INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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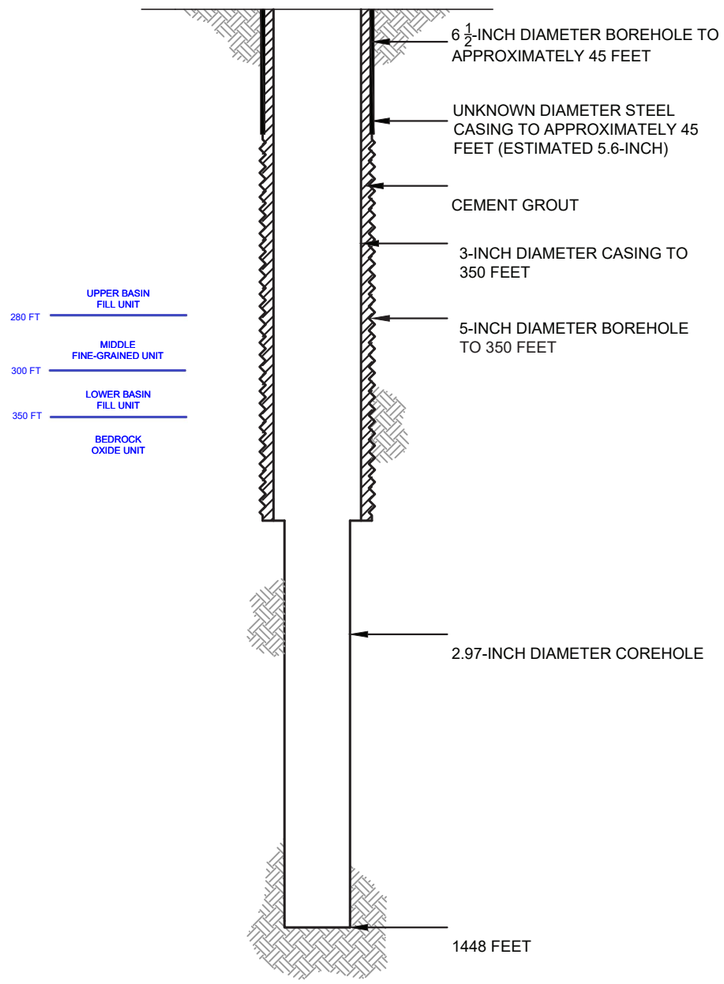
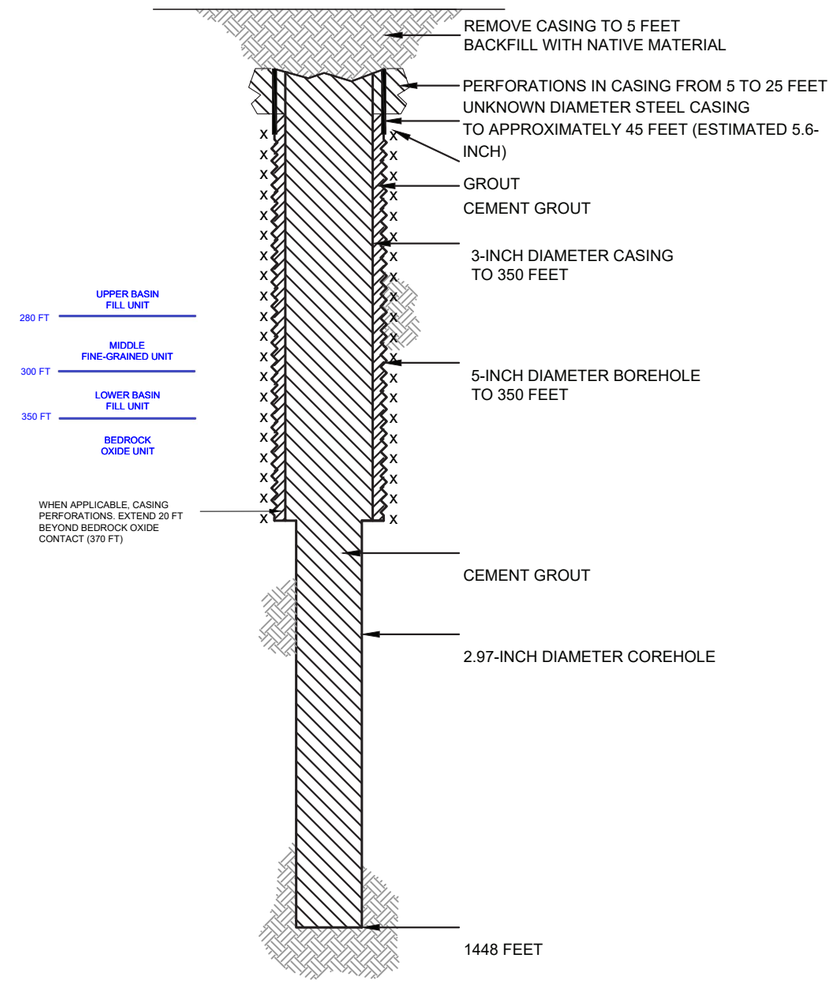
AS-BUILT COREHOLE 136S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 136S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 136S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		137

State	County
Arizona	Pinal

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

Latitude 33.05333565

Surface Location

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

Longitude -111.4338091

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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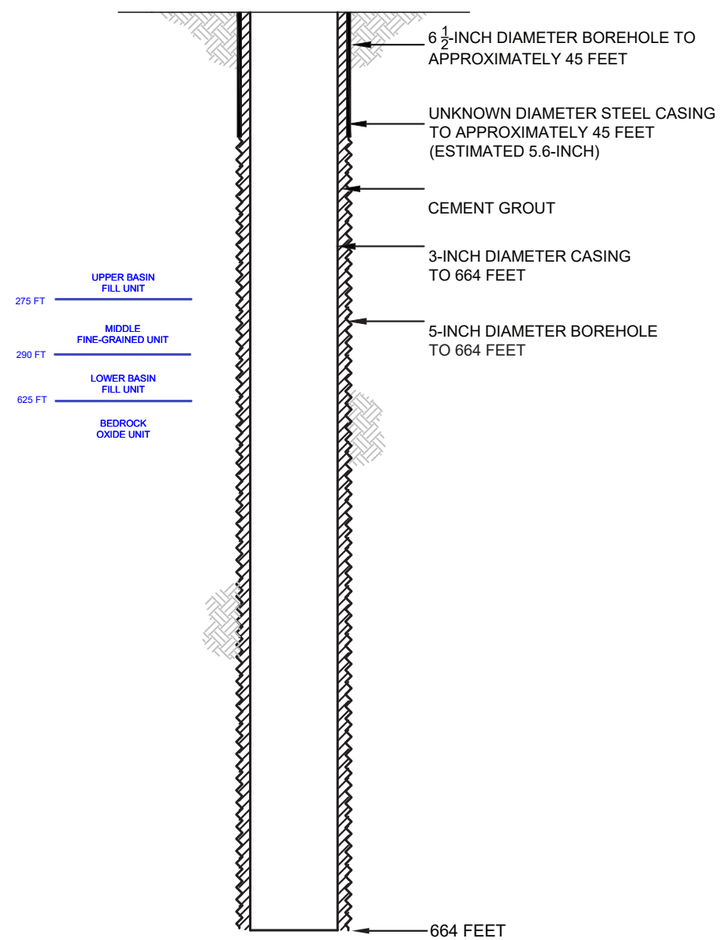
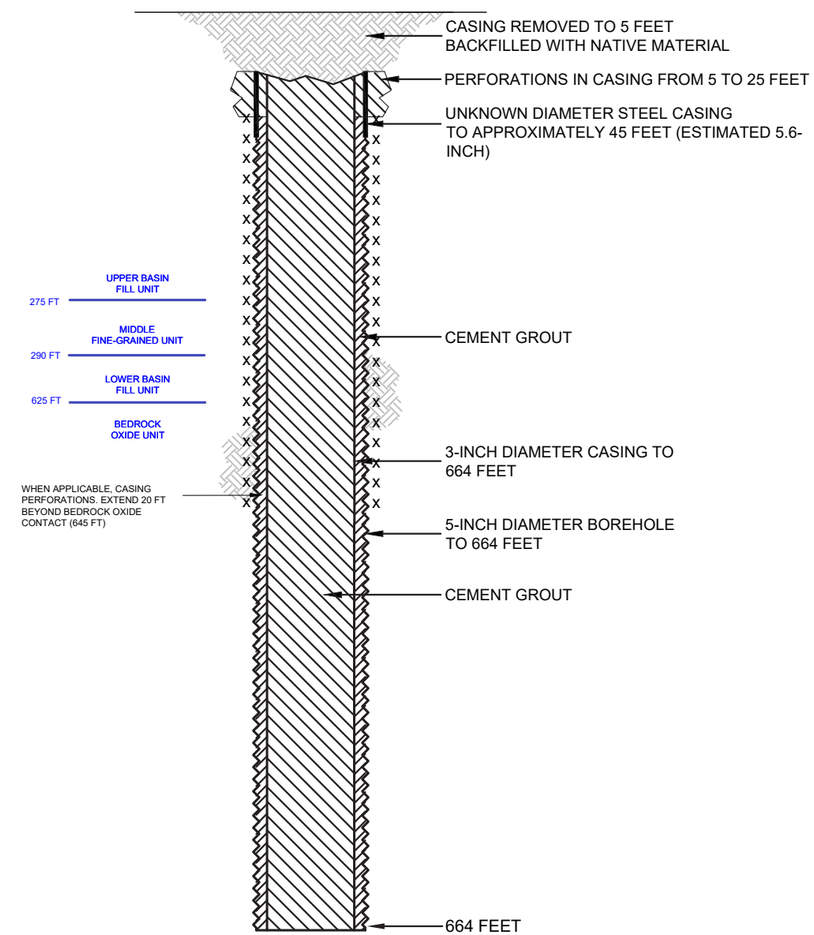
AS-BUILT COREHOLE 137



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 137



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 137 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		138

State	County
Arizona	Pinal

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

Latitude 33.05331931

Longitude -111.4313695

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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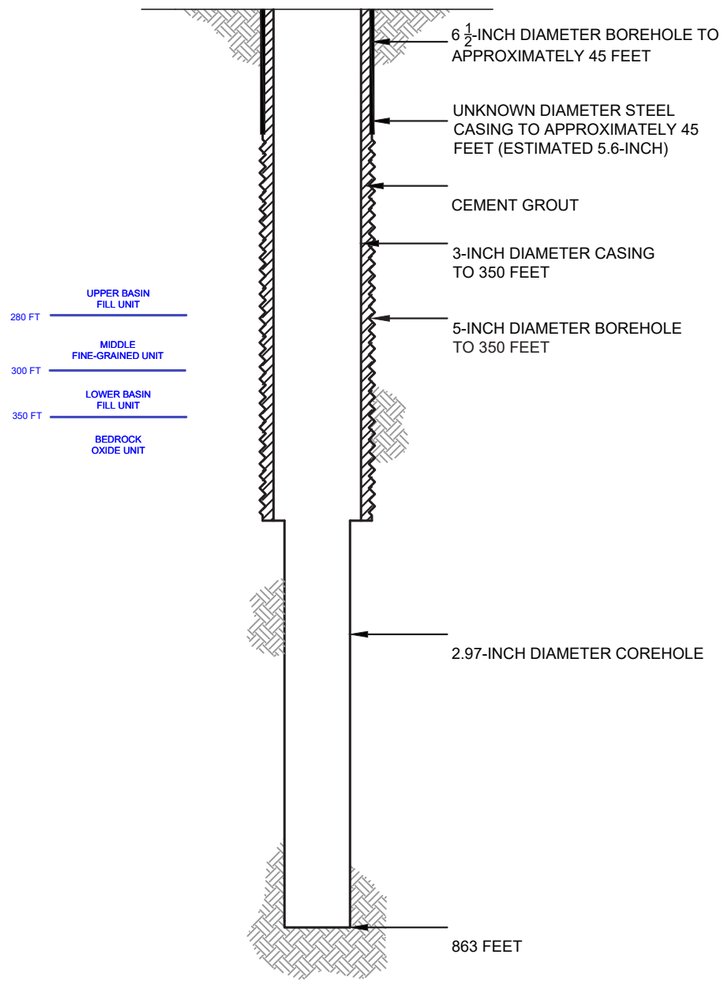
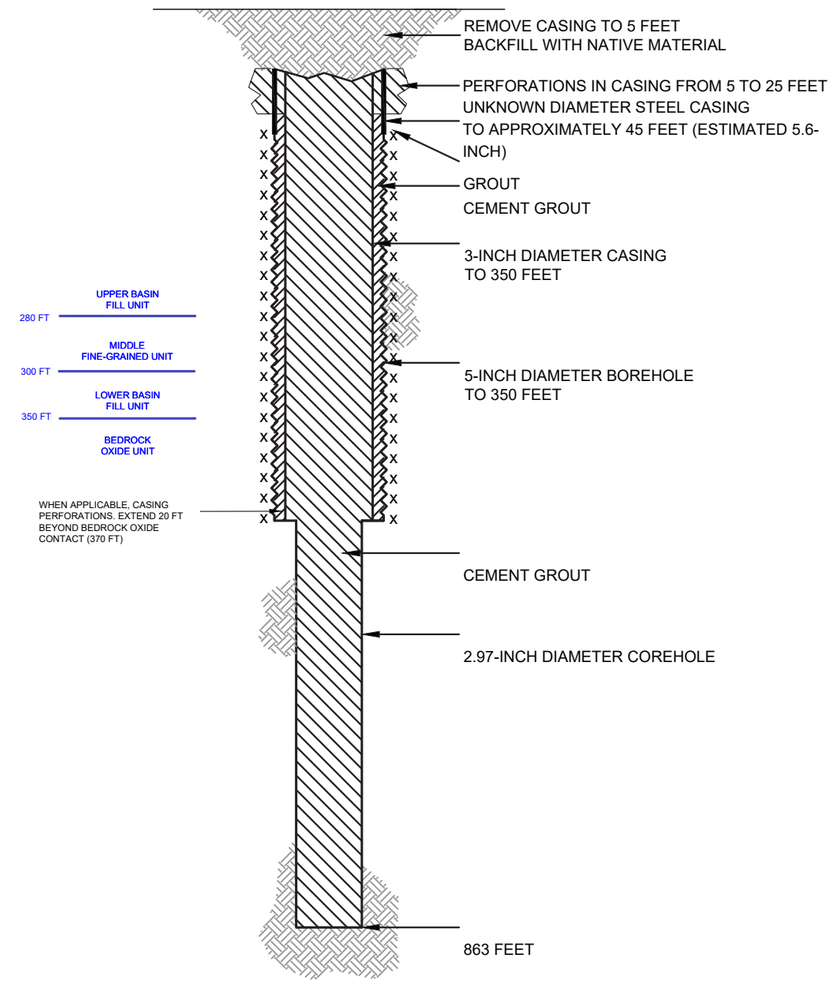
AS-BUILT COREHOLE 138



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 138



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 138 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		139S

State	County
Arizona	Pinal

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

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Surface Location

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

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If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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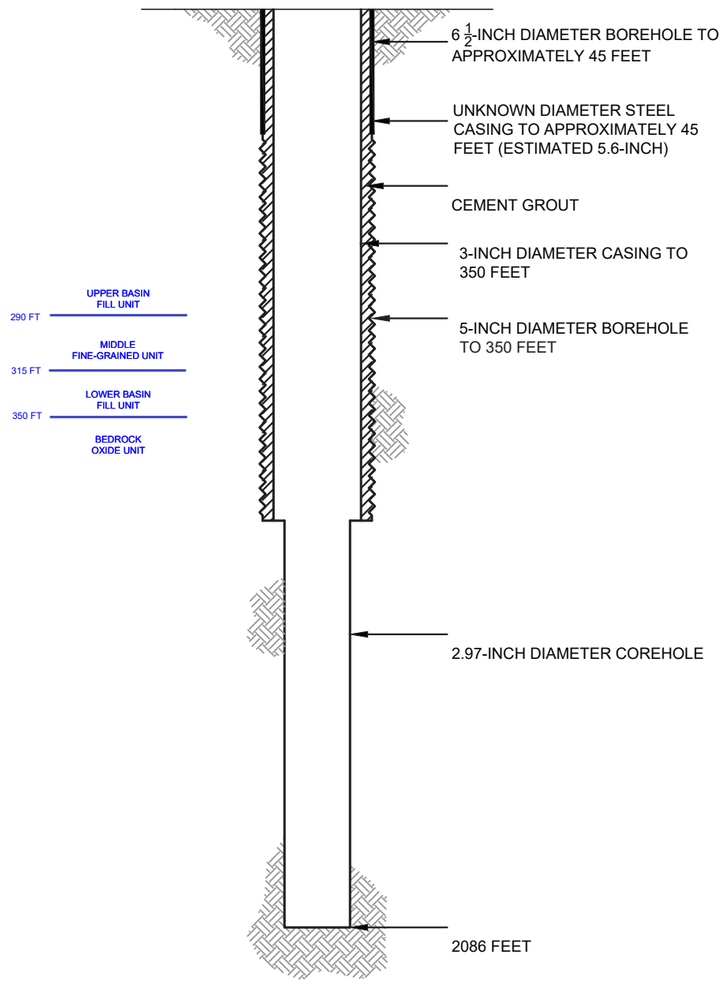
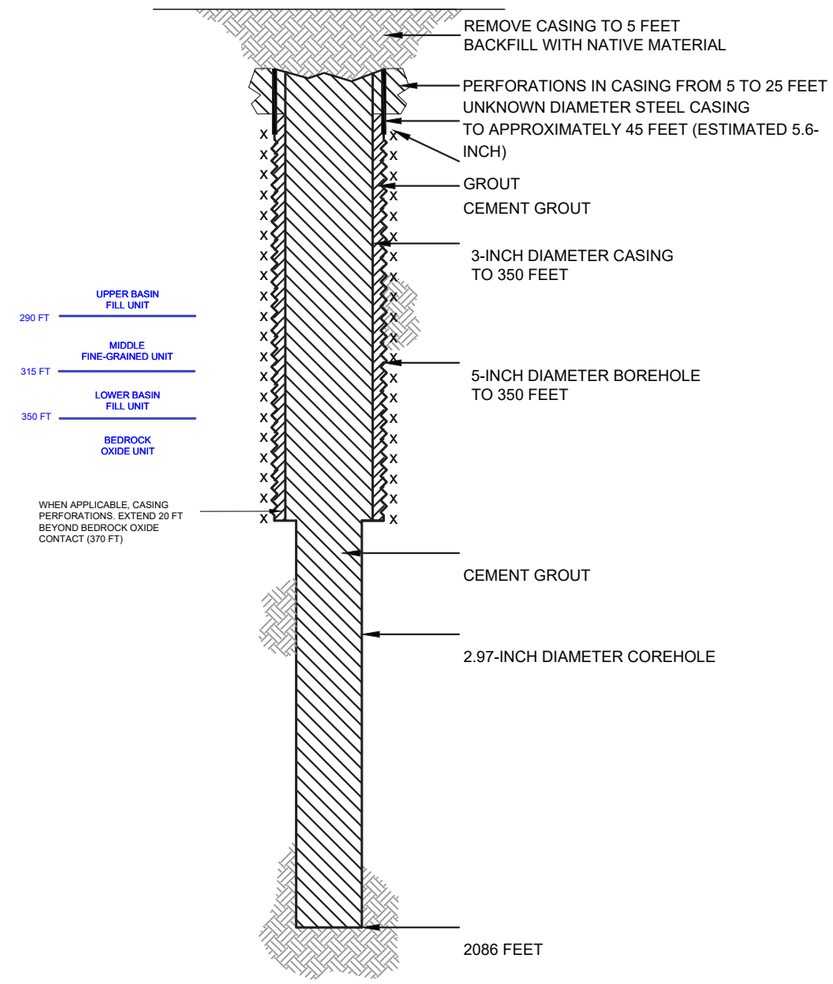
AS-BUILT COREHOLE 139S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 139S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 139S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		140S

State	County
Arizona	Pinal

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

Latitude 33.05092715

Longitude -111.4281213

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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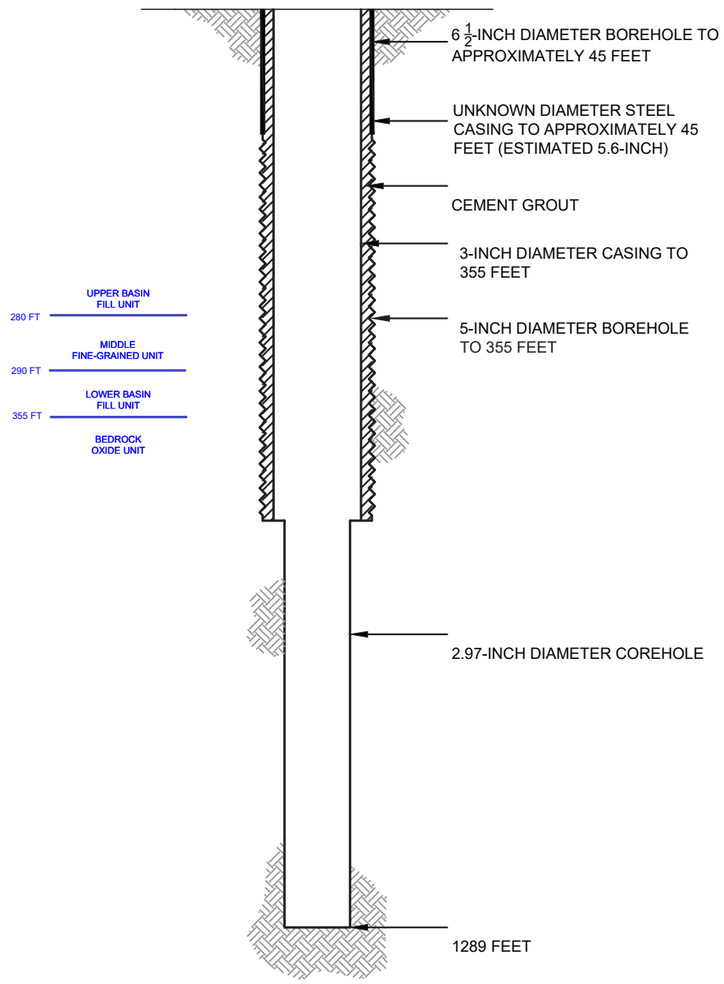
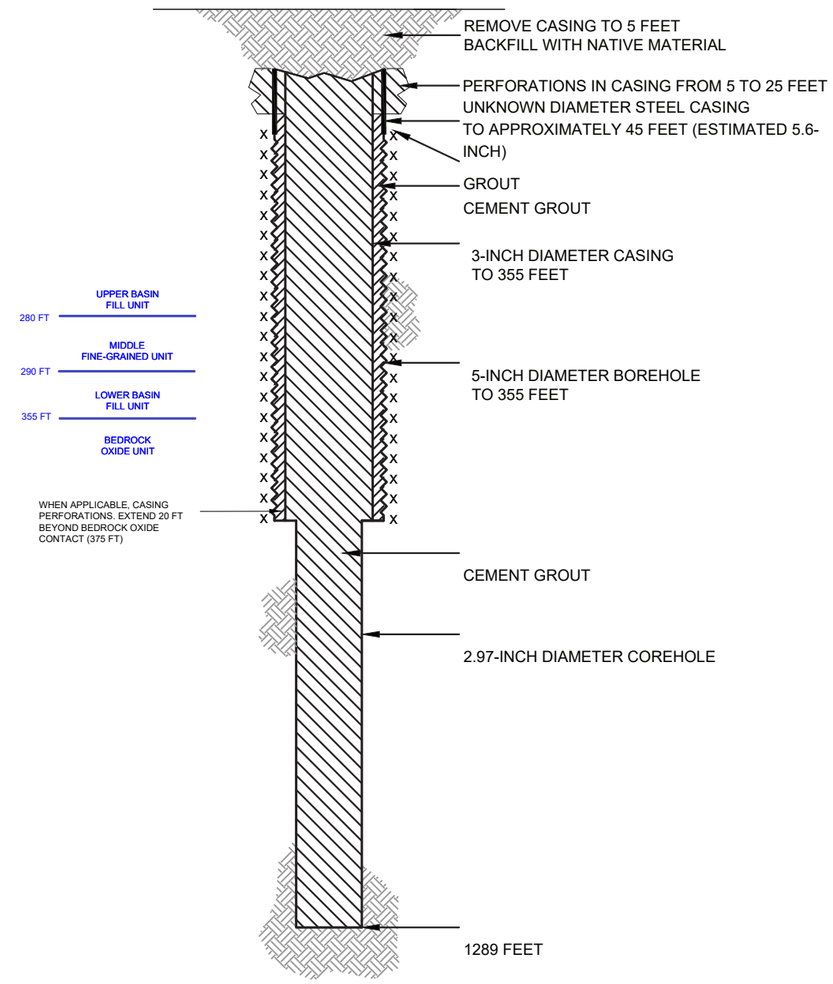
AS-BUILT COREHOLE 140S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 140S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 140S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		141S

State	County
Arizona	Pinal

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

Latitude 33.05226082

Longitude -111.4240775

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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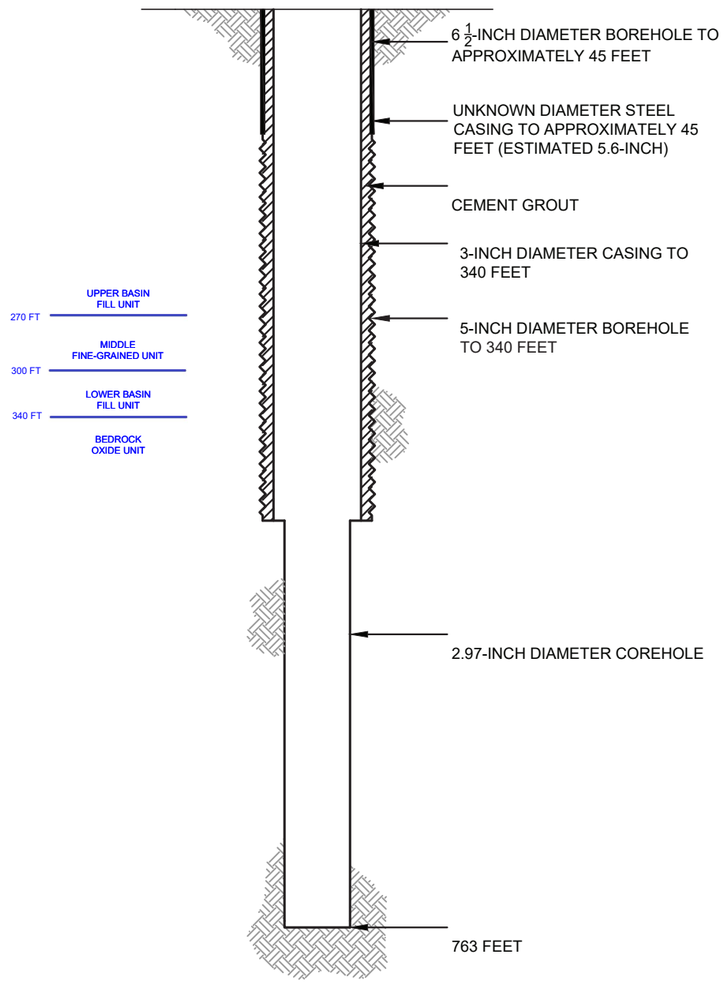
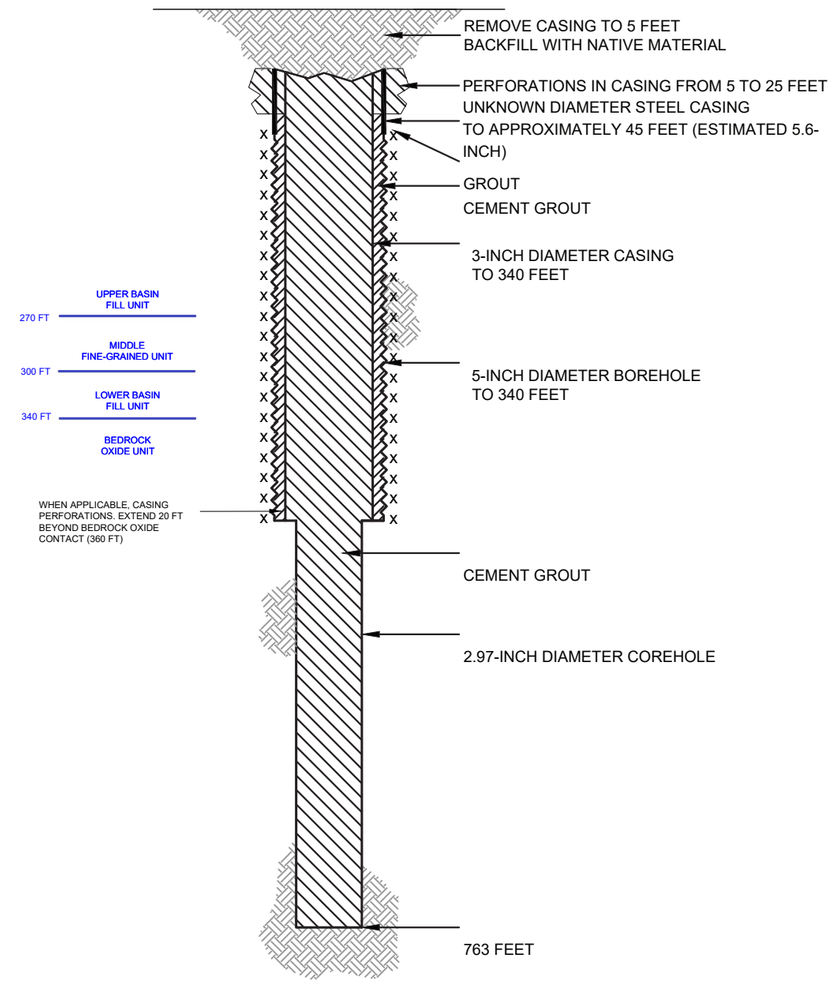
AS-BUILT COREHOLE 141S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 141S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 141S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		142MF

State	County
Arizona	Pinal

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

Latitude 33.04619757

Longitude -111.4264997

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

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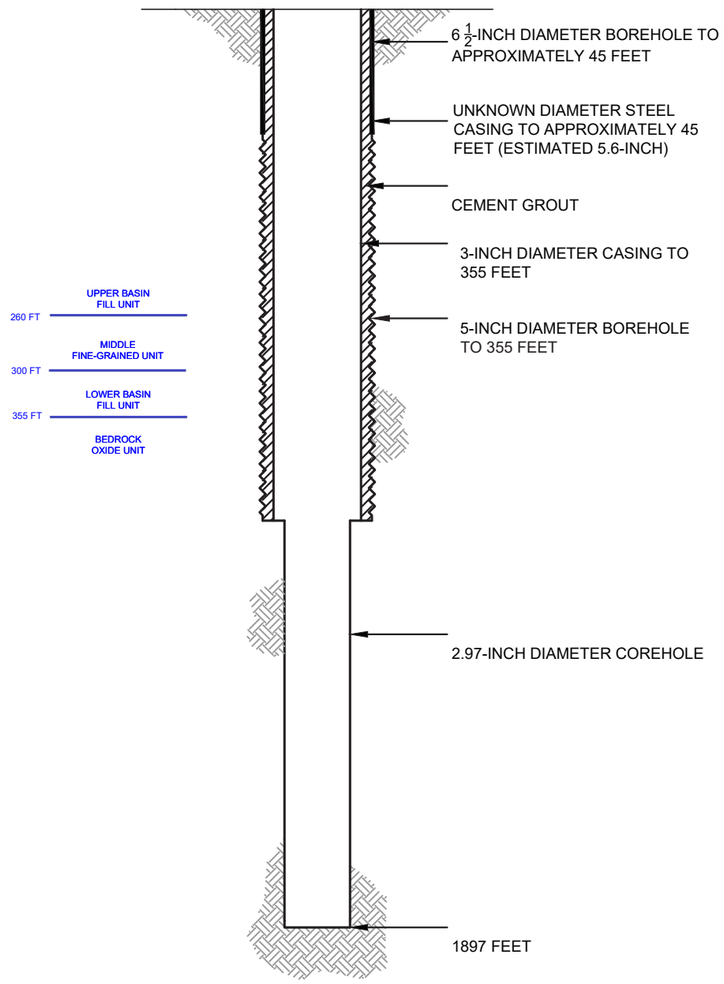
For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

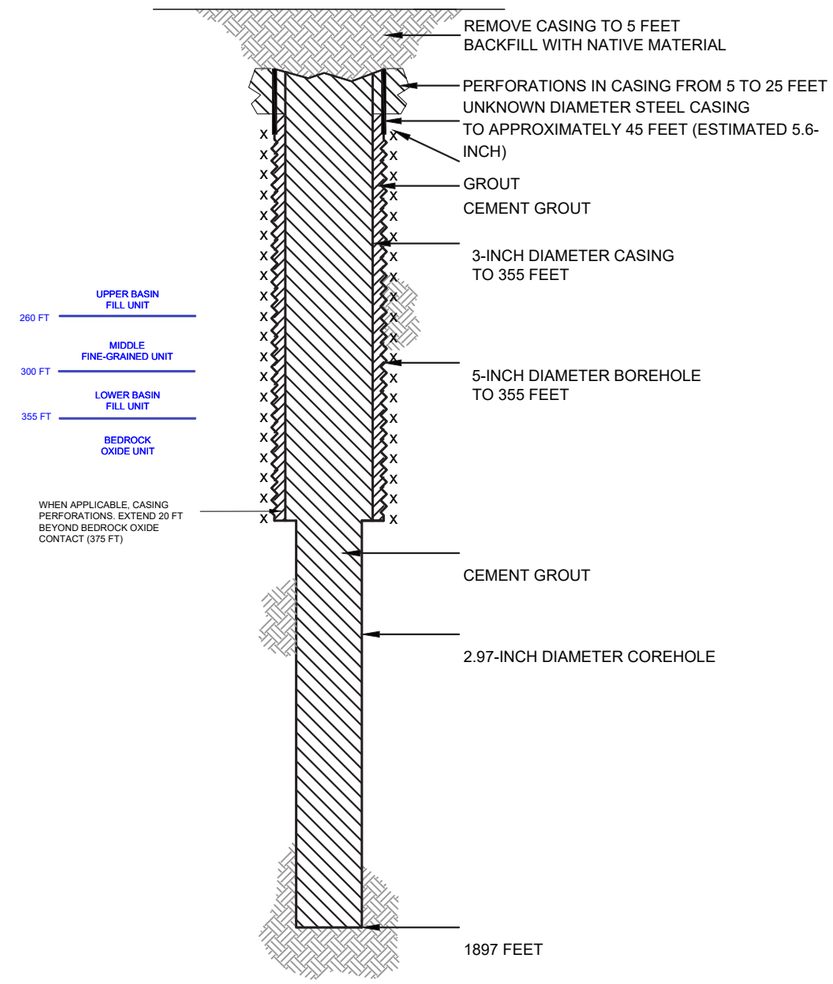
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 142MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 142MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 142MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

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G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

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Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		144

State	County
Arizona	Pinal

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

Latitude 33.05331725

Longitude -111.4297136

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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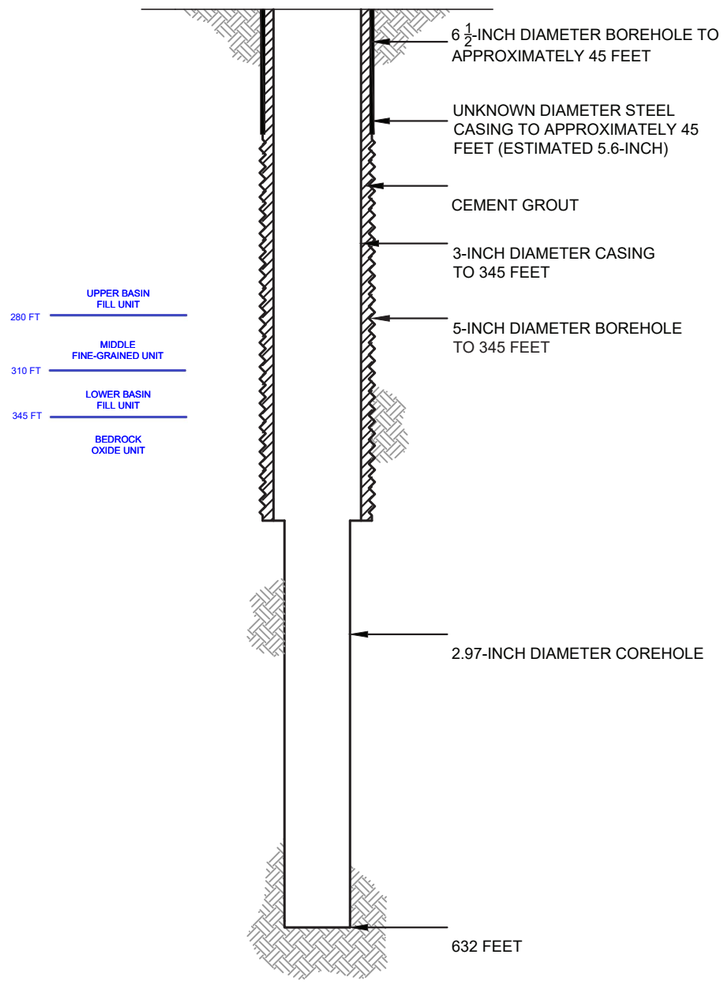
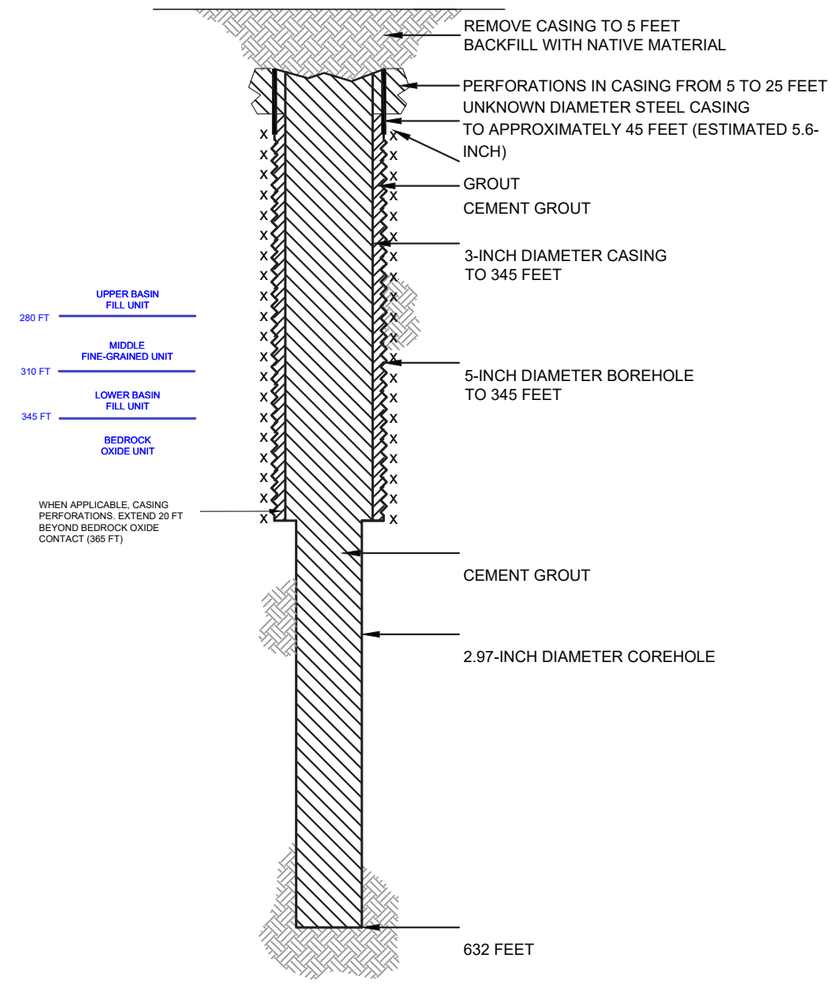
AS-BUILT COREHOLE 144



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 144



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 144 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
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FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

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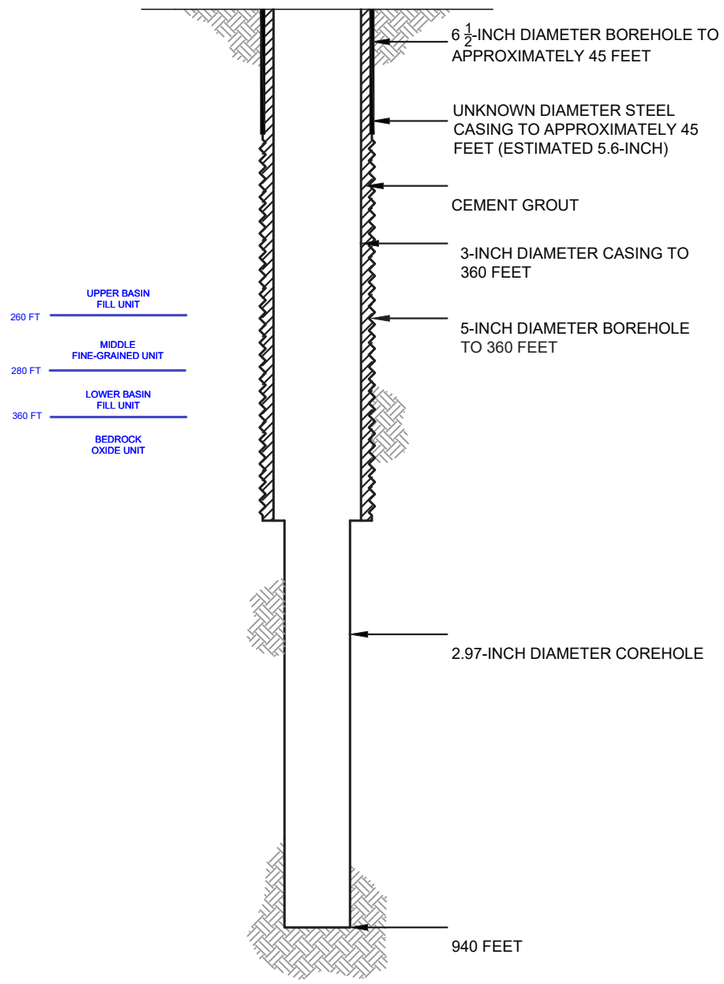
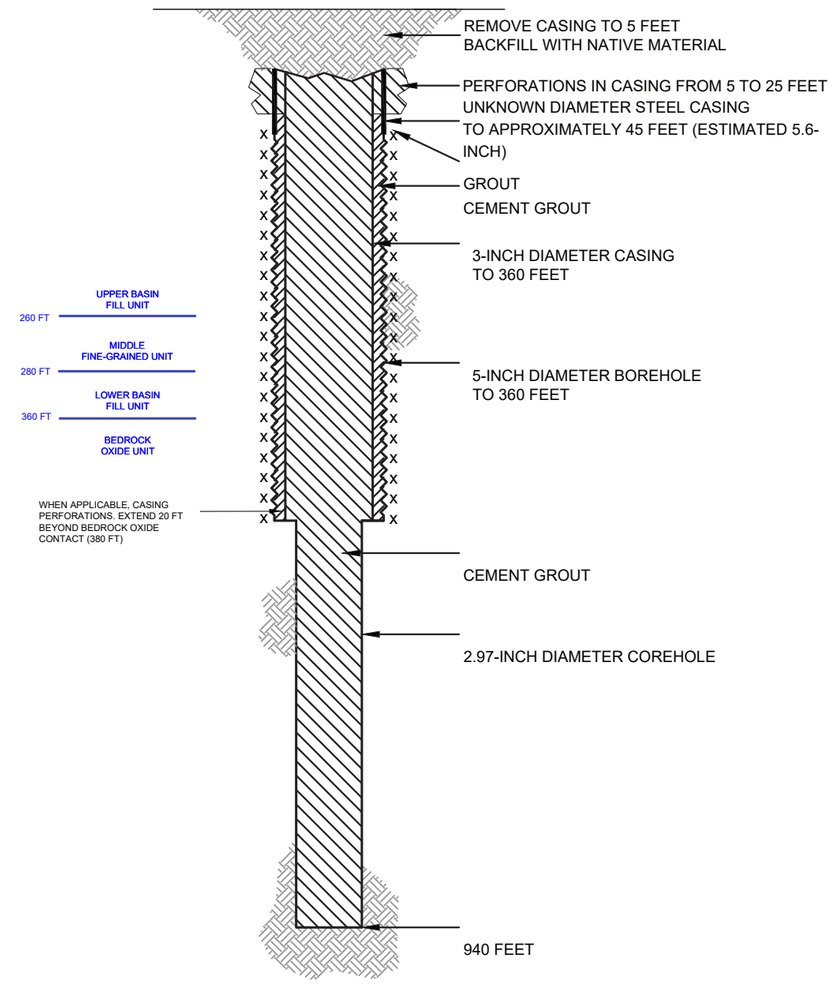
AS-BUILT COREHOLE 146MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 146MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 146MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		147MF

State	County
Arizona	Pinal

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

Latitude 33.04495925

Longitude -111.4257126

Surface Location

NW **1/4 of** NE **1/4 of Section** 33 **Township** 4S **Range** 9E

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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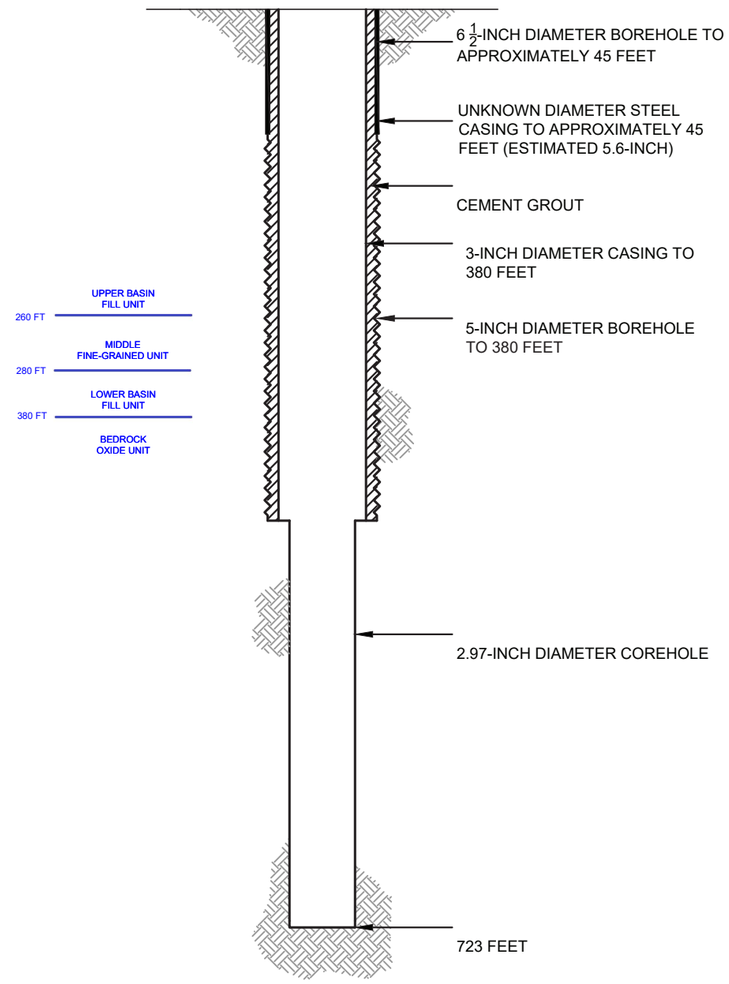
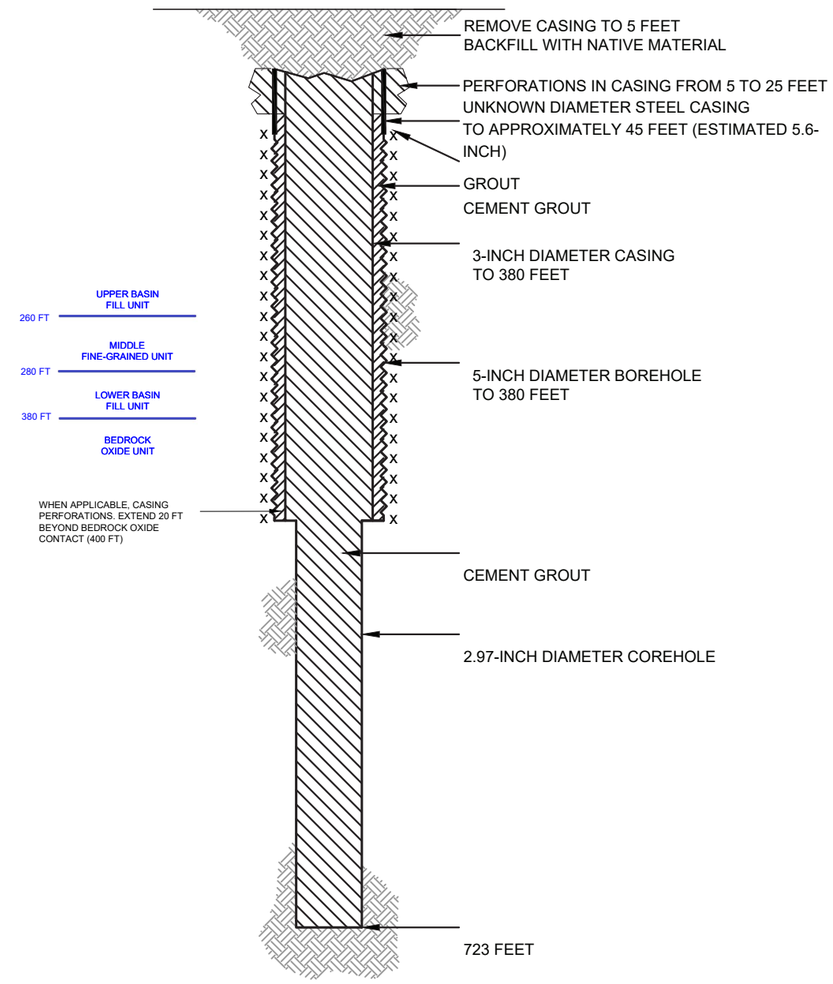
AS-BUILT COREHOLE 147MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 147MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 147MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		148MF

State	County
Arizona	Pinal

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

Latitude 33.0437866

Surface Location

NW **1/4 of** NE **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4281389

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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

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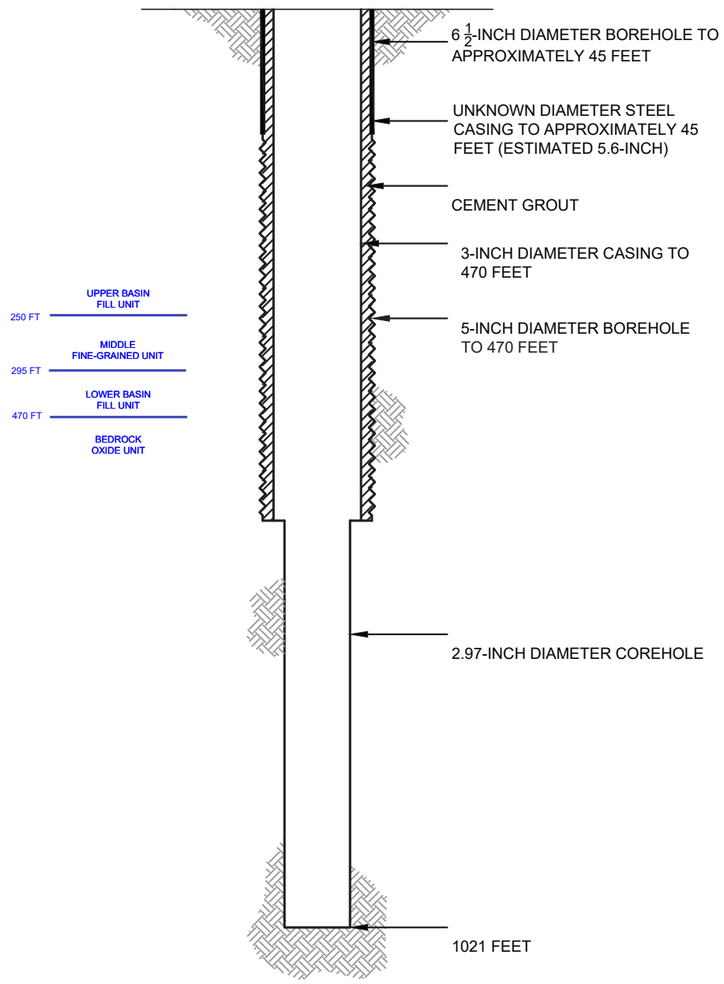
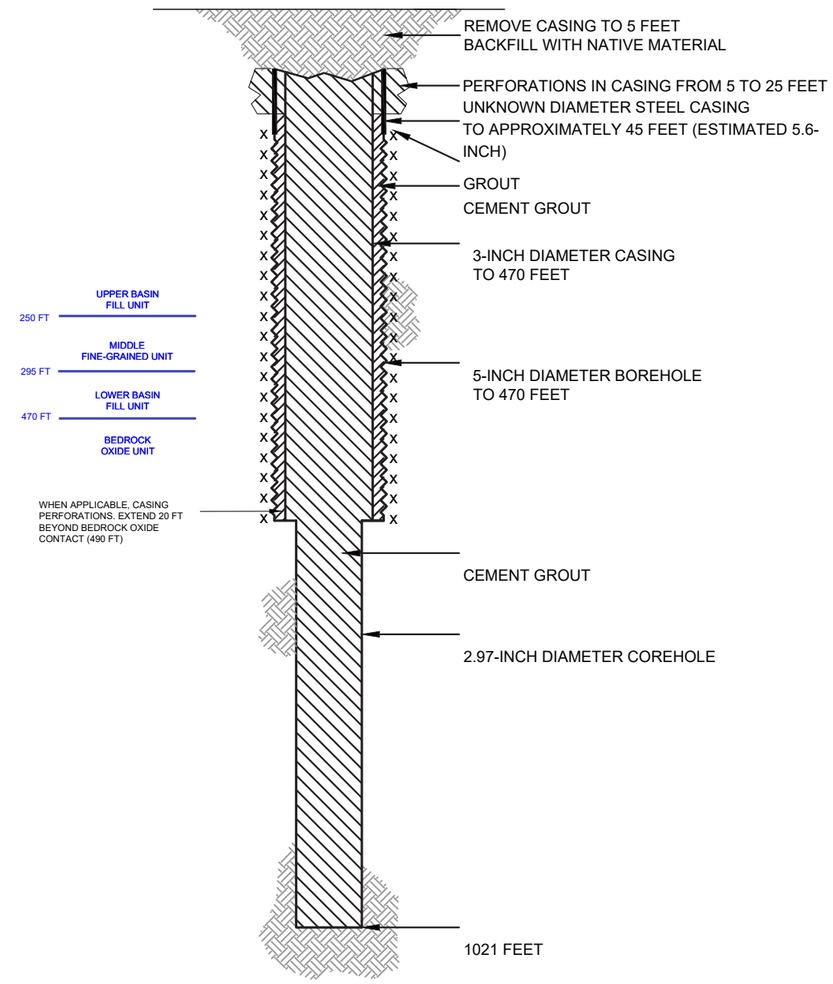
AS-BUILT COREHOLE 148MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 148MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 148MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		150S

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.05096195

Longitude -111.4363024

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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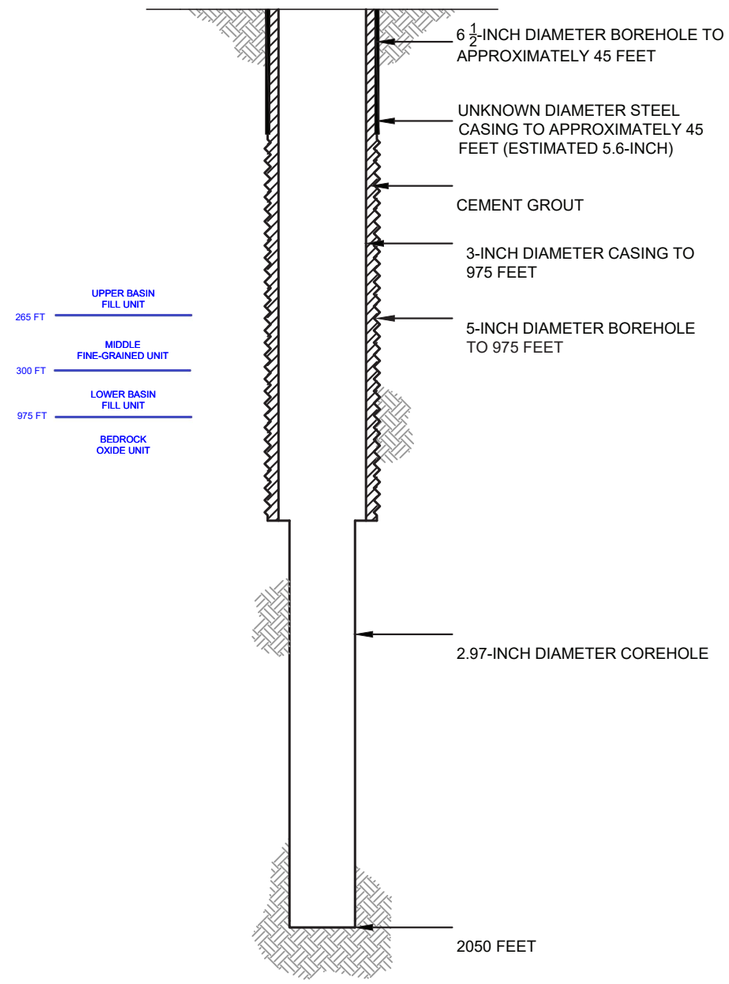
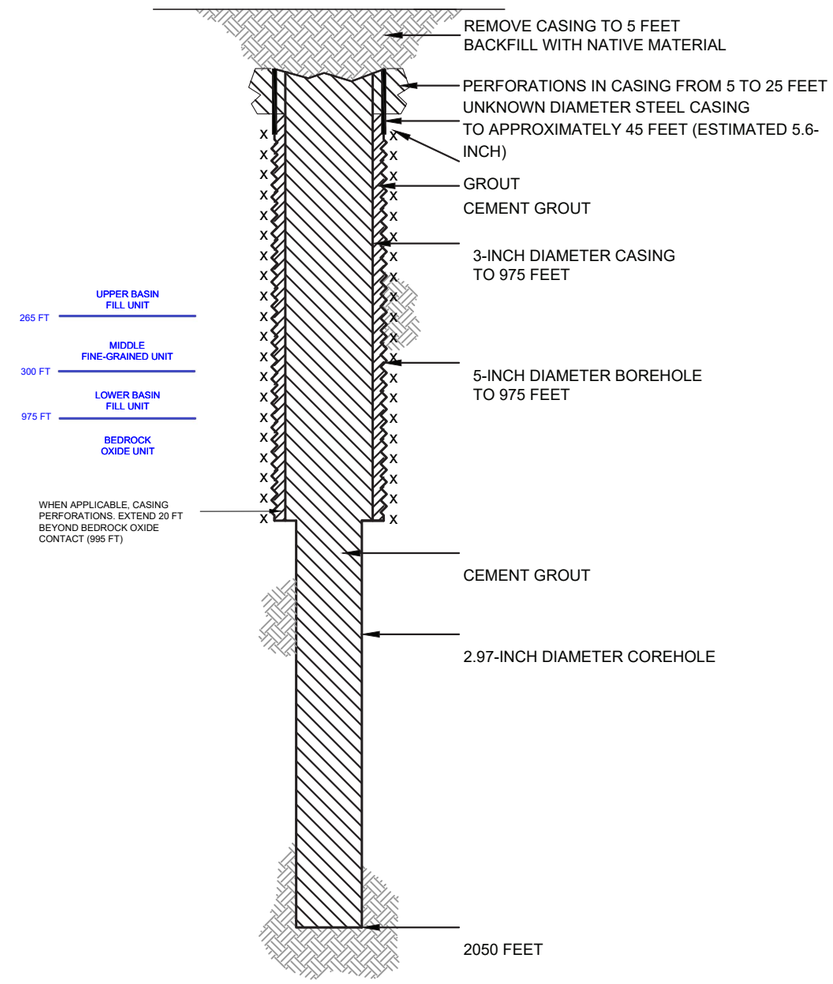
AS-BUILT COREHOLE 150S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 150S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 150S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		151

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.05335051

Longitude -111.4363064

_____ ft. from (N/S) _____ Line of quarter section

_____ ft. from (E/W) _____ Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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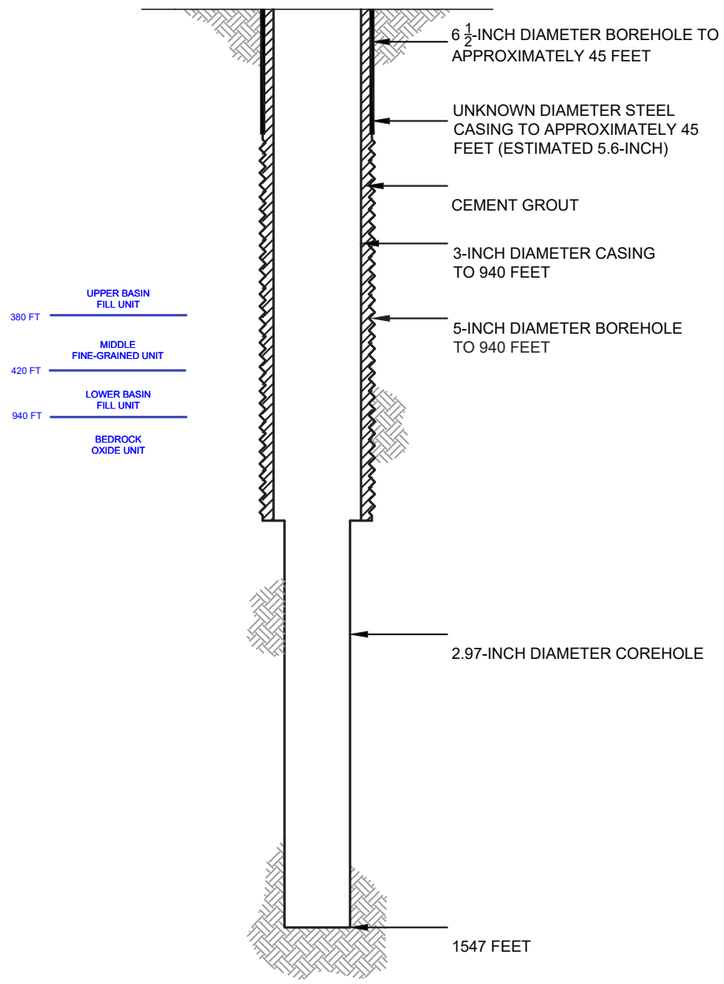
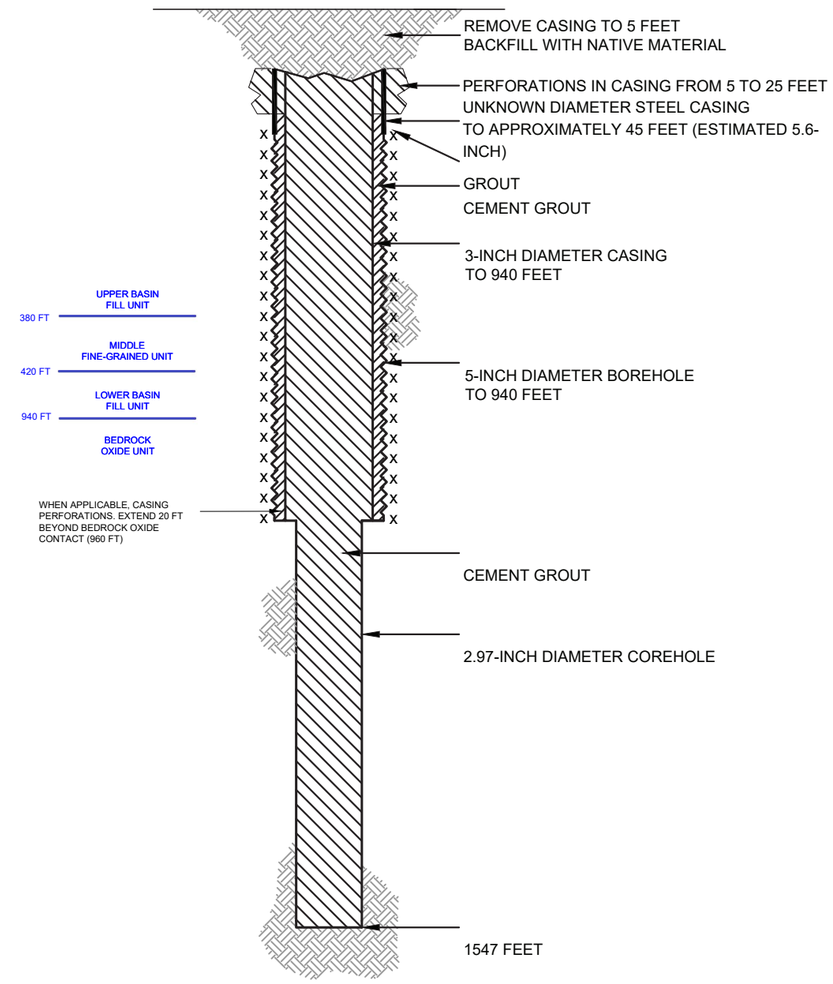
AS-BUILT COREHOLE 151



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 151



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 151 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		152

State	County
Arizona	Pinal

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

Latitude 33.05329794

Longitude -111.4264666

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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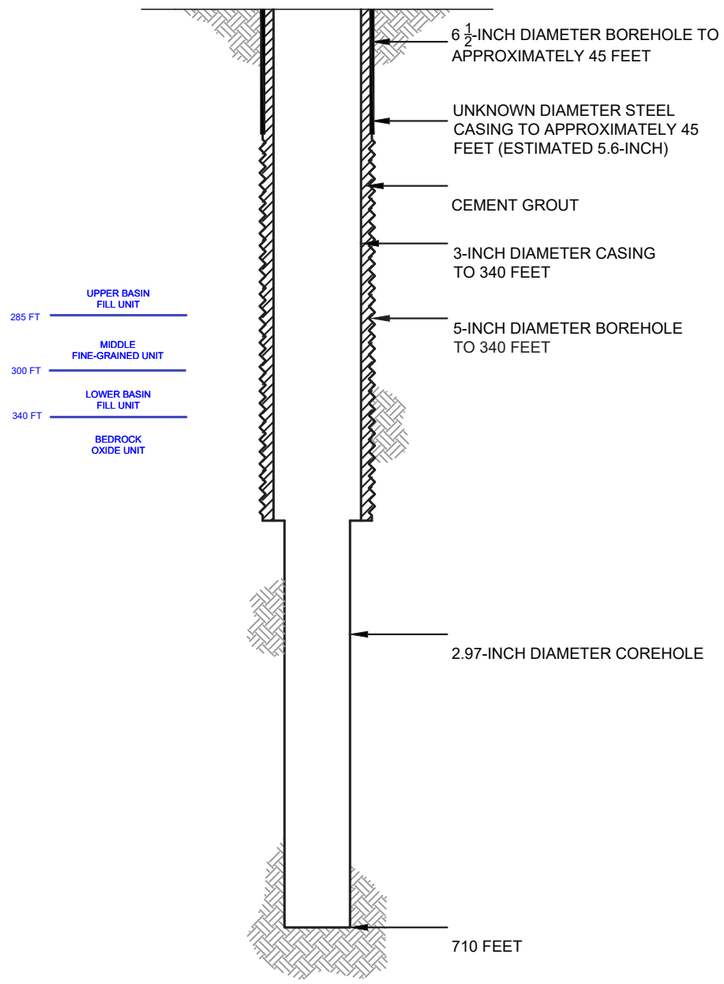
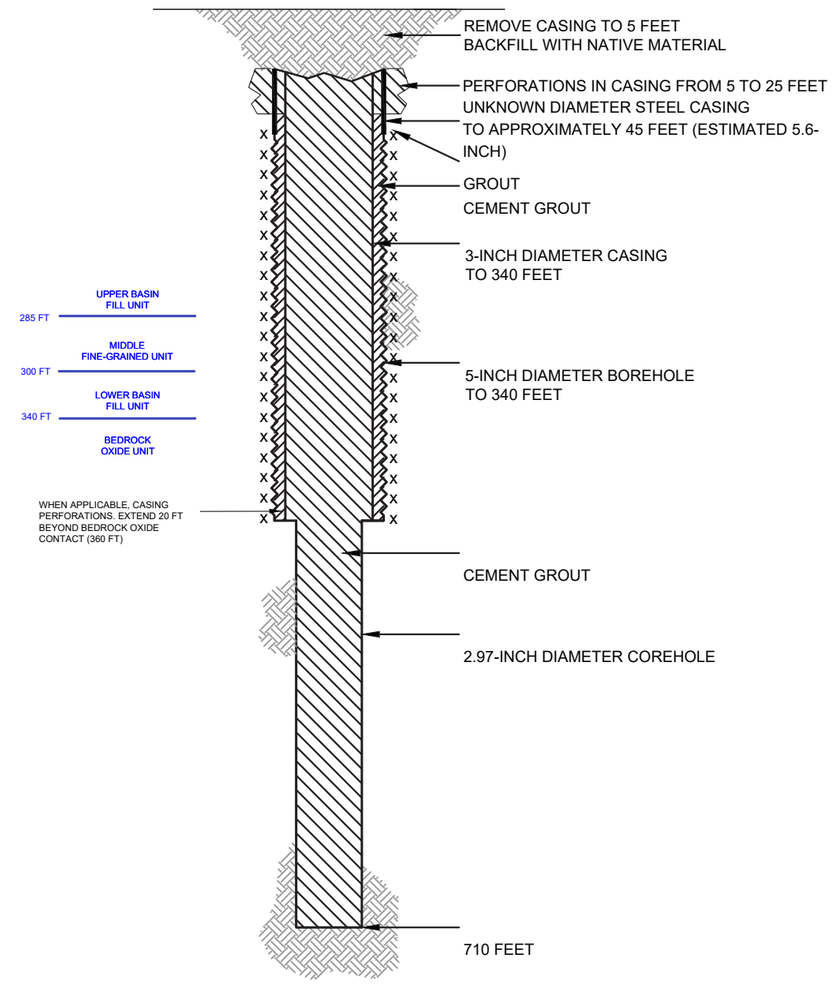
AS-BUILT COREHOLE 152



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 152



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 152 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		153

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.05335447

Longitude -111.4329924

_____ ft. from (N/S) _____ Line of quarter section

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Dan Johnson, VP - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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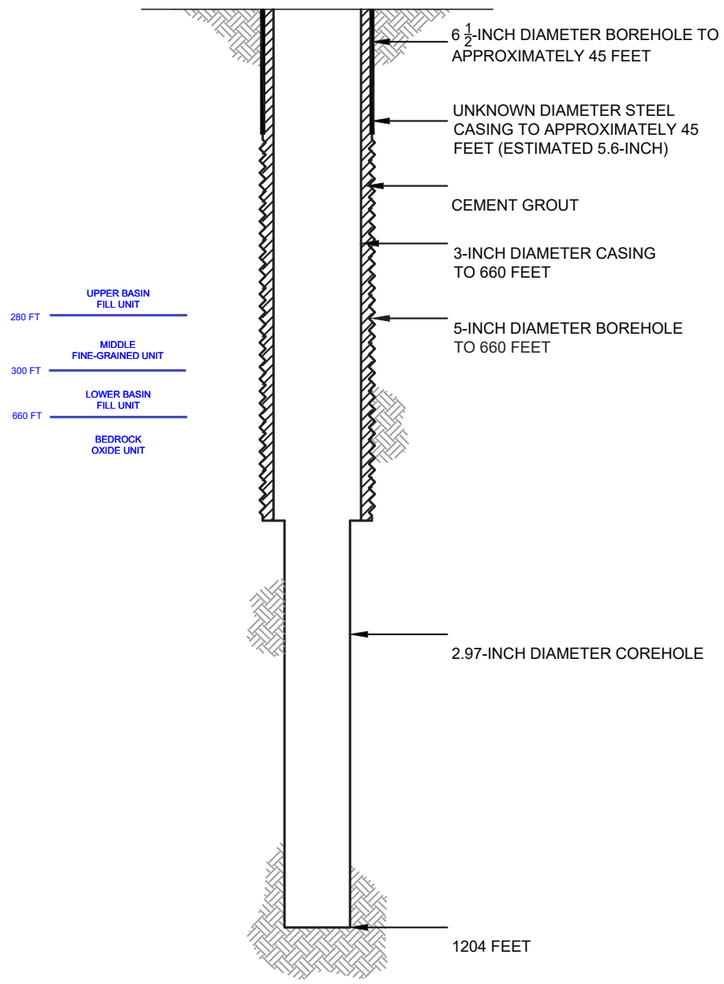
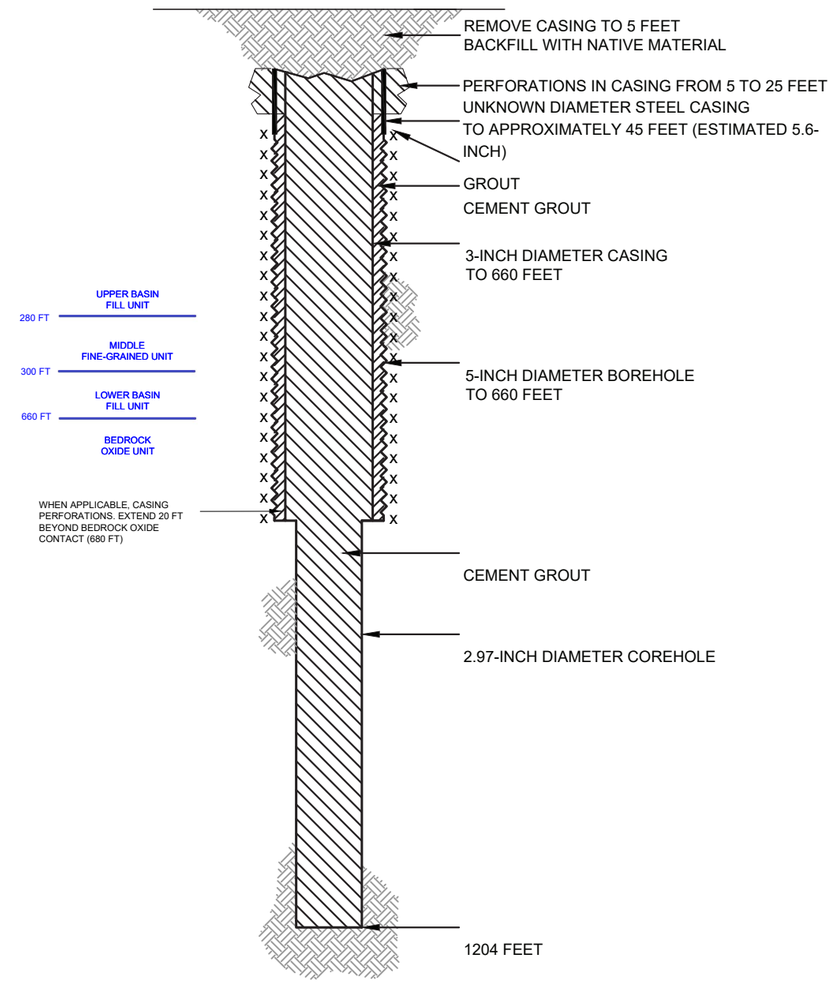
AS-BUILT COREHOLE 153



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 153



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 153 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		154S

State	County
Arizona	Pinal

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

Latitude 33.05091596

Longitude -111.4248542

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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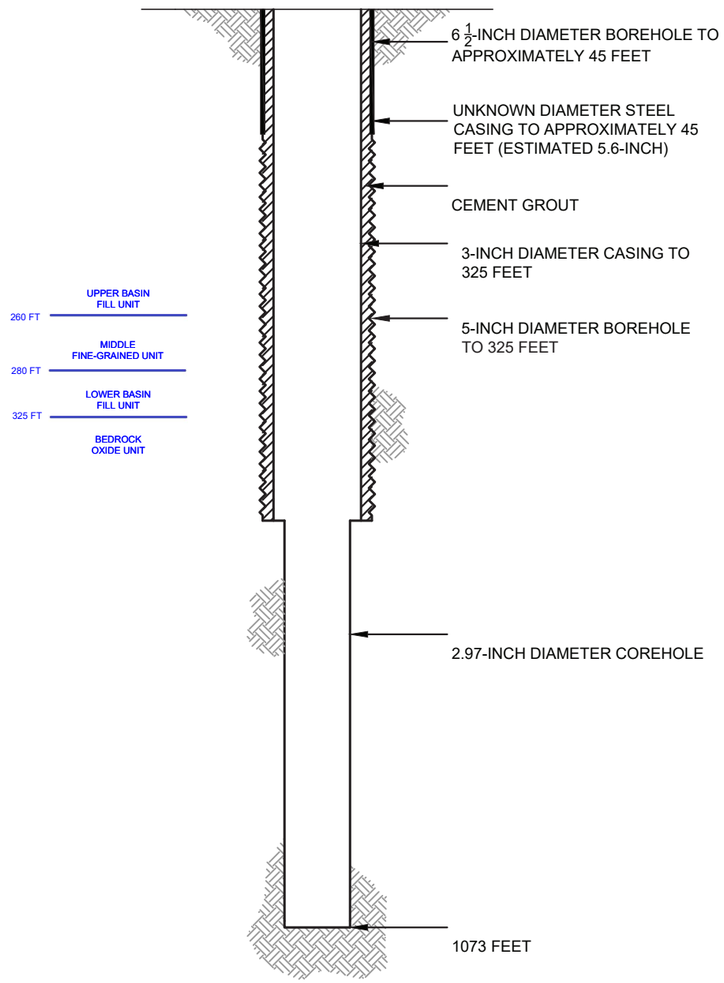
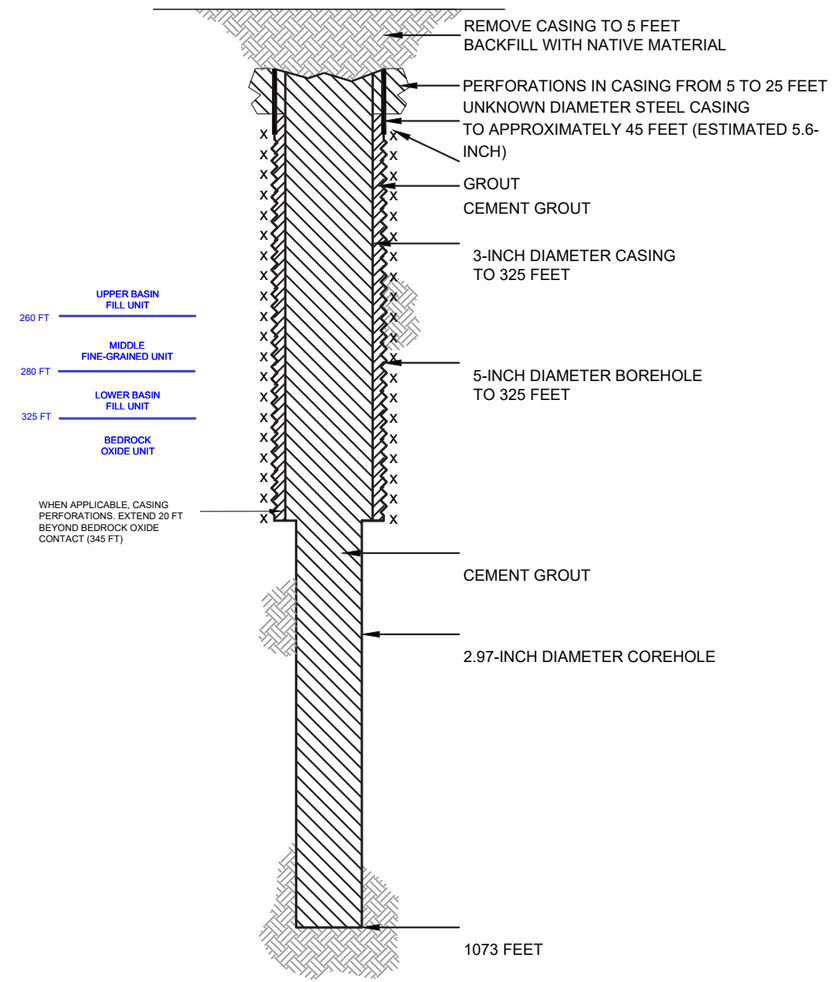
AS-BUILT COREHOLE 154S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 154S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 154S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		155S

State	County
Arizona	Pinal

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

Latitude 33.05089951

Surface Location

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

Longitude -111.4231928

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP - General Manager		10/3/2019

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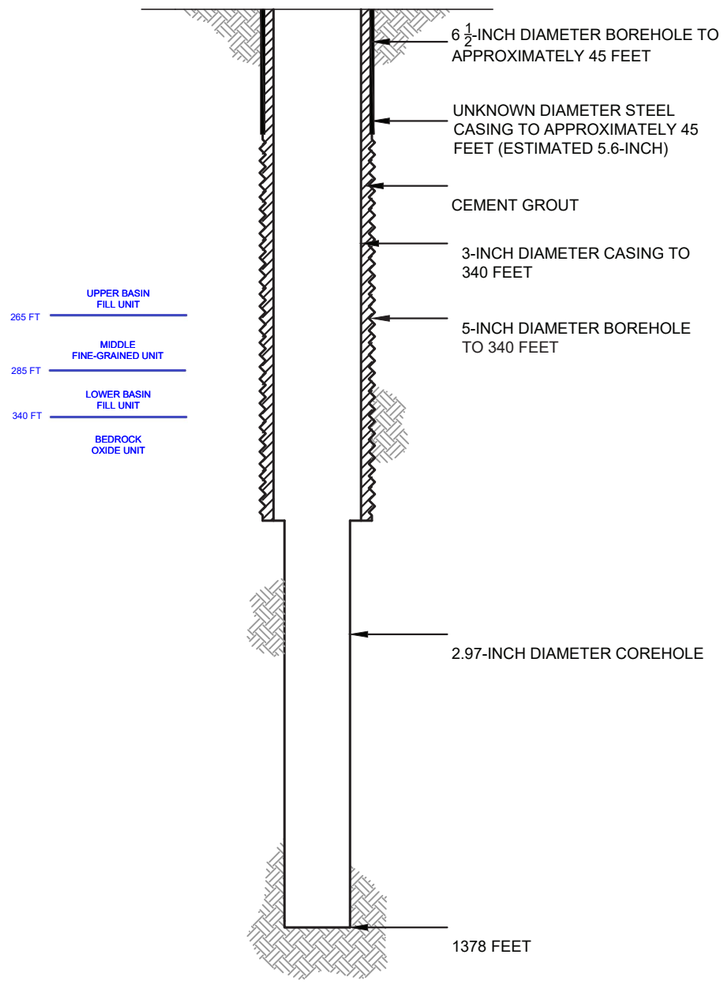
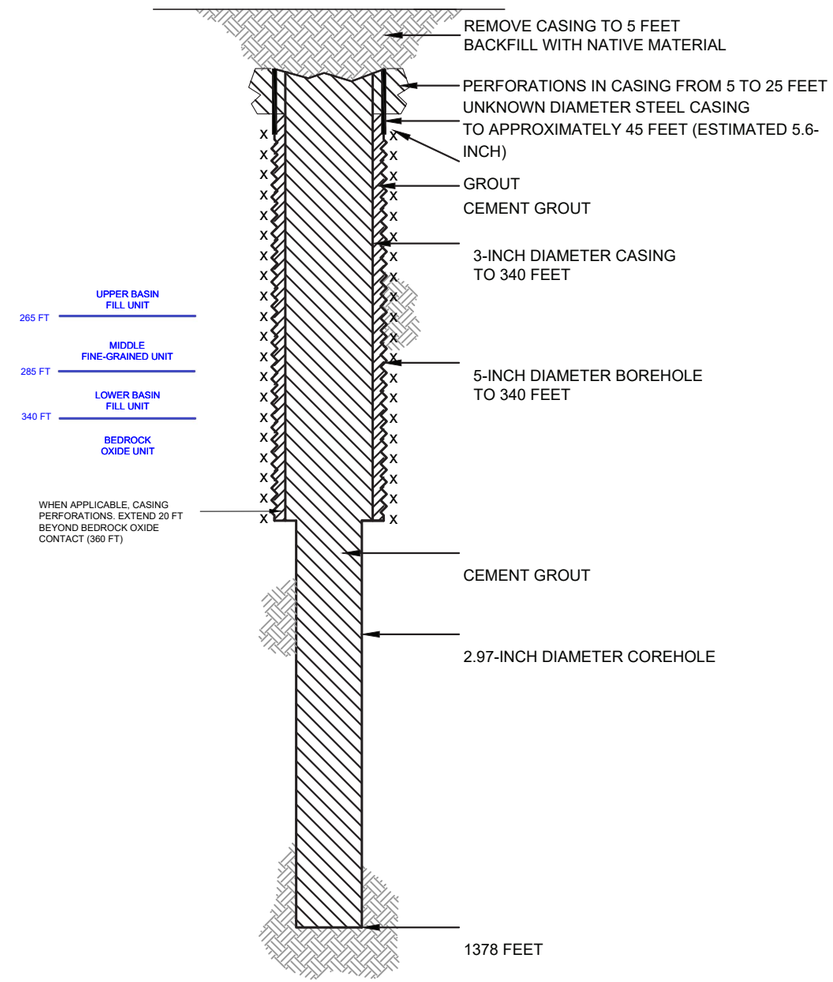
AS-BUILT COREHOLE 155S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 155S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 155S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		156S

State	County
Arizona	Pinal

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

Latitude 33.05210632

Longitude -111.4272816

Surface Location

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If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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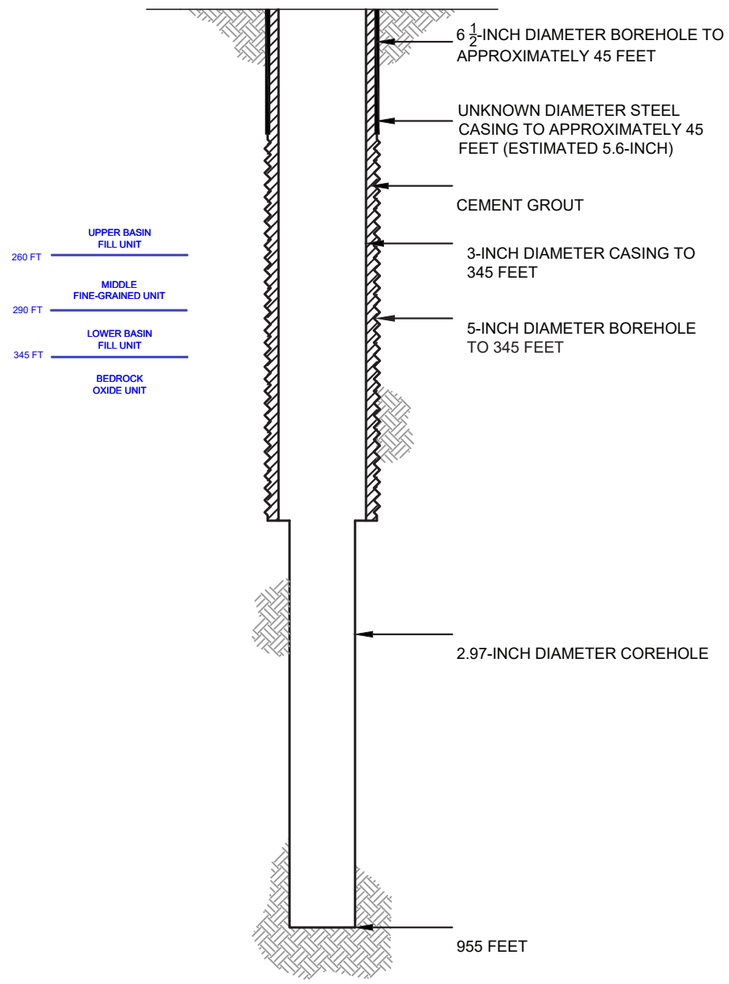
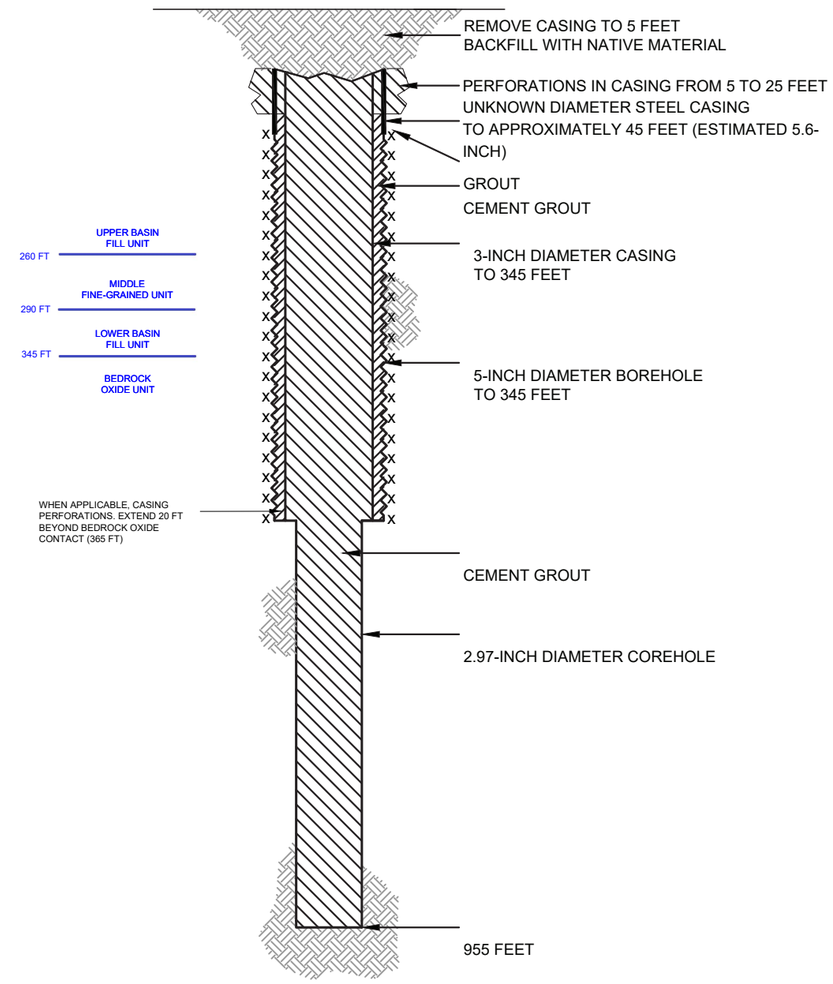
AS-BUILT COREHOLE 156S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 156S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 156S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		165MF

State	County
Arizona	Pinal

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

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.0438169

Longitude -111.4362971

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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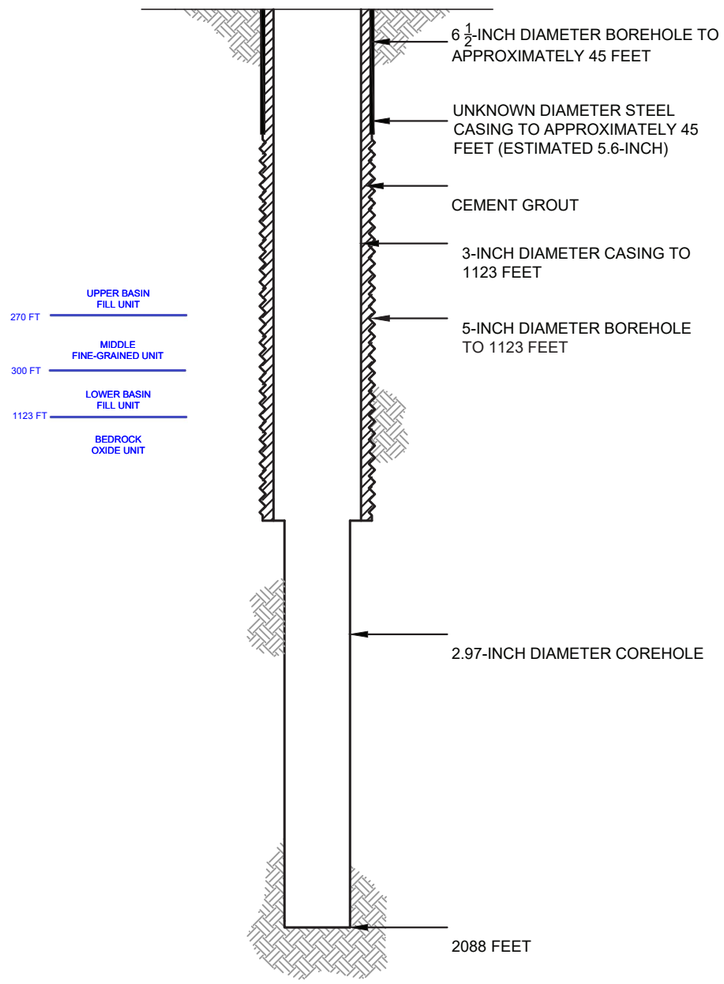
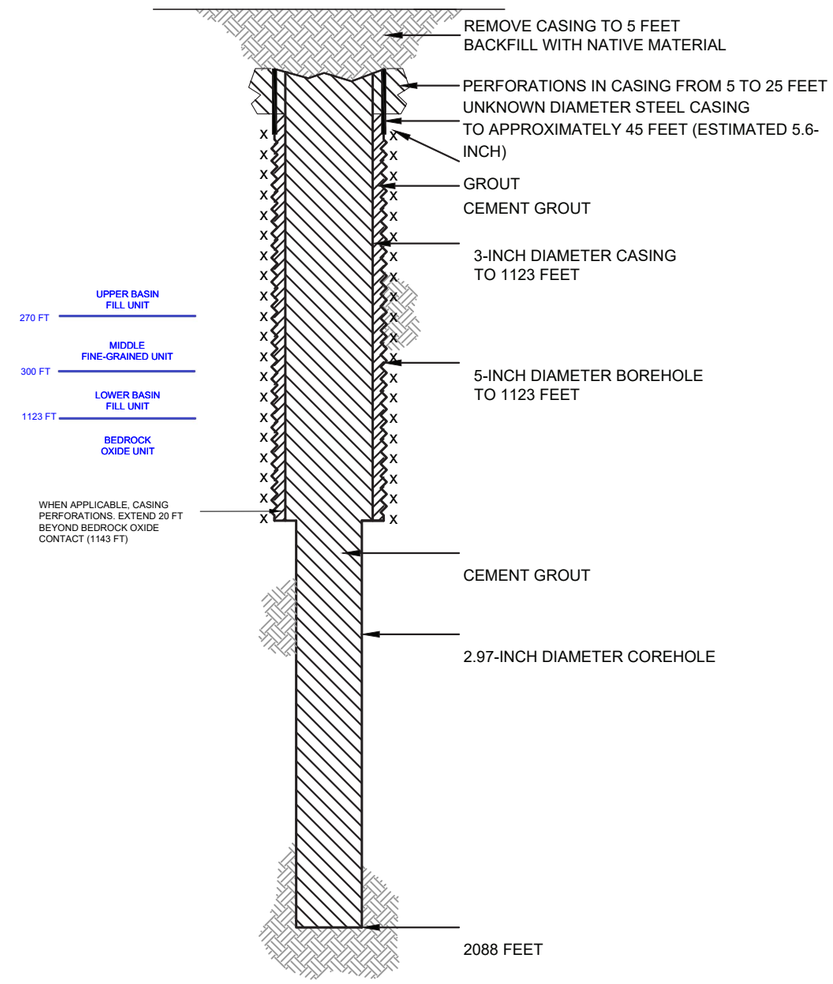
AS-BUILT COREHOLE 165MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 165MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 165MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		210

State	County
Arizona	Pinal

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

Latitude 33.05510572

Longitude -111.4361483

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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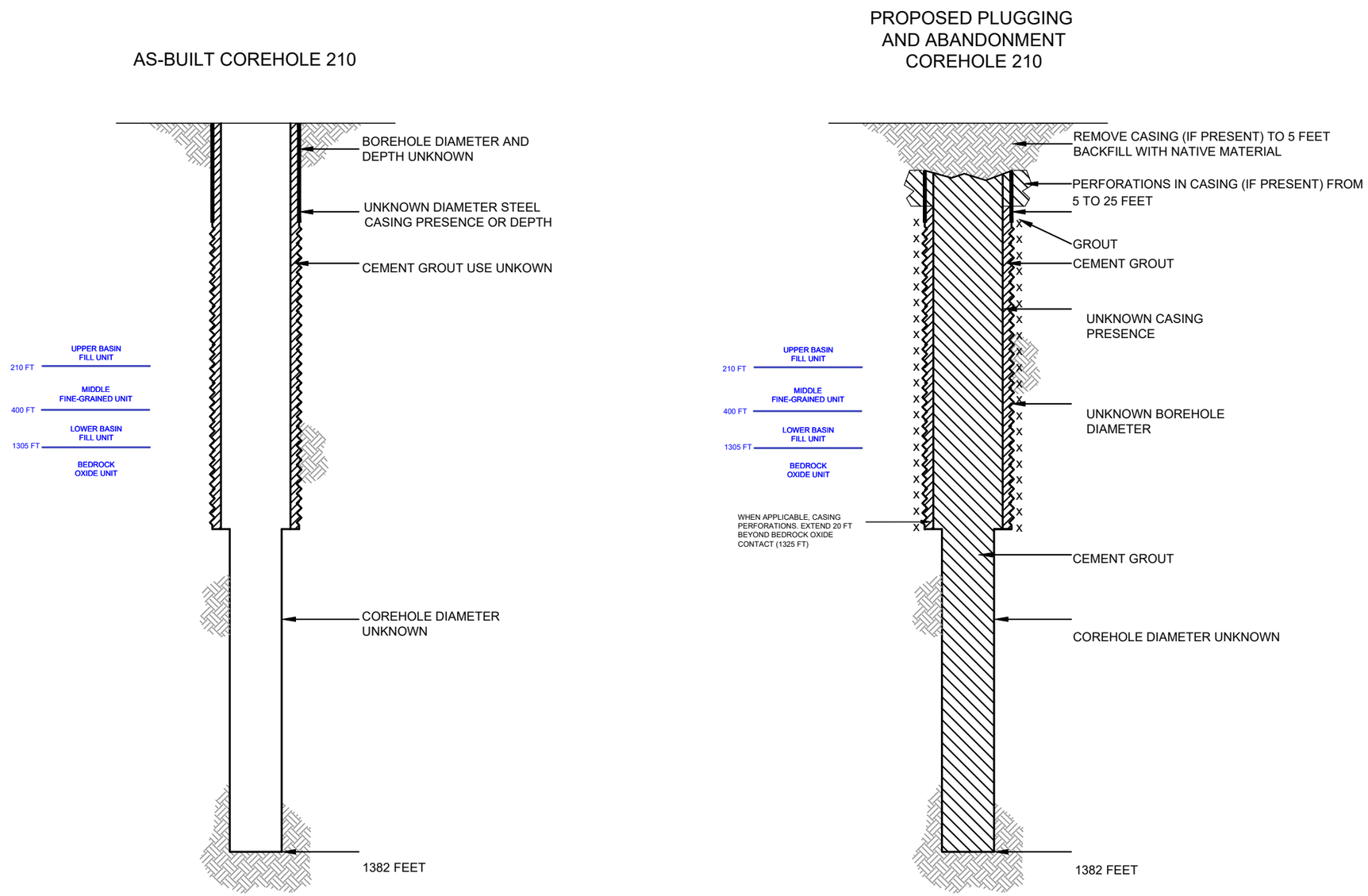

HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 210 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		254S

State	County
Arizona	Pinal

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

Latitude 33.05152912

Longitude -111.429321

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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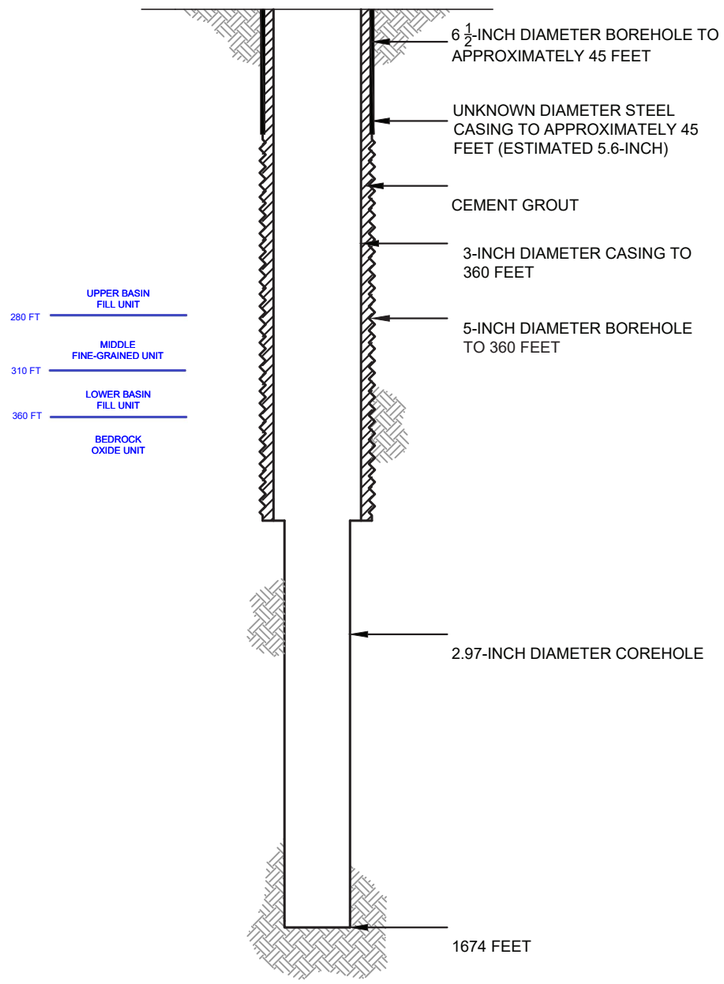
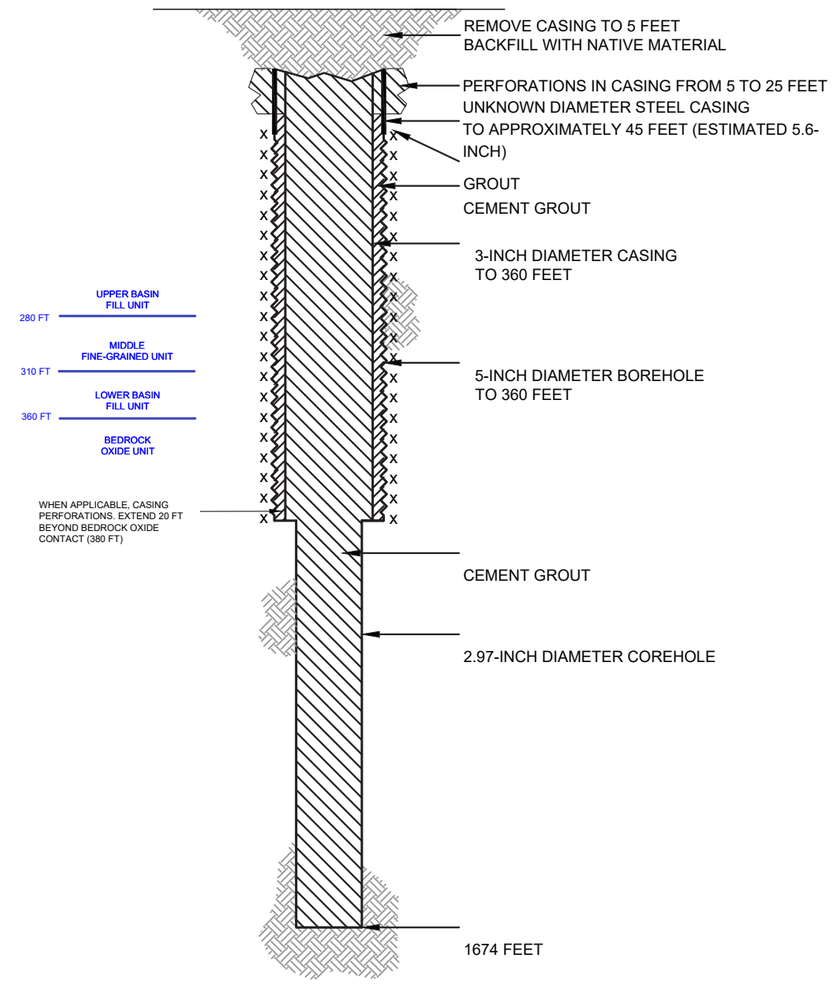
AS-BUILT COREHOLE 254S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 254S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 254S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		255S

State	County
Arizona	Pinal

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

Latitude 33.05212212

Longitude -111.4289313

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

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Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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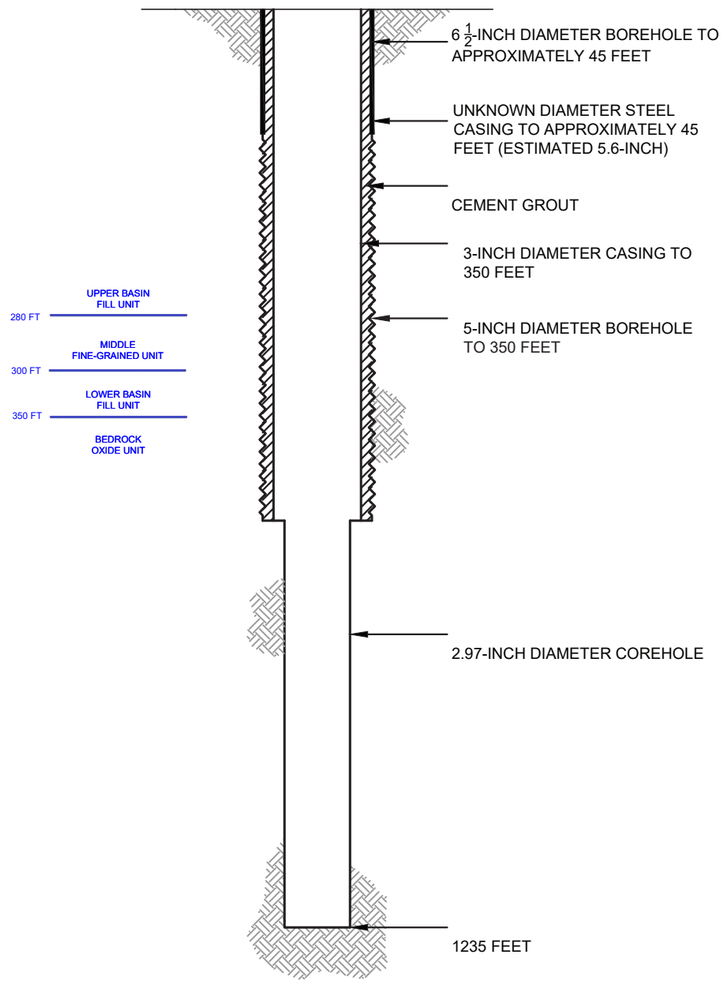
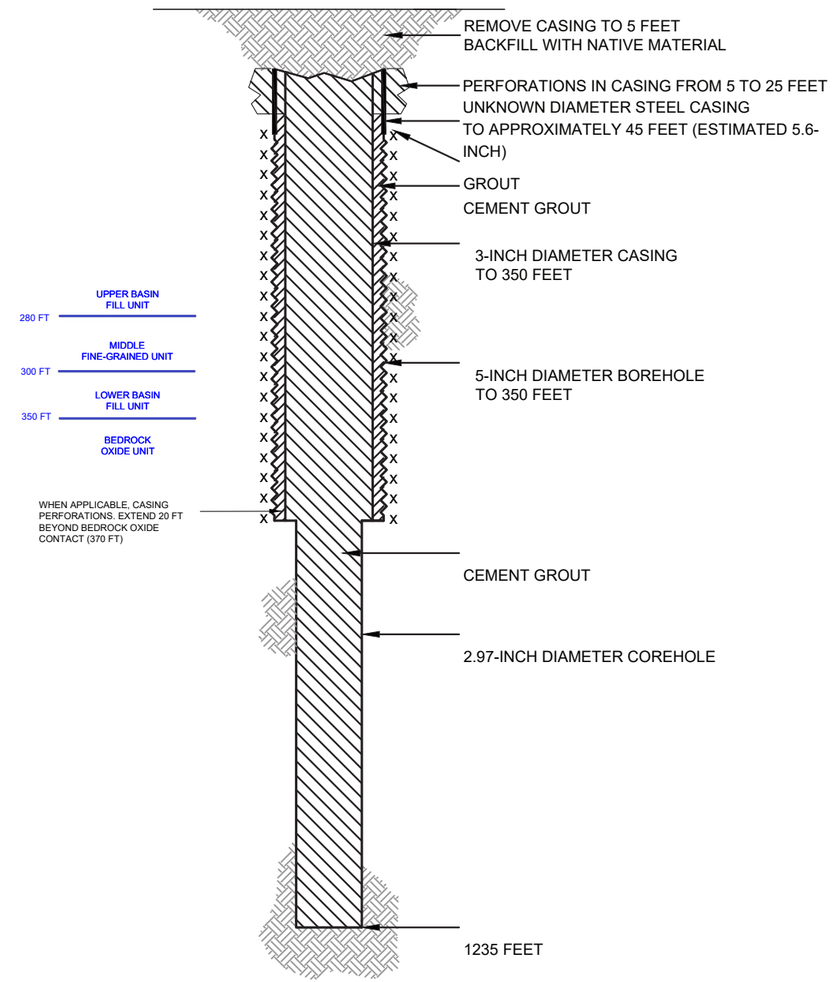
AS-BUILT COREHOLE 255S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 255S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 255S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

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Florence, AZ 85132

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R9UIC-AZ3-FY11-1		256S

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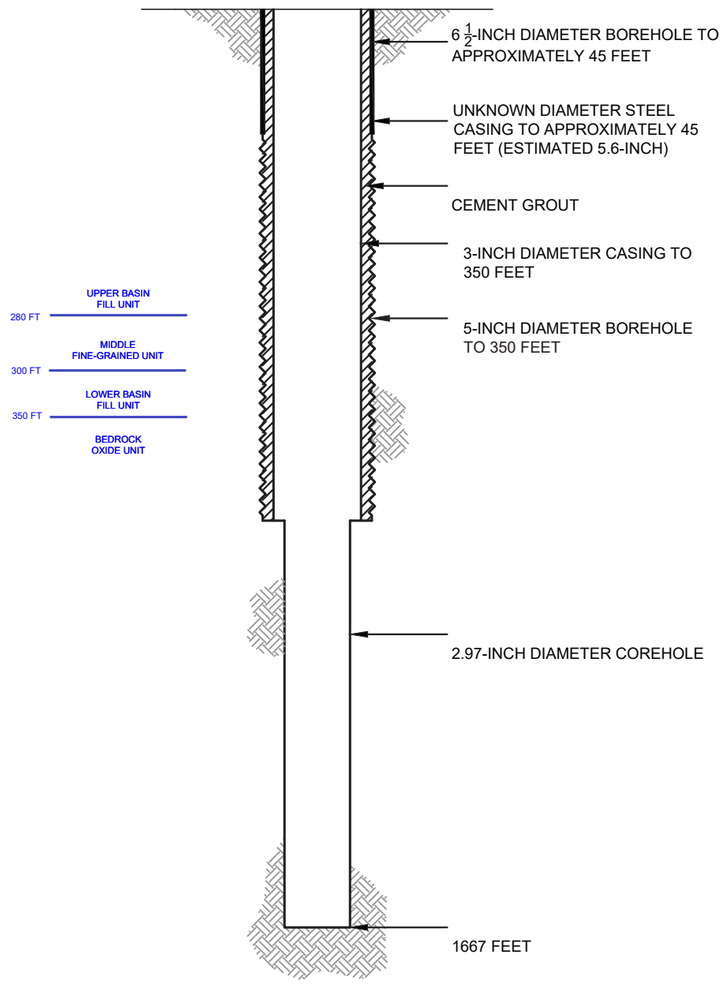
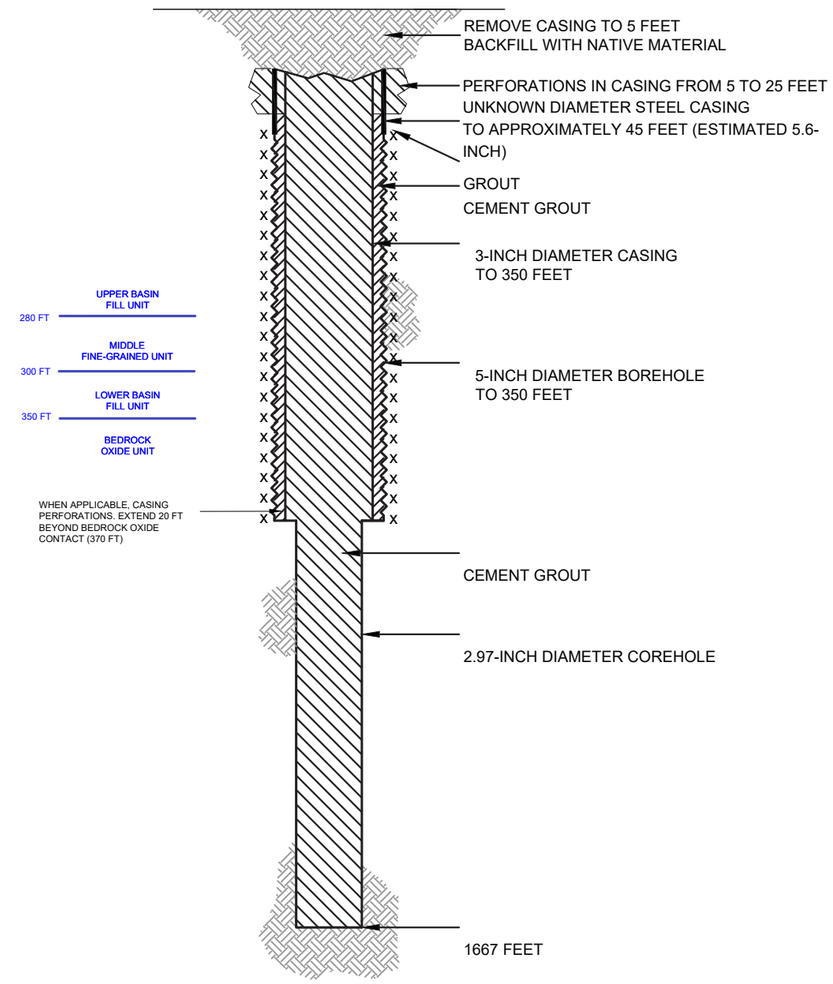
AS-BUILT COREHOLE 256S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 256S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 256S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		257S

State	County
Arizona	Pinal

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

Latitude 33.05033156

Longitude -111.4293246

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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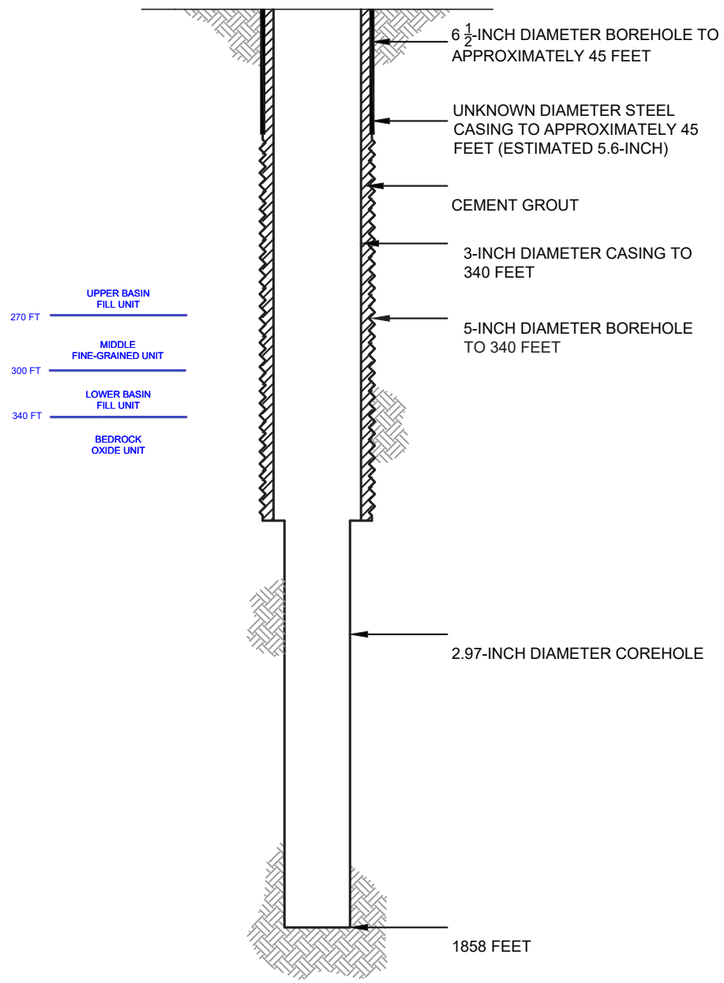
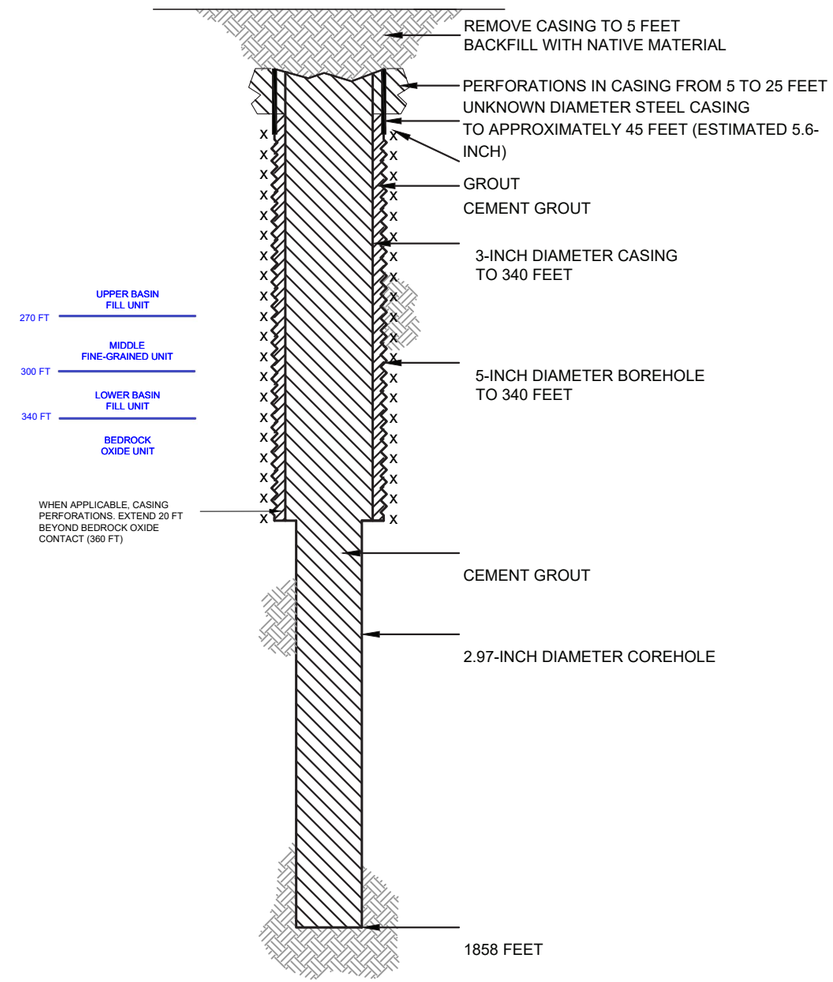
AS-BUILT COREHOLE 257S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 257S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 257S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		258S

State	County
Arizona	Pinal

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

Latitude 33.05151768

Longitude -111.4268913

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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

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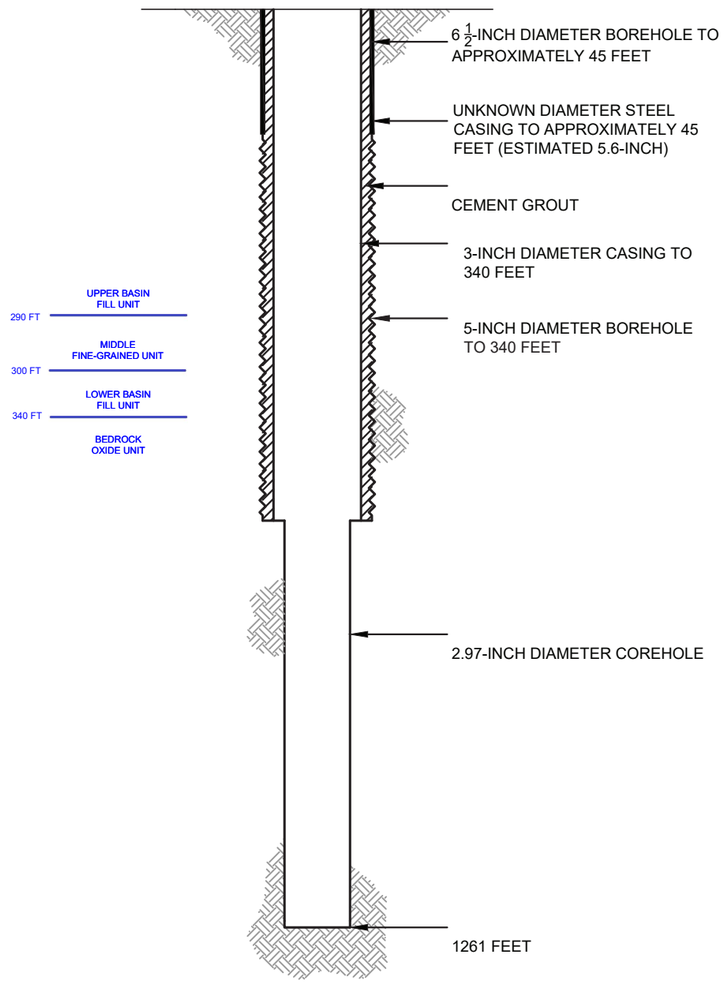
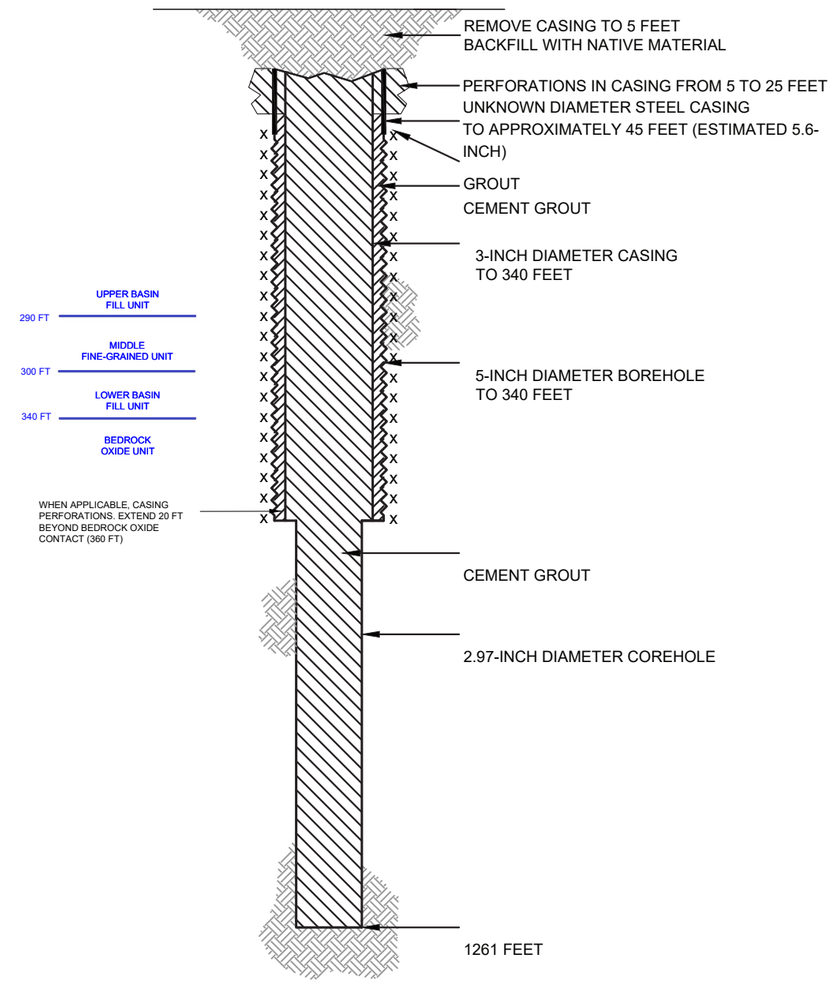
AS-BUILT COREHOLE 258S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 258S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 258S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		259S

State	County
Arizona	Pinal

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

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Longitude -111.427311

Surface Location

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_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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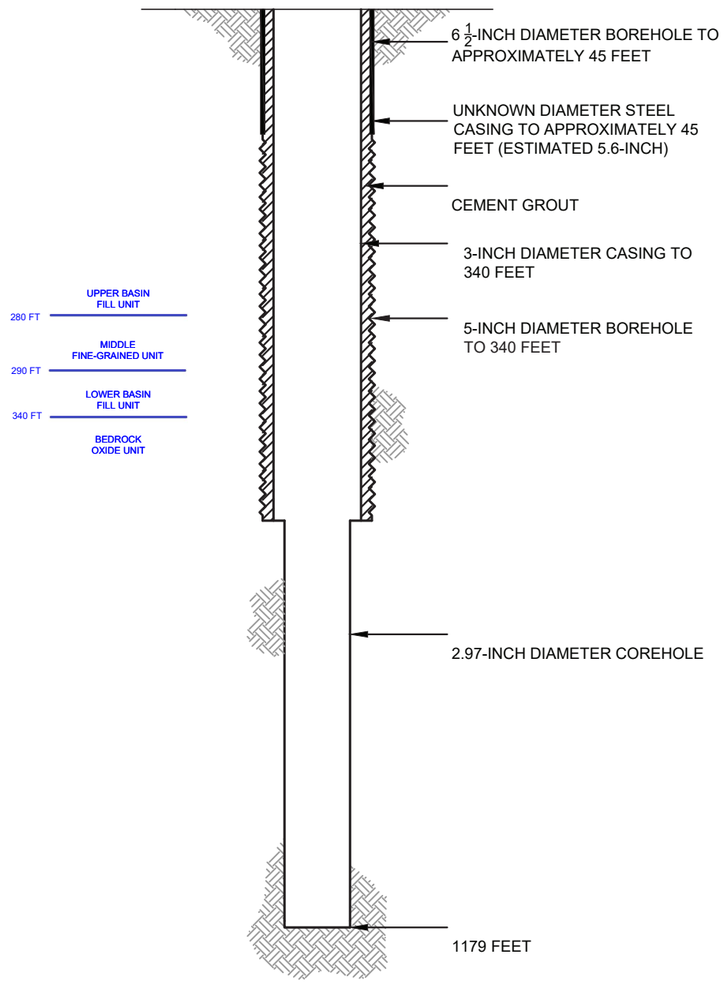
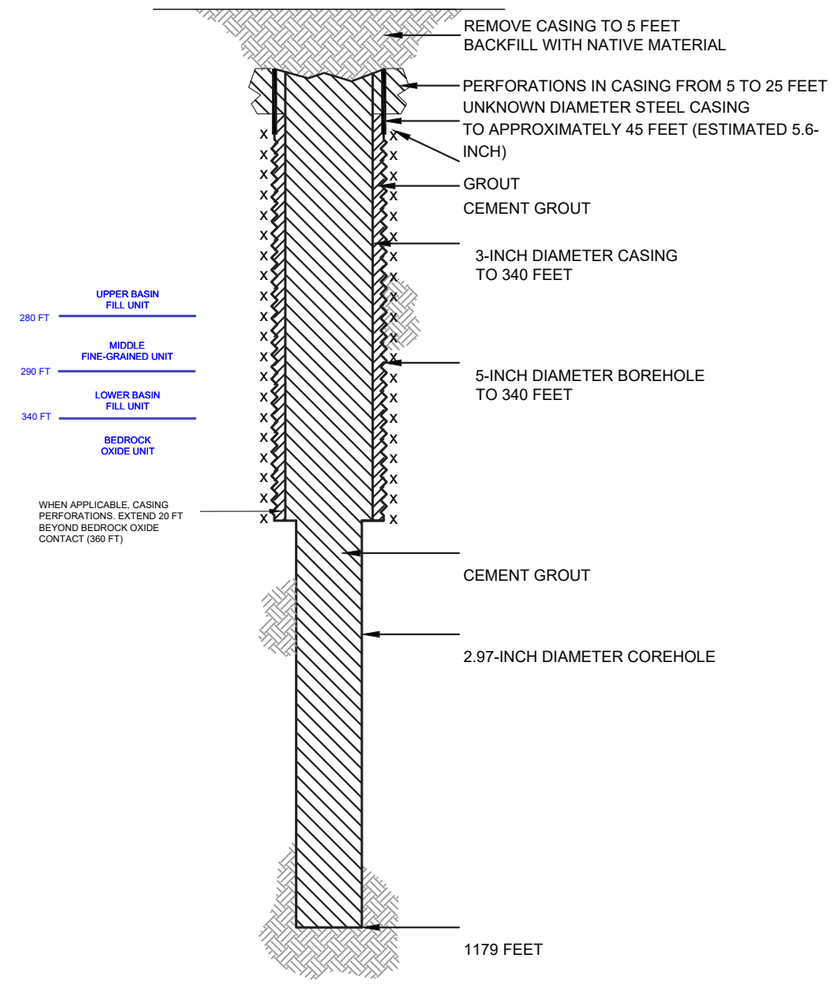
AS-BUILT COREHOLE 259S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 259S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 259S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		260

State	County
Arizona	Pinal

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

Latitude 33.05032997

Longitude -111.4277232

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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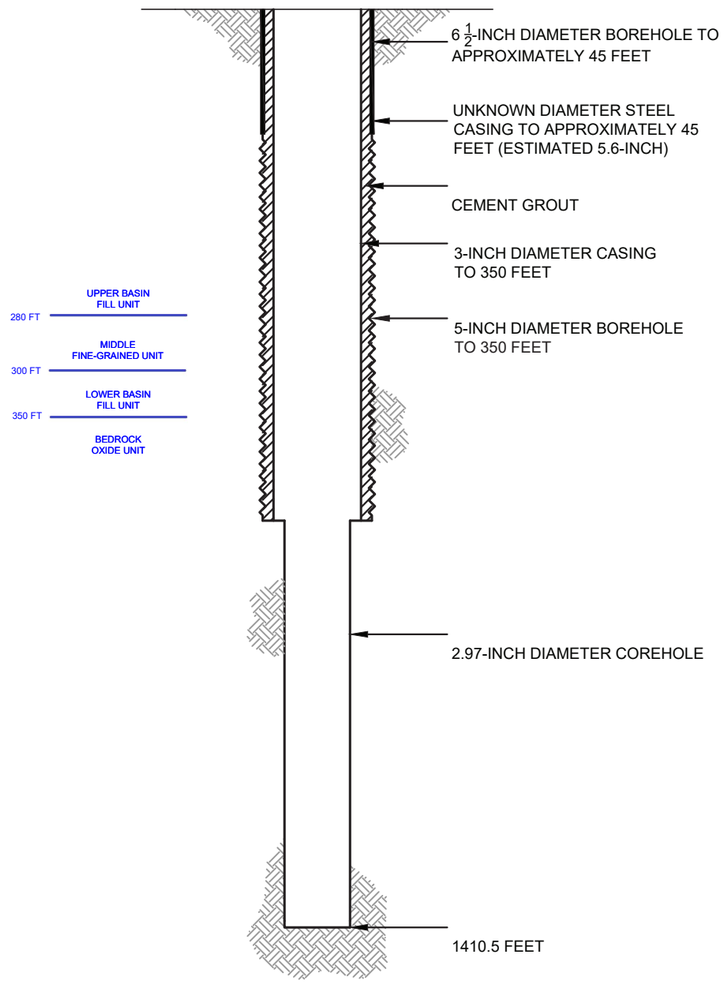
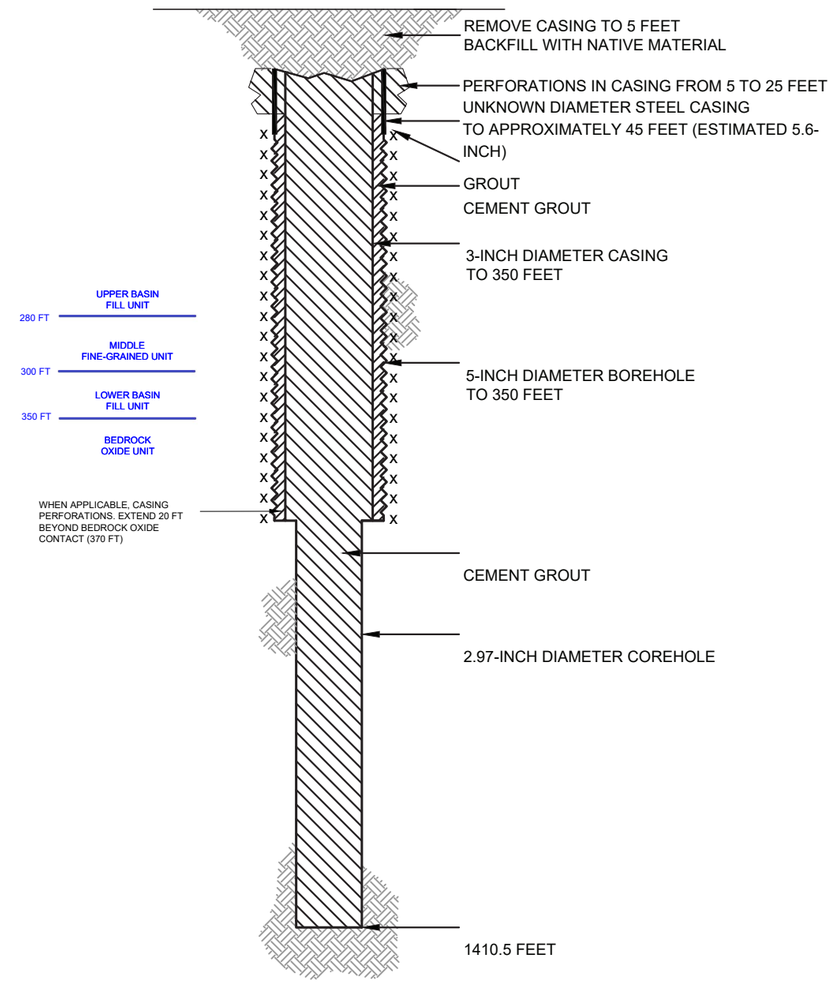
AS-BUILT COREHOLE 260



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 260



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 260 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		261S

State	County
Arizona	Pinal

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

Latitude 33.05032927

Longitude -111.4285261

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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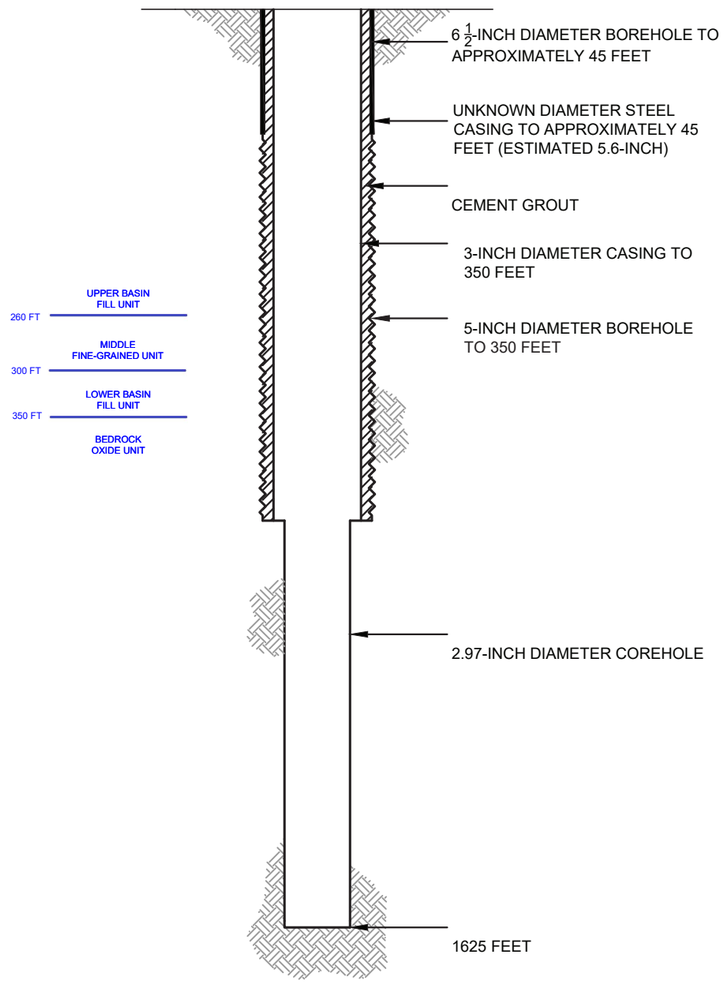
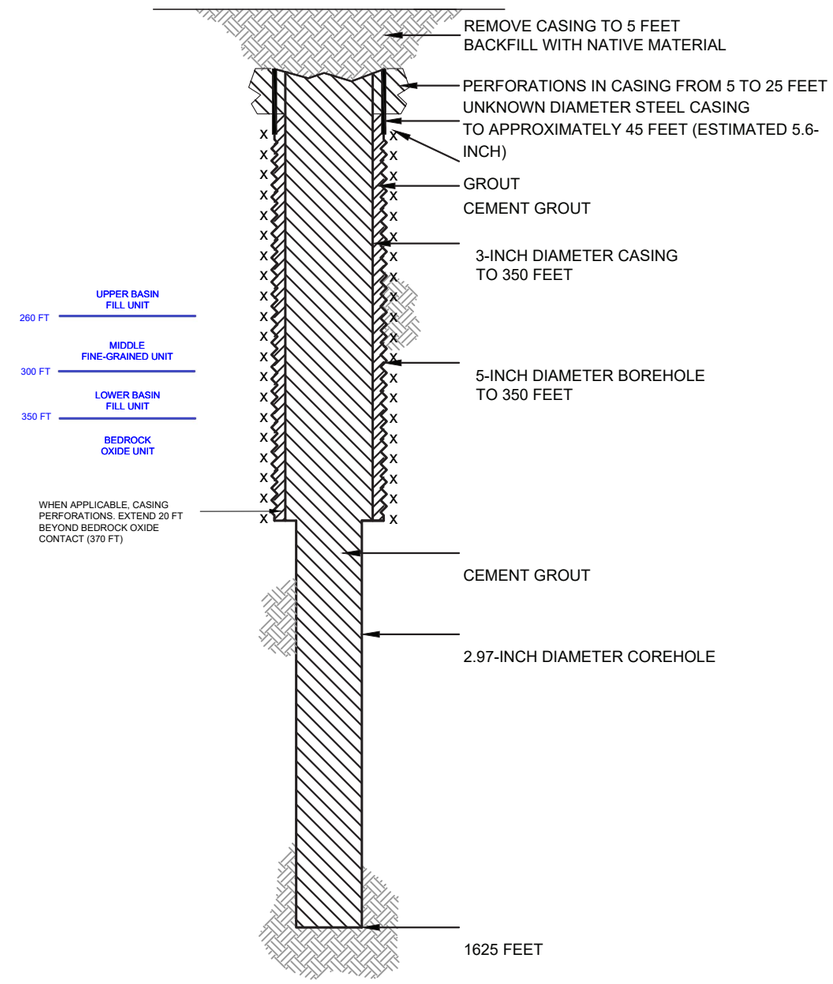
AS-BUILT COREHOLE 261S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 261S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 261S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		262S

State	County
Arizona	Pinal

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

Latitude 33.04974489

Longitude -111.4264889

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
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INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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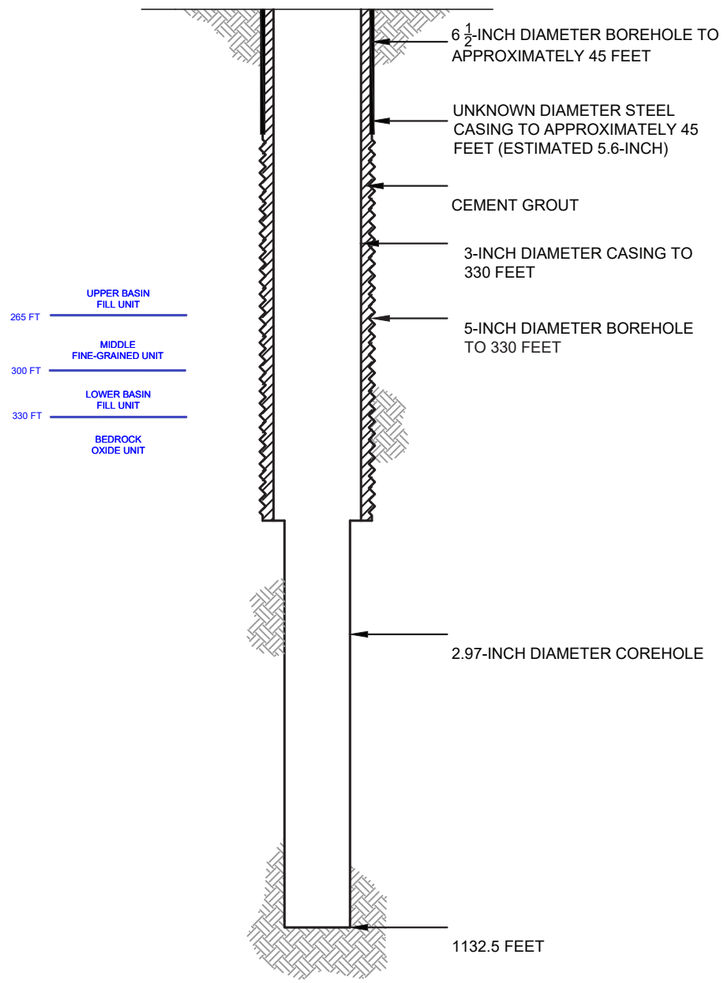
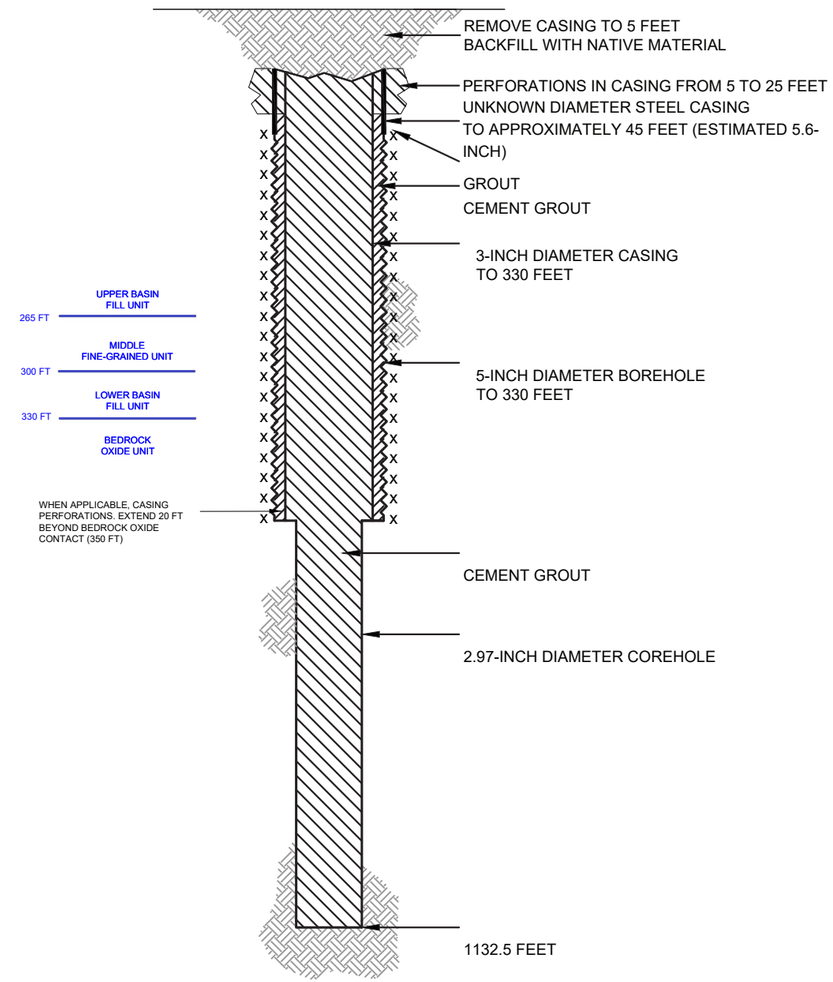
AS-BUILT COREHOLE 262S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 262S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 262S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		263MF

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.04914555

Longitude -111.4277118

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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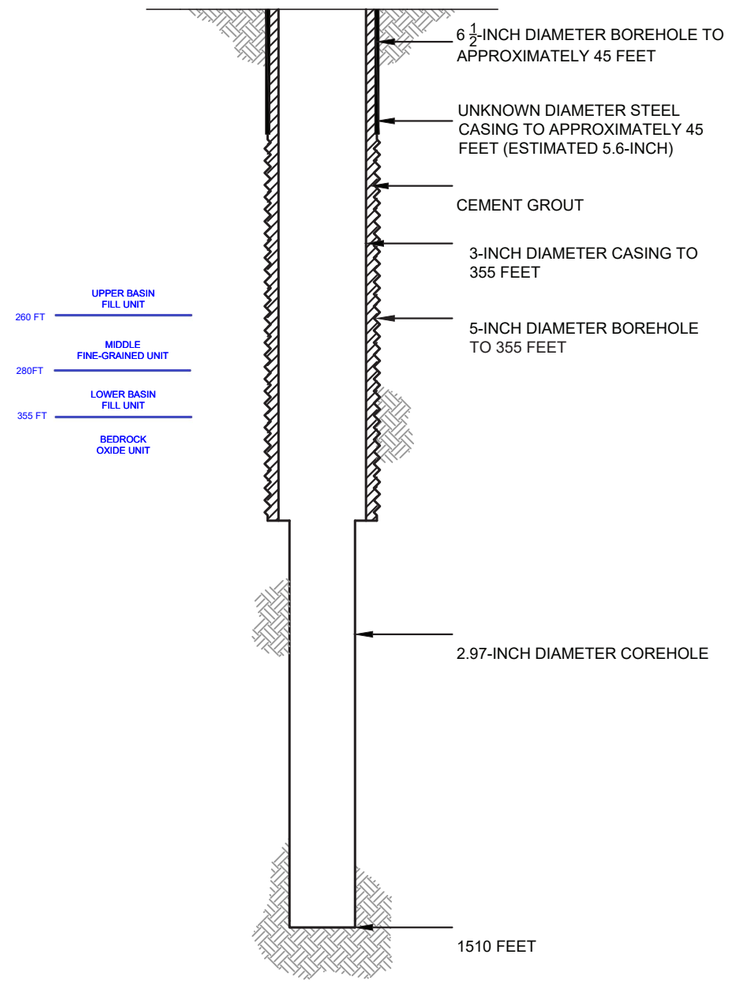
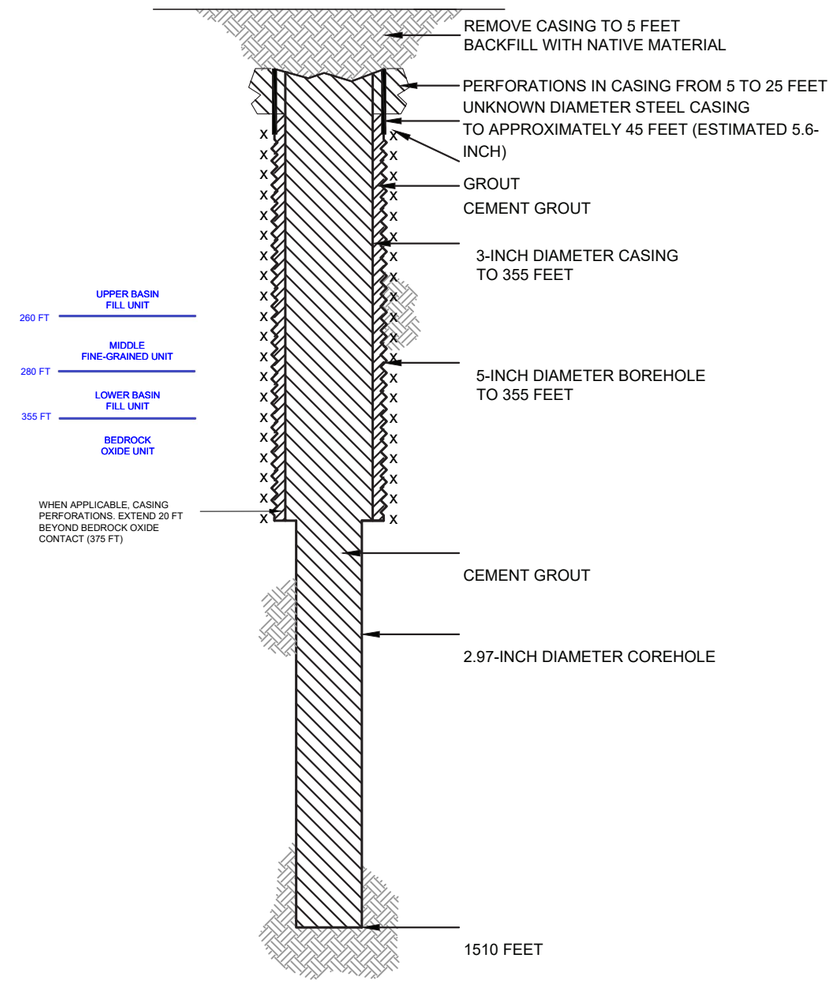
AS-BUILT COREHOLE 263MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 263MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 263MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		264MF

State	County
Arizona	Pinal

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

Latitude 33.04855332

Longitude -111.4273156

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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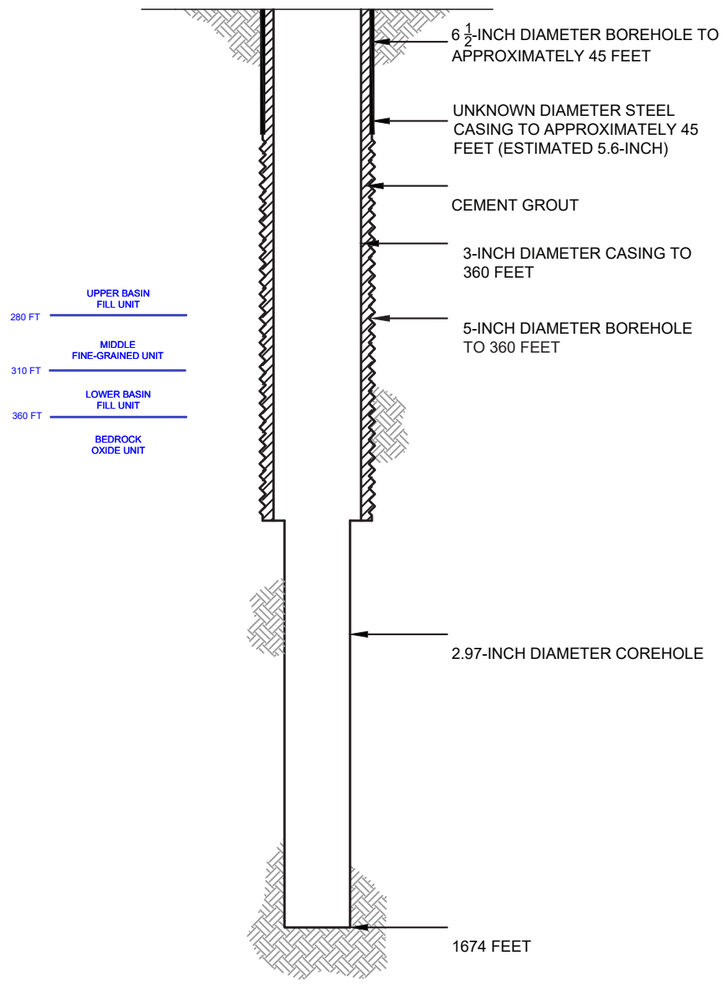
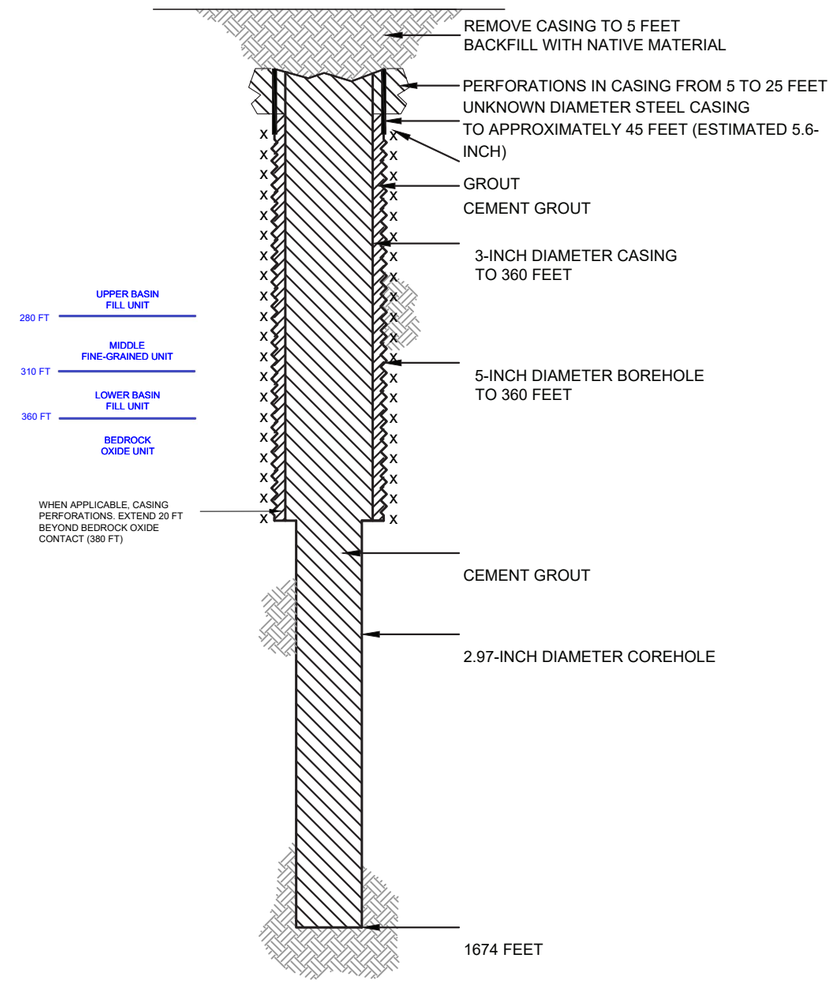
AS-BUILT COREHOLE 254S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 254S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 254S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		265MF

State	County
Arizona	Pinal

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

Latitude 33.04795165

Longitude -111.426897

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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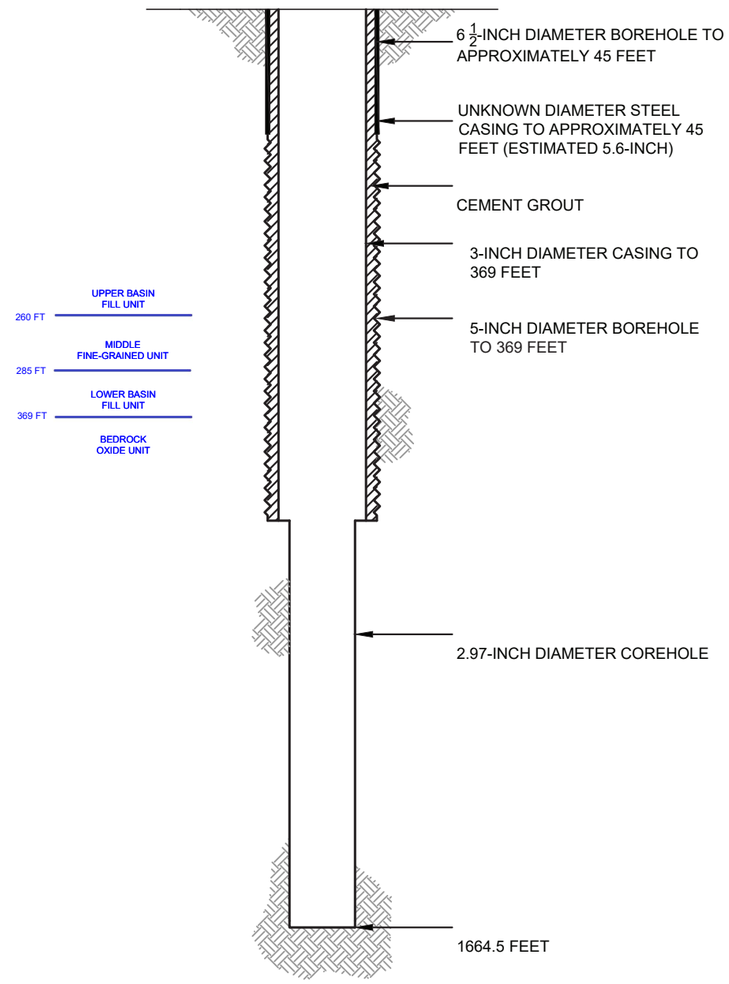
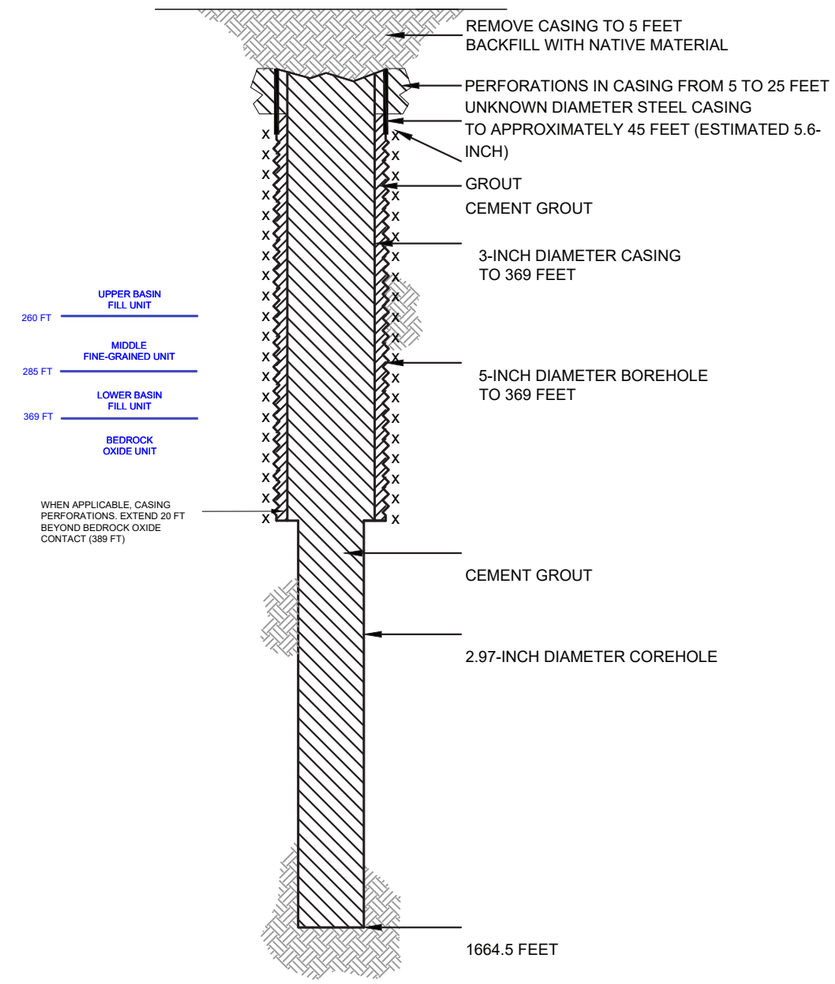
AS-BUILT COREHOLE 265MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 265MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 265MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		266S

State	County
Arizona	Pinal

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

Latitude 33.04974386

Longitude -111.4281164

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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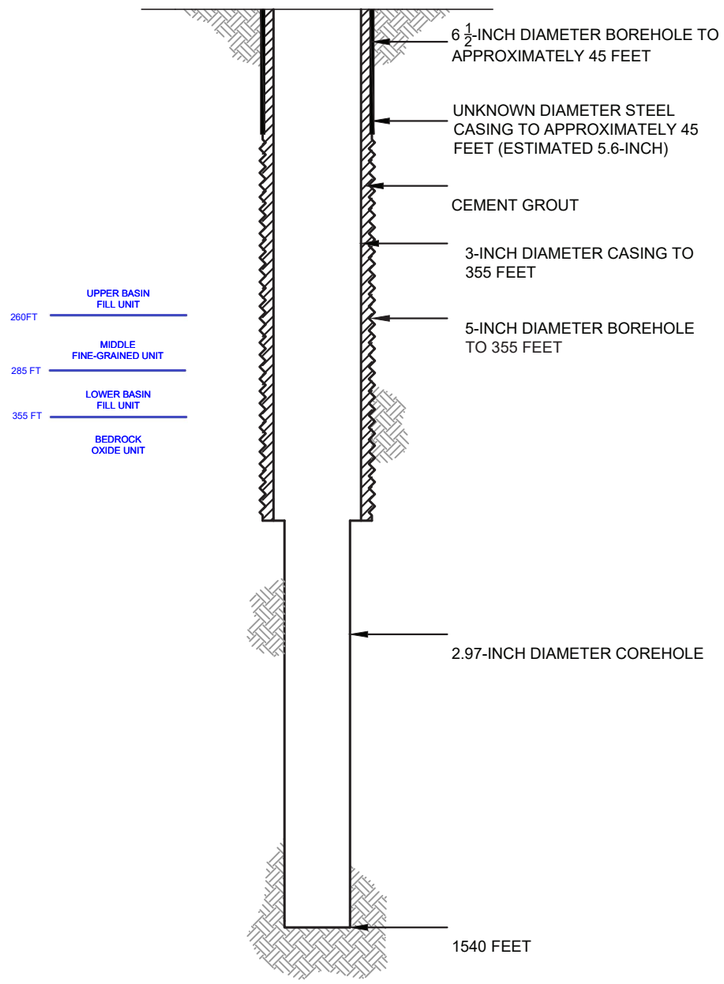
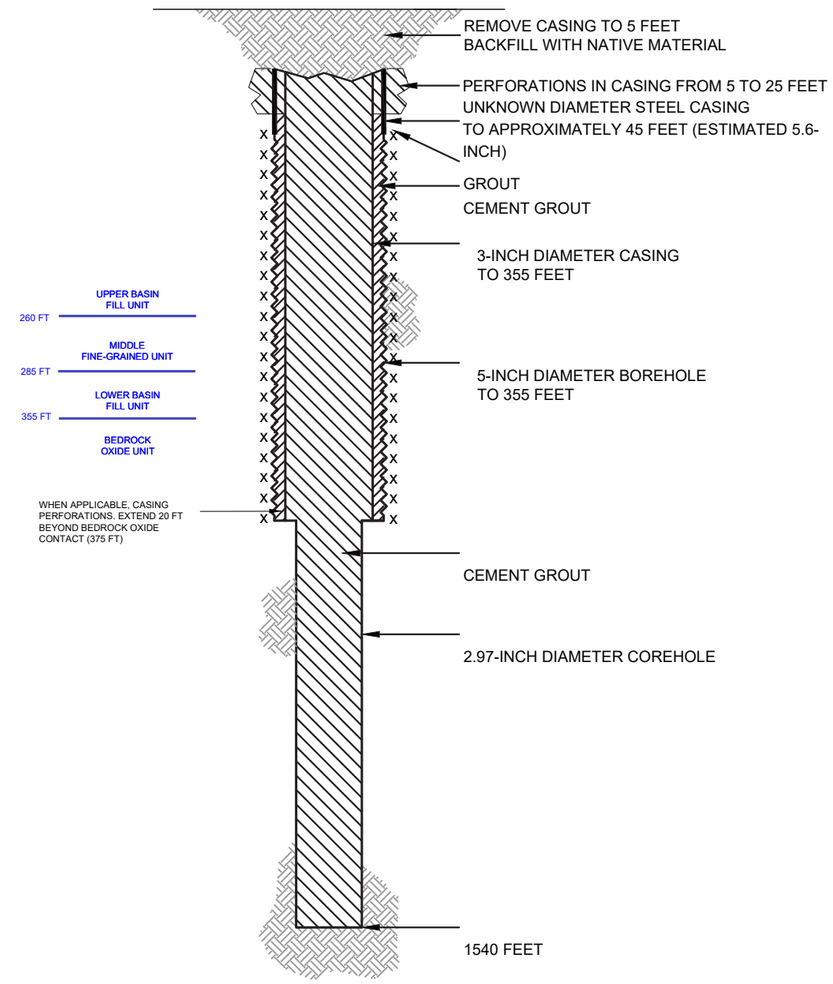
AS-BUILT COREHOLE 266S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 266S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 266S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		267S

State	County
Arizona	Pinal

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

Latitude 33.04913371

Longitude -111.4252596

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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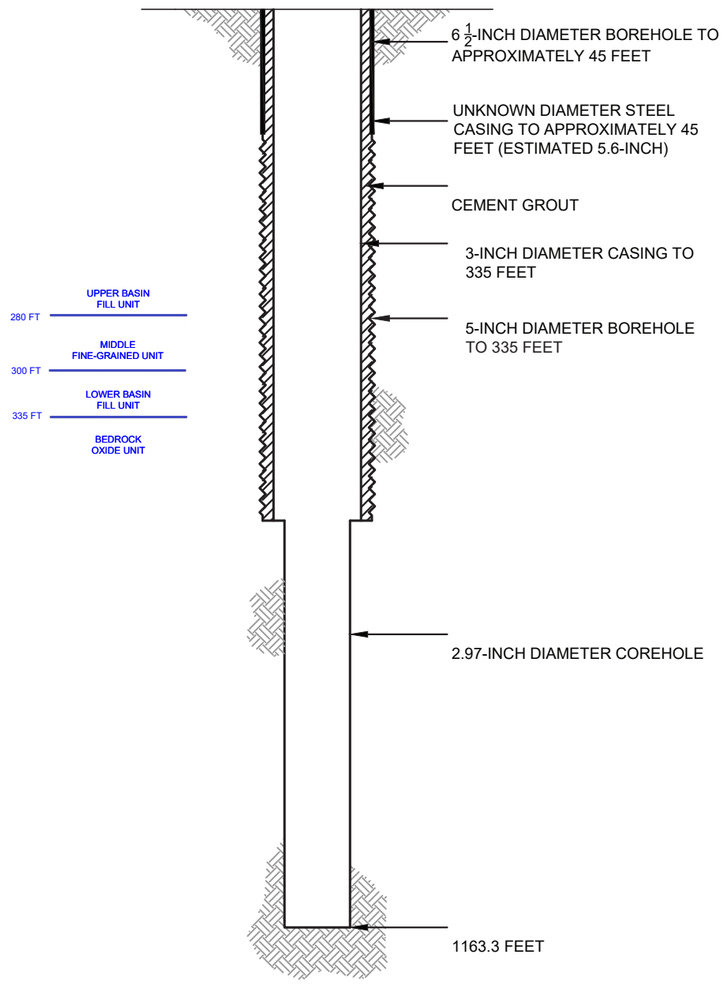
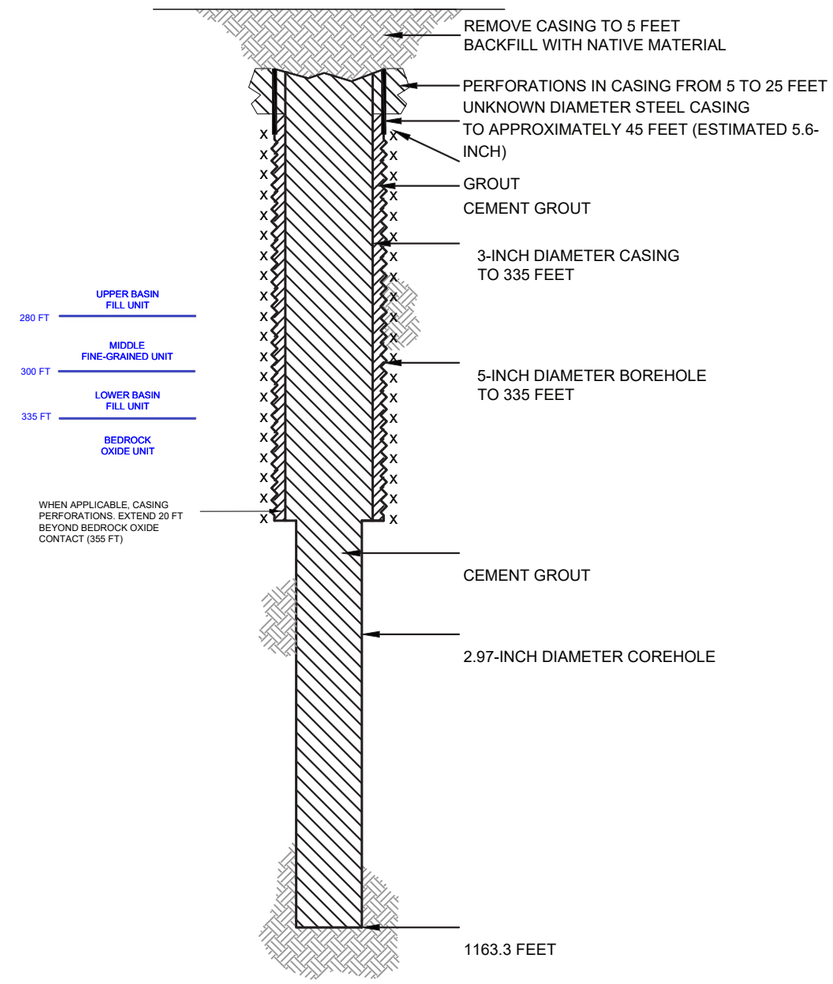
AS-BUILT COREHOLE 267S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 267S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 267S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		268MF

State	County
Arizona	Pinal

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

Latitude 33.0491427

Longitude -111.4260768

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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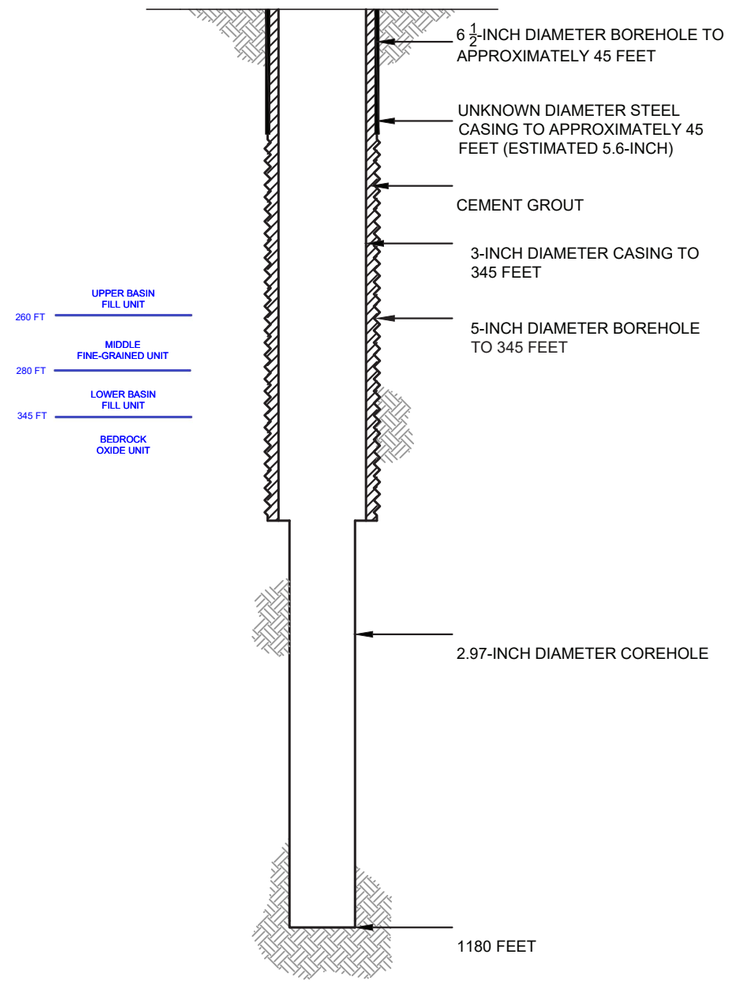
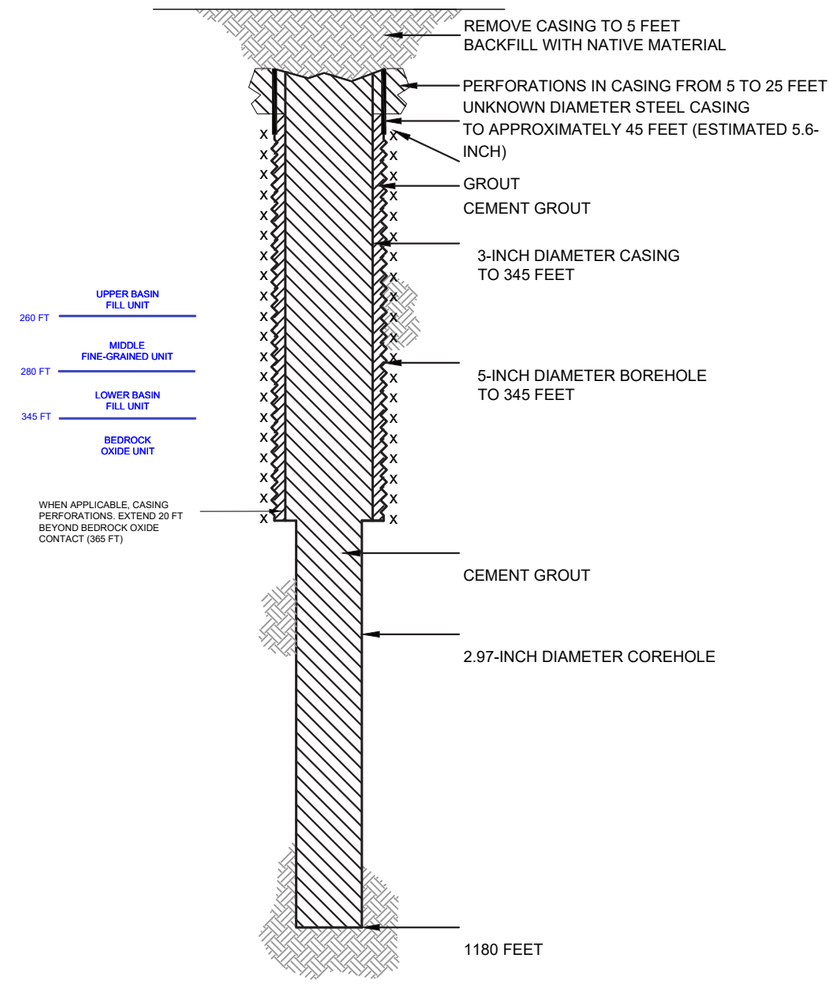
AS-BUILT COREHOLE 268MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 268MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 268MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

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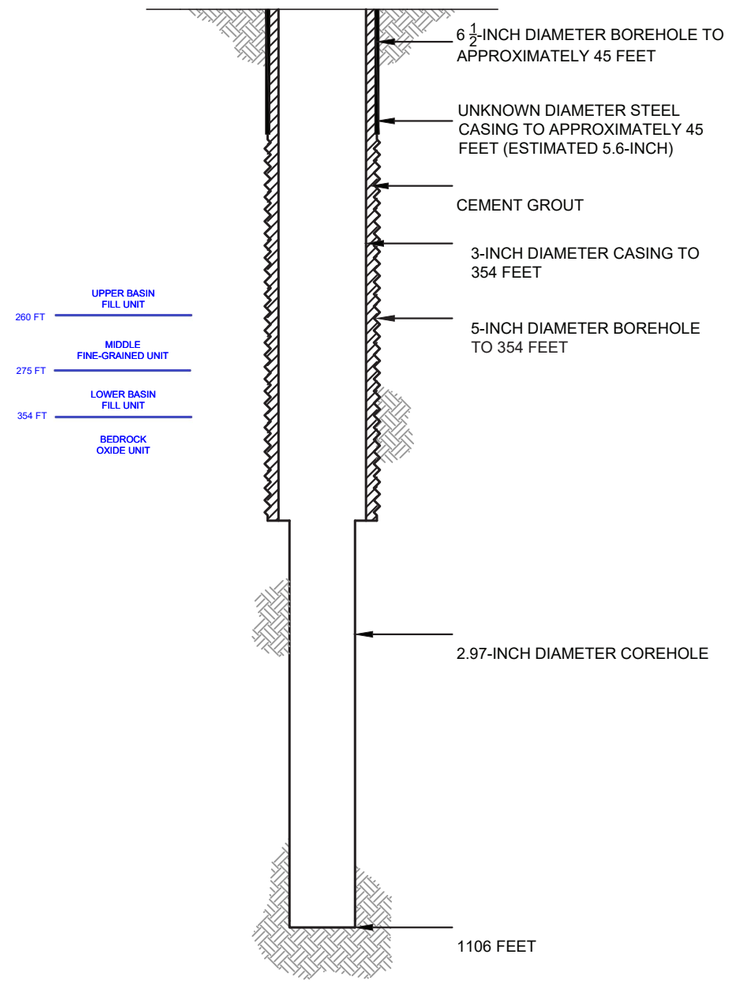

