

CONTACT INFORMATION
Mining Records Curator
Arizona Geological Survey
416 W. Congress St., Suite 100
Tucson, Arizona 85701
602-771-1601
http://www.azgs.az.gov
inquiries@azgs.az.gov

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70 MC LETTER



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Fife Symington, Governor

Edward Z. Fox, Director

CERTIFIED MAIL
Return Receipt Requested

Date: July 8, 1993 REF: WP923

Jerry Neidfeldt, President Tombstone Development Co. P.O.Box 1445 Grand Island, Nebraska 68803

RE: Tombstone Development Company Inc.-Site Inspection and Technical Assistance Meeting Summary; Inventory No. 102806; Cochise County.

Dear Mr. Niedfeldt:

TECHNICAL ASSISTANCE MEETING SUMMARY

The Arizona Department of Environmental Quality ("ADEQ"), conducted an inspection on June 22, 1993 at the Tombstone Development Company Mine Site ("Facility"), near Tombstone, Arizona. During the facility inspection, violations of the Arizona Revised Statutes (A.R.S.) and Arizona Administrative Code (A.A.C.) were observed.

I. MONITORING AND SAMPLING

A.R.S. § 49-263 The Facility shall establish that the previously permitted mining and leaching sites are environmentally safe.

CORRECTIVE ACTION

Within ninety (90) days of receipt of this letter, the following actions shall be carried out:

1. A sampling line shall be established across the old pregnant and barren solution pond site in areas that showed the higher signs of contamination from previous sampling. The depth of the sampling shall be established by on-site investigation of cross sections of the soils present. Photographs of these profiles shall be submitted to indicate the reasoning of the choices made. A sufficient number of samples to

indicate the condition of the area shall be collected. The samples shall be tested for the items listed in the attached Exhibit A.

- 2. A pre-approved sampling plan shall be developed and completed to indicate that the old washed pile of tailings is environmentally safe. The samples shall be tested for the items listed in the attached exhibit A.
- 3. Monitor wells shall be drilled which will establish the flow gradient of the underground water, the character of the water in the previously polluted areas, and the presence of pollutants for any future mining operations known at this time. These monitoring wells shall be developed to become a part of The samples shall be tested for the items listed the Facilities future monitoring and testing procedures. in the attached Exhibit A. Once the Aquifer has been characterized, the facility shall develop a regular monitoring and reporting scheme for ADEQ review and approval. This schedule shall be carried out on the regular basis specified until the permits are completed.
- 4. Following the development and testing of these wells, a comprehensive report shall be developed, within 30 days, correlating the sites monitor wells and the outside well data. This report shall indicate the character and condition of the Aquifer and any pollution that may have been caused at the site or any adjacent locations. This evaluation shall establish the existing conditions prior to the start of any new activity. A compliance schedule describing any remediation necessary shall be developed and presented with this report.
- 5. Within 60 days of the receipt of this letter, a watershed control map shall be developed to indicate the runoff controls at the site. These controls shall be consistent with the Aquifer Protection Permit (APP) Needs as they are known at this time. An Operations and Maintenance ("O & M") manual shall be developed to describe the necessary maintenance required to keep the watershed controls in proper operating condition. This map and the corresponding O & M Manual shall be updated as facilities are changed at the site.

II. PERMITS

Within 30 days the facility shall contact Don Bell of ADEQ's Water Pollution Compliance Staff to arrange for pre application meetings for the following Permits: { what has been ?

1. NPDES Permit-Clean Water Act Section 402.

2. Aquifer Protection Permit- A.A.C. Title 18, Chapter 9.

3. UŜT Closure Permits-A.R.S. § 49-1008

4. Solid Waste Closure Permits-A.R.S. § 49-762

III. SAMPLE ASSAY LABORATORY SITES

A.A.C. R18-8-261 and R18-8-262. Laboratory chemicals and process chemicals shall be handled, stored, transported and disposed of in a proper manner consistent with the above Arizona Revised Environmental Statutes and Title 27 of the Arizona Mining Statutes.

CORRECTIVE ACTION

Laboratory and process chemicals kept on site shall be stored in properly vented rooms under lock and key. Chemicals which are out of date or which are no longer desired, shall be disposed of in the properly described manner, with a proper manifest to a properly designated disposal area.

IV. UNDERGROUND STORAGE TANKS (UST) SITES

A.R.S. § 49-1002 Petroleum product storage tanks located on site have not been properly registered with the State of Arizona and have not been properly constructed or installed according to the requirements of the state.

CORRECTIVE ACTION

Within 30 days of receipt of this letter, the petroleum products contained in the tanks shall be characterized by a state approved vendor and disposed of in the proper manor for the products located in each of the tanks. These actions shall be properly manifested while being carried out. Disposal shall be at an approved facility.

Within 30 days the Facility will make arrangements for a pre-permit application meeting with the ADEQ UST Section to develop the necessary closure requirements and remediation. Remediation shall include both above and below ground remediation.

V. SOLID WASTE SITES

A.A.C. R18-8-702 (proposed rule). Waste tires were observed piled in an unregistered landfill at the Facility.

CORRECTIVE ACTIONS:

Within 90 days of receipt of this letter, the facility will contact the ADEQ Solid Waste Unit and file with the Director the required one time notice of commencement of burial of mining industry off road tires as required by the above rule (copy of proposed rule is attached). A.A.C. R18-8-701.5. defines "Mining

industry off road motor vehicle waste tires" as an off road waste tire which is greater than three feet in outside diameter which was used in mining. This notification will identify the location of the burial cell. Since the burial cells shall become a part of the Aquifer Protection Permit (APP), I am requesting that these engineering APP requirements be completed and reviewed by APP Technical Review before complete burial is carried out. Tires which do not fit the description of a waste mining tire shall be deposited in a proper Waste Tire Collection Site (WTCS).

ATTACHMENTS:

Copy of Proposed Chapter 8, Waste Tires, Article 7. Directory of Arizona Waste Tire Collection Sites.

A.R.S. § 49-762 The landfill was not registered with the Department as of October 1, 1992, as per part K of A.R.S. 49-762. The Facility is therefore deemed to be a new facility. As a new facility according to A.R.S. 762.B., the Facility is required to have a facility plan prior to operation, and or closure.

CORRECTIVE ACTION: Attached is a set of guidelines for closure of the landfill. Within thirty (30) days, the facility will contact Dan Zeller of the Solid Waste Unit (602-207-4118) and develop a closure meeting plan to accommodate the solid Waste Unit, and which will meet the requirements of the APP Application which will later be submitted. At a minimum, a description of events shall be included with the APP applications. This closure plan will be submitted and approved by ADEQ prior to any action on site.

Before instigation of action to cover and cap the area, the Attorney General's Office shall be contacted to determine the disposition of the evidence in their case concerning the domestic dumping which occurred on the site. Contact Investigator Andy Rubalcava of the Attorney General's Office at 602-542-4853.

Old equipment, containers, and other materials not contained in landfills shall be consolidated in centralized equipment or materials yards in a manner which will not be or become an environmental nuisance. Buildings and facilities which are conducive to rodent and insect infestation problems shall be remediated.

Within (90) days the Facility will research and develop a waste stream guideline which will describe how to provide the proper disposal of items that have been left on site. These items (both solid waste and hazardous waste) include but are not limited to:

Empty cyanide barrels Waste plastic pipe and liner materials Residues and sludges left in the heap leach area. Cyanide contaminated materials not leached or washed on site. Laboratory and process chemicals Septic wastes contaminated with laboratory chemicals. Used or contaminated petroleum products Old equipment and used containers. Building materials no longer useful to the facility.

This waste stream information shall be left in the O & M Manuals as guidelines for future operators of the property.

ATTACHMENTS:

Waste Management Landfill Closure Guidelines-1992 Copy of the Solid Waste Statutes-Chapter 4.

VI. COMPLIANCE SCHEDULES

Within ninety (90) days the Facility shall develop a compliance schedule that will describe the completion of all the items needed to complete the remediation of the site. This schedule shall include at a minimum:

- 1. A monitoring and reporting schedule for the active portions of the facility.
- 2. A schedule for the permitting activities that are known as of the schedule delivery date. The Facility shall be responsible for the time for their participation and not for the Departments reviews.
- 3. A schedule for the planned cleanup and remediation actions to be carried out.
- 4. The schedules shall describe the development, and time elements needed, to plan and execute each of the compliance items through completion and inspection.

The Facility is required to submit documentation of compliance with each of the referenced rules by the date specified for each.

Please be advised that the violations listed above, which the Facility agreed to resolve, must be addressed within that time frame. Any violations which are not addressed within that time frame, will be incorporated into a Consent Order.

ADEQ is accountable to the citizens of Arizona and mandated by law to ensure that facilities are in compliance with all applicable statutes and rules. ADEQ must be assured that compliance has been achieved. Therefore, any submittal required by this letter must include the following statement and must be signed by a person authorized to act on behalf of the company or empowered to make decisions on behalf of the company to certify to the ADEQ their knowledge of and accountability for the submittal:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you require further assistance, please contact me at (602) 207 4613.

Sincerely,

Donald Bell

Compliance Officer

Water Pollution Compliance Unit

Office of Water Quality

DGB:arv

B:\TOMBSTON\TA.30

cc:

Peggy Guichard-Watters, Manager, OWQ Compliance Section Andy Rendes, Southern Regional Office Dave Anderson, APP Hydrology Unit

Jeff Ende, Mining APP Dave Zeller, OWP, Solid Waste Section Jim Brisco, Jabba, Inc. Roger Kennett, PRP, APP section Cochise County Health Department Andy Rubalcava, Investigator, Attorney General's office.

DISTRIBUTION LIST

Jerry Neidfeldt, President Tombstone Development Co. P.O.Box 1445 Grand Island, Nebraska 68803

Excellon Resources Inc. c/o Douglas Mckenzie, VP Suite #200-20 Aidelaide St. East Toronto Ontario, Canada M5C 2T6

Jim Brisco, Representative Excellon Resources Inc. c/o Jabba Inc. 2100 N. Wilmot Tucson, Arizona 85712 (602)721-1375

> Tombstone Development Company Technical assistance letter Exhibit A - Required Samples

Old Heap Leach and Old Washed Tailings

Old Heap Ecach and Old Heap			
EPA 1312 (1)	AGP / ANP (2)	Ag (Silver)	
As (Arsenic)	Ba (Barium)	Be (Beryllium)	
Cd (Cadmium)	Cr (Chromium)	Cu (Copper)	
Hg (Mercury)	Ni (Nickel)	Pb (Lead)	
Se (Selenium)	Sb (Antimony)	Tl (Thallium)	
	Total Cyanide	WAD Cyanide	
Zn (Zinc)	10.00		

(1) Synthetic Precipitation Leaching Procedure

(2) Acid Generating Potential / Acid Neutralization Potential

Monitor Wells

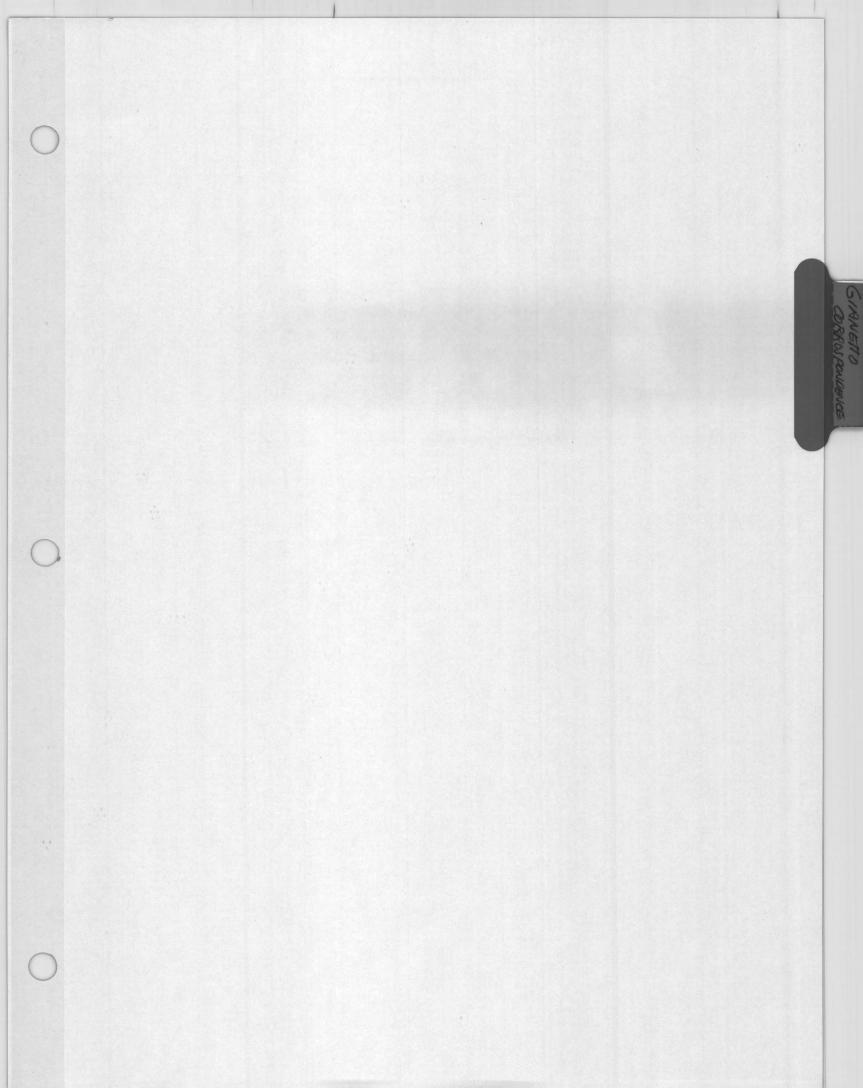
Note: All monitor well metals should be analyzed as Total metals (e.g. total Silver, total Arsenic, etc.)

