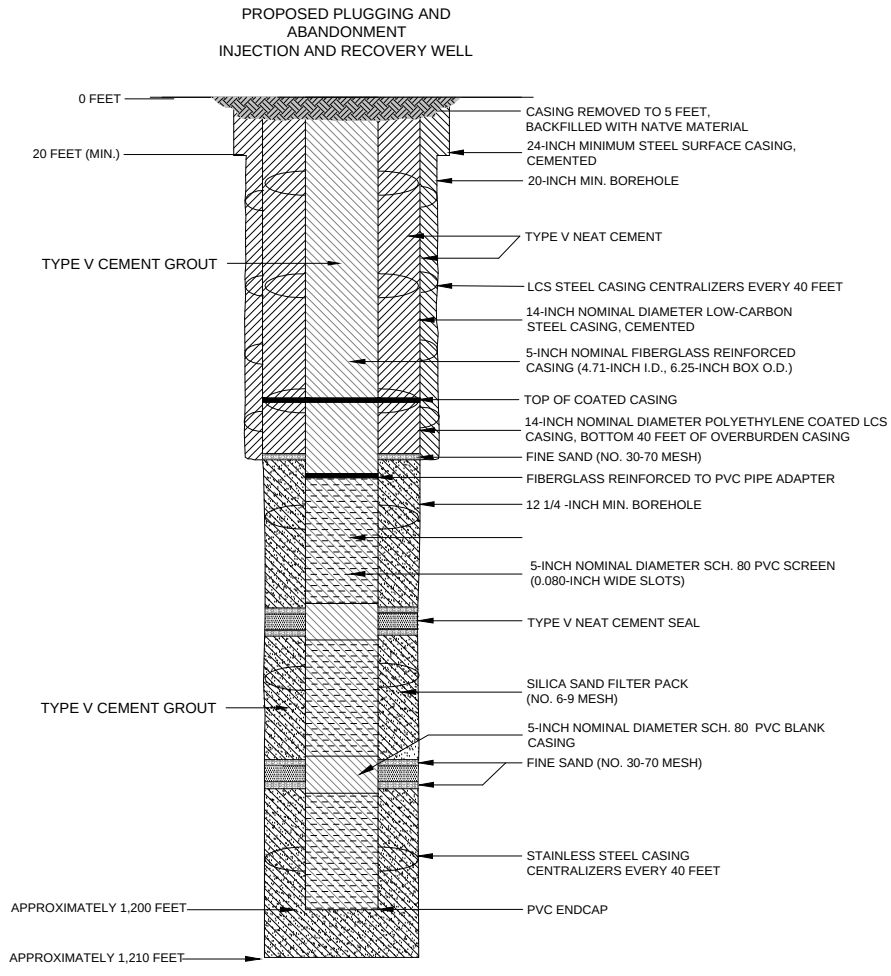
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

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HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

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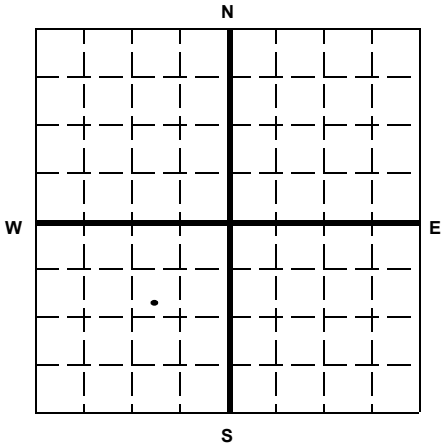

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1150 ft. frm (N/S) N Line of quarter section
and 1040 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number I-03

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other - 20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NS	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.
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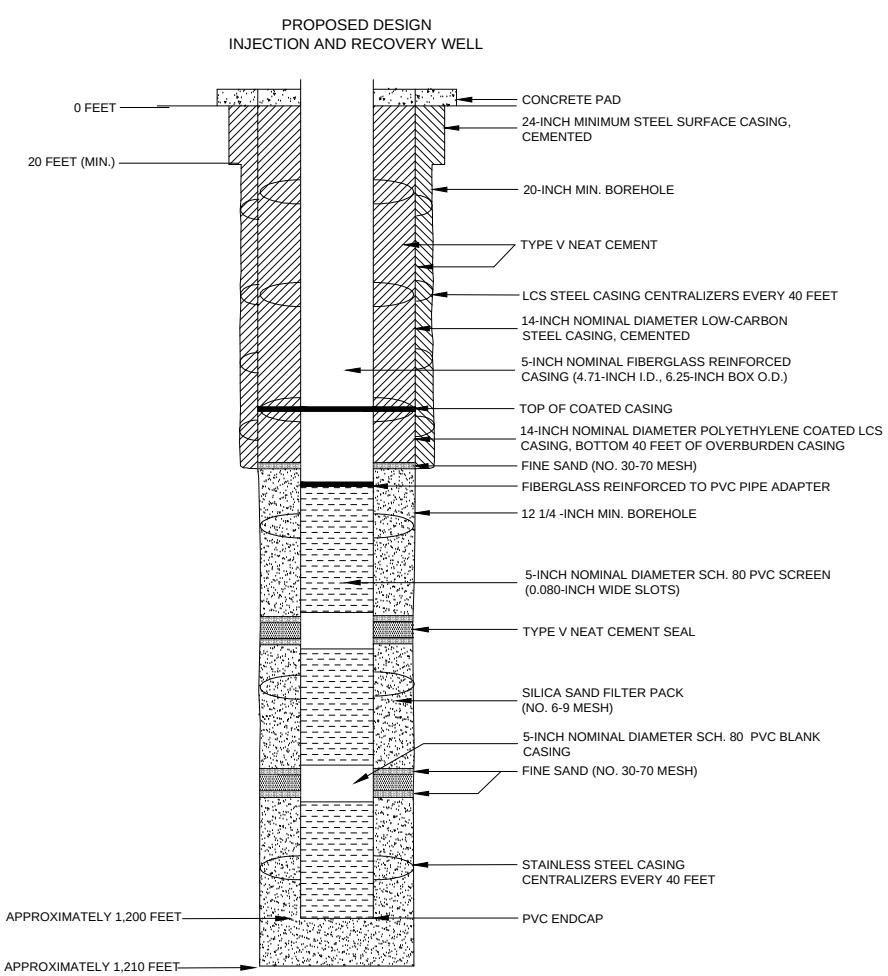
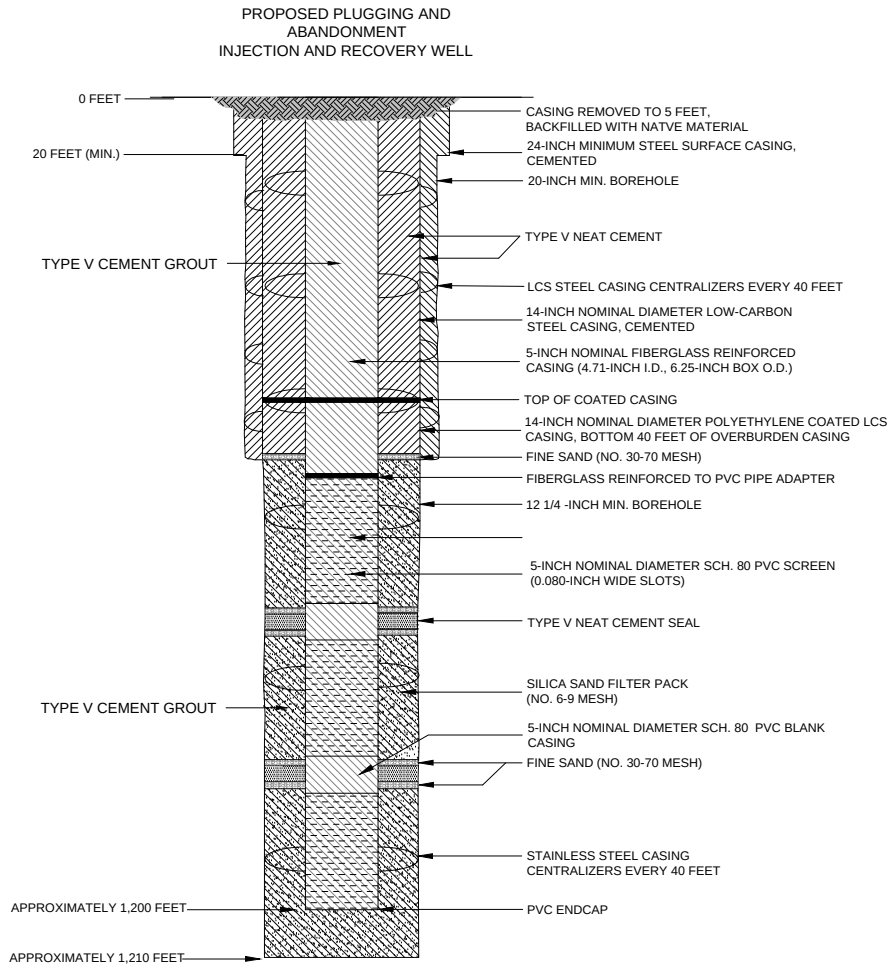
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-INJECTION_RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

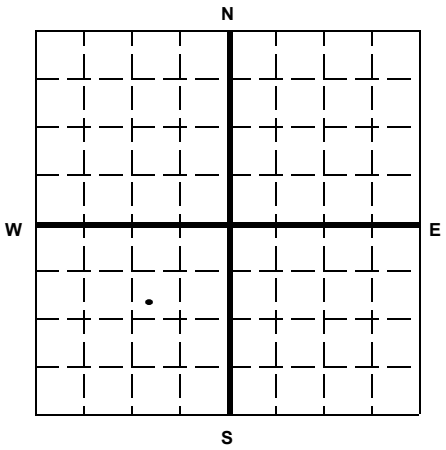
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1150 ft. frm (N/S) N Line of quarter section
and 1040 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- ☐ Individual Permit
- ☑ Area Permit
- ☐ Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- ☐ CLASS I
- ☐ CLASS II
  - ☐ Brine Disposal
  - ☐ Enhanced Recovery
  - ☐ Hydrocarbon Storage
- ☑ CLASS III

Well Number I-04

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- ☑ The Balance Method
- ☐ The Dump Bailer Method
- ☐ The Two-Plug Method
- ☑ Other - 20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NS	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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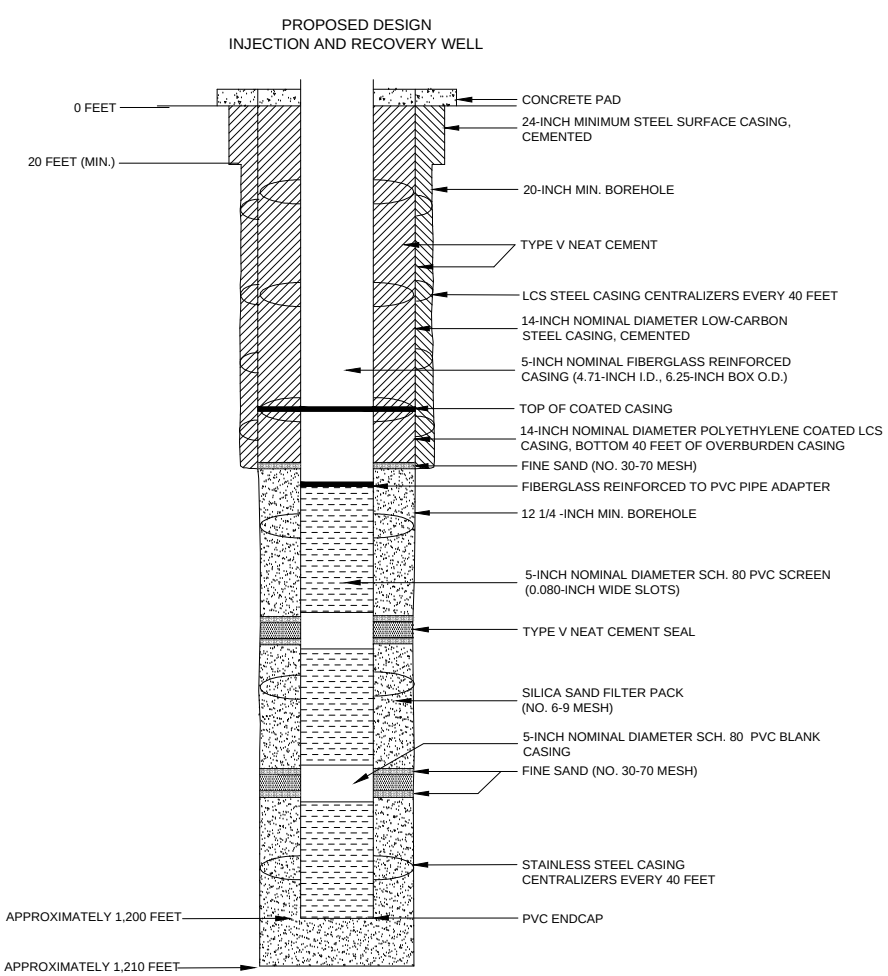
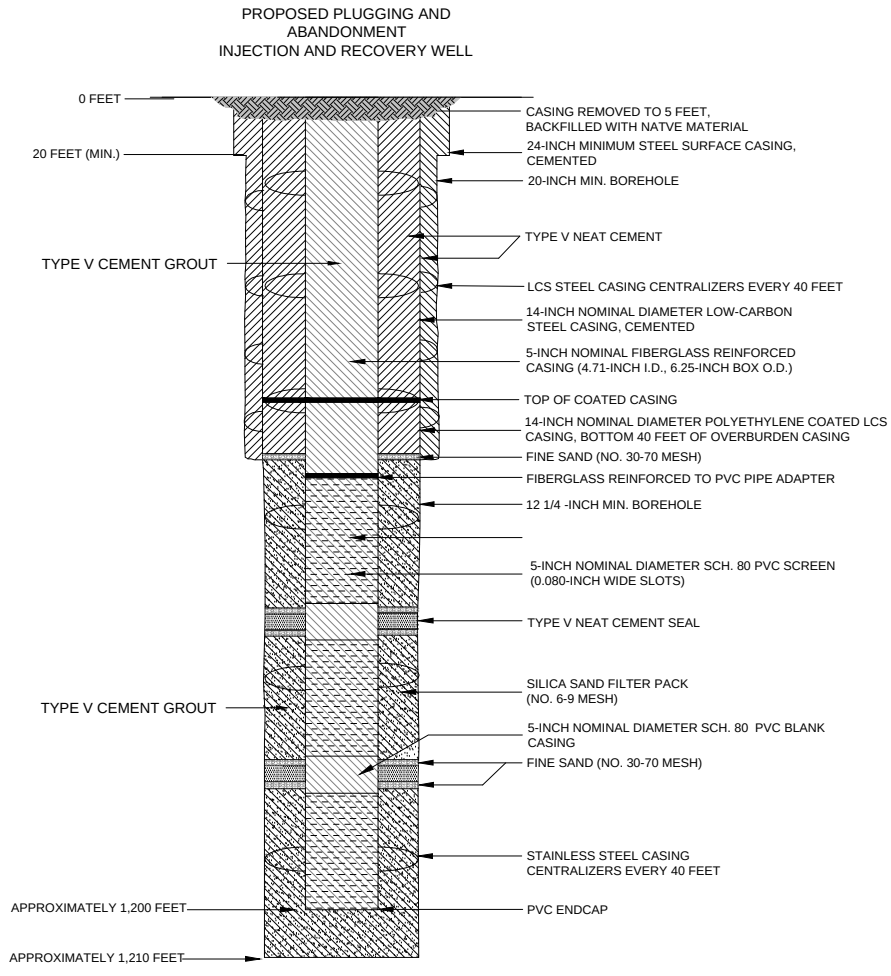
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-INJECTION_RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

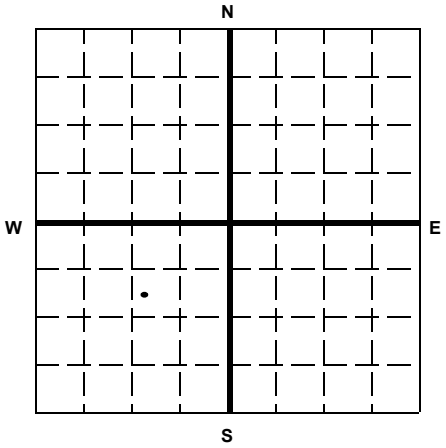
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
nw 1/4 of sw 1/4 of NE 1/4 of sw 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 955 ft. frm (N/S) N Line of quarter section
and 1175 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number M55-UBF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	45.68	20	20	20"
4"	45.68	240	240	9.86"
4"	3	20	20	9.86"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	9.86	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	220	260				
Sacks of Cement To Be Used (each plug)	18	77	18				
Slurry Volume To Be Pumped (cu. ft.)	22	98	23				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
240	260		

Estimated Cost to Plug Wells

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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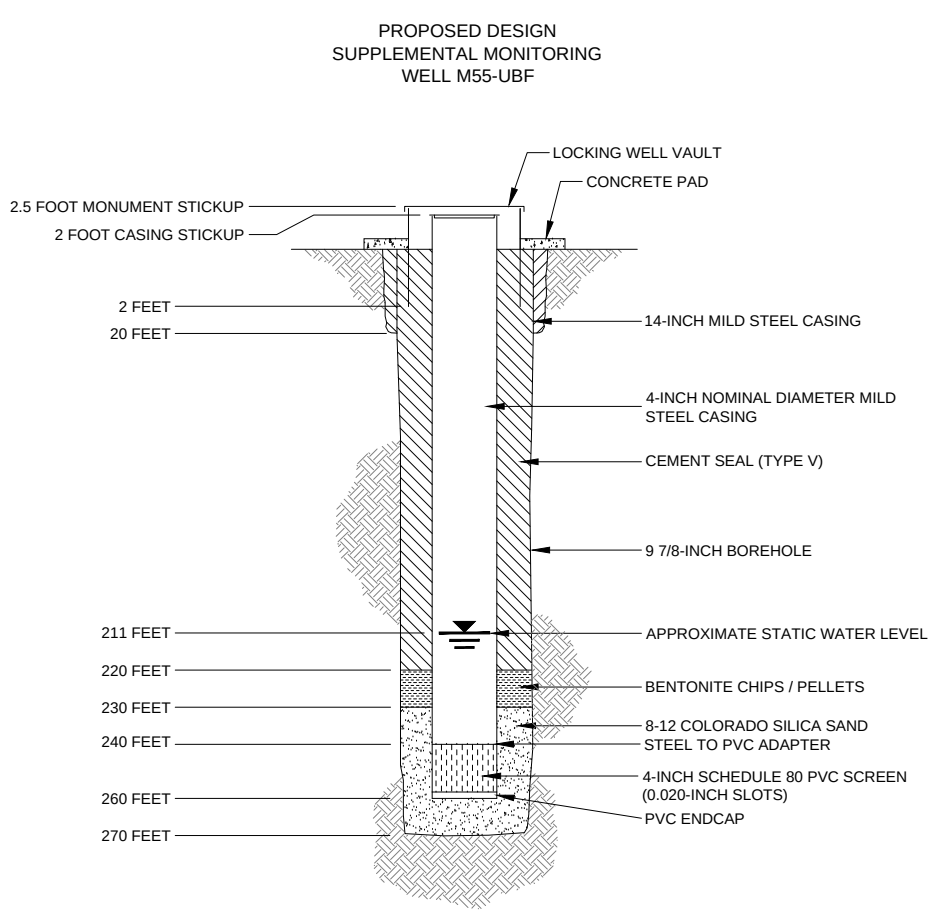
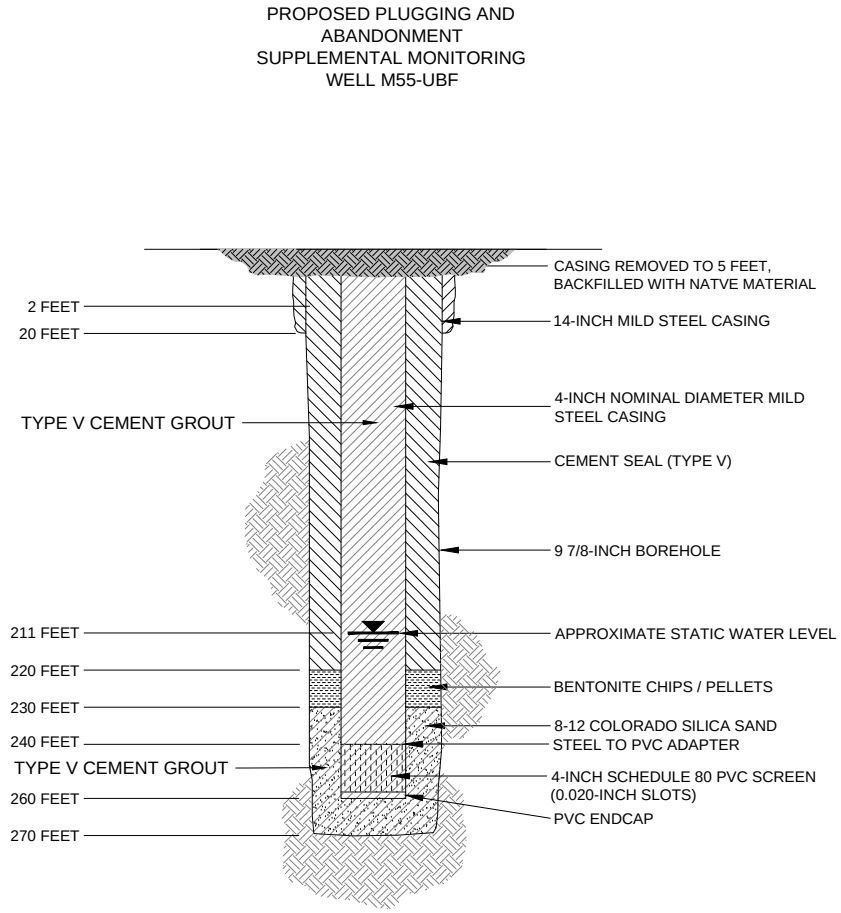
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\M55_M56_WELLDESIGN.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-M55