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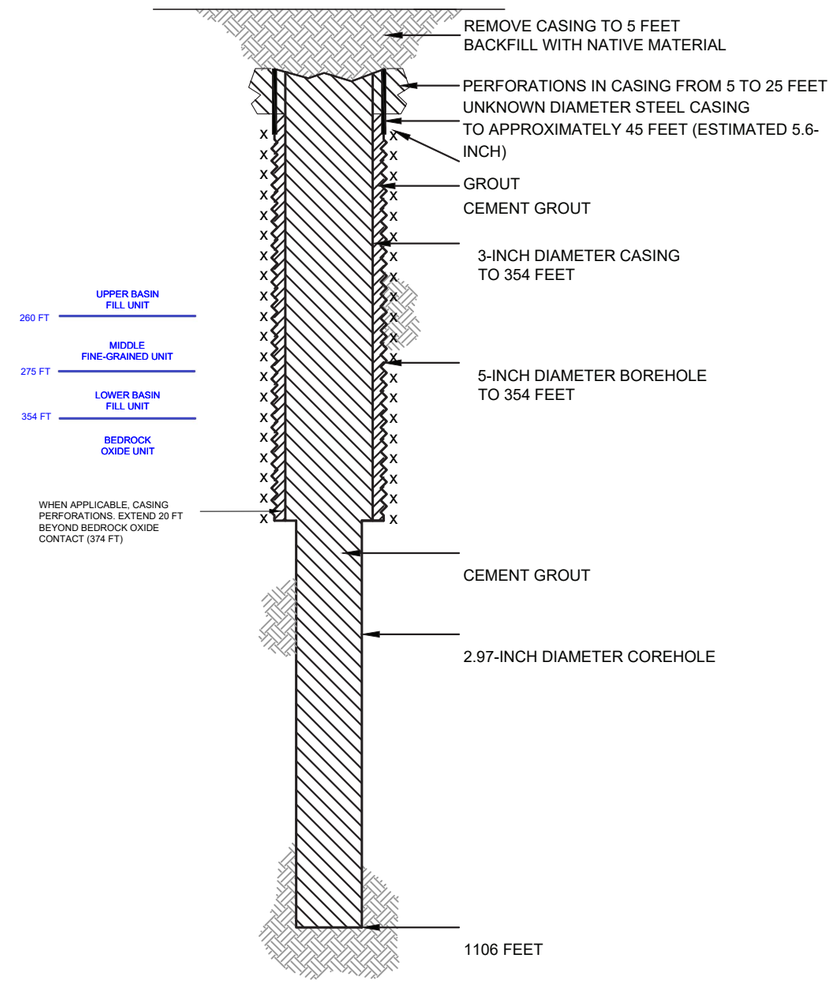

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COREHOLE 269S DIAGRAM

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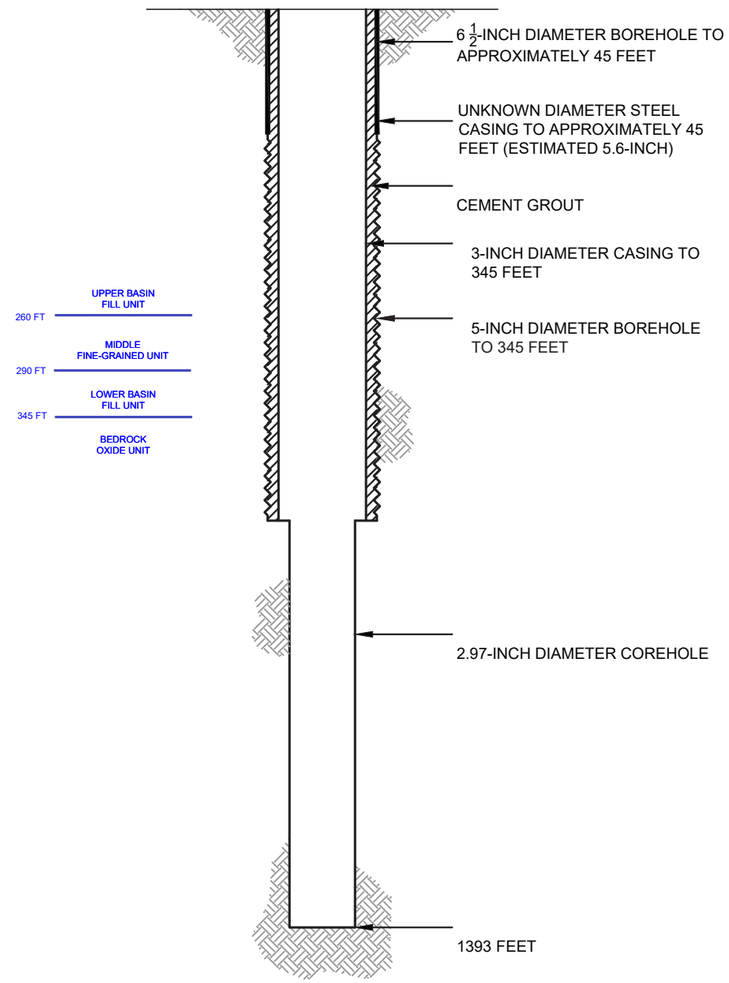
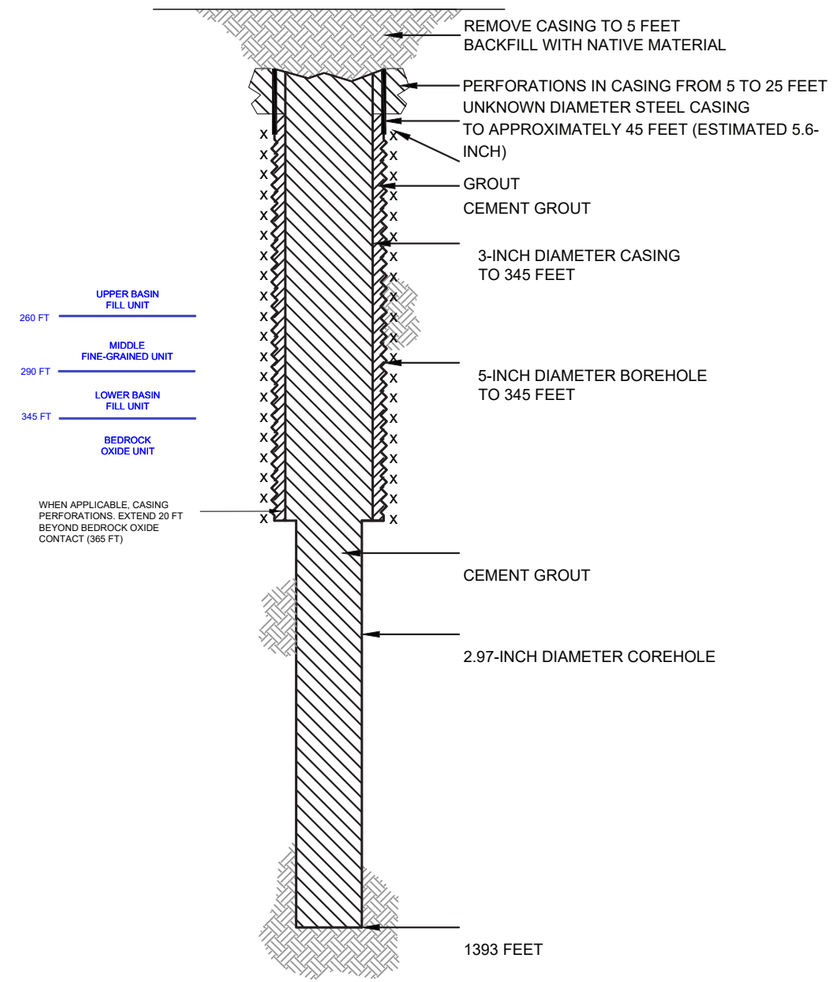
AS-BUILT COREHOLE 279S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 279S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 279S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		280S

State	County
Arizona	Pinal

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

Latitude 33.05152735

Longitude -111.4285155

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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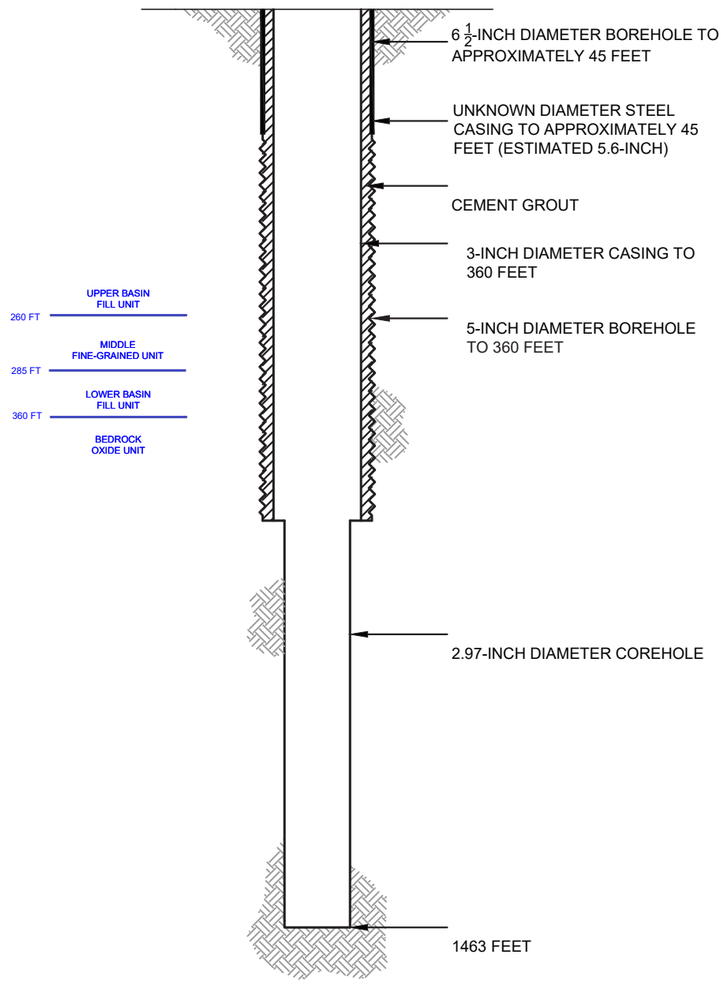
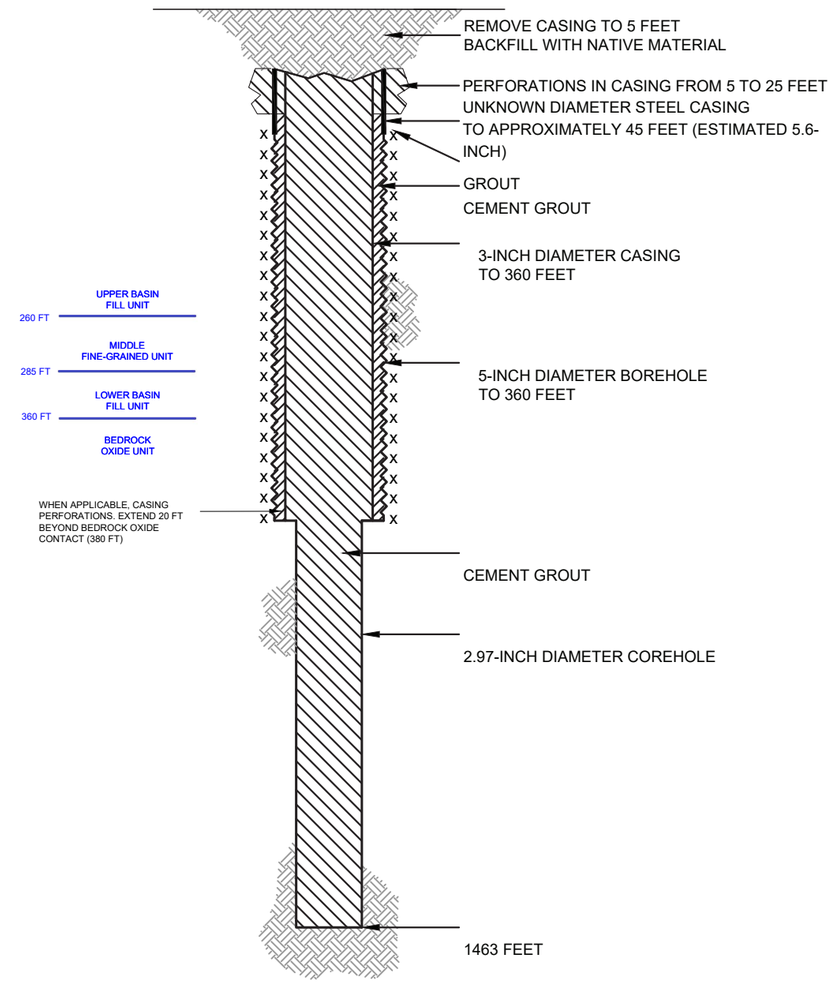
AS-BUILT COREHOLE 280S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 280S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 280S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		282S

State	County
Arizona	Pinal

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

Latitude 33.05012402

Longitude -111.4268631

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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

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Dan Johnson, VP - General Manager		10/3/2019

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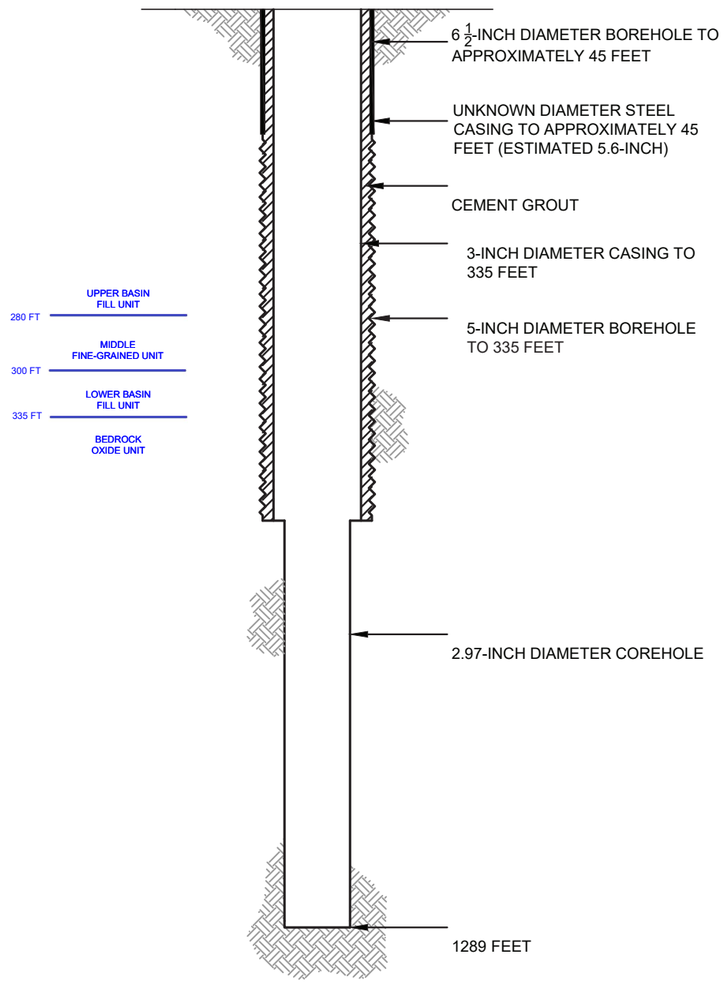
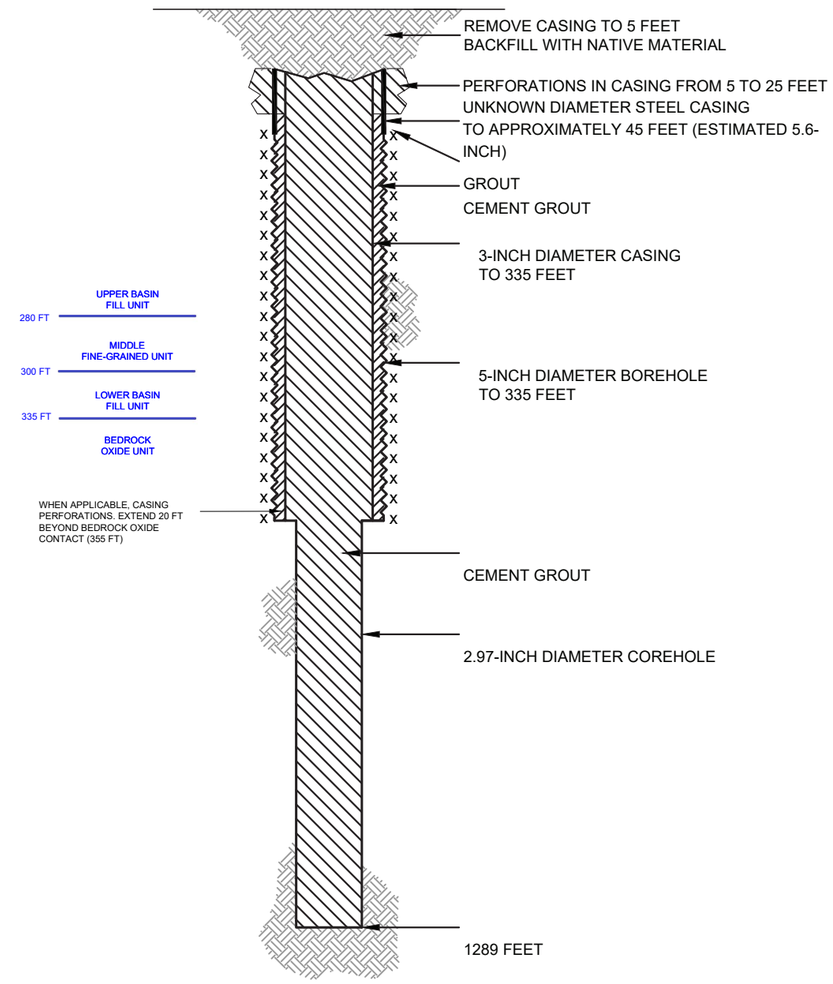
AS-BUILT COREHOLE 282S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 282S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 282S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		316

State	County
Arizona	Pinal

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

Latitude 33.05333897

Surface Location

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

Longitude -111.4323965

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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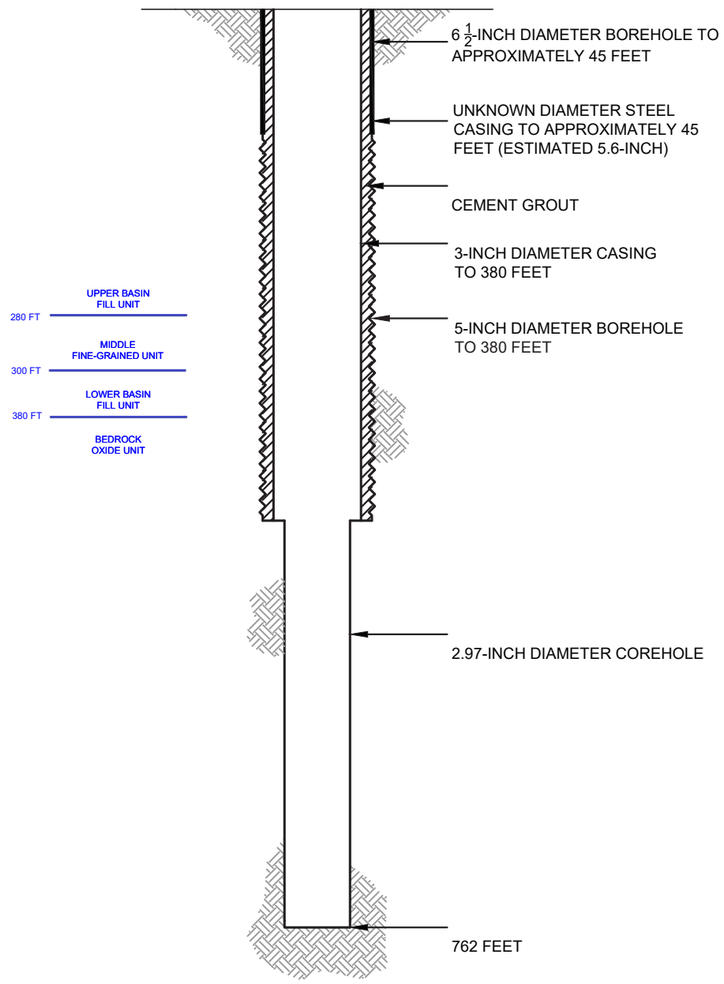
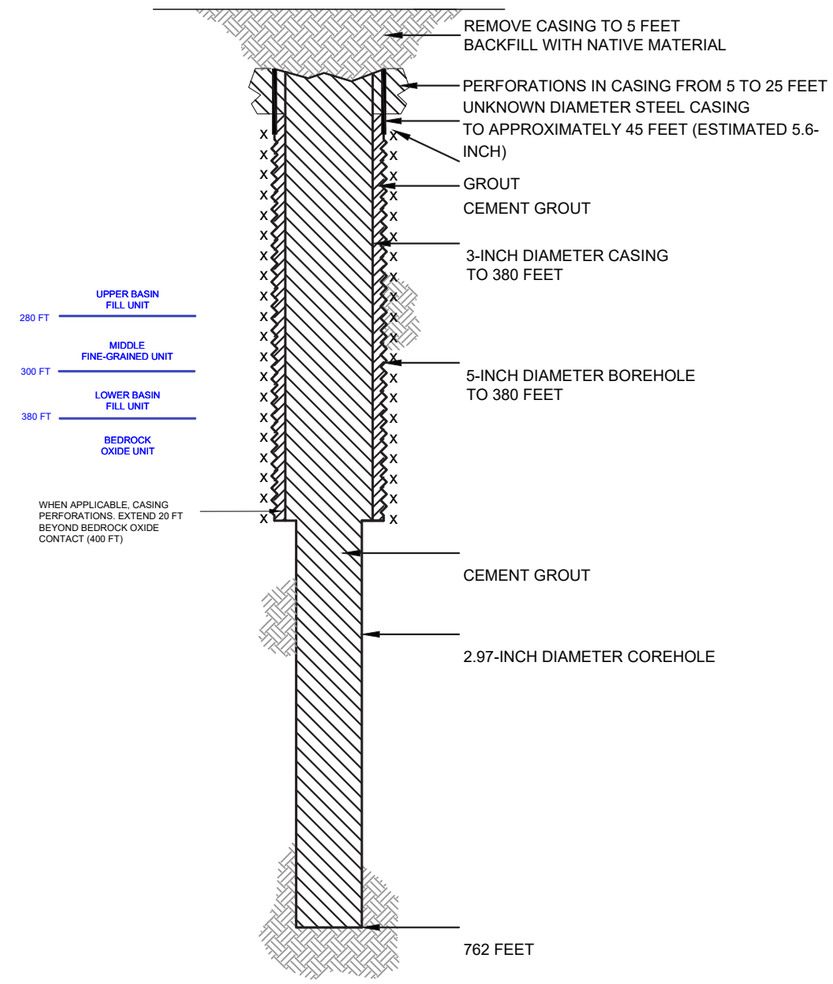
AS-BUILT COREHOLE 316



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 316



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 316 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		326S

State	County
Arizona	Pinal

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

Latitude 33.05091849

Longitude -111.4240311

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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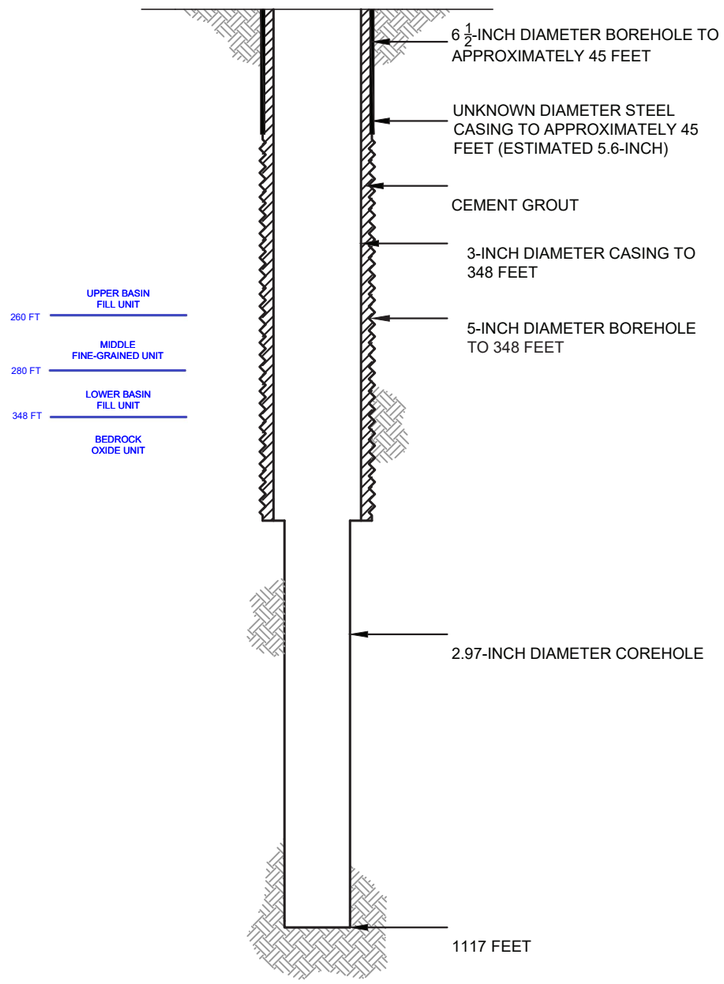
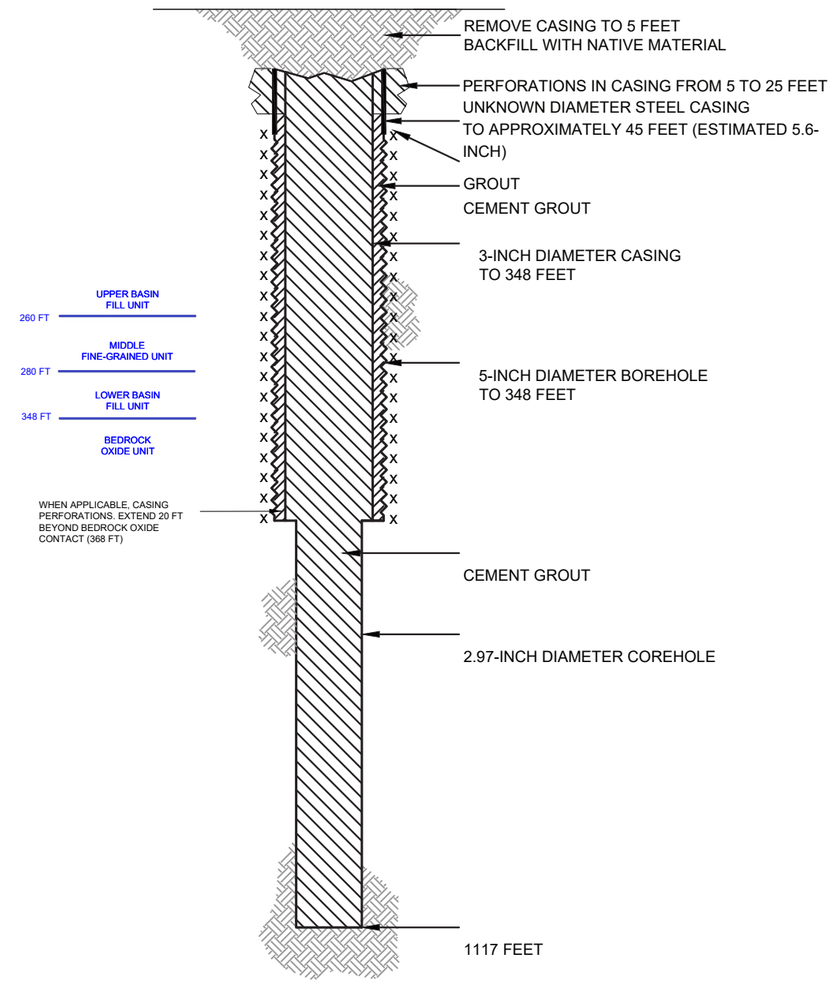
AS-BUILT COREHOLE 326S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 326S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 326S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		327S

State	County
Arizona	Pinal

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

Latitude 33.05151516

Longitude -111.4244357

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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Dan Johnson, VP - General Manager		10/3/2019

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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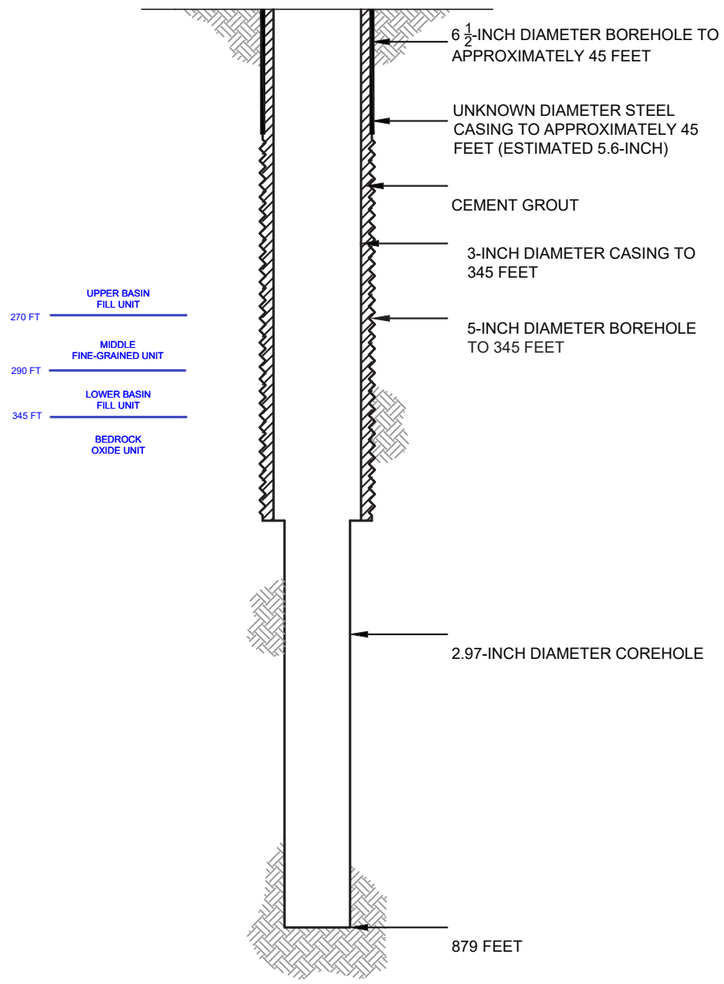
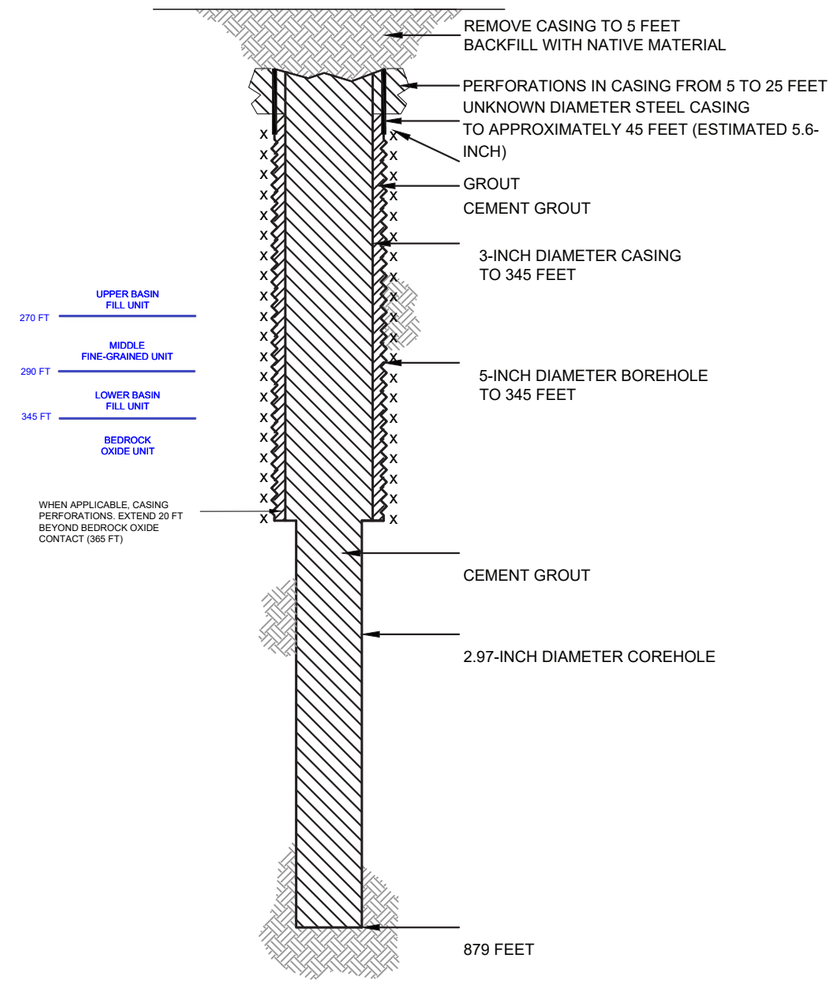
AS-BUILT COREHOLE 327S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 327S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 327S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		328S

State	County
Arizona	Pinal

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

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Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Dan Johnson, VP - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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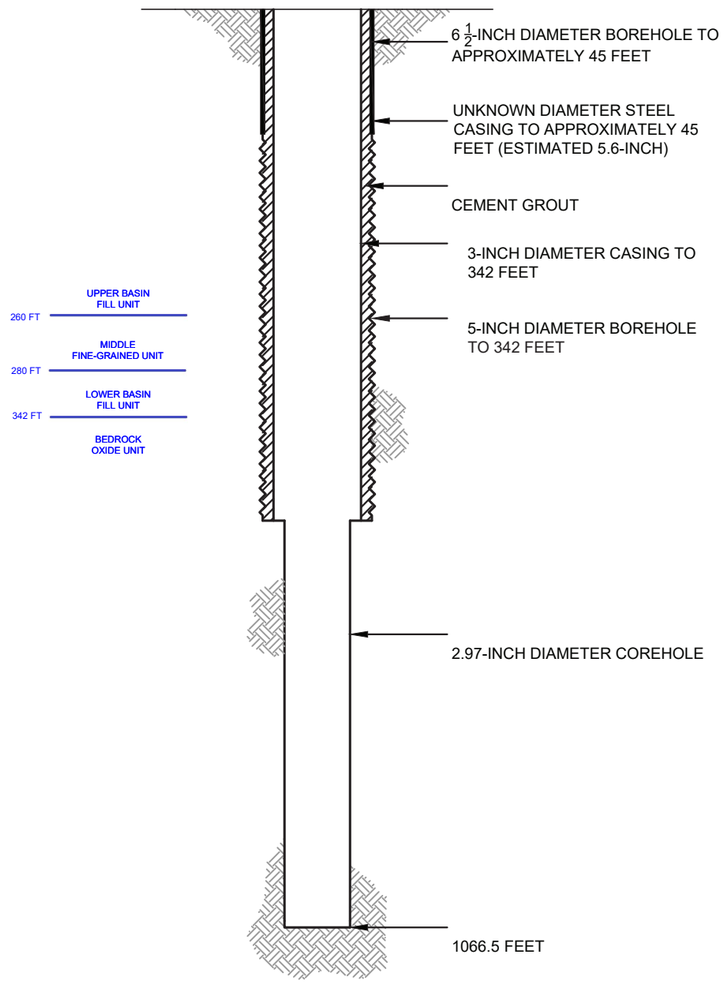
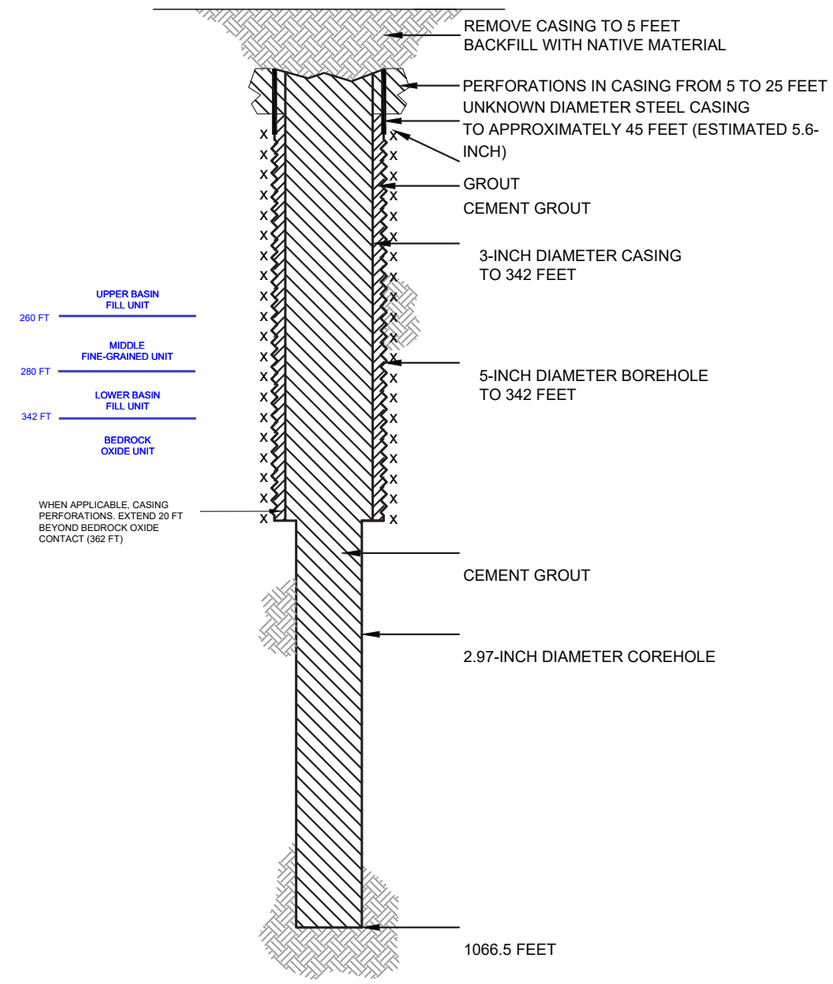
AS-BUILT COREHOLE 328S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 328S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 328S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		329S

State	County
Arizona	Pinal

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

Latitude 33.05092492

Longitude -111.4256629

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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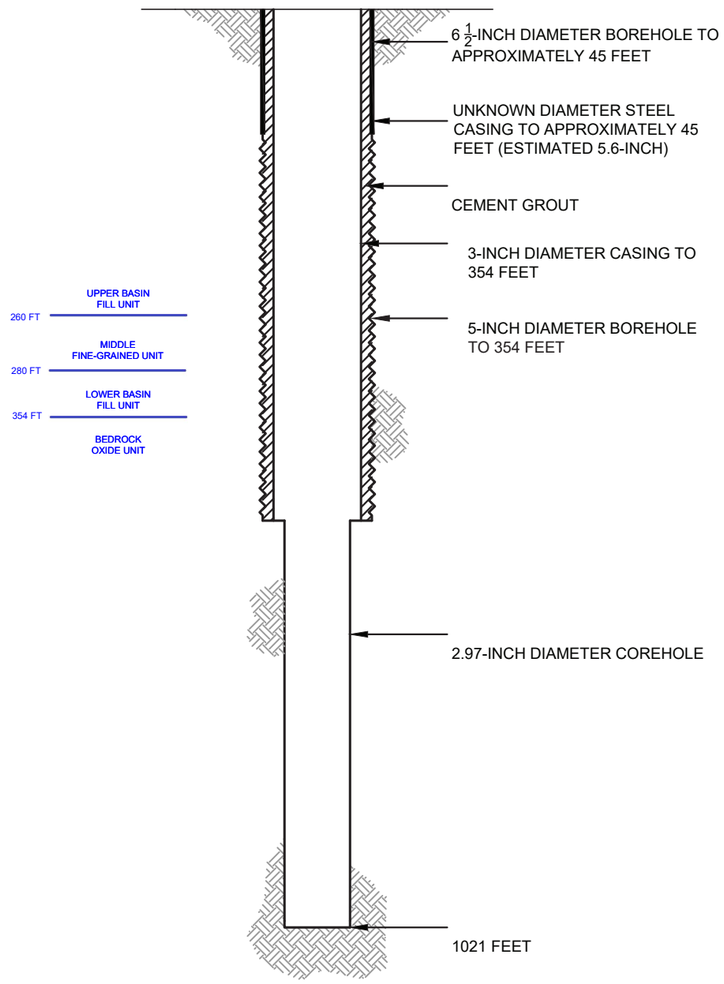
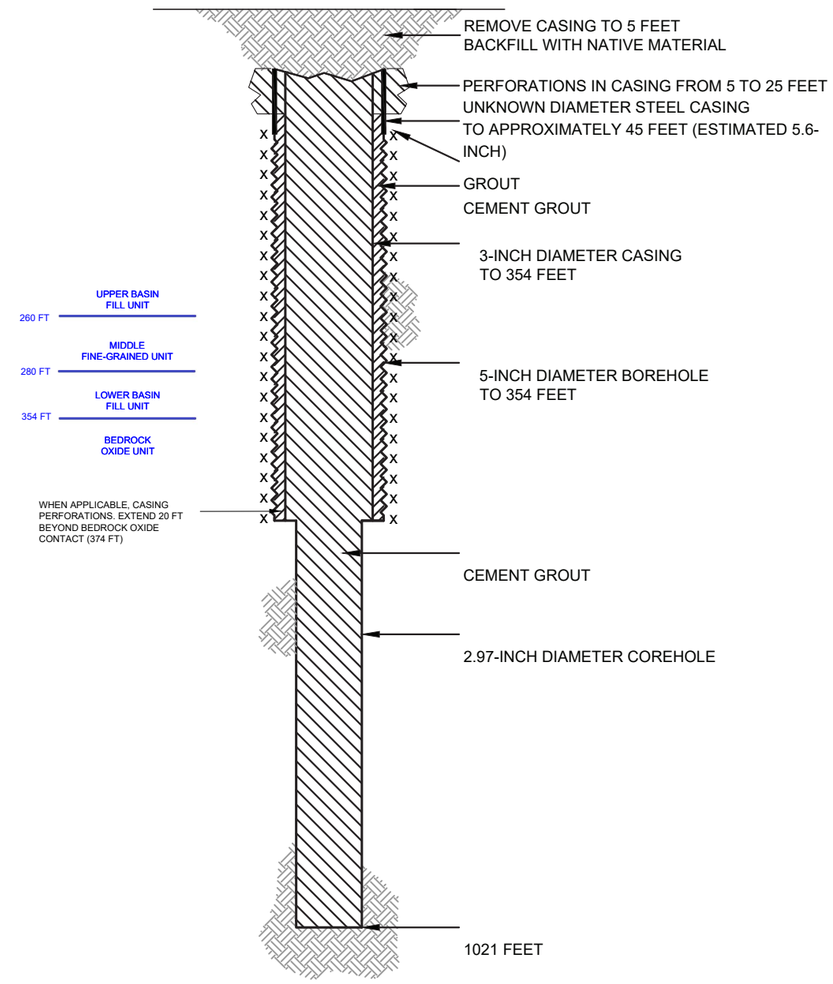


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 329S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 329S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		330S

State	County
Arizona	Pinal

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

Latitude 33.05036633

Longitude -111.4252264

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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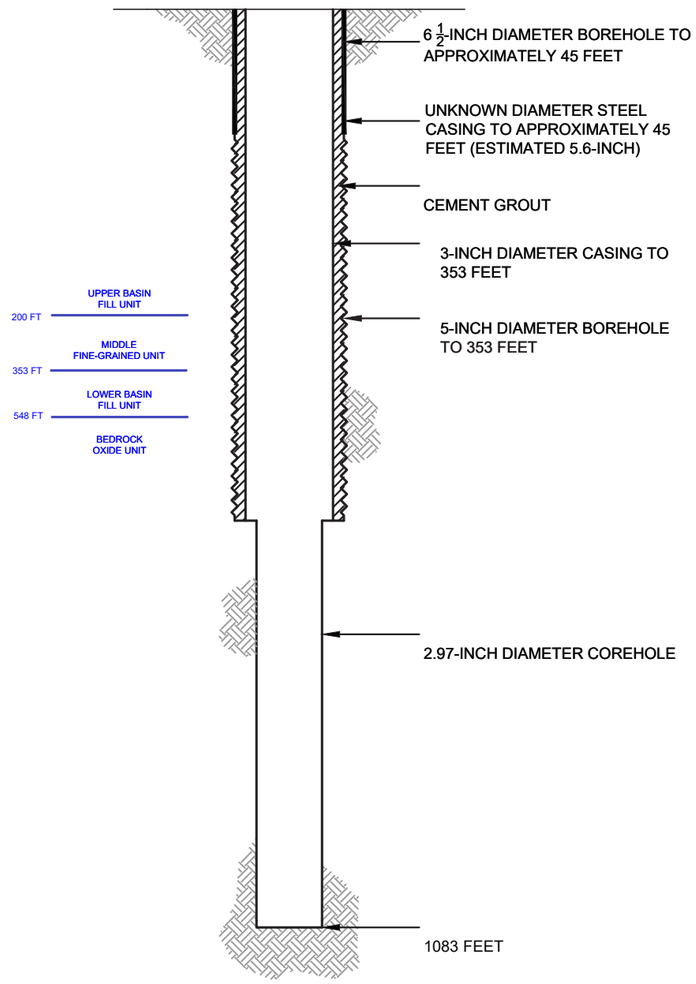
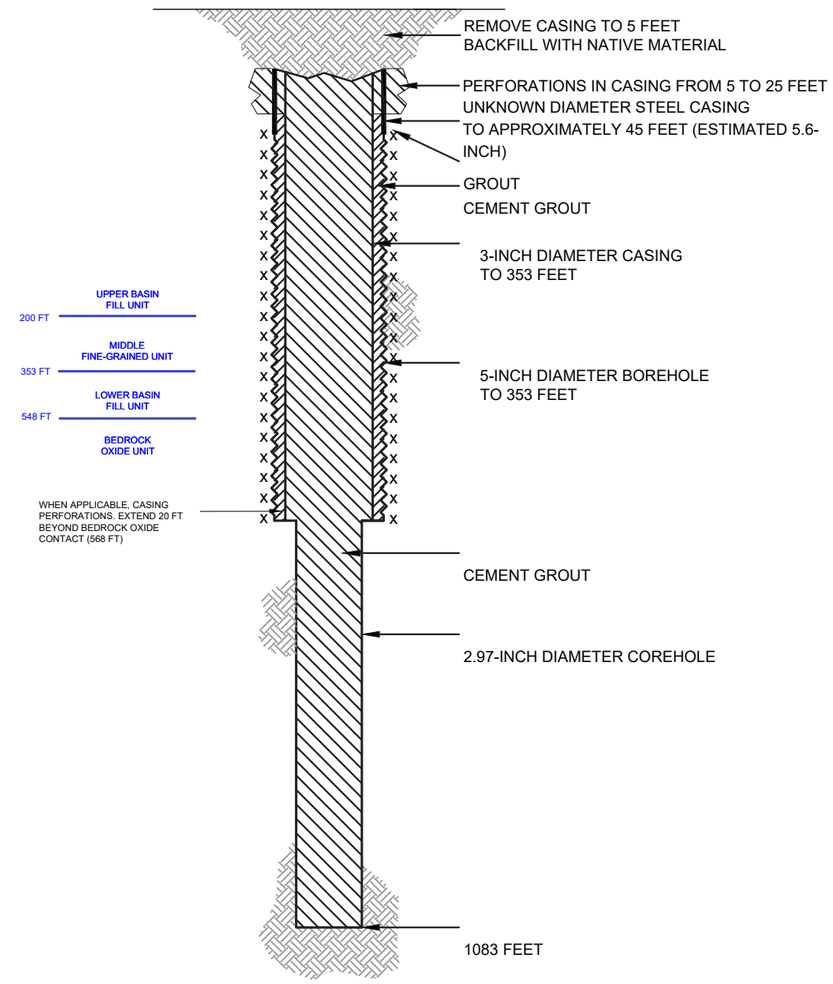


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 330S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 330S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

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R9UIC-AZ3-FY11-1		331S

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If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

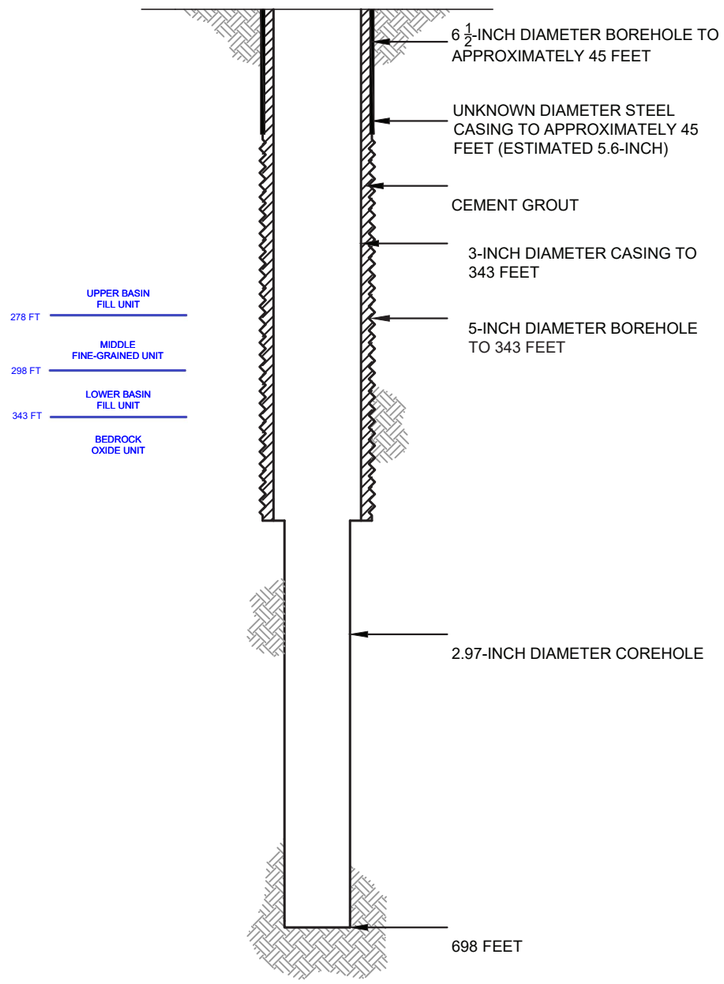
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

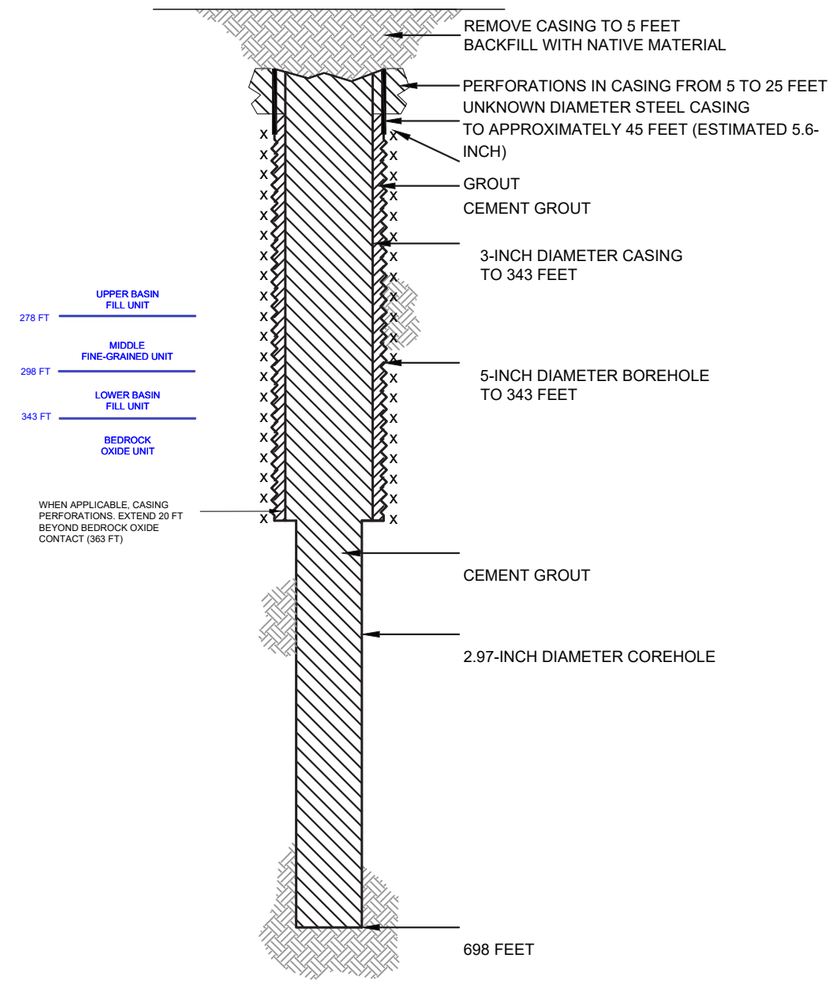
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 331S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 331S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 331S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		333S

State	County
Arizona	Pinal

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

Latitude 33.05032504

Longitude -111.4244423

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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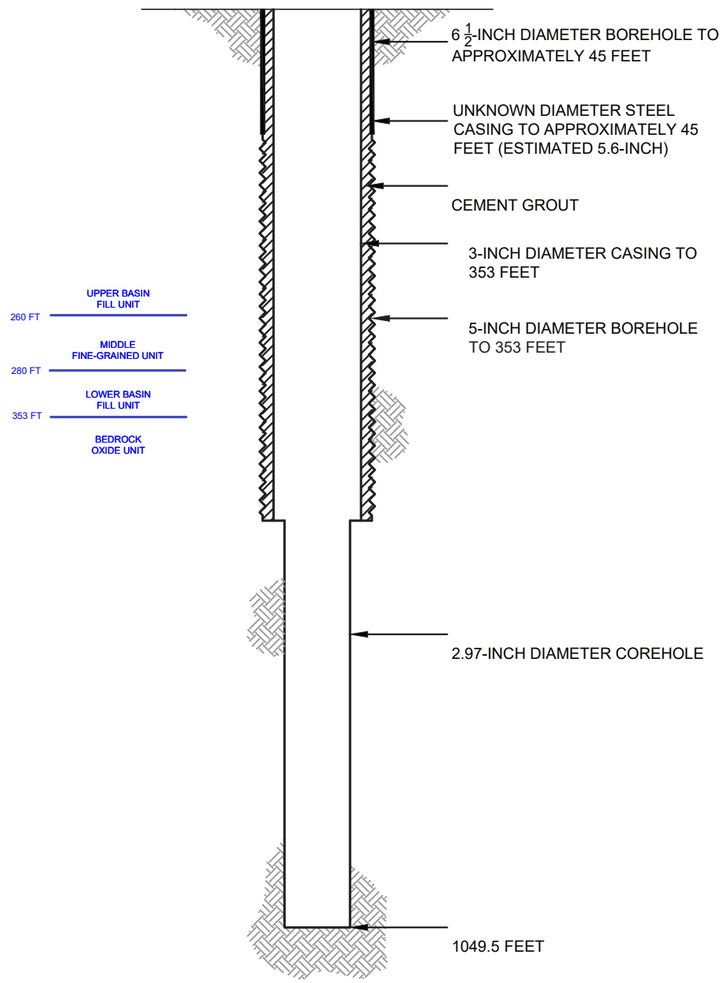
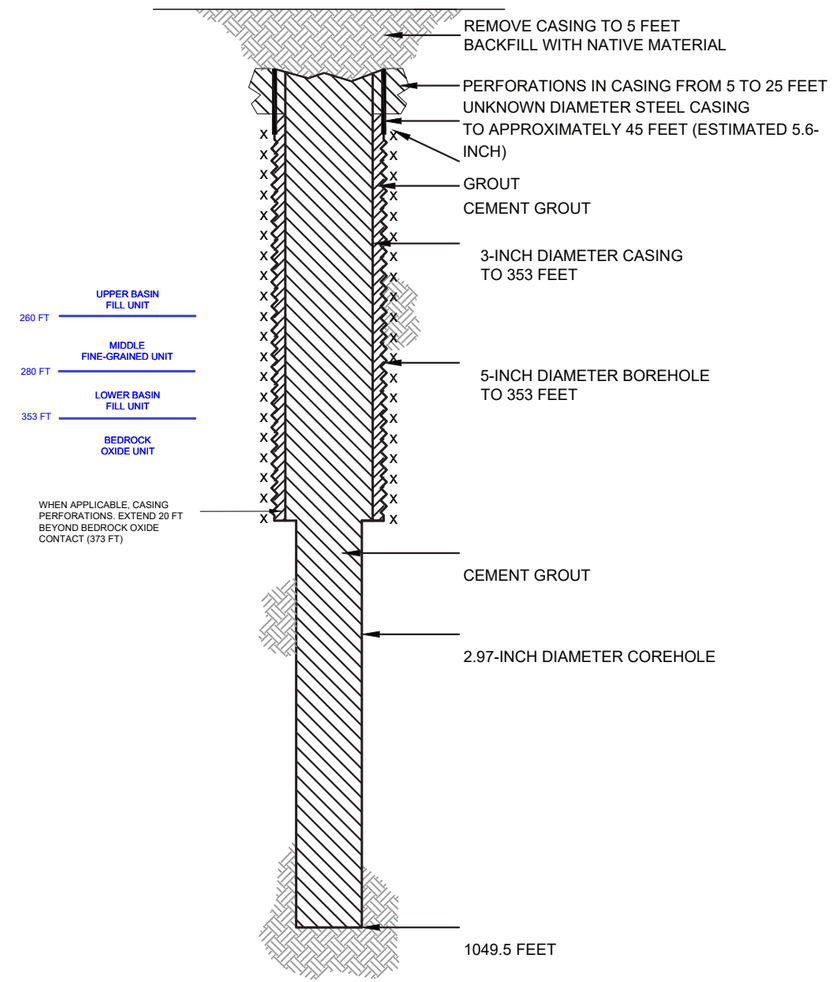
AS-BUILT COREHOLE 333S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 333S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 333S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		334S

State	County
Arizona	Pinal

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

Latitude 33.05032182

Longitude -111.4236265

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP - General Manager		10/3/2019

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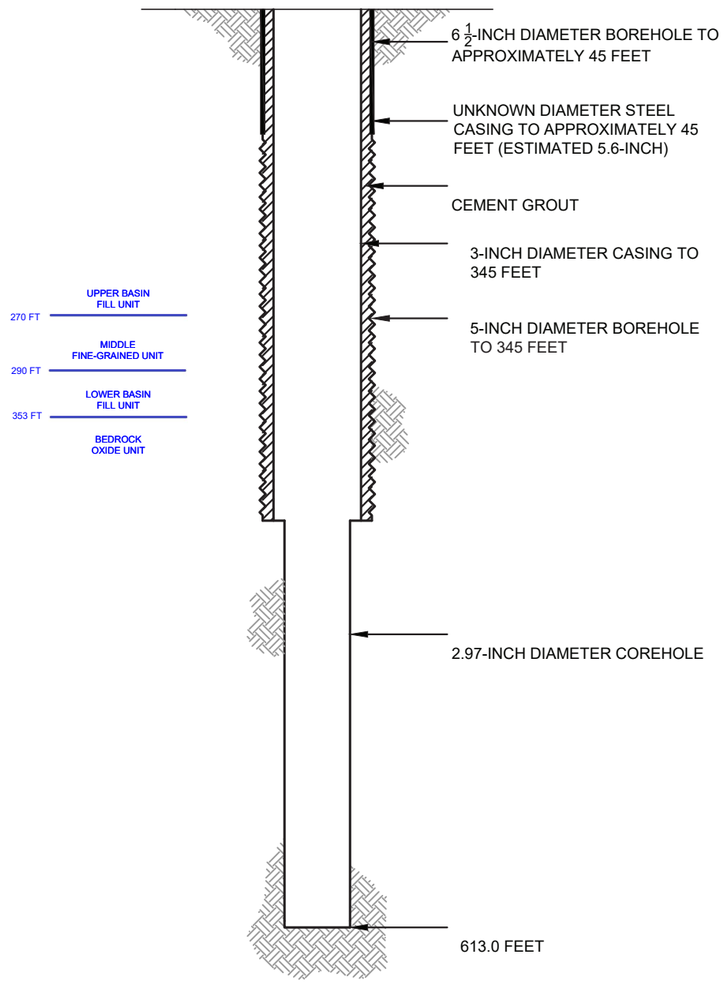
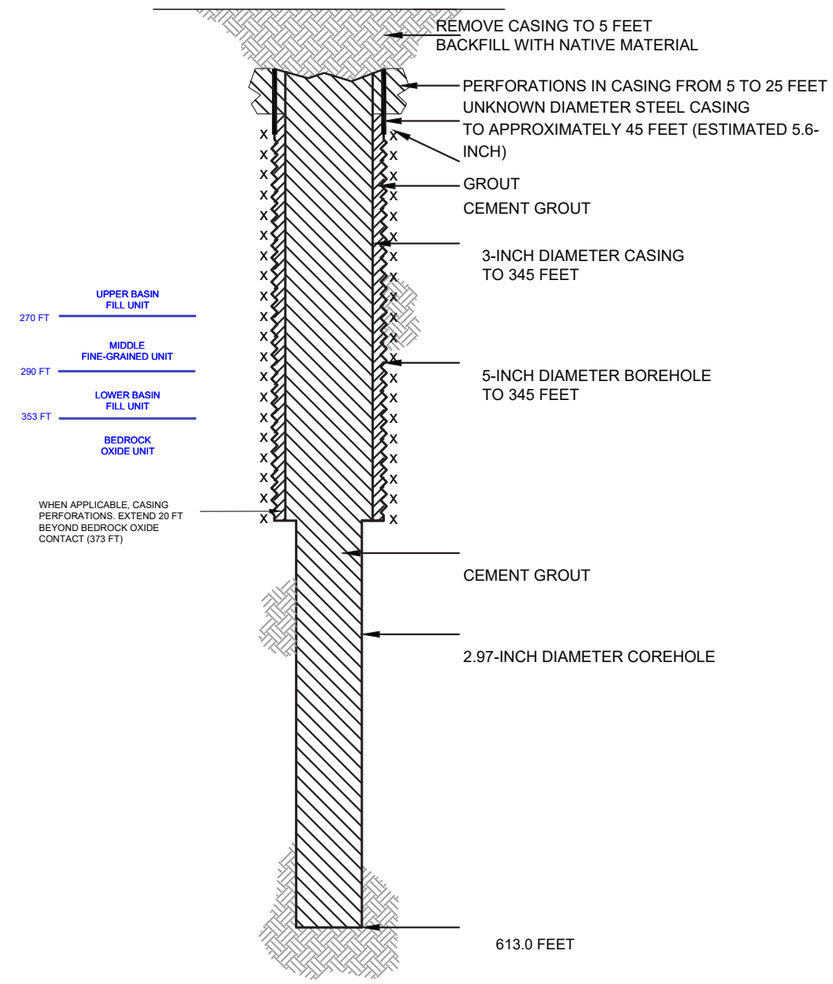
AS-BUILT COREHOLE 344S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 344S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 344S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		335S

State	County
Arizona	Pinal

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

Latitude 33.05210539

Longitude -111.4232086

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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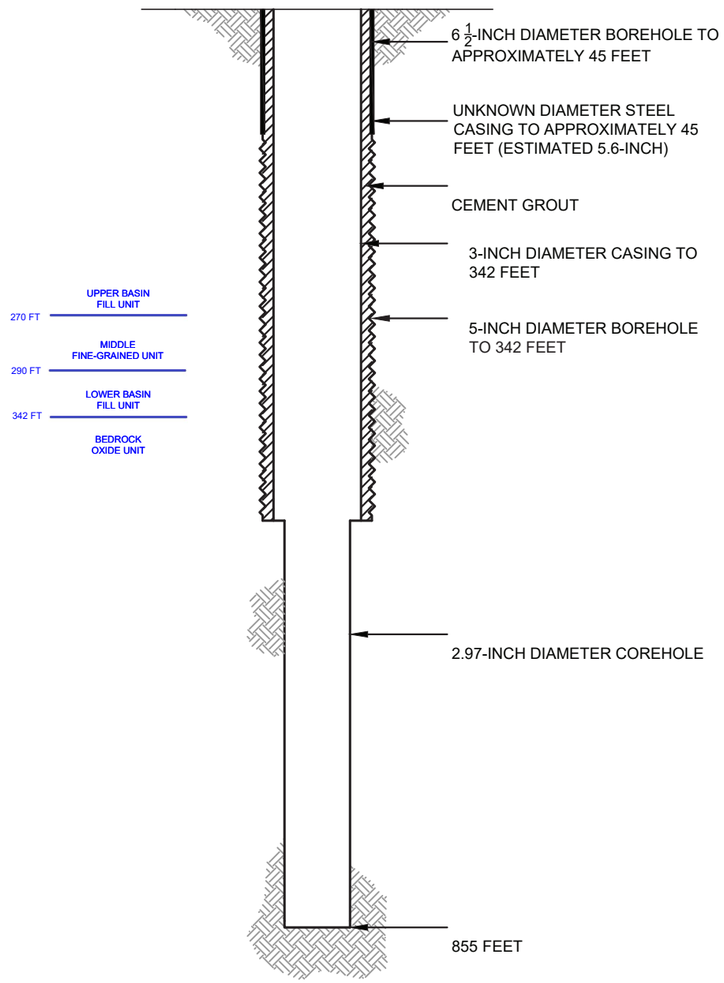
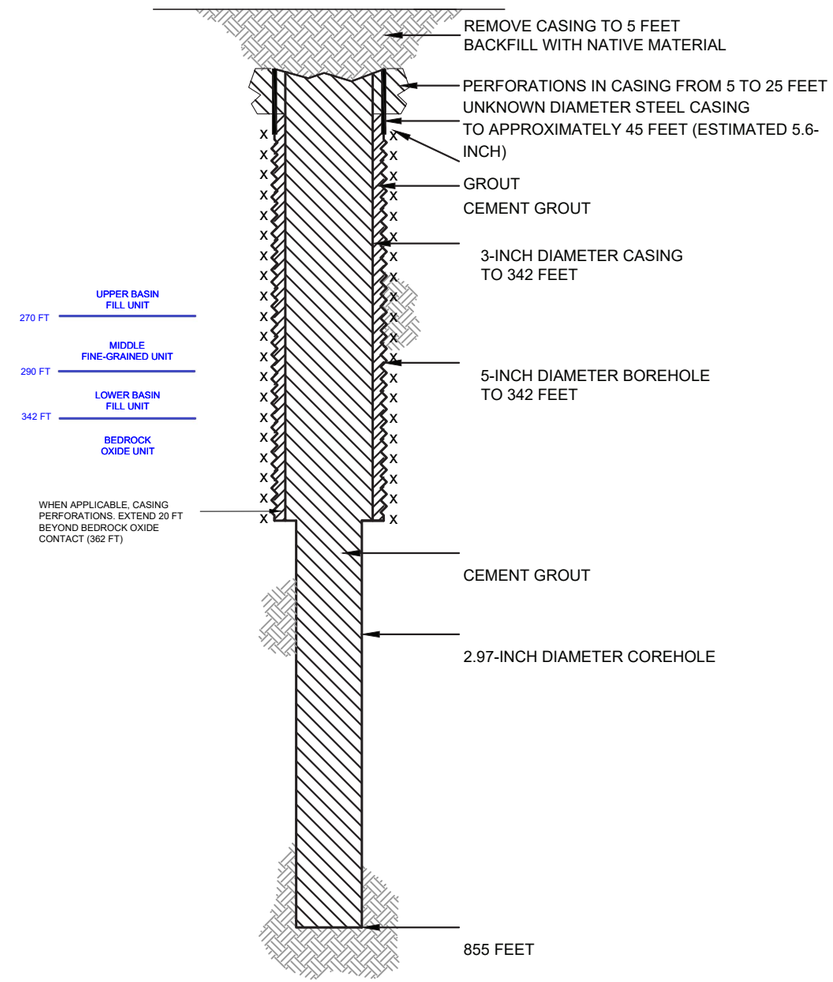
AS-BUILT COREHOLE 335S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 335S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 335S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

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R9UIC-AZ3-FY11-1		336S

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

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_____ **ft. from (N/S)** _____ **Line of quarter section**

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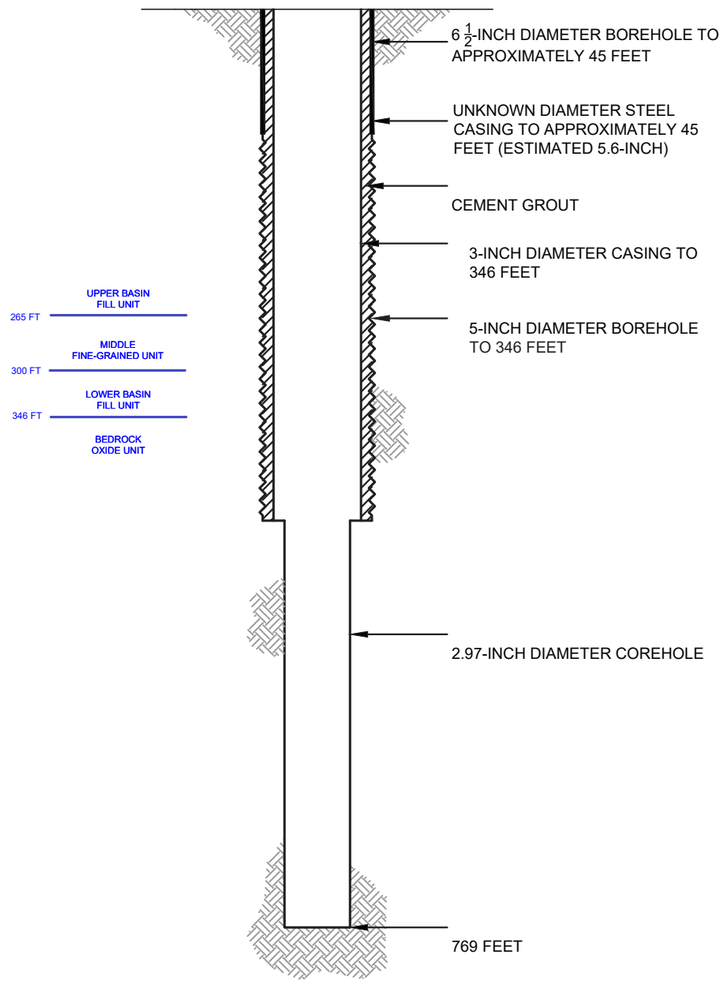

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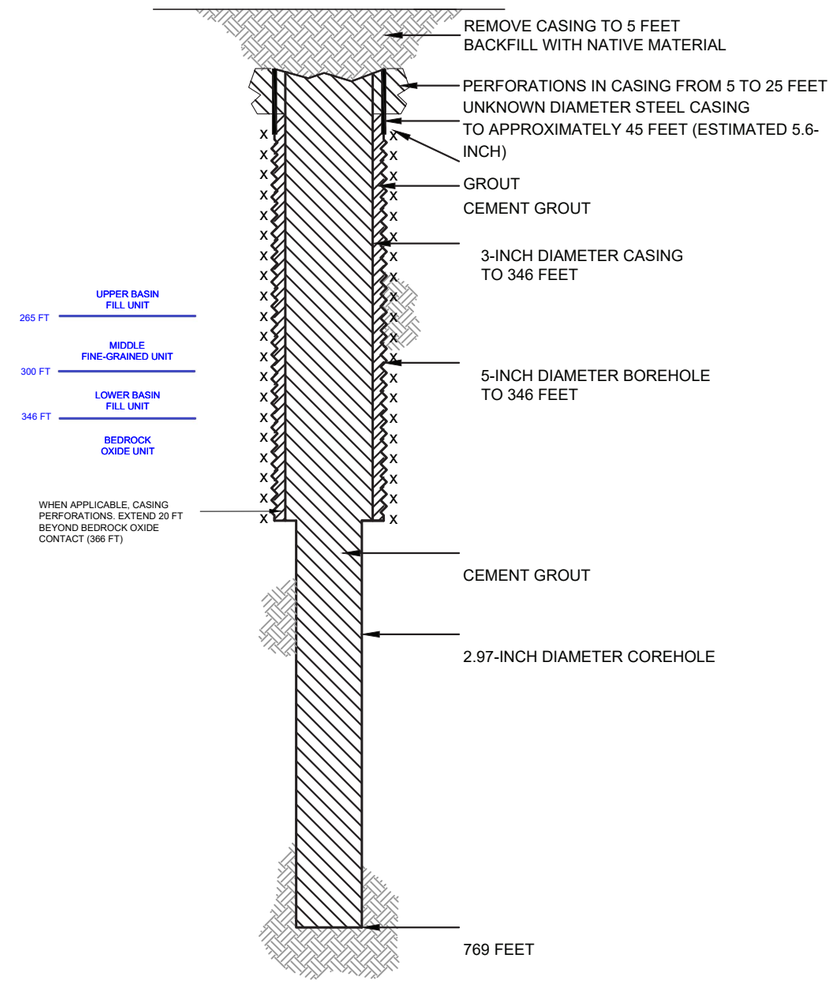

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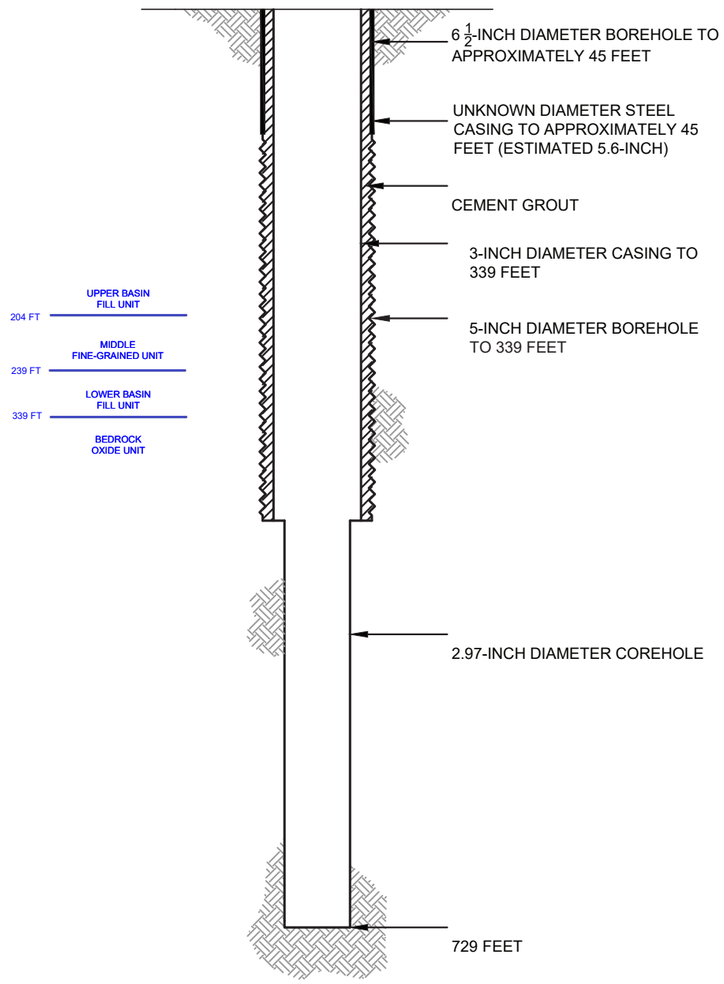
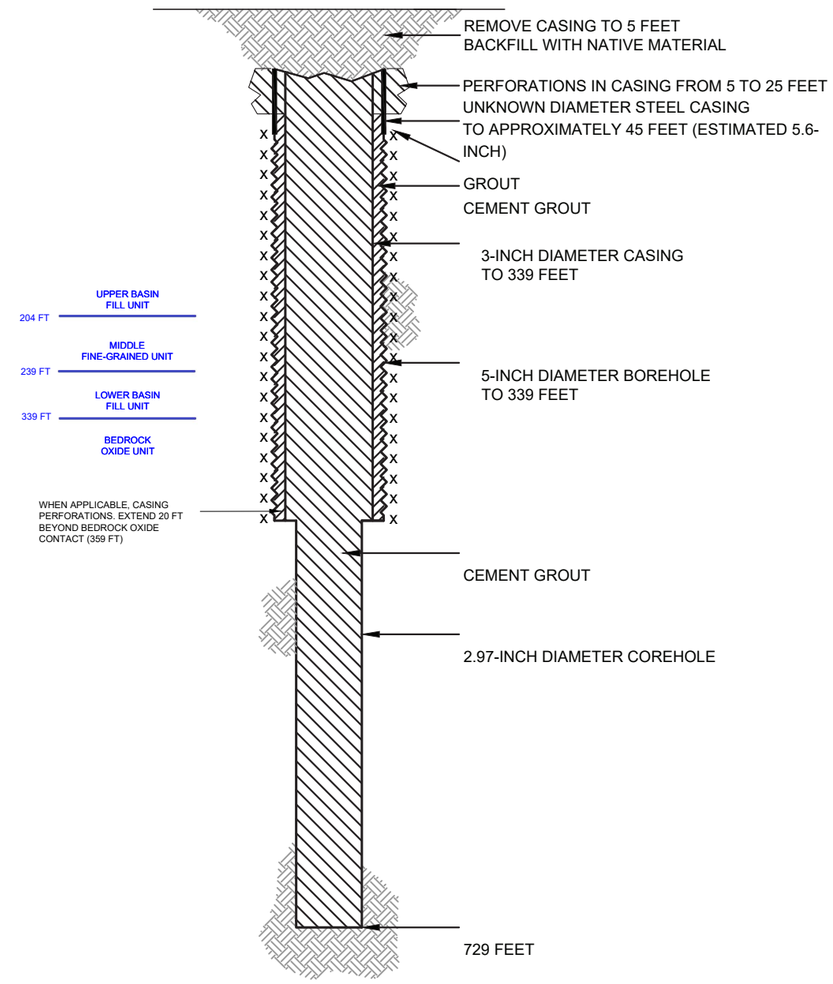
AS-BUILT COREHOLE 339S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 339S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 339S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		340S

State	County
Arizona	Pinal

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

Latitude 33.05270528

Longitude -111.4244291

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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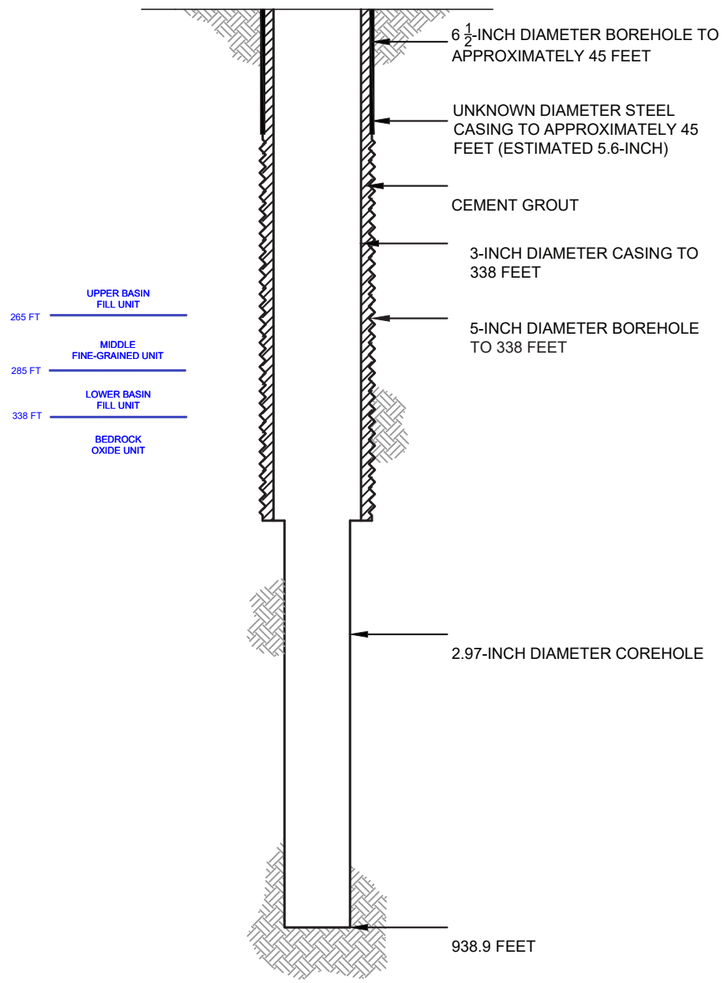
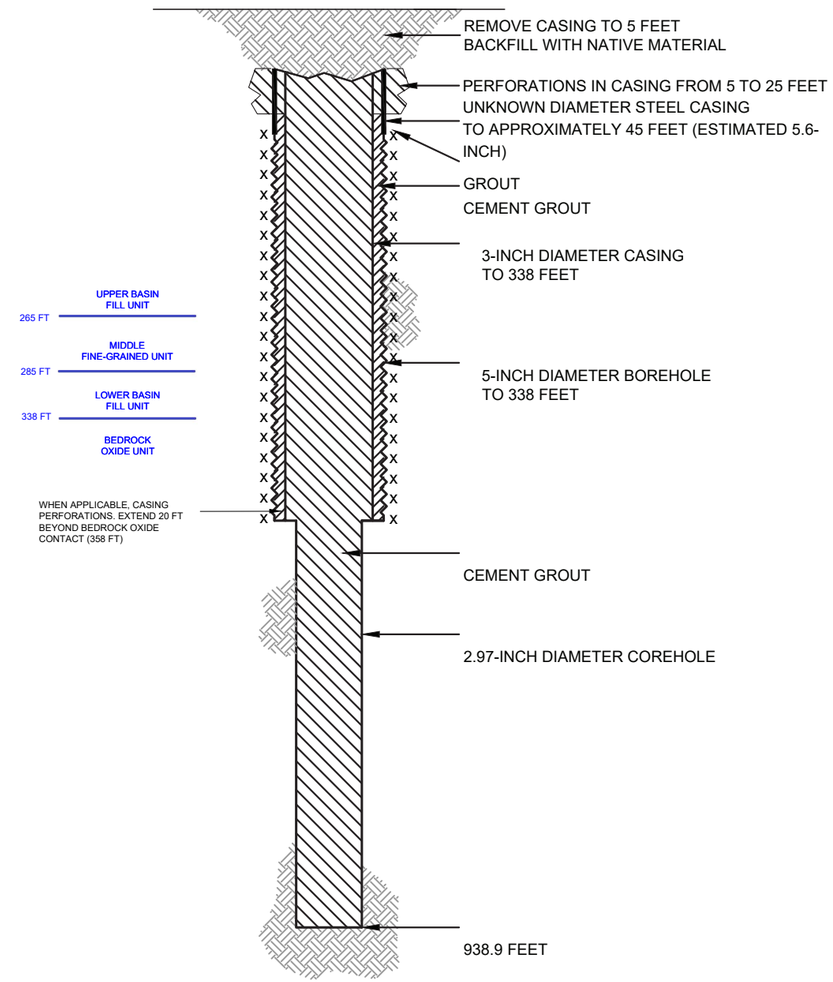
AS-BUILT COREHOLE 340S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 340S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 340S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		341S

State	County
Arizona	Pinal

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

Latitude 33.0527085

Longitude -111.425245

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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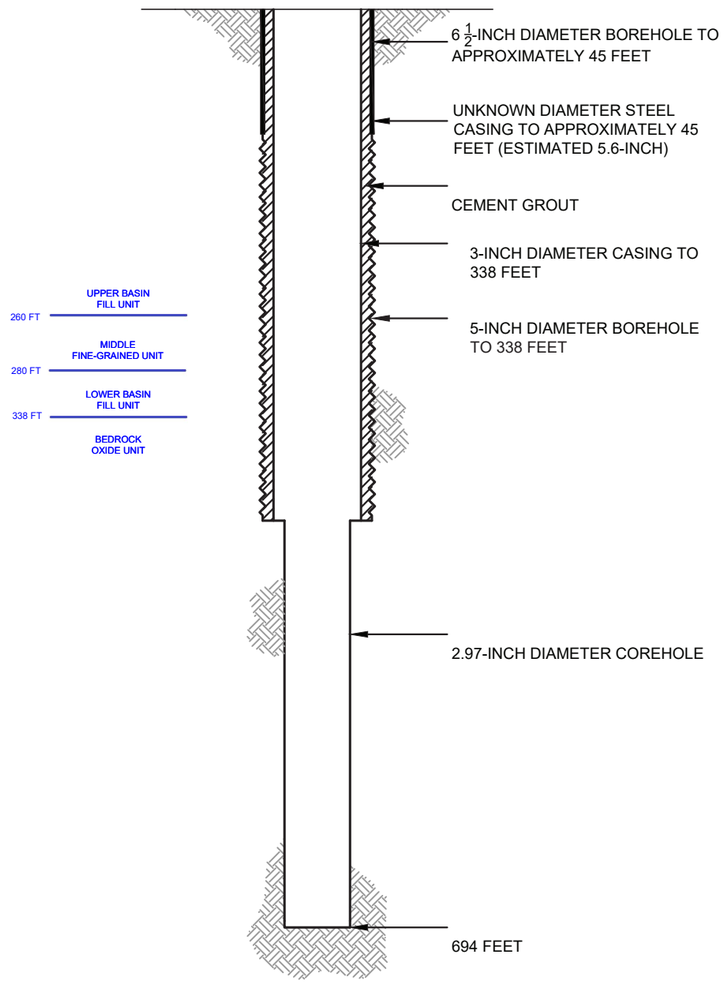
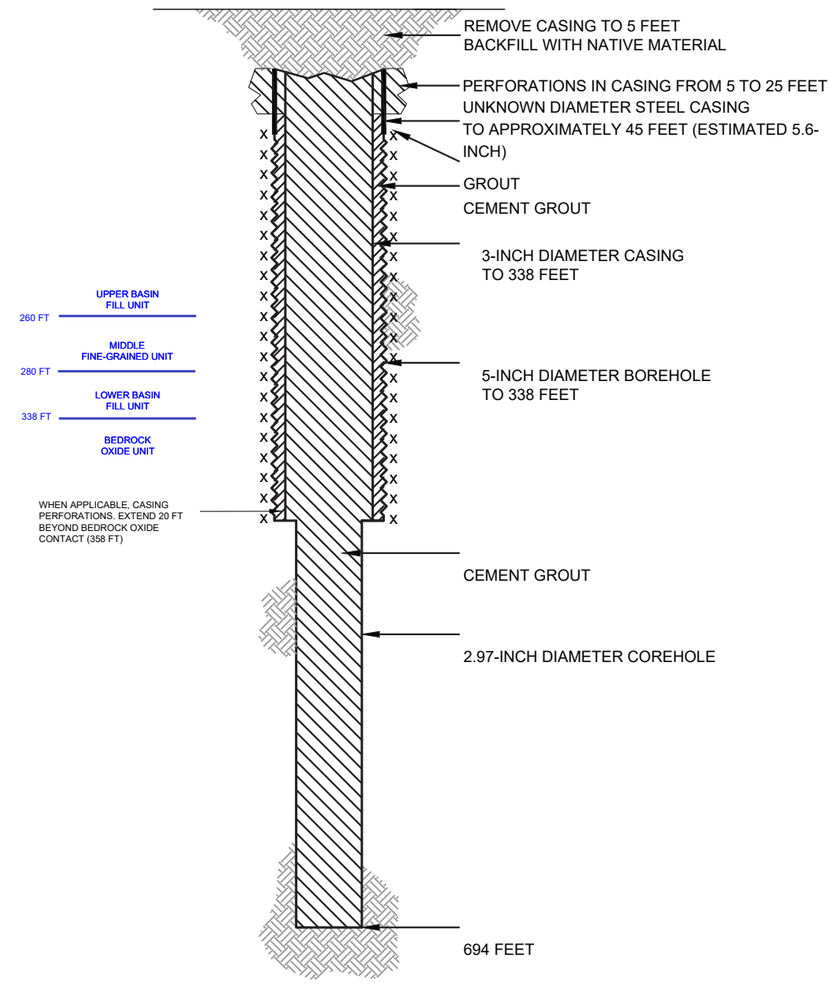


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 341S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 341S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		342S

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_____ **ft. from (N/S)** _____ **Line of quarter section**

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Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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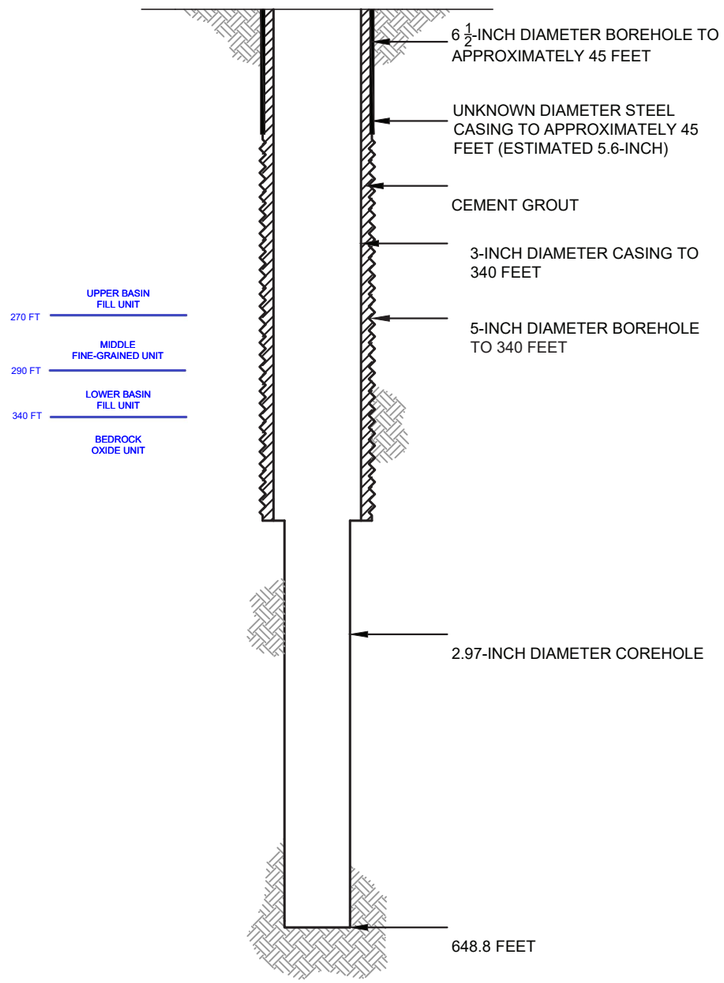
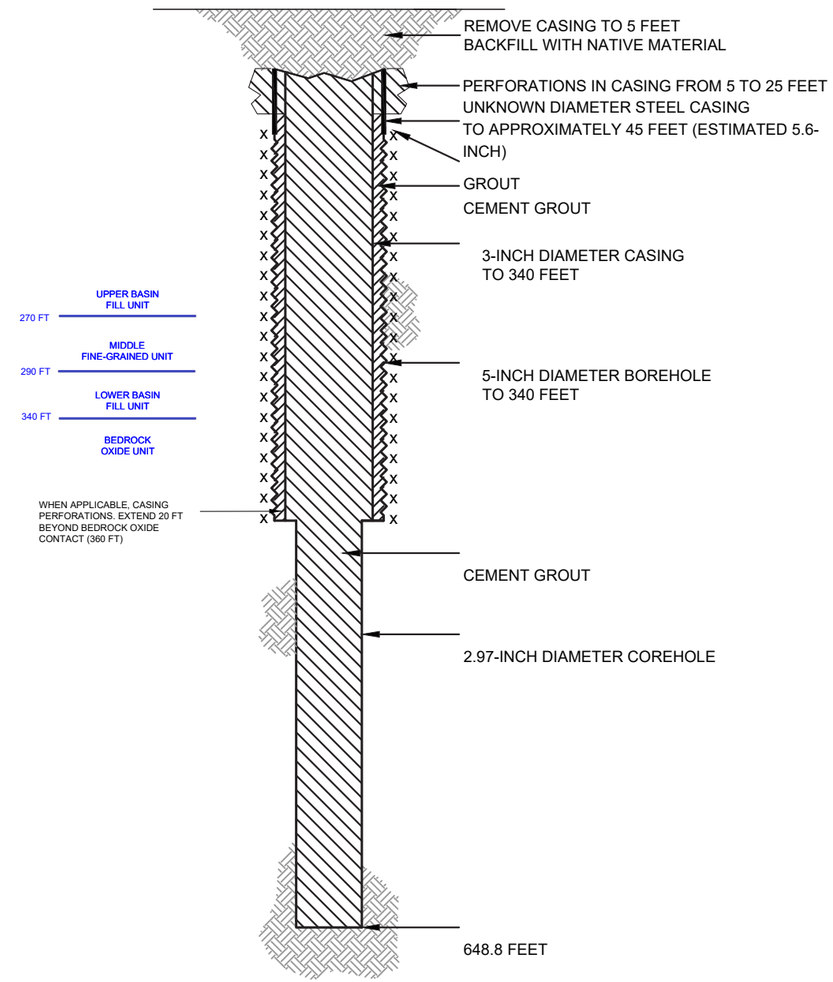
AS-BUILT COREHOLE 342S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 342S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 342S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		343S

State	County
Arizona	Pinal

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

Latitude 33.05271492

Surface Location

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

Longitude -111.4268768

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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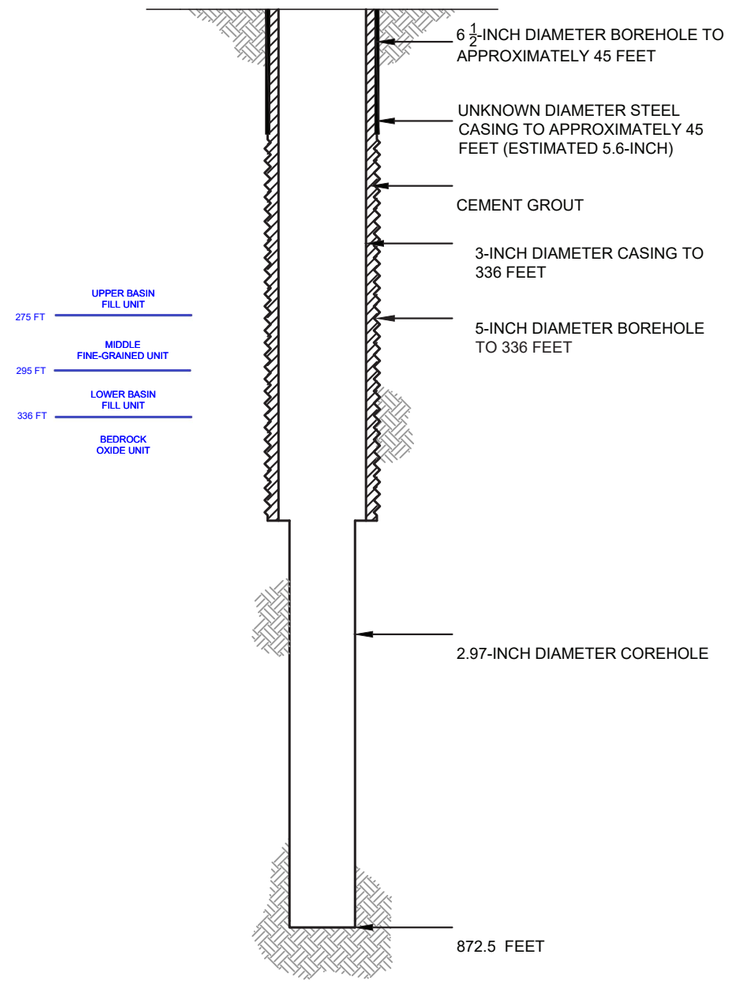
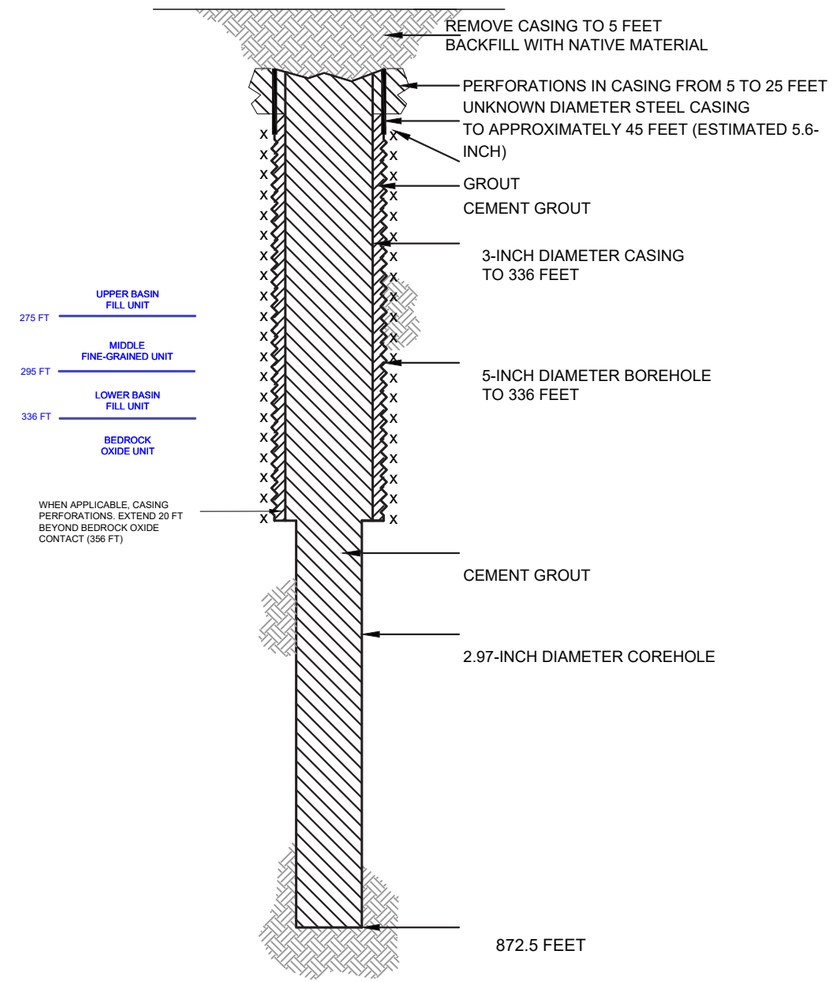
AS-BUILT COREHOLE 343S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 343S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 343S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		344S

State	County
Arizona	Pinal

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

Latitude 33.05211183

Surface Location

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

Longitude -111.4248404

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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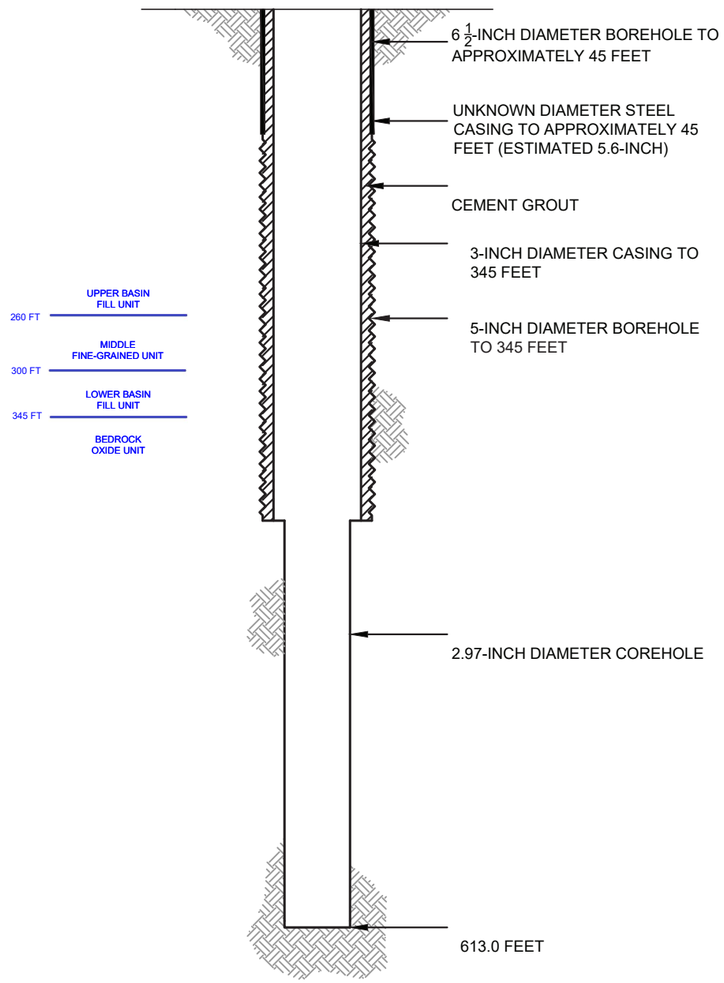
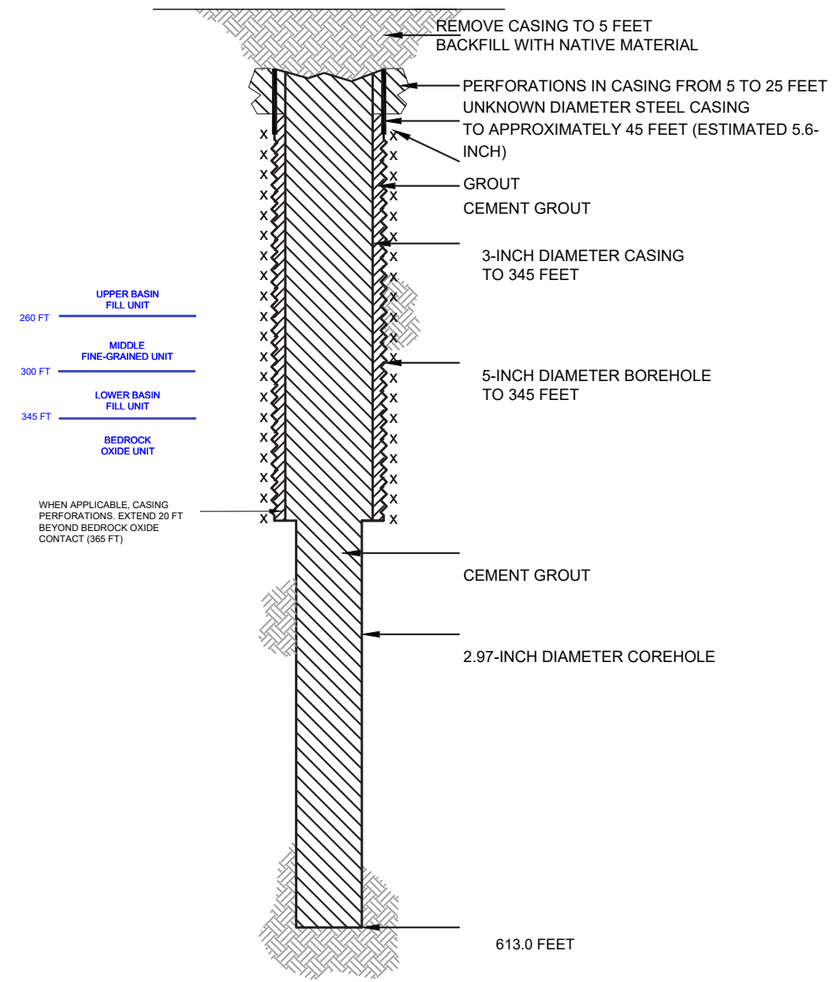
AS-BUILT COREHOLE 344S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 344S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 344S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		345S

State	County
Arizona	Pinal

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

Latitude 33.05271812

Longitude -111.4276927

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Dan Johnson, VP - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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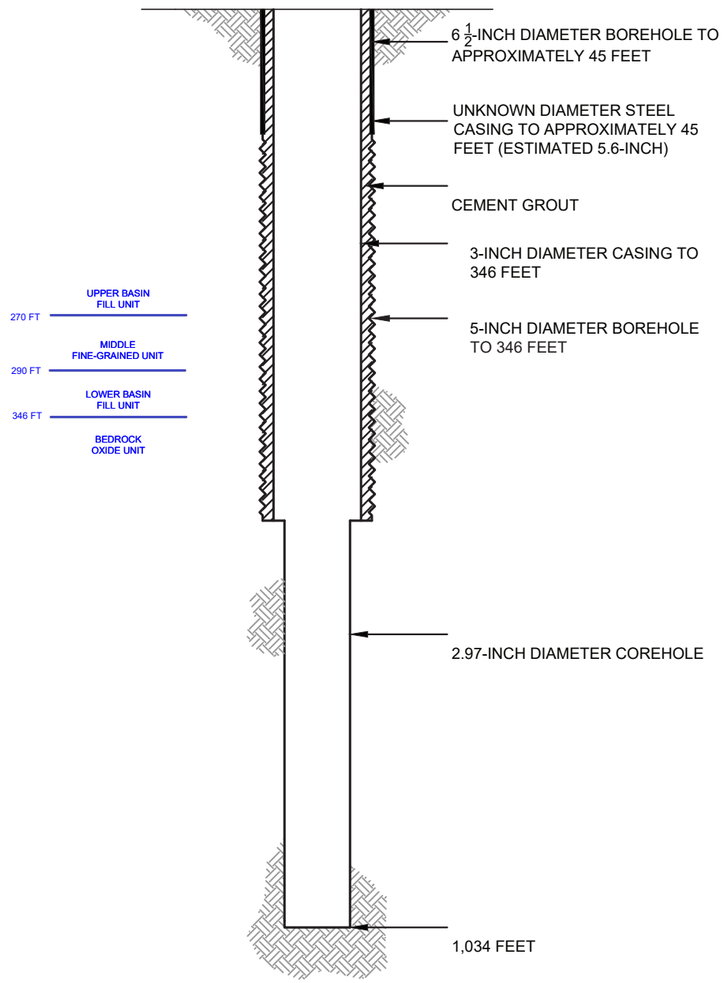
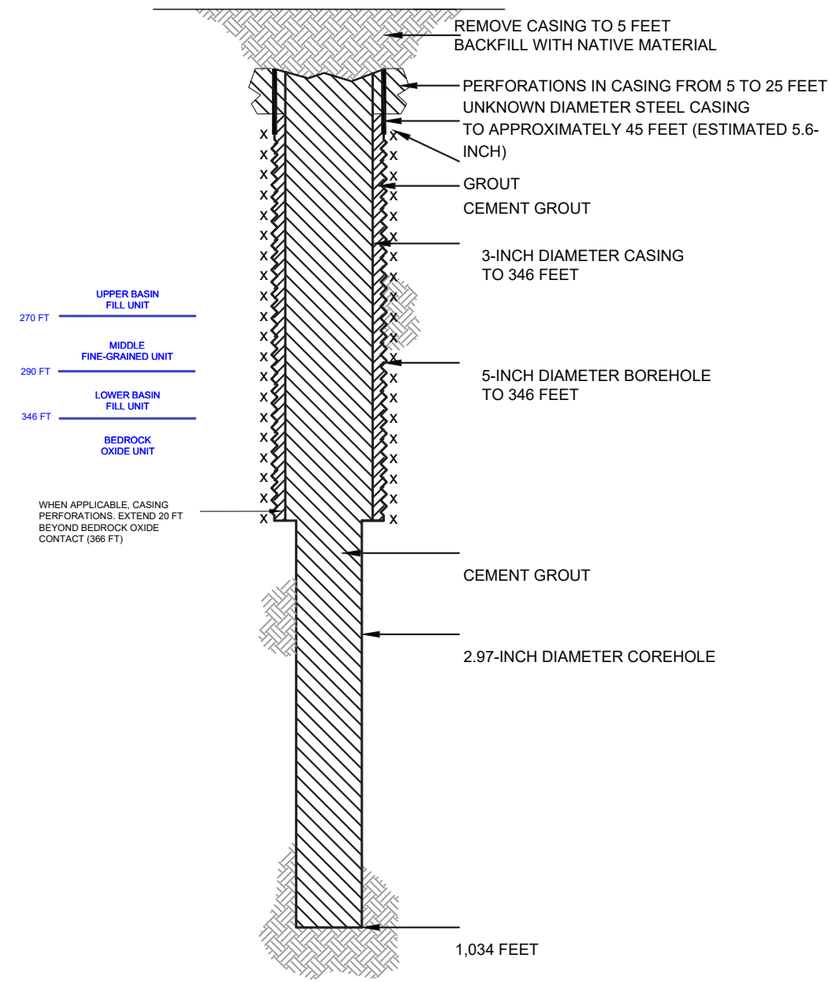
AS-BUILT COREHOLE 345S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 345S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 345S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		346S

State	County
Arizona	Pinal

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

Latitude 33.05272132

Longitude -111.4285086

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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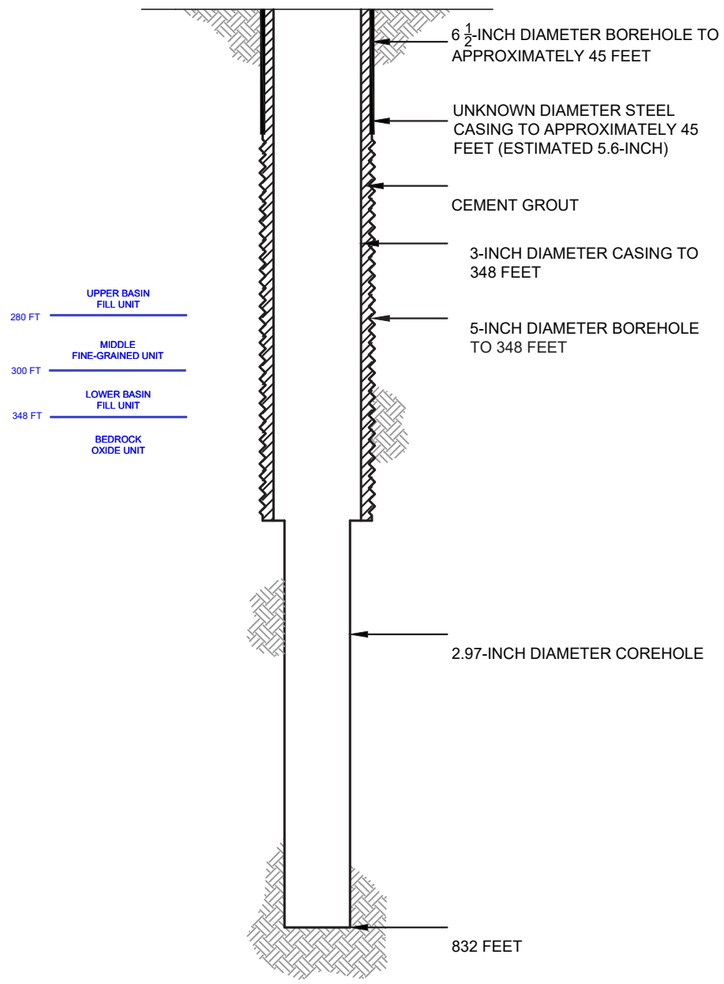
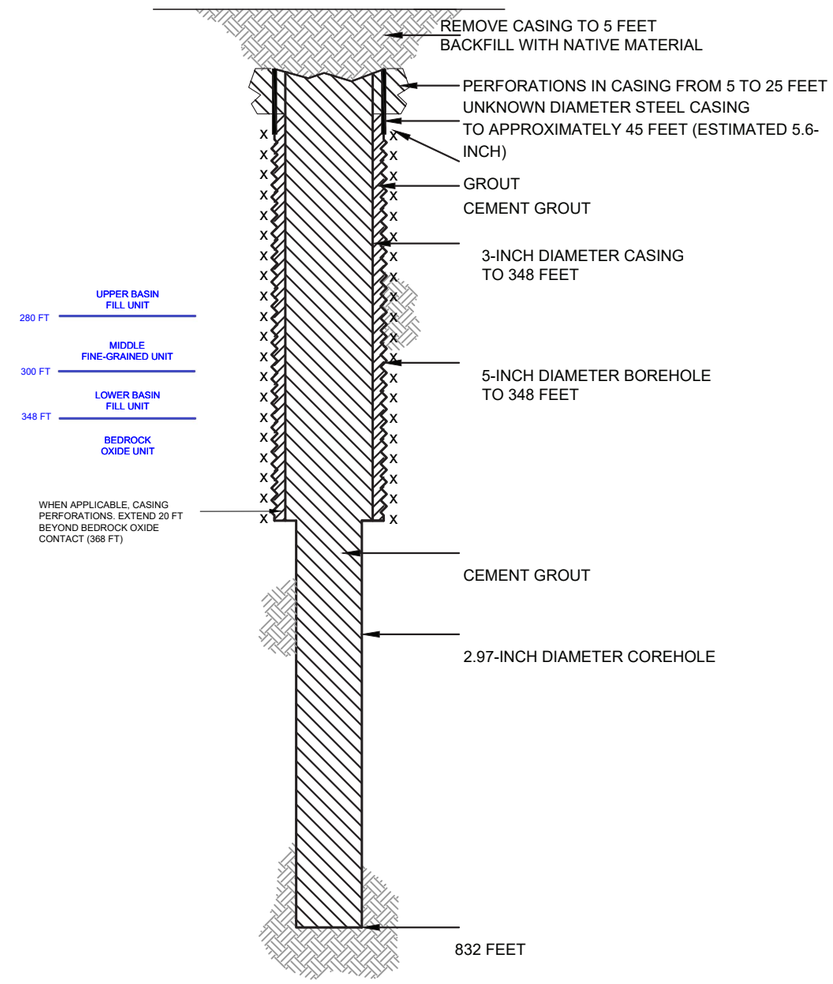
AS-BUILT COREHOLE 346S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 346S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 346S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		347S

State	County
Arizona	Pinal

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

Latitude 33.05272451

Longitude -111.4293245

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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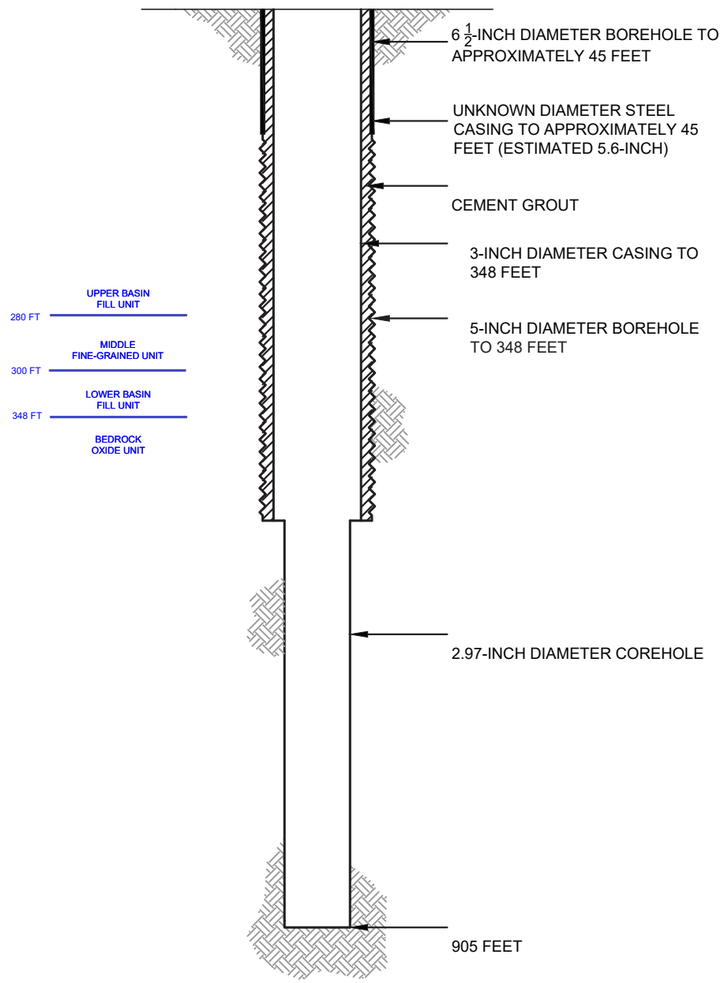
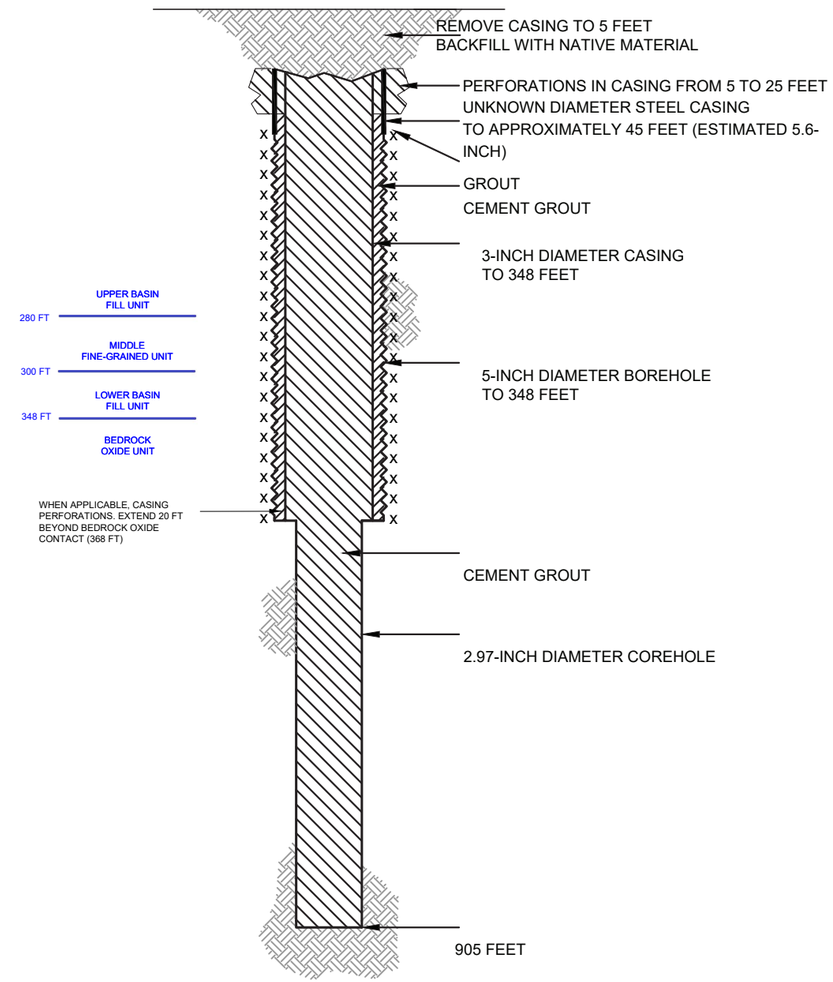
AS-BUILT COREHOLE 347S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 347S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 347S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

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R9UIC-AZ3-FY11-1		348S

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If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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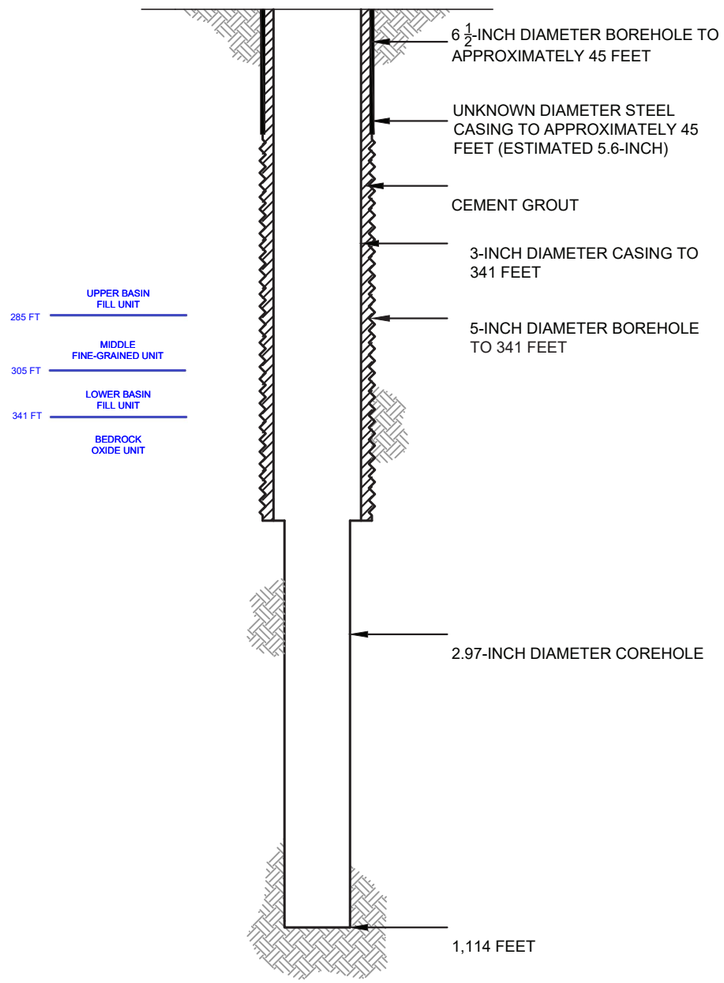
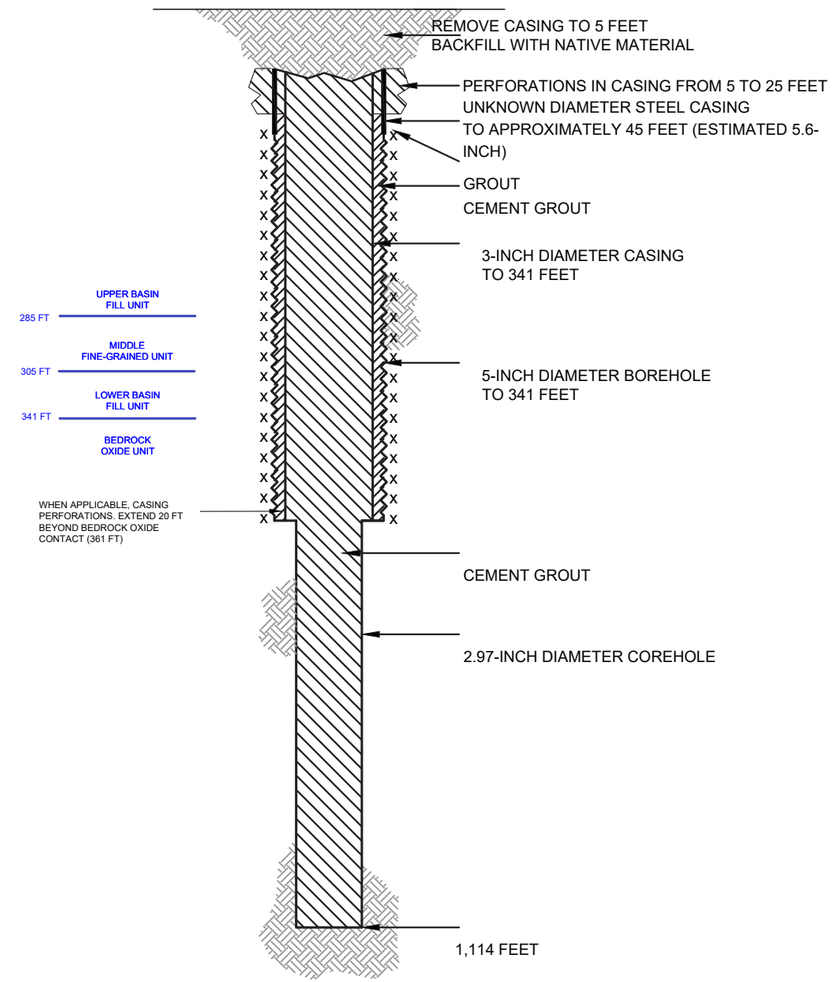
AS-BUILT COREHOLE 348S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 348S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 348S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		349S

State	County
Arizona	Pinal

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

Latitude 33.05213104

Longitude -111.4297357

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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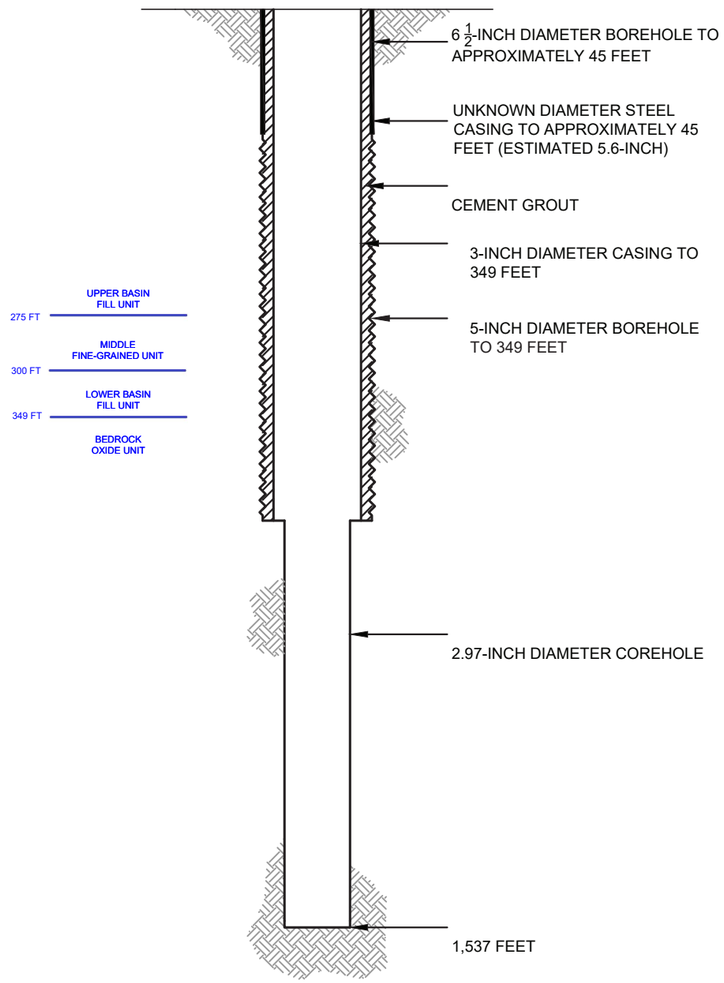
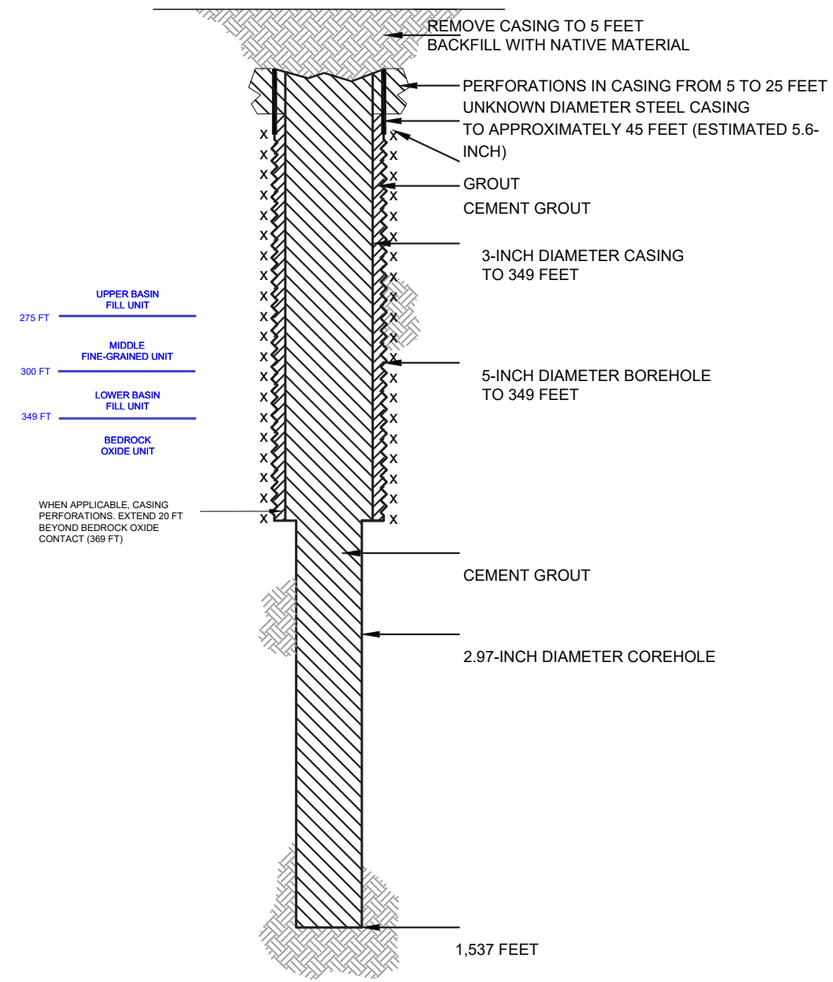
AS-BUILT COREHOLE 349S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 349S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 349S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		150S

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.05096195

Longitude -111.4363024

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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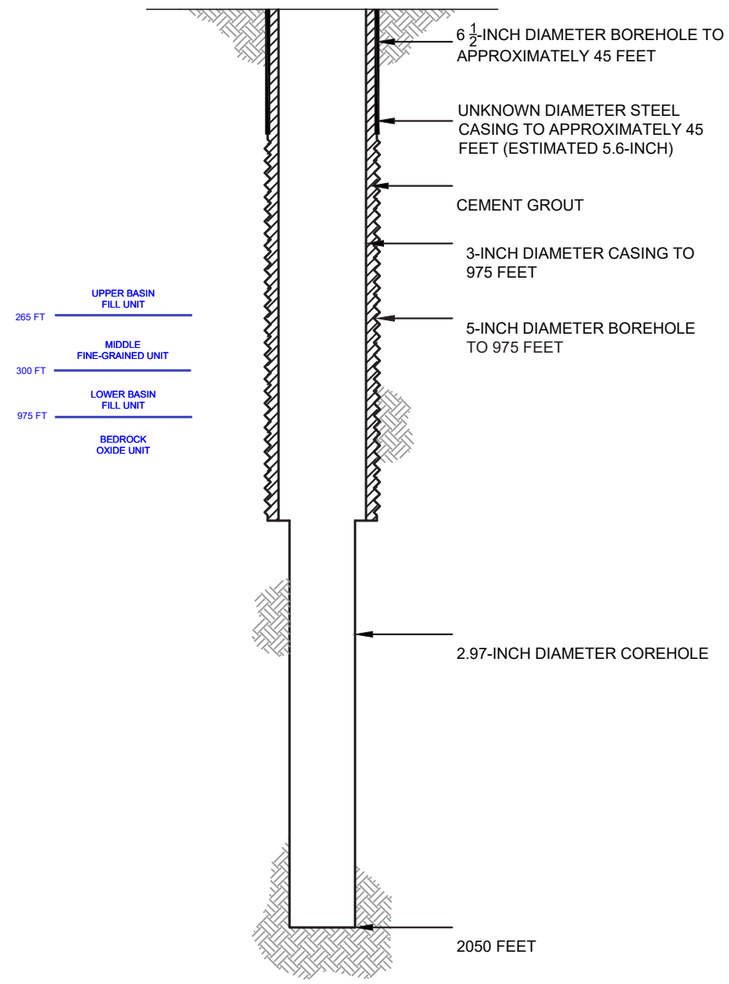
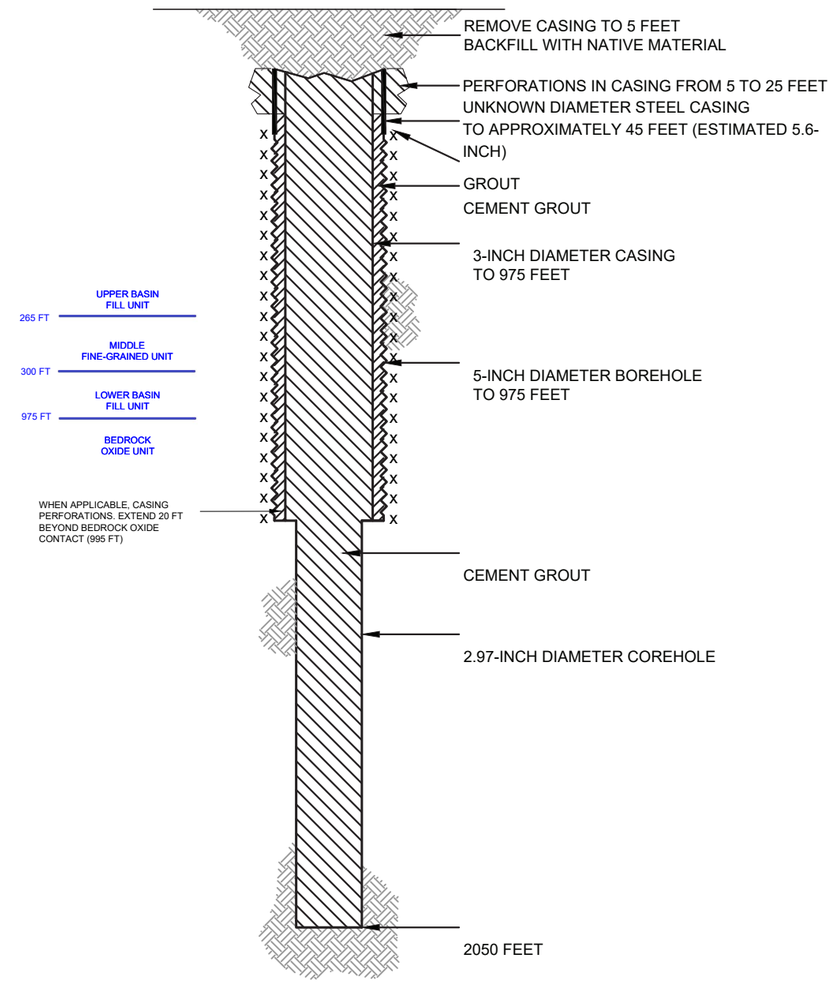
AS-BUILT COREHOLE 150S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 150S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 150S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		151

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.05335051

Longitude -111.4363064

_____ ft. from (N/S) _____ Line of quarter section

_____ ft. from (E/W) _____ Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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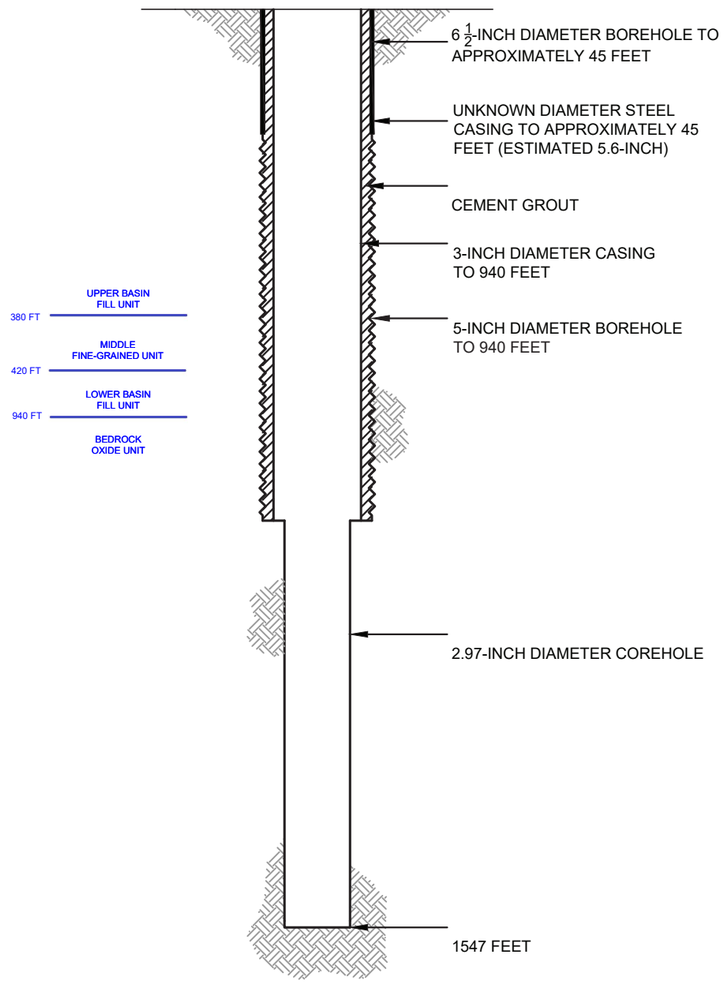
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

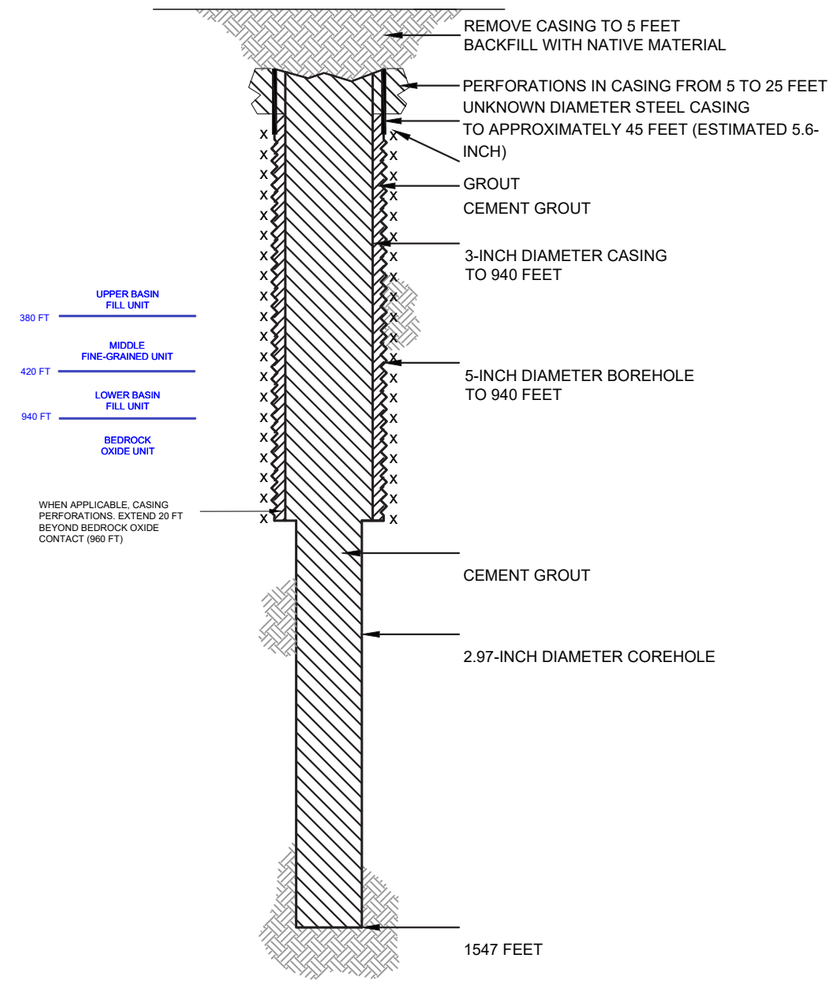
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 151



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 151



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 151 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		152

State	County
Arizona	Pinal

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

Latitude 33.05329794

Longitude -111.4264666

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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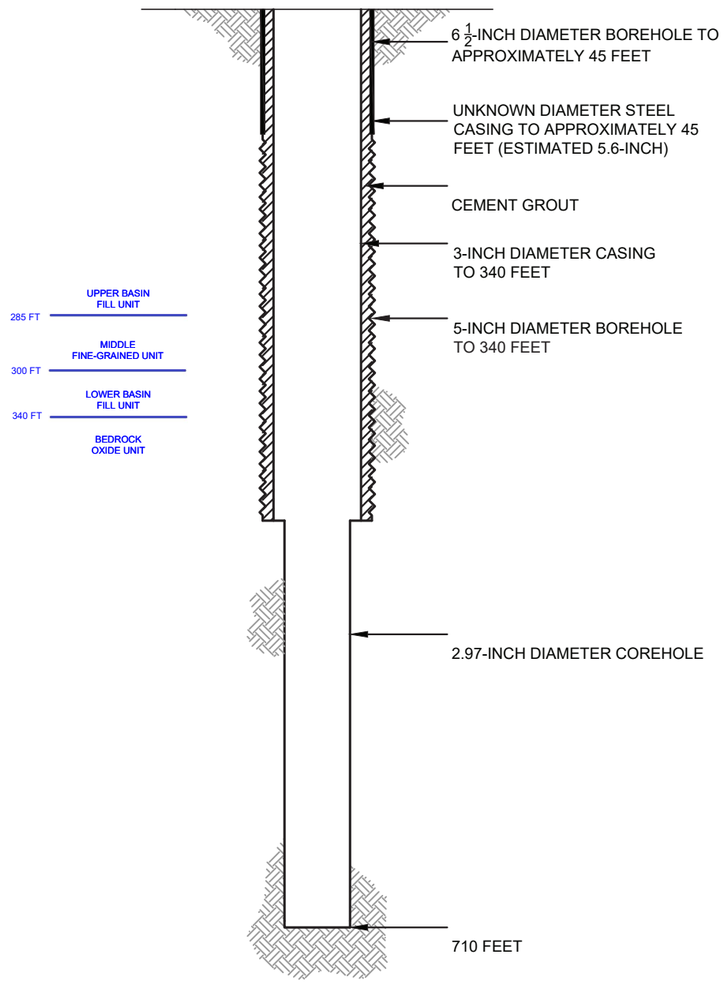
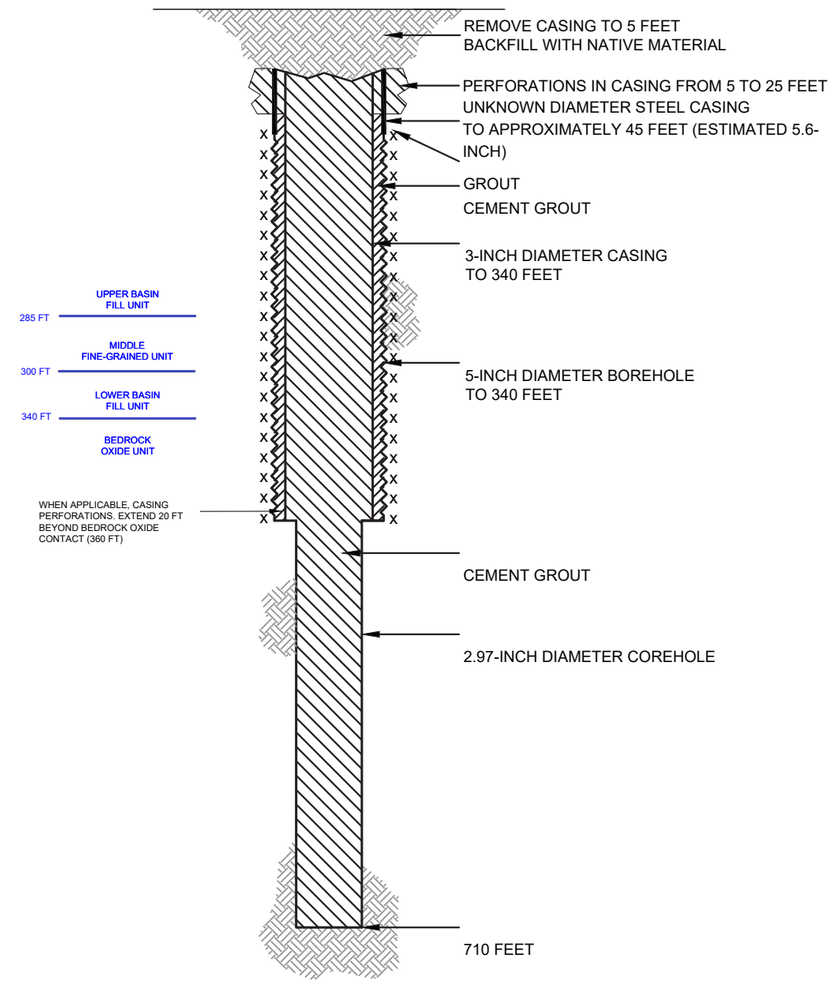
AS-BUILT COREHOLE 152



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 152



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 152 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

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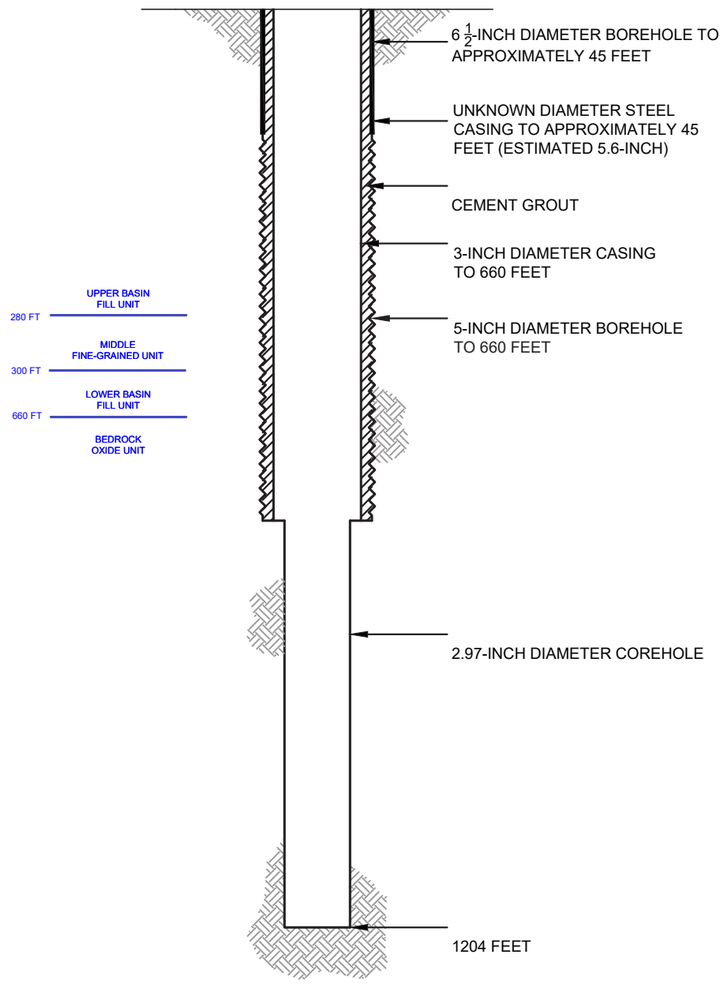
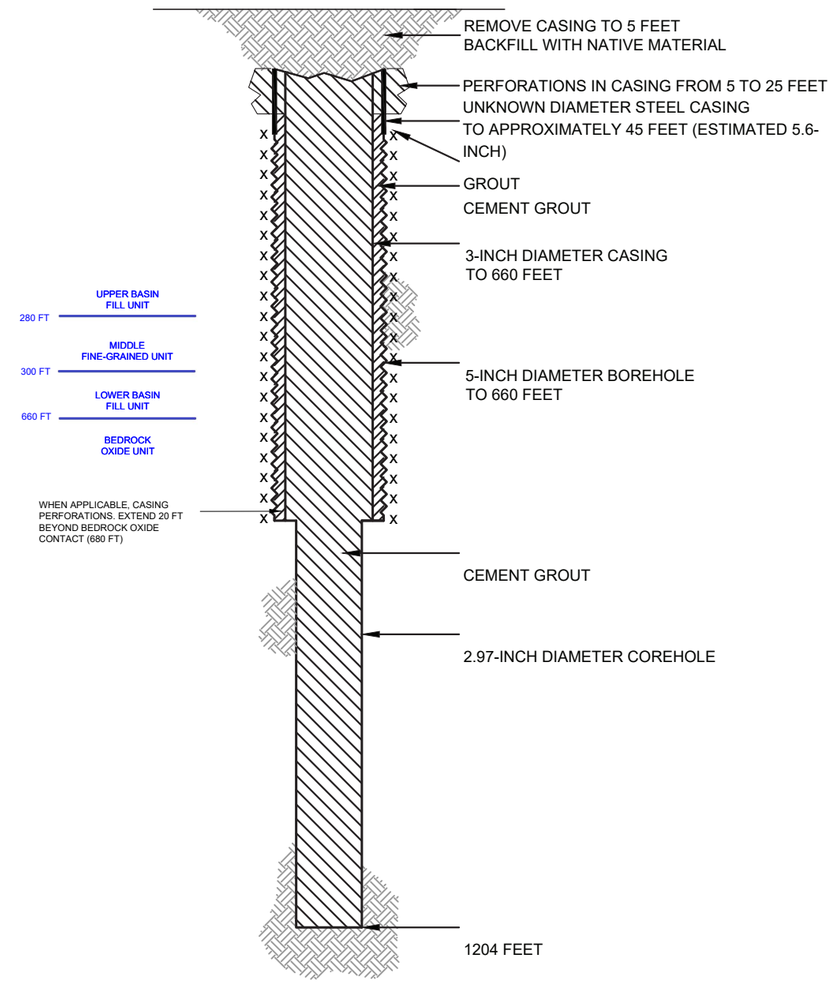
AS-BUILT COREHOLE 153



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 153



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 153 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		154S

State	County
Arizona	Pinal

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

Latitude 33.05091596

Longitude -111.4248542

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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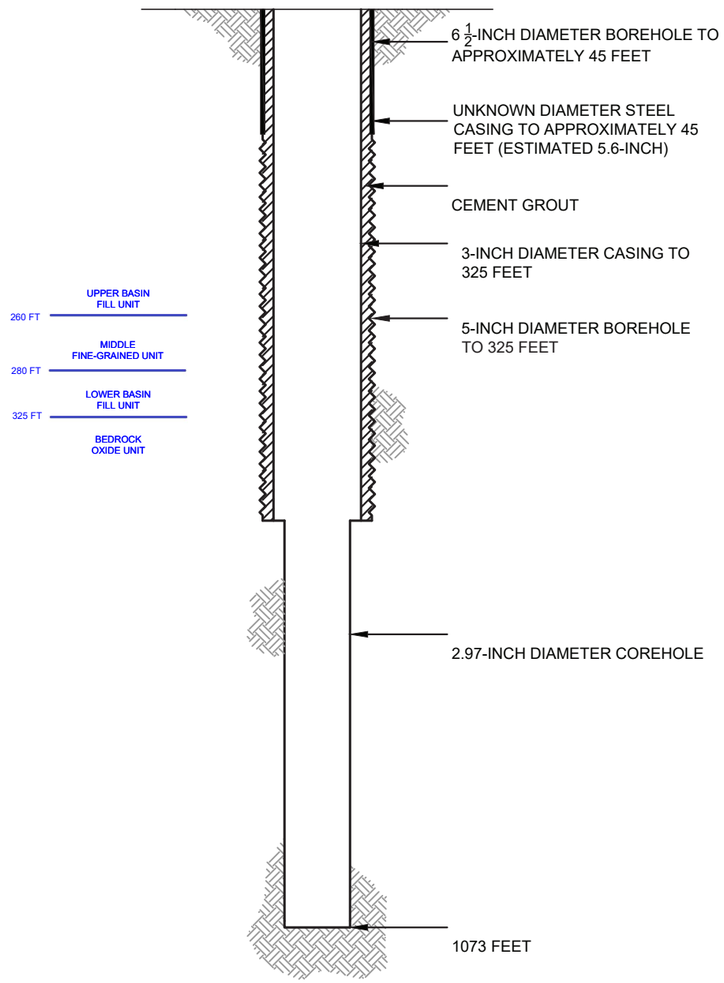
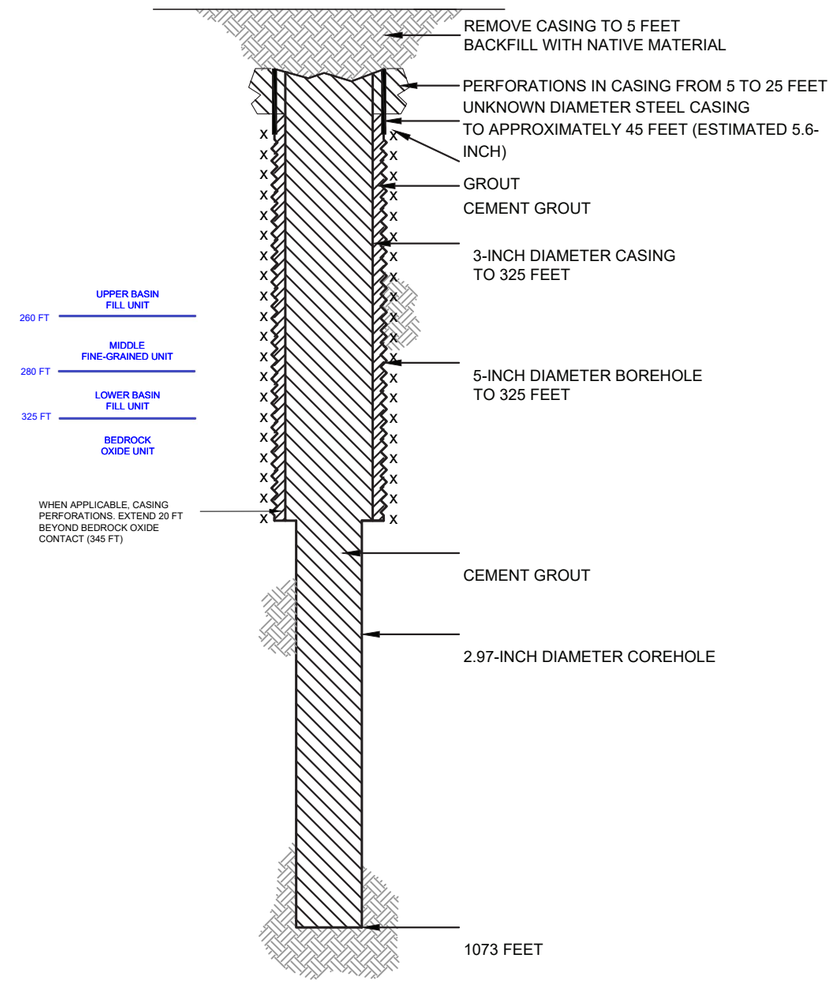
AS-BUILT COREHOLE 154S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 154S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 154S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		155S

State	County
Arizona	Pinal

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

Latitude 33.05089951

Surface Location

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

Longitude -111.4231928

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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

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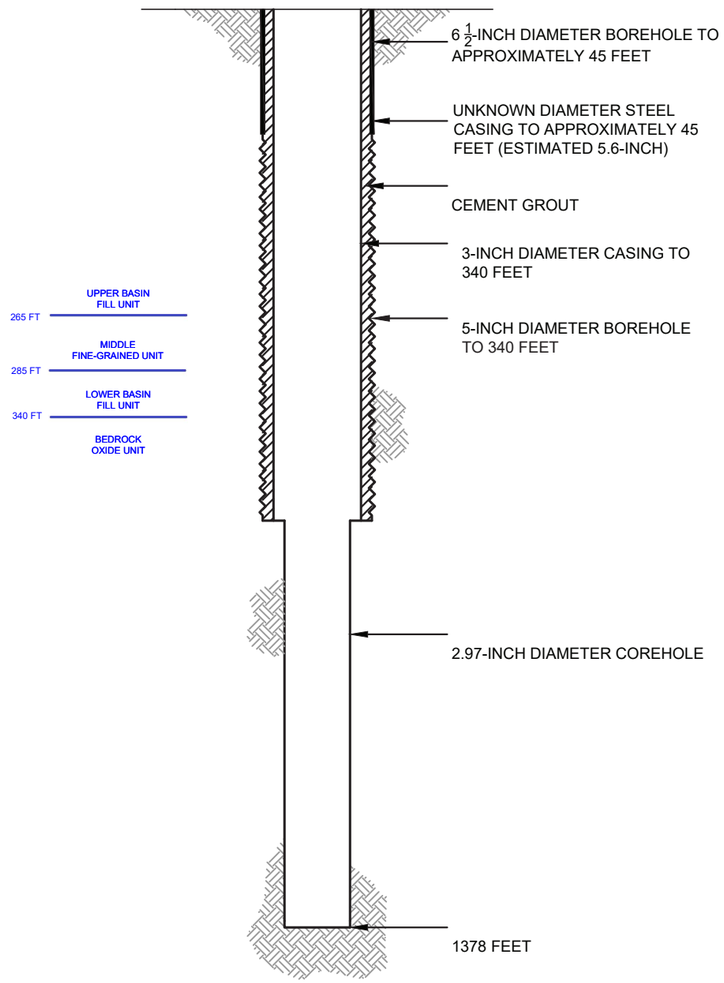
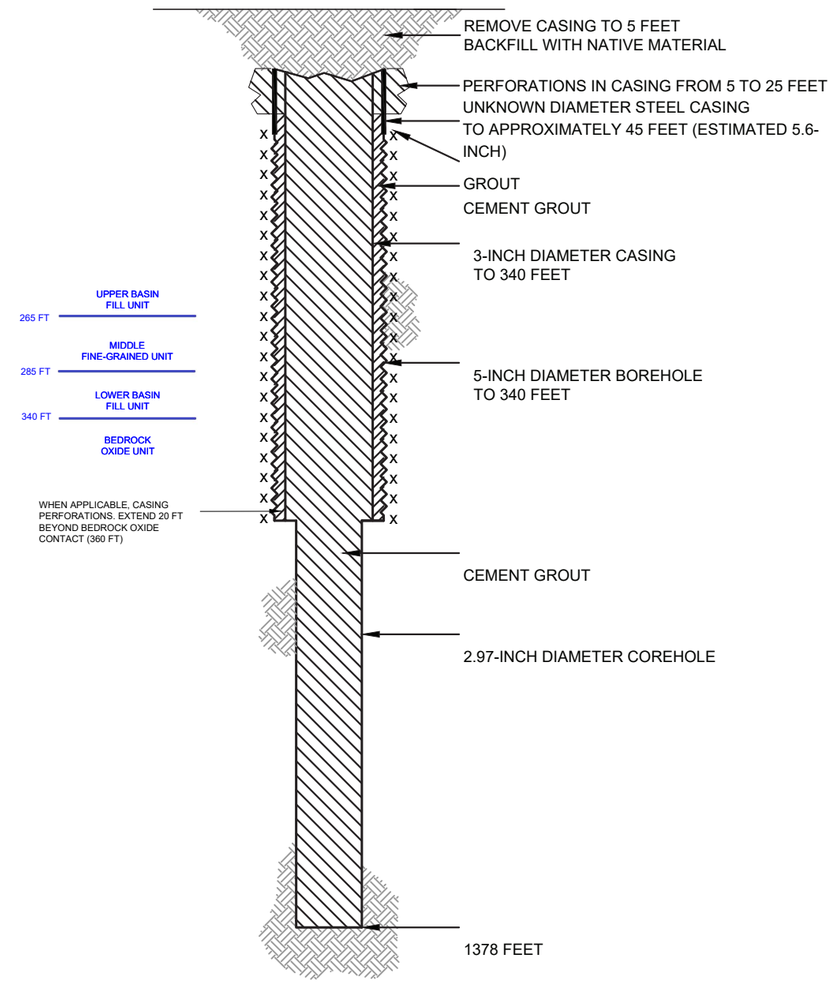
AS-BUILT COREHOLE 155S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 155S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 155S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		156S

State	County
Arizona	Pinal

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

Latitude 33.05210632

Longitude -111.4272816

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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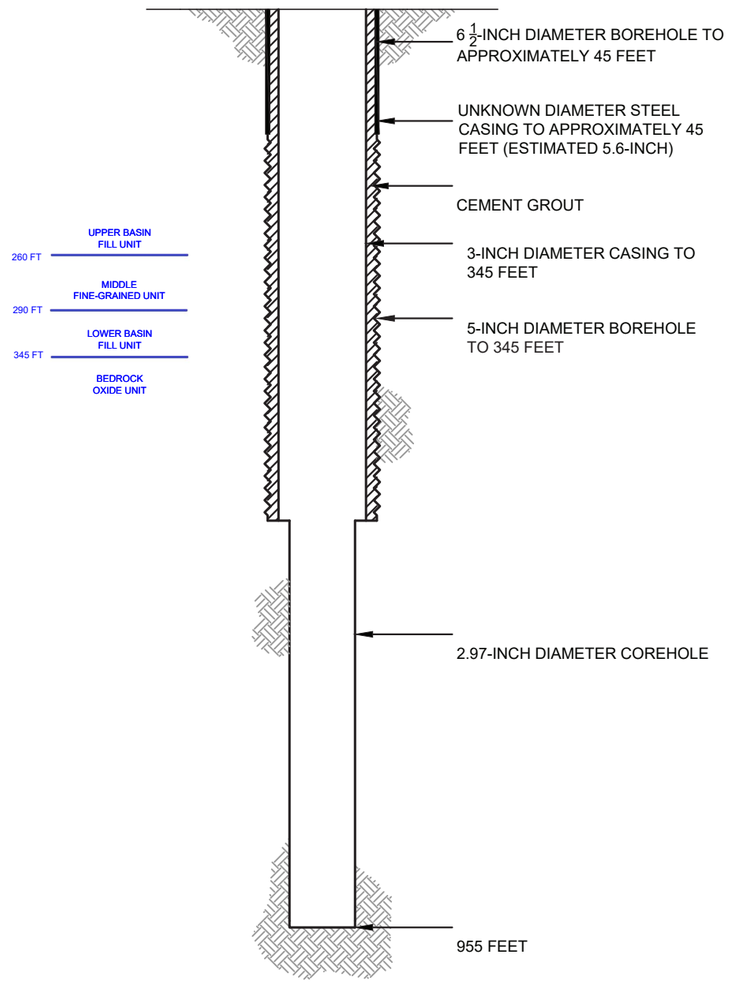
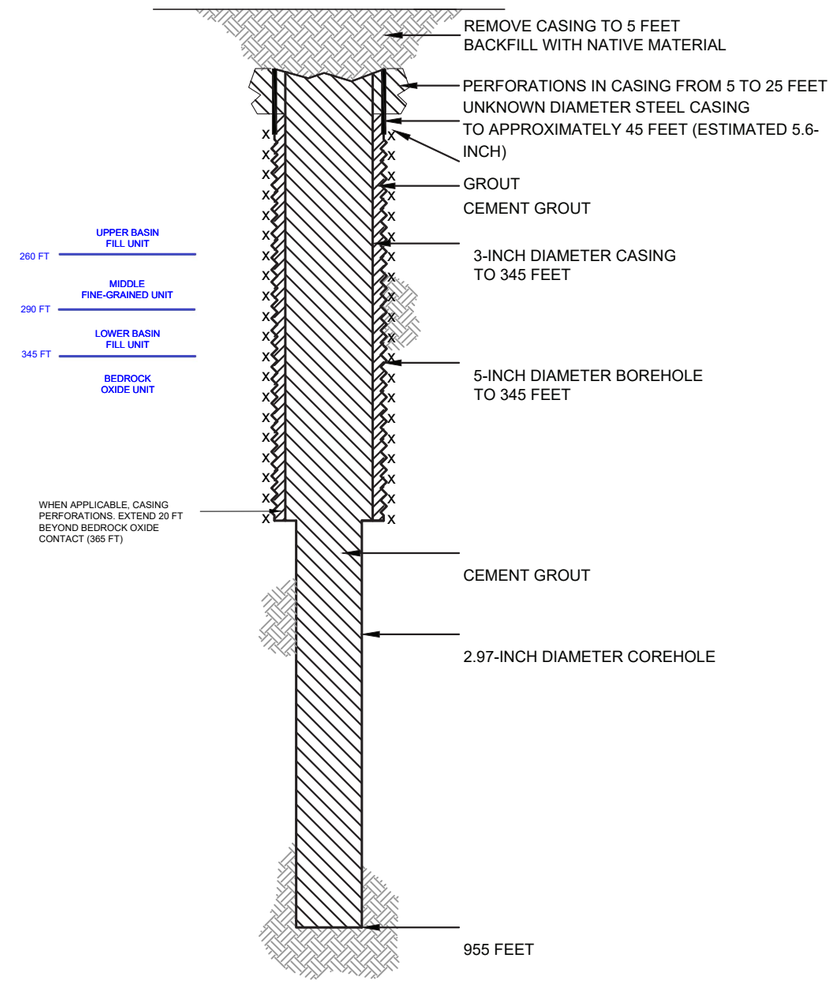
AS-BUILT COREHOLE 156S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 156S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 156S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		165MF

State	County
Arizona	Pinal

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

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.0438169

Longitude -111.4362971

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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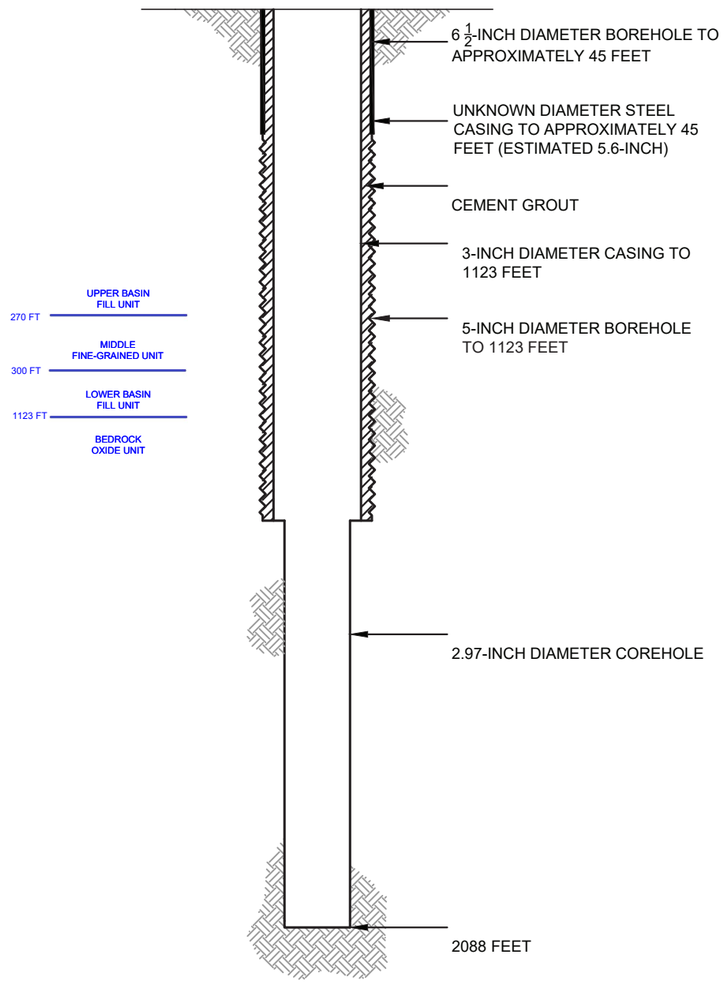
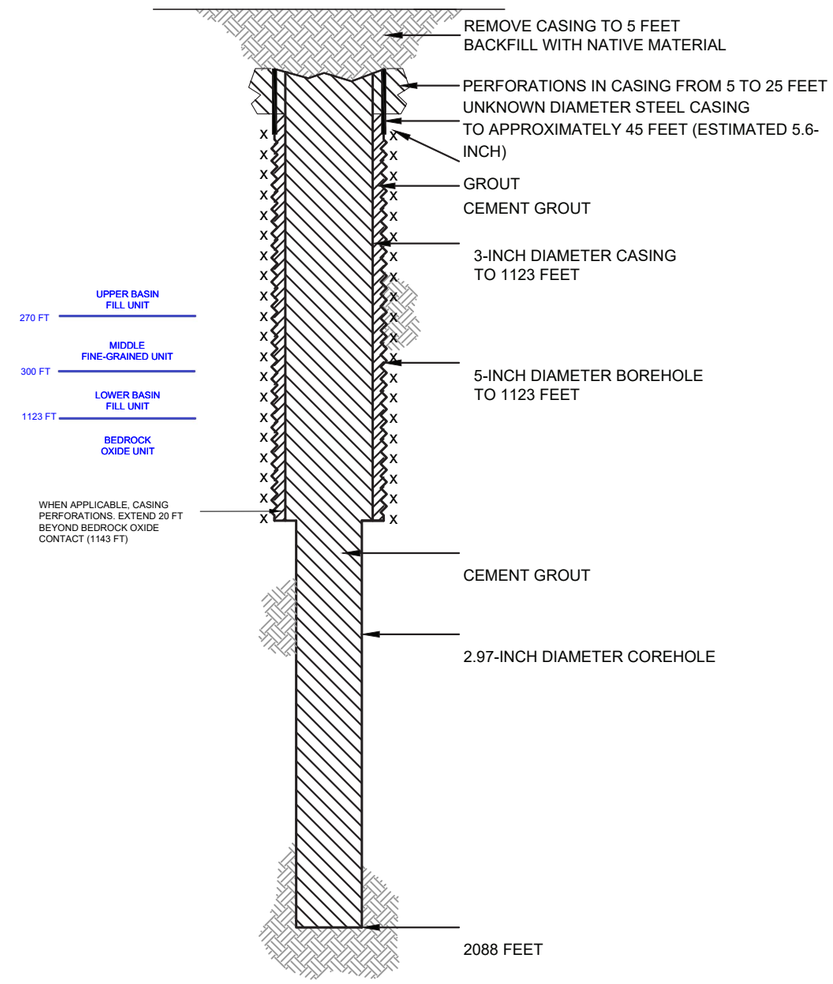
AS-BUILT COREHOLE 165MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 165MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 165MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		210

State	County
Arizona	Pinal

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

Latitude 33.05510572

Longitude -111.4361483

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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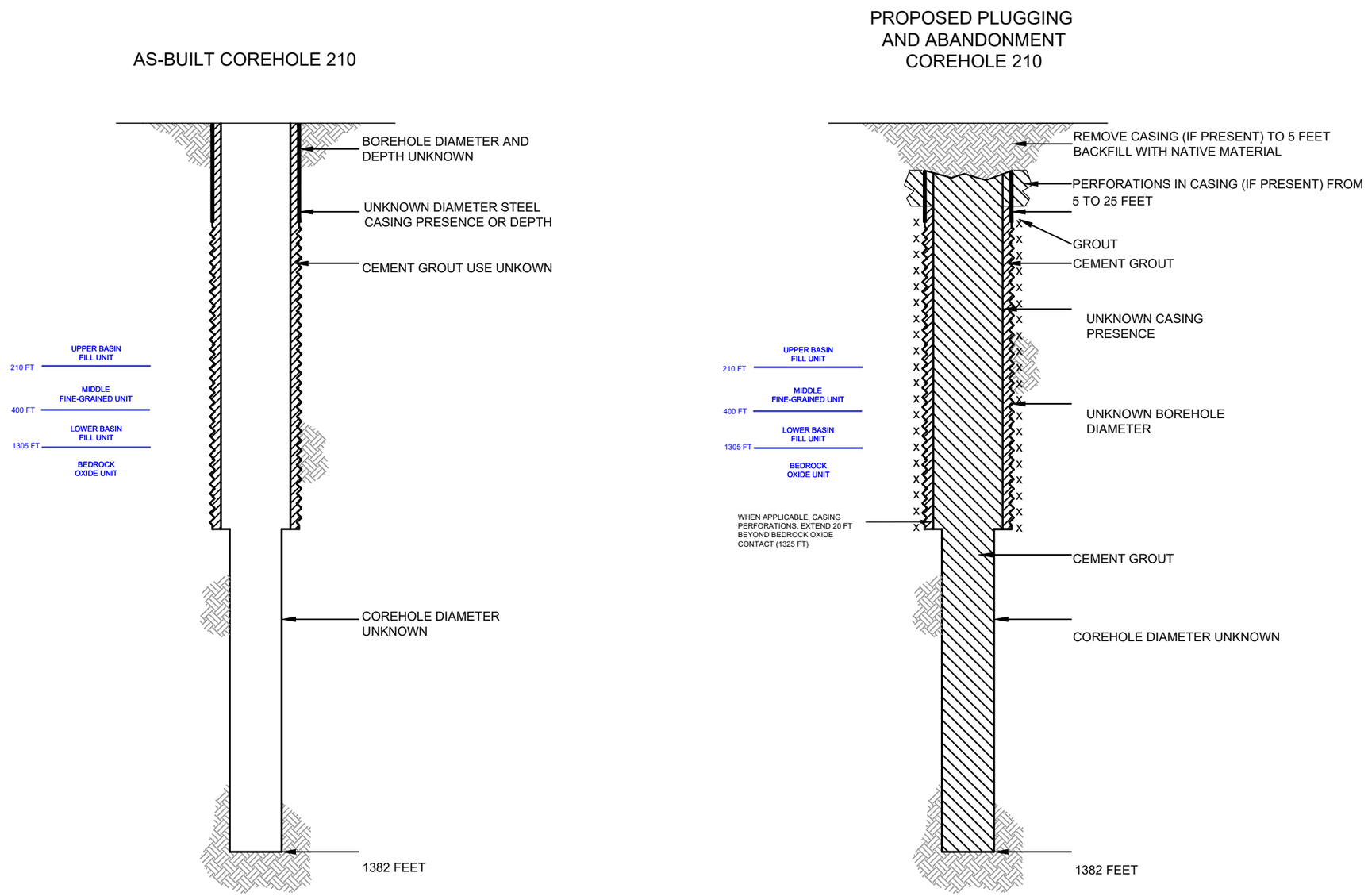

HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 210 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		254S

State	County
Arizona	Pinal

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

Latitude 33.05152912

Longitude -111.429321

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

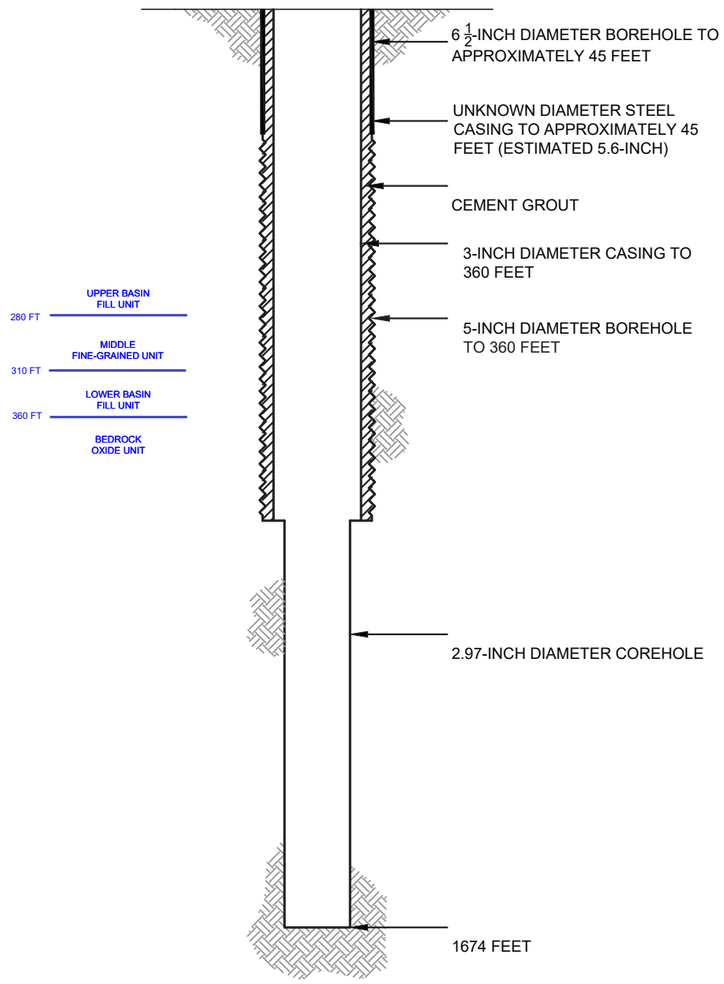
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

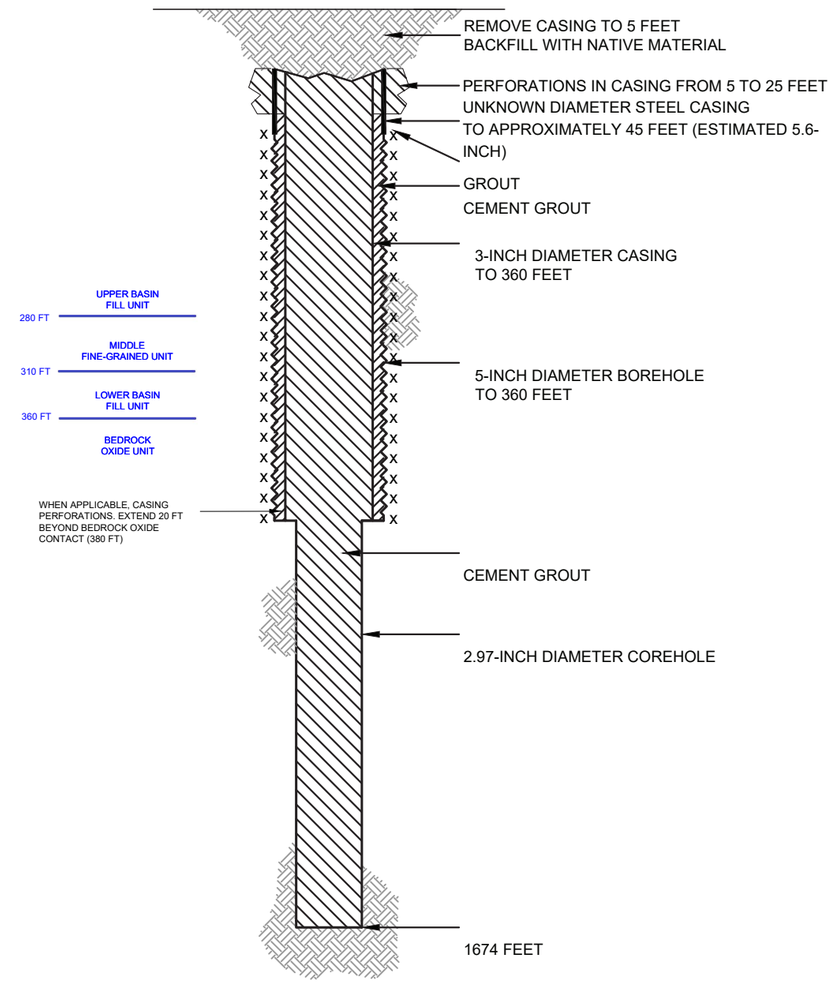
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 254S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 254S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 254S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		255S

