



2580 Creekview Road
Moab, Utah 84532
435-650-3866

July 2, 2025

Lucas West
State of Colorado
Division of Reclamation, Mining and Safety
1313 Sherman St., Rm. 215
Denver, CO 80203

RE: **P-2025-008** - Phoenix Minerals Inc - Stateline Exploration Project (Phase 1)

Dear Mr. Lucas West;

Phoenix Minerals Inc has received and reviewed your Notice of Deficiency dated June 24, 2025. On behalf of Phoenix Minerals Inc, Star Point Enterprises, Inc. respectfully submits this deficiency response with attachments to supplement the previously submitted Notice of Intent to Conduct Exploration for the Stateline Exploration Project (Phase 1):

1. The intended project target mineral resource is Copper, our NOI states "Poly Metals" to ensure there are no restrictions if other mineral resource are found and analyzed.
2. The BLM recommended reseeding plan with seed mix has recently been received and is attached to this letter, we are working with the BLM to update the seed mix to the industry standard of lbs./acre to minimize any confusion during reclamation.
3. Access is intended to be the minimal necessary to ensure the safe and successful completion of the project to reduce surface disturbance and maximize future reclamation. The 3,889 feet of proposed access and 1,797 feet of access maintenance would consist of a 12-foot travel surface within a 12-foot-wide disturbance corridor, with maximum grades of 8% to be maintained and no cut and fill slopes or topsoil striping anticipated. With that we would estimate less than five cubic yards of material moved for the project access use. We feel that five yards would give a safe buffer if some incidental blading had to occur at a minor ephemeral drainage or where a minor grade reduction may be necessary for the safe project ingress and egress. Previous operators placed large dead trees along the old tracks during their final reclamation. Our intent is to move them to the side for access and replace them during final reclamation.
4. No excavation is planned for the 60' x 40' staging area with only existing disturbance proposed for use. We have included this area in our disturbance estimates (0.055 acres) in the event any new disturbance is necessary for staging area use.

Thank you very much for your timely consideration of this application. Please feel free to contact myself at starpoint@etv.net or 435-650-3866 or Gavin Harrison – Project Manager at gavin@harrisonlandservices.com should you have any questions or require additional information.

Sincerely,

Don Hamilton

Don Hamilton – Permitting Agent, Phoenix Minerals Inc

cc: Lyle Thorne, Phoenix Minerals Inc
Gavin Harrison, Phoenix Minerals Inc

Pinyon-Juniper Reclamation Seeding Recommendation

For the Stateline Notice for Exploration Project

Tres Rios Field Office - Colorado

Prepared by: Ryan Schroeder, PhD Rangeland Management Specialist

Date: 6/17/2025

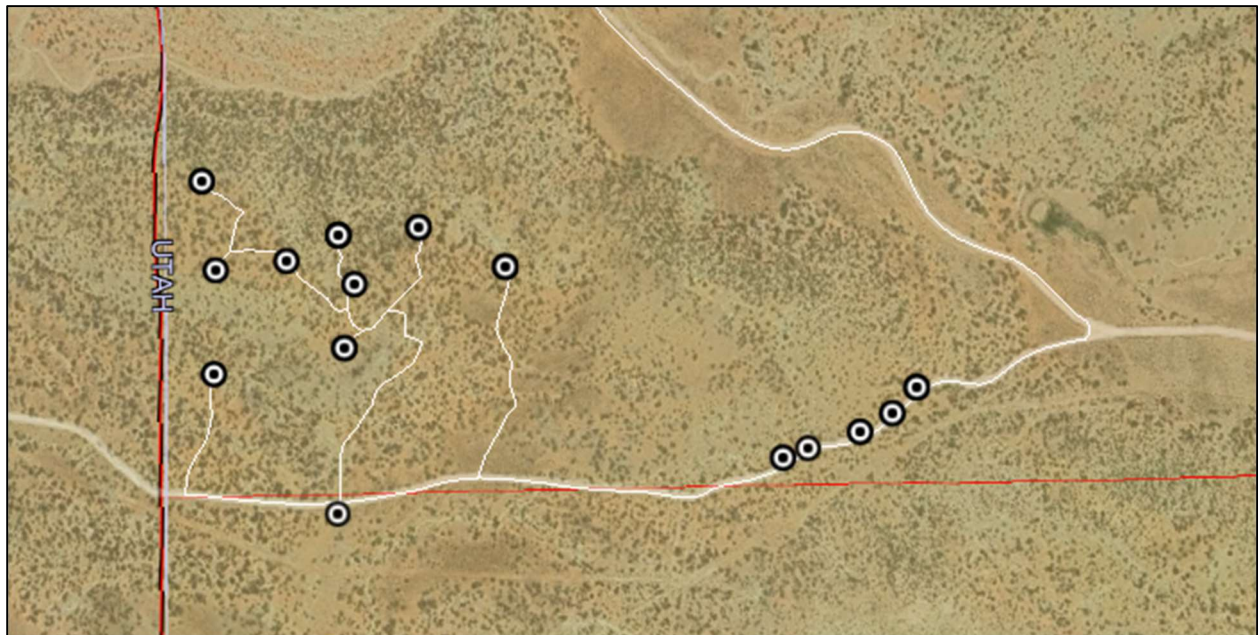
Project: 14 exploratory drill pads with associated access routes in a Mountain-Pinyon Ecological Site to be re-seeded immediately following exploration activities.

Location: 38.103490° -109.038996° (**Map 1**); elevation: 6,400 – 6,600 ft; south of San Miguel County Lisbon Valley Rd also known as County Road 4R, all sites are within 750 meters of the Colorado-Utah state line. The project is in the northwest portion of the Slickrock Grazing Allotment about 1 mile north of McIntyre Canyon.