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

PROPOSED SUPPLEMENTAL MONITORING WELL M55-UBF ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

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Name and Address of Owner/Operator
Florence Copper
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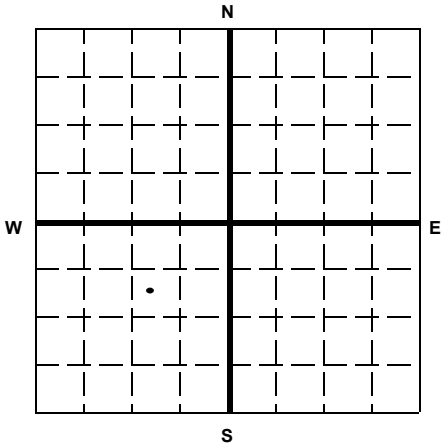
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
nw 1/4 of sw 1/4 of NE 1/4 of sw 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 925 ft. frm (N/S) N Line of quarter section
and 1190 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number M56-LBF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14	36.71	20	20	20
4	8.9	320	320	9.86
4	2	20	20	9.86

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	9.86	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	300	340				
Sacks of Cement To Be Used (each plug)	18	77	23				
Slurry Volume To Be Pumped (cu. ft.)	22	98	30				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
320	340		

Estimated Cost to Plug Wells

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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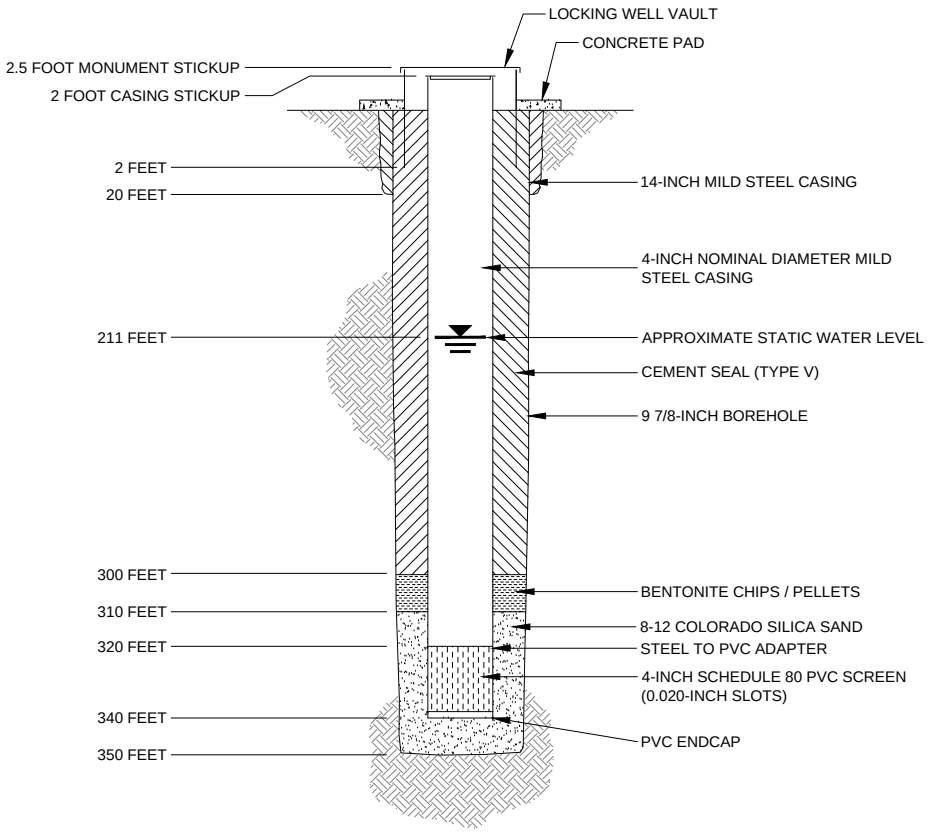
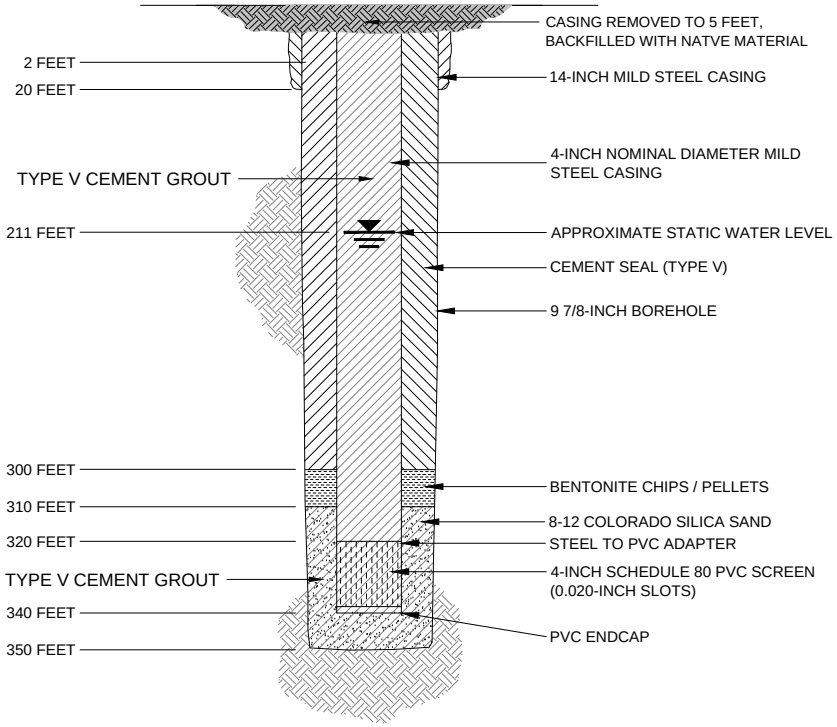
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\M55_M56_WELLDESIGN.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-M56

PROPOSED DESIGN
SUPPLEMENTAL MONITORING
WELL M56-LBF



PROPOSED PLUGGING AND
ABANDONMENT
SUPPLEMENTAL MONITORING
WELL M56-LBF



NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

PROPOSED SUPPLEMENTAL
MONITORING WELL M56-LBF
ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

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Washington, DC 20460

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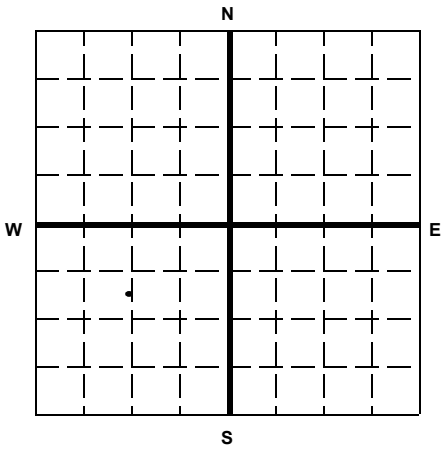
Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SE 1/4 of nw 1/4 of sw 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 960 ft. frm (N/S) N Line of quarter section
and 1265 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number M57-O

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14	36.71	20	20	20
4	8.9	525	525	9.86
4	2	675	675	9.86

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	9.86	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	505	1200				
Sacks of Cement To Be Used (each plug)	18	176	82				
Slurry Volume To Be Pumped (cu. ft.)	22	224	105				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
525	1200		

Estimated Cost to Plug Wells
$220,000

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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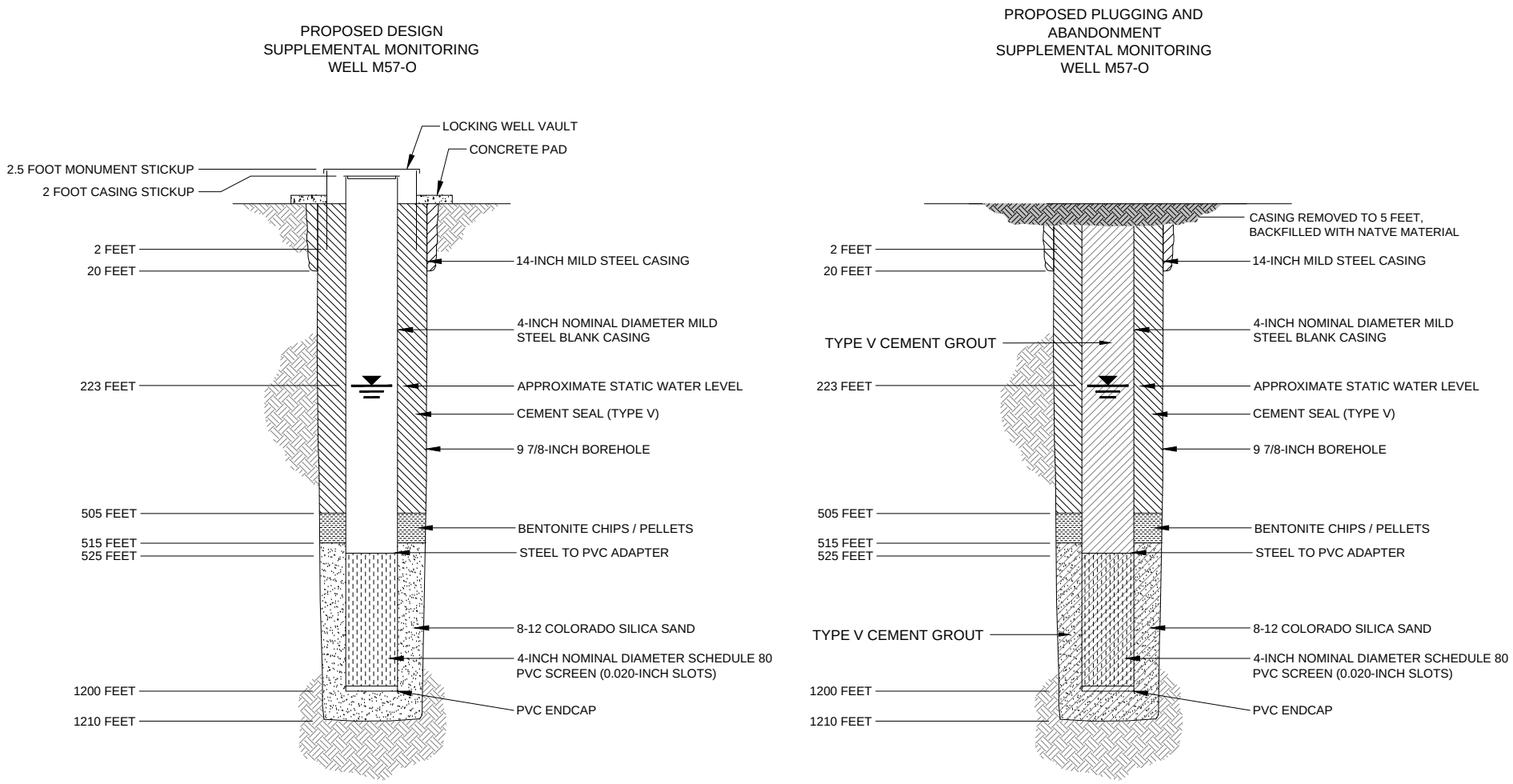
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\M57WELLDESIGN.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-M57



NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

PROPOSED SUPPLEMENTAL MONITORING WELL M57-O ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

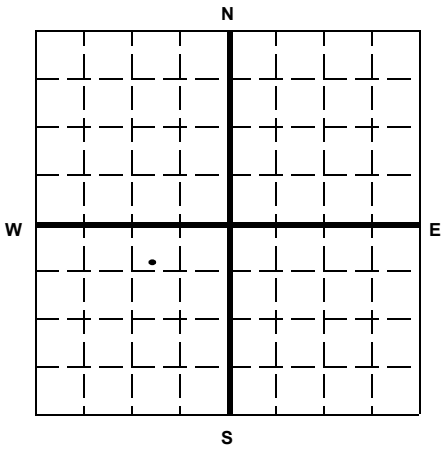
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
sw 1/4 of nw 1/4 of NE 1/4 of sw 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 620 ft. frm (N/S) N Line of quarter section
and 1070 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number M58-O

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	36.71	20	20	20"
4"	8.9	595	595	9.86"
4"	2	605	605	9.86"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	9.86	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	575	1200				
Sacks of Cement To Be Used (each plug)	18	200	82				
Slurry Volume To Be Pumped (cu. ft.)	22	255	105				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
595	1200		

Estimated Cost to Plug Wells
$220,000

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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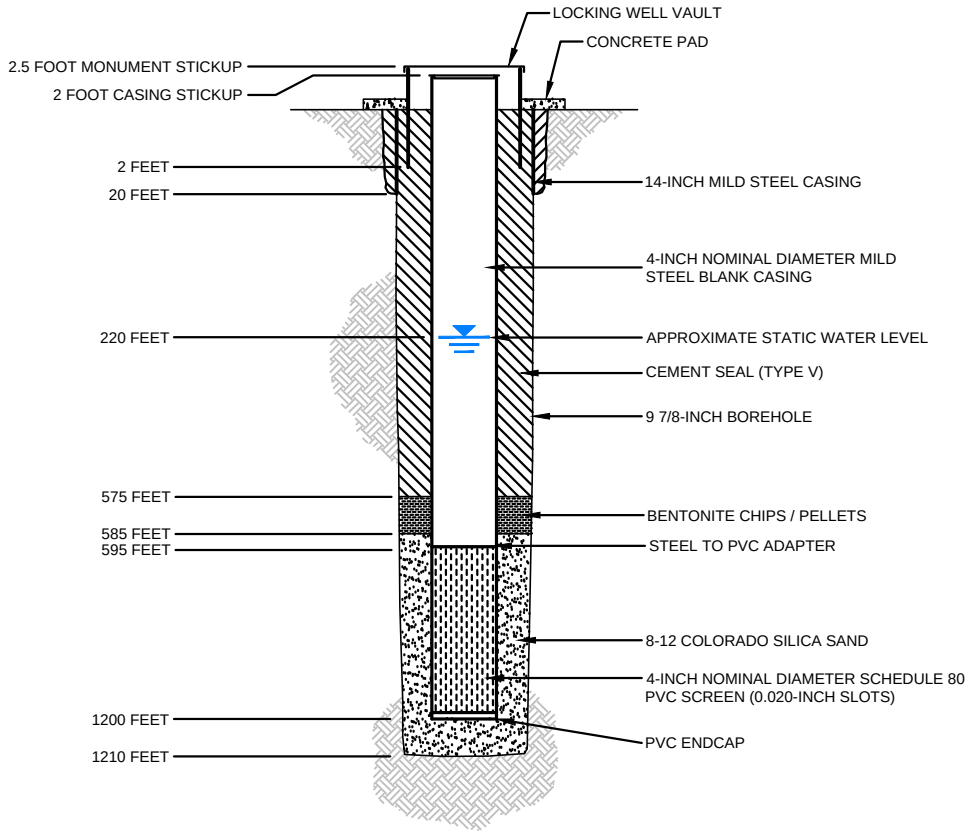
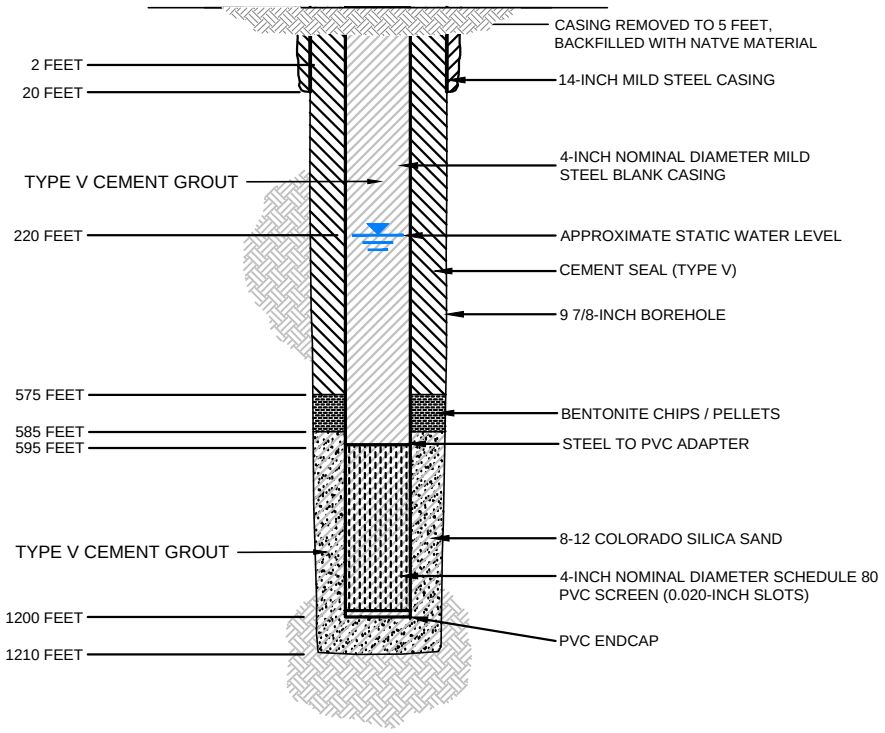
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\M58WELLDESIGN.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-M58

PROPOSED DESIGN
SUPPLEMENTAL MONITORING
WELL M58-O



PROPOSED PLUGGING AND
ABANDONMENT
SUPPLEMENTAL MONITORING
WELL M58-O



NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

PROPOSED SUPPLEMENTAL MONITORING WELL M58-O ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

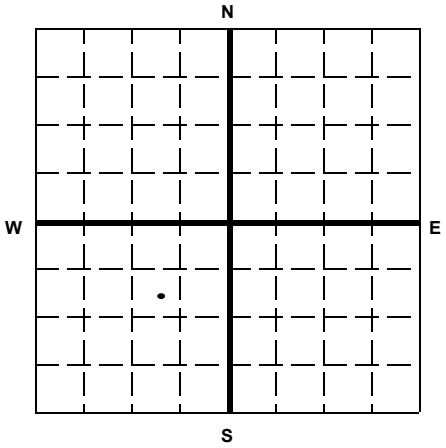
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SE 1/4 of sw 1/4 of NE 1/4 of sw 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 985 ft. frm (N/S) N Line of quarter section
and 840 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number M59-O

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14	36.71	20	20	20
4	8.9	535	535	9.86
4	2	665	665	9.86

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	9.86	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	515	1200				
Sacks of Cement To Be Used (each plug)	18	179	82				
Slurry Volume To Be Pumped (cu. ft.)	22	228	105				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
535	1200		

Estimated Cost to Plug Wells
$220,000

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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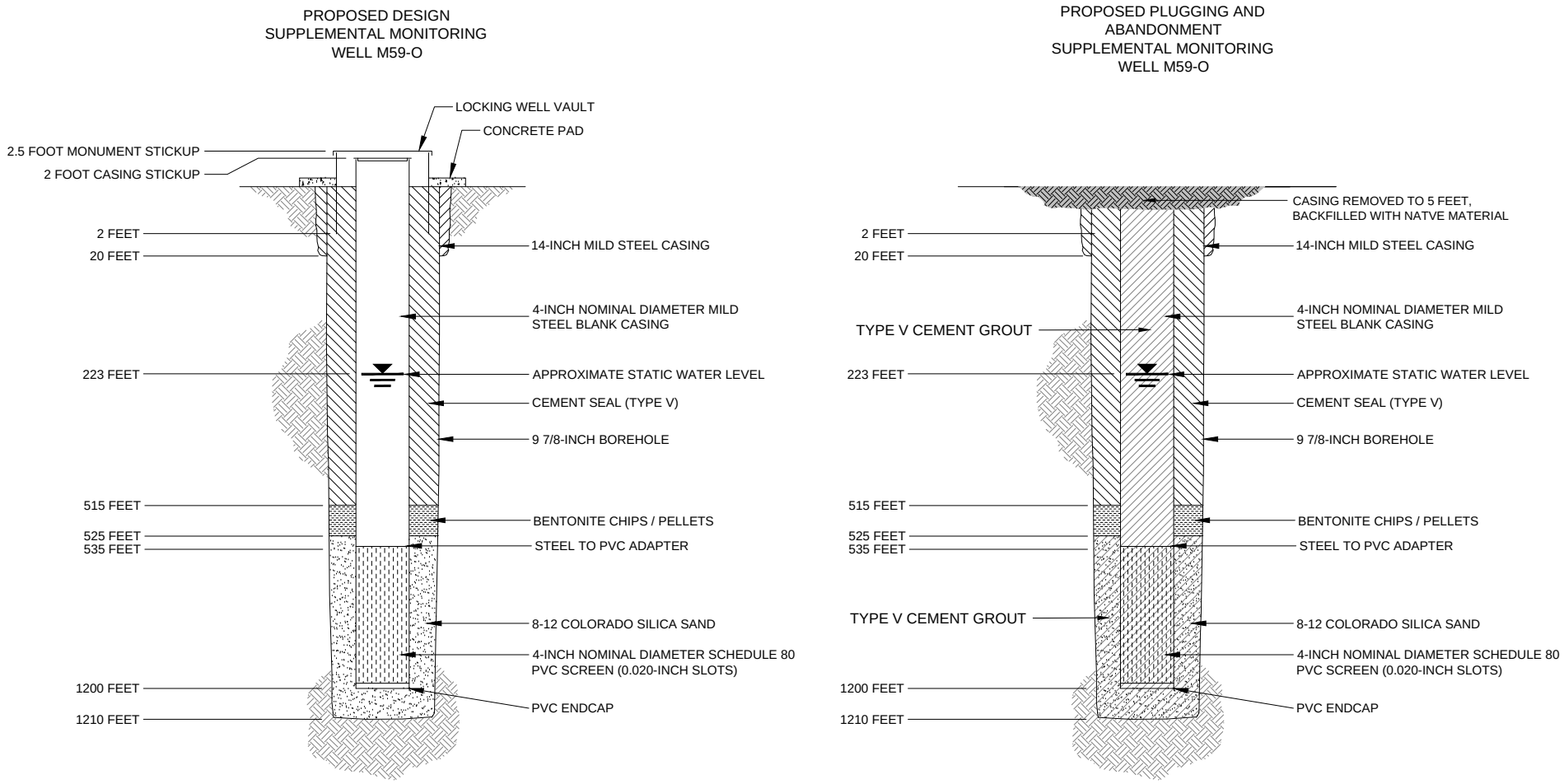
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\M59WELLDESIGN.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-M59



NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

PROPOSED SUPPLEMENTAL MONITORING WELL M59-O ABANDONMENT DIAGRAM

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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Florence Copper Project
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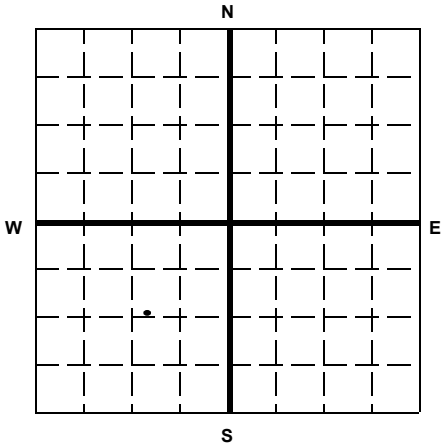
Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1280 ft. frm (N/S) N Line of quarter section
and 1140 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number M60-O