State	County
Arizona	Pinal

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

Latitude 33.05212212

Longitude -111.4289313

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

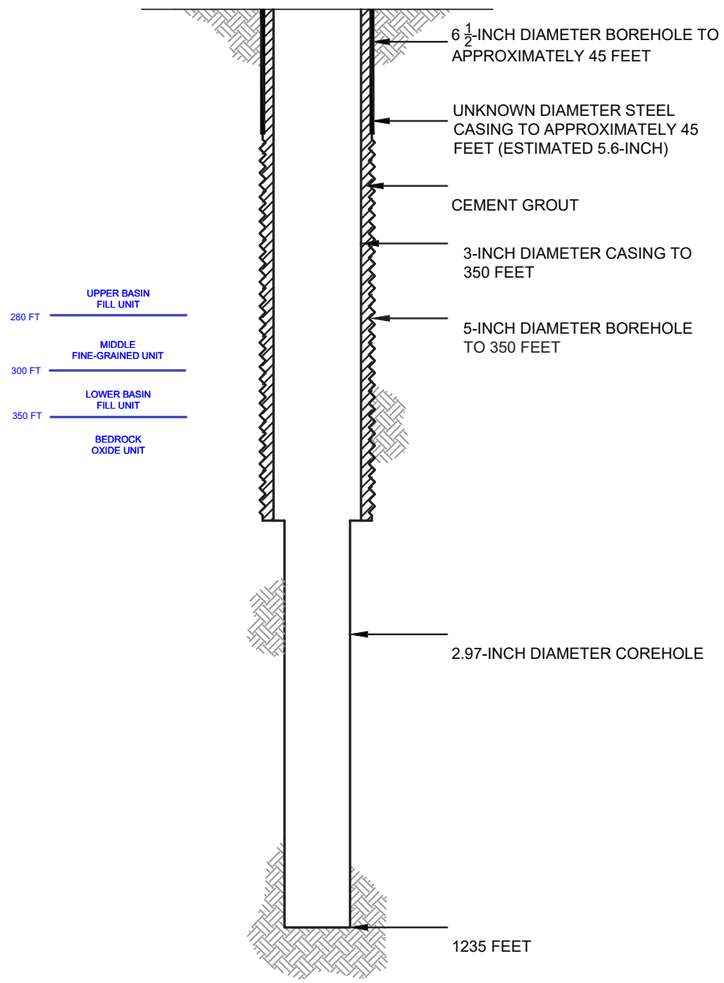
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

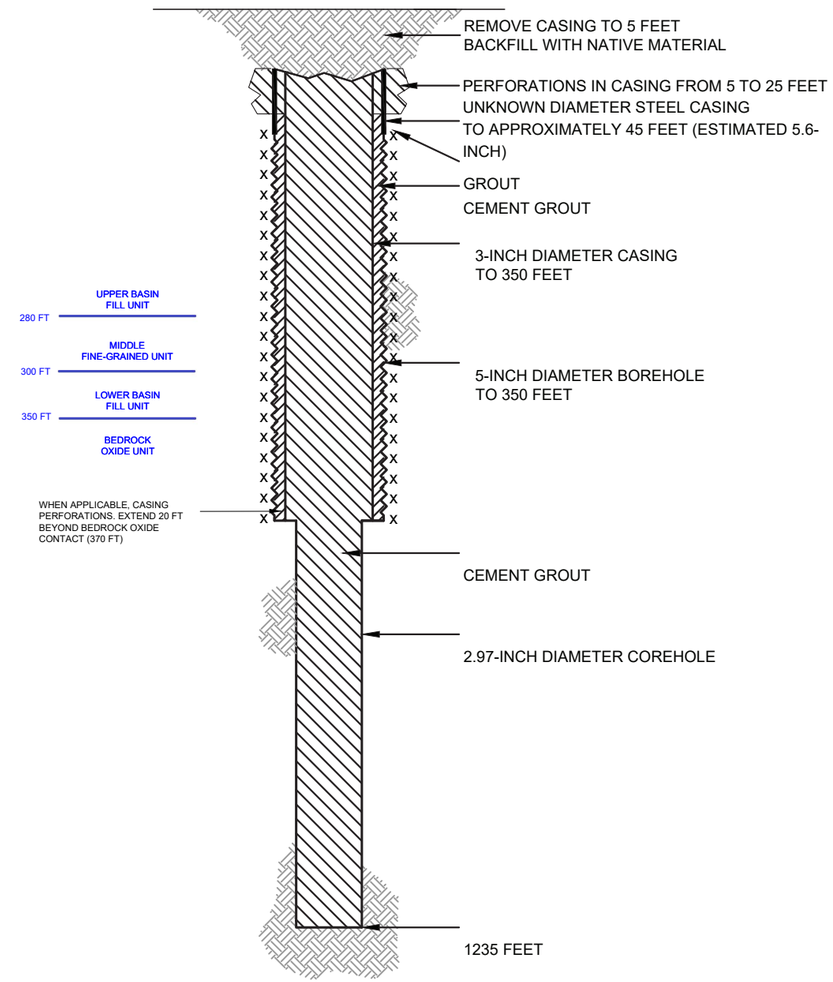
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 255S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 255S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 255S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		256S

State	County
Arizona	Pinal

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

Latitude 33.05092867

Longitude -111.4289291

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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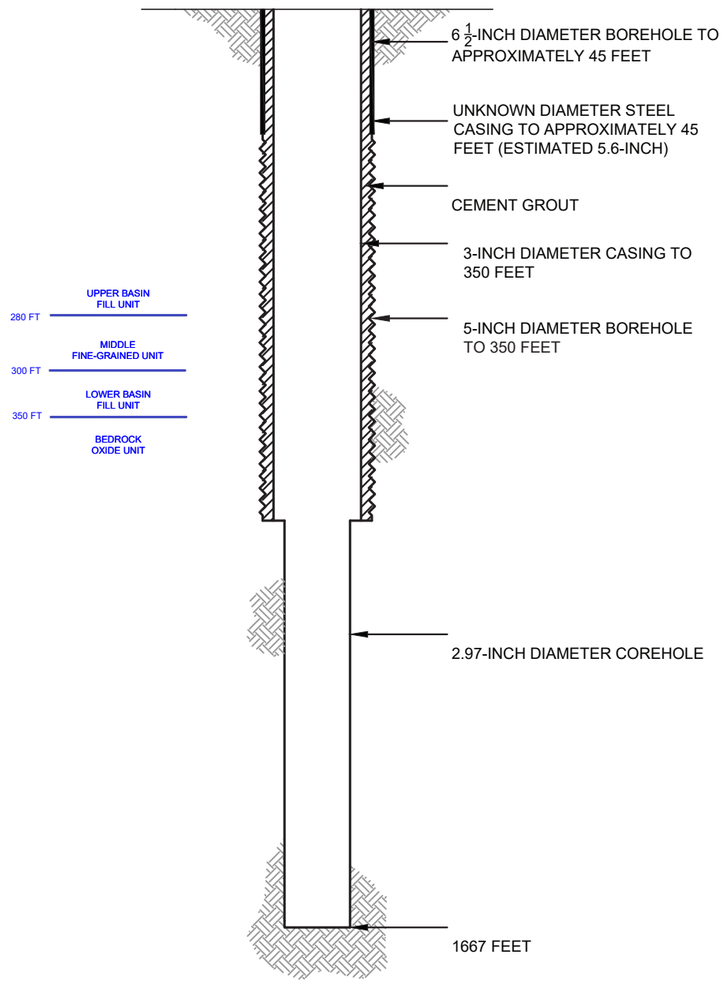
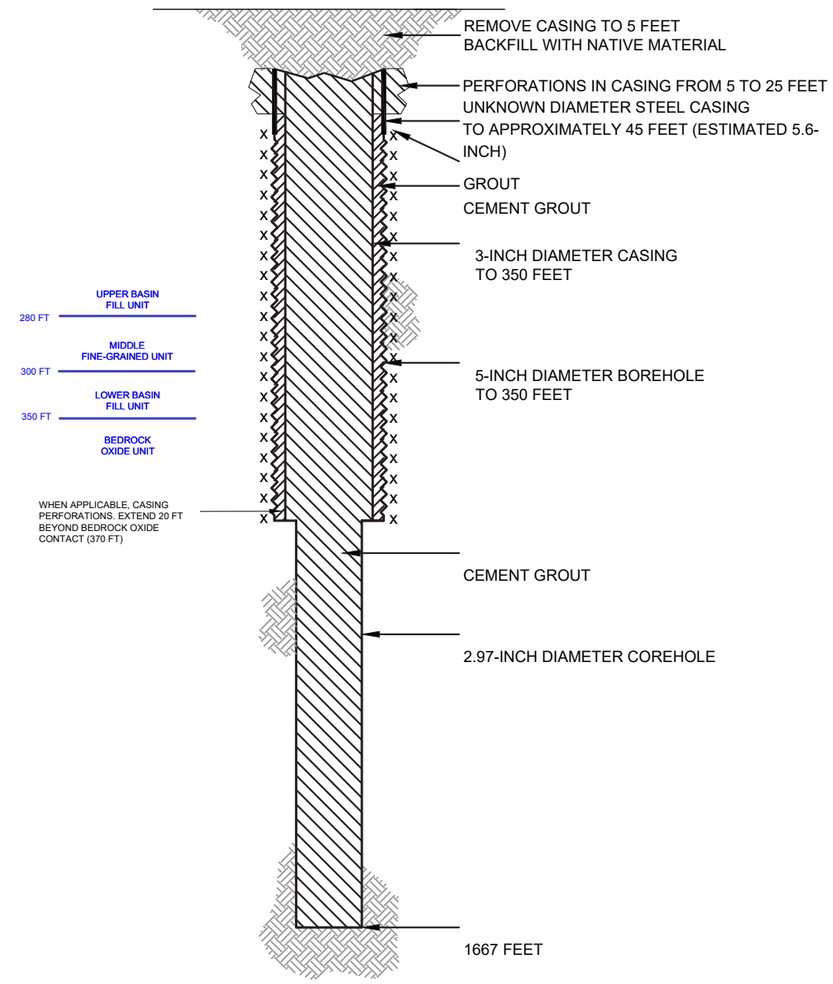
AS-BUILT COREHOLE 256S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 256S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 256S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		257S

State	County
Arizona	Pinal

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

Latitude 33.05033156

Longitude -111.4293246

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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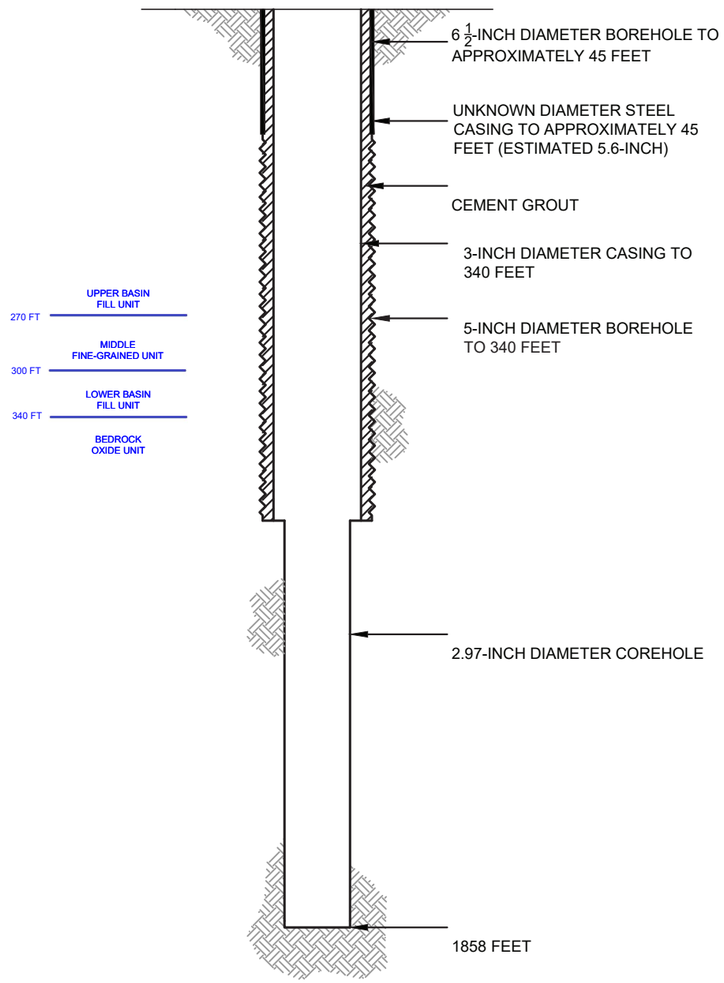
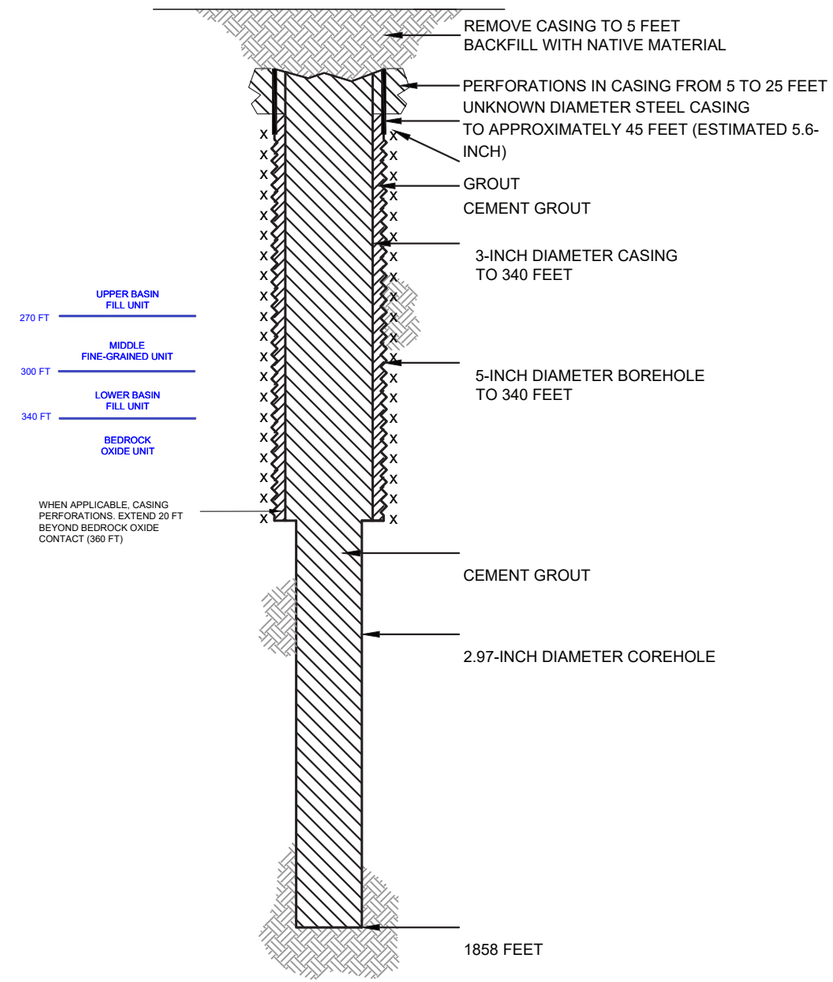
AS-BUILT COREHOLE 257S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 257S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 257S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		258S

State	County
Arizona	Pinal

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

Latitude 33.05151768

Longitude -111.4268913

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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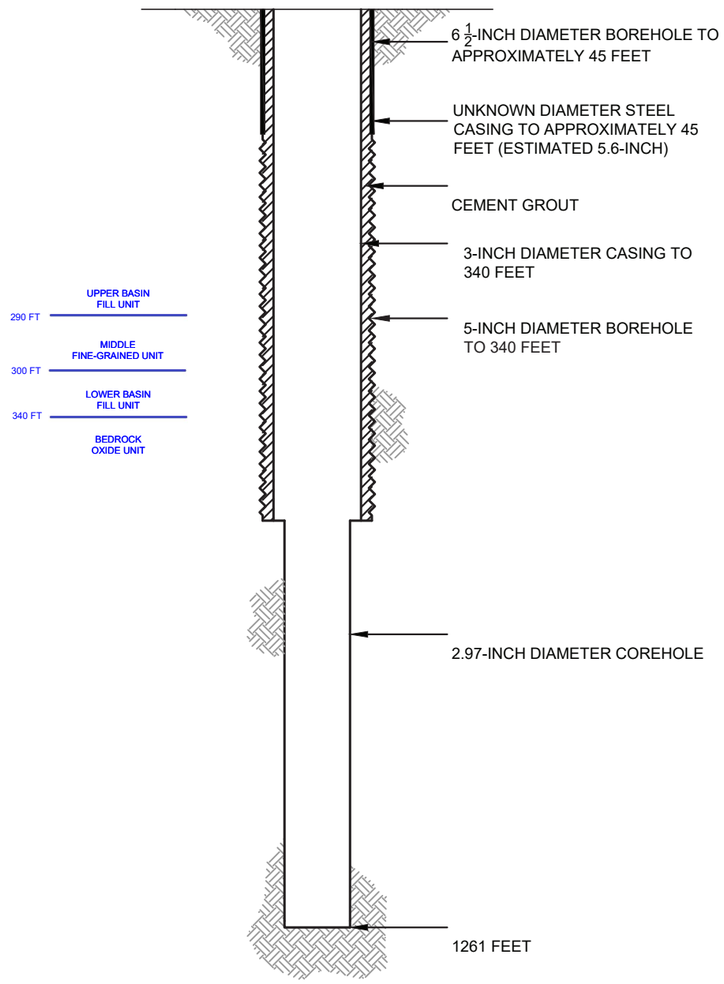
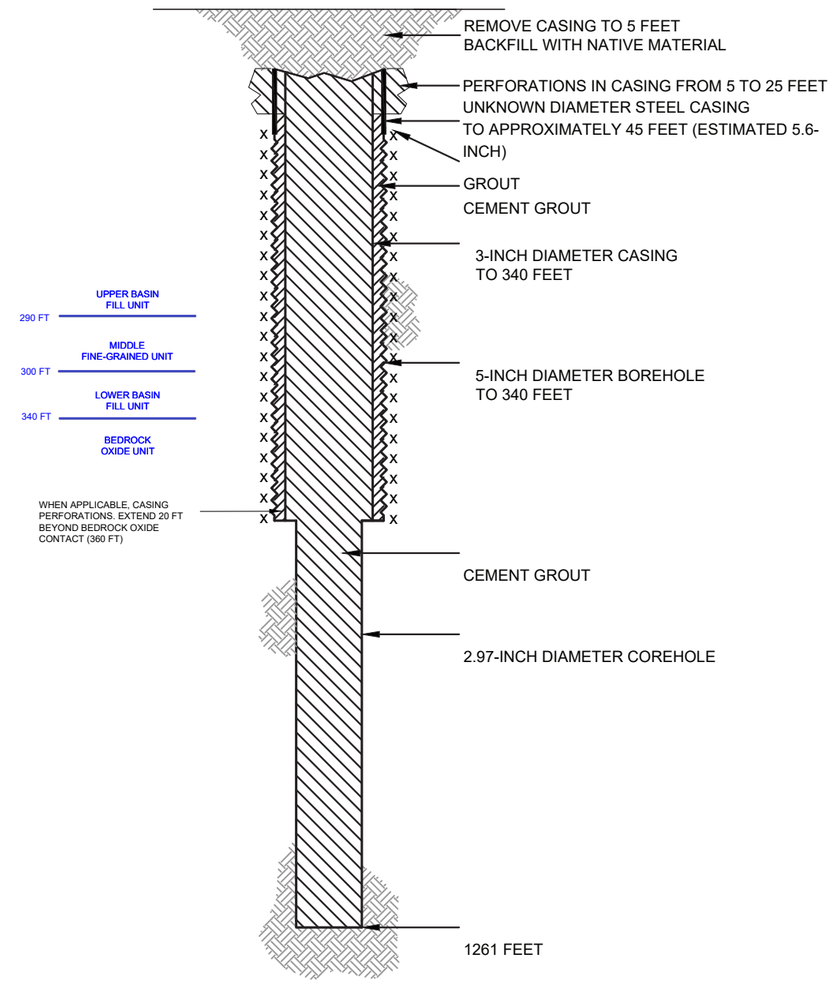
AS-BUILT COREHOLE 258S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 258S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 258S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		259S

State	County
Arizona	Pinal

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

Latitude 33.05091876

Longitude -111.427311

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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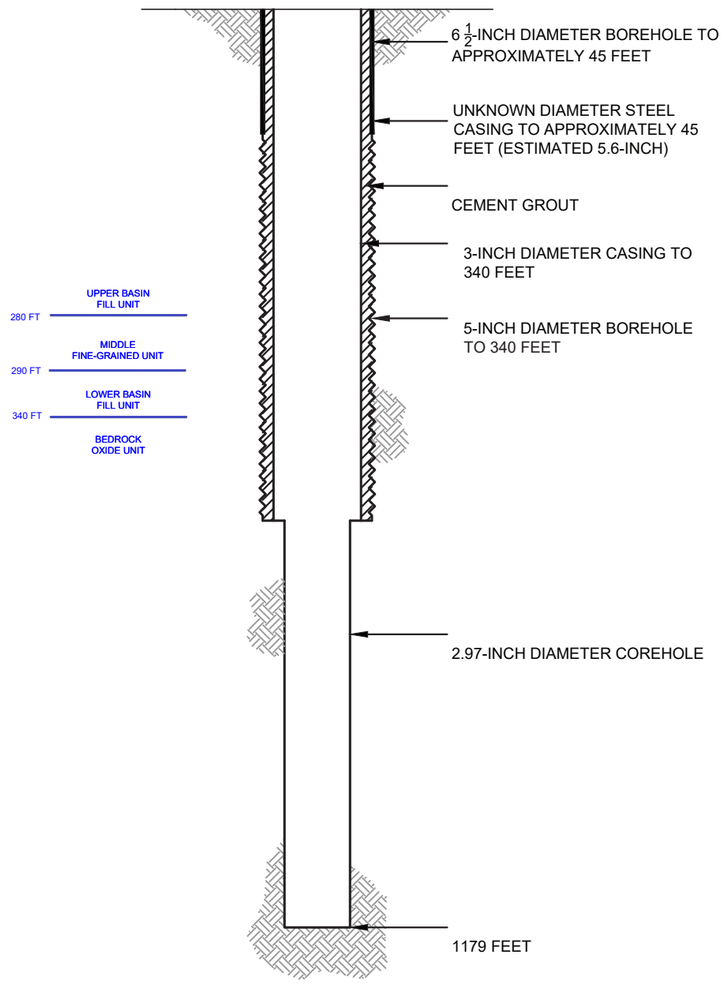
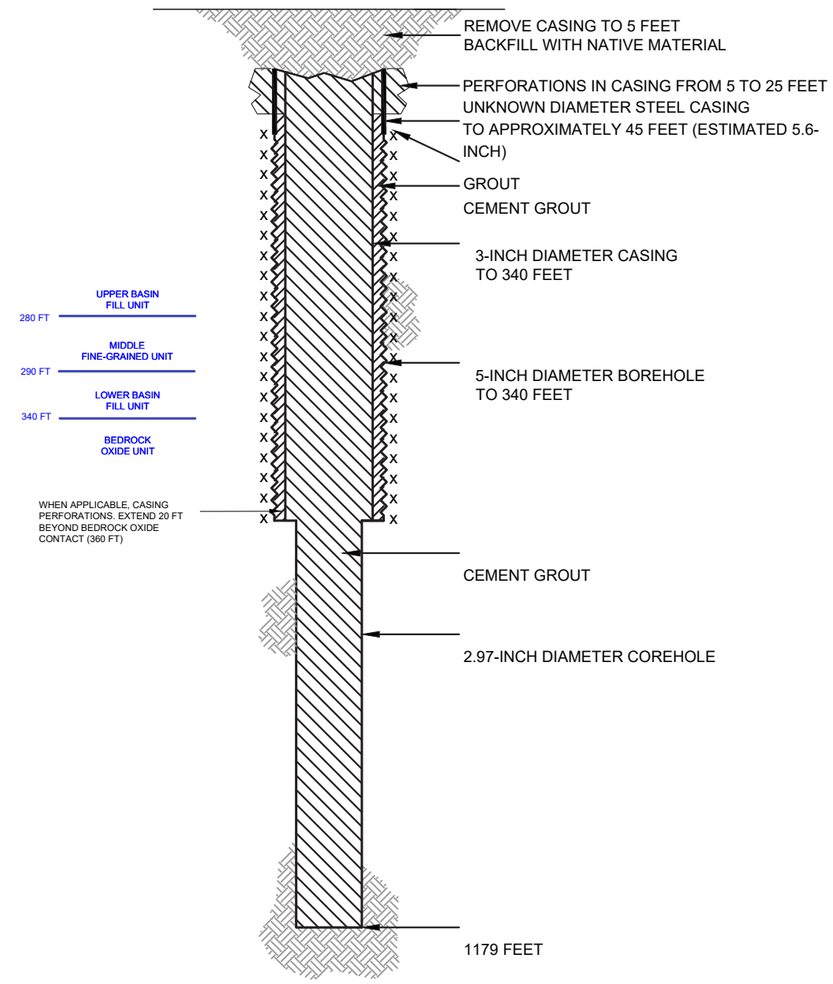
AS-BUILT COREHOLE 259S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 259S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 259S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		260

State	County
Arizona	Pinal

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

Latitude 33.05032997

Longitude -111.4277232

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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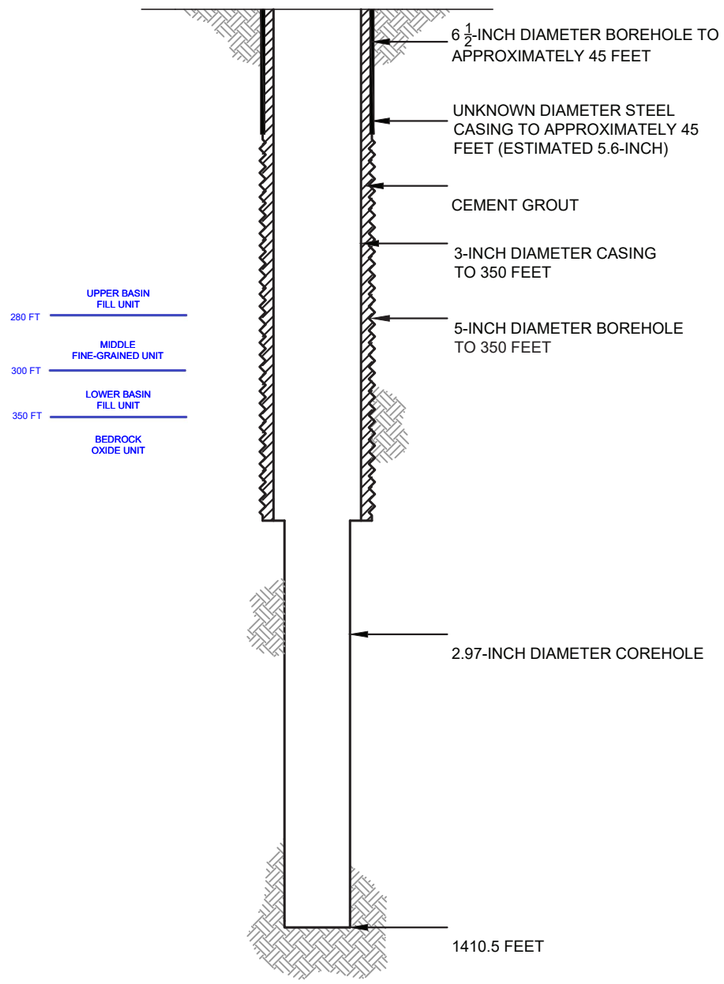
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

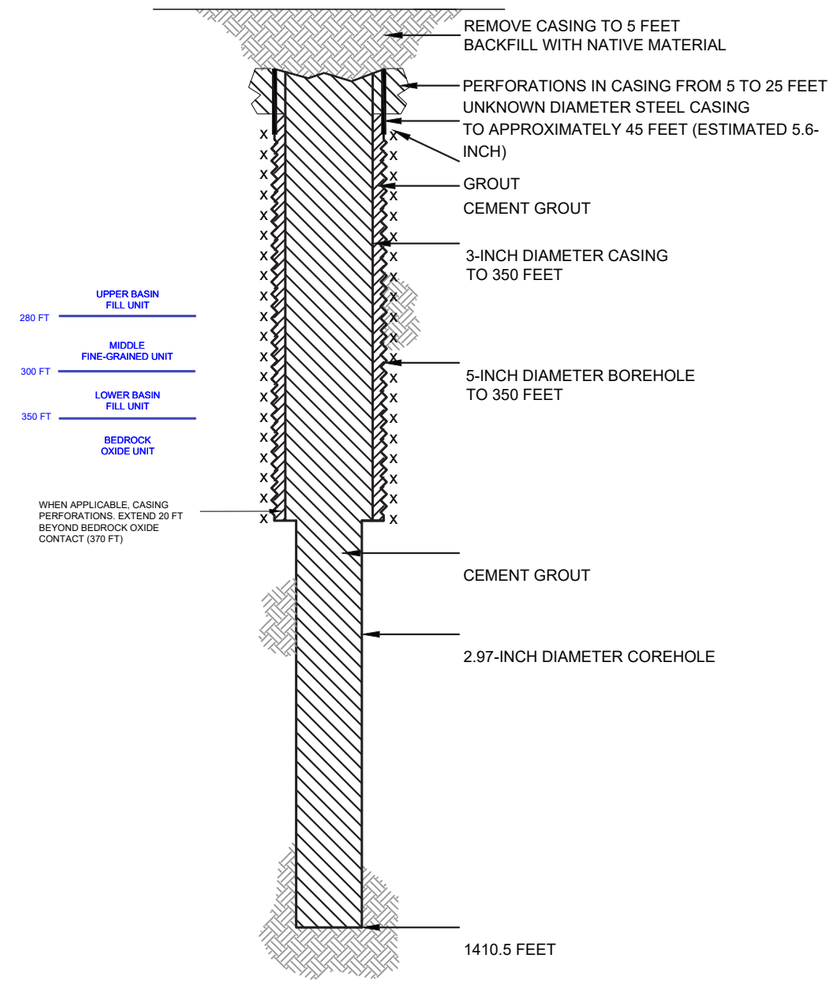
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 260



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 260



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 260 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		261S

State	County
Arizona	Pinal

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

Latitude 33.05032927

Longitude -111.4285261

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

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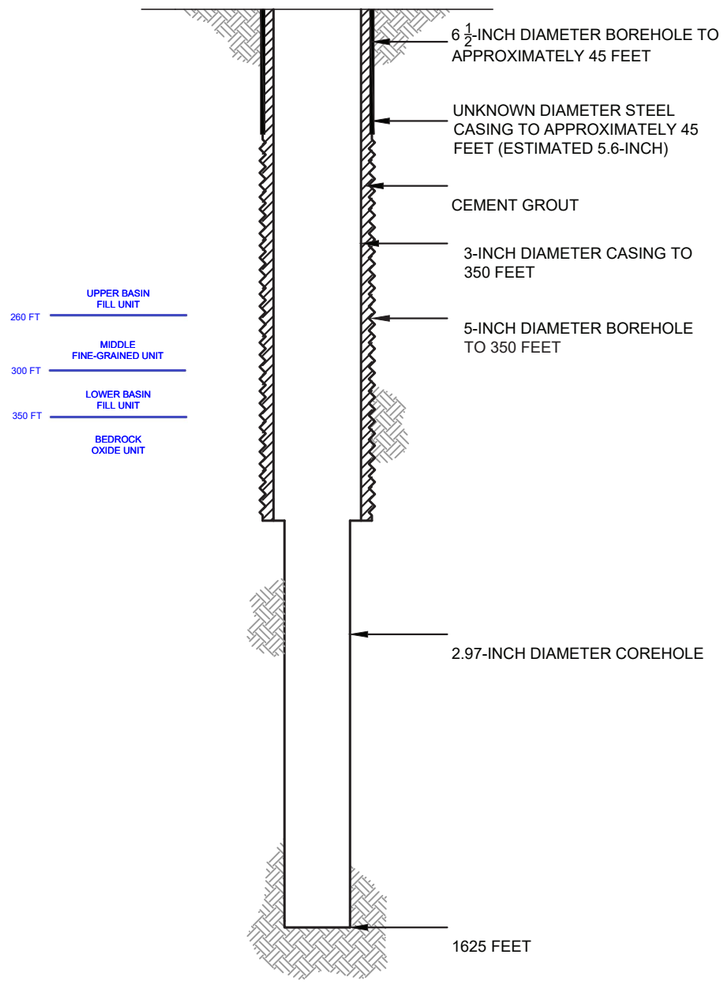
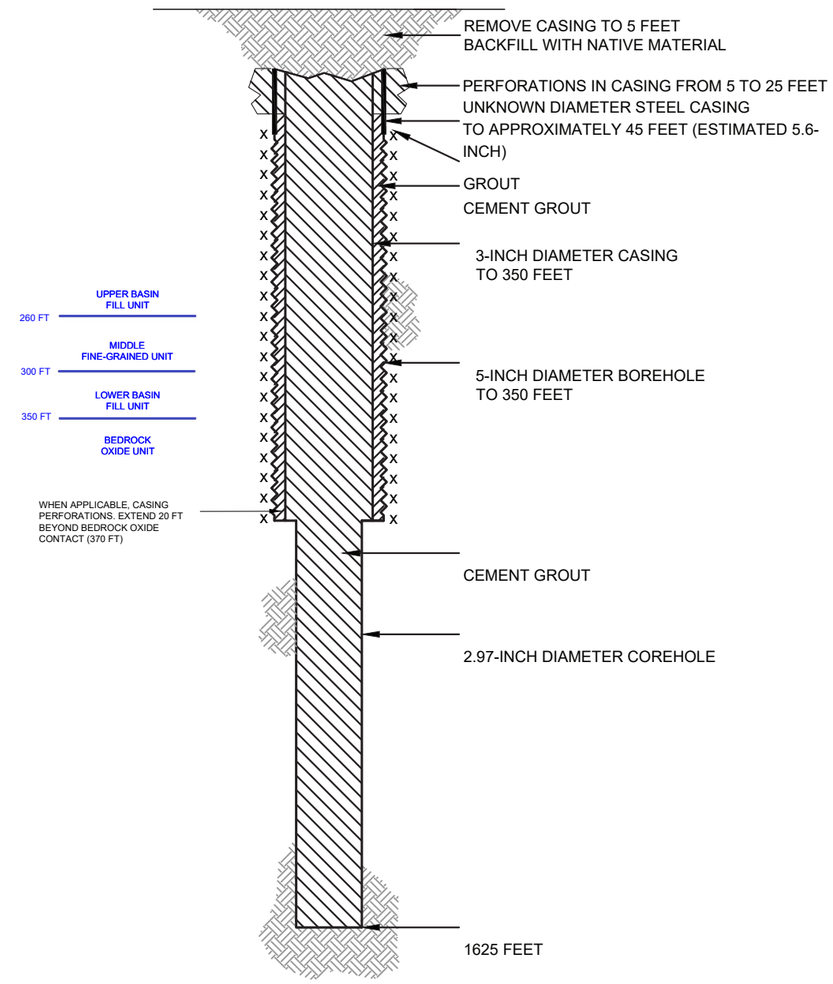
AS-BUILT COREHOLE 261S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 261S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 261S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
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FIGURE 1

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G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

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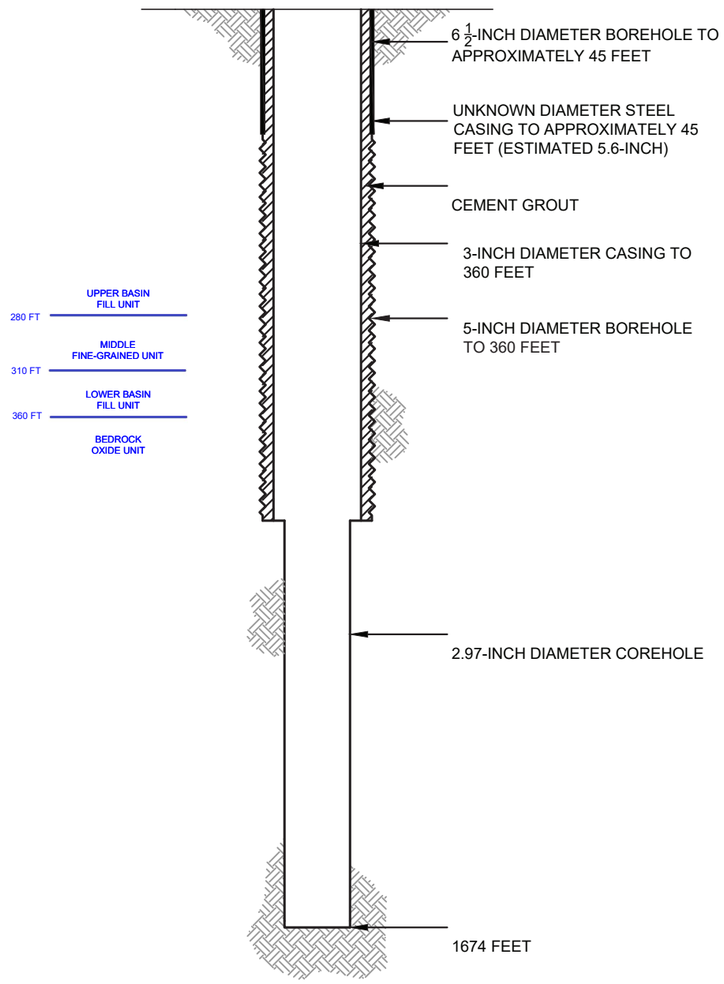
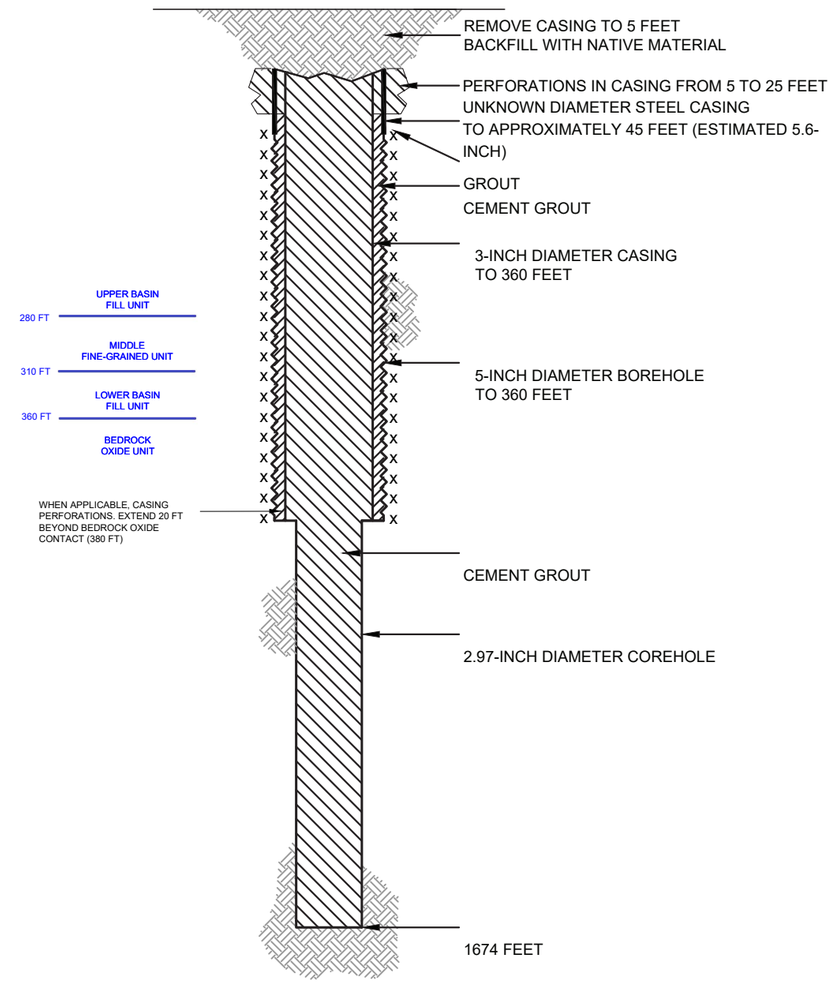
AS-BUILT COREHOLE 254S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 254S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 254S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		263MF

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.04914555

Longitude -111.4277118

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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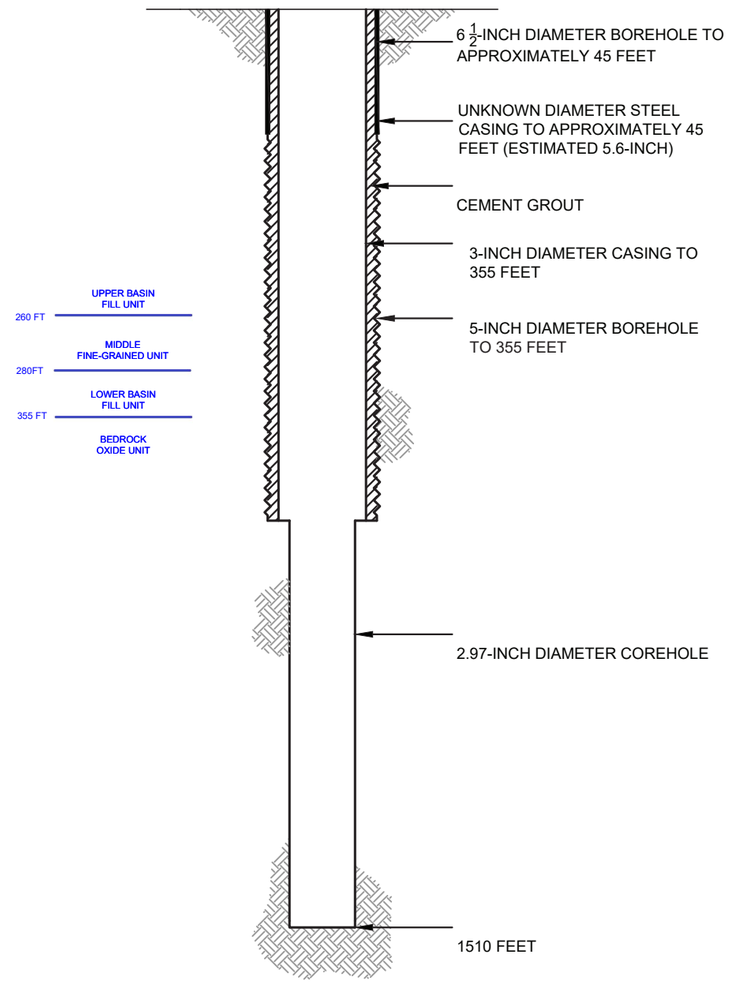
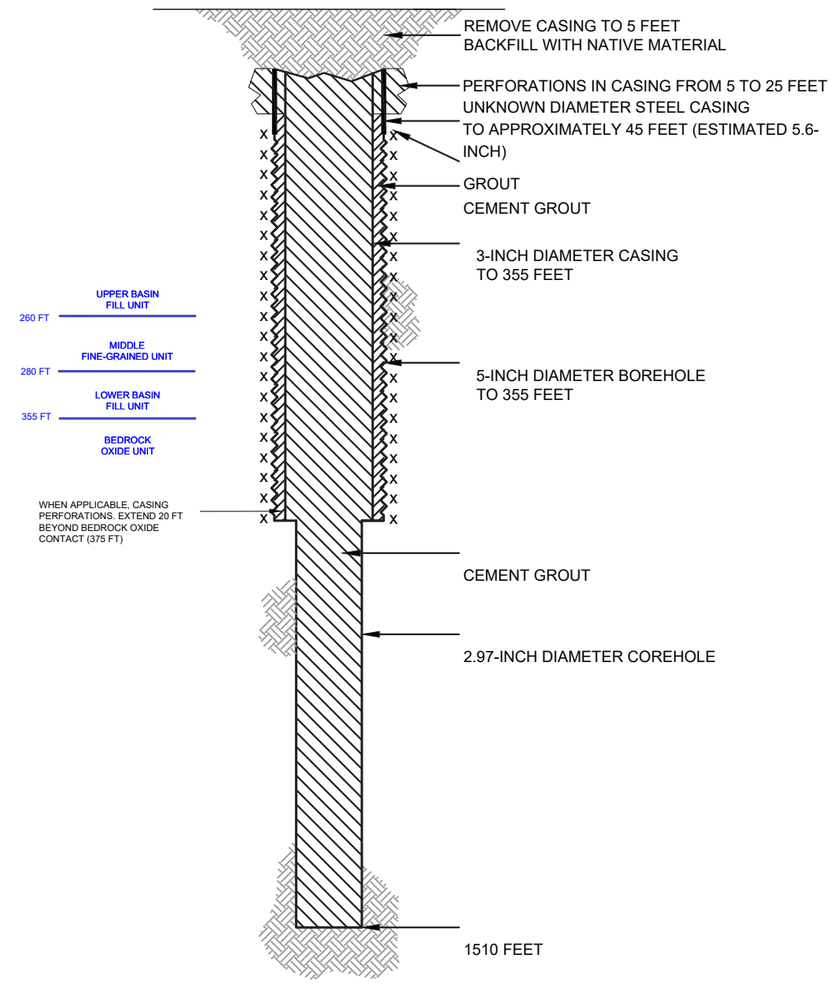
AS-BUILT COREHOLE 263MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 263MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 263MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		264MF

State	County
Arizona	Pinal

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

Latitude 33.04855332

Longitude -111.4273156

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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

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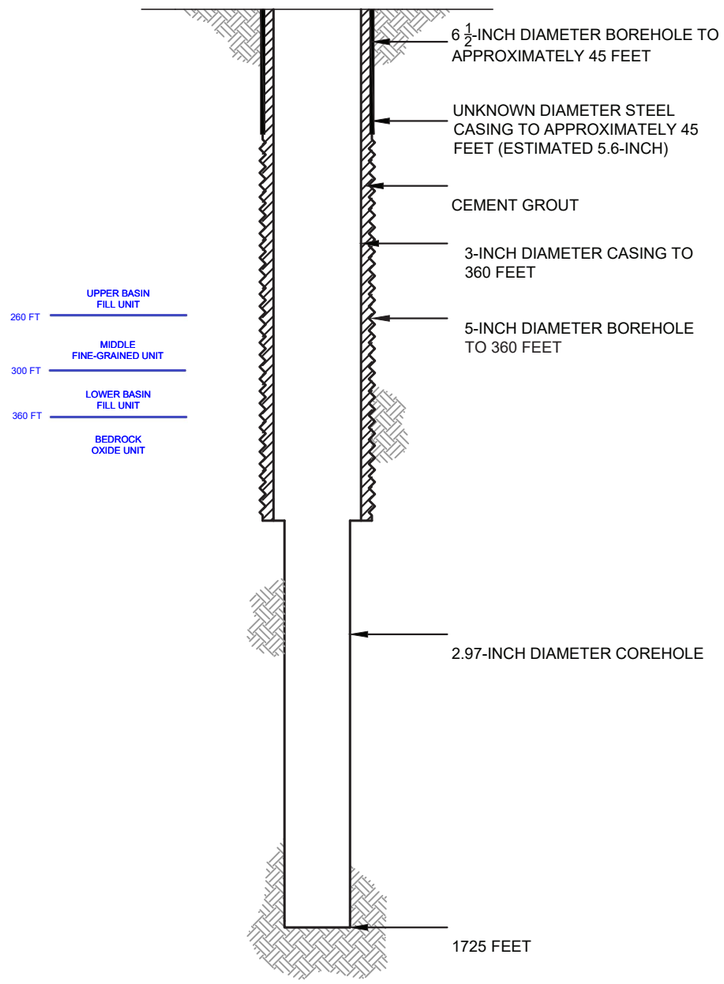
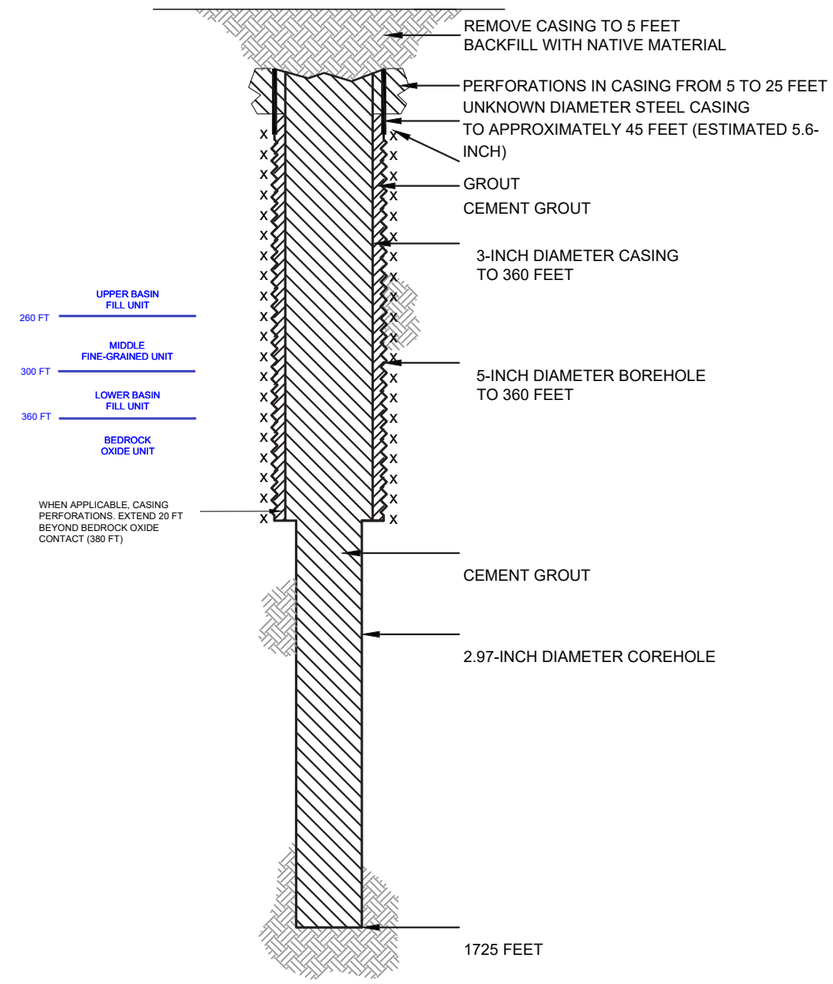
AS-BUILT COREHOLE 264MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 264MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 264MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		265MF

State	County
Arizona	Pinal

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

Latitude 33.04795165

Longitude -111.426897

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

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CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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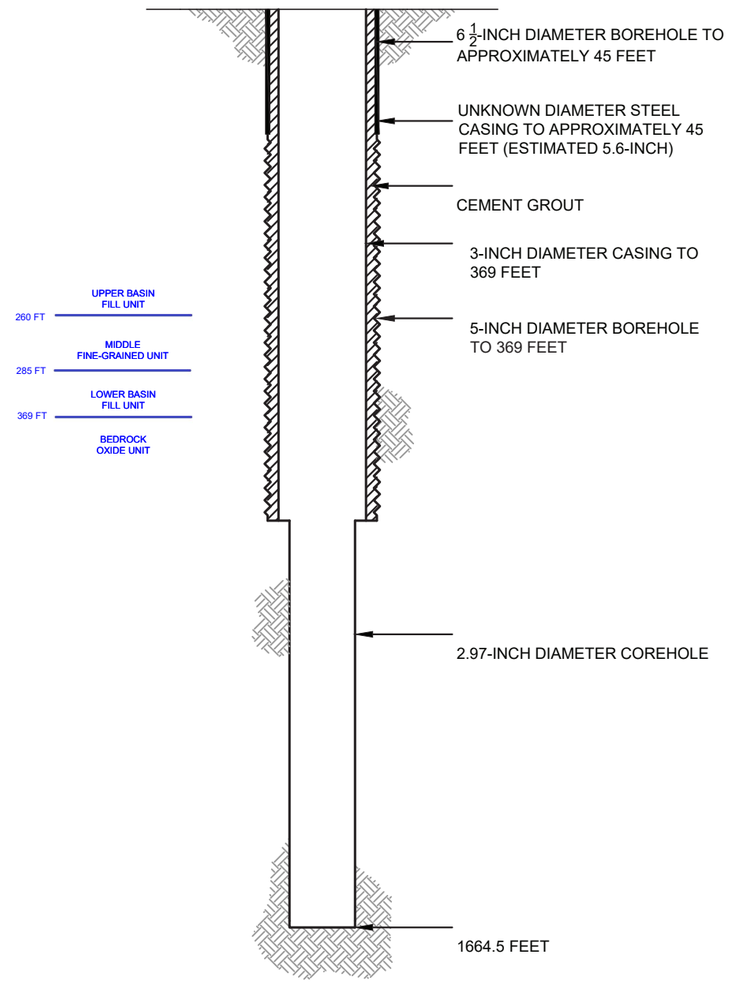
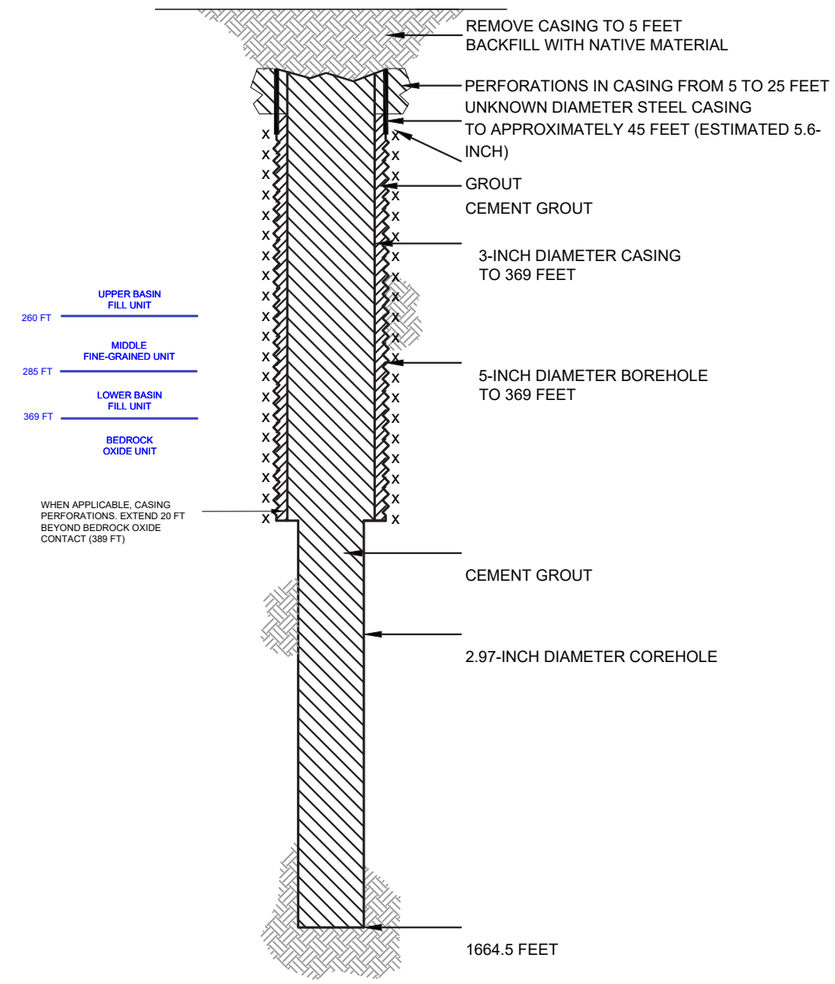
AS-BUILT COREHOLE 265MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 265MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 265MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		266S

State	County
Arizona	Pinal

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

Latitude 33.04974386

Longitude -111.4281164

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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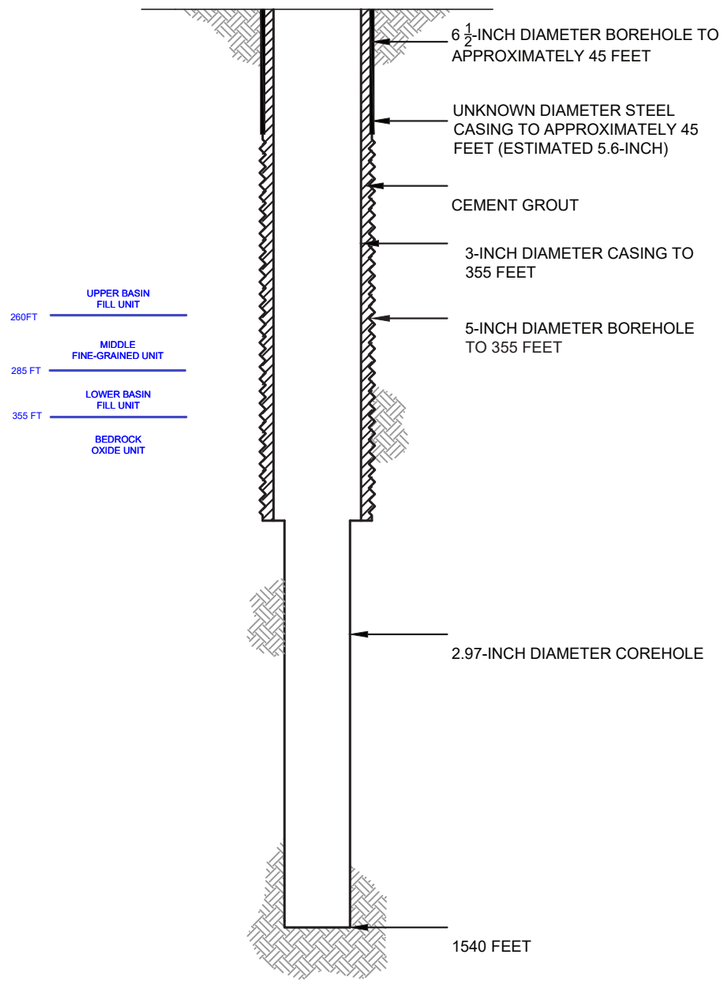
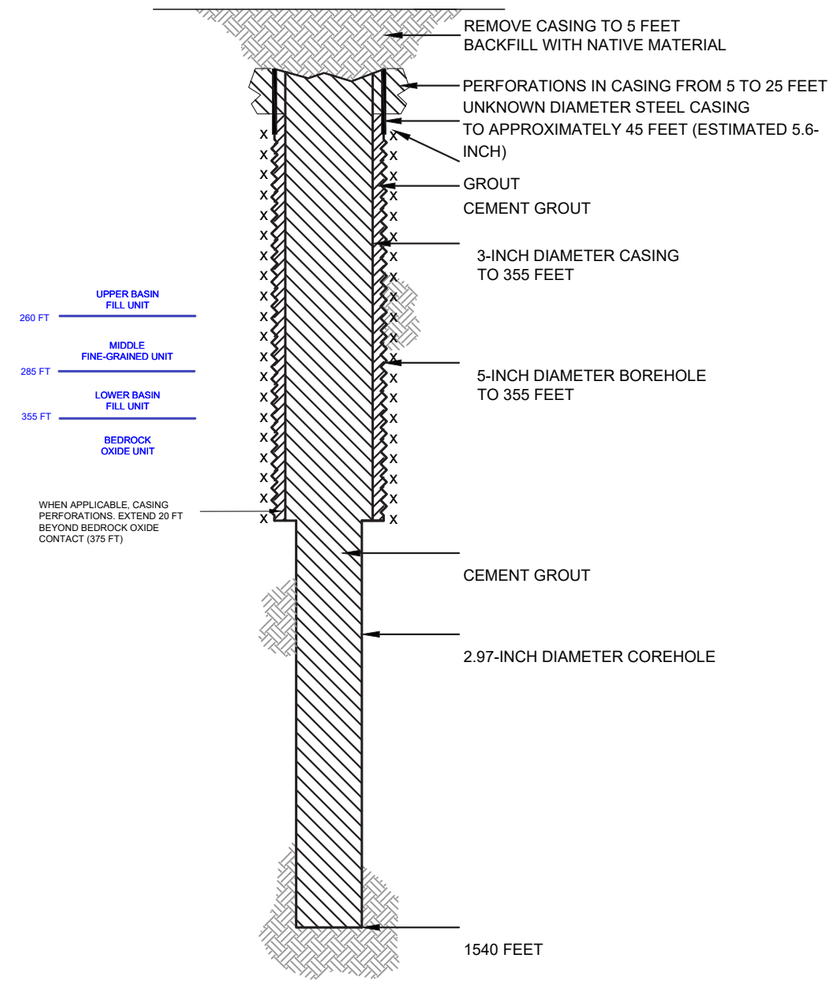
AS-BUILT COREHOLE 266S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 266S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 266S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		267S

State	County
Arizona	Pinal

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

Latitude 33.04913371

Longitude -111.4252596

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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Dan Johnson, VP - General Manager		10/3/2019

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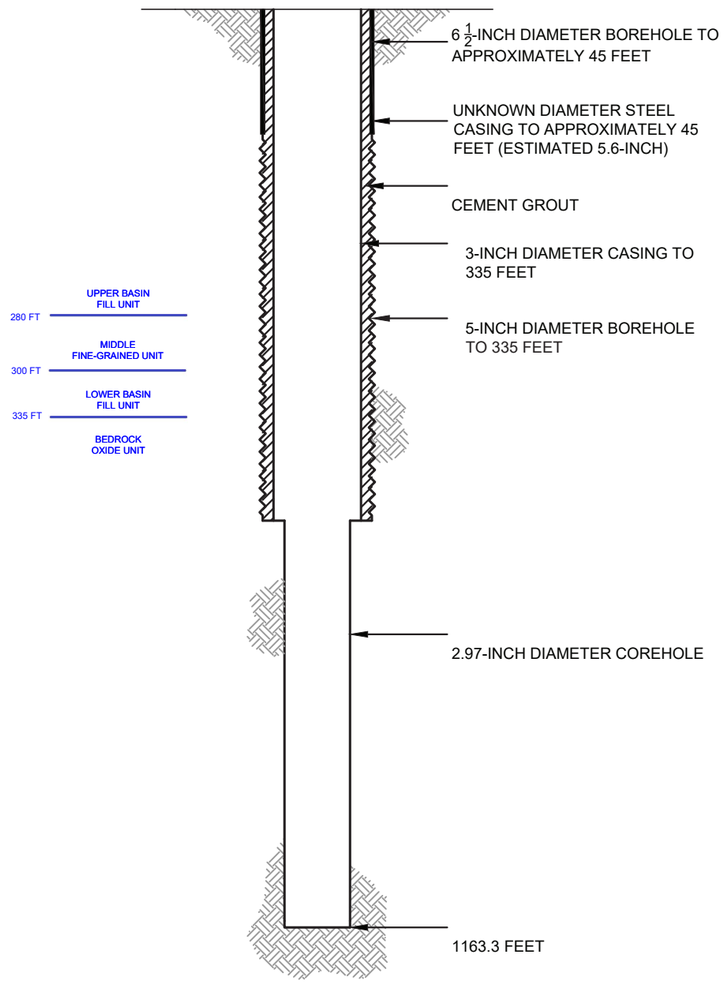
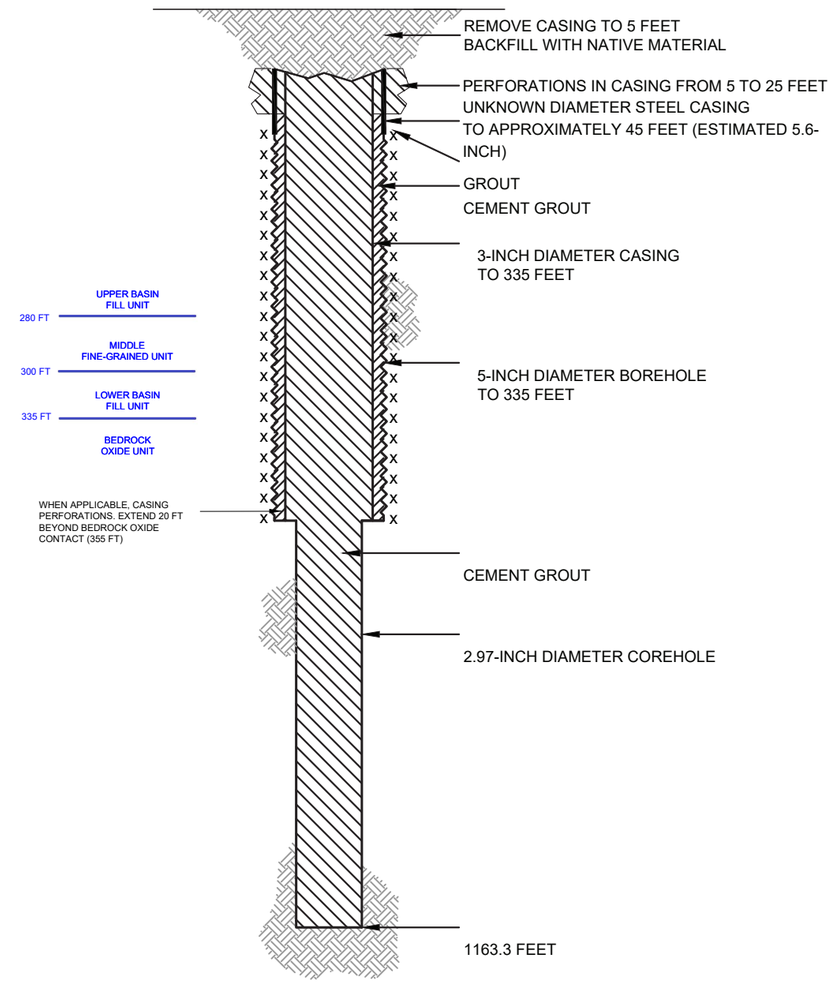
AS-BUILT COREHOLE 267S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 267S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 267S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		268MF

State	County
Arizona	Pinal

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

Latitude 33.0491427

Longitude -111.4260768

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Dan Johnson, VP - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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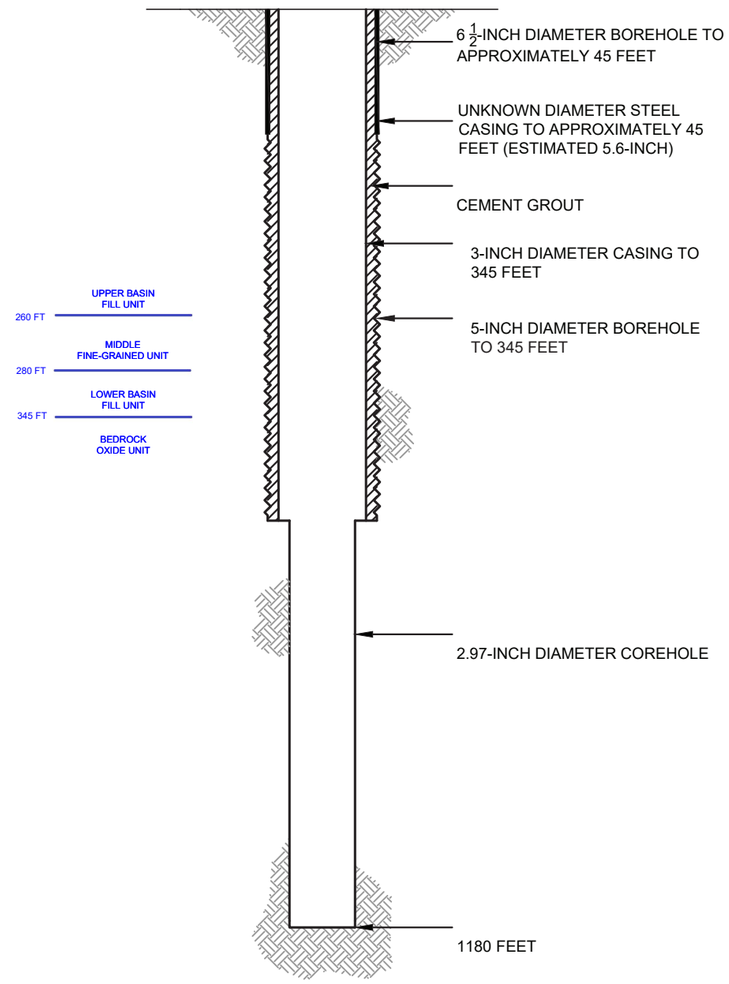
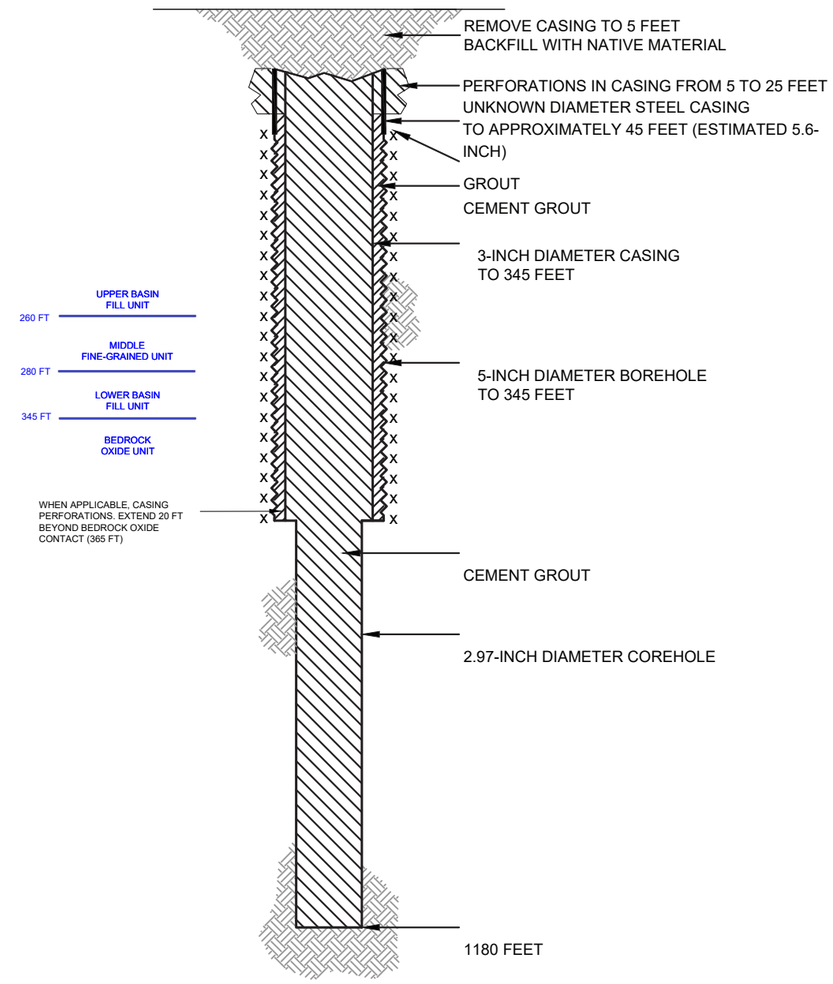
AS-BUILT COREHOLE 268MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 268MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 268MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		269S

State	County
Arizona	Pinal

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

Latitude 33.04973344

Longitude -111.4232342

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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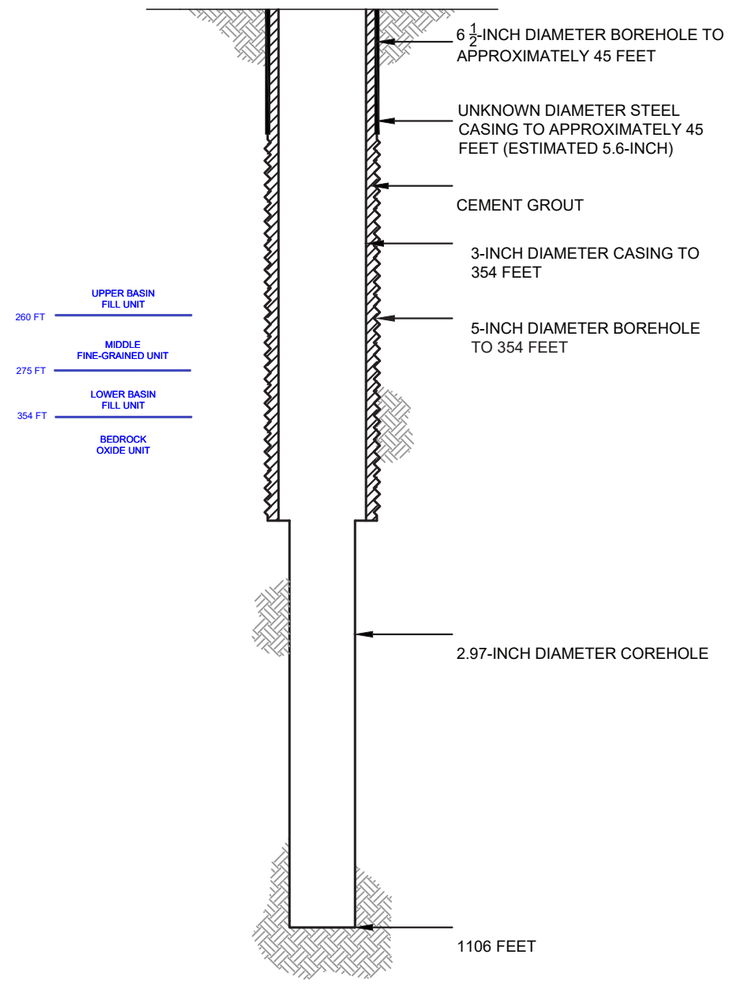
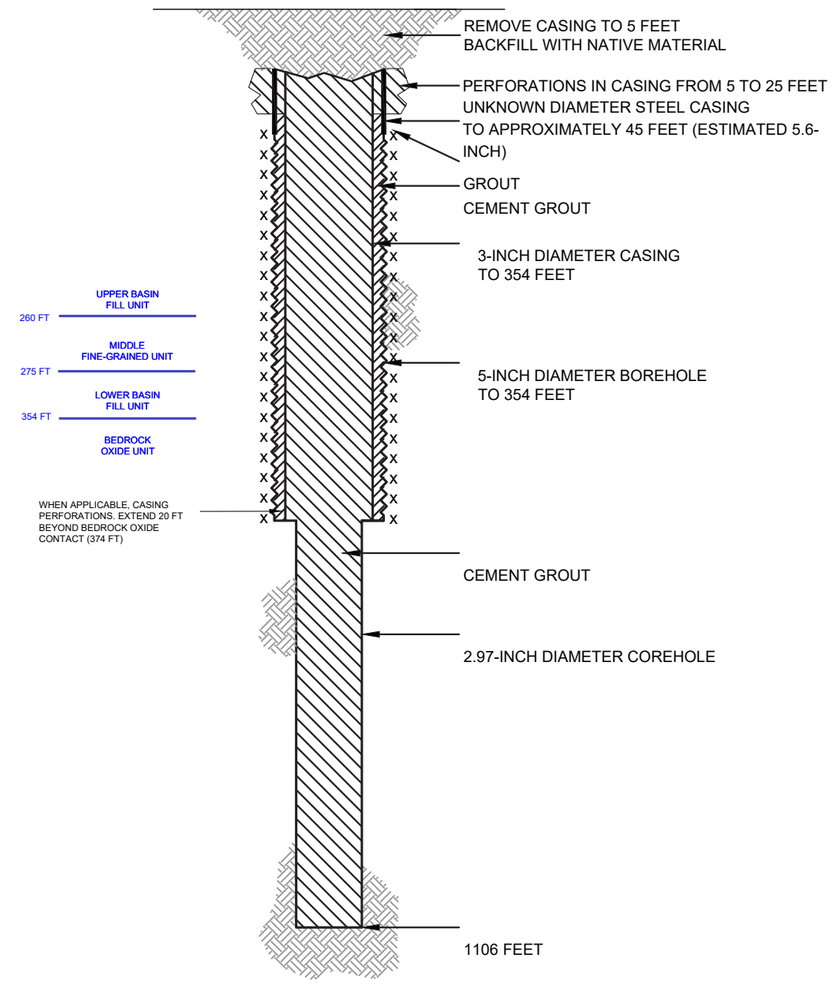
AS-BUILT COREHOLE 269S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 269S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 269S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		279S

State	County
Arizona	Pinal

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

Latitude 33.05151976

Longitude -111.4277006

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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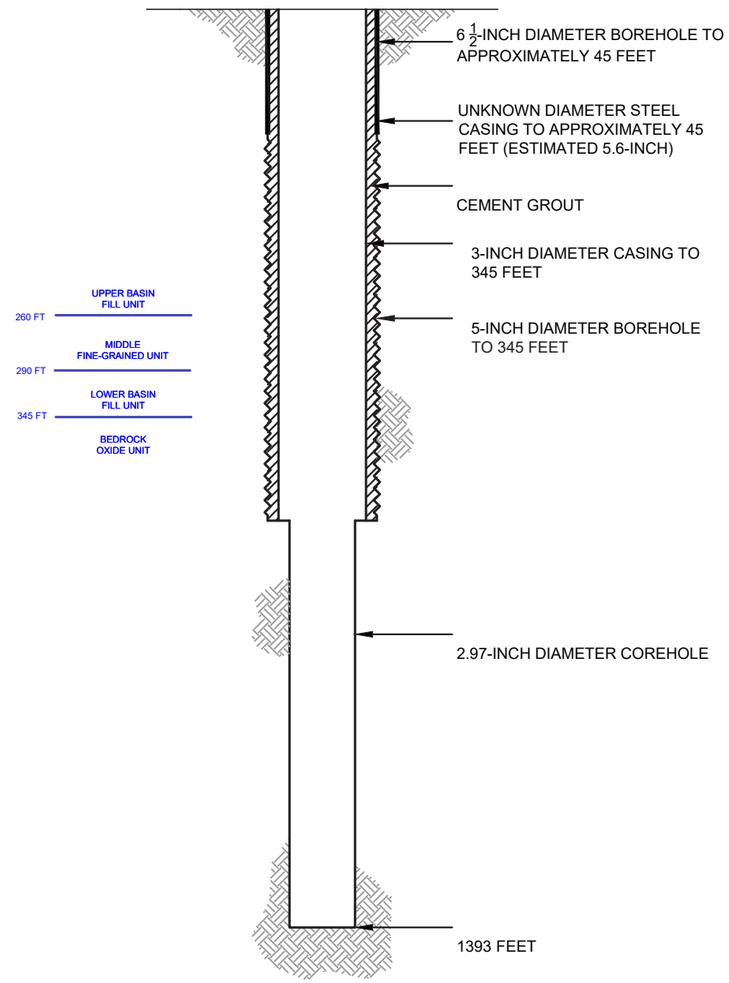
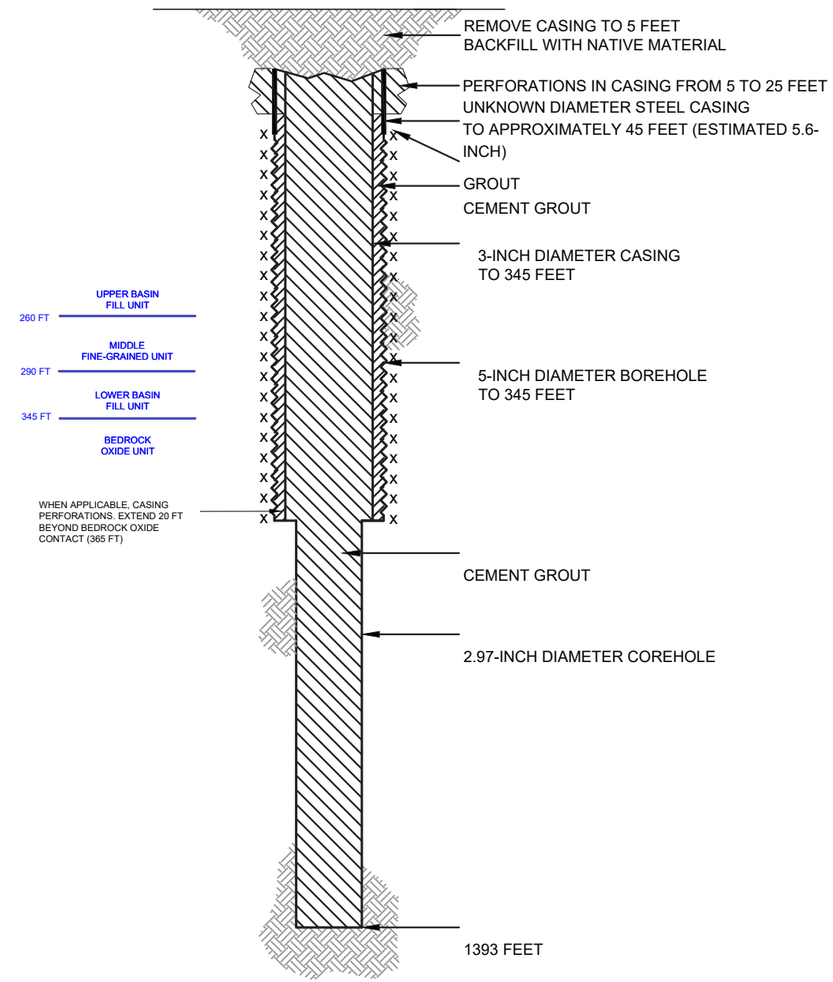
AS-BUILT COREHOLE 279S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 279S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 279S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

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R9UIC-AZ3-FY11-1		280S

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A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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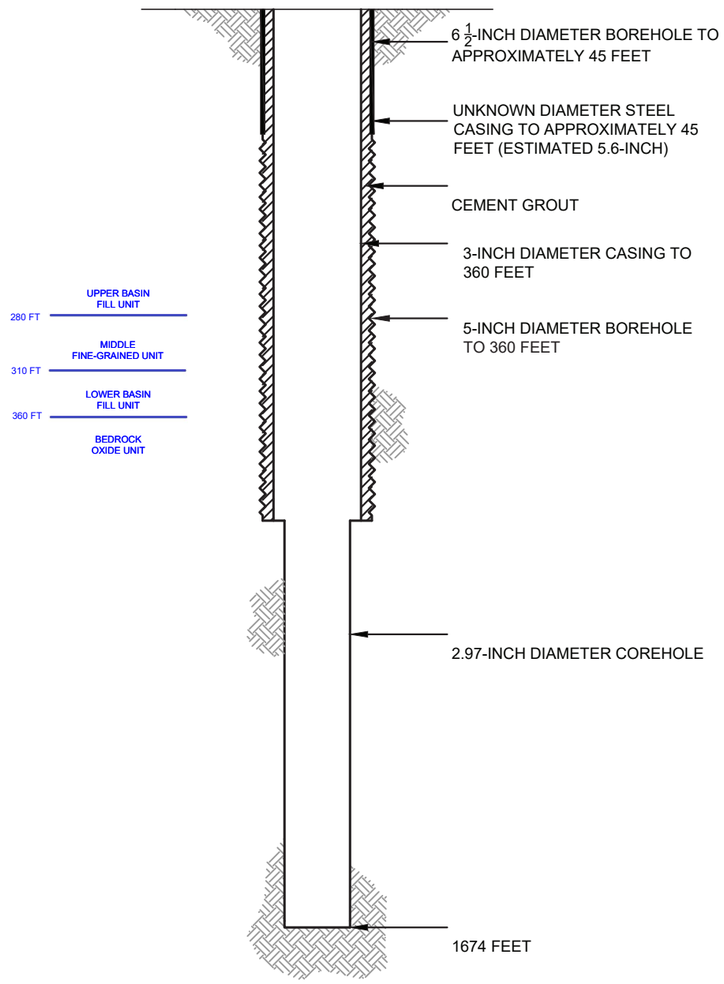
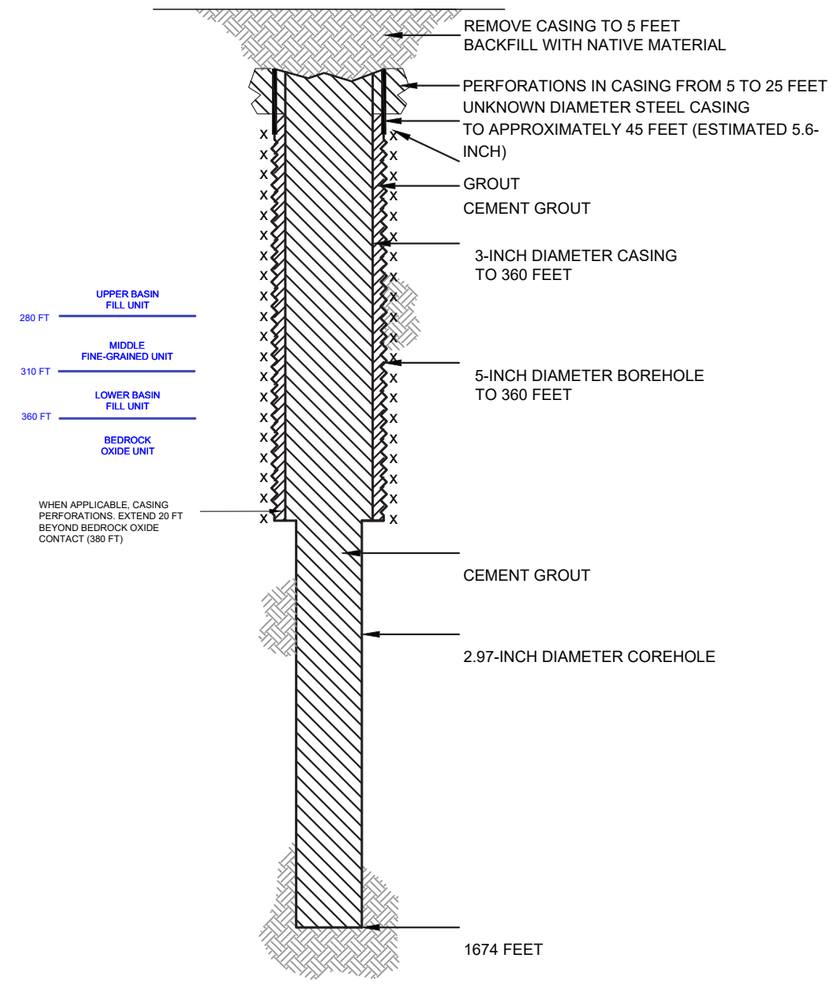
AS-BUILT COREHOLE 254S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 254S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 254S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		282S

State	County
Arizona	Pinal

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

Latitude 33.05012402

Longitude -111.4268631

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP - General Manager		10/3/2019

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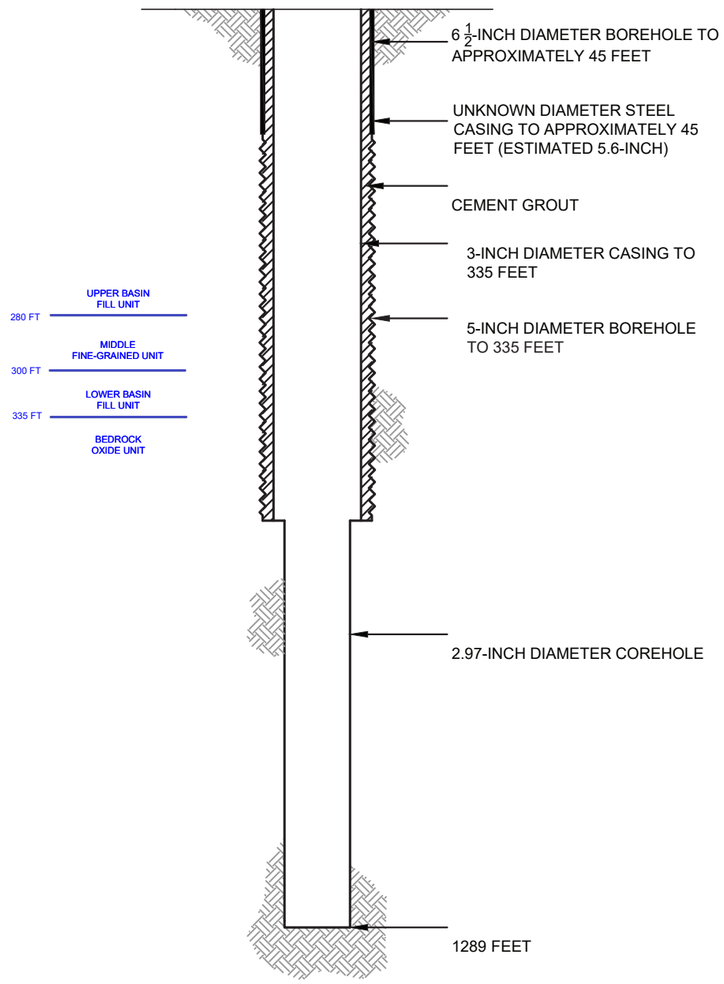
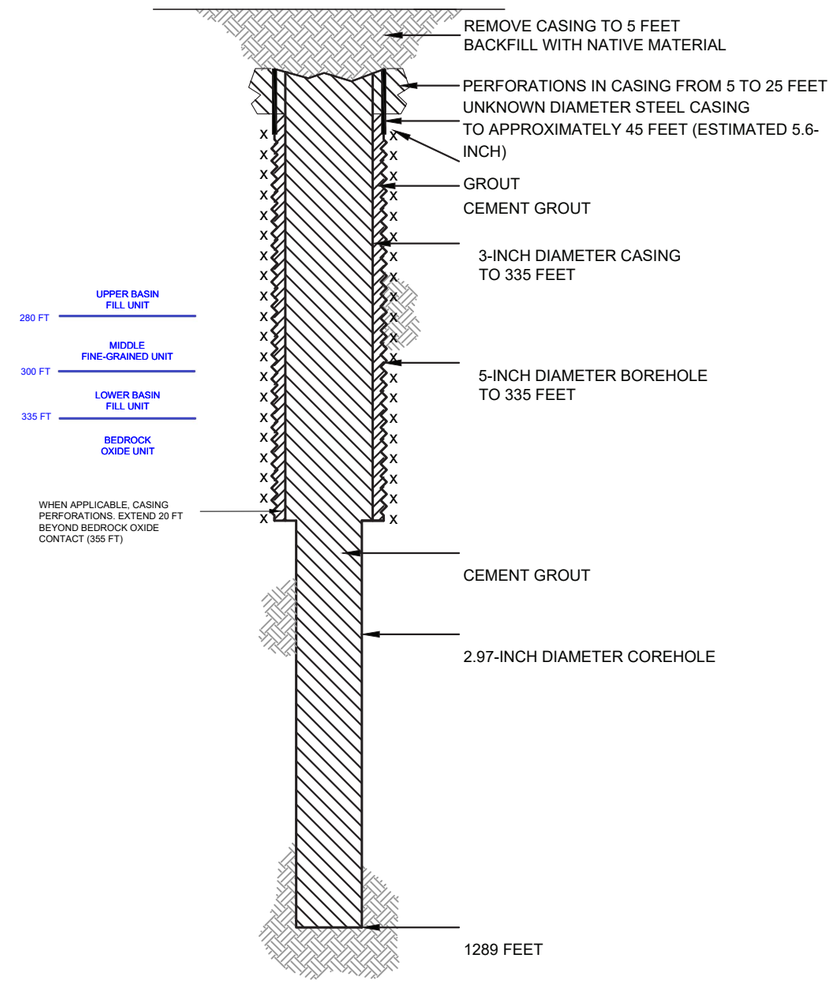
AS-BUILT COREHOLE 282S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 282S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 282S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		316

State	County
Arizona	Pinal

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

Latitude 33.05333897

Surface Location

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

Longitude -111.4323965

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
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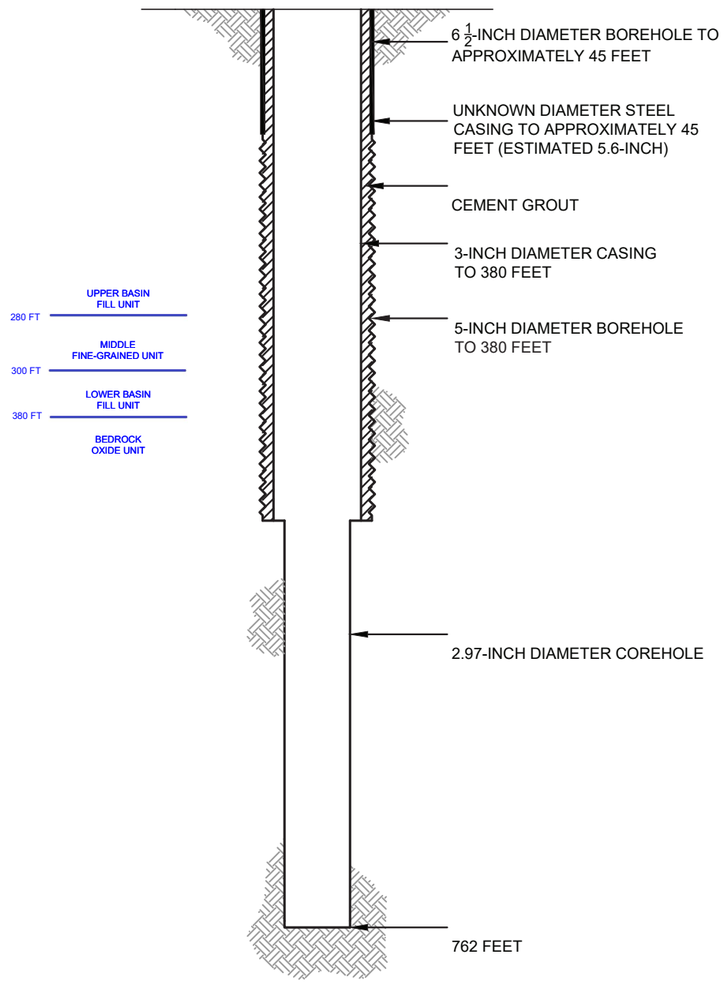
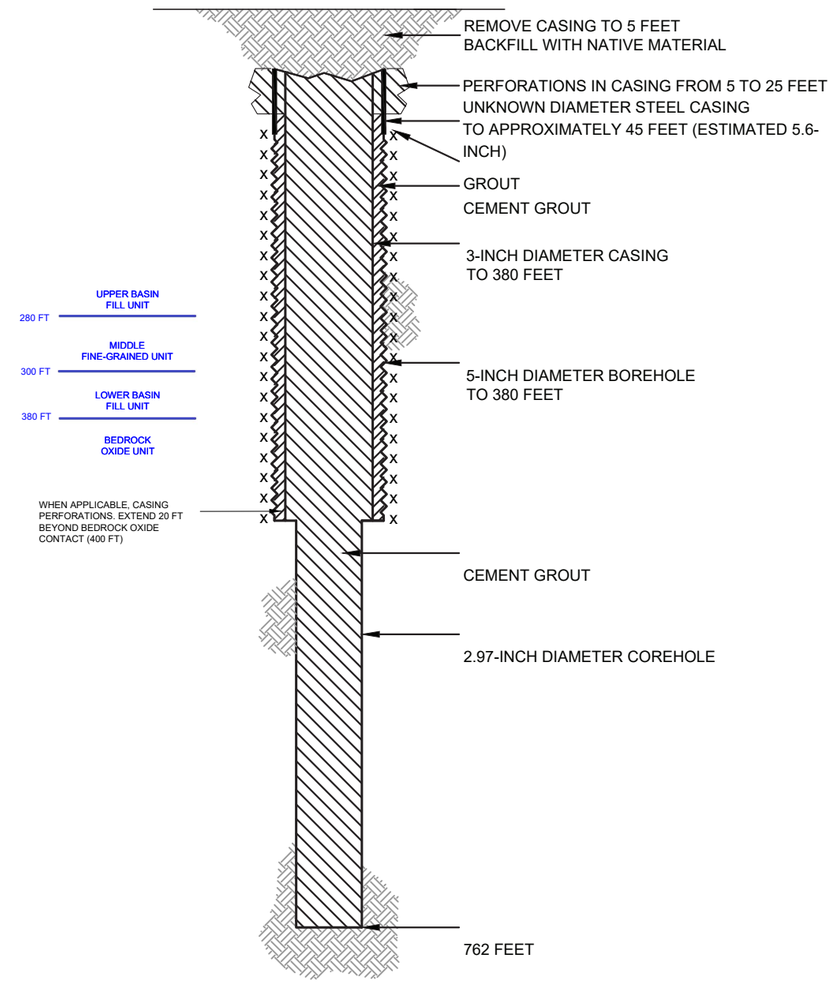
AS-BUILT COREHOLE 316



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 316



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 316 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		326S

State	County
Arizona	Pinal

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

Latitude 33.05091849

Longitude -111.4240311

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

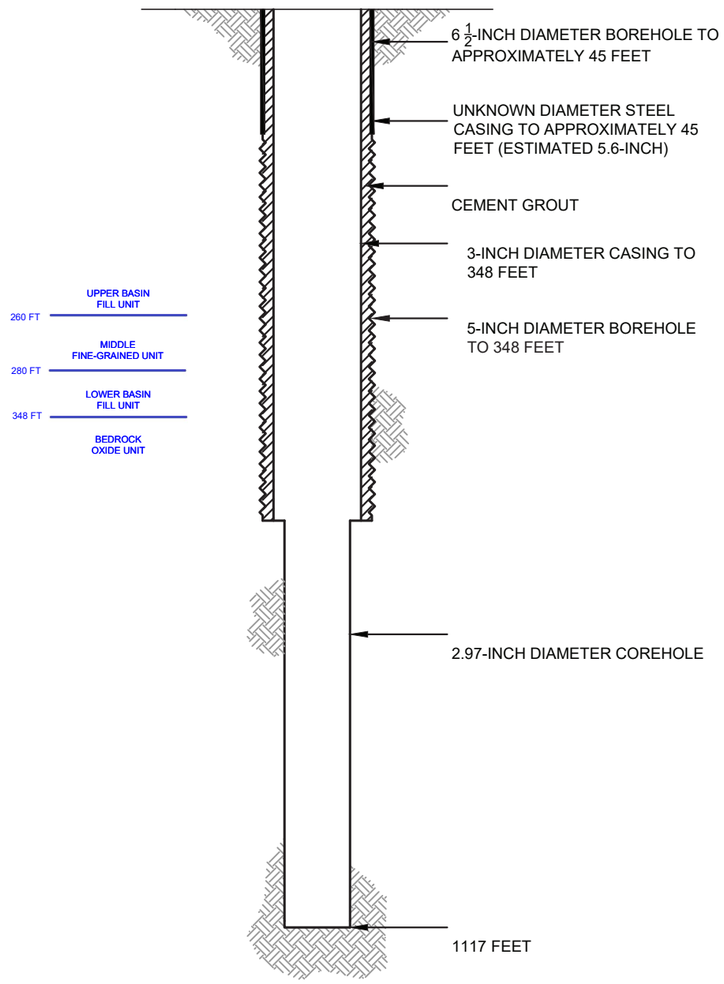
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

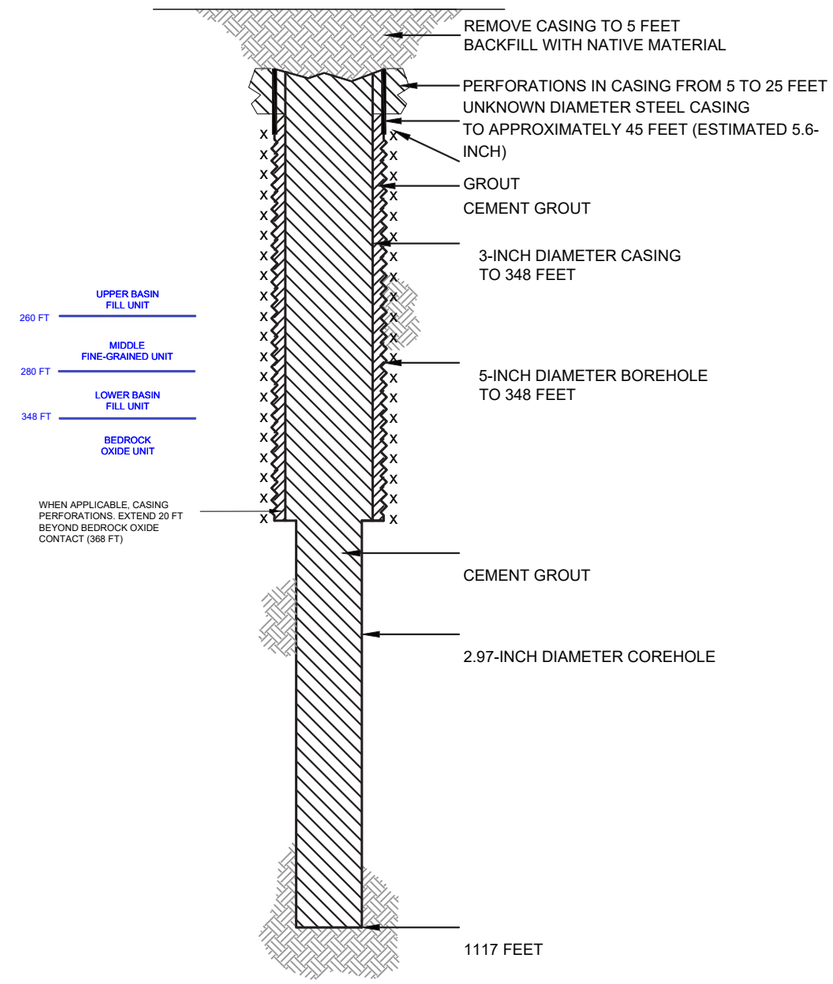
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 326S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 326S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 326S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		327S

State	County
Arizona	Pinal

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

Latitude 33.05151516

Longitude -111.4244357

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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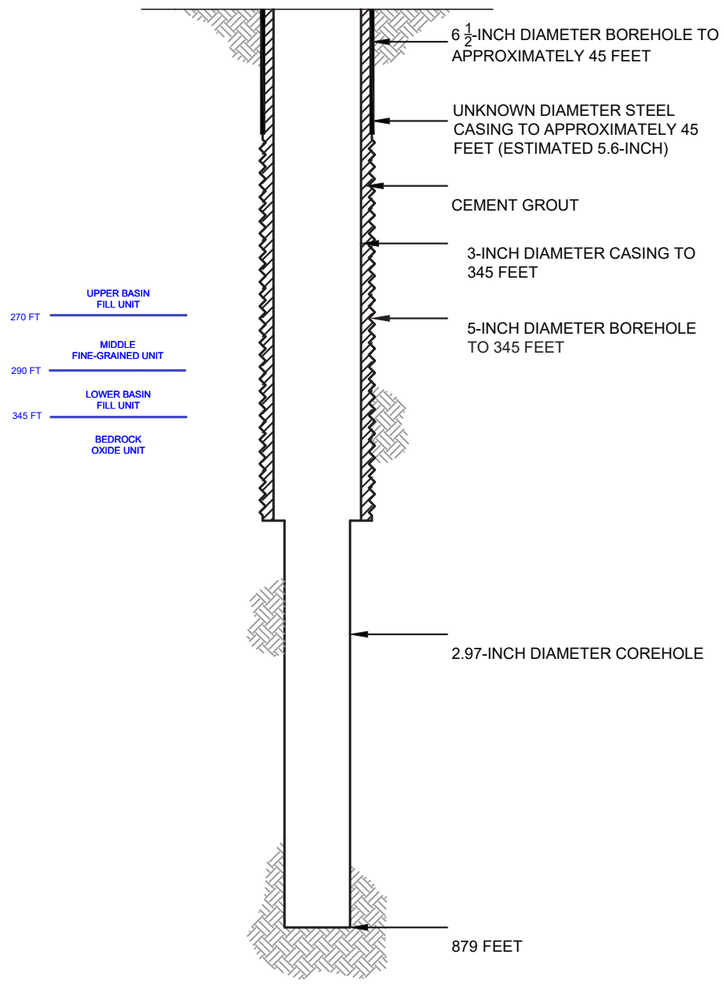
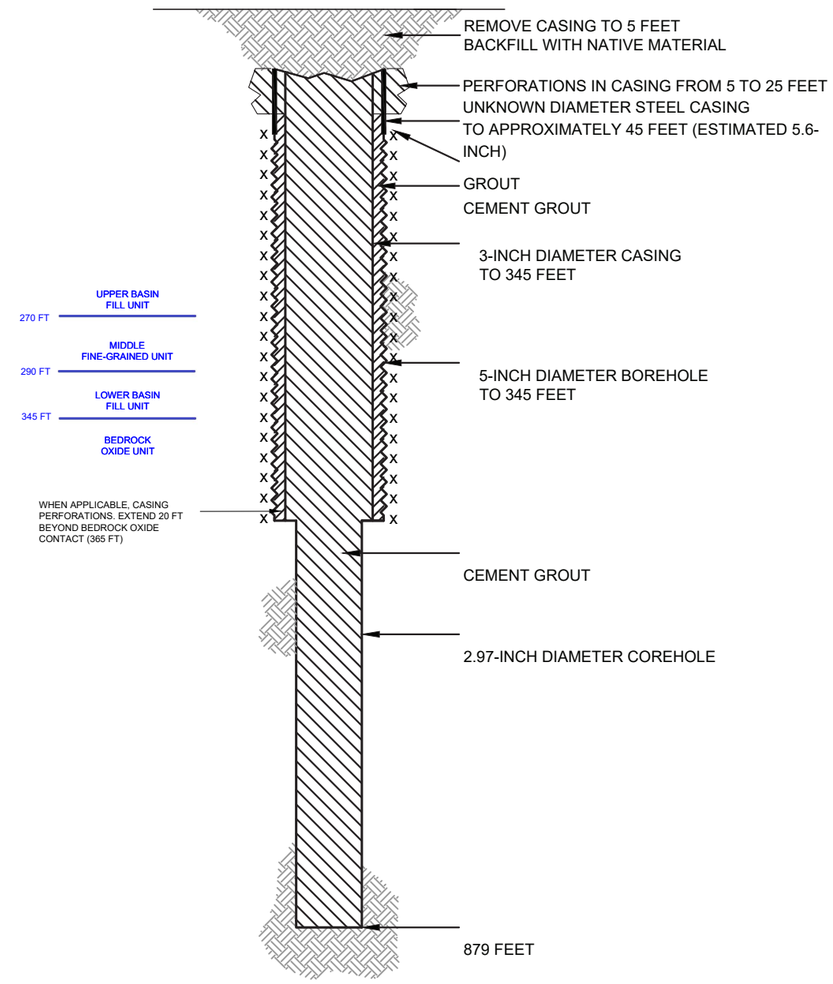
AS-BUILT COREHOLE 327S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 327S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 327S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		328S

State	County
Arizona	Pinal

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_____ **ft. from (N/S)** _____ **Line of quarter section**

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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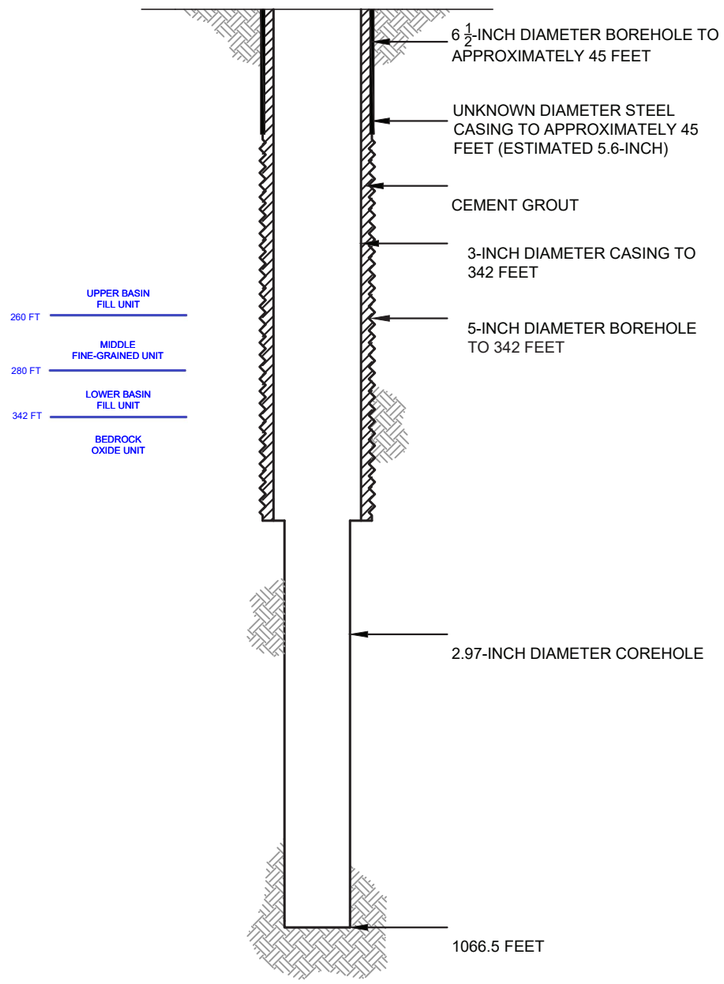
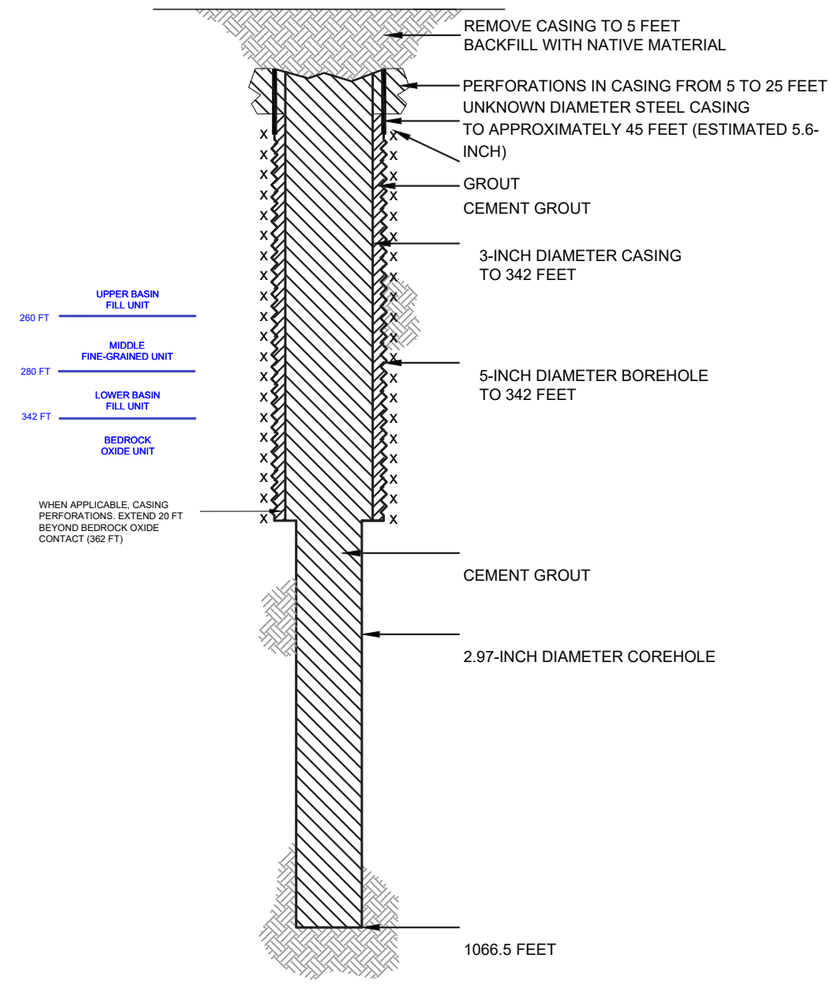
AS-BUILT COREHOLE 328S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 328S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 328S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		329S

State	County
Arizona	Pinal

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

Latitude 33.05092492

Longitude -111.4256629

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

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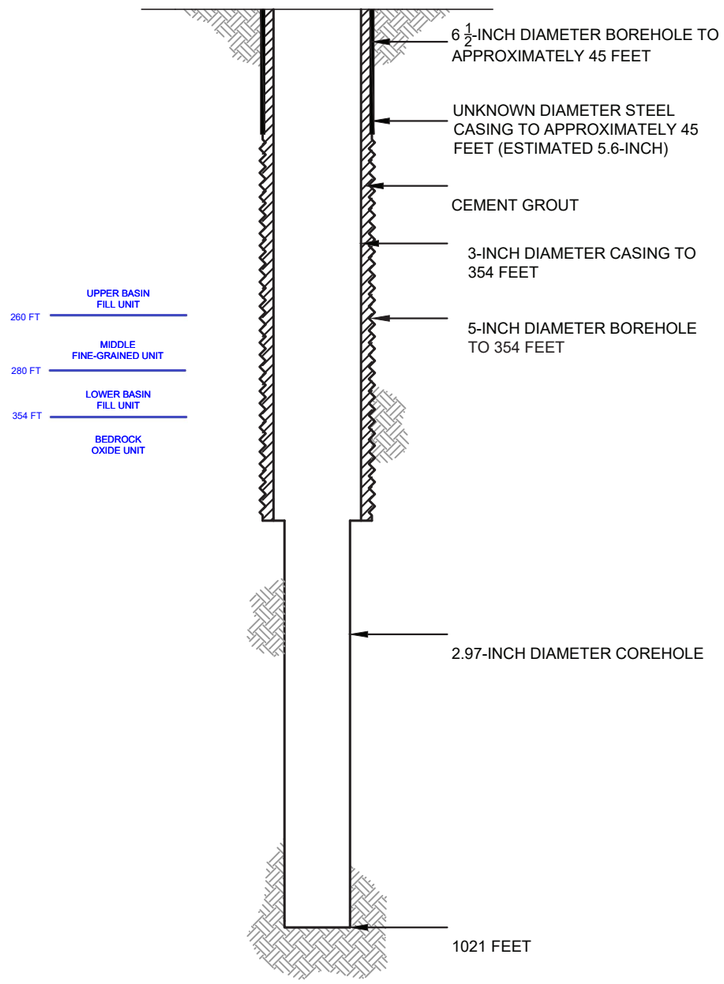
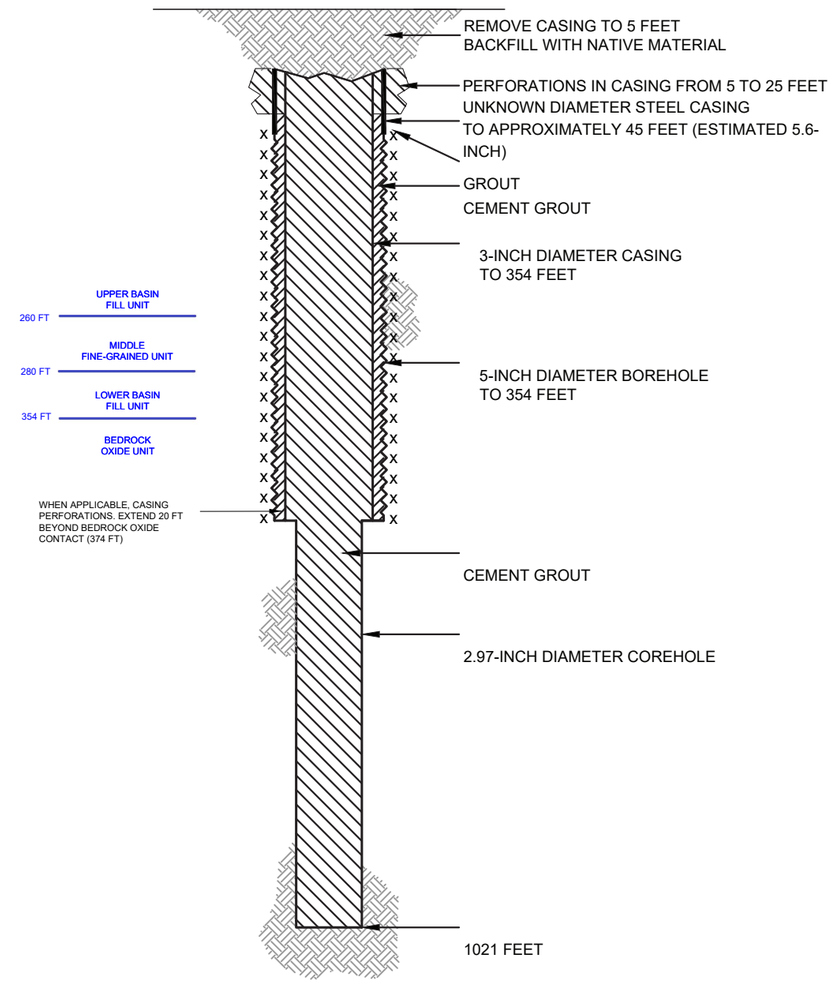


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 329S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 329S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		330S

State	County
Arizona	Pinal

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

Latitude 33.05036633

Longitude -111.4252264

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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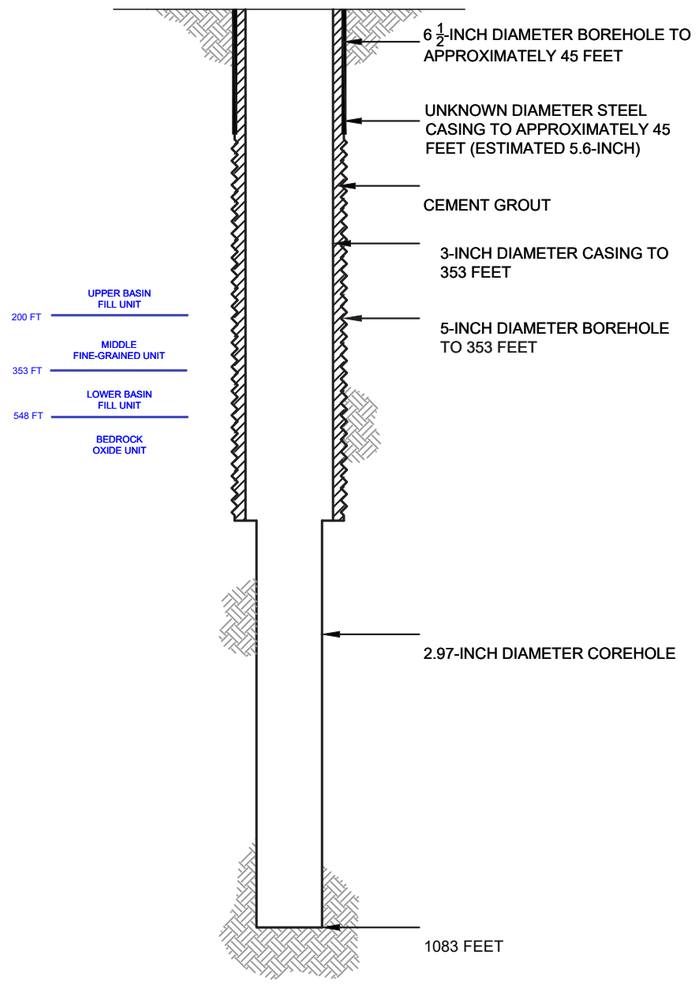

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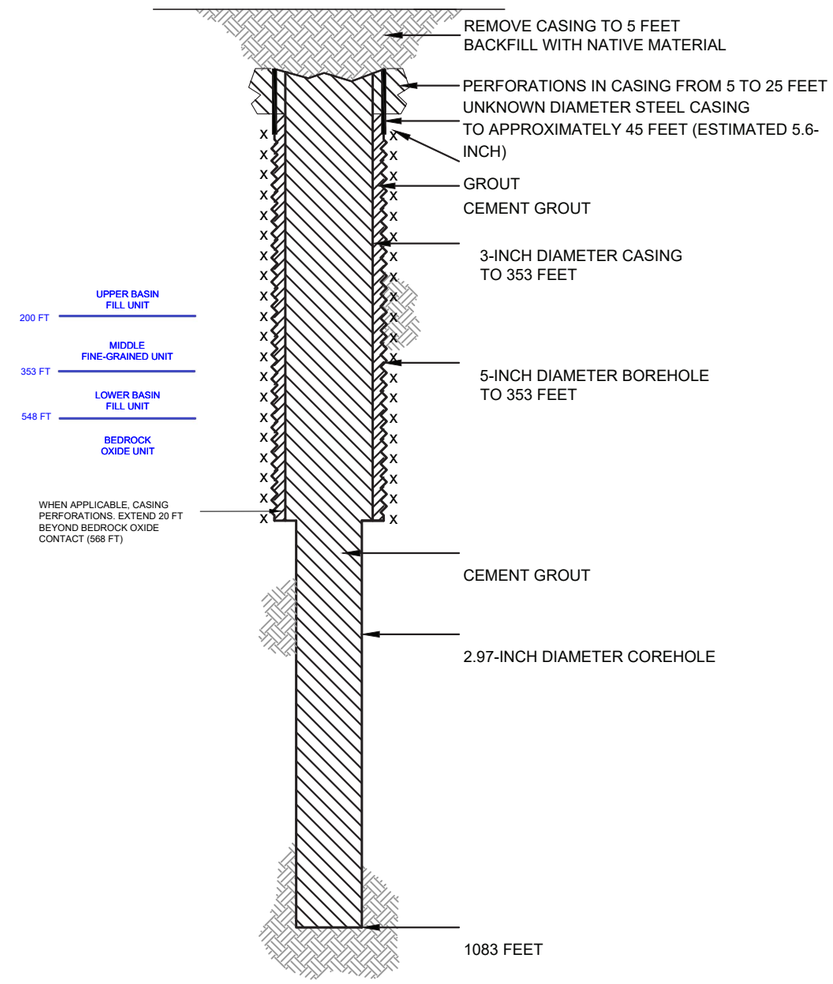

HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 330S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		331S

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

Latitude 33.05031859

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Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

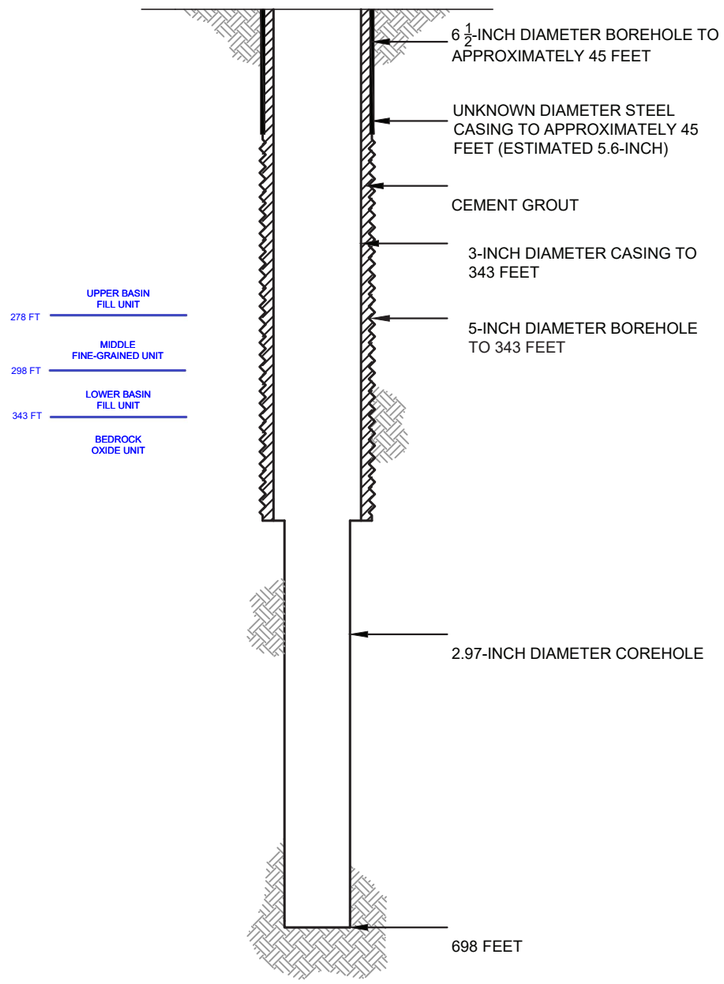
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

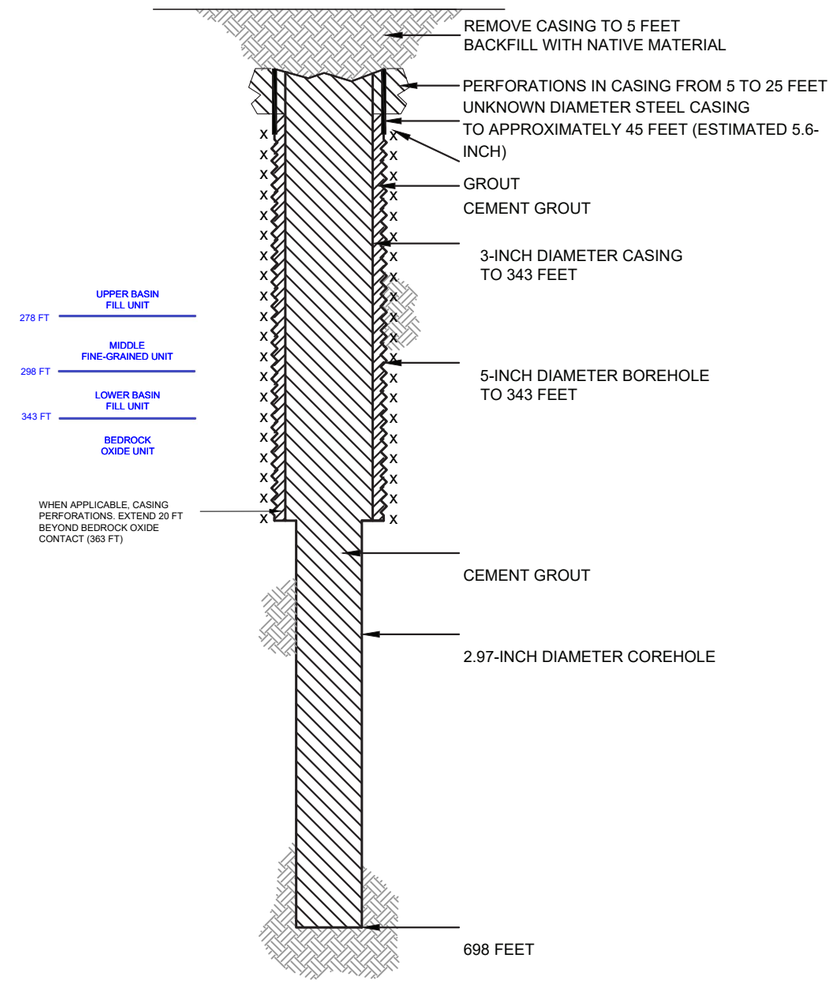
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 331S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 331S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 331S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		333S

State	County
Arizona	Pinal

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

Latitude 33.05032504

Longitude -111.4244423

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

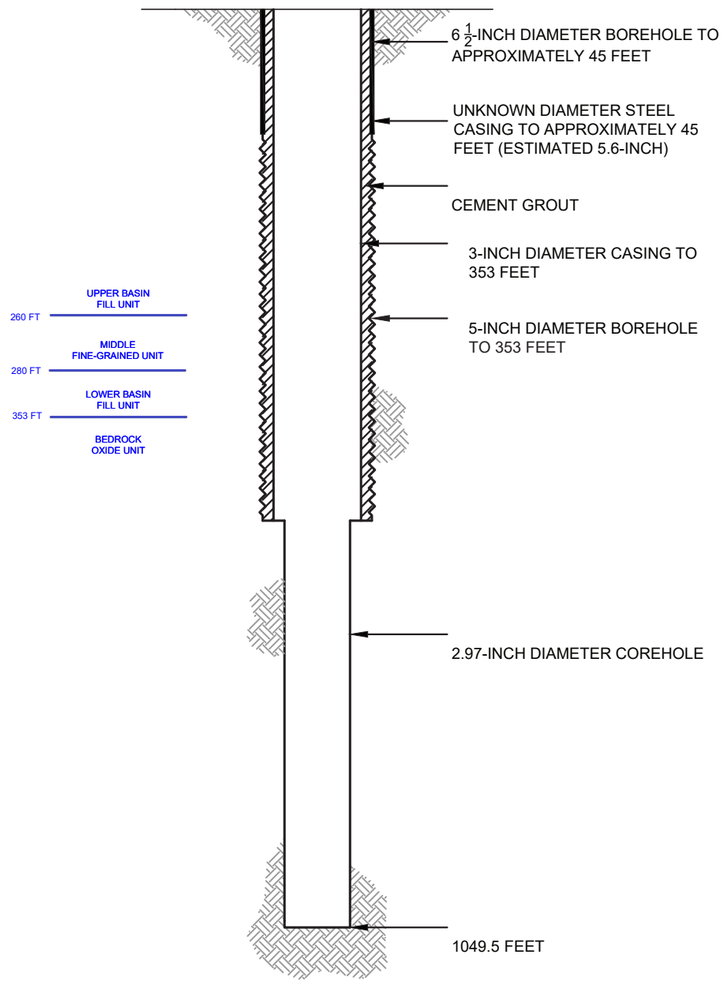
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

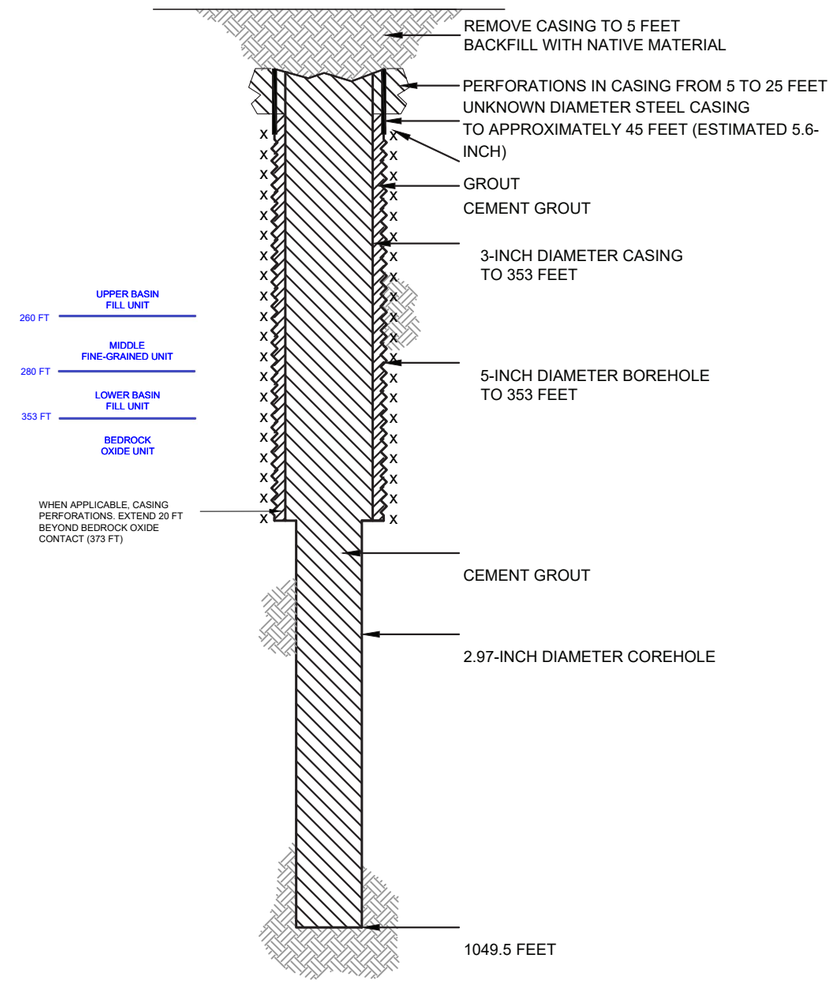
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 333S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 333S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 333S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		334S

State	County
Arizona	Pinal

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

Latitude 33.05032182

Longitude -111.4236265

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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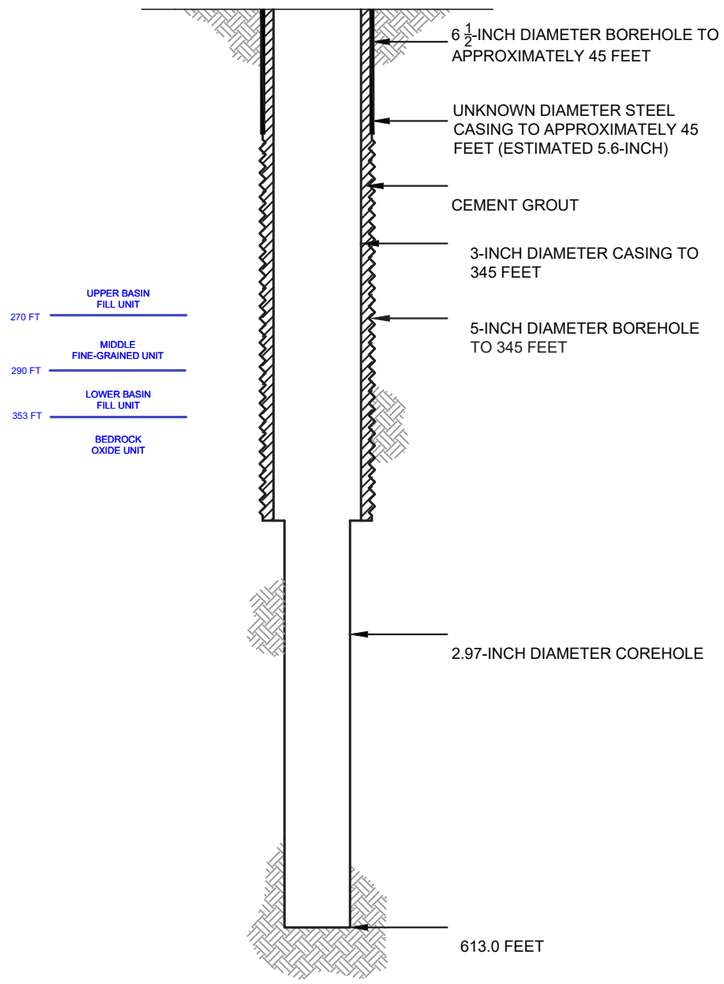
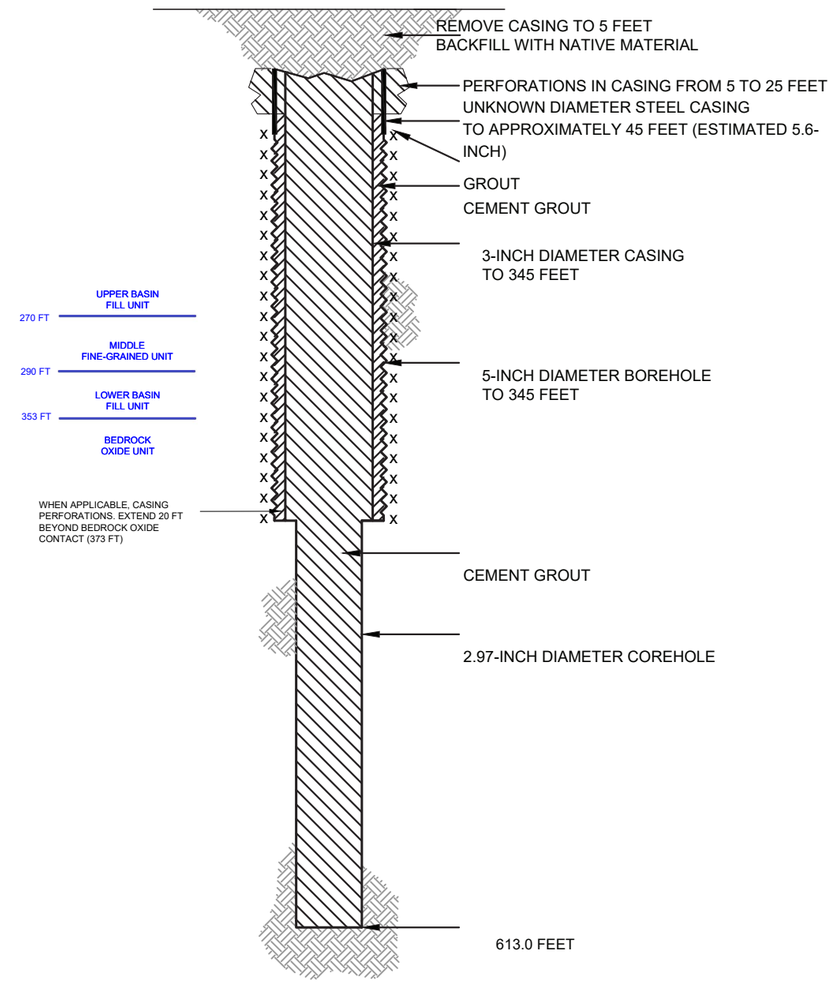
AS-BUILT COREHOLE 344S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 344S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 344S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		335S

State	County
Arizona	Pinal

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

Latitude 33.05210539

Longitude -111.4232086

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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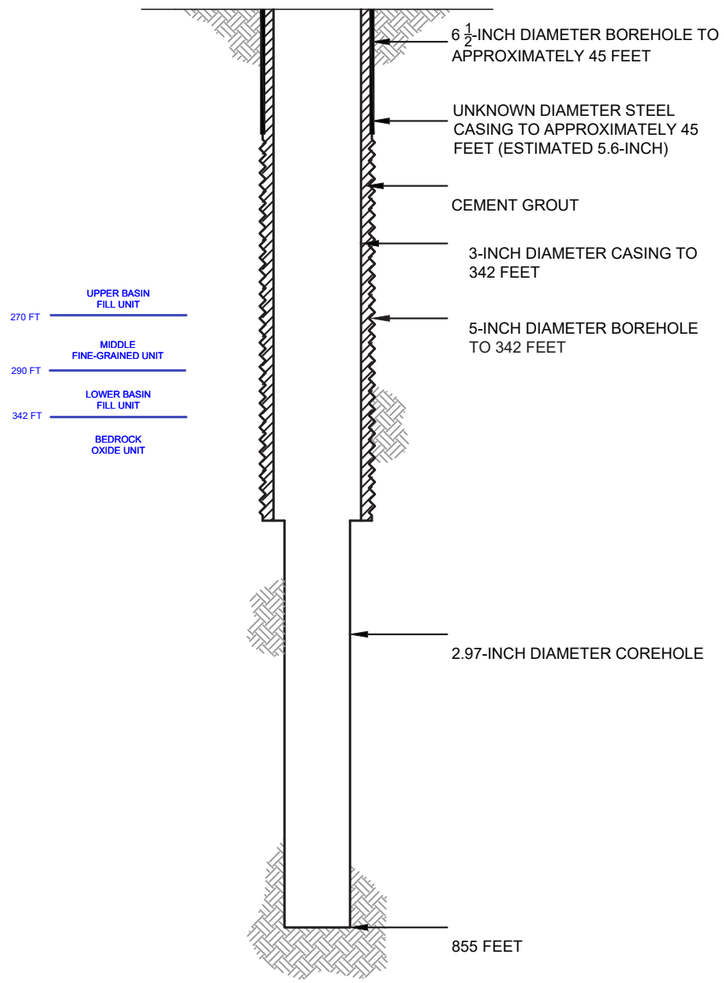
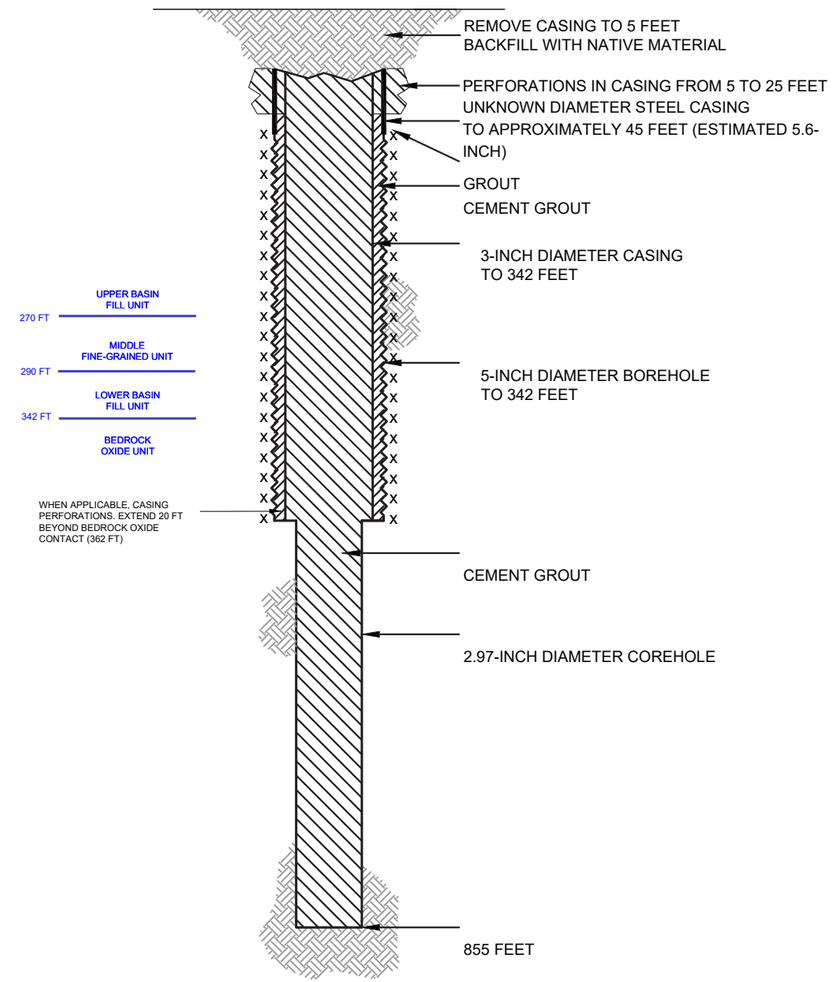
AS-BUILT COREHOLE 335S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 335S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 335S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		336S

State	County
Arizona	Pinal

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

Latitude 33.05151194

Longitude -111.4236198

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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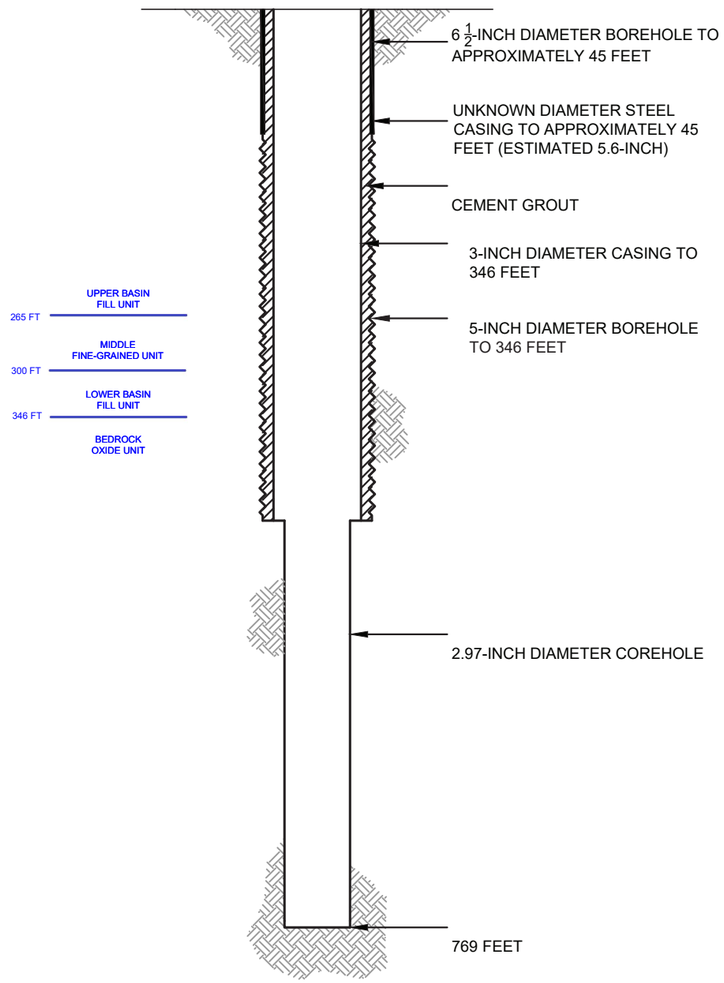
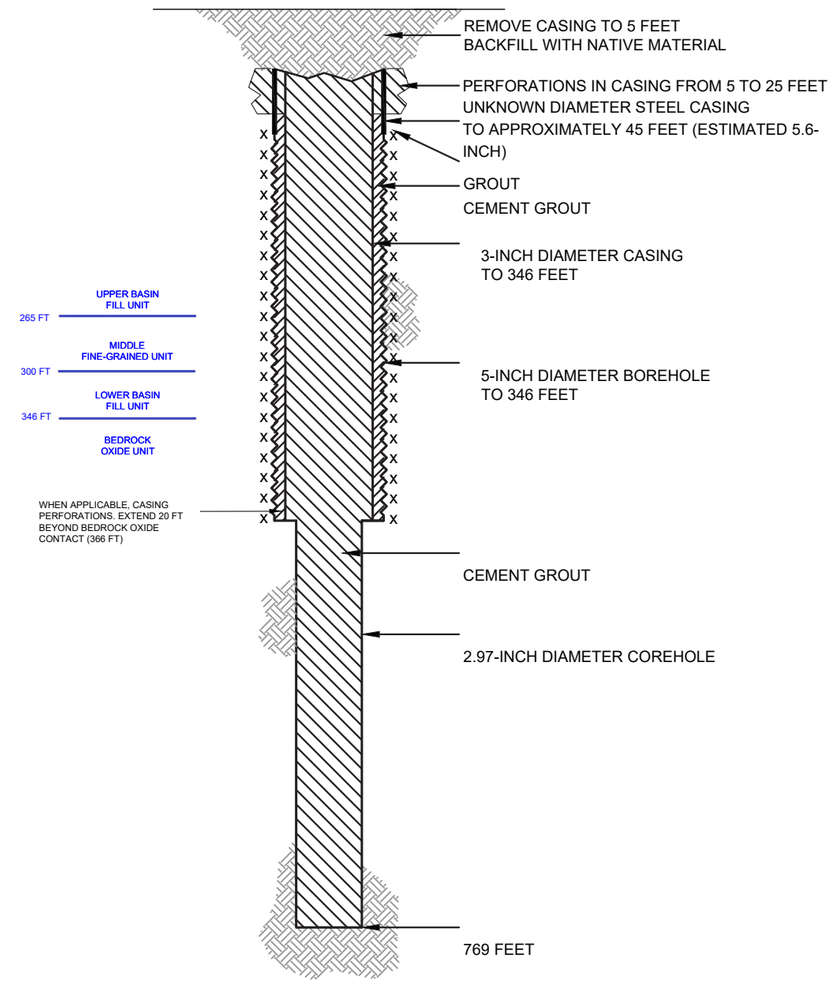
AS-BUILT COREHOLE 336S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 336S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 336S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		339S

State	County
Arizona	Pinal

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

Latitude 33.05270206

Surface Location

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

Longitude -111.4236132

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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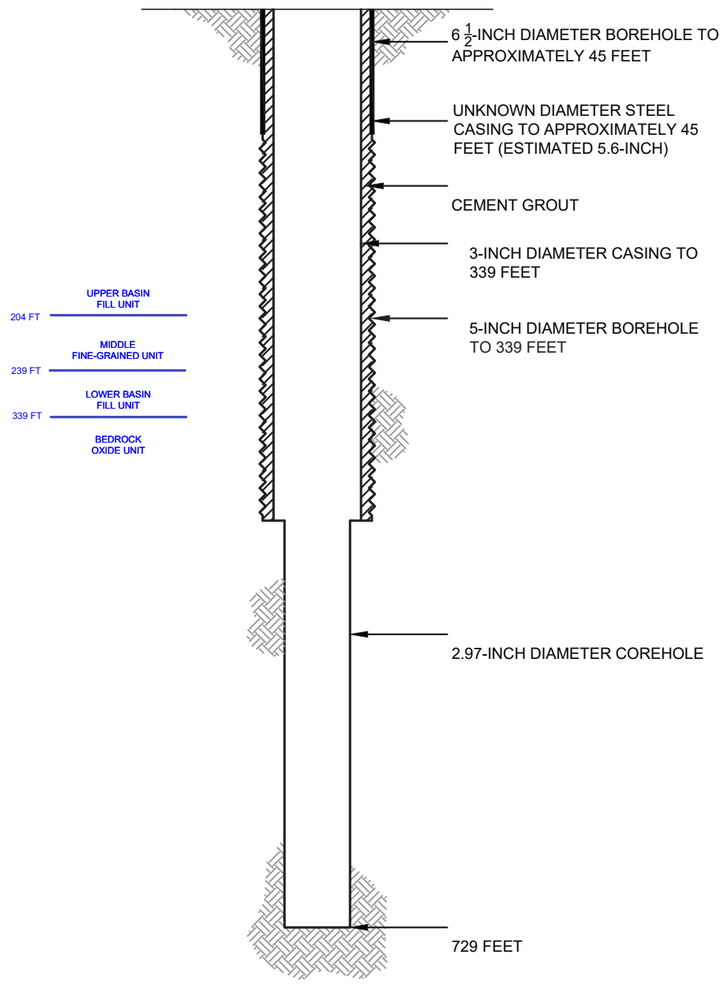
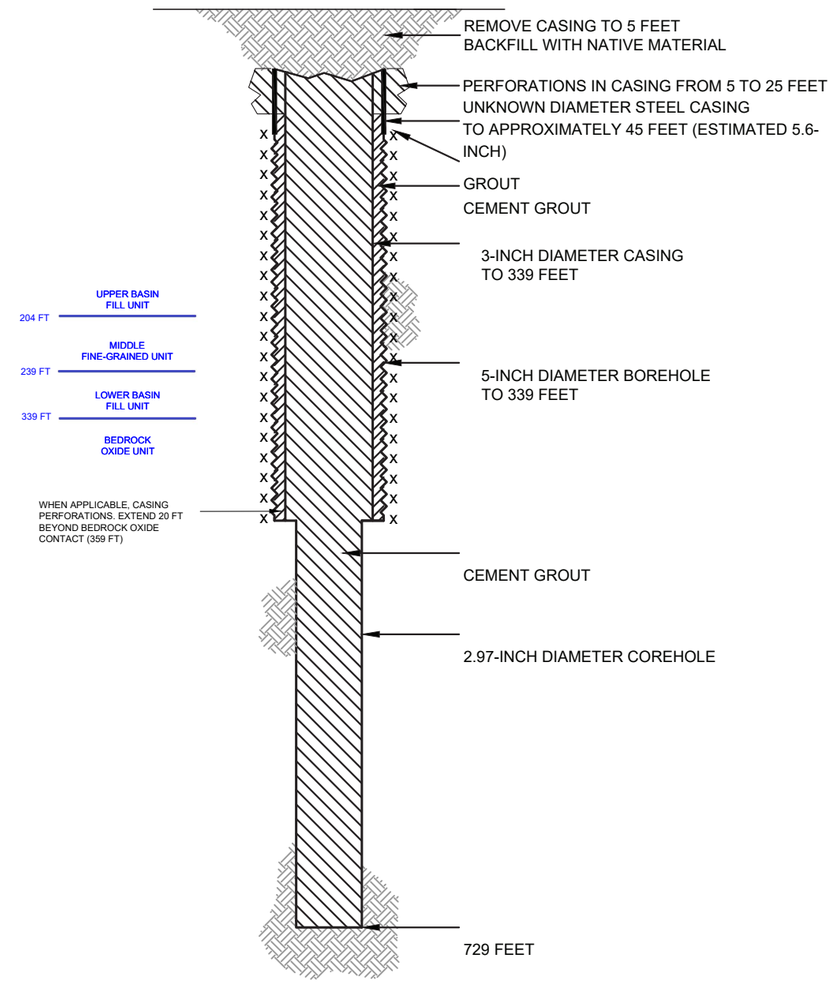
AS-BUILT COREHOLE 339S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 339S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 339S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

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R9UIC-AZ3-FY11-1		340S

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

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Longitude -111.4244291

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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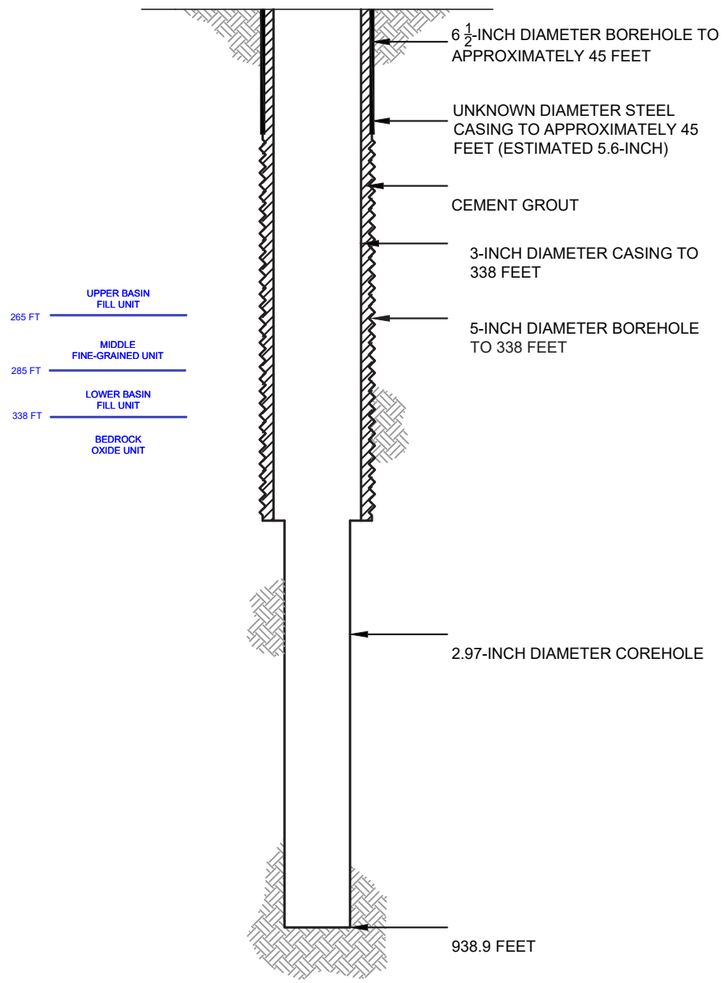
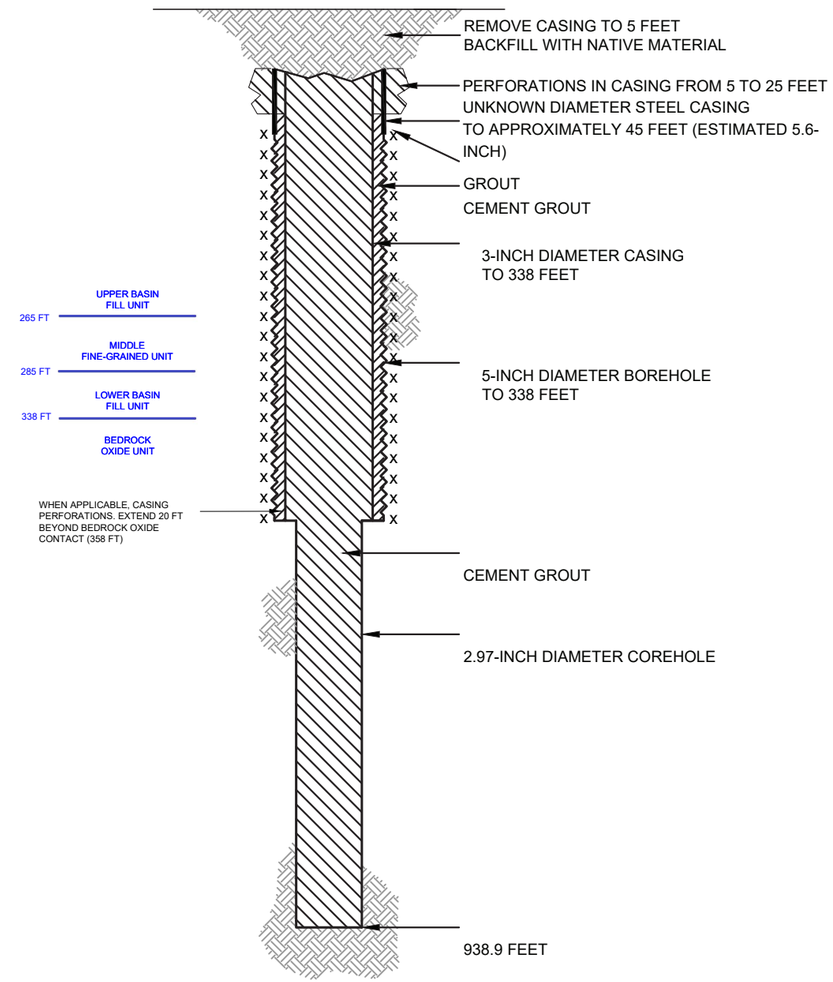
AS-BUILT COREHOLE 340S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 340S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 340S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		341S

State	County
Arizona	Pinal

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

Latitude 33.0527085

Longitude -111.425245

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP - General Manager		10/3/2019

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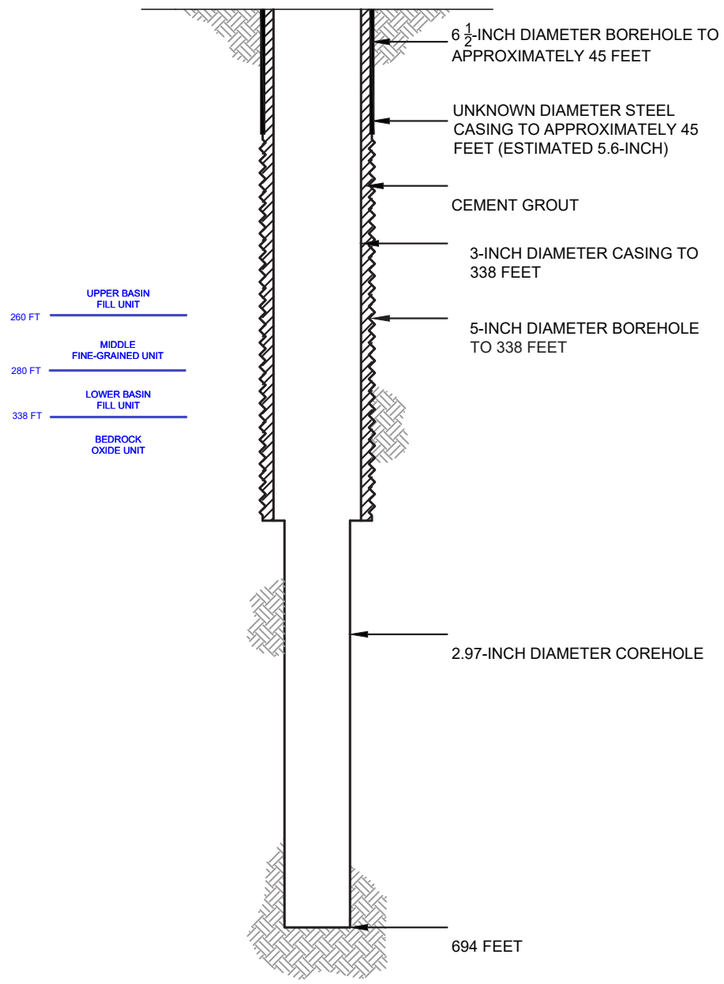
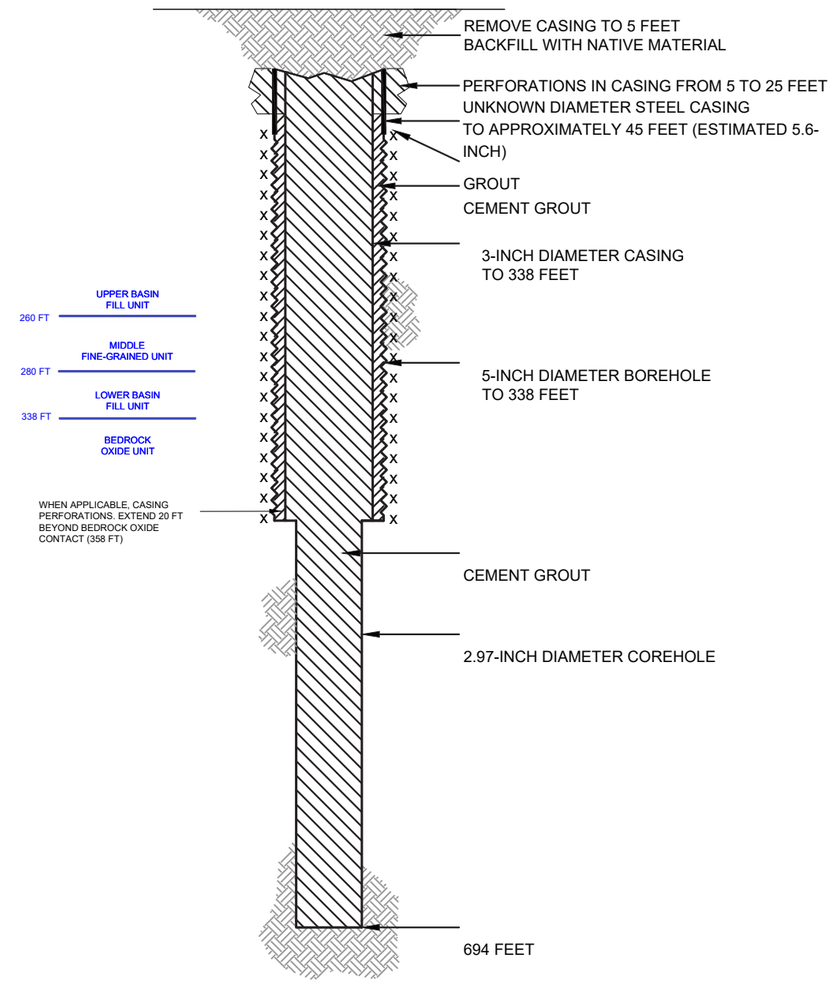
AS-BUILT COREHOLE 341S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 341S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 341S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		342S

State	County
Arizona	Pinal

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

Latitude 33.05271171

Longitude -111.4260609

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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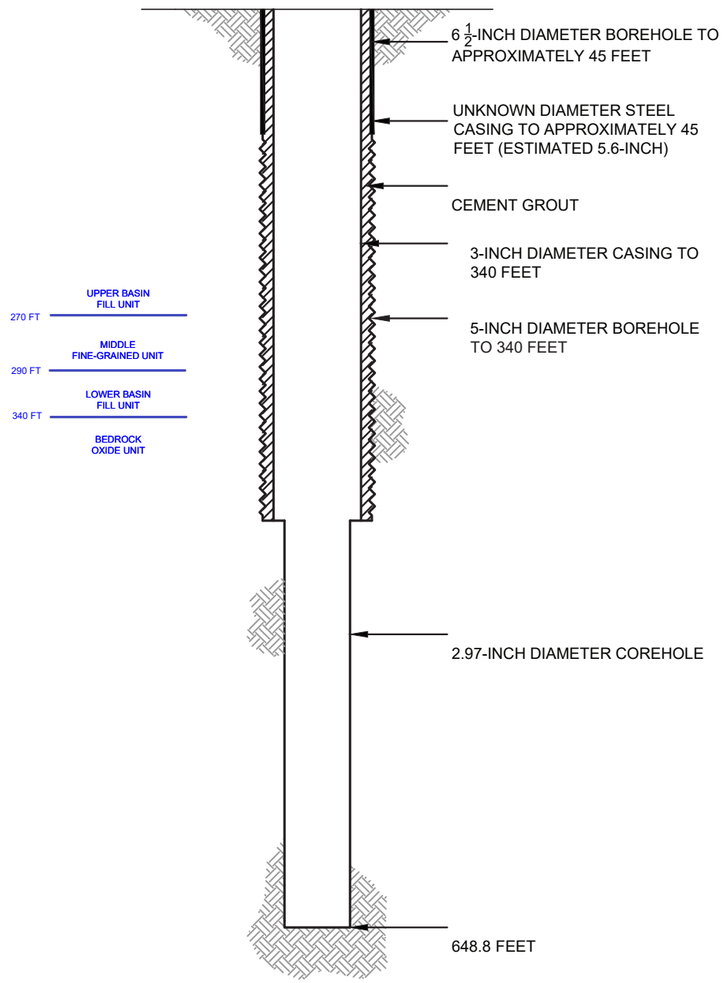
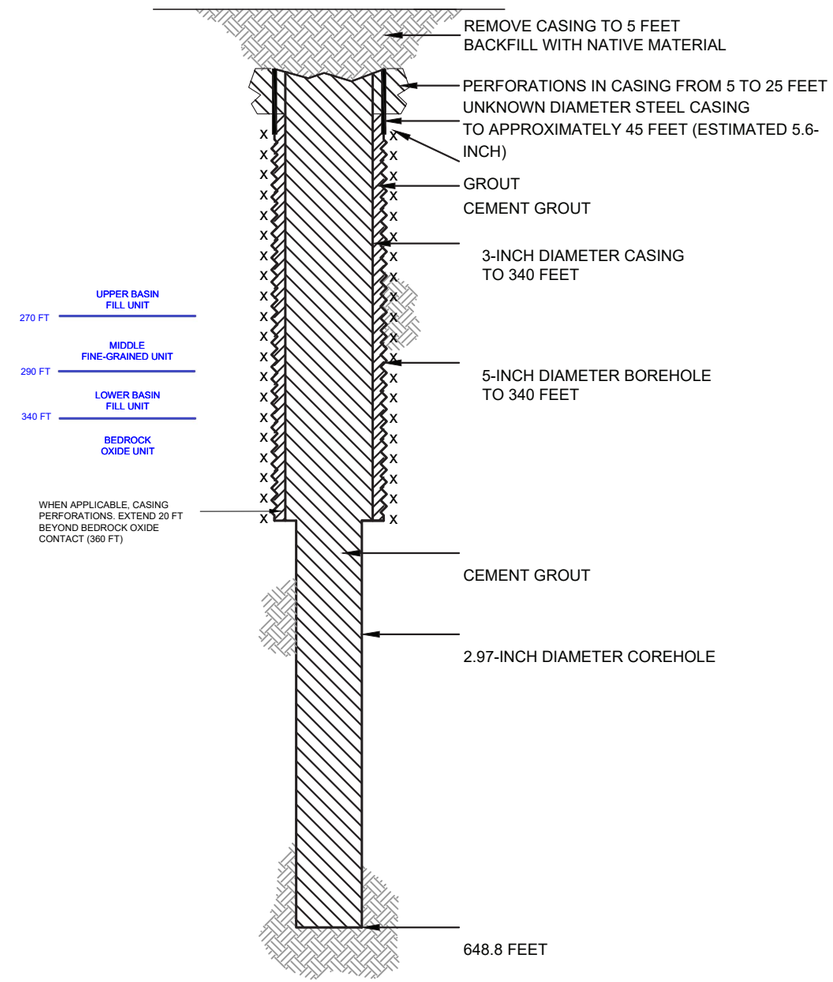
AS-BUILT COREHOLE 342S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 342S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 342S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		343S

State	County
Arizona	Pinal

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

Latitude 33.05271492

Surface Location

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

Longitude -111.4268768

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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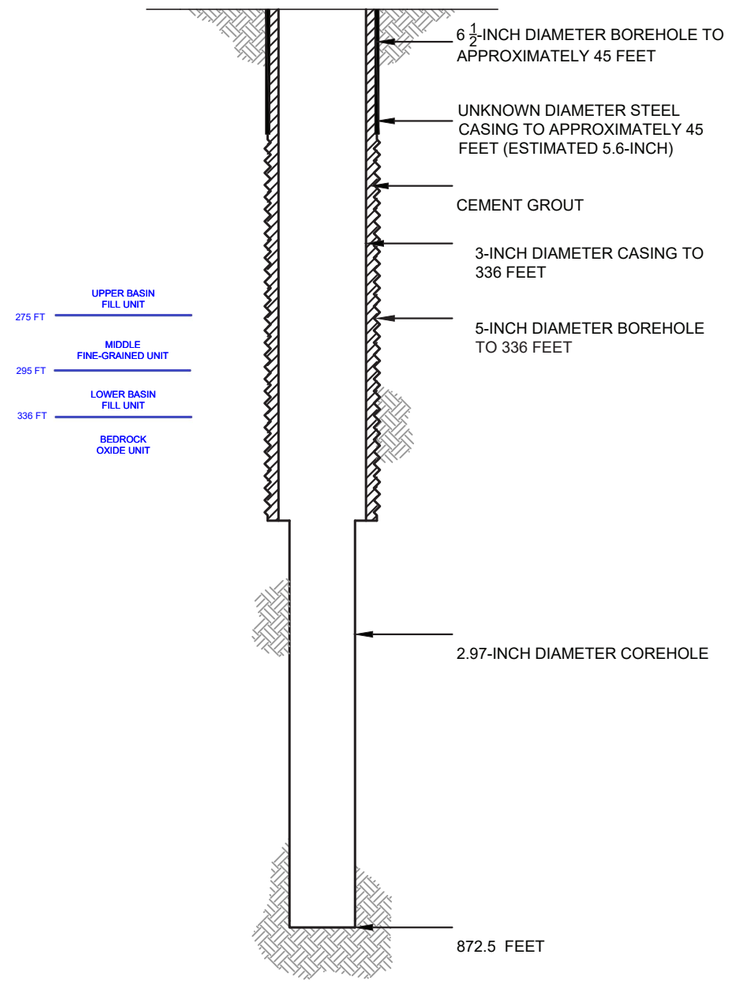
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

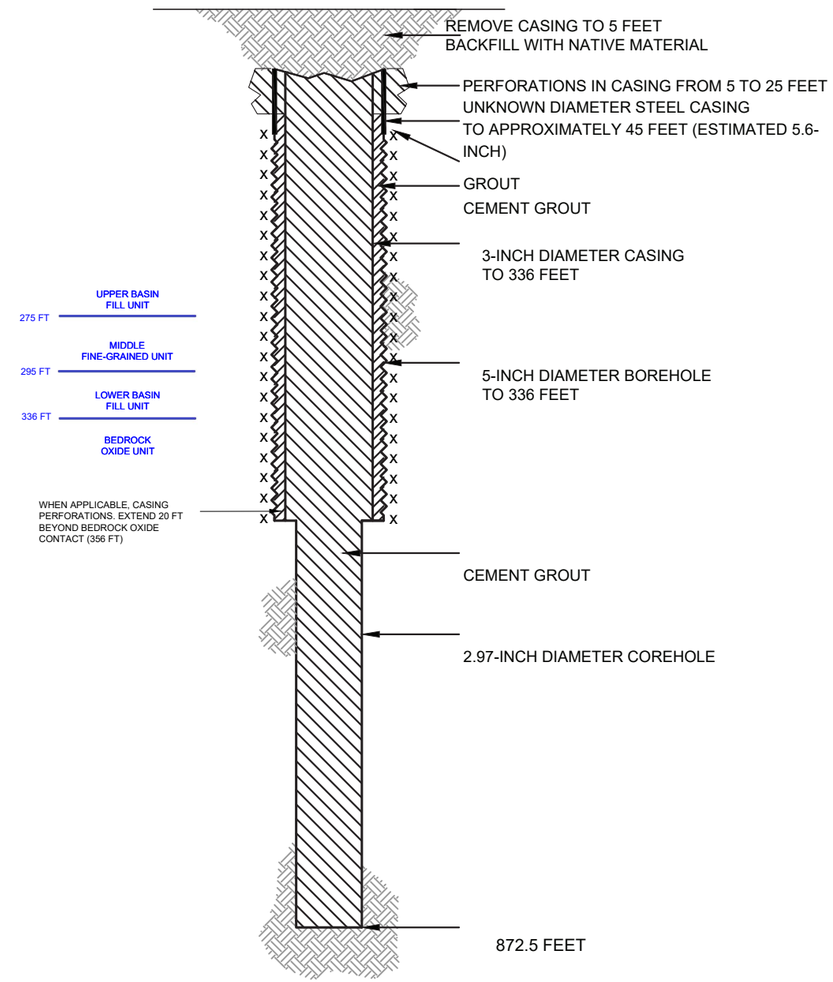
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 343S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 343S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 343S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		344S

State	County
Arizona	Pinal

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

Latitude 33.05211183

Surface Location

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

Longitude -111.4248404

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

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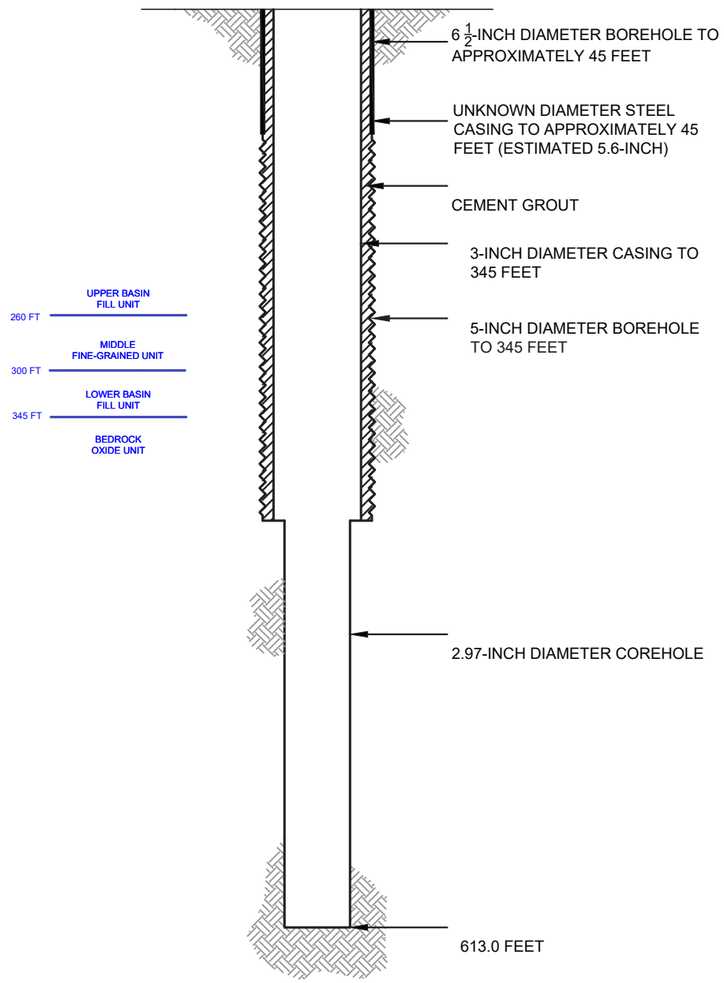
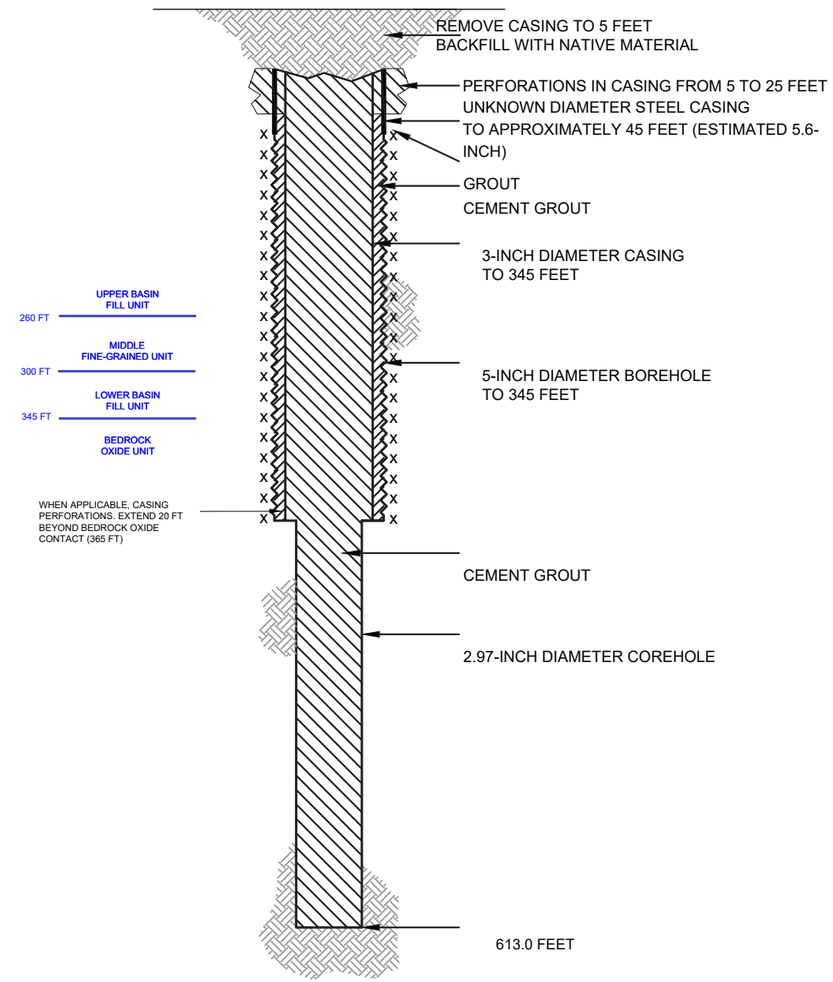
AS-BUILT COREHOLE 344S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 344S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 344S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		345S

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Arizona	Pinal

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_____ **ft. from (N/S)** _____ **Line of quarter section**