TKN (1)	Total petroleum hydrocarbons (2)	Alkalinity, Total
Alkalinity, Phenol	Chloride	Conductivity
Fluoride	Hardness	NO ₂ /NO ₃ , Total
рН	Sulfate	TDS (3)
Ag (Silver)	As (Arsenic)	Ba (Barium)
Be (Beryllium)	Cd (Cadmium)	Ca (Calcium)
Cr (Chromium)	Cu (Copper)	Fe (Iron)
K (Potassium)	Hg (Mercury)	Mg (Magnesium)
Mn (Manganese)	Na (Sodium)	Ni (Nickel)
Pb (Lead)	Se (Selenium)	Sb (Antimony)
Tl (Thallium)	Zn (Zinc)	Total Cyanide
WAD Cyanide		

(1) Total Kjeldahl Nitrogen

(2) BLS 181

(3) Total dissolved solids



I Day 17, cc

LAW OFFICES OF

LEO N. SMITH

CASAS ADOBES PROFESSIONAL PLAZA 6985 NORTH ORACLE ROAD TUCSON, ARIZONA 85704

FAX (602) 797-9770

TELEPHONE (602) 797-0777

review d
-11

November 18, 1993

Bisbee Salvage and Equipment Company Attn: Bill Gianetto P.O. Box 4517 Bisbee, AZ 85603

Dear Mr. Gianetto:

This office represents Tombstone Development Company ("TDC") and as I advised to you in our telephone conference this morning, TDC must move to complete the clean up of its properties at Tombstone.

You indicated to me that you might be able to move the three large tanks and perhaps the small tanks as well by giving the same to someone willing to haul them off the property. As to the remainder of the equipment (consisting of the conveyor and belts at the upper end and the carbon plant within the fenced area at the lower end), you indicated that you had no immediate prospects for selling or removing the same.

Please be advised that as to any of the equipment remaining on the property beyond December 31, 1993, TDC must move the same into a fenced in equipment storage area at the property or make other arrangements for the disposal thereof. In such event, TDC will look to you for reimbursement of all costs of constructing such a storage area and moving the equipment, including all costs of cleaning up the equipment if required by the Arizona Department of Environmental Quality ("ADEQ") to do so.

As an alternative, TDC would consider leasing a storage area to you until you are able to sell and move the equipment. If this were to be done, such a lease would have to be executed by December 15, 1993. The storage area and the equipment therein would have to be secured within a fenced area and the area would have to meet standards set by the ADEQ for such storage areas by no later than January 31, 1994.

CONCO REVIEWED J.A.B.

 $\,$ TDC hopes that we can work together to solve this problem and that TDC will not be required to handle the matter for you and charge you the costs.

Please keep TDC advised as to your plans and progress.

Very Truly Yours

Leo N. Smith

LNS:es

xc: Jerome Neidfelt

James Briscoe

Tombstone Development Company

P.O. BOX 1445

TELEPHONE 308/382-7480

GRAND ISLAND, NEBRASKA 68802

July 15th, 1993

Bisbee Salvage and Equipment Company P. O. Box 4517 Bisbee, Arizona 85603

Attention: Bill Gianetto

Dear Bill:

I have been wanting to thank you for sending us a list of equipment that you purchased at the auction site on Tombstone Development property. Frank and I enjoyed the visit with you in Tombstone and want to thank you again for making the trip there to meet with us.

I mentioned during this meeting that it has become necessary for removal of this equipment, but I did not know at that time the schedule we would have to meet. We have now been informed by the Department of Environmental Quality that all this excess equipment must be removed within 90 days, starting July 15th, 1993.

Please understand that this is not a requirement of Tombstone Development Company, but of the Department of Environmental Quality.

We therefore must request that we live within this time frame since financial penalty can be assessed for failure to do so.

7/21) 93 REVIEWED J.A.B.

Very truly yours,

Tombstone Development Company
By: Jerome Niedfelt, President

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JN/ap

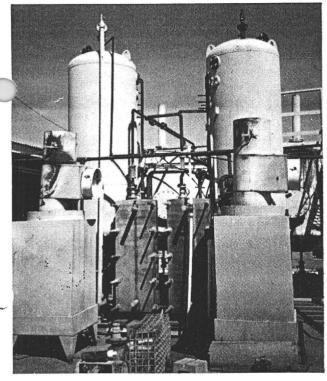
AUCTION

SILVER AND GOLD PROCESSING EQUIPMENT

COWACHIN MINES, LTD. has commissioned HENDRIX & ASSOCIATES AUCTIONS to sell at AUCTION their surplus inventory of SILVER AND GOLD PROCESSING EQUIPMENT. Equipment has been properly maintained and was in use at time Cowachin Mines opted to change their processing method.

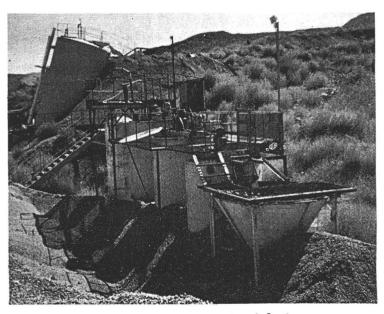
10:04 A.M., THURSDAY, DECEMBER 8, 1988 In HISTORIC TOMBSTONE, ARIZONA

(Half Mile Southeast of the City of Tombstone on the Old Bisbee Highway off Allen Street)



Carbon Stripper

INSPECTION DAYS: DECEMBER 6 AND 7



Carbon In Pulp/Carbon In Leach System

TERMS OF PAYMENT: Cash, Cashier's Check, Business Check if accompanied by Bank Letter. All sales are final. Equipment is sold AS-IS, WHERE-IS with no warranty or guaranteeds implied or stated.

HENDRIX & ASSOCIATES, INC.

• AUCTIONEERS • APPRAISERS • LIQUIDATORS • CONSULTANTS
RON HENDRIX, (806) 794-9649, 5518 77th St., Lubbock, Texas 79424, TX Lic. # 6040
FOR INFORMATION: P.O. Box 370, Tombstone, Arizona, 85638, (602) 457-2282 or FAX (602) 457-3020

AUCTION INCLUDES:

- Clear Water Carbon Adsorbtion System: (6) 2-Ton Pressurized Towers, Rated Flow is 700-800 GPM; One 2-Ton Open Tower
- Carbon In Pulp/Carbon in Leach System: (3) 7'x9' Agitating Tanks with Lightnin Agitation and Fully Equipped with Sandpiper Transfer Pumps, Air Lines and Screens

20,000 Lbs. of West States 521G Carbon (Bagged)

Carbon Stripper: (2) One-Ton Stripping Vessels Equipped with (2) Sioux D-1000 Instant Hot Water Heaters (1,000,000 BTUH) and (2) Transfer Super Chargers plus 800-Gal. Preg and 800-Gal. Barren Tanks, 10 HP Viking Positive Displacement Pump, Stainless Steel Valves And Flanges

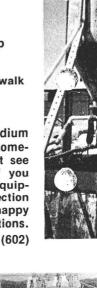
Zinc Precip Feeder

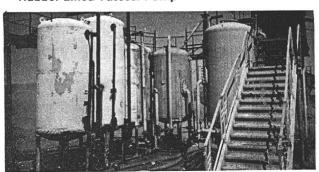
- Filter Press (30 Sw. Ft.) with 2 HP Teel Pump and Venturi Vacuum System also with 2 HP Teel Pump
- Carbon Acid Wash Tank
- **Heat Reactivators**
- **Holding Tank**
- Carbon Transfer Equipment
- 4'x24' Trommel w/Gear Reducer and 10 HP Motor
- Atkins Twin 48" Classifier (Sand Screw w/Electrical and 75 HP Elec. Motor and Catwalk
- Feeder: 15-Ton Bin w/Grizzley, Underflow Belt w/10 HP Motor and Gear Reducer, 18 x 100 Convevor with Belts and Pulleys
- (3) Settling Tanks, Two 20,000-Gal. and One 12,000-Gal.
- **Bolt Bin and Contents**
- (4) Gate Valves
- (2) Butterfly Valves
- Jaeger Pump, 6"x6"
- Centrifical Pump w/Motor
- Gorman Repp Pump, 3"x3"
- Worthington Pump, 4"x3"
- Denver 3"x3" Rubber Lined Pump w/Westinghouse 20 HP Motor
- ITT 11/4" x 2" Pump w/2 HP Motor
- UMI 1 1/4" x 1" Centrifical Pump w/ 2 HP Motor
- Jet 1" x 3/4" Pump w/ 1/2 HP Motor
- 3/4"x3/4" Centrifical Pump, 3/4 **HP Motor**
- Morse 87 to 1 Gear Reducer, Model 103K
- Krebbs Cyclone Separator, Model 202, 8"x6" Rated
- Gardner-Denver Compressor, 250
- Jaeger Pump w/10 HP Motor
- Pump w/15 HP Motor
- G.E. 25 HP Electric Motor
- U.S. 7½ HP Electric Motor
- (4) Assorted Electric Motors
- U.S. 40 HP Electric Motor
- U.S. 30 HP Motor
- Pallets of Electrical Switch Boxes
- **Assorted Flanges and Fittings**
- (6) Gate Valves, 6X
- (3) Gate Valves, 3X
- Pinch Valves

- (4) Plug Valves
- 6" Check Valves
- 4" Cross T
- Assorted Victraulic Fittings and Clamps
- Ingersoll-Rand 5"x3" Pump w/15 **HP Electric Motor**
- Door-Oliver 6"x4" Rubber Lined Pump
- Falk Gear Reducer, 48 to 1
- U.S. 71/2 HP Elec. Motor, 3-Ph, 440
- Electric Motor, 10 HP
- G.E. 50 HP Electric Motor Wilfley 6"x10" Sand Pump
- Dorrco Pump, Double Daiphram, 10"x6" w/Electric Motor
- Spool of S/S Wire, Approx. 3000'
- **Assorted Pump Parts**
- Bauer Hydra-Sieve, Mod. 552F Denver SRL 3"x3" Sand Pump w/ 10 HP Electric Motor
- **Assorted Valves**
- 2KW DC Generator
- Allen Sherman Pump
- **Krebb Cyclones**
- 50 HP U.S. Electric Motor w/6"x4" **Rubber Lined Vacseal Pump**

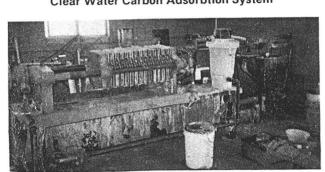
- 4"x6" Vacseal Pump w/30 HP Motor
- 3"x3" Dual Pump w/71/2 HP Delco Motor
- 60' Thickner Unit w/Winn Smith Gear Reducer
- **Assorted Hoses & Pulleys**
- 60" Eriz Screen
- 48" Swelo Screen
- 71/2 HP Submergible Mud Pump
- 30 HP Self Priming Pump
- Misc. Iron and PVC
- 900-Gal: Mixing Tank w/Catwalk and Accessories
- Other Items

Whether you are a small or medium size operation - there will be something for you at this sale. Must see to appreciate. Please call us if you would like to come see the equipment before the designated inspection days. Our personnel will be happy to answer any and all questions. Phone: (602) 457-2282 or FAX (602) 457-3020, Tombstone, Arizona

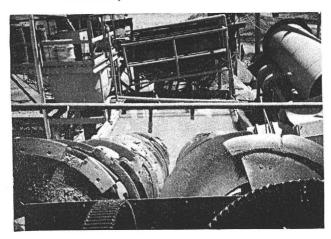


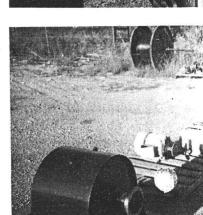




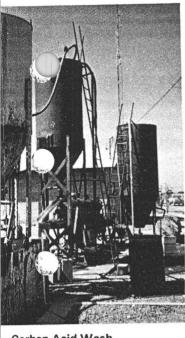


Zinc Precip Feeder and Filter Press



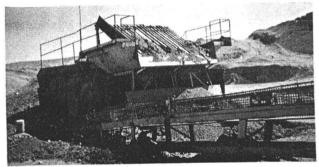


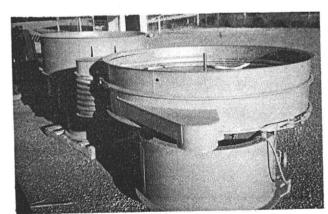


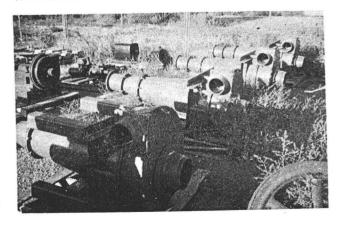


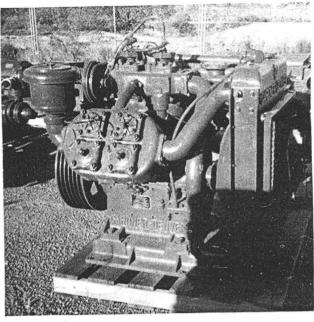


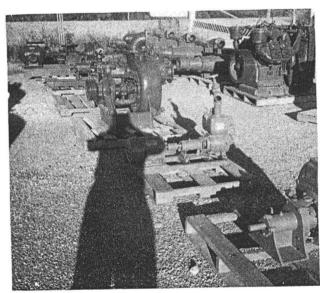


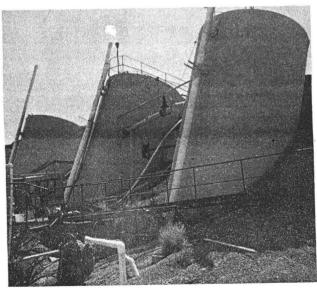












Settling Tanks





AUCTION

SILVER AND GOLD PROCESSING EQUIPMENT



THURS., DEC. 8, 1988
Tombstone, Arizona

Half-Mile SE of City at PBR Minerals (Old Bisbee Hwy. off Allen St.)