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	36.71	20	20	20"
4"	8.9	445	445	9.86"
4"	2	755	755	9.86"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	9.86	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	425	1200				
Sacks of Cement To Be Used (each plug)	18	148	82				
Slurry Volume To Be Pumped (cu. ft.)	22	188	105				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
445	1200		

Estimated Cost to Plug Wells

Certification

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OMB No. 2040-0042 Approval Expires 11/30/2014

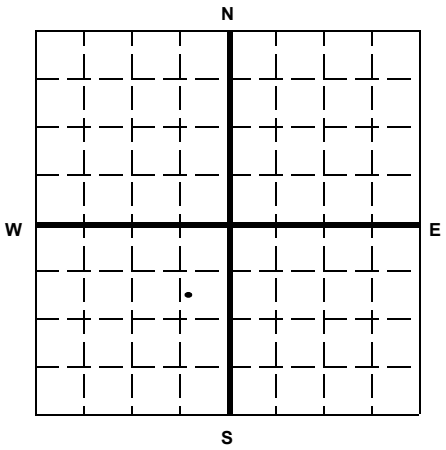
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
sw 1/4 of SE 1/4 of NE 1/4 of sw 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1060 ft. frm (N/S) N Line of quarter section
and 555 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number M61-LBF

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14	36.71	20	20	20
4	8.9	435	435	9.86
4	2	200	200	9.86

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	9.86	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	415	635				
Sacks of Cement To Be Used (each plug)	18	144	44				
Slurry Volume To Be Pumped (cu. ft.)	22	184	55				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
435	635		

Estimated Cost to Plug Wells

Certification

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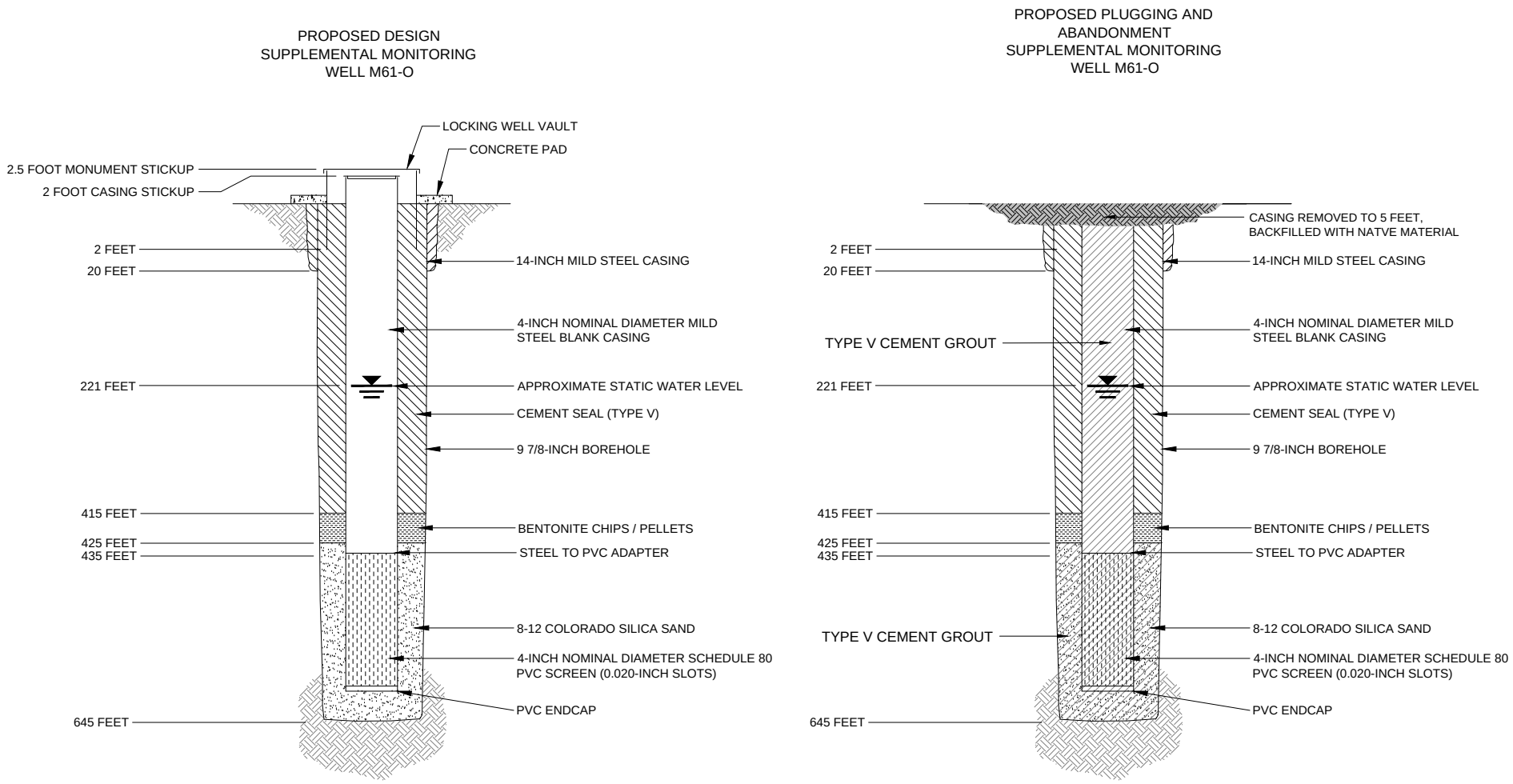
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\M61WELLDESIGN.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-M61



NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

PROPOSED SUPPLEMENTAL MONITORING WELL M61-O ABANDONMENT DIAGRAM

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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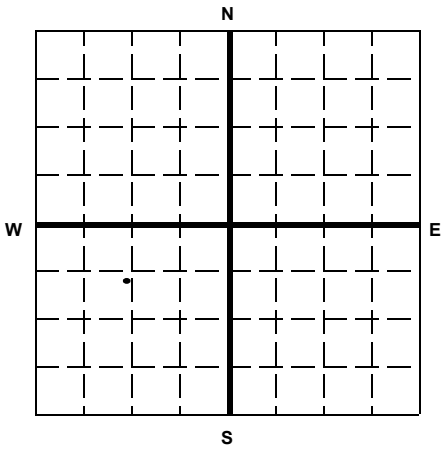
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SE 1/4 of NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 730 ft. frm (N/S) N Line of quarter section
and 1300 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number MW-01

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
4	2.782	1800	1800	16

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	16	4	4				
Depth to Bottom of Tubing or Drill Pipe (ft	1200	300	300				
Sacks of Cement To Be Used (each plug)	987	21	21				
Slurry Volume To Be Pumped (cu. ft.)	1257	26	26				
Calculated Top of Plug (ft.)	300	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	Type V	Type V	Type V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
320	600		
620	1200		

Estimated Cost to Plug Wells
$12,000

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
		08/06/2014

Paperwork Reduction Act Notice

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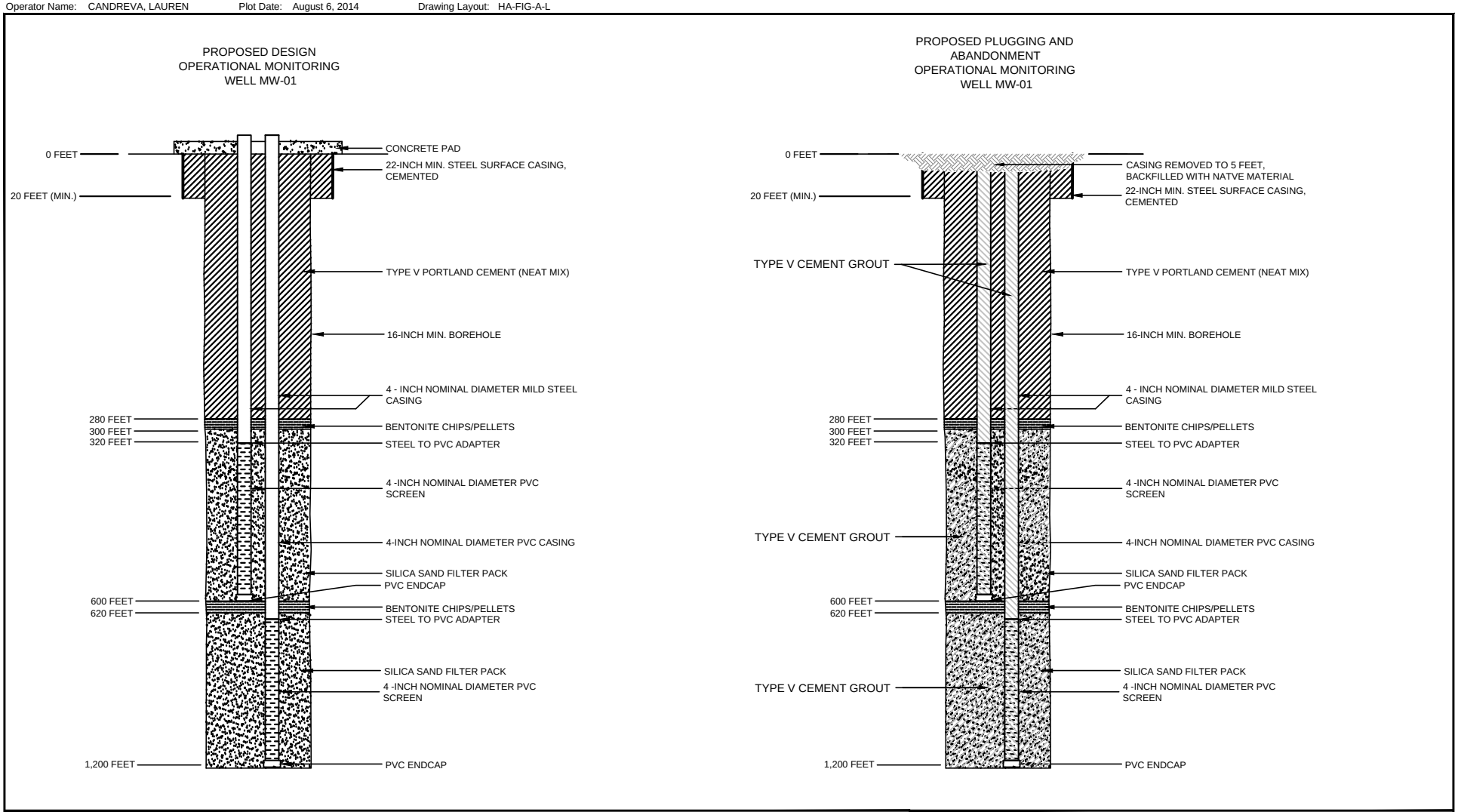
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\MW-01_WELLDIAGRAM.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L



NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

PROPOSED OPERATIONAL MONITORING WELL MW-01 ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

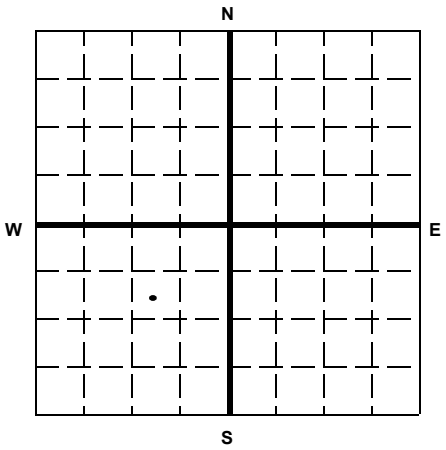
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1010 ft. frm (N/S) N Line of quarter section
and 1040 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number O-01

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	27.66	20	20	20"
2.5"	5.61	510	510	10"
2.5"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	2.5				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	22	197	32				
Slurry Volume To Be Pumped (cu. ft.)	18	251	41				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	1200		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonment costs

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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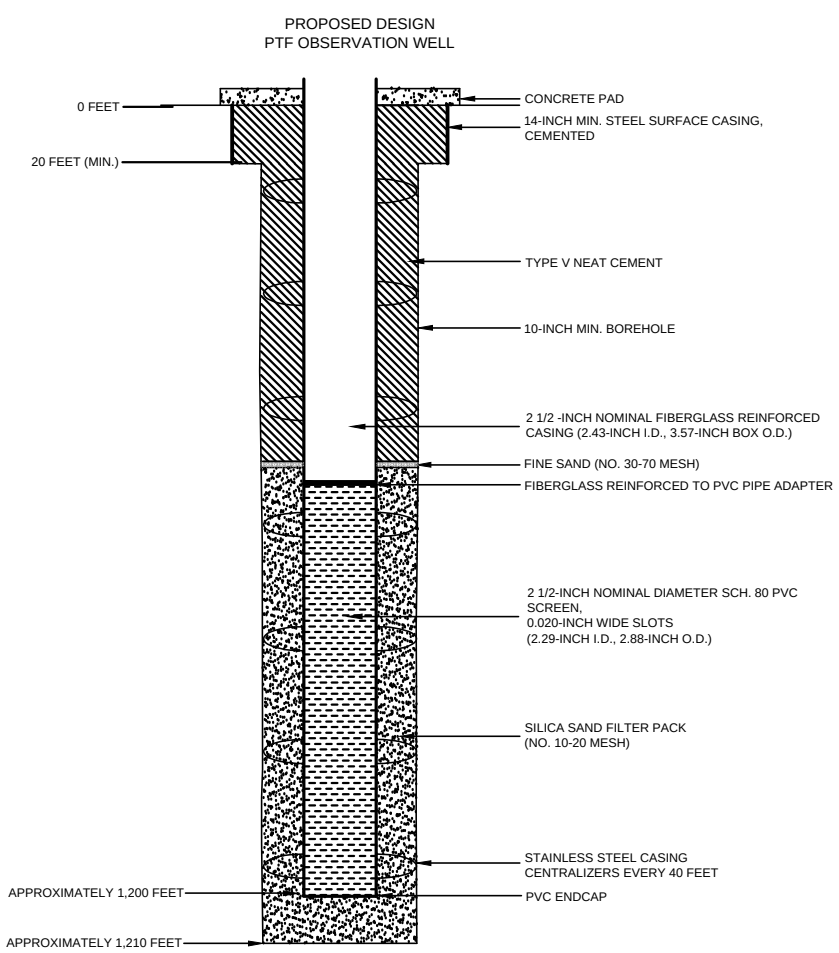
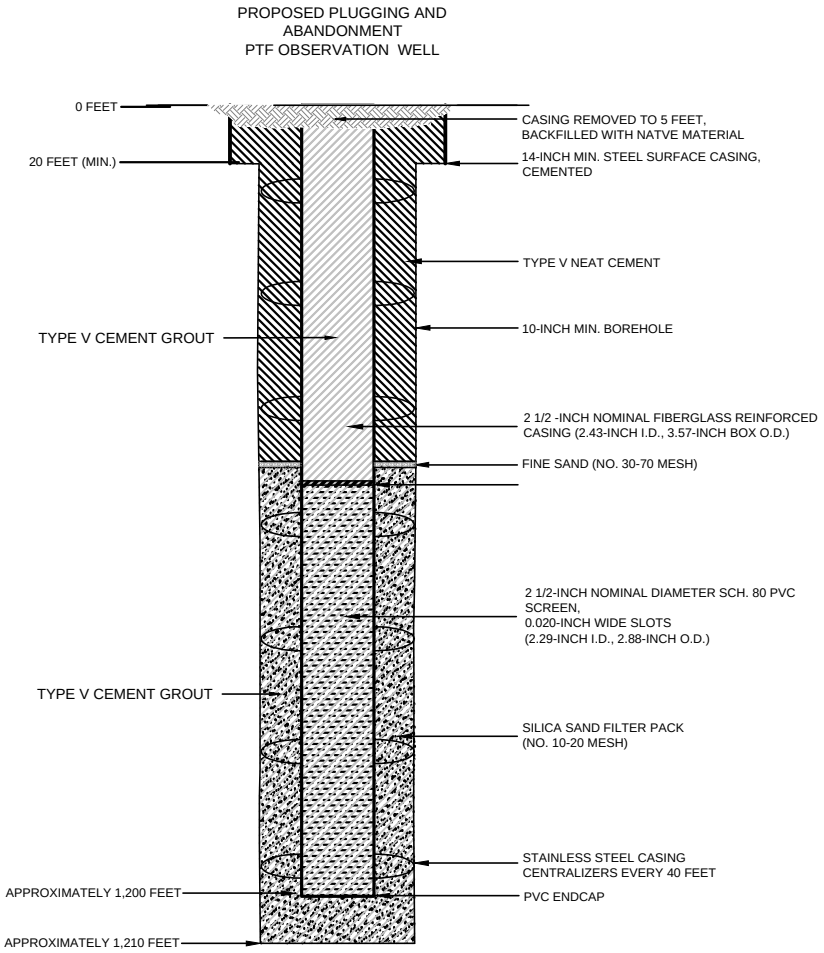
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-OBSERVATION_WELL_CONSTRUCTION DIAGRAM.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L





NOTES

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HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TEST FACILITY PROPOSED OBSERVATION WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

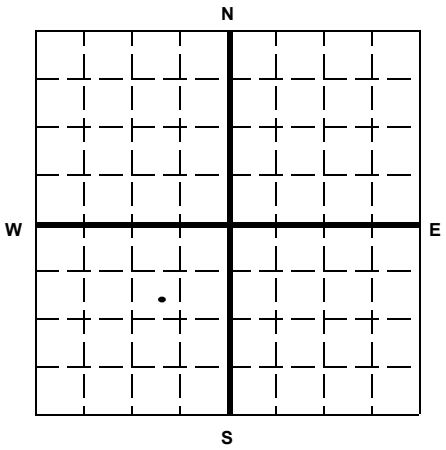
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1010 ft. frm (N/S) N Line of quarter section
and 900 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number O-02

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	27.66	20	20	20"
2.5"	5.61	510	510	10"
2.5"	3	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	2.5				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	22	197	32				
Slurry Volume To Be Pumped (cu. ft.)	18	251	41				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	1200		

Estimated Cost to Plug Wells
$150,000- inlcudes construction and abandonment costs

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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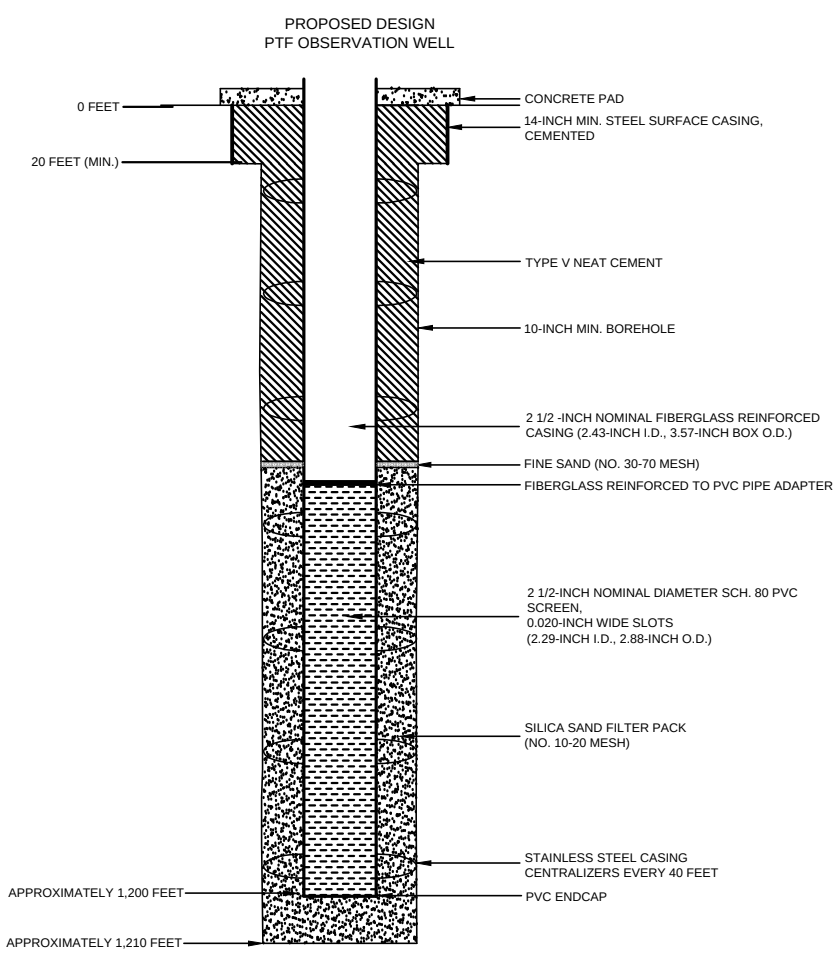
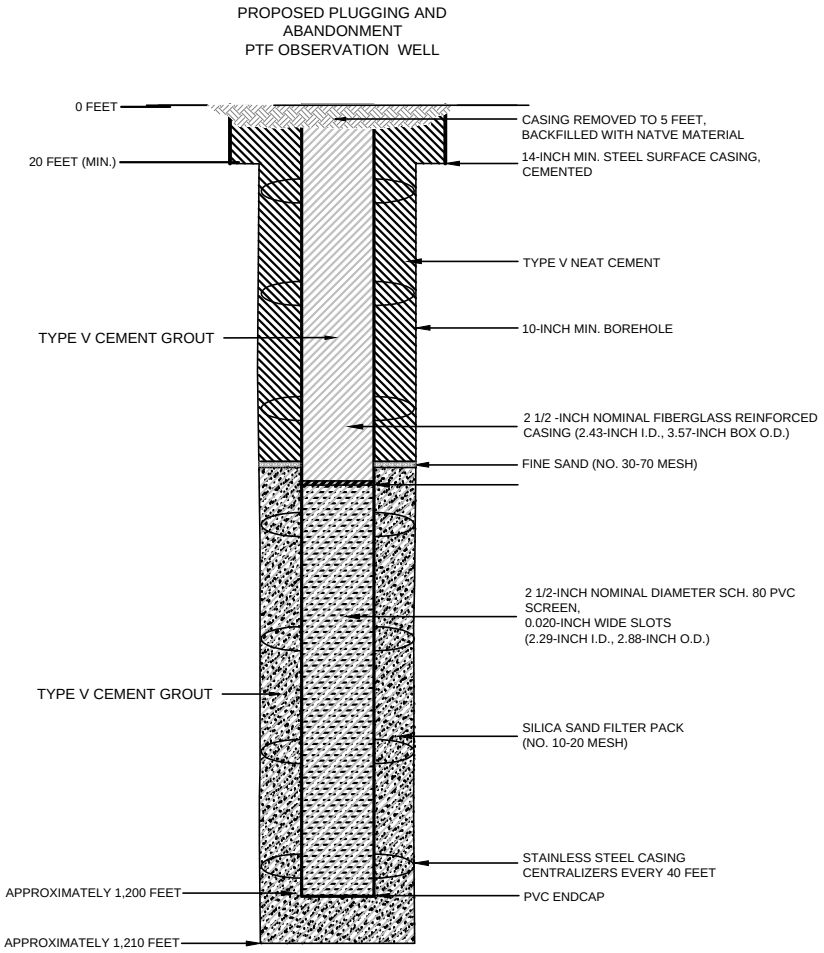
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TEST FACILITY PROPOSED OBSERVATION WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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Name and Address of Owner/Operator
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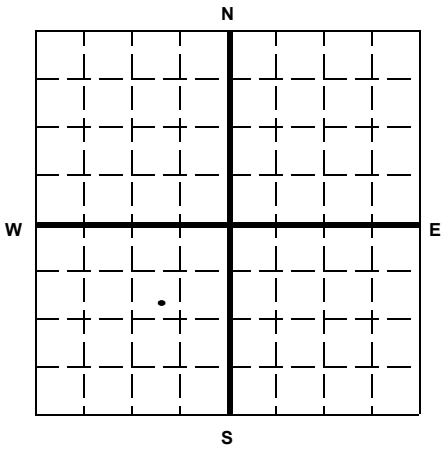
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1150 ft. frm (N/S) N Line of quarter section
and 900 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number O-03