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For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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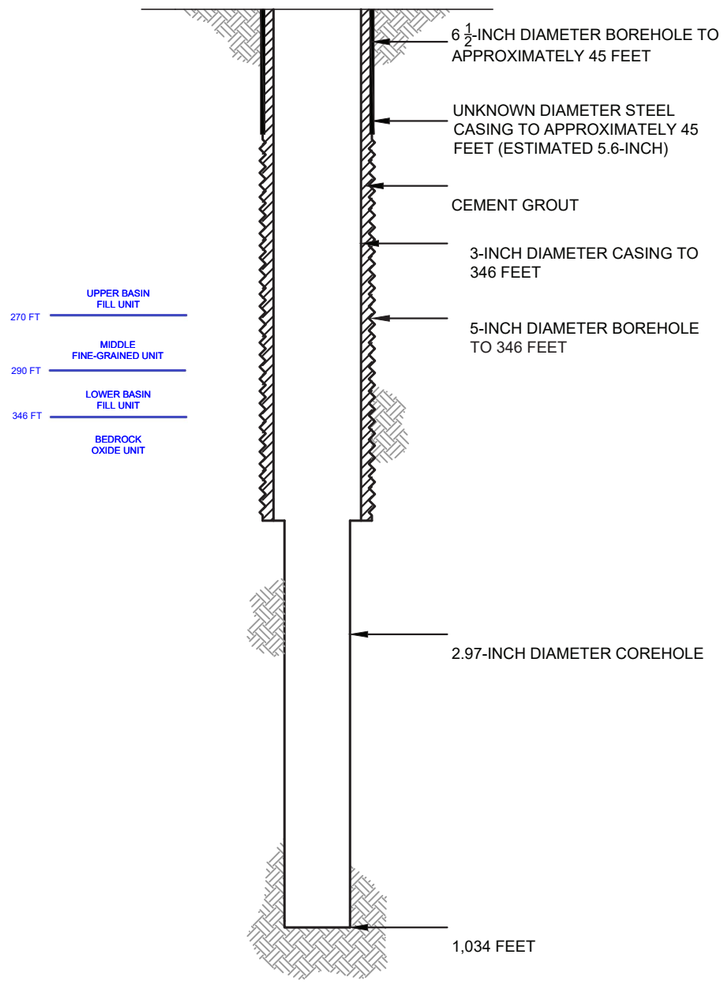
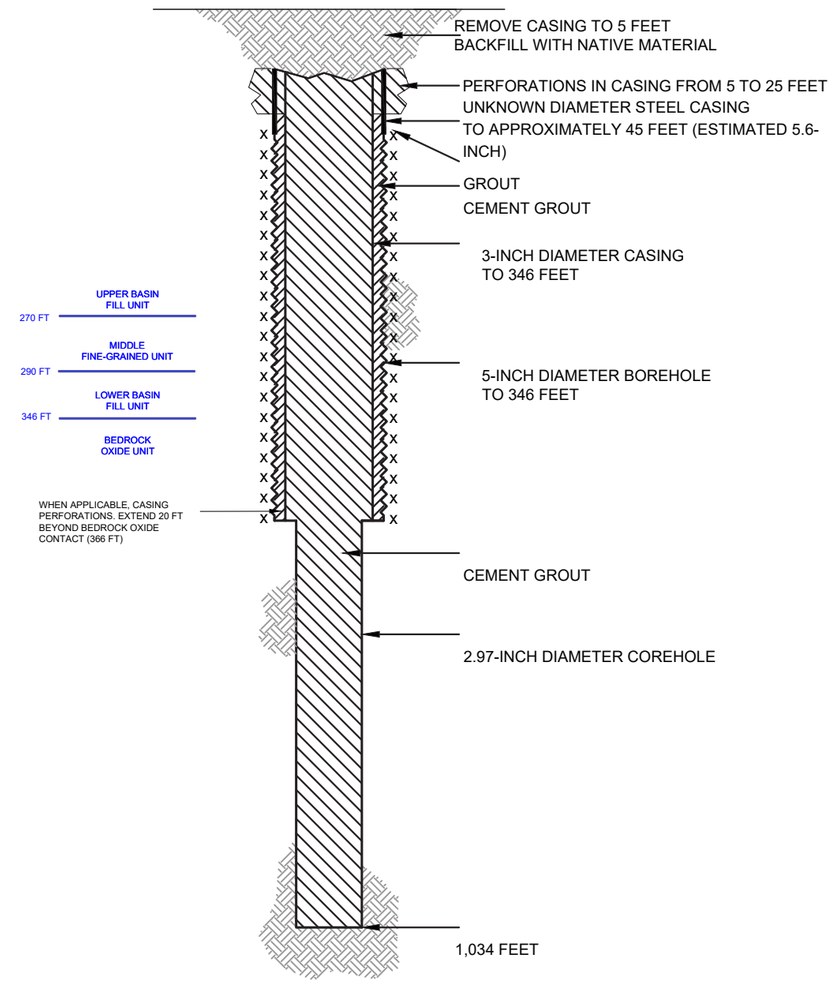
AS-BUILT COREHOLE 345S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 345S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 345S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		346S

State	County
Arizona	Pinal

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

Latitude 33.05272132

Longitude -111.4285086

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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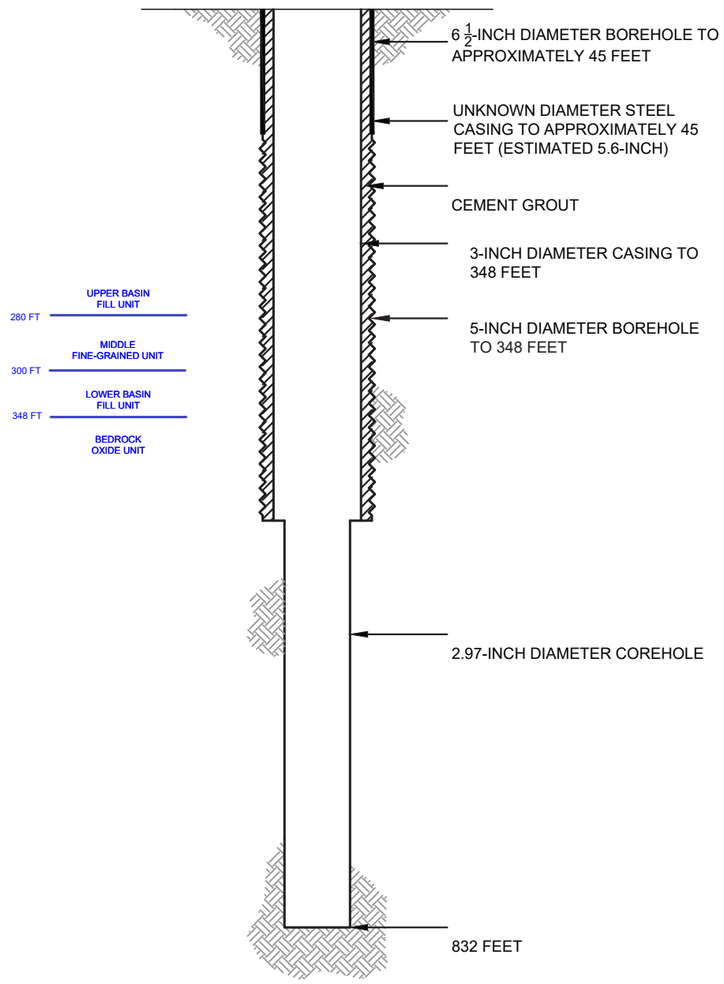
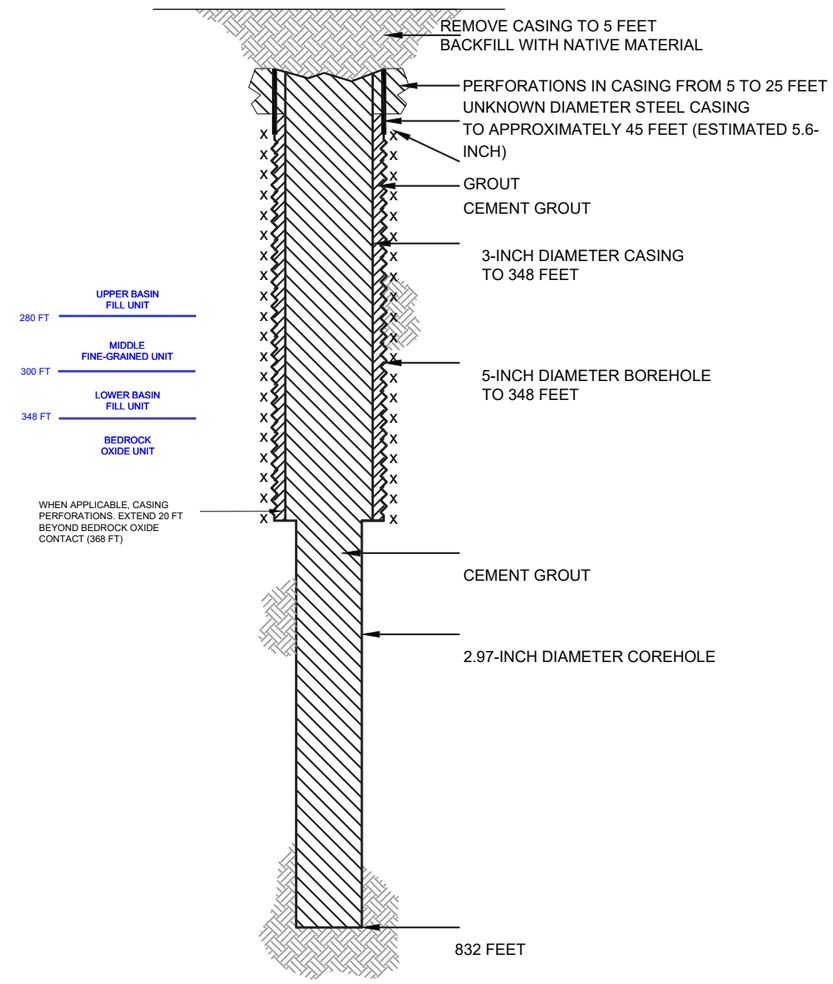
AS-BUILT COREHOLE 346S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 346S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 346S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		347S

State	County
Arizona	Pinal

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

Latitude 33.05272451

Longitude -111.4293245

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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

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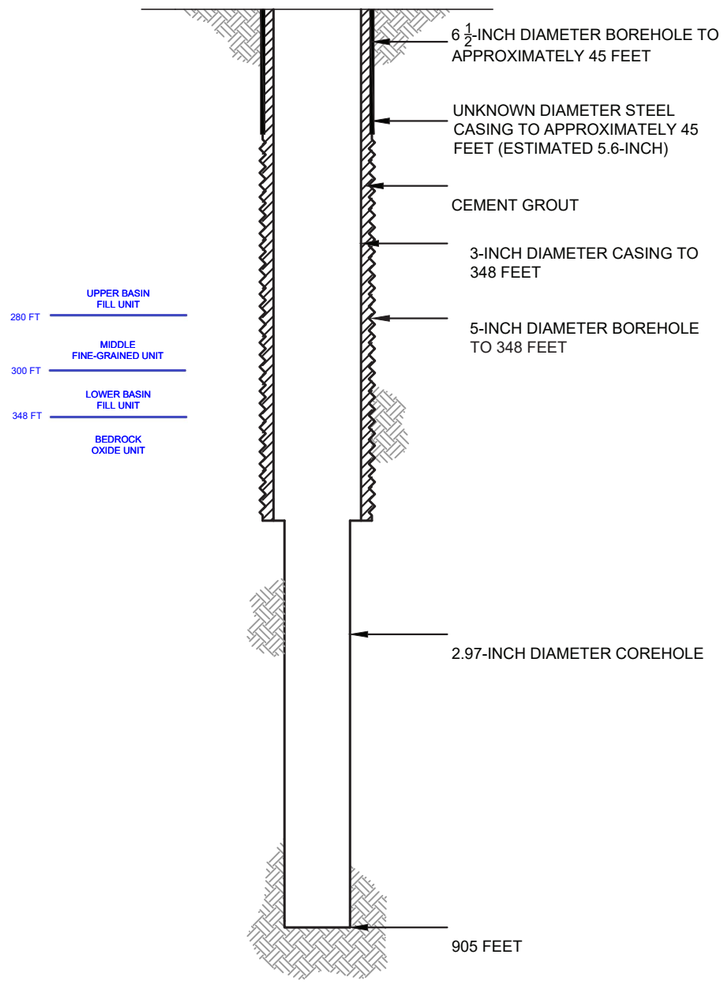
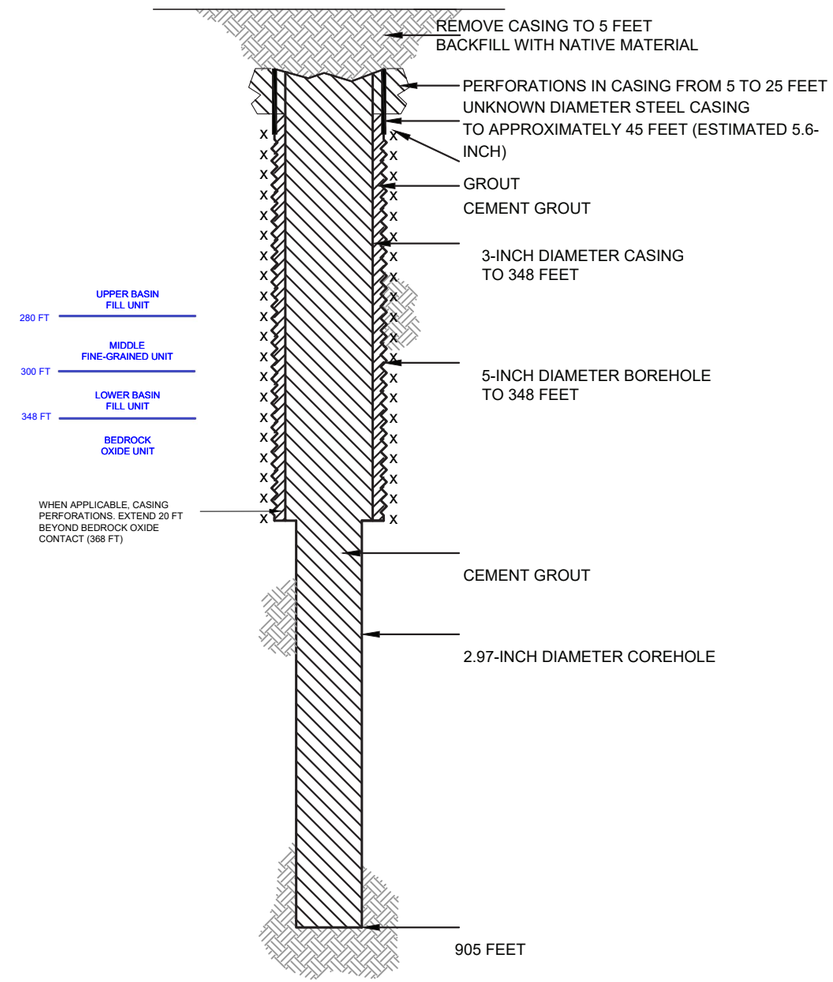
AS-BUILT COREHOLE 347S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 347S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 347S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		348S

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Surface Location

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Longitude -111.4301404

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

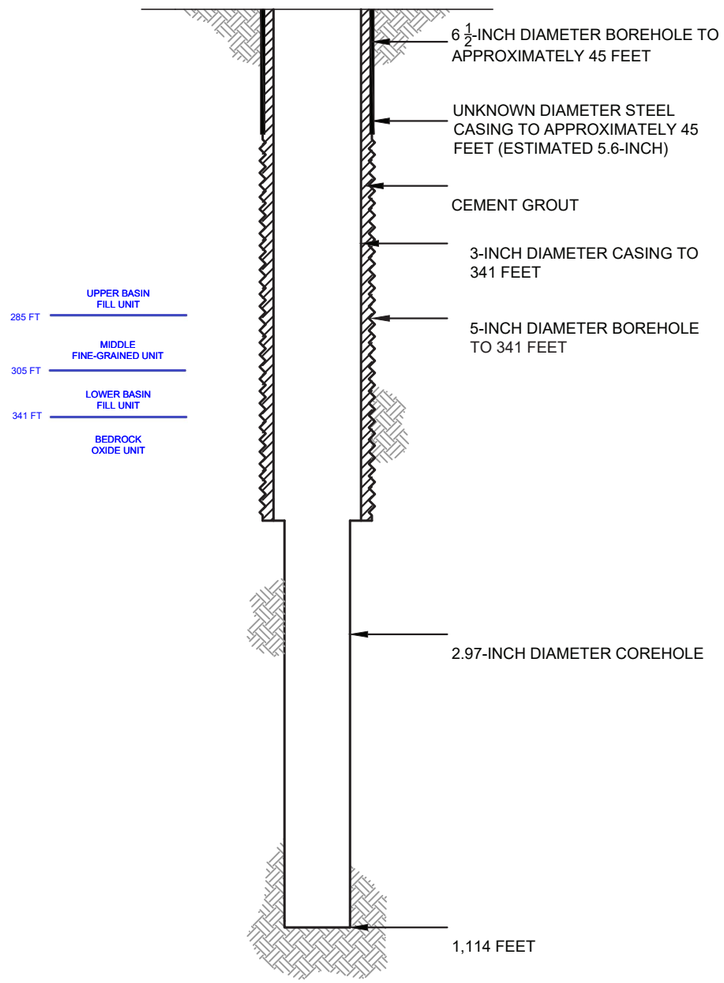
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

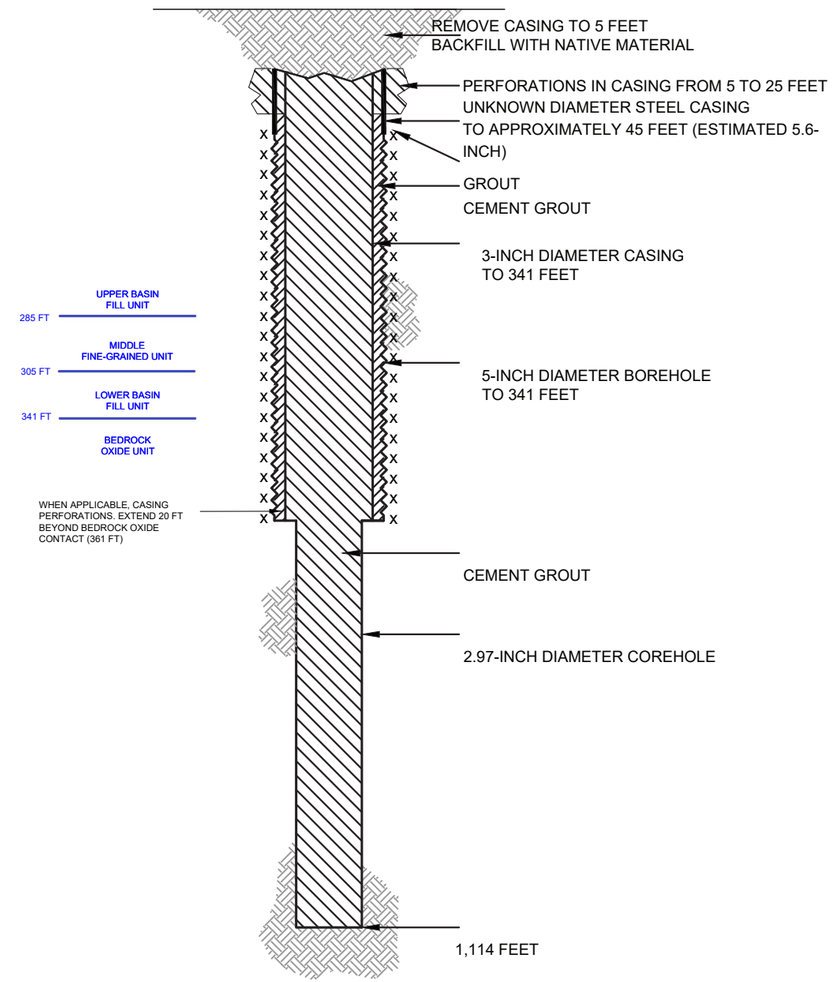
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 348S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 348S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 348S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		349S

State	County
Arizona	Pinal

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

Latitude 33.05213104

Longitude -111.4297357

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

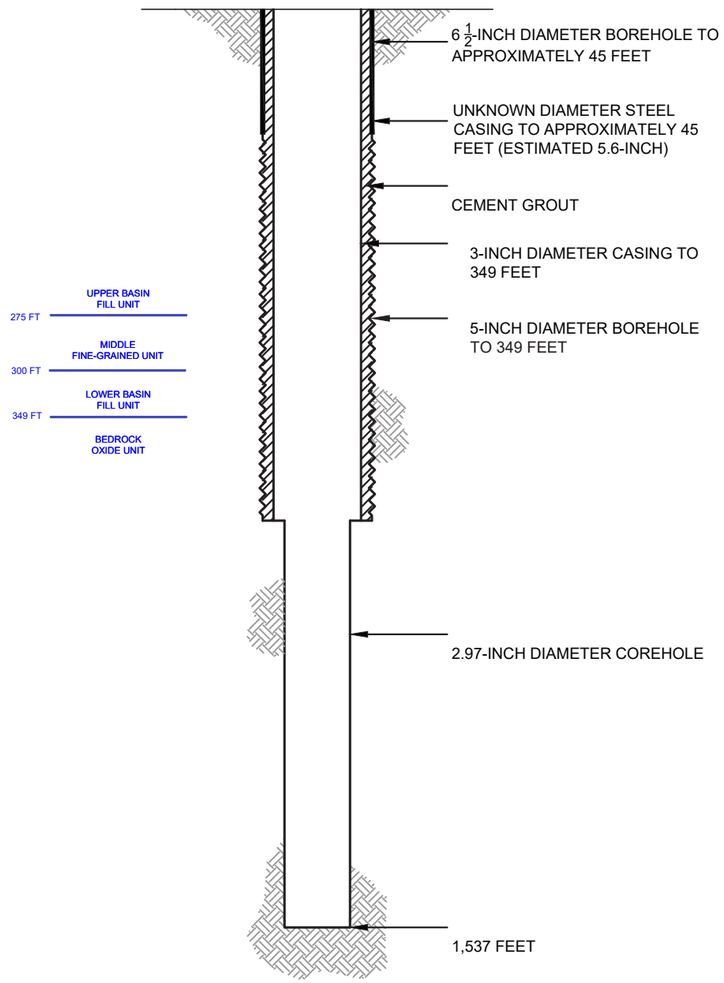
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

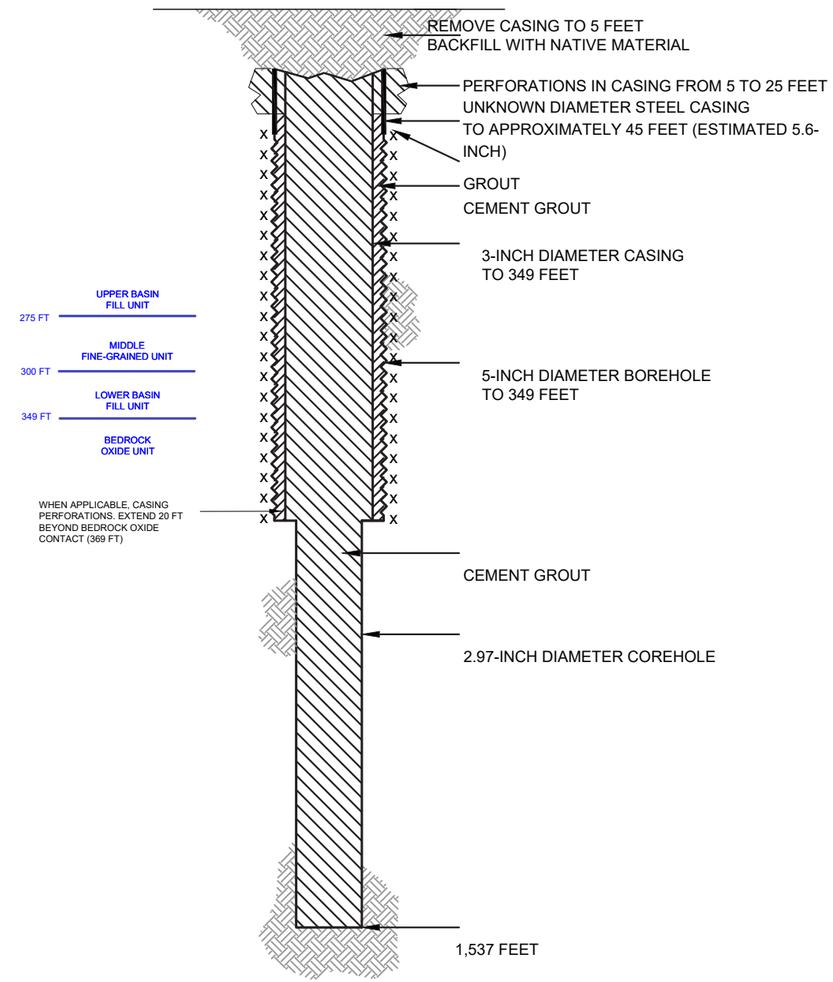
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 349S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 349S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 349S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		350S

State	County
Arizona	Pinal

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

Latitude 33.05153757

Longitude -111.430147

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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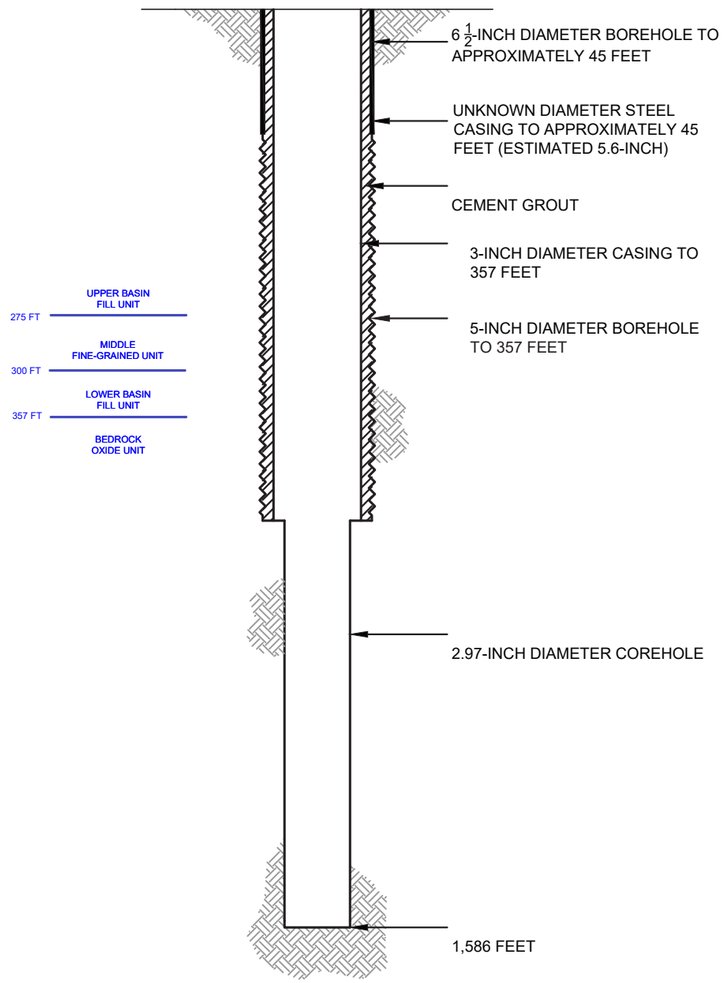
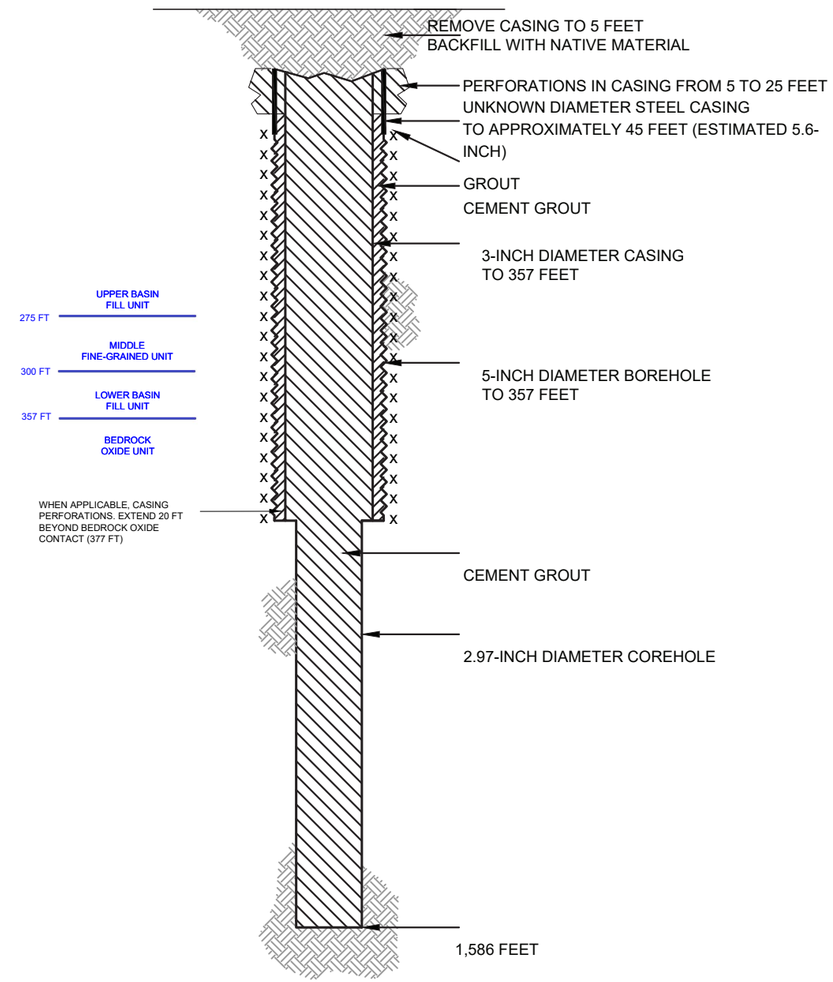
AS-BUILT COREHOLE 350S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 350S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 350S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		351S

State	County
Arizona	Pinal

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

Latitude 33.05273087

Surface Location

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

Longitude -111.4309563

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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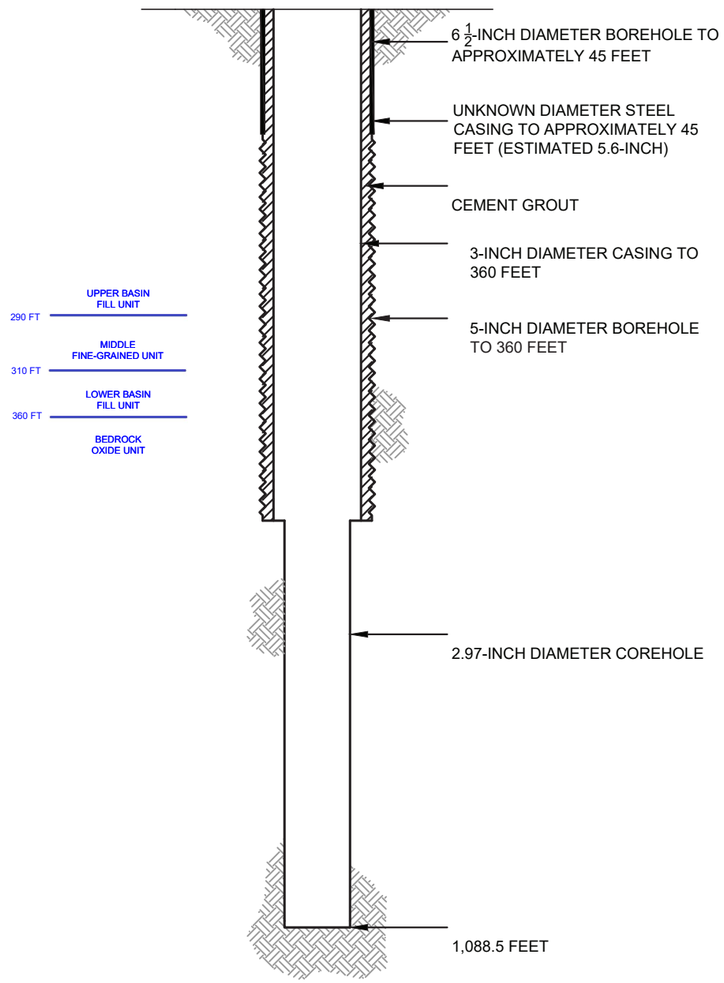
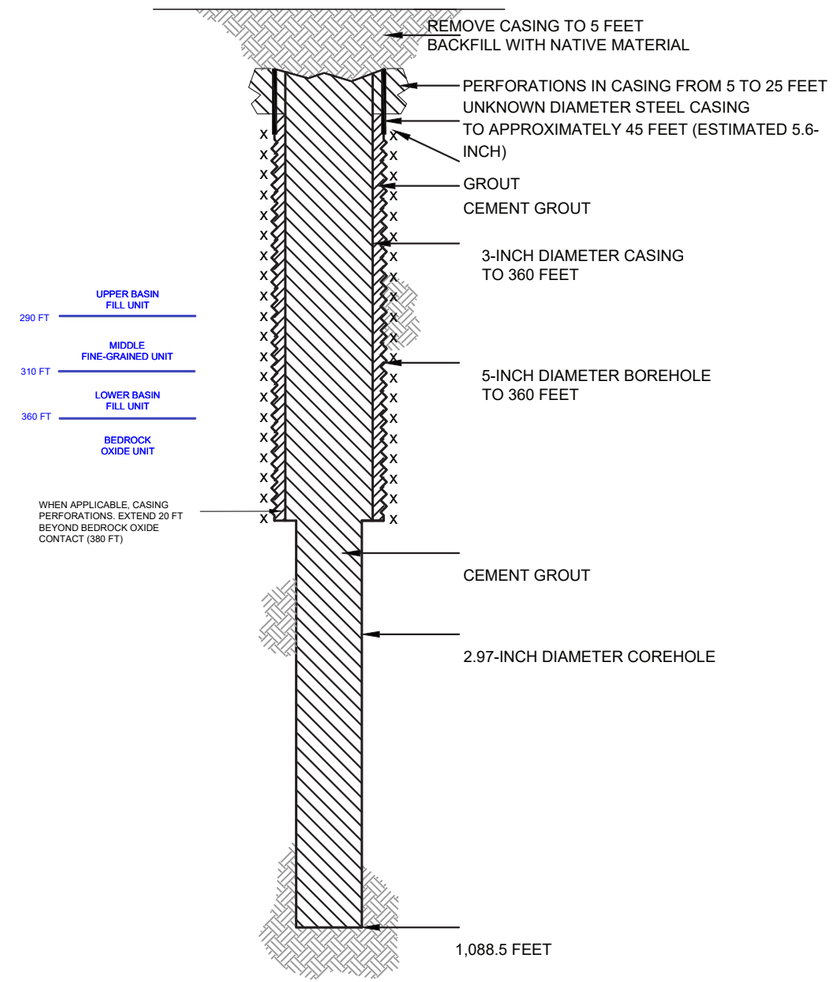
AS-BUILT COREHOLE 351S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 351S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 351S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		352S

State	County
Arizona	Pinal

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

Latitude 33.05154075

Surface Location

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

Longitude -111.4309629

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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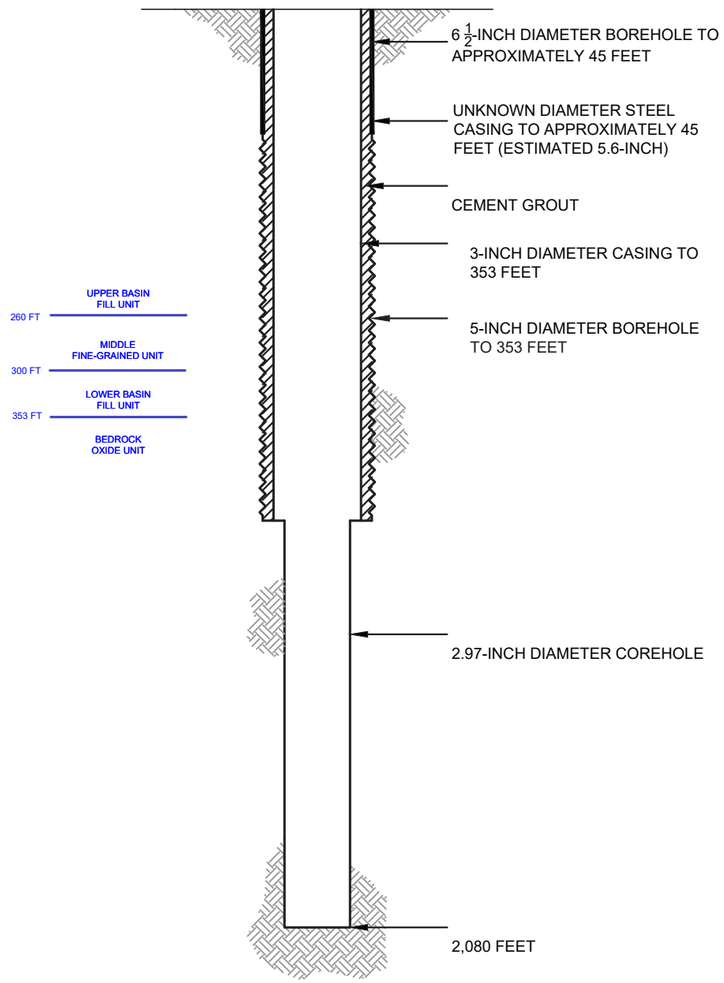
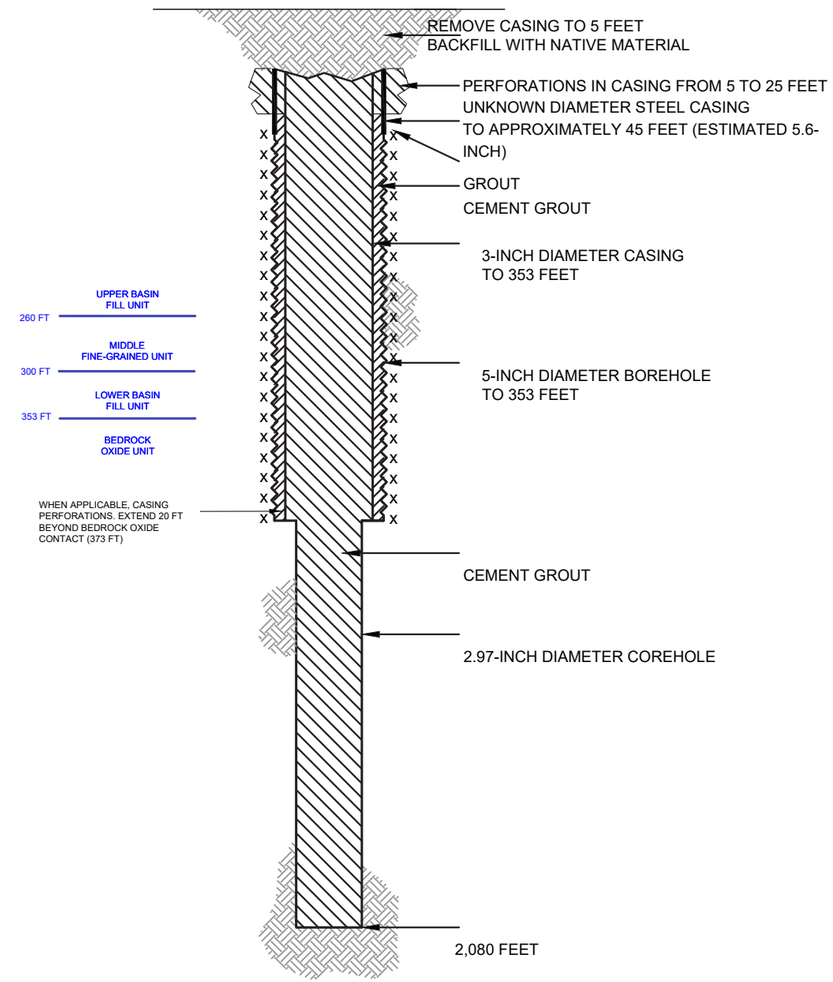
AS-BUILT COREHOLE 352S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 352S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 352S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		353S

State	County
Arizona	Pinal

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

Latitude 33.05270684

Longitude -111.4317724

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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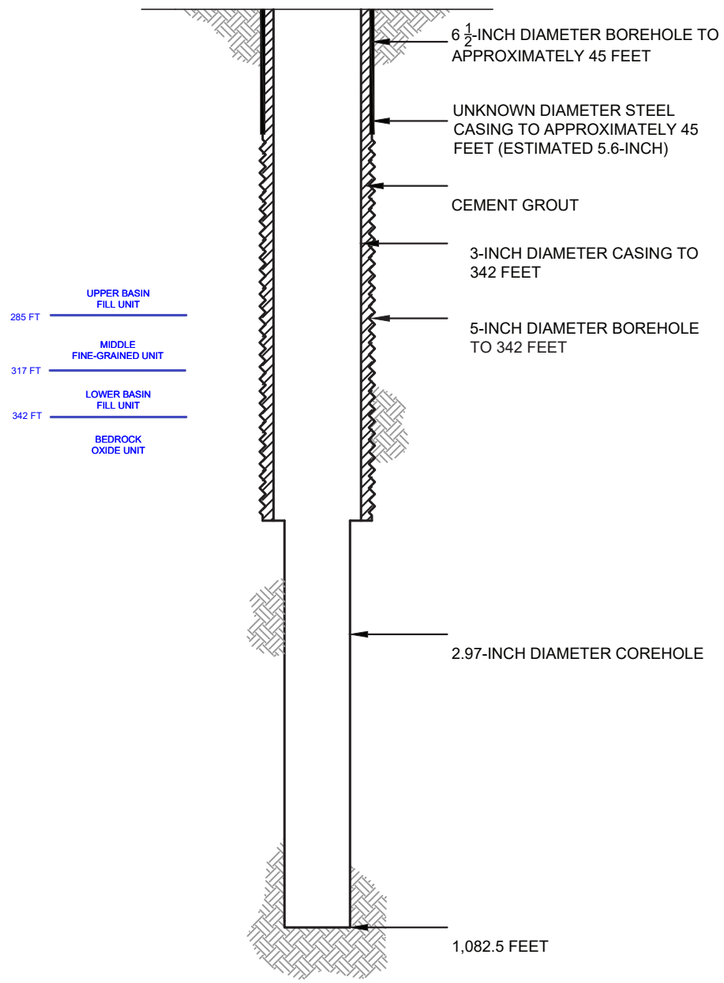
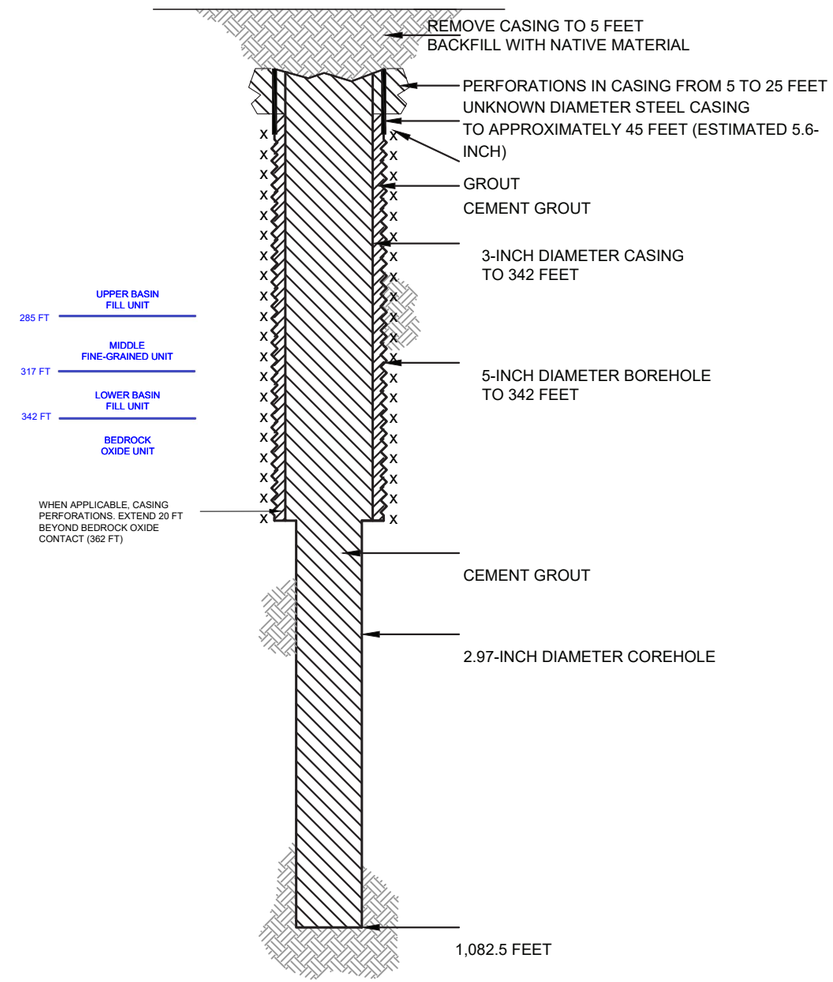


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 353S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 353S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

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R9UIC-AZ3-FY11-1		354S

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

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Surface Location

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_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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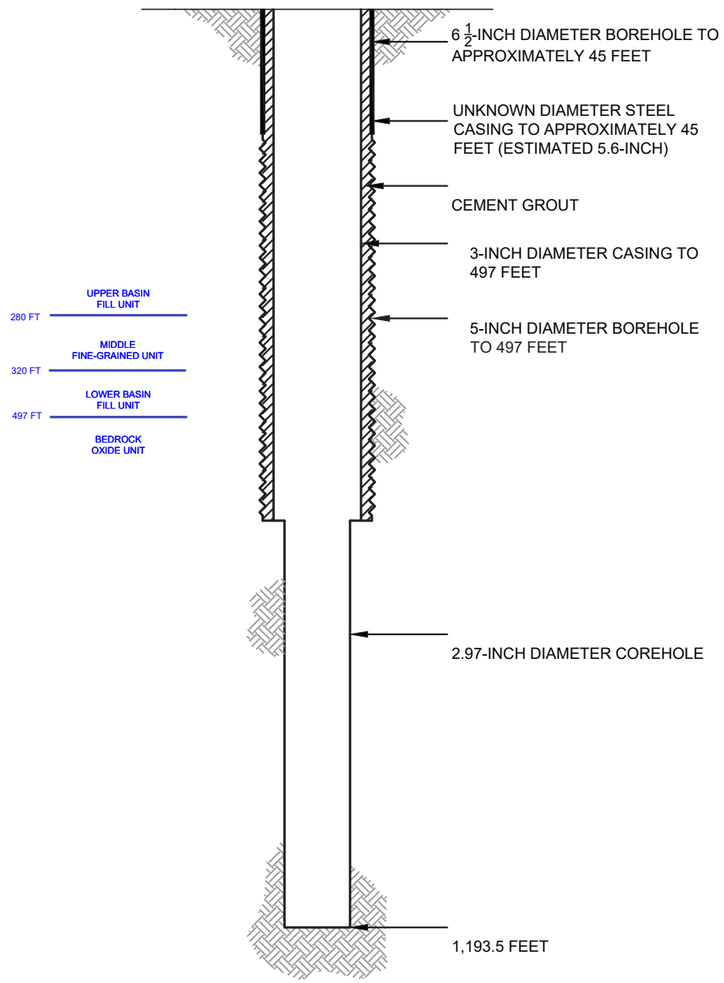
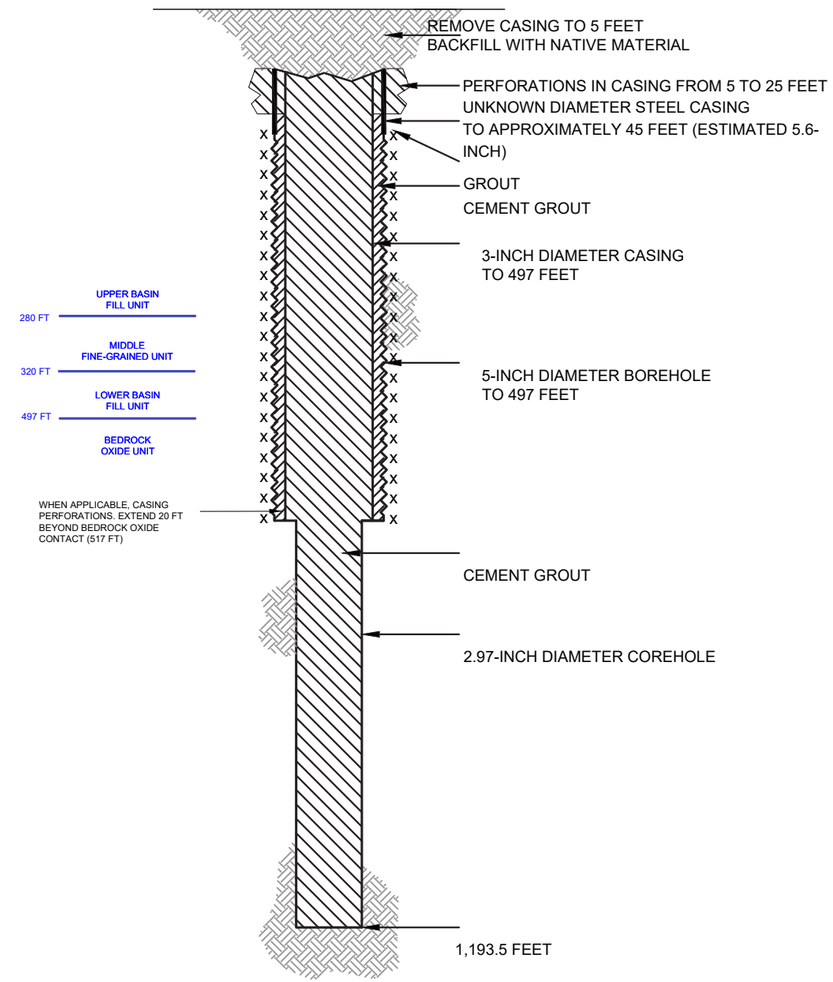
AS-BUILT COREHOLE 354S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 354S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 354S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		355S

State	County
Arizona	Pinal

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

Latitude 33.05214374

Longitude -111.4329993

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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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 - General Manager		10/3/2019

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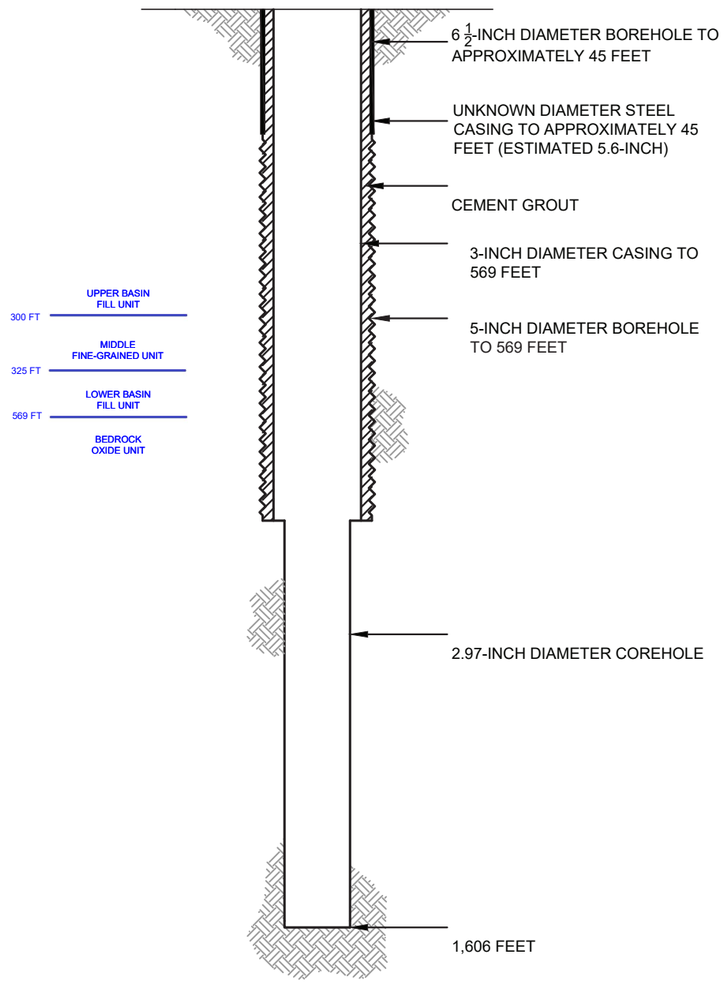
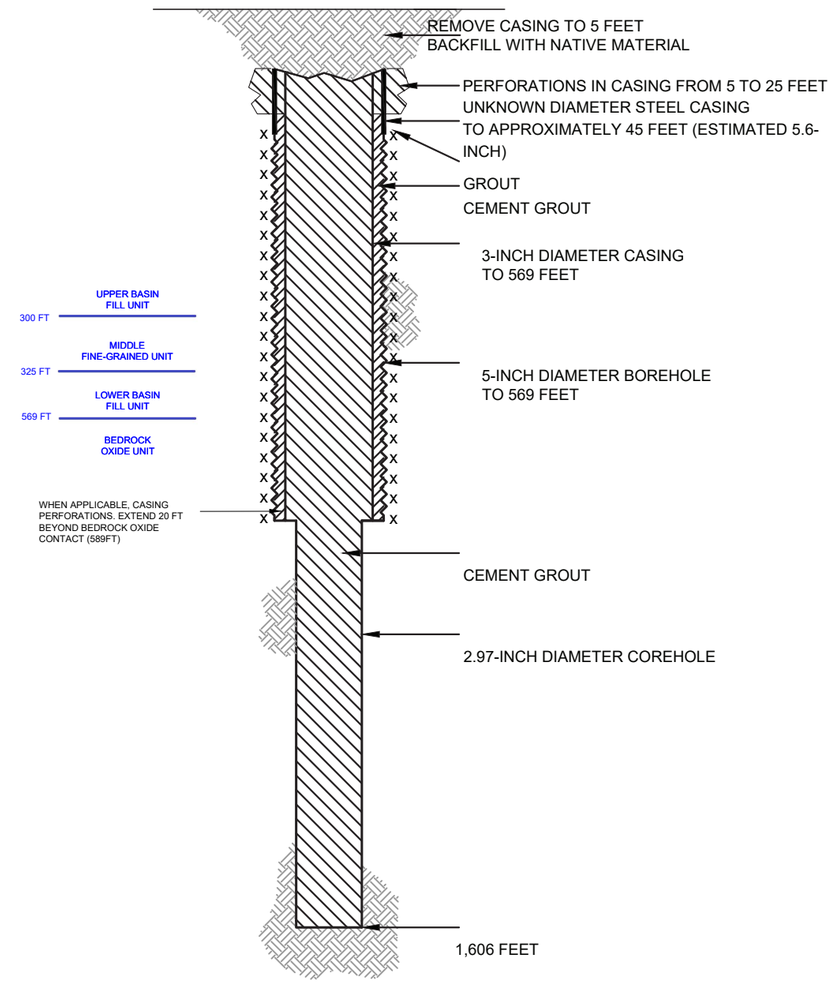
AS-BUILT COREHOLE 355S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 355S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 355S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		358S

State	County
Arizona	Pinal

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

Latitude 33.0503538

Longitude -111.4317853

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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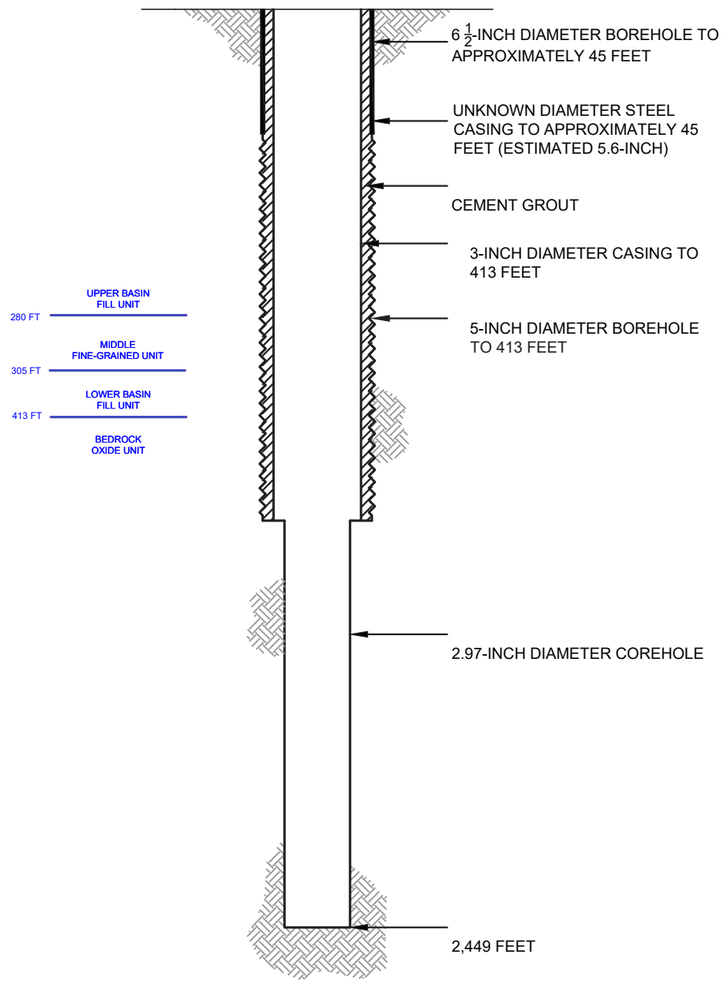
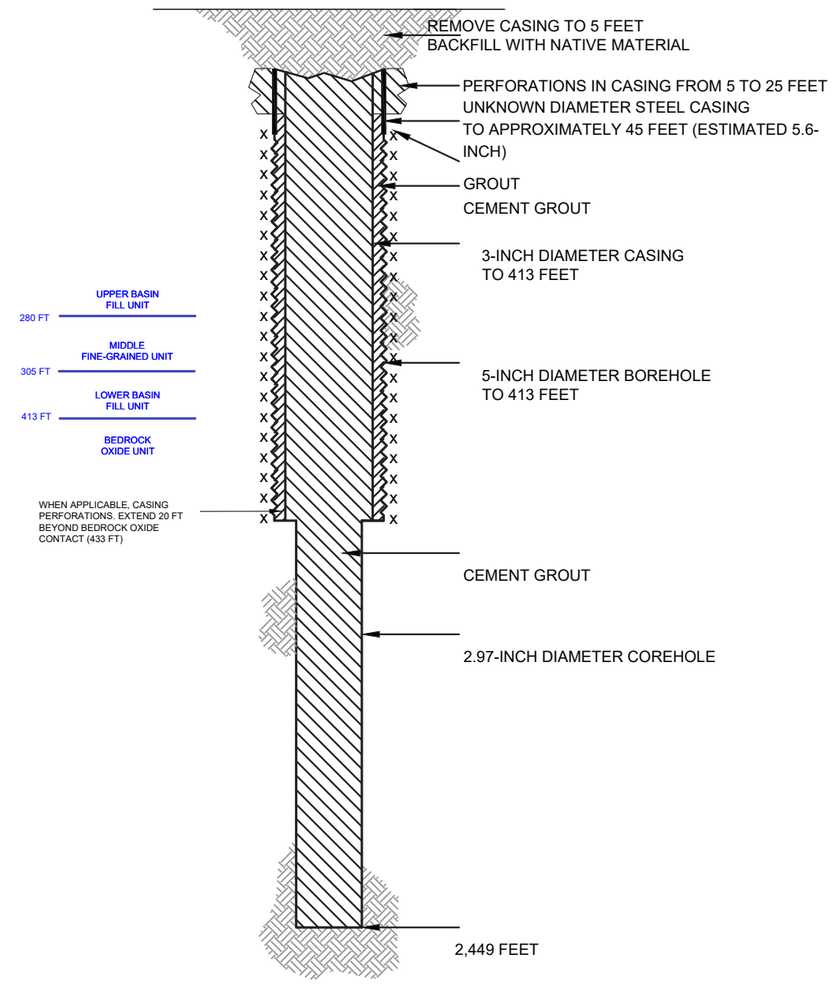
AS-BUILT COREHOLE 358S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 358S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 358S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		359S

State	County
Arizona	Pinal

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

Latitude 33.04975715

Longitude -111.4313806

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

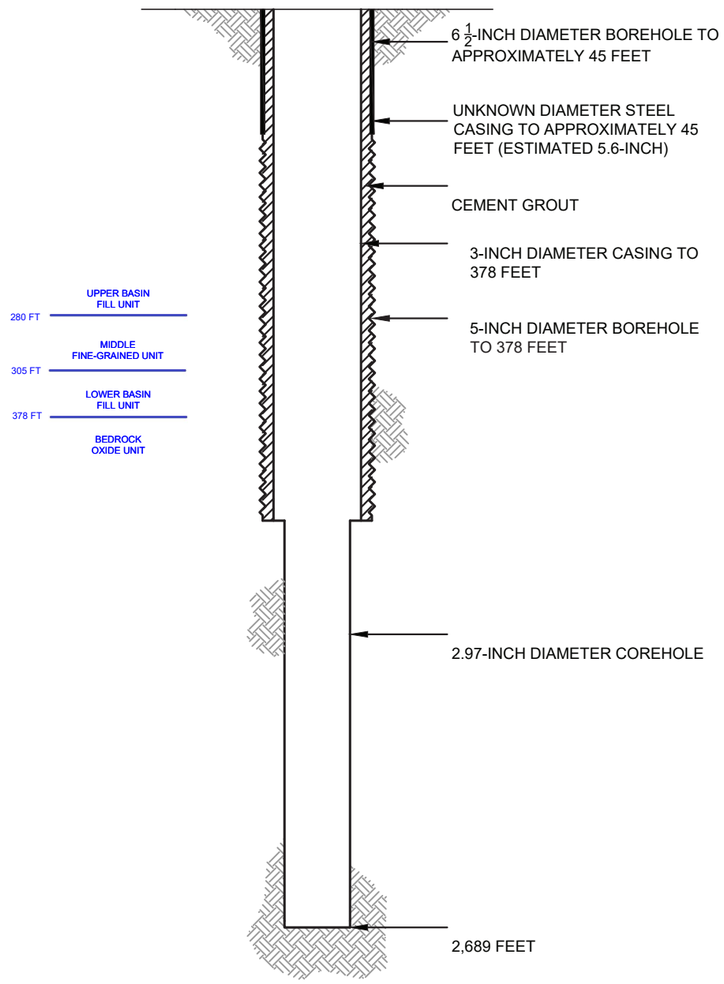
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

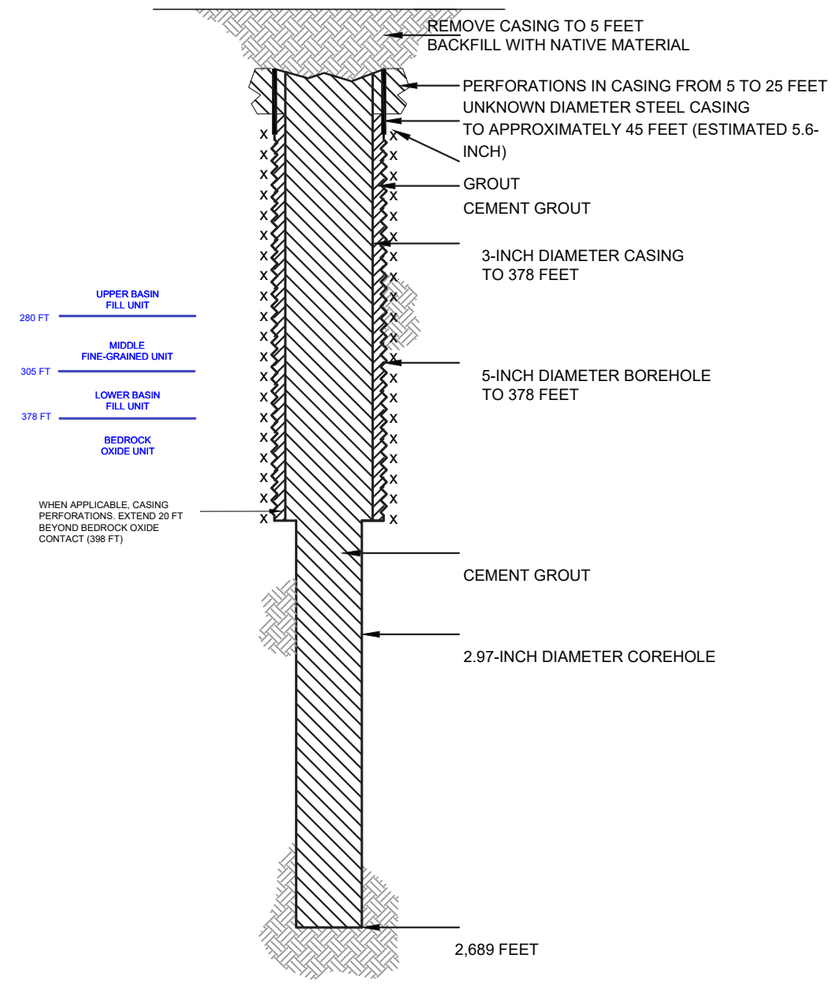
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 359S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 359S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 359S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		360S

State	County
Arizona	Pinal

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

Latitude 33.05035062

Longitude -111.4309694

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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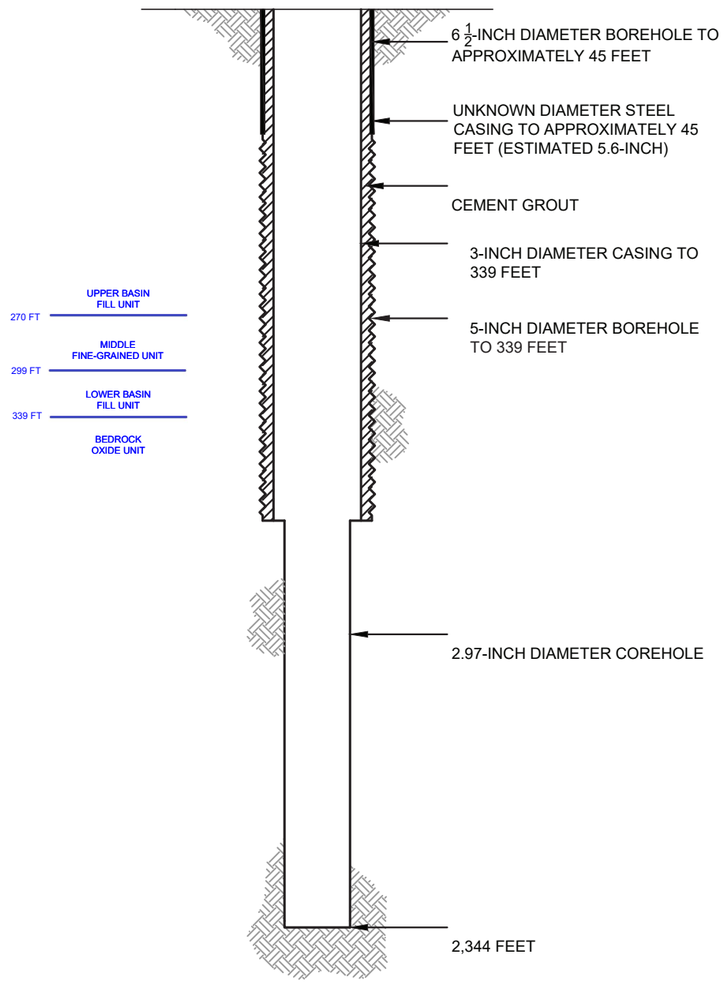
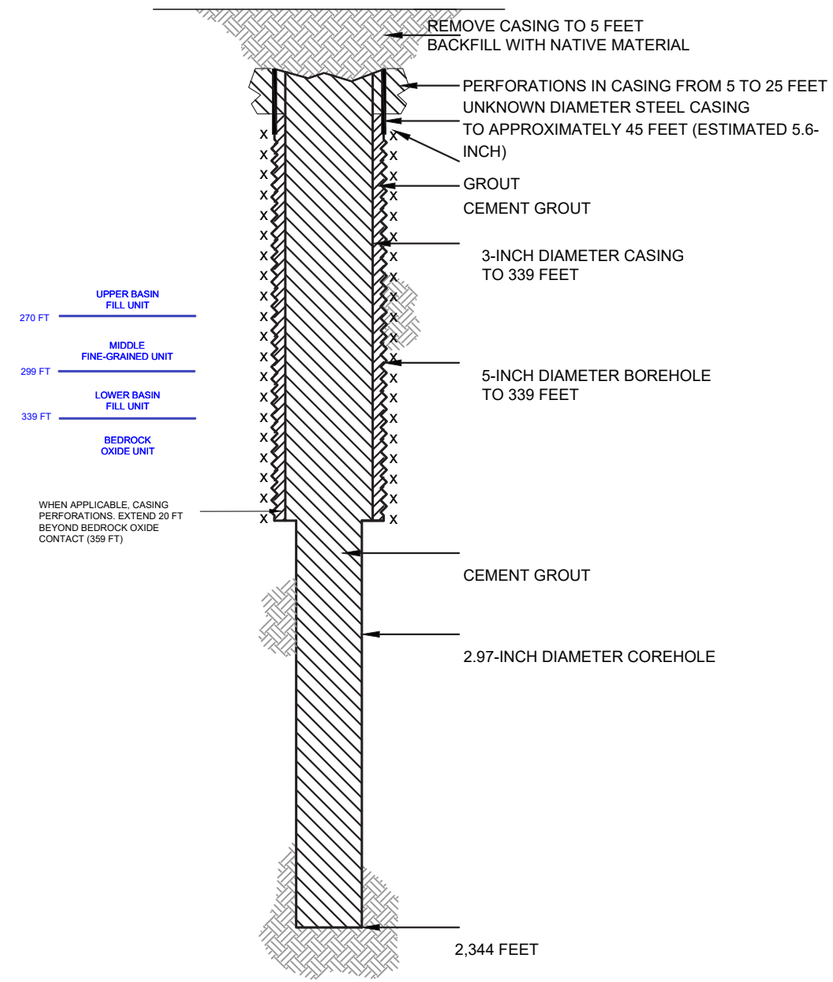
AS-BUILT COREHOLE 360S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 360S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 360S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		361S

State	County
Arizona	Pinal

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

Latitude 33.0509441

Longitude -111.4305582

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
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For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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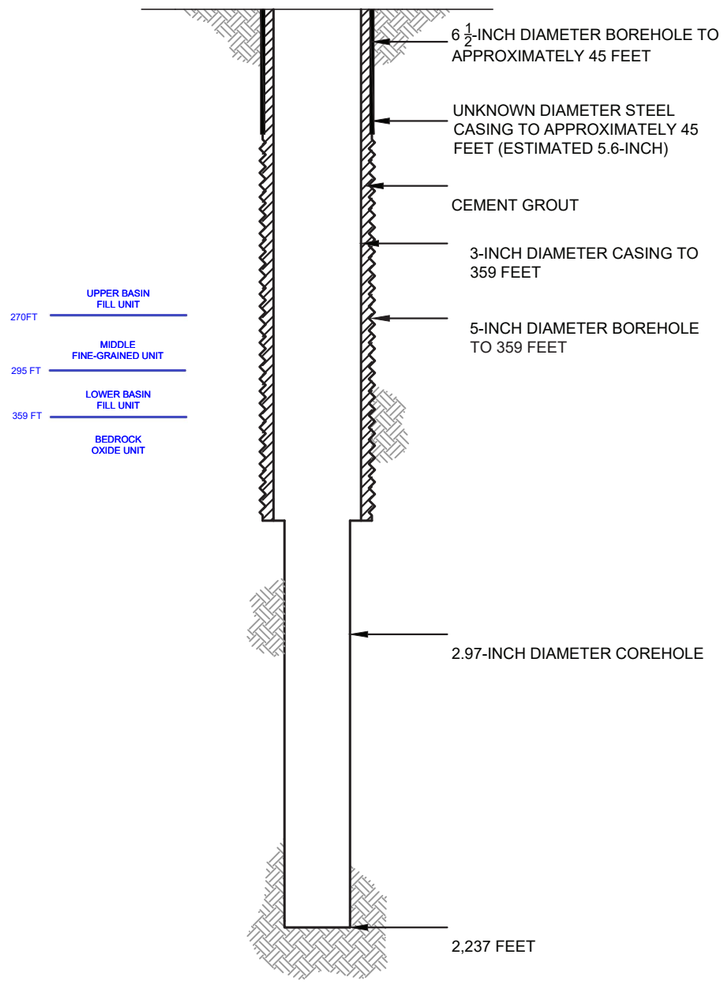
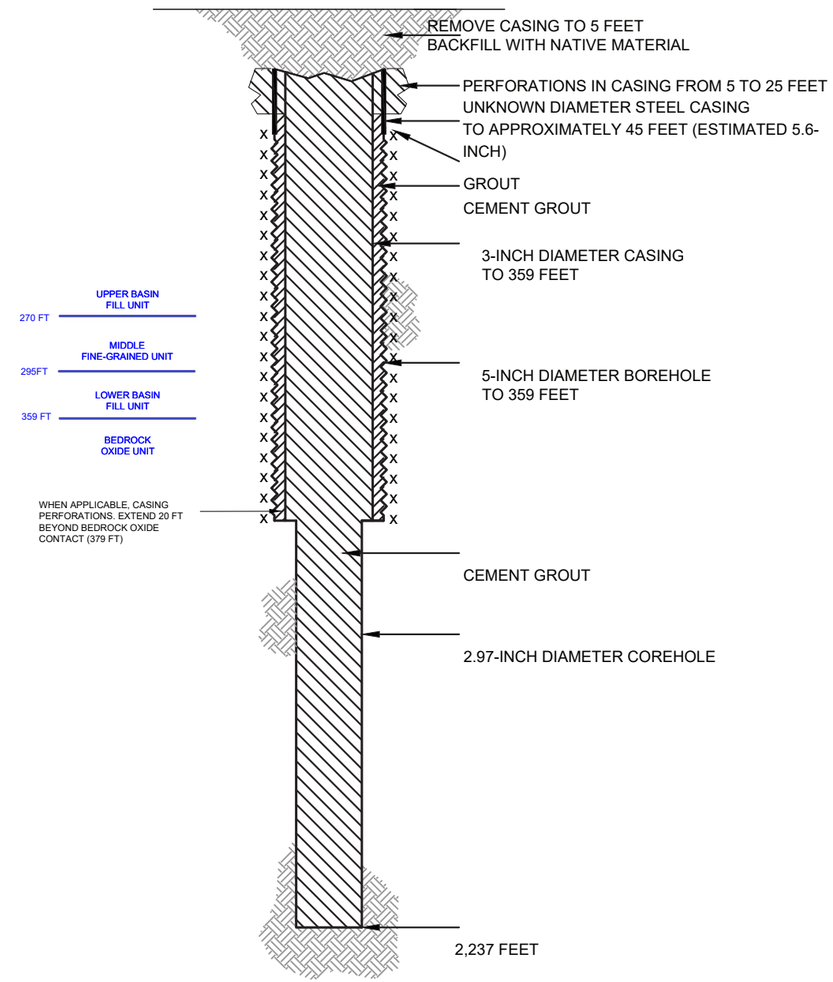
AS-BUILT COREHOLE 361S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 361S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 361S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		362

State	County
Arizona	Pinal

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

Latitude 33.05331797

Longitude -111.4289133

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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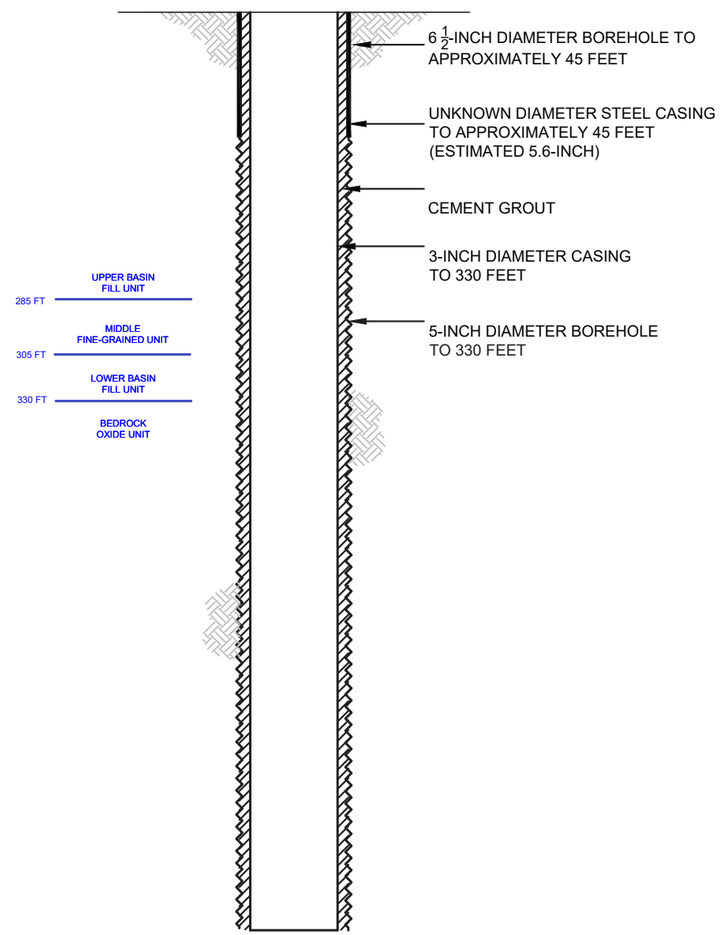
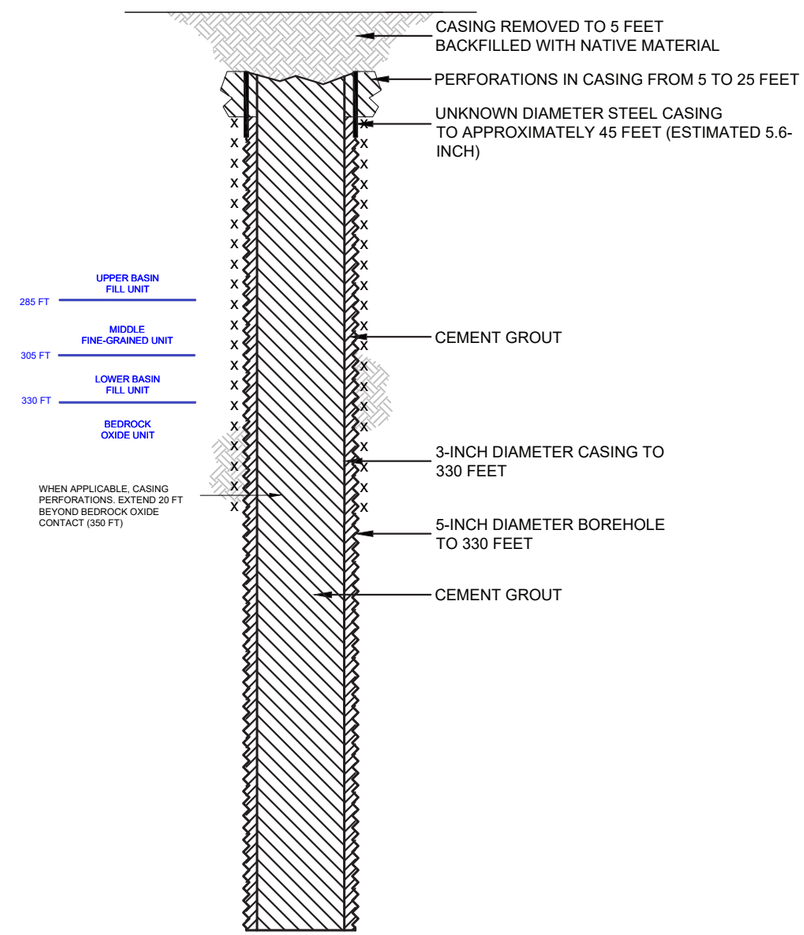
AS-BUILT COREHOLE 362



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 362



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 362 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		363

State	County
Arizona	Pinal

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

Latitude 33.05391144

Longitude -111.428502

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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Name and Official Title *(Please type or print)*	Signature	Date Signed
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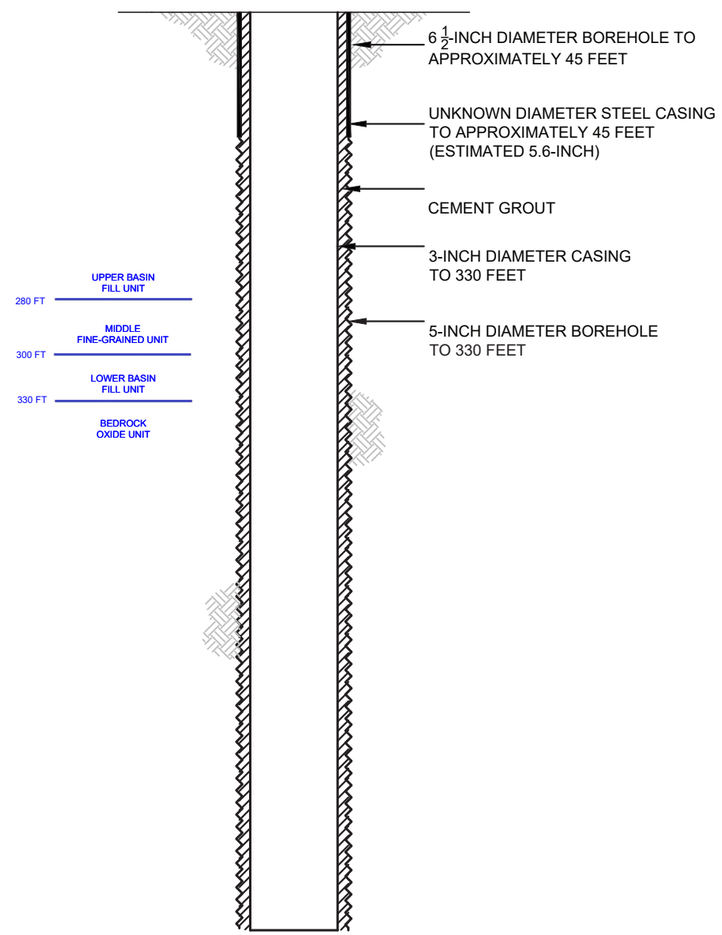
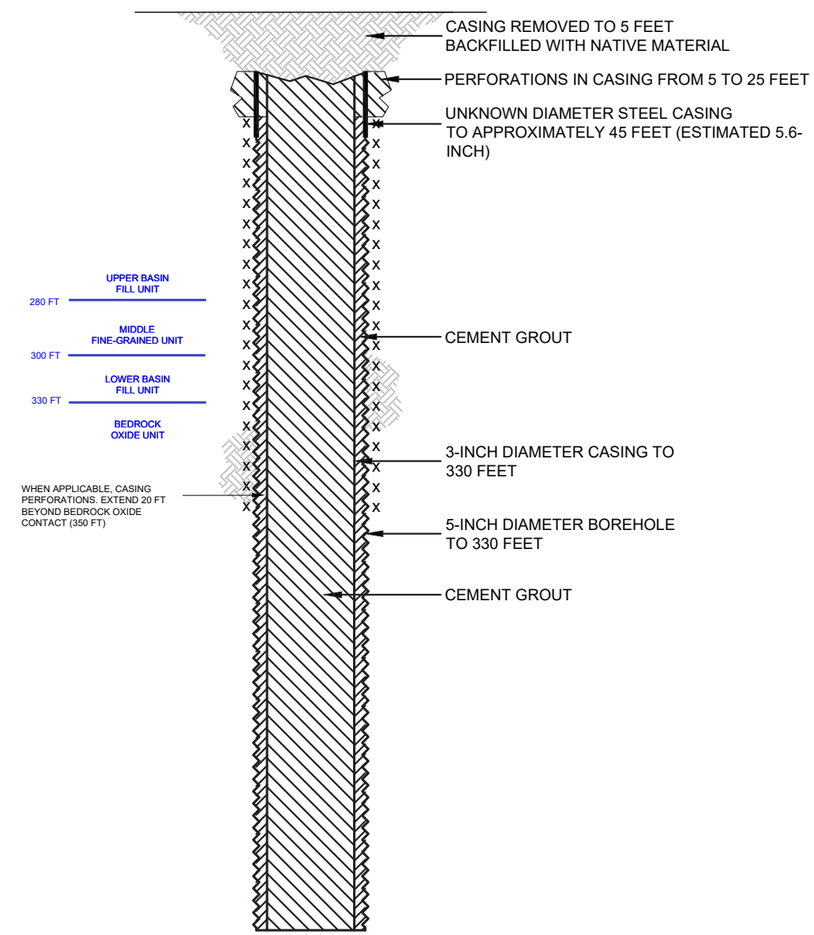
AS-BUILT COREHOLE 363



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 363



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 363 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		364

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Surface Location

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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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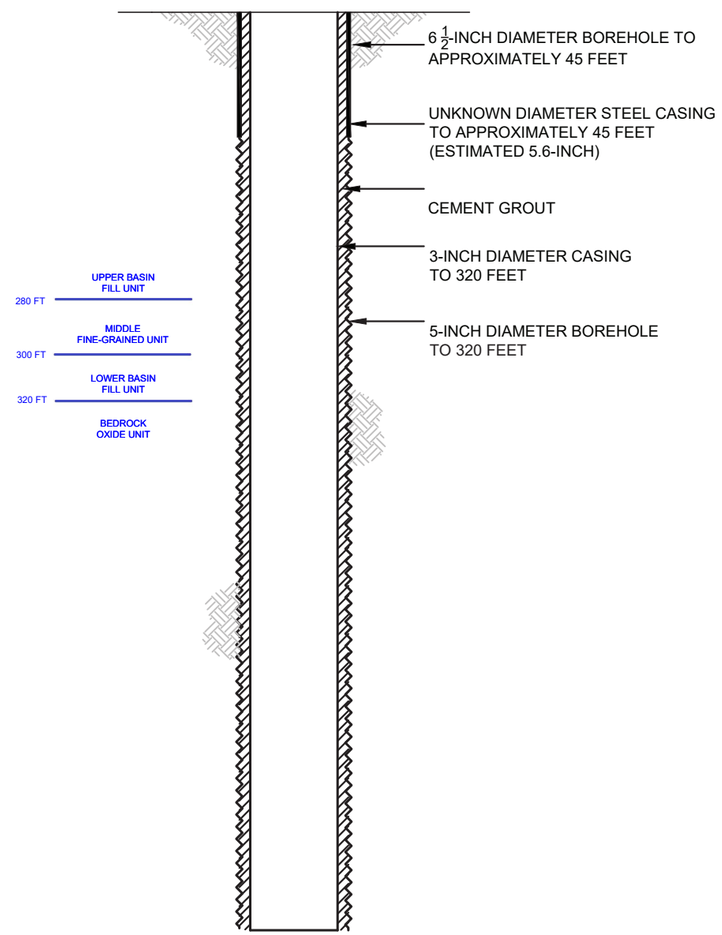
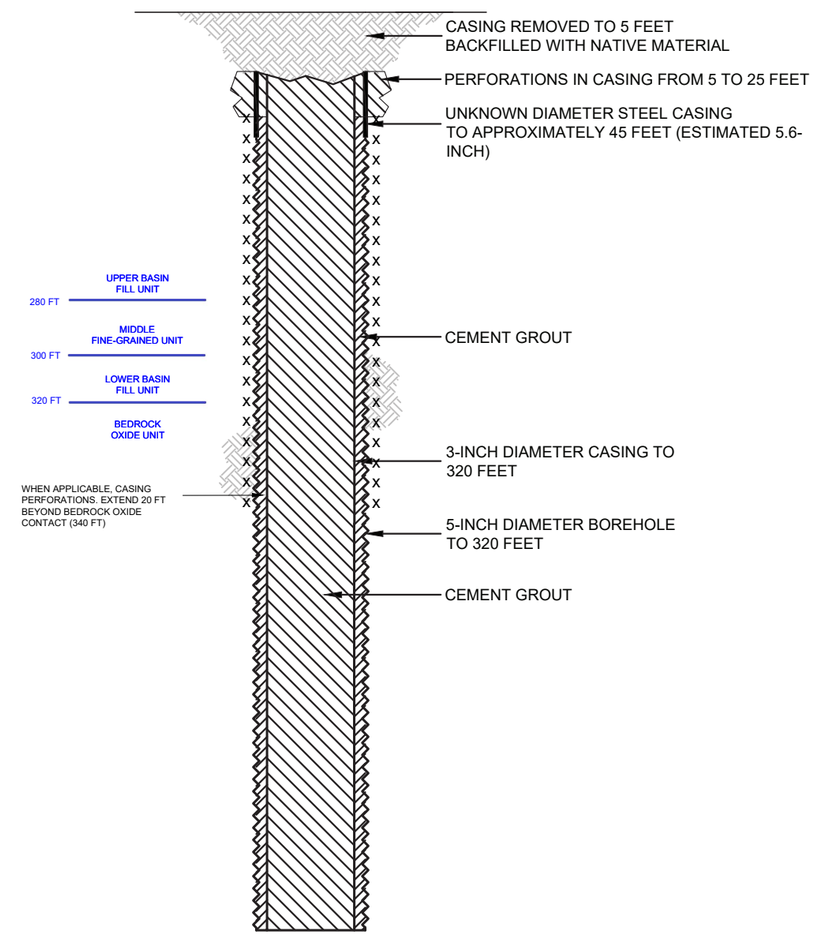
AS-BUILT COREHOLE 364



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 364



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 364 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		365S

State	County
Arizona	Pinal

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

Latitude 33.05152159

Longitude -111.4260675

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

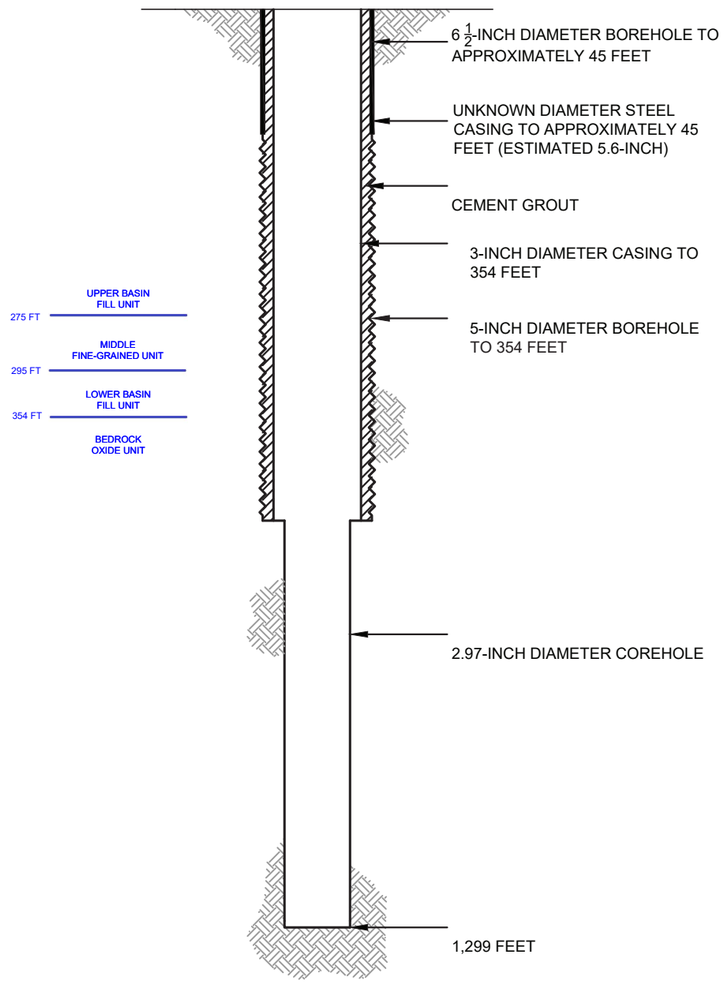
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

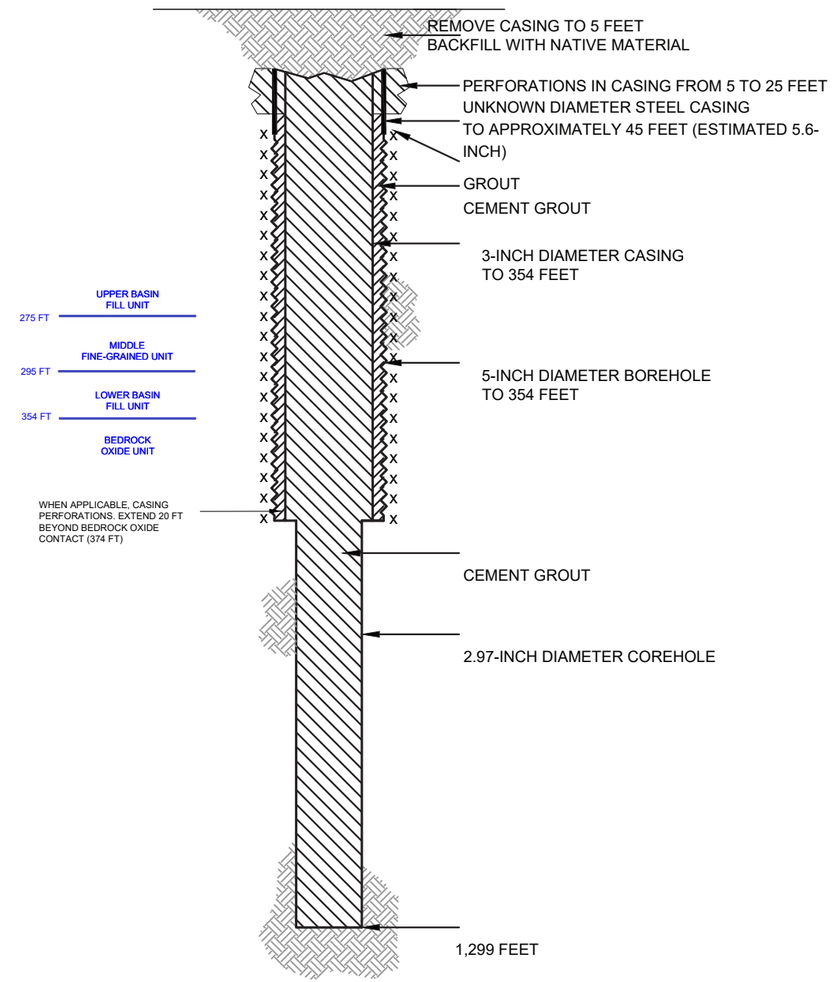
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 365S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 365S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 365S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		370S

State	County
Arizona	Pinal

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

Latitude 33.05034744

Surface Location

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

Longitude -111.4301535

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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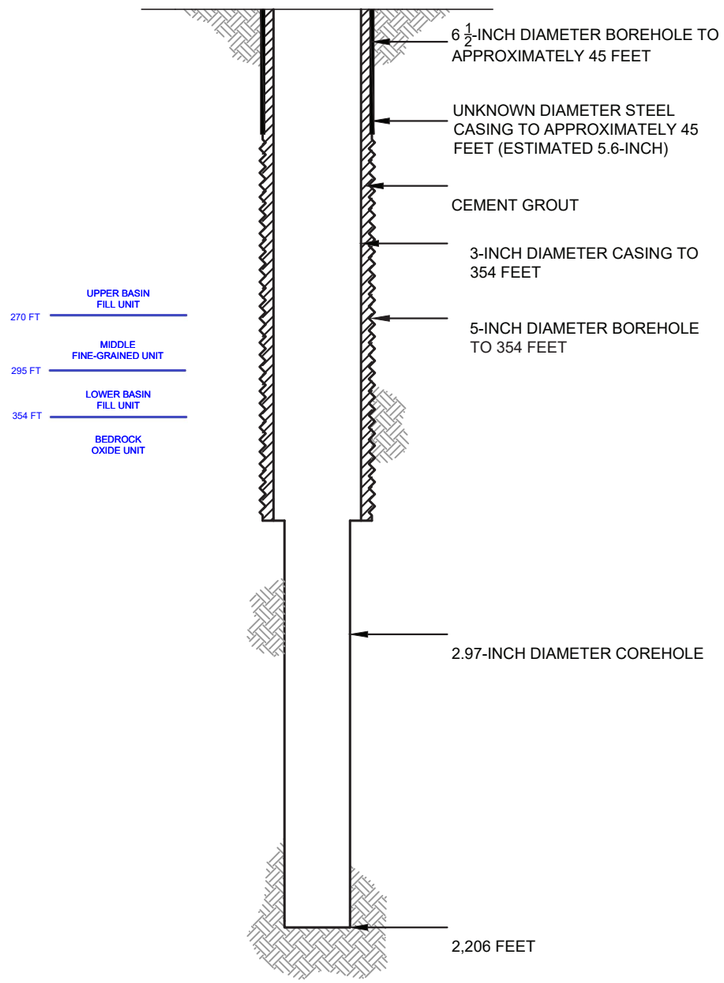
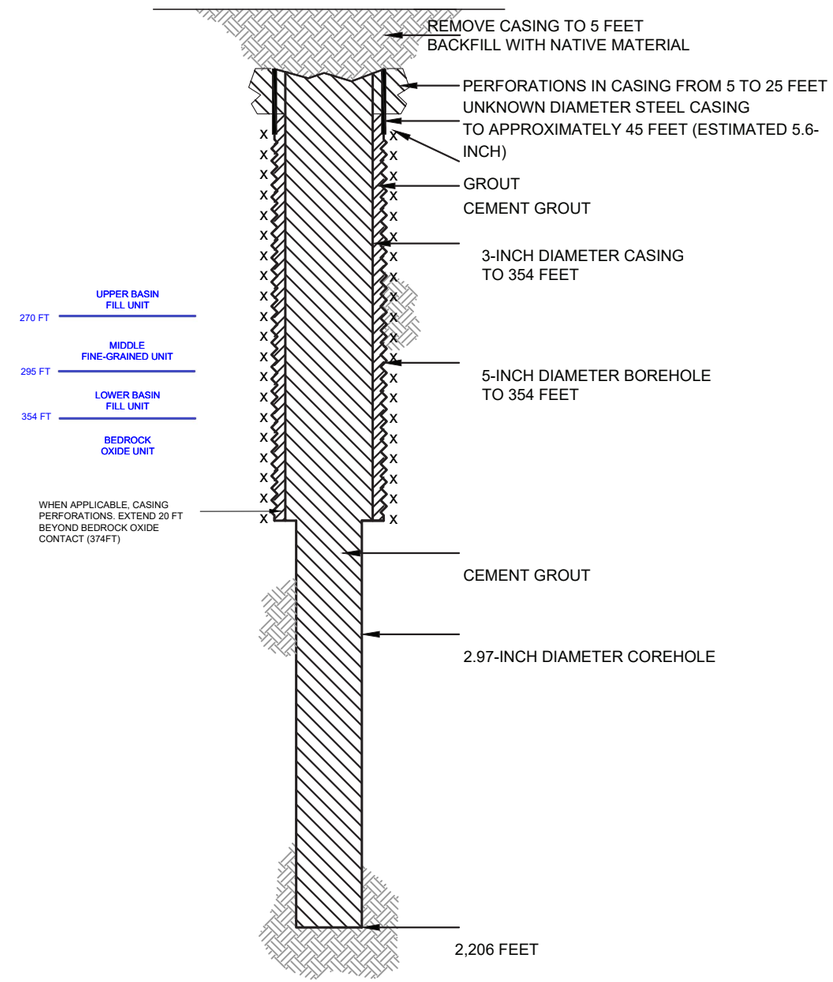
AS-BUILT COREHOLE 370S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 370S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 370S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		371S

State	County
Arizona	Pinal

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

Latitude 33.04975079

Longitude -111.4297488

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

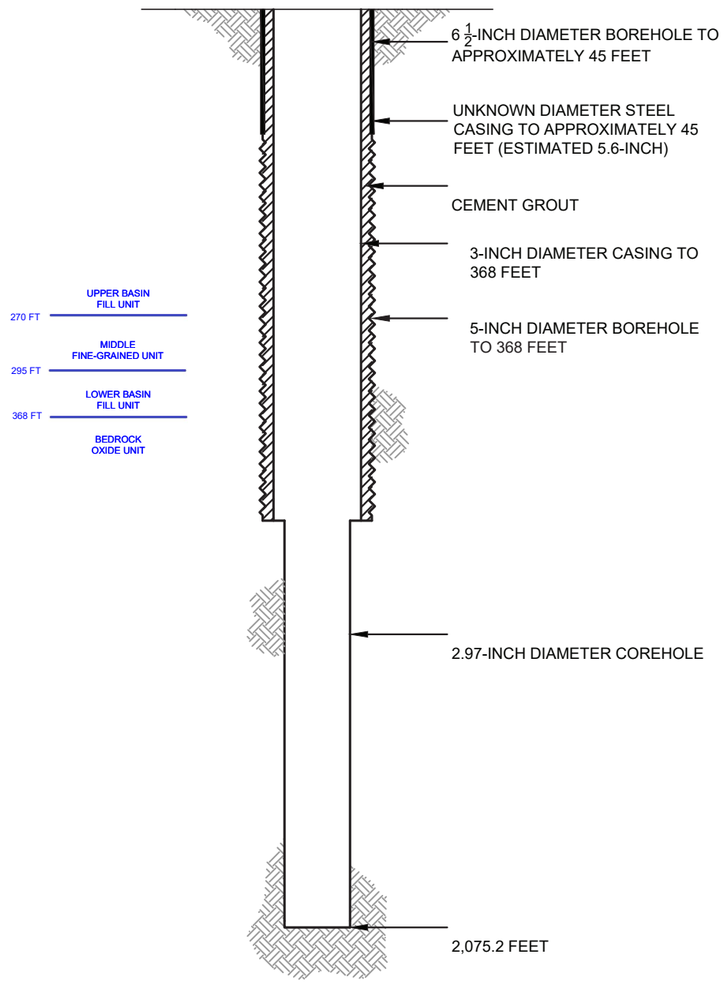
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

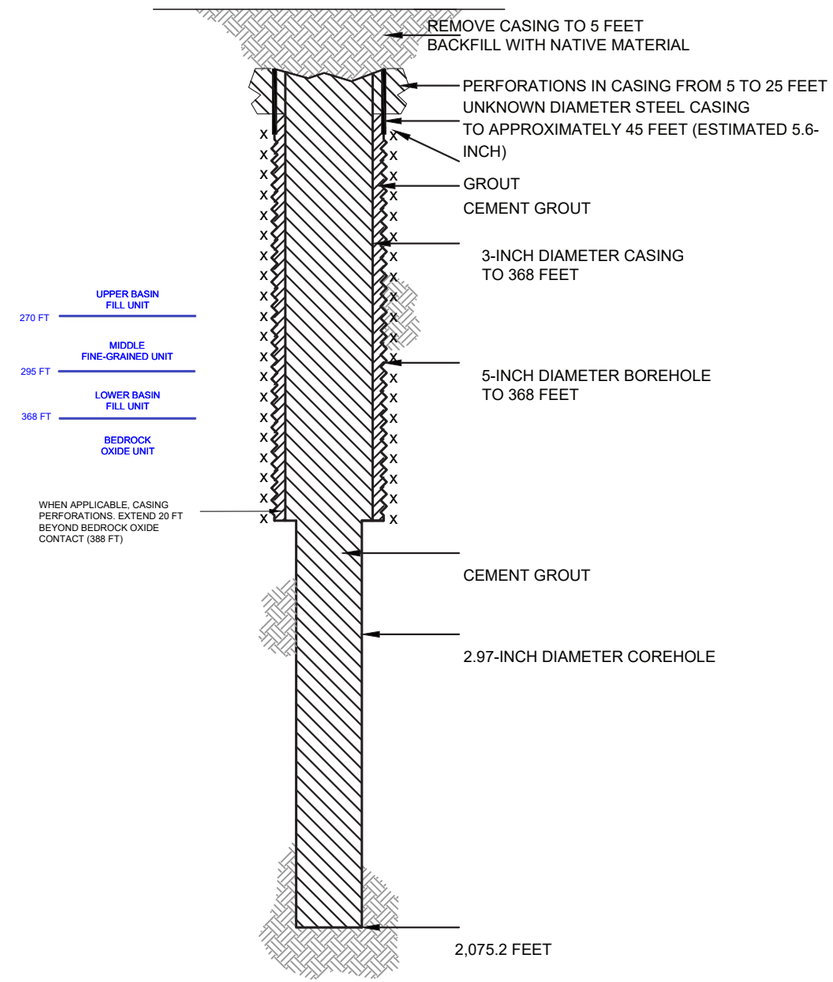
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 371S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 371S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 371S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		372S

State	County
Arizona	Pinal

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

Latitude 33.0504533

Longitude -111.4261619

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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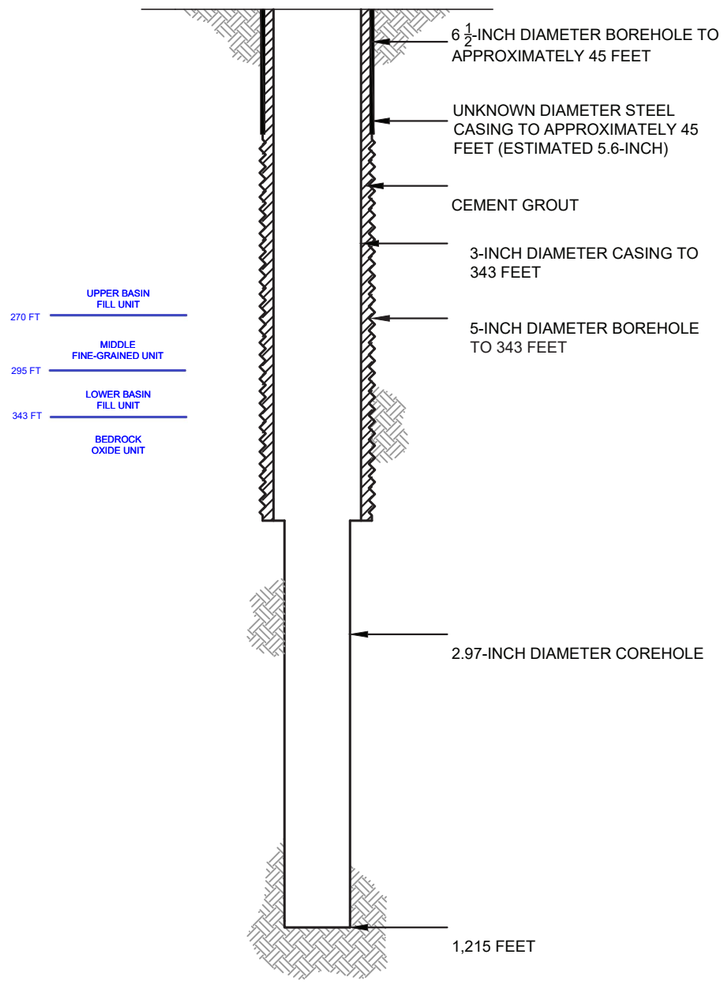
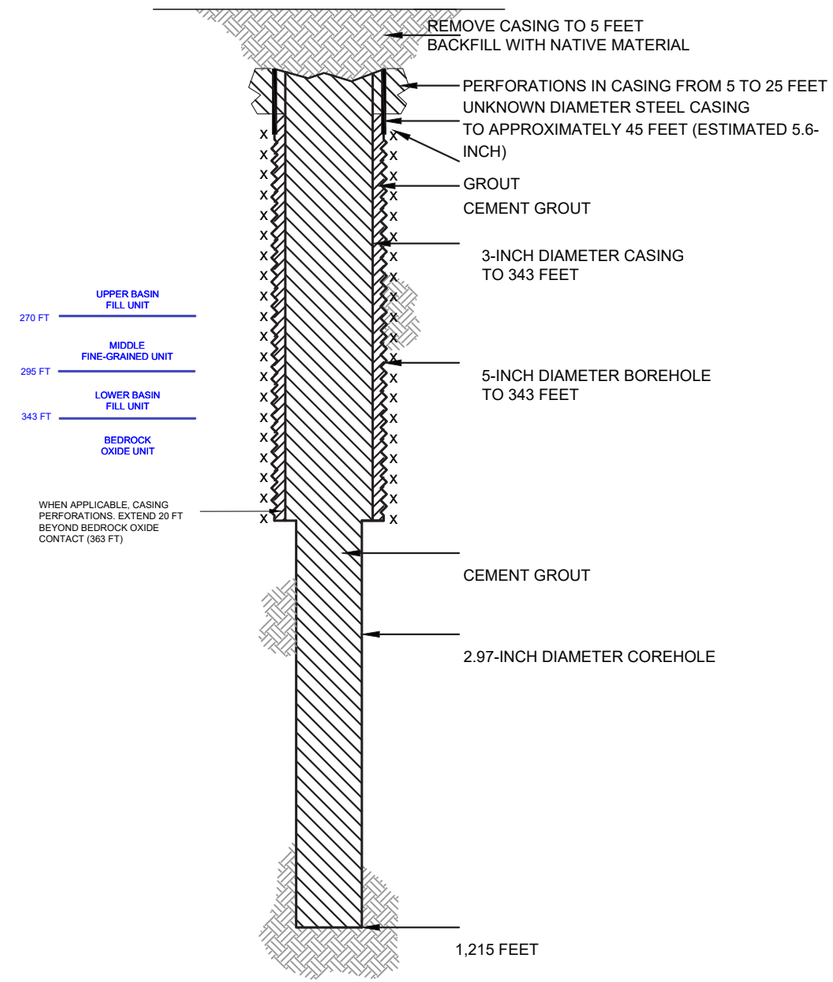
AS-BUILT COREHOLE 372S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 372S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 372S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		373MF

State	County
Arizona	Pinal

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

Latitude 33.04915094

Longitude -111.4285283

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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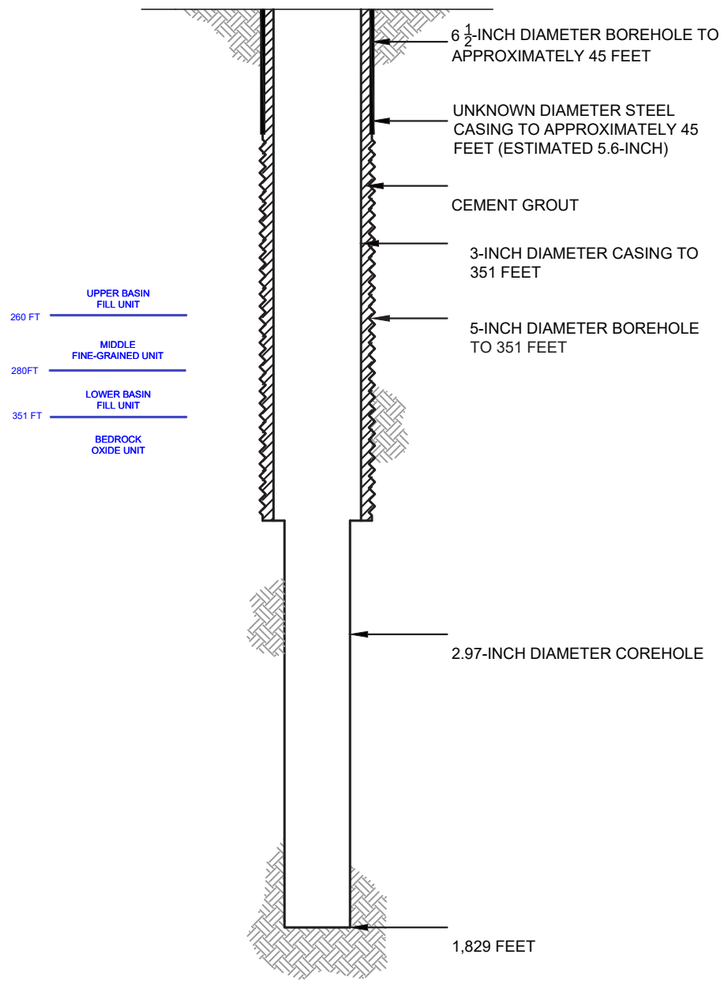
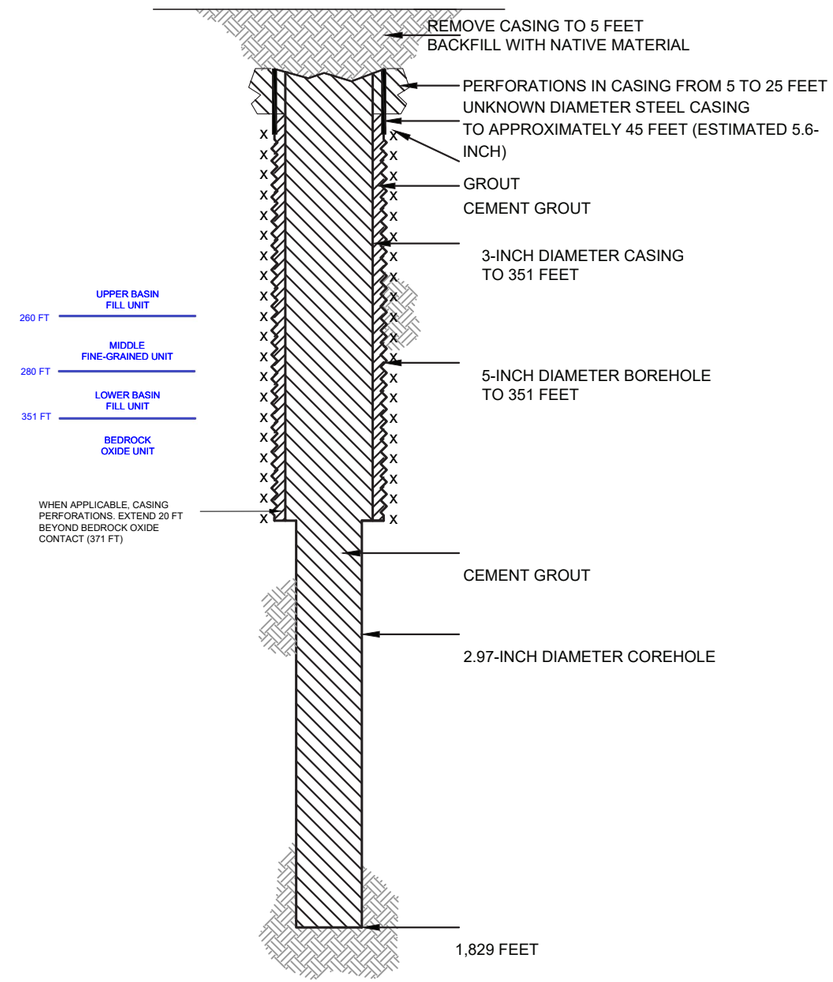
AS-BUILT COREHOLE 373MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 373MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 373MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		379MF

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.04675467

Longitude -111.4244622

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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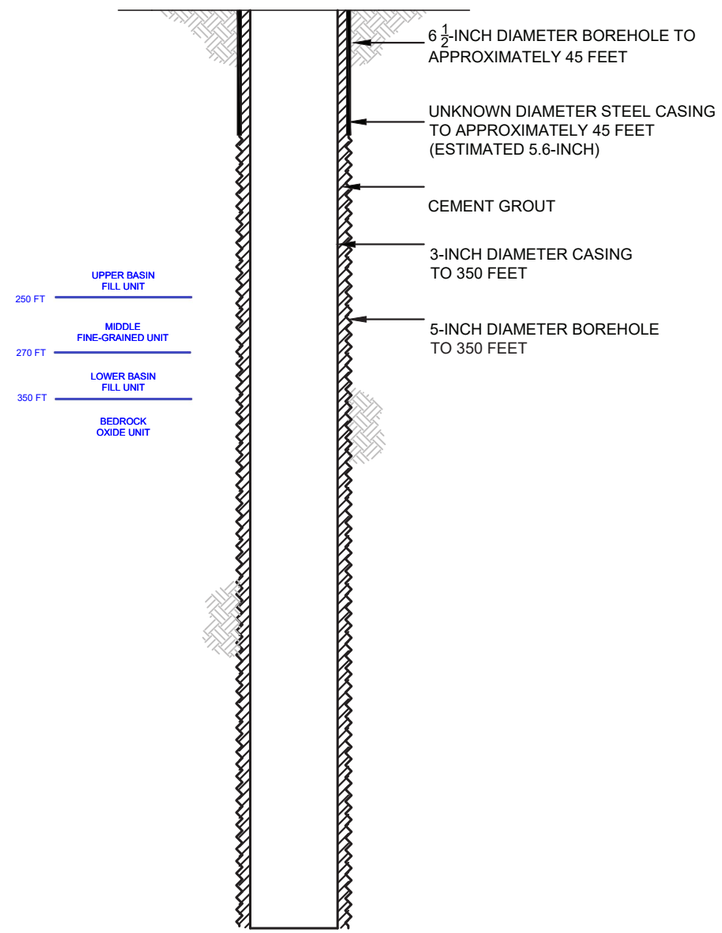
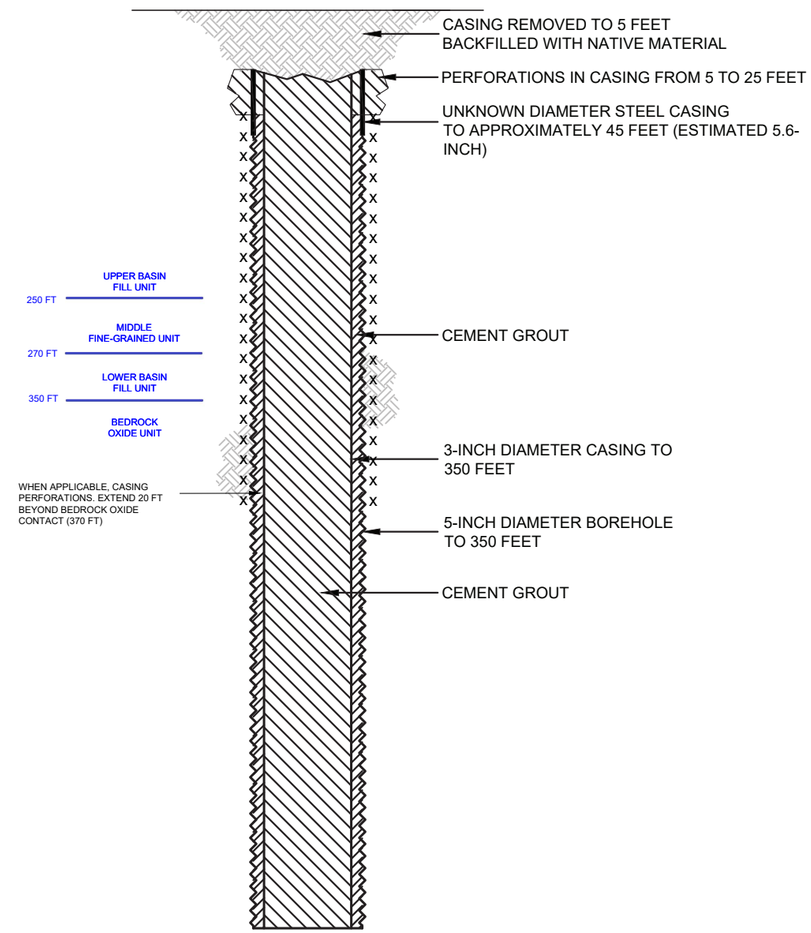
AS-BUILT COREHOLE 379MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 379MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 379MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		380MF

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.04675788

Longitude -111.4252781

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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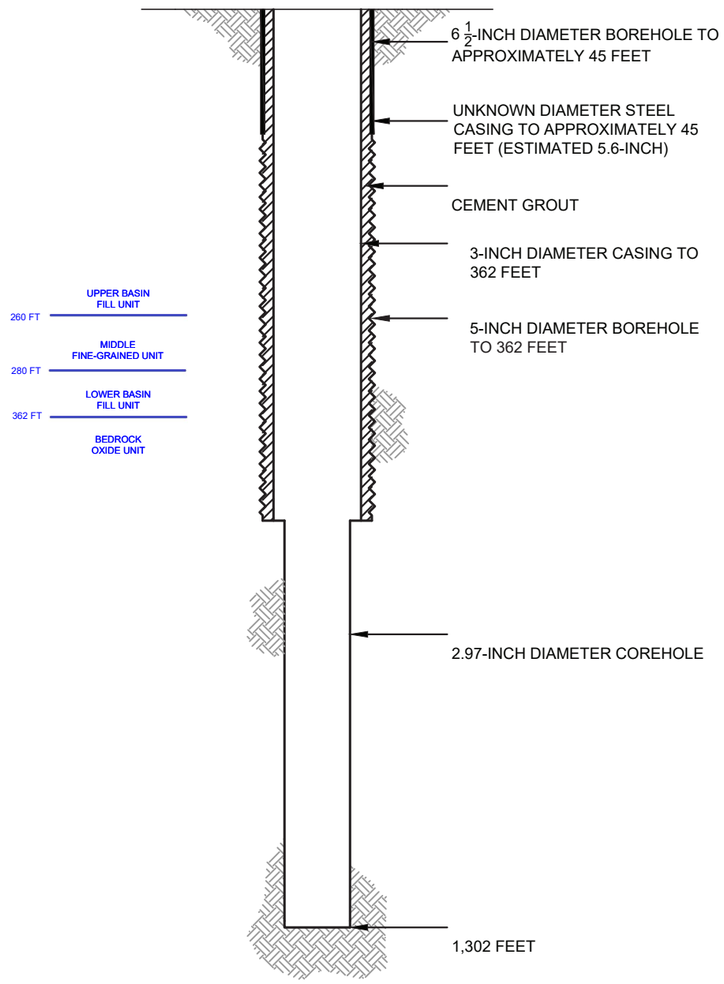
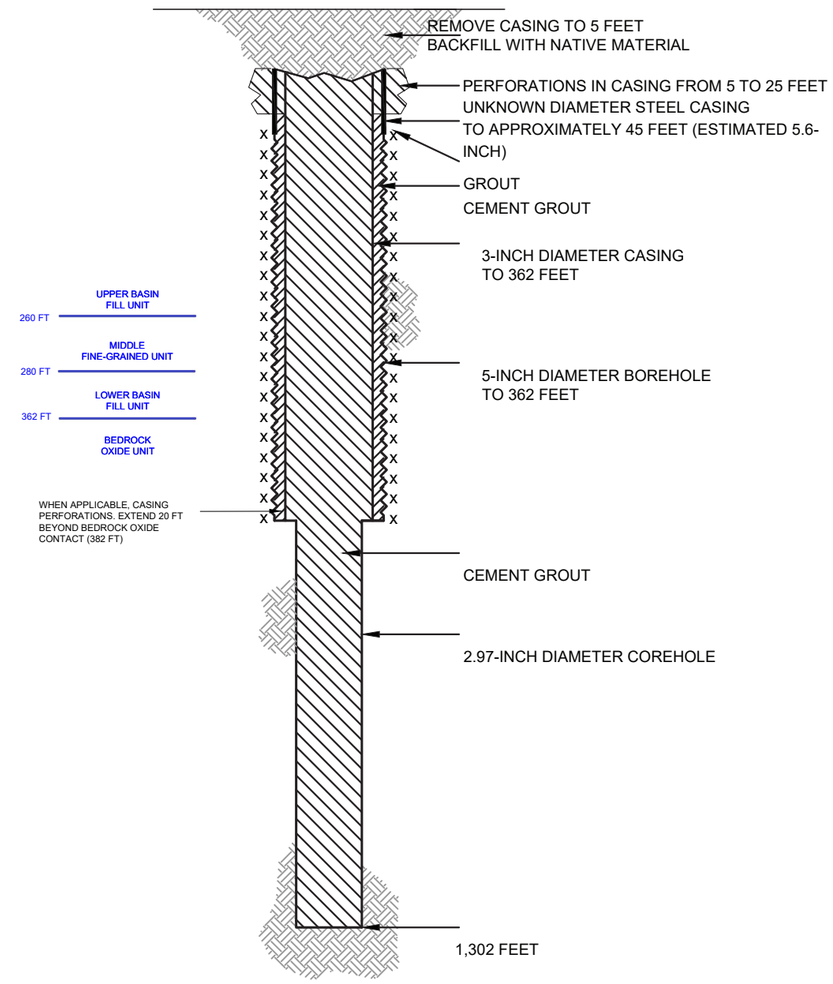
AS-BUILT COREHOLE 380MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 380MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 380MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

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Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		381MF

State	County
Arizona	Pinal

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

Latitude 33.04676109

Surface Location

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

Longitude -111.4260939

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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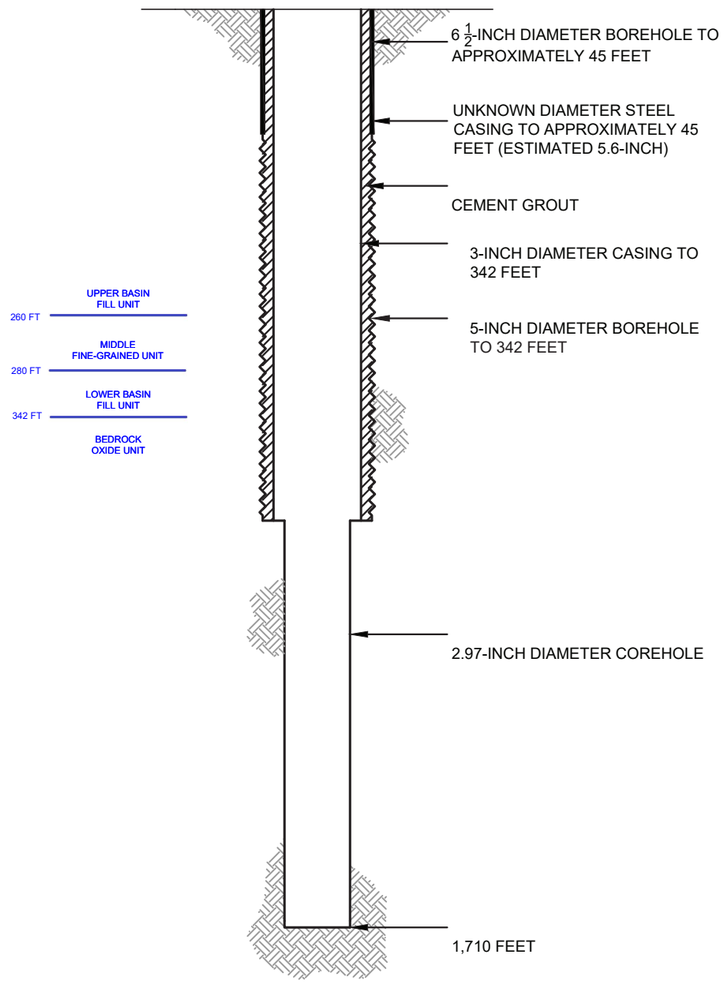
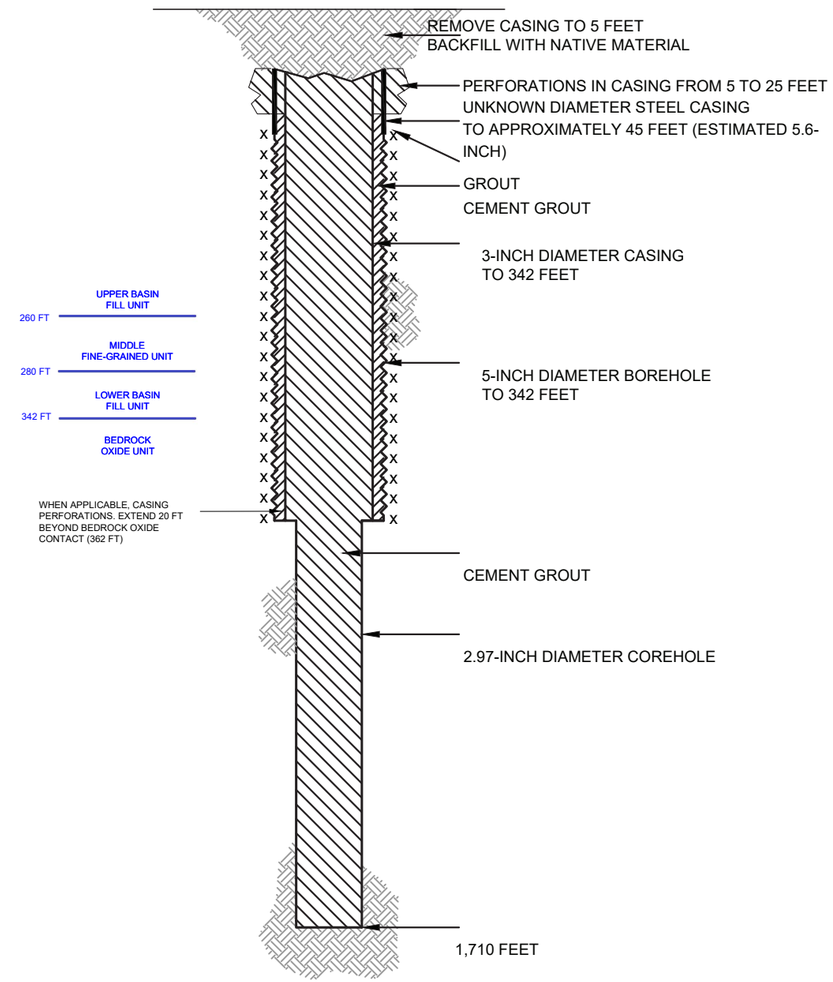
AS-BUILT COREHOLE 381MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 381MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 381MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		382MF

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.0467643

Longitude -111.4269098

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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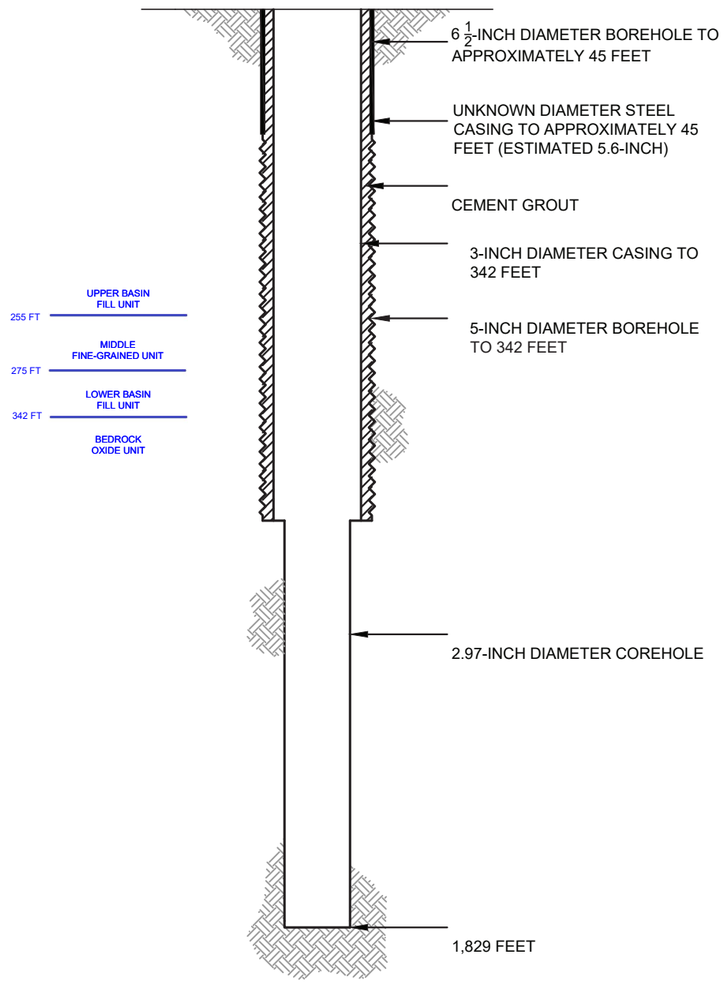
For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

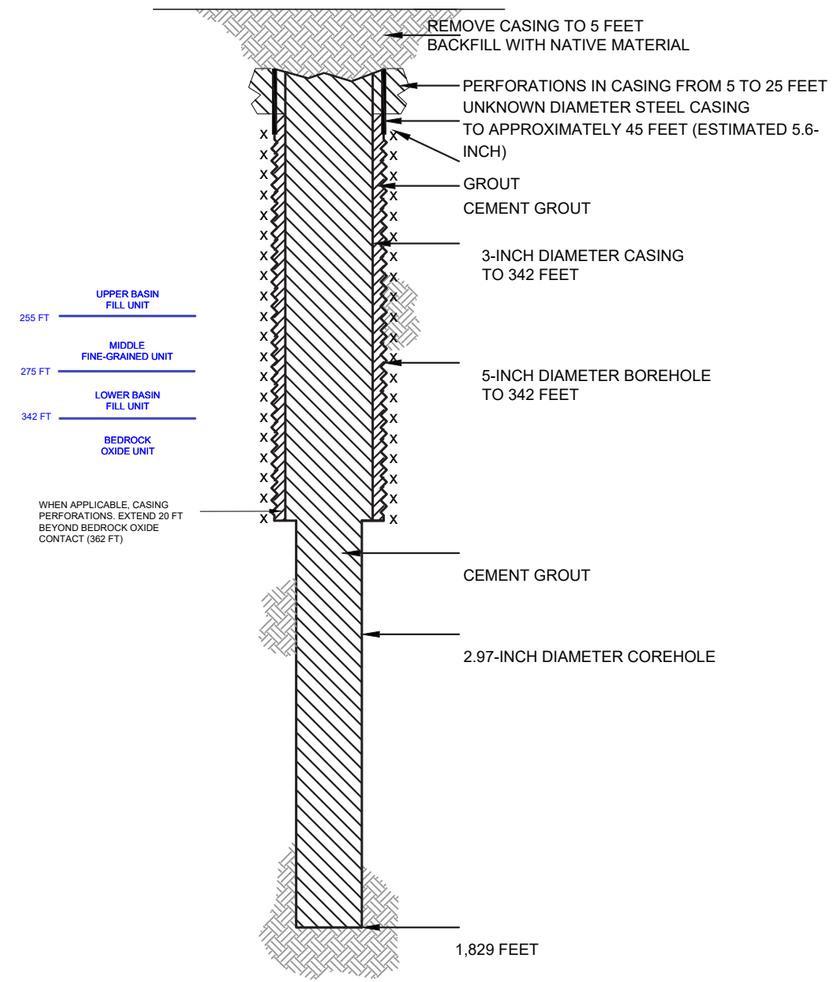
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 382MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 382MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 382MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

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OMB No. 2040-0042 Approval Expires 4/30/2022

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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		383MF

State	County
Arizona	Pinal

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

Latitude 33.04795122

Longitude -111.4260873

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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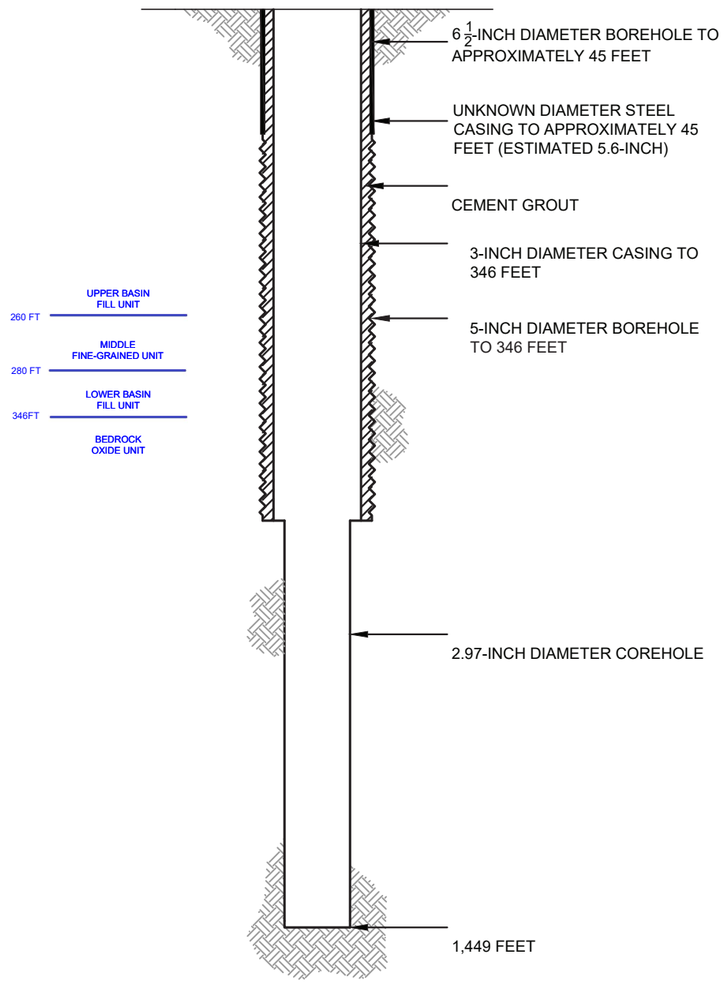

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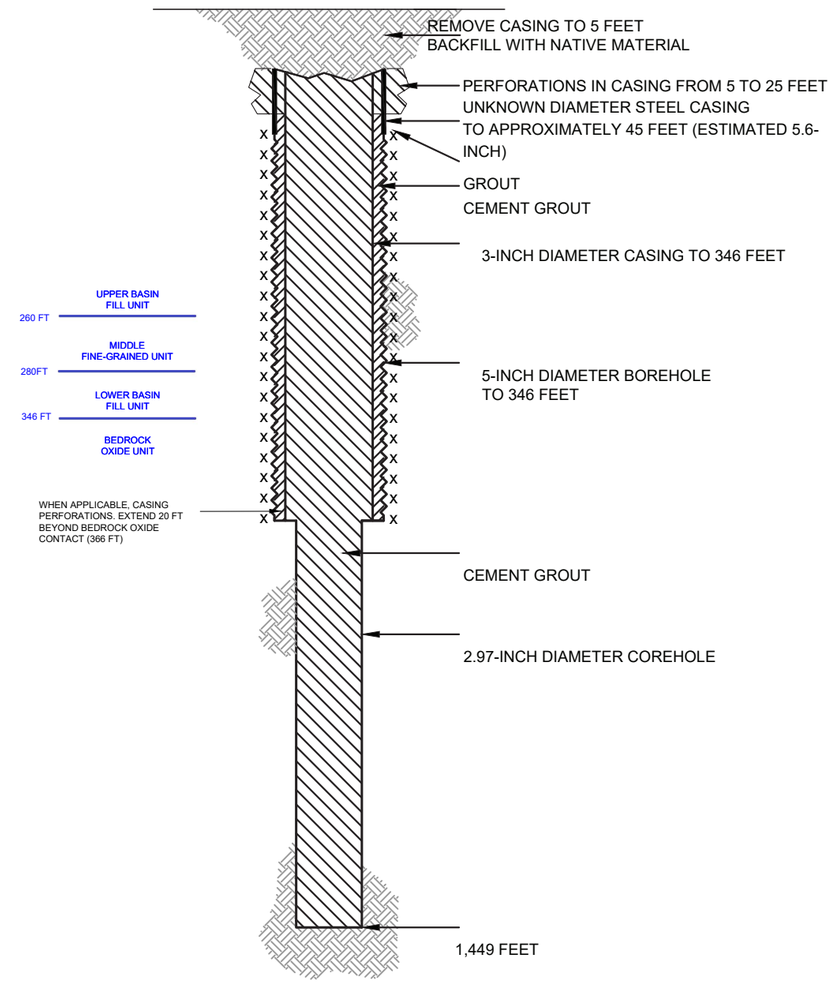

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FIGURE 1

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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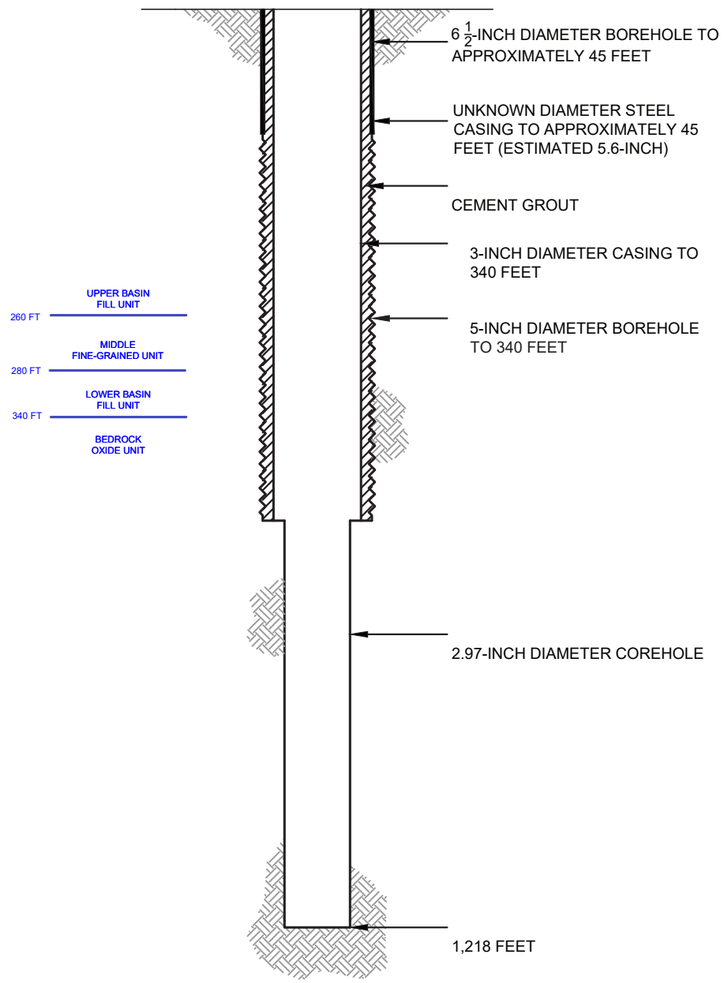
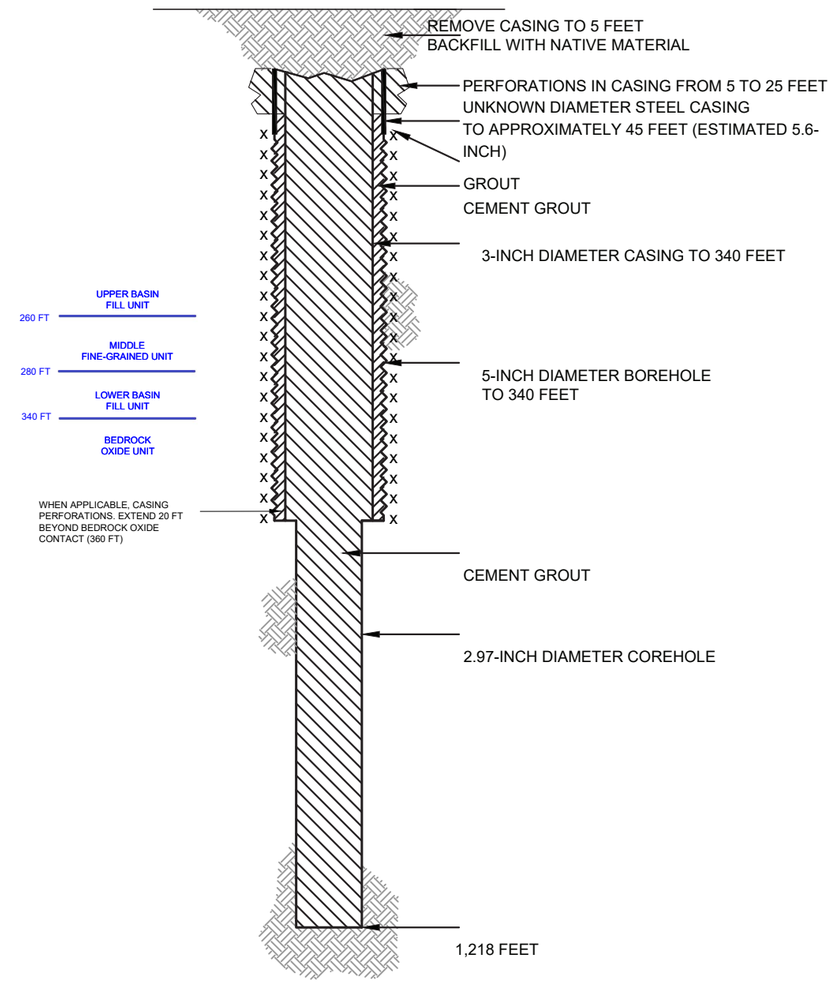
AS-BUILT COREHOLE 384MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 384MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 384MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		385MF

State	County
Arizona	Pinal

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

Latitude 33.04794479

Longitude -111.4244556

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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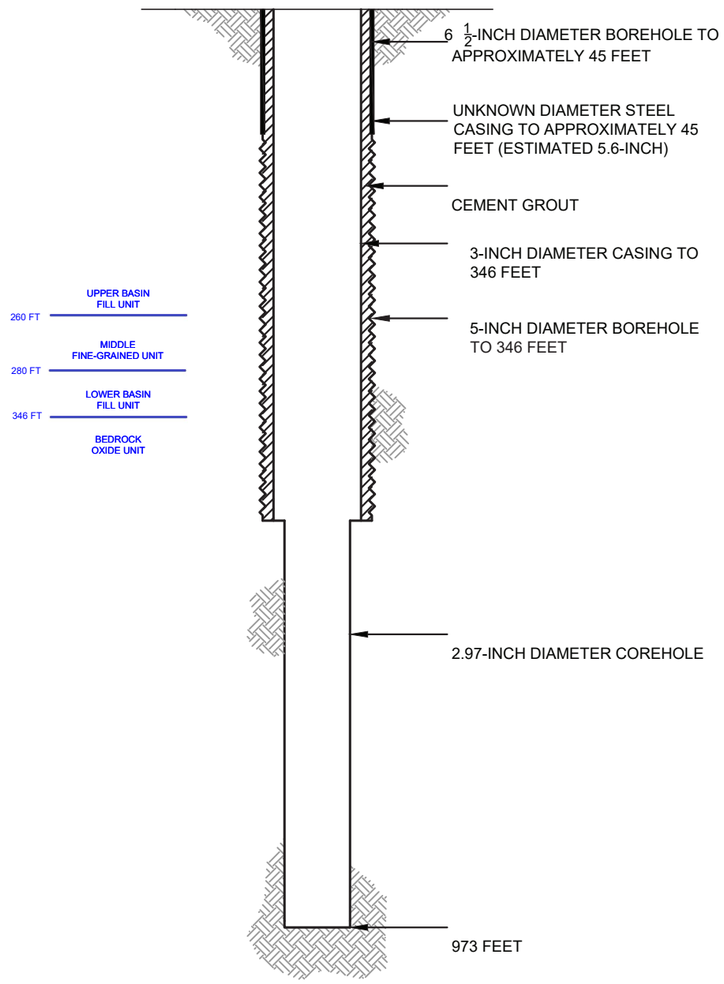
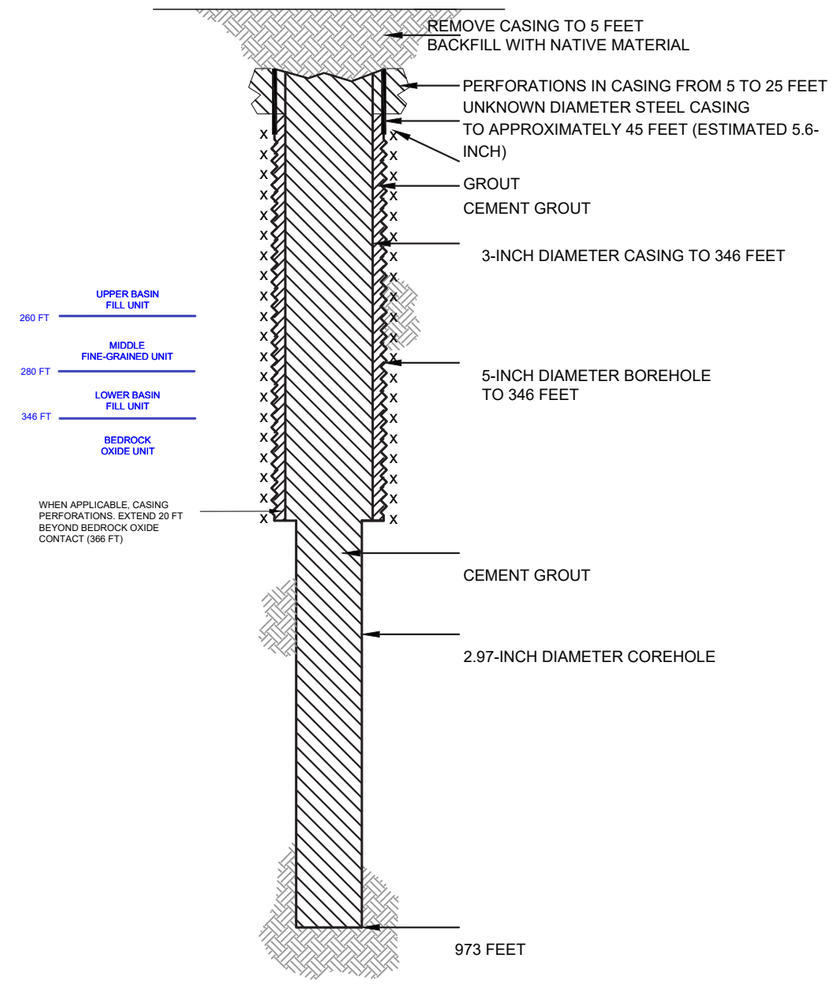


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 385MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 385MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		387MF

State	County
Arizona	Pinal

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

Latitude 33.04853824

Longitude -111.4240443

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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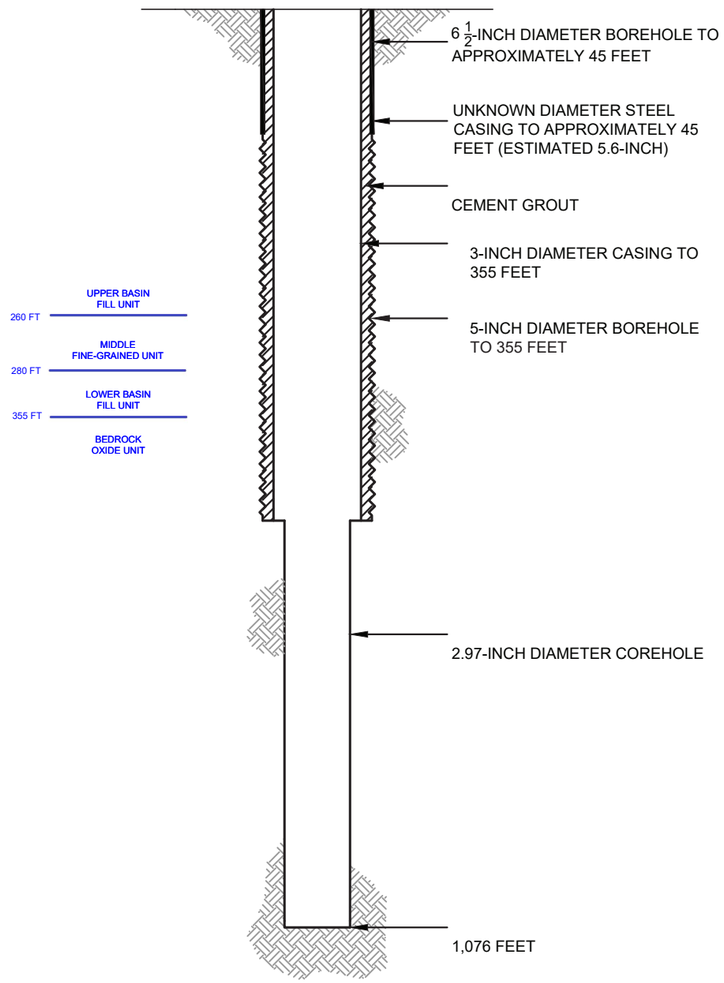

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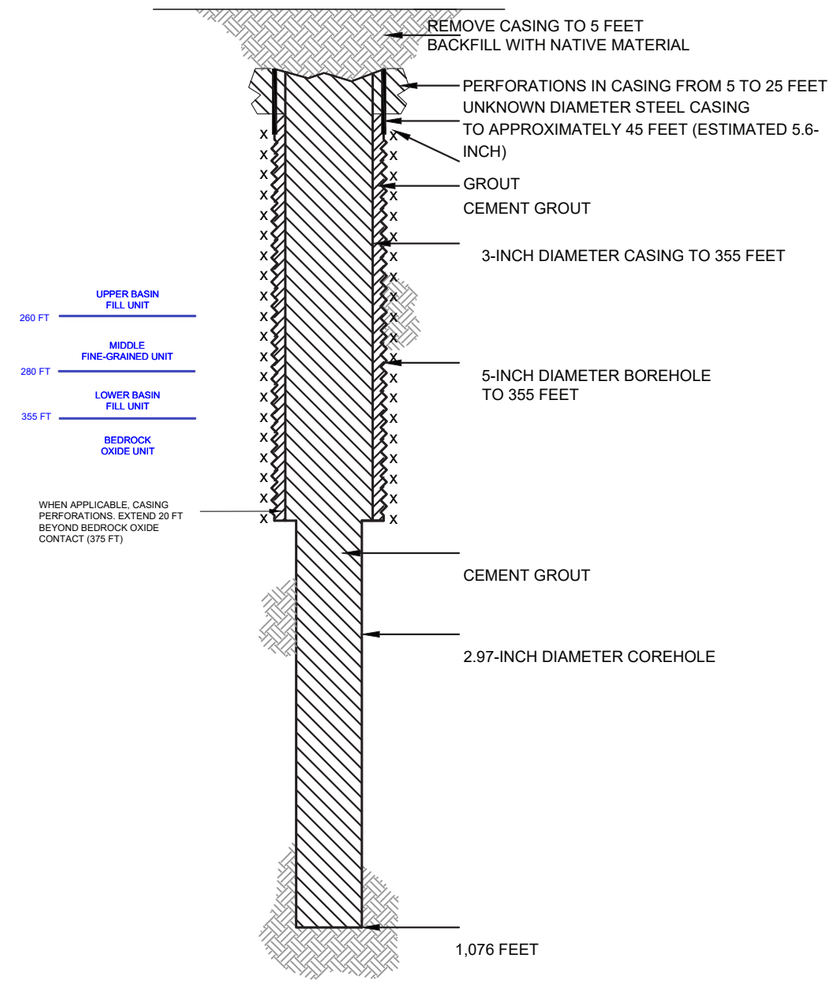

HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 387MF DIAGRAM

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NOT TO SCALE
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TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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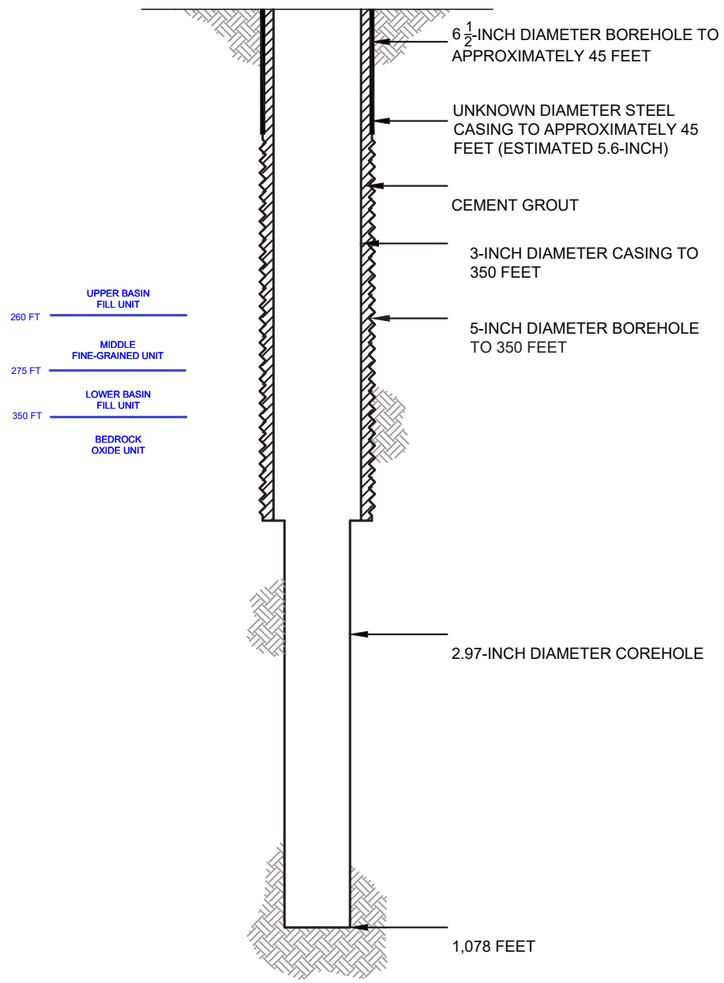
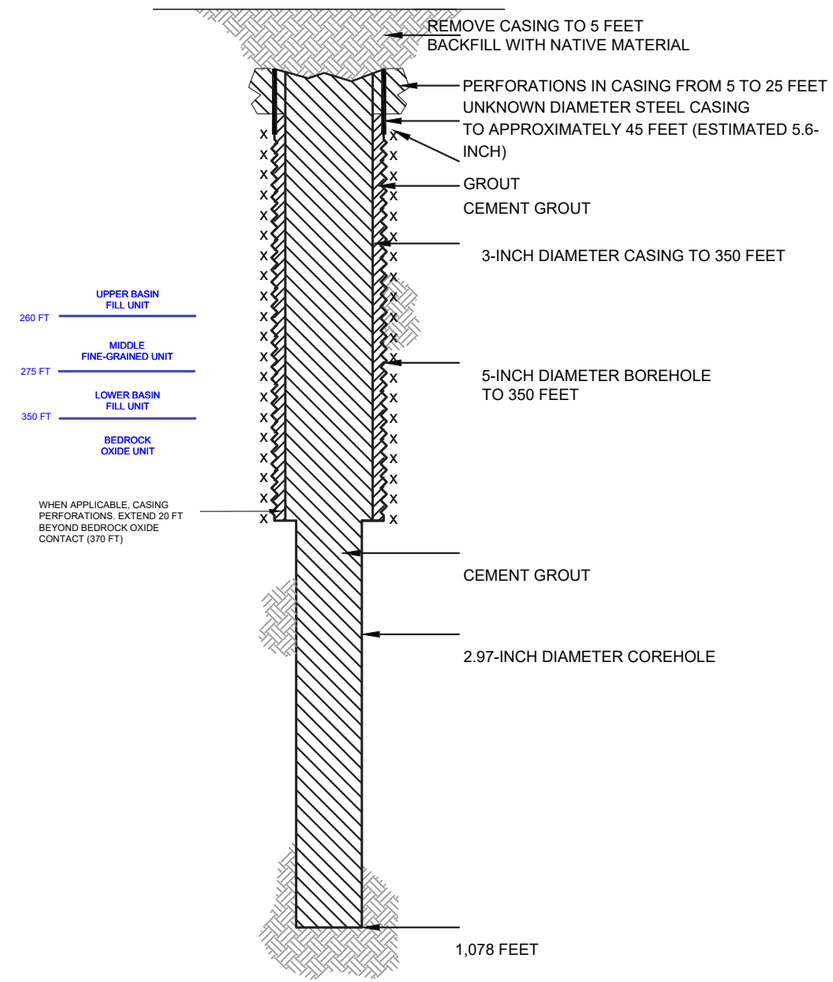
AS-BUILT COREHOLE 388MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 388MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 388MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		394MF

State	County
Arizona	Pinal

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

Latitude 33.04616443

Longitude -111.4256893

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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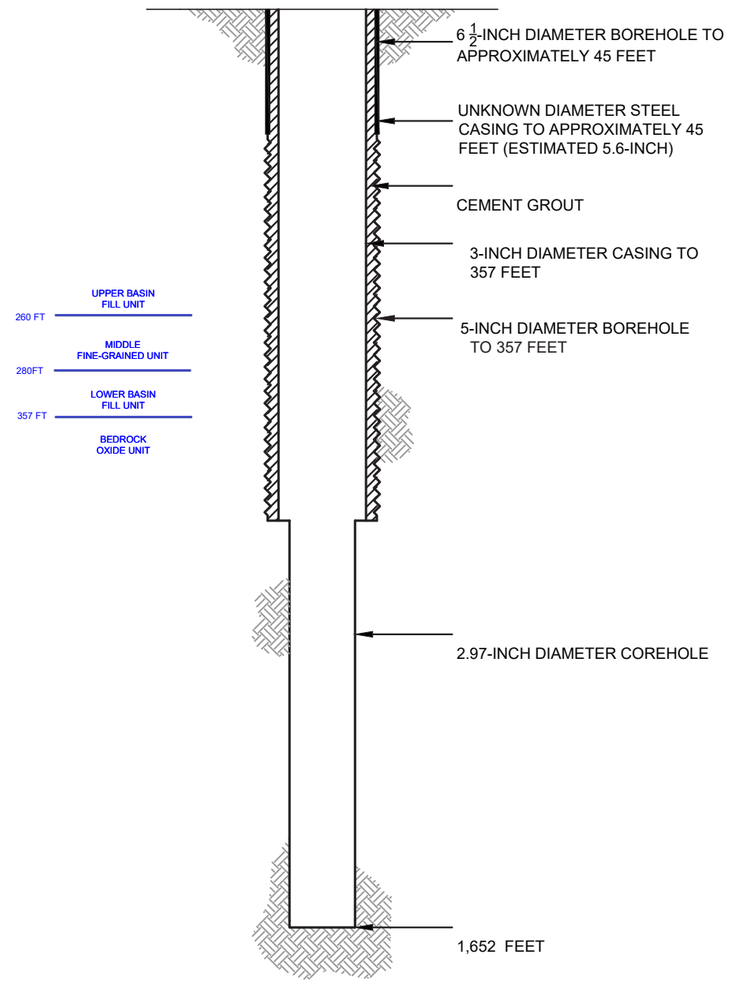
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

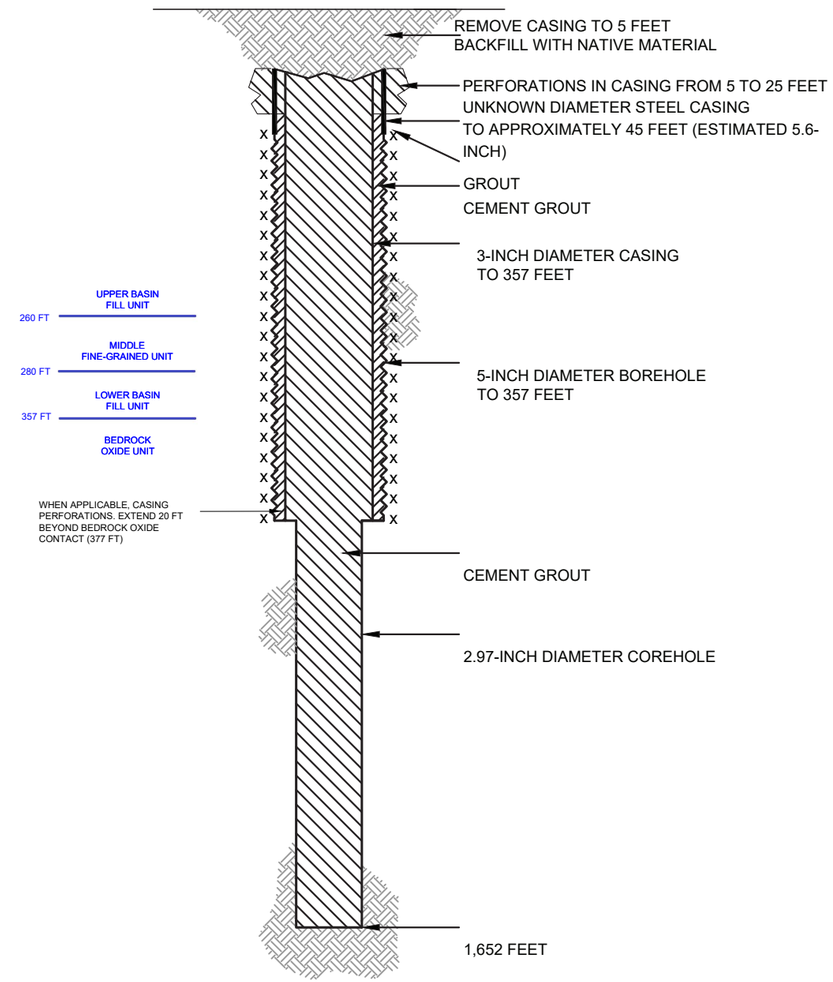
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 394MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 394MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 394MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		395MF

State	County
Arizona	Pinal

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

Latitude 33.04735134

Longitude -111.4248668

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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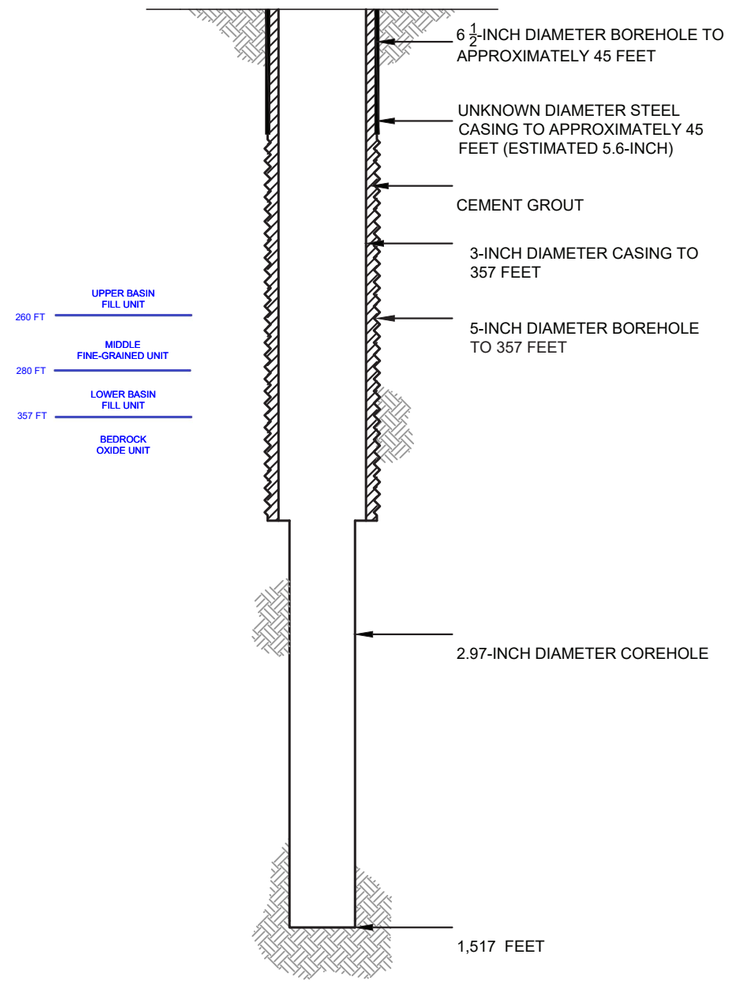
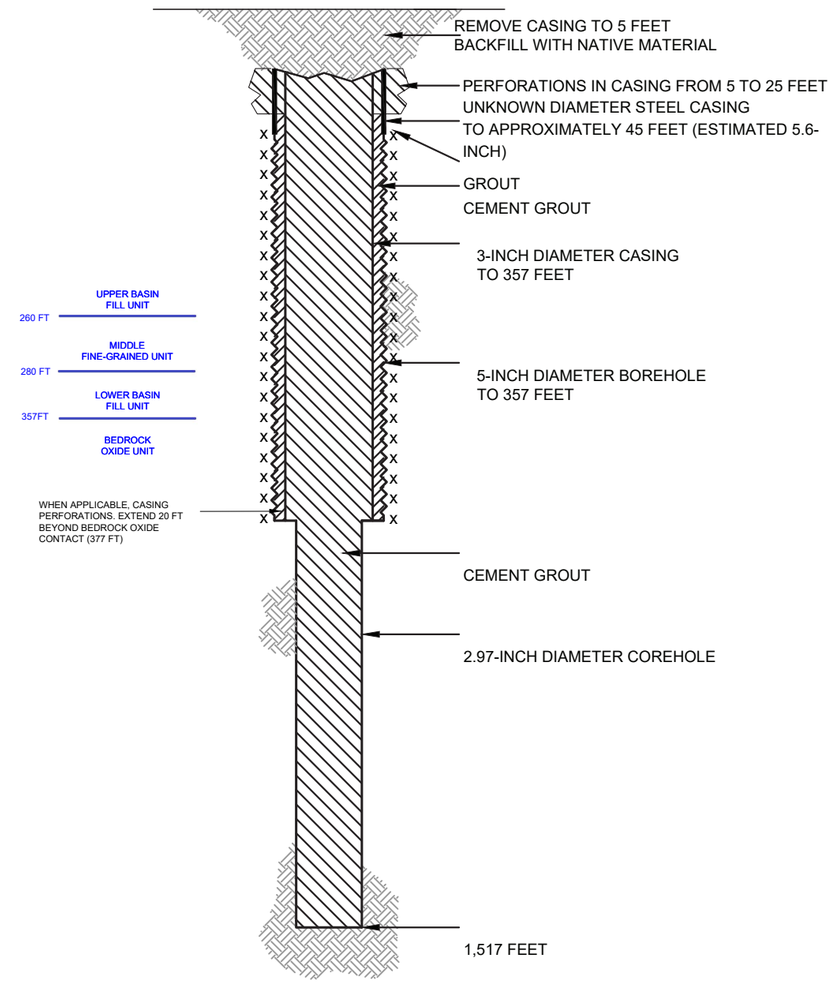
AS-BUILT COREHOLE 395MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 395MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 395MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		396MF

State	County
Arizona	Pinal

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

Latitude 33.04899104

Longitude -111.422818

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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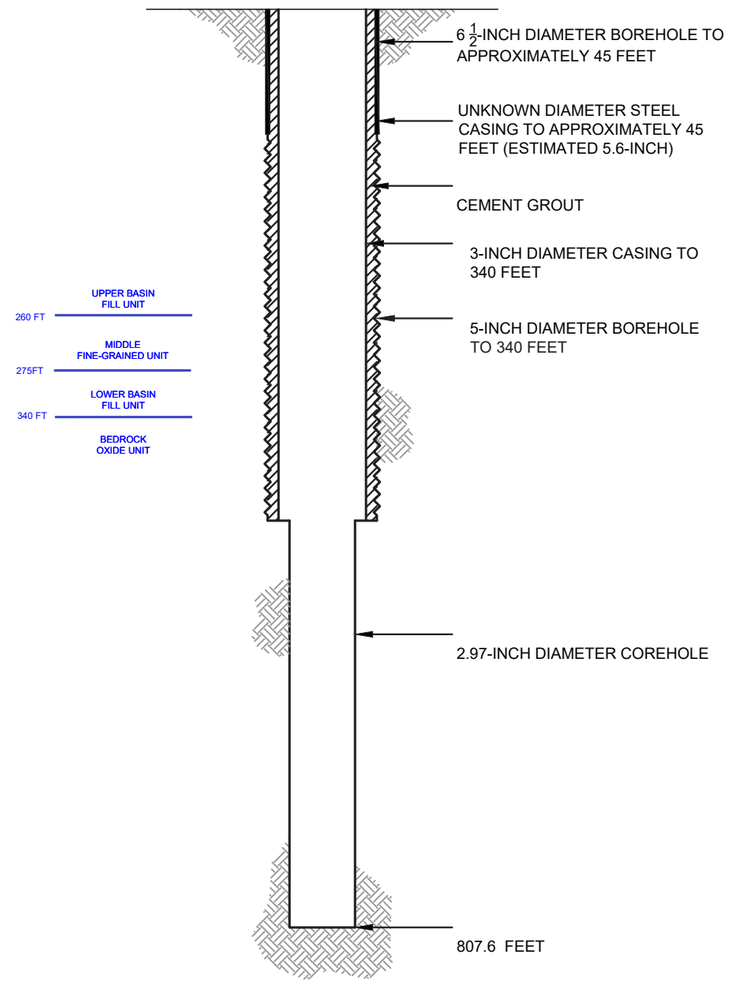
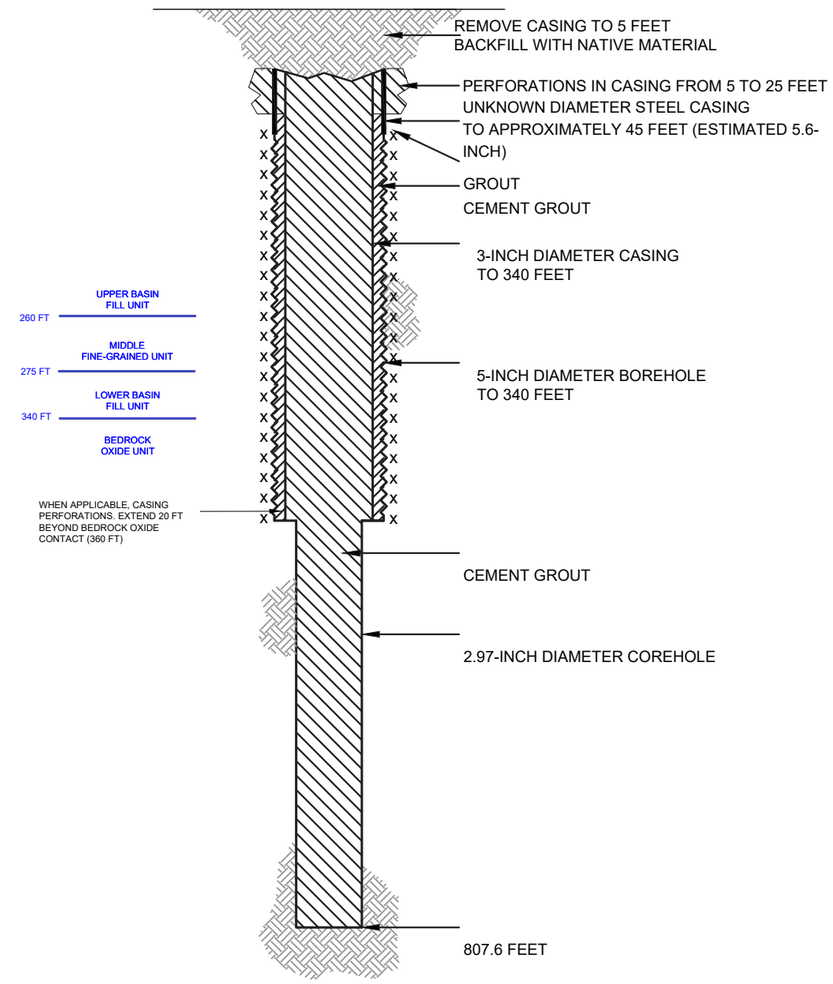
AS-BUILT COREHOLE 396MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 396MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 396MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA
Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		398MF

State	County
Arizona	Pinal

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

Latitude 33.04855748

Longitude -111.4289395

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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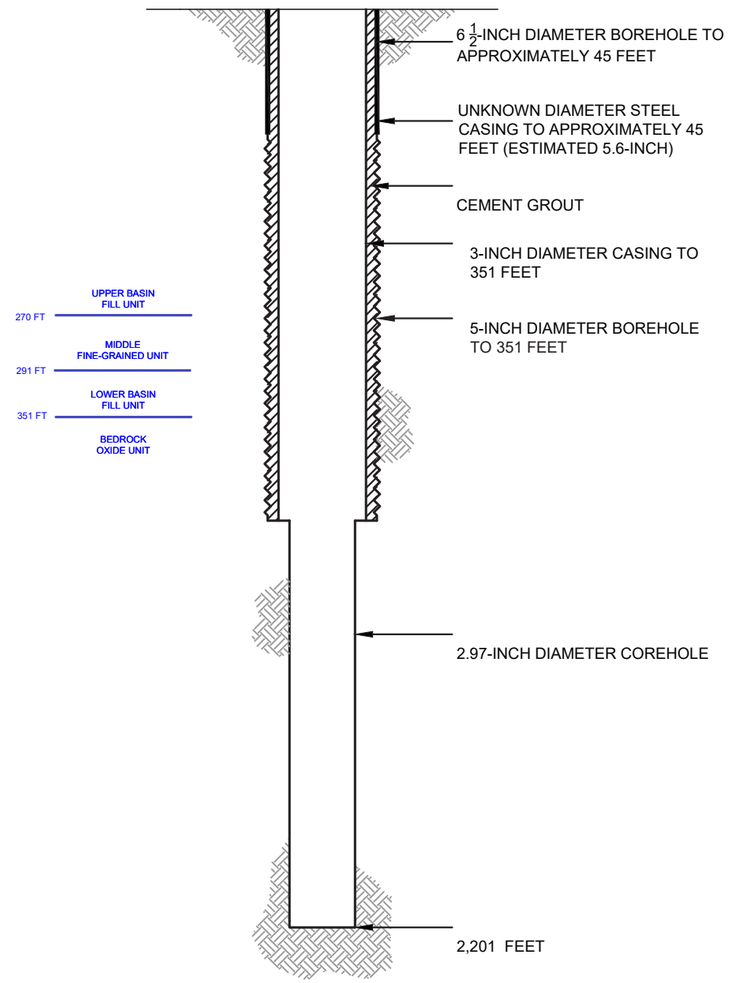
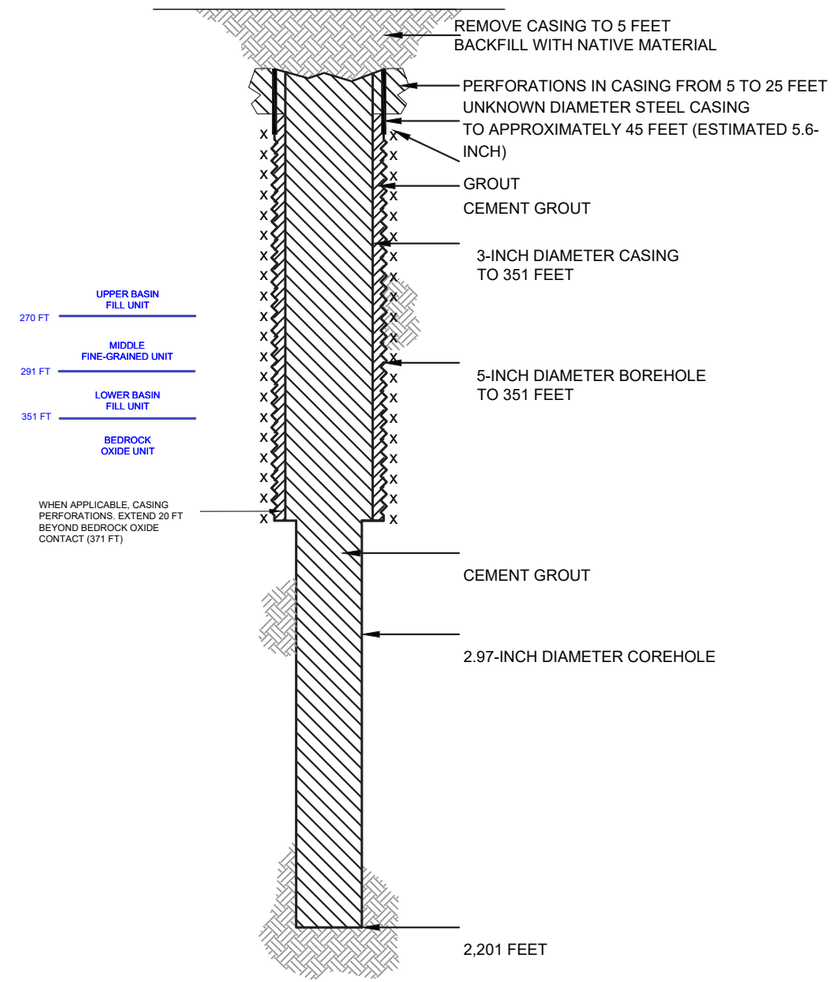
AS-BUILT COREHOLE 398MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 398MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 398MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		400MF

