



PRIOR TO CONSTRUCTION

Selection / Exploration

- Secure right of entry permit (*federal, state, county, city, utilities*)
- Authority for exploration:
 - Geologic Field Operation Plan (state)
 - National Environmental Policy Act (NEPA) process (federal)
- Cultural Resources Clearance

“The US has the second longest mine development times in the world, at almost 29 years on average from first discovery to first production.”

— S&P Global — Mine development times:
The US in perspective, June 2024

Land Use/Zoning

- Mineral Lease (*state/federal lands*)
- i** Notice of intent to operate
- i** Plan of operations
- Mine reclamation plan
- Land Surface Reclamation Cost and Financial Assurance
- Floodplain use permit
- Riparian Habitat Mitigation Plan (*Pima County*)
- Special Land Use Permit for non-mining facilities (*e.g. administrative building at a mine site on state lands*)

Water

- Secure water or establish water rights
- i** Individual aquifer protection permit/s
- Closure strategy/plan, cost and financial assurance
- Sewer collection system permit
- Clean Water Act (CWA) Section 208 consistency review
- Water quality certification, CWA, Section 401
- Stormwater discharges from industrial activities, CWA 402, AZPDES permit
- Water and/or wastewater facilities construction approval
- i** Reclaimed water permit
- CWA section 404 permit (*if impacting a WOTUS*)
- Notice of intention to drill
- Withdrawal and use of groundwater permit
- Dam Safety Permit for Tailings Dam
- Safe Drinking Water Act (SDWA) Underground Injection Control Permit

Environmental

- i** National Environmental Policy Act (*federal lands*)
 - Environmental assessment and/or environmental impact assessment
 - Public hearing and comment period
- Endangered Species Act, section 7 consultation (*federal lands*)
- Native plant surveys (*state/federal lands*)
- Flood control permits (*federal lands*)
- i** Air quality permit
 - Risk management plan review
 - Notice of intent to clear land
 - EPA Hazardous Waste Identification (*if required*)
 - EPA Hazardous Chemical Inventory Reporting
 - Spill Prevention Control and Countermeasures Plan



These are the areas where public input is required.

CONSTRUCTION

- Mine Safety and Health Administration (MSHA) Form 7000-51, Mine ID Request
- MSHA 2000-7 Legal Identification Report
- Radio station license, wireless communication
- Building code inspection

Explosives & Fuel

- Bureau of Alcohol, Tobacco and Firearms Explosives License or Permit
- Explosives Magazine Construction Notice
- EPA Hazardous Chemical Inventory Reporting
- State aboveground and underground fuel storage registration
- State underground fuel storage tank installation inspection

COMMISSIONING

- Approval to Operate:
 - Clean Air Act
 - Clean Water Act (*if applicable*)
 - Safe Drinking Water Act (*if applicable*)
- Site inspection

PRODUCTION

- Routine inspections from city, county, state and federal agencies for environmental, health and safety
- Routine monitoring and reporting to city, state and federal agencies

Cultural Resources

- i** Arizona Antiquities Act compliance (*state lands*)
 - Plan of operation review
 - Cultural resource survey
 - Consult with the Arizona State Museum and Tribes
 - Mitigation Plan
 - Reporting to the Arizona State Museum for approval and curation"
- i** National Historic Preservation Act, Section 106 Compliance (*federal lands*)
 - Consultation and Treatment Plan
 - Cultural Resource Surveys/Studies
 - State and Tribal Historic Preservation Office Concurrence
 - National Register of Historic Places (NRHP) Eligibility Determination
 - Effect Determination Report
 - Memorandum of Agreement or Programmatic Agreement
 - Mitigation Plan
 - Advisory Council on Historic Preservation (ACHP) Involvement (*if necessary*)

RECLAMATION

- Reclamation Plan Implementation under State Mine Inspector oversight
- Post closure monitoring for 30 years under state and federal agencies