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	27.66	20	20	20"
2.5"	5.61	510	510	10"
2.5"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	2.5				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	22	197	32				
Slurry Volume To Be Pumped (cu. ft.)	18	251	41				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	1200		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonment costs

Certification

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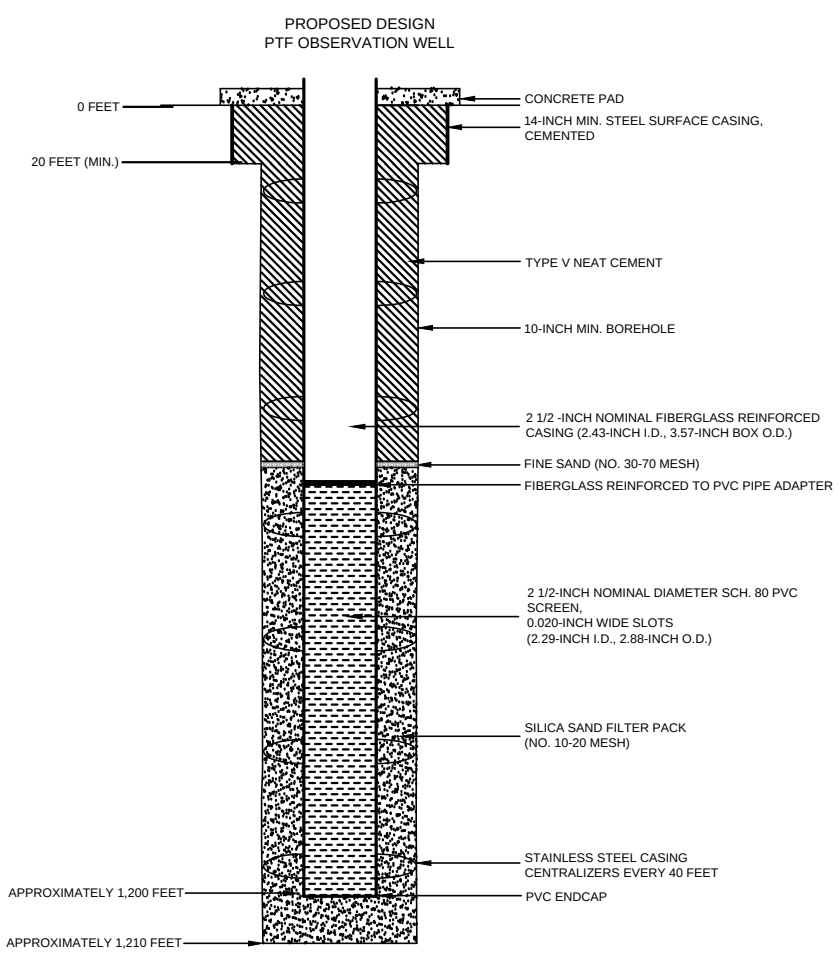
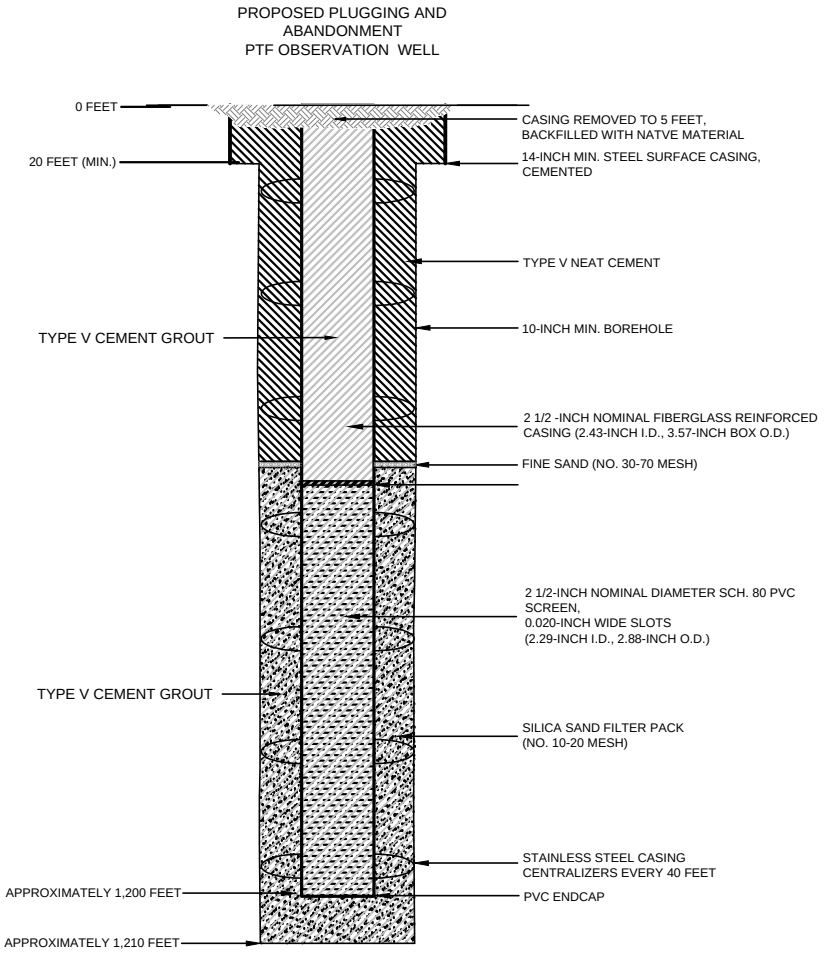
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-OBSERVATION_WELL_CONSTRUCTION DIAGRAM.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L





NOTES

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HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TEST FACILITY PROPOSED OBSERVATION WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

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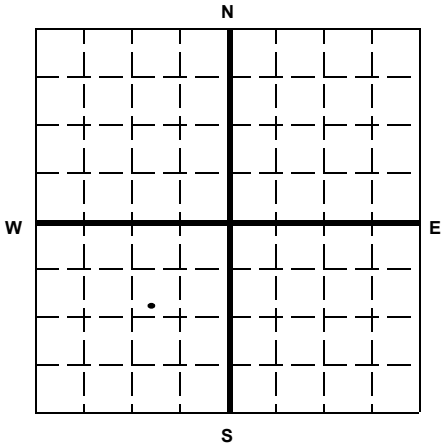

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1225 ft. frm (N/S) N Line of quarter section
and 1115 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number O-04

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	27.66	20	20	20"
2.5"	5.61	510	510	10"
2.5"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
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- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	2.5				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	22	197	32				
Slurry Volume To Be Pumped (cu. ft.)	18	251	41				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	1200		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonment costs

Certification

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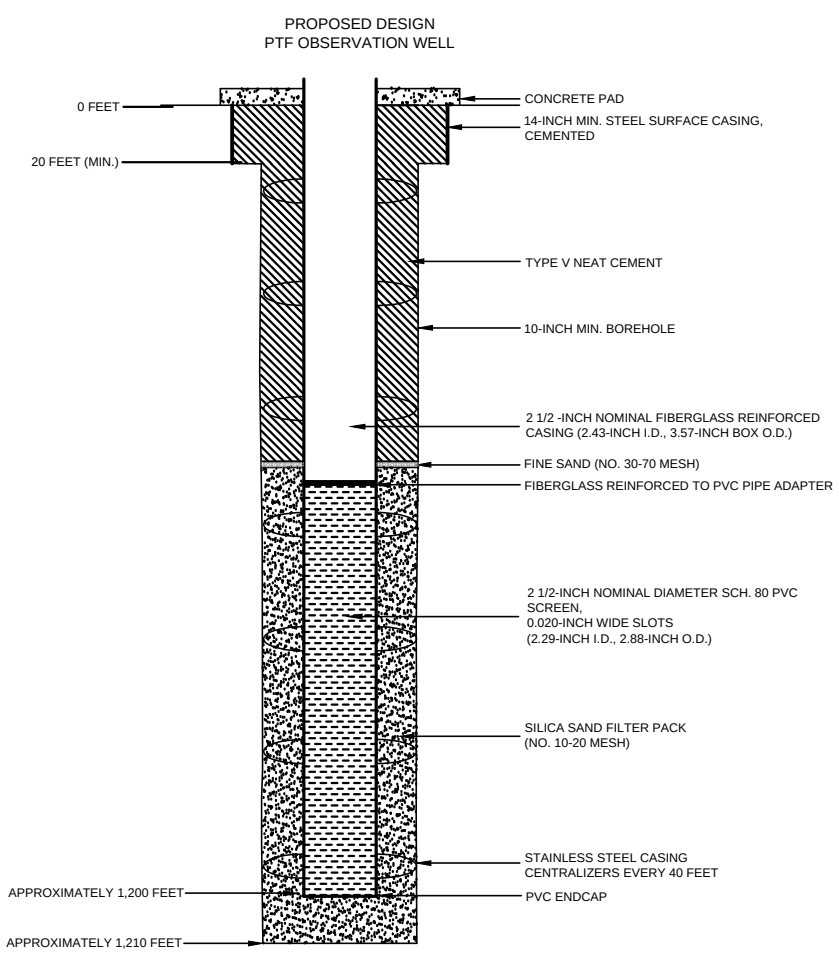
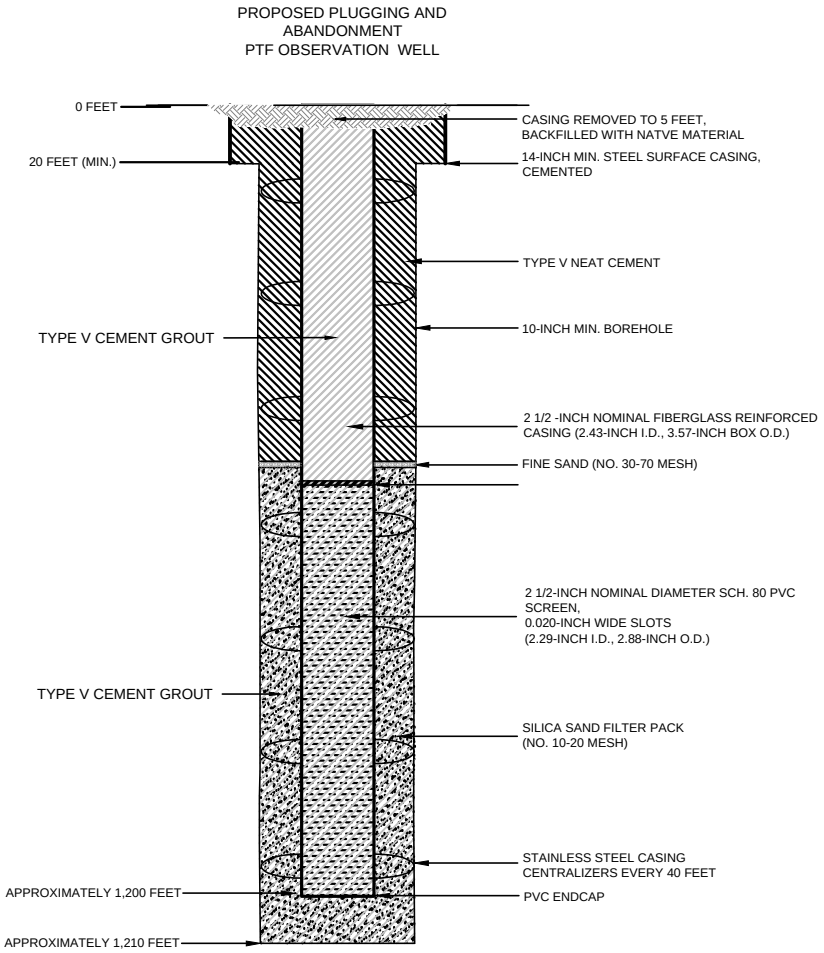
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L





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1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TEST FACILITY PROPOSED OBSERVATION WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

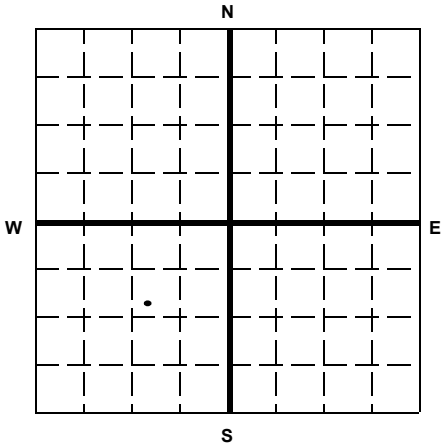
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1155 ft. frm (N/S) N Line of quarter section
and 1180 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number O-05

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	27.66	20	20	20"
2.5"	5.61	510	510	10"
2.5"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	2.5				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	22	197	32				
Slurry Volume To Be Pumped (cu. ft.)	18	251	41				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	1200		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonment costs

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

The public reporting and record keeping burden for this collection of information is estimated to average 4.5 hours for operators of Class I hazardous wells, 1.5 hours for operators of Class I non-hazardous wells, 3 hours for operators of Class II wells, and 1.5 hours for operators of Class III wells.
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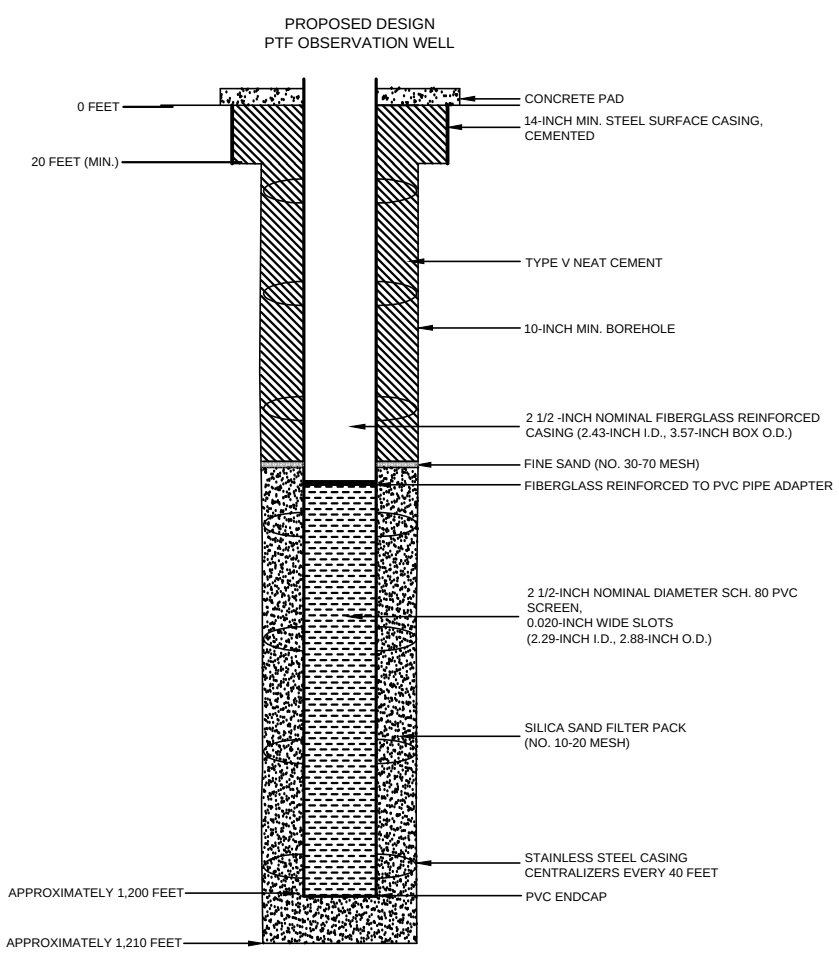
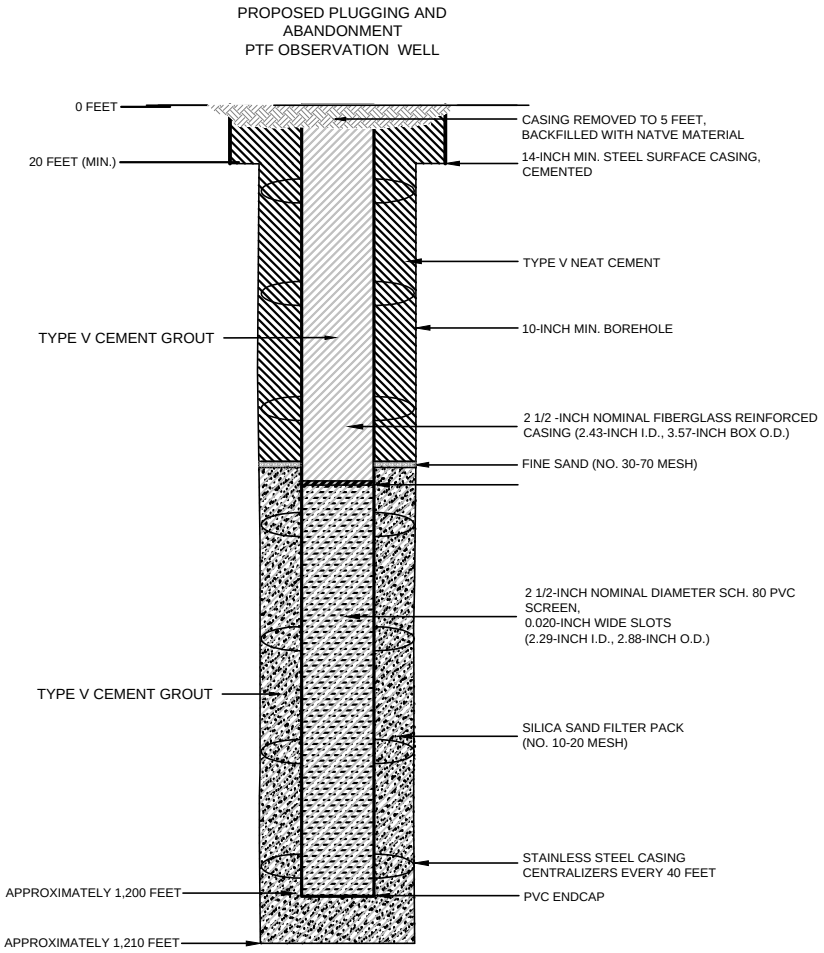
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-OBSERVATION_WELL_CONSTRUCTION DIAGRAM.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TEST FACILITY PROPOSED OBSERVATION WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

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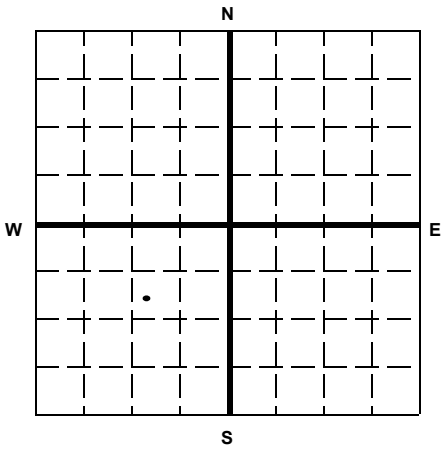
Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1010 ft. frm (N/S) N Line of quarter section
and 1180 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number O-06

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	27.66	20	20	20"
2.5"	5.61	510	510	10"
2.5"	3	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	2.5				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	22	197	32				
Slurry Volume To Be Pumped (cu. ft.)	18	251	41				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	1200		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonment costs