State	County
Arizona	Pinal

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

Latitude 33.04901671

Longitude -111.4293449

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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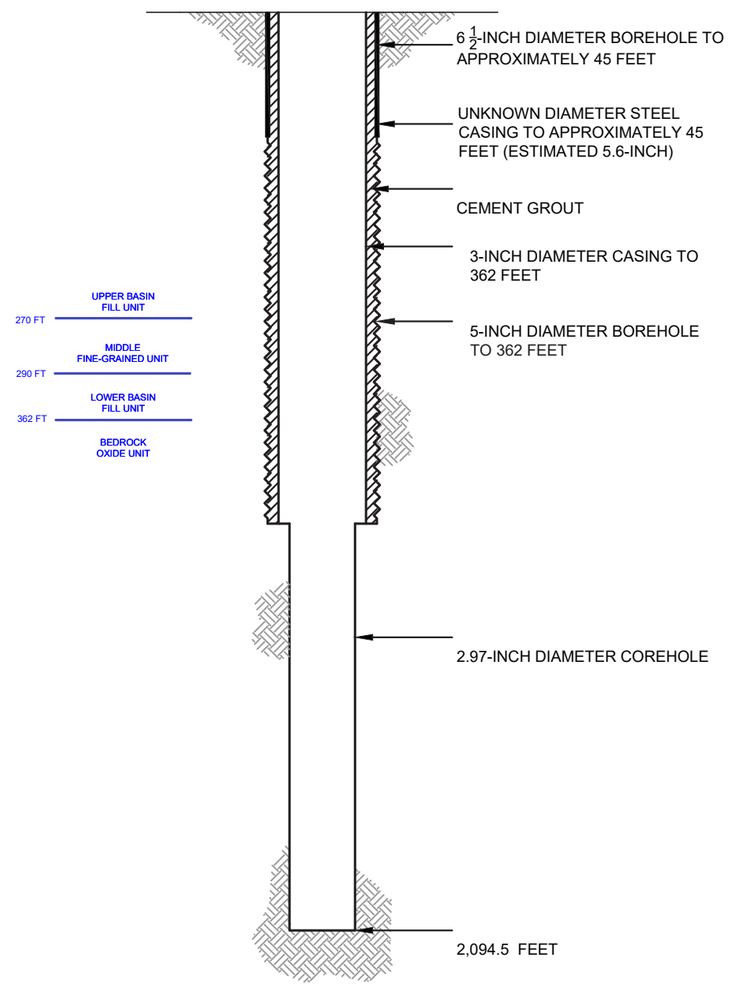
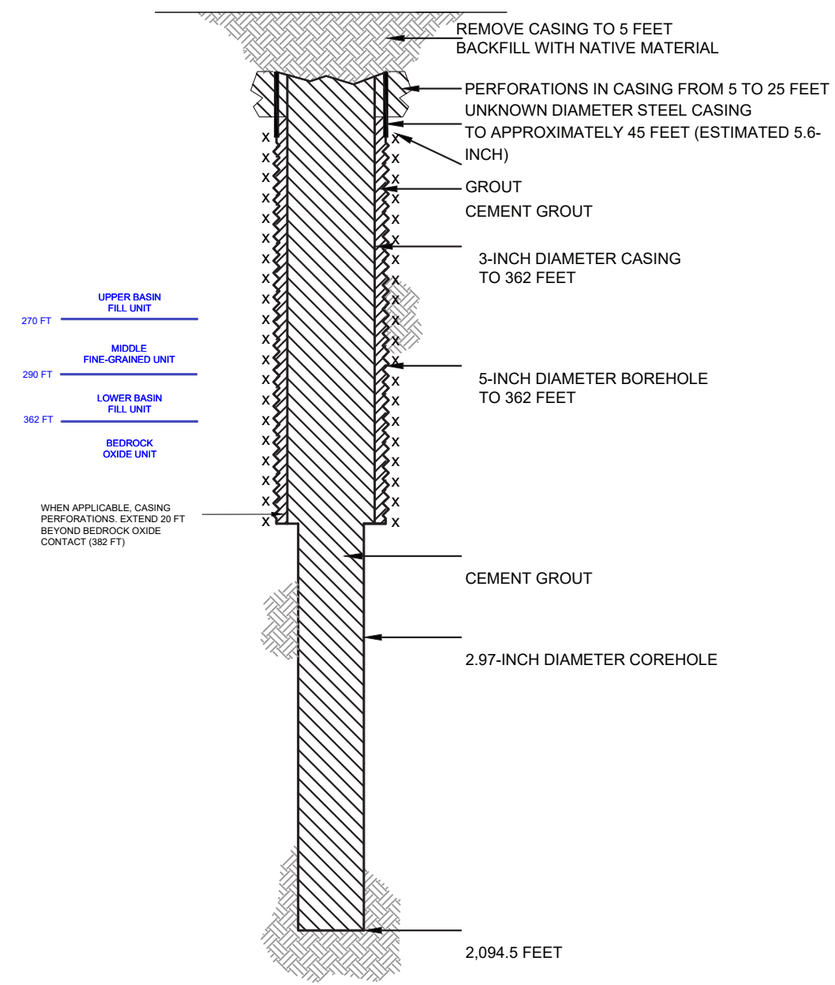
AS-BUILT COREHOLE 400MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 400MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 400MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

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R9UIC-AZ3-FY11-1		401MF

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

Surface Location

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Latitude 33.04900712

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ft. from (N/S) **Line of quarter section**

ft. from (E/W) **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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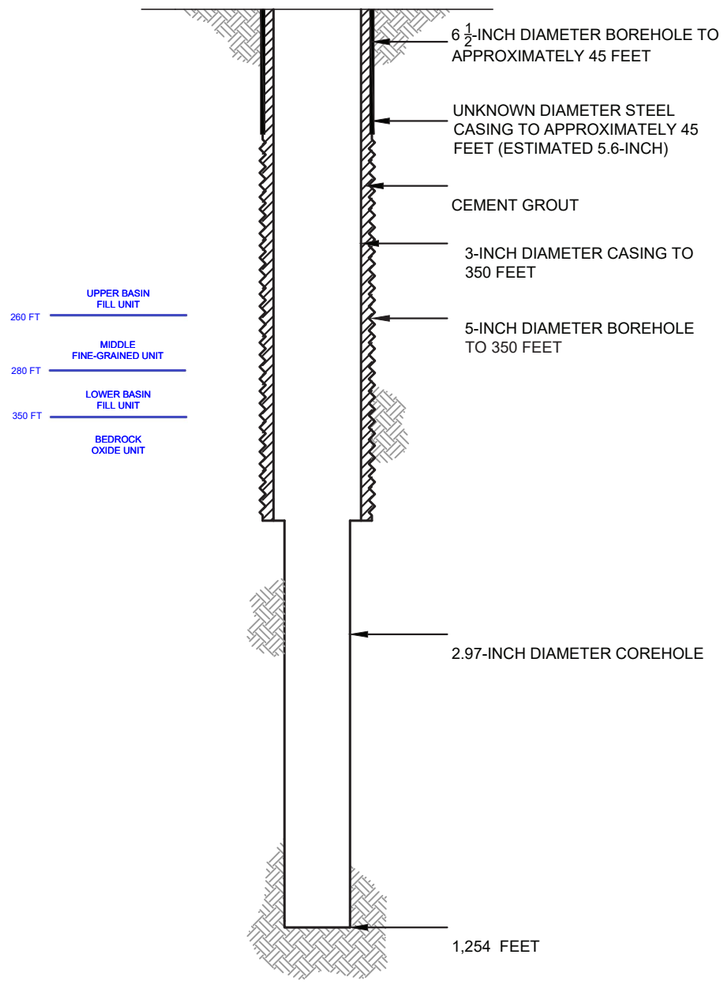
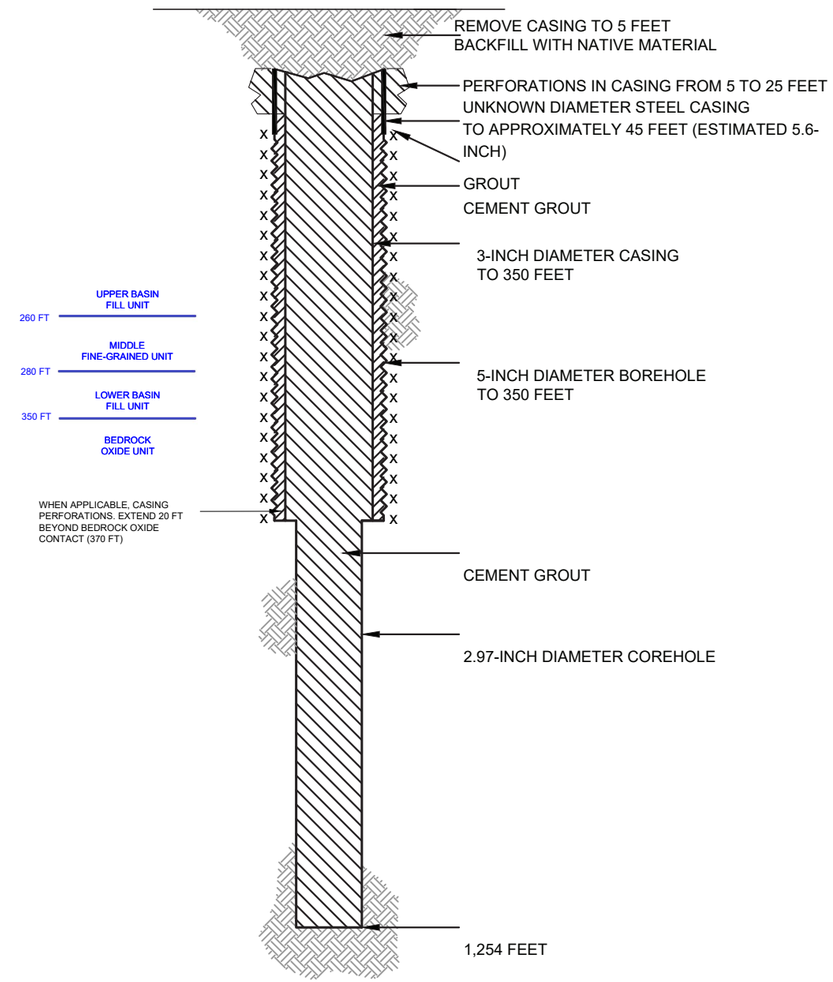
AS-BUILT COREHOLE 401MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 401MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 401MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		402MF

State	County
Arizona	Pinal

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

Latitude 33.04854468

Longitude -111.4256761

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Dan Johnson, VP - General Manager		10/3/2019

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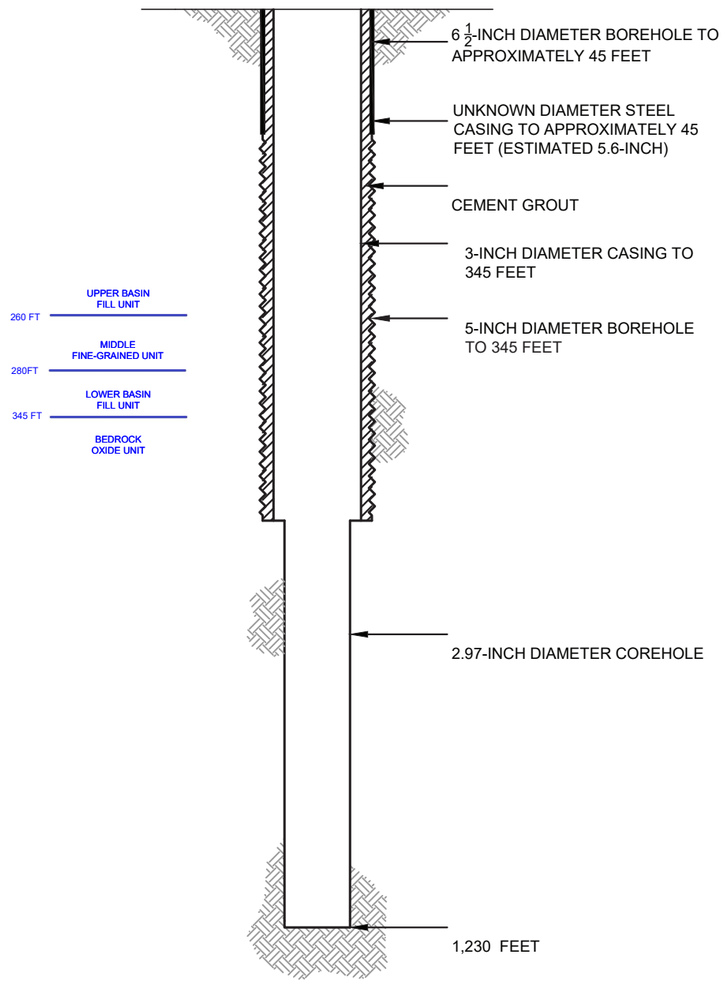
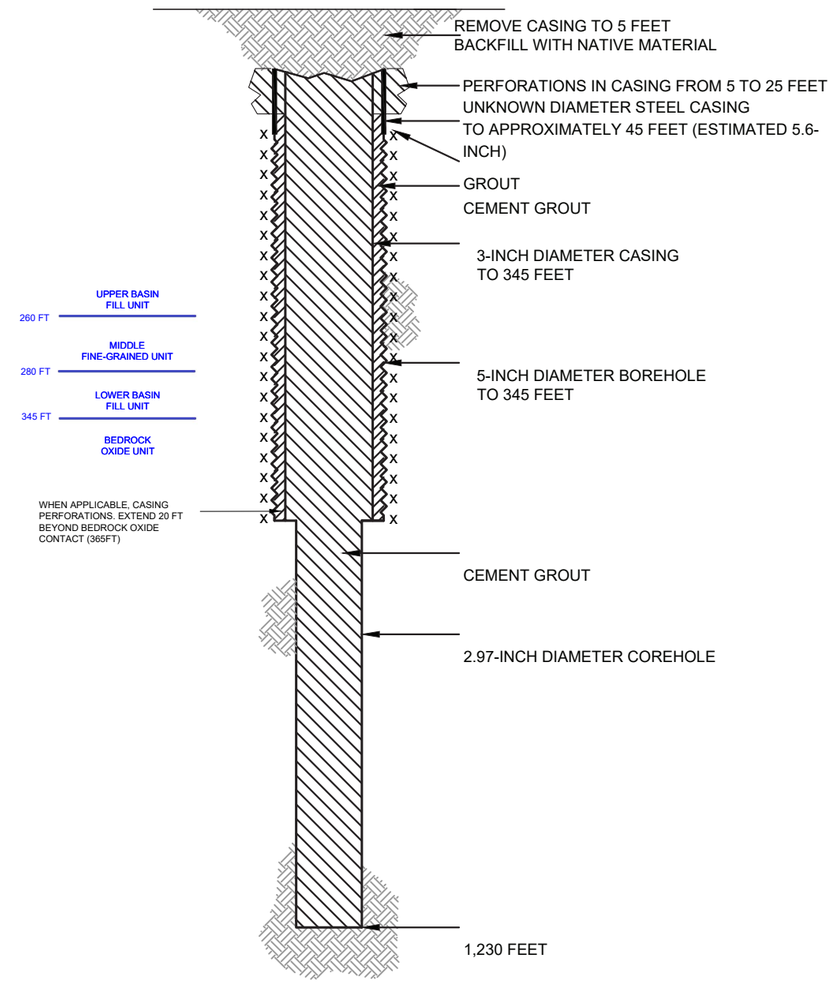
AS-BUILT COREHOLE 402MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 402MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 402MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		403MF

State	County
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_____ **ft. from (N/S)** _____ **Line of quarter section**

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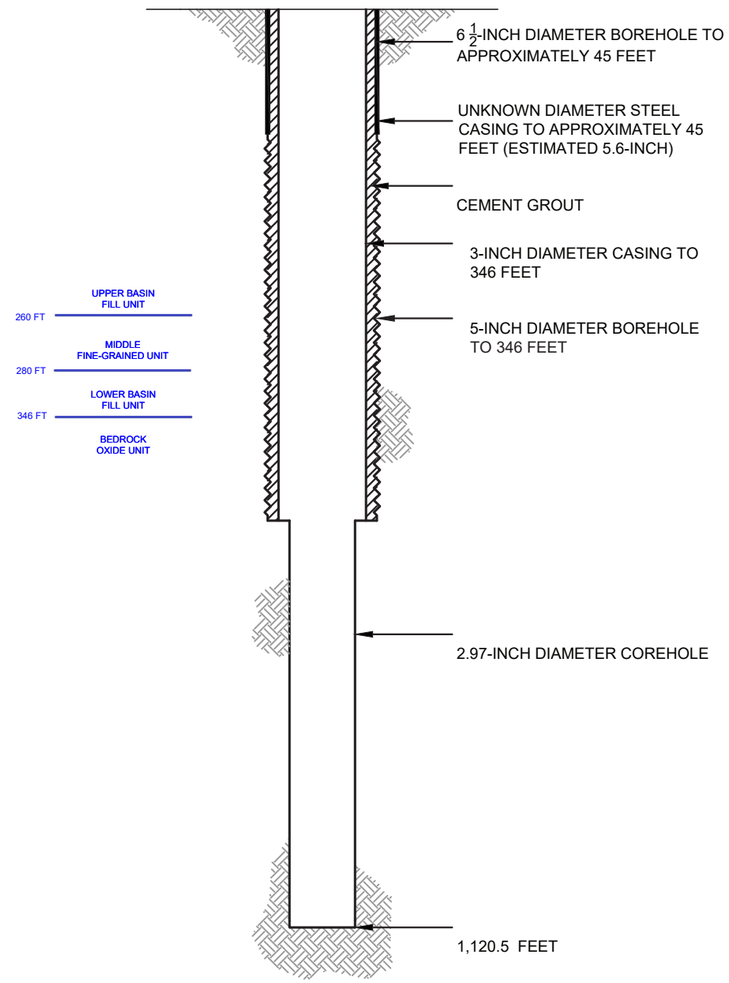
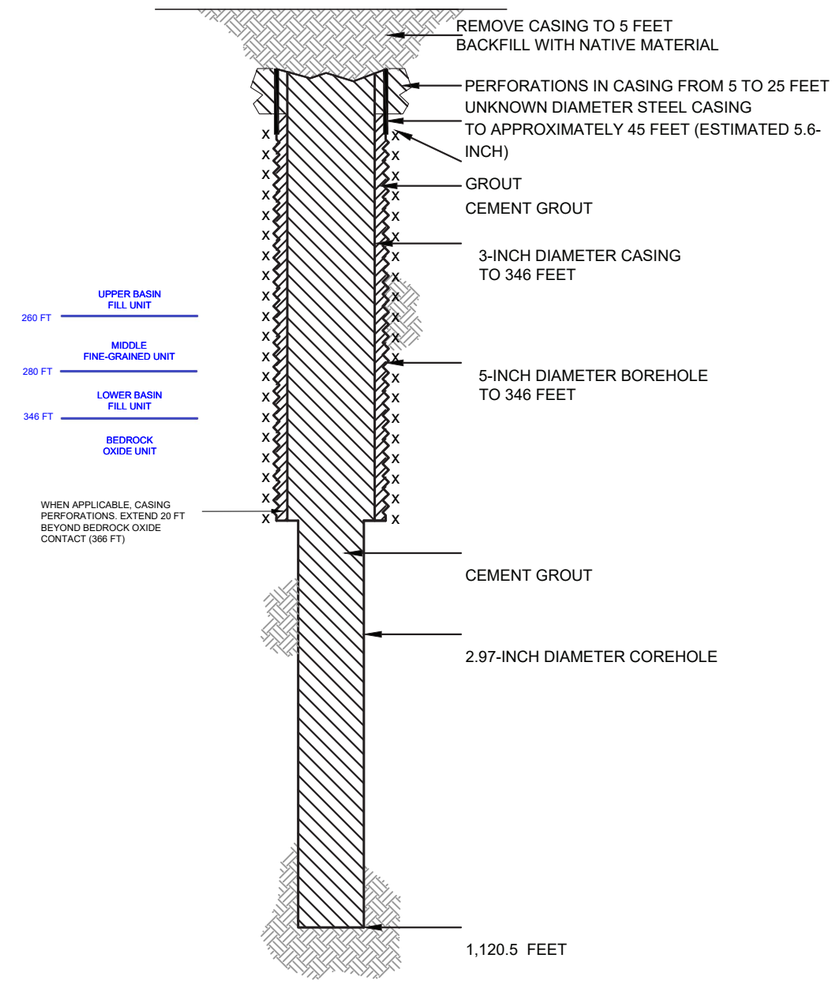


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 403MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 403MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		404S

State	County
Arizona	Pinal

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

Latitude 33.05211825

Longitude -111.4264722

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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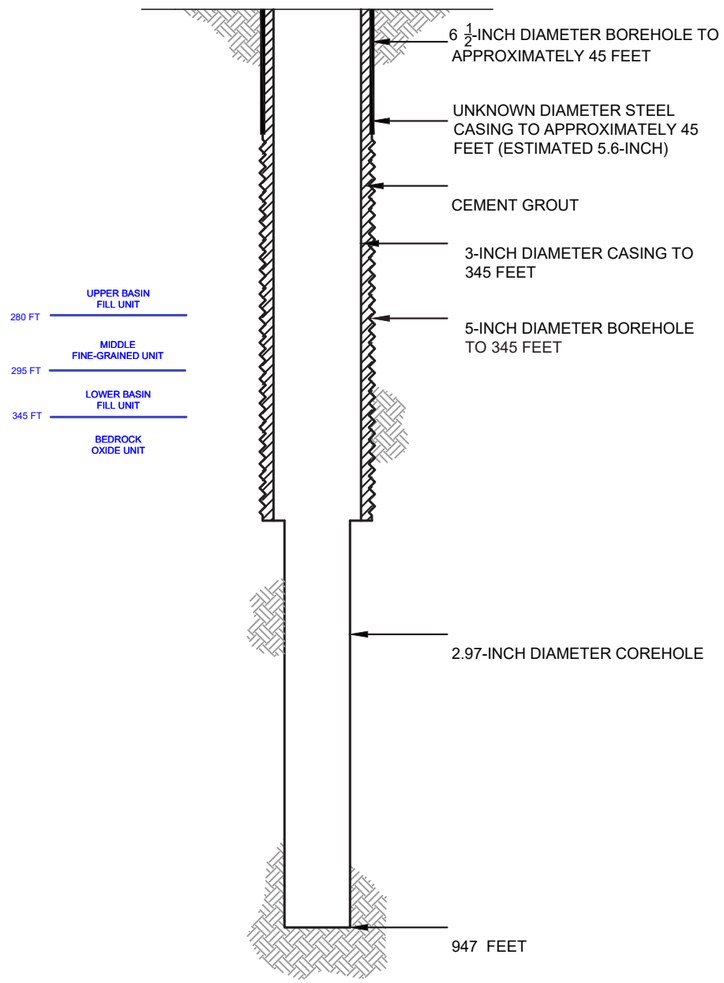
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

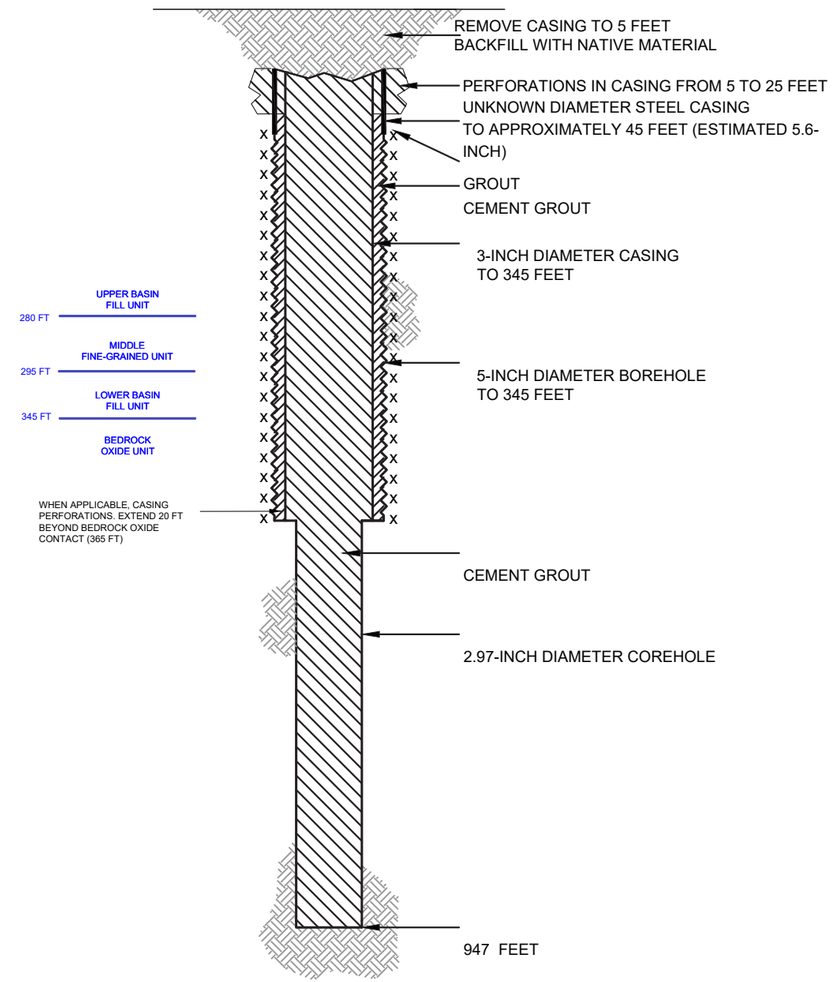
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 404S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 404S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 404S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		405S

State	County
Arizona	Pinal

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

Latitude 33.04973159

Longitude -111.4248536

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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Dan Johnson, VP - General Manager		10/3/2019

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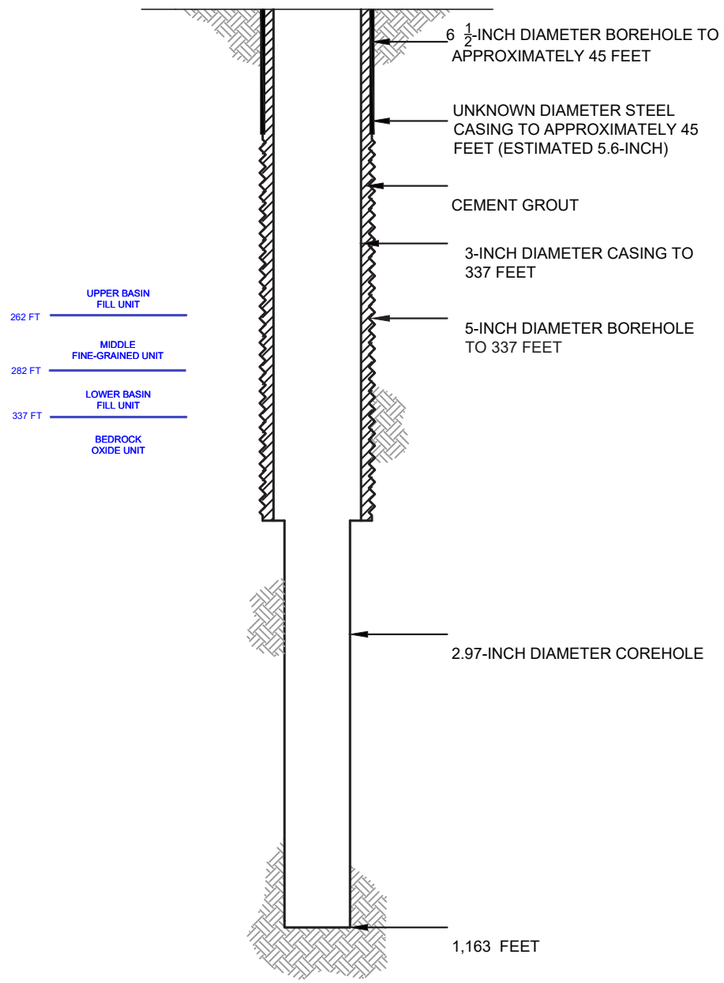
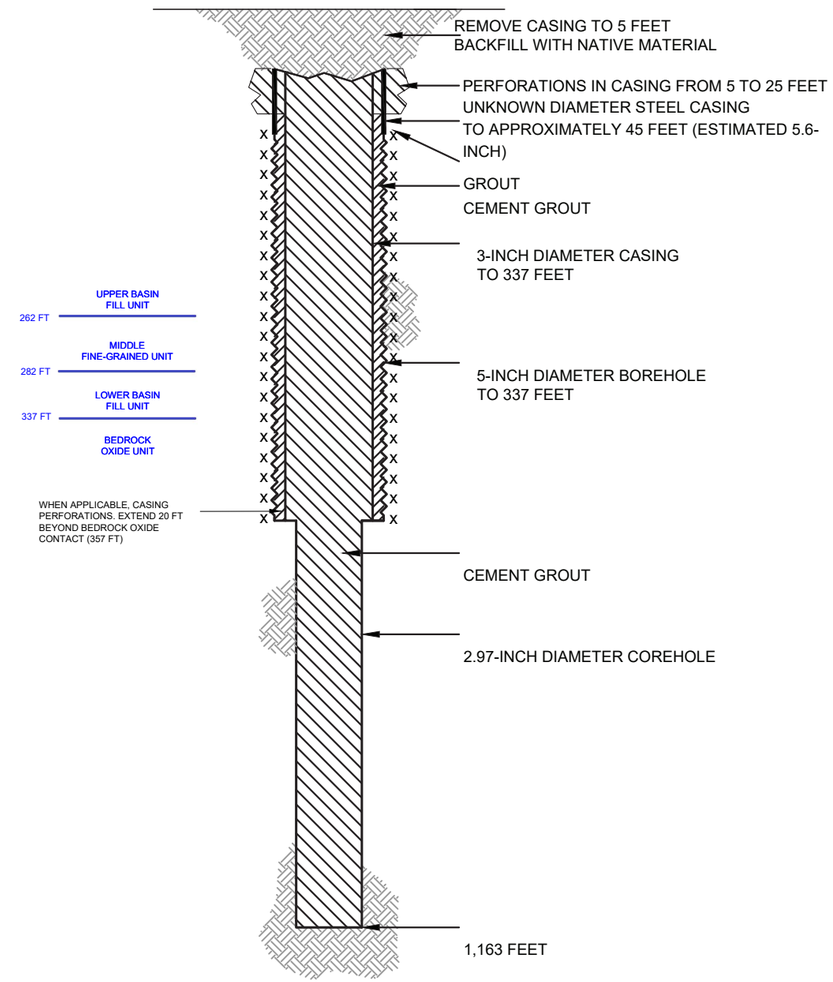
AS-BUILT COREHOLE 405S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 405S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 405S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		409MF

State	County
Arizona	Pinal

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

Latitude 33.04796401

Surface Location

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

Longitude -111.4293507

_____ **ft. from (N/S)** _____ **Line of quarter section**

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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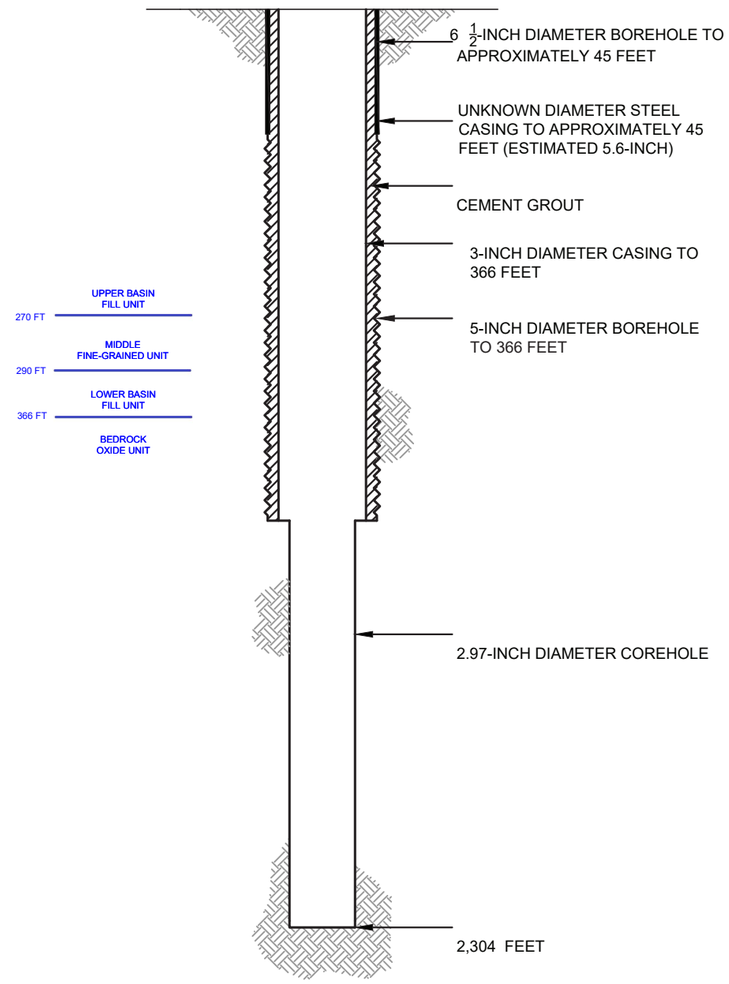
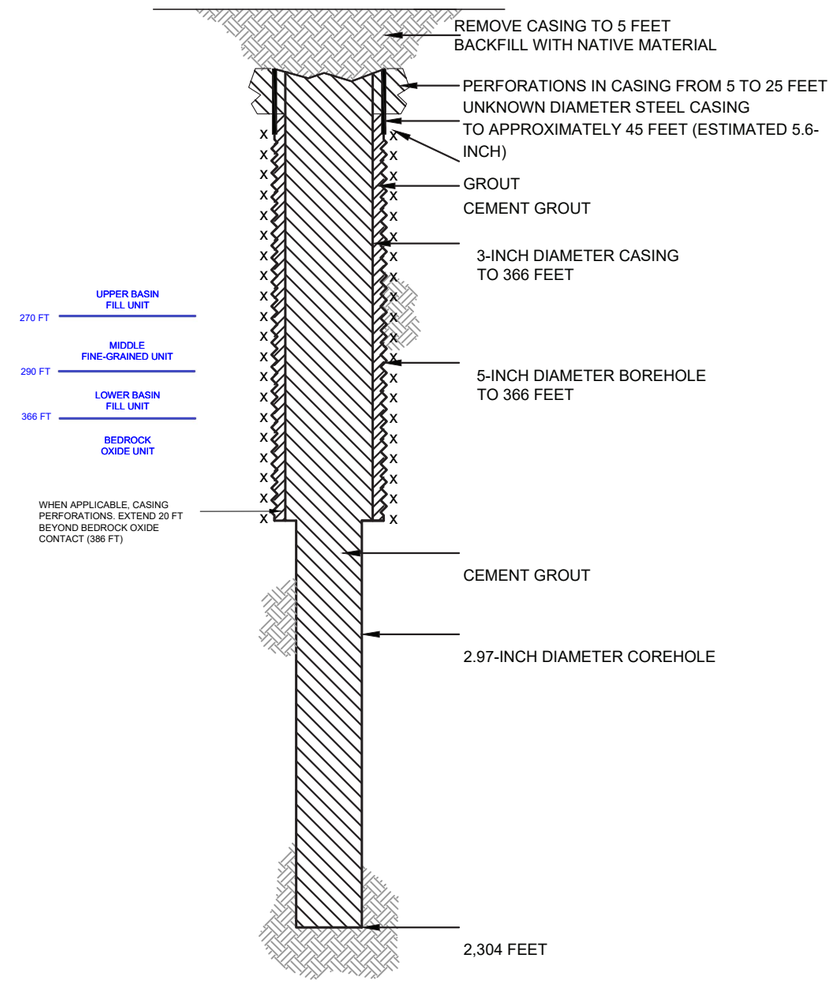
AS-BUILT COREHOLE 409MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 409MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 409MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		410MF

State	County
Arizona	Pinal

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

Latitude 33.04796082

Longitude -111.4285349

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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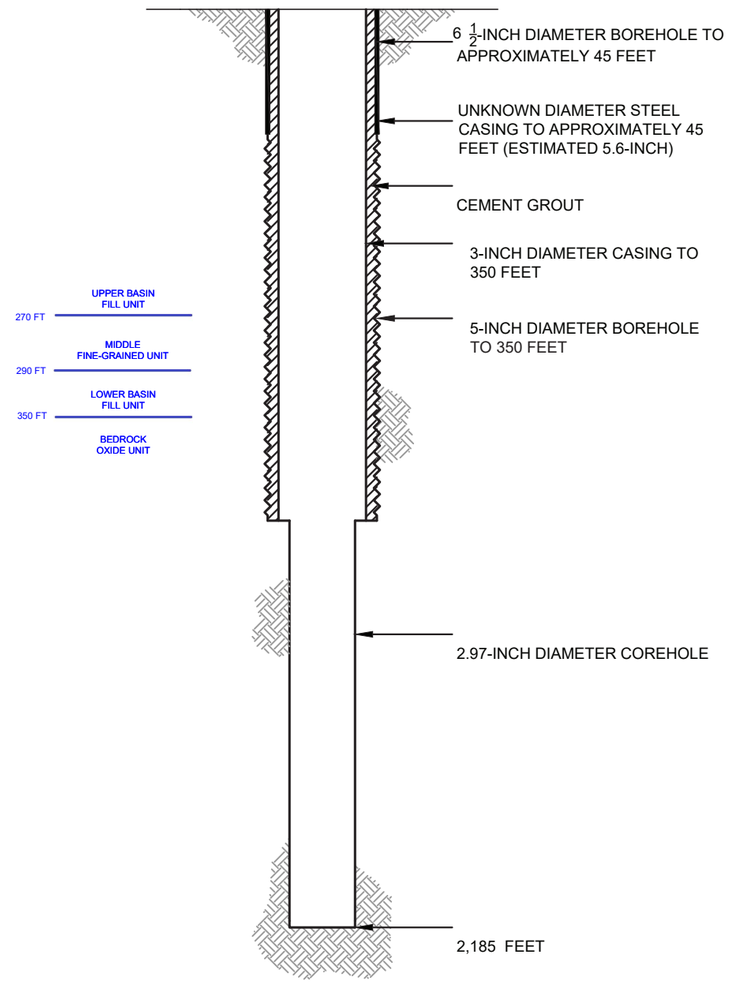
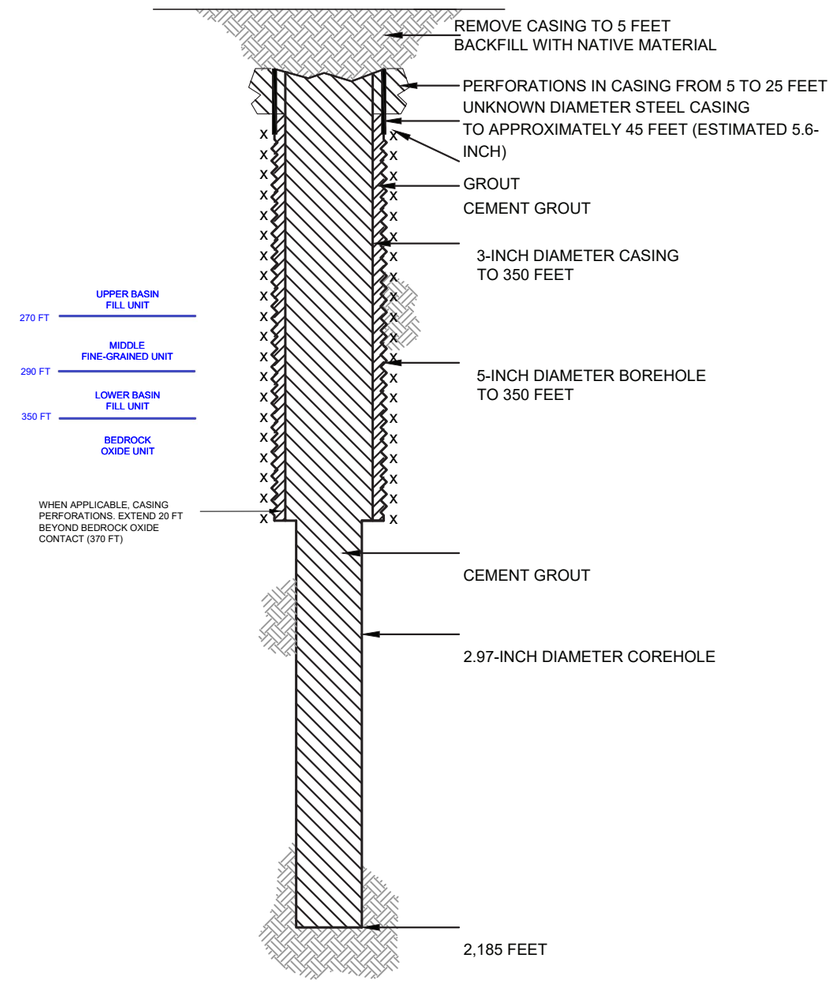


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 410MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 410MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		411MF

State	County
Arizona	Pinal

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

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Longitude -111.427719

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_____ **ft. from (N/S)** _____ **Line of quarter section**

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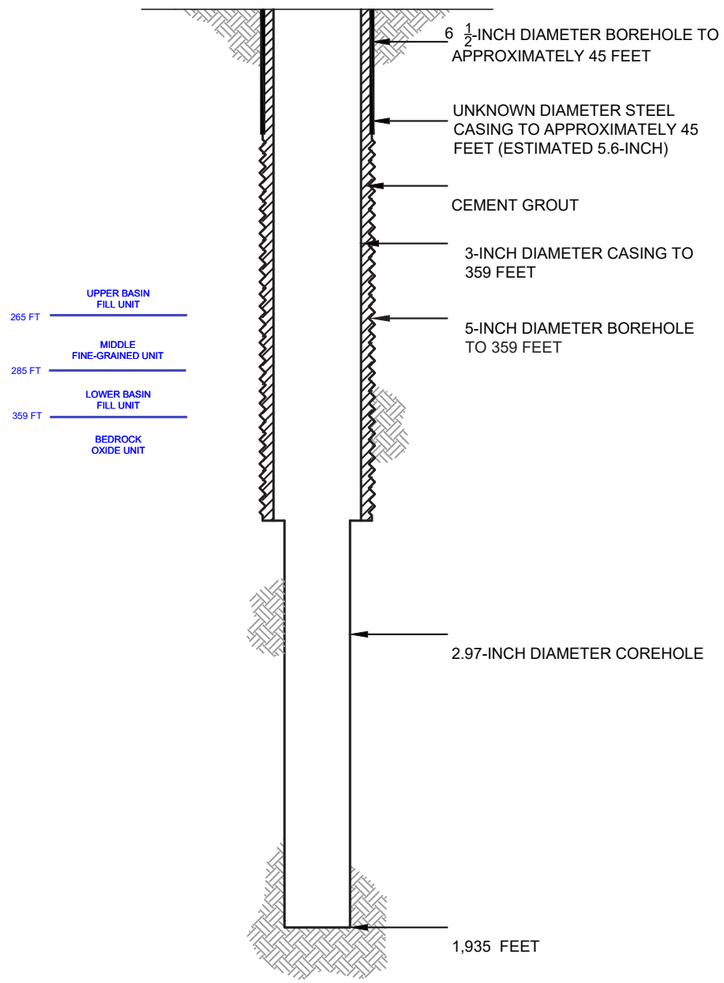

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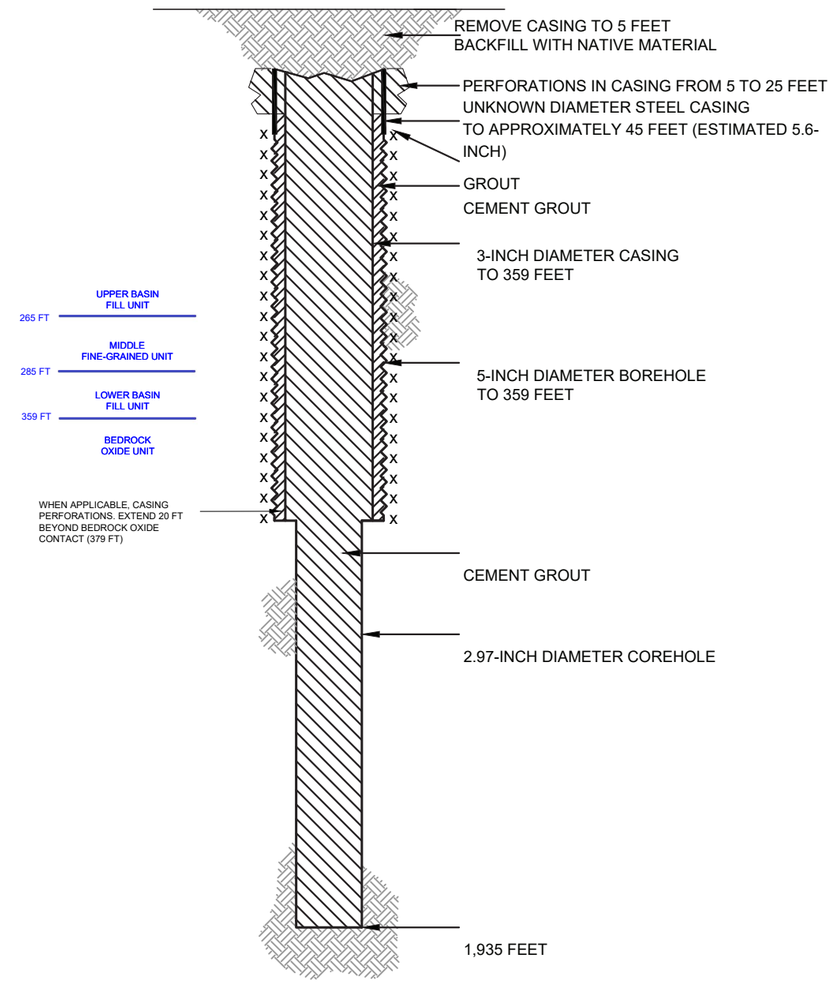

HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 411MF DIAGRAM

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NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

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TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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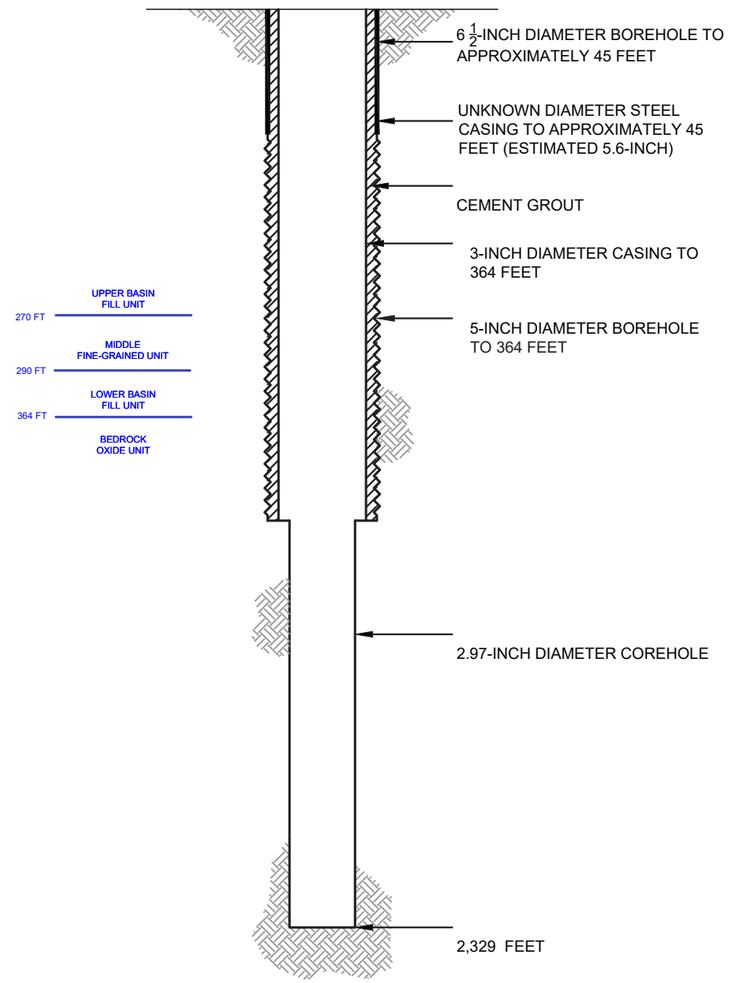
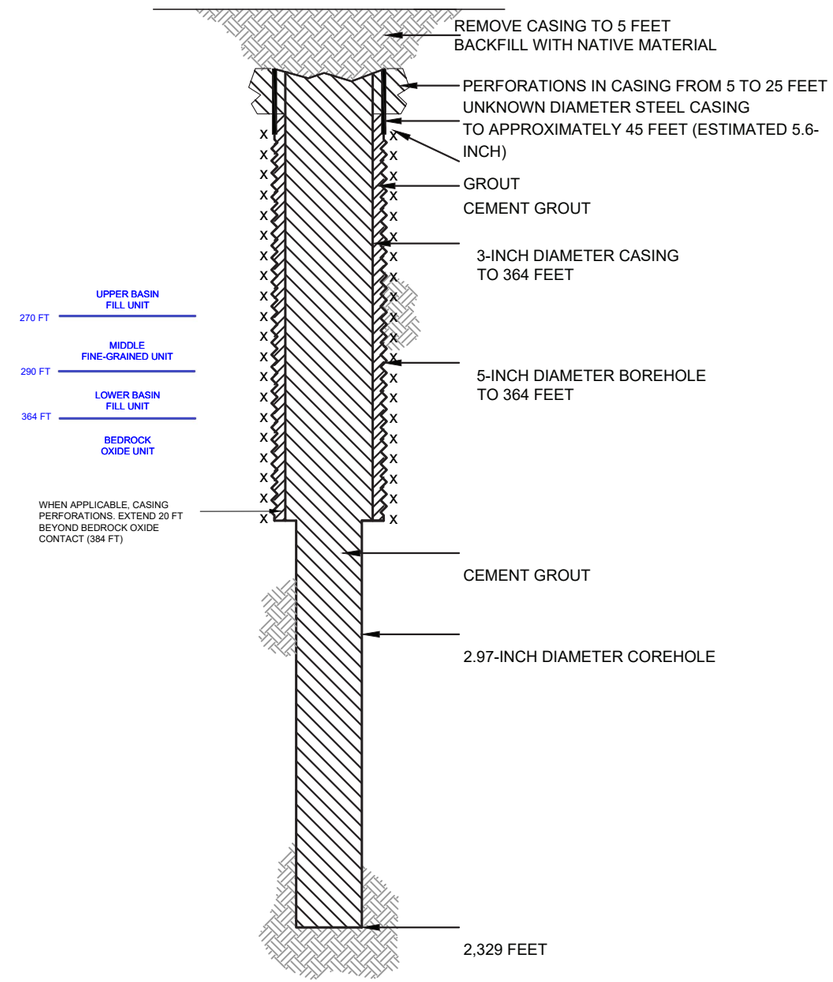
AS-BUILT COREHOLE 412MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 412MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 412MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		413MF

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.04735776

Longitude -111.4264985

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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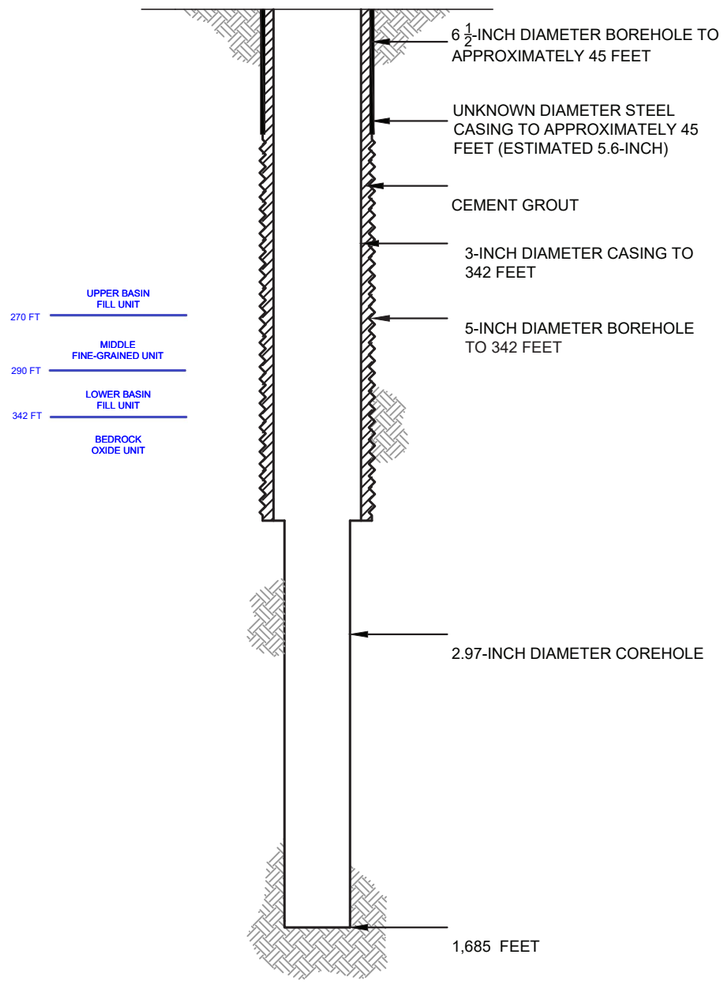
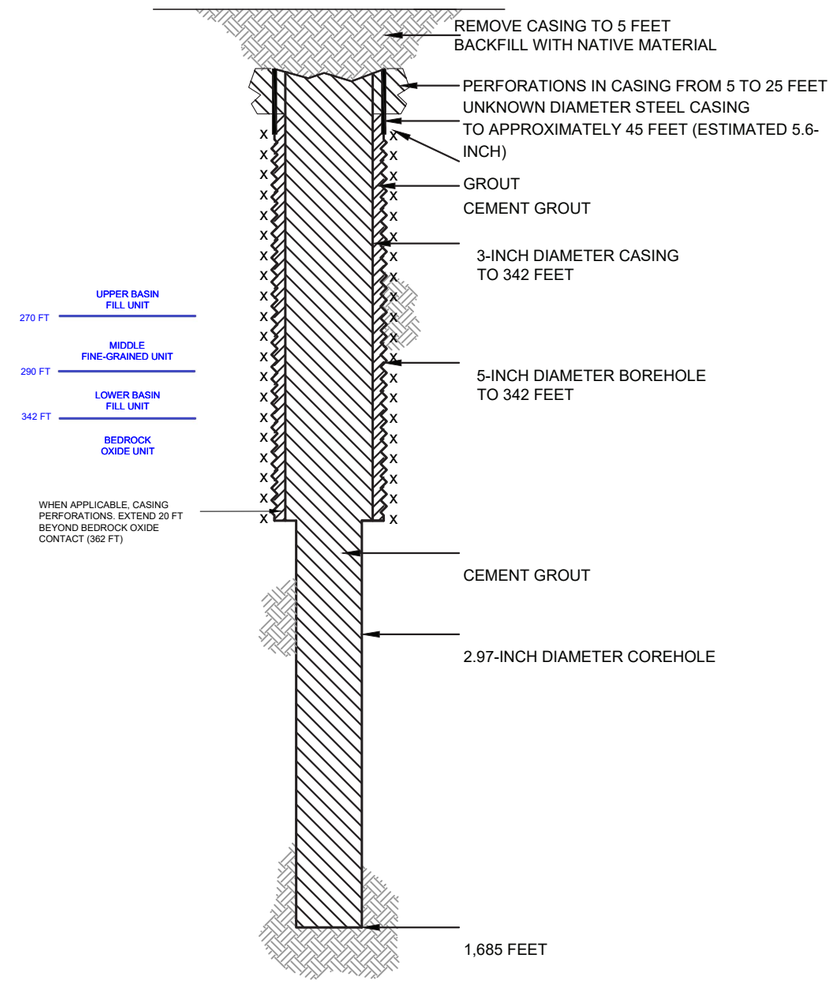
AS-BUILT COREHOLE 413MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 413MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 413MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		416S

State	County
Arizona	Pinal

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

Latitude 33.05154392

Longitude -111.4317787

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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

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

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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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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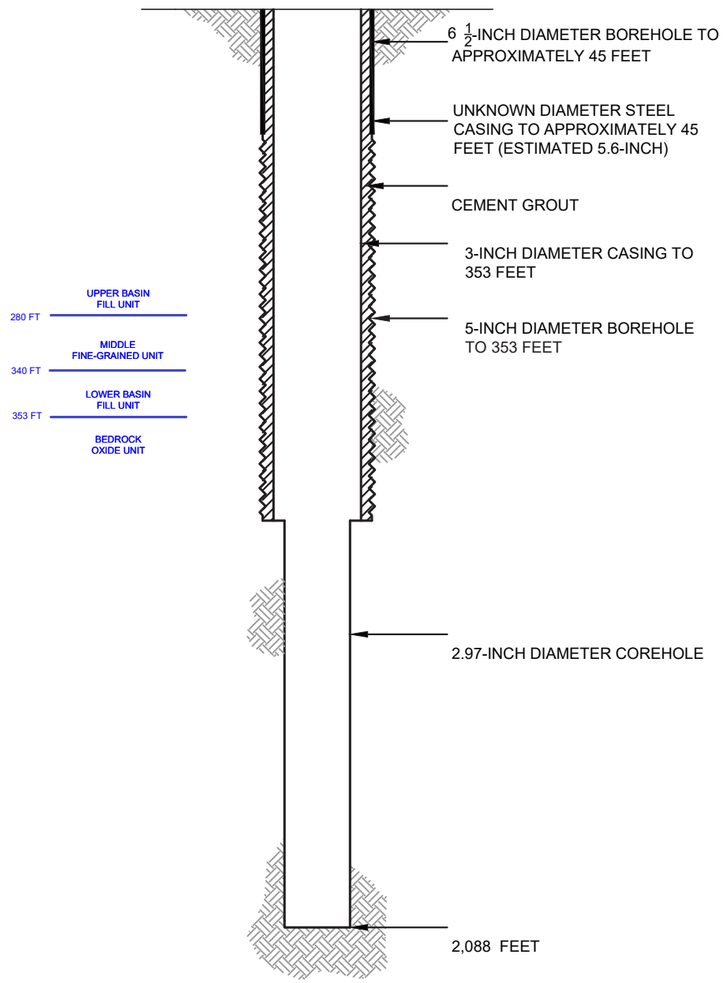
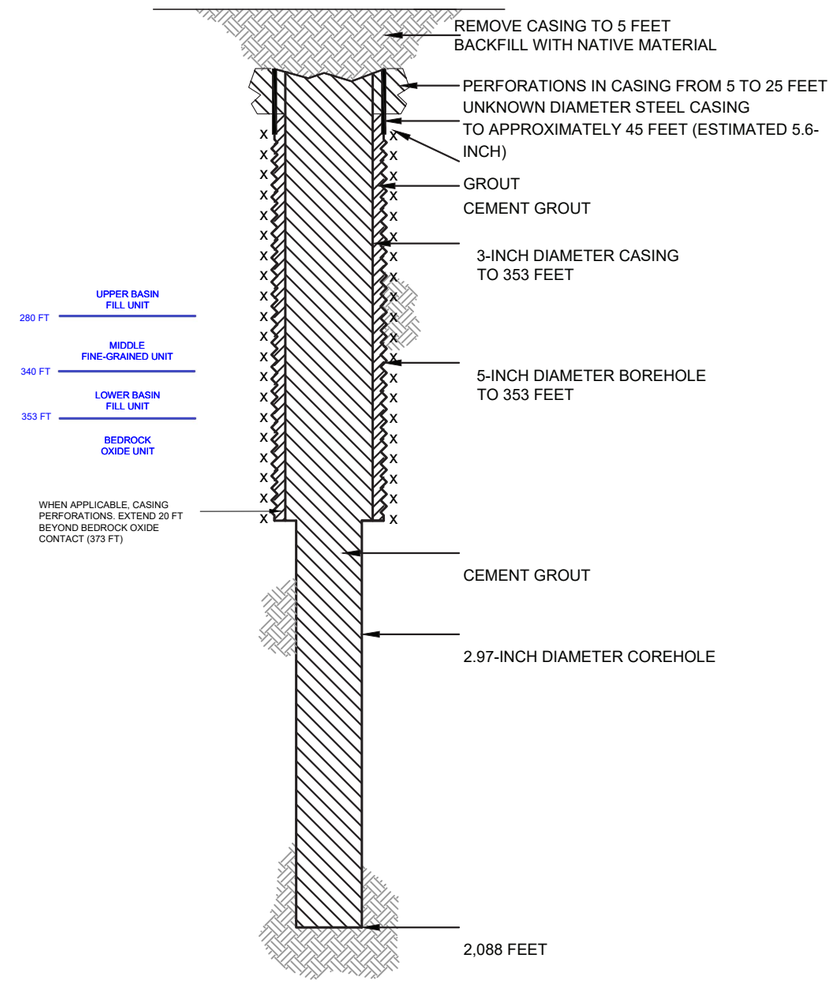
AS-BUILT COREHOLE 416S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 416S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 416S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\416S ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		417S

State	County
Arizona	Pinal

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

Latitude 33.05274038

Surface Location

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

Longitude -111.433404

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

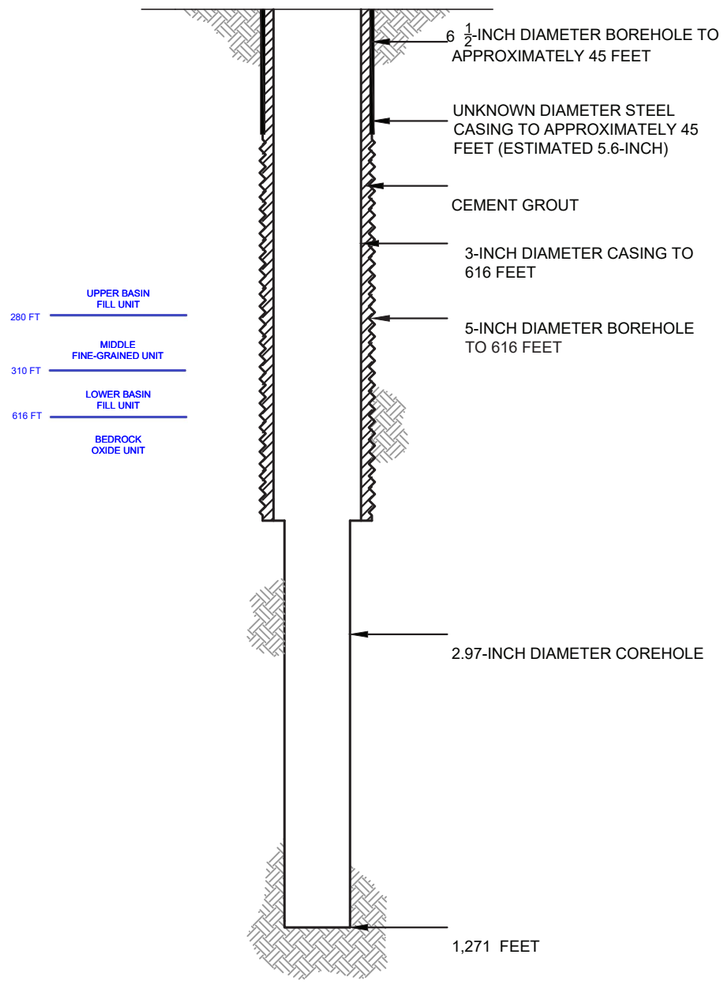
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

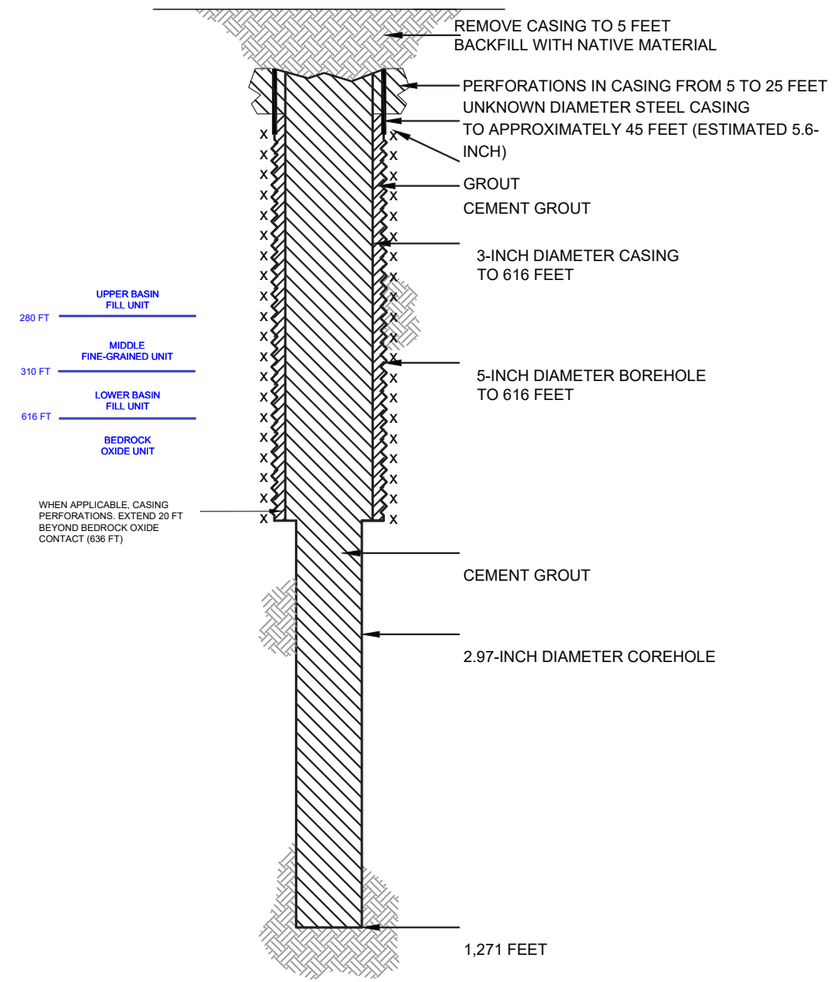
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 417S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 417S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 417S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		420S

State	County
Arizona	Pinal

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

Latitude 33.0521374

Longitude -111.4313675

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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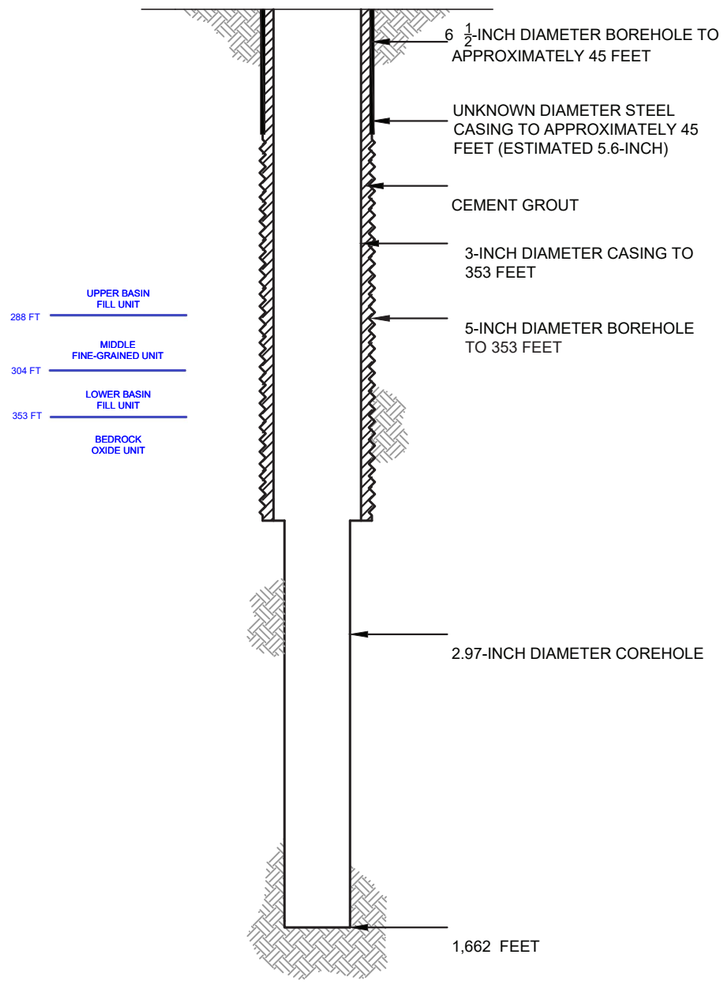
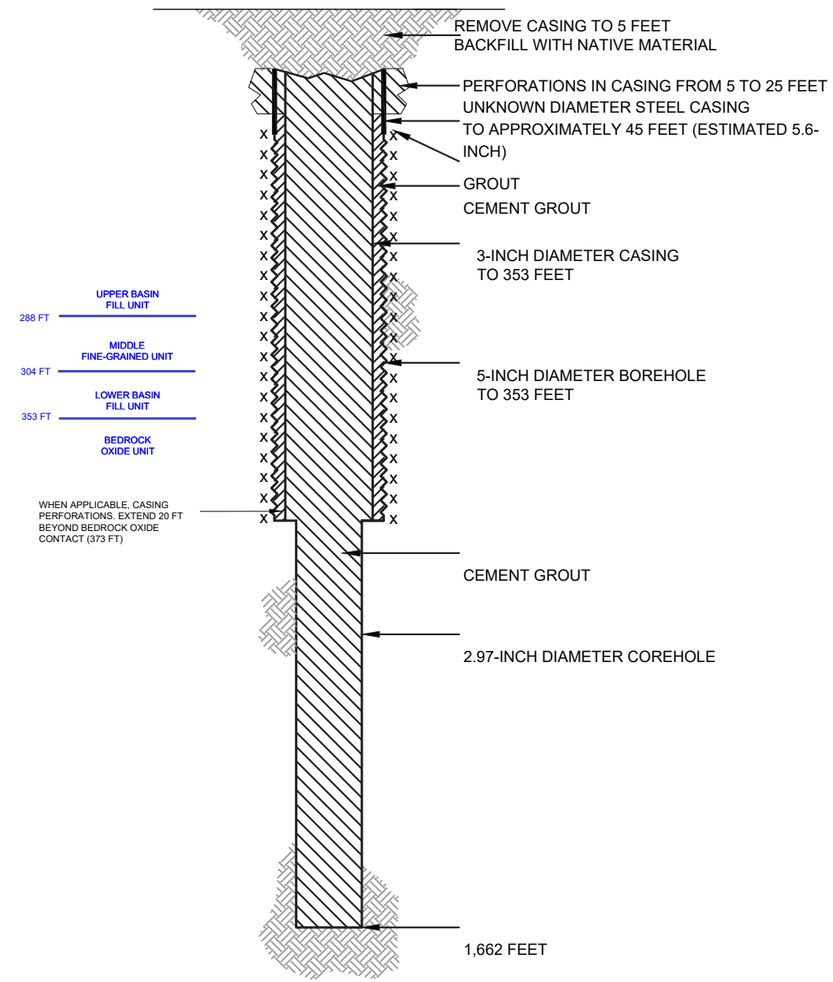
AS-BUILT COREHOLE 420S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 420S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 420S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		422MF

State	County
Arizona	Pinal

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

Latitude 33.04737054

Longitude -111.4297619

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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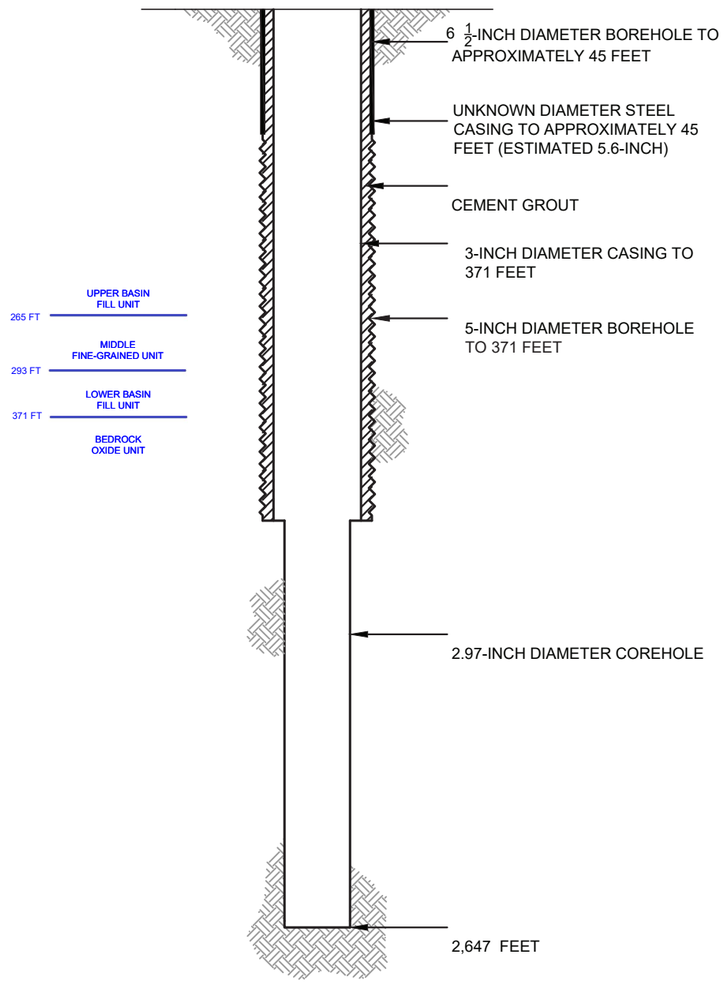
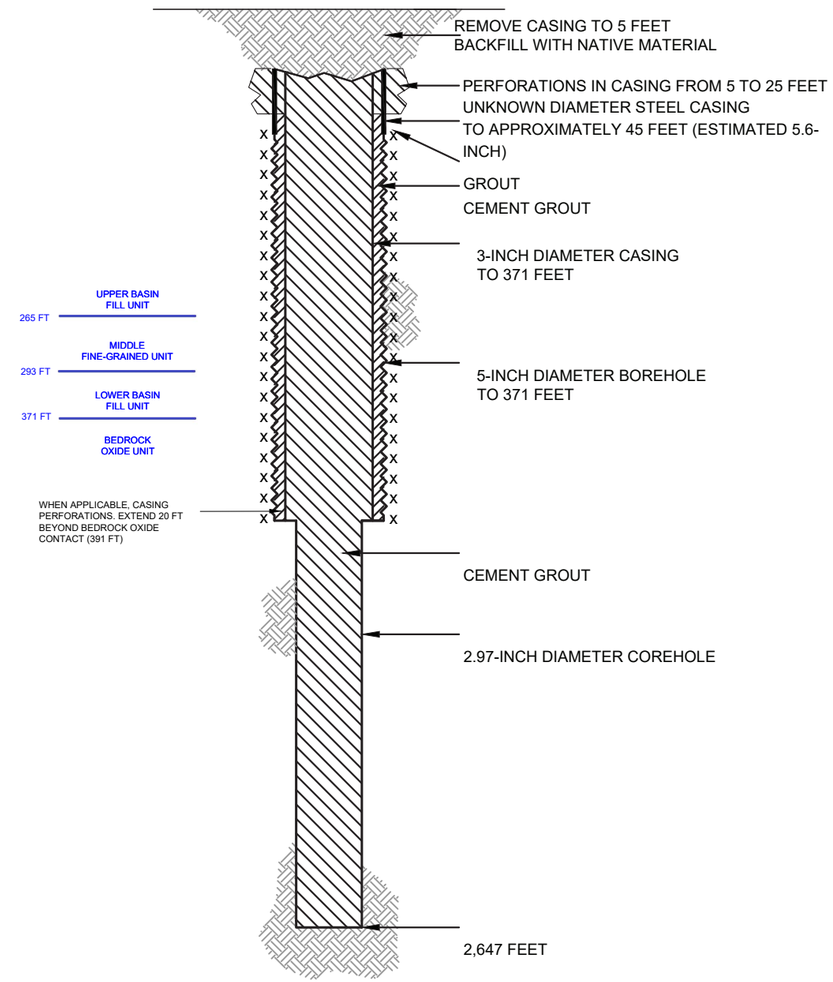
AS-BUILT COREHOLE 422MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 422MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 422MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		431MF

State	County
Arizona	Pinal

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

Latitude 33.0467707

Longitude -111.4285414

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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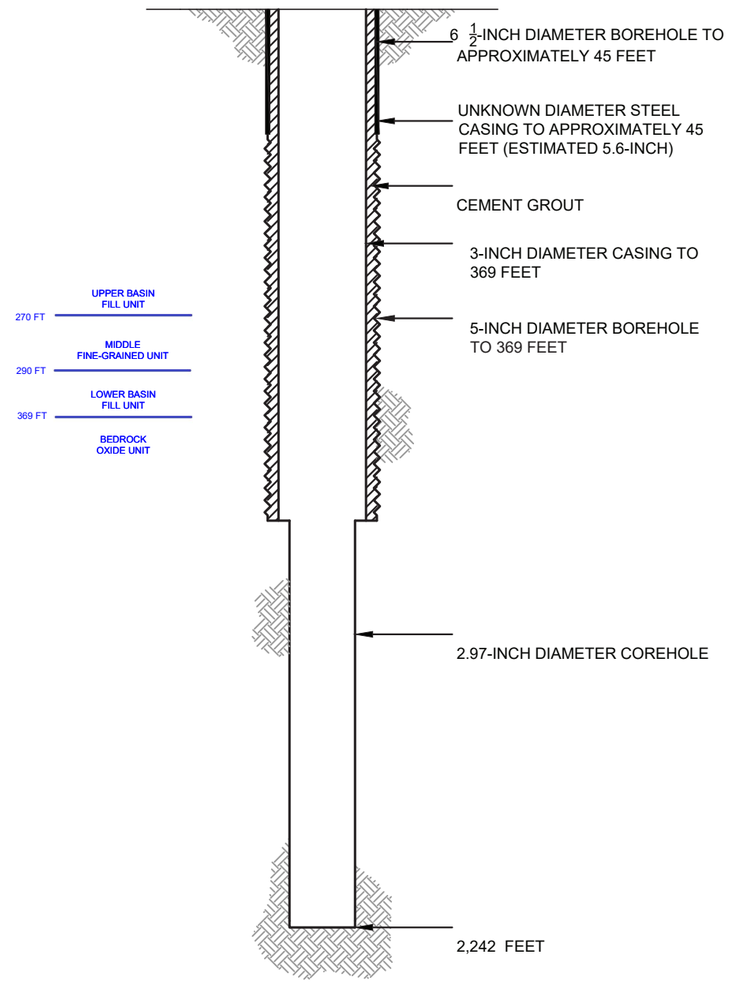
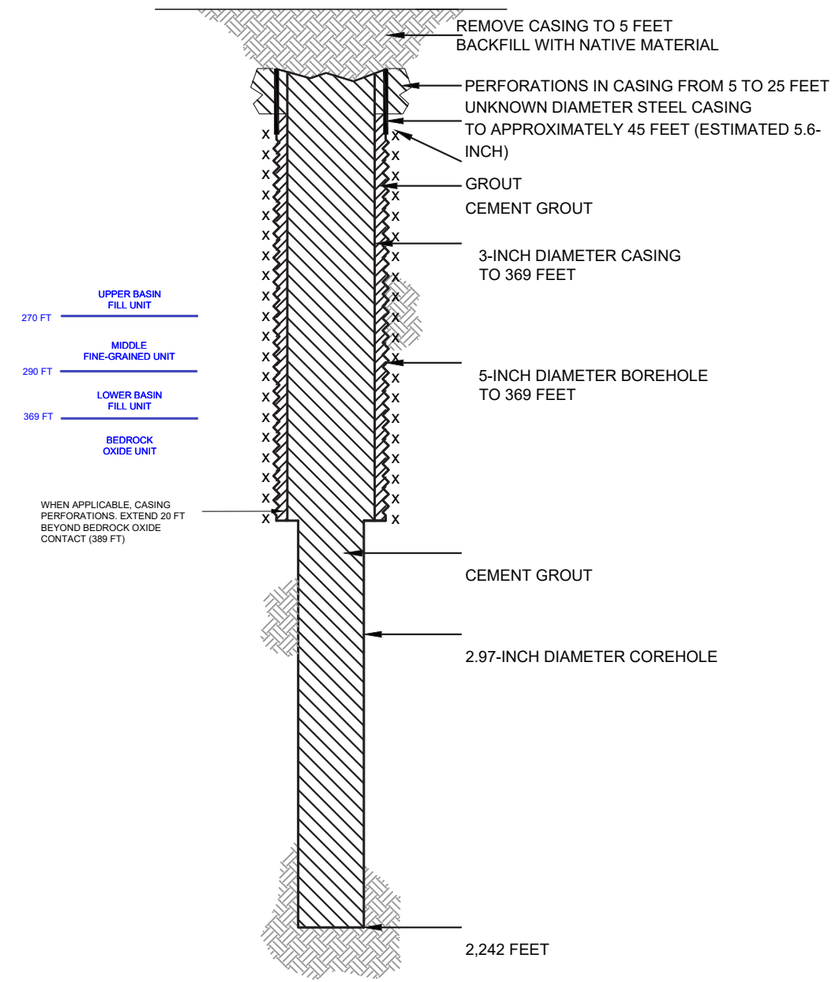
AS-BUILT COREHOLE 431MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 431MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 431MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		432MF

State	County
Arizona	Pinal

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

Latitude 33.0467675

Surface Location

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

Longitude -111.4277256

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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Dan Johnson, VP - General Manager		10/3/2019

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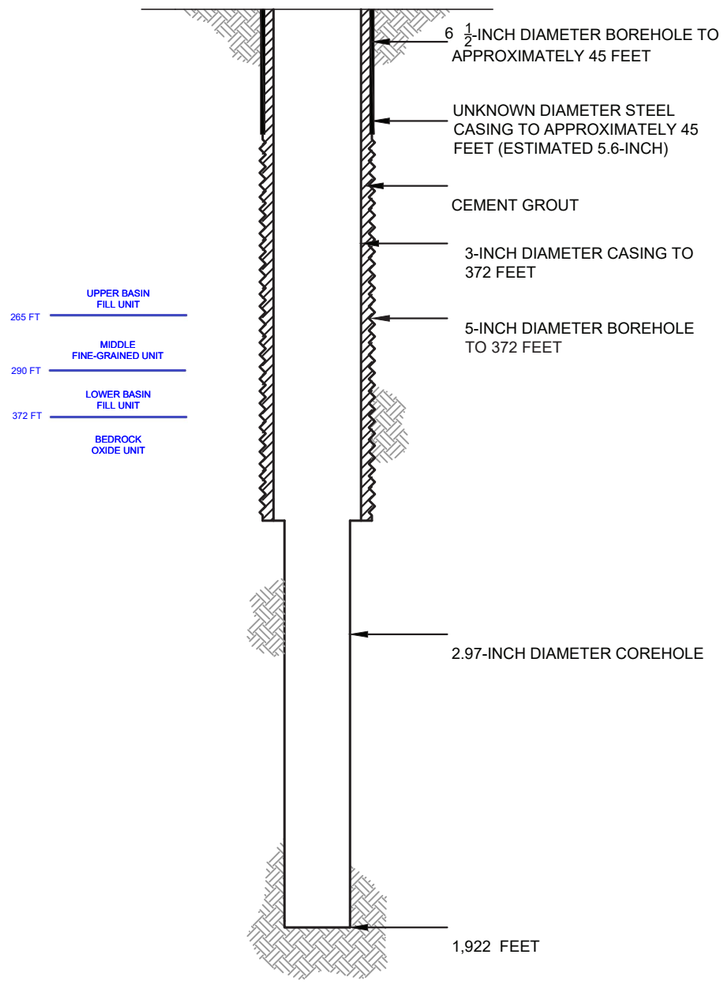
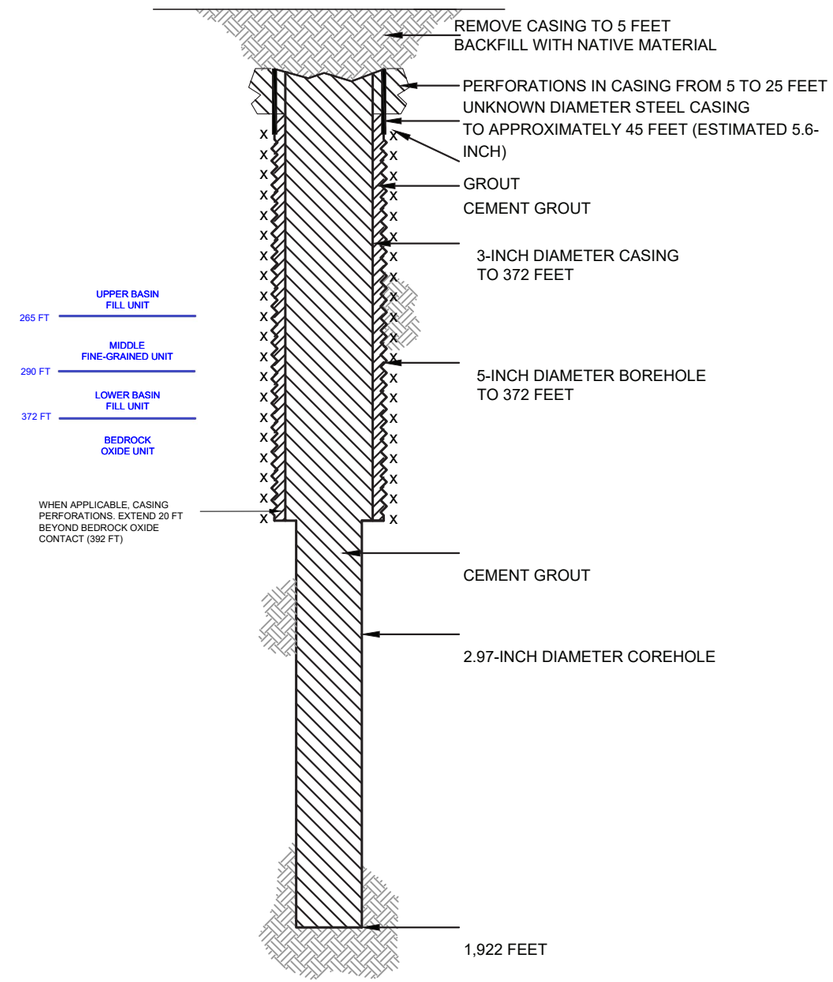
AS-BUILT COREHOLE 432MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 432MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 432MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		433MF

State	County
Arizona	Pinal

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

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04499347

Longitude -111.4305909

_____ ft. from (N/S) _____ Line of quarter section

_____ ft. from (E/W) _____ Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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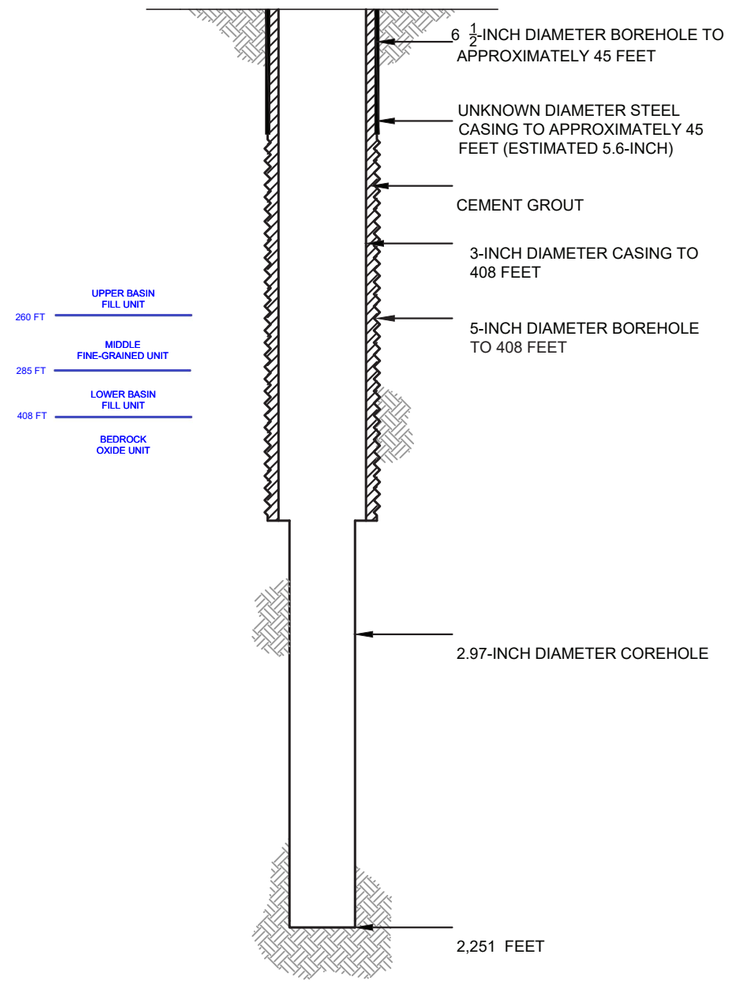
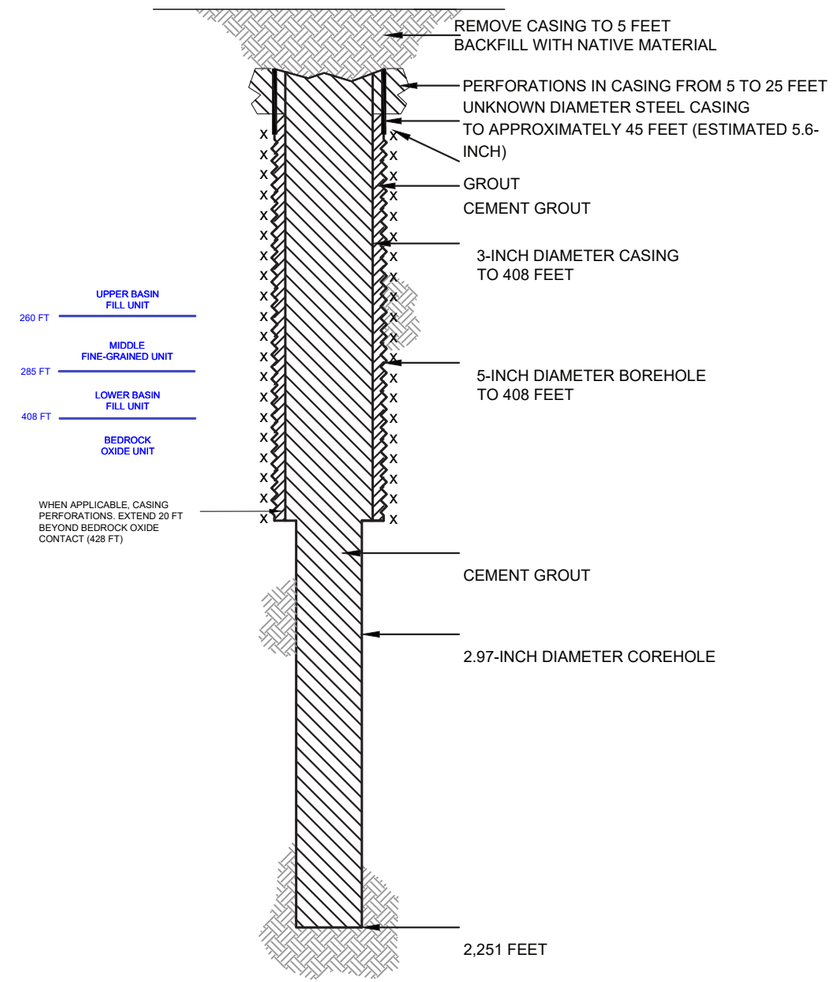


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 433MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 433MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		435MF

State	County
Arizona	Pinal

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

Latitude 33.04617723

Longitude -111.4289526

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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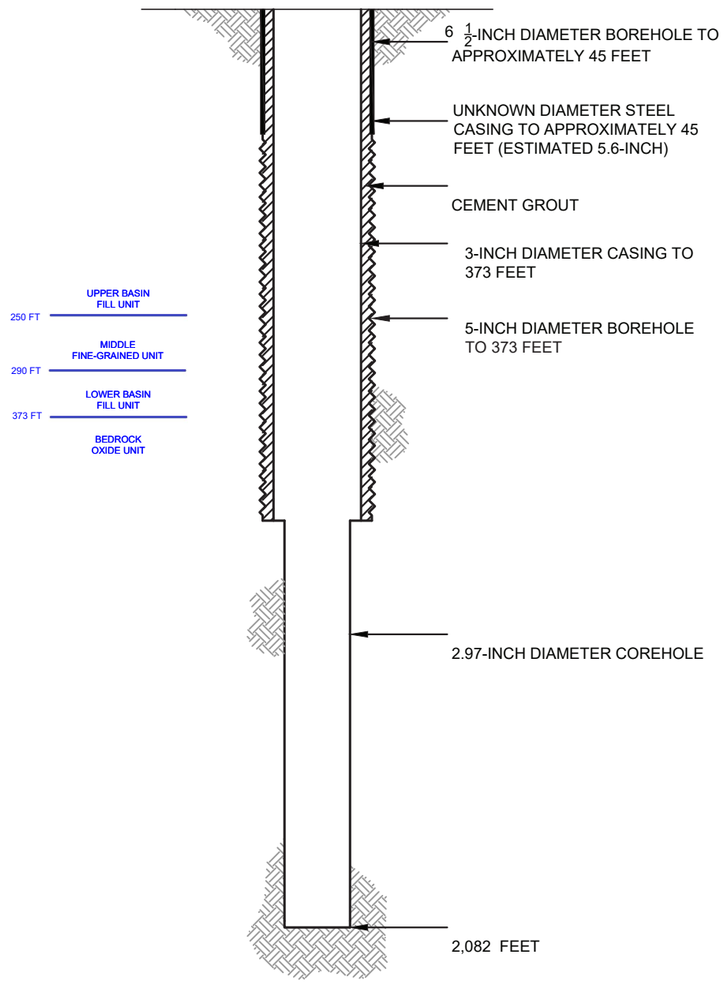
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

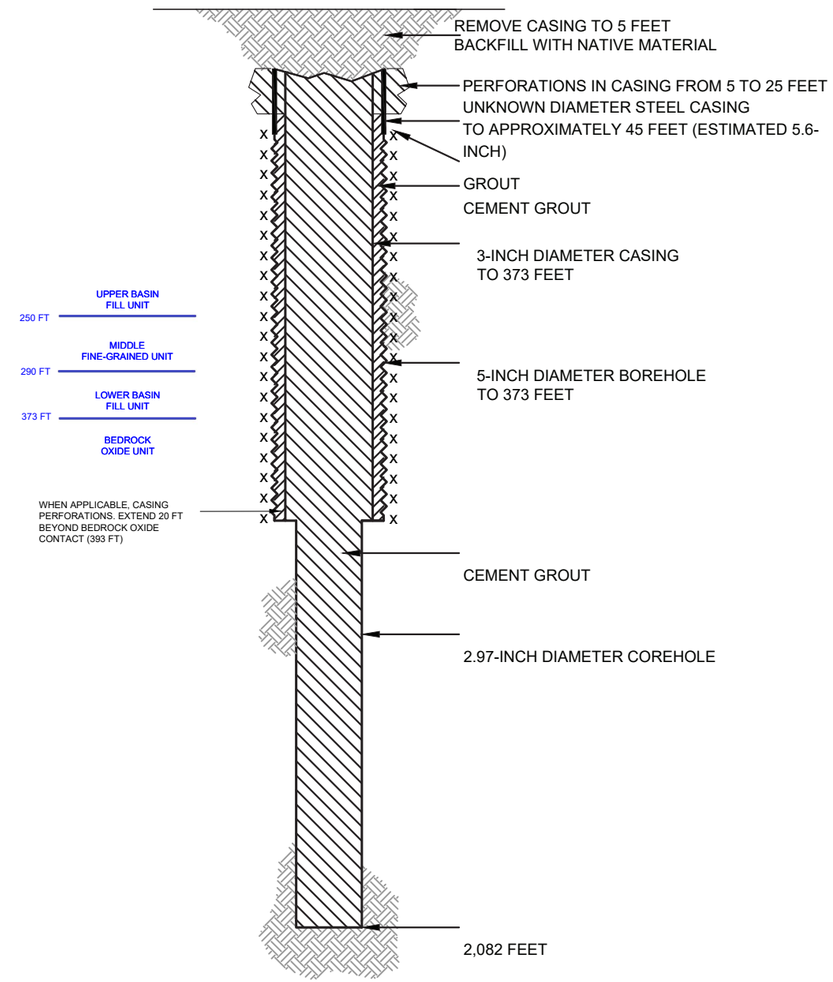
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 435MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 435MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 435MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870\6-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		436MF

State	County
Arizona	Pinal

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

Latitude 33.04617084

Longitude -111.427321

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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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 - General Manager		10/3/2019

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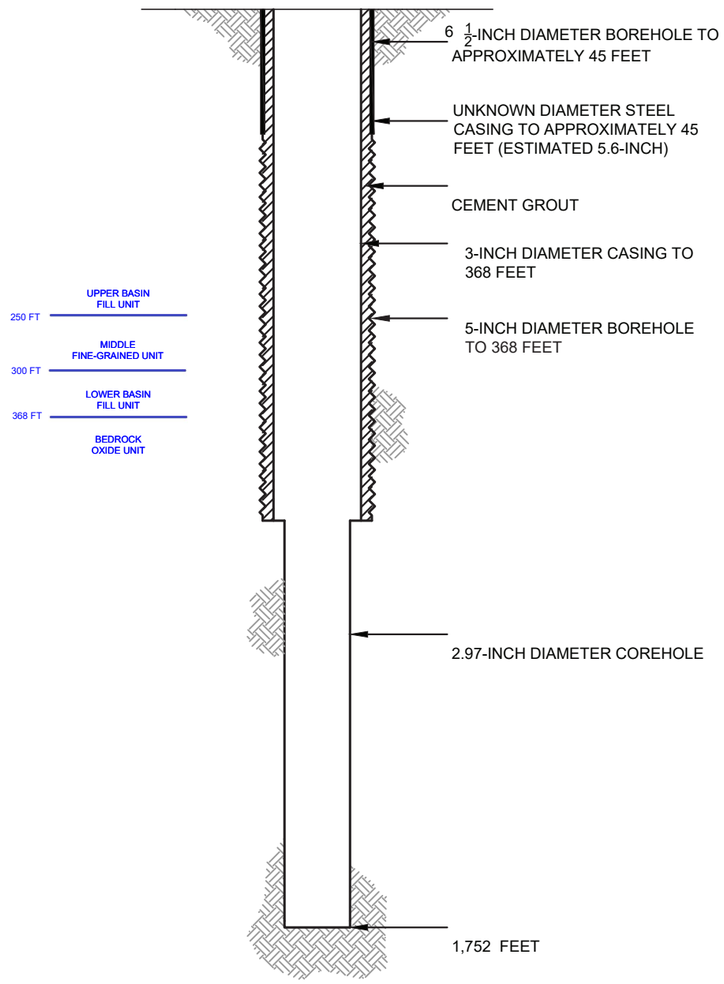
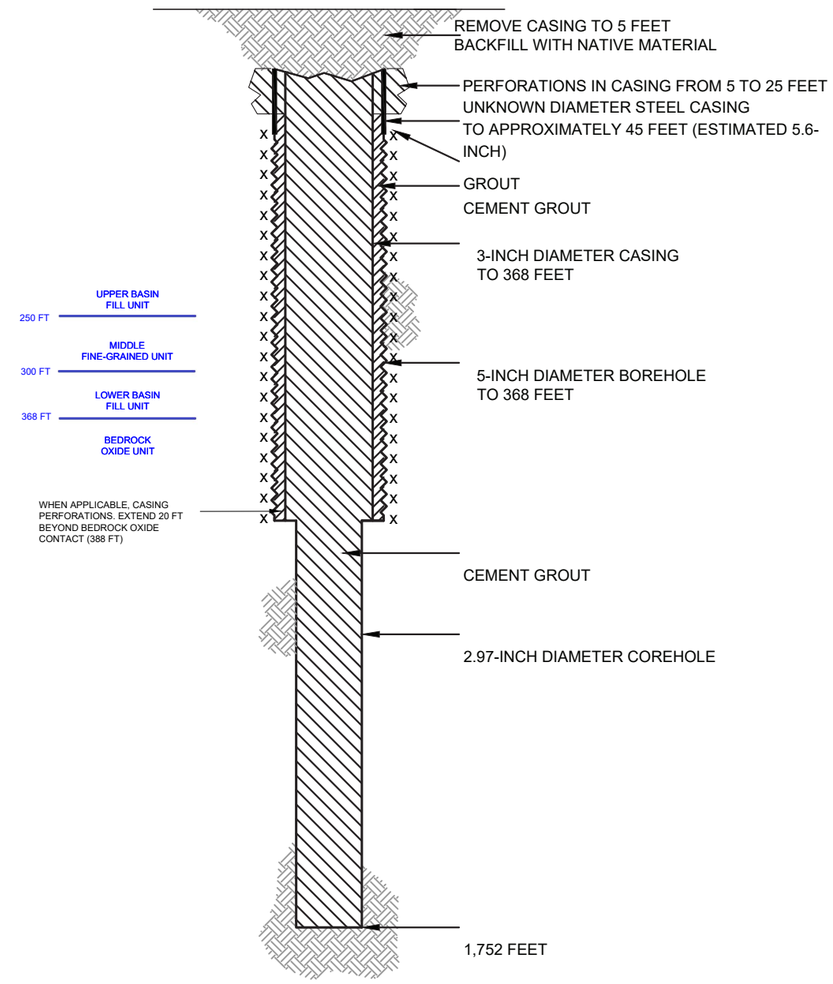


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 436MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 436MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		439S

State	County
Arizona	Pinal

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Surface Location

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_____ **ft. from (N/S)** _____ **Line of quarter section**

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For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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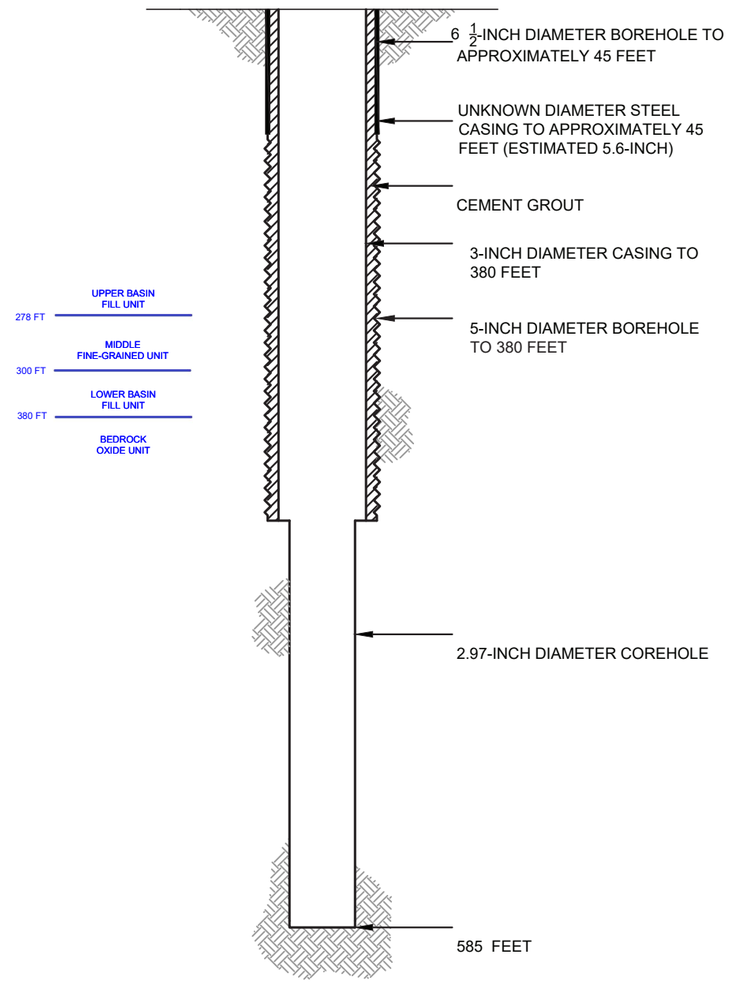
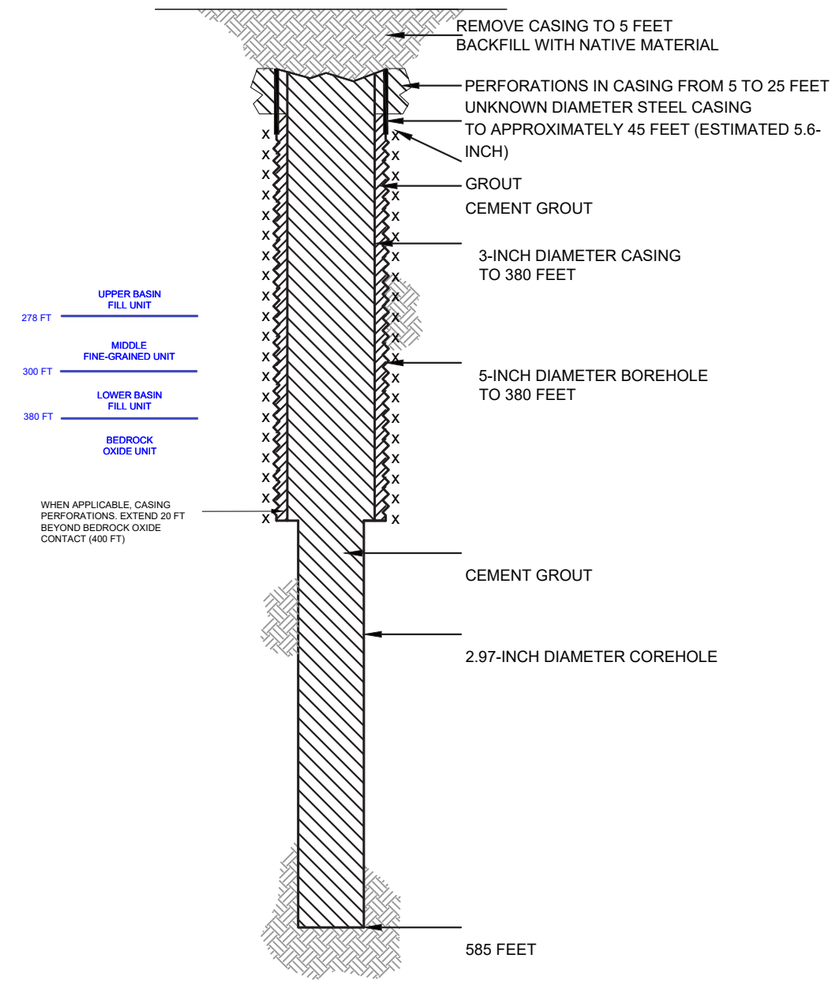
AS-BUILT COREHOLE 439S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 439S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 439S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\3870G-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		440S

State	County
Arizona	Pinal

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

Latitude 33.05273344

Surface Location

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

Longitude -111.4350206

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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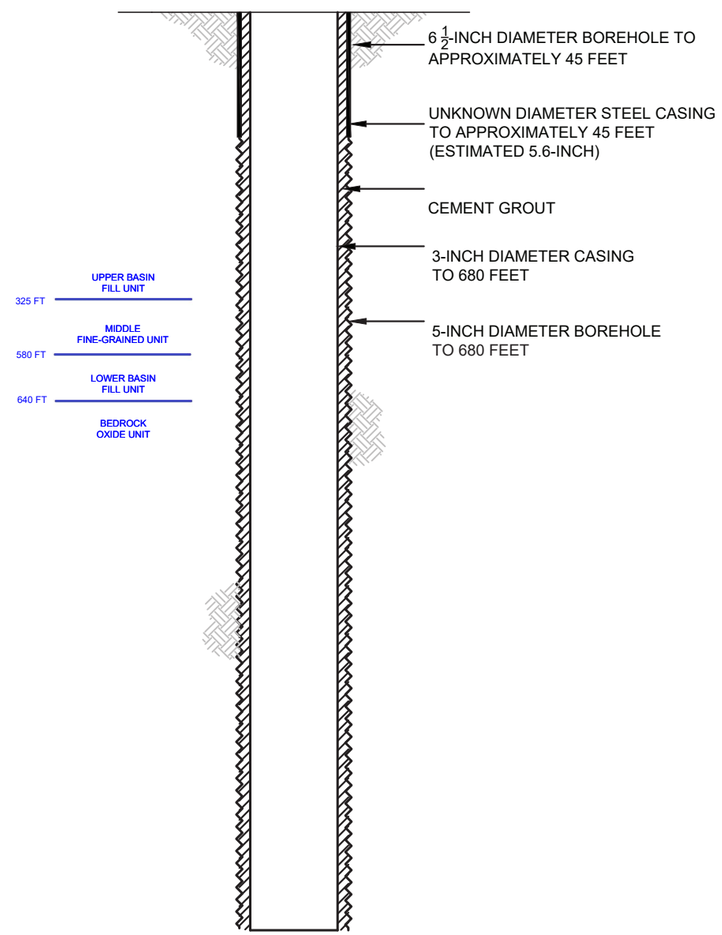
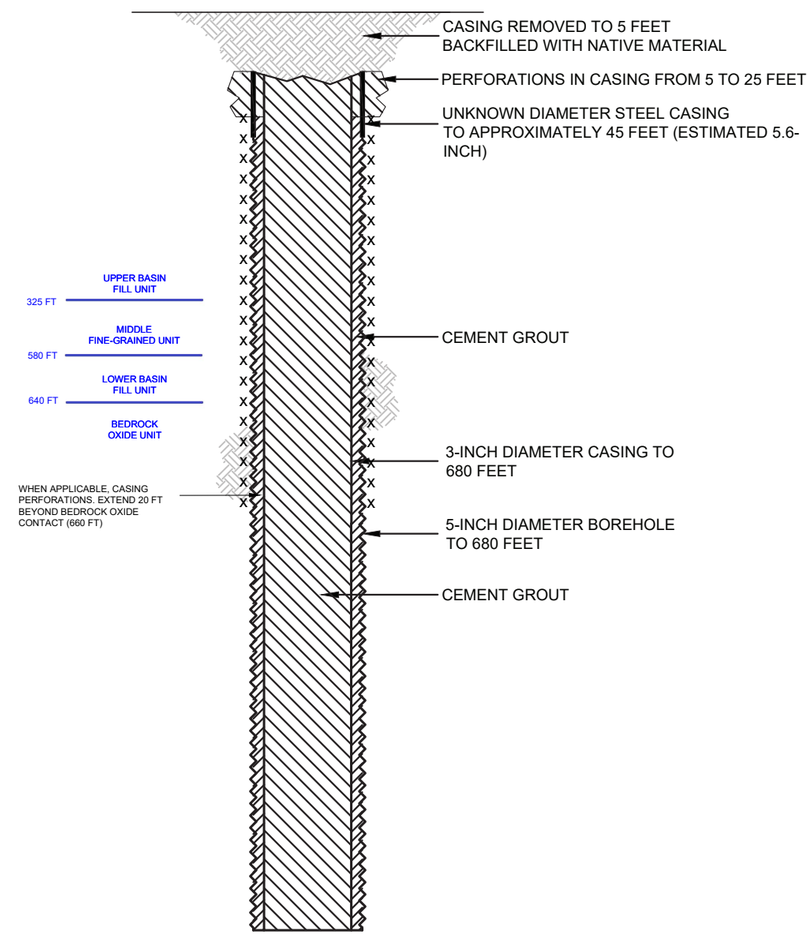
AS-BUILT COREHOLE 440S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 440S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 440S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		441S

State	County
Arizona	Pinal

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

Latitude 33.05273659

Longitude -111.4358365

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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

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Dan Johnson, VP - General Manager		10/3/2019

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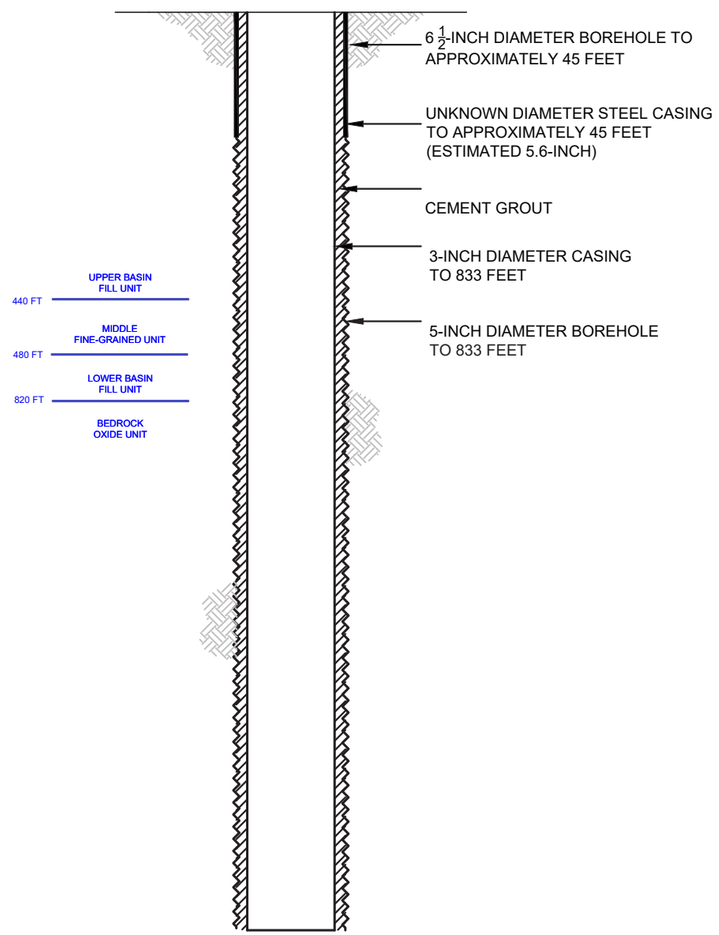
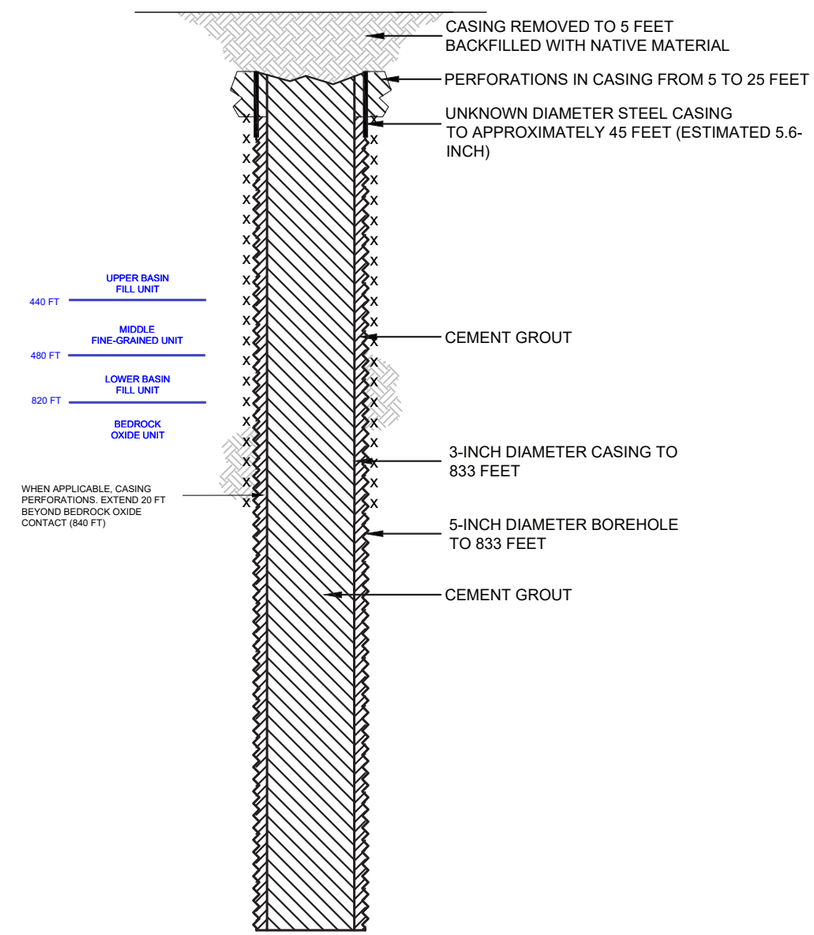
AS-BUILT COREHOLE 441S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 441S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 441S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		442S

State	County
Arizona	Pinal

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

Latitude 33.05273973

Longitude -111.4366524

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

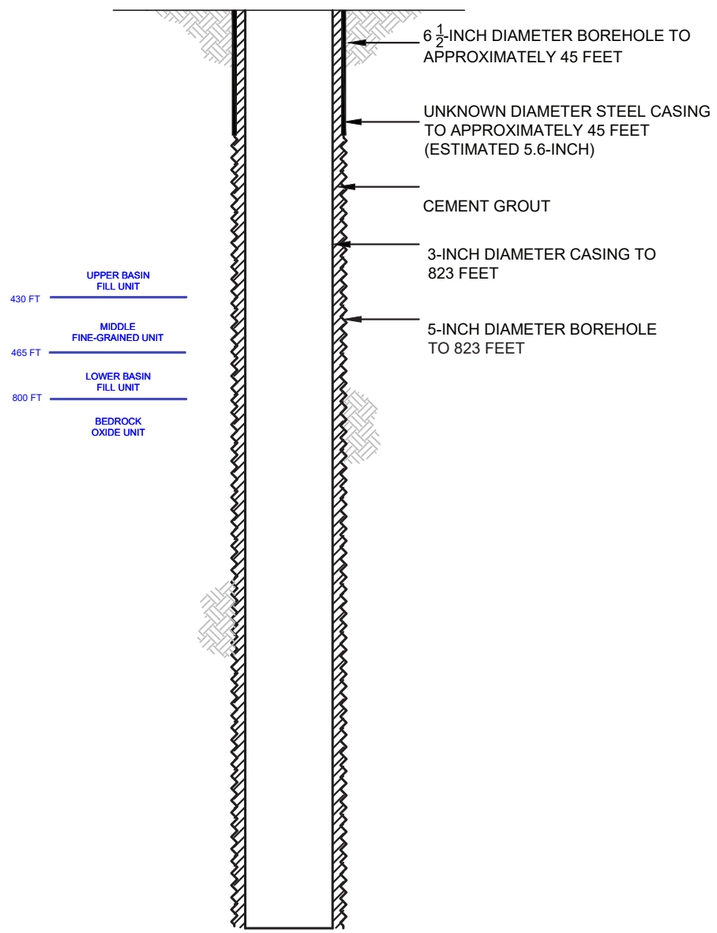
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

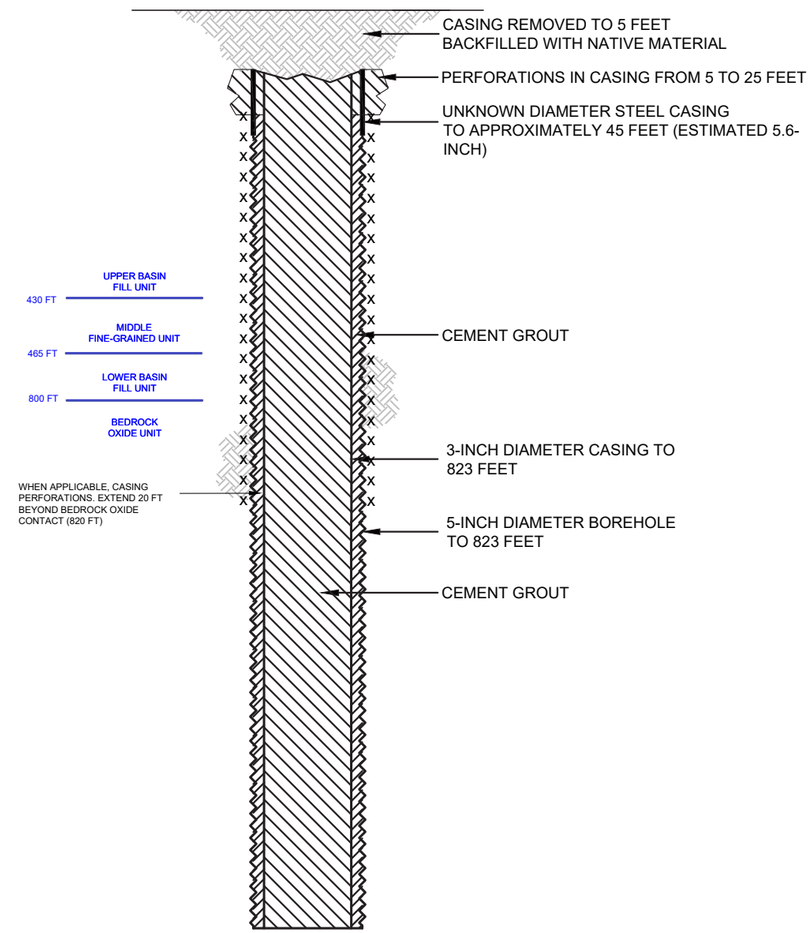
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 442S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 442S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 442S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		443S

State	County
Arizona	Pinal

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

Latitude 33.05274287

Longitude -111.4374683

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

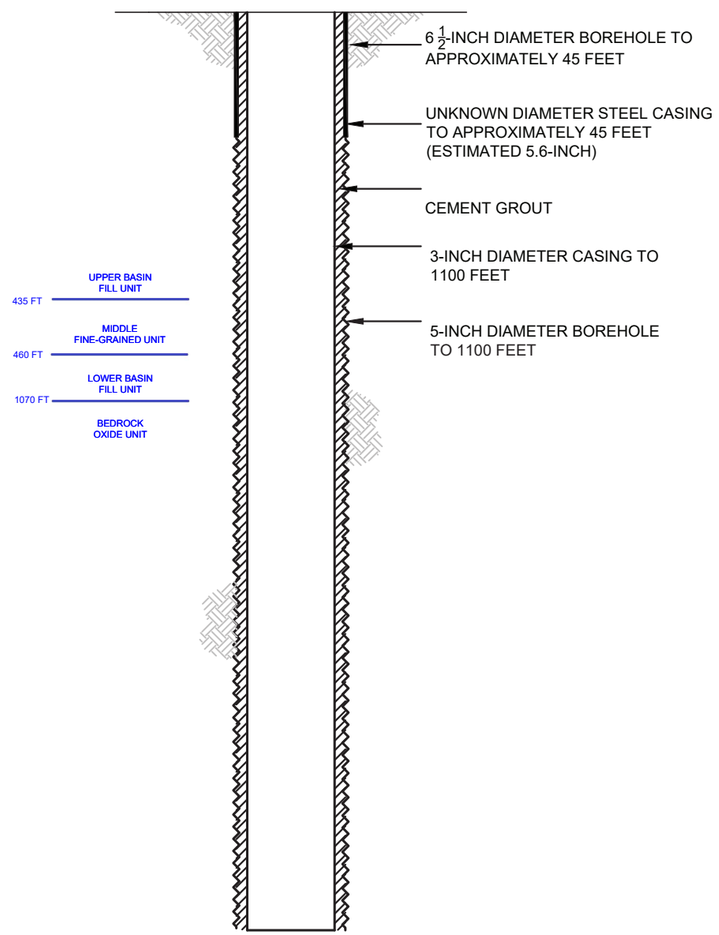
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

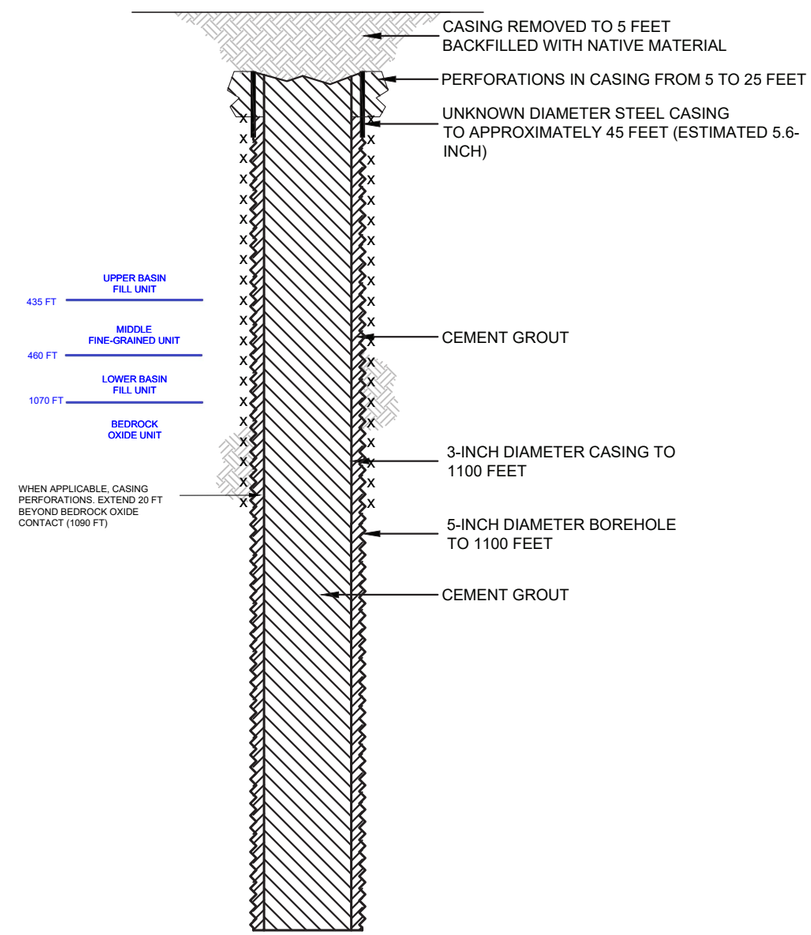
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 443S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 443S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 443S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		445S

State	County
Arizona	Pinal

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

Latitude 33.0521431

Longitude -111.4362477

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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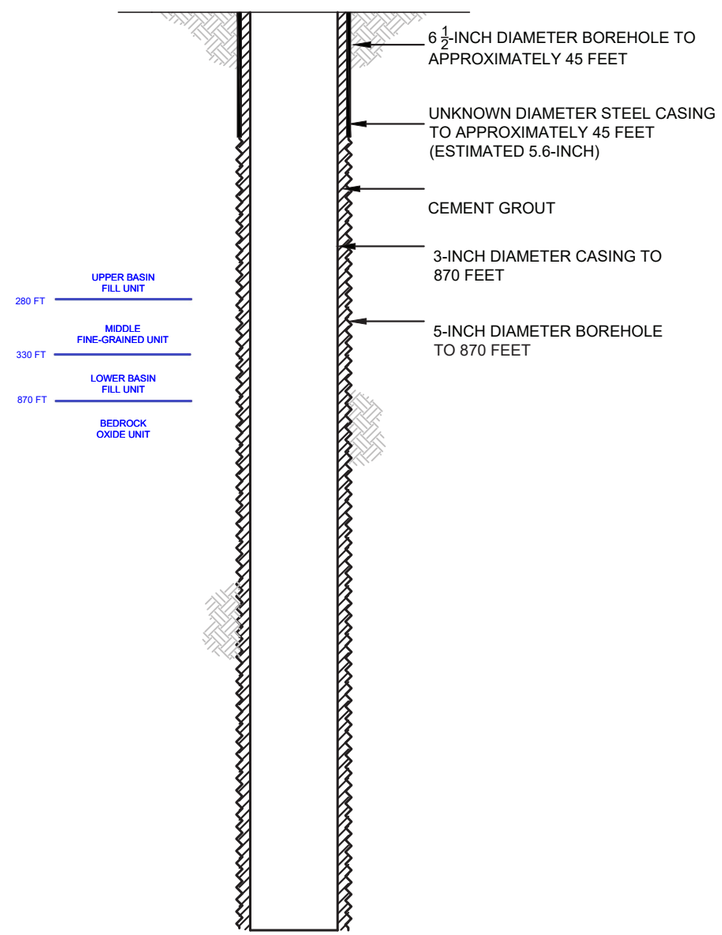
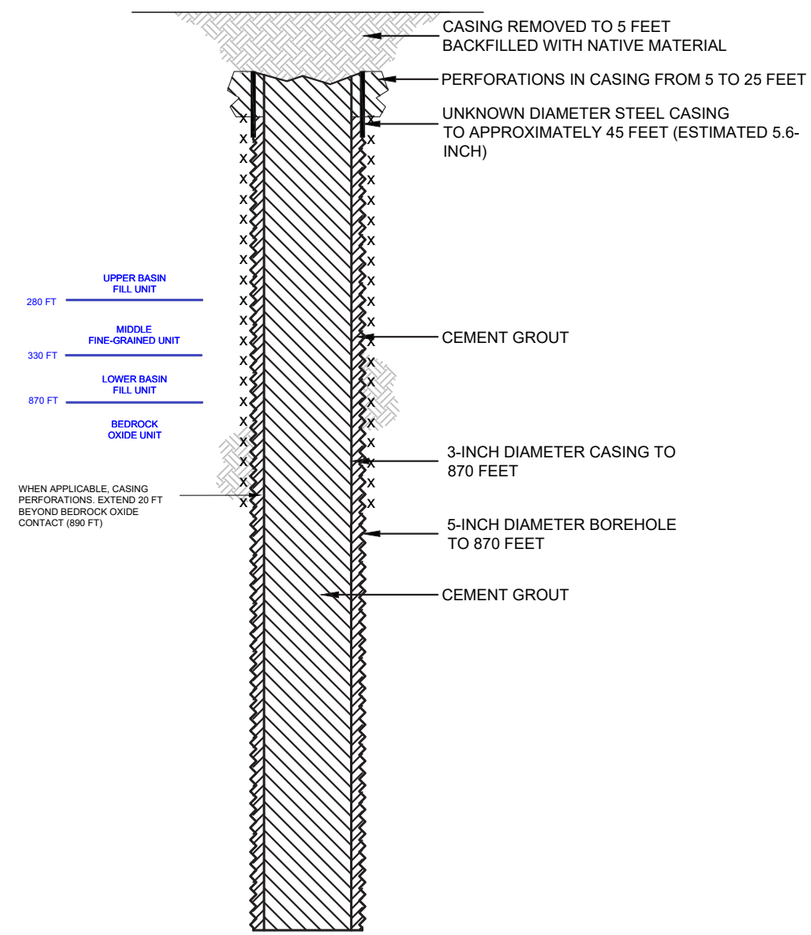
AS-BUILT COREHOLE 445S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 445S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 445S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		446S

State	County
Arizona	Pinal

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

Latitude 33.0521368

Longitude -111.4346159

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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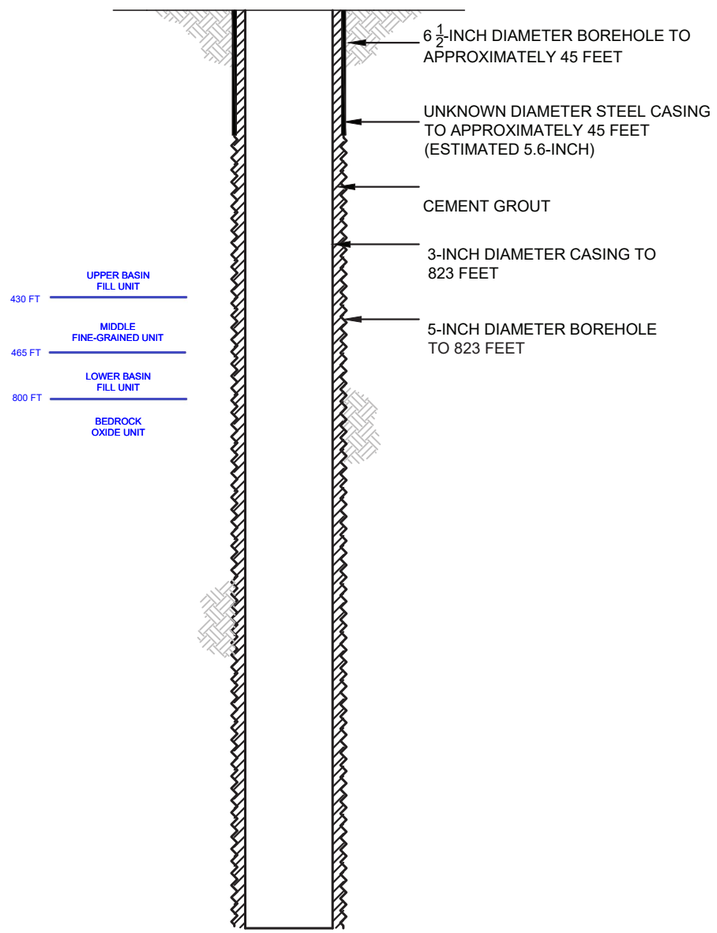
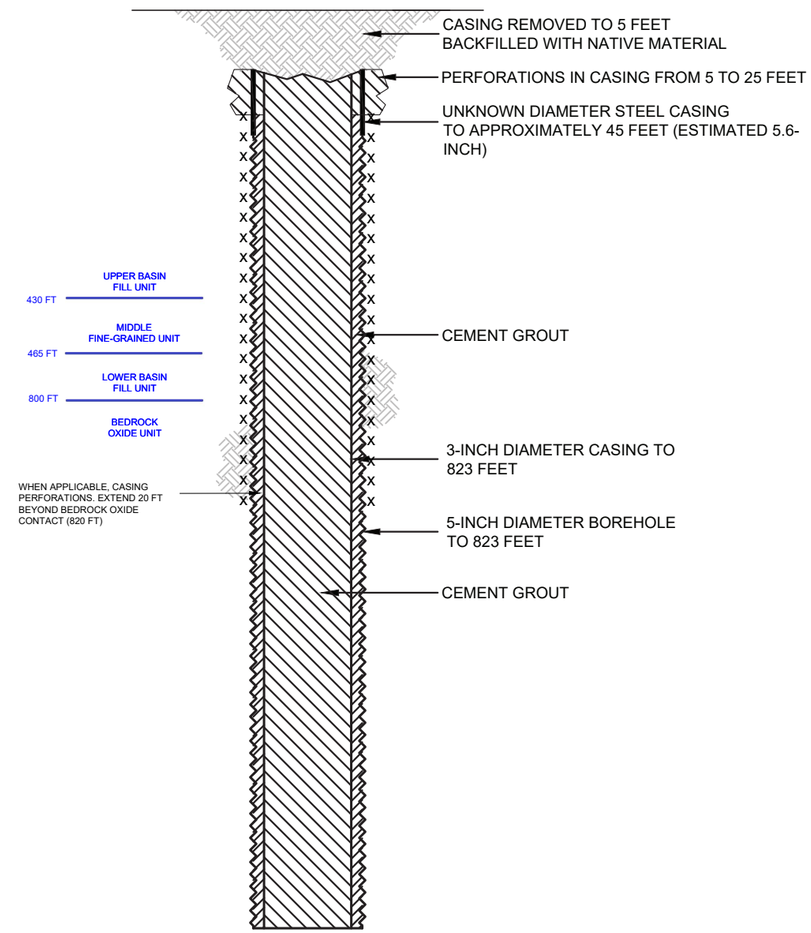
AS-BUILT COREHOLE 442S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 442S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 442S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		449S

State	County
Arizona	Pinal

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

Latitude 33.05154509

Longitude -111.435843

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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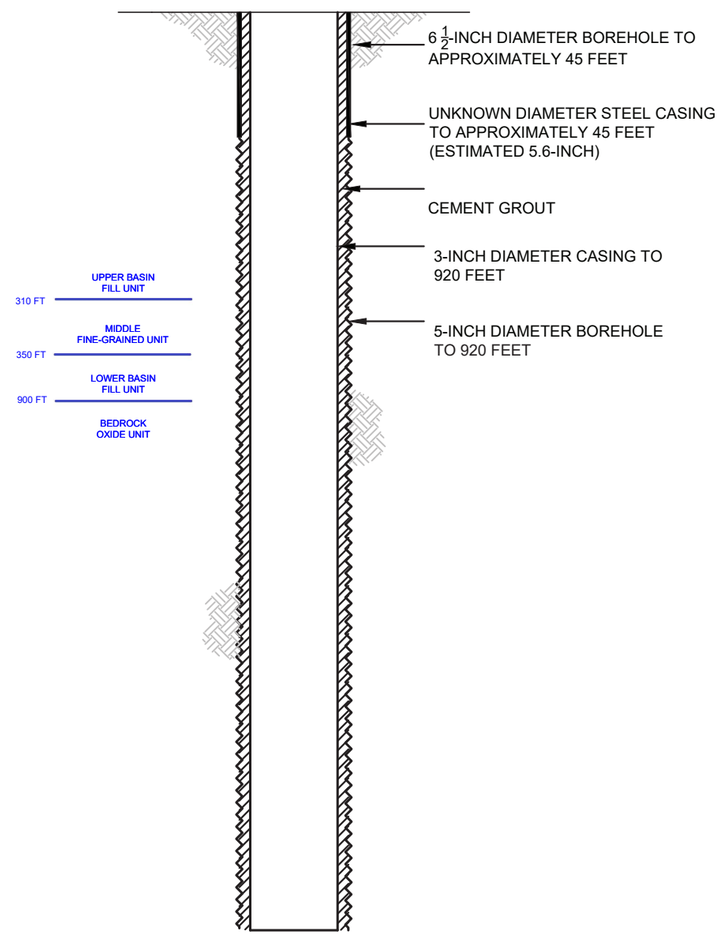
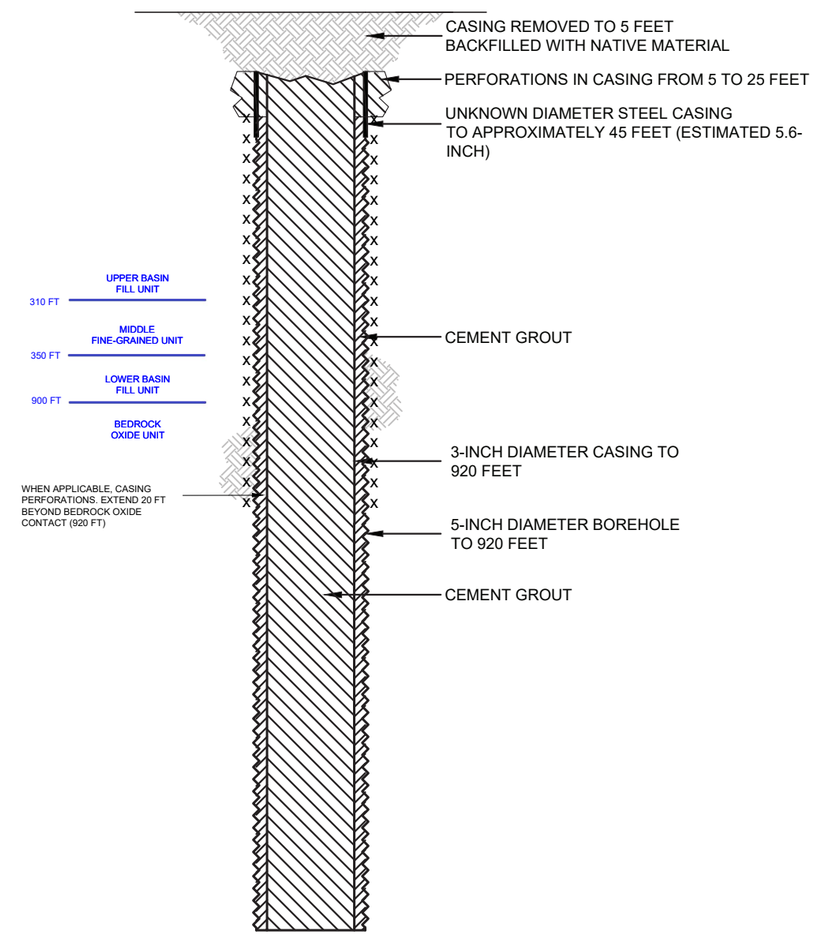
AS-BUILT COREHOLE 449S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 449S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 449S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		450S

State	County
Arizona	Pinal

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

Latitude 33.05154823

Longitude -111.4366588

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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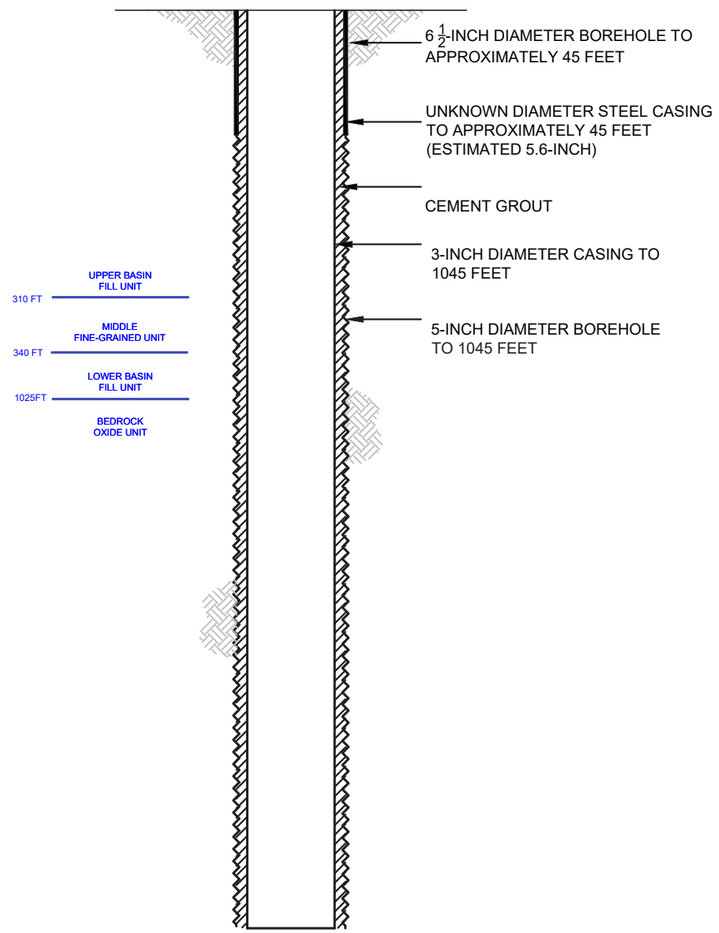
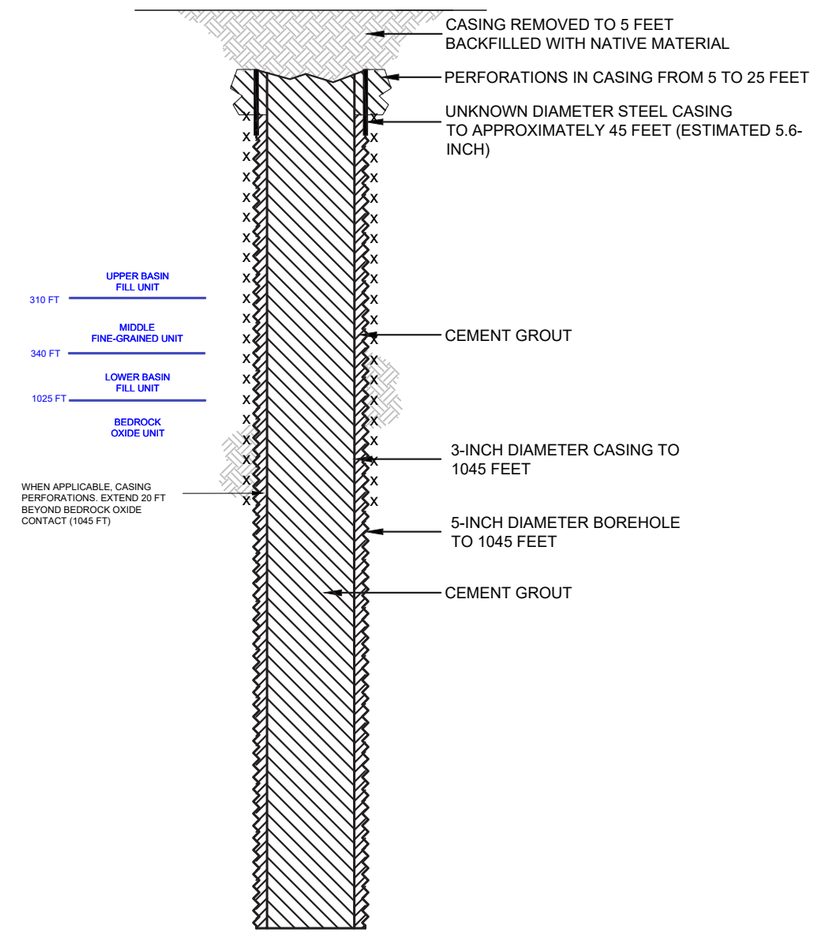
AS-BUILT COREHOLE 450S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 450S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 450S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		451S

State	County
Arizona	Pinal

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

Latitude 33.05155137

Longitude -111.4374747

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

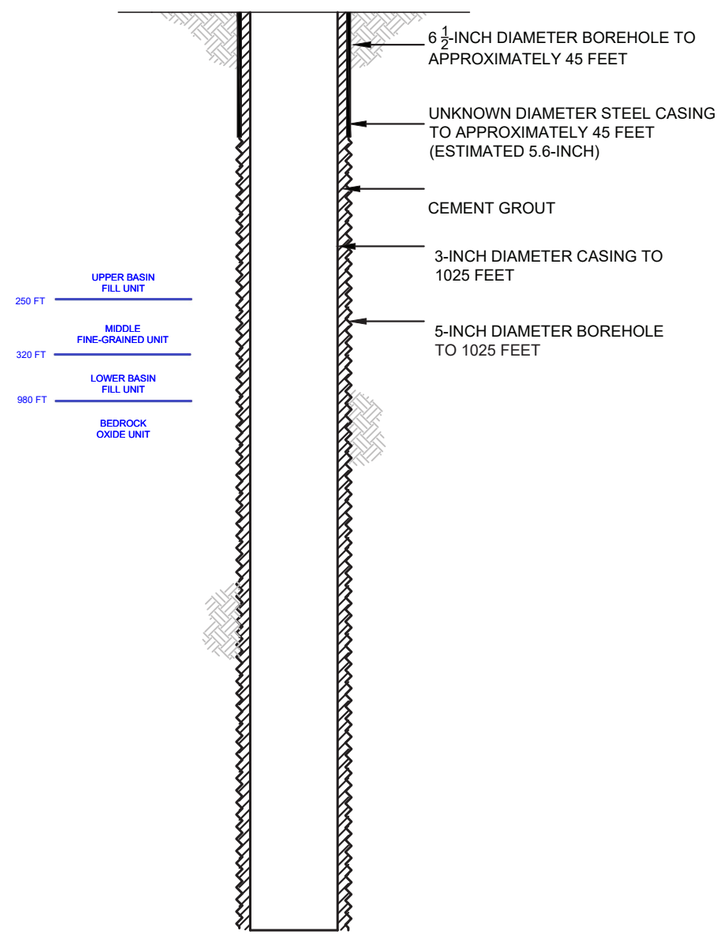
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

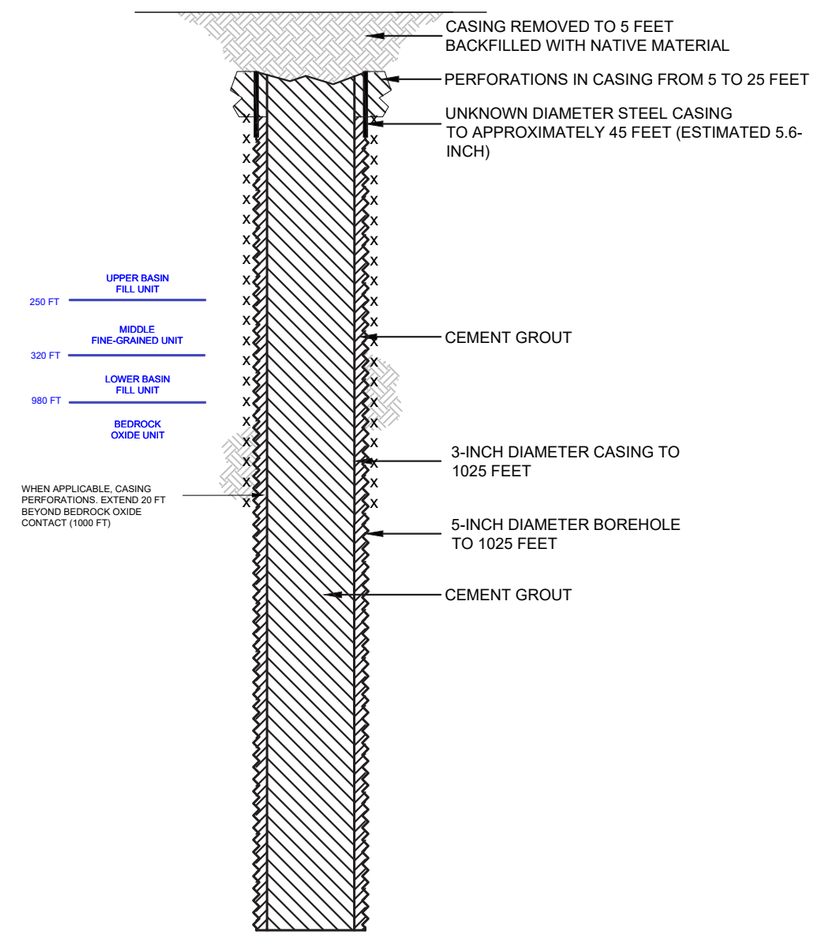
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 451S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 451S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 451S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		452S

State	County
Arizona	Pinal

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

Latitude 33.05095611

Longitude -111.43707

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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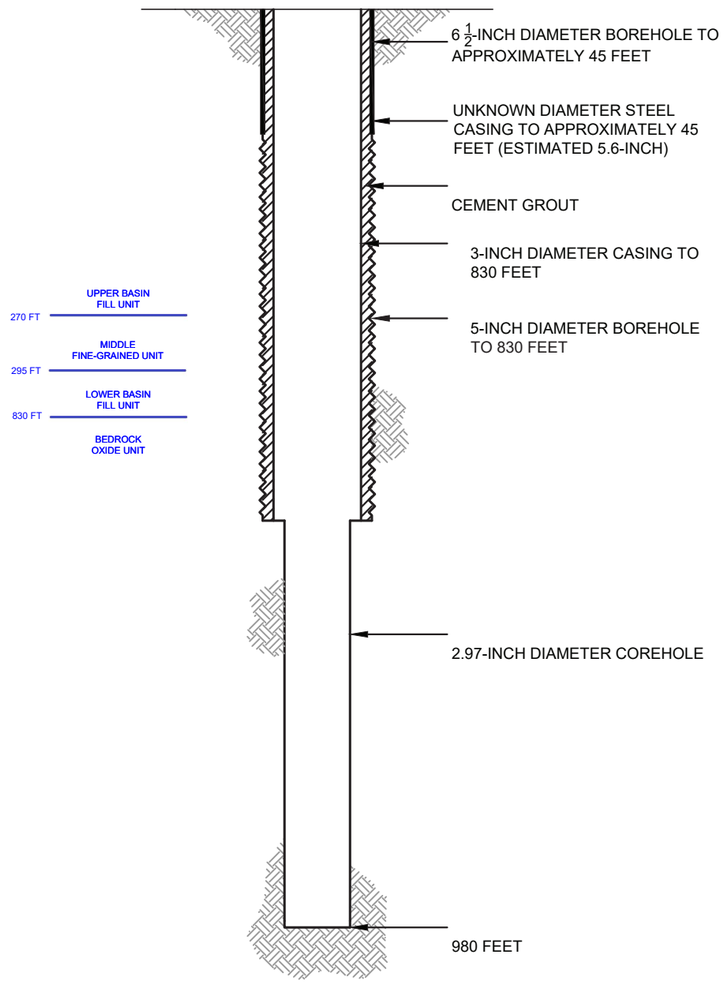
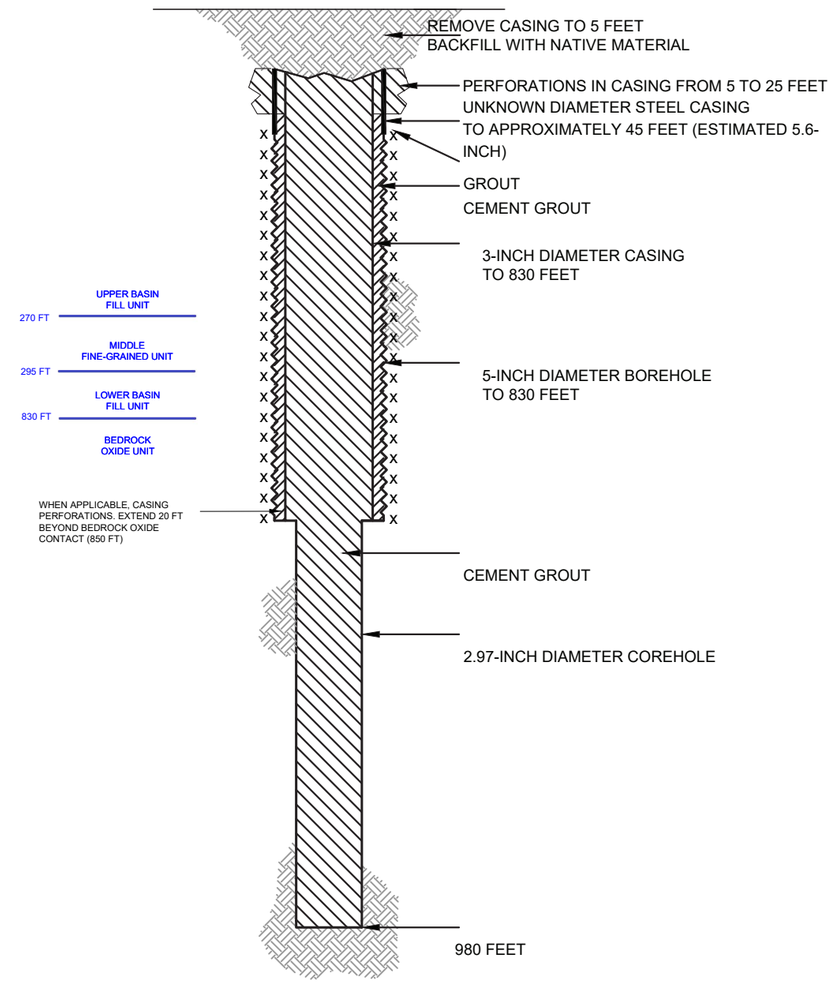
AS-BUILT COREHOLE 452S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 452S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 452S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		457S

State	County
Arizona	Pinal

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

Latitude 33.05035948

Longitude -111.4366653

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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Name and Official Title *(Please type or print)*	Signature	Date Signed
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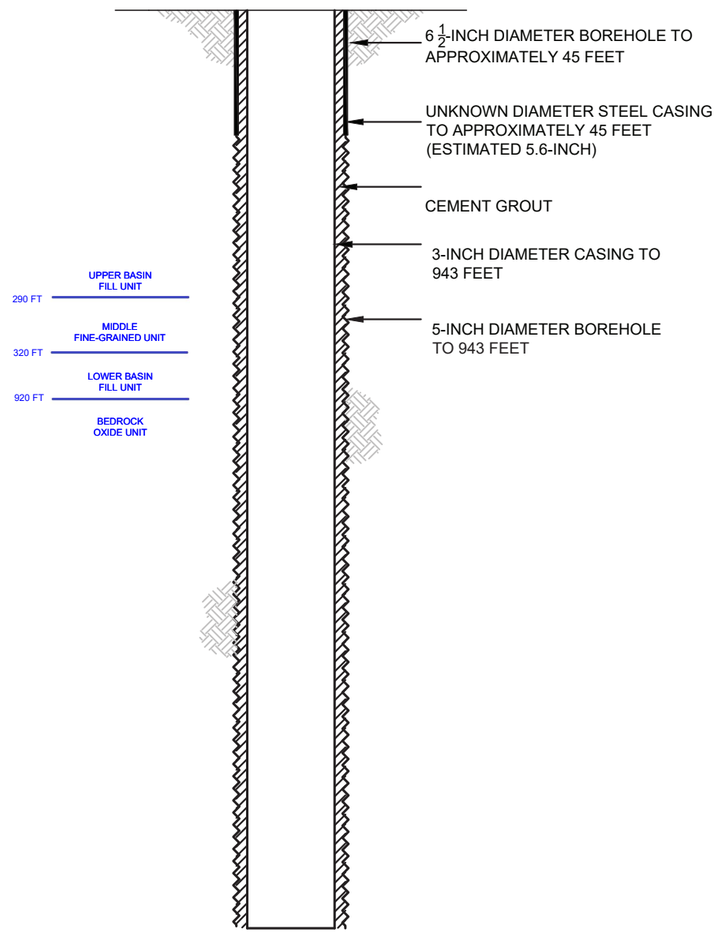
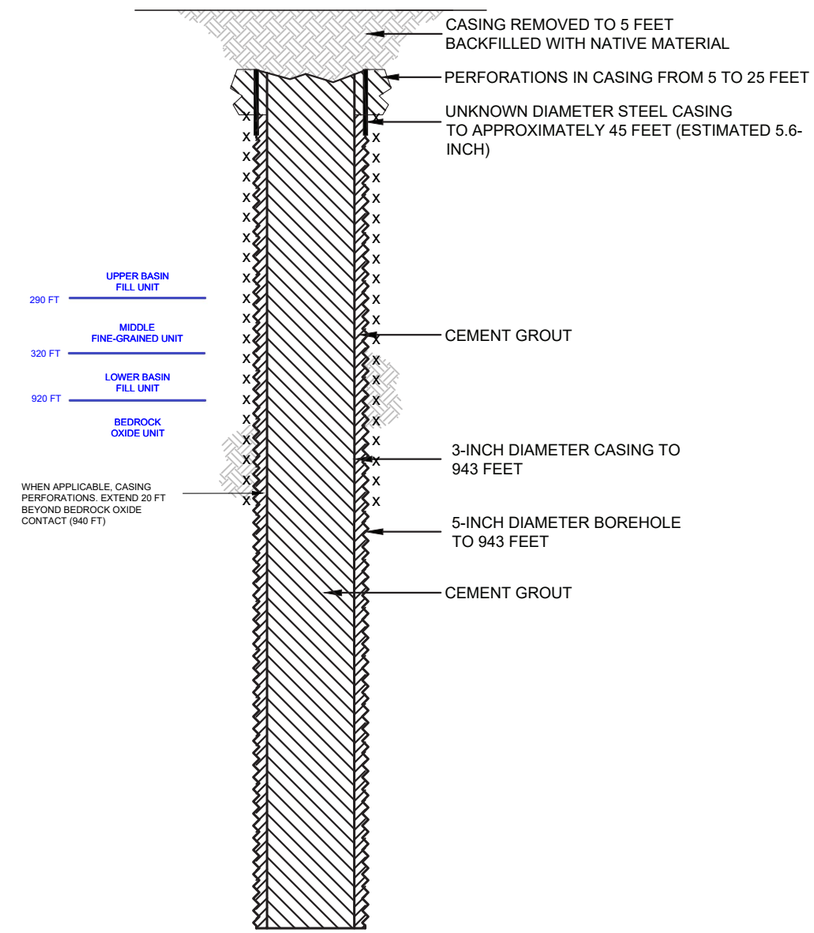
AS-BUILT COREHOLE 457S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 457S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 457S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		458S

State	County
Arizona	Pinal

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

Latitude 33.04976285

Longitude -111.4362606

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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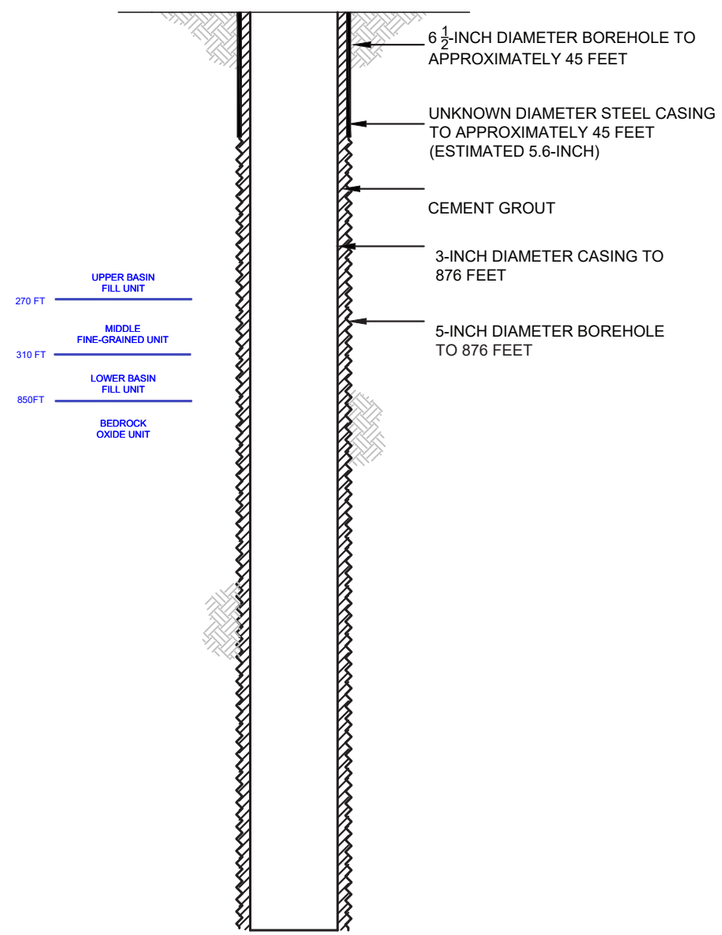
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

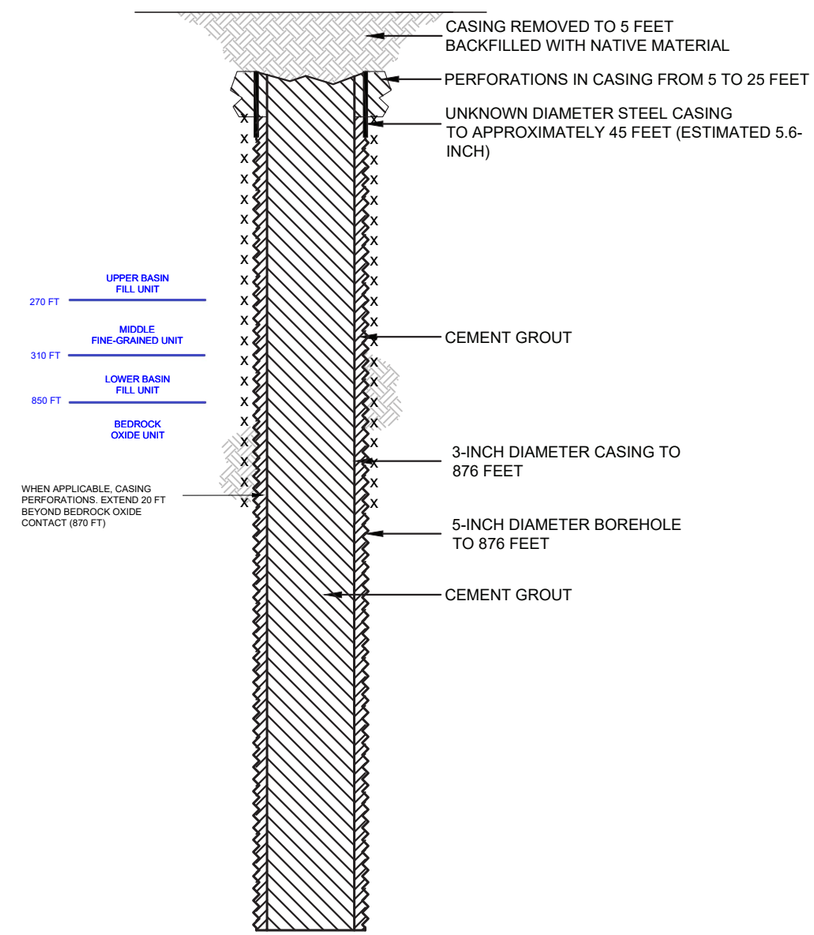
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE 458S



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 458S



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 458S DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		482MF

State	County
Arizona	Pinal

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

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.0454527

Longitude -111.4309963

_____ ft. from (N/S) _____ Line of quarter section

_____ ft. from (E/W) _____ Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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Dan Johnson, VP - General Manager		10/3/2019

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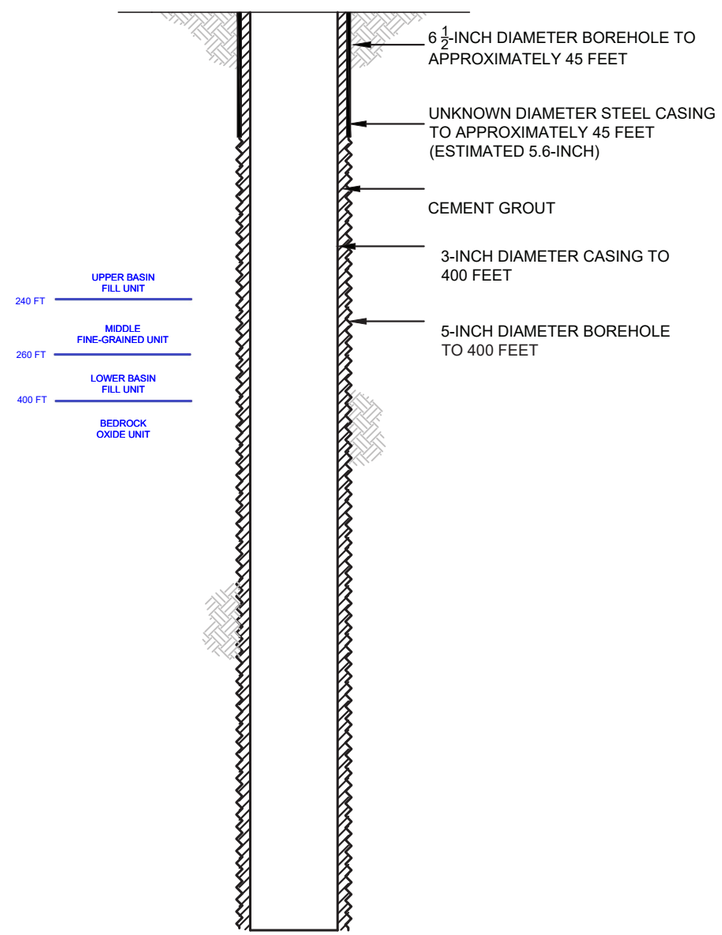
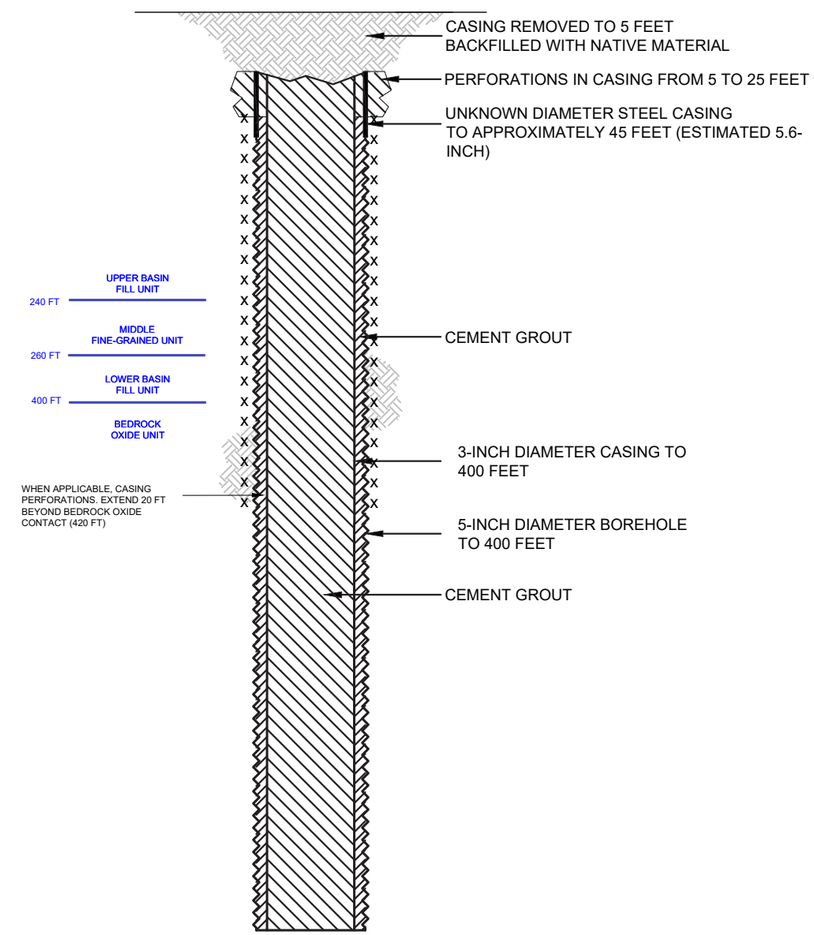
AS-BUILT COREHOLE 482MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 482MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 482MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Florence Copper Project
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Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		483MF

State	County
Arizona	Pinal

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

Latitude 33.04559302

Longitude -111.4318114

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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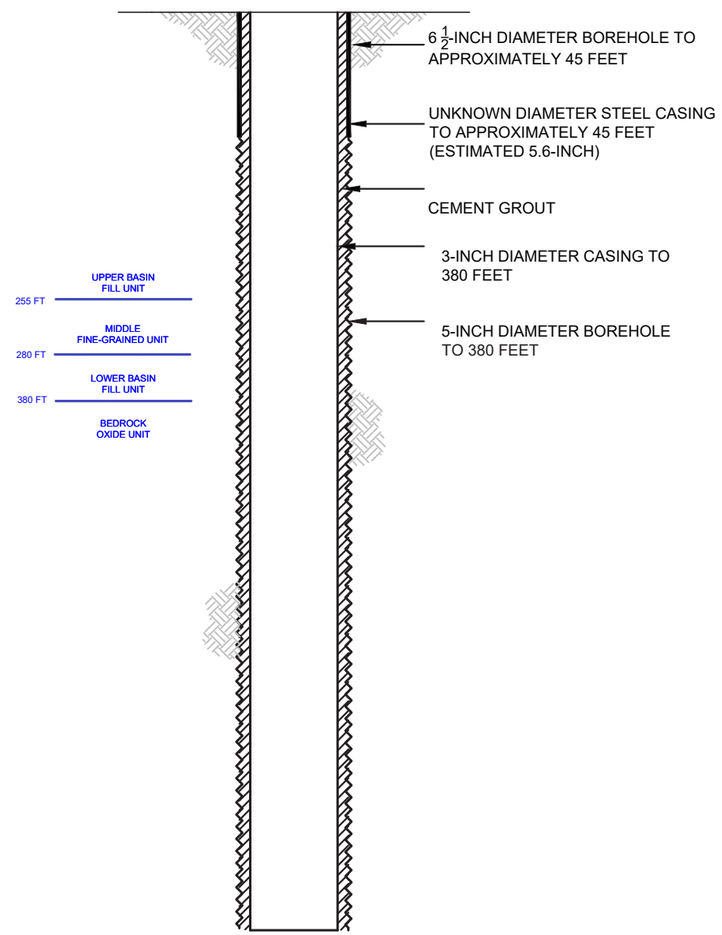
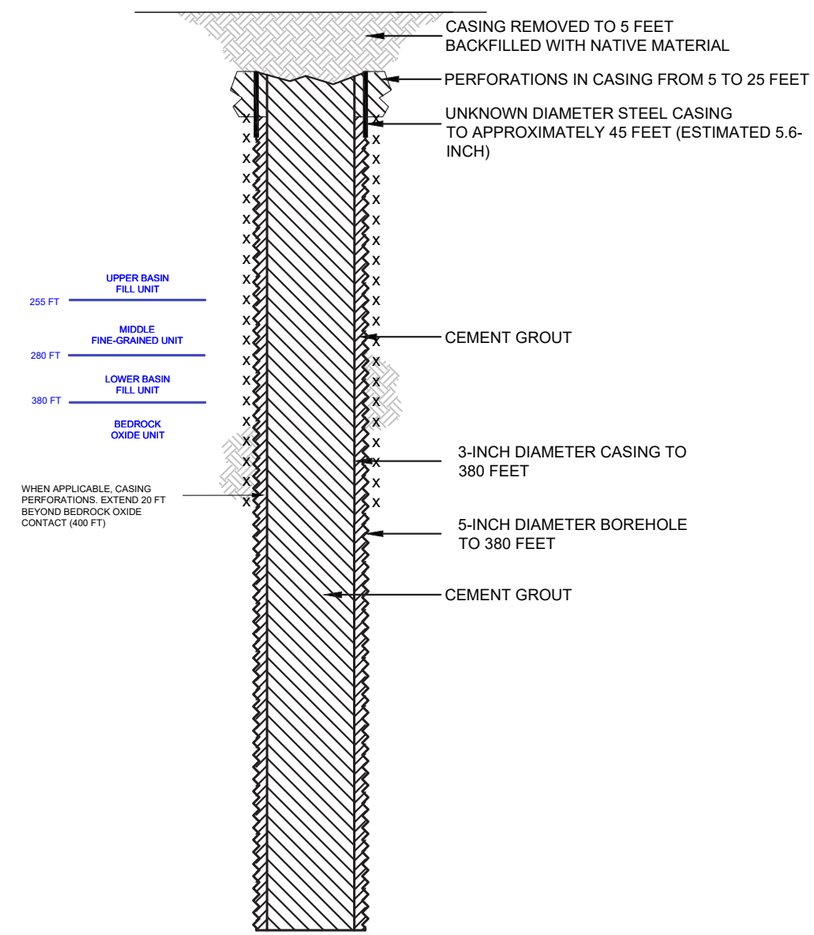
AS-BUILT COREHOLE 483MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 483MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 483MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		484MF

