

August 2, 2021

Sarah Elizabeth Martinez
c/o James Copeland, District Ranger, Nogales Ranger District
Coronado National Forest
300 W. Congress St., Tucson, AZ 85701

RE: SRQ-IMERYYS Amended Plan of Operations and Proposed Expansion

Dear Ms. Martinez,

Rosemont Copper Company ("Rosemont") hereby submits comments on the draft environmental assessment ("EA") for the proposed IMERYYS Carbonates NA amended Plan of Operations for its proposed project located in Township 18 South, Range 15 East, Sections 11, 12, and 14.

Based on Figure 2 (Affected Claims Map) of the draft EA, it appears that the IMERYYS plan of operations boundary encroaches on unpatented claims owned by Rosemont and another third party. Specifically, Rosemont owns the Hope 226A, Hope 227A, Hope 228A, Hope 229A, Hope 230, HV16, H-173B, H-174-B, H-175B H-176B, H-183A, H-192A, and H-199A claims (AMC Nos. 330914-330918, 390077, 331309 - 330312, 313677, 313683, and 313689) located in Sections 11, 12, and 14 of the relevant Township and Range. These claims were located in 1994 and predate the IMERYYS claims by well over 23 years. In addition, the Blue Jay No. 1 lode claim (AMC No. 329411) owned by Sahuarita Mining 1986, Ltd., that was located in 1994 in Sections 11 and 12 of the relevant township and range is also encroached upon. The Blue Jay No. 1 claim (which is a part of the Blue Jay Mine) has been intermittently mined for over 100 years.

Unfortunately, a copy of the proposed plan amendment has not been made available in order for Rosemont (or others) to discern what specific exploration or mining activities are proposed on claims held by Rosemont and other third parties. Rosemont hereby requests a copy of the amended plan of operations and contends that all encroachments must either be resolved or the IMERYYS plan boundary must be appropriately adjusted prior to issuance of the final EA, any decision notice or mine plan approval.

Sincerely,


Matthew Bingham (Aug 2, 2021 13:48 PDT)

Matt Bingham
Director, Legal

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