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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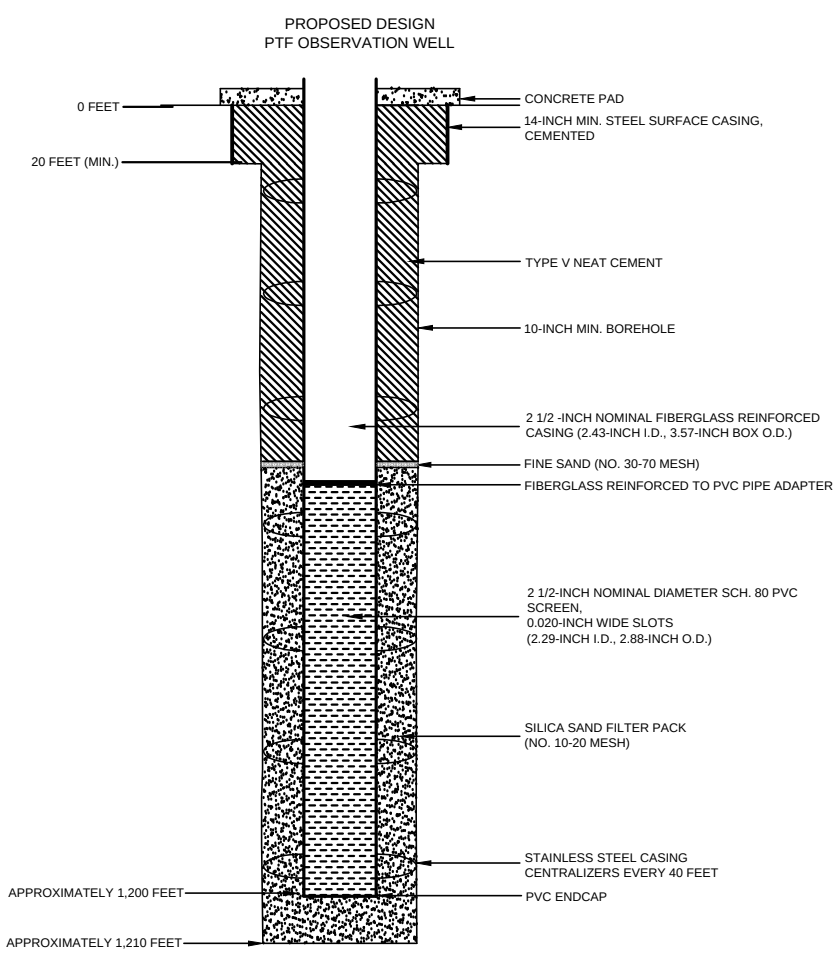
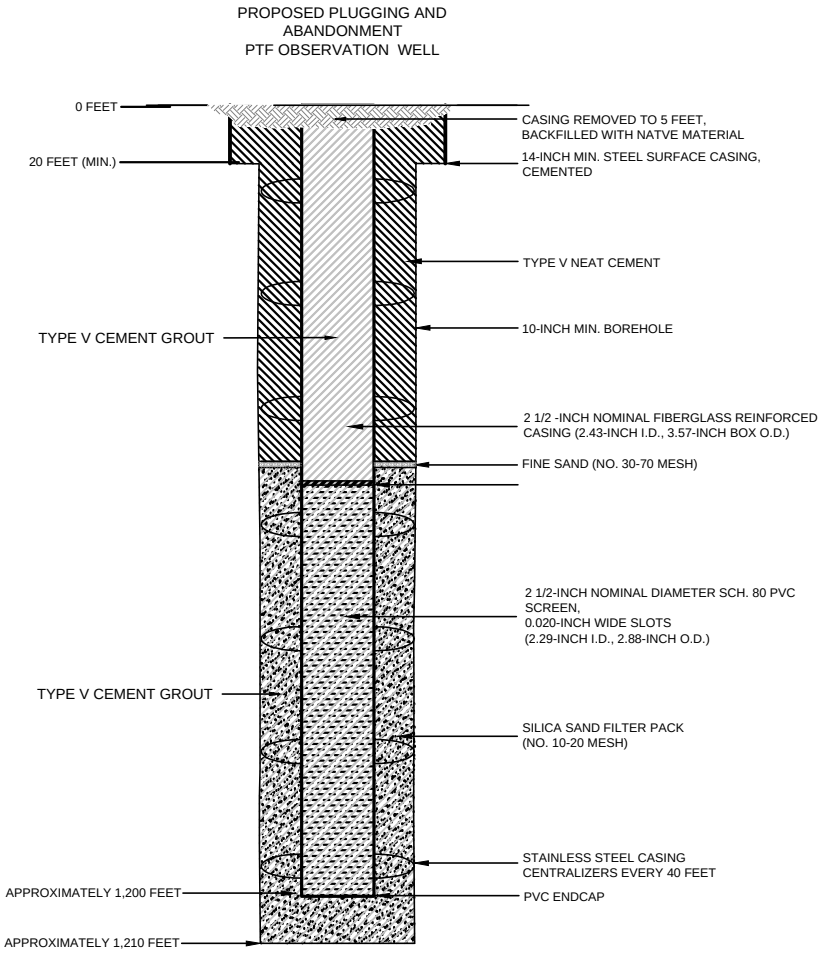
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-OBSERVATION_WELL_CONSTRUCTION DIAGRAM.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TEST FACILITY PROPOSED OBSERVATION WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

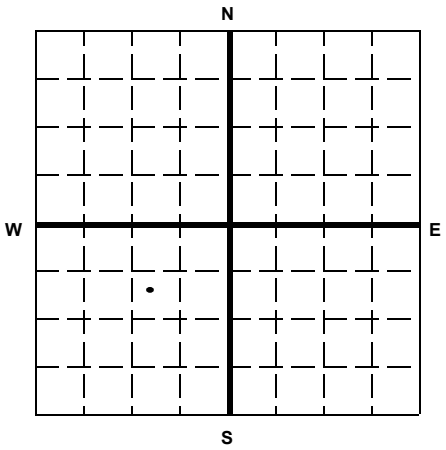
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 940 ft. frm (N/S) N Line of quarter section
and 1120 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number O-07

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
14"	27.66	20	20	20"
2.5"	5.61	510	510	10"
2.5"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	2.5				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	22	197	32				
Slurry Volume To Be Pumped (cu. ft.)	18	251	41				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	1200		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonment costs

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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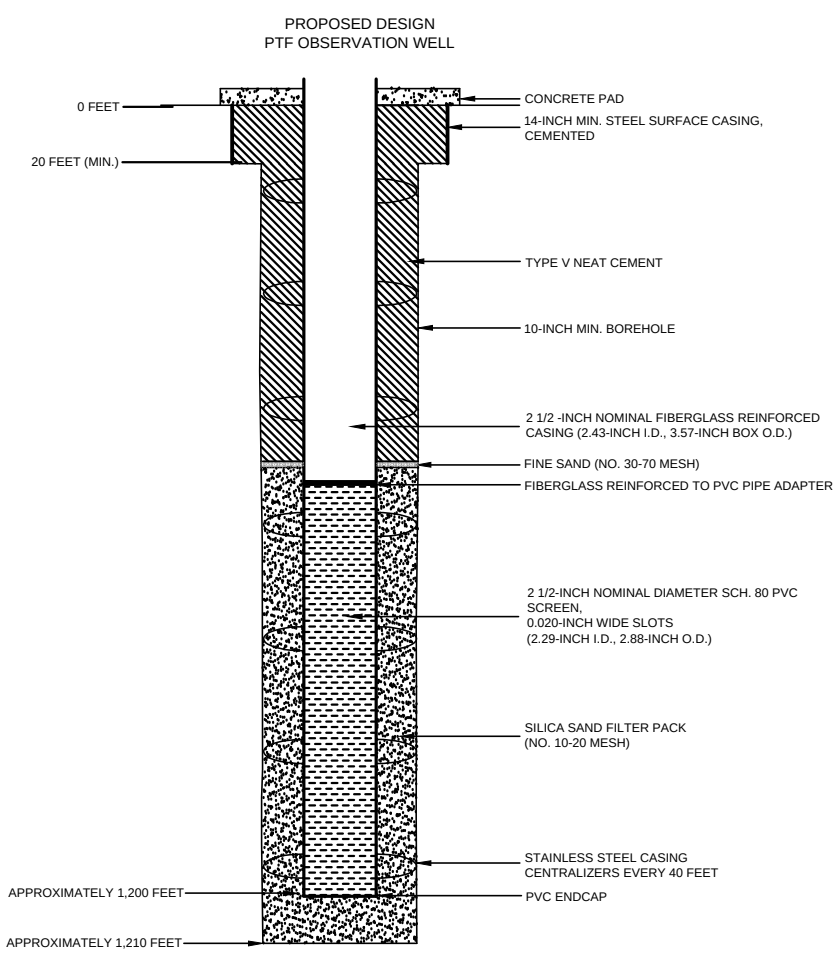
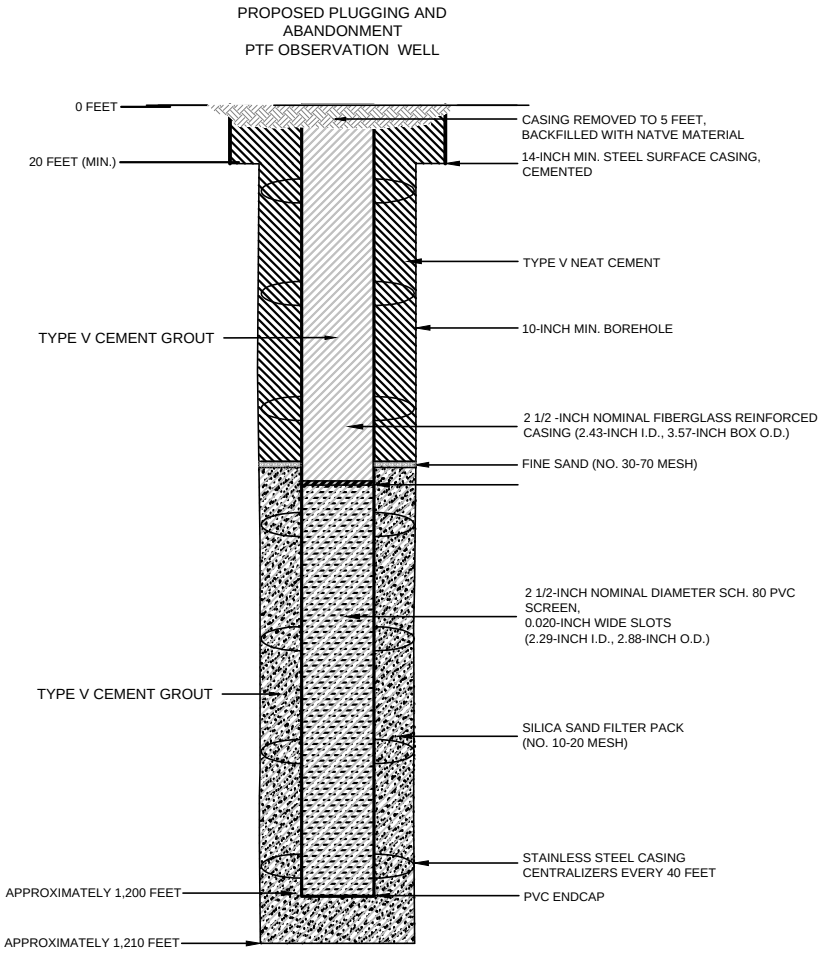
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TEST FACILITY PROPOSED OBSERVATION WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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Florence Copper Project
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Name and Address of Owner/Operator
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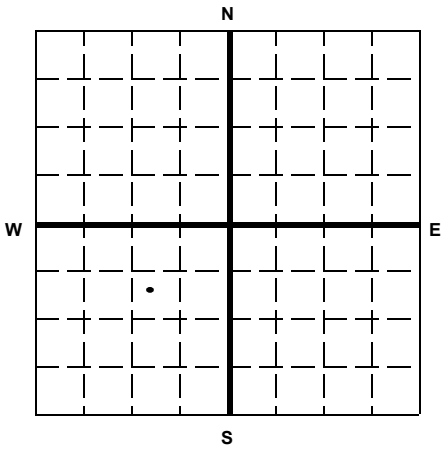
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
NW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 940 ft. frm (N/S) N Line of quarter section
and 1050 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- ☐ Individual Permit
- ☑ Area Permit
- ☐ Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- ☐ CLASS I
- ☐ CLASS II
  - ☐ Brine Disposal
  - ☐ Enhanced Recovery
  - ☐ Hydrocarbon Storage
- ☑ CLASS III

Well Number R-01

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- ☑ The Balance Method
- ☐ The Dump Bailer Method
- ☐ The Two-Plug Method
- ☑ Other- 20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4 [1]	PLUG #5 [1]	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

EPA Form 7520-14 (Rev. 12-11)

[1] Intermediate plugs between screened intervals

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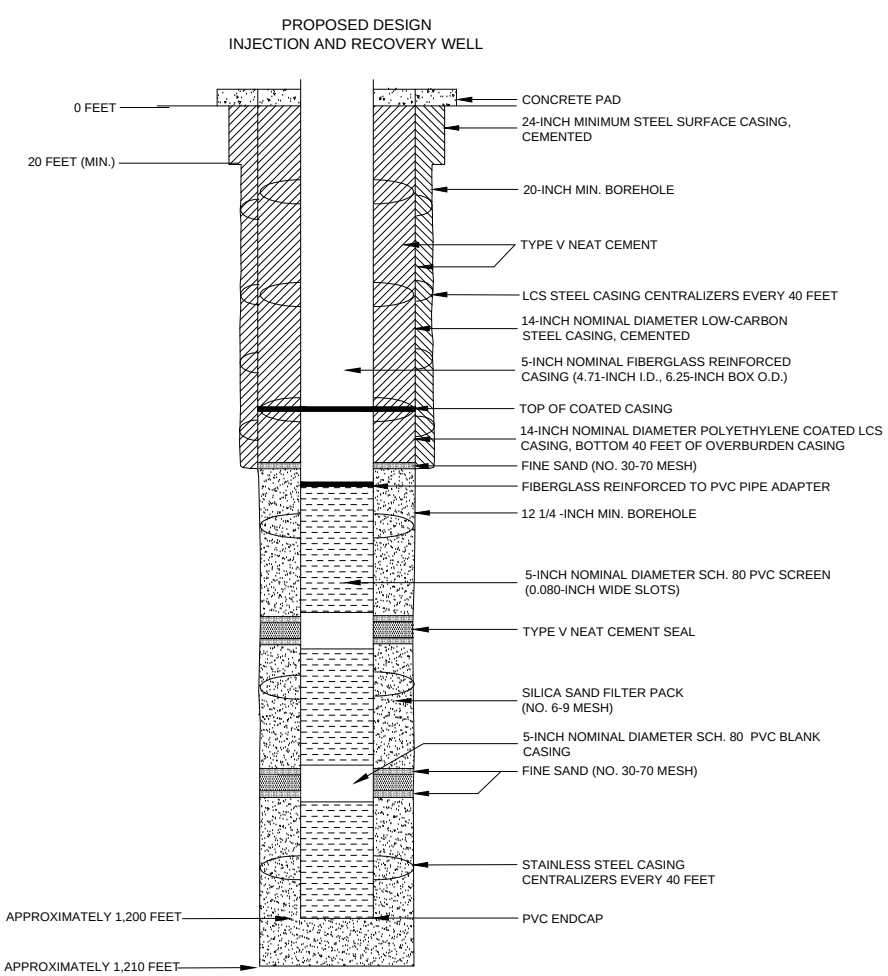
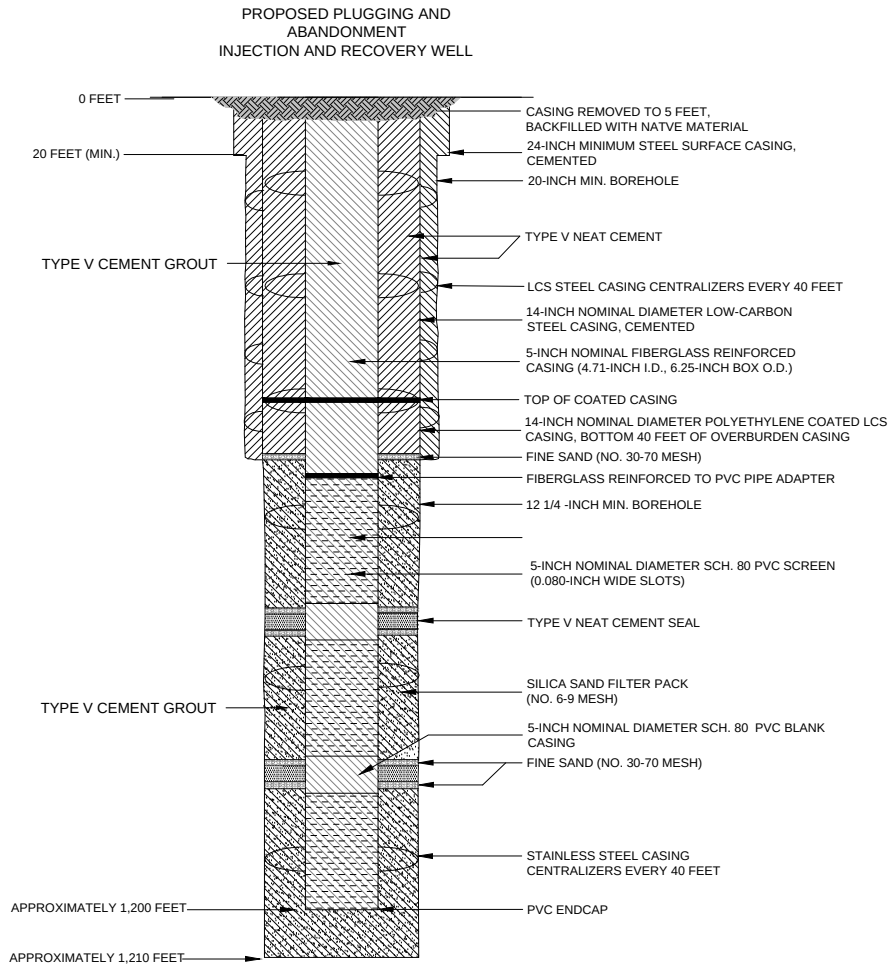
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-INJECTION_RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

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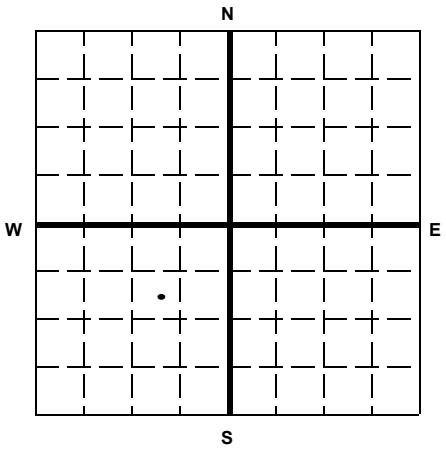

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1015 ft. frm (N/S) N Line of quarter section
and 980 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number R-02

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
28"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other -20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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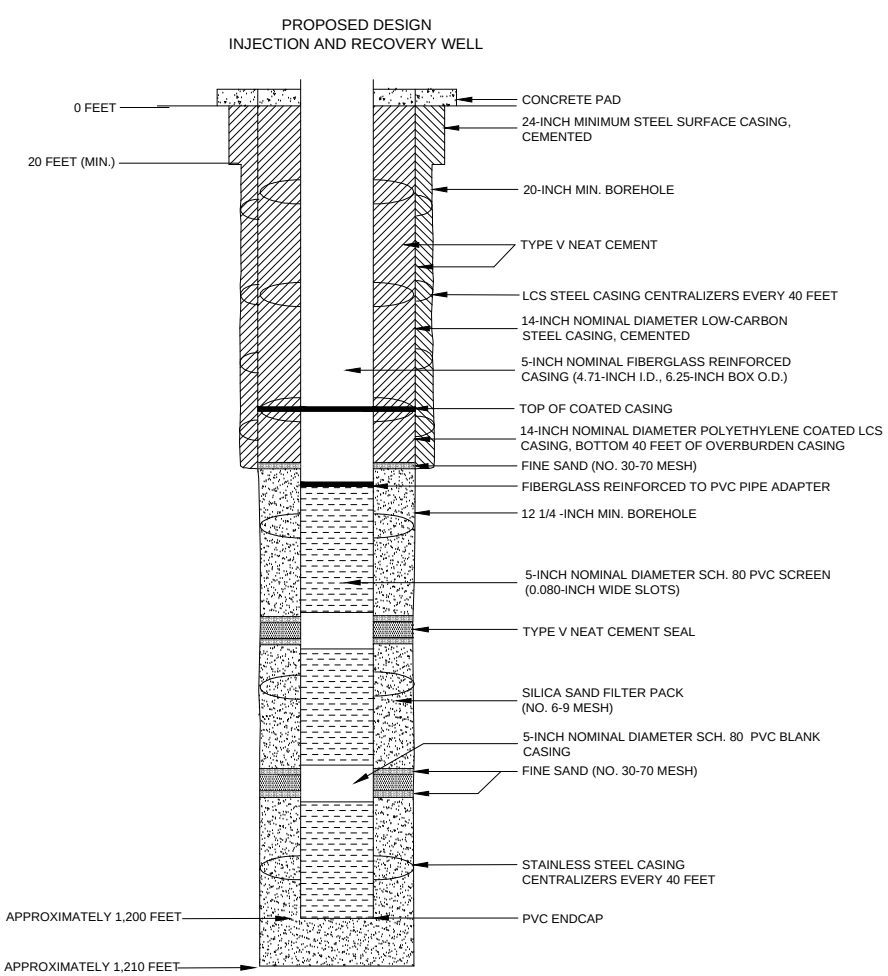
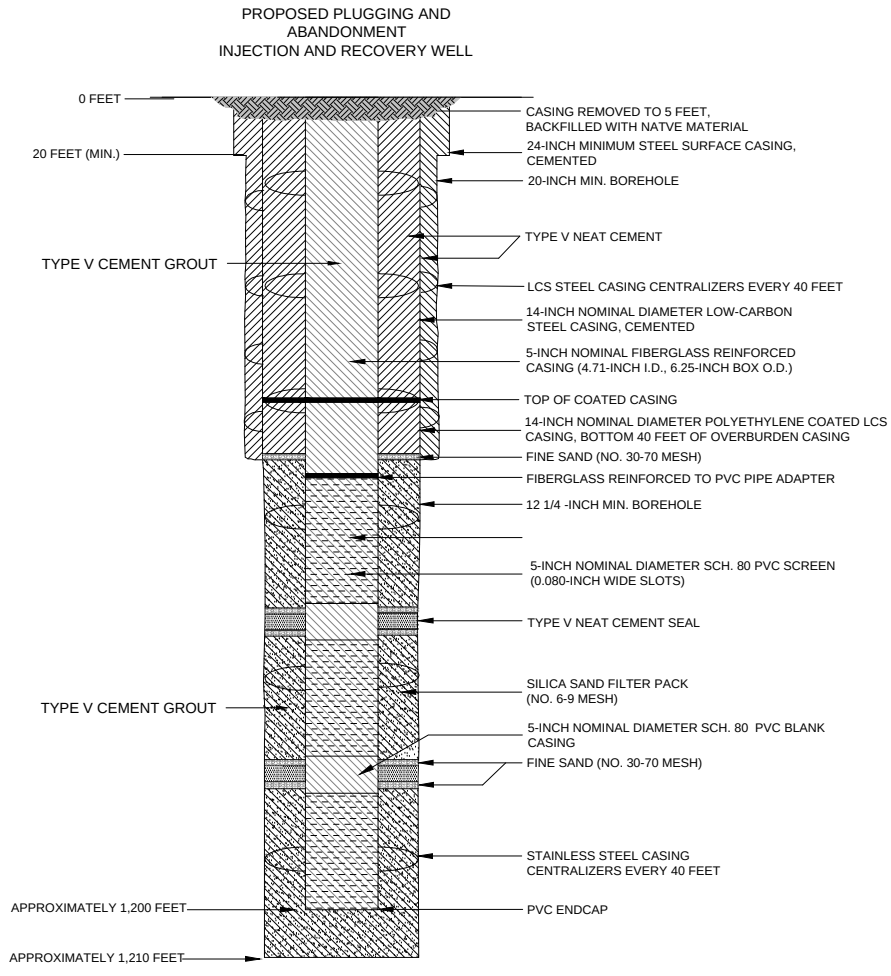
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-INJECTION_RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