State	County
Arizona	Pinal

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

Latitude 33.04559619

Longitude -111.4326272

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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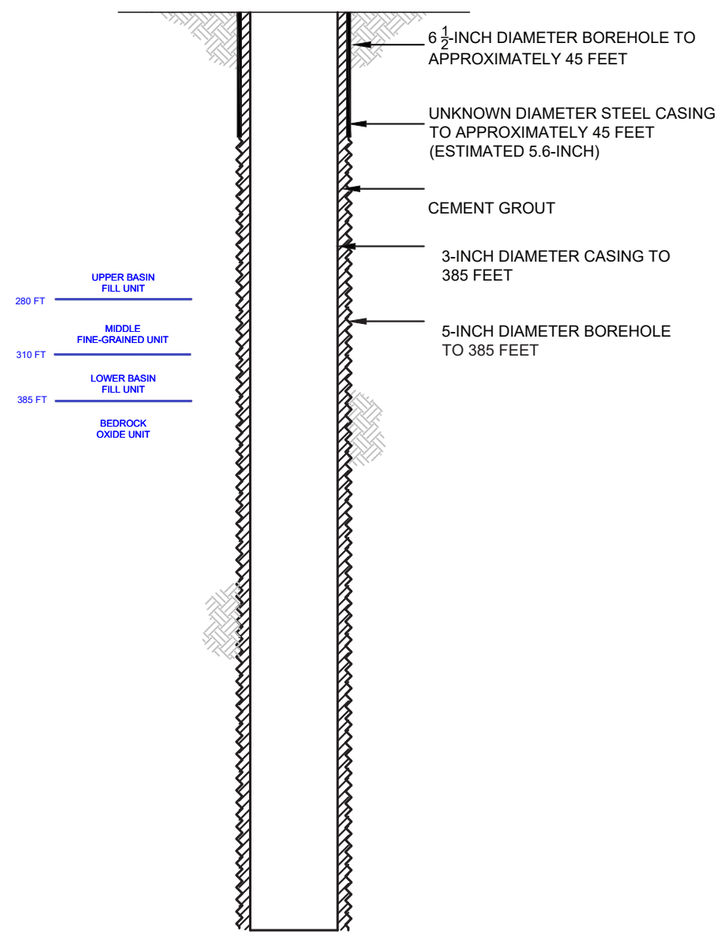
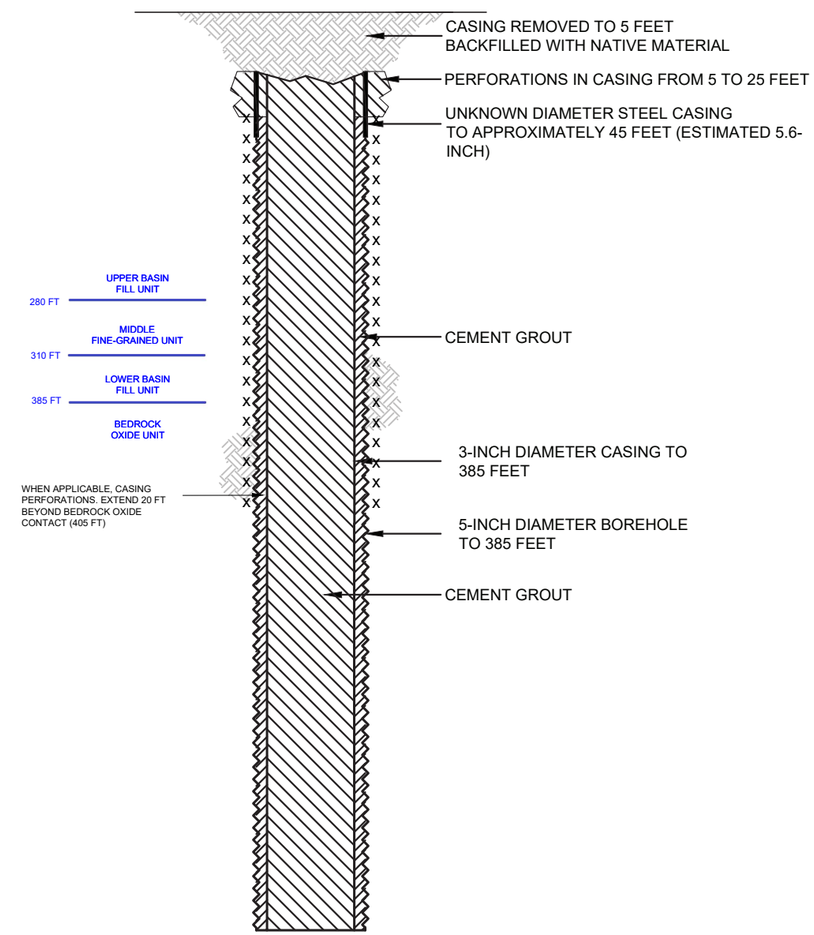
AS-BUILT COREHOLE 484MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 484MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 484MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		485MF

State	County
Arizona	Pinal

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

Latitude 33.04559935

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.433443

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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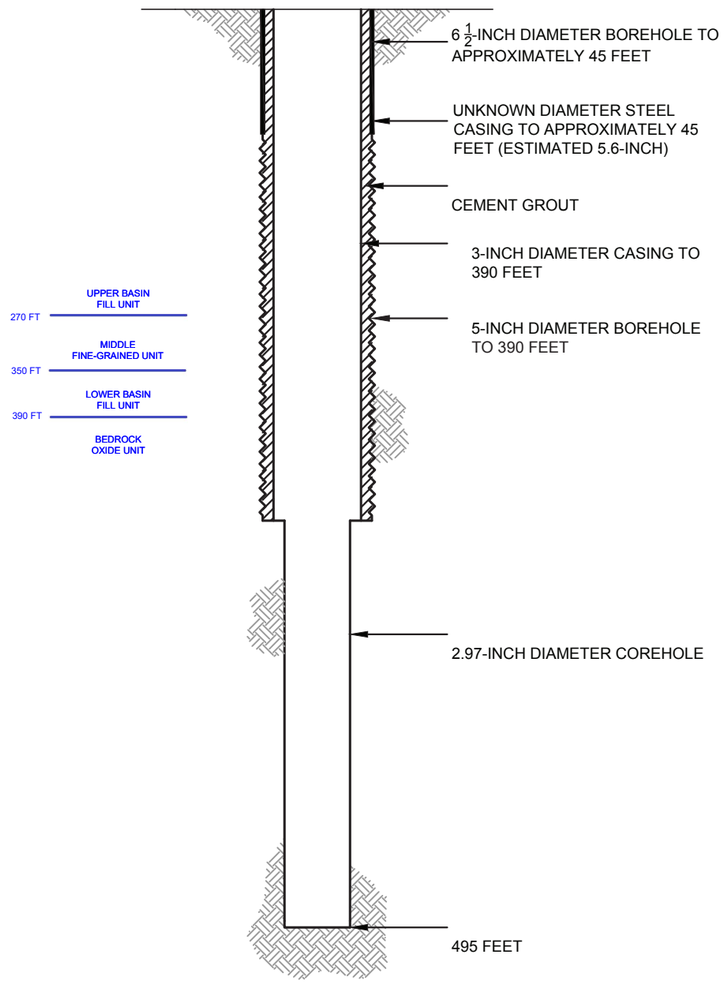
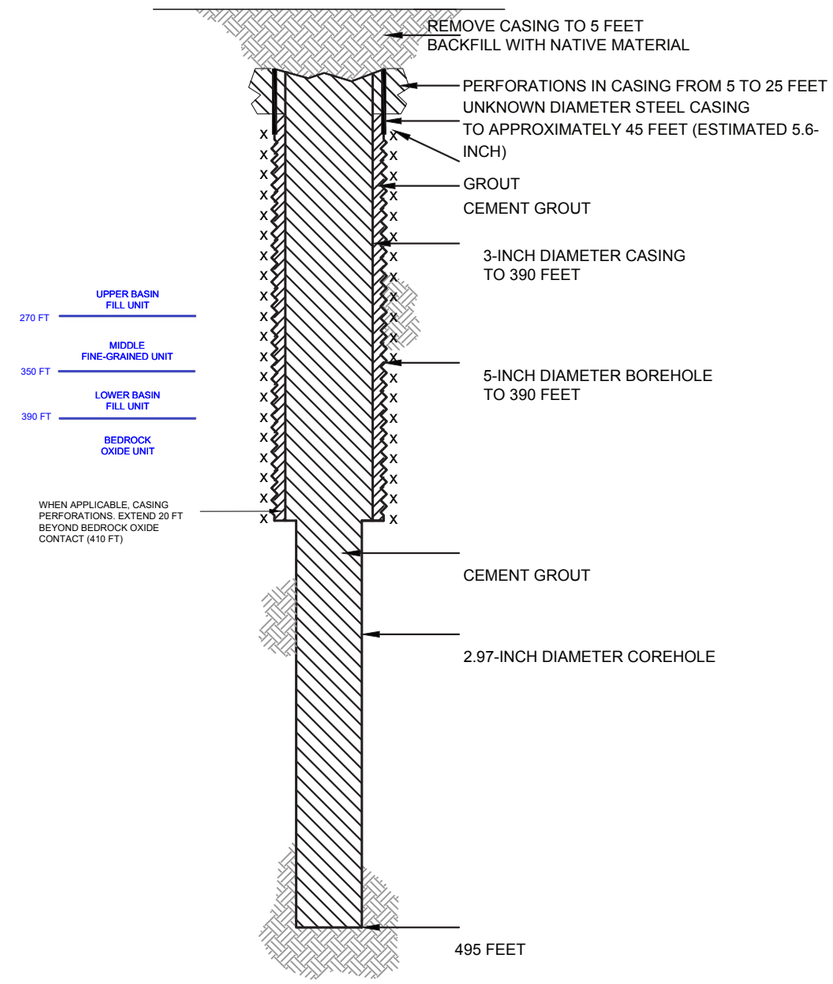


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 485MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 485MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Florence Copper Project
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		486MF

State	County
Arizona	Pinal

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

Latitude 33.04560251

Longitude -111.4342589

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

_____ **ft. from (N/S)** _____ **Line of quarter section**

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TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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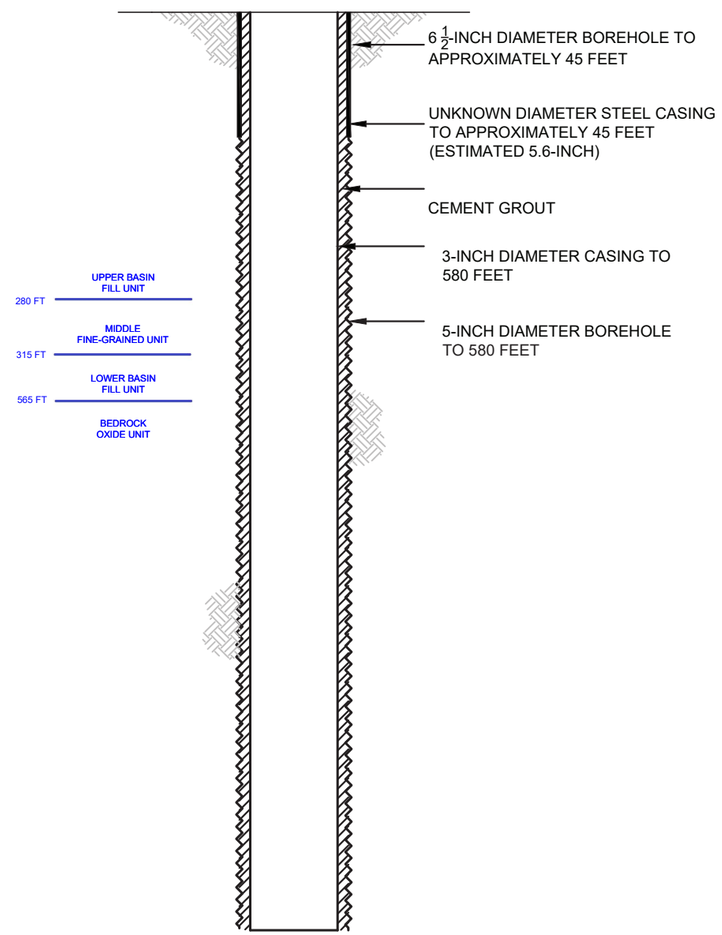
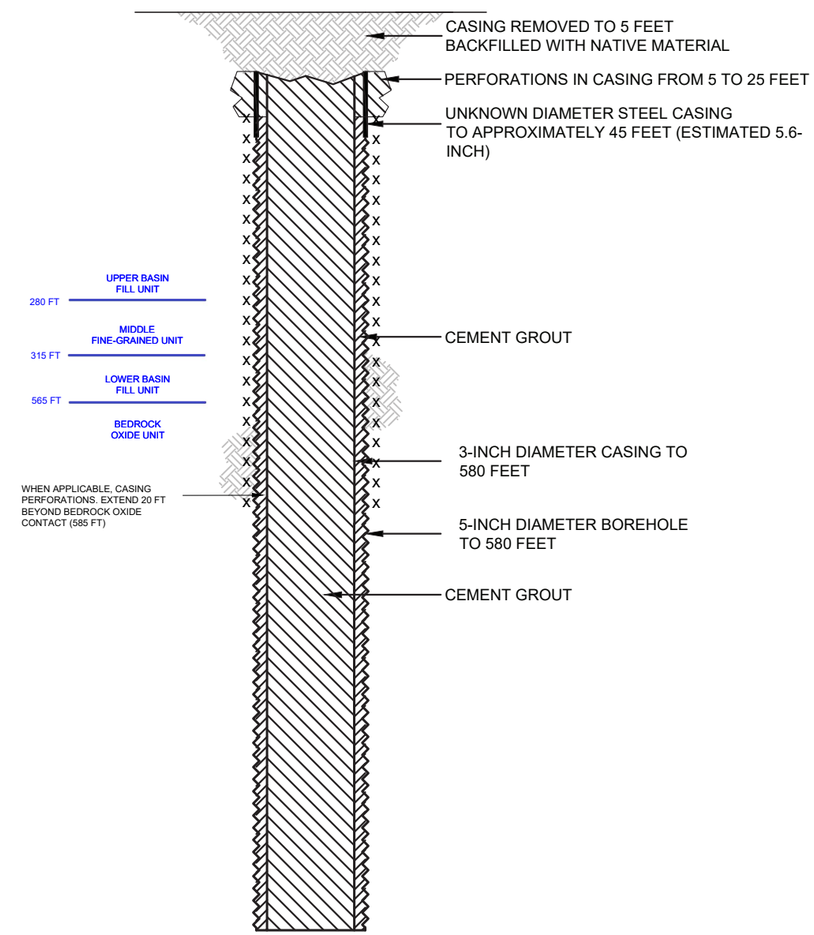
AS-BUILT COREHOLE 486MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 486MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 486MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		487MF

State	County
Arizona	Pinal

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

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04560566

Longitude -111.4350747

_____ ft. from (N/S) _____ Line of quarter section

_____ ft. from (E/W) _____ Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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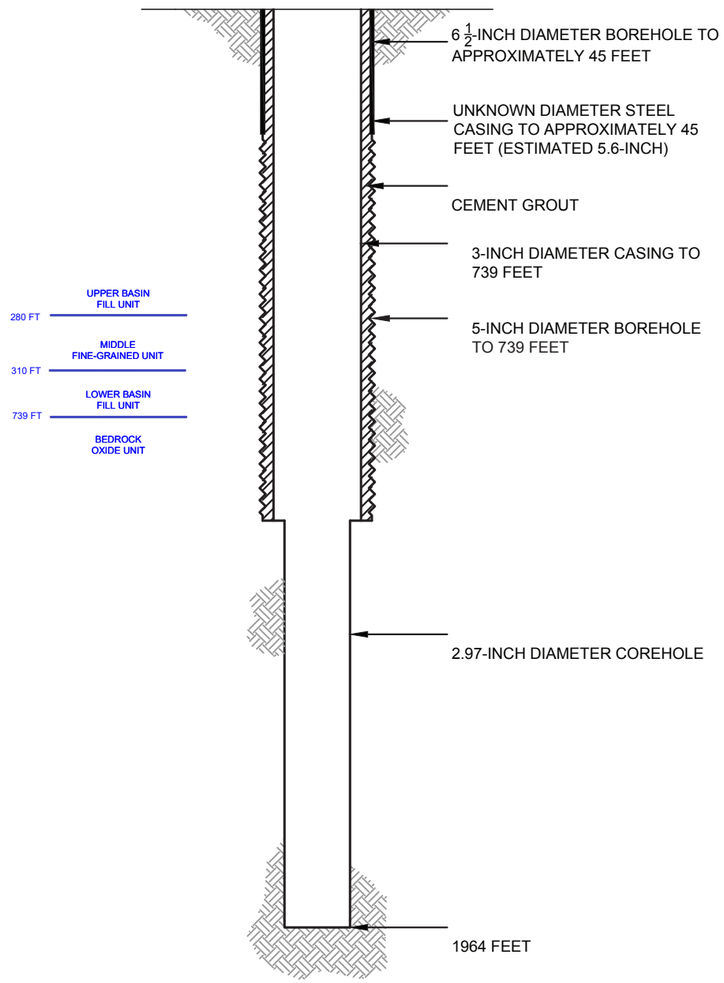
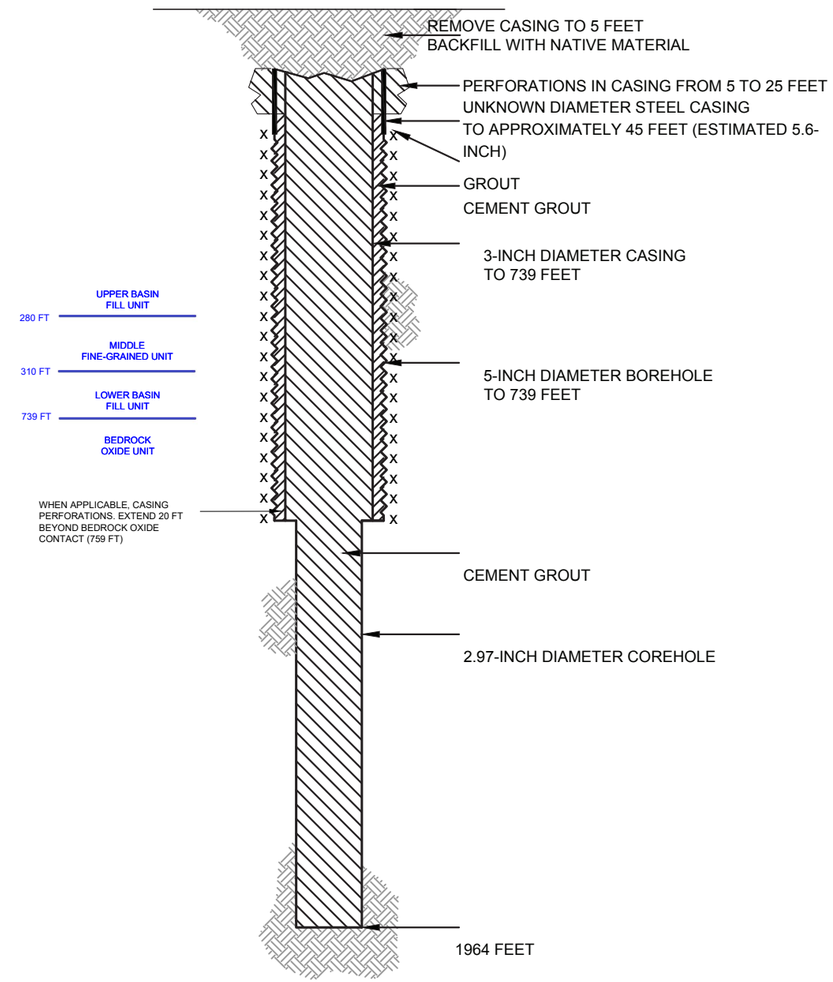
AS-BUILT COREHOLE 487MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 487MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 487MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		488MF

State	County
Arizona	Pinal

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

Latitude 33.04560881

Longitude -111.4358905

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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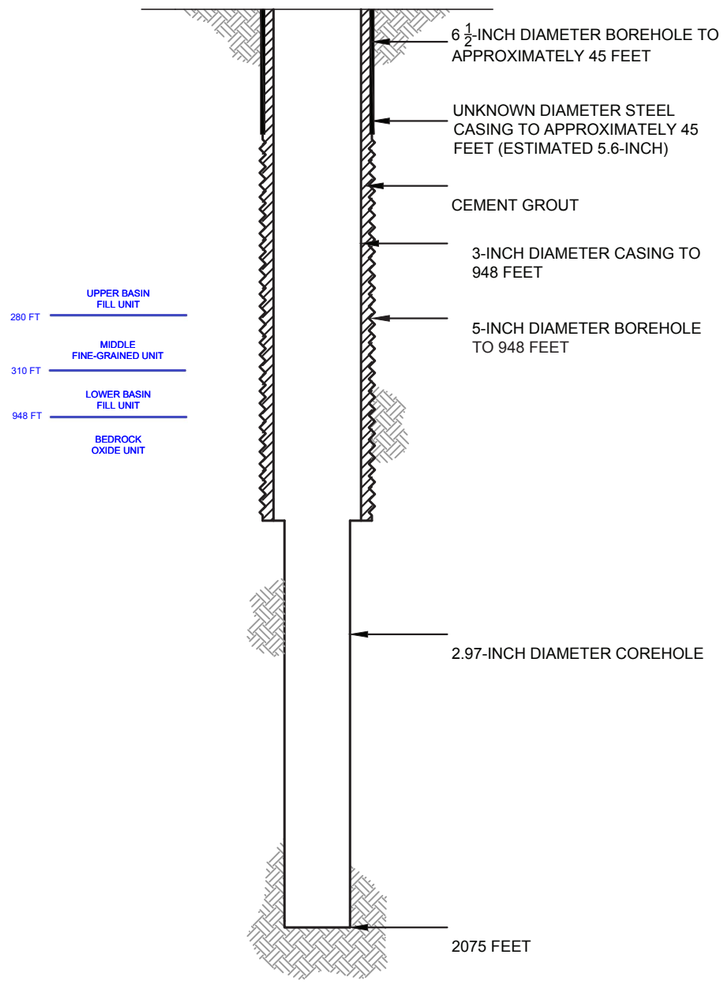
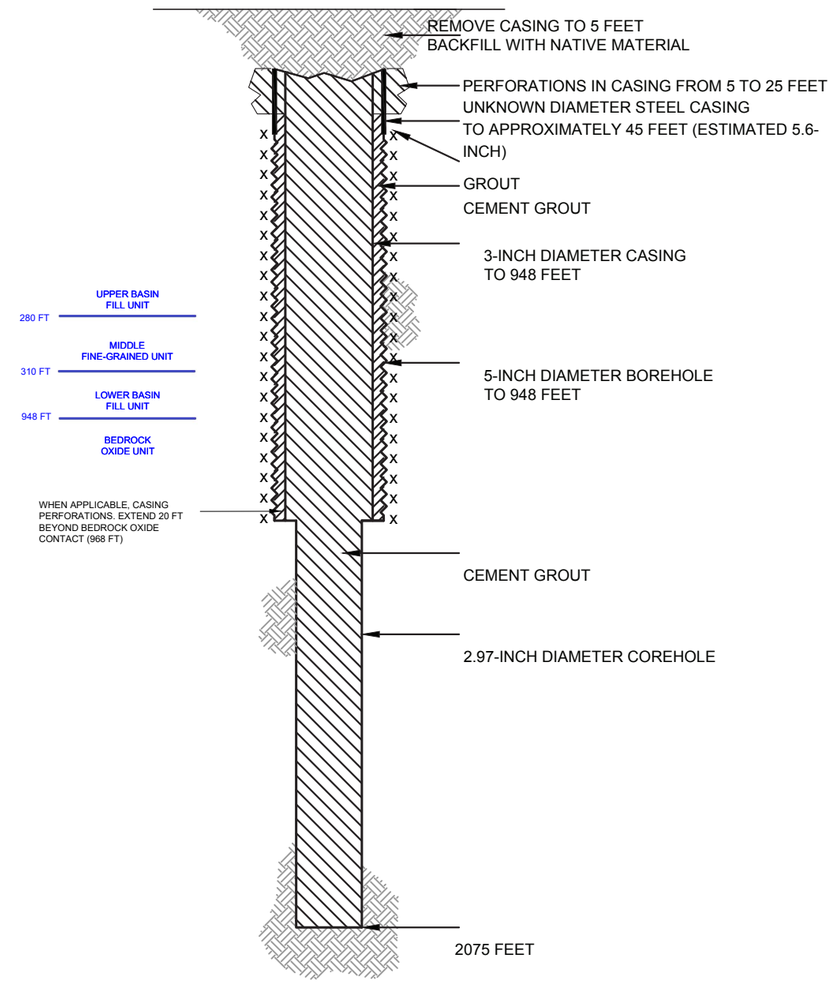
AS-BUILT COREHOLE 488MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 488MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 488MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		489MF

State	County
Arizona	Pinal

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

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04501532

Longitude -111.4363017

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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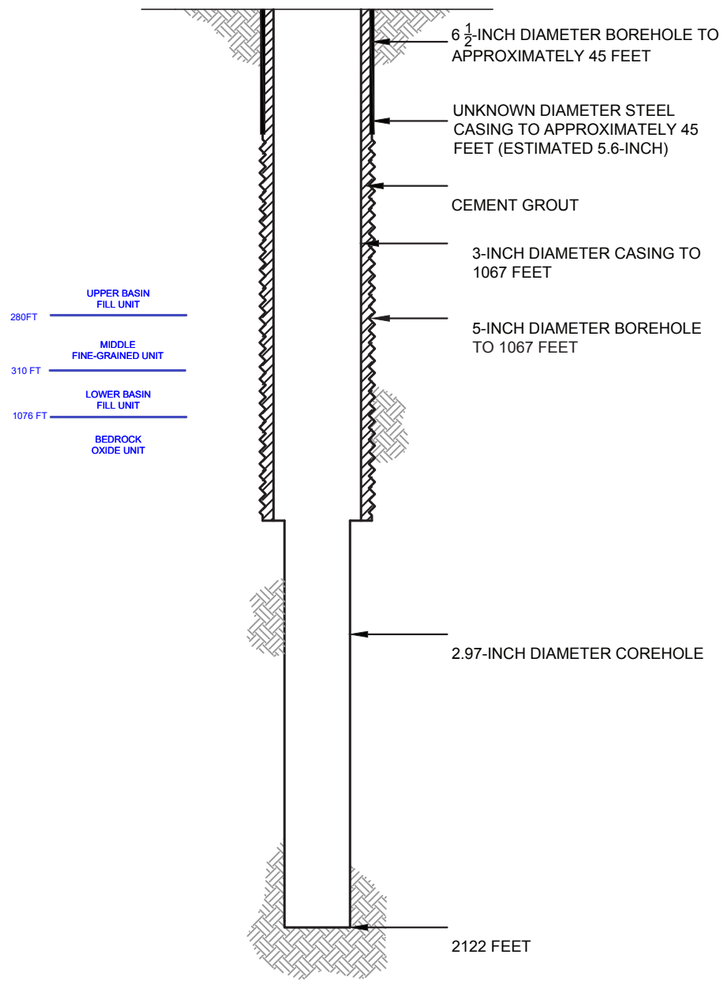
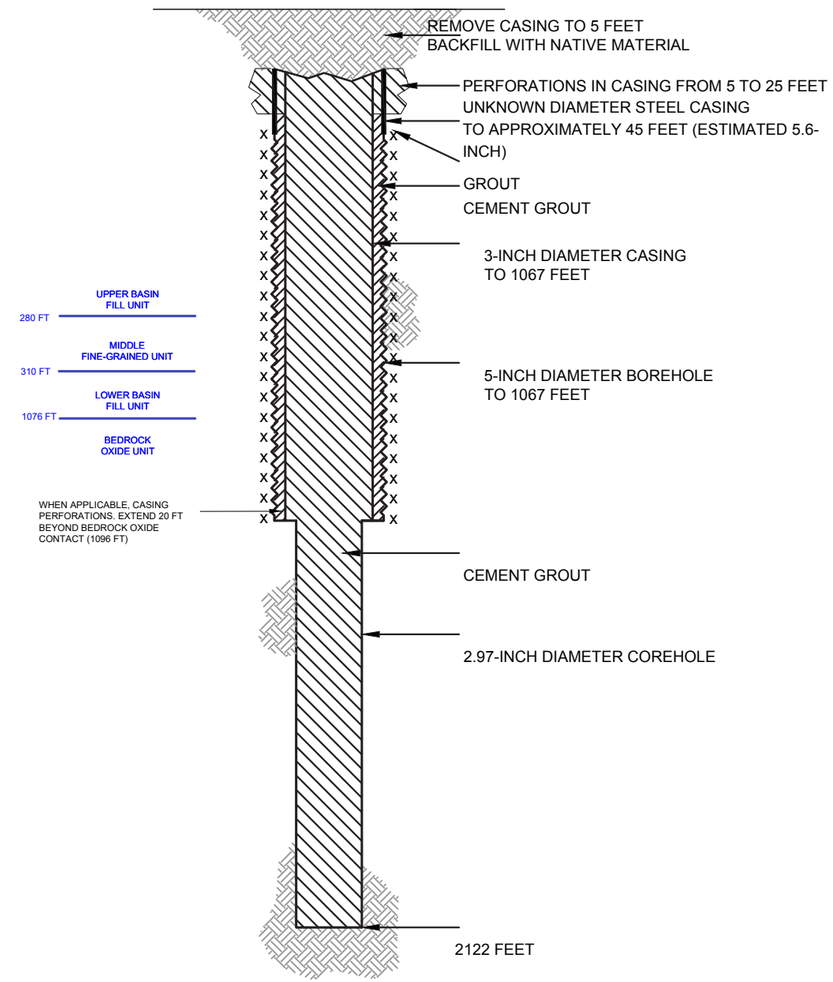
AS-BUILT COREHOLE 489MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 489MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 489MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		490MF

State	County
Arizona	Pinal

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

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04500903

Longitude -111.43467

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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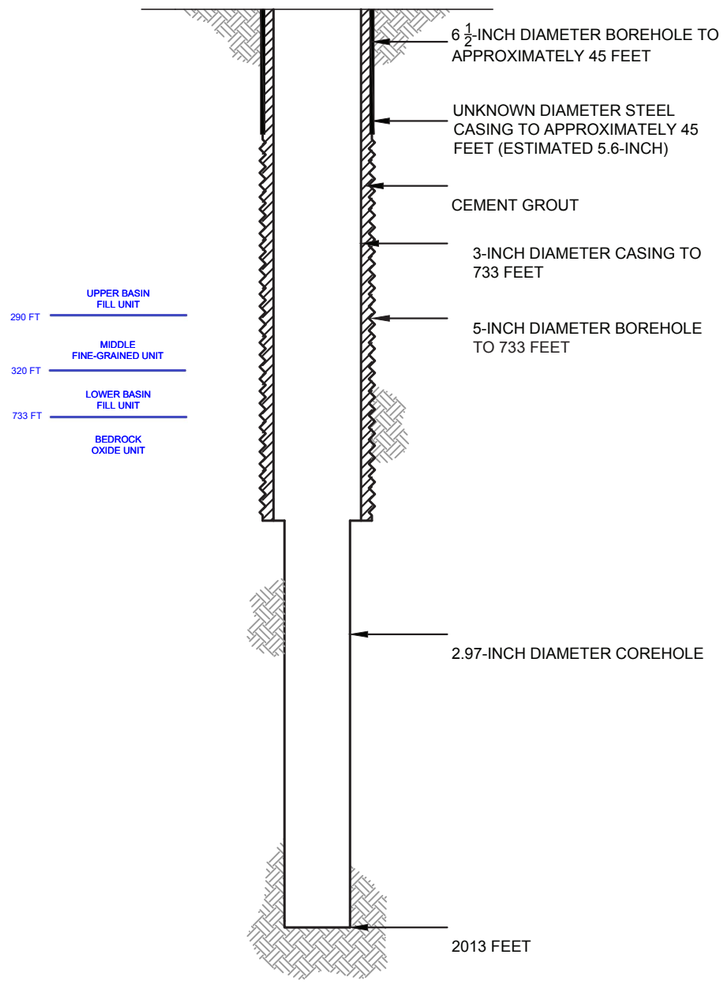
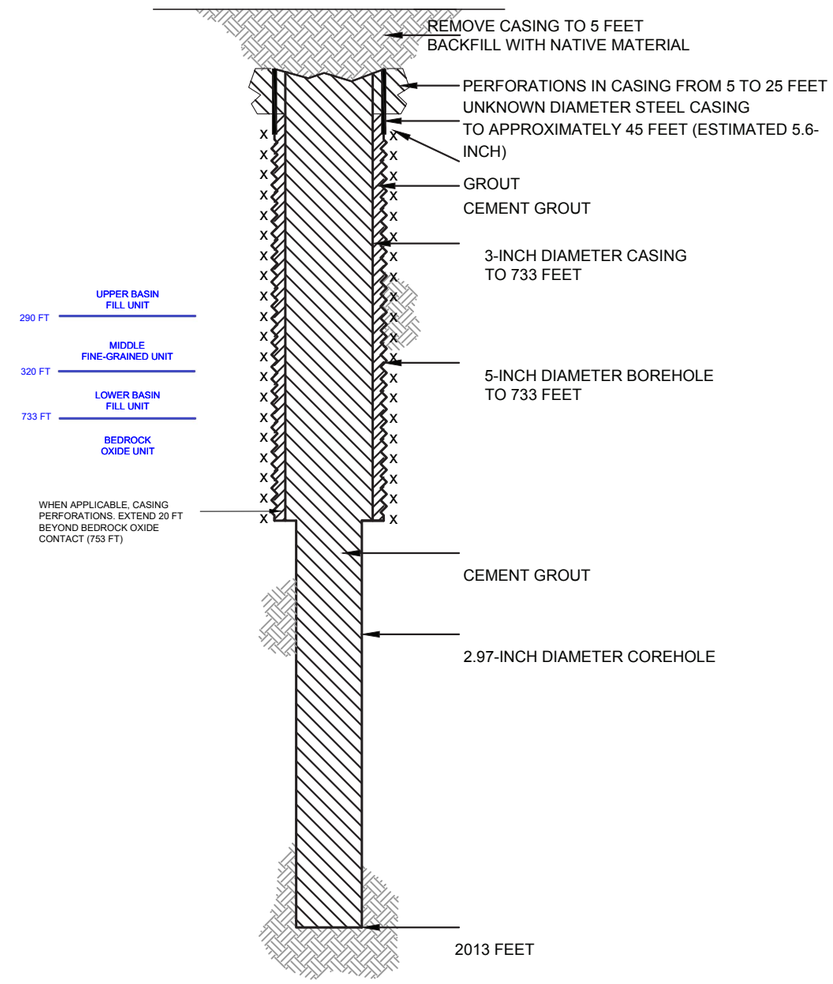
AS-BUILT COREHOLE 490MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 490MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 490MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		491MF

State	County
Arizona	Pinal

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

Latitude 33.04500271

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4330384

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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Dan Johnson, VP - General Manager		10/3/2019

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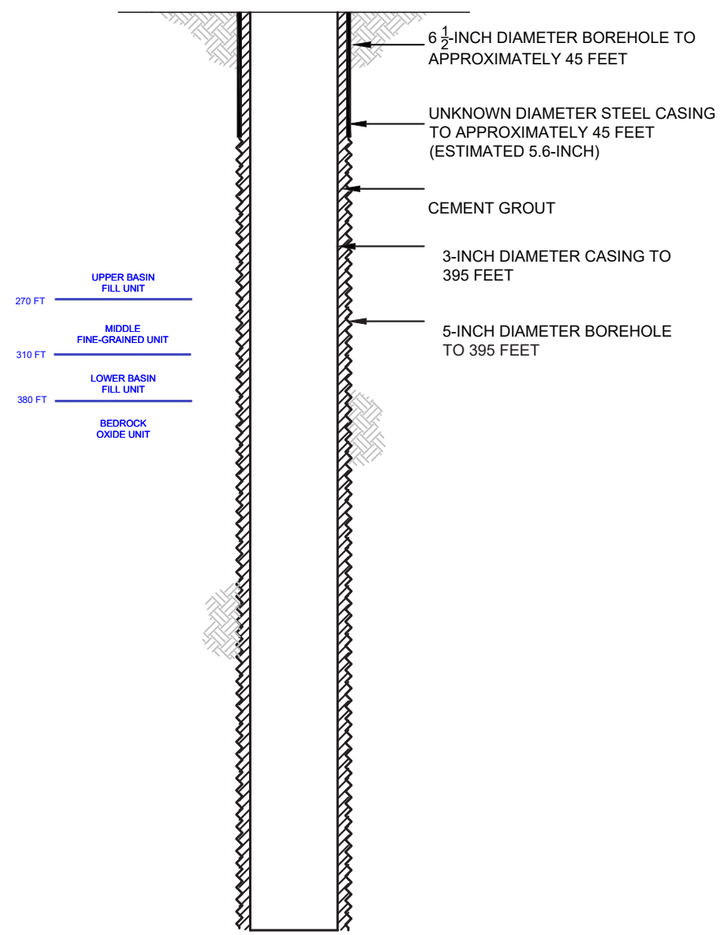
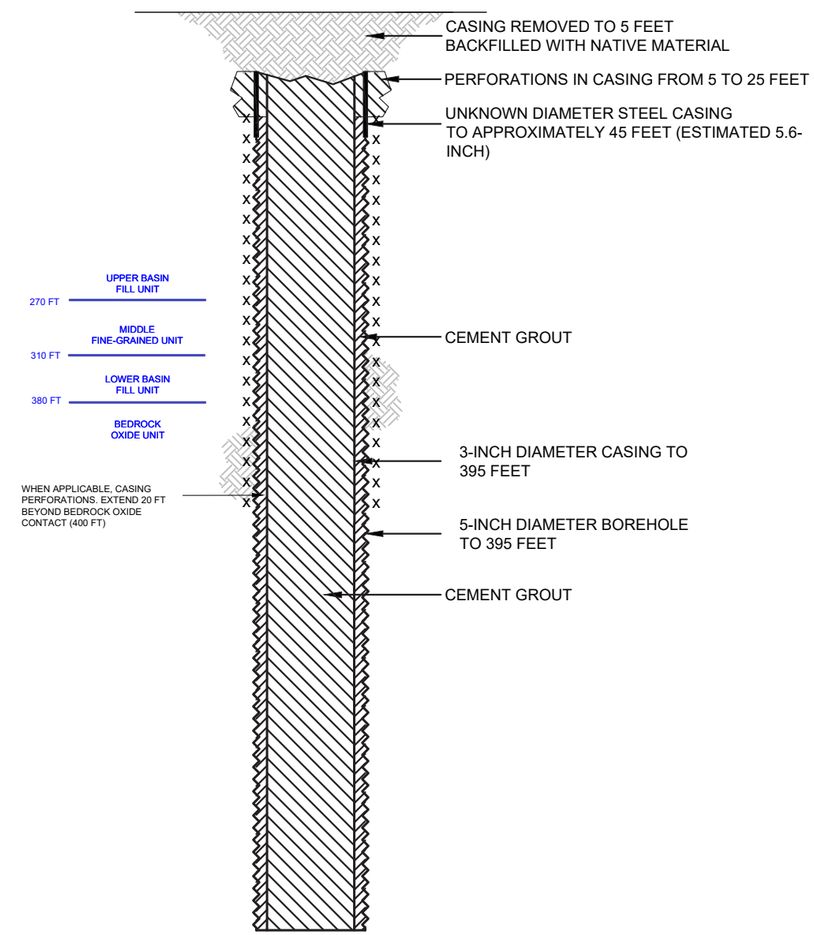
AS-BUILT COREHOLE 491MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 491MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 491MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

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R9UIC-AZ3-FY11-1		492MF

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

Surface Location

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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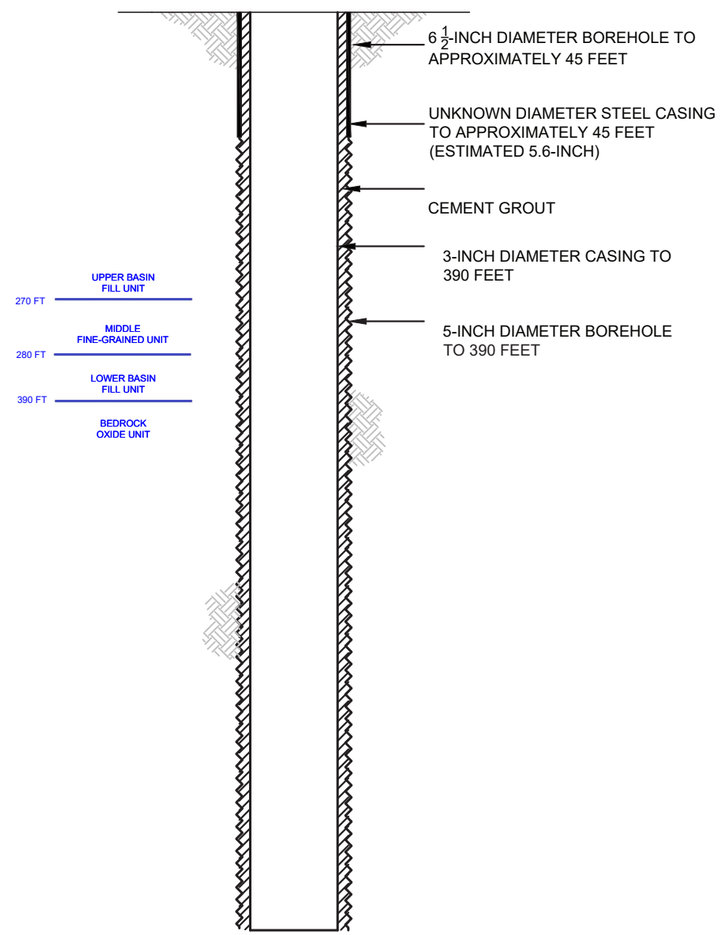
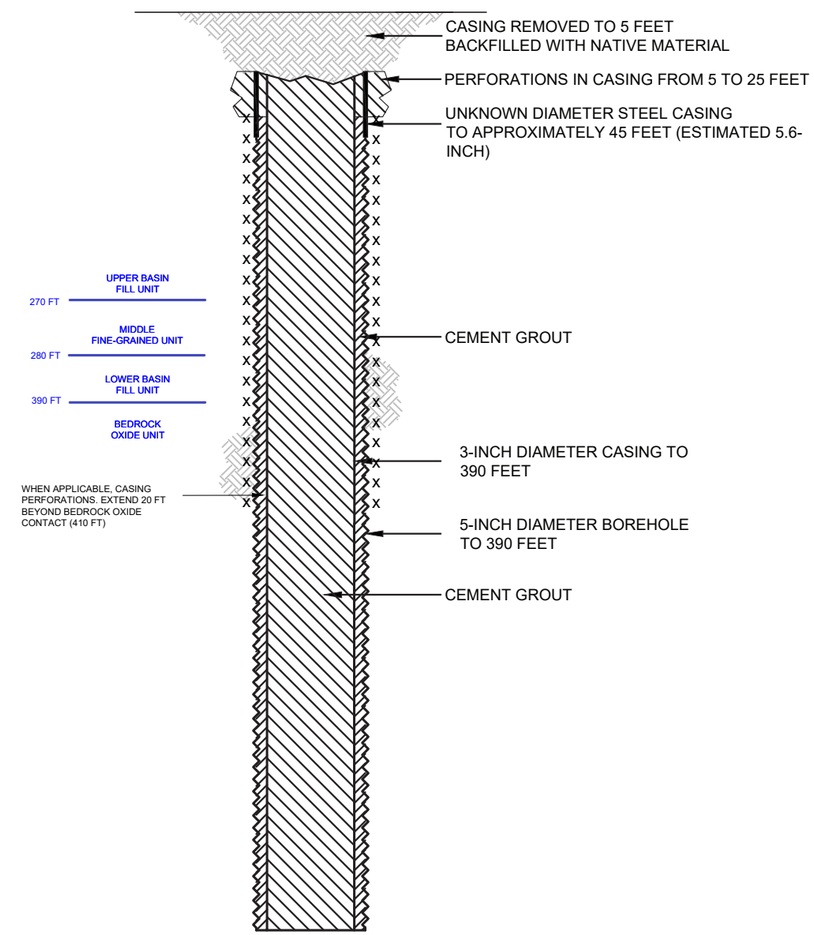
AS-BUILT COREHOLE 492MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 492MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 492MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		495MF

State	County
Arizona	Pinal

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

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04439655

Longitude -111.4301862

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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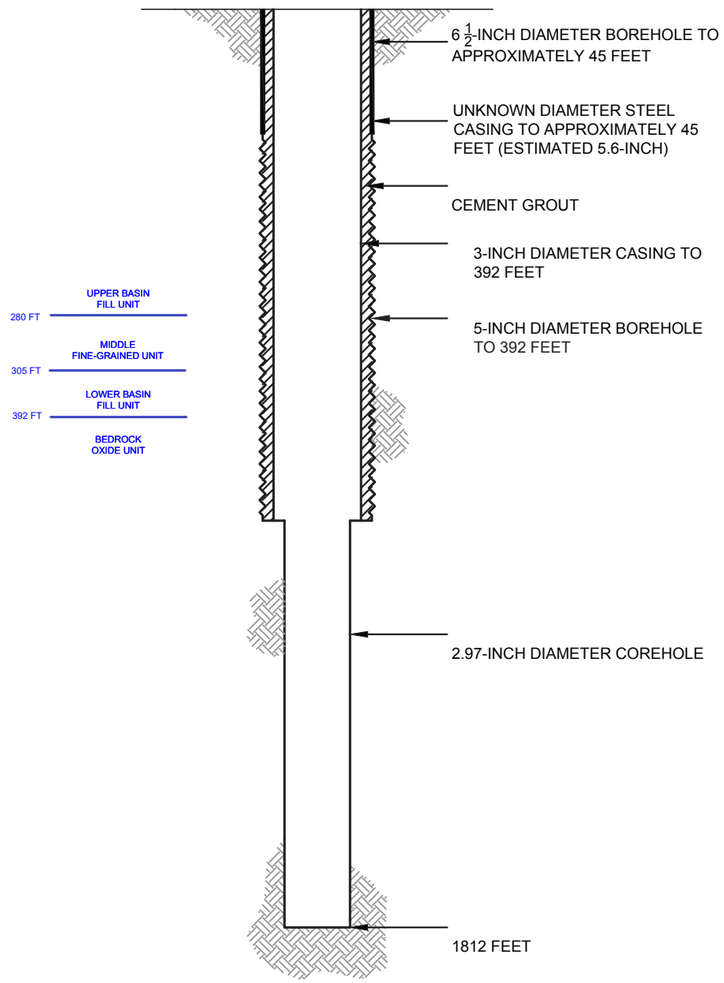
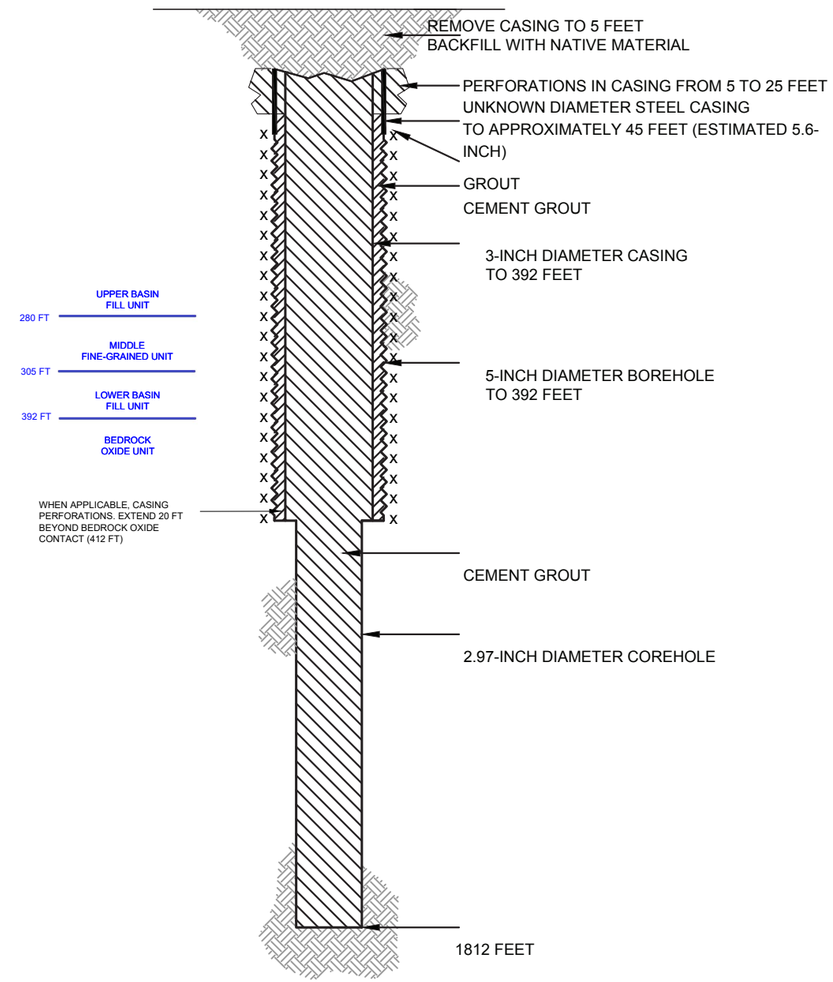


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 495MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 495MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		496MF

State	County
Arizona	Pinal

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

Latitude 33.04439972

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4310021

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

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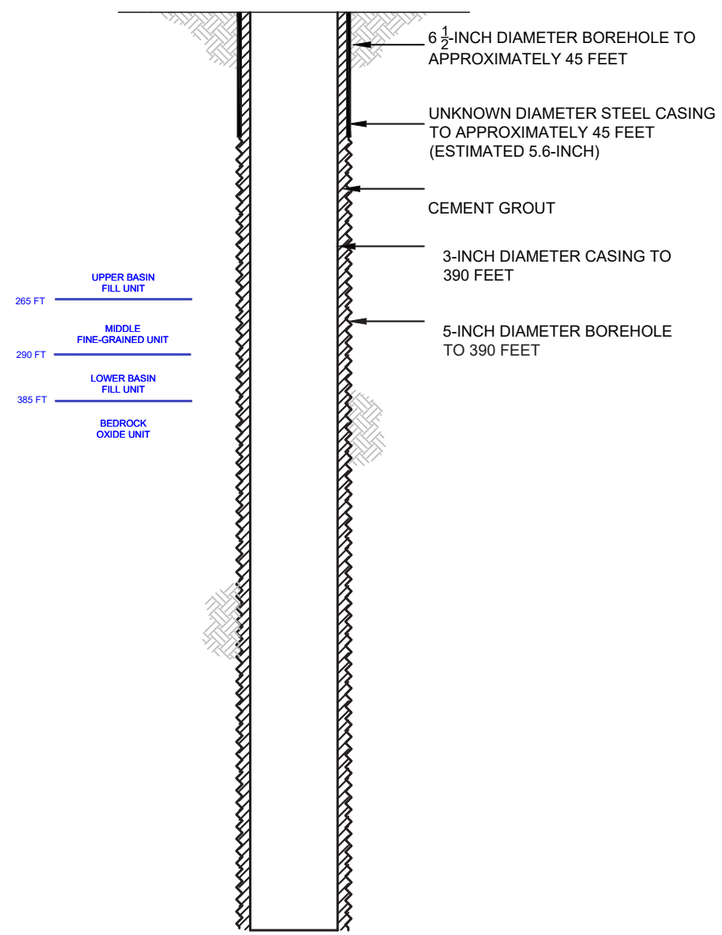
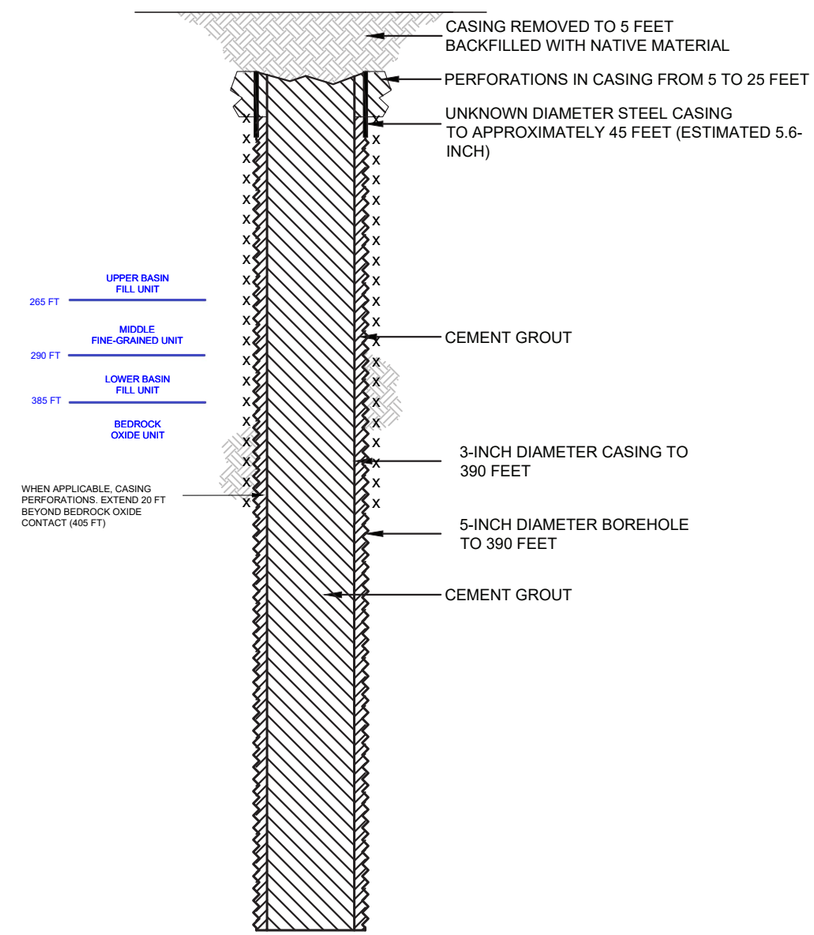


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 496MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 496MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		497MF

State	County
Arizona	Pinal

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

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.0444029

Longitude -111.4318179

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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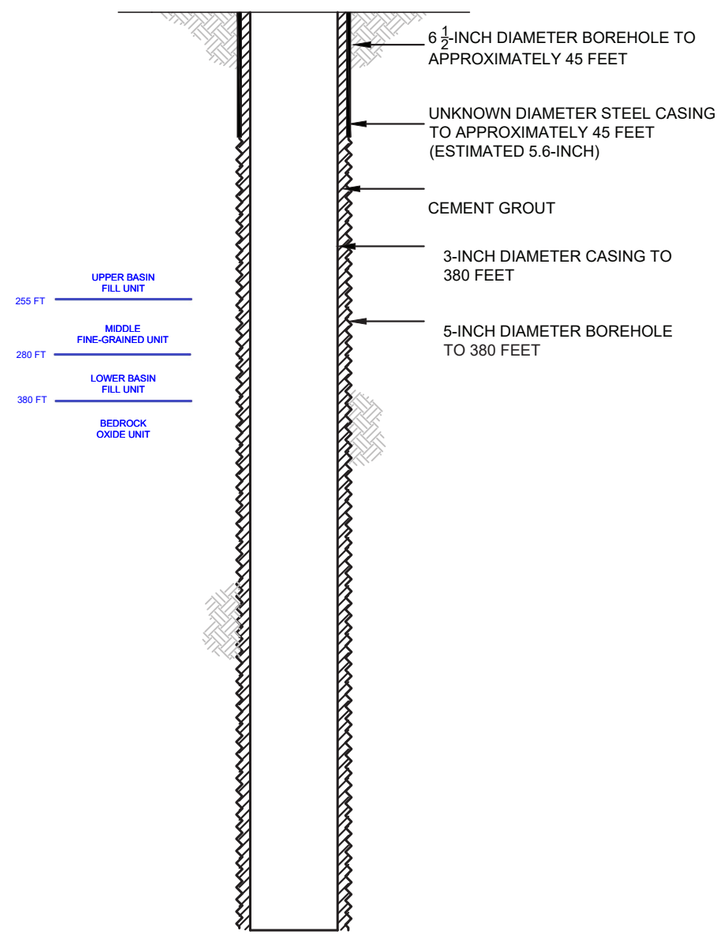
AS-BUILT COREHOLE 497MF



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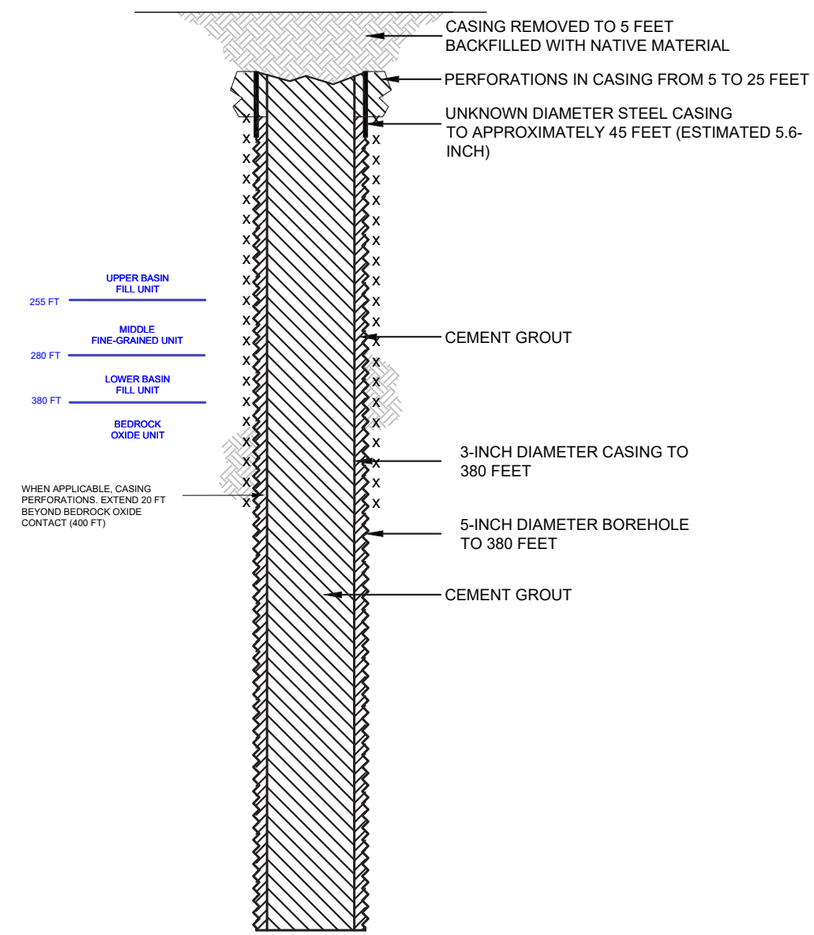

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EPA

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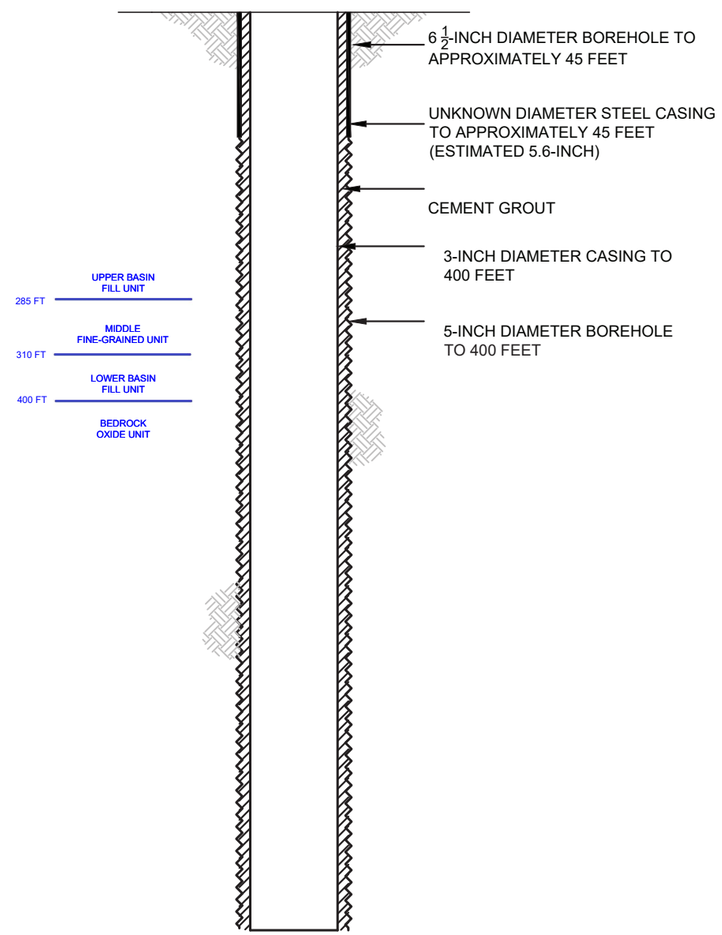

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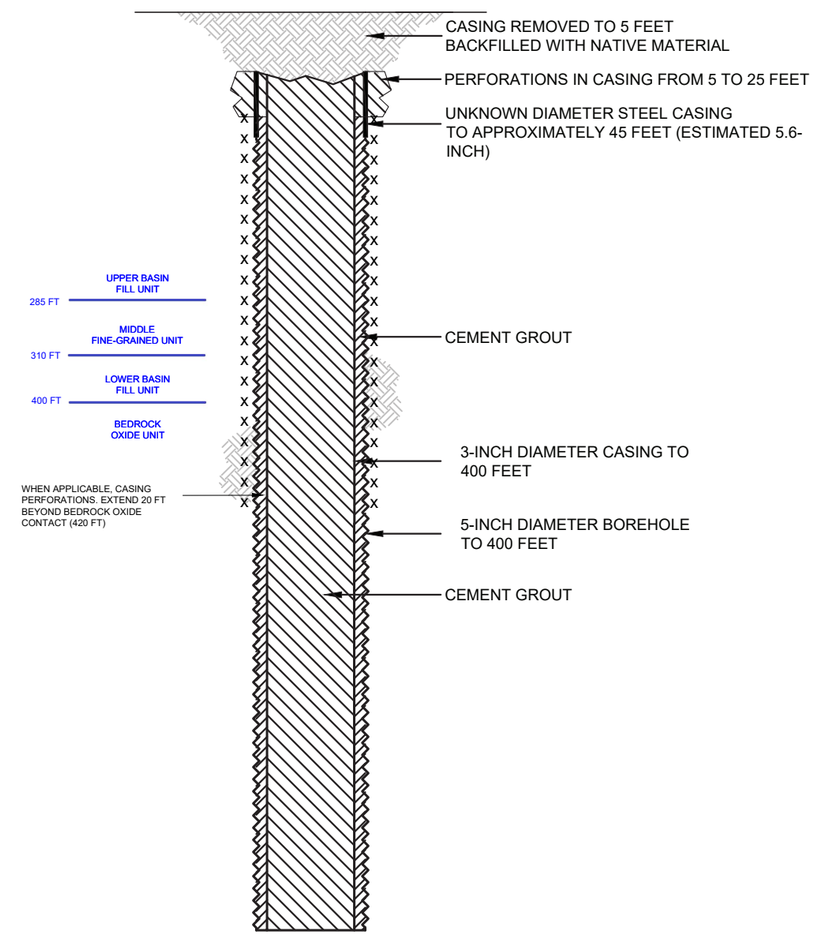

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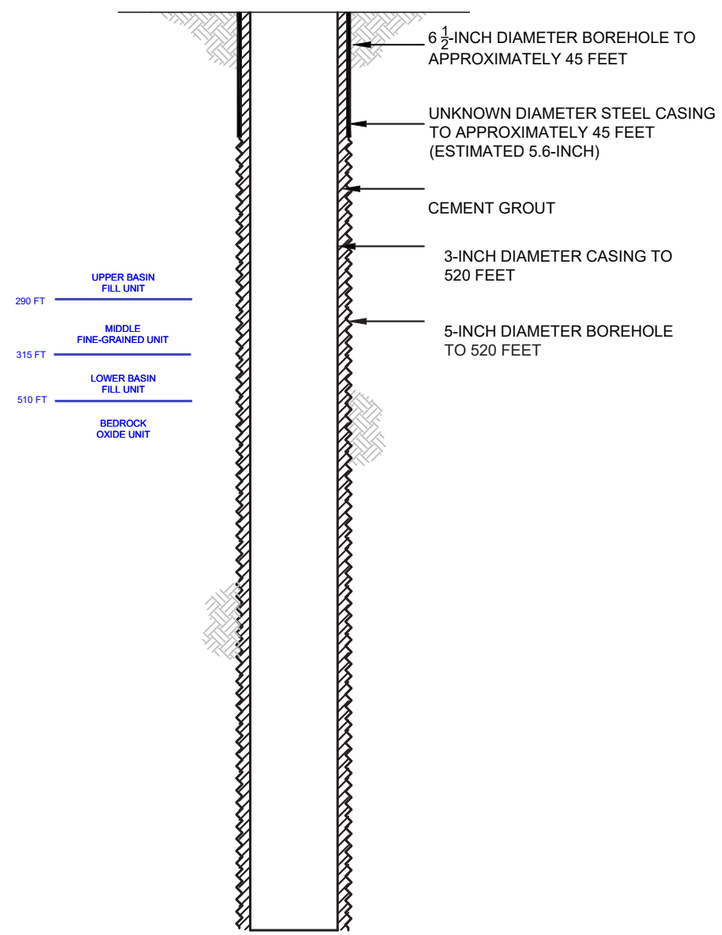
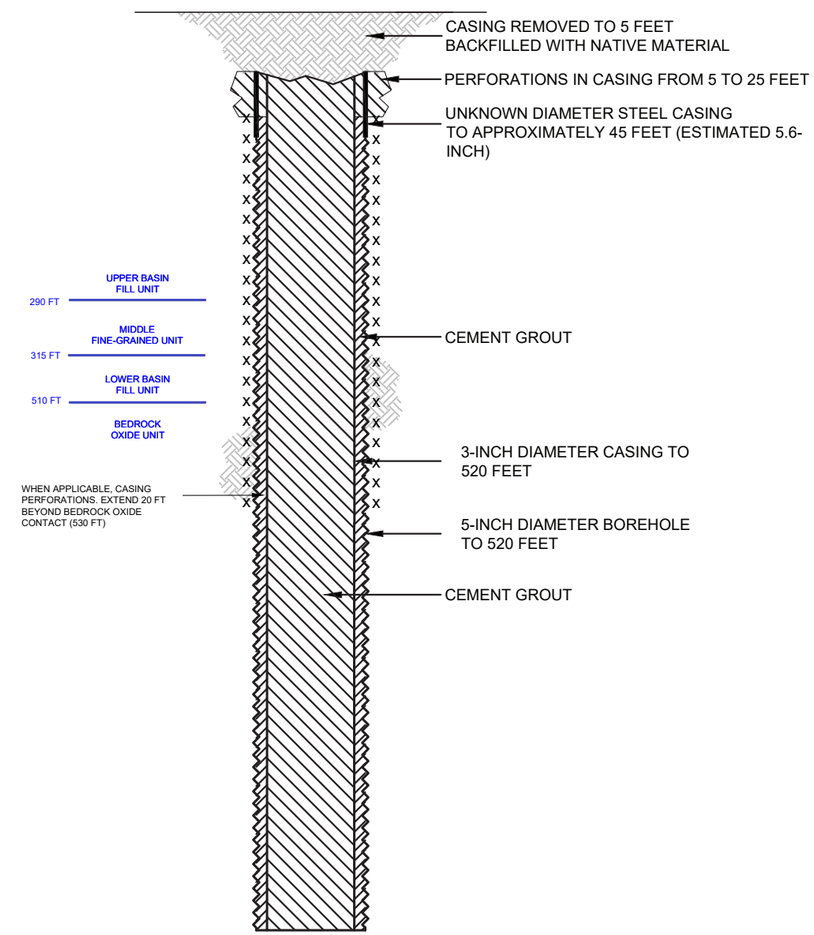
AS-BUILT COREHOLE 499MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 499MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 499MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		500MF

State	County
Arizona	Pinal

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

Latitude 33.04441239

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.434265358

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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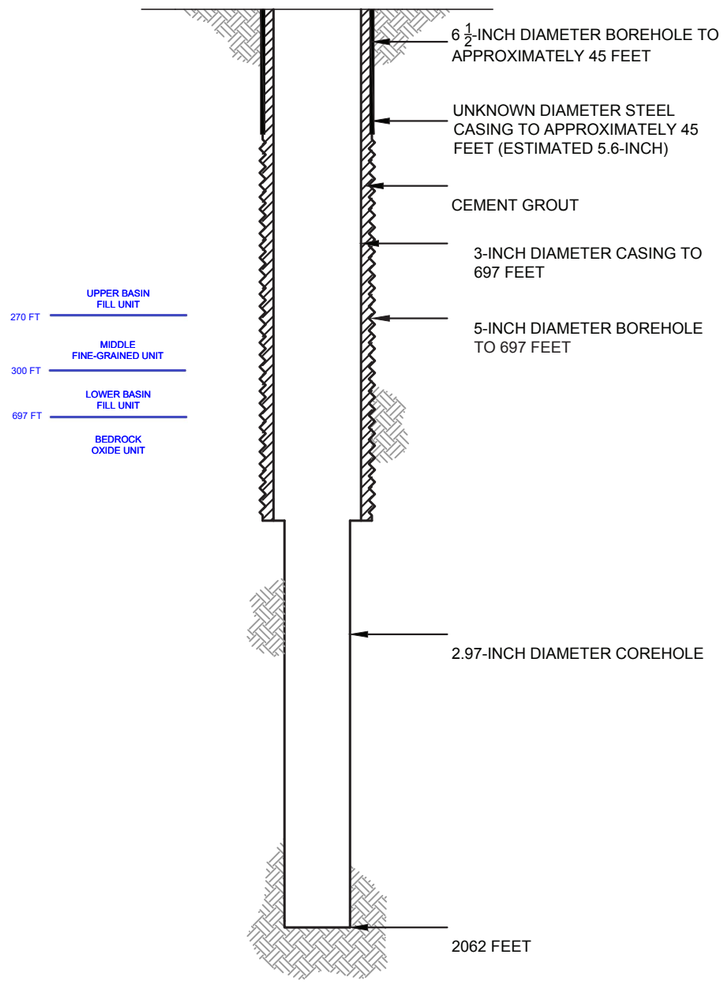
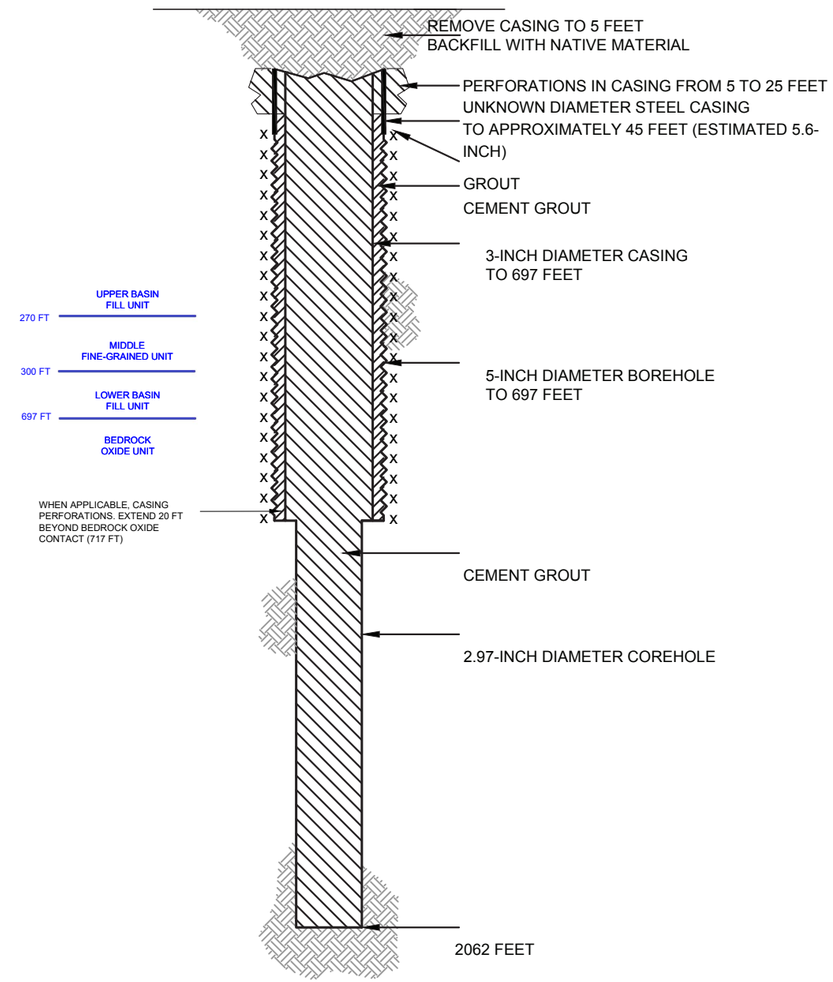
AS-BUILT COREHOLE 500MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 500MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 500MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		501MF

State	County
Arizona	Pinal

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

Latitude 33.04441554

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4350812

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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

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Dan Johnson, VP - General Manager		10/3/2019

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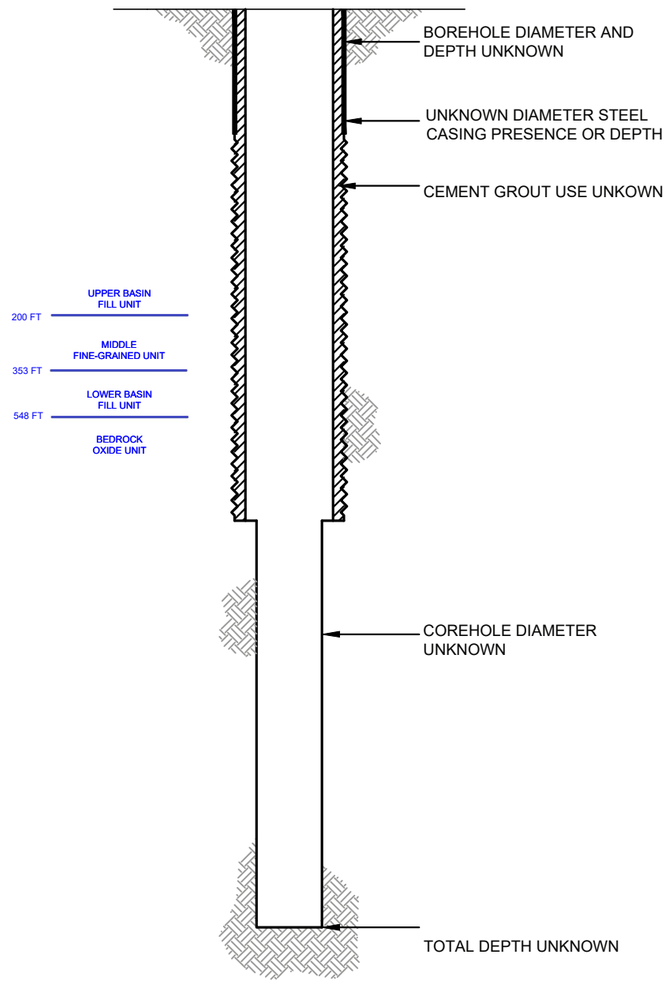
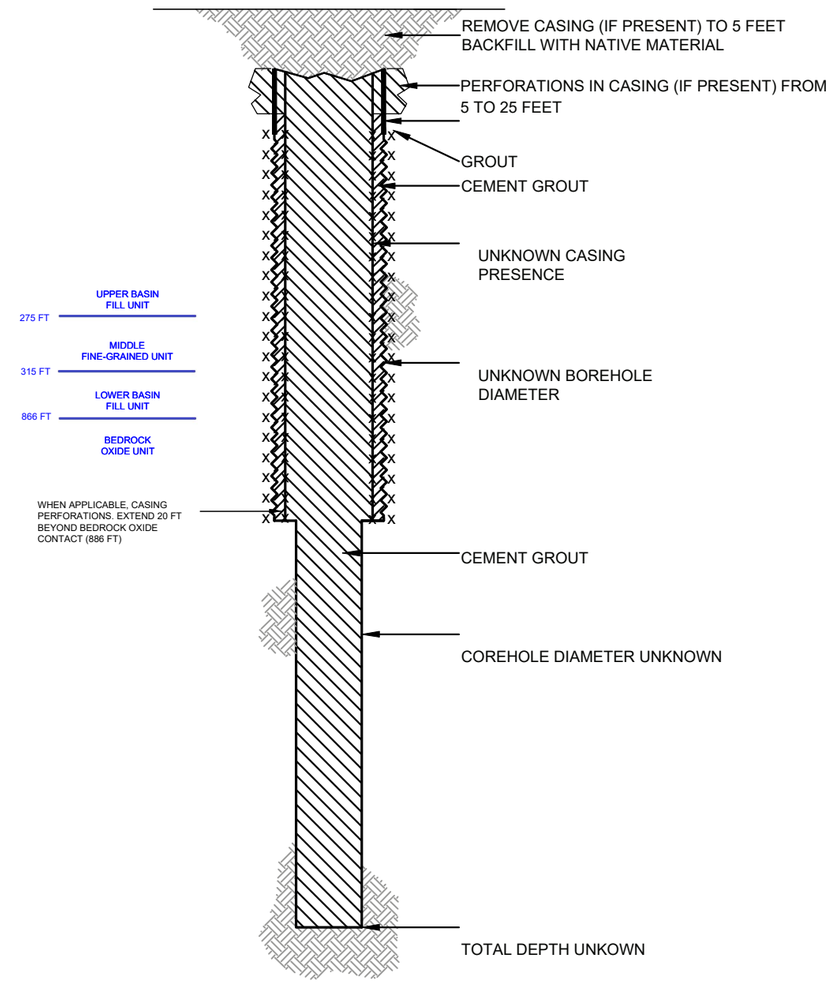


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 501MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 504MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG
Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		502MF

State	County
Arizona	Pinal

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

Latitude 33.04441869

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.435897

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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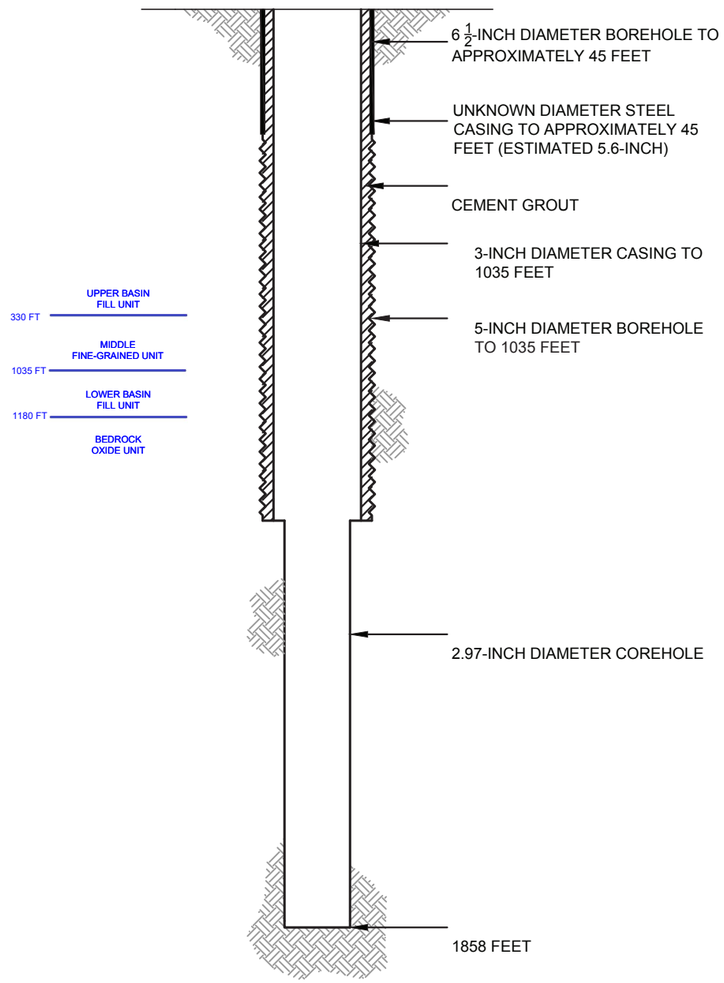
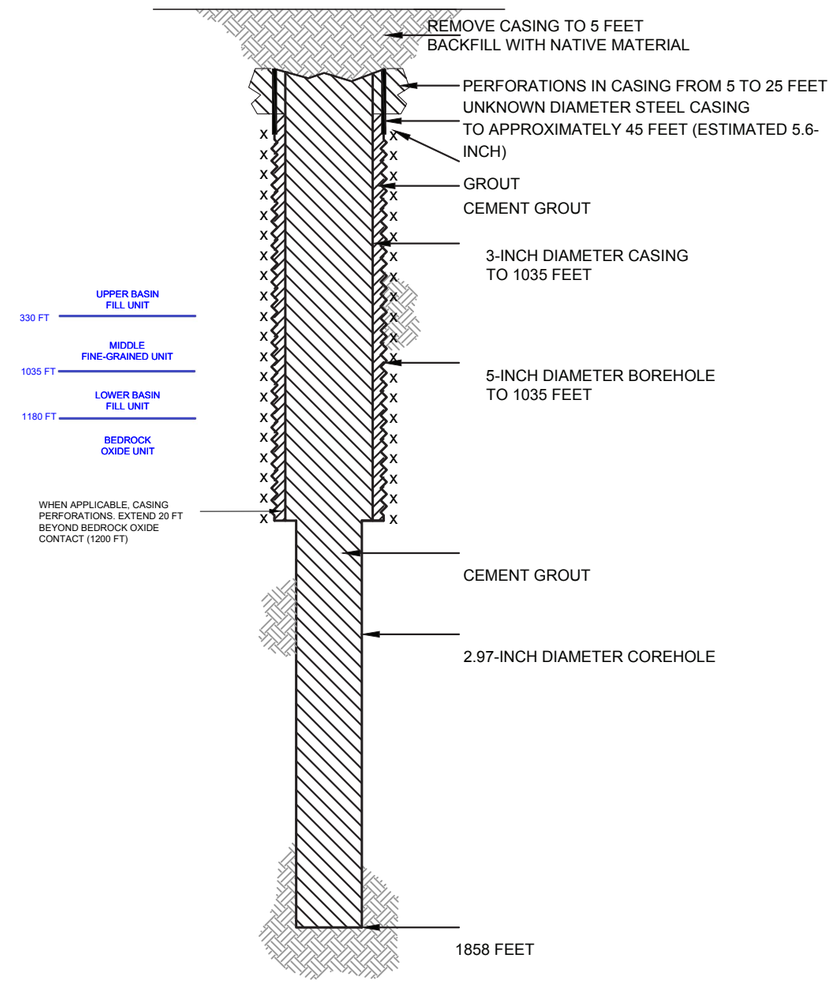
AS-BUILT COREHOLE 502MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 502MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 502MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		503MF

State	County
Arizona	Pinal

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

Latitude 33.04382205

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4354923

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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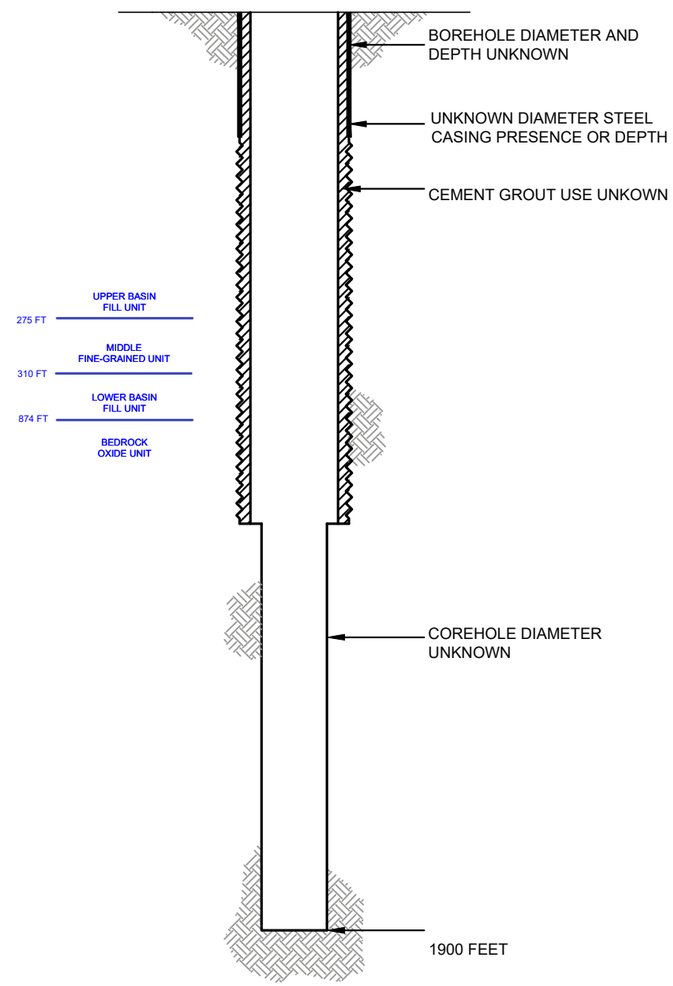
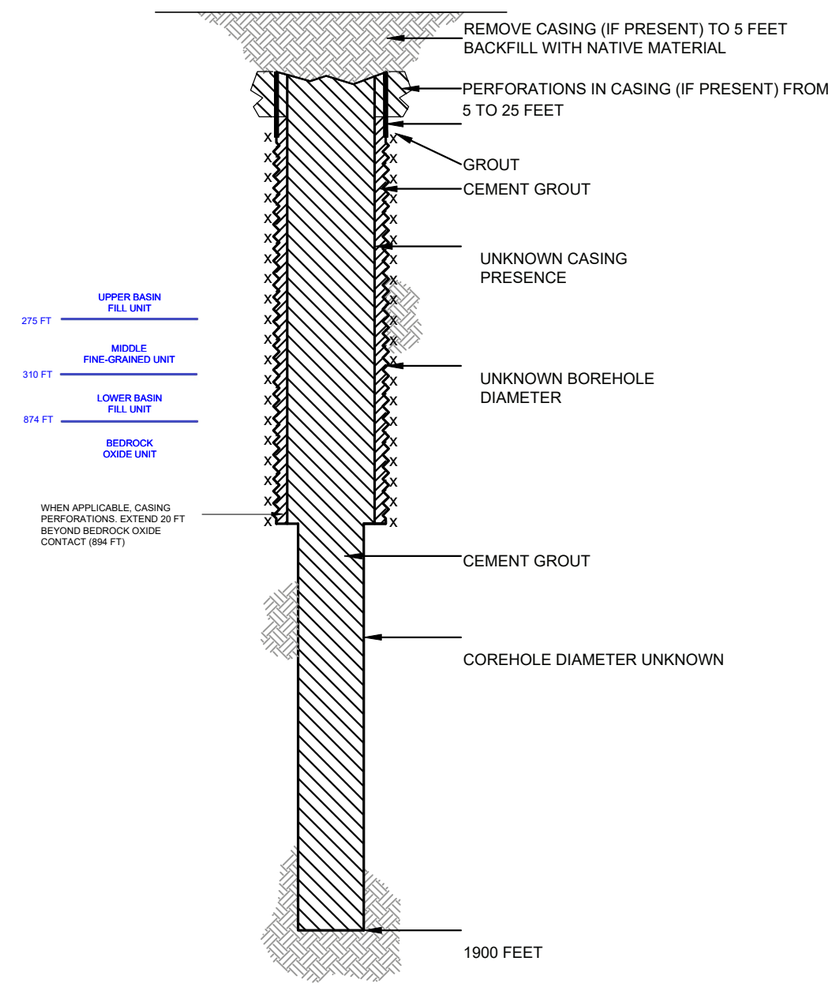
AS-BUILT COREHOLE 503MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 503MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 503MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		504MF

State	County
Arizona	Pinal

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

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04381575

Longitude -111.4338607

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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Dan Johnson, VP - General Manager		10/3/2019

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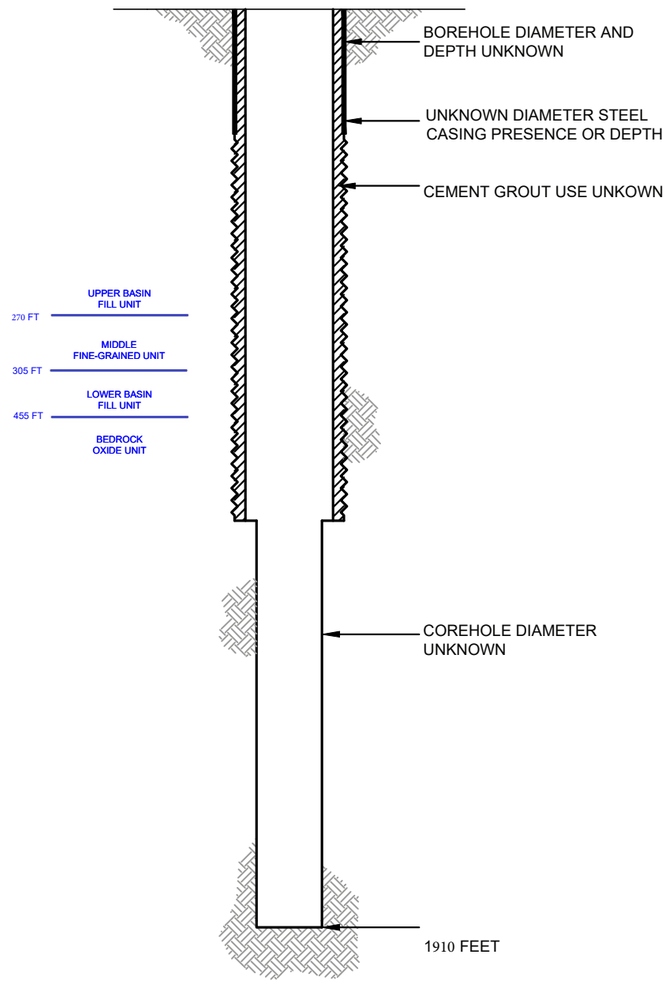
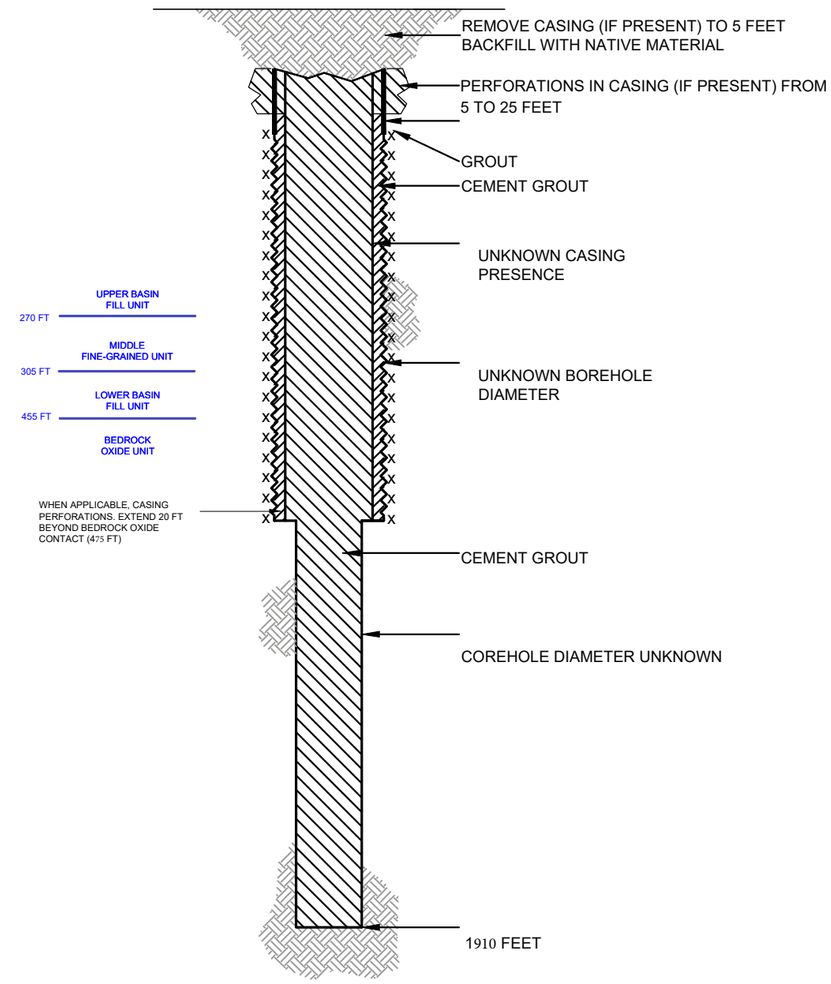
AS-BUILT COREHOLE 504MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 504MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 504MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		505MF

State	County
Arizona	Pinal

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

Latitude 33.04380942

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.432229

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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Dan Johnson, VP - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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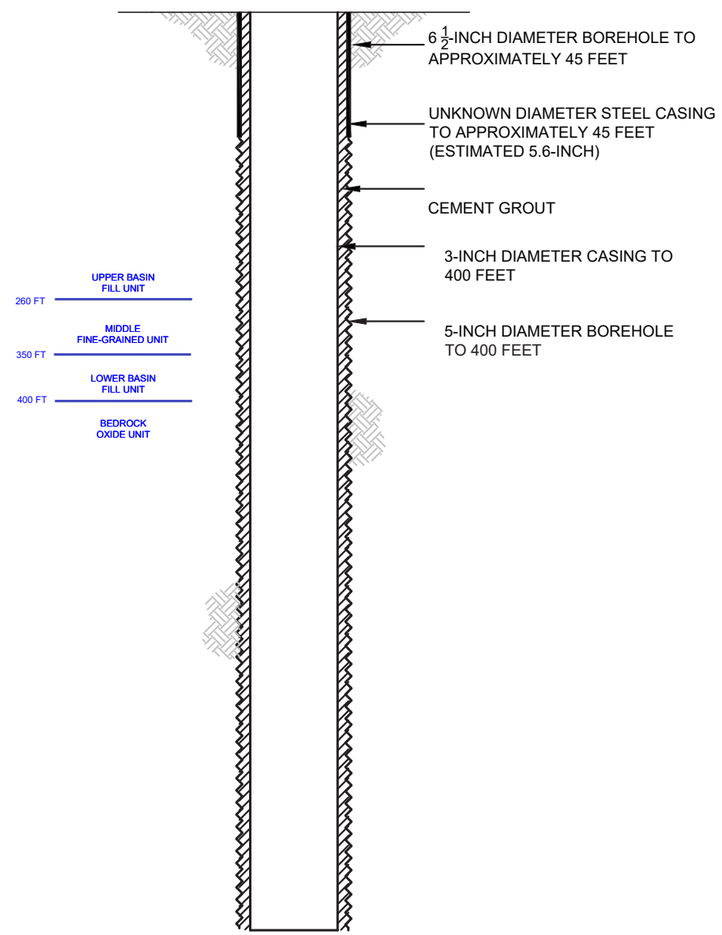
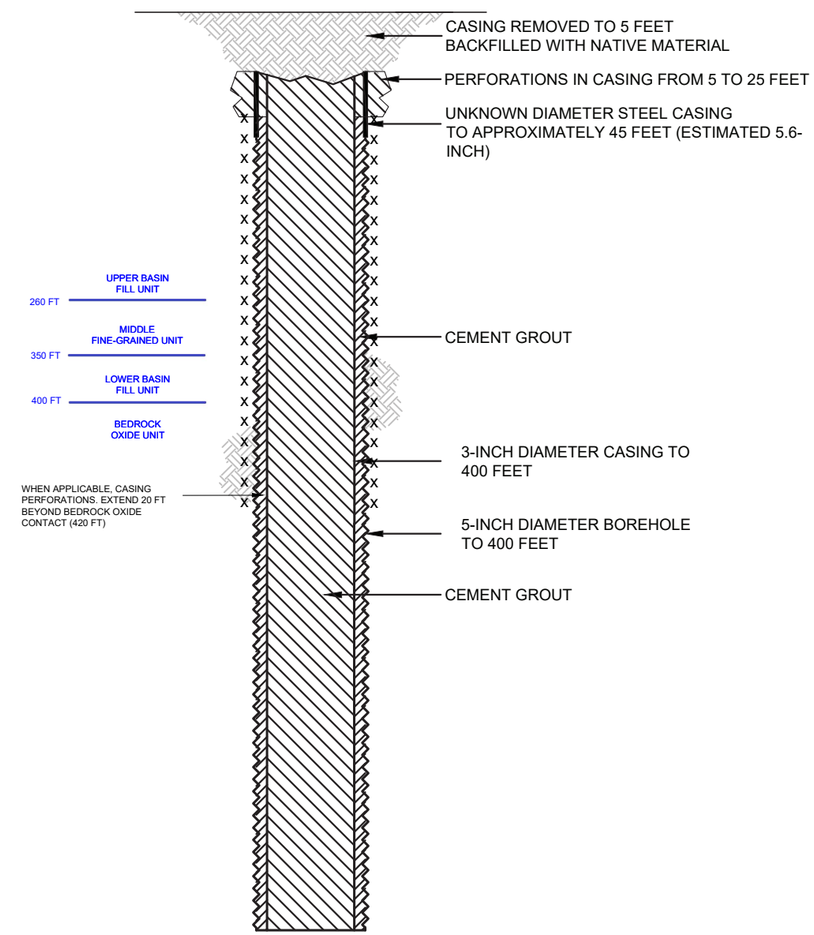
AS-BUILT COREHOLE 505MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 505MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 505MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:13 PM Layout: ABANDON (2)
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\448S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		506MF

State	County
Arizona	Pinal

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

Latitude 33.04380307

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4305974

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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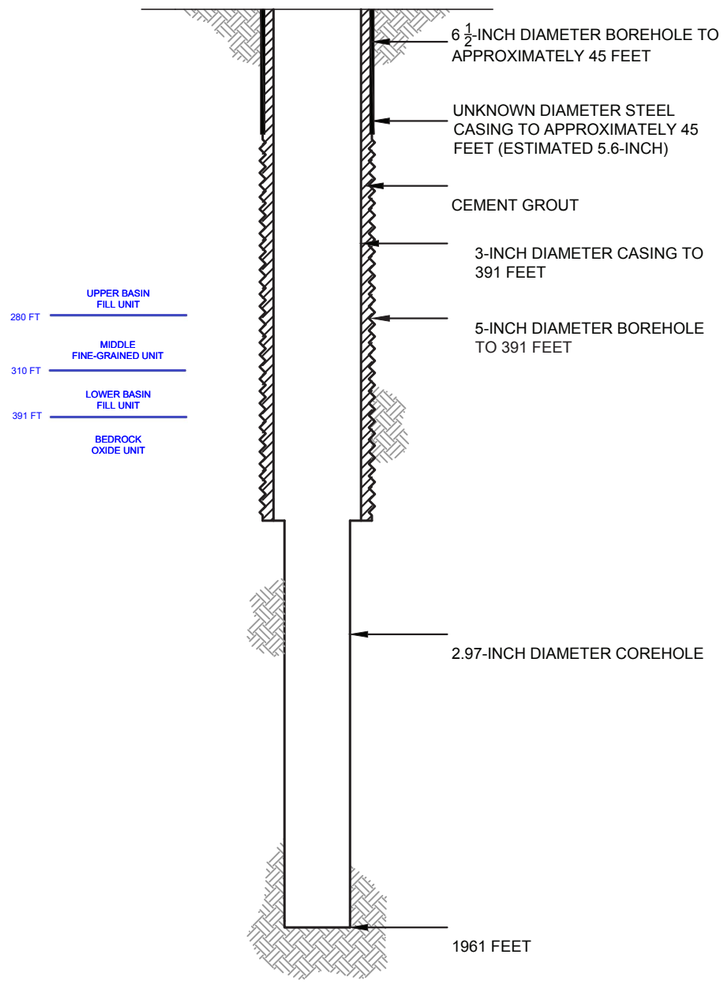
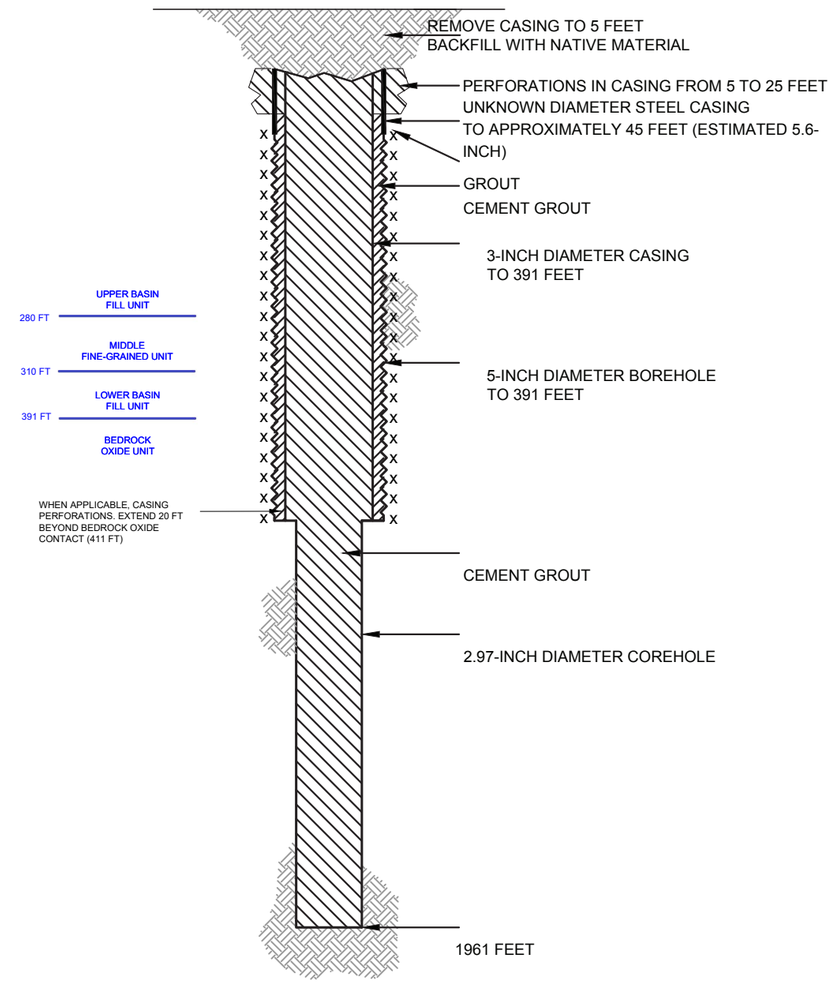
AS-BUILT COREHOLE 506MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 506MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 506MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		507MF

State	County
Arizona	Pinal

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

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04320642

Longitude -111.4301928

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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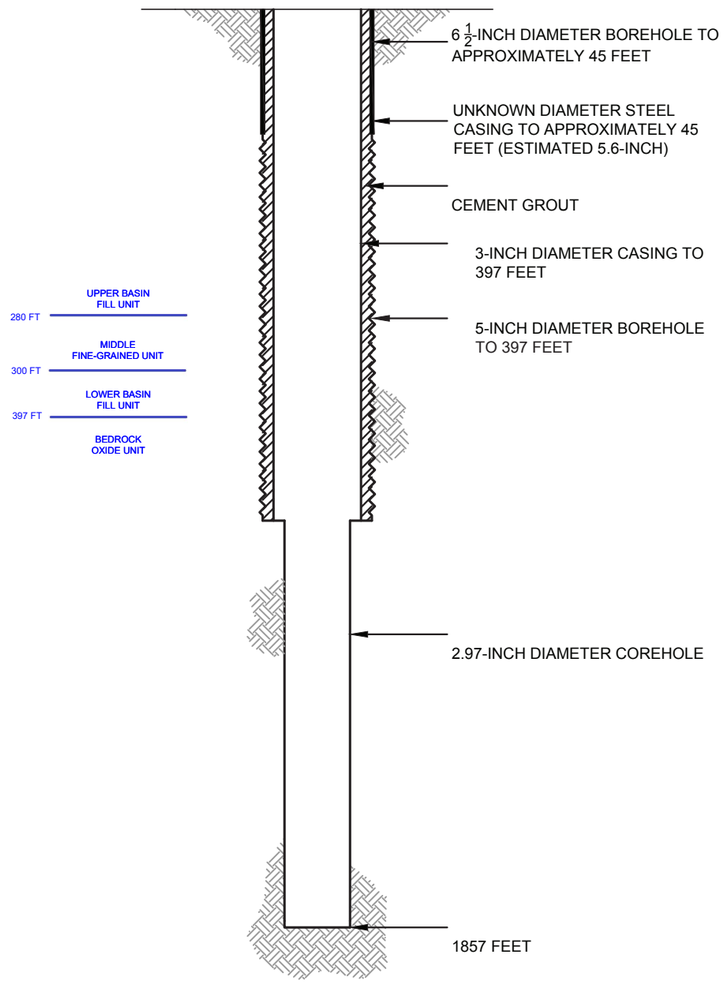
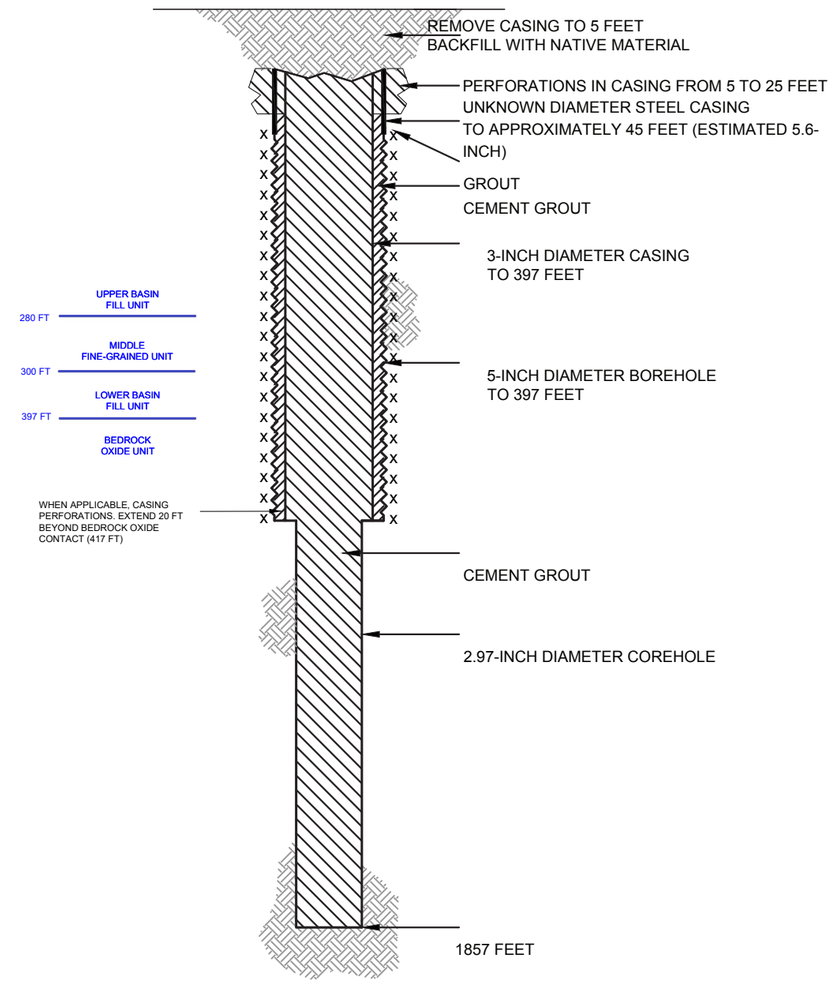


PROPOSED PLUGGING AND ABANDONMENT COREHOLE 507MF



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FLORENCE, ARIZONA

COREHOLE 507MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

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MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

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R9UIC-AZ3-FY11-1		508MF

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If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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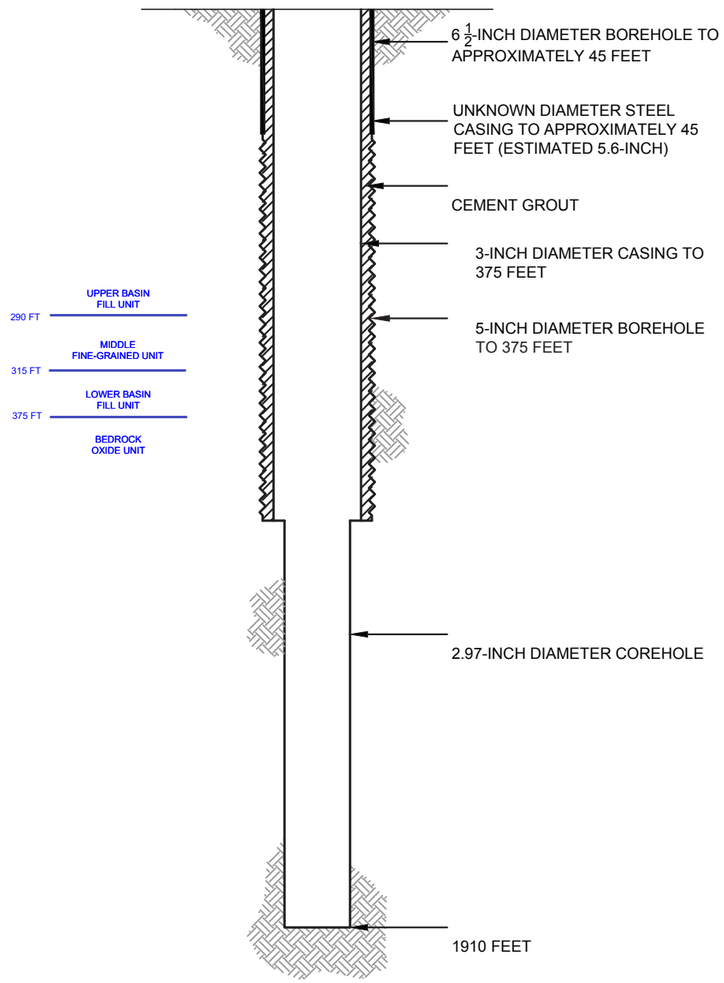
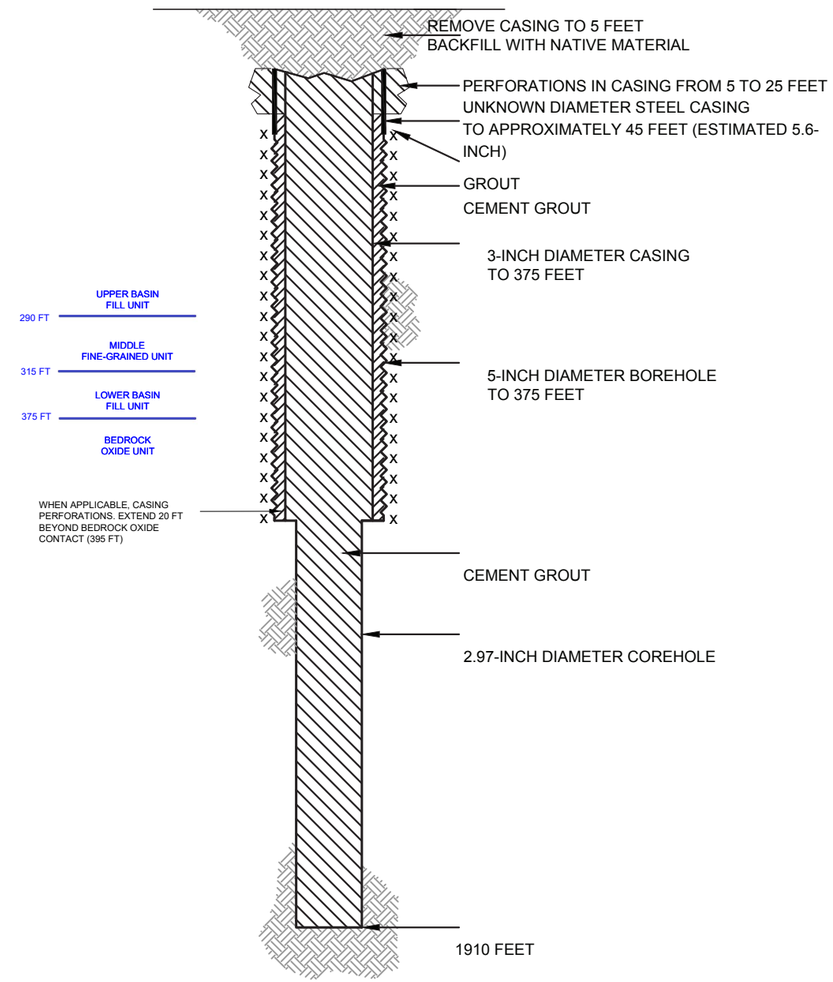
AS-BUILT COREHOLE 508MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 508MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 508MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		509MF

State	County
Arizona	Pinal

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

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04321277

Longitude -111.4318244

_____ ft. from (N/S) _____ Line of quarter section

_____ ft. from (E/W) _____ Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP - General Manager		10/3/2019

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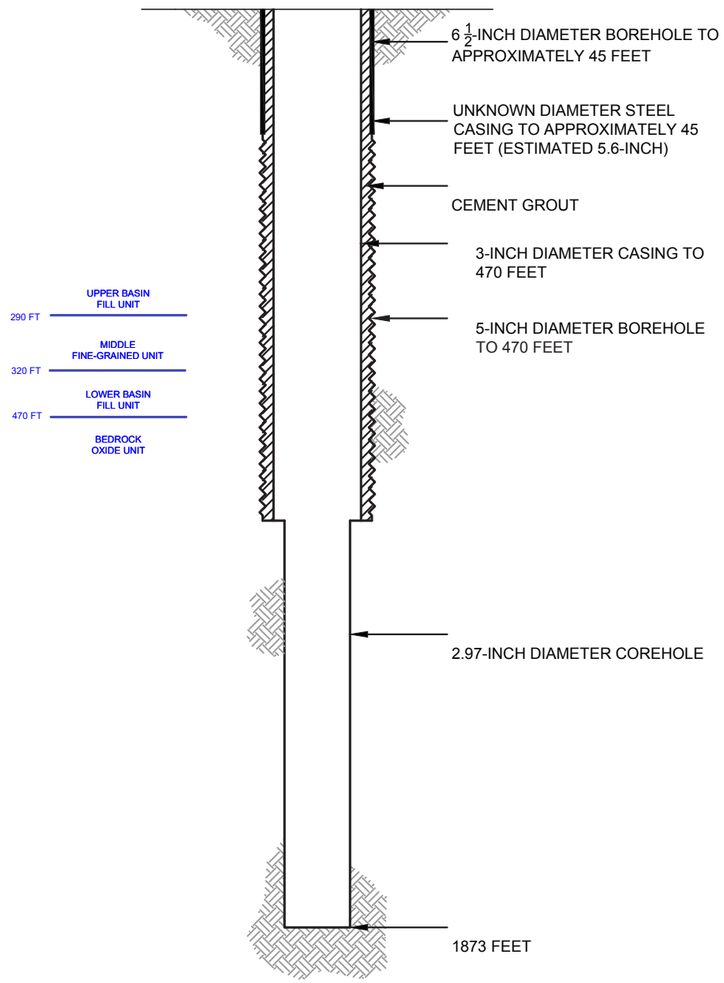
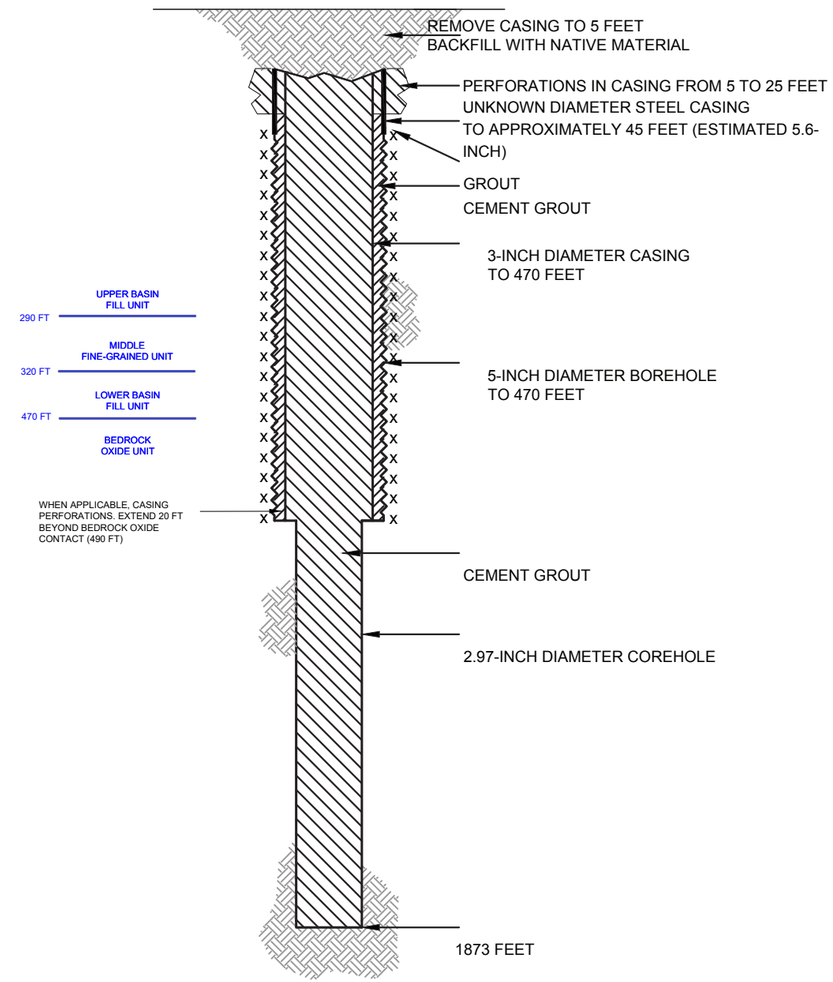
AS-BUILT COREHOLE 509MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 509MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 509MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		510MF

State	County
Arizona	Pinal

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

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Latitude 33.04321594

Longitude -111.4326402

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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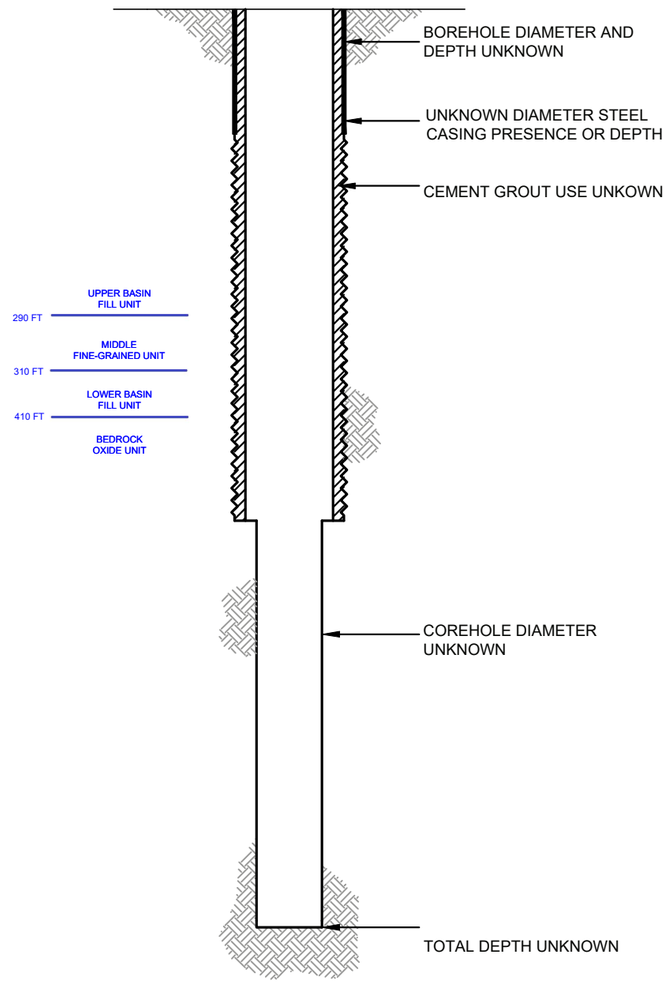
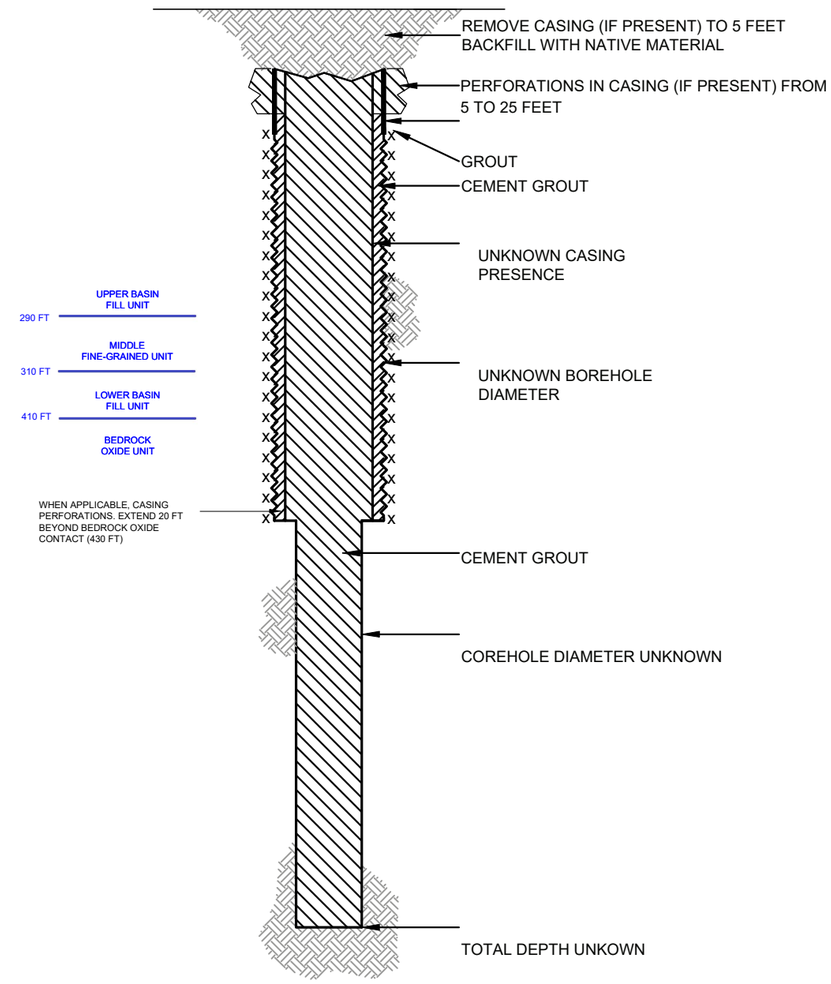
AS-BUILT COREHOLE 510MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 510MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 510MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA
Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
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OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		511MF

State	County
Arizona	Pinal

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

Latitude 33.0432191

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.433456

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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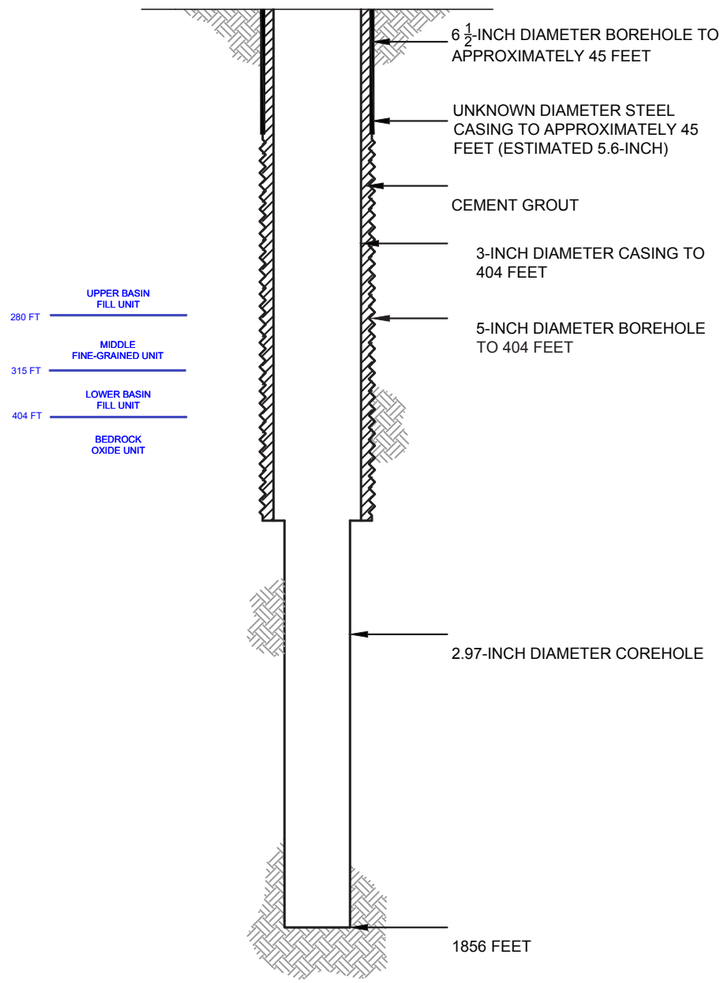
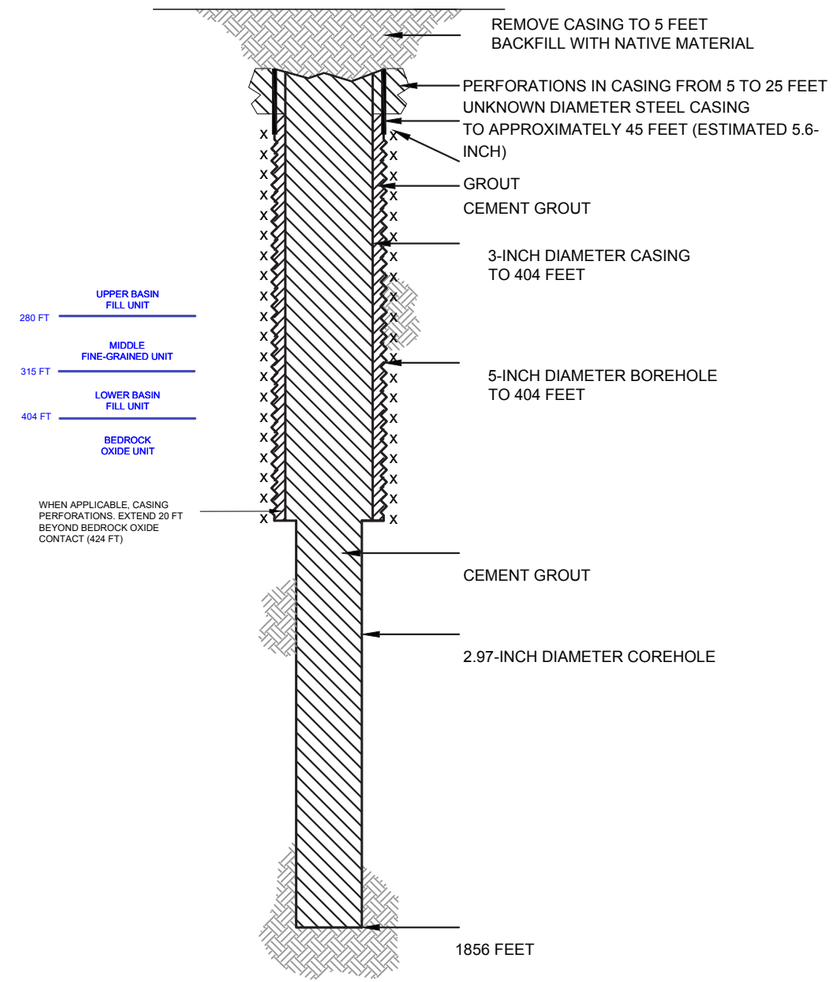
AS-BUILT COREHOLE 511MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 511MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 511MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

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R9UIC-AZ3-FY11-1		512MF

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

Latitude 33.04322226

Longitude -111.4342718

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

_____ **ft. from (N/S)** _____ **Line of quarter section**

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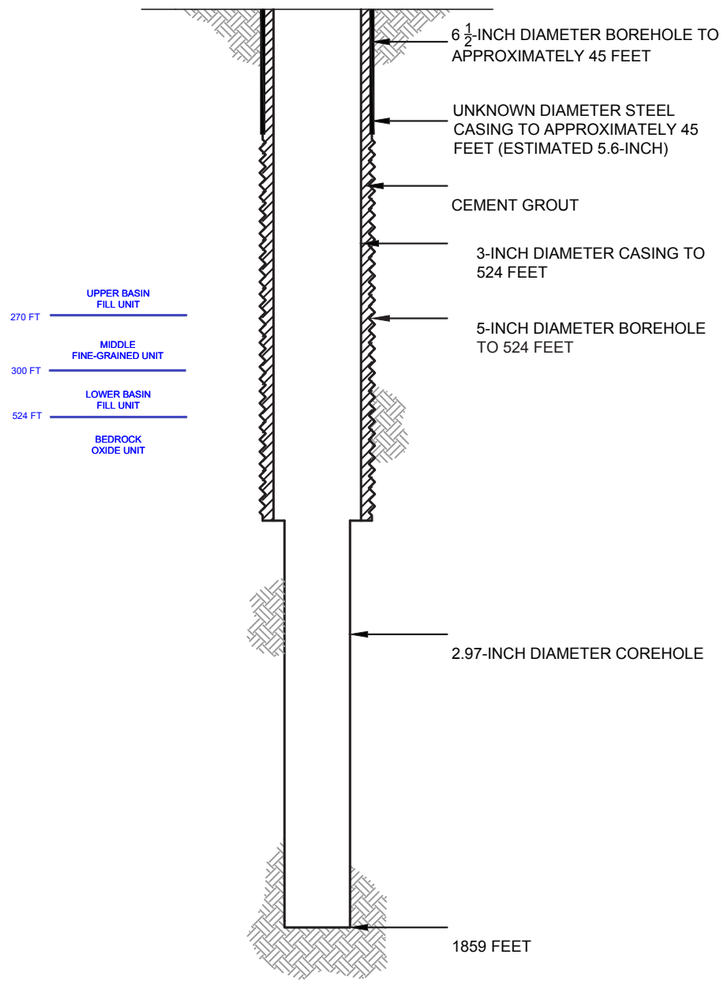

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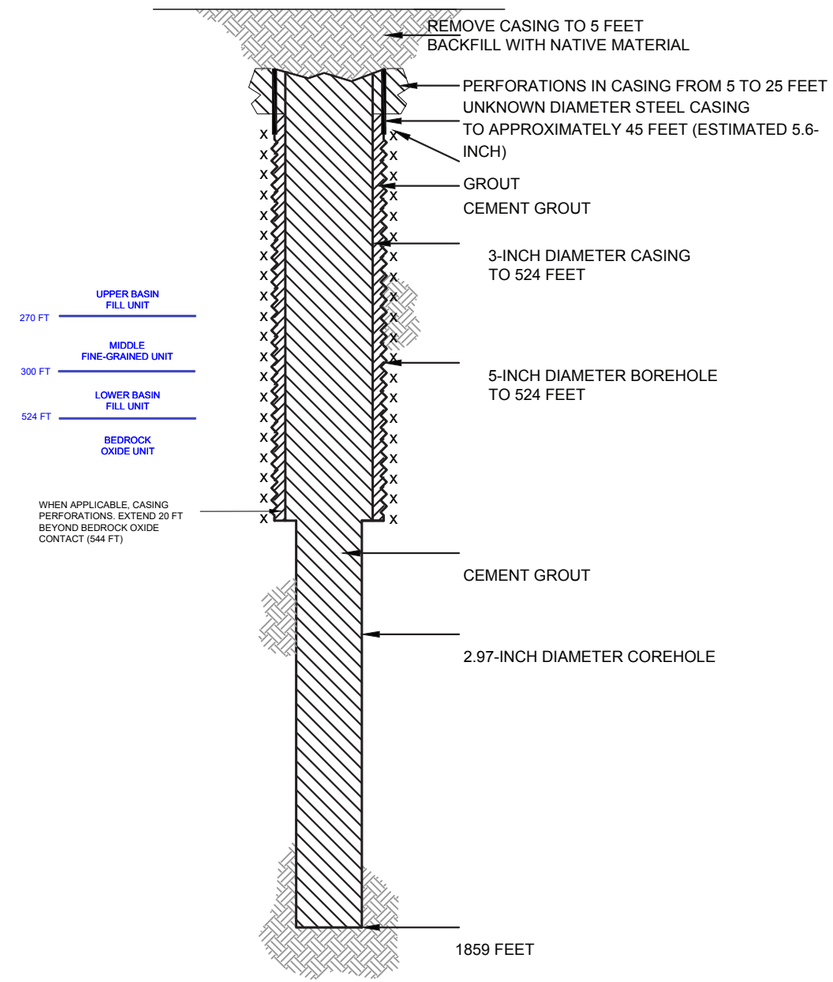

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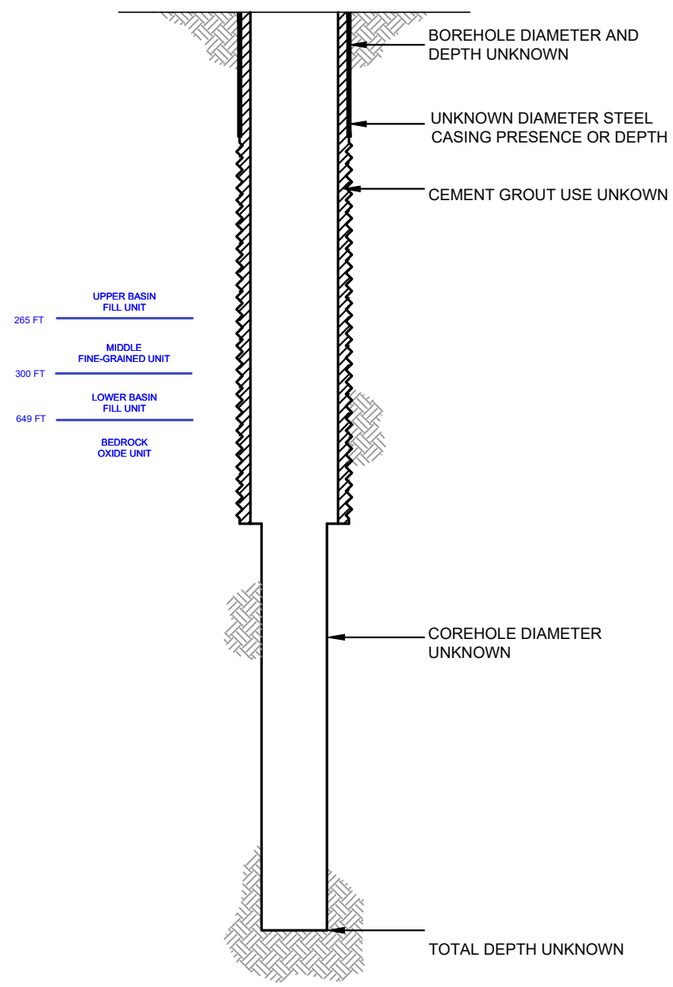
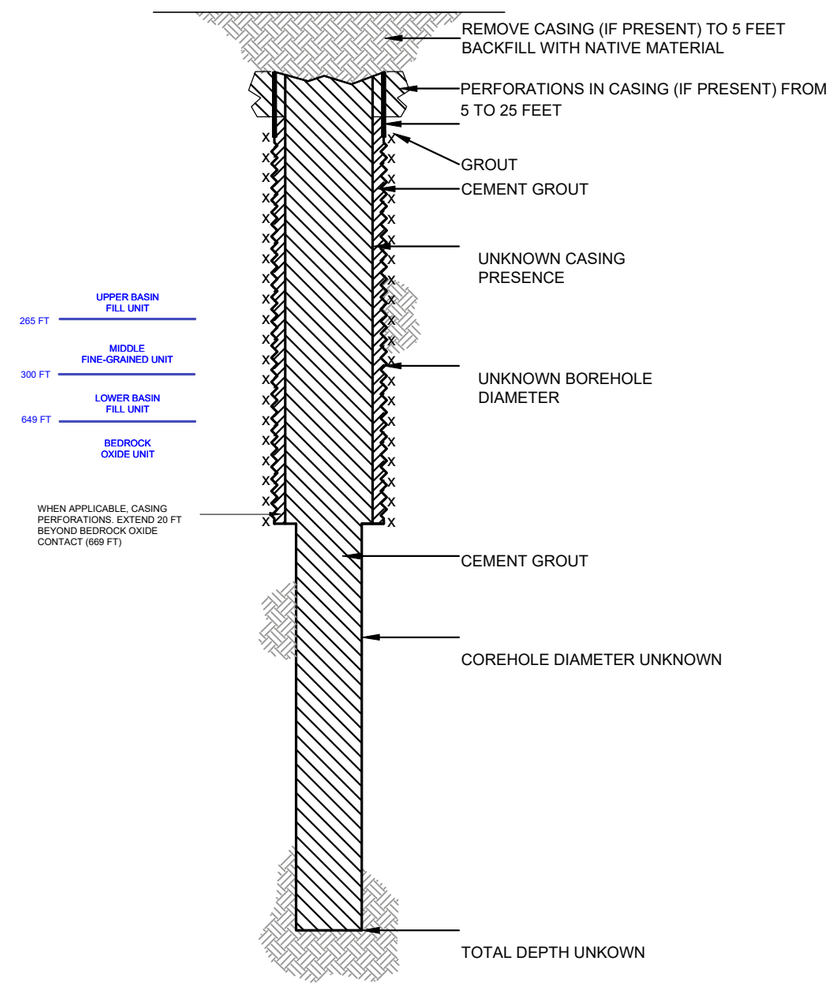
AS-BUILT COREHOLE 513MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 513MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 513MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG
Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		516MF

State	County
Arizona	Pinal

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

Latitude 33.04322773

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4359035

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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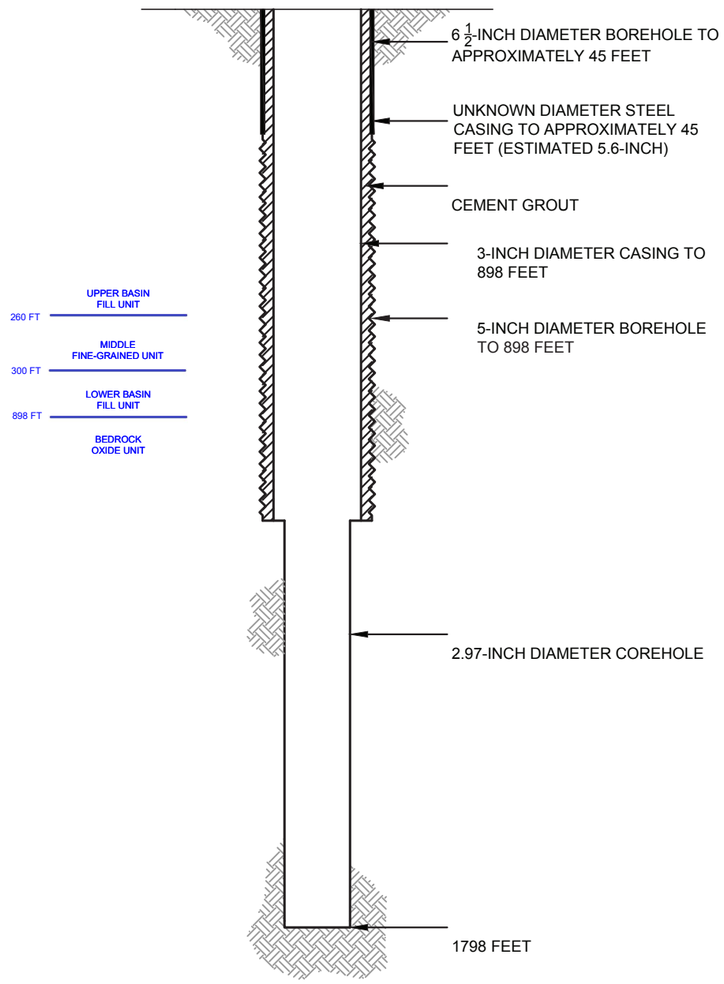
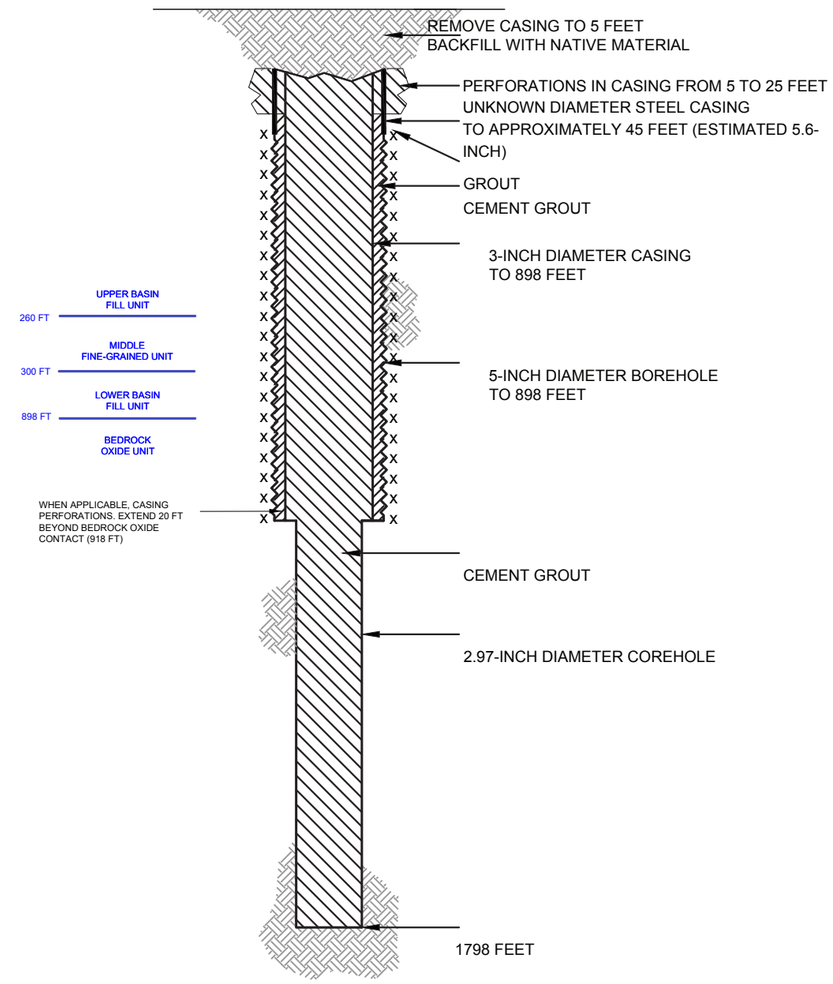
AS-BUILT COREHOLE 516MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 516MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 516MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		518MF

State	County
Arizona	Pinal

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

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04561113

Longitude -111.4367077

_____ ft. from (N/S) _____ Line of quarter section

_____ ft. from (E/W) _____ Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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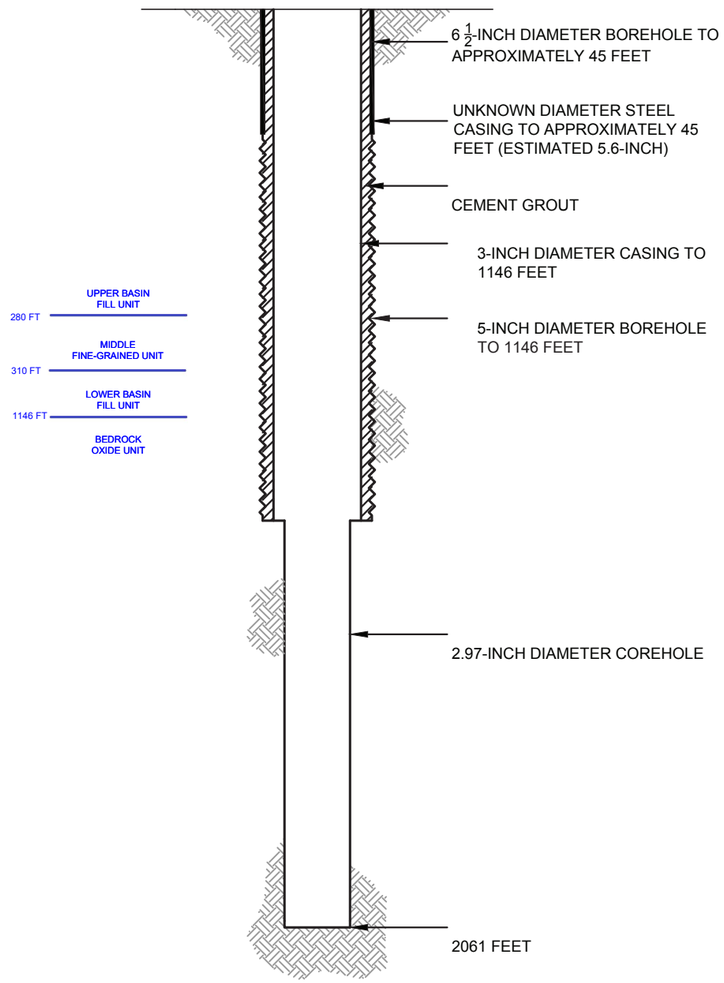
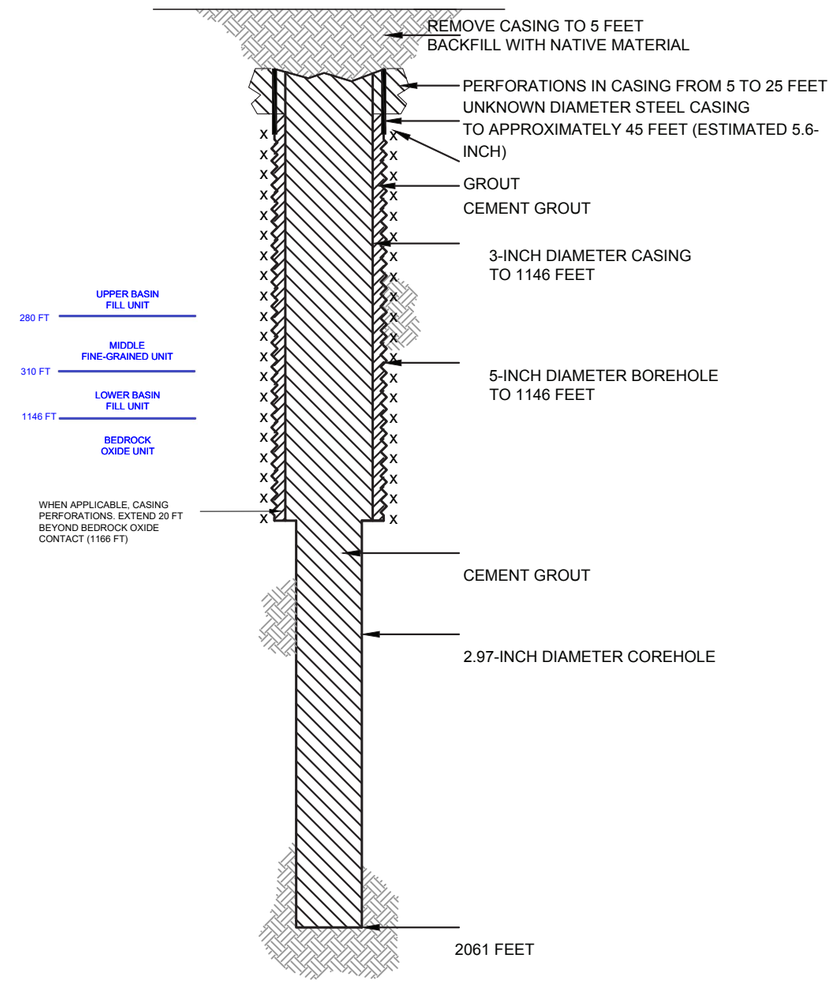
AS-BUILT COREHOLE 518MF



PROPOSED PLUGGING AND ABANDONMENT COREHOLE 518MF



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 518MF DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC367

State	County
Arizona	Pinal

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

Latitude 33.05037239

Surface Location

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

Longitude -111.4326089

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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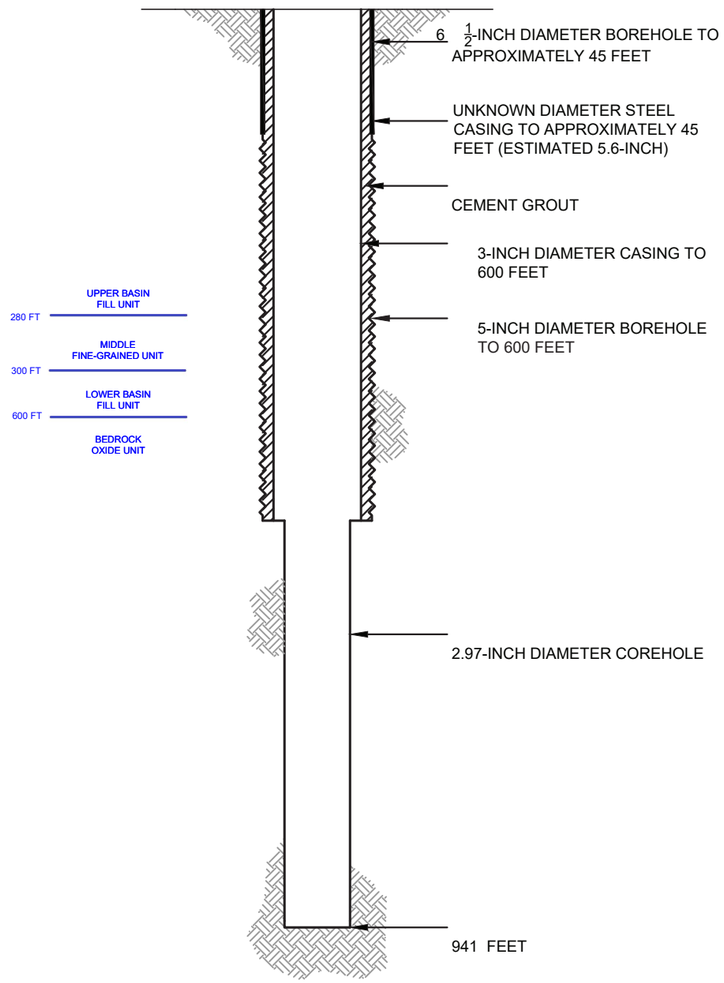
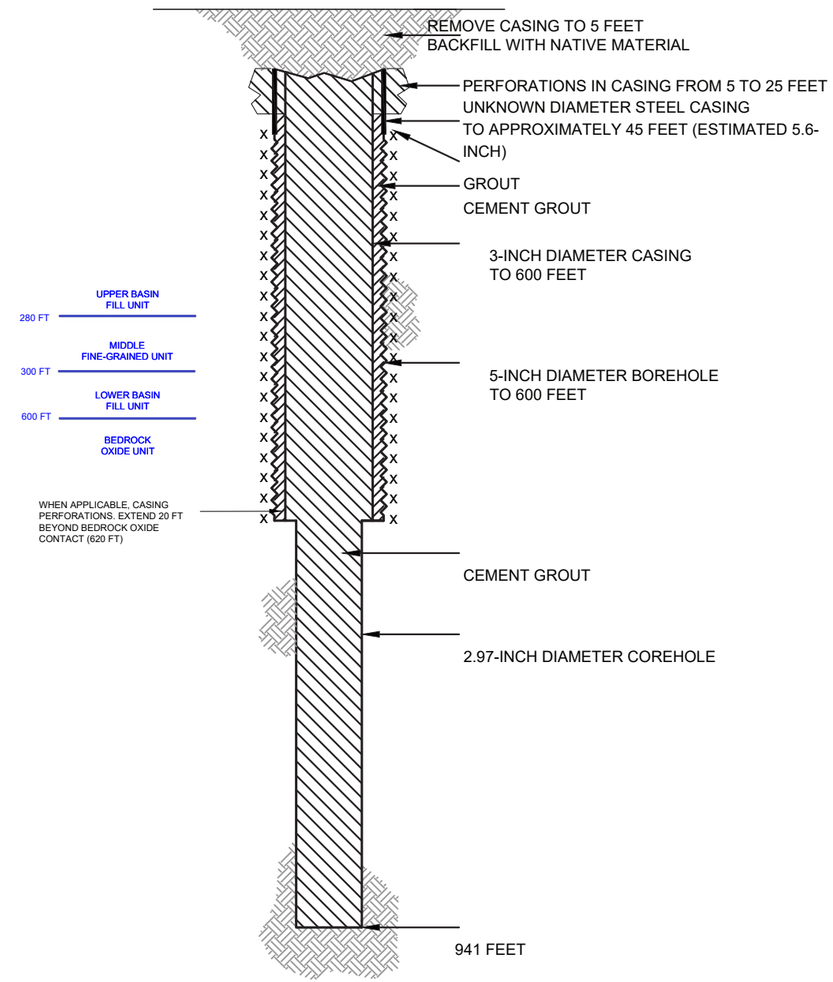
AS-BUILT COREHOLE MCC367



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC367



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC367 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC368

State	County
Arizona	Pinal

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

Latitude 33.04976349

Longitude -111.4330123

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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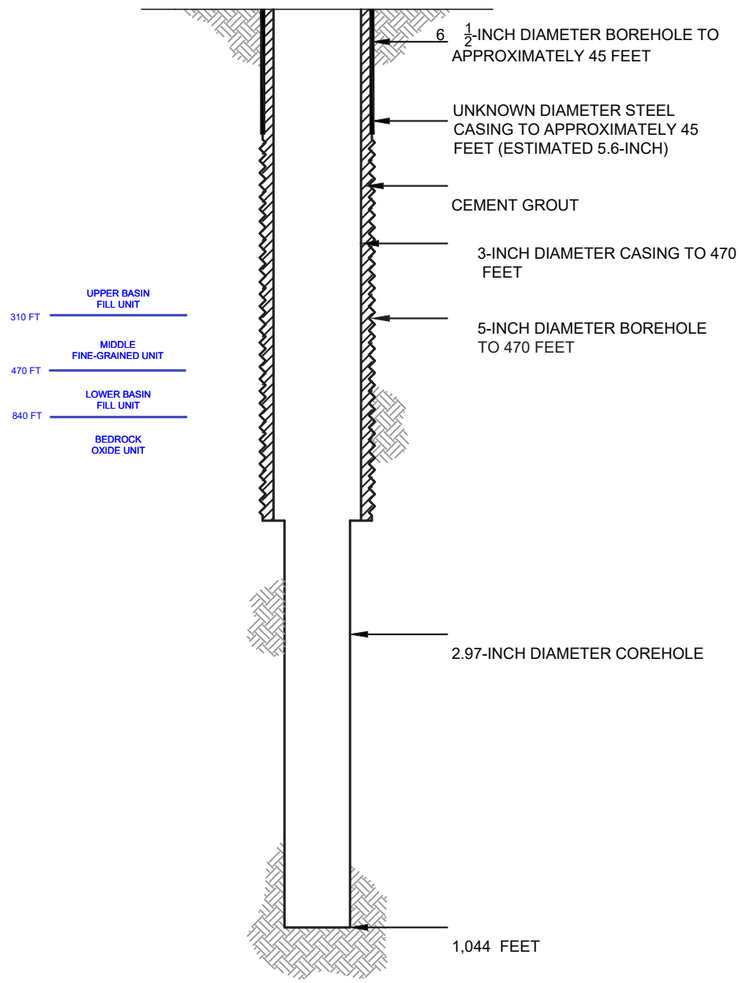
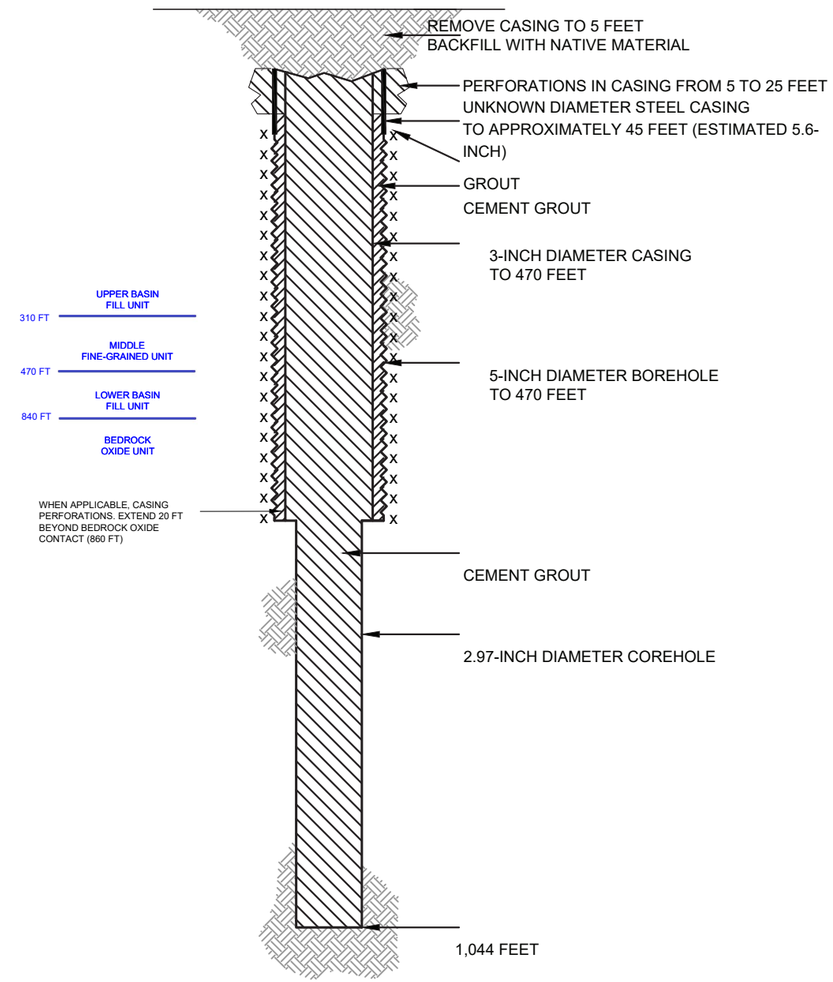
AS-BUILT COREHOLE MCC368



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC368



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC368 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC421

State	County
Arizona	Pinal

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

Surface Location

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

Latitude 33.04906935

Longitude -111.4327714

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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

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

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Dan Johnson, VP - General Manager		10/3/2019

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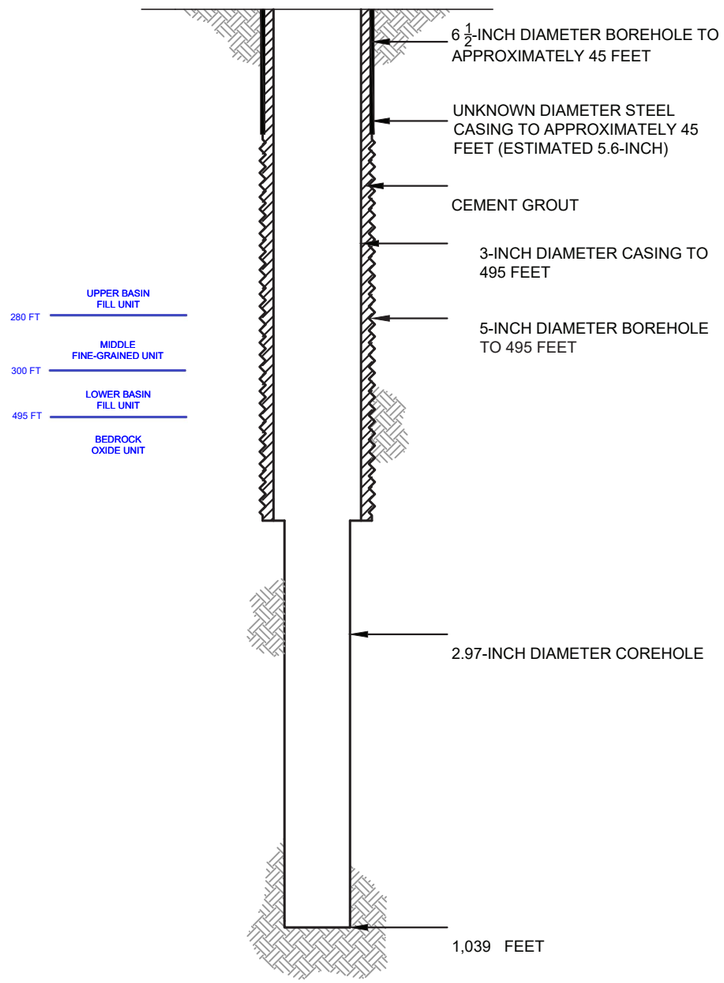
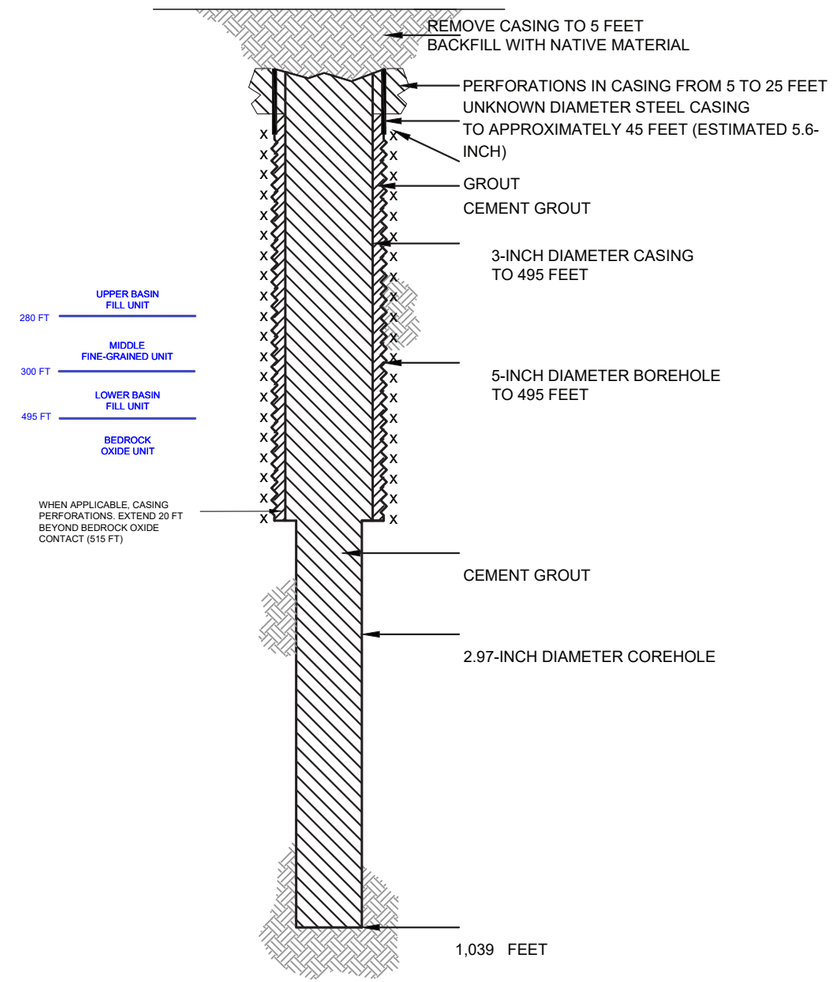
AS-BUILT COREHOLE MCC421



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC421



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC421 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC423

State	County
Arizona	Pinal

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

Latitude 33.0473769

Longitude -111.4313936

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Dan Johnson, VP - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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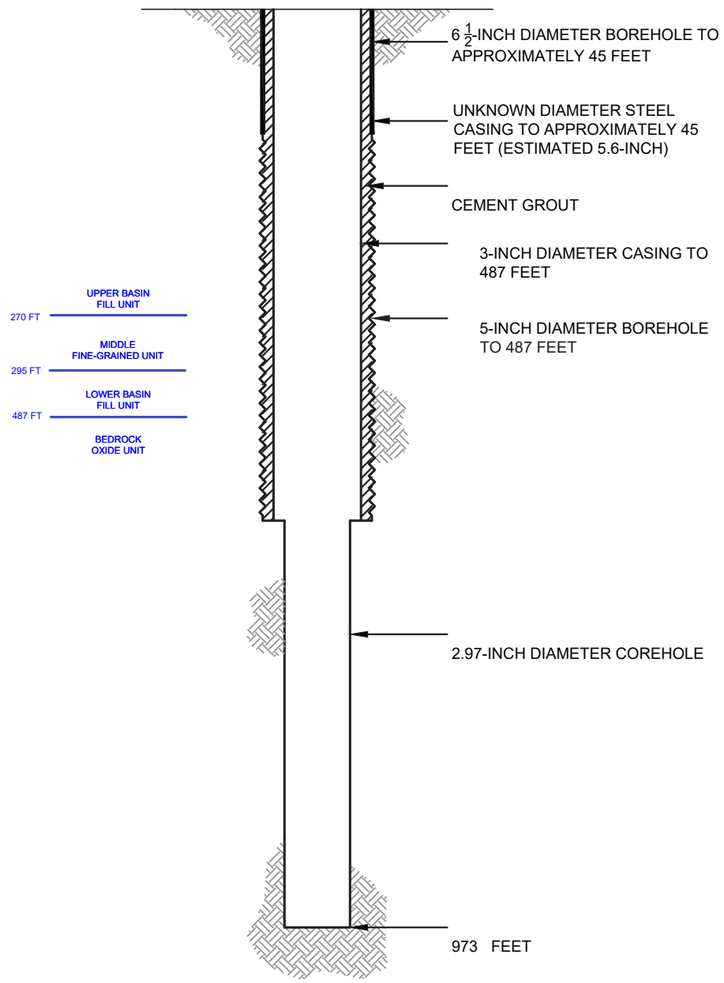
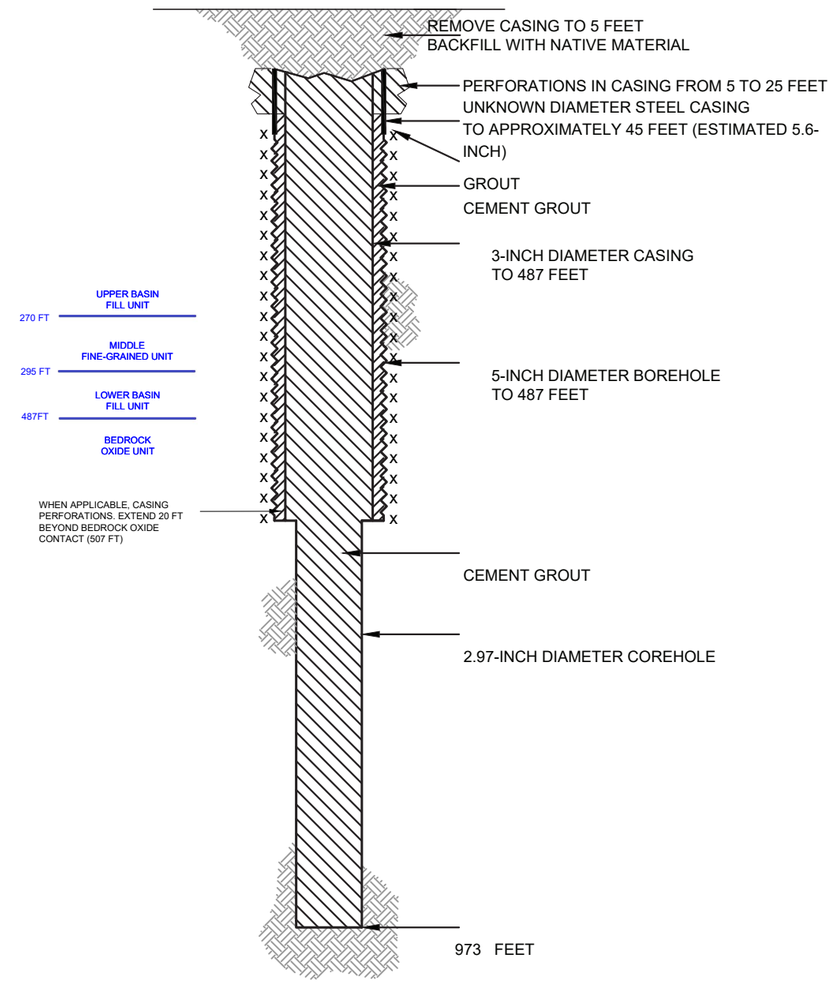
AS-BUILT COREHOLE MCC423



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC423



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC423 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC425

State	County
Arizona	Pinal

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

Latitude 33.04678025

Surface Location

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

Longitude -111.430989

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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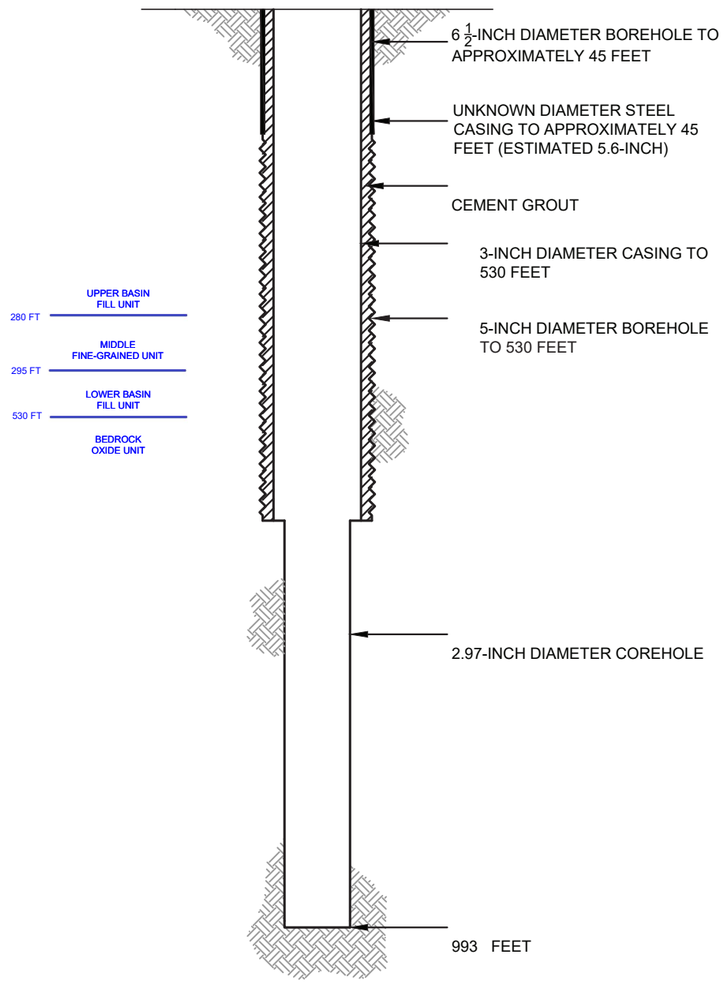
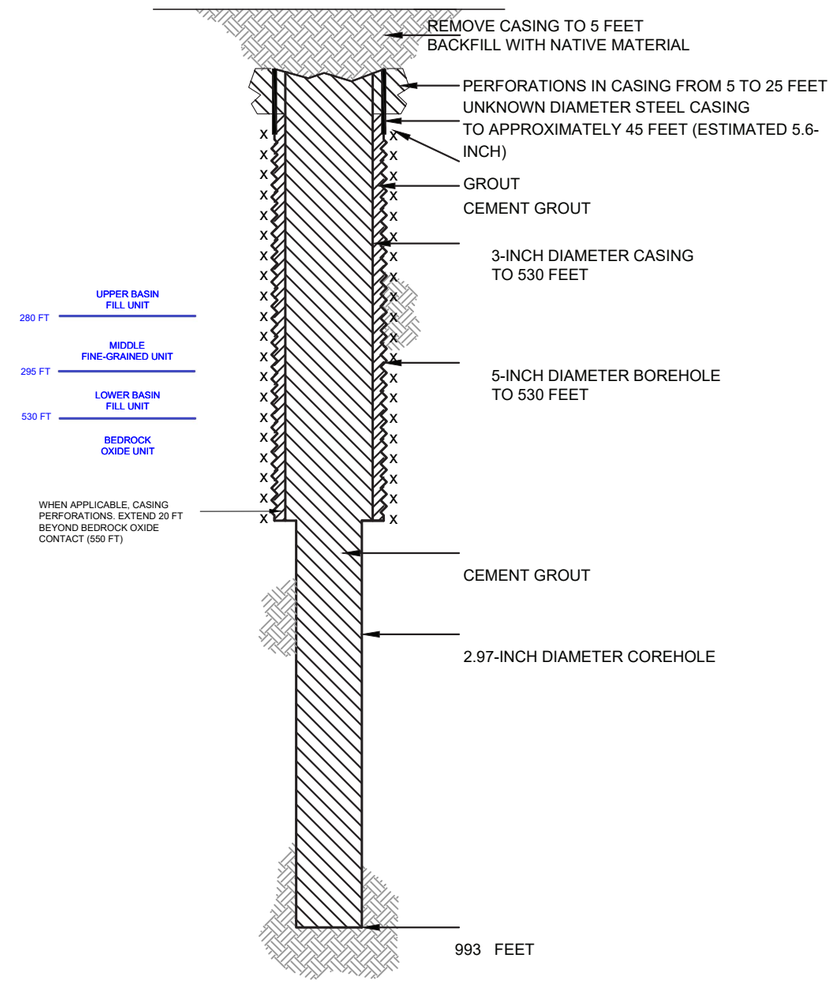
AS-BUILT COREHOLE MCC425



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC425



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC425 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC426

State	County
Arizona	Pinal

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

Latitude 33.04677707

Surface Location

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

Longitude -111.4301731

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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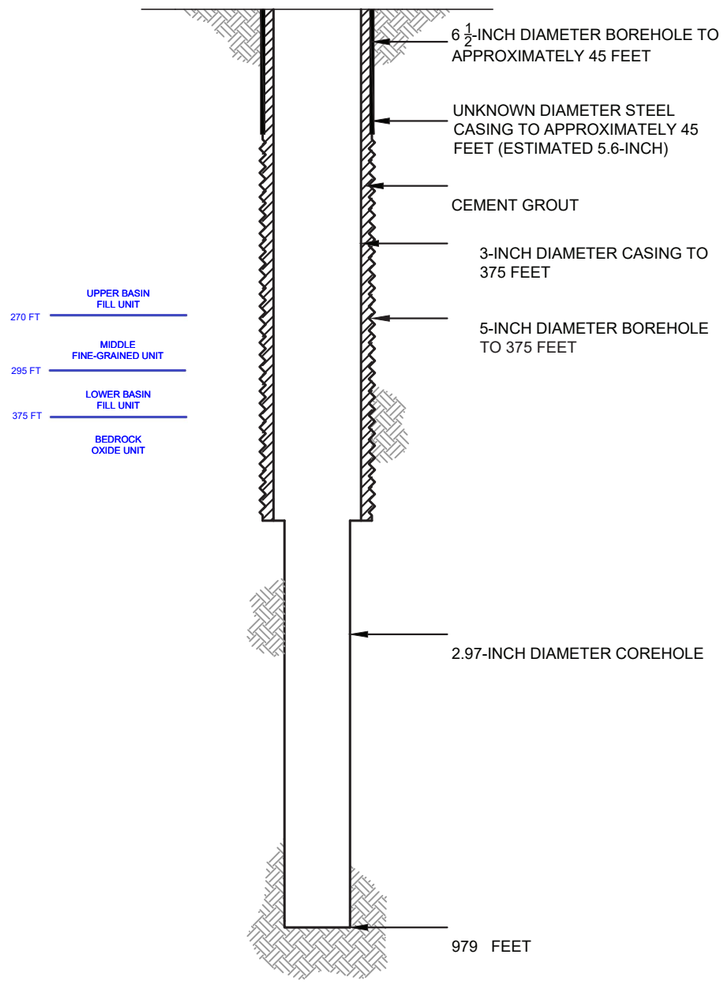
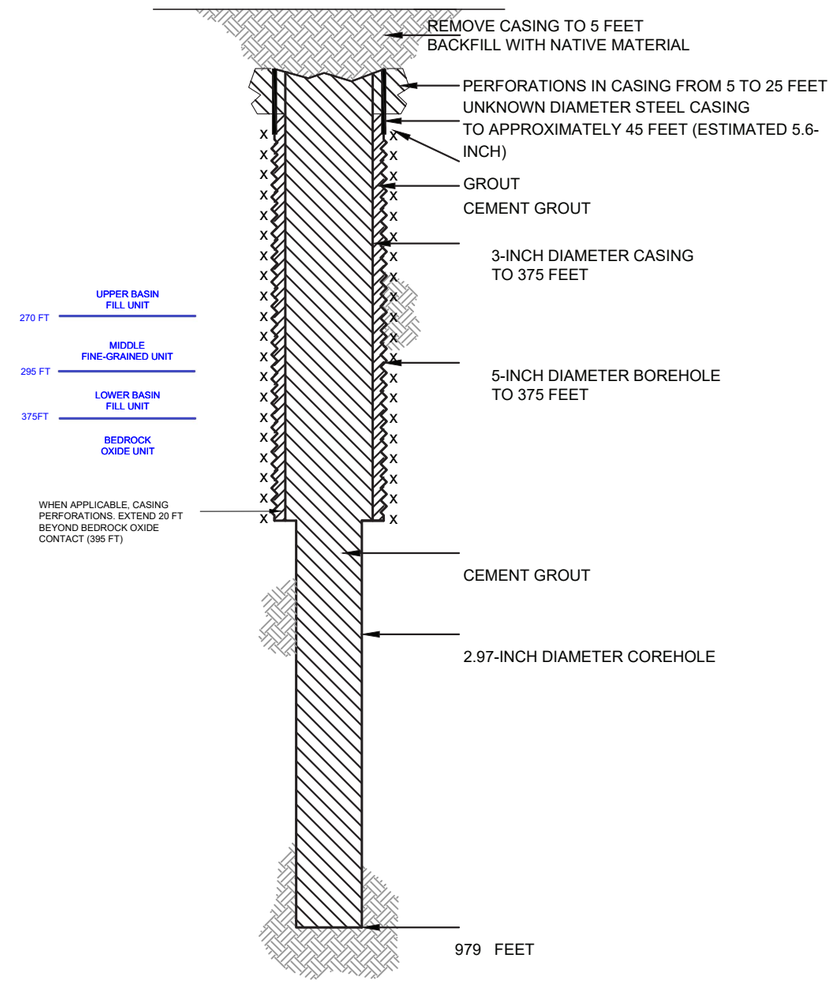
AS-BUILT COREHOLE MCC426



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC426



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC426 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC427