FOR INFORMATION: (602) 457-2282 or FAX (602) 457-3020 Tombstone, Arizona

AIRLINES (Serving Tucson, Arizona) American 1-800-433-7300
Delta 1-800-221-1212
Braniff 1-800 BRANIFF
Eastern 1-800-327-8376
American West 1-800-247-5692
Aero Mex 1-800-237-6639
RENT-A-CAR (Serving Tucson, Arizona)
Avis 1-800-331-1212
Budget 1-800-527-0700
Hertz 1-800-654-3131
LODGING (Tombstone, Arizona)
Lookout Lodge
(Best Western) 602-457-2223
Tombstone Motel 602-457-3478
Lariat Motel 602-457-2272
Adobe Lodge

Return Address: P.O. BOX 5133 LUBBOCK, TEXAS 79417

AUCTION

Silver & Gold Processing Equipment

Starting at 10:04 A.M. On THURSDAY, DECEMBER 8, 1988

IN HISTORIC
TOMBSTONE, ARIZONA
Half-Mile Southeast of the City at PBR
Minerals (Old Bisbee Highway off
Allen St.)

INSPECTION DAYS: DECEMBER 6 AND 7, 1988

HENDRIX & ASSOCIATES, INC. 12/8 /88 PBR AUCTION TOMBSTONE, ARIZONA

L.ot	# Description		Price
1	Bolt bin and Contents	æ	
2	4 Gate Valves 4x	\$	
3	2 Butterfly Valves 2x	\$	
4	Jaeger Pump 6''x 6''	\$	
5	Centrifigal Pump with Motor	\$	
6	Gormann Rupp Pump 3''x 3''	\$	
7	Worthington Pump 4''x 3''	\$	
8	3''x 3'' Denver Pump w/Westinghouse 20HP motr	\$	
9	ITT 1 1/4''X 2'' Pump w/2 HP Motor	\$	ä
10	UMI 1 1/4''x 1''Centrifigal pump w/2 HP Motr	\$	
1. 1.	Jet 1''x 3/4'' Pump/1/2 HP Motor	æ	
12	3/4 X 3/4 Centrifigal Pump w/3/4 HP Motor	\$	
13	Morse 87 to 1 gear reducer Model 1.03K	\$	
14	Krebs Cyclone Seperator Md. 202 8x6 rated	\$	
15	Krebs Cyclone Seperator Md. 202 8x6 rated	\$	
16	Krobs Cyclone Seperator Md. 202 8x6 rated	\$	
17	Krebs Cyclone Seperator Md. 202 8x6 rated	\$	
18	Gardner-Denver Compressor 250CFM	\$	
19	Jaeger Pump w/ 10HP Motor	\$	
20	Pump w/ 15 HP Motor	\$	*

21	Mud Pump		Ψ
22	GE 25 HP Electrie Motor		\$
23	US 7 1/2 HP Electrie Motor		\$
24	4 Assorted Electric Motors		\$
25	US 40 HP Electric Motor		\$
26	US 30 HP Electric Motor		\$
27	Pallet of Electric Switch Boxes		\$
28	Pallet of Electric Switch Boxes		\$
29	Pallet of Assorted Flanges and Switcher	es	\$
30	6 Gate Valves	6x	\$
31	3 Gate Valves	3×	\$
32	Pinch Valve		\$
33	Assorted Elbows and Tees		\$
34	4 Plug Valves	4×	\$
35	6'' Check Valve		\$
36	4'' Cross Tee		\$
37	Assorted Fittings		\$
38	Assorted Victaulic Fittings and Clamp	s	\$
39	Ingersol-Rand 5x3 Pump w/15 HP Electr	ic Mtr.	\$
40	Dorr-Oliver 6x4 Rubberlined Pump		\$
41	Falk Gear Reducer 48 to 1		\$
42	US 7 1/2 HP Elec. Mtr. 3 Phase 440 h	1etric	\$
43	Electric Motor 10 HP		\$
44	GE 50 HP Electric Motor		\$
45	Wilfly 6 x 10 Sand Pump		\$
46	Dorrco Double Diaphram 10X6 Pump w/e	lec mtr.	\$
47	Spool of Stainless Steel Wire approx	, 3000'	\$

	48	Assorted Pump Parts	\$
	49	Bauer Hydra-sieve Model 552F	\$
	50	Denver SRL 3X3 Sand Pump w/ 10HP Elec. Motor	\$
	51	Pallet of Assorted Valves	\$
	52	2 KW DC Generator	\$
	53	Allen Sherman Pump	\$
	54	Mise VACUUM DUMP	æ
	-55-	-Misc VOID	T
	56	Misc	\$
	57	Misc	\$
	58	Misc	\$
	59	Misc	\$
)	60	Misc	T
	61	Misc	\$
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	63	Misc	\$
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-	72	-Misc-	\$
	73	Misc	\$
	74	Misc	\$
	75	60 'Thickner Unit	\$
	76	15 Ton Bin Feeder w/10HP Mtr./Clevnd Gear Red	\$
	77	100 ' Belt w/Motor and Gear Reducer	\$
	78	4 X 16 Trommel w/Gear Reducer & 10 HP Motor	\$
	79	Twin 48' 'Atkins Sandscrew w/75HP Mtr/Catwalk	\$
	80	US 50HP Elec Mtr. w/6x4 Vacseal Pump-Rubber Line	2 £
	81	Clear Water Carbon Adsorbtion Unit (6) 2-Ton	
		Pressure Towers, (1) 2-Ton Open Tower, Catwall	k.
8	31 A	and 75 HP Century Pump(3X4), and Electrical	\$
	82	2- 20,000 gallon and 1- 12,000 gallon Settling	g
		Tanks w/ (4) 3/4 X 3/4 Transfer Pumps	\$
	83	Carbon in Pulp/ Carbon in Leach Unit-includes	
		(3) 7 X 9 Agitation Tanks w/Lightnin Agitato	rs
		3''Stainless Steel Sandpiper Pump, 2''Transfe	r
		Pump, (1) Cone Hopper w/Electrical and Catwal	k\$
	84	4 X 6 Vacseal Pump w/30HP Motor	\$
	85	Small Pump	\$
9	86	8,000 Pounds of West States 5216 Carbon 8000	> C\$
	87	3 X3 Dual Prime Pump w/7 1/2HP Delco Motor	\$
	88	Misc	\$
	89	Screens	\$
	90	Screens	\$

91 1 Ton Carbon Heat Pressure Stripper w/ D-1000 1,000,000 BTU Hr. Sloux Instant Hot Water Heater, Tranter Super Charger, Stainless Steel Valves and Fittings, (1) 1-Ton Carbon Stripping Vessel, (1) 800 gallon Strip Solution Tank, (1) 400 Gallon Strip Solution Tank, (1) Viking \$ Positive Replacement Pump 92 1 Ton Carbon Heat Pressure Stripper w/ D-1000 1,000,000 BTU Hr. Sioux Instant Hot Water Heater, Tranter Super Charger, Stainless Steel Valves and Fittings, (1) 1-Ton Carbon Stripping Vessel, (1) 800 gallon Strip Solution Tank, (1) 400 Gallon Strip Solution Tank, (1) Viking \$ Positive Replacement Pump £ 93 Precipatation Unit 94 Acid Wash Unit 95 Heat Reactivator w/ Feeder and Storage Tank and Transfer Pump and Tank 96 Pallet of Hose

0 97 12,000 Pounds of West States 521G Carbon

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description Bolt BIN + Contents	AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 6"X6" JAEGFR Fump
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description H - GATE VAIVES	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description Punp (1)/ 135700
Price	HENDRIX & ASSOCIATES
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 2 - By Har Sty Value	AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 3"X3" GORMAN REPP
Price	PriceThank You

**BUYER FX

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 4"X3" WORTHINGTON	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 14 X 1" CFNTRIFICAL LIME PUMP With 2HP Motor
- Pump	USAR 21412 1116 1610
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 3" X3" Rubber LINED DENVIW	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 1"X 34" Tet Pump
PUMP W/20HP Westinghouse motor	with 1/2 H? Motie
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 14" X2" CENTRIFICAL ITT	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 3/4" X 3/4" CENTRICAL Dank with
Pump w/ 2HP Model	34 hP MCTON
PriceThank You	PriceThank You

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description MORSE GEAR REDUCED MD 103 K RAtio 87 to 1	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description KRebs Cyclone Separation Md 202 Lated 8" to 6"
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description
Md202 RATEd 8"X6"	Md 202 latel 8" to 6"
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424
Description Keebs Cyclone SQUARHON	Compassor 250 CEM
PriceThenk You	PriceThank You

****BUYER***

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description JAEGER PUM (10 Hr) Motory	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description GF. 25 HP FIRETURE HIGH 1940
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description Pump / Junit 15 HP Motor	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 4.5. 7 HP F(Fig. 14-10-4)
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424
Description MUD PUMP	Description H ASSORTE FIETHER MICHUES
PriceThank You	PriceThank You

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 3 - Gole Usivas	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 4 - PLUG VAIUES
PriceThank You	Price
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 PINCH VAIVE	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 6" CHCK VAILE
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424
Description LOT of ASSOCIED Flows +	Price
PriceThank You	Thank You Seeman

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description LOT of ASSORTED Filing S	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description DORR -OLIVEID 6"X4" Rubber Lines Pump
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description LOT of ASSORTED VICTOLIC FITTINGS + CLAMPS	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description FAIK GEAD REDUCER RATIO 48 +0
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description U.S. 7/2 HP EIECTIAC Modes
Description FN6FKSOL RAND 5"X3" Pump WHY ISHP ELECTRIC Motors Price	PriceThank You

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description / OHP ELECTRY MOTOW	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description PORCO 10" X 6" Double / Dirt philipm Play Just Finds Met
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 6.E. 50 HP ELECTRIC MOTOR	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 3000 5000 0 + 5/S WIRE
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description WIFLEY 6"X10" SAND PUMP	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description LoT of ASSOCIACE Pump Parts
PriceThank You	PriceThank You

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424
Description BAYER HYDRA-SIEVE	Description 2 KW DC GENERATON
Md 552 F	
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424
DENVER SRL 3"X3"	Description ALLEN SHEKINDEN
SAND Pump /wifl 10 HP ELECTRIC Motor	- Pump
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424
Description_ POWET of ASSORCL	Description VACUUM Pump
UALUPS	
Price	PriceThank You
Thank You	1.1

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description STON B.N Feeder N 10 HP M/2 Clembred Gen Redmen	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description Twin 48" Atkins Samosciew W/75HP MONE /CATIVALK
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 100' BUT W/ MUTTA ~ GEAZ Reduces	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description US SOHP ELC MTR W WYY VACSIAL Pump (Rubba Lived).
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424
Description 4x 16 Tromme L W/GERR Redney & 10 HP MOTOR	Description Clear WATER ADSORDITION Unit (6) 2 Ton Presson Towns (1) 2 TON OPEN TOWN GTWALK
PriceThank You	PriceThank You

HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description 3 x 3 Dual Prime Pump W/ 7/2 HP Delco Motor	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description Screens
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424 Description To~ Cargo~ Hart Pursme
Description	stripper (compute)
PriceThank You	PriceThank You
HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424	HENDRIX & ASSOCIATES AUCTIONEERS • LIQUIDATORS (806) 794-9649 5518 77th St. Lubbock, TX 79424
DescriptionScreen	Description TON CARBON HEAT PRISSURE STREPPEN (Umplete)
PriceThank You	PriceThank You

000213

Tucson Arizona Public records/10 Weather/10

uesday, November 2, 1993 •

Tucson Citizen

CITY EDITOR, JAMES R. WYCKOFF, 573 4560

Environmental Law

Exposure to environm

GEORGE M. ESAHAK AND JOSEPH A. DRAZEK

Special for the Business Gazette



Environmental liability changes real estate dealings

JAMES G. DEROUIN

Special for the Business Gazette

Environmental Law

MEMO

TO:

James A. Briscoe

FROM:

Thomas E. Waldrip, Jr.

DATE:

October 27, 1993

RE:

Gianetto's equipment, Tombstone Development Company

property, Tombstone Mining District, Cochise County, Arizona;

Project #101-01

Jim,

Pursuant to my initial review of inventoried equipment at Tombstone, it is quite clear that we are going to have continuing problems until resolution of who owns what. As it now stands, I have been able to separate out most of the equipment that Mr. Gianetto purchased through the Cowichan Mines auction, from that of the later Escapule/Cowichan/PBR work. I have inventoried and marked such equipment with a "G" (in blue spray paint) for Gianetto, and a "T" (with white spray paint) for TDC. Some equipment has been moved, but in general, much still remains on the property now, almost 5 years later. I did not attempt to inventory the remaining equipment, but this could be done if necessary.

Some question exists as to other equipment which might be owned by Mr. Gianetto. In particular, there is some structural steel for tanks and conveyors north of the new monitoring well, the conveying system associated with the old TEI crushing area, and a generator (which I have not seen as yet) on the south end of the property, according to Jesse.

My problems are these:

1. Timing - much work remains to be done, but in order to create an efficient and cost effective means of disposal of used equipment, I need to know if the equipment is going to be removed or not so it can either be scrapped, stored, or sold.

MEMO TEW to JAB Gianetto Equipment October 27, 1993 Page 1 of 3

- 2. If the above equipment is not removed, then who will own it? I do not want to be responsible for ordering something removed if it belongs to someone other than TDC.
- 3. Obviously, if Mr. Gianetto removes the major portion of the equipment, a lot of trash, etc. will remain. This will need to be cleaned up.
- 4. If the equipment is not going to be removed, then we need to decommission it, sell whatever can be, salvage what useful items there may be, store what remains, and trash the rest. Ultimately, then the items will need to be cleaned up to make sure there is no residual cyanide or heavy metal contamination. Plans need to be made if this is going to be necessary so proper equipment may be brought on site to perform necessary functions at one time, either with Mr. Gianetto or without him.

Jim, virtually no planning can be accomplished until ownership is determined, number one, and two, we cannot perform necessary requirements toward the State mandated clean up until Mr. Gianetto removes his equipment. Further, I don't believe the State cares who owns the equipment, they want it cleaned up, period. I don't feel that TDC would want to assume the responsibility for either allowing Mr. Gianetto to store the equipment on the property any longer or the possibility of being fined if it is not cleaned up and properly stored. I feel that TDC is not only liable to the State, but to any individual who might be injured should they be messing around on the equipment. Mr. Gianetto has had nearly five years to remove the equipment. He has had rent free use of TDC's property. He has not made overtures to pay rent, nor attempted to dismantle the equipment and safely store it on site. He has used TDC. Enough is enough.