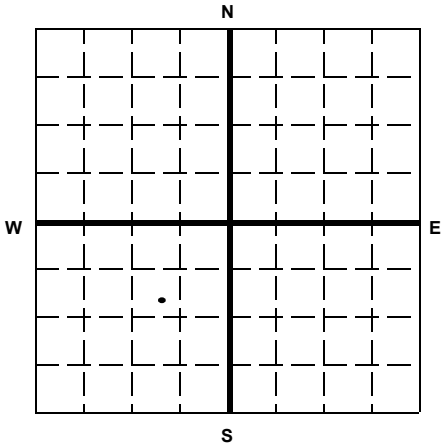
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SE 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1080 ft. frm (N/S) N Line of quarter section
and 900 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number R-03

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4 [1]	PLUG #5 [1]	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

EPA Form 7520-14 (Rev. 12-11)

[1] Intermediate plugs between screened intervals

Paperwork Reduction Act Notice

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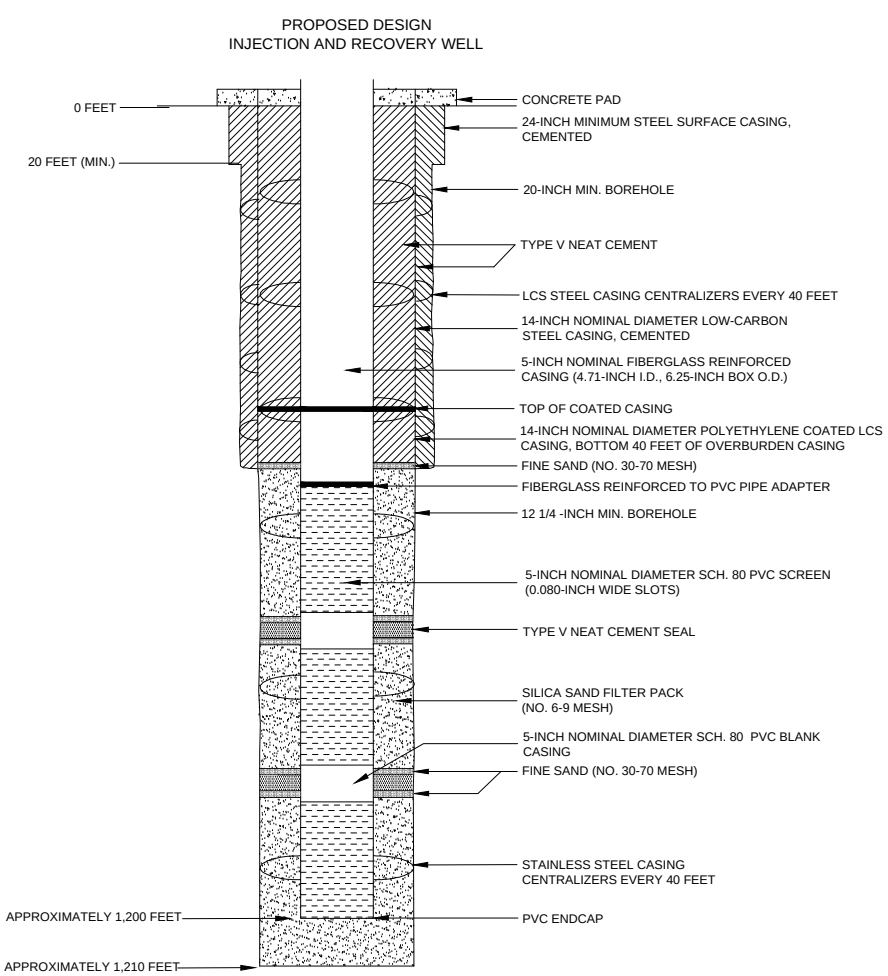
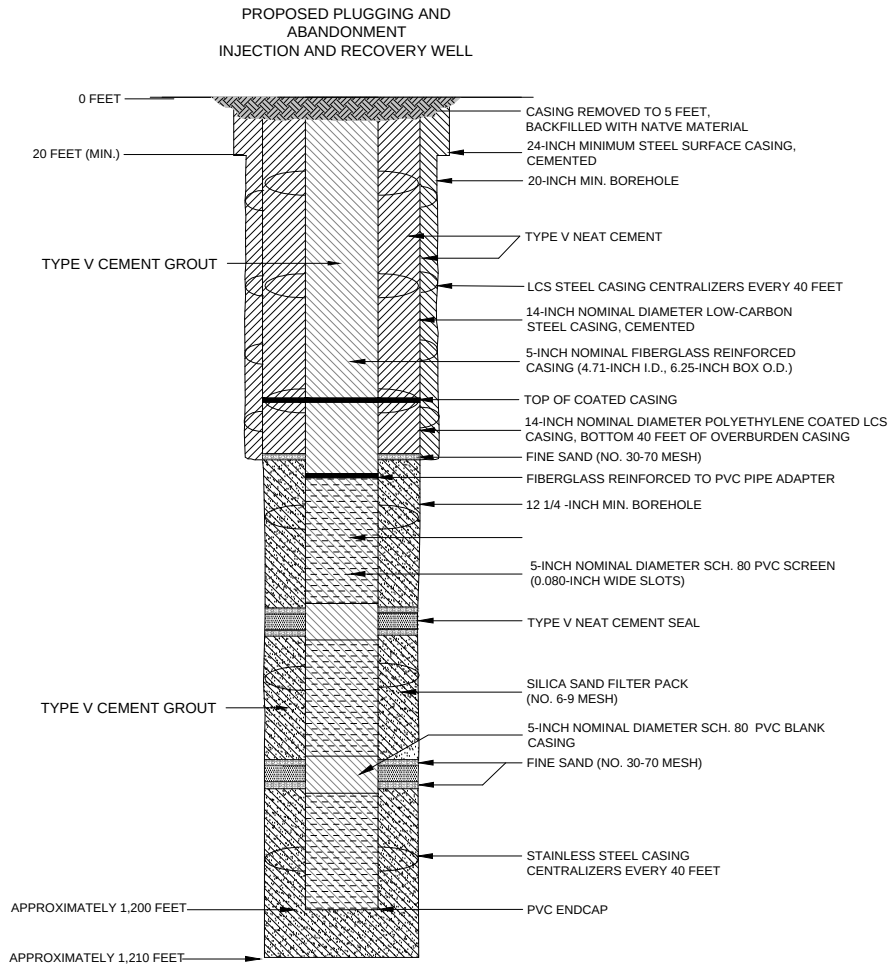
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-INJECTION_RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

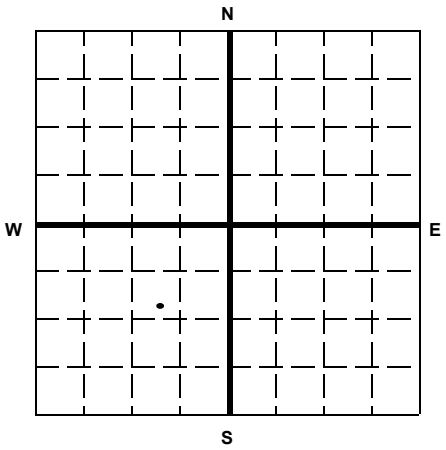
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SE 1/4 of sw 1/4 of NE 1/4 of sw 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1160 ft. frm (N/S) N Line of quarter section
and 975 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number R-04

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other- 20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.40			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonement costs

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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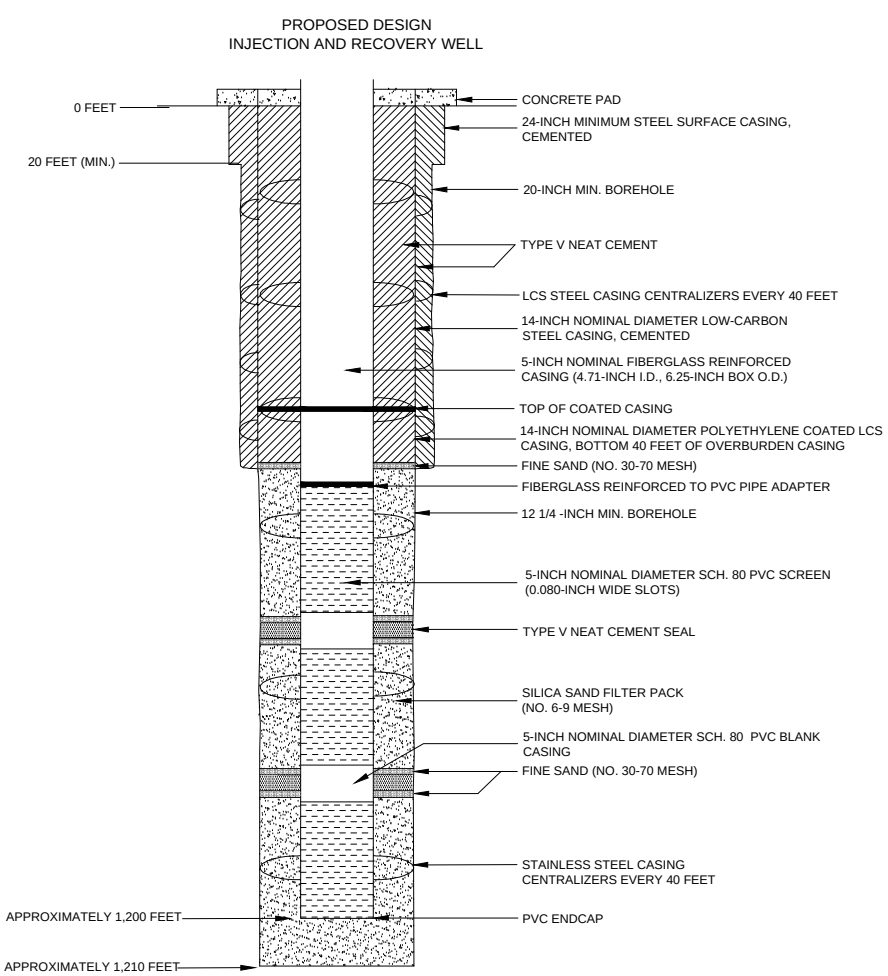
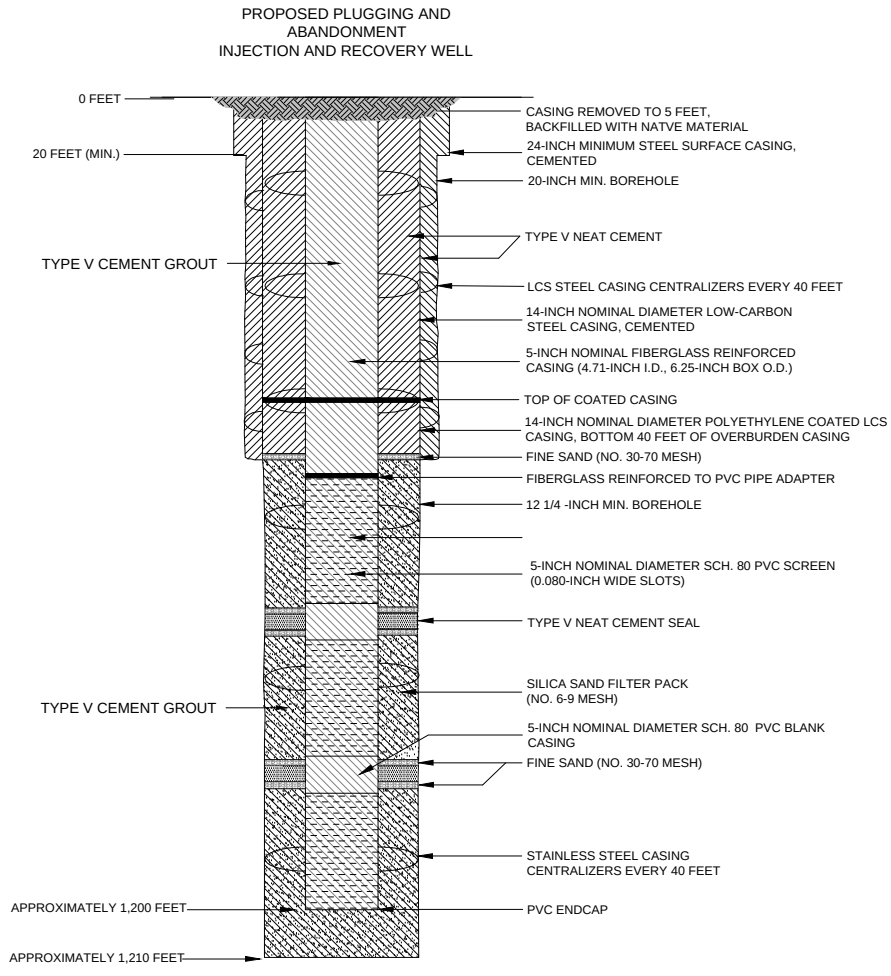
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

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Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
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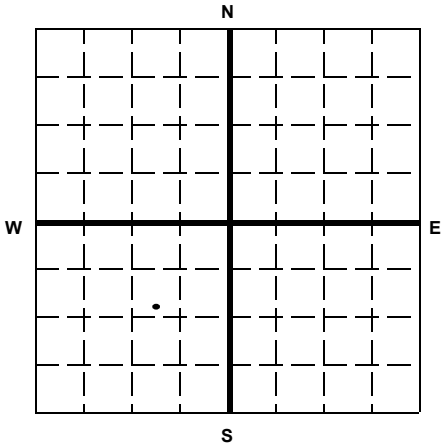
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1020 ft. frm (N/S) N Line of quarter section
and 1040 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number R-05

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other -20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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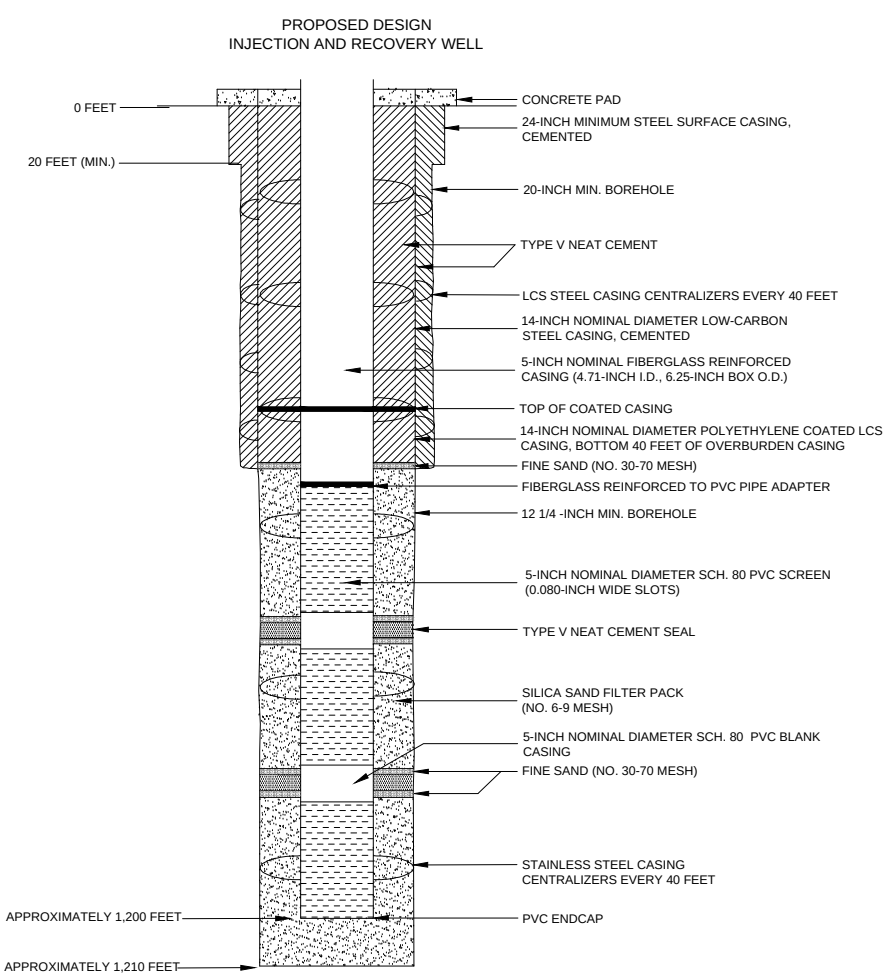
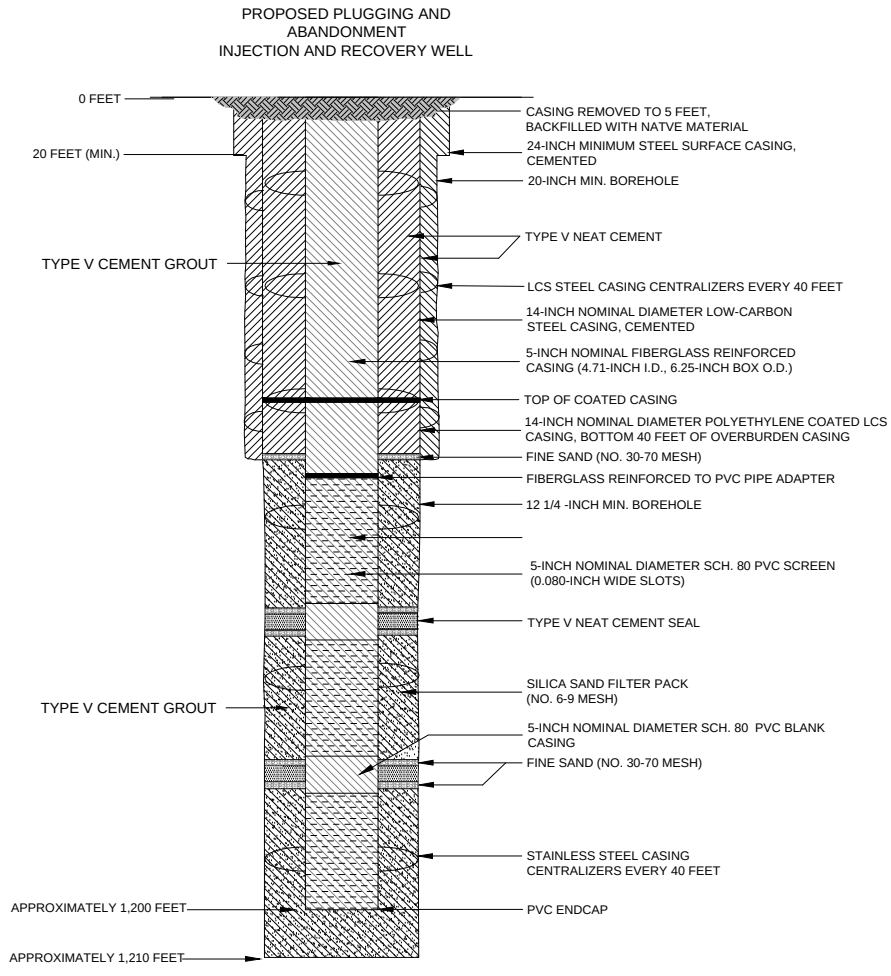
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

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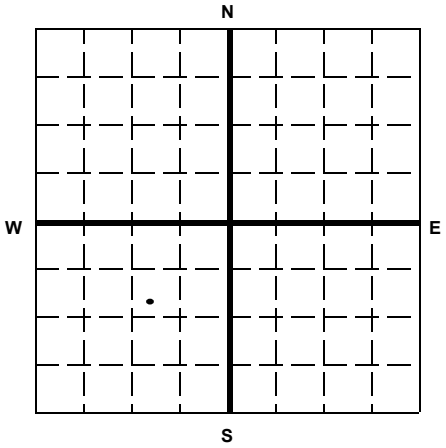

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1150 ft. frm (N/S) N Line of quarter section
and 1120 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number R-06

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other 20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	750		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