State	County
Arizona	Pinal

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

Latitude 33.04677389

Surface Location

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

Longitude -111.4293573

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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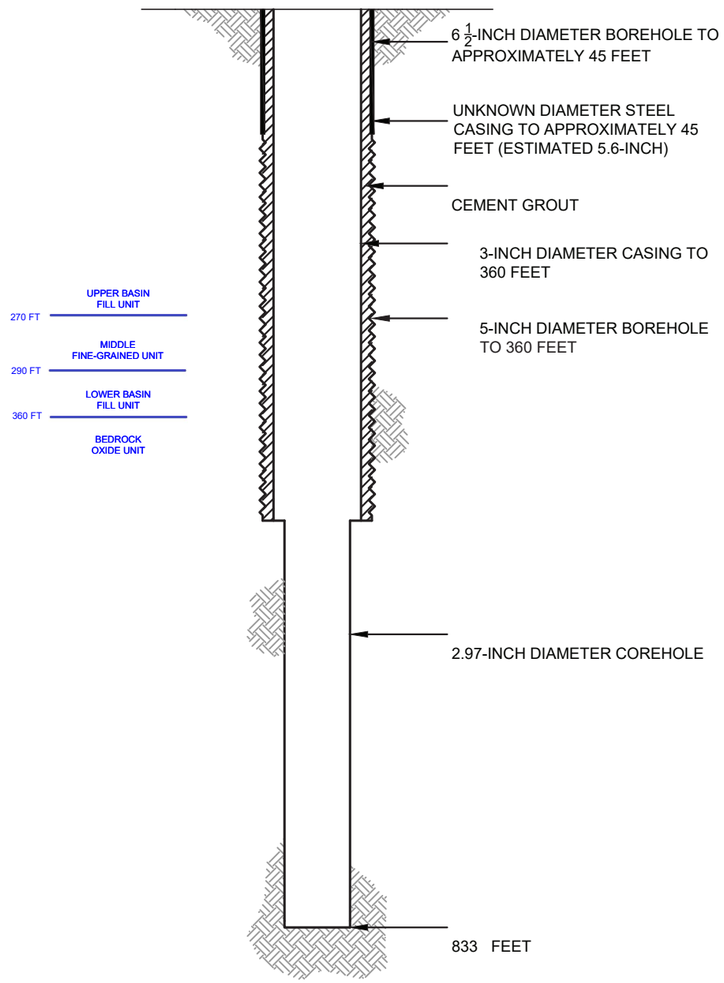
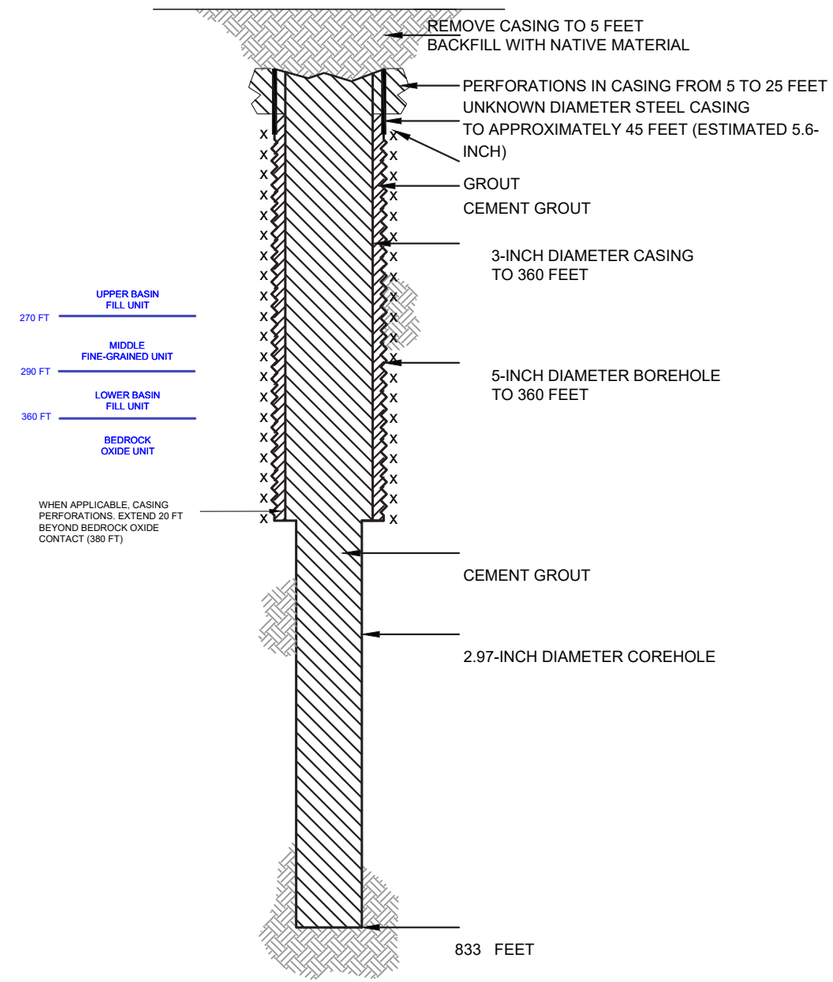
AS-BUILT COREHOLE MCC427



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC427



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC427 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC434

State	County
Arizona	Pinal

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

Latitude 33.0461836

Longitude -111.4305843

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP - General Manager		10/3/2019

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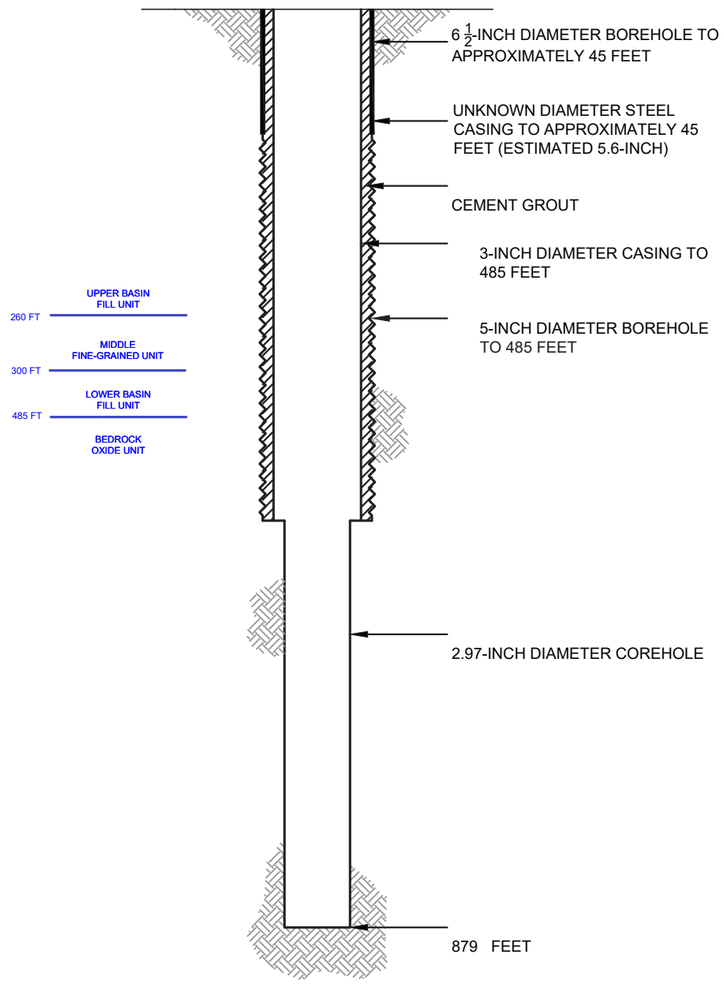
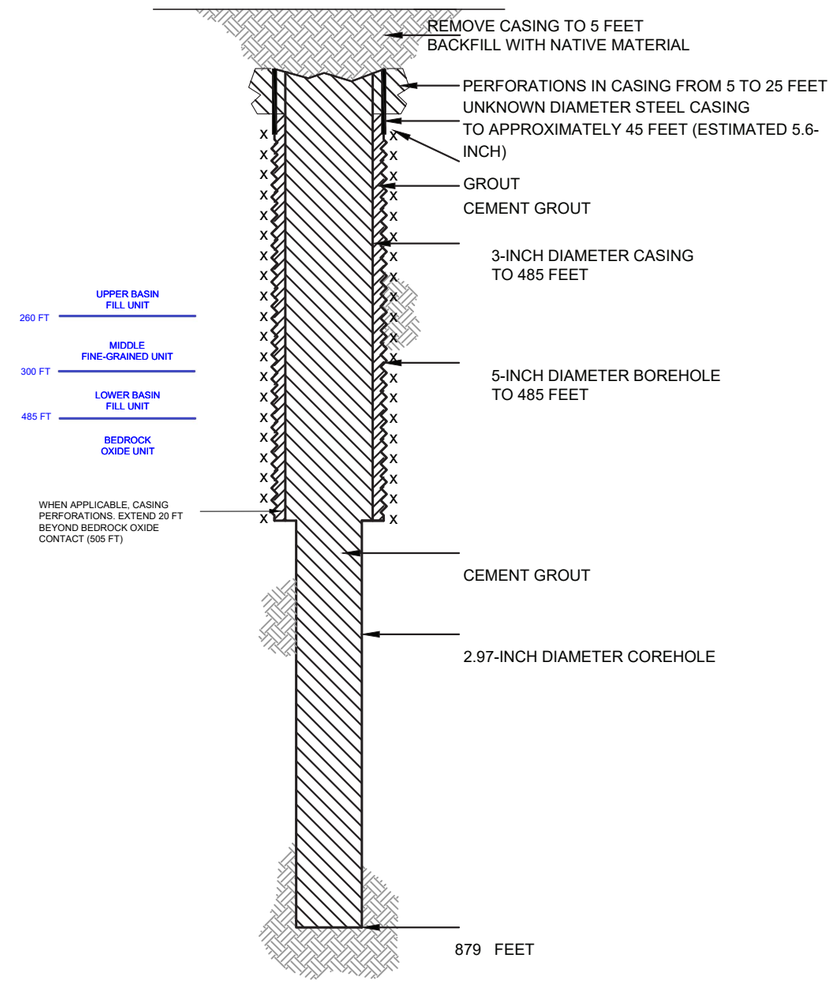
AS-BUILT COREHOLE MCC434



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC434



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC434 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC519

State	County
Arizona	Pinal

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

Latitude 33.05049953

Longitude -111.4271547

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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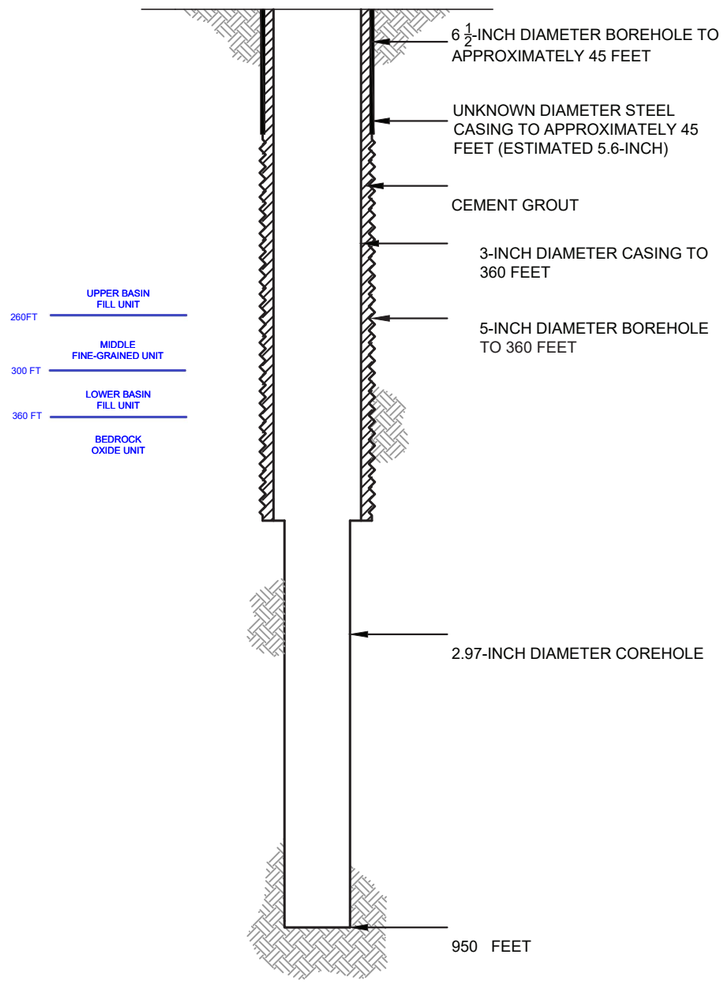
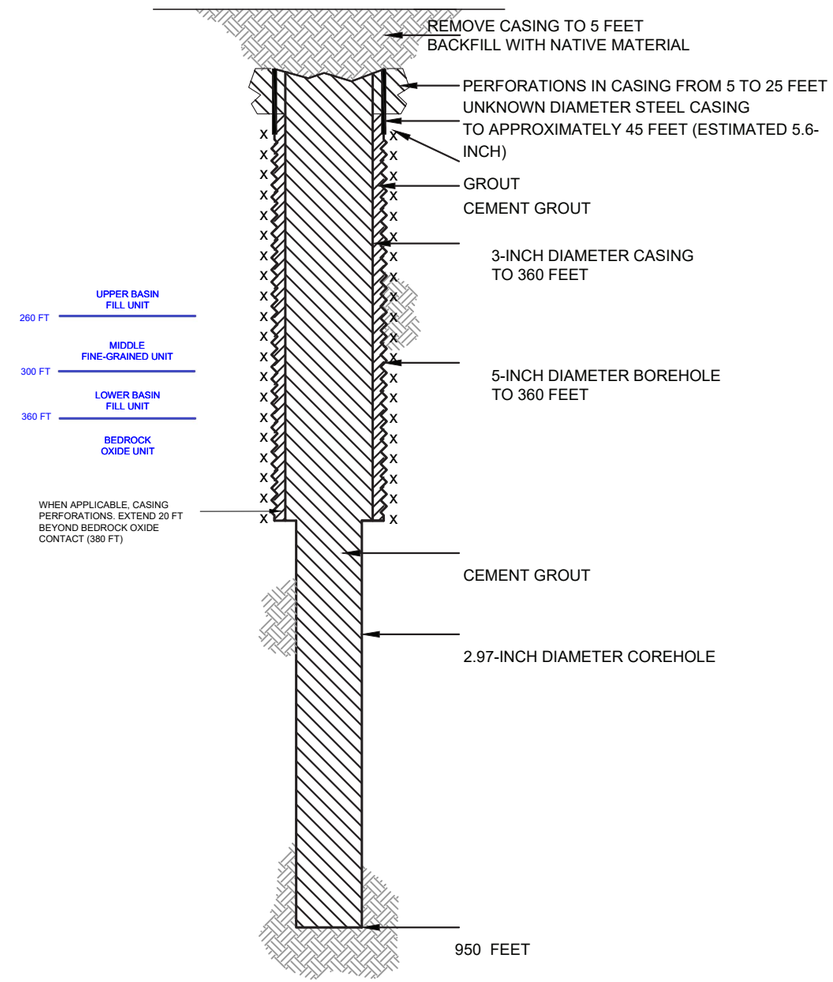
AS-BUILT COREHOLE MCC519



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC519



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC519 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC521

State	County
Arizona	Pinal

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

Latitude 33.05127871

Longitude -111.4364746

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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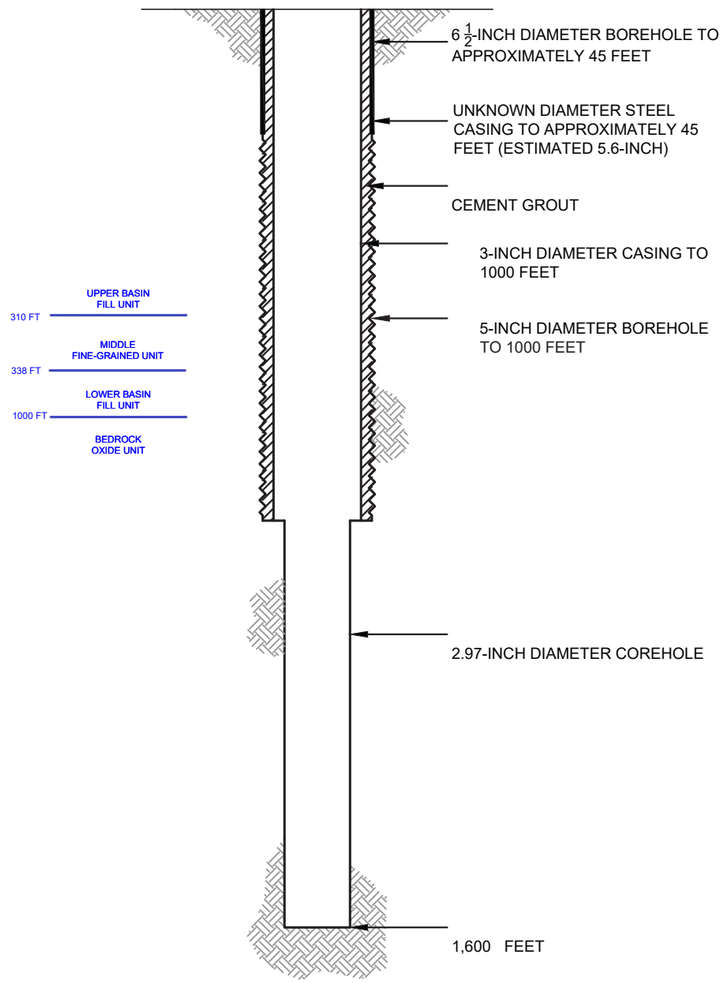
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

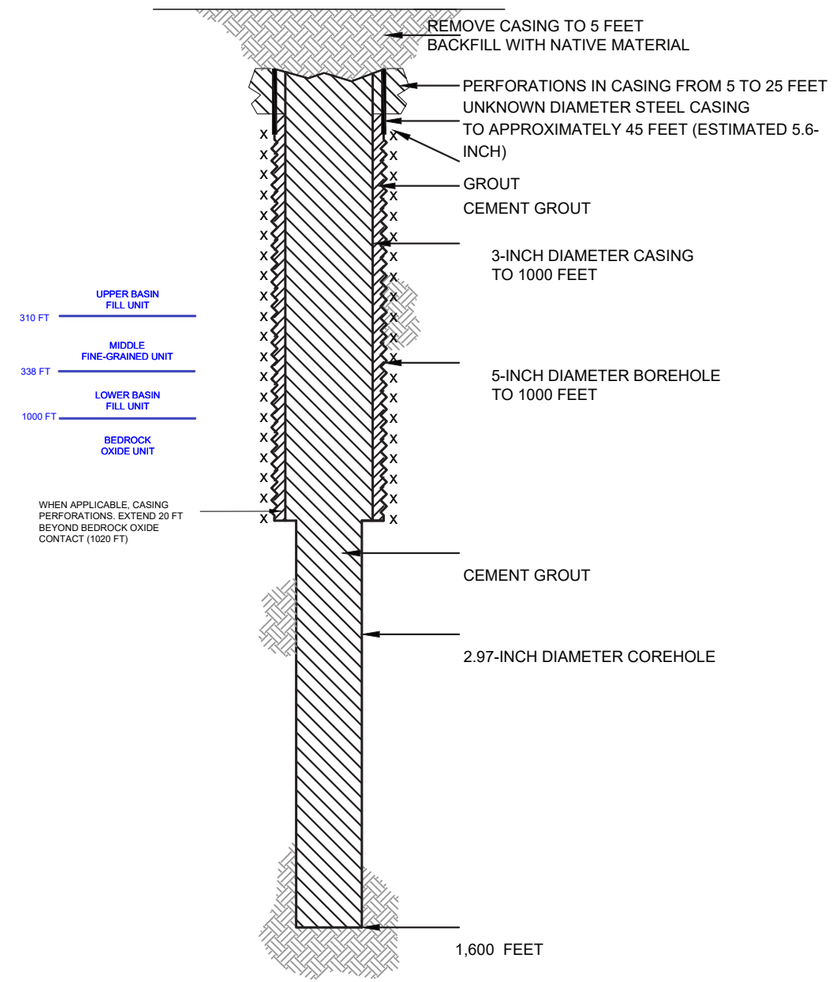
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE MCC521



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC521



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC521 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC523

State	County
Arizona	Pinal

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

Latitude 33.05127275

Longitude -111.4320909

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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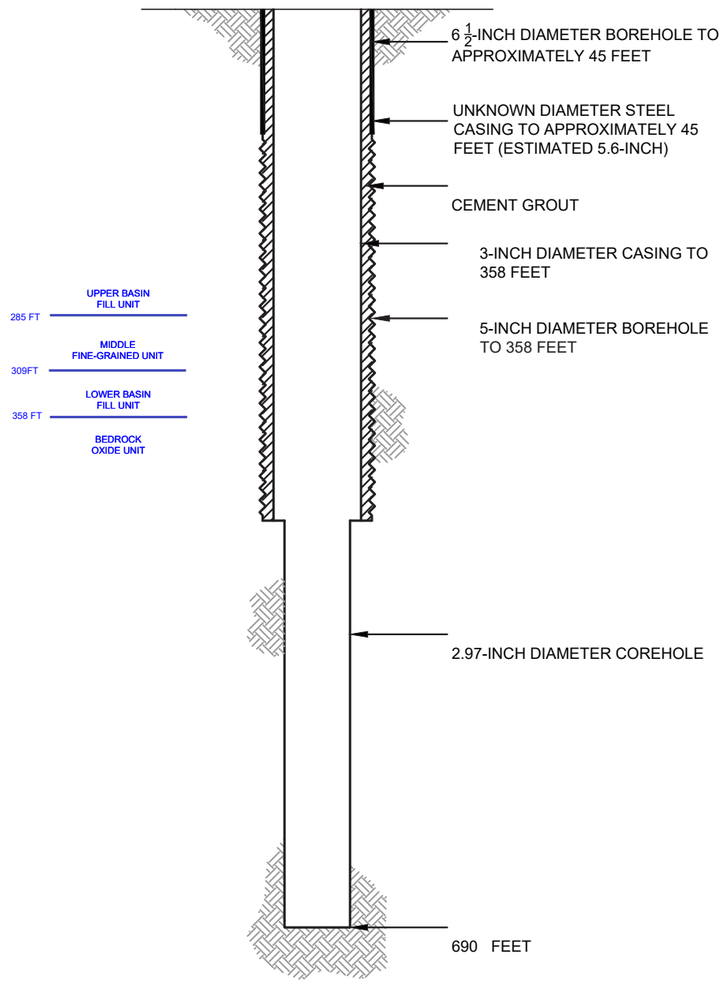
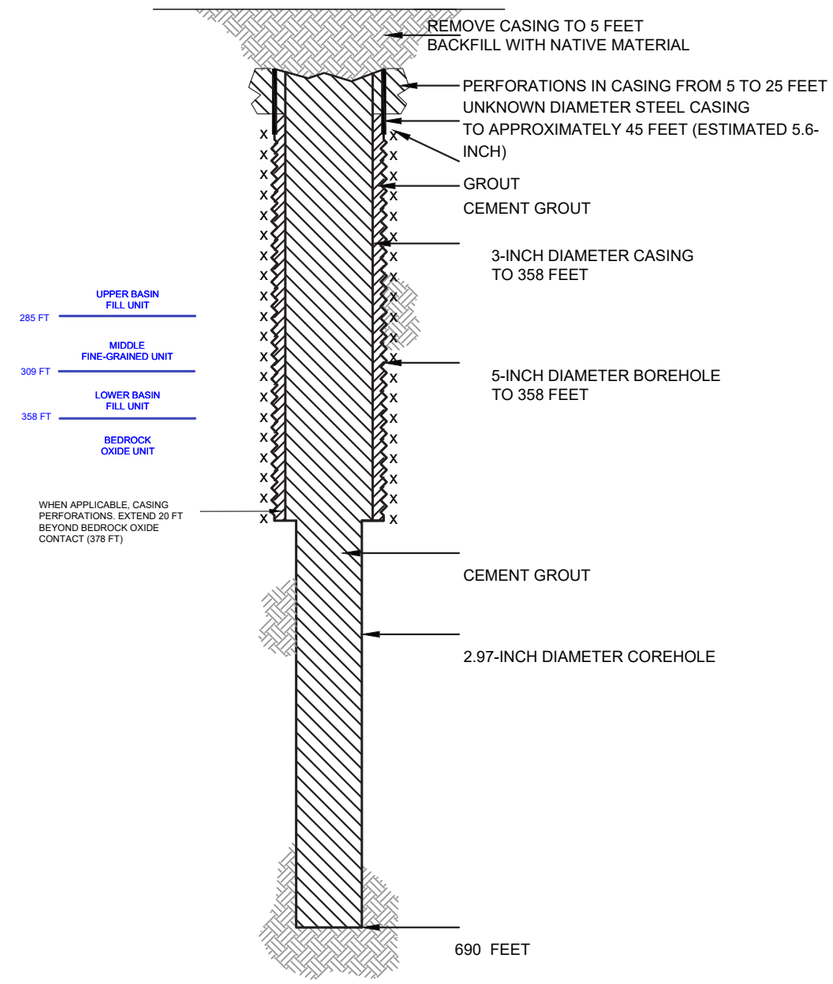
AS-BUILT COREHOLE MCC523



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC523



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC523 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC524

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_____ **ft. from (N/S)** _____ **Line of quarter section**

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For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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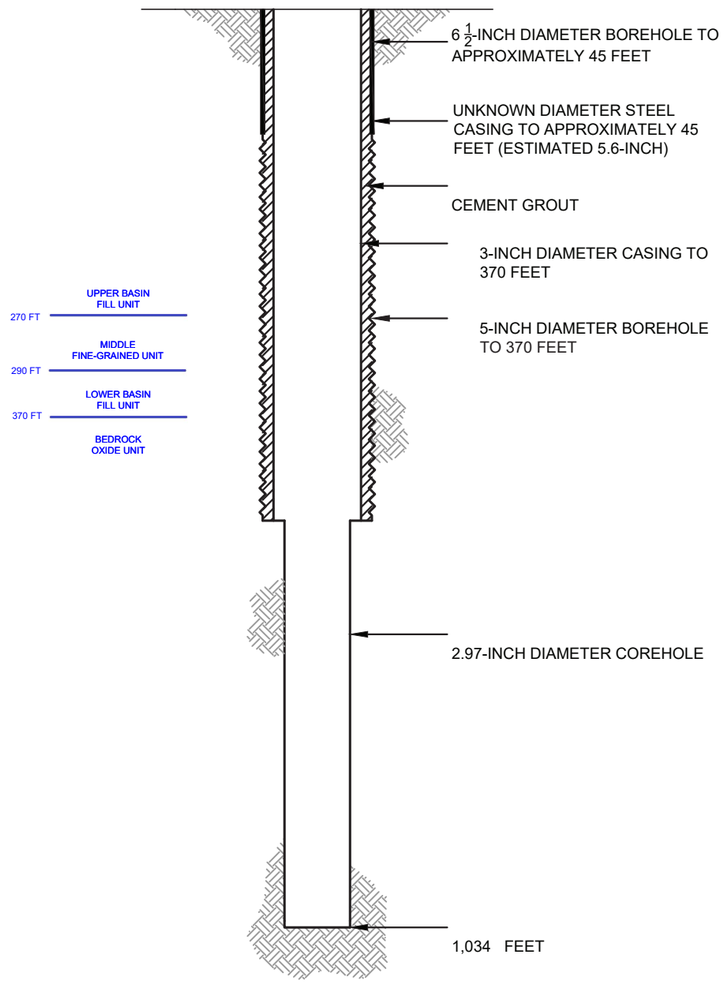
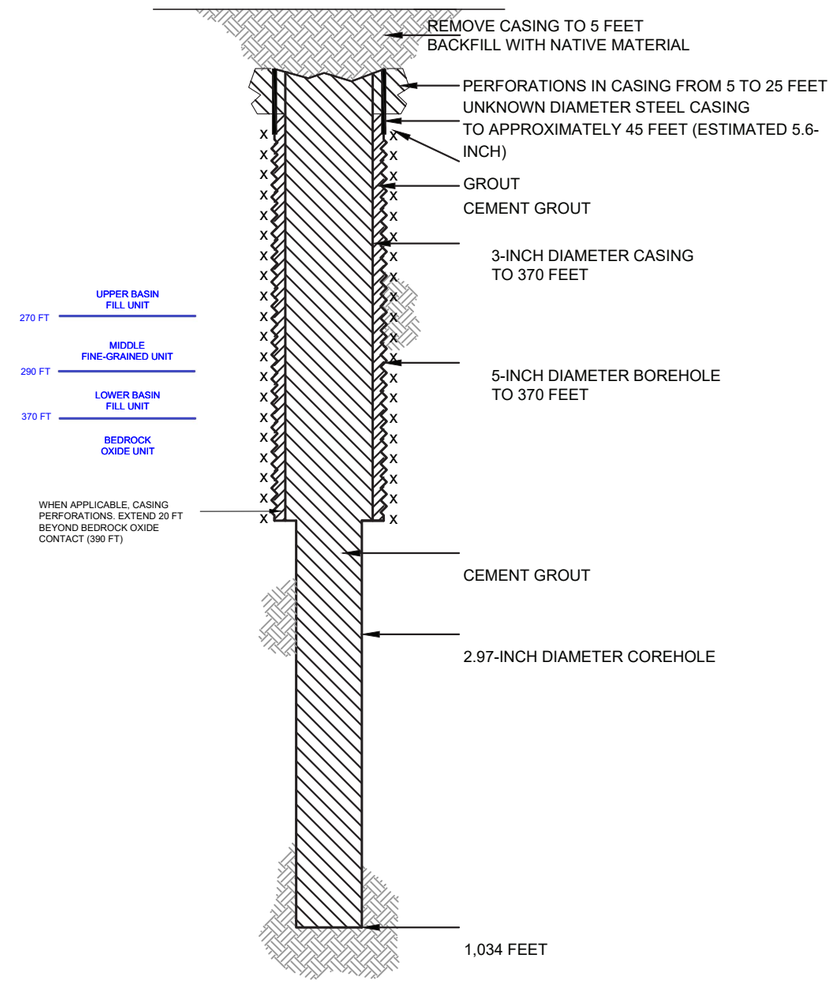
AS-BUILT COREHOLE MCC524



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC524



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC524 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC525

State	County
Arizona	Pinal

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

Latitude 33.05035796

Longitude -111.4338491

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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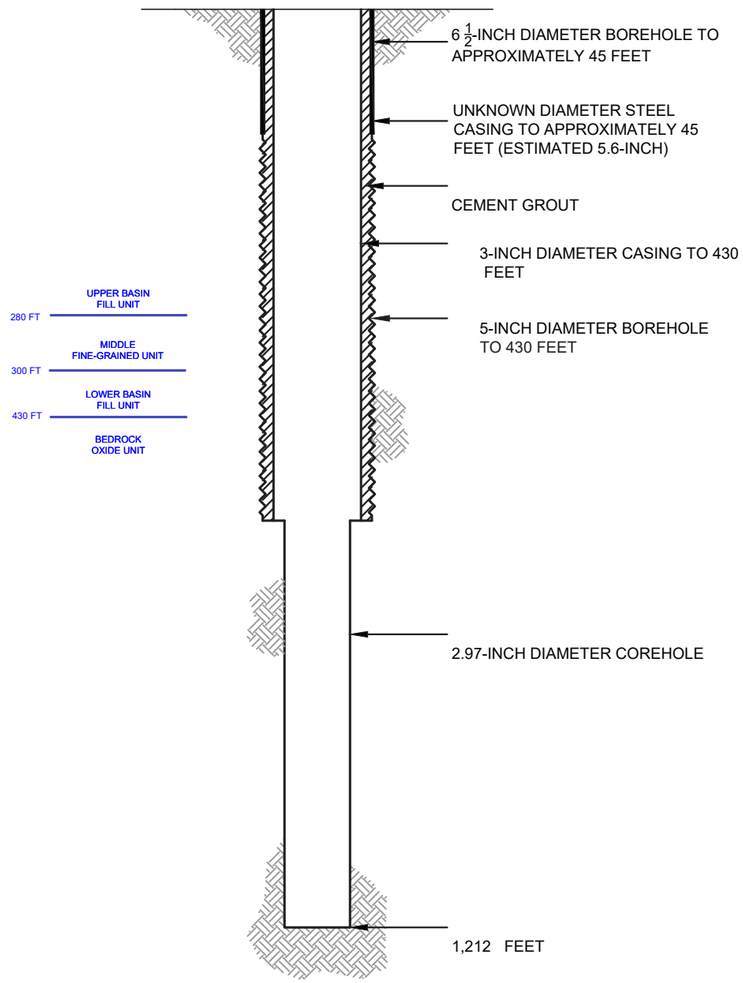
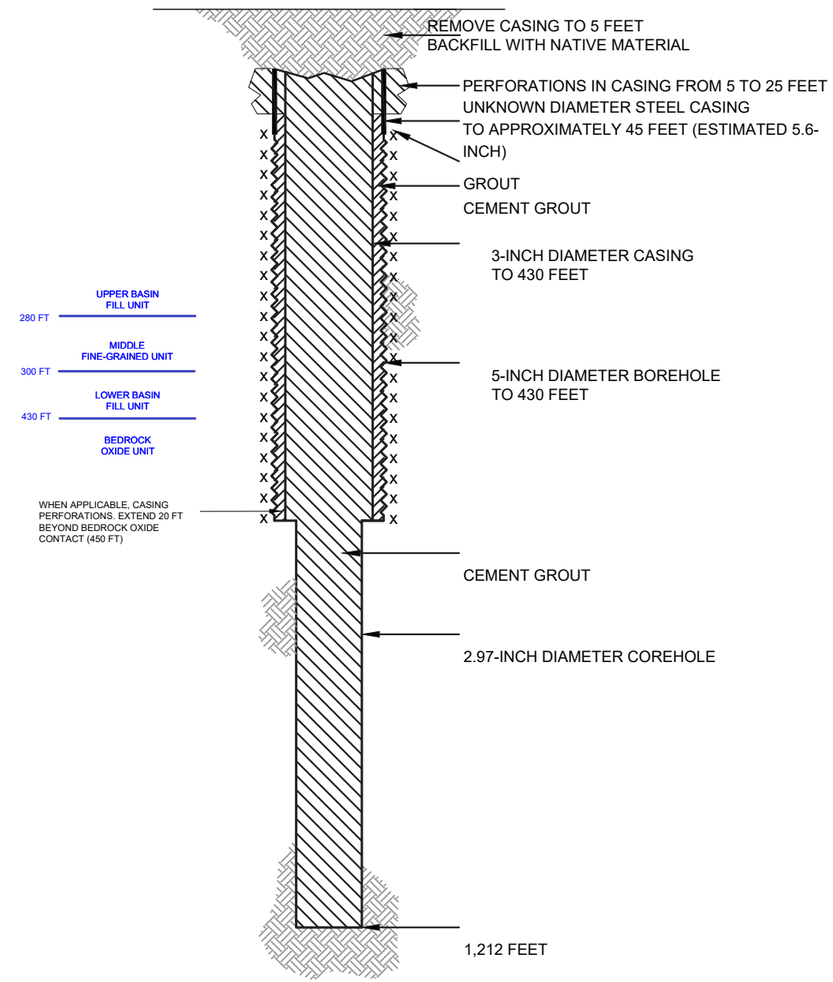
AS-BUILT COREHOLE MCC525



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC525



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC525 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC526

State	County
Arizona	Pinal

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

Latitude 33.05127956

Longitude -111.4296771

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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Dan Johnson, VP - General Manager		10/3/2019

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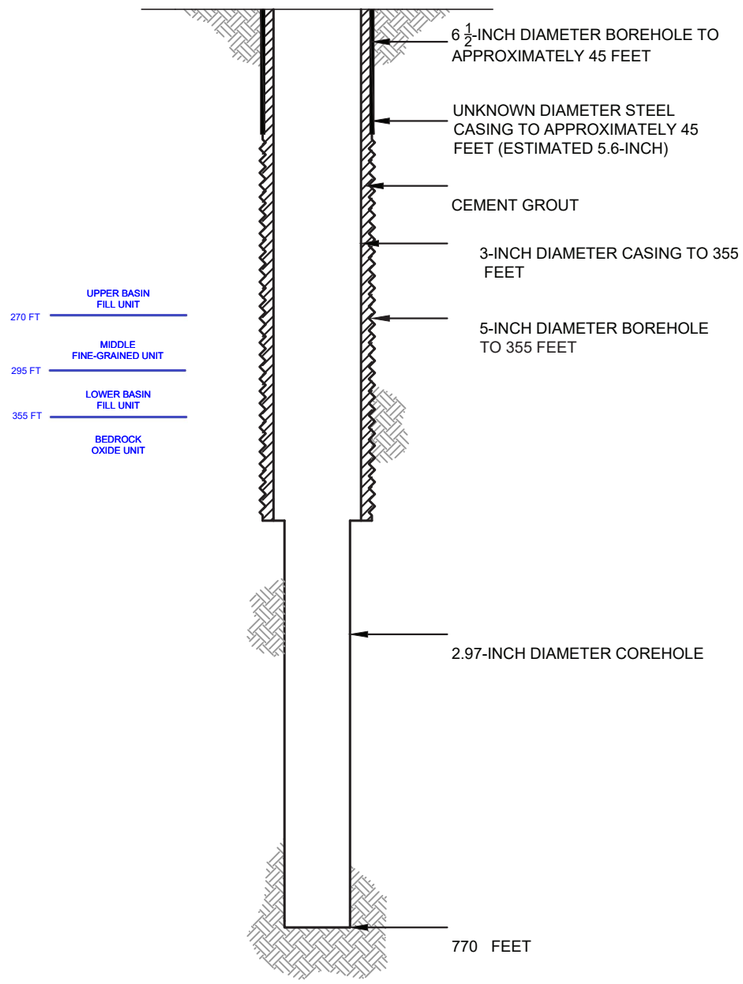
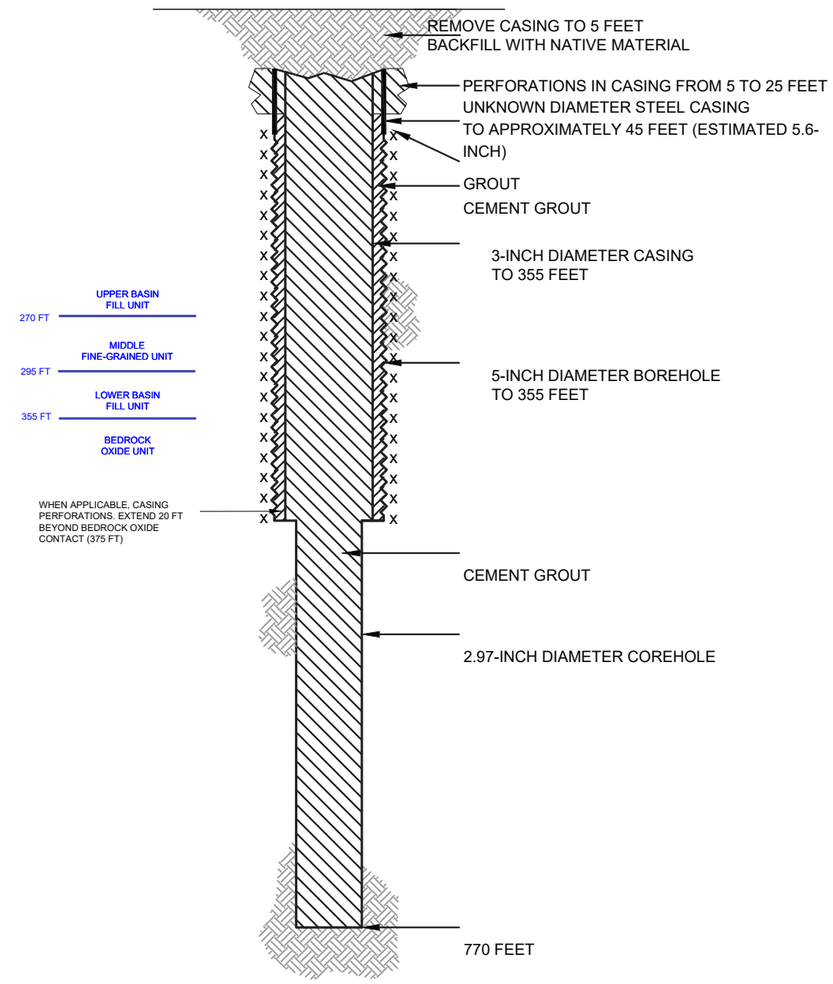
AS-BUILT COREHOLE MCC526



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC526



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC526 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC527

State	County
Arizona	Pinal

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

Latitude 33.04975493

Longitude -111.4277848

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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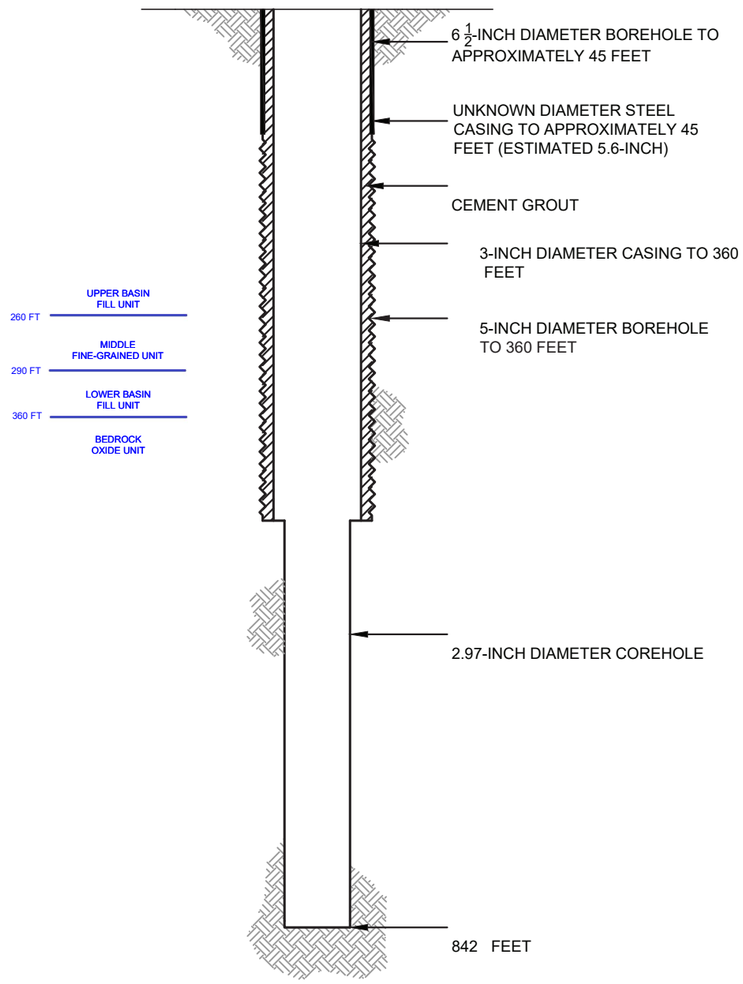
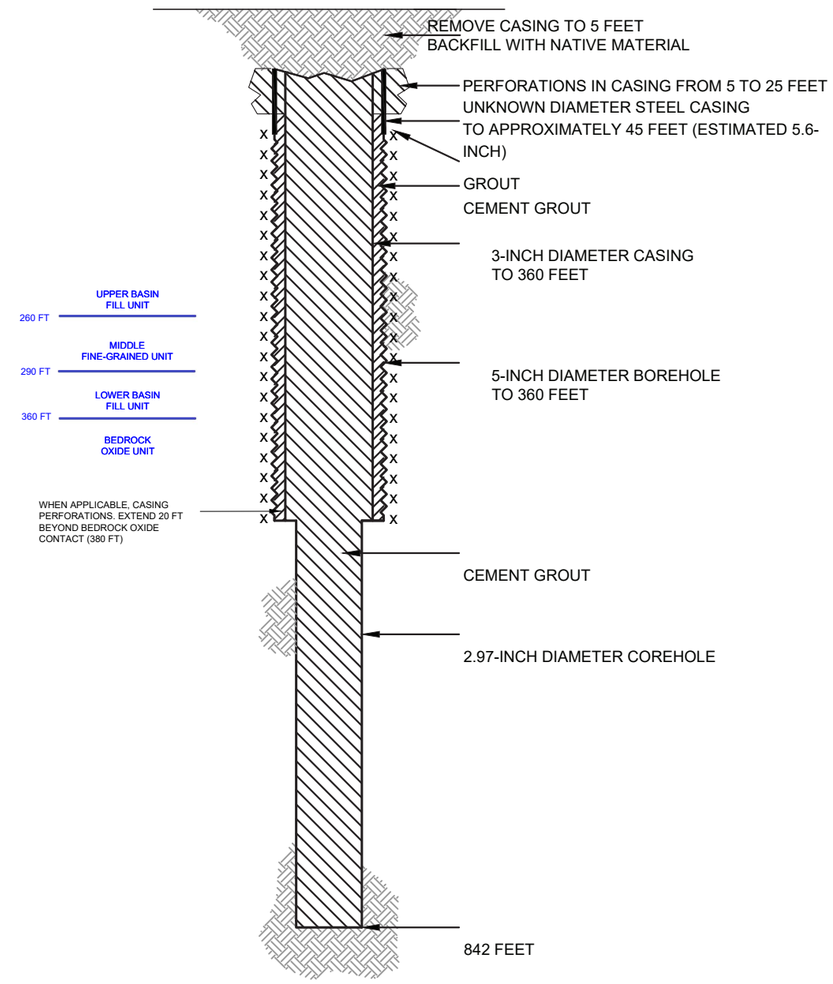
AS-BUILT COREHOLE MCC527



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC527



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC527 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC531

State	County
Arizona	Pinal

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

Latitude 33.04854907

Longitude -111.428125

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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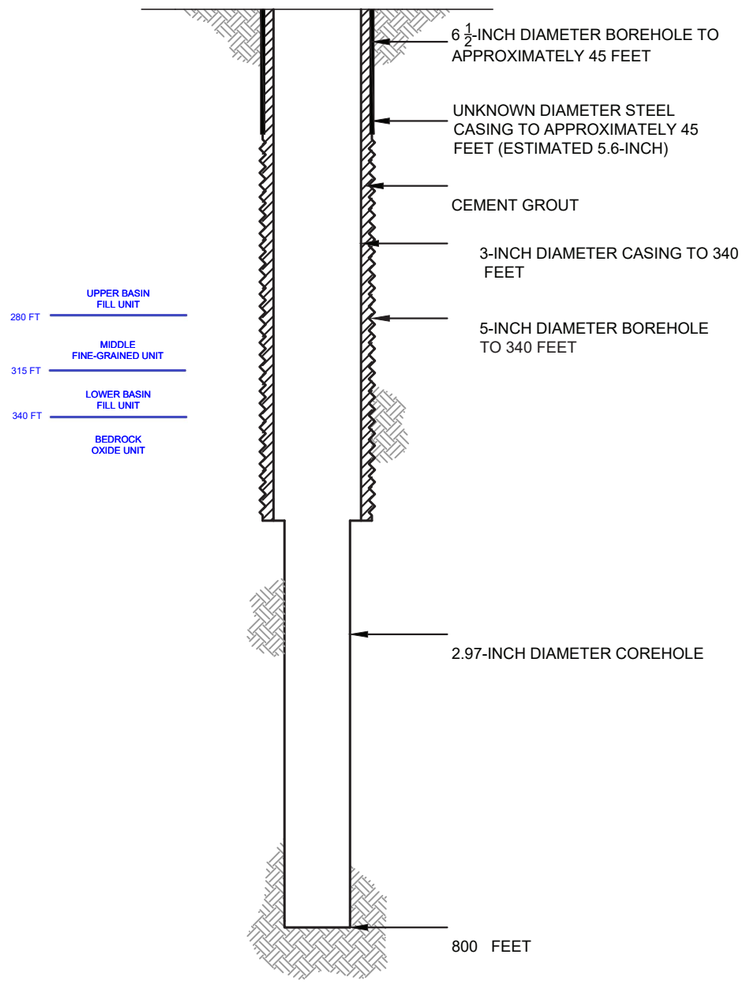
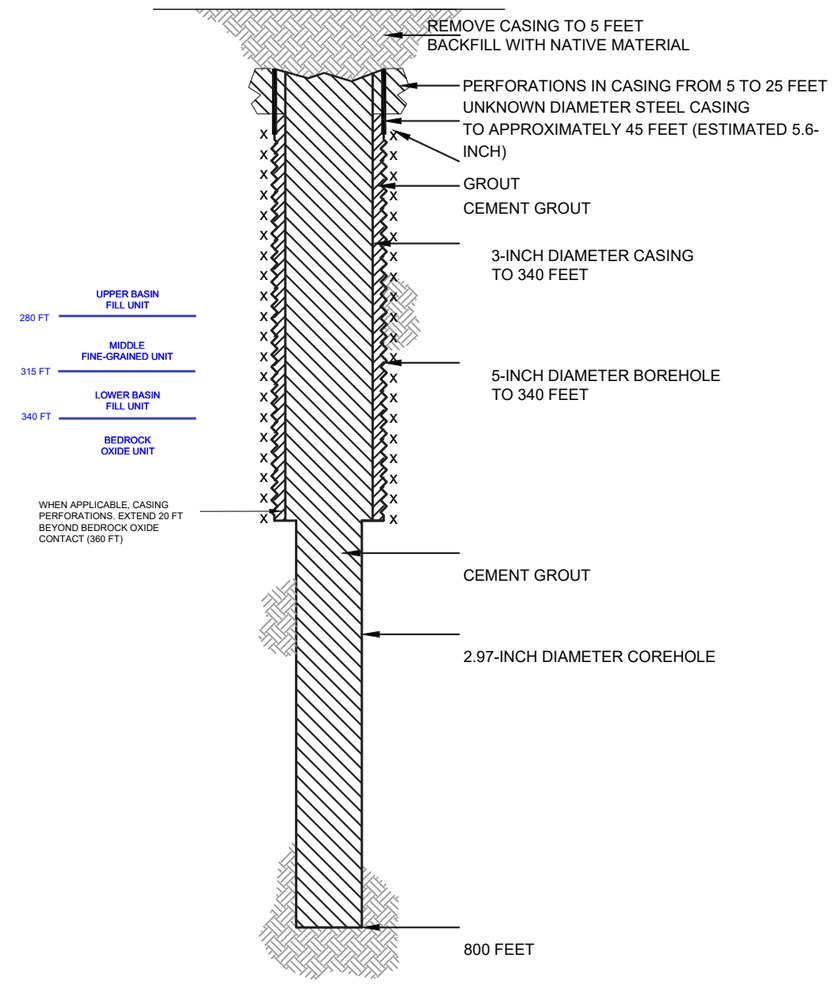
AS-BUILT COREHOLE MCC531



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC531



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC531 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC532

State	County
Arizona	Pinal

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

Latitude 33.04618705

Longitude -111.4314015

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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Dan Johnson, VP - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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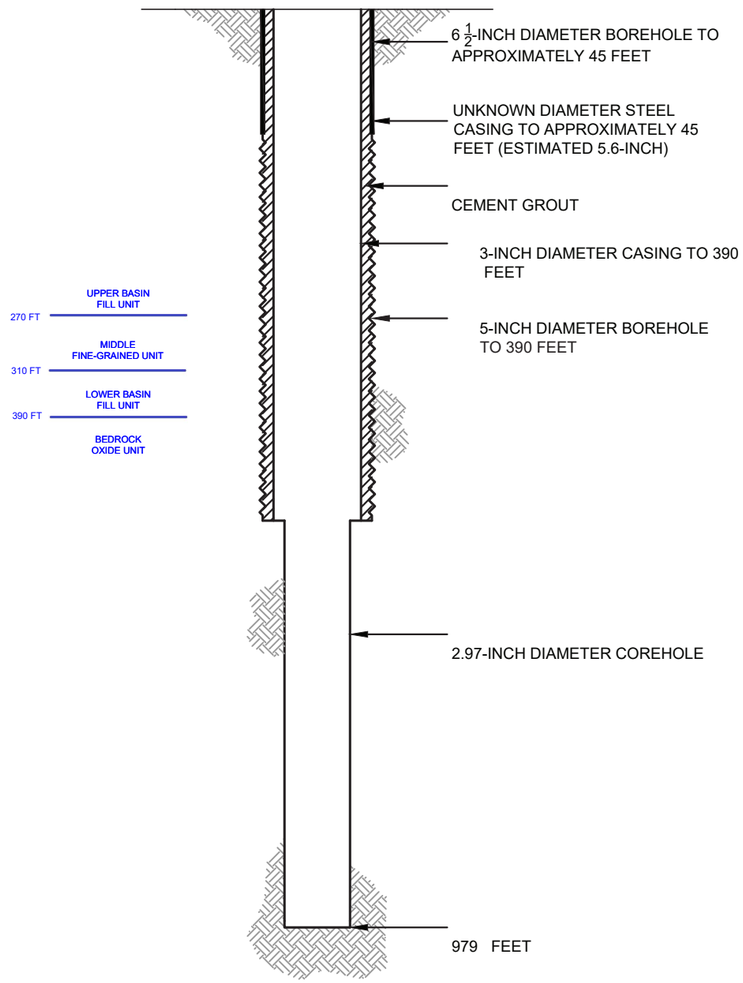
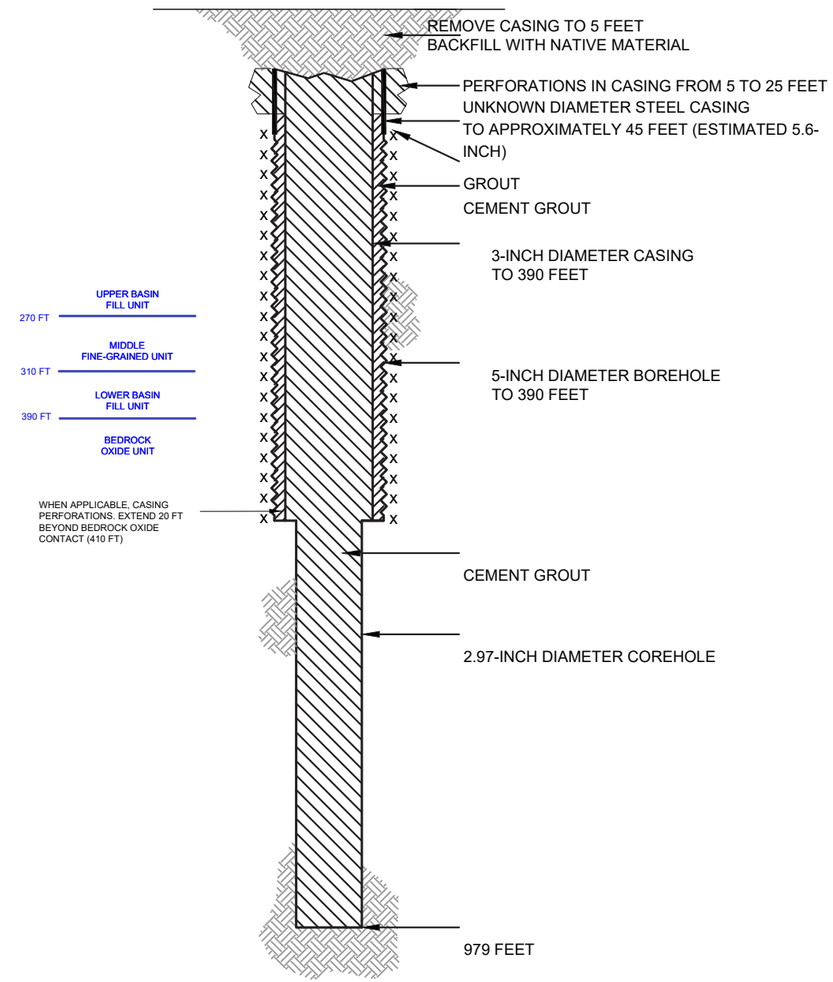
AS-BUILT COREHOLE MCC532



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC532



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC532 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC533

State	County
Arizona	Pinal

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

Latitude 33.04863601

Longitude -111.4325897

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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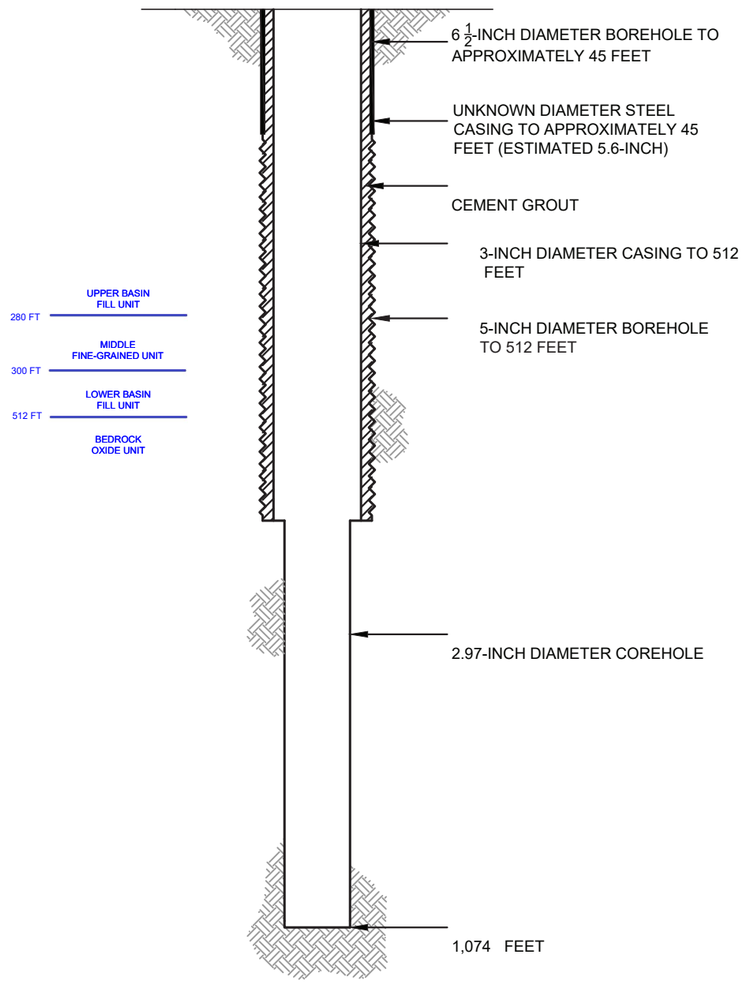
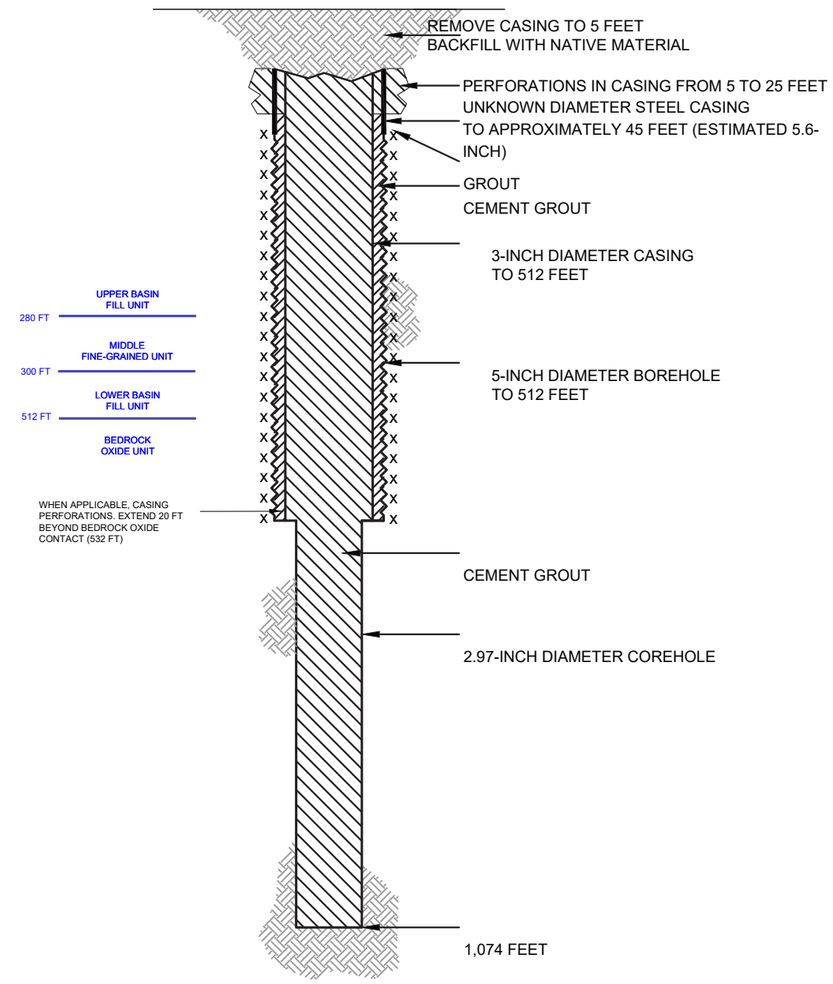
AS-BUILT COREHOLE MCC533



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC533



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC533 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC534

State	County
Arizona	Pinal

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

Latitude 33.04719348

Longitude -111.4291167

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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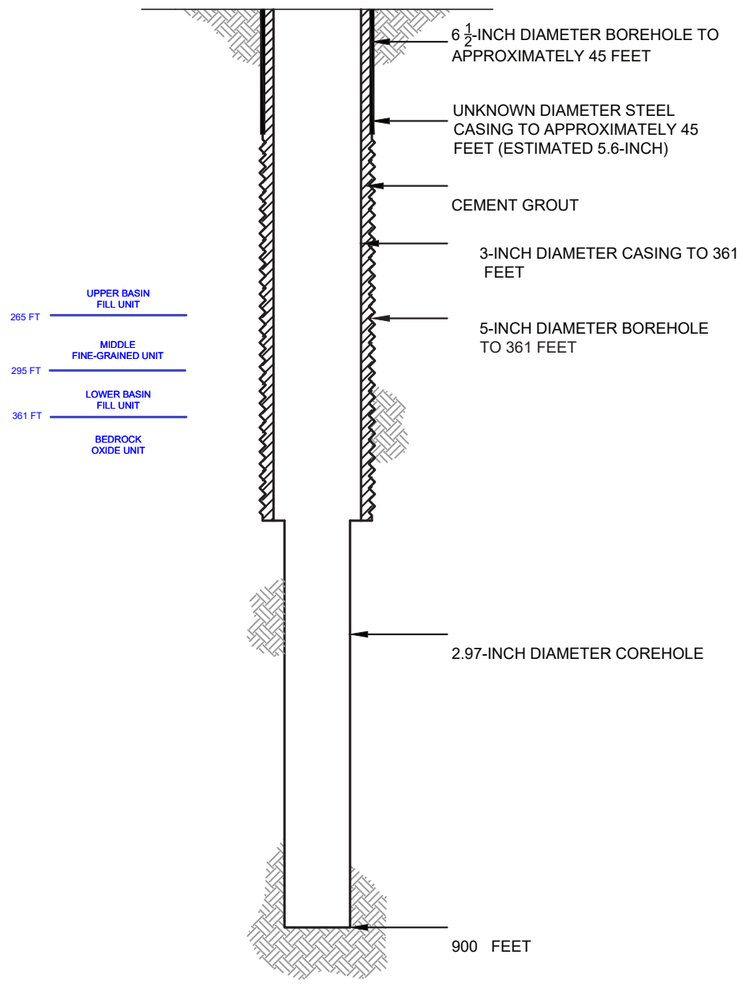
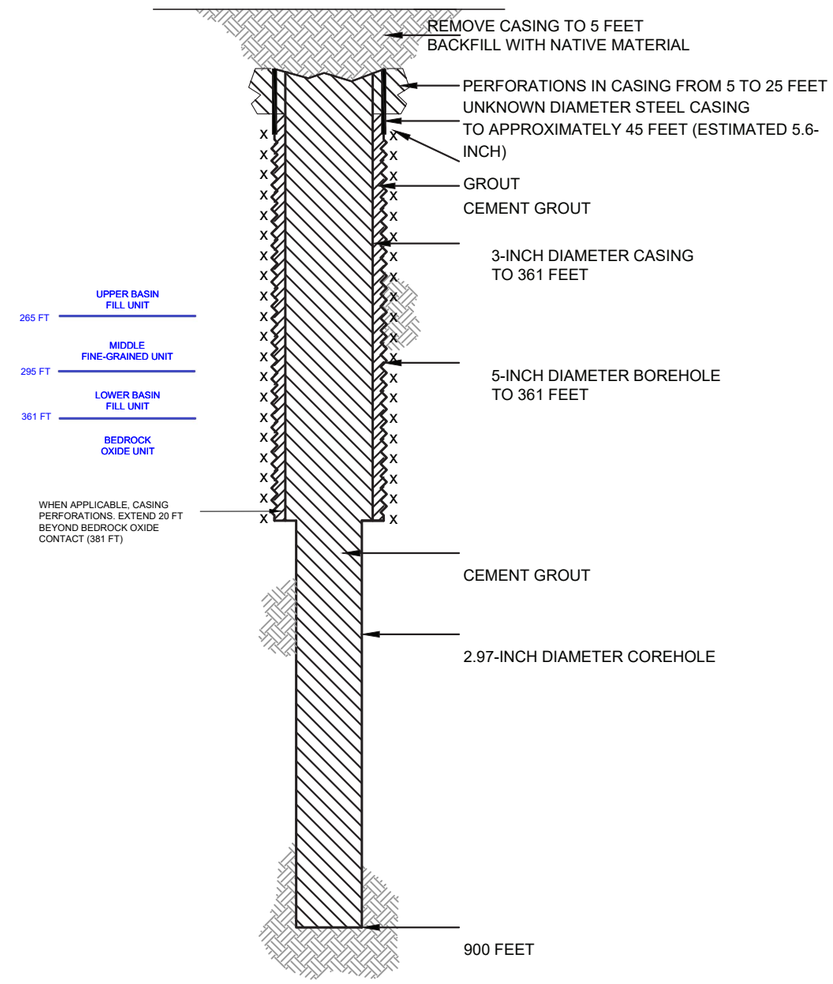
AS-BUILT COREHOLE MCC534



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC534



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC534 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC536

State	County
Arizona	Pinal

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

Latitude 33.04908843

Longitude -111.4337229

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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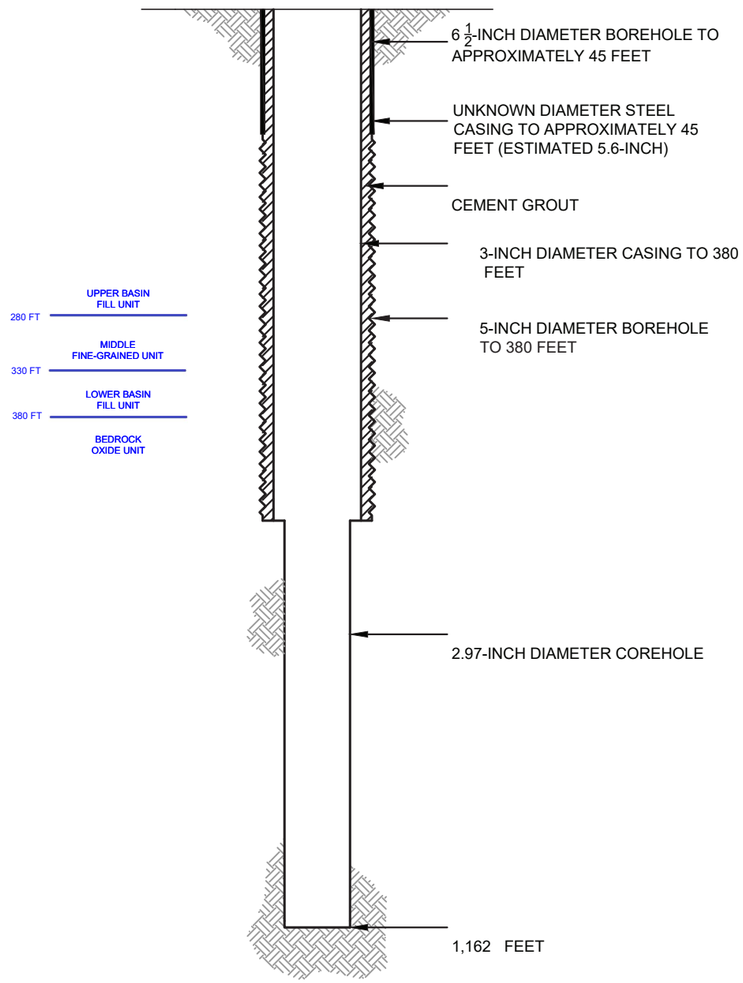
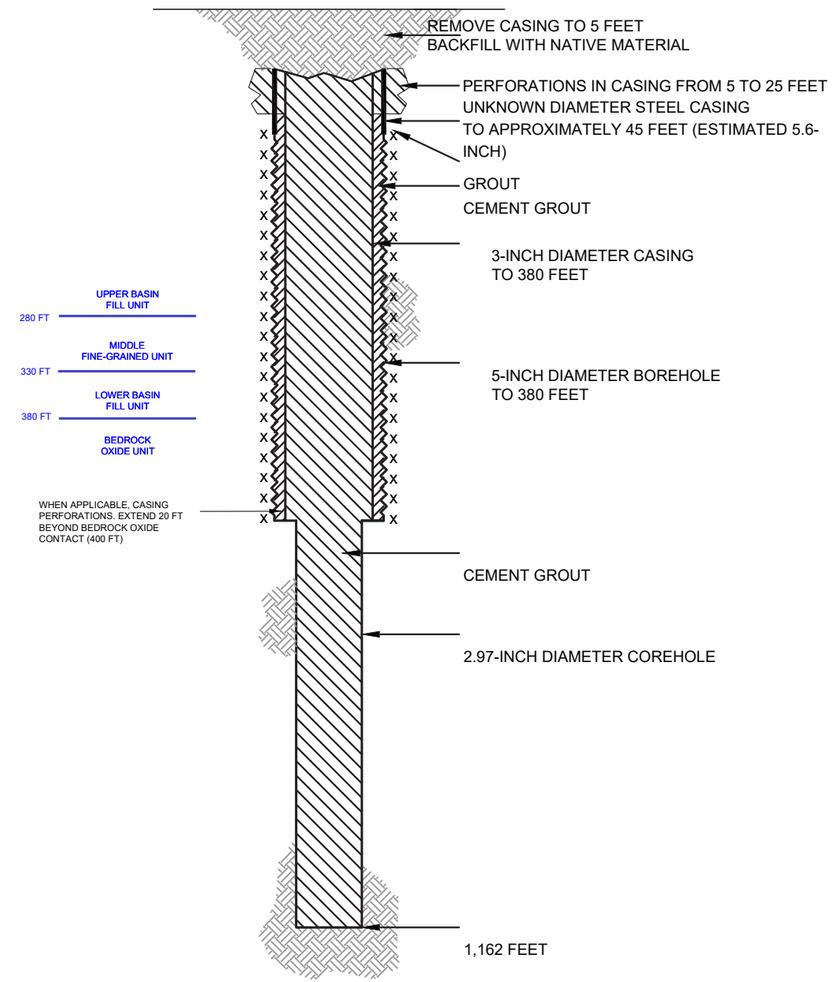
AS-BUILT COREHOLE MCC536



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC536



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC536 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

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R9UIC-AZ3-FY11-1		MCC537

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_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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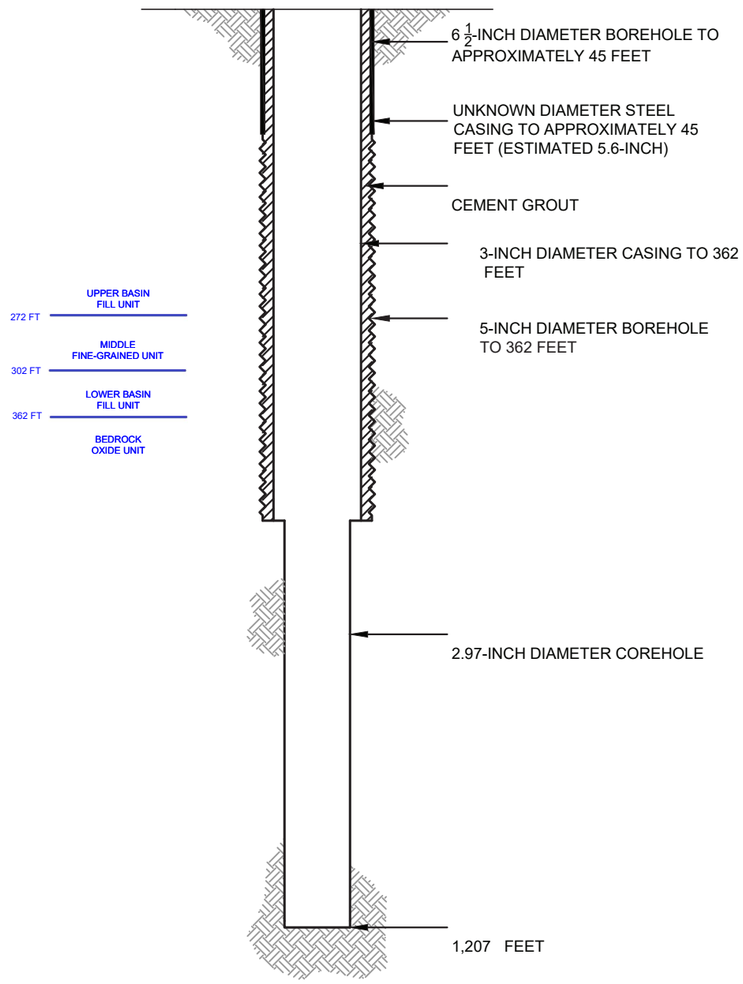
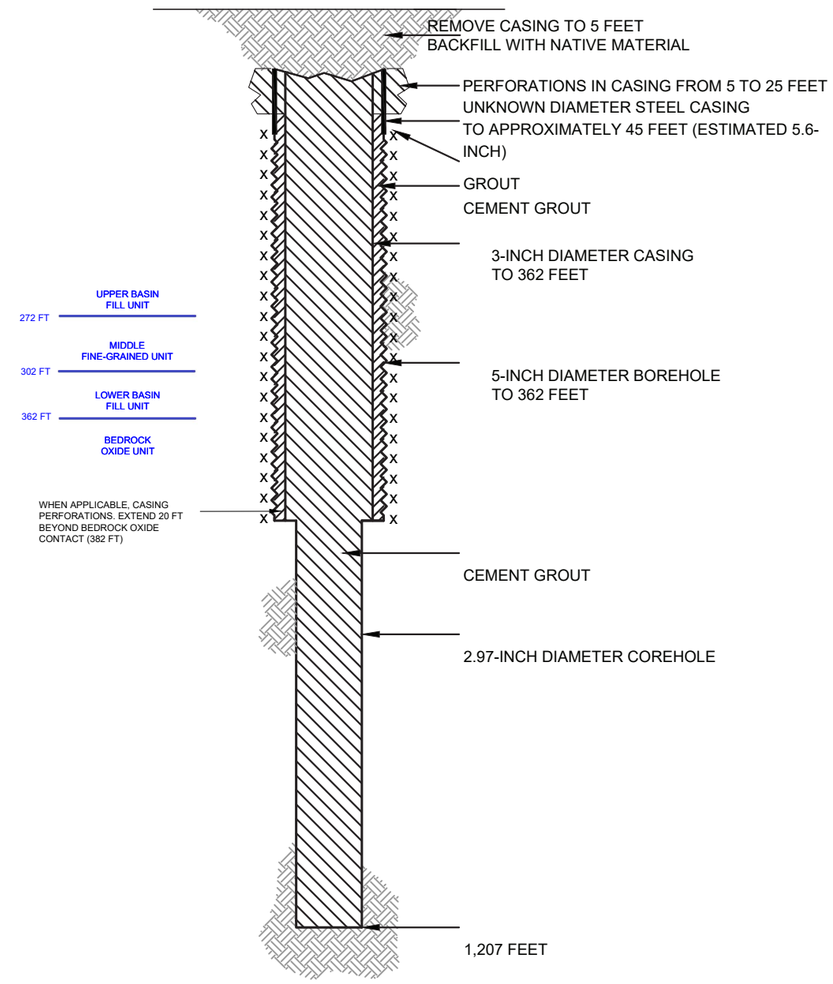
AS-BUILT COREHOLE MCC537



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC537



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC537 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC538

State	County
Arizona	Pinal

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

Latitude 33.04858769

Longitude -111.4334531

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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Dan Johnson, VP - General Manager		10/3/2019

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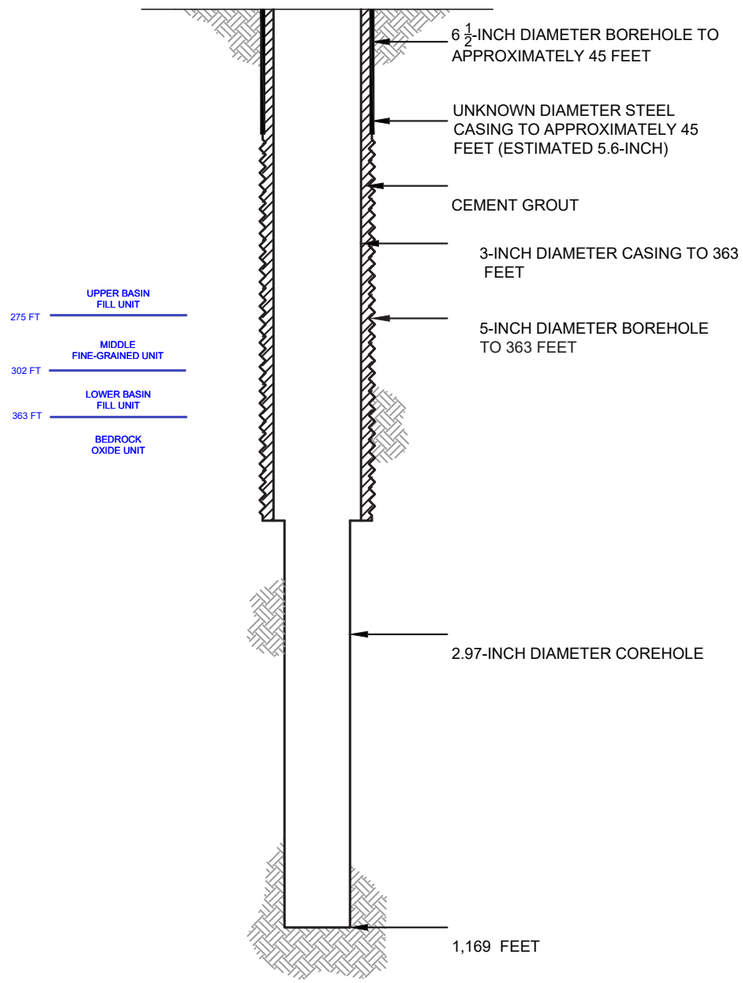
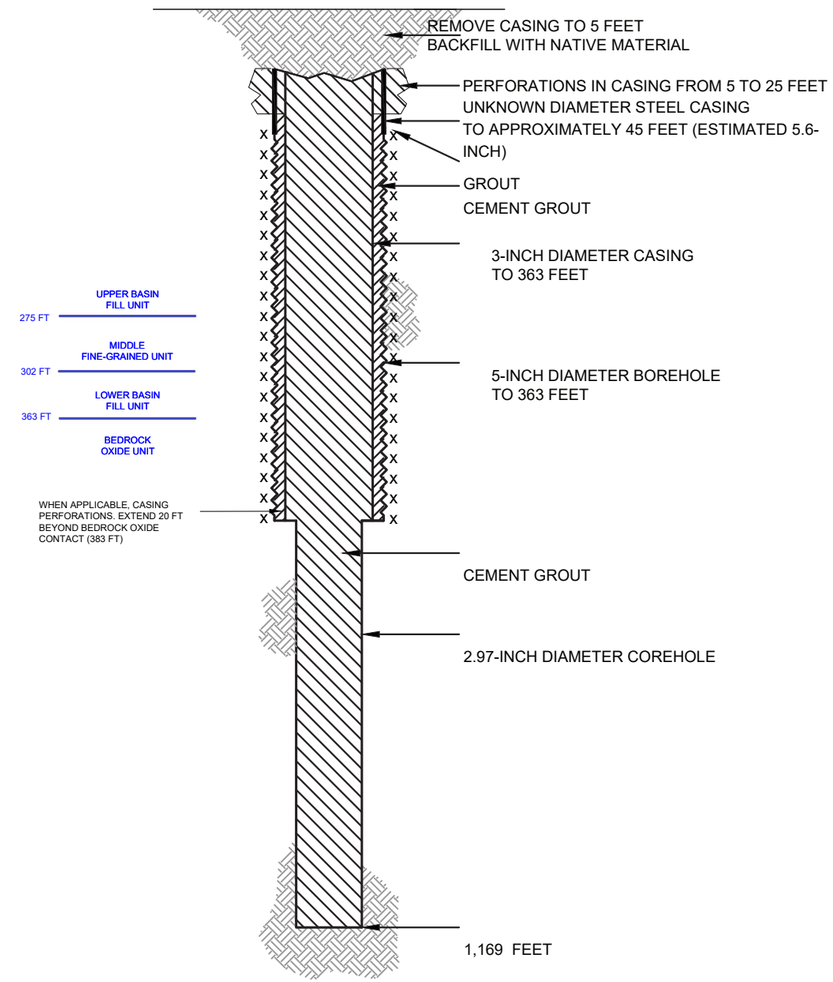
AS-BUILT COREHOLE MCC538



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC538



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC538 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC540

State	County
Arizona	Pinal

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

Latitude 33.04746014

Longitude -111.433082047

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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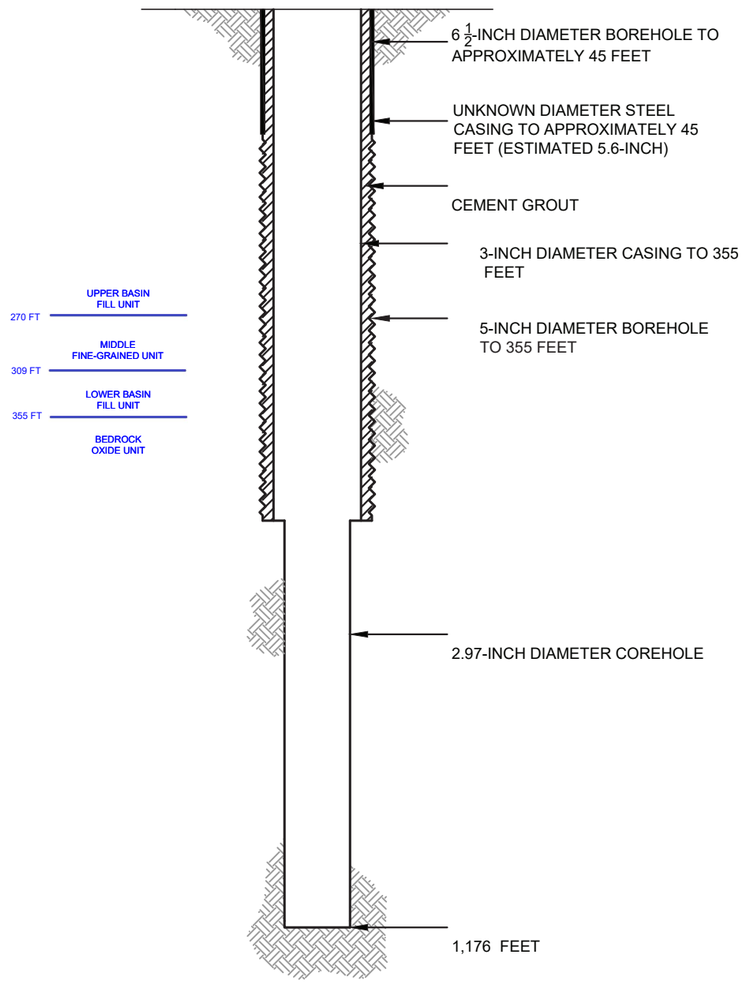
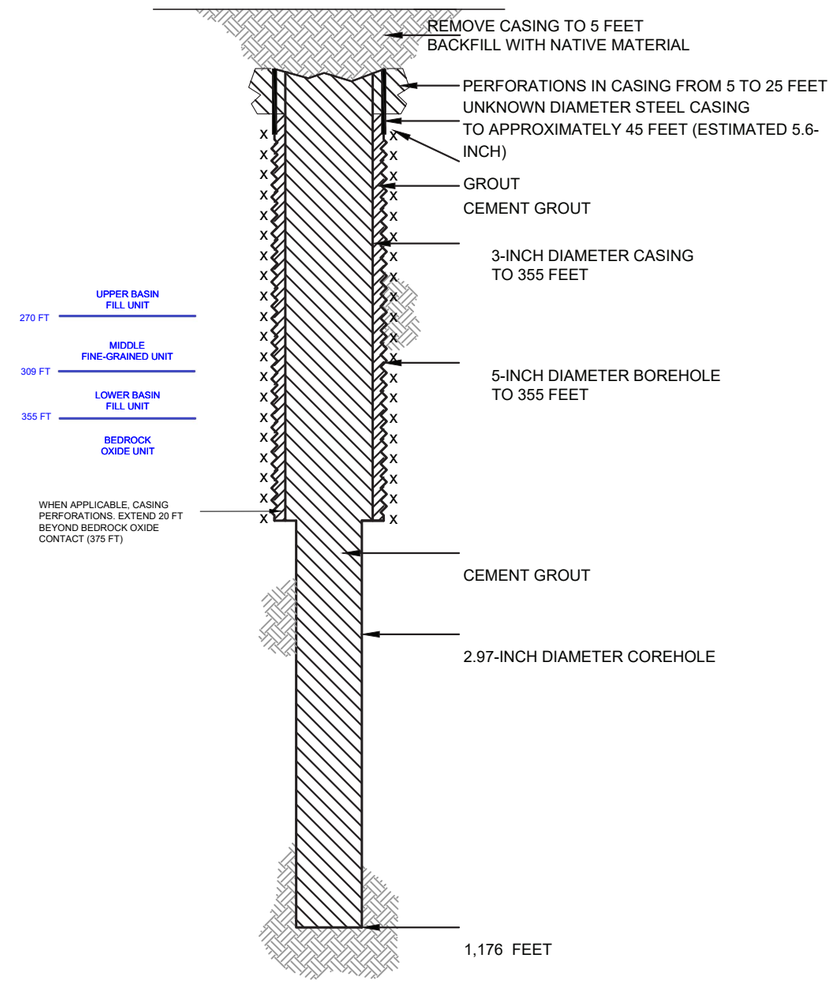
AS-BUILT COREHOLE MCC540



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC540



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC540 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC541

State	County
Arizona	Pinal

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

Latitude 33.04562075

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4321555

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

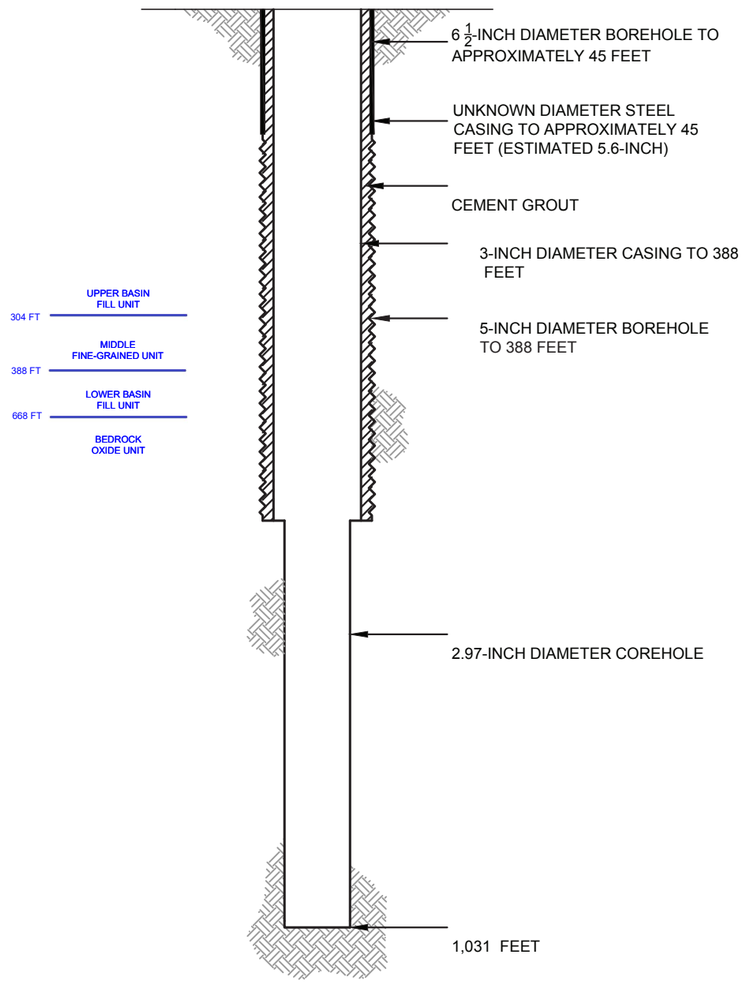
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

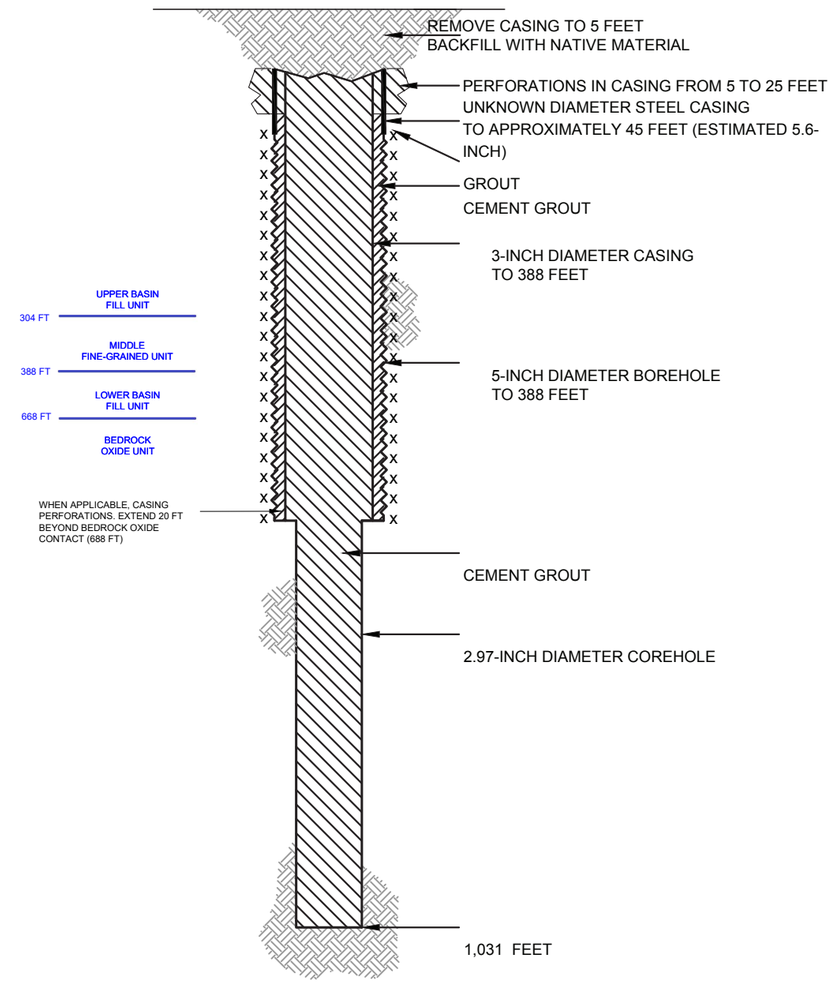
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE MCC541



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC541



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC541 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC542

State	County
Arizona	Pinal

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

Latitude 33.0528205

Surface Location

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

Longitude -111.4340792

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

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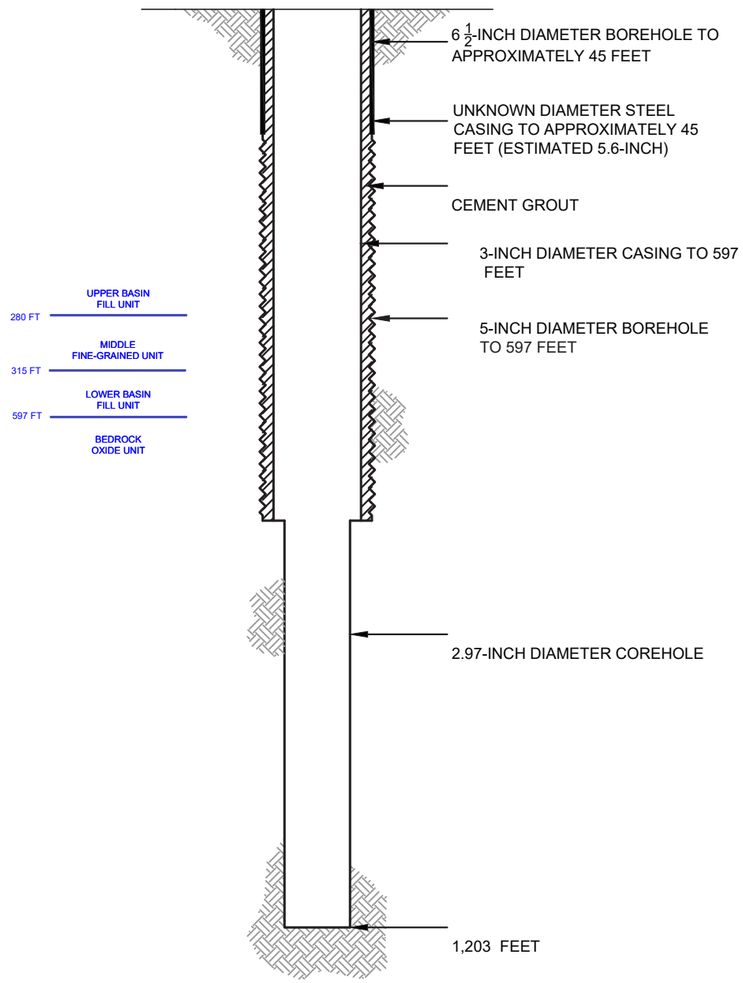
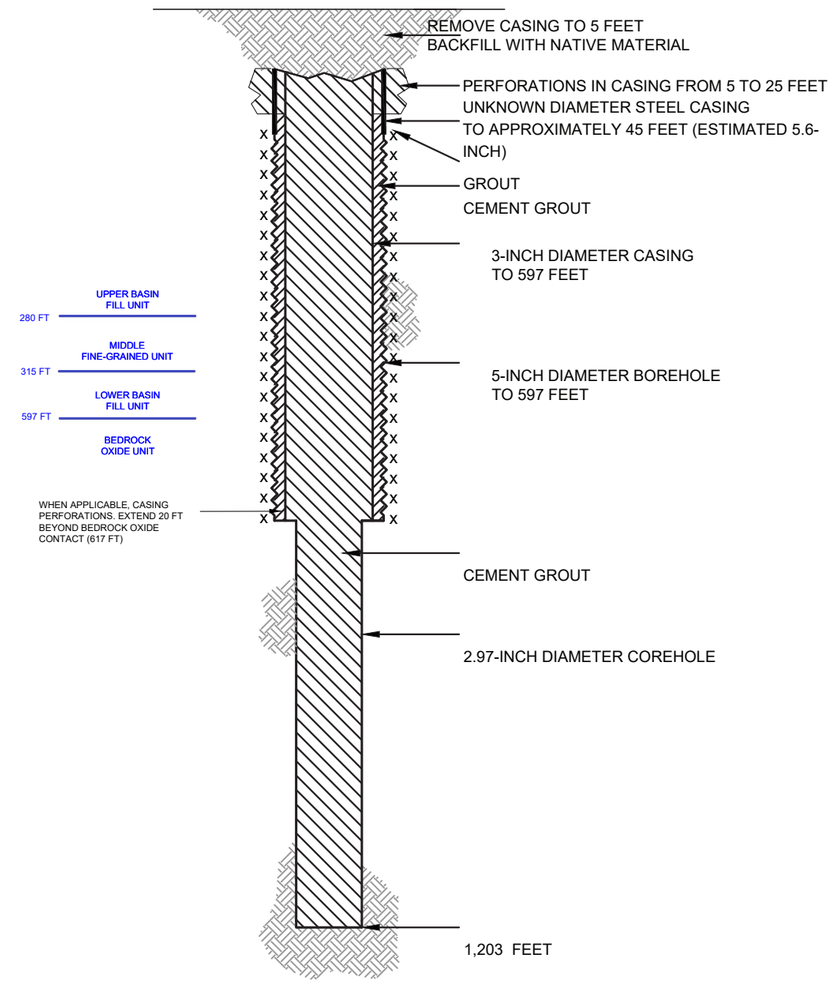
AS-BUILT COREHOLE MCC542



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC542



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC542 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC543

State	County
Arizona	Pinal

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

Latitude 33.05214511

Longitude -111.4346331

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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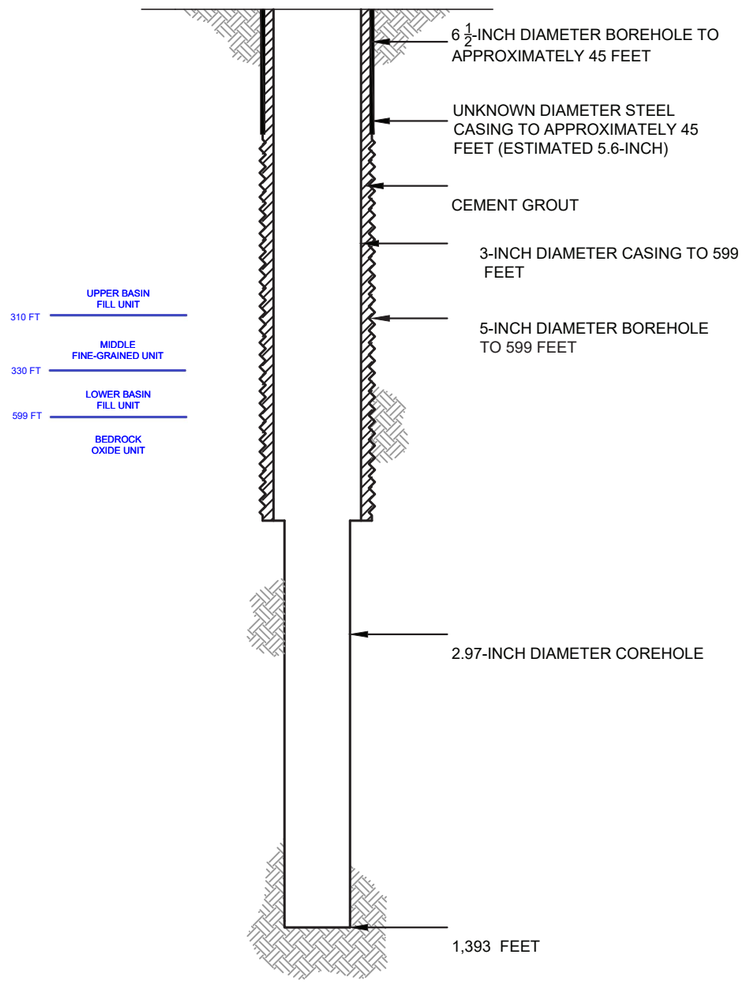
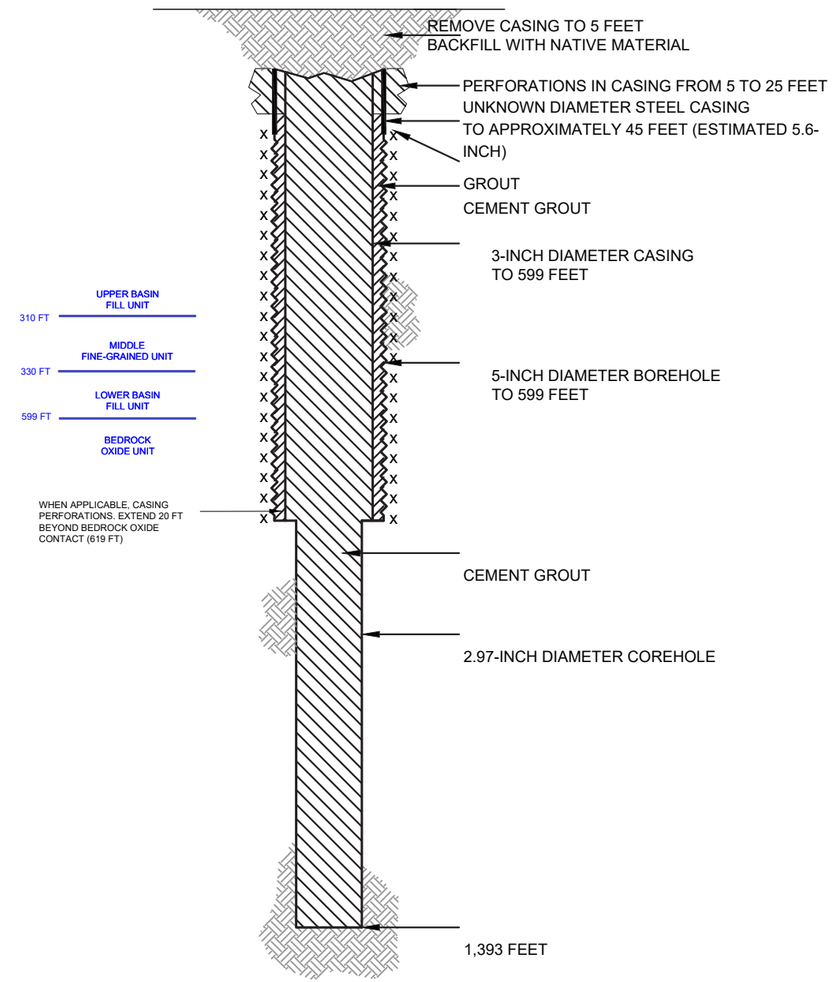
AS-BUILT COREHOLE MCC543



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC543



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC543 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC545

State	County
Arizona	Pinal

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

Latitude 33.05033545

Longitude -111.4347096

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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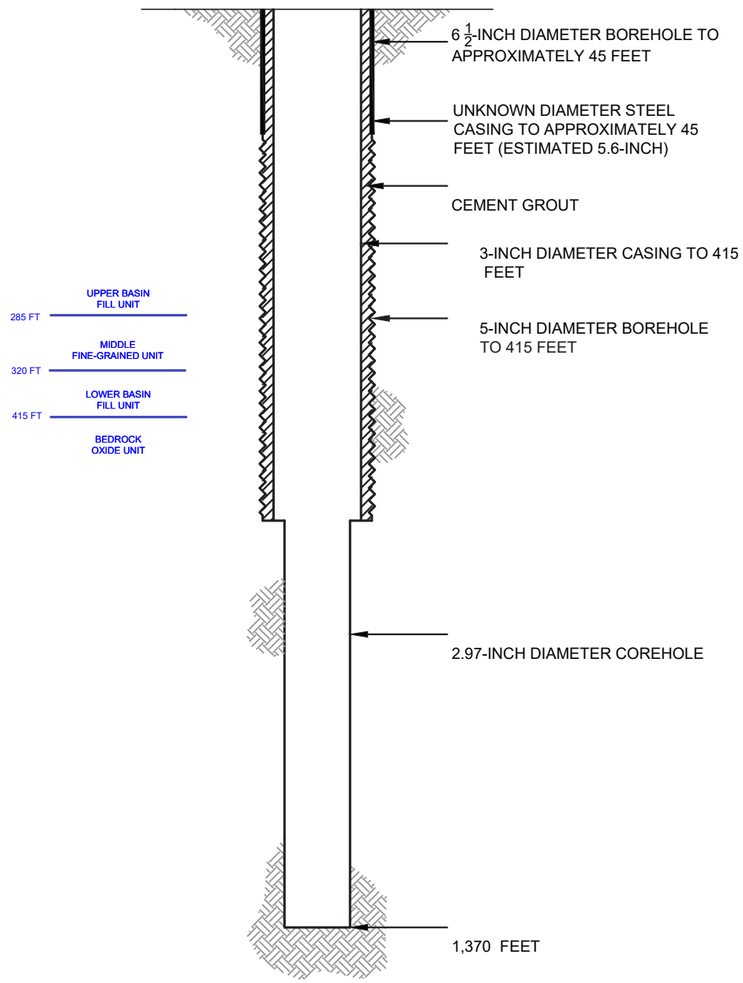
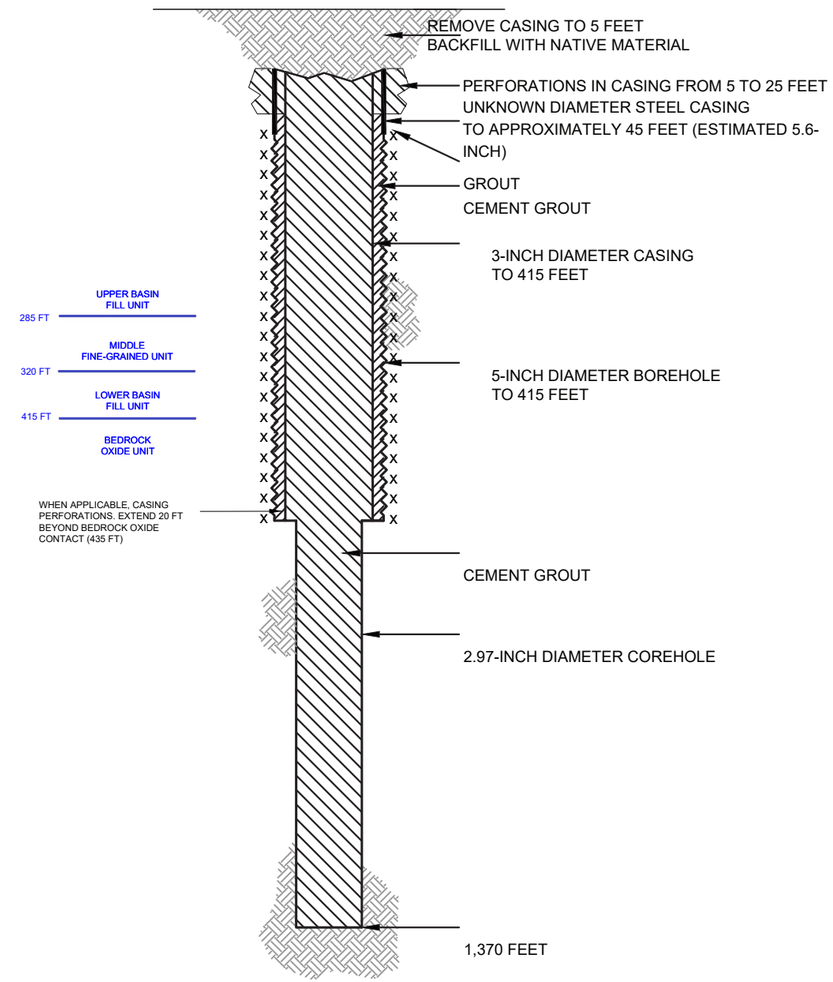
AS-BUILT COREHOLE MCC545



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC545



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC545 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC546

State	County
Arizona	Pinal

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

Latitude 33.05154617

Longitude -111.4342007

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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

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Name and Official Title *(Please type or print)*	Signature	Date Signed
Dan Johnson, VP - General Manager		10/3/2019

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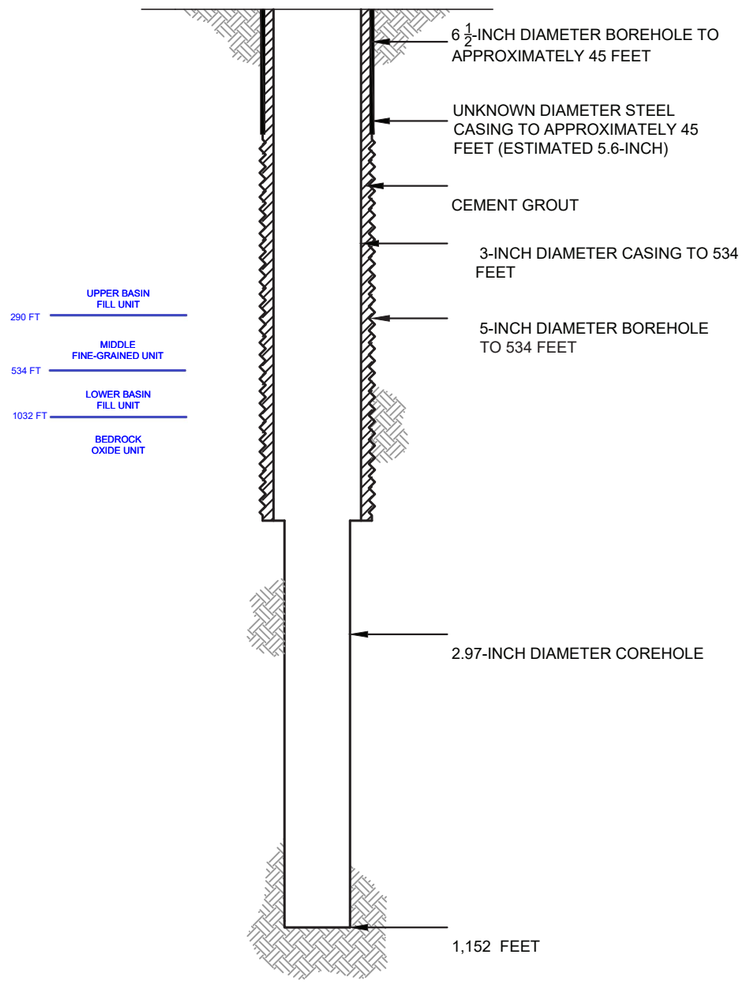
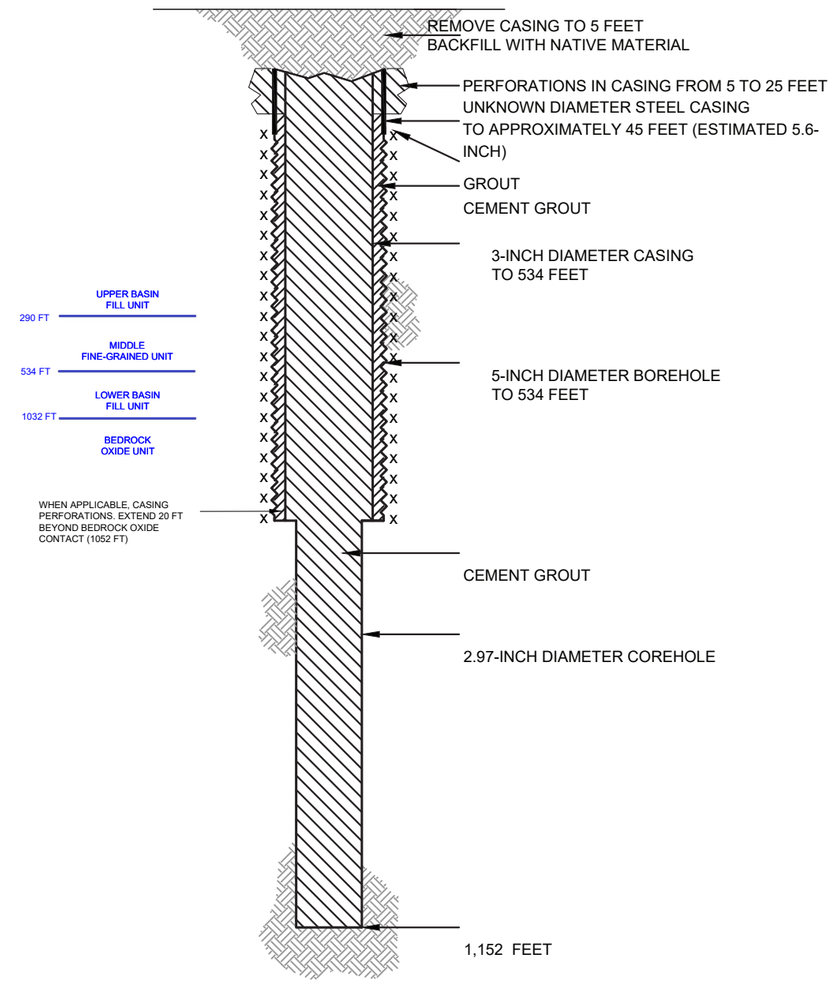
AS-BUILT COREHOLE MCC546



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC546



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC546 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC546A

State	County
Arizona	Pinal

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

Latitude 33.05156859

Longitude -111.4341696

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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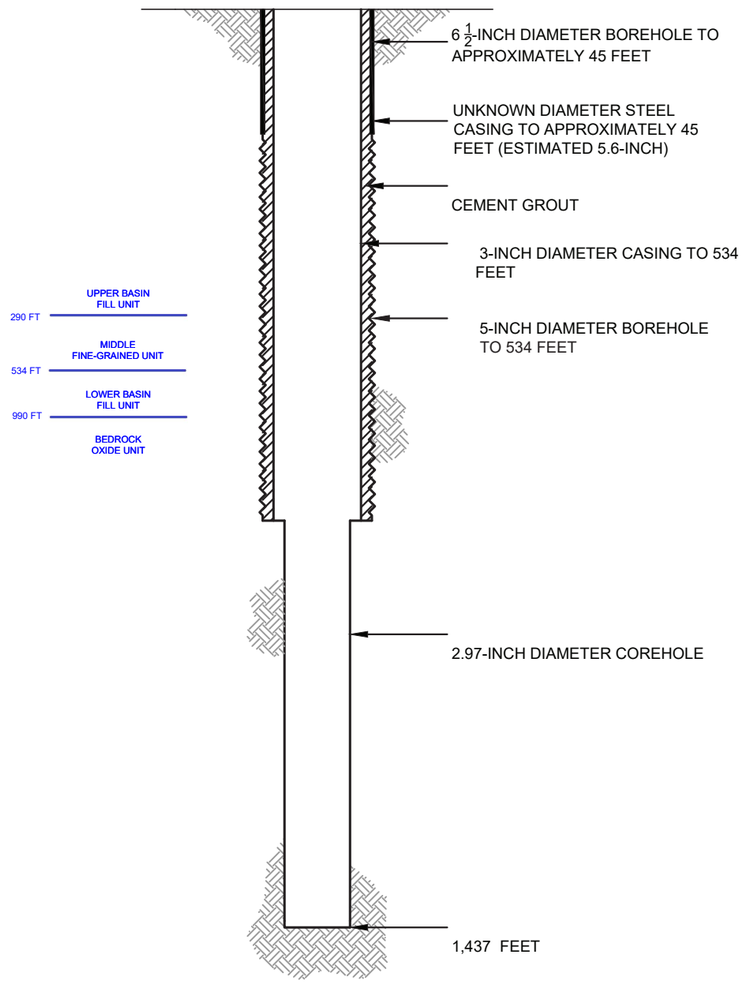
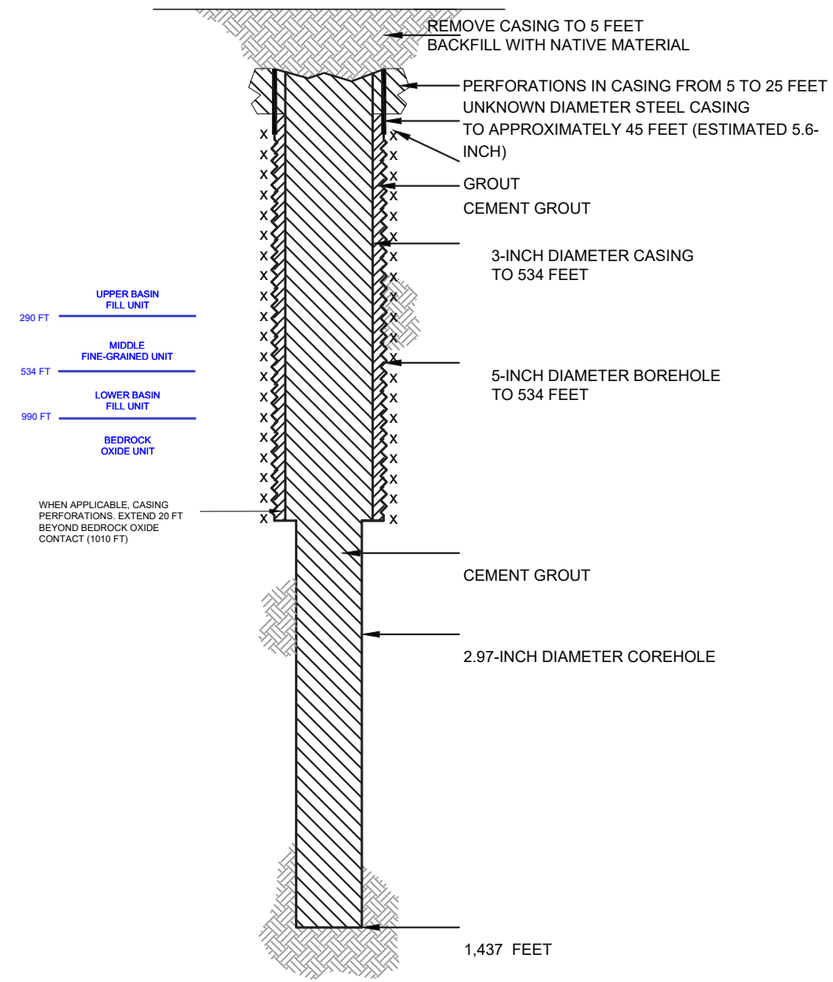
AS-BUILT COREHOLE MCC546A



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC546A



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC546A DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC549

State	County
Arizona	Pinal

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

Latitude 33.04824141

Longitude -111.4328262

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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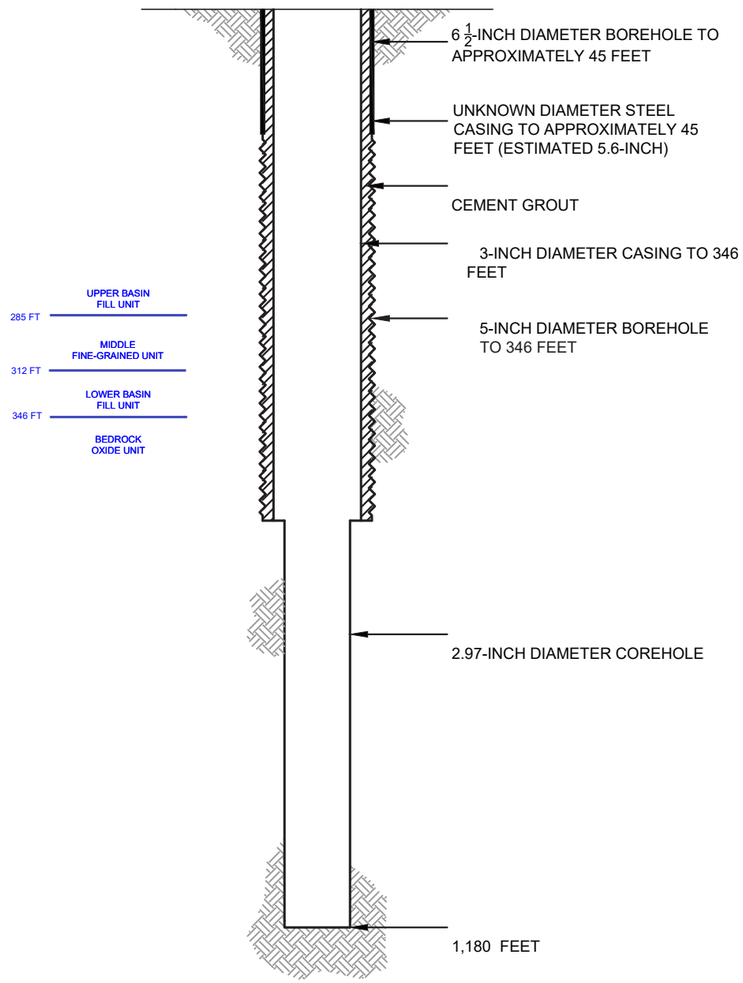
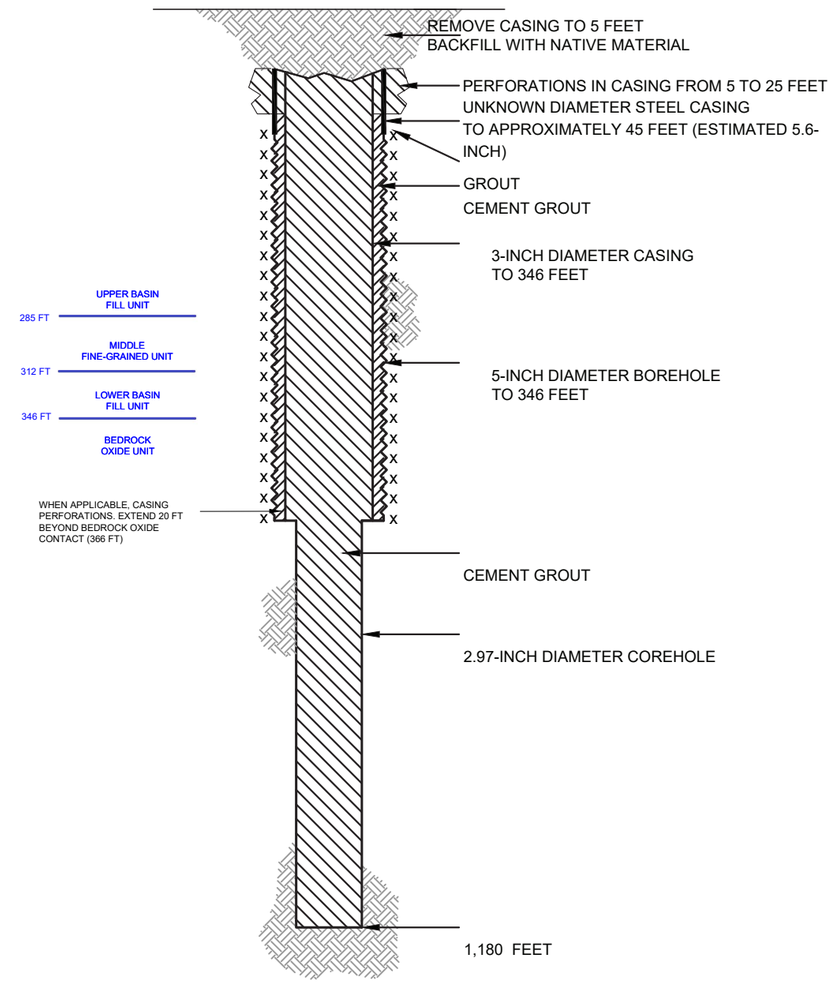
AS-BUILT COREHOLE MCC549



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC549



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC549 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC550

State	County
Arizona	Pinal

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

Latitude 33.04687996

Surface Location

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

Longitude -111.4335206

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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Dan Johnson, VP - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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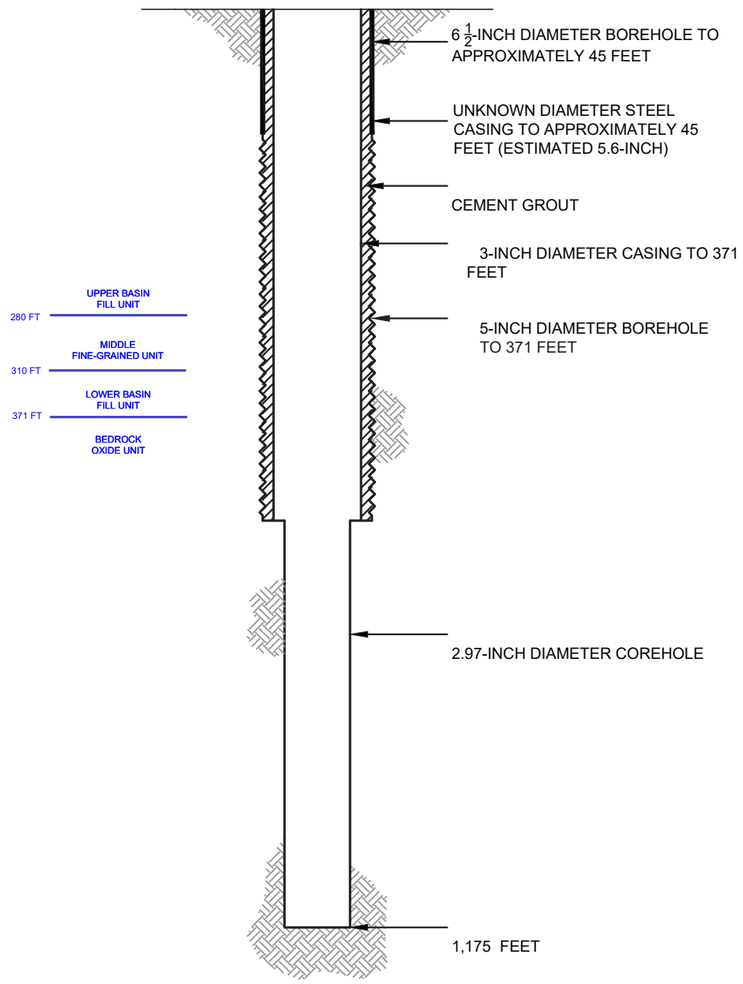
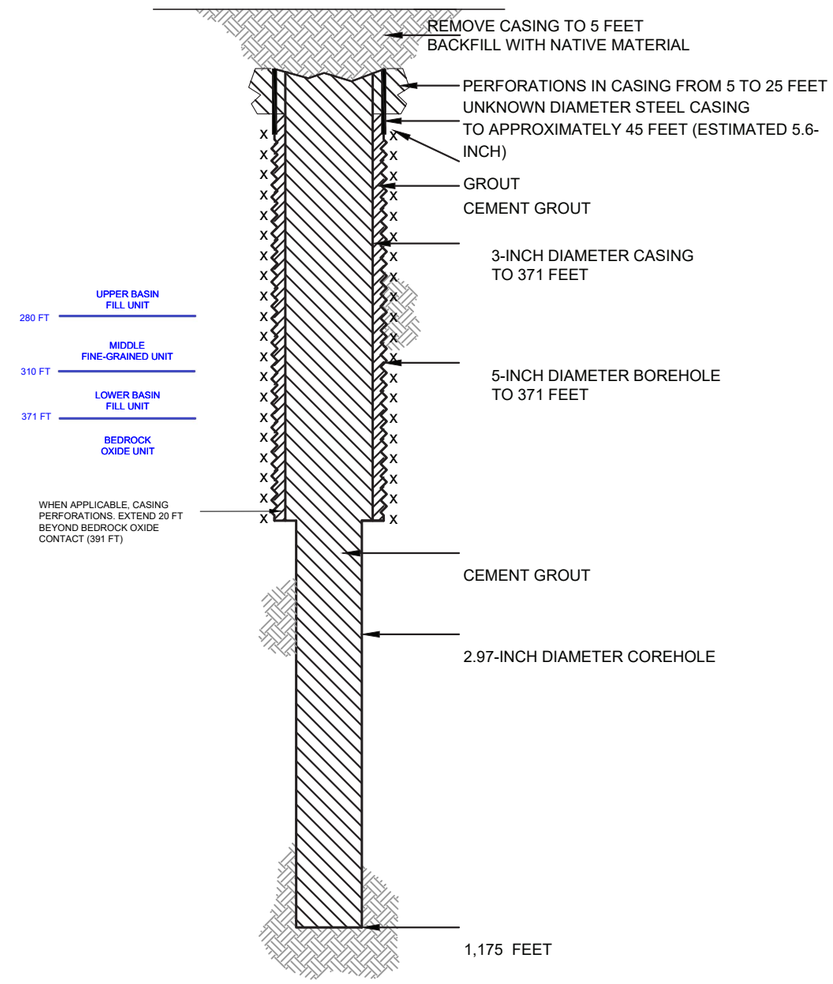
AS-BUILT COREHOLE MCC550



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC550



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC550 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC551

State	County
Arizona	Pinal

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

Latitude 33.04683722

Surface Location

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

Longitude -111.4327046

_____ **ft. from (N/S)** _____ **Line of quarter section**

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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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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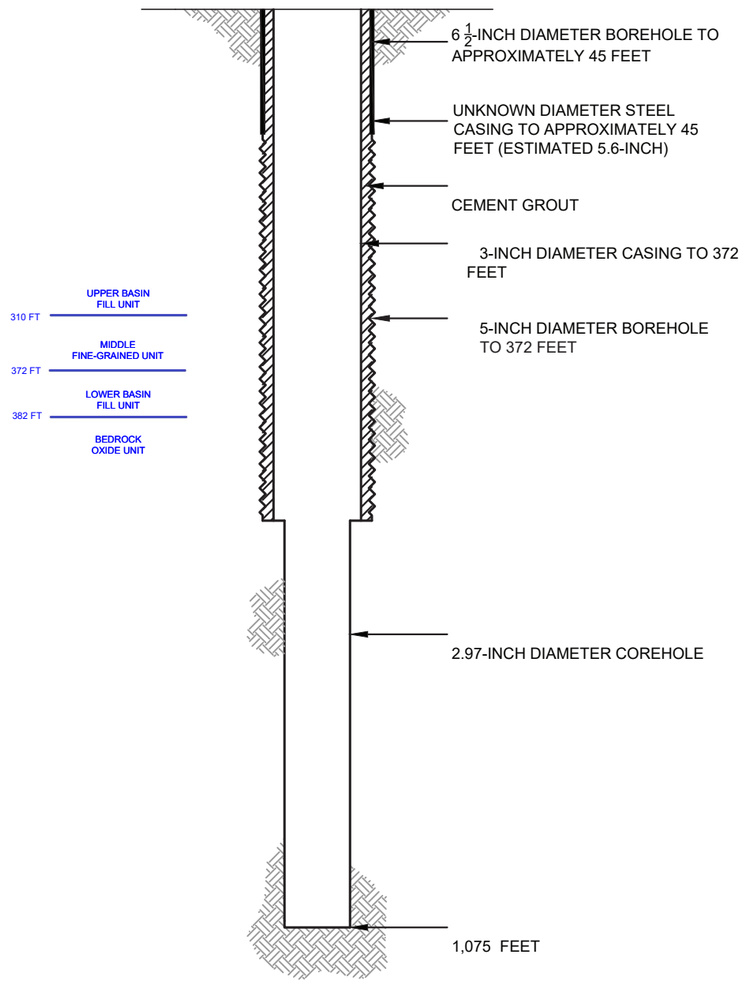
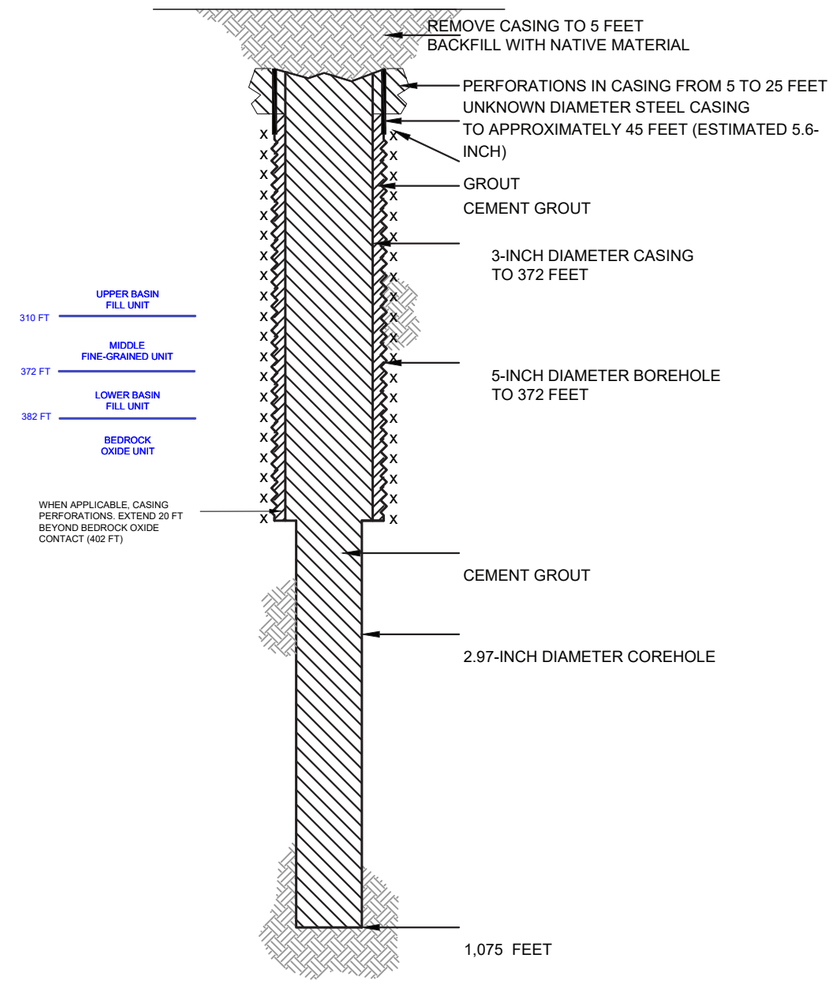
AS-BUILT COREHOLE MCC551



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC551



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC551 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC552

State	County
Arizona	Pinal

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

Latitude 33.04573676

Longitude -111.4337207

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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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 - General Manager		10/3/2019

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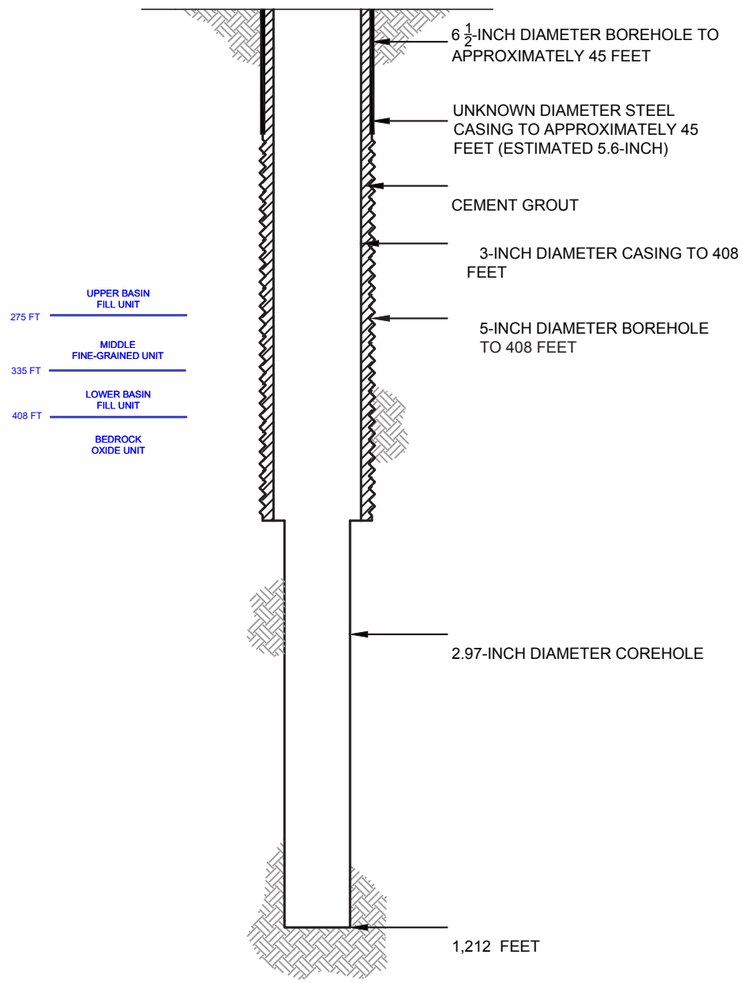
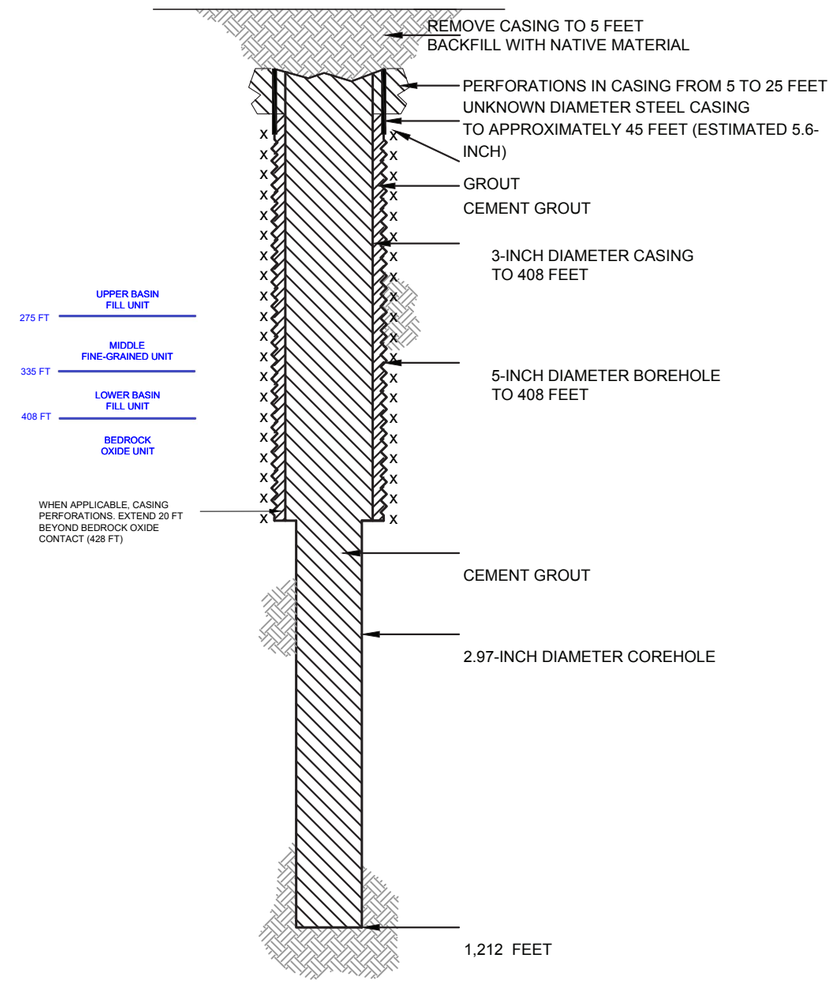
AS-BUILT COREHOLE MCC552



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC552



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC552 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC553

State	County
Arizona	Pinal

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

Latitude 33.04629685

Surface Location

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

Longitude -111.4339842

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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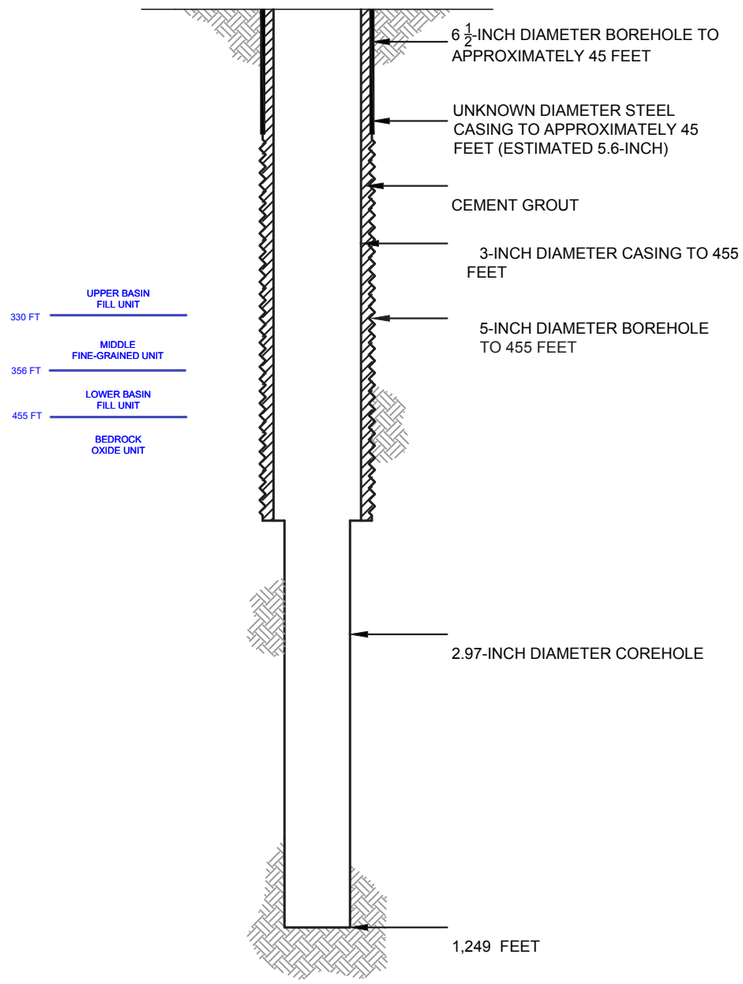
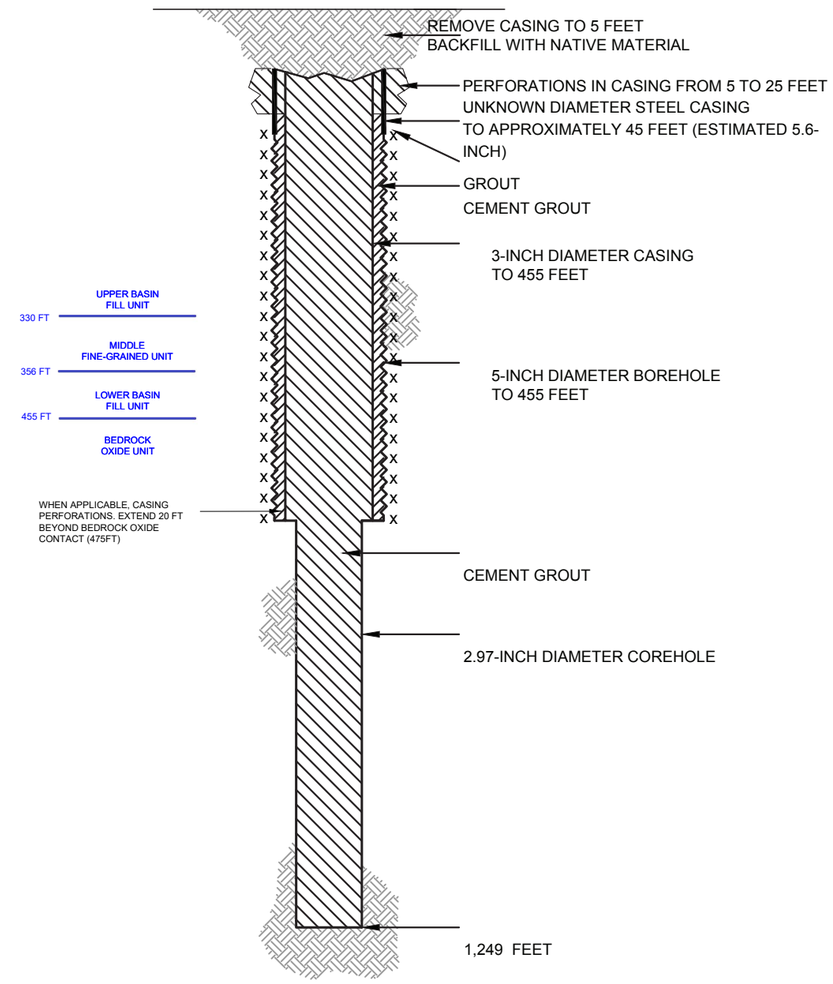


PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC553



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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC553 DIAGRAM

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NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

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R9UIC-AZ3-FY11-1		MCC554

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

Latitude 33.0455937

Surface Location

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Longitude -111.4313496

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_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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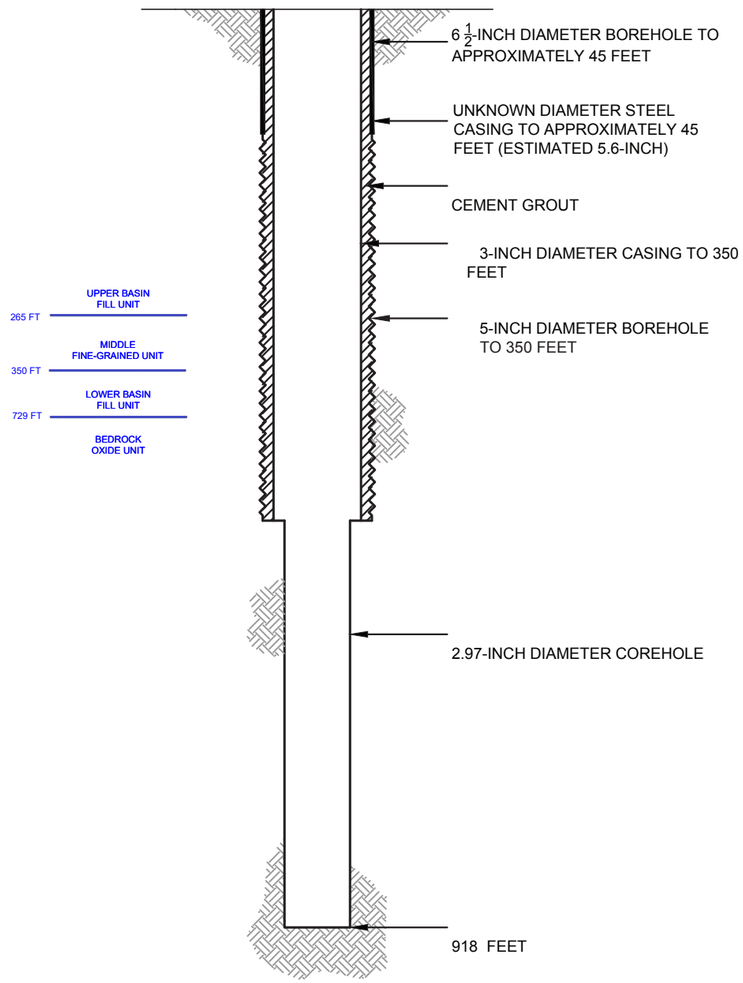
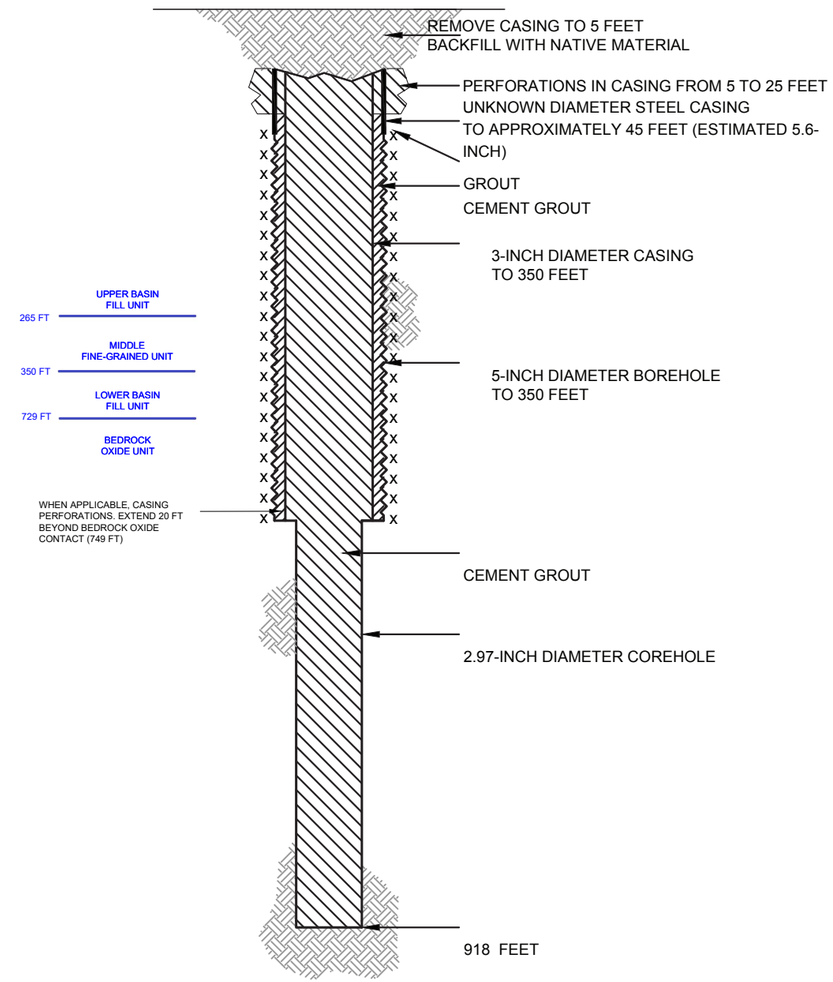
AS-BUILT COREHOLE MCC554



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC554



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC554 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC555

State	County
Arizona	Pinal

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

Latitude 33.04679182

Longitude -111.4319144

Surface Location

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

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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Dan Johnson, VP - General Manager		10/3/2019

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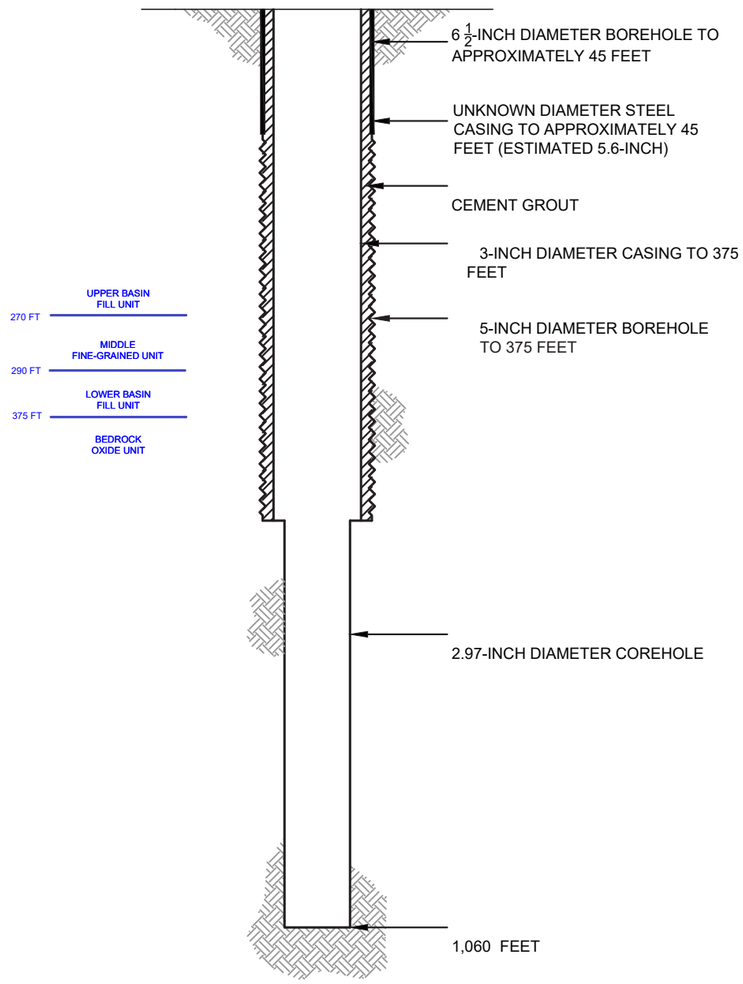
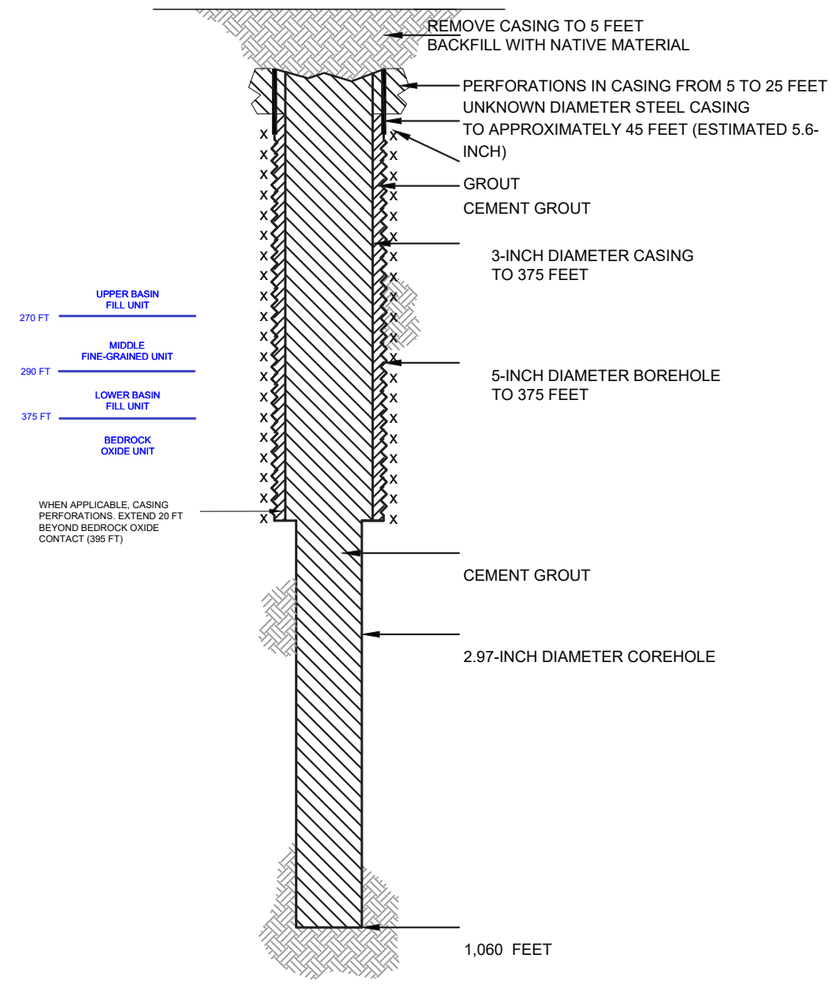
AS-BUILT COREHOLE MCC555



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC555



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC555 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC556

State	County
Arizona	Pinal

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

Latitude 33.0456953

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4329514

_____ **ft. from (N/S)** _____ **Line of quarter section**

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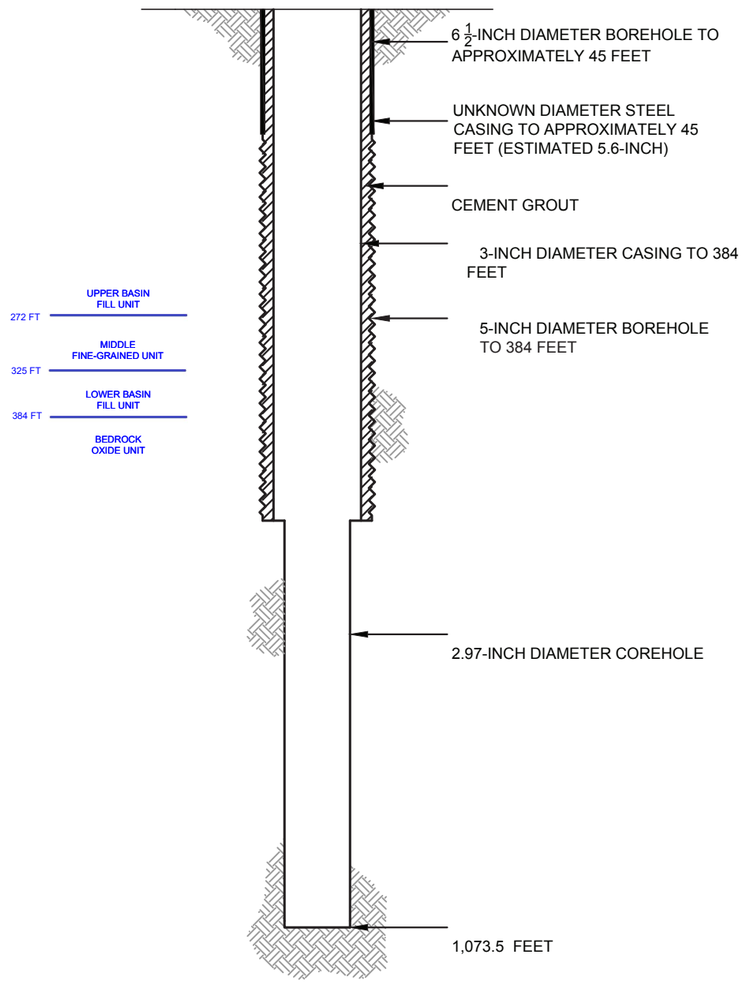
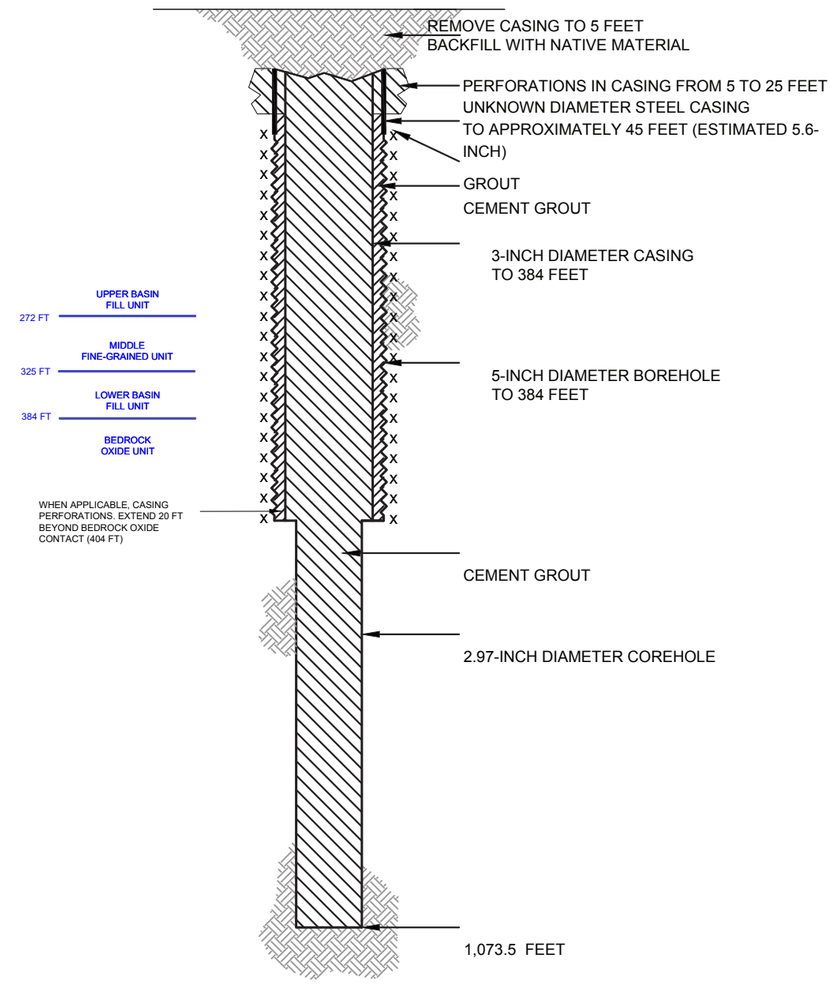


PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC556



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC556 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC557

State	County
Arizona	Pinal

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

Latitude 33.0451285

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4330837

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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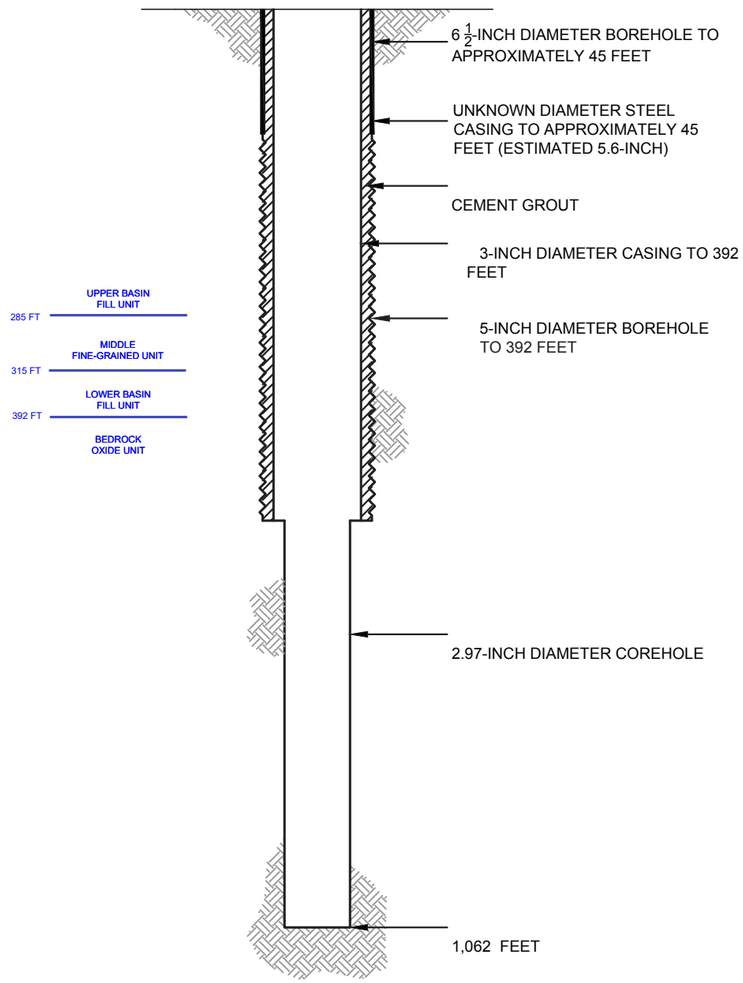
For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

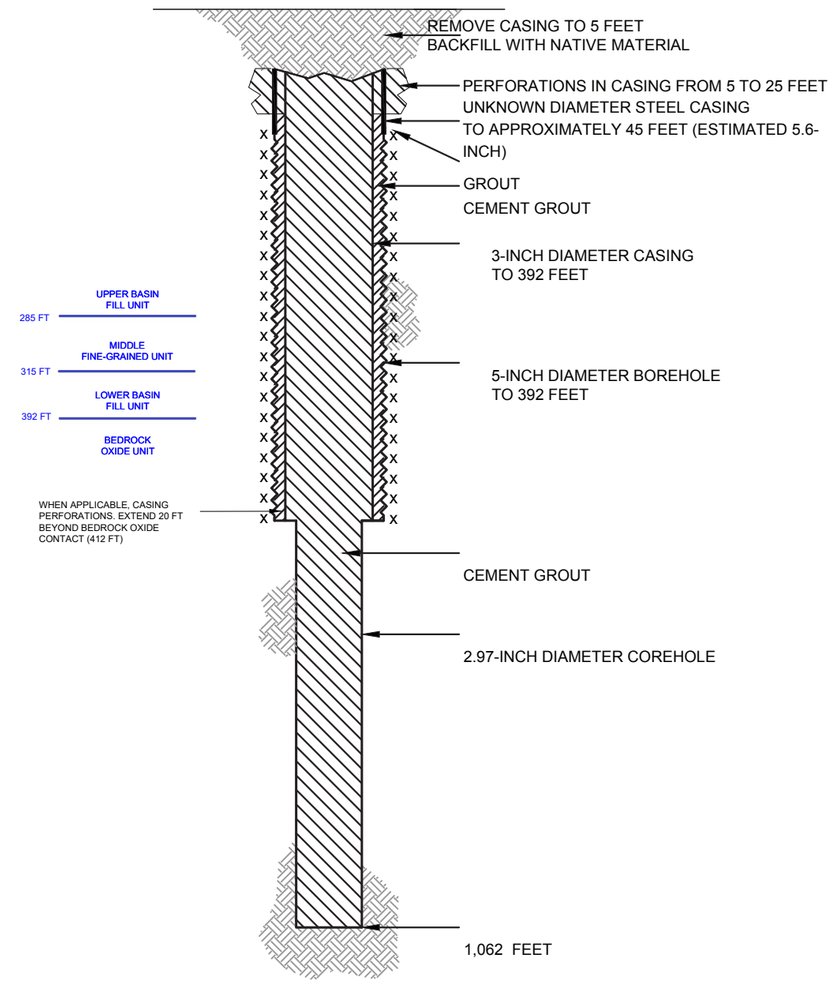
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE MCC557



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC557



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC557 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC558

State	County
Arizona	Pinal

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

Latitude 33.04508071

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.431465

_____ **ft. from (N/S)** _____ **Line of quarter section**

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Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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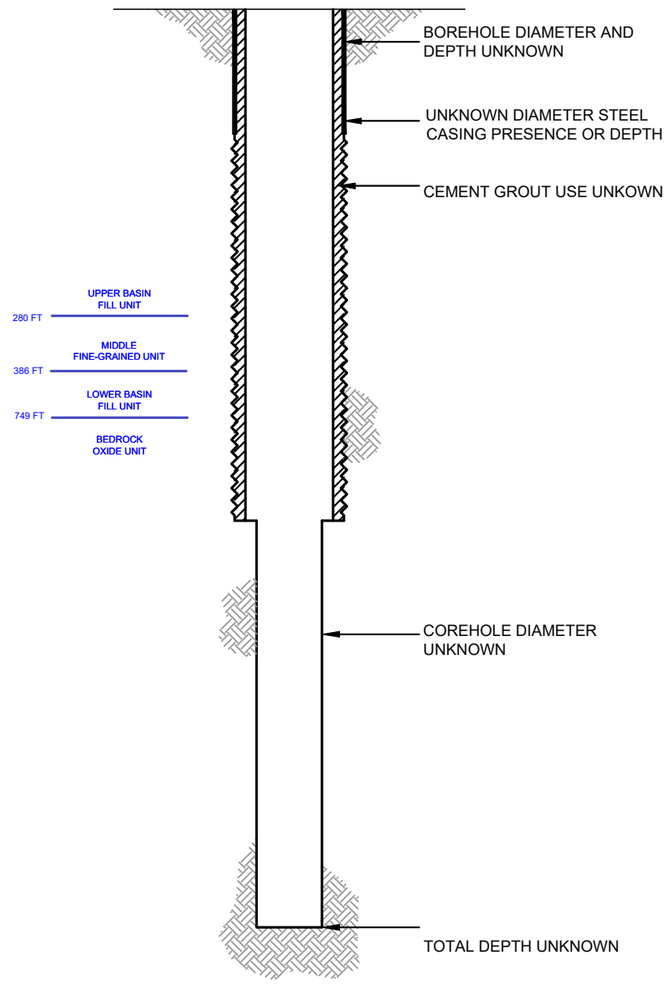

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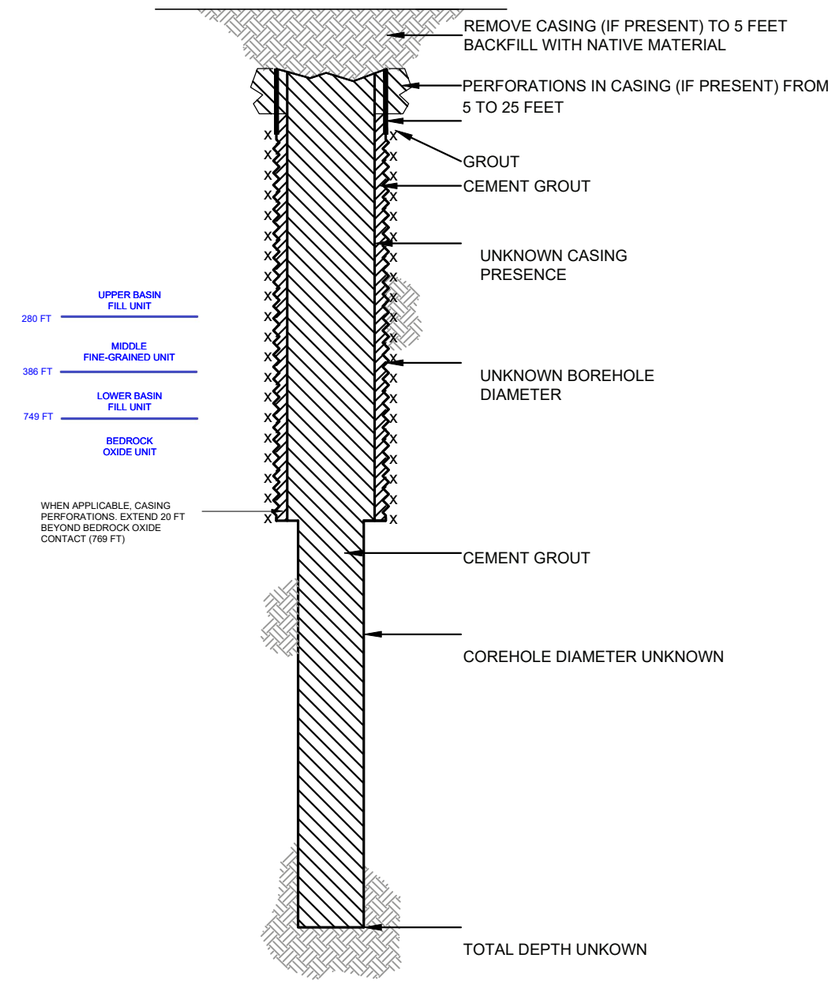

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FIGURE 1

MOBINI, GITA
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL\ABANDON\415S_ABANDON.DWG
Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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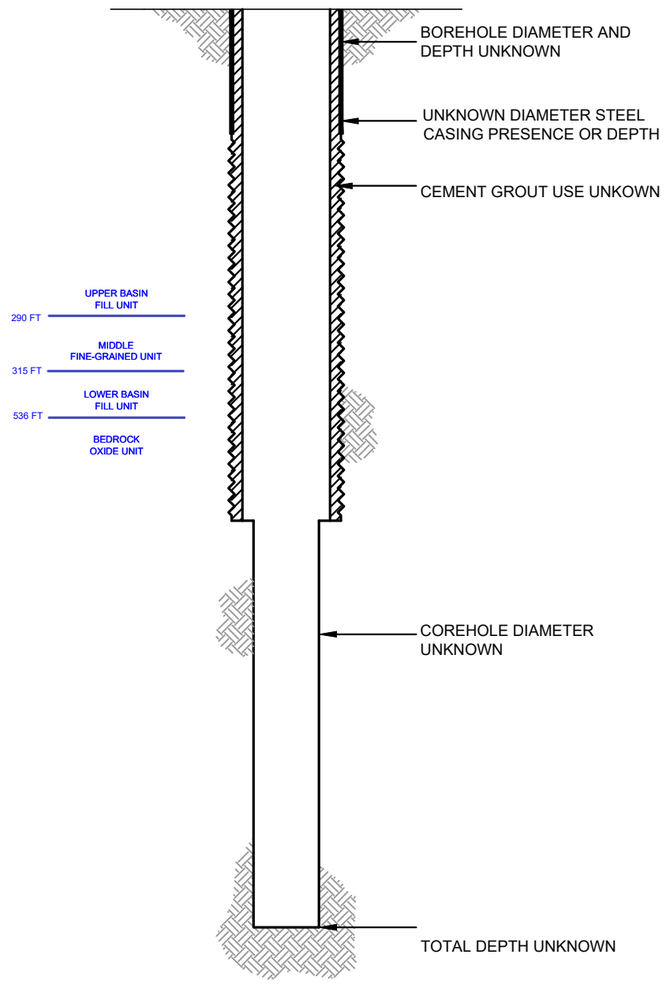
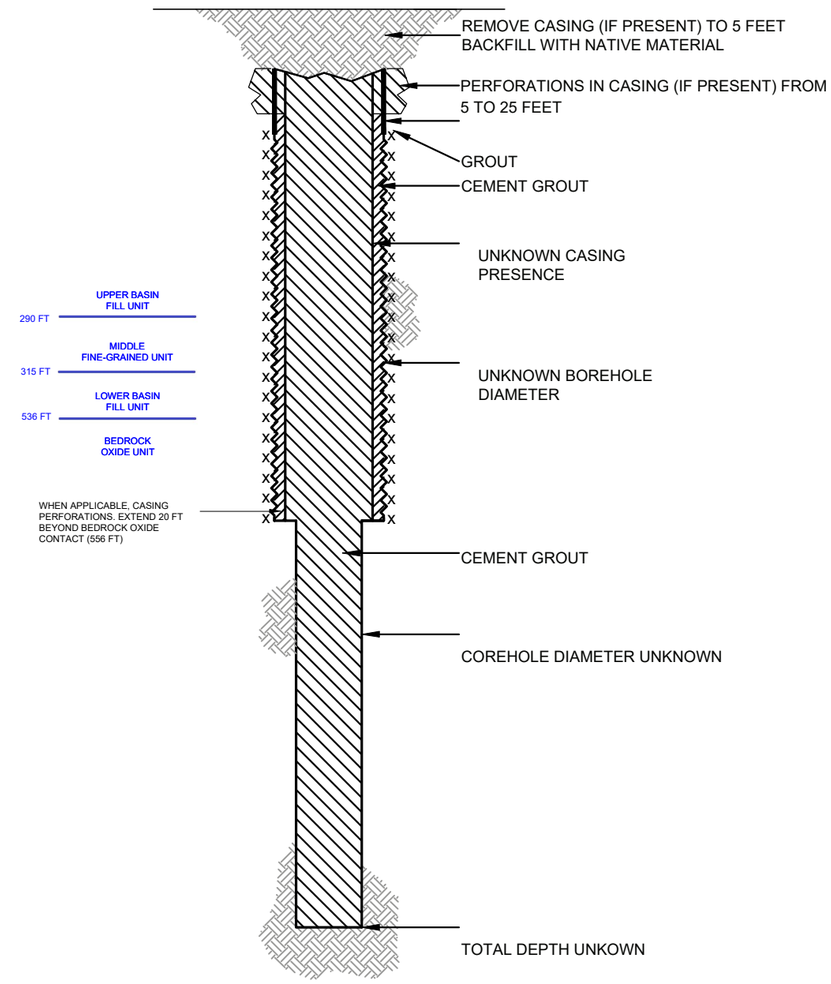
AS-BUILT COREHOLE MCC559



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC559



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC559 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA
G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG
Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC560

State	County
Arizona	Pinal

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

Latitude 33.04447225

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4325472

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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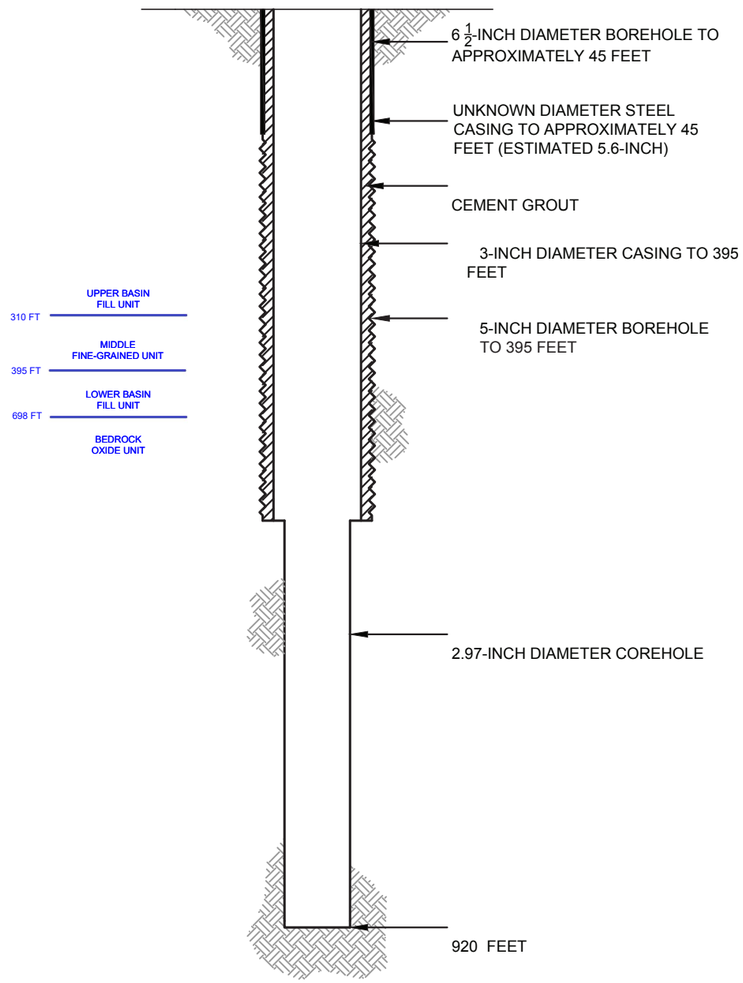
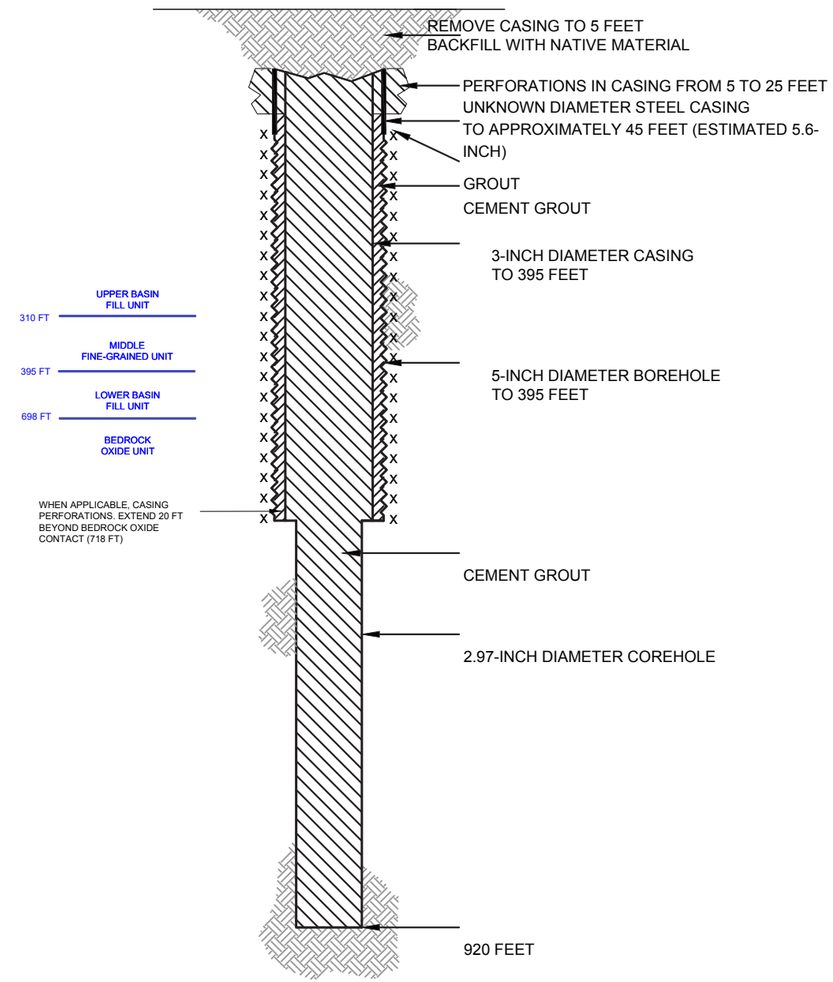
AS-BUILT COREHOLE MCC560



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC560



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC560 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC564

State	County
Arizona	Pinal

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

Latitude 33.04441533

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4318345

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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Dan Johnson, VP - General Manager		10/3/2019

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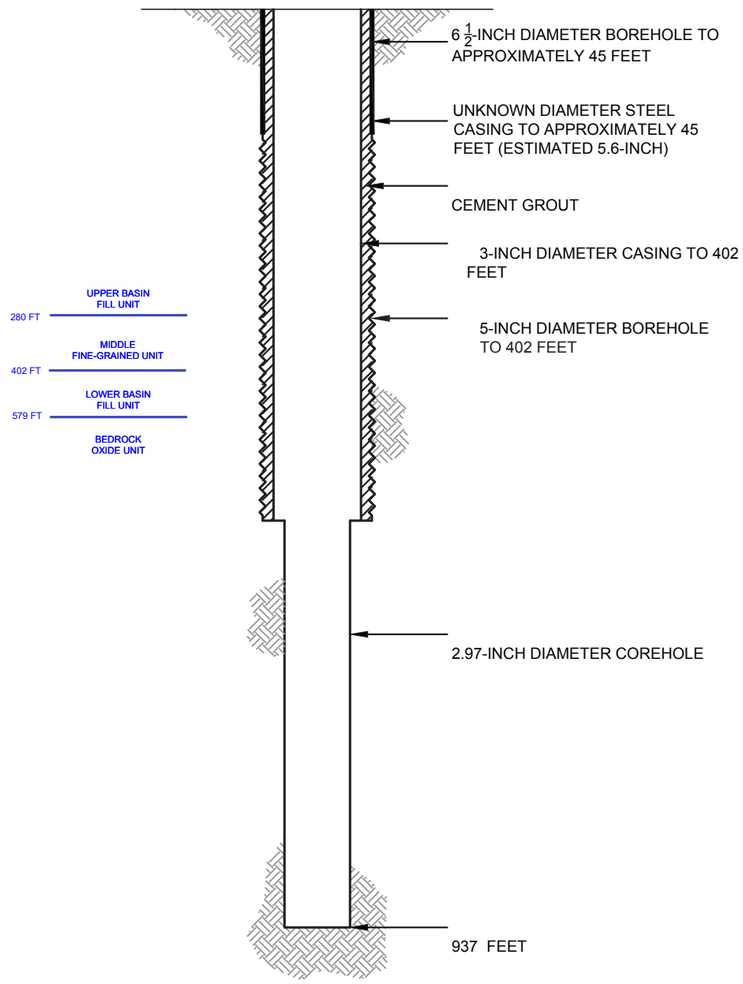
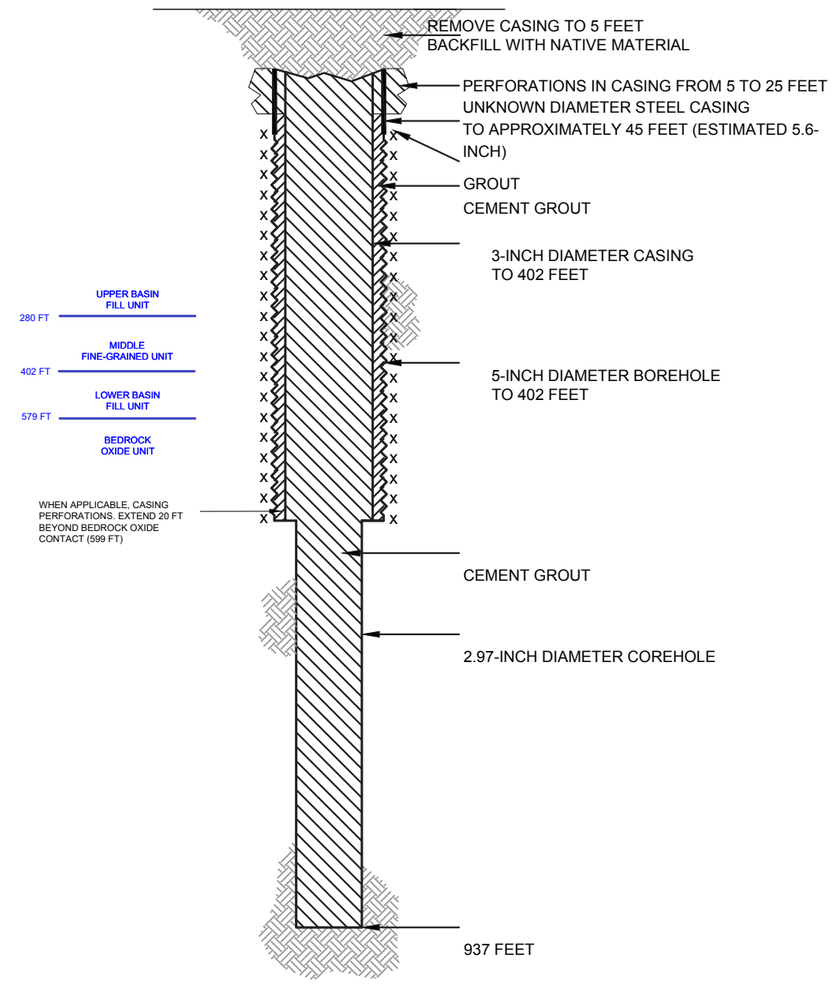
AS-BUILT COREHOLE MCC564



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC564



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC564 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPA\WELL ABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC565

State	County
Arizona	Pinal

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

Latitude 33.04558817

Longitude -111.4347449

Surface Location

NW **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

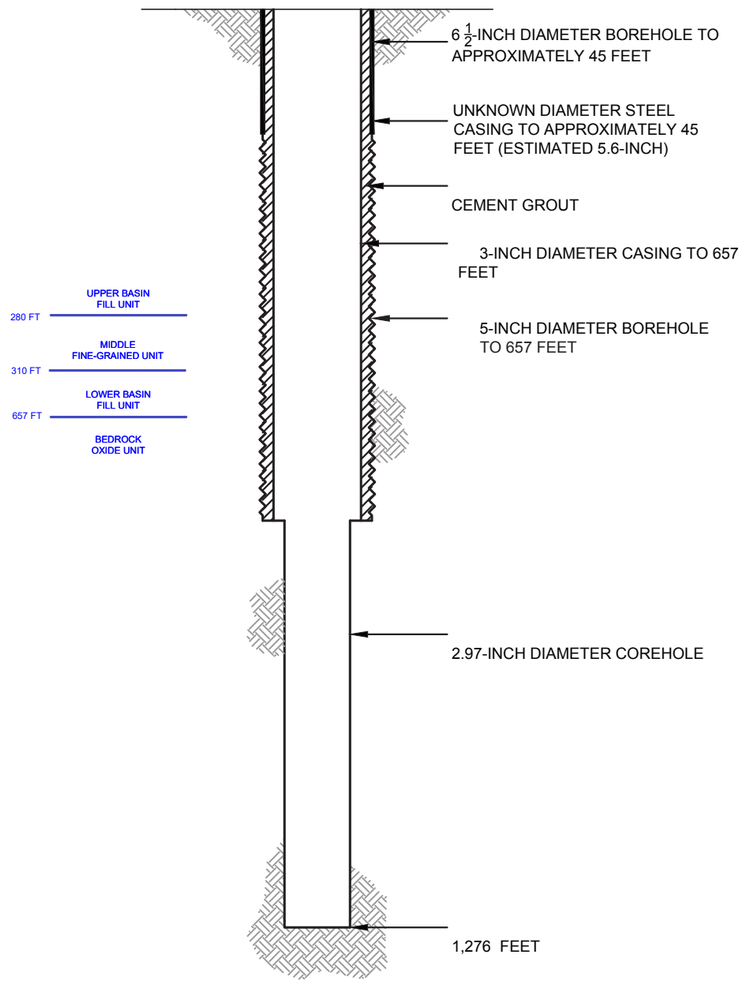
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

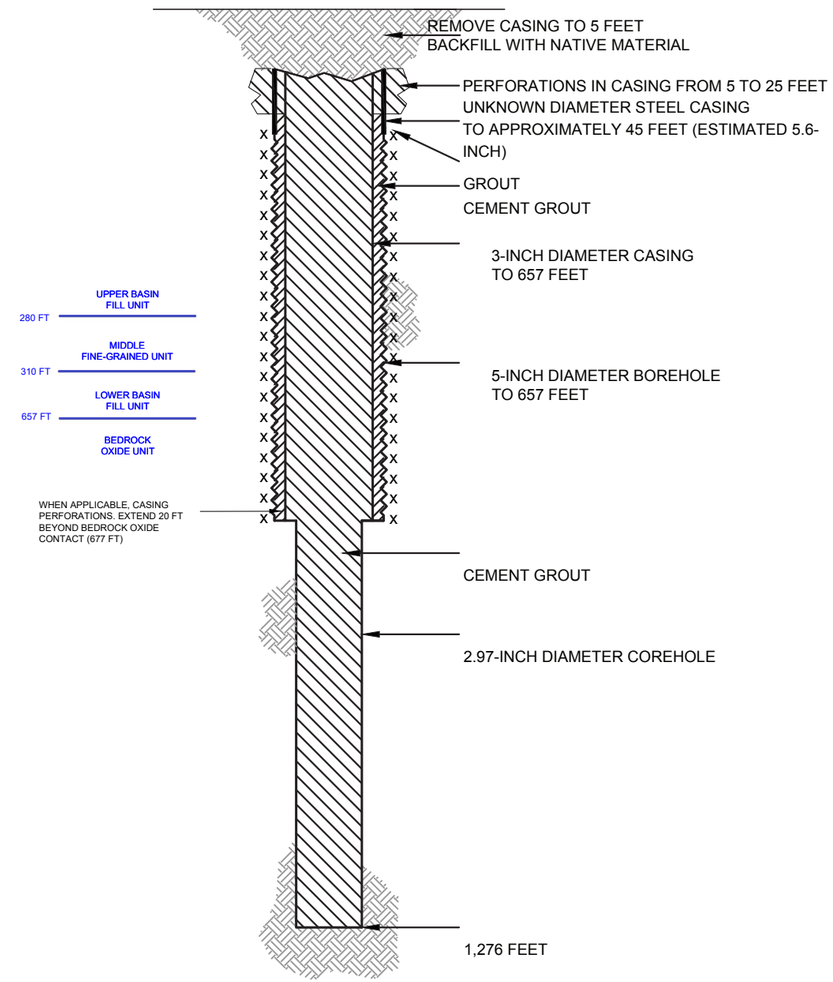
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE MCC565



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC565



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC565 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC566

State	County
Arizona	Pinal

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

Latitude 33.04441302

Surface Location

NE **1/4 of** NW **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4310281

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

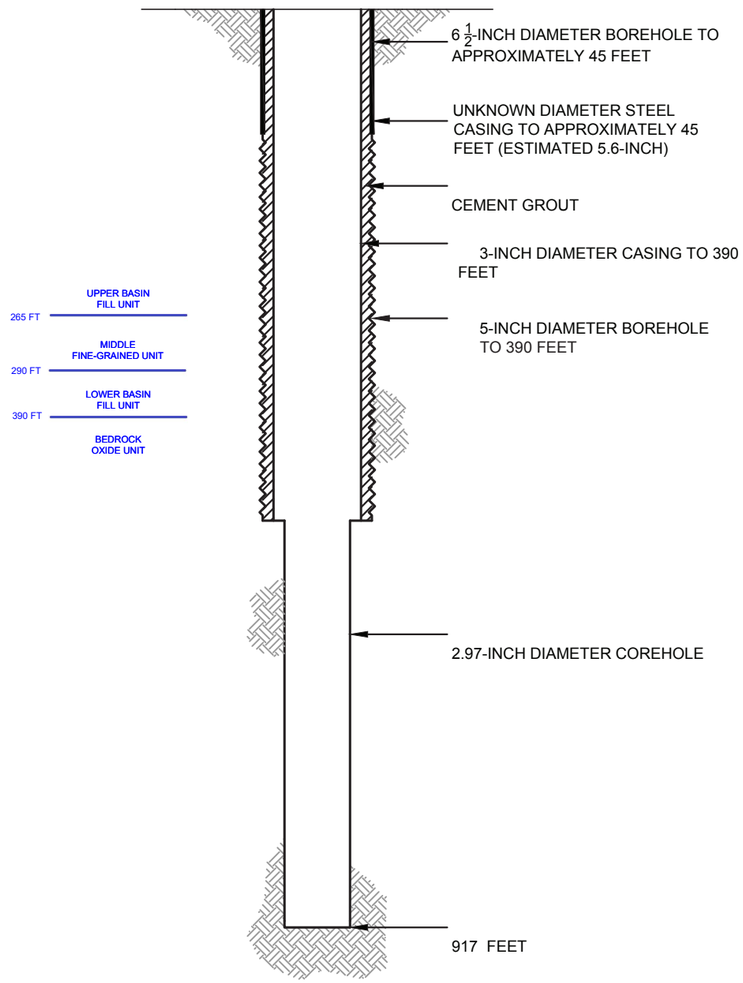
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

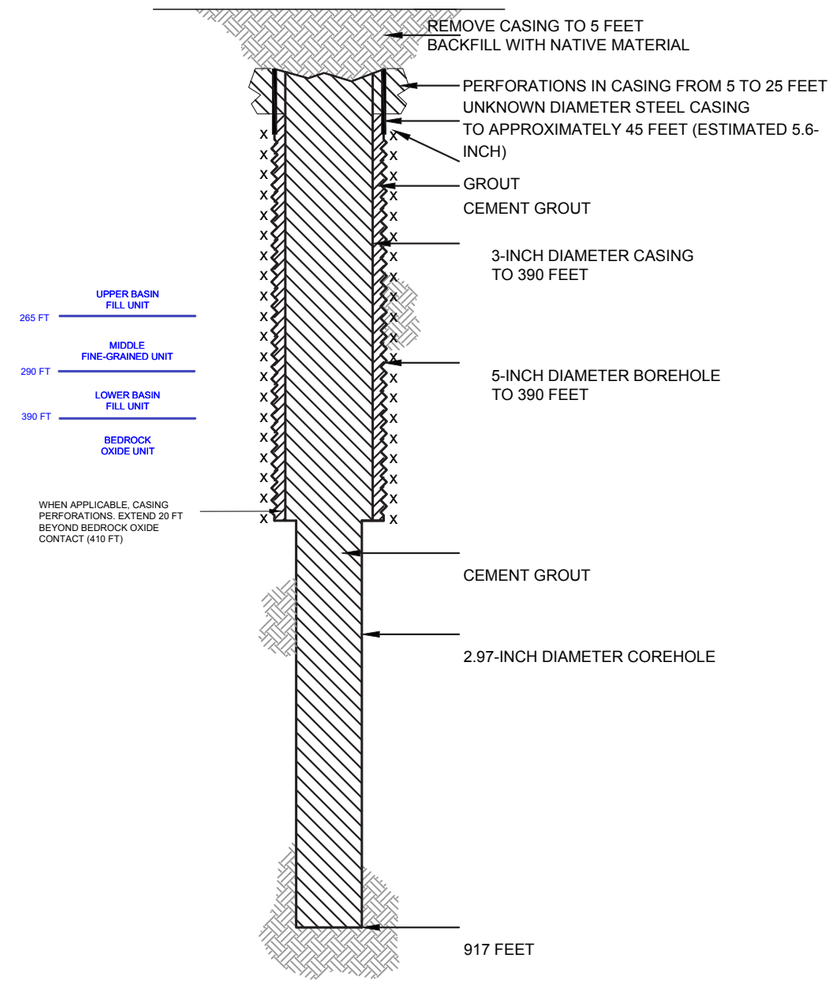
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE MCC566



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC566



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC566 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC567

State	County
Arizona	Pinal

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

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Latitude 33.04384373

Longitude -111.4322171

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.