I believe we, on TDC's behalf, with TDC's approval, need to confer with a lawyer versed in such matters, and formulate a plan to actively cause a removal or abandonment of the property owned by Mr. Gianetto. Only then can work proceed in an efficient and effective manner.

To this end, I have undertaken to determine any conditions established under terms of the auction sale. None were apparent in the brochure. Hendrix's telephone number has been reassigned to other parties, so I assume they are out of business. Therefore, the next step is to confer with legal council to determine necessary actions to be followed. Even though Mr. Niedfelt's letter to Mr. Gianetto should have clearly underscored the serious nature of the request, results have been negative to date. Until someone gets Mr. Gianetto's attention, stalling appears to be the order of the day. TDC can ill afford to wait another five years for resolution of the issue. The time to act is now!

Tom

MEMO

TO:

James A. Briscoe

FROM:

Thomas E. Waldrip, Jr.

DATE:

October 22, 1993

RE:

Gianetto Equipment, Tombstone Development Co. property,

Tombstone Mining District, Cochise County, Arizona; P101-01

Jim,

Pursuant to my review of Hendrix & Associates, Inc. auction held for Cowichan Mines, Ltd. on December 8, 1988, there is no mention of a removal date. Bill Gianetto made one bulk bid for \$25,000 and bought all the used equipment.

It would appear to me that he bought the entire gravel washing operation, the Carbon-In-Pulp (CIP/CIL) equipment located therewith, and the carbon stripper/carbon wash, heater, etc., located by the guard gates. Included was 20,000 pounds of activated carbon. No mention was made of the swimming pool filter tanks. He also bought all the paletted items north of the guard gate. I therefore think it will be a rather easy job to figure out what he owns and what he doesn't own.

The ultimate question is will Bill move the equipment? What value is it? What might it be worth in the future to a mining operation? Most of the washing operation and carbon operation appear to be serviceable. Since we have the possibility of having Sundt come in on a joint venture with us, maybe it would be wise to get their opinion on the usefulness of the remaining equipment before any choices are made, should the equipment not be moved. Ultimately, the equipment will have to probably be centralized or possibly just fenced off. Also, we will need, from Excellon's point of view, to get a lease to use the equipment and building in any future operations, if they are so inclined.

Tom

TEW/msb

MEMO TEW to JAB Gianetto Equipment October 22, 1993 Page 1 of 1

MEMO

TO:

James A. Briscoe

FROM:

Thomas E. Waldrip, Jr.

DATE:

October 22, 1993

RE:

Waste oil removal at Tombstone, Tombstone Development Co.'s

property, Tombstone Mining District, Cochise County, Arizona;

P101-01

Jim,

Pursuant to my trip to Tombstone on Wednesday, the following was accomplished:

- 1. Metro Oil, A.K.A. EFT Corporation, represented by Calvin, tested for chlorinated hydrocarbons in seven 50 gallon drums and two tanks. All passed with less than 250 ppm halogens.
- 2. Pumped seven 50-gallon drums, the 1,000 gallon oil storage tank, and 6,000 gallon diesel storage tank.
- 3. Removed approximately 1,000 gallons of oil and fuel from the tanks and trucked back to Tucson for disposal at cement factory.

Visual inspection of the drums and tanks indicated the following:

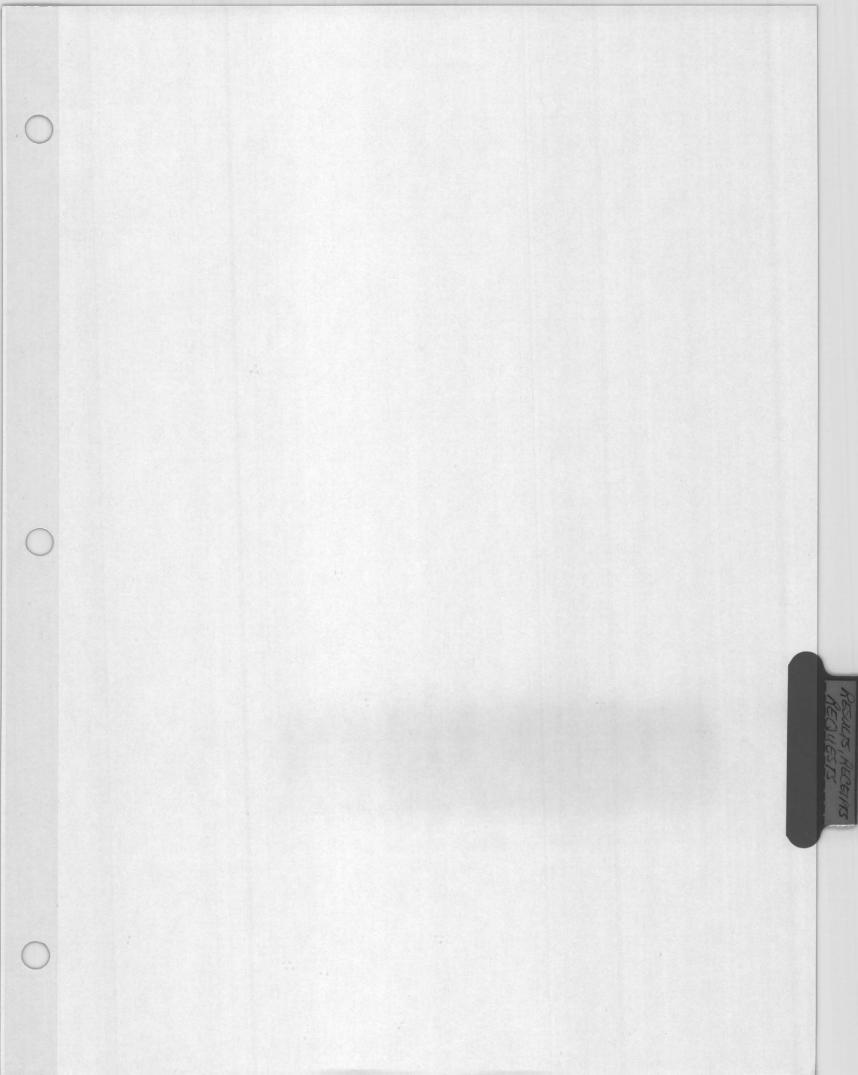
1. Oil storage tank, approximately 100 gallons of sludge and/or sediment plus residual oil remained in the tank which could not be pumped. Tanks need to be dug up, somehow cleaned, removing the sediment, or disposed of intact. Depending on the condition of the tank, Monday Chevrolet at Benson might be able to use it, according to Calvin. My analysis of the tank is that it is pretty badly rusted and possibly no good, but that cannot be easily determined until the tank is removed from the ground.

MEMO TEW to JAB Waste oil at Tombstone October 22, 1993 Page 1 of 2

- 2. The diesel storage tank is virtually dry, but should be removed as soon as possible to avoid water condensates from accumulating. The tank will probably need to be steam cleaned to meet state requirements, according to Calvin.
- 3. A number of smaller drums and containers contain oil filters, oil soaked rags, etc., plus a large amount of water. The rags and oil filters need to be drained and then consolidated into one closed container for disposal. The fluids in each of the barrels then needs to be put into an open barrel allowing the oil to float. The oil can be skimmed off and put into storage barrels for later removal. The excess water can be boiled off, solar evaporated, or disposed of by proper methods.
- 4. A small plastic ground cover needs to be set down and all barrels, drums, etc., consolidated to that area. I would suggest this be done in an area where the soil is already contaminated by oil (near the large oil storage tank), as we will have all the oily things located there ready for disposal.
- 5. Currently I find only three or four areas having oil/fuel saturated soils. Each area should amount to something less than one cubic yard of contaminated soil. However, near the large 1,000 gallon storage area, several tens of square feet have contamination with unknown vertical extent.

Tom

TEW/msb



Gary A. Lindroos P. O. Box 1011 Tombstone, Arizona 85638 (602) 456-9160

September 19, 1993

Mr. James Briscoe 5610 E. Sutler Lane Tucson, Arizona 85712

Dear Jim:

Yesterday Naomi and I ran 60 samples for free CN and pH. Most of the trenches on the PBR tailings area are finished and all of the samples from the TEI tailings area (No. 19 through 28 and also the No. 7 samples) are completed. The TEI tailings showed <0.01 mg/l of free CN throughout the pad. I am sure these tailings could be sold to your clients as soon as we verify the total cyanide with an independent laboratory.

I am enclosing the assays along with our current time sheets and the equipment price estimate which would make the laboratory fully operational.

As of this date we still have not received any payment for services from TDC. If you could give them a reminder it would be greatly appreciated.

If you have any questions concerning the assays please give me a call.

Sincerely.

Gary A. Lindroos

received



GARY A. LINDROOS P. O. Box 1011 Tombstone, Arizona 85638 (602) 456-9160

TIME SHEET

Date	Hours	Accum	Description of Work Accomplished	
8/14/93	4		Clean-up Lab Building, Start Inventory	
8/22/93	3.5		Clean-up Lab Building, Inventory	
8/29/93	5		Sample Tailings Pad, Assay for Free CN	
			Work on Lab Clean-up	
Total Hours		12.5		
9/4/93	6.5		Sample Trenches, Run Samples for CN	
			Sample Trenches, Sorted old PBR Files	
9/11/93	9		Sample Trenches, Analyzed Samples for	
9/12/93	6			
Total Hours		34		
9/18/93	9		Sample Trenches, Run Samples for CN	
Total Hours		43		

NAOMI R. LINDROOS P. O. Box 1011 Tombstone, Arizona 85638 (602) 456-9160

TIME SHEET

Date	Hours	Accum	Description of Work Accomplished
8/22/93	3.5		Assist in Inventory and Clean-up
8/29/93	5		Assist in Sampling Tailings Pads, Clean
			glassware, sample prep and lab clean-up
Total Hours		8.5	
9/4/93	6.5		Sample Trenches 3, 4, 5. Assist in assays,
			Prepared samples for bottle roll. Assisted in
9/12/93	6		Assay of samples. Clean-up in lab.
			sample prep and clean-up.
Total Hours		21	
9/18/93	9		Prepared samples for assay. Clean-up glassware.
Total Hours		30	



EQUIPMENT REQUIRED FOR BASIC LABORATORY SETUP

300.00

<u>Item</u>	Approximate Cost
Chipmunk or roll crusher	\$ 2000.00
Pulverizer	3000.00
Small Drying Oven	250.00
5 HP motor for Legend Crusher	250.00
Electrical Boxes for Crushers and Pulverizer & Furnace	100.00
Air Compressor	350.00
Acetelyne Tank	100.00
Pulp Balance	750.00
Micro Balance (for Au & Ag Fire Assays)	2500.00 (Used)
New AA Standards	
Reagents for Fire Assays:	
Soda Ash	
Borax	
Litharge	

Silica

Bone Ash

Potassium Nitrate

Additional reagents will be needed for special assays

We should have 2 Cyanide First Aid Kits

ASSAYXLS

40 A AA					
18-Sep-93					
		·····			
Sample ID	Mg/L Free Cn	рH	Sample ID	Mg/L Free Cn	рН
	!				
No. 19 0' - 3'	<0.01	6.5	No. 28 0' - 3'	<0.01	6.
3' - 6'	<0.01	6.5	3' - 6'	<0.01	6.3
6' - 9'	<0.01	6.5	6' - 9'	<0.01	6.4
9' - 12	<0.01	6.5	9' - 12'	<0.01	6.9
No. 20 0' - 3'	<0.01	6.4	No. 29 0' - 3'	0.98	7.2
3' - 6'	<0.01	6.5	3' - 6'	1.96	7.4
8' - 9'	<0.01	6.4	6' - 8,5	1.44	6.8
No. 21 0' - 3'	<0.01	6.5	No. 30 0' - 3'	0.72	6.5
3' - 6'	<0.01	6.6	3' - 6'	0.86	6,5
6' - 9'	<0.01	6.5	No. 32 0' - 3'	0.13	6.5
No. 22 0' - 3'	<0.01	6.5	3' - 6'	0.11	6.5
3' - 6'	<0.01	6.7	6' - 9'	0.48	5.9
6' - 9'	<0.01	6.5	No. 33 0' - 3'	0.19	6.8
9' - 12	<0.01	6.5	3' - 6'	0.56	7.0
No. 23 0' - 3'	<0.01	6.6	6' - 9'	0,05	7.0
3' - 6'	<0.01	6.7	9' - 11'	0.04	6.5
6' - 9'	<0.01	6.4	No. 34 0' - 3'	<0.01	6.4
9' - 11	<0.01	6.5	3' - 6'	<0.01	6.4
No. 24 0' - 3'	<0.01	6.3	6' - 9'	<0.01	6.5
3' - 6'	<0.01	6.5	9' - 11'	<0.01	6.6
6' - 9'	<0.01	8.5	5C 6' - 9'	<0.01	6.5
9' - 12	<0.01	6.5	9' - 12'	<0.01	6.5
No. 25 0' - 3'	<0.01	6.5	12' - 15		6.5
3' - 6'	<0.01	6.5	5D 0'-3	<0.01	6.4
6' - 9'	<0.01	6.6	3' - 6'	<0.01	6,6
9' - 12	<0.01	6.5	6' - 9'	<0.01	6.4
No. 26 0' - 3'	<0.01	6.4	0-0	*	
				18	
3' - 6'	<0.01	6.4		THE CATE TO THE	
6' - 9'	<0.01	6.6 e.e.		14160	1
9' - 11	<0.01	6.5		CARY ALVIN	mas
No. 27 0' - 3'	<0.01	6.6		ANTOROOS !]
3' - 6'	<0.01	6.4		(3,00,19.7)	<i>!</i>
6' - 9'	<0.01	6.4		To ONLY U.S.	
9' - 11	<0.01	6.5		CONA, O	

FROM Joyles A. Briscoe & Town JABA Inc. P.01 11-03-1993 08:08AM 11/3/93 0:12 Wednesday 11/03/1993 8:00 AM JAB 8:25 pm The 5.5 hrs w/ Tom is all with samples. & thus chargable to Excellon. Tuesday 11/02/1993 6:33 PM JAB 5.5 w/ Thw & worked 40 clearup. Jesse will confirm on voice mail tonight. TOM BIVETED Y Bill Gianetto was by a picked up some stuff. Exceller 5.5 hrs moving drill samples D \$ 9.20 = 50.60 10/20/93 40 hrs @ \$ 9 30 = 368 10/25/93 to 10/29/93 Joan - FYI. Mary Henderson didn't know what it was.