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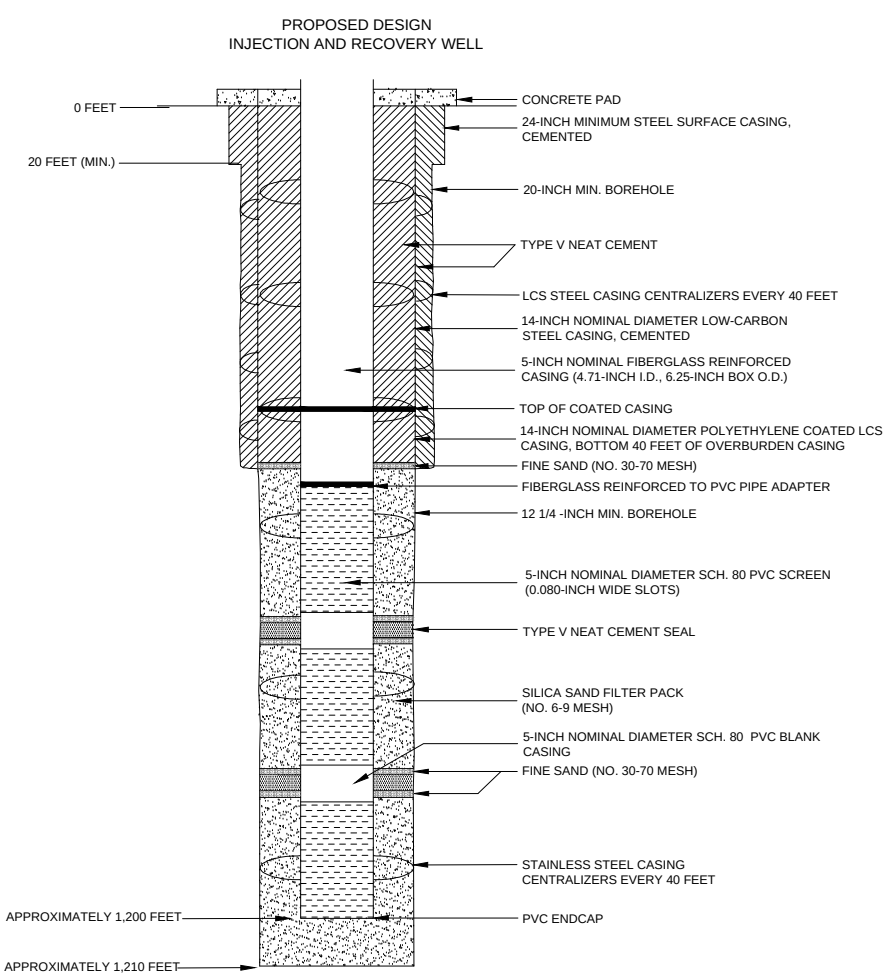
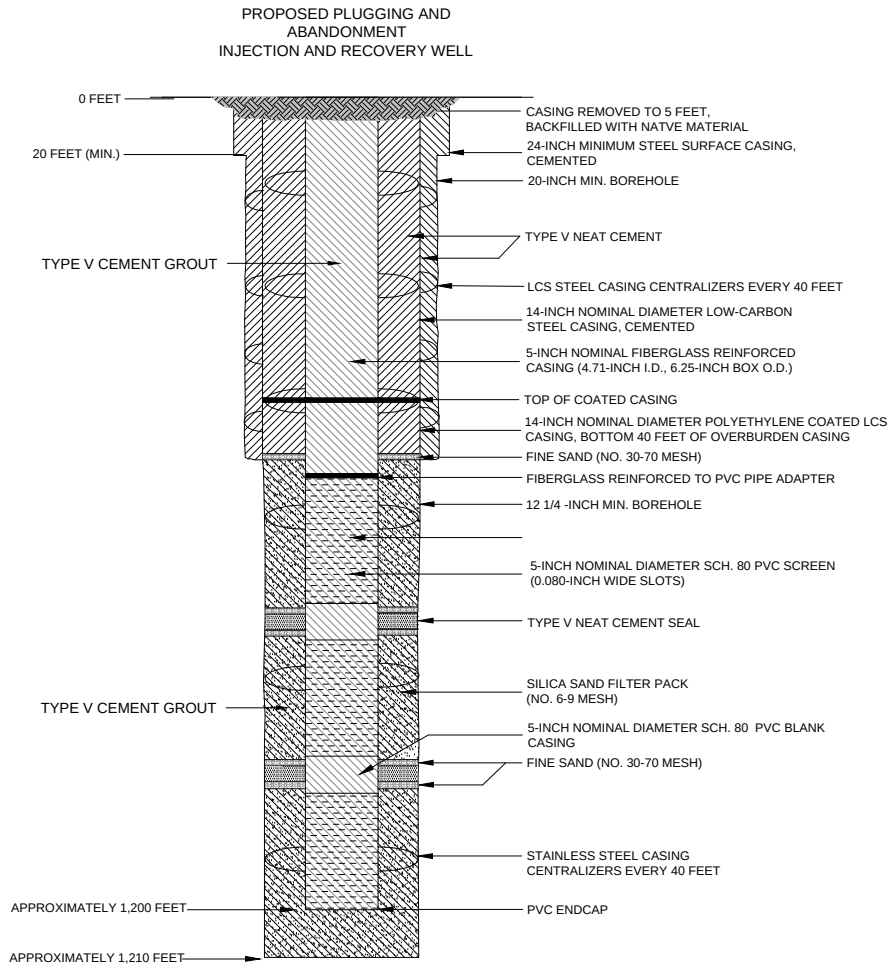
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-INJECTION_RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

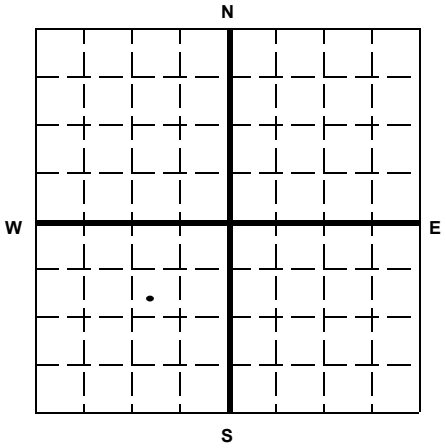
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1080 ft. frm (N/S) N Line of quarter section
and 1190 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number R-07

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other-20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

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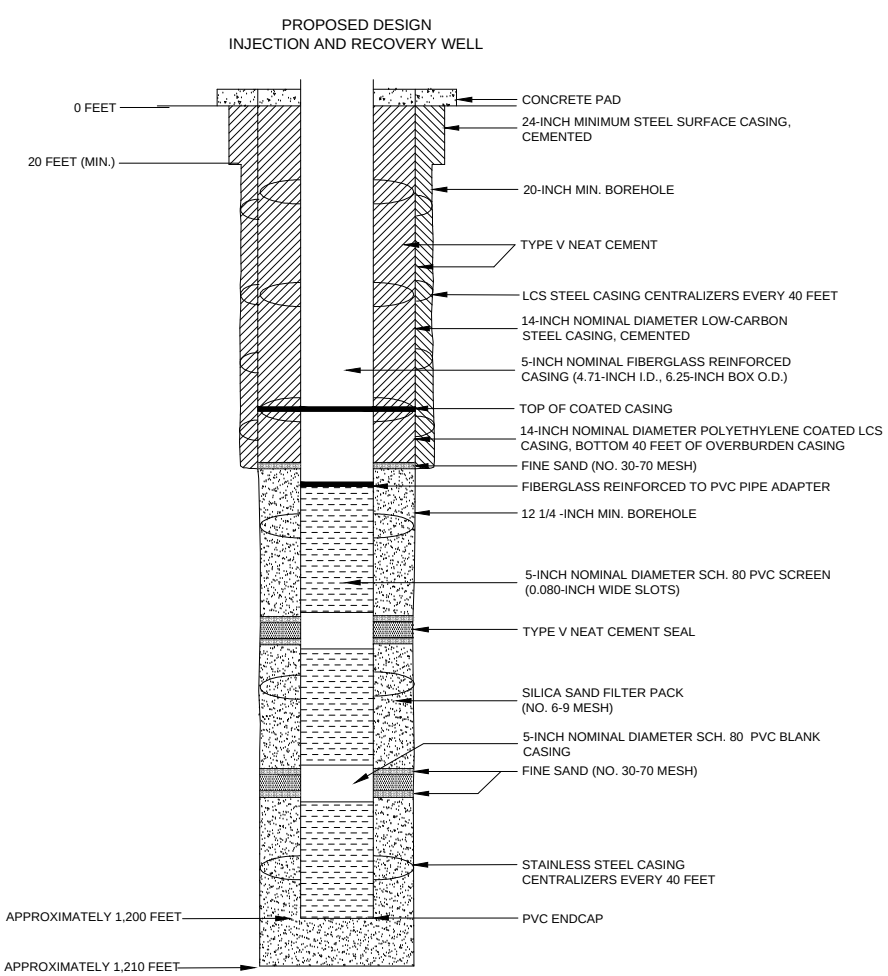
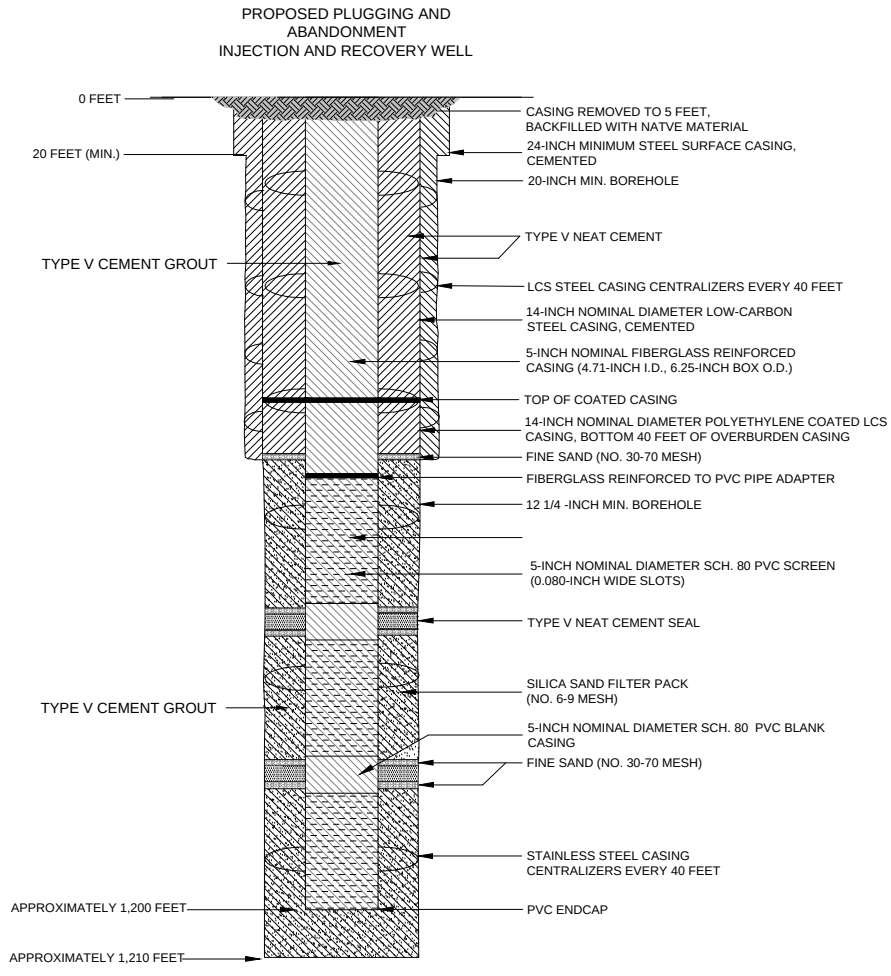
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-INJECTION_RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





NOTES

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HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

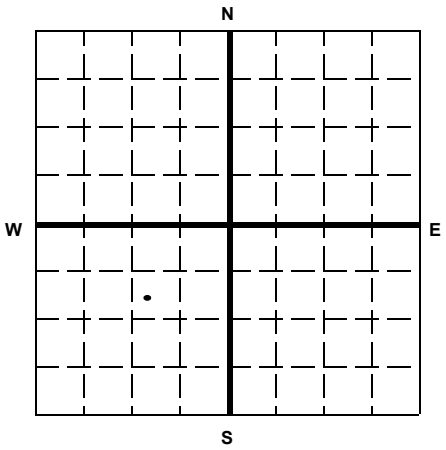
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1010 ft. frm (N/S) N Line of quarter section
and 1120 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number R-08

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
24"	94.62	20	20	28"
14"	45.68	490	490	20"
5"	5.61	510	510	14"
5"	3	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [x] Other -20" bore hole will be grouted using the plug displacement method

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	28	20	14	5			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	18	428	342	128			
Slurry Volume To Be Pumped (cu. ft.)	22.7	545	435	163			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

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Dan Johnson, VP Environmental and Technical Services		08/06/2014

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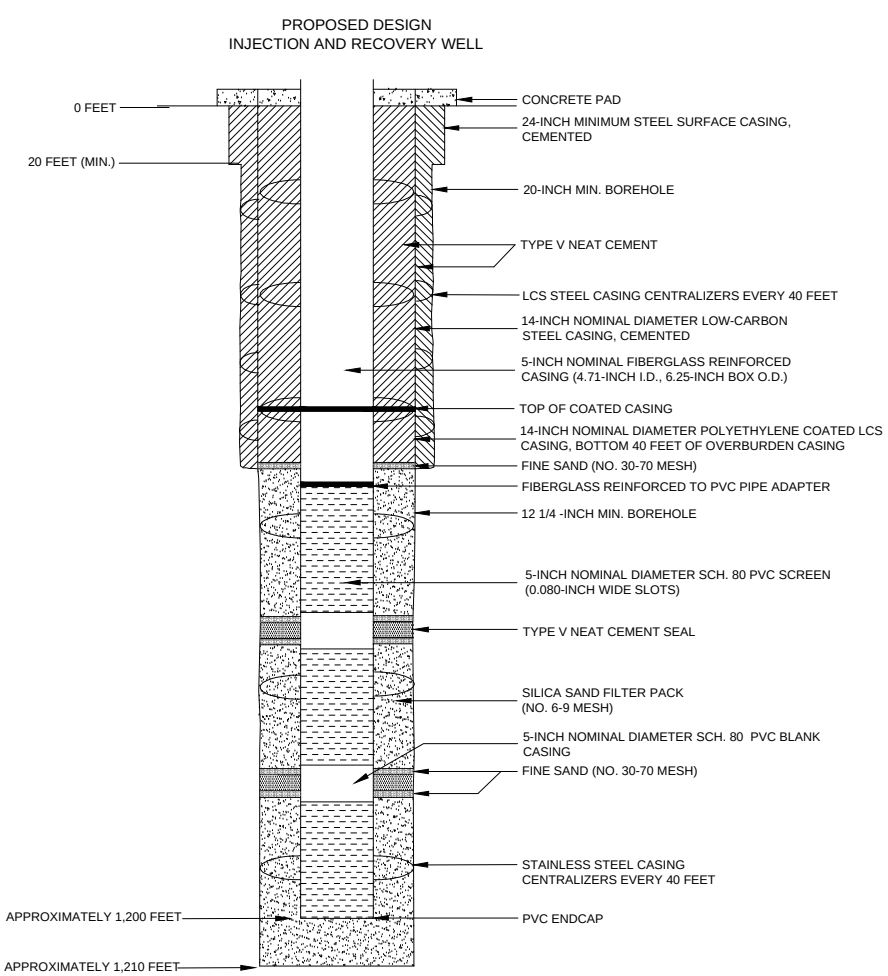
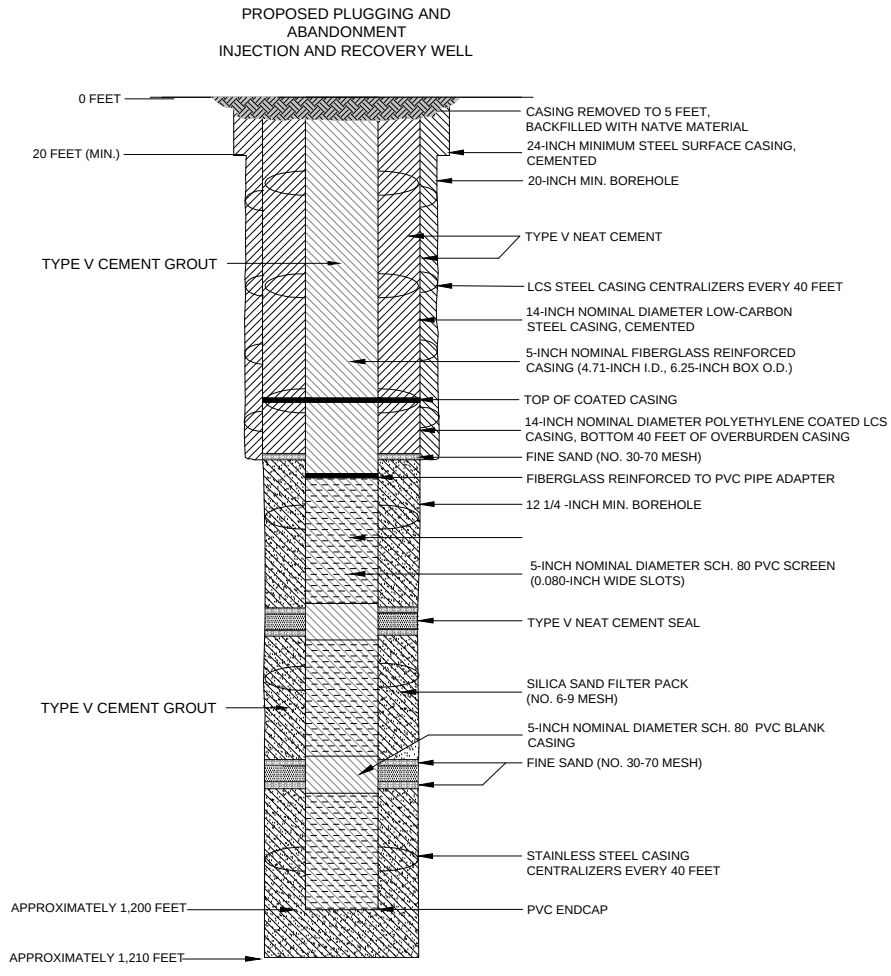
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1





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HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

TYPICAL PROPOSED INJECTION AND RECOVERY WELL ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

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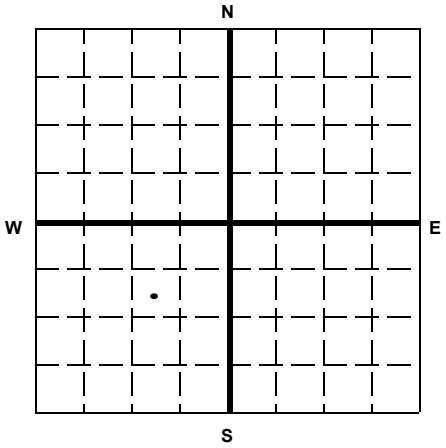
Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1080 ft. frm (N/S) N Line of quarter section
and 1135 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number R-09

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
26"	102.6	20	20	28"
16"	52.6	490	490	20"
8"	8.2	510	510	14"
8"	8	690	690	12.25"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	30	22	16	8			
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	490	1200			
Sacks of Cement To Be Used (each plug)	19	478	403	329			
Slurry Volume To Be Pumped (cu. ft.)	24.4	609	513	419			
Calculated Top of Plug (ft.)	0	0	0	0			
Measured Top of Plug (if tagged ft.)	NA	NA	NA	NA			
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4	15.4			
Type Cement or Other Material (Class III)	V	V	V	V			

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
520	720		
760	960		
1000	1200		

Estimated Cost to Plug Wells
$220,000 - includes well construction and abandonment costs

Certification

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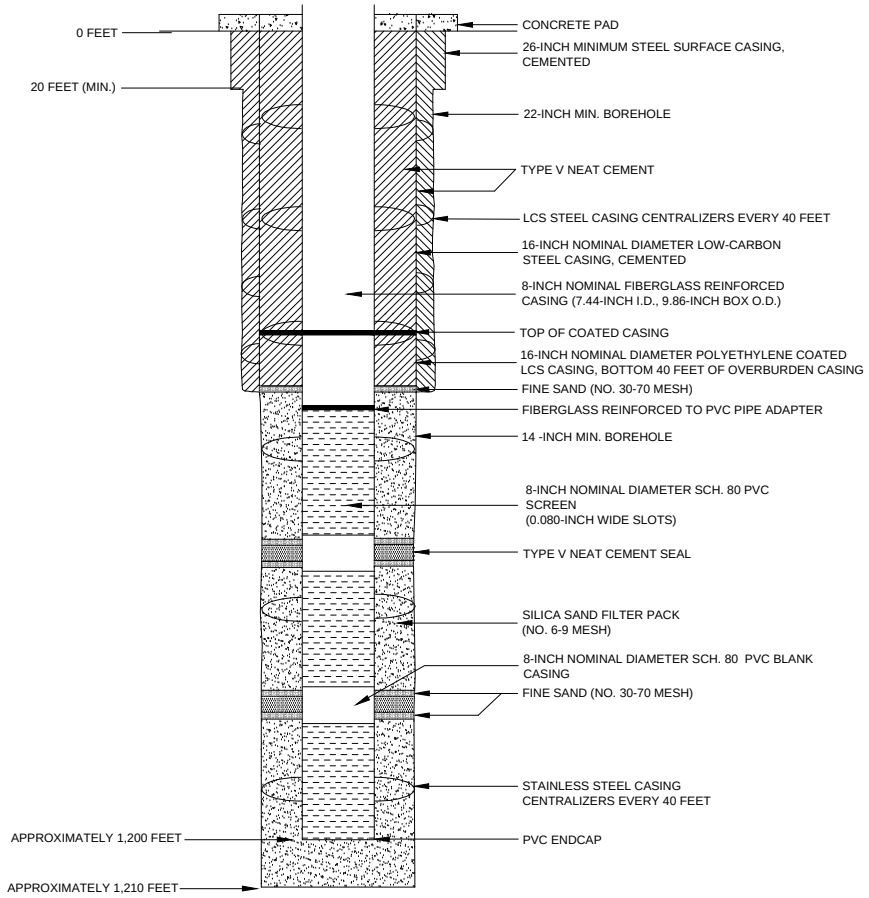
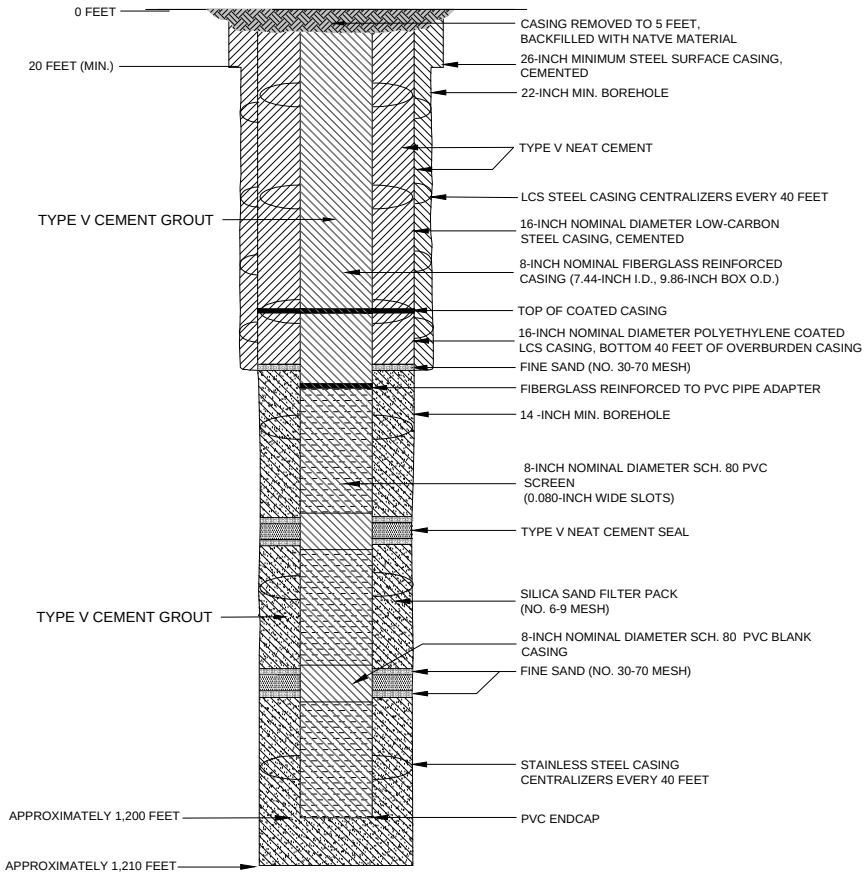
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-CENTER-RECOVERY WELL_3SCREENS.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: OPTION A-1