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

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

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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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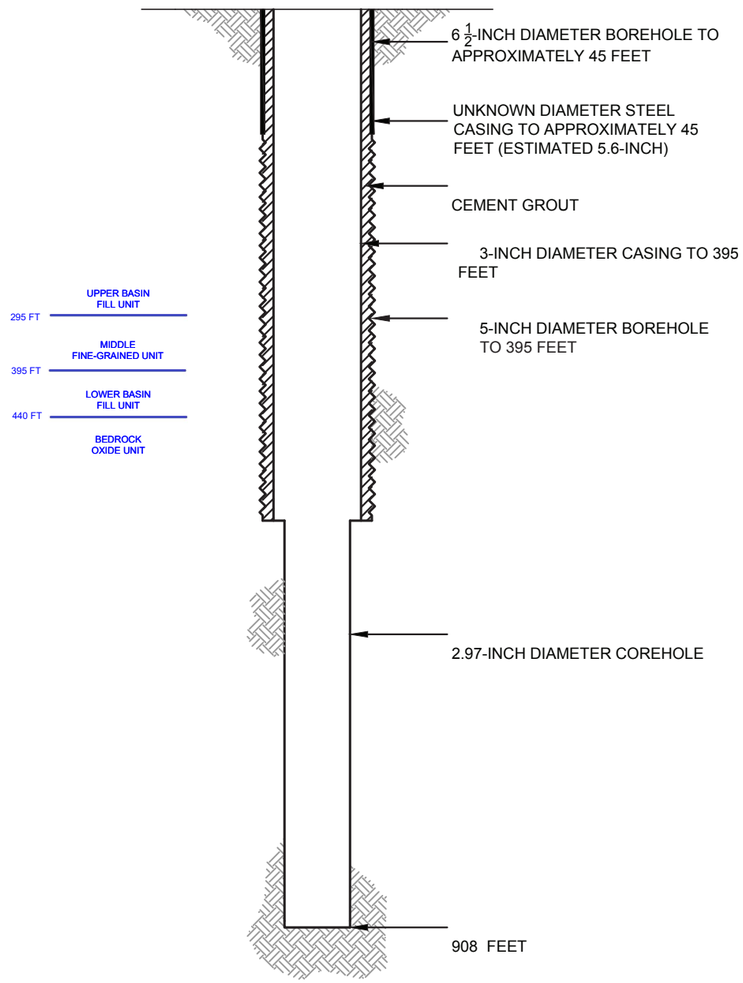
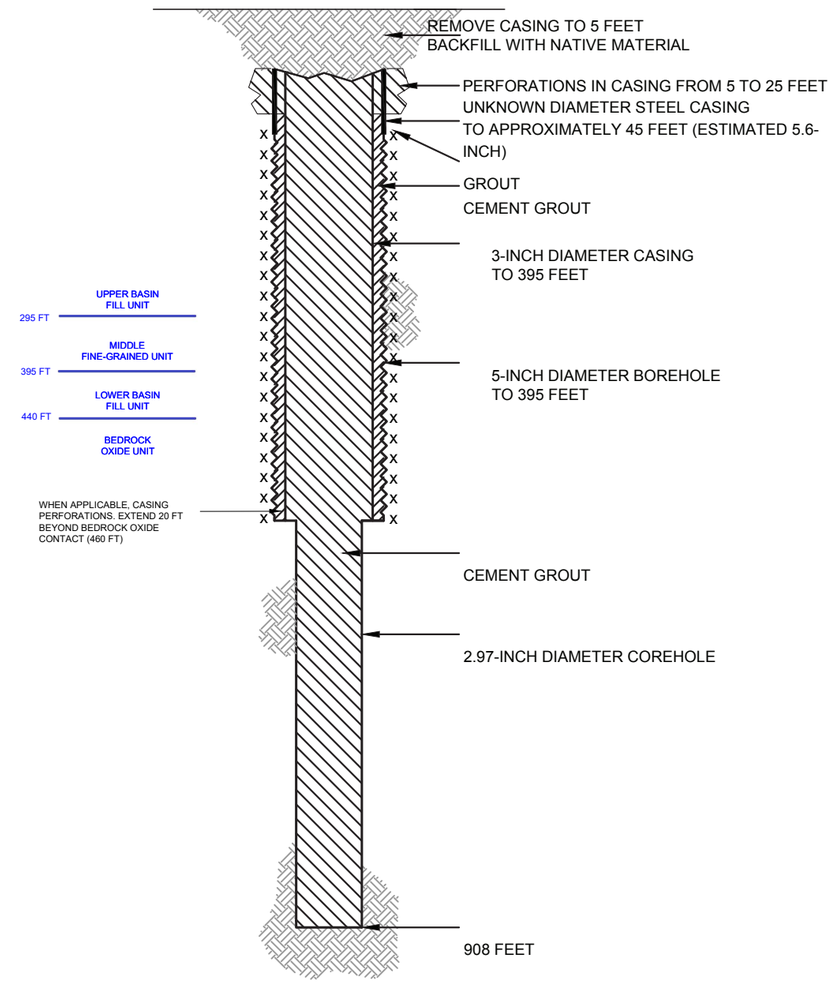
AS-BUILT COREHOLE MCC567



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC567



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC567 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		MCC569

State	County
Arizona	Pinal

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

Latitude 33.05046696

Surface Location

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

Longitude -111.4358831

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

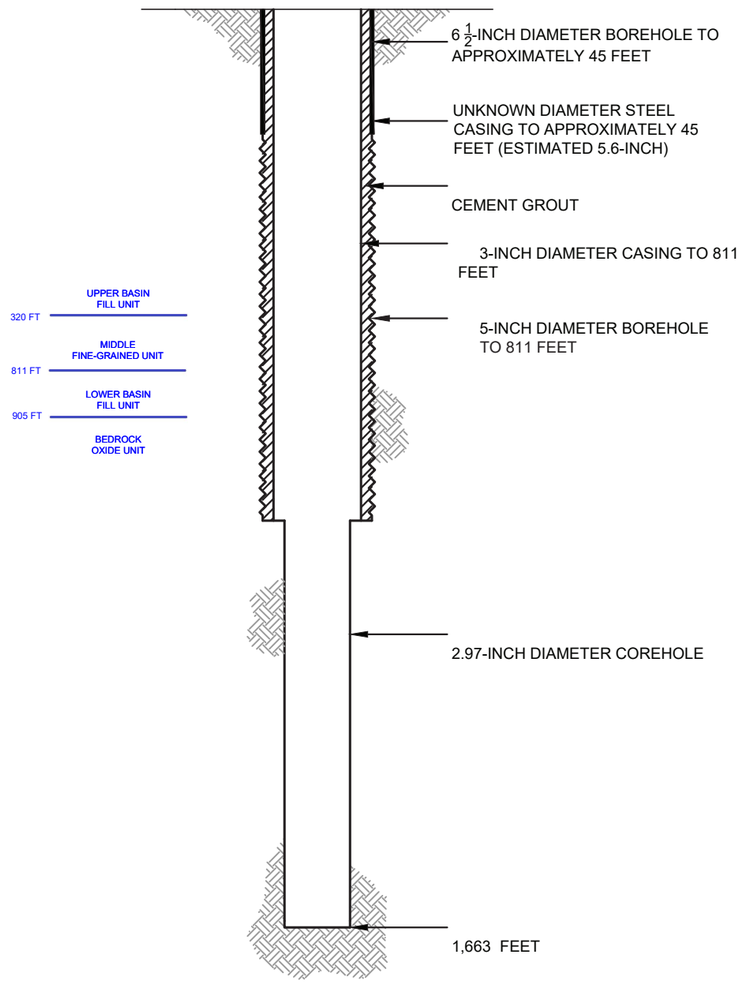
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

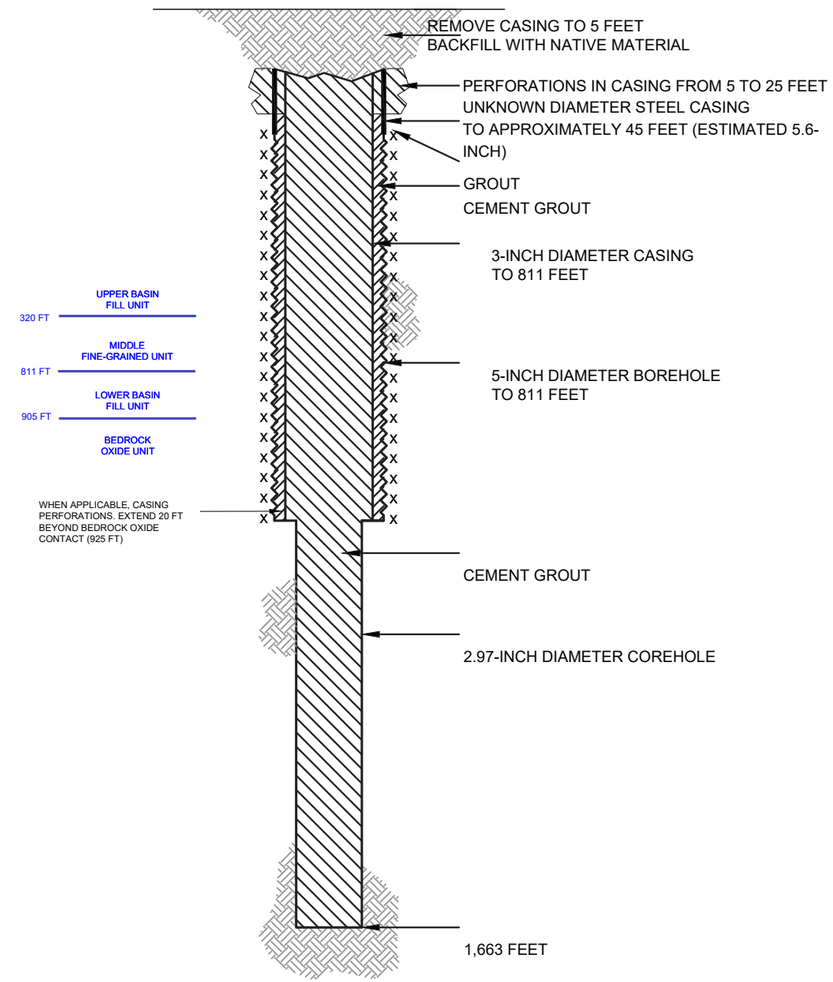
CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

AS-BUILT COREHOLE MCC569



PROPOSED PLUGGING AND ABANDONMENT COREHOLE MCC569



HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE MCC569 DIAGRAM

FLORENCE COPPER INC.

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

MOBINI, GITA Printed: 4/21/2017 12:00 PM Layout: ABANDON (2)
\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\EPAWELLABANDON\415S_ABANDON.DWG

EXHIBIT E-4

Plugging and Abandonment Forms for BHP Class III Test Wells

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-1

State	County
Arizona	Pinal

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

Latitude 33.04692056

Longitude -111.4291914

Surface Location

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

390 **ft. from (N/S)** S **Line of quarter section**

435 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 403 – 740 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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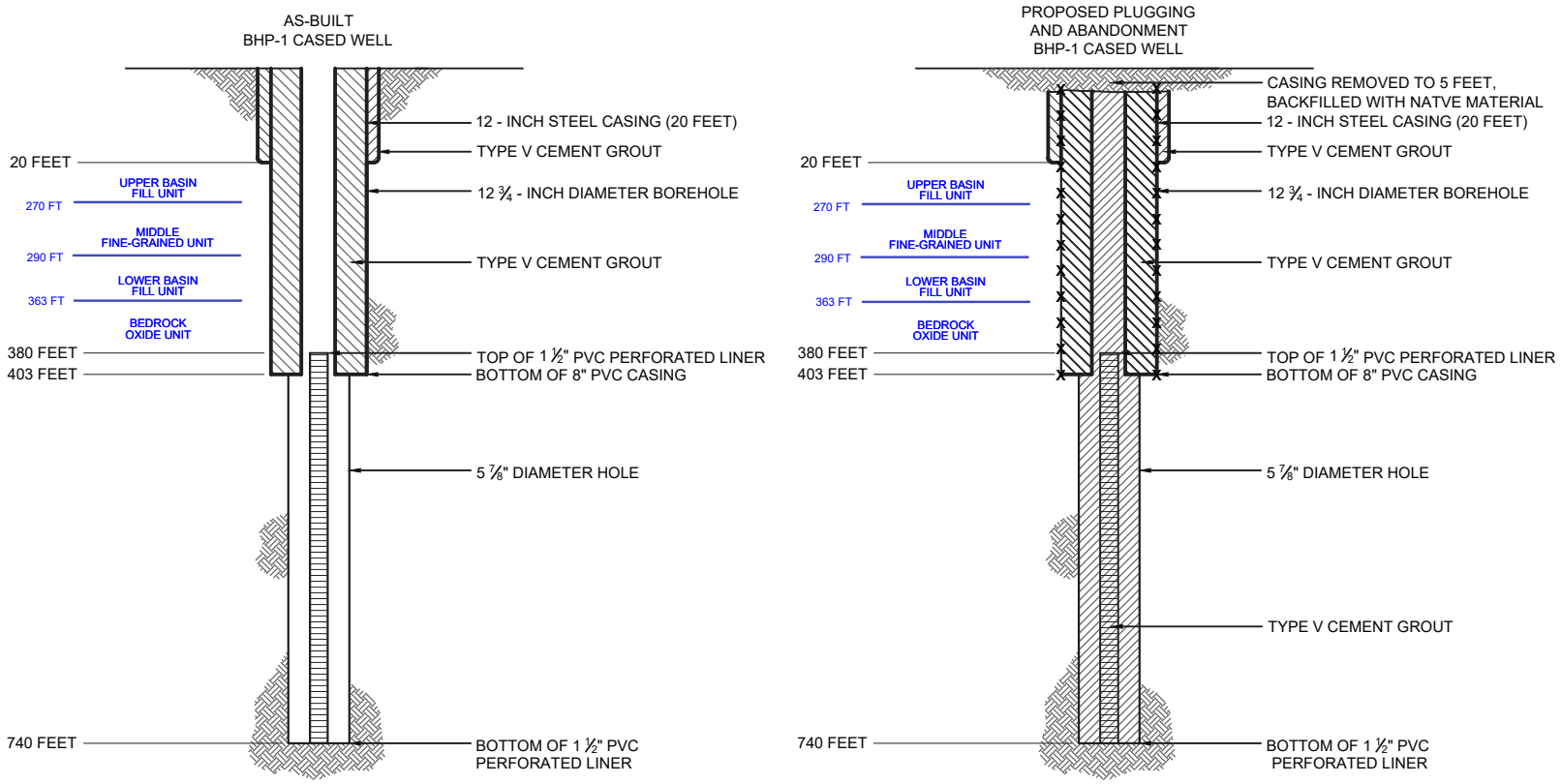
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-1.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-2

State	County
Arizona	Pinal

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

Latitude 33.04678249

Longitude -111.4290257

Surface Location

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

335 **ft. from (N/S)** S **Line of quarter section**

485 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 496 – 770 Feet

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 - General Manager		10/3/2019

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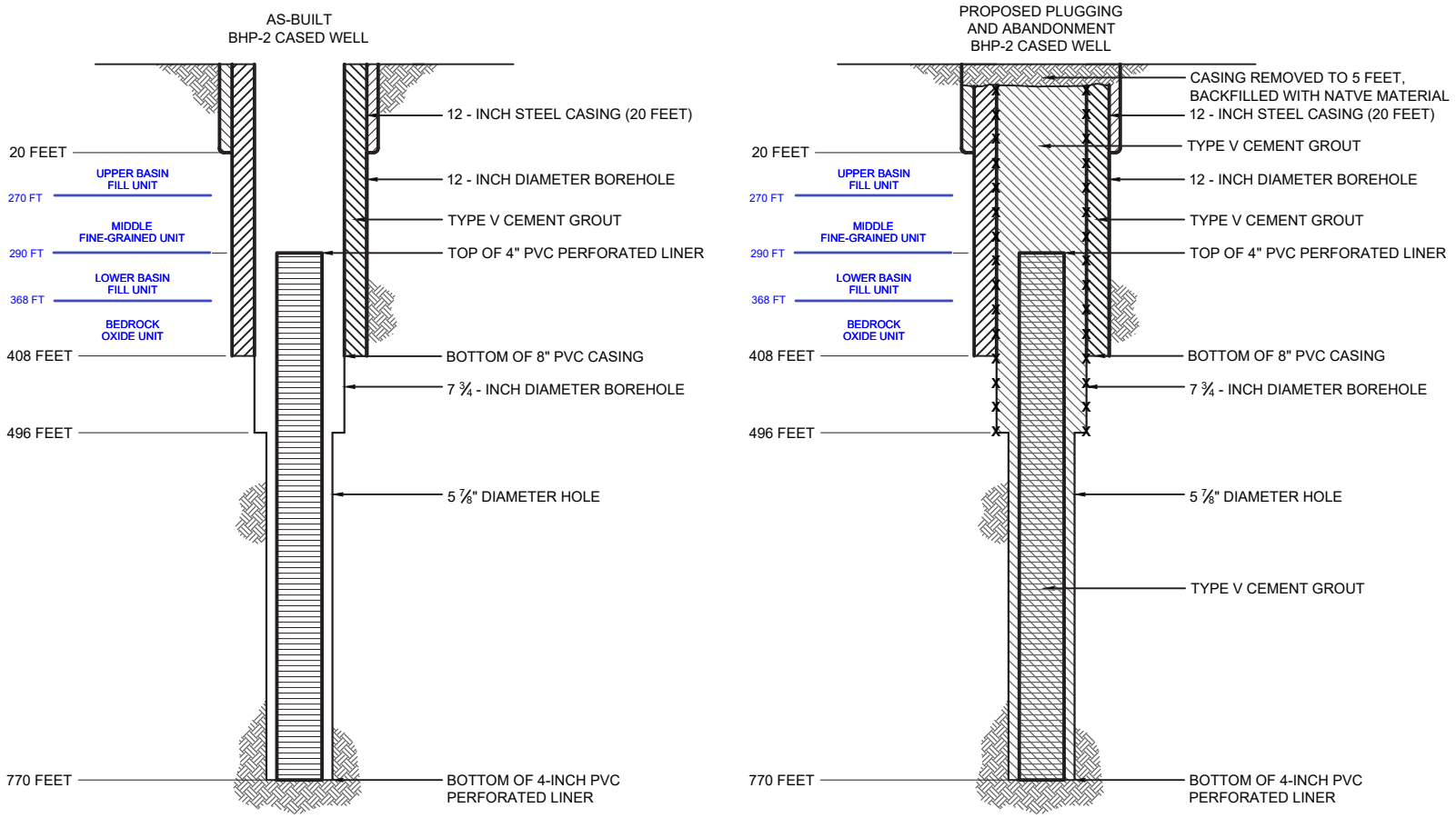
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-2.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-3

State	County
Arizona	Pinal

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

Latitude 33.04706562

Longitude -111.4290339

Surface Location

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

440 **ft. from (N/S)** S **Line of quarter section**

485 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 403 – 860 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

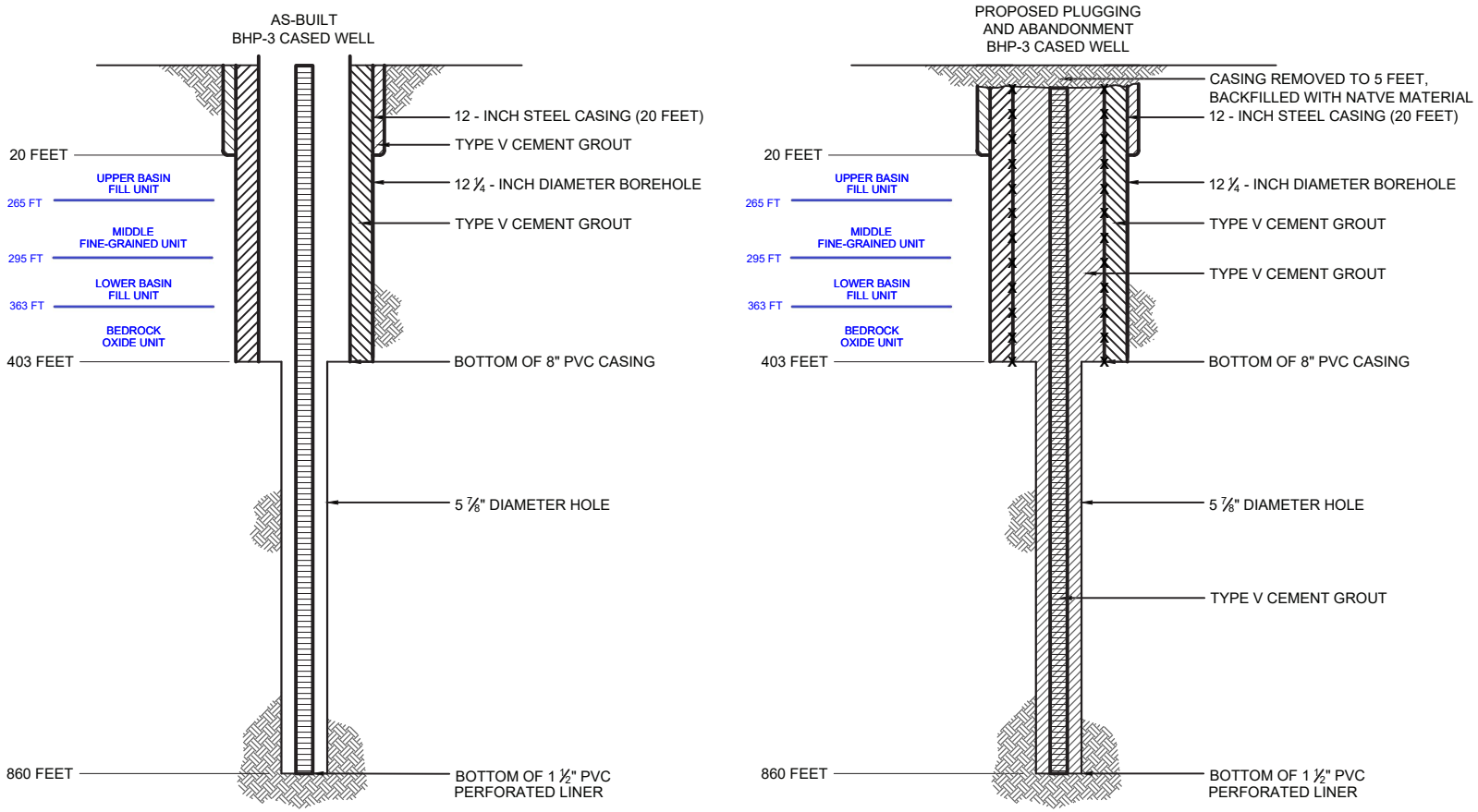
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-4

State	County
Arizona	Pinal

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

Latitude 33.0470669

Longitude -111.4293602

Surface Location

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

440 **ft. from (N/S)** S **Line of quarter section**

385 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 403 – 742 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

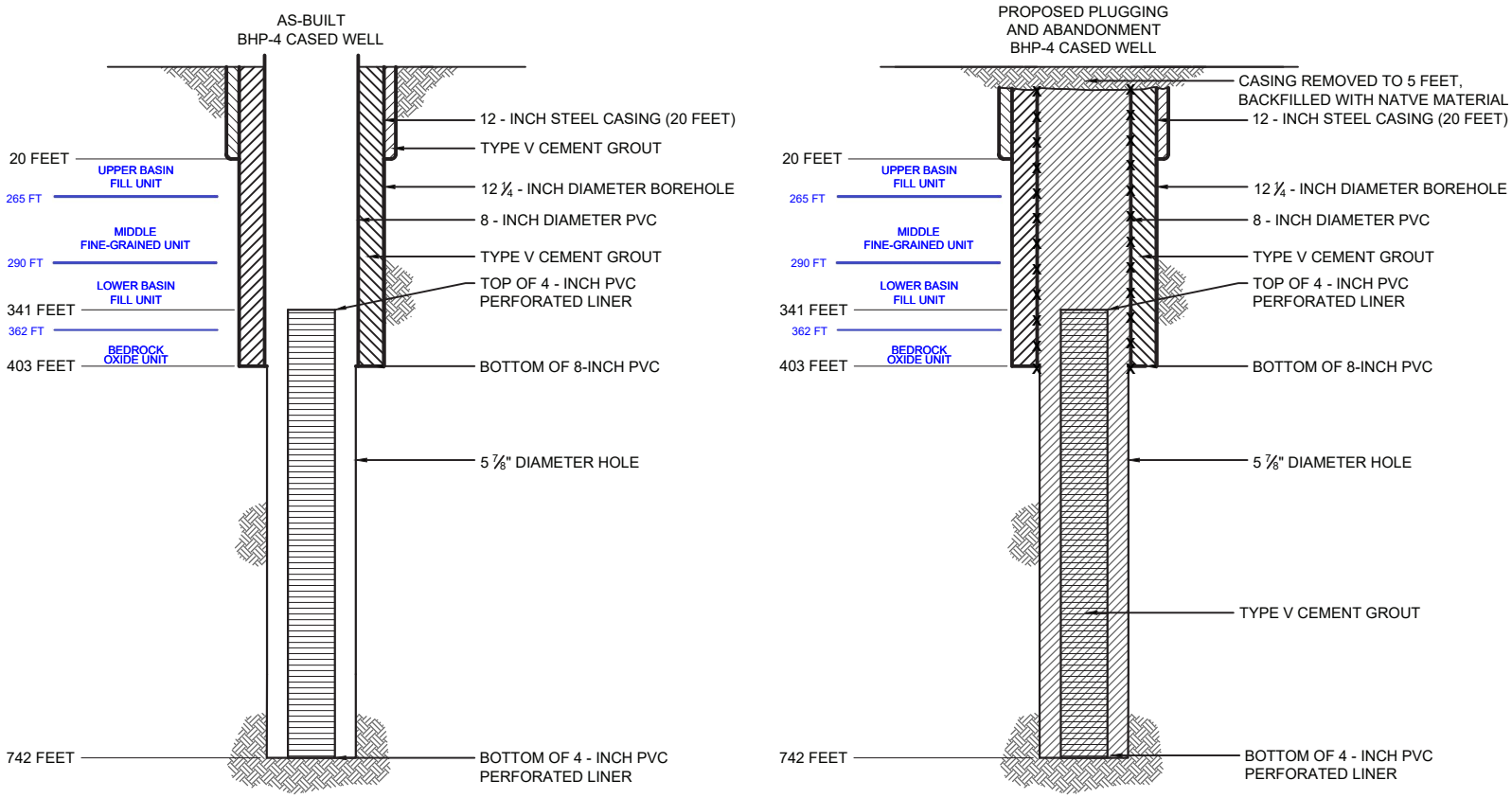
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-5

State	County
Arizona	Pinal

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

Latitude 33.04679477

Longitude -111.4293552

Surface Location

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

340 **ft. from (N/S)** S **Line of quarter section**

385 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 403 – 776 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

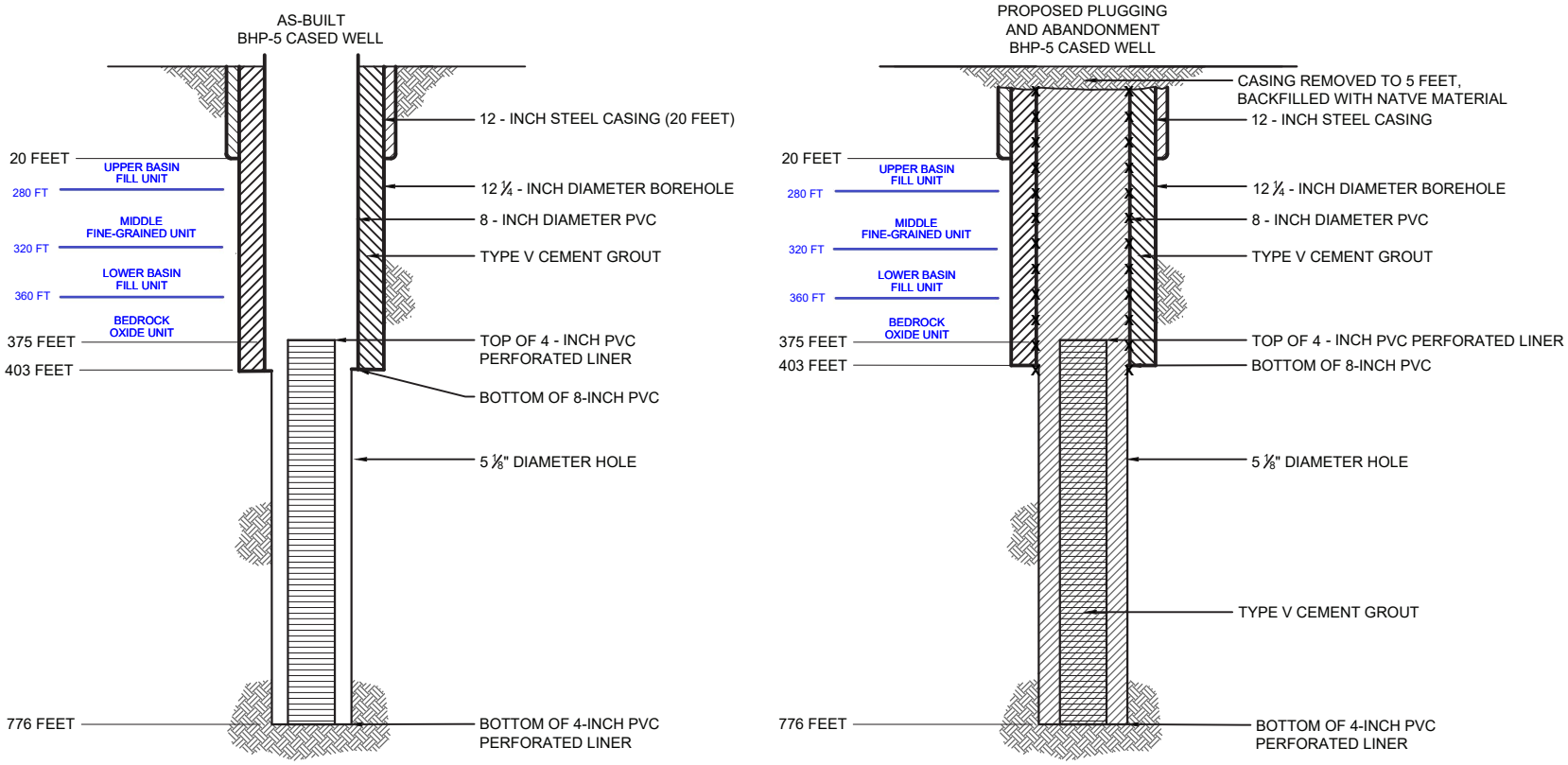
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-6

State	County
Arizona	Pinal

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

Latitude 33.04691995

Longitude -111.4290347

Surface Location

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

385 **ft. from (N/S)** S **Line of quarter section**

485 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 410 – 805 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

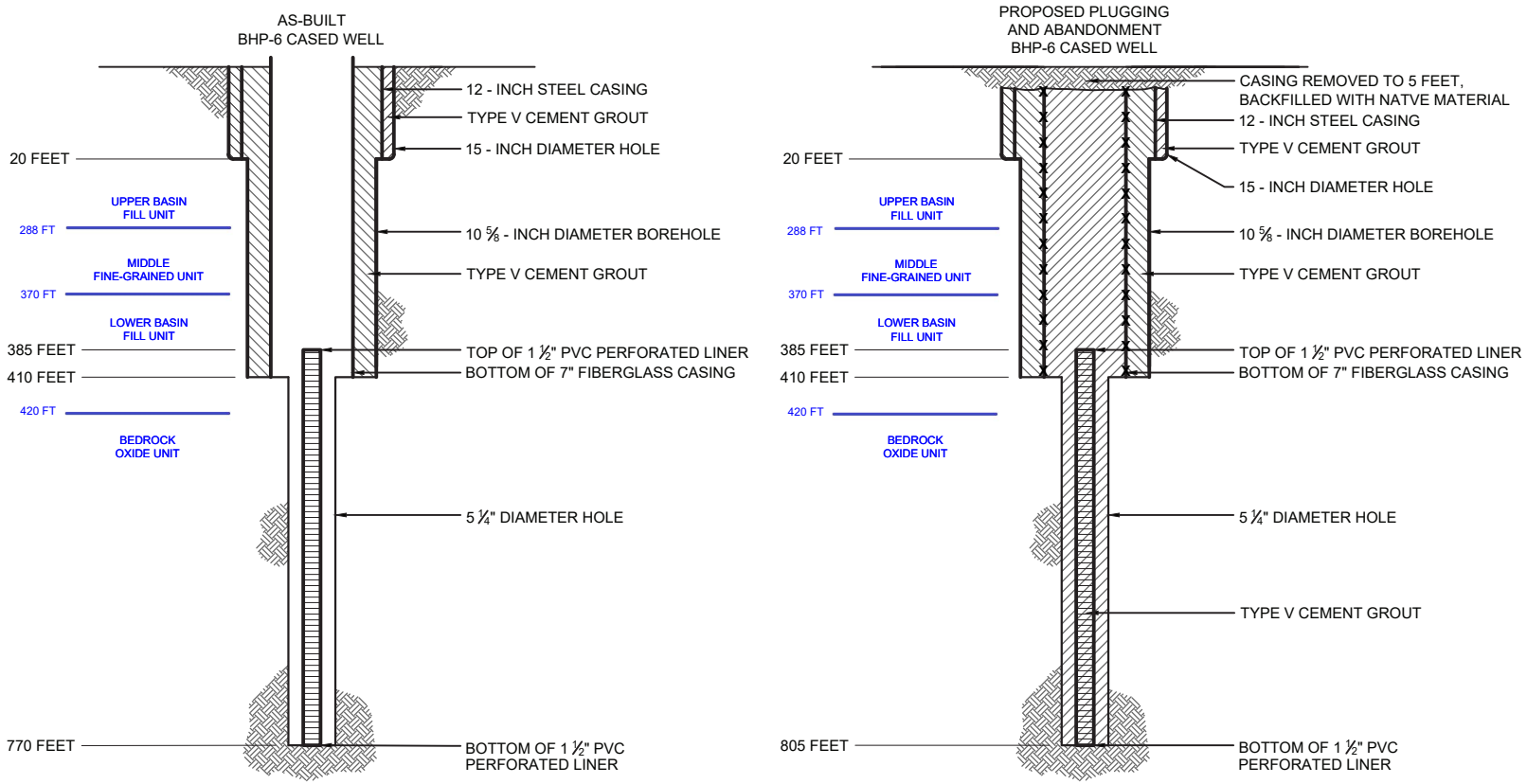
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-7

State	County
Arizona	Pinal

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

Latitude 33.04706074

Longitude -111.4291906

Surface Location

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

440 **ft. from (N/S)** S **Line of quarter section**

435 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 410 – 760 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

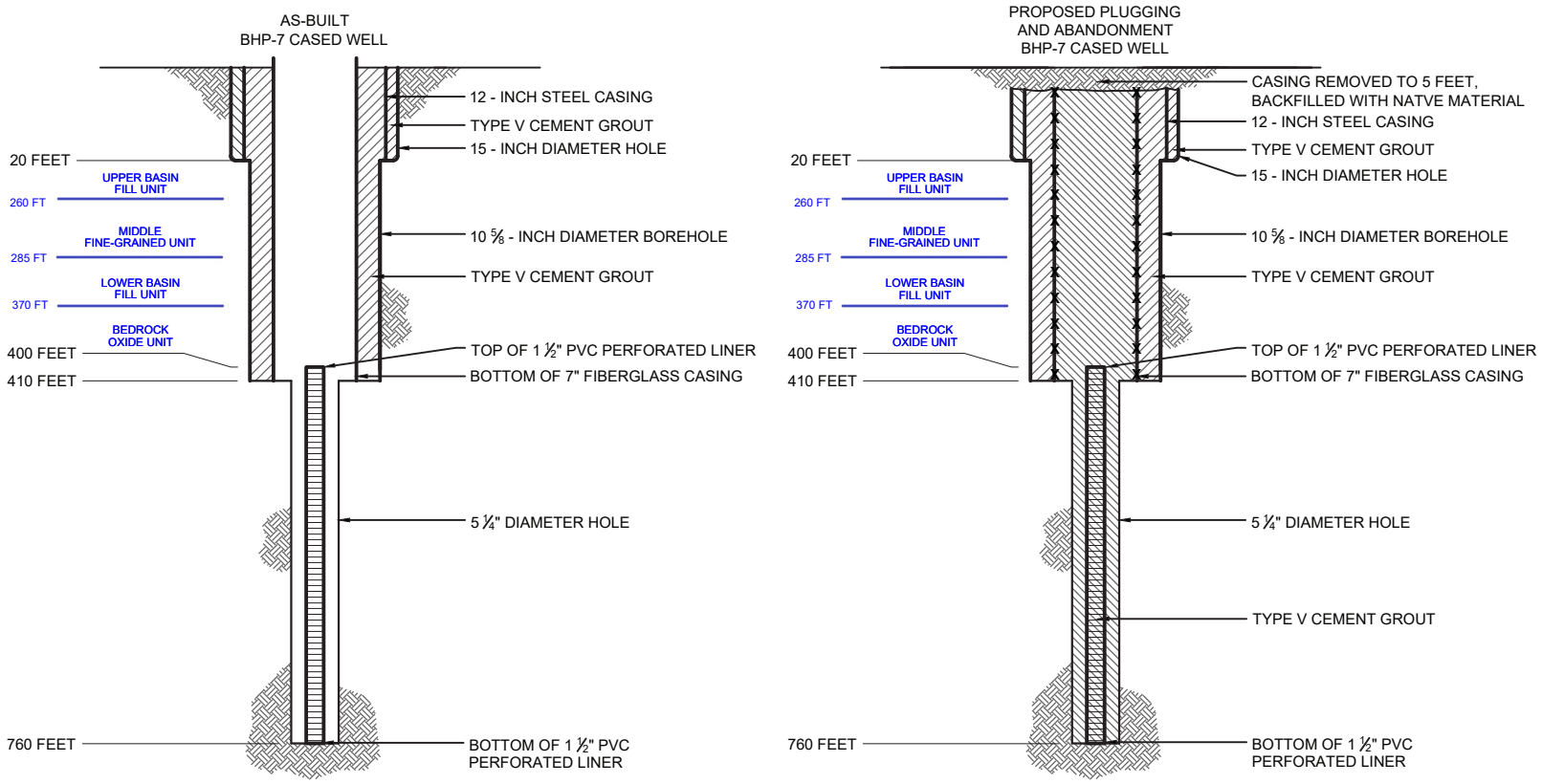
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-8

State	County
Arizona	Pinal

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

Latitude 33.04692396

Longitude -111.4293578

Surface Location

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

385 **ft. from (N/S)** S **Line of quarter section**

385 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 410 – 780 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

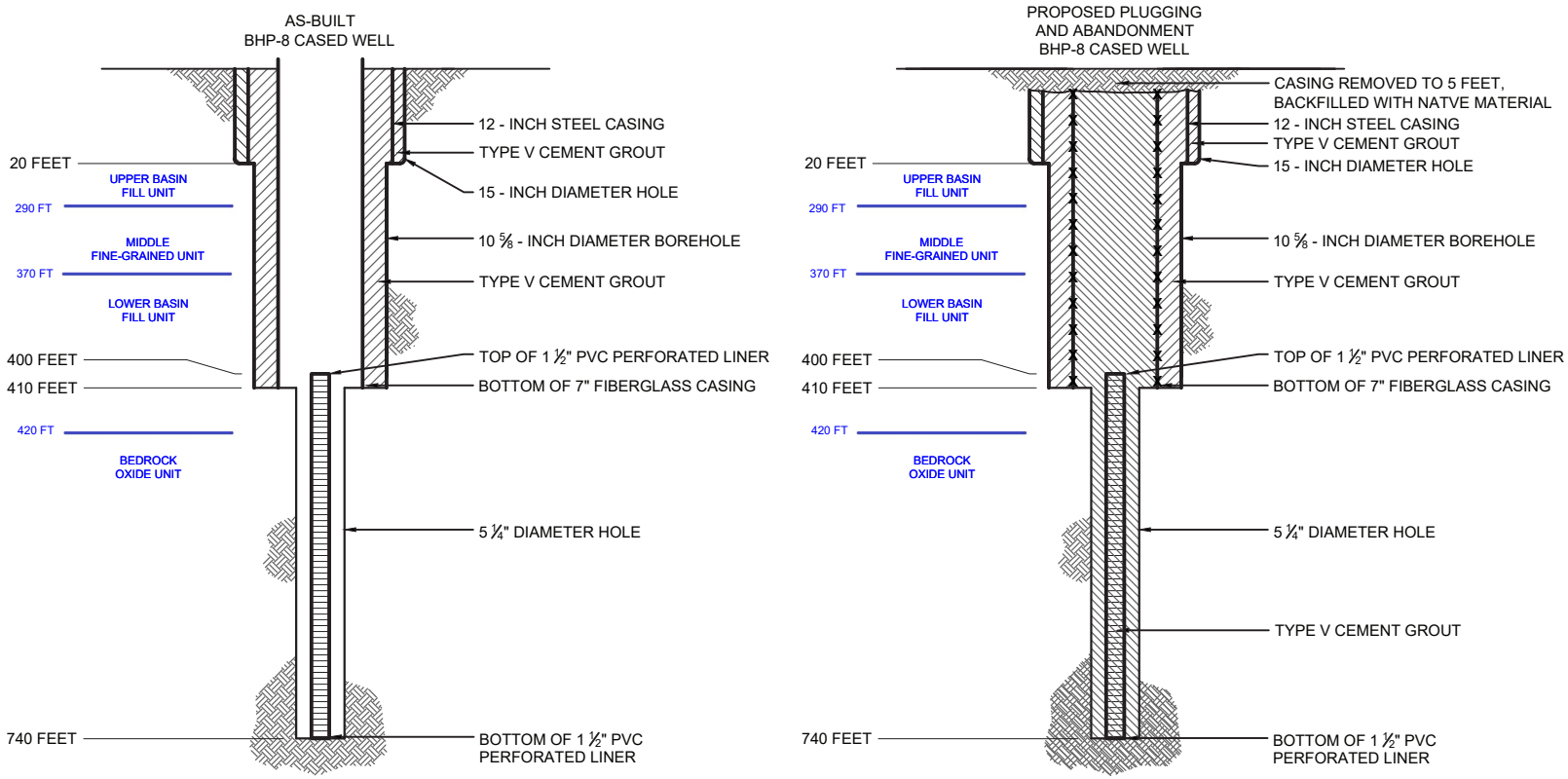
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-9

State	County
Arizona	Pinal

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

Latitude 33.04678591

Longitude -111.4291986

Surface Location

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

335 **ft. from (N/S)** S **Line of quarter section**

435 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 410 – 840 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

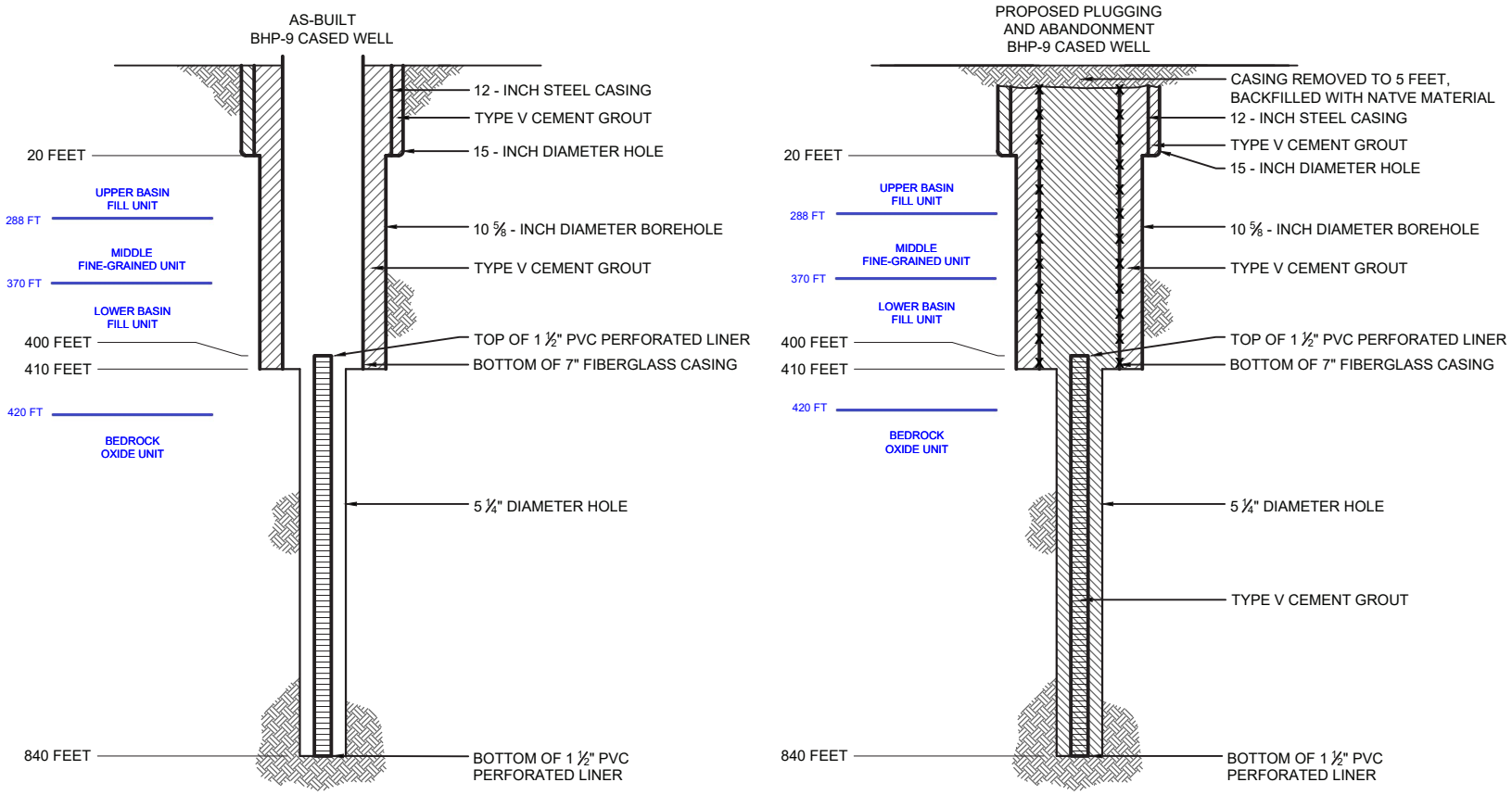
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-10

State	County
Arizona	Pinal

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

Latitude 33.0469193

Longitude -111.4288683

Surface Location

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

385 **ft. from (N/S)** S **Line of quarter section**

535 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 400 – 820 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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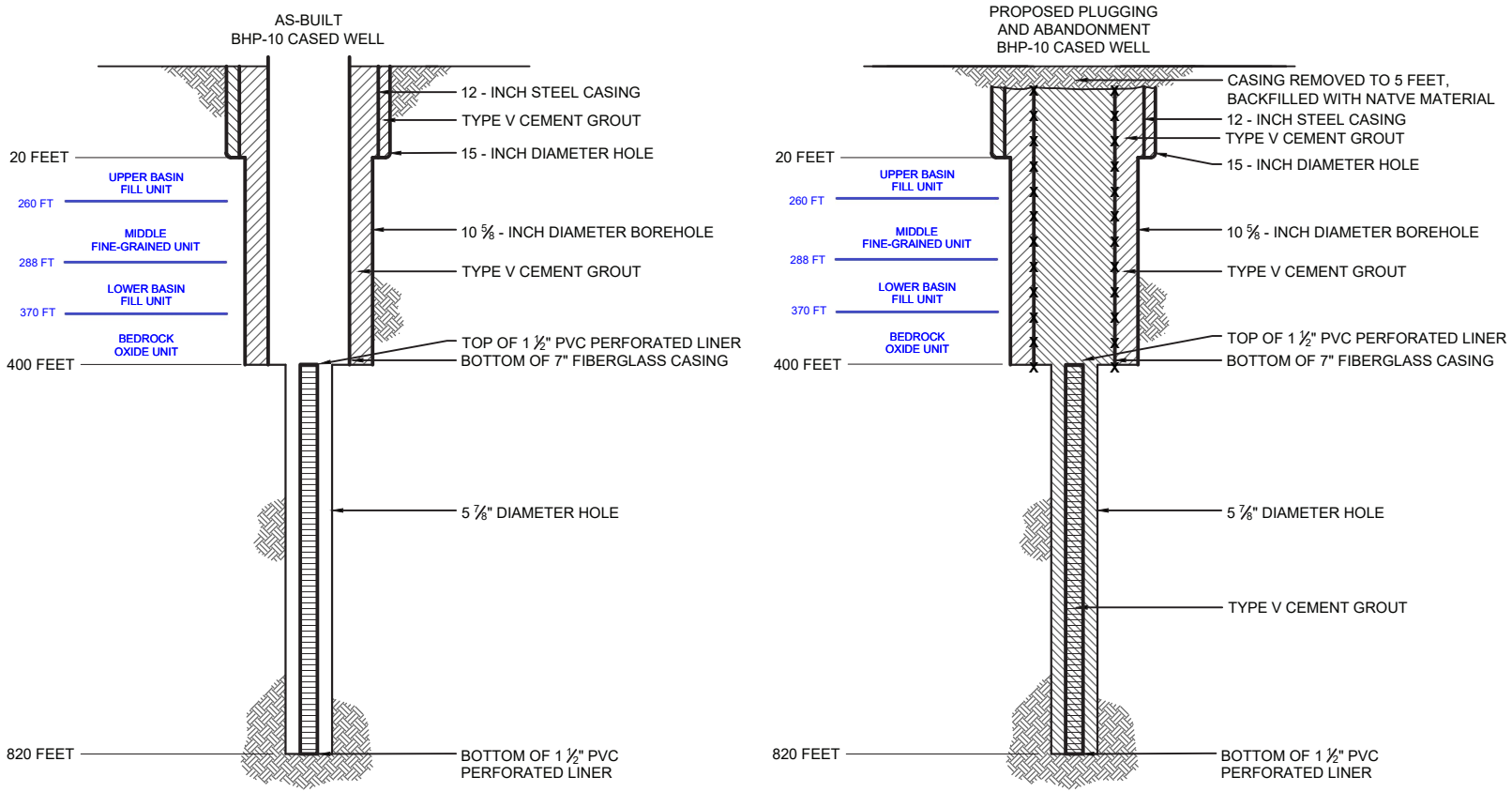
For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-11

State	County
Arizona	Pinal

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

Latitude 33.04720368

Longitude -111.4291931

Surface Location

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

490 **ft. from (N/S)** S **Line of quarter section**

435 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

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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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 400 – 805 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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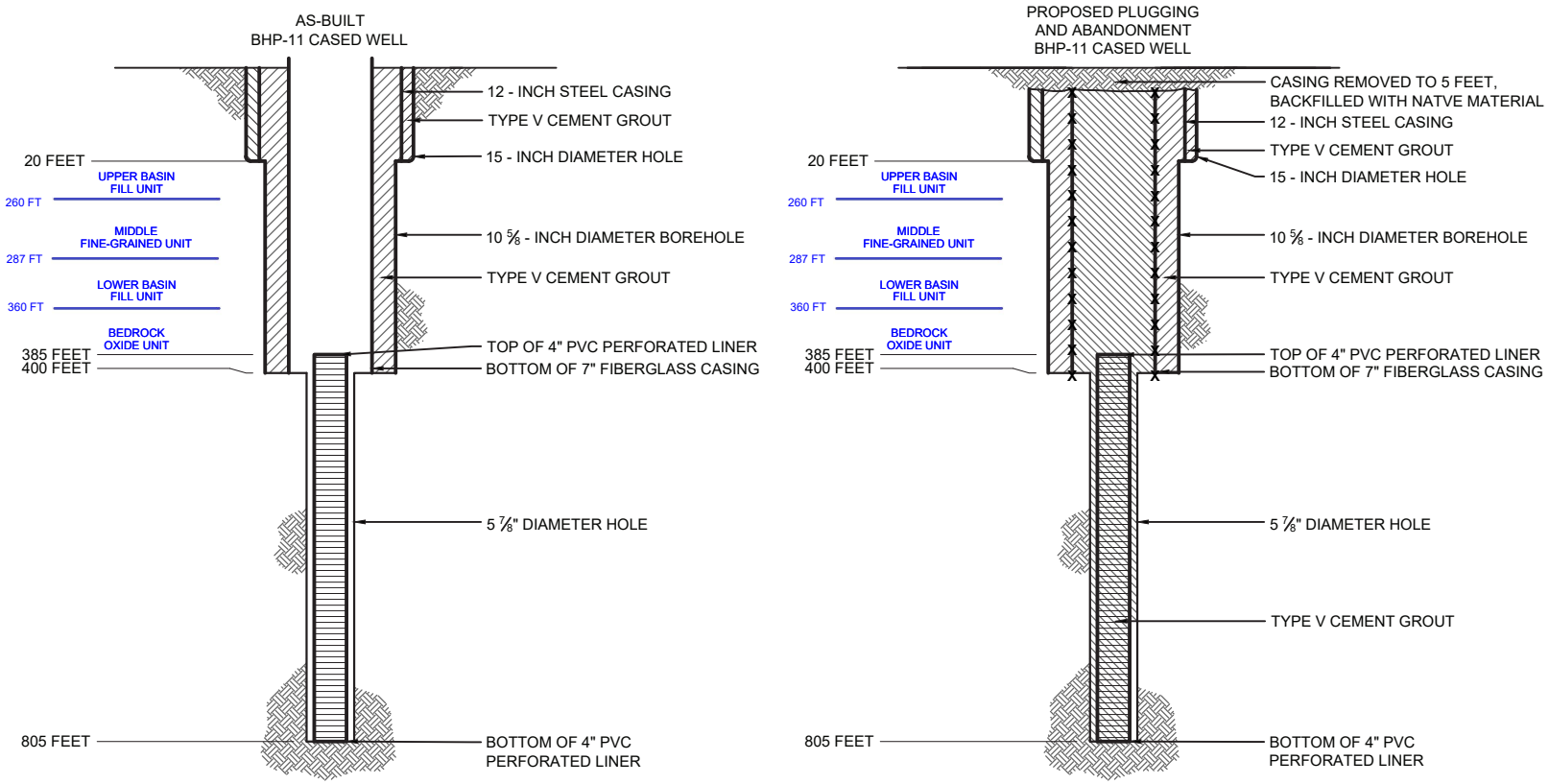
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-11.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-12

State	County
Arizona	Pinal

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

Latitude 33.04692185

Longitude -111.429521

Surface Location

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

385 **ft. from (N/S)** S **Line of quarter section**

335 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 400 – 770 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

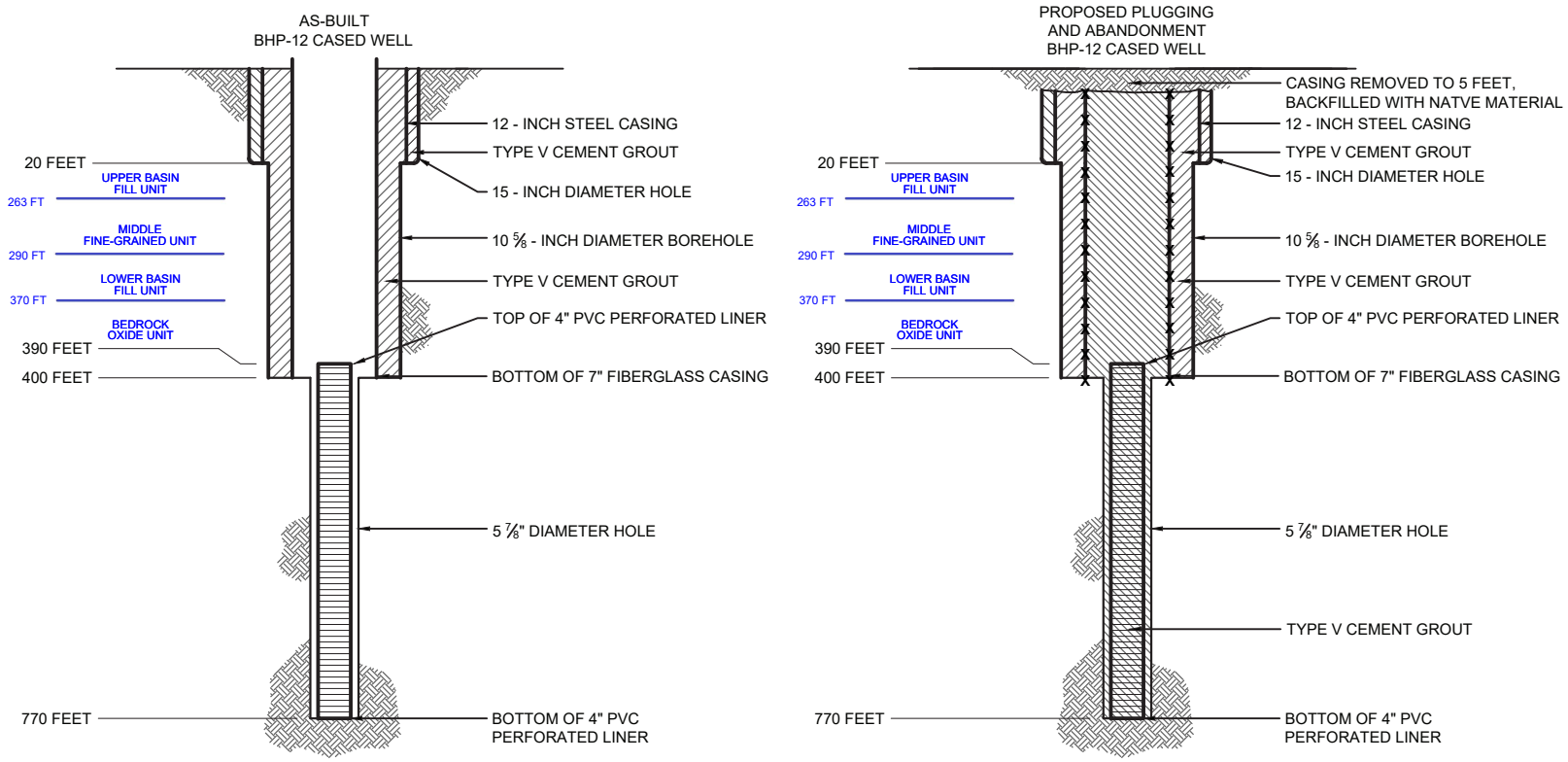
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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

WELL DESIGN DETAILS ARE BASED ON BHP RECORDS.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		BHP-13

State	County
Arizona	Pinal

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

Latitude 33.04664847

Longitude -111.4291961

Surface Location

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

290 **ft. from (N/S)** S **Line of quarter section**

435 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
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Perforated Interval: 420 – 826 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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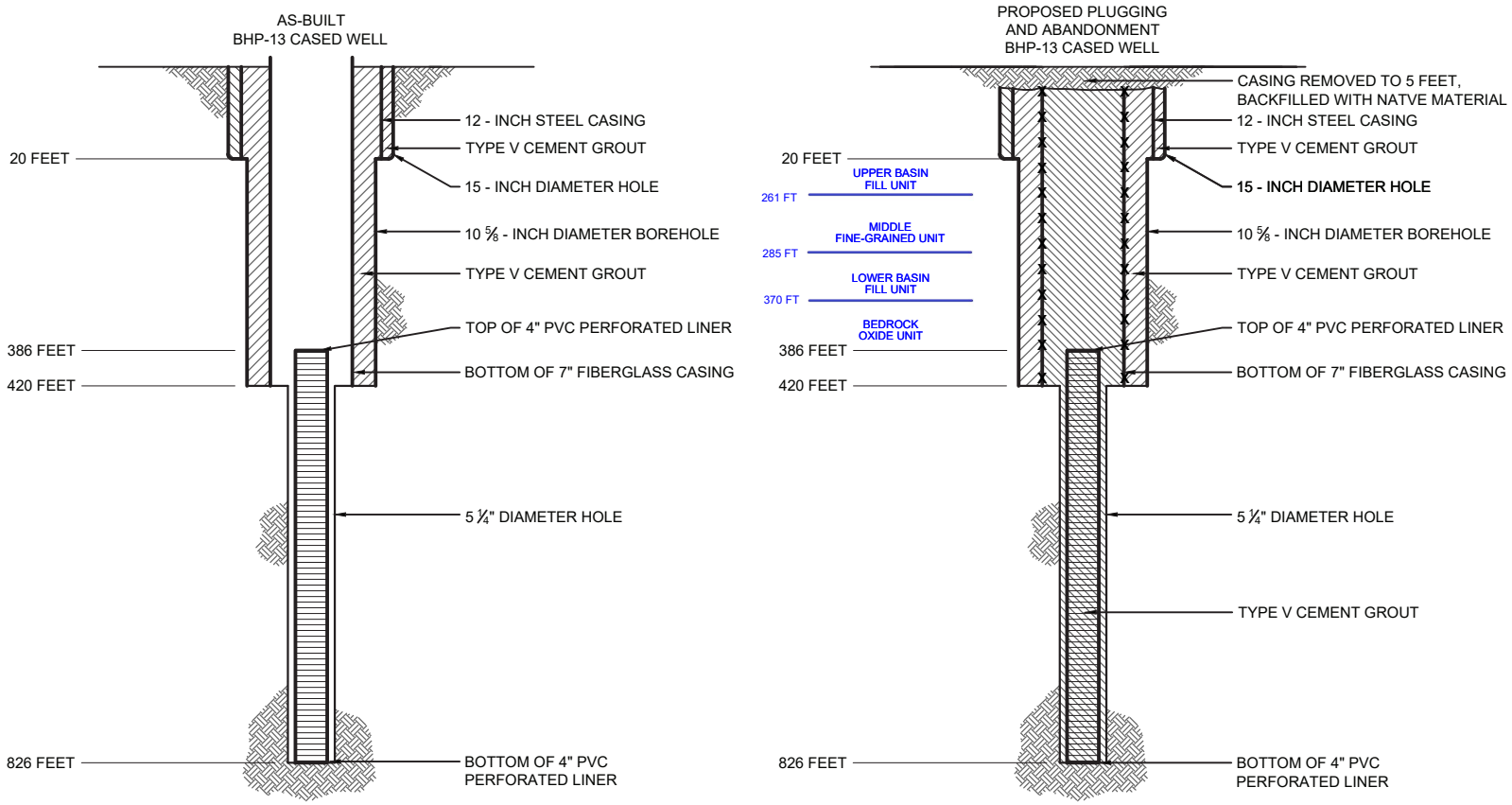
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\BHP-13.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



NOTE

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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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		CH-1

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Perforated Interval: 420 - 520, 560 - 660, 700 - 780 Feet

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 - General Manager		10/3/2019

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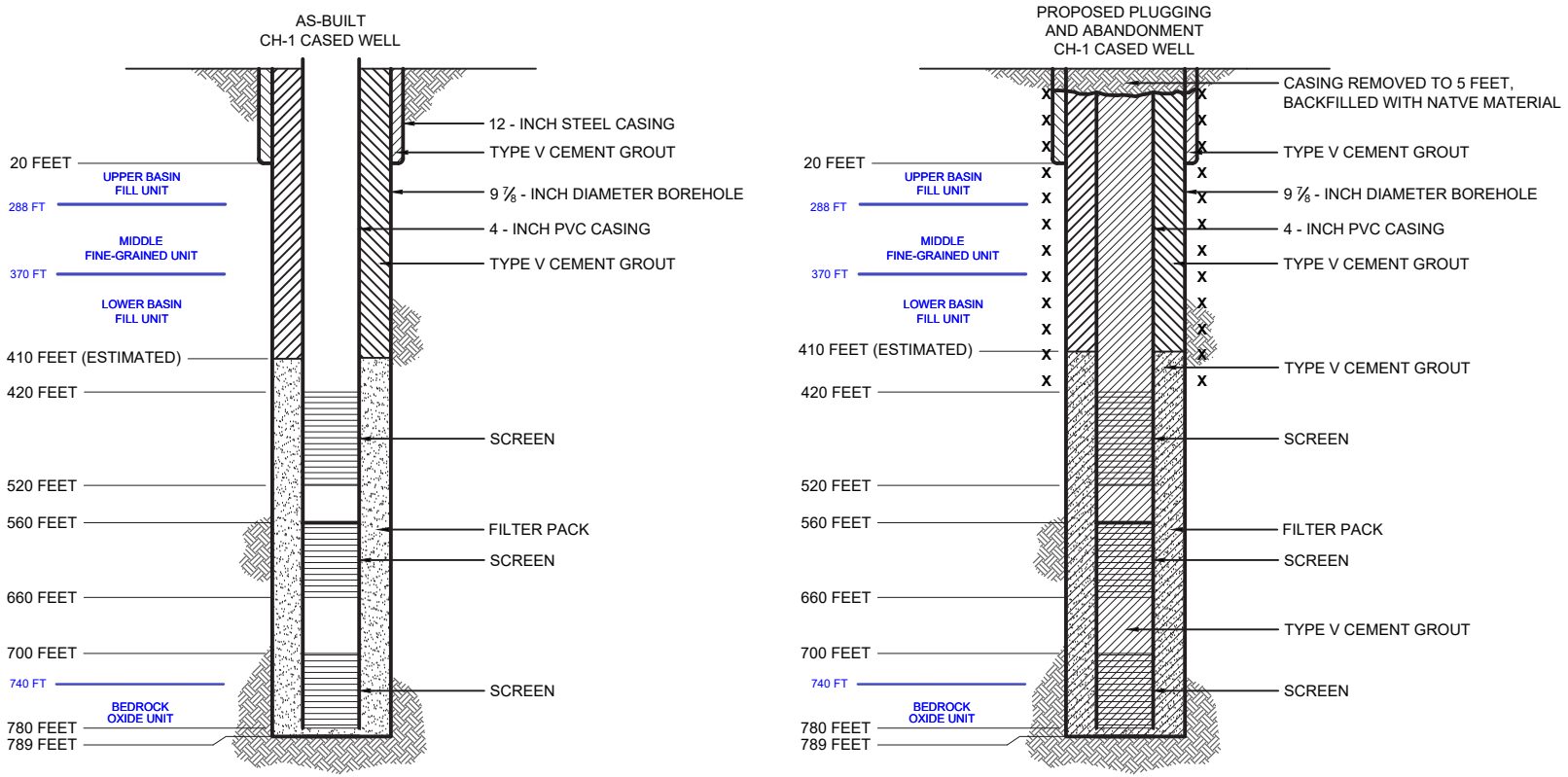
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\CH-1.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



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 4/30/2022

United States Environmental Protection Agency

EPA

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		CH-2

State	County
Arizona	Pinal

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

Latitude 33.04695034

Longitude -111.4290737

Surface Location

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

400 **ft. from (N/S)** S **Line of quarter section**

470 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 420 - 520, 560 - 660, 700 - 760 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

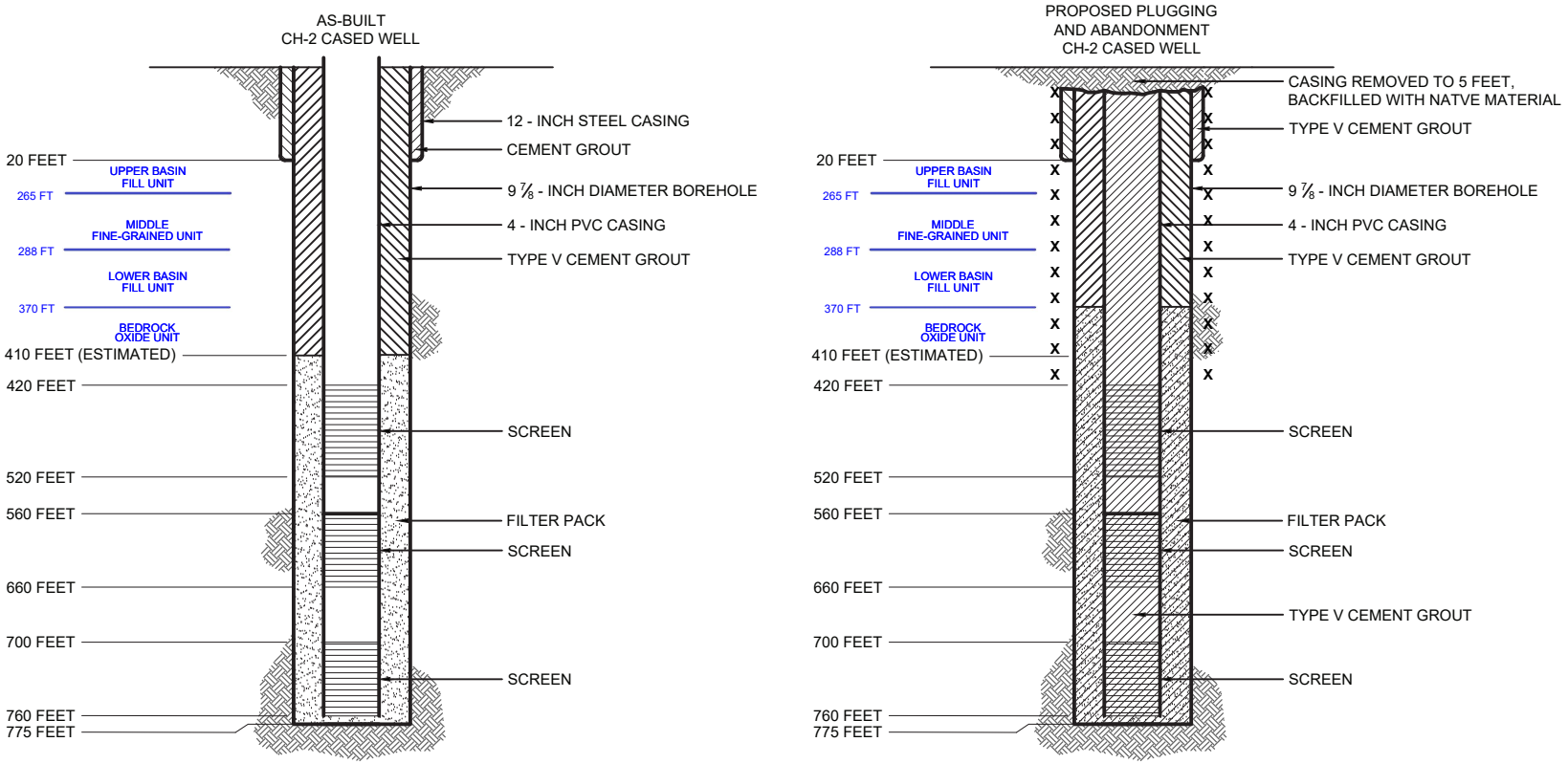
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

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R9UIC-AZ3-FY11-1		M2-GU

State	County
Arizona	Pinal

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

Latitude 33.04363387

Surface Location

NE **1/4 of** NE **1/4 of Section** 33 **Township** 4S **Range** 9E

Longitude -111.4217481

_____ **ft. from (N/S)** _____ **Line of quarter section**

_____ **ft. from (E/W)** _____ **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

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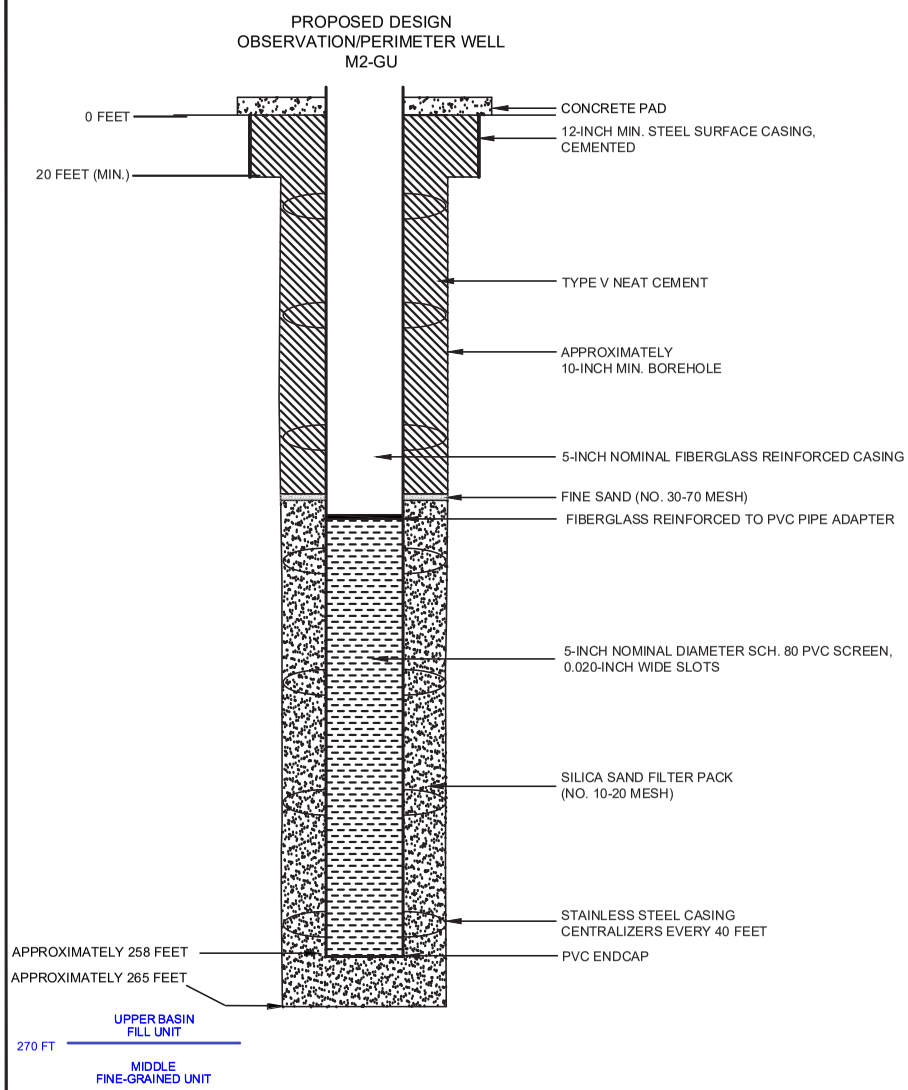

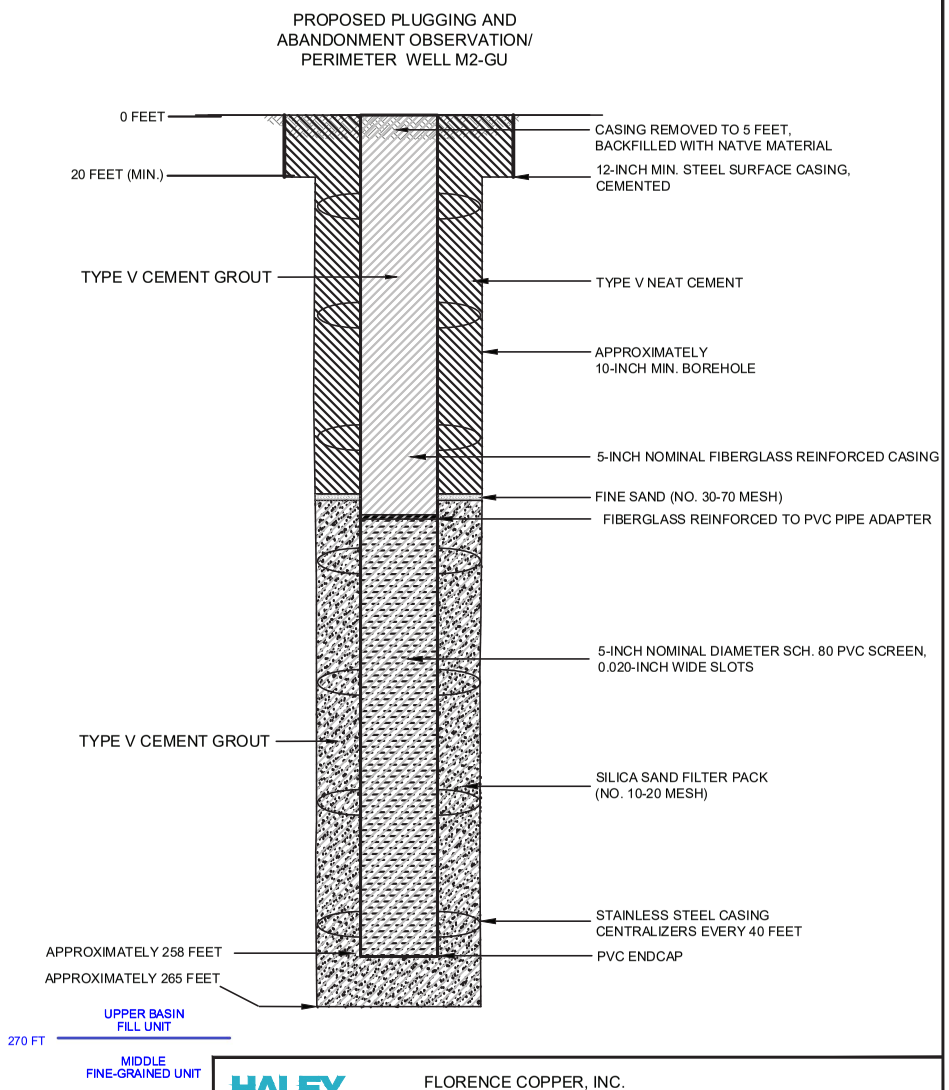

NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

HALEY ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC
OBSERVATION/PERIMETER
WELL M2-GU

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

OMB No. 2040-0042 Approval Expires 4/30/2022

United States Environmental Protection Agency

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435 **ft. from (N/S)** S **Line of quarter section**

535 **ft. from (E/W)** W **Line of quarter section.**

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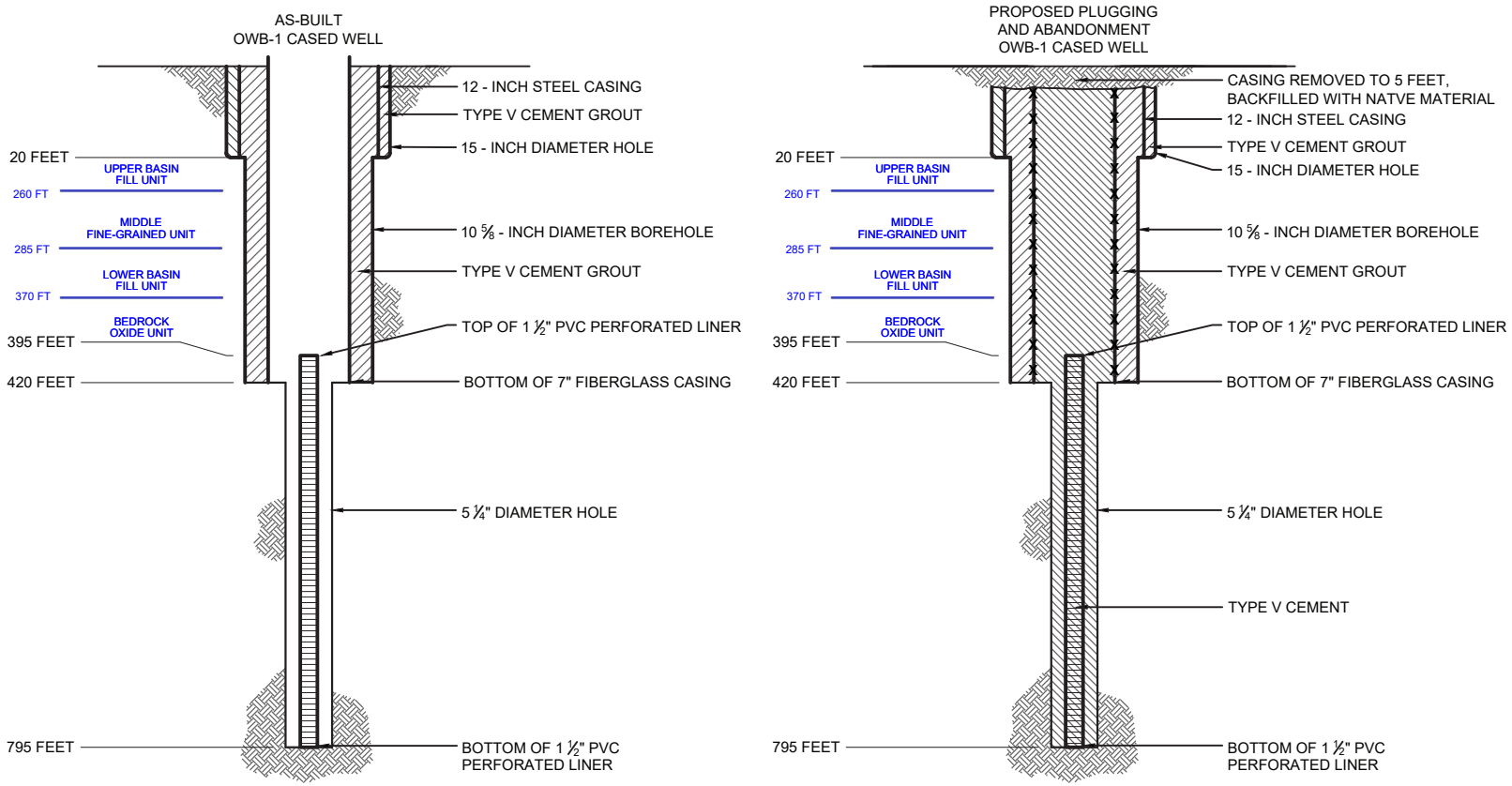
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\OWB-1.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		OWB-2

State	County
Arizona	Pinal

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

Latitude 33.04720431

Longitude -111.4293562

Surface Location

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

490 **ft. from (N/S)** S **Line of quarter section**

385 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 200 - 220 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

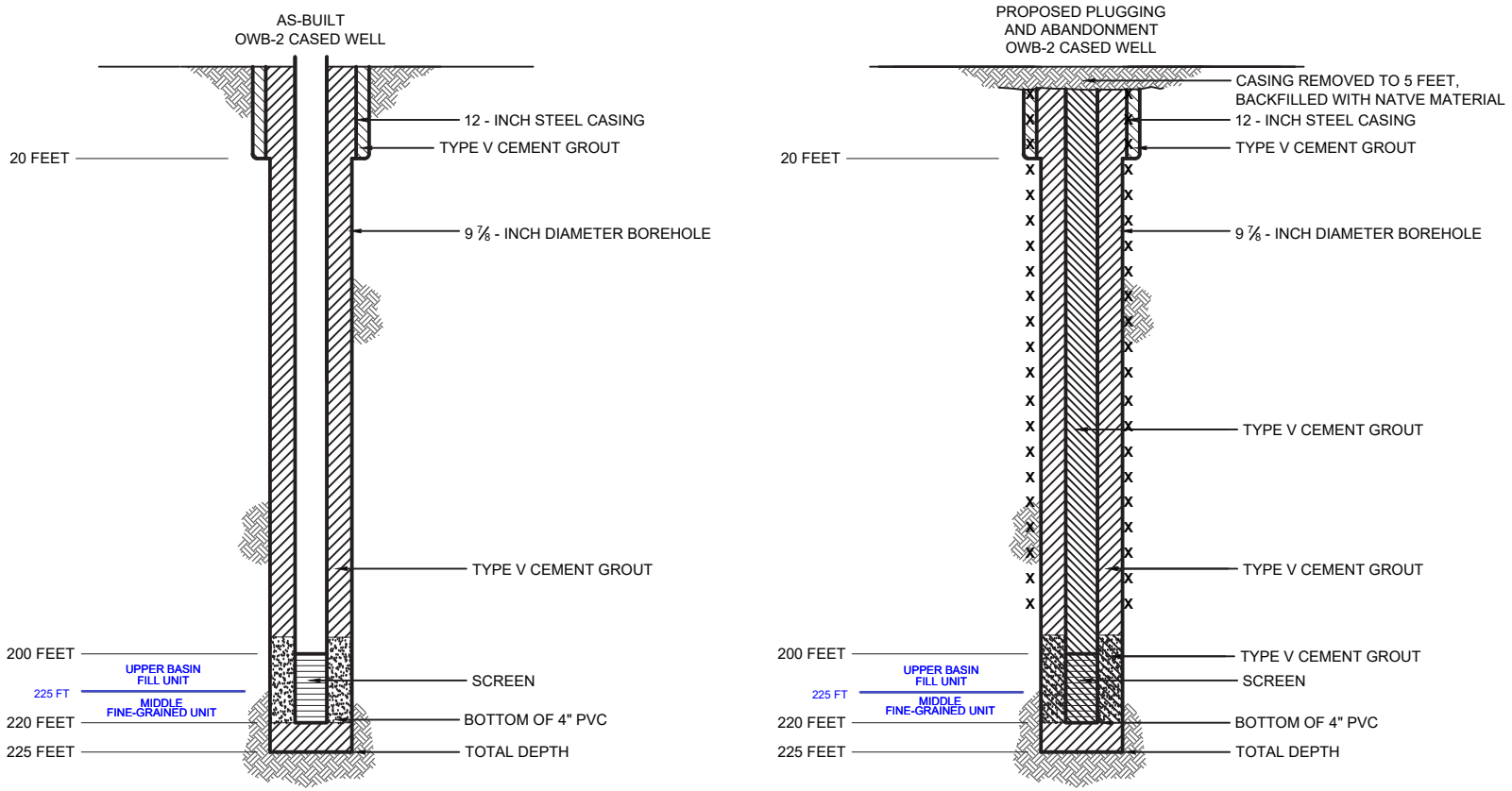
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		OWB-3

State	County
Arizona	Pinal

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

Latitude 33.04706752

Longitude -111.4295202

Surface Location

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

440 **ft. from (N/S)** S **Line of quarter section**

335 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 420 - 796 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

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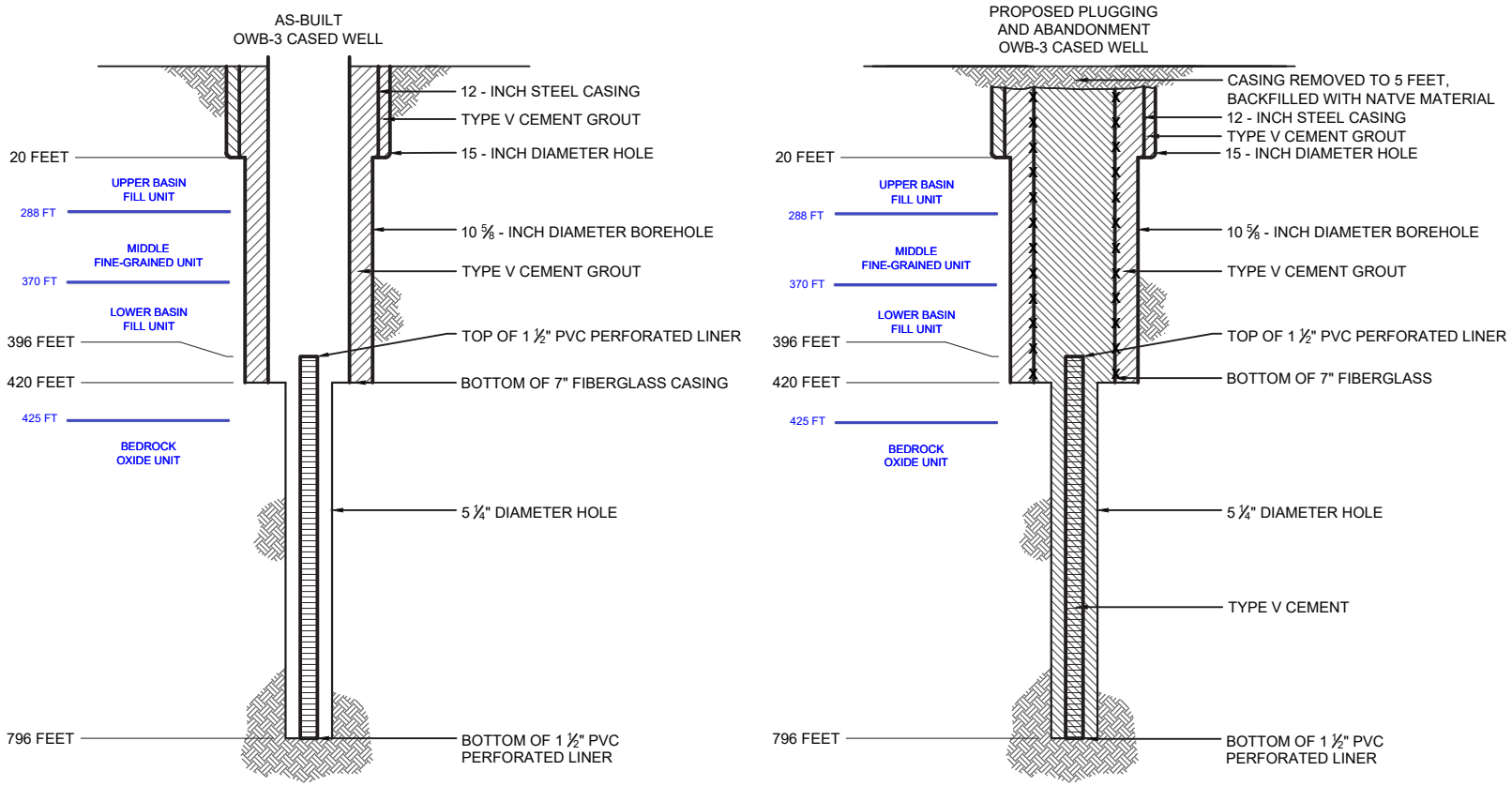
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\OWB-3.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		OWB-4

State	County
Arizona	Pinal

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

Latitude 33.04678718

Longitude -111.429525

Surface Location

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

335 **ft. from (N/S)** S **Line of quarter section**

335 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
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Perforated Interval: 410 - 745 Feet

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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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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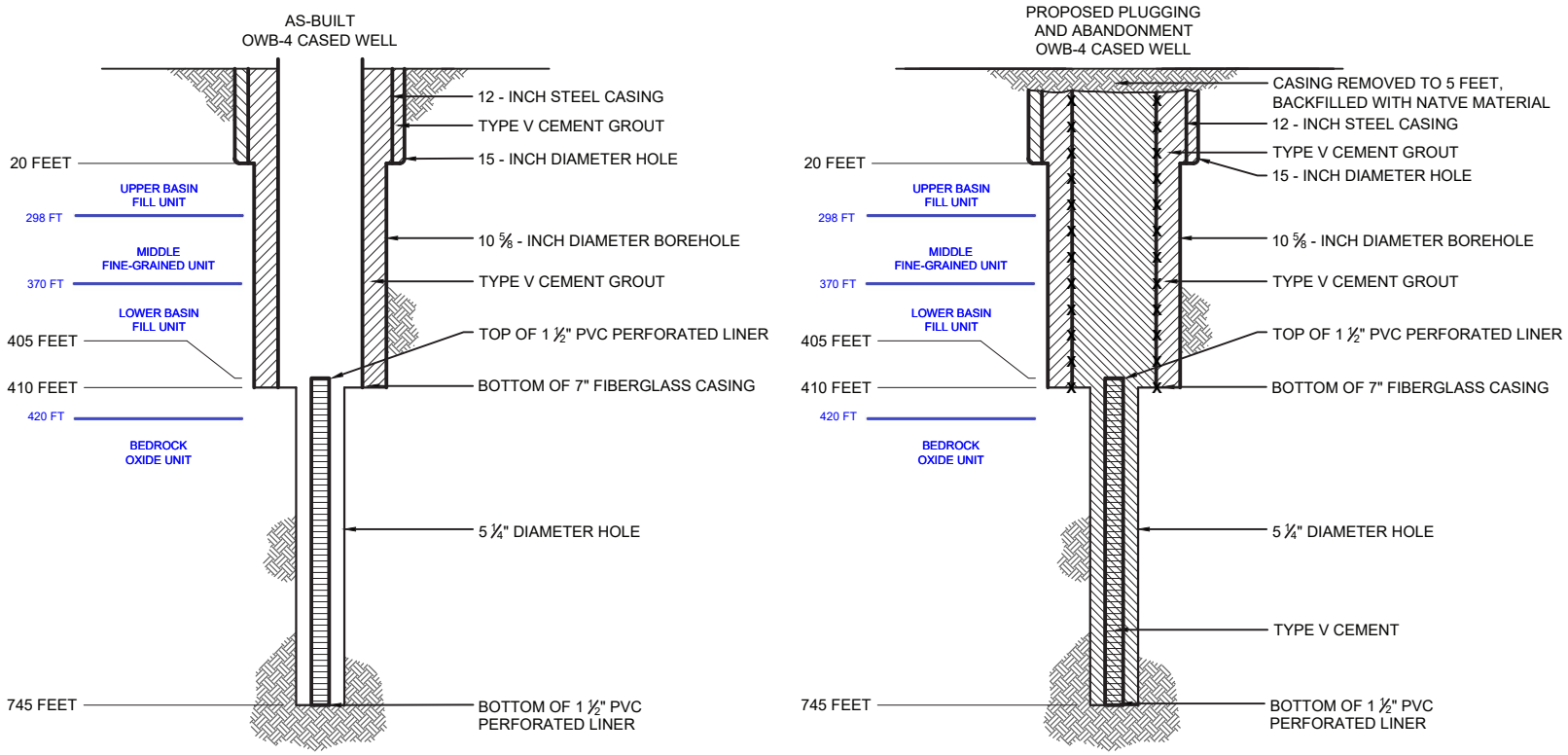
Drawing Name: G:\PROJECTS\CURIS RESOURCES\38706-CURIS FEASIBILITY\DRAWINGS\JULY 2014 UIC APP\BHP WELL SCHEMATICS\OWB-4.DWG
Operator Name: CANDREVA, LAUREN Plot Date: August 5, 2014 Drawing Layout: HA-FIG-A-L



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 4/30/2022

United States Environmental Protection Agency

WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number	API Number	Full Well Name
R9UIC-AZ3-FY11-1		OWB-5

State	County
Arizona	Pinal

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

Latitude 33.04678462

Longitude -111.428869

Surface Location

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

335 **ft. from (N/S)** S **Line of quarter section**

535 **ft. from (E/W)** W **Line of quarter section.**

Well Class	Timing of Action (pick one)	Type of Action (pick one)
☐ Class I ☐ Class II ☑ Class III ☐ Class V	☑ Notice Prior to Work Date Expected to Commence March 2021 ☐ Report After Work Date Work Ended	☐ Well Rework ☑ Plugging and Abandonment ☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.
If surface casing is present, an attempt will be made to remove it. If removal of the surface 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 at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
If the surface casing cannot be removed, it will be perforated 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 at least 25 feet bgs to 5 feet bgs.
A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.
If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.
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. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Perforated Interval: 420 - 765 Feet

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 - General Manager		10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS,** i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check ***Notice prior to work*** if the activity has not yet occurred (i.e., is planned). Check ***Report after work*** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check ***Well Rework*** for work that was/will be performed on the well after it has already been in operation as an injection well. Check ***Plugging and Abandonment*** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check ***Conversion to a Non-Injection Well*** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

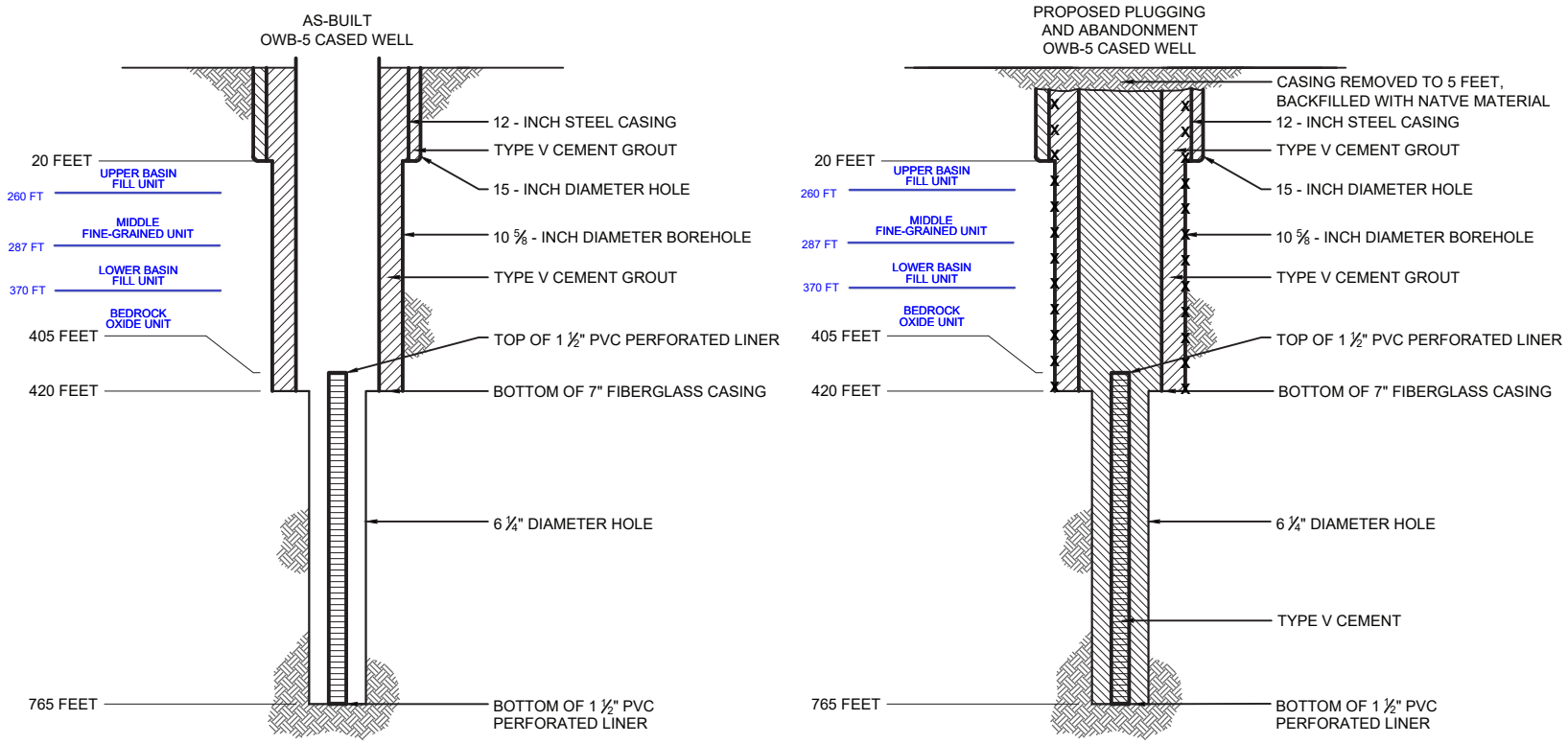
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource 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; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; 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. 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, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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

Attachment F
Financial Assurance (40 CFR § 144.52)
Application for Class III Underground Injection Control Permit

Florence Copper Project
Florence Copper Inc.

October 2019
Revised March 2021

HALEY ALDRICH

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F-2	UIC Closure Cost Summary

List of Exhibits

Exhibit No.	Title
F-1	Florence Copper Demonstration of Financial Capability Letter Dated 12 June 2019
F-2	Estimated Closure Costs of Conoco Shafts
F-3	ISCR Wells to be Plugged and Abandoned at Facility Closure
F-4	Draft Financial Assurance Instrument

Application for Class III Underground Injection Control Permit
Florence Copper Project

Attachment F: Financial Assurance (40 CFR § 144.52)

F.1 INTRODUCTION

This Attachment conveys information describing estimated closure costs as prepared in conjunction with the pending Aquifer Protection Permit (APP) application, and costs to plug and abandon the planned in-situ copper recovery (ISCR) wells in accordance with Underground Injection Control (UIC) Permit requirements.

This Attachment has been prepared in support of an application (Application) by Florence Copper Inc. (Florence Copper) to the U.S. Environmental Protection Agency (USEPA)) for an UIC Class III (Area) Permit (UIC Permit) for the planned ISCR facility at the Florence Copper Project (FCP) in Pinal County, Arizona. With this Application, Florence Copper seeks authorization to construct and operate a commercial-scale ISCR facility at the FCP site. Florence Copper proposes to incorporate the pilot-scale Production Test Facility (PTF), which is currently operating under the UIC Permit, into the planned commercial-scale ISCR facility at the FCP site. This Attachment includes evidence of financial resources in Exhibit F-1.

F.2 DESCRIPTION OF CLOSURE COSTS

Florence Copper has prepared an estimate of closure costs in conjunction with this Application for a UIC Permit to authorize construction and operation of the planned commercial-scale ISCR facility. The closure costs for UIC regulated activities consist of closure of the ISCR wells, tank farm, septic tank, Point of Compliance (POC) wells, post-closure monitoring, and associated miscellaneous costs. A detailed description of the closure cost elements and the table of closure and post-closure cost estimates is provided below. Detailed closure cost items are included in Table F-1, and a summary of the UIC closure cost items are included in Table F-2. Information describing the basis for each of the cost estimate items are provided in the notes included with Table F-1.

F.2.1 ISCR Wells

F.2.1.1 Groundwater Restoration

Groundwater in the ISCR area will be restored to meet Aquifer Water Quality Standards (AWQS) or pre-operational concentrations if those concentrations exceed AWQS. The restoration process includes rinsing the portion of the oxide zone in which injection and recovery has occurred, injecting sodium bicarbonate or other buffering agents as needed to neutralize the groundwater, neutralizing the rinse solution with quicklime or other agents, and evaporating excess water not used for other purposes. The volume of rinse water required to adequately restore the groundwater assumes 6 percent porosity of the Bedrock Oxide Zone and nine pore volumes. Groundwater restoration is assumed to take approximately 24 months to complete for each set of wells when rinsing begins.

F.2.1.2 Abandon ISCR Wells

The approximately 500 remaining ISCR wells will be abandoned in accordance with the provisions of the APP and the Well Abandonment Plan referenced in the UIC Permit. The Well Abandonment Plan includes:

1. The removal of downhole pumps and electrical equipment. The well will then be filled from the bottom to the top of the hole with Type V Portland cement and the collar pipe will be removed to 5 feet below ground surface (bgs). The surface hole will then be backfilled and leveled at grade.
2. All pipelines, electronics, pumps, and other material will be removed off site for reuse, recycling, or landfill disposal.
3. A report will be submitted to the Arizona Department of Environmental Quality (ADEQ) and USEPA demonstrating that closure conditions required by the APP and UIC permits have been met.
4. The two Conoco shafts will be abandoned using a method similar to the well abandonments. Florence Copper plans to convert one of the Conoco shafts into a recovery well to recover ISCR solutions. The other Conoco shaft will be abandoned prior to the commencement of ISCR operations. The estimated costs to abandon the Conoco shafts are included in Exhibit F-2.

F.2.1.3 *Pipelines*

The pipelines connecting the ISCR well area to the processing and water impoundment areas will be removed. The pipelines will be flushed with groundwater and removed for off-site recycling or landfill disposal. The flushed water will be placed in the water impoundment.

F.2.1.4 *Soil and Liner Beneath Piping*

Sampling and analysis will be performed to verify that soil beneath the pipeline containment channel liner has not been impacted by leaks or spills. The liner will be removed for off-site landfill disposal. The pipeline containment channel will be backfilled and leveled out, using on-site soil. The closure cost estimate assumes no impacts to the soil beneath the liner.

F.2.1.5 Tank Farms

The tank farms consist of several aboveground storage tanks located in the ISCR and process plant areas. The tanks will be rinsed clean and moved to a storage area for future use or sold as surplus equipment. Rinse water will flow to the water impoundment. The support materials of the tanks will be checked and disposed of in accordance with applicable state and federal regulations. The liner under the tanks will be removed to an approved off-site disposal facility.

F.2.1.6 Septic Tank Closure

Septic tank closure consists of pumping out and abandoning in place, two 1,000 gallon septic tanks.

F.2.1.7 Miscellaneous Costs

F.2.1.7.1 Daily Monitoring and Observations

Permit conditions require that monitoring wells, the ponds, tank farm, and related facilities be monitored and inspected on a daily basis.

F.2.1.7.2 Quarterly Well Monitoring

The 32 POC and supplemental monitoring wells are required to be sampled on a quarterly basis and the results of the sample analyses reported. A contractor currently performs this work. The closure cost estimate assumes that this work will continue during the entire 48 months of scheduled closure activities.

F.2.1.7.3 Administrative and Miscellaneous Costs, General Project Support Costs

A general cost allowance is included for 48 months of contractor technical support and miscellaneous facility maintenance activities during the closure period. This cost is an allowance for a third party to manage the closure activities on behalf of the permittee. Maintenance activities may include minor facility maintenance such as road grading or minor repairs. Also included in this category are telephone and electrical utility charges (for office facilities), and miscellaneous office and site expenses (postage, office supplies, chemicals, etc.).

F.2.1.8 Post-Closure Monitoring

A groundwater monitoring program will be conducted at all POC and supplemental monitoring wells for 30 years during the post-closure period. Data generated from each monitoring event will be promptly reviewed and the contingency plans will be followed in the event of an exceedance of an alert level or aquifer quality limit. Monitoring for Level 1 and Level 2 parameters are scheduled to occur with the scope and frequencies specified in the APP.

During monitoring events, visual inspections will be performed on surface facilities. Areas to be monitored include signage, fences, locked gates, embankments, capped areas, and storm water control measures. Conditions noted during inspections will be documented.

F.2.1.9 POC and Supplemental Monitoring Wells

At the end of the 30-year post-closure monitoring period, the 32 POC wells and 16 supplemental monitoring wells will be abandoned in accordance with the provisions of the APP (P-101704) and UIC Permit. The well abandonment plan is designed to meet Arizona Department of Water Resources and USEPA requirements. The following provides a general description of the well abandonment procedures:

1. Removal of any downhole pumps and electrical equipment. The well will then be filled from the bottom to the top of the hole with Type V Portland cement and the collar pipe will be removed to 5 feet bgs. The surface hole will then be backfilled and leveled at grade.

2. All pipelines, electronics, pumps, and other material will be removed off site for reuse, recycling, or landfill disposal.
3. A report will be submitted to ADEQ and USEPA demonstrating that conditions established by the APP and UIC permits have been met.

Florence Copper has permitted, constructed, and begun operation of a pilot-scale ISCR facility referred to as the PTF. The PTF is operated under the terms of APP No. P-106360 and UIC Permit No. R9UIC-AZ3-FY11-1. Closure and post-closure cost estimates pertaining to the PTF have previously been submitted to ADEQ and the USEPA.

F.3 PLUGGING AND ABANDONMENT OF ISCR WELLS

Plugging and abandonment of the planned ISCR wells are incorporated into Section 1 of Table F-1 under the heading Abandon ISCR Wells. Florence Copper estimates the maximum number of ISCR wells that will be open during operations to be 462, and this is also the estimated number of wells to be closed at the end of the commercial production period. This number of wells represents the estimated plugging and abandonment burden for ISCR wells at final closure. If Florence Copper determines that more than 462 wells are required to be open during operations, financial assurance for those wells will be provided to the USEPA prior to commencement of drilling. The estimated cost to plug and abandon this number of wells is $7,506,000.

The estimated total cost of closure and post-closure activities for all the UIC regulated activities listed above is $30,793,250 (Table F-1). The list of wells to be plugged and abandoned at facility closure is included in Exhibit F-3.

F.4 EVIDENCE OF FINANCIAL RESOURCES

Exhibit F-1 is a letter dated 12 June 2019 from Stuart McDonald, Chief Financial Officer of Florence Copper, provided in response to information requirements of Attachment F of the UIC Application form. The letter demonstrates that Florence Copper is financially capable of meeting the closure and post-closure costs for all permitted ISCR facilities and associated structures as described in Table F-1 of this Application and discloses the instrument of financial assurance. A draft financial assurance instrument is included in Exhibit F-4.

TABLES

TABLE F-1

FLORENCE COPPER ISCR FACILITY CLOSURE AND POST-CLOSURE COST ESTIMATES

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

OBJECTIVES	DESCRIPTION OF TASKS	UNIT COST	PER UNIT	NO. OF UNITS	ESTIMATED COST[1]
SECTION 1. ISCR WELLS					
1. Groundwater Restoration					
Restore groundwater to meet AWQS/AQL standards, and neutralize/evaporate rinse solution. (Assumed 9 pore volumes for well rinsing, 24 month period) ISCR wells include 205 injection wells, 217 recovery wells, and 40 perimeter wells).	1.Rinse wells. [10]	$3,643,000	Project Total	1	$3,643,000
	2. Operation and maintenance labor (includes rinsing, neutralizing and evaporation for 24 month period).[17]	$1,752,000	Project Total	1	$1,752,000
	3. Quicklime Neutralization[15]	$140	Ton	46,000	$6,440,000
	4. Evaporate impoundment contents using facility evaporators.[11]	$0.27	1,000 Gallons	6,900,000	$1,863,000
	5. Sampling and monitoring during rinsing. Level 1 analysis performed quarterly during 24 month rinsing period. (Assumed system is equipped with a manifold and will require 1 sampling location per event.)[12]	$800	Sampling Event	8	$7,000
	6. Sampling, analysis, and reporting to confirm AWQS/AQLs, Level 2 analysis. (Assumed system is equipped with a manifold and will require 1 sampling location per event.)[13]	$2,000	Sampling Event	1	$2,000
	7. Includes final sampling, analysis, and reporting. Level 1 analysis performed on each well after AWQS/AQL is confirmed.[12]	$800	Well	460	$368,000
	Subtotal				**$14,075,000**
2. Abandon ISCR Wells					
Abandon 462 ISCR wells plus 20 observation wells in accordance with ADWR regulations.[7]	1. File NOIs with ADWR.	$150	Well	482	$73,000
	2. Remove electrical conduit, wellhead assemblies and control boxes.	$500	Well	472	$236,000
	3. Remove pumps.	$1,000	Well	472	$472,000
	4. Remove monuments and cement pads. Cut off casing 5 feet below land surface and backfill hole. (Two crew hours per well.)	$250	Crew Hours	964	$241,000
	5. Dispose of liners, wood, and misc. pipe in off-site landfill (5 cy/well).	$60	Cubic Yards	2,410	$145,000
	6. Type V cement ($450/cy, 0.0073 cy/ft).	$3.30	Lineal Feet	444,810	$1,468,000
	7. Tremie Type V cement from TD to 5 feet below land surface.	$5.00	Lineal Feet	444,810	$2,225,000
	8. Crew and equipment (per diem, backhoe, 10T smeal rig).	$5,000	Well	472	$2,360,000
	9. Mobilization/Demobilization.	$2,000	Project Total	1	$2,000
	10. File Abandonment Completion Reports with ADWR.	$100	Well	472	$48,000
	11. Allowance for unexpected conditions.	$500	Well	472	$236,000
	Subtotal				**$7,506,000**
3. Piping					
Clean and disposal of pipe (20,700 LF, 24-inch diameter).	1.Clean and remove pipes.[2]	$285	Crew Hour	207	$59,000
	2. Dispose of pipe in off-site landfill.[5]	$70	Ton	675	$48,000
	Subtotal				**$107,000**
4. Soil and Liner Beneath Piping					
Perform analysis to verify no impacts to soil beneath liner. (Assumed to be non-hazardous.)	1. Perform initial sampling and analysis (S&A)to verify non-hazardous.(1 sample per 50 feet of trench)[4]	$270	Sample	138	$38,000
	2. Remove liner.[5]	$0.20	Square Foot	414,000	$83,000
	3. Dispose of liner in off-site landfill.[5]	$70	Ton	62	$5,000
	4. Backfill ditch using on-site soil.[6]	$4	Cubic Yards	30,667	$123,000
	Subtotal				**$249,000**
ISCR Wells Total					**$21,937,000**

TABLE F-1

FLORENCE COPPER ISCR FACILITY CLOSURE AND POST-CLOSURE COST ESTIMATES

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

SECTION 2. TANK FARM					
1. Tank Farm					
Empty tanks of contents, rinse and decommission for re-use. Remove concrete and liner.	1. Neutralize contents of acid and sodium hydroxide tanks and place in impoundment for evaporation.	$2,000	Lump sum	1	$2,000
	2. Triple rinse tanks and dispose of rinsate in water impoundment.[14]	$285	Crew Hour	48	$14,000
	3. Relocate tanks.[14]	$285	Crew hour	32	$10,000
	4. Sample concrete.[9]	$300	Sample	20	$6,000
	5. Analyze concrete.[9]	$750	Sample	20	$15,000
	6. Demo and remove concrete liner.[8]	$8.00	Square foot	7,200	$58,000
	7. Transport and disposal concrete at off-site landfill.[3]	$70	Ton	1,000	$70,000
	8. Remove pipe and dispose in off-site landfill.[3]	$70	Ton	8	$1,000
	Subtotal				**$176,000**
2. Soil Beneath Aboveground Storage Tanks and Piping					
Characterize and appropriately dispose, as necessary.	1. Collect and analyze soil samples for characterization.[4]	$270	Sample	14	$4,000
	Subtotal				**$4,000**
Tank Farm Total					**$180,000**
SECTION 3. SEPTIC TANK CLOSURE					
1. Close septic tanks that serve the administration building and SX/EW.	Pump out (2) 1,000-gallon septic tank and close in place.	$12,000	Lump sum	1	**$12,000**
SECTION 4. MISCELLANEOUS COSTS					
1. Daily Monitoring and Observations					
Perform facility inspections and monitoring required by permit.	Included in Operation and maintenance Labor item in Section 1.				$0
2. Quarterly Well Monitoring (POC & Supplemental Wells)					
Perform quarterly monitoring of 32 POC and 16 supplemental wells (during closure).	Monitoring per Level 1 Event.	$36,000	Lump sum	8	$288,000
Total Miscellaneous Costs					**$288,000**
Closure Cost Subtotal					**$22,417,000**
Contingency (15%)					**$3,362,550**
Administrative and Miscellaneous Expenses (10%)[16]					**$2,241,700**
Closure Cost Total					**$28,021,250**
SECTION 5. POST-CLOSURE MONITORING					
1. Initial monitoring					
	1. One biennial Level 2 event.[20]	$82,500	Event	1	$83,000
	2. Seven quarterly Level 1 events.[20]	$34,500	Event	7	$242,000
	Subtotal				**$325,000**
2. Biennial monitoring					
	Fourteen biennial Level 2 events.[20]	$82,500	Event	14	**$1,155,000**
3. Maintenance					
	Maintenance of pumps and wells. Perform visual inspection of surface facilities.[19]	$43,500	Event	15	**$653,000**
4. AQL Exceedance Contingency Per UIC Permit (Part II.H.2.b)					
	1. Notify director and collect verification sample.	$7,000	Event	1	$7,000
	2. Notify director of verification results.	$600	Event	1	$1,000
	3. If verification sample indicates exceedance, submit report to ADEQ and USEPA.	$12,000	Event	1	$12,000
	Subtotal				**$20,000**
Post-Closure Monitoring Total					**$2,153,000**

TABLE F-1

FLORENCE COPPER ISCR FACILITY CLOSURE AND POST-CLOSURE COST ESTIMATES

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

SECTION 6. POC AND SUPPLEMENTAL WELLS					
Abandon 32 POC and 16 supplemental wells in accordance with ADWR and UIC regulations.[4]	1. File NOIs with ADWR.	$150	Well	48	$8,000
	2. Remove electrical conduit, wellhead assemblies and control boxes.	$500	Well	48	$24,000
	3. Remove pumps.	$600	Well	48	$29,000
	4. Remove monuments and cement pads. Cut off casing 5 feet below land surface and backfill hole. (Two crew hours per well.)[18]	$180	Crew Hours	96	$18,000
	5. Dispose of liners, wood, and misc. pipe in off-site landfill (5 cy/well).	$60	Cubic Yards	240	$15,000
	6. Type V cement ($450/cy, 0.0073 cy/ft).	$3.30	Lineal Feet	30,000	$99,000
	7. Tremie Type V cement from TD to 5 feet below land surface.	$5.00	Lineal Feet	30,000	$150,000
	8. Crew and equipment (per diem, backhoe, 10T smeal rig).	$5,000	Well	48	$240,000
	9. Mobilization/Demobilization	$2,000	Lump Sum	1	$2,000
	10. File Abandonment Completion Reports with ADWR.	$100	Well	48	$5,000
	11. Allowance for unexpected conditions.	$500	Well	48	$24,000
	12. Hydro-seed areas around the wells located in the State Mineral lease area.	$3,000	Acre	2	$5,000
POC and Supplemental Wells Total					**$619,000**
POST-CLOSURE TOTAL					**$2,772,000**
TOTAL CLOSURE AND POST-CLOSURE COST					**$30,793,250**

Abbreviations:

% = percent
ADEQ = Arizona Department of Environmental Quality
ADWR = Arizona Department of Water Resources
AQL = aquifer quality limit
AWQS = Aquifer Water Quality Standard
cy = cubic yard
cy/ft = cubic yard per foot
ISCR = in-situ copper recovery
LF = linear foot
NOI = Notice of Intent
POC = Point of Compliance
SX/EW = solvent extraction and electrowinning
UIC = Underground Injection Control
USEPA = U.S. Environmental Protection Agency

TABLE F-1 NOTES:

General Notes: *In preparing this estimate, Haley & Aldrich has relied on information and direction provided by Florence Copper and other parties and, unless otherwise expressly indicated, Haley & Aldrich has made no independent investigation as to the validity, completeness, or accuracy of such information. As with any estimate of this nature, Haley & Aldrich recommends that critical assumptions as well as the basis of estimate, be verified before proceeding with detailed project design or implementation.*

1. The values of this column have been rounded to the nearest thousand.

2. Clean and remove pipes - crew hour assumes (1 equipment operator $75/hr, 1 laborer $60/hr, 1 water pump $150/day). Crew hour includes contractor overhead and profit. Assumes crew can clean and remove 100 LF per hour.

3. Disposal of non-hazardous waste - assumes $70 per ton and includes loading, transport, and disposal. The unit cost is based on one transport vehicle making a round trip from Phoenix to Florence to Apache Junction Landfill and back to Phoenix at a cost of $350 (3.5 hrs x $100 per hr), loading cost of $200 ($10 per ton x 20 tons), and disposal cost of $800 (20 tons x $40 per ton), which totals $1,350 or ≈$70 per ton.

4. Initial Mine Block soil sampling and analysis (S&A) will be performed in areas potentially affected by spills and leaks to verify that contamination does, or does not, exist. Follow-up S&A may be required in order to determine the extent of contamination or effectiveness of remediation efforts. Costs are estimated to be less than $140 per sample for sample collection and less than $130 for sample analysis. Thus, the total S&A cost is $270 per sample.

Parameters for analysis were selected on the basis of their concentrations in solutions processed on site. Sulfate, sodium, and pH were selected because sulfuric acid and sodium hydroxide were used respectively to prepare solutions for injection and to neutralize acidic groundwater pumped from the recovery wells in the mine block to the evaporation pond. Sodium and copper were also selected as indicators of potential contamination because they are expected to have higher concentrations than other metals in the solutions pumped to and from the mine block.

Cost of sampling is estimated to be no more than $140 per sample. That would include costs for actual sample collection, for sample and sampler(s) transportation, for sample preparation, and for report preparation. Cost of analyses were estimated thusly: metals digestion, $41; pH, $22; sulfate, $25; copper, $15; and sodium, $15; for a total cost of $118 ($130 to include a 10% contingency). Thus, the total S&A cost is $270 per sample.

5. Liner Removal costs are based on recent similar projects performed by Haley & Aldrich in 2019.

6. Ponds will be filled to within 3 feet of their crests with process sediments from the facility evaporators and will be covered with 3 feet of fill. [14]

7. Well abandonment unit costs based on recent similar projects performed by Haley & Aldrich in 2019.

8. Concrete demo cost based on recent similar projects performed by Haley & Aldrich in 2019.

9. Sample and analyze concrete - sample unit costs assume not to exceed $750 per sample, analytical cost assume $270 for S&A plus $480 for sample preparation and TCLP analysis.

10. Well rinsing unit costs assume 205 injection wells, 217 recovery wells and 40 perimeter wells. Assuming a mine block of 500 feet long, 500 feet wide, and 640 feet thick; porosity of 8%; well density of 61 wells per block; and 9 pore volumes, the total volume of rinse water is 6,900,000,000 gallons. Pumps' annual operation cost is $3,942/pump; assumes 462 pumps for 2 years. Assumed on-site water source is provided.

11. Evaporation Unit Costs - assumes $0.27/1,000 gallons to evaporate. Evaporation rate of 6,600 gallons per hour and electricity cost of $1.76/hr. Purchase of evaporator not included.

12. Level 1 sampling & analysis unit costs include sampling, lab analysis, and reporting. Costs based on recent similar projects. Lab analysis costs are $59 per sample.

13. Level 2 sampling & analysis unit costs include sampling, lab analysis, and reporting. Costs based on recent similar projects. Lab analysis costs are $910 per sample.

14. Triple rinse tanks - crew hour assumes (1 equipment operator $75/hr, 1 laborer $60/hr, 1 water pump $150/day), crew hour includes contractor overhead and profit.
Assumes crew can triple rinse tanks in 6 days.

15. Quicklime Neutralization assumes 0.0133 pounds of lime per gallon of water to be neutralized, $140/ton lime unit cost.

16. Administrative support and expenses includes utilities and communications cost, miscellaneous equipment and site maintenance, and site management during closure.

17. Operation and maintenance labor crew assumes 3 day laborers $60/hr, 8 hours per day and 1 night laborer $60/hr, 16 hours a day; $2,400/day for 2 years.

18. Assumes 3 laborers at $60/hr each.

19. Operation and maintenance labor crew assumes 2, day-laborers at $60/hr, 8 hours per day ($960/day) working 10 day, with a truck, tools, and parts totaling ($19,400) to conduct inspection, operation, and maintenance of equipment.

20. Monitoring unit costs are based on recent similar projects performed by Haley & Aldrich in 2019.

TABLE F-2
FLORENCE COPPER ISCR FACILITY TOTAL CLOSURE AND POST-CLOSURE COST ESTIMATES
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

CLOSURE ACTIVITIES	ESTIMATED COST
ISCR Wells	$21,937,000
Tank Farm	$180,000
Septic Tank Closure	$12,000
Miscellaneous Costs	$288,000
Closure Cost Subtotal	$22,417,000
Contingency (15%)	$3,362,550
Administrative and Miscellaneous Expenses (10%)	$2,241,700
Closure Cost Total	$28,021,250
POST CLOSURE ACTIVITIES	
Post Closure Monitoring	$2,153,000
POC and Supplemental Wells	$619,000
Post-Closure Total	$2,772,000
TOTAL CLOSURE AND POST-CLOSURE COST	$30,793,250

EXHIBIT F-1

Florence Copper Demonstration of Financial Capability Letter
Dated 12 June 2019

FLORENCE COPPER

FLORENCE COPPER INC.
1575 W. Hunt Highway, Florence, Arizona 85132 USA
florencecopper.com

June 12, 2019

Mrs. Maribeth Greenslade
APP and Drywell Unit – Groundwater Section
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, Arizona 85007

Re: Demonstration of Financial Capability
Florence Copper Project
Significant Amendment Application
Aquifer Protection Permit No. P-101704

Dear Mrs. Greenslade:

The purpose of this letter is to demonstrate to the Arizona Department of Environmental Quality (ADEQ) the capability of Florence Copper Inc. (Florence Copper or Company) to meet the financial requirements of Arizona Administrative Code (A.A.C.) R-18-9-A203 relative to the Company's Site-Wide Individual Aquifer Protection Permit (APP) application for the Commercial Facility ("PTF") proposed to be located on land that Company owns or leases from the State of Arizona under Mineral Lease No. 11-26500.

In accordance with A.A.C. R18-9-A203(B)(1), as the Chief Financial Officer for Florence Copper Inc., I hereby state that the Company is financially capable of meeting the construction, operation, maintenance, closure, and post-closure costs identified pursuant to A.A.C. R18-9-A201(B)(5) and listed in Item 14 of the Individual APP Application Form (which accompanies Florence Copper's application for the Site-Wide Individual APP, and for which this letter is being submitted as Exhibit 4A to Attachment 4).

The Company will be submitting a performance surety bond under R18-9-A203(C)(2) as the mechanism for financial assurance for the APP and in an amount to cover all of the estimated closure and post-closure costs listed in Item 14 and described in Table 3-2 in Attachment 3 of this APP application.

The performance surety bond will meet the requirements of R18-9-A203(C)(2), which are listed below.

a. The company providing the performance bond is listed as an acceptable surety on federal bonds in Circular 570 of the U.S. Department of the Treasury;

b. The bond provides for performance of all the covered items listed in R18-9-A201(B)(5) by the surety, or by payment into a standby trust fund of an amount equal to the penal amount if the permittee fails to perform the required activities;

c. The penal amount of the bond is at least equal to the amount of the cost estimate developed in R18-9-A201(B)(5) if the bond is the only method used to satisfy the requirements of this Section or a pro-rata amount if used with another financial assurance mechanism;

d. The surety bond names the Arizona Department of Environmental Quality as beneficiary;

e. The original surety bond is submitted to the Director;

f. Under the terms of the bond, the surety is liable on the bond obligation when the permittee fails to perform as guaranteed by the bond; and

g. The surety payments under the terms of the bond are deposited directly in the Standby Trust Fund.

The Company will be submitting financial assurance using one of the approved mechanisms in R18-9-A203(C). As noted above, the Company's current intention is to submit a performance surety bond under R18-9-A203(C) as the mechanism for financial assurance for the APP, however the Company may decide to use a letter of credit or other approved mechanism as permitted under R18-9-A203(C). The Company has discussed the financial assurance requirements with several surety providers but has not yet selected the institution that will provide the performance surety bond or other approved mechanism.

FLORENCE COPPER INC.

Stuart McDonald
Chief Financial Officer

EXHIBIT F-2

Estimated Closure Costs of Conoco Shafts

EXHIBIT F-2

FLORENCE COPPER ISCR FACILITY CLOSURE AND POST-CLOSURE COST ESTIMATES

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

OBJECTIVES	DESCRIPTION OF TASKS	UNIT COST	PER UNIT	NO. OF UNITS[1]	ESTIMATED COST[1]
SECTION 1 Conoco Mine Shafts					
1. Abandon Conoco Mine Shaft No. 1 Well					
Abandon Conoco Mine shaft No. 1 well in accordance with ADWR regulations.[2]	1. File NOI with ADWR.	$150	Well	1	$150
	2. Cost of Type V Cement ($450/CY, 0.081 cy/ft)[3]	$37	Lineal Feet	841	$31,000
	3. Installation cost of (tremie) Type V cement from TD to 5 feet below land surface.	$5.00	Lineal Feet	701	$4,000
	4. Crew and equipment (per diem, backhoe, 10T smeal rig)	$10,000	Well	1	$10,000
	5. Mobilization/Demobilization	$2,000	Project Total	1	$2,000
	6. File Abandonment Completion Reports with ADWR.	$100	Well	1	$100
	7. Allowance for unexpected conditions.	$1,000	Well	1	$1,000
	Subtotal				**$49,250**
2. Abandon Conco Mine Shaft No. 2					
Abandon Conoco Mine shaft No. 2 in accordance with ADWR regulations.[2]	1. File NOI with ADWR.	$150	Well	1	$150
	2. Cost of Pea Gravel ($1,447/CY, 0.36 cy/ft)[4]	$515	Lineal Feet	45	$24,000
	3. Cost of Bentonite Seal ($6,480/CY, 0.36 cy/ft)	$2,333	Lineal Feet	10	$24,000
	4. Cost of Type V Cement ($450/CY, 0.36 cy/ft)[3]	$162	Lineal Feet	786	$128,000
	5. Installation cost of (tremie) Type V cement from TD to 5 feet below land surface.	$5.00	Lineal Feet	695	$4,000
	6. Crew and equipment (per diem, backhoe, 10T smeal rig)	$10,000	Well	1	$10,000
	7. File Abandonment Completion Reports with ADWR.	$100	Well	1	$100
	8. Allowance for unexpected conditions.	$4,000	Well	1	$4,000
	Subtotal				**$194,250**
Conoco Mine Shaft Totals					**$243,500**

Abbreviations:

ADWR = Arizona Department of Water Resources
cy = cubic yard
cy/ft = cubic yard per feet
ISCR = in-situ copper recovery
NOI = Notice of Intent

TABLE F-1 NOTES:

General Notes: *In preparing this estimate, Haley & Aldrich has relied on information and direction provided by Florence Copper and other parties and, unless otherwise expressly indicated, Haley & Aldrich has made no independent investigation as to the validity, completeness, or accuracy of such information. As with any estimate of this nature, Haley & Aldrich recommends that critical assumptions as well as the basis of estimate, be verified before proceeding with detailed project design or implementation.*

1. *The values of this column exceeding one thousand have been rounded to the nearest thousand.*
2. *Well abandonment unit costs based on recent similar projects performed by Haley & Aldrich.*
3. *Number of units accounts for estimated 20% material loss.*
4. *Number of units accounts for estimated 50% material loss to tunnel openings.*

EXHIBIT F-3

ISCR Wells to be Plugged and Abandoned at Facility Closure

EXHIBIT F-4

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1287	847978.94	744151.46	96	16
1831	847554.55	744293.03	96	16
1832	847625.27	744293.07	96	16
1833	847625.27	744363.75	96	16
1842	847413.12	744151.60	96	16
1844	847554.54	744222.32	96	16
1845	847483.83	744222.31	96	16
1846	847835.62	744010.20	96	16
1846	847552.81	744010.19	96	16
1846	847554.53	744151.61	96	16
1846	848118.64	744010.05	113	16
1847	847764.93	744080.91	96	16
1847	847482.12	744080.90	96	16
1847	847483.83	744151.61	96	16
1847	848047.95	744080.76	113	16
1853	847625.25	744222.33	96	16
1854	847906.35	744080.93	96	16
1854	847623.54	744080.92	96	16
1854	847625.25	744151.63	96	16
1855	847837.37	744293.05	96	16
1858	847766.67	744293.05	96	16
1859	847695.97	744363.75	96	16
1862	847766.67	744363.75	96	16
1863	847695.96	744293.04	96	16
1865	847695.97	744434.45	96	16
1872	847766.65	744151.63	96	16
1873	847837.35	744151.63	96	16
1876	847766.65	744222.33	96	16
1877	847695.94	744151.62	96	16
1878	847695.95	744222.33	96	16
1880	847908.06	744222.34	96	16
1881	847837.36	744222.34	96	16
1882	847908.06	744151.64	96	16
1885	848116.79	744223.50	88	15
1160	849250.00	744363.61	98	15
1169	849179.29	744434.30	98	15
1257	848260.11	744363.62	88	15
1258	848330.82	744434.33	88	15
1259	848401.53	744505.04	88	15
1265	848330.82	744505.03	88	15
1266	848260.11	744434.32	88	15

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1267	848189.40	744363.61	88	15
1268	848189.40	744292.93	88	15
1269	848118.69	744292.92	88	15
1289	848047.97	744222.18	88	15
1290	848049.66	744151.48	96	15
1295	848542.92	744292.93	97	15
1300	848542.93	744363.64	97	15
1301	848472.22	744292.93	97	15
1302	848330.81	744292.92	97	15
1303	848401.52	744363.63	97	15
1304	848472.23	744434.34	97	15
1310	848472.22	744363.63	97	15
1311	848401.51	744292.92	97	15
1315	848401.52	744434.33	97	15
1316	848330.81	744363.62	97	15
1317	848260.10	744292.91	97	15
1321	848613.63	744292.94	97	15
1342	848542.90	744151.51	97	15
1343	848472.20	744222.21	97	15
1344	848401.49	744151.50	97	15
1345	848401.50	744222.21	97	15
1346	848332.49	744222.20	97	15
1347	848261.77	744151.49	97	15
1354	848261.79	744222.20	97	15
1355	848191.07	744222.19	97	15
1356	848191.07	744151.49	97	15
1357	848120.36	744151.48	97	15
1358	848686.02	744222.23	97	15
1359	848615.31	744222.22	97	15
1360	848544.61	744222.22	97	15
1361	848686.01	744151.52	97	15
1372	848967.15	744292.87	98	15
1373	849037.86	744363.58	98	15
1374	849108.57	744434.29	98	15
1407	849179.27	744292.89	98	15
1407	849108.56	744292.88	98	15
1408	849037.86	744292.88	98	15
1409	849108.57	744363.59	98	15
1418	848967.13	744151.45	98	15
1419	848896.43	744222.15	98	15
1420	848825.72	744151.44	98	15

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1422	849249.96	744222.18	98	15
1422	849108.55	744222.17	98	15
1423	849037.84	744222.16	98	15
1424	848967.14	744222.16	98	15
1425	849179.25	744151.47	98	15
1425	849108.54	744151.46	98	15
1432	848332.47	744151.49	97	15
1433	848615.30	744151.51	97	15
1434	848473.89	744151.50	97	15
1435	848756.71	744151.43	97	15
1436	849037.83	744151.45	98	15
1437	848896.42	744151.44	98	15
1789	847977.10	744434.47	88	15
1790	847977.11	744505.18	88	15
1791	847906.40	744434.47	88	15
1792	847835.70	744505.17	88	15
1793	847906.41	744575.88	88	15
1794	847977.11	744575.88	88	15
1795	847906.40	744505.17	88	15
1796	847906.41	744646.58	88	15
1797	847835.70	744575.87	88	15
1798	847977.12	744717.29	88	15
1799	847977.12	744646.59	88	15
1800	847977.10	744363.77	88	15
1801	848189.23	744434.50	88	15
1802	848259.94	744505.21	88	15
1803	848330.65	744575.93	88	15
1806	848259.94	744575.91	88	15
1807	848189.23	744505.20	88	15
1808	848118.52	744434.49	88	15
1809	848118.53	744505.20	88	15
1810	848189.24	744575.91	88	15
1811	848259.95	744646.63	88	15
1814	848189.24	744646.61	88	15
1815	848118.53	744575.90	88	15
1816	848047.82	744505.19	88	15
1817	848047.81	744293.10	88	15
1818	848118.52	744363.79	88	15
1819	848047.81	744363.78	88	15
1820	848047.82	744434.49	88	15
1821	848048.71	744575.02	88	15

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1822	848118.54	744646.61	88	15
1823	848047.83	744646.60	88	15
1826	848118.55	744788.03	88	15
1827	848047.84	744788.01	88	15
1828	848189.25	744717.33	88	15
1829	848118.54	744717.31	88	15
1830	848047.84	744717.31	88	15
1846	848401.45	744010.06	97	15
1846	848684.27	744009.98	106	15
1846	848967.09	744010.00	98	15
1847	848613.58	744080.69	97	15
1847	848330.76	744080.77	97	15
1847	848896.40	744080.71	98	15
1854	848472.18	744080.79	97	15
1854	848189.37	744080.78	97	15
1854	848755.00	744080.71	106	15
1854	849037.82	744080.74	98	15
1856	847906.39	744363.76	88	15
1857	847837.38	744363.76	96	15
1860	847766.68	744434.46	96	15
1861	847835.69	744434.46	88	15
1864	847764.99	744505.16	88	15
1866	847977.09	744293.06	88	15
1867	847908.08	744293.06	96	15
1879	847978.77	744222.35	96	15
1127	849674.24	744505.05	90	14
1128	849744.94	744505.05	90	14
1134	849532.83	744505.04	90	14
1135	849603.54	744575.75	90	14
1136	849674.25	744646.46	90	14
1138	849674.24	744575.75	90	14
1139	849603.53	744505.04	90	14
1144	849391.42	744505.03	90	14
1145	849462.13	744575.74	90	14
1146	849532.84	744646.45	90	14
1147	849603.55	744717.16	90	14
1149	849603.54	744646.45	90	14
1150	849532.83	744575.74	90	14
1151	849462.12	744505.03	90	14
1155	849532.84	744717.15	90	14
1156	849462.13	744646.44	90	14

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1157	849391.42	744575.73	90	14
1158	849603.52	744434.33	90	14
1158	849320.70	744434.31	90	14
1158	849886.34	744434.35	99	14
1158	849320.71	744505.02	90	14
1160	849532.82	744363.63	90	14
1160	849815.64	744363.65	99	14
1160	849250.01	744505.02	90	14
1161	849320.72	744575.73	90	14
1162	849391.43	744646.44	90	14
1163	849462.14	744717.15	90	14
1164	849532.85	744787.86	90	14
1165	849462.14	744787.85	90	14
1166	849391.43	744717.14	90	14
1167	849320.72	744646.43	90	14
1168	849250.01	744575.72	90	14
1169	849744.93	744434.34	90	14
1169	849462.11	744434.32	90	14
1169	849179.30	744505.01	90	14
1225	849744.95	744575.76	90	14
1254	848684.39	744858.60	80	14
1255	848755.11	744858.64	80	14
1260	848472.24	744575.75	80	14
1261	848542.95	744646.46	80	14
1262	848542.95	744717.16	80	14
1263	848472.24	744646.45	80	14
1264	848401.53	744575.74	80	14
1270	848684.37	744787.89	80	14
1271	848613.66	744787.87	80	14
1272	848613.66	744717.17	80	14
1296	848613.63	744363.64	89	14
1297	848684.34	744434.35	89	14
1298	848684.35	744505.06	89	14
1299	848613.64	744434.35	89	14
1305	848542.94	744505.05	89	14
1306	848613.65	744575.76	89	14
1307	848684.35	744575.76	89	14
1308	848613.64	744505.05	89	14
1309	848542.93	744434.34	89	14
1312	848613.65	744646.46	89	14
1313	848542.94	744575.75	89	14

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1314	848472.23	744505.04	89	14
1318	848684.36	744717.17	89	14
1319	848684.36	744646.47	89	14
1320	848684.33	744292.94	89	14
1322	848684.34	744363.65	89	14
1323	848755.06	744505.07	89	14
1324	848755.05	744292.99	89	14
1325	848755.05	744363.66	89	14
1326	848755.06	744434.37	89	14
1327	848755.96	744574.90	89	14
1328	848755.07	744646.49	89	14
1329	848755.09	744787.90	89	14
1330	848755.09	744717.20	89	14
1362	848755.03	744222.24	89	14
1375	849108.59	744505.00	89	14
1376	849037.87	744434.29	89	14
1377	848967.16	744363.58	89	14
1378	848896.45	744292.87	89	14
1379	848825.75	744363.57	89	14
1380	848896.46	744434.28	89	14
1381	848967.17	744504.99	89	14
1382	849037.89	744575.70	89	14
1383	849037.87	744504.99	89	14
1384	848967.16	744434.28	89	14
1385	848896.45	744363.57	89	14
1386	848825.74	744292.86	89	14
1387	848825.76	744504.98	89	14
1388	848896.47	744575.69	89	14
1390	848967.17	744575.69	89	14
1391	848896.46	744504.98	89	14
1392	848825.75	744434.27	89	14
1393	848825.77	744646.39	89	14
1394	848896.49	744717.10	89	14
1396	848896.47	744646.39	89	14
1397	848825.76	744575.68	89	14
1399	848825.77	744717.09	89	14
1400	848825.79	744787.80	89	14
1421	848825.73	744222.15	89	14
1462	848967.19	744646.40	89	14
1684	848542.98	744858.59	80	14
1685	848613.69	744929.30	80	14

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1688	848613.70	745000.01	80	14
1689	848542.99	744929.30	80	14
1690	848472.28	744858.59	80	14
1691	848330.86	744858.58	80	14
1692	848401.58	744929.29	80	14
1693	848472.29	745000.00	80	14
1694	848543.00	745070.71	80	14
1698	848542.99	745000.00	80	14
1699	848472.28	744929.29	80	14
1700	848401.56	744858.58	80	14
1701	848260.16	744929.28	80	14
1702	848330.88	744999.99	80	14
1703	848401.59	745070.70	80	14
1704	848472.30	745141.41	80	14
1708	848472.29	745070.70	80	14
1709	848401.58	744999.99	80	14
1710	848330.86	744929.28	80	14
1711	848260.15	744858.57	80	14
1714	848401.59	745141.40	80	14
1715	848330.88	745070.69	80	14
1716	848260.16	744999.98	80	14
1717	848189.45	744929.27	80	14
1723	848613.69	744858.60	80	14
1724	848684.40	744929.31	80	14
1731	848472.25	744717.17	80	14
1732	848472.25	744787.87	80	14
1733	848401.54	744717.15	80	14
1734	848401.55	744787.87	80	14
1735	848330.84	744787.85	80	14
1736	848542.96	744787.88	80	14
1787	848189.27	744858.77	80	14
1788	848118.56	744858.76	80	14
1804	848401.36	744646.64	80	14
1805	848330.65	744646.63	80	14
1812	848330.66	744717.34	80	14
1813	848259.95	744717.33	80	14
1824	848259.96	744788.04	80	14
1825	848189.25	744788.03	80	14
1099	849462.16	744858.57	81	13
1114	849391.45	744858.56	81	13
1123	849108.59	744575.70	81	13

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1170	849180.19	744574.84	81	13
1171	849250.02	744646.43	81	13
1172	849179.31	744646.42	81	13
1173	849391.44	744787.85	81	13
1174	849320.73	744787.84	81	13
1175	849320.73	744717.14	81	13
1176	849250.02	744717.13	81	13
1256	848755.11	744929.32	72	13
1273	848825.81	744929.22	72	13
1274	848896.52	744999.93	72	13
1275	848896.52	745070.63	72	13
1276	848825.81	744999.92	72	13
1363	848967.21	744858.52	81	13
1364	849037.92	744929.23	81	13
1365	848967.22	744929.23	81	13
1366	848896.51	744858.52	81	13
1367	848967.22	744999.93	81	13
1368	848896.51	744929.22	81	13
1369	848825.80	744858.51	81	13
1370	849108.62	744858.53	81	13
1371	849037.92	744858.53	81	13
1389	849037.89	744646.40	81	13
1395	848967.19	744717.10	81	13
1398	848896.49	744787.80	81	13
1401	849108.61	744787.82	81	13
1402	849037.90	744787.81	81	13
1403	848967.20	744787.81	81	13
1404	849108.60	744717.11	81	13
1405	849037.90	744717.11	81	13
1406	849108.60	744646.41	81	13
1416	849179.32	744787.83	81	13
1417	849179.32	744717.13	81	13
1486	848967.23	745070.64	72	13
1487	849037.94	745141.35	72	13
1488	849037.94	745212.05	72	13
1489	848967.23	745141.34	72	13
1491	849108.65	745212.06	72	13
1508	849108.63	744999.94	81	13
1509	849108.64	745070.65	81	13
1510	849037.93	744999.94	81	13
1511	849108.64	745141.35	81	13

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1512	849037.93	745070.64	81	13
1513	849108.63	744929.24	81	13
1514	849391.46	744929.27	81	13
1519	849320.76	744999.97	81	13
1529	849320.75	744929.26	81	13
1535	849250.05	744999.96	81	13
1536	849250.06	745070.67	81	13
1545	849179.35	745070.66	81	13
1546	849320.75	744858.59	81	13
1547	849179.34	744858.57	81	13
1548	849250.04	744858.57	81	13
1549	849250.05	744929.26	81	13
1550	849179.34	744929.25	81	13
1551	849179.35	744999.96	81	13
1552	849180.24	745140.49	81	13
1559	849250.03	744787.84	81	13
1681	848684.44	745424.25	72	13
1682	848755.16	745424.29	72	13
1683	848755.16	745494.97	72	13
1686	848684.40	745000.01	72	13
1687	848684.41	745070.72	72	13
1695	848613.71	745141.42	72	13
1696	848684.41	745141.42	72	13
1697	848613.70	745070.71	72	13
1705	848543.01	745212.12	72	13
1706	848613.71	745212.12	72	13
1707	848543.00	745141.41	72	13
1712	848543.01	745282.82	72	13
1713	848472.30	745212.11	72	13
1718	848684.43	745353.54	72	13
1719	848613.72	745353.53	72	13
1720	848684.42	745282.83	72	13
1721	848613.72	745282.83	72	13
1722	848684.42	745212.13	72	13
1725	848755.12	745070.73	72	13
1726	848755.12	745000.03	72	13
1727	848756.01	745140.56	72	13
1728	848755.13	745212.14	72	13
1729	848755.14	745353.55	72	13
1730	848755.14	745282.85	72	13
1740	848896.56	745424.18	72	13

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1741	848825.86	745494.88	72	13
1745	848825.85	745424.17	72	13
1750	848825.82	745070.63	72	13
1751	848896.53	745141.34	72	13
1752	848967.24	745212.05	72	13
1753	848825.83	745212.04	72	13
1754	848896.54	745282.75	72	13
1755	848967.24	745282.75	72	13
1756	848896.53	745212.04	72	13
1757	848825.82	745141.33	72	13
1758	848896.54	745353.45	72	13
1759	848825.83	745282.74	72	13
1760	848825.84	745353.45	72	13
1763	848967.25	745353.47	72	13
1764	849037.95	745282.77	72	13
976	850169.27	745494.98	74	12
978	850310.67	745353.58	74	12
978	850310.67	745424.28	74	12
978	850239.97	745424.28	74	12
979	850239.98	745494.99	74	12
1092	849674.27	744858.59	82	12
1093	849744.98	744929.30	82	12
1094	849815.69	745000.01	82	12
1095	849815.70	745070.72	82	12
1096	849744.99	745000.01	82	12
1097	849674.28	744929.30	82	12
1098	849603.57	744858.59	82	12
1104	849815.70	745141.42	82	12
1105	849744.99	745070.71	82	12
1106	849674.28	745000.00	82	12
1107	849603.57	744929.29	82	12
1108	849532.86	744858.57	82	12
1115	849886.38	744858.60	82	12
1115	849815.68	744858.60	82	12
1116	849744.98	744858.60	82	12
1117	849815.69	744929.31	82	12
1118	849886.41	745070.73	82	12
1119	850027.82	744929.34	82	12
1119	849957.11	744929.33	82	12
1119	849886.40	744929.32	82	12
1120	849886.41	745000.03	82	12

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1121	849887.31	745140.55	82	12
1122	849886.42	745212.14	74	12
1137	849744.95	744646.46	82	12
1148	849674.25	744717.16	82	12
1154	849603.55	744787.86	82	12
1177	849957.08	744787.90	82	12
1177	849815.67	744787.89	82	12
1178	849744.96	744787.87	82	12
1179	849674.26	744787.87	82	12
1180	849886.36	744717.17	82	12
1180	849815.66	744717.17	82	12
1181	849744.96	744717.17	82	12
1185	850098.56	745424.27	74	12
1186	850169.27	745424.28	74	12
1192	849957.11	745070.73	82	12
1193	850169.25	745141.46	74	12
1193	850098.53	745141.45	74	12
1193	850027.82	745141.44	74	12
1198	850027.79	745000.01	82	12
1198	849957.10	745000.02	82	12
1199	849957.12	745212.14	74	12
1200	850027.83	745282.85	74	12
1201	850098.53	745282.85	74	12
1202	850169.22	745212.14	74	12
1202	850027.82	745212.14	74	12
1203	849957.11	745141.43	74	12
1204	850027.83	745353.55	74	12
1205	849957.12	745282.84	74	12
1206	850239.96	745353.57	74	12
1207	850169.25	745353.56	74	12
1208	850098.55	745353.56	74	12
1210	850239.96	745282.87	74	12
1210	850169.25	745282.86	74	12
1226	849815.65	744575.76	82	12
1230	849815.66	744646.47	82	12
1884	850525.41	746486.71	49	11
1883	850591.17	746626.45	41	11
221	849886.56	746626.28	40	11
245	850098.66	746555.58	40	11
246	850169.37	746626.29	40	11
247	850240.08	746697.00	40	11

EXHIBIT F-4

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
248	850098.67	746626.29	40	11
249	850027.96	746555.58	40	11
250	849957.26	746626.28	40	11
251	850098.67	746696.99	40	11
252	850027.96	746626.28	40	11
253	849957.25	746555.57	40	11
254	850522.88	746838.31	32	11
254	850240.08	746838.38	40	11
254	849957.26	746696.98	40	11
255	850240.07	746555.59	40	11
256	850169.37	746555.59	40	11
257	850240.08	746626.30	40	11
258	850593.61	746555.60	49	11
258	850522.91	746555.62	49	11
259	850452.21	746626.32	40	11
260	850381.51	746697.02	40	11
261	850452.21	746555.64	40	11
262	850310.79	746555.63	40	11
263	850381.49	746555.63	40	11
264	850381.51	746626.32	40	11
265	850310.79	746626.31	40	11

EXHIBIT F-4

Draft Financial Assurance Instrument

PERFORMANCE BOND

Date bond executed: [DATE, 2021]

Effective date: [DATE, 2021]

Principal: Florence Copper Inc.

1575 W. Hunt Highway

Florence, AZ 85132

Type of organization: Corporation

State of incorporation: Nevada

Surety: Lexon Insurance Company

10002 Shelbyville Road, Suite 100

Louisville, KY 40223

Class III In-Situ Production of Copper

EPA Permit No. R9UIC-AZ3-FY19-1

Florence Copper Project

1575 West Hunt Highway

Florence, AZ 85132

Total penal sum of bond: $30,793,250.

Surety's bond number: [DRAFT BOND#]

Know All Persons By These Presents, That We, the Principal and Surety hereto are firmly bound to the U.S. Environmental Protection Agency (hereinafter called EPA), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally; provided that, where the Sureties are corporations acting as co-sureties, we, the Sureties, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum

only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be the full amount of the penal sum.

Whereas said Principal is required, under the Underground Injection Control Regulations, as amended, to have a permit or comply with provisions to operate under rule for each injection well identified above, and

Whereas said Principal is required to provide financial assurance for plugging and abandonment as a condition of the permit or approval to operate under rule, and

Whereas said Principal shall establish a standby trust fund as is required when a surety bond is used to provide such financial assurance.

Now, Therefore, the conditions of this obligation are such that if the Principal shall faithfully perform plugging and abandonment, whenever required to do so, of each injection well for which this bond guarantees plugging and abandonment, in accordance with the plugging and abandonment plan and other requirements of the permit or provisions for operating under rule and other requirements of the permit or provisions for operating under rule as may be amended, pursuant to all applicable laws, statutes, rules and regulations, as such laws, statutes, rules, and regulations may be amended,

Or, if the Principal shall provide alternate financial assurance as specified in subpart F of 40 CFR part 144, and obtain the EPA Regional Administrator's written approval of such assurance, within 90 days after the date of notice of cancellation is received by both the Principal and the EPA Regional Administrator(s) from the Surety, then this obligation shall be null and void, otherwise it is to remain in full force and effect.

The Surety shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above.

Upon notification by an EPA Regional Administrator that the Principal has been found in violation of the plugging and abandonment requirements of 40 CFR part 144, for an injection well which this bond guarantees performances of plugging and abandonment, the Surety shall either perform plugging and abandonment in accordance with the plugging and abandonment plan and other permit requirements or provisions for operating under rule and other requirements or place the amount for plugging and abandonment into a standby trust fund as directed by the EPA Regional Administrator.

Upon notification by an EPA Regional Administrator that the Principal has failed to provide alternate financial assurance as specified in subpart F of 40 CFR part 144, and obtain written approval of such assurance from the EPA Regional Administrator(s) during the 90 days following receipt by both the Principal and the EPA Regional Administrator(s) of a notice of cancellation of the bond, the Surety shall place funds in the amount guaranteed for the injection well(s) into the standby trust fund as directed by the EPA Regional Administrator.

The Surety hereby waive(s) notification of amendments to plugging and abandonment plans, permits, applicable laws, statutes, rules, and regulations and agrees that no such amendment shall in any way alleviate its (their) obligation on this bond.

The liability of the Surety shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety hereunder exceed the amount of said penal sum.

The Surety may cancel the bond by sending notice by certified mail to the owner or operator and to the EPA Regional Administrator(s) for the Region(s) in which the injection well(s) is (are) located, provided, however, that cancellation shall not occur during the 120 days beginning on the date of receipt of the notice of cancellation by both the Principal and the EPA Regional Administrator(s), as evidenced by the return receipts.

The principal may terminate this bond by sending written notice to the Surety, provided, however, that no such notice shall become effective until the Surety receive(s) written authorization for termination of the bond by the EPA Regional Administrator(s) of the EPA Region(s) in which the bonded injection well(s) is {are) located.

In Witness Whereof, The Principal and Surety have executed this Performance Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and Surety.

PRINCIPAL

BY: _____

Name: Bryce Hamming

Title: Chief Financial Office

Corporate Seal:

CORPORATE SURETY

Lexon Insurance Company

10002 Shelbyville Road, Suite 100

Louisville, KY 40223

State of incorporation: Texas

Liability Limit: $

By: _____

Name and Title: Theresa Pickerell, Attorney-In-Fact

Corporate Seal:

Attachment G
Site Security and Manifest Requirements (Commercial Wells Only)
Application for Class III Underground Injection Control Permit

Florence Copper Project
Florence Copper Inc.

October 2019

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List of Exhibits i

G.1 INTRODUCTION 1

G.2 SECURITY PLAN 1

List of Exhibits

Exhibit No.	**Title**
G-1	Security Plan

Application for Class III Underground Injection Control Permit
Florence Copper Project

Attachment G: Site Security and Manifest Requirements (Commercial Wells Only)

G.1 INTRODUCTION

This Attachment describes the site security program.

This Attachment has been prepared in support of an application (Application) by Florence Copper, Inc. (Florence Copper) to the U.S. Environmental Protection Agency (USEPA) for an Underground Injection Control Class III (Area) Permit (UIC Permit) for the planned In-Situ Copper Recovery (ISCR) facility at the Florence Copper Project (FCP) in Pinal County, Arizona. With this Application, Florence Copper seeks authorization to construct and operate a commercial-scale ISCR facility at the FCP site. Florence Copper proposes to incorporate the pilot-scale Production Test Facility, which is currently operating under UIC Permit R9UIC-AZ3-FY11-1, into the planned commercial-scale ISCR facility at the FCP site.

Manifest requirements are not applicable to the FCP because the project will generate all fluids for injection on site and no fluids requiring manifest will be received from sources off site.

G.2 SECURITY PLAN

Florence Copper has retained a contract security company to provide security for the FCP site. The FCP site is secured with fencing, closed circuit cameras at key locations, and dedicated security patrol. The security program responsibilities, procedures, communication, and emergency response policies are described in the site security plan included as Exhibit G-1.

EXHIBIT G-1

Security Plan

FLORENCE COPPER INC.
1575 W. Hunt Highway, Florence, Arizona 85132 USA
florencecopper.com

SITE SECURITY PLAN – Operations & Procedures

July 2019

The **purpose** of the following site security plan to provide an overview of Florence Copper's property wide security practices and requirements of the system and describe the controls in place or planned**,** responsibilities and expected behavior of all individuals who access the system.

START OF SHIFT

1. ENTERING/EXITING MAIN BUILDING (AFTER HOURS)

- If administrative office staff is off site and the main building is secured, you will need to take the following steps to disarm and to arm the security alarm system:
    - Entering – Unlock main front door.
    - Go to alarm panel located immediately to your left; punch in the alarm code.
    - Press the "off" key (The alarm should read that it is disarmed)
    - Exiting – Go to the alarm panel; punch in the alarm code.
    - Press the "away" key
    - Exit the main door and lock them!
- In the case that the alarm panel does not set after entering the code, you will see the "FAULT" on the display; this will relay the issue (i.e. door ajar in the building).
- Fix the "FAULT" issue and retry the code.
- If the alarm has an error or is set off, the alarm company will call the security cell phone.
- Provide the dispatcher with the designated password and report that the area is Code 4, if all is clear, or report the issue of the alarm.

2. START YOUR SECURITY PATROL

When conducting security patrol, the company-issued hardhat; security vest will be required when out of the vehicle. In addition, steel-toed boots shall always be worn at all times around site by the FC designated safety patrol employee.

- A complete inspection of each point of interest, including all gates, is required at least once in a 12-hour shift.

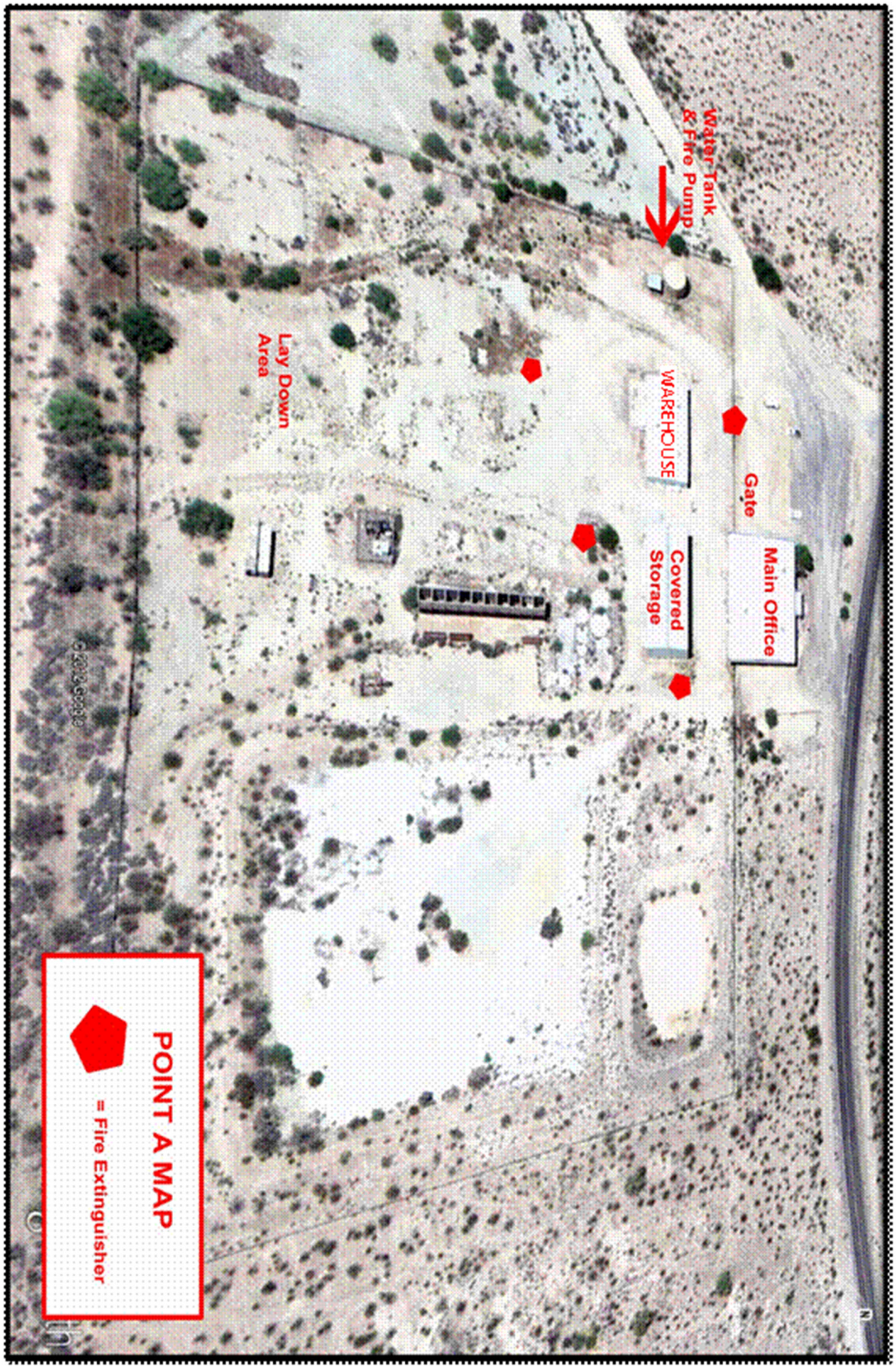
- At least two patrols are conducted in each area during the rest of the shift. These patrols are done randomly with the officer returning to the PTF Control Room when completed. The Administrative Office Area, , PTF Plant, PTF Wellfield and the critical cultural resource areas identified in this plan are vital, so they are the most important items to secure.
- Do not sit in the vehicle idling. Return to the office building after conducting patrols.
- Question anyone on the site that may not be a part of the copper extraction operation or identified as staff in a professional manner. *If the person or persons in question do not cooperate, you are to contact the shift supervisor.*
- Document all your activity in the Site Security Daily Activity Report.
- Drive at a safe speed *and never drive in an area which may compromise the vehicle or your safety.* *<u>Site speed limits must be observed.</u>*
- 911 & Shift Supervisor– should be contacted for emergency situations. Call Shift Supervisor first during other situations.

Definition:

Key points are areas within the Florence Copper Site that are divided into six location points A- F and a perimeter/gate check known as Location Point G. Each Key point has its own unique structure in which you are to provide a complete and thorough inspection.

LOCATION POINT A

Point of Interest	Description	Objective	Hazard
Main Building	Florence Copper Staff Offices	Physical Check	No
Electrical Transformer	Enclosed on three side	Check for Tampering	Yes
Water Tank	Supplies water	Check for Tampering or Over-flowing	No
Fire Pump	Works in conjunction with the water tank	Visual Check of Control Panel	No
Covered Storage	Open Storage Area	Physical Patrol Check	No
Warehouse	Secured Storage	Physical Patrol Check	No
Lay Down Area	Staging Area for Equipment	Physical Patrol Check	No
Fire Hydrants X 4	Standard Hydrant	Check for Tampering and Leaks	No


Main Office
Gate
Covered Storage
WAREHOUSE
Water Tank & Fire Pump
Lay Down Area
POINT A MAP
= Fire Extinguisher

LOCATION POINT B

Point of Interest	Description	Objective	Hazard
Geology House	Secure Building	Physical Check and Patrol	No
GH Storage 1	Secure Building	Physical Check and Patrol	No
GH Storage 2	Secure Building	Physical Check and Patrol	No
GH Core Storage	Secure Building	Secured after hours	No
Yellow Gate	Two Triangular Swivel Gates	Should remained Locked	No