To: Bob MACER

From: Tom WALDRIP

DINTE: October 27, 1993

De: Melage Charges for Tombetone Project.

1306,

Below please find while relage charges by Project for Tombestone for billing:

- 1. Friday October 8, 1993 191 miles To & From Tombstone/Turbhogeit 159-01 Claim staking & coreboard set-up.
- 2. Wednesday October 20, 1993 167 miles To & From Tombrione / Tueson Project 101-01 Bil Removal
- 3. Tuerday October 26, 1993 180 miles To & Frons Tombstone / Tacson Project 101-01- 5TART inventory of equipment & trash to puck-up.

Thunks

John

ENVIR.

JESSE

889-0225 WALT Southwest Liquidarores Terrell's Battery Shop 622-6225 872 S. Plumer Ave Ellis Metals 1800 N. Stone 1(602) 456-9160 GARY CINDROSS STEVE HENDERSON } (602) 457-3579 Home 11 457-3415

OFFICE

Consultants in:

- Hydrometallurgical recovery
 Heap and conventional leaching
 Precious and base metals
 Uranium/Vanadium

- Tungsten

Worldwide Mobilization



S.E.A. Hydromet, Inc.

Division of Southwestern Exploration Associates

> 4500 E. Speedway, Suite 14 Tucson, Arizona 8 2 (602) 795-0-7



I weed to take pictures of 1. Assay house area. 2. Hond of pump and on sun way 3. Equepment to North-when 9 /art worked. 4. Buttler Building line a J. Crusher area. 9.20/hr. Jesse's time. reports EAST WASH PLANT ALONG TOE OF DUMP Area 1 Keenway trie dungs v around Sulphuret/array house. 11 Area Not Guard house, Make up water pond/Knot Hell. Carbon Stryping plant one . North Pet storage area! draft Old crushing plant area. Game Rein way chemp. / TEI well # 3 draft. Gravel dumps and tailingo ponds. draft. 10. Buttler Buildings. draft. PBR/cowhear operation heap & buildings draft draft South Pet Storage area 13. Crush Cyanede Cans. draft. 14. Clean out array house 15. Trash Demp.

Consultants in:

Hydrometallurgical recovery
 Heap and conventional leaching
 Precious and base metals

• Uranium/Vanadium

• Tungsten

Worldwide Mobilization



Division of Southwestern Exploration Associates

> 4500 E. Speedway, Suite 14 Tucson, Arizona 8 2 (602) 795-6097



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11

ANTO

S.E.A. Hydromet, Inc.

Things at Tombeton 1. Photograph Equipment - of Ganetto's ? Rull weeds from assay building 3. gather all the old PVC. pyre - stack on deemp 4 Mark Granett's o equip. done 5. - on conveyor & generator of Granetto le. Dany Sandros remove & store chemicals. 7. Kenrouer fires. & Stack in proper place. 8. Get array maps to gether of CN & metals 9. Outline clean-up areas. 10. Remove shacks and brailer house. 11. Stack batteries 12 Time sheets to Juse

James A. Briscoe President Registered Professional Geologist



Exploration Consultants In:
Base and Precious Metals, Uranium, Geothermal and Fossil Fuels
Air Photo Interpretation

1. Get old maps af sampling -> w ponds anas only sampled for againste - re construct map. 2. Fitte 49 Aryona Revised Enveronmental Statutes)
Title/27 (augona Mening Statutes) 3. This > 3' deameter Jone Walds Holbroh Cowachin Menes, oftd. Hendrix & associates auction (806) 794-9649 Rubboch, Texas ppM Dec. 8, 1988 =1mg/1 Water Total water Water Free Cyanide · 45 mg/kg tolAD (ASTM Method C) Starples.

James A. Briscoe President Registered Professional Geologist



MEMO

TO:

James A. Briscoe

FROM:

Thomas E. Waldrip, Jr.

DATE:

November 16, 1993

RE:

Estimate of Jesse Grassman's time to clean up TDC property; P101-1

Jim,

Pursuant to my conversations with you, I indicated I would get an estimate of the amount of time that would be necessary for Jesse to remove, stockpile and cleanup the various areas at Tombstone. In addition, herewith I have made an estimate as to approximately how much recyclable steel is located in each area. Some of this is still very preliminary, as I have not totally reviewed each area in detail:

			Labor Expense	
Area	Location	Hours	@ \$9.20/hr	Lbs. Steel
1	East of washing plant	30	\$ 276	1,000
2	Industrial tire depot	16	147	500
3.	Area around assay house	40	368	2,000
4.	Northeast storage area	5	46	25,000
5.	Make up water pond	30	276	500
6.	Carbon stripping plant area	20	184	500
7.	North pit storage area	8	74	22,000
8.	Old TEI crushing plant	50	460	1,000
9.	TEI runway dump	8	74	4,000
10.	Gravel/Settling ponds	24	221	2,000
11.	Butler building	45	414	1,000
12.	PBR/Cowichan heap leach	60	552	1,000
13.	South pit storage	6	55	4,000
14.	Knob Hill cyanide cans	50	460	-0-
15.	TEI assay house (interior)	32	294	-0-
16.	TEI/DP trash dump	?	?	?
	TOTAL	424	\$3,901	64,500

- Notes: 1. 424 hours divided by 8 hours/day = 53 man days
 - 2. 53 days divided by 5 days/week = 10.6 man weeks
 - 3. 64,500 lbs. of scrap steel = 32 tons remaining to be collected
 - 4. Of the 36,000 lbs. of steel already collected, only approximately 1/3 of the total amount has been removed from the property, based on my estimate above.
 - 5. Area #14 includes removal of only non-buried cans.
 - 6. Above hours and cost does not cover time for final removal and disposal of waste.
 - 7. Scrap steel removal and recycling not included in above time/cost estimate.

Tom TEW/msb

MEMO TEW to JAB Estimate of JG time to clean up TDC property November 16, 1993 Page 1 of 1

JABA, Inc.

MEMO

TO:

Jesse Grassman

FROM:

James A. Briscoe & Thomas E. Waldrip, Jr.

DATE:

November 18, 1993

RE:

Tombstone Development Company property clean-up of assorted trash, equipment, etc. from past operations, Tombstone Mining District, Cochise County, AZ; P#101-01

Jesse:

I would like to take this opportunity to thank you for the job you have undertaken to clean-up the TDC property at Tombstone. To date, I realize that we are only starting on the project, and much remains to be done. However, I feel you are the right person for the job, and through your efforts, the job will be done in a cost-effective and careful manner.

By necessity, Jim and I will have to defer much of the physical labors to you. Our interaction will be on a minimal basis, primarily limited to oversight, management, technical input, and interaction with the client, owners of the stored equipment, and the State. As discussed in the field with you, I will be undertaking a surface evaluation of the areas needing attention. Preliminary evaluation indicates approximately twelve (12) areas of major concern. I will be undertaking a more critical evaluation of each of these areas in the weeks ahead, as well as walking much of the property to ascertain any other problems that might be present. I solicit any input and comments you have concerning this work, especially in pointing out areas of disposed trash.

Jesse, Jim and I have few demands and expectations as far as your work goes. However, we do expect that you do the following:

- 1. Put in at least forty (40) hours of work per week, weather permitting;
- 2. Keep accurate records of your time;
- 3. Concentrate clean up efforts to one area at a time instead of piece-meal work;
- 4. Avoid further degradation to the environment; and
- 5. Above all, think safety first.

Currently, we have verbally outlined much of the work in general terms that needs to be accomplished. I would, however, like to memorialize these conversations in this memo to more clearly outline our expectations of your work. These instructions are not set in concrete, but fluid and ever-evolving and open to change. We are undertaking work by phases. My envisioned phases are:

PHASE I. Evaluation of the property - review areas needing to be cleaned up and provide for necessary documentation and reporting.

PHASE II. Weed and brush removal around building enclosures, work areas or trash sites.

MEMO to Jesse Grassman Clean up at Tombstone November 18, 1993 Page 1 of 19 PHASE III. Trash pick up, sorting and consolidation.

PHASE IV. Extraction of trash and partially buried metal, cans, pipe, etc., using motorized equipment (backhoe) if necessary.

PHASE V. Evaluate cleaned up areas, photograph and closure.

PHASE VI. Disposal of consolidated waste either on site or elsewhere - burn weeds and organic trash if possible.

Jesse, you will be involved with Phases II, III, IV, and VI

Before embarking on a description of each area to clean up, I would like to make some general suggestions. These are:

- 1. We need five general areas to consolidate trash and usable supplies at. These are:
 - a. Tires over 36 inches in diameter need to be consolidated along the runway near the deposit of old industrial tires now on the side of the dump.
 - b. New cyanide cans consolidated in or near fenced enclosure of new leach plant.
 - c. Trash near the old trash pile but on top. We should separate at least the following:
 - 1). Tires with and without rims including rubber lined hoses and belt liners.
 - 2). Plastic pipes, buckets, barrels, valves, etc.
 - 3). Pallets, lumber and wood.
 - 4). Organic trash (weeds, branches, etc.).
 - 5). Scrap metal (recyclable) aluminum, copper, stainless and iron.
 - 6). Non-recyclable metal, sheet metal, etc.
 - 7). Batteries
 - 8). Paper, office trash, used items, etc.
 - 9). Old cyanide drums.
 - d. Oil drums, containers, rags, filters, grease tubes, etc., should be placed near the underground oil storage tank, near old assay house.
 - e. Usable supplies should be consolidated near the old assay building on an area cleaned of brush and weeks, with same type items grouped together.

Whenever possible, an attempt should be made to place as much of the smaller scrap items in barrels or storage containers. You may find the old used cyanide barrels useful for this purpose (make sure they are clean, however). Useable supplies should (whenever possible) be placed on pallets (line the pallets up in one direction).

I have designated certain colors of spray paint and flagging to indicate ownership and/or usefulness as follows:

- 1. Blue "G" spray paint = Gianetto equipment (do not remove).
- 2. White "T" spray paint = TDC equipment or trash used only in areas of Gianetto

MEMO to Jesse Grassman Clean up at Tombstone November 18, 1993 Page 2 of 19

- equipment save for now unless flagged with red flags which should be disposed of.
- 3. Red flagging = trash or trash located in area remove all and consolidate to dump, or if steel, cut up and recycle in Tucson.
- 4. White flagging = equipment and supplies to be saved and stockpiled at old assay house.
- 5. Blue "X" spray paint = plastic pipe to be removed (to be used only in area of new heap leach operation).

We want you to work only 40 hours per week. This work should be strictly for clean-up operation on the property. As I have previously discussed with you, the remaining drill samples need to be loaded and stored in the Butler building. Please keep track of your hours and submit them on the weekly time sheet that I have given you. If we have rainy weather, we may want you to start separating out the samples in the back room (the samples we stacked from just outside the Butler building), but check with Jim or me first. There are 86 holes in total so I would suggest you set up 9 rows of ten each and place each drill hole in a separate pile in the room with the drafting table. As you might remember, the drill holes and intervals were all lumped together in the sacks, so this will probably take some time. Further, any work you do with your Grandad (Steve) should be done per his contracts and agreements with TDC and your wages figured accordingly with the agreed to compensation with him. Likewise, any metal salvage work is on your own time, as you have indicated it would be. Please understand that I am only trying to keep everything straight here, as various tasks are budgeted to different clients and in some cases the same client but different contracts. In short, your work for TDC will concentrate solely on the clean up operation, 40 hours work per week, and not on the drill samples nor the water wells, pumps, etc.

At this point, I see between six and eight weeks of work. I would like to set a goal of having the trash picked up, barrels removed, pipe removed and stacked, tires in order, and in general the property cleaned up by the first of the year. This will be a tough schedule to meet, but I believe it to be reasonable, assuming the weather holds. Additionally, I would like all the remaining outside drill samples stored in the Butler building by November 19th at the latest. I would also like to set a goal of hauling off as much of the scrap steel as possible by the first of the year. We hope to contract with the county to help remove the barrels on the hill and other items, but do not plan on this.

I have currently outlined sixteen (16) major areas for your attention. Additional areas also exist, but I have not checked them out as yet. Over the next several weeks I will be outlining work in each area that needs to be undertaken along with a time frame of how many hours I feel will be necessary to accomplish the tasks in each area, along with any additional explanation necessary. Please see the following attachments. The areas are assigned in the order that I would like you to perform the tasks in.

AREA 1

Location: East of washing plant, across road along northeast toe of waste dump, starting at tin shed.

General work: Clean up and remove all items including shed, barrels, waste PVC pipe, steel, wood & tires, along road and fence line.

Items to remain: White chemical pile

Salvageable materials: None directly observed - possible 4" metal pipe section. If there is a question, remove, separate and stockpile at the dump site for my review.

Scrap metal: Minor amounts of aluminum, scrap steel and stainless steel noted. Amounts limited and scattered. Pick up, separate and stockpile at dump site on TDC time for future recycling.

Other saleable materials: Old battery (auto) removed to dump, stockpile for removal to Tucson and recycling.

Non-usable items:

- 1. PVC, tires, rubber belts, wooden items & sheet metal to be picked up, transported and stockpiled on dump in appropriate areas.
- Oil drum to oil area.
- 3. Cyanide cans to cyanide drum storage area (dump).
- 4. All small items to be placed in drums or garbage cans at stockpile dump site.
- 5. Use garden rake to police up broken pipe and conveyor belt fragments.

Estimated time for job: 30 man hours.

Location: Runway tire waste dump, south of Westside mine.