PROPOSED WELL DESIGN
R-09 CENTRAL RECOVERY WELL



PROPOSED PLUGGING AND
ABANDONMENT
R-09 CENTRAL RECOVERY WELL



NOTES

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HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

R-09 CENTRAL RECOVERY
PROPOSED WELL
ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

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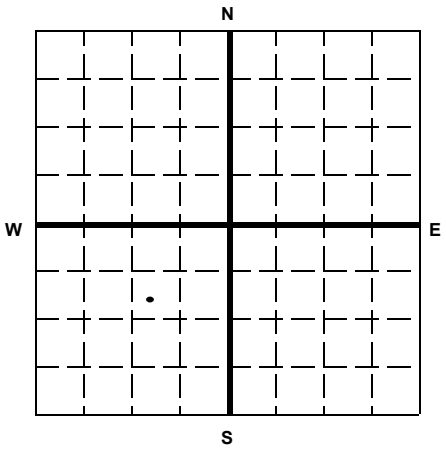

State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1045 ft. frm (N/S) N Line of quarter section
and 1045 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number WB-01

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
16"	31.66	20	20	20"
4"	5.61	510	510	10"
4"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	12	176	82				
Slurry Volume To Be Pumped (cu. ft.)	16	225	105				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
525	600	1125	1200
675	750		
825	900		
975	1050		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonment costs

Certification

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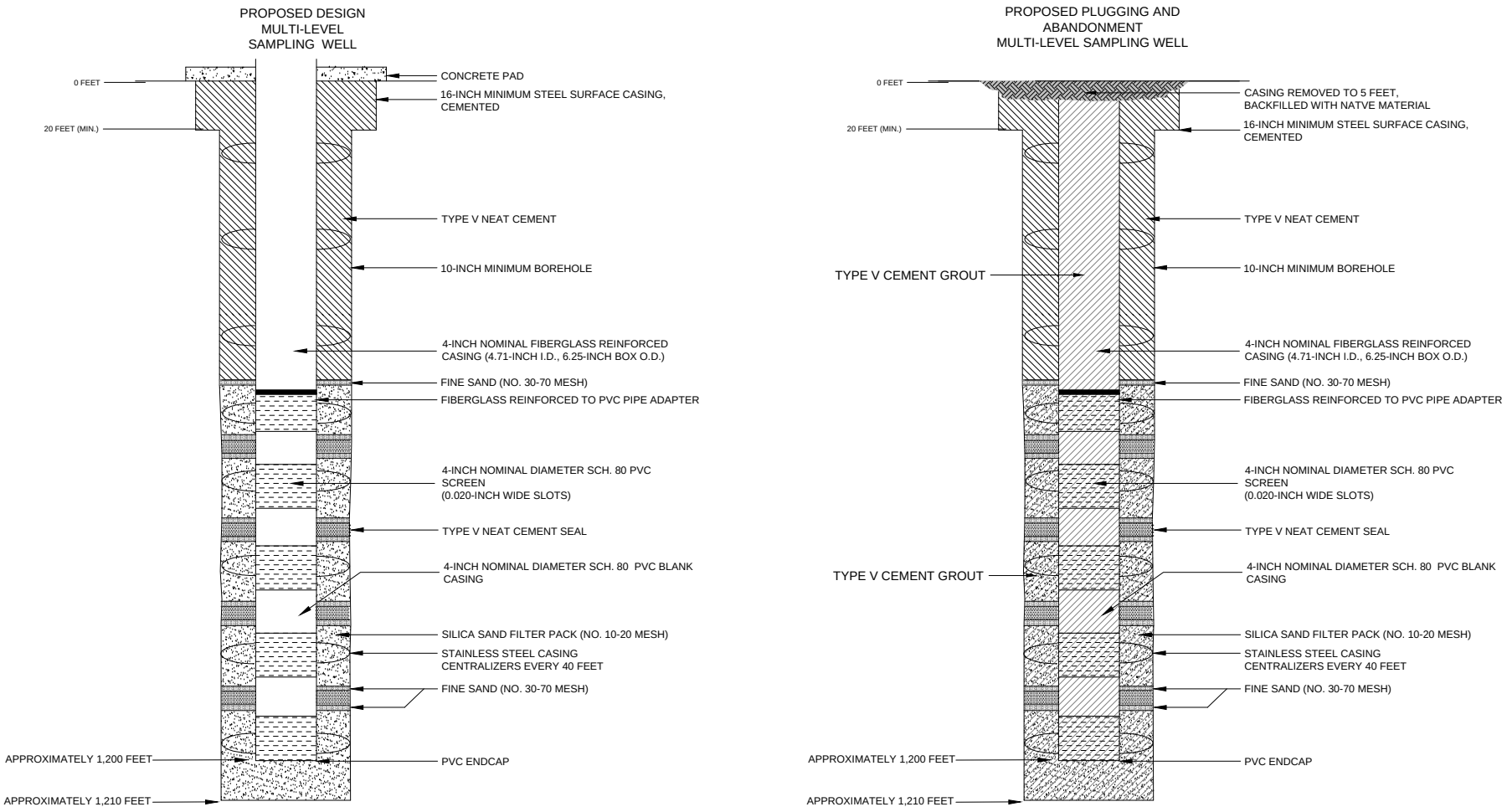
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\PTF PLUGGING\38706-300-000-WESTBAY_WELL_CONSTRUCTION DIAGRAM.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L



NOTES

1. WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

MULTI-LEVEL SAMPLING
PROPOSED WELL
ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

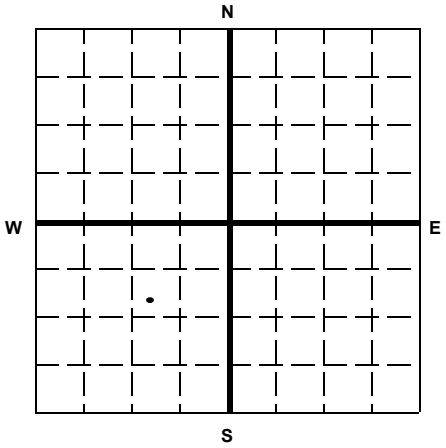
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper, Inc.
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1080 ft. frm (N/S) N Line of quarter section
and 1000 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- ☐ Individual Permit
- ☑ Area Permit
- ☐ Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- ☐ CLASS I
- ☐ CLASS II
  - ☐ Brine Disposal
  - ☐ Enhanced Recovery
  - ☐ Hydrocarbon Storage
- ☑ CLASS III

Well Number WB-02

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
16"	31.66	20	20	20"
4"	5.61	510	510	10"
4"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- ☑ The Balance Method
- ☐ The Dump Bailer Method
- ☐ The Two-Plug Method
- ☐ Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	12	176	82				
Slurry Volume To Be Pumped (cu. ft.)	16	225	105				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
525	600	1125	1200
675	750		
825	900		
975	1050		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonement costs

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP Environmental and Technical Services		08/06/2014

Paperwork Reduction Act Notice

The public reporting and record keeping burden for this collection of information is estimated to average 4.5 hours for operators of Class I hazardous wells, 1.5 hours for operators of Class I non-hazardous wells, 3 hours for operators of Class II wells, and 1.5 hours for operators of Class III wells.
Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.
Please send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Office of Environmental Information, Collection Strategies Division, U.S. Environmental Protection Agency (2822), Ariel Rios Building, 1200 Pennsylvania Ave., NW., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA ICR number and OMB control number in any correspondence.

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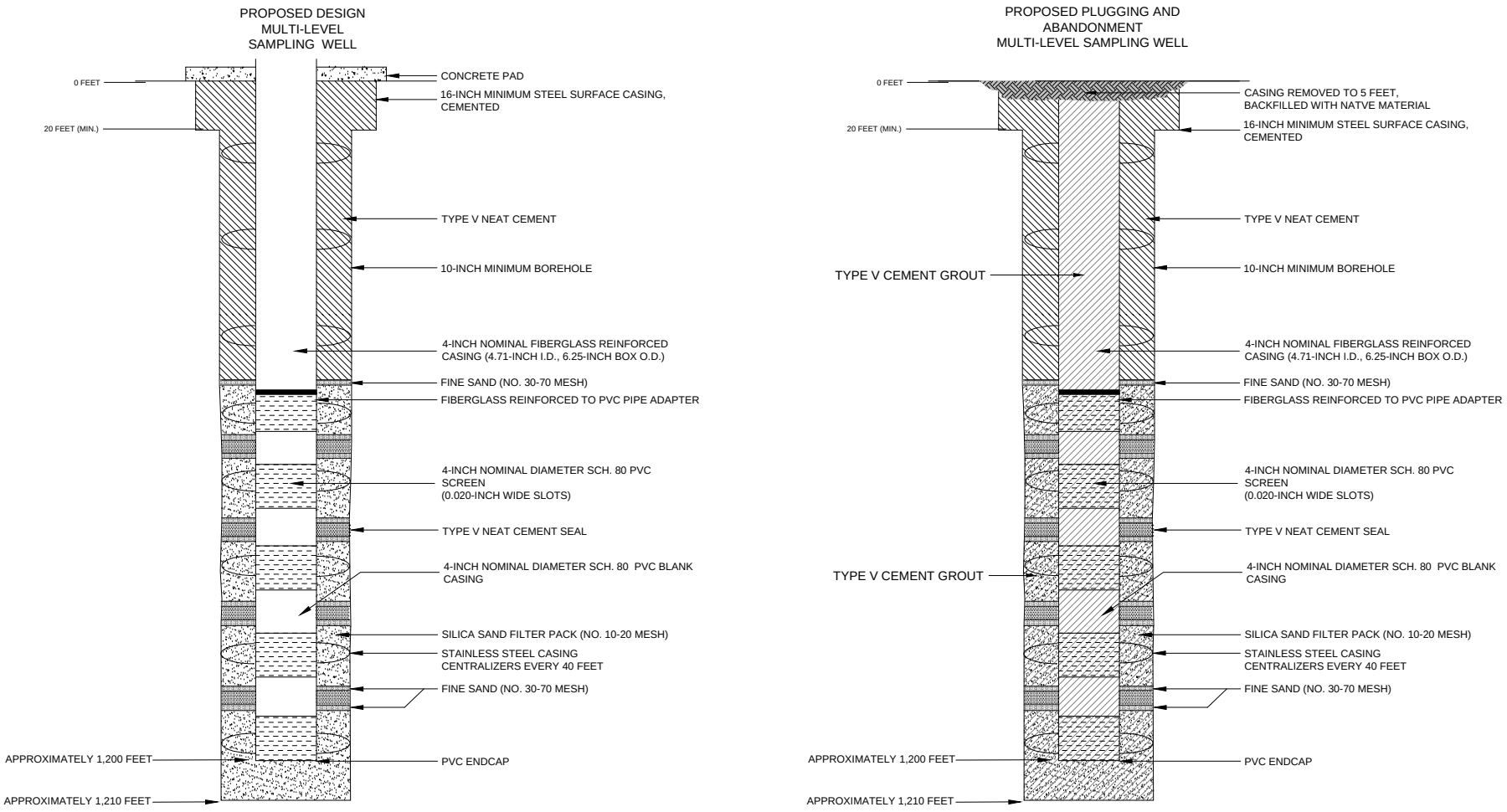
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L



NOTES

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HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

MULTI-LEVEL SAMPLING
PROPOSED WELL
ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

OMB No. 2040-0042 Approval Expires 11/30/2014

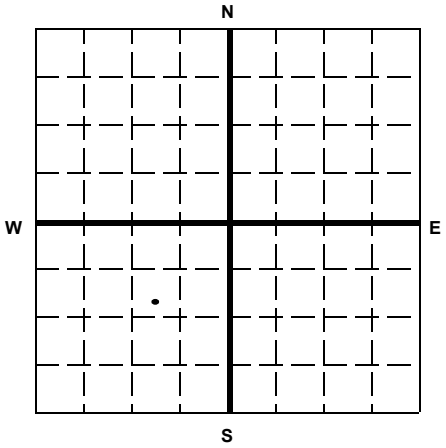
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Florence Copper Project
1575 W Hunt Hwy, Florence, AZ 85132

Name and Address of Owner/Operator
Florence Copper
1575 W Hunt Hwy, Florence, AZ 85132

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number
Arizona	Pinal	AZ396000001

Surface Location Description
SW 1/4 of SW 1/4 of NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location 1120 ft. frm (N/S) N Line of quarter section
and 1045 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number WB-03

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
16"	31.66	20	20	20"
4"	5.61	510	510	10"
4"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
- [x] The Balance Method
- [ ] The Dump Bailer Method
- [ ] The Two-Plug Method
- [ ] Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche	20	10	4				
Depth to Bottom of Tubing or Drill Pipe (ft	20	490	1200				
Sacks of Cement To Be Used (each plug)	12	176	82				
Slurry Volume To Be Pumped (cu. ft.)	16	225	105				
Calculated Top of Plug (ft.)	0	0	0				
Measured Top of Plug (if tagged ft.)	NA	NA	NA				
Slurry Wt. (Lb./Gal.)	15.4	15.4	15.4				
Type Cement or Other Material (Class III)	V	V	V				

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
525	600	1125	1200
675	750		
825	900		
975	1050		

Estimated Cost to Plug Wells
$150,000 - includes well construction and abandonement costs

Certification

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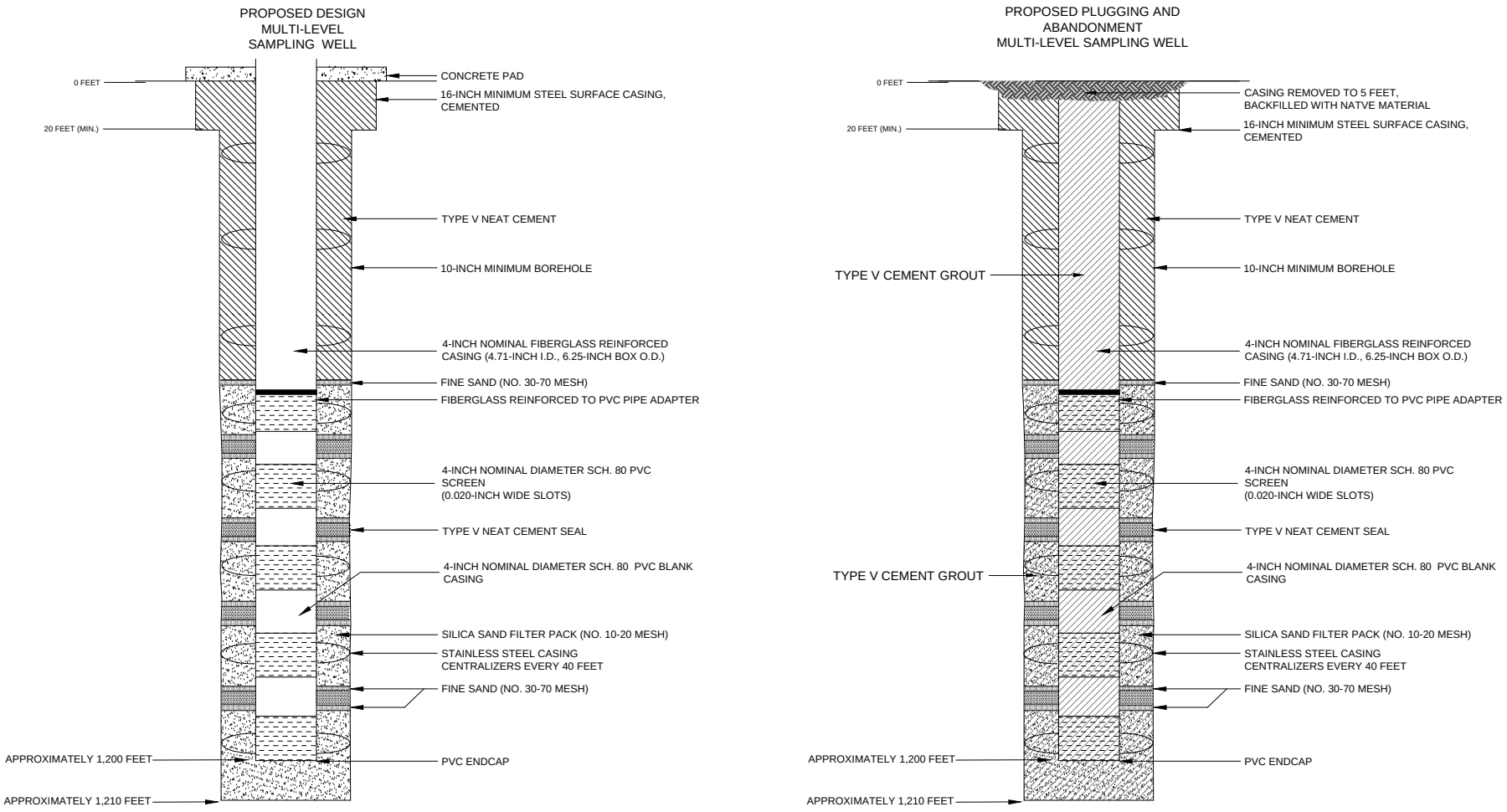
Operator Name: CANDREVA, LAUREN Plot Date: August 6, 2014 Drawing Layout: HA-FIG-A-L



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HALEY & ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

MULTI-LEVEL SAMPLING
PROPOSED WELL
ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1

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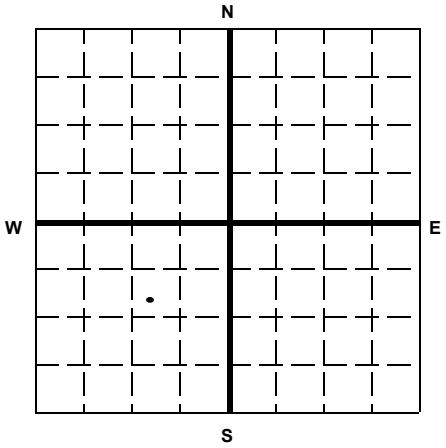

State	County	Permit Number
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and 1080 ft. from (E/W) E Line of quarter section.

TYPE OF AUTHORIZATION
- [ ] Individual Permit
- [x] Area Permit
- [ ] Rule

Number of Wells 1

Lease Name NA

WELL ACTIVITY
- [ ] CLASS I
- [ ] CLASS II
  - [ ] Brine Disposal
  - [ ] Enhanced Recovery
  - [ ] Hydrocarbon Storage
- [x] CLASS III

Well Number WB-04

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
16"	31.66	20	20	20"
4"	5.61	510	510	20"
4"	2	690	690	10"

METHOD OF EMPLACEMENT OF CEMENT PLUGS
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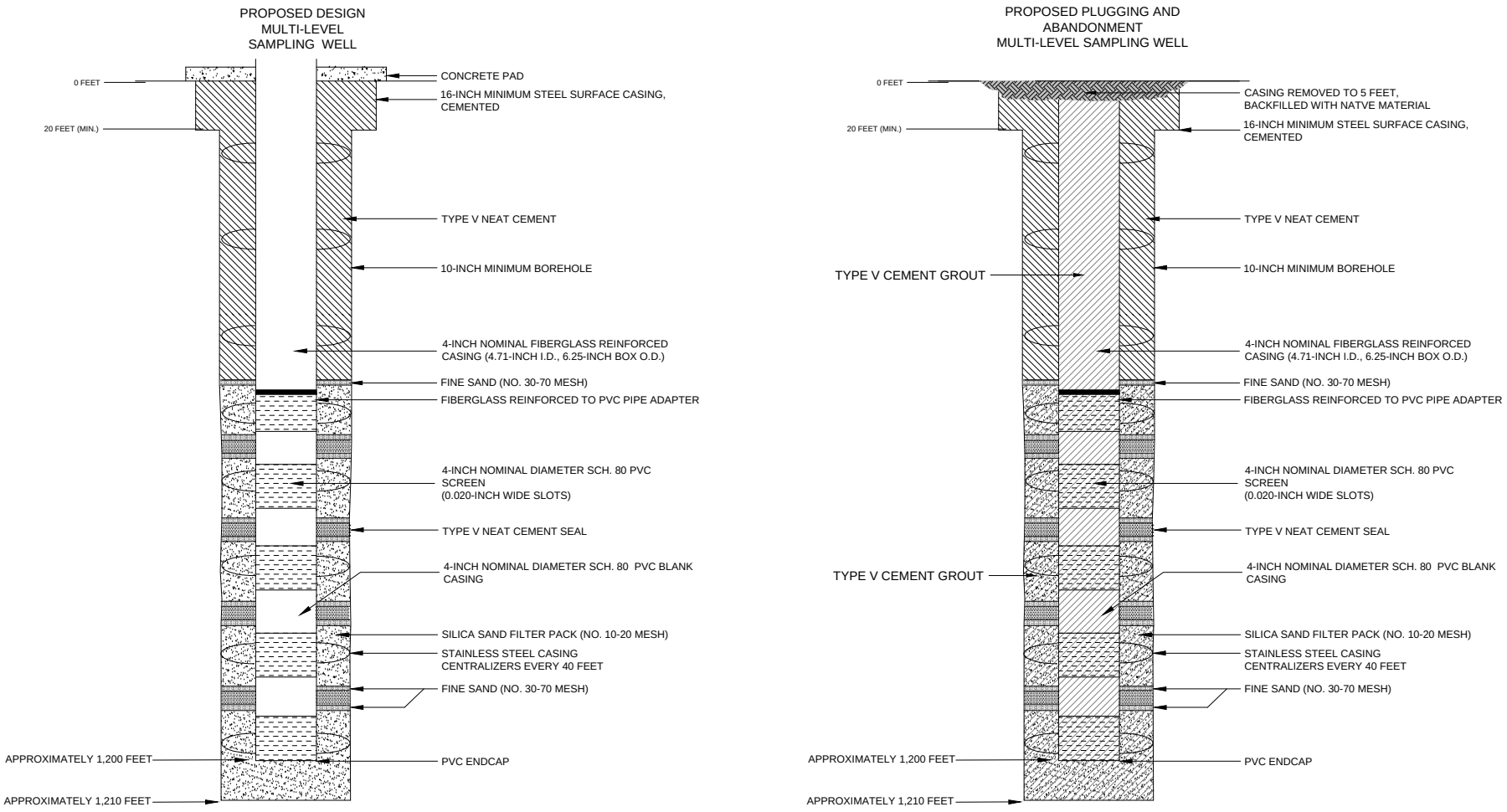

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HALEY & ALDRICH

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FLORENCE, ARIZONA

MULTI-LEVEL SAMPLING
PROPOSED WELL
ABANDONMENT SCHEMATIC

SCALE: NOT TO SCALE
AUGUST 2014

FIGURE 1