General work: Clean up and remove all vehicle tires under 36" in diameter. Relocate collected tires to vehicle tire stockpile on dump.

Items to remain: All machinery tires greater than 36" in diameter for eventual burial.

Salvageable materials: None known.

Scrap metal: Several tire rims and large metal blade.

Other saleable materials: None known.

Non-usable items:

1. All tires under 36" in diameter removed to dump stockpile.

2. Steel items to be removed, stockpiled on TDC time, and recycled at Tucson.

3. At west end of area, several sacks of discarded drilling additives should be gathered up and placed on dump for future removal.

Estimated time for job: 16 man hours.

Location: Old assay house near Sulphuret mine shaft and 600 feet on all sides.

General work: Remove weeds, clean up and remove all items in area including trailer, trash, metal, wood, headframe remnants, and misc. furniture and appliances scattered in area around building.

Items to remain:

- 1. Building and supporting infrastructure await instructions and direction on cleaning out building.
- 2. Oil storage tank to be removed later.
- 3. Tires over city water main valve.
- 4. Oil drums and misc. oil/petroleum waste stockpile.

Salvageable materials: None directly observed - use your discretion. If there is a question, remove, separate and stockpile at dump site for my review.

Scrap metal: Numerous odd and end pieces of steel, machinery parts, etc. Noting consolidate, some partially buried. As part of clean up operation, pick up, separate and stockpile at dump site on TDC time for future recycling.

Other saleable materials: None directly observed; use your discretion.

Non-usable items:

- 1. Clean out all bushes and weeds at least 25 feet from building. Remove to the dump.
- 2. Pick up all trash, tires, wood and misc. at least 600 feet on a side around building.
- 3. Cut off old hoist post in concrete slab, flush with surface.
- 4. Remove what remains of the Sulphuret hoist structure and transport to the dump.
- 5. Pull trailer apart and take remains to dump area and stockpile.
- 6. Take all old weathered furniture and appliances to dump and stockpile in appropriate areas.

Estimated time for job: 40 man hours - weeds have already been removed from around the building to a great extent.

Location: Area northeast of old heap leach pad and north of guard gate entrance road.

General work: Remove weeds from area of guard house, clean up old pallets and misc. trash, including PVC pipe.

Items to remain:

- 1. All pallets with included supplies with blue spray paint "G".
- 2. Guard house
- 3. New water well and pipe.
- 4. Fence.

Salvageable materials:

1. Used trash can

Scrap metal: Various small pieces of steel with red flags attached - gather and remove to dump site for stockpiling and eventual removal to Tucson for recycling. Larger items can be cut up and removed at your time table, according to scrap steel removal.

Other saleable material: Two old equipment batteries - stockpile and recycle in Tucson.

Non-usable items:

- 1. Old pallets save useable ones near old assay house; the unusable ones stockpile on area of old dump (this has already been done)
- 2. Pick up and separate scrap steel on dump stockpile.
- 3. Remove weeds in area of old guard shack.
- 4. Cut up and remove larger steel items flagged red and recycle on your own time, per agreement.

Estimated time for job: 5 man hours

Location: Make-up water pond; PVC pipe to wash plant; Lower roads around Knob Hill.

General work: Remove gate valve wooden bridge in make-up water pond; pick up trash along roads to east and south of Knob Hill. Remove PVC ground lines to east of make-up water pond.

Items to remain:

- 1. PVC pipe inside pond banks
- 2. Valve box on west side of pond.
- 3. White chemical in overflow area east of pond on plywood.
- 4. PVC pipe going south to new leaching area along road.

Salvageable materials: None noted

Scrap metal: Minor amounts (small items)

Other saleable materials: None noted

Non-usable items:

- 1. Wooden foot bridge to gate valve (north side of pond) pull down and remove remains to dump stockpile of wood.
- 2. Pick up red flagged trash along roads. Transport to dump stockpiles.
- 3. Drag out, cut, load and transport 8" PVC pipe from make-up pond to washing plant settling tanks; to be stockpiled on dump area.
- 4. Drag out, cut, load and transport 4 power poles and wire near water well on the southeast side of Knob Hill to the wood storage area on the dump wire is aluminum.

Estimated time for job: 30 man hours

Location: Old carbon stripping plant enclosure (fenced area with two cinder block buildings southwest of guard gate).

General work: In the southern one-half of area along the east, west and south fences are stacked numerous pieces of electronic hardware barrels, PVC pipe and misc. bits and pieces of equipment. Remove all items to waste dump storage area except as noted below.

Items to remain:

- 1. All items marked with blue spray paint "G"
- 2. All stainless steel swimming pool filter tanks along east fence.
- 3. All fiberglass filters stacked in the southeast corner (going to SS filter tanks). Leave them stacked there for the time being.
- 4. All electronic hardware in area.
- Buildings and fence.

Salvageable materials: None directly observed (use your discretion). If there is a question, remove, separate and stockpile at dump site for my review.

Scrap metal: Numerous odd and end pieces of steel, parts, etc. Nothing consolidated. As part of clean up operations, pick up, separate and stockpile at dump site on TDC time for future recycling.

Other saleable materials: None directly observed.

Non-useable items:

- 1. Clean out all weeds in fence enclosure area.
- 2. Replace parts on to the SS filter tanks that are scattered around.
- 3. Pick up all trash, wood, PVC pipe, barrels, etc., and remove to the proper dump storage area.
- 4. After removal of other materials, try to find open barrels to place the circuit boards into. The remaining electronic equipment should be placed into barrels or stockpiled along south fence, in one area for future disposal. Try to avoid breaking the CRT's.

Estimated time for job: 20 man hours.

MEMO to Jesse Grassman Clean up at Tombstone November 18, 1993 Page 9 of 19

JABA, Inc.

Location: Silver Thread/North Pit storage area.

General work: Scrap metal/equipment removal, removal of PVC pipe and misc. cleanup.

Items to remain: Straw bales.

Salvageable materials: None noted.

Scrap metal: Several pieces of old equipment, motors, pumps, tanks, etc., to be cut up, hauled off, and recycled on your own time.

Other saleable material: None noted.

Non-useable items:

1. Scrap metal, as noted above.

2. PVC pipe, small metal pieces, barrels, wood pallets, and misc. to be picked up, transported to dump stockpiles, and separated for later disposal.

3. Industrial tire removal.

Estimated time for job: 8 man hours.

Location: Old crushing plant area on northeast side of pit, south of the Butler building.

General work: Clean up and remove all items including buildings, power poles, wood retainers, misc. steel and drums; remove accumulated trash and weeds from below ground level conveyor area.

Items to remain:

- 1. Conveyor silo.
- 2. Conveyor.
- 3. White chemical at north end of area to be removed later.
- 4. Septic tank? underground storage tanks? to be removed later.

Salvageable materials: None observed.

Scrap metal: Many widely scattered pieces of metal noted. As part of clean up operation, pick up, separate and stockpile at dump site on TDC time for future recycling.

Other saleable material: None noted - possibly the toilet bowl.

Non-useable items:

- 1. Pull down or remove two old shacks load and remove to dump.
- 2. Pull out metal "T" fence posts at north end of area, remove to dump.
- 3. Remove power pole and remaining power lines; remove to dump. Separate as to materials.
- 4. Remove grease drums to oil related storage area.
- 5. Remove wooden retaining wall and dispose of wood at dump (see me on this first).
- 6. Remove weeds and trash along conveyor belt section.
- 7. Pick up scrap metal and related trash in area.

Estimated time for job: 50 man hours.

Location: TEI runway waste dump/TEI well #3.

General work: Remove trash piles, drums, water pond plastic, scrap metal and misc.

Items to remain:

- 1. Electrical connection to TEI well #3 2" white PVC pipe
- 2. Usable water line exiting well, 3" PVC (white) pipe.
- 3. Cargo container.
- 4. Industrial tires awaiting disposal.

Salvageable materials: None noted.

Scrap metal: Four pieces of metal, 1 tank and 3 equipment frames of some sort exist along the waste dump; two are on the east end on the north side and are flagged; the third is located on the west end just north of the gate, and is also flagged. Remove per terms of scrap metal removal agreement. The tank is located near the well.

Other saleable material: None noted.

Non-useable items:

- 1. Drive roads on dump and pick up trash previously collected and take to dump stockpiles.
- 2. Clean up excess PVC pipe and misc. around water well, separate on dump.
- 3. Remove metal fence post around small pond, near water well.
- 4. Remove and clean up all plastic sheeting in pond area.

Estimated time for job: 8 man hours.

Location: Gravel dumps and settling ponds north of wash plane, includes '71 Minerals heap.

General work: Remove plastic PVC pipe, sheeting and misc. trash.

Items to remain: Nothing noted.

Salvageable materials: Nothing noted.

Scrap metal: Minor amounts scattered around area; pick up and stockpile on TDC time for future recycling.

Other saleable material: None noted.

Non-useable items:

1. PVC pipelines and misc. pieces scattered around area.

2. Stock tanks and misc., partially buried metal north of make-up water pond - remove to dump.

3. Cyanide and misc. barrels just west of washing plant settling tanks.

4. Misc. rubber hoses and electrical supply wiring around settling ponds (some may have to be dug up using backhoe).

5. Black plastic sheeting used at base of gravel piles.

6. Minor scrap steel rails and screen in waste dump rock area northeast of make up water pond.

Estimated time for job: 24 man hours

Location: Butler building wedge - area from TEI #11 water well to south boundary, which is the old '71 Minerals heap.

General work: Remove weeds from around Butler building; clean up and remove all items in area to designated areas at stockpile dump, including barrels, trash, scrap steel and small sheet metal buildings south of the Butler building.

Items to remain:

- 1. Butler building and contents.
- 2. Water storage tank.
- 3. Water pipes.
- 4. Power poles and lines for the time being.
- 5. Wells TEI #1 and TEI #2.
- 6. Drilling and misc. samples in sheet metal storage buildings.

Salvageable materials: Some materials potentially exist - use your discretion. If there is a question, remove, separate and stockpile separately at dump for my review.

Scrap metal: Minor amounts of steel noted. Amounts limited and scattered. Pick up, separate and stockpile at dump site. This is on TDC time.

Other saleable material: Await further review by myself.

Non-useable items:

- 1. Clean out all bushes and weeds at least 25 feet from building and remove to dump.
- 2. Remove two sheet metal buildings (see me on this first).
- 3. Pick up all trash, tires, wood, scrap steel, PVC pipe and misc. within 600 feet diameter around building.
- 4. Drums to proper storage area.
- 5. Geological/drill samples to Butler building.

Estimated time for job: 45 man hours.

Location: PBR/Cowichan heap leach operations including pads, building and storage yard.

General work: Remove all delivery PVC pipe (blue spray paint "X") including waste pipe; pick up trash; all cyanide cans in locked fence enclosure; police area; consolidate usable equipment in appropriate buildings; remove weeds.

Items to remain:

- 1. 2 brick buildings.
- 2. Fenced/covered storage area.
- 3. Used (new) cyanide cans in storage area.
- 4. All PVC plumbing necessary for heap drainage.
- 5. Usable equipment/supplies.
- 6. Equipment in buildings.

Salvageable materials: None noted - all supplies/materials which are usable will remain with the operation, hopefully protected from the elements.

Scrap metal: Only very minor amounts of material are present. Pick up, stockpile on dump on TDC time, recycle in Tucson.

Other saleable material: None noted.

Non-useable items:

- 1. Cut all weeds and bushes within 25 feet of any building or fenced enclosures; haul off to the dump stockpile.
- 2. Organize equipment outside/inside the building to point in building where used.
- 3. Gather up all trash, tires, metal, wood and misc. surrounding buildings and enclosures and transport to dump stockpiles and separate.
- 4. Clean up all the smelting crucibles, including fragments and transport to dump storage stockpile.
- 5. Police up all the new cyanide cans and make sure they are located in the fenced enclosure.
- 6. Clean up/out the smelting and precipitation buildings (save all the paperwork and samples present).
- 7. Remove all excess and distribution portion of PVC plastic pipe to leach pads (note this will be spray painted with a blue "X").
- 8. Remove oil containers and misc. to storage area (located near generator shed).
- 9. Organize stored equipment and supplies north of smelting building.

Estimated time for job: 60 man hours.

MEMO to Jesse Grassman Clean up at Tombstone November 18, 1993 Page 15 of 19

JABA, Inc.

Location: South pit storage area.

General work: Remove and clean up all misc. pieces of steel and parts to stockpile dump storage area.

Items to remain: None noted.

Salvageable materials: I have not reviewed in detail yet (see me).

Scrap metal: Several items noted which need to be disposed of per agreement on recycling.

Other saleable material: None noted.

Non-useable items: Collect all trash and small steel items and transport to dump stockpile area, separate on TDC time.

Estimated time for job: 6 man hours.

Location: Knob Hill cyanide can disposal sites.

General work: Clean up and remove all crushed cyanide barrels, lids, rings and misc. trash on side and top of Knob Hill.

Items to remain: Nothing.

Salvageable materials: None.

Scrap metal: None.

Other saleable material: None.

Non-useable items: Gather, load and transport all crushed cyanide barrels, lids and rings from top of hill and on the side to stockpile area on dump. Try to consolidate as much as possible. At this time, remove only that material (cans, etc.) which are uncovered and easy to pick up. The material under rocks and soil can be left ad we will get a backhoe in to unearth these items. Leave the materials in the inclined shaft area.

Estimated time for job: 50 man hours.

Location: Old TEI assay house.

General work: Remove all chemical containers and laboratory glassware, etc.; clean up paper files and box; clean up and out building.

Items to remain: Building

Salvageable materials:

- 1. Laboratory chemicals.
- 2. Laboratory glassware.
- 3. Sample pulps.
- 4. Misc. paperwork.
- 5. Misc. parts?

Scrap metal: None noted.

Other saleable material: None noted.

Non-useable items:

- 1. Collect all laboratory chemicals check with Gary Lindroos as to where he wants these stored.
- 2. Collect all laboratory glassware check with Gary as above.
- 3. Clean up and box all old files.
- 4. Remove sample pulps and/or samples to Butler building.
- 5. Clean out remaining contents of building remove to dump and stockpile.

Estimated time for job: 32 man hours.

Location: TEI/DP trash dump.

General work: Await decision and conference as to closure with ADEQ and Attorney General's office. Status of clean up uncertain at this time. Certain amounts of recyclable products noted in trash stream including scrap steel. Await further instructions prior to removal of scrap steel or other metals.

Items to remain:

Salvageable materials:

Scrap metal:

Other saleable material:

Non-useable items:

Estimated time for job:

Location: Empire Mine area and to the south

General work: Clean up sheet metal, wood, trash and wildcat oil change area, and take what you can to city dump.

Items to remain: Oil drum, building (core storage shed), fence, mine enclosure

Salvageable materials: None noted

Scrap metal: Minor amounts noted along fence

Other saleable material: None noted

Non-useable items:

1. Collect all trash - generally police area.

2. Remove sheet metal and scrap wood scattered around building and immediately

surrounding trees.

3. Immediately south of building, approximately 200', is a concrete slab with a ramp out over a low area which was used as a wildcat oil changing area. Remove ramp, clean up all the old oil filters and trash. Barrel of oil and water should be left for eventual disposal.

4. Put oil related items at oil contaminated storage area.

Estimated time for job: 24 man hours

Location: City of Tombstone Chlorination building, Tranquility mine

General work: Remove trash, wood, steel, plastic sheets and pipe, etc. from area, and take what you can to the city dump

Items to remain: Building, fences, electrical lines and poles, concrete slabs and mine bulkheads

Salvageable materials: None noted

Scrap metal: Minor amounts in area east of building in clearing

Other saleable material: None noted

Non-useable items:

1. Clean up several piles of trash and take to city dump.

2. Police area and clean up scattered wood, plastic sheeting and pipe and take to city dump.

3. Remove remaining wood, remains of Tranquillity mine hoist structure. Note: leave this until the end of project - check with Jim or I before doing anything with this.

Estimated time for job: 8 man hours

Location: Cleared area south of City chlorination building, southeast of water tank hill, north of D & P wildcat dump.

General work: Remove minor trash, cyanide barrels, plastic pipe and misc. steel items. Await ADEQ discussions of buried cyanide barrels in area just south of chlorination building

Items to remain: Five full plastic barrels (awaiting characterization of fluid)

Salvageable materials: Laboratory furnace, of questionable value - give to salvage firm if they want it

Scrap metal: Widely scattered small pieces of steel exist in the area. Consolidate into stockpile on TDC time. Recycle at your time and expense.

Other saleable material:

Non-useable items:

- 1. Clean up and police area for minor amounts of trash and plastic pipe scattered widely over the area and take what you can to city dump.
- 2. Clean up widely scattered cyanide barrels and stock pile on dump area.
- 3. Remove empty plastic drum to dump stockpile.
- 4. Have furnace removed if possible by scrap dealer.
- 5. Characterize fluids in 5 plastic 50 gallon barrels (Jim or I will have this done).
- 6. Await final decision of ADEQ as to disposition of partially buried cyanide drums, as to whether we need to dig the up or finish burial along slope of dump.

Estimated time for job: For trash removal and consolidation of steel - 8 man hours

Location: Empire Mine core storage building.

General work: Check with Gary first. Test all chemicals; remove useful chemicals and store at assay building; stockpile non-useful chemicals for proper disposal. Clean up trash. Review with Jim or Tom the samples stored in building - check first on whether to save or dispose of these samples. If samples are saved, we need to re-organize, label, box and store them.

Items to remain: For the time being, the building core racks and core, samples, sample splits and possibly other useful items to be reviewed by Jim or Tom.

Salvageable materials: After checking with Gary, most of the chemicals may be useable.

Scrap metal: None noted.

Other saleable material:

Non-useable items: See attached Memo.

Estimated time for job: Depending on the state of clean up, between 20 and 100 man hours. 20 hours to clean up and organize building; 100 total hours to remove core, samples, etc. and restore and then tear down building and dispose of it.

MEMO

TO:

James A. Briscoe

FROM:

Thomas E. Waldrip, Jr.

DATE:

February 14, 1994

RE:

Core storage building, Empire Mine area, Tombstone Mining District, Cochise

County, Arizona; JABA project #101-01

Jim,

Pursuant to my trip to Tombstone on January 25, 1994, I was finally able to get inside the Empire Mine storage building. Jesse and I cut the lock and put a new standard lock on it. As I have previously described to you, other than the core, the building contents are in a massive pile, including TEI sample pulps, TMR coarse drill cuttings, and what appears to be '71 Minerals chemicals near the bottom.

In a quick review of the building contents, I noted most of the chemicals were in 50 to 100 lb. sacks and up to 50 gal. barrels, scattered around. It appears the contents have accumulated in a stratigraphic sequence with the oldest at the bottom to the newest at the top, corresponding to each operation that has been conducted on the property, the core being the oldest, circa 1954 (Newmont underground drilling), with latest being numerous boxes of TEI pulp assay samples.

Due to my brief time in the building, I cannot give a full accounting of what is in it nor the usefulness of items, but in general terms, the following is what I believe should be done.

First, from rat droppings, the building appears to be rodent infested. Extreme care needs to be taken to see that workers are protected from any potential harm to their health. Secondly, the amount of chemicals creates another health hazard. Those accessible need to be immediate characterized, cleaned up, and either properly stored or stockpiled for disposal, out of the building area. Once the building is stabilized, as far as the rodent and chemical hazards are concerned, a more complete inventory of geological sample content can be made.

Initial review suggests there are at least three distinct sets of samples that are contained in the building. One set is core samples against the east wall of the building. The samples are well organized, but apparently lacking any labeling or blocks to indicate hole # and footage intervals. If this information cannot be determined, these diamond core samples are essentially useless. A more careful examination will need to be made to ascertain the existence or non-existence of labeling. If labels are found, I believe the core should be removed to a more secure spot, i.e., Mobile Mini.

The second set of samples is from TMR's drilling, circa mid-1970's. These samples are contained in 1/2 gallon plastic pail containers which appear to have pretty much deteriorated to the point where a few containers appear to remain whole on the surface. Instead, there is a pile of drill cuttings. Underneath the outer layer of debris, containers may remain in good shape. If this is the case, these samples may be capable of being saved. However, they will have to be carefully handled as the plastic

MEMO TEW to JAB RE: Core storage building Empire Mine area February 14, 1994 Page 1 of 2 containers are very brittle. Ultimately, an evaluation will have to be made to ascertain if these samples are even worthwhile saving or not. Other major drawbacks of these samples are also evident. Many of the samples are from shallow holes, drilled in currently unknown locations. Given the current informational base available to me and apparent condition of samples, I believe we may want to just dispose of the samples on the dump.

The third set of samples (I checked only 2 boxes) is an unorganized set of approximately 100 storage boxes stacked 3 to 4 high in the remainder of the building. The boxes are about 2.5 cubic feet in size (18" x 16" x 14") rough estimate). Most are crushed by the weight of overlying boxes, until there is remaining about a 3' high mass of box debris. Inside these boxes are what appear to be relatively intact pulp sample bags with pulped samples. A review needs to be made to ascertain if there is enough information on the bags, boxes, etc. to piece back the sample information to a coordinate field position where the sample was collected. If the information is insufficient to do this, these samples are probably useless and should be taken to the dump. On the other hand, if the samples are properly labeled, I would suggest that they be organized for valuable information as to where ore zones were located during previous mining activities on the property and additional information. Additionally, even if the samples are only identified with a sample number, we may eventually be able to piece assay information back to it. The samples can always be disposed of later if need be.

My initial thoughts are that any samples which appear to be of some future use should be at a minimum re-boxed, carefully labeled, and then ideally stored in a Mobile Mini storage unit. At this time, I don't even have a guesstimate of how much labor or expense will be involved in the project, but obvious indications are that it will be no less than a major undertaking. It must be kept in mind, however, that per the ADEQ, we have to characterize and properly store and/or dispose of what chemicals are located on the property. Additionally, remaining buildings need to be rodent proofed. Since this building lies within meters of occupied homes, I do not feel we have much latitude as far as cleaning up the mess goes. Being that the chemicals are on the bottom of the heap, we have to move the samples anyway. Since it will be difficult at best to rodent proof the building, I think we need to carefully evaluate the samples as to their future usefulness. We should only move them once, either to the dump or rodent proof quarters, i.e., a Mobile Mini storage unit.

Once the building is cleaned out, I believe a careful evaluation needs to be made to ascertain its continued existence. Needed repairs are obvious. The building is not secure with only a wooden plank door. In my estimation, the building is a potential arson target, which threatens surrounding occupied properties. Furthermore, there is an obvious rodent problem. Access to the area is basically unrestricted, and as pointed out above, is very near occupied homes. Additionally, from a purely aesthetic point of view, the area is an eye sore. If the past is prologue to the future, as long as the building remains, it will continue to be a convenient catch all storage structure to whom ever is on the property. I therefore question if the building is not a liability to TDC. I feel it is and would strongly recommend that the building be demolished and the remains transported to the dump after all useful samples are removed.

Tom
TEW/msb

MEMO TEW to JAB RE: Core storage building Empire Mine area

February 14, 1994 Page 2 of 2



15 Test CANIVIN 15 Test CANIVIN 15 Test Br 291-7506 104 Land Dise MEMO 1000 ppm total C

Calvin, (Mark)
Metrodil
(Formally Fie)

TO:

JAB

FROM:

TEW

DATE:

September 17, 1993

RE:

Waste oil clean up at Tombstone, JABA Project #101-01

Jim,

Pursuant to my work on finding someone to remove petroleum products and clean the soil up at Tombstone, in general it appears that we have two routes to go:

- 1. Hire someone qualified in the field to make an environmental audit, take samples, and provide a report, which will be followed, and then oversee clean up; or
- 2. Try to do it ourselves.

The first is the easy way out and the second will entail getting up to speed on all the rules, regulations and correct protocol pertaining to the various issues, and then overseeing the reporting and remediation efforts of subcontractors. Most of the rules and regulations are contained in the Arizona Revised Statutes, however, some are still in the proposal state.

People I have contacted have generally been open to question but it is hard to ask the proper questions when you know nothing of the subject matter. What I have been able to determine is that there are several test procedures used for petroleum products. The correct procedures need to be determined to correctly characterize the waste materials. It is not so much a matter to determine what they are, but more a need to determine what is in them. Apparently, characterization means determining how they will be disposed of, reused (re-refined), burned, or hazardous to be disposed of out of state. Needless to say, the cost varies for each type of disposal. Before we know what it will cost, we need to know what they need to be tested for. Once we

MEMO TEW to JAB Waste oil clean-up at Tombstone September 17, 1993 Page 1 of 3 know that, then we can determine the analysis cost. Before we get an analysis, we need to find the proper sampling protocol, etc., etc. Once this is done, then we can find someone to pump the tanks and transport it to a disposal facility. Basically, as I understand it, this is what needs to be done with the contaminated soils also. As I understand it, once you remove the tanks and soil, additional samples are taken to make sure everything is cleaned up. The same apparently applies with the storage tanks.

The way it has been stated to me is to error on the side of caution. Do not assume anything, or take things for granted. Get everything in writing, and cover your ass, no matter the cost. One person stated it was preferable to do things right the first time, even though it is costly, as next time it may mean your business!

Jim, I have gotten a hold of several people in the consulting business, of which there are a number (see Pages 513, 518 ad 1420 of the current Yellow Pages). Wally of Haztech Enviro-Systems, Inc. (298-3040) was the most helpful and informative. Several I have contacted and left my name and number with. Most want to do an environmental audit. I have tried to get a hold of two waste oil transporters and have played telephone tag. Have found out though that the general charges for non-contaminate oils would be in the \$.10 to \$.25 a gallon range for removal and disposal, not including mobe and de-mobe to the site (no numbers as yet).

Dave Smith of Turner Labs (882-9788 - see attachment) was very helpful and was (highly?) recommended by Bill Limbeck over at Skyline Labs. He quoted me prices on several tests, i.e.:

BLS-181	\$ 45/sample
Metals (8)	\$140/sample
Flash Point	\$ 25/sample
PCB	\$ 95/sample
8015	\$125/sample

Some of these will need to be carried out on the oil and apparently others on the contaminated soils.

MEMO TEW to JAB Waste oil clean-up at Tombstone September 17, 1993 Page 2 of 3 If we are going to be involved in these types of environmental issues in the future, I would strongly recommend that we start getting a library together of the regulations so that we can become better informed as to what needs to be done, how it should be done, etc. Many of the rules are in the ARS Title 49. I assume Don Bell could direct you to the various other important titles. Apparently, others are in A.A.C.R. (Rules) manual. I imagine we can get Bob to get copies of these from the Secretary of State.

Please advise.

Tom

TEW/msb

MEMO TEW to JAB Waste oil clean-up at Tombstone September 17, 1993 Page 3 of 3



TURNER/CAS

LABORATORIES INC.

		FAX TRA	NSMITTAL	/ /	
TO:	Ton	WALDRI	DATE:	9/17/93	
FROM:	DAVE	SMITH	FAX #:_	721-276	8
Message:	•	1 had a label at the state of t			***************************************
				• //	
	lom -	Attachod	ie some	information	
that		help you	in deter	simony wh	lat
yan	neal.	ASI	stated	on the	phone
this	is only	what i		stand to	
the 1	cure	and the	Λ -	1	contact
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IMPORTANT NOTE:

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TURNER/CAS LABORATORIES, INC. 1844 West Grant Road, Suite 104 Tucson, Arizona 85745 (602) 882-5880 (602) 882-9788 - FAX

MEMORANDUM

Date:

February 23, 1993

To:

Tim Rand, Donna Rivera, Tom Tomchak, Woody Turner

From:

David Smith

Subject:

Waste Oil

Today, I spoke with Robert Virval of ADEQ regarding testing of waste oil for disposal. I asked him what parameters that they require of an oil to determine the method of disposal. He said that ADEQ looks for the following:

Metals - As, Cd, Cr, Pb (TOTAL)

PCBo

Flash Foint

Total Halogens

He also stated that in the case of waste automotive oil from service stations, the PCBs were not needed on all samples, but could be spot checked about once per year.

Jim This is Turner Labr understanding

Pave Smith suggested we contact above

Nesewer person of ADEQ and get them

reserved pout down exactly what tests will

be necessary, both for tanker and

soil as a CYA measure to fall

bruch on after completion of work.

SUGGESTED SOIL CLEANUP LEVELS

Total Patroleum	Benzene	Toluene	Ethyl-	Xylene	VOCs
Hydrocarbons			Benzene		*
100 mg/kg	0.13 mg/kg	200 mg/kg	68 mg/kg	44 mg/kg	

Requested ADHS Approved Test Methods			
CONTAMINANT	трн	BTEX	VOCB
Gasoline	BLS-181	8,020	NR
Kerosene	BLS-1.81	8020	NR
Jet Fuel	BLS-181	8020	·NR
Diesel	BLS-181	NR NR	NR ·
Heavy Oil	BLS-181	. NR	NR
. Waste Oil	BLS-181	NR .	8010
Solvents"	BLS-181	NR .	8010

Footnotes:

Soils containing volatile organic compounds are often classified as hazardous wastes. Call the ADEQ's Hazardous Waste Compliance Unit at 207-4108 for

Contact ADEQ's UST Hydrology Unit at 207-4268 or an analytical laboratory for guidance on appropriate test methods for particular semivolatile solvents of

NOTE: BLS-191 may be used to qualify BLS-181 data where there is a question of possible interference to the method: or to help characterize what was released. NR Not required.

AQUIFER WATER QUALITY STANDARDS

Total Petroleum.	Benzene ,	Toluene	Ethyl-	Xylene	vocs
			Benzene		
Hydrocarbons	E 40/1	1000 μg/1	700 µg/1.	10,000 µg/l	Ω
N/A	5 μg/l	TOOC 1-21			

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· R	equested ADHS Appr	oved Test Methods	
CONTAMINANT	трн	BTEX	VOCs
All Petroleum	418.1	502.200	502.200
Hydrocarbons			the second secon

Footnotes:

- Refer to most recent AWQSs and HBGLs for information on specific compounds.
- The first round of water samples from a newly completed well must be analyzed using EPA Test Method 502.2. Subsequent samples may be analyzed using 503.1 upon ADEQ approval.
- N/A Not applicable (i.e. standards have not been established.)

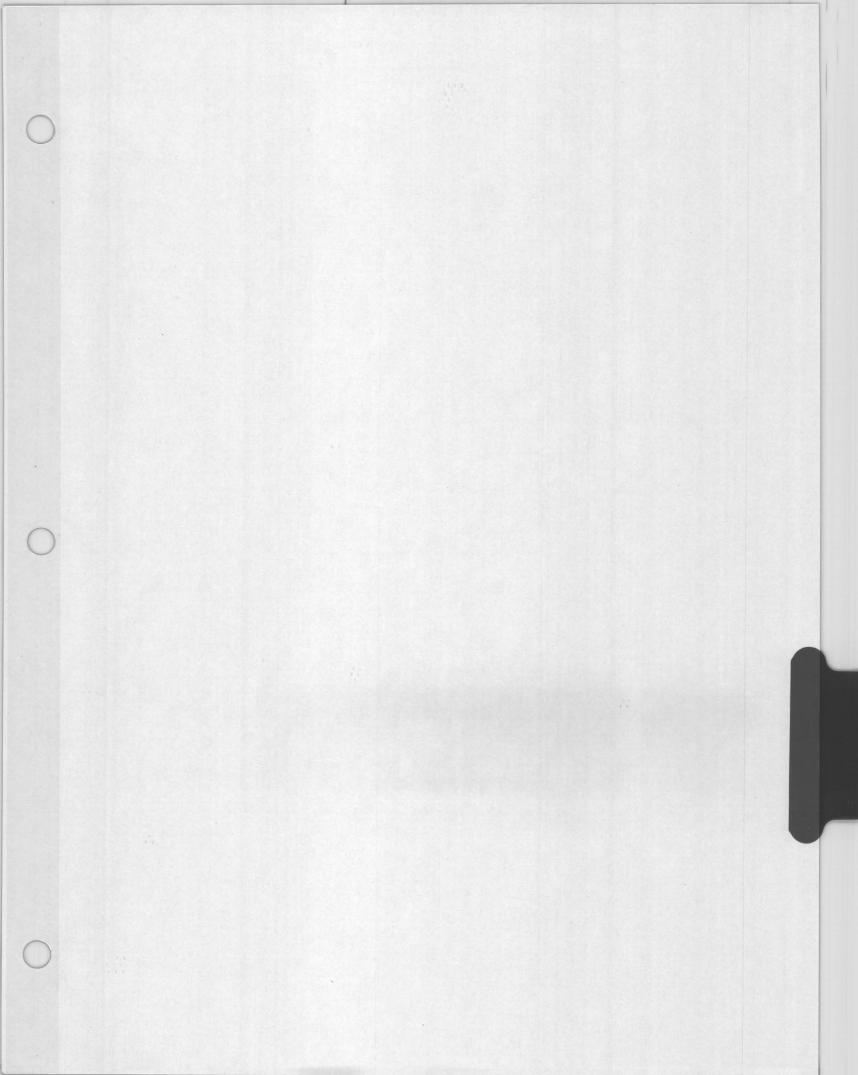
Nº 15341

E.P.A. Manifest Record

Generator of Waste (filled in by producer)
Name To Tombstone Development
Address 2100 N. Wilmot Suitt 218 Type of Waste 8) - 0 - 250 PPM
Type of Waste 8) - 0 - 250 7779
Waste Oil Gals / 000
☐ Waste Antifreeze Gals
This waste is described to the best of my ability and it was delivered to a licensed Liquid Waste hauler. There are no Listed Hazardous Materials in this product. I certifiy (or declare) under penalty of perjury that the foregoing is true and correct.
signature of authorized agent and title
Transporter: 8 Ted 25,00
285 9141 EFT Corp. 3165 E. 48th St. Tucson, Arizona 85713 622-3467 EPA# AZDO 77536019
Vehicle # 15 12/2/97
signature date

E.P.A. Manifest Record

Generator of Waste (filled in	by producer)
Name 177 Comp	tone Development
Address 2100 N - Wi	LMOT SUITE 218
Type of Waste 8) - 0 -	250 PPM
∕∕ Waste Oil	Gals <u>/000</u>
☐ Waste Antifreeze	Gals
This waste is described to the delivered to a licensed Liquid Wa Hazardous Materials in this propenalty of perjury that the foregoing signature of authorizations.	aste hauler. There are no Listed luct. I certifiy (or declare) under ing is true and correct.
Transporter: 87	A0 25-00
865-4141 EFT Corp. 3165 E. 48 Tucson, Ar 622-3467	od 900 izona 85713 O 77536019
Vehicle #	ingers
COM/ou	- 10/2497
signature	date





JABA INC. 2100 N. Wilmot Rd. #218 Tucson, AZ 85712 (602) 885-9141 (FAX) 721-2768

November 8, 1993

Mr. Jerome Niedfelt, President Tombstone Development Company P. O. Box 1445 Grand Island, NE 68802

TDC's patented mining claims environmental clean up, Letter of Understanding, Tombstone RE: Mining District, Cochise County, Arizona. JABA #101-01

Dear Mr. Niedfelt:

Pursuant to correspondence dated July 8, 1993, from the Arizona Department of Environmental Quality to Tombstone Development Company (TDC), TDC is under mandate by the State of Arizona to carry out certain functions to establish that previously permitted mining and leaching sites located on TDC's property are environmentally safe. Certain broad-based guidelines were established in the above referenced correspondence in order for TDC to receive proper closure from the State of Arizona on these sites. Amongst these guidelines was either the relocation of old equipment and/or materials to a centralized storage yard and/or proper disposal. JABA, Inc., as consultant for TDC, is undertaking an evaluation of the used equipment and materials, and finds that much of it has minimal salvage value, and a point of diminishing returns would be reached quickly if these materials were moved to a centralized storage area. It has thus been JABA's position that most of the metal, including primarily steel with minor copper and aluminum be gathered and/or cut up into movable sizes, transported to Tucson, and sold as scrap metal.

JABA, Inc. has undertaken the solicitation of an estimate to have the scrap metal removed from TDC's property and disposed of in a proper recycling facility in Tucson. To this end, Mr. Jesse Grassman has submitted a proposal to undertake such work. Appended, JABA has penned a Letter of Understanding which shall memorialize the various parties intents if you both agree.

Sincerely,

Thomas E. Waldrip, Jr.

TEW/msb

Enclosure: Letter of Understanding.

Jerome Niedfelt, President Tombstone Development Co. Letter of Understanding November 8, 1993 Page ^N of 3

your made correction and sent under his

Fini I've put this together trub will you please review and see of there are any Changes that you then ik

then return and we weelget

Thank Jone

2 should encorporate.

eteat to Juny of Jene

Tom 11/12/93

LETTER OF UNDERSTANDING ENVIRONMENTAL CLEAN-UP

AS TO Tombstone Development Company (TDC):

TDC is owner of certain patented property upon which is scattered numerous pieces of equipment and scrap metal. TDC currently recognizes the ownership by other parties to certain pieces of this equipment. In other cases, certain pieces of equipment are believed salvageable for their designated and/or other use and are owned by TDC. TDC shall mark, or cause to be marked, such items believed to be in other party ownership or salvageable. Remaining metal equipment structures and scrap shall be considered waste metal. TDC wishes to have such waste metal removed and disposed of at a proper metal recycling center.

Mr. Jesse Grassman, an individual, hereinafter referred to as "GRASSMAN" has agreed to remove said waste metal and transport it to a proper metal recycling center under the following terms:

- All expenses including but not limited to labor, fuel, vehicles, insurance, cutting 1. torches and gas shall be born by GRASSMAN.
- GRASSMAN shall remove only such waste metal that is properly marked for disposal. 2. All other metal equipment, structures and scrap shall remain property of TDC.
- GRASSMAN shall neither be considered an employee of nor a contractor for TDC; 3. GRASSMAN's work shall be for his own benefit.
- GRASSMAN shall perform work in a workmanlike manner, using necessary care to 4. avoid injury to himself, the property, and others, and providing necessary fire suppression tools or equipment at all times.
- 5.
- 6.
- GRASSMAN shall provide copies to TDC of all receipts obtained for the sale of companies.

 GRASSMAN shall own all screen. 7.
- 8. TDC desires to have the metal recycled, but recognizes that GRASSMAN may have other uses intended. All benefit, including monies received from sale, shall be those of GRASSMAN. TDC makes no representation as to the usefulness or lack thereof, condition, salability or content of the scrap metal. The scrap metal is provided on an as-is, where-is basis.

Jerome Niedfelt, President Tombstone Development Co. Letter of Understanding November 8, 1993 Page ^N of 3

- 9. GRASSMAN represents that he is an employee of Geotemps, and is currently being used as contract labor by TDC for environmental clean up operations on the property. As such, GRASSMAN agrees to perform such salvage work independently of his contract with Geotemps and not in addition to such work. All such metal salvage work shall be performed after GRASSMAN has met his obligation on a daily or weekly basis for contracted labor with Geotemps by TDC.
- 10. GRASSMAN shall not be selective in his removal of scrap metal. All designated scrap metal shall be removed and the area cleaned up. TDC recognizes that at times because of conditions present, including various states of burial, widely scattered nature, etc., TDC may have to provide for contract services for extraction and/or collection of metal to a centralized area, such area then being designated as a scrap metal site, GRASSMAN then removing such scrap metal per the terms of this Letter of Understanding.
- 11. The parties hereto agree that this Letter of Understanding shall be effective as of the date of both parties acceptance below, and shall remain in effect until the first of the following events: 1) all scrap metal is removed; or 2) either party notifies the other in writing of a desire to terminate the arrangement.

The respective signatures below indicate the parties acceptance of the terms and conditions of this Letter of Understanding.

Dated this day of . 1993 Dated this day of . 1993

Dated this day of, 1993	Dated this day of, 1993
Ву	By
Jerome Niedfelt, President, TDC	Jesse Grassman "GRASSMAN"

Jerome Niedfelt, President Tombstone Development Co. Letter of Understanding November 8, 1993 Page ^N of 3

Southwestern Exploration Associates

COUNTY NOTEBOOK RESEARCH SYSTEM

CONSULTING SERVICES IN:

literature research
mineral exploration
geothermal exploration
geophysical exploration
multispectral aerial photography
space imagery search and retrieval
image enhancement and processing
remote sensing and interpretation
environmental studies

4500 E. Speedway, Suite 14 Tucson, Arizona 85712 (602) 795-6097

COUNTY NOTEBOOK INVENTORY LIST

Volume 1: County Summary Material

- 1. Mining District index map with USGS quadrangle overlay
- 2. County bibliography list with explanations
- 3. Target listing
- 4. Listing of all deposits with current exploration status
- 5. Map indexes to various commodities and a generalized land status map
- 6. County report by State Bureau of Mines
- 7. Information on industrial mineral occurrences within the county
- 8. General articles filed alphabetically, preceded by bibliography list
- 9. Metal price list

Volume 2: Thesis Material

- 1. Index map of available theses
- 2. Theses arranged alphabetically by author

Volume 3: U.S.G.S. Reduced Topographic Sheets

- 1. Reduced A.M.S. sheets
- 2. Reduced $7\frac{1}{2}$ and 15 minute quad sheets with list of mines located on each quad sheet

Volume 4: U.S.G.S. Geologic, Geophysical, Geochemical and Open File Maps

- 1. Index to maps in Volume 4
- 2. Geologic maps
- 3. Geophysical maps
- 4. Geochemical maps
- 5. Photo index maps

Volume 5: Mining District Notebooks

- 1. Mining district summary sheet
- 2. Mint records, mineral resources material, Weed's Copper Handbook (colored sheets separate these sections)
- 3. Mining district articles listed alphabetically
- 4. Bibliography
- 5. Mine summary sheets with geologic data
- 6. Land status