Extent: 2.39 acres (9,672 m²) of dispersed, non-continuous disturbance. Estimated surface disturbance includes spot segment road maintenance along BLM designated 4026 (12 foot wide) for 1,797 feet (0.495 acres) and approximately 3,889 feet (1.071 acres) of proposed access (12 foot wide). Estimated surface disturbance includes the surface disturbance at the fourteen drill hole sites estimated at 60ft x 40ft (0.771 acres) with sumps and the proposed 60ft x 40ft staging area (0.055 acres).

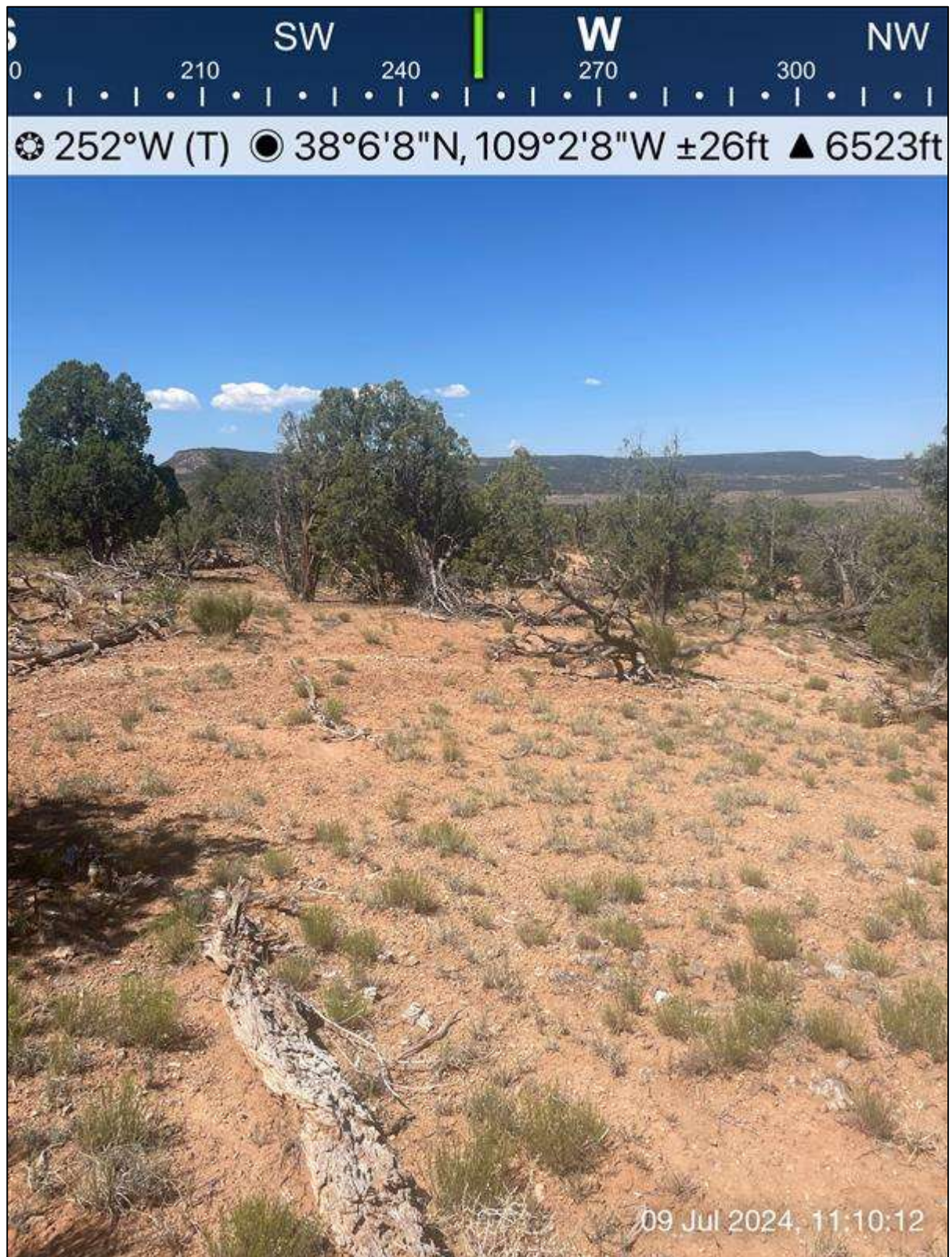
Desired Outcomes: Establish 10 – 25 native perennial plants (mix of herbaceous and woody species) per square meter in disturbed areas to resist soil erosion and site invasion by non-native invasive annual grasses and forbs. Thus, establish between 96,720 – 241,800 perennial plants across the disturbance area.

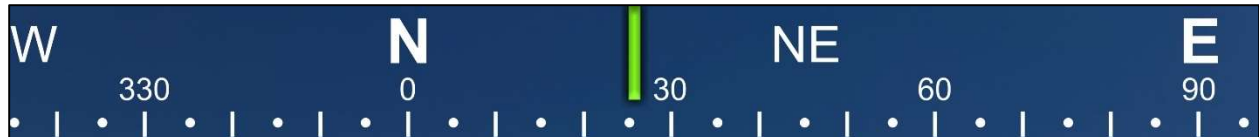
Map(s):



Map 1: Proposed area of exploration in San Miguel County on BLM TRFO managed public lands. White and black circles are proposed exploratory drilling locations, off-white linear features are proposed access routes.

Photos (pre-disturbance):





☀ 26°NE (T) ● 38°6'13"N, 109°2'18"W ±114ft ▲ 6527ft



09 Jul 2024, 11:29:49



☀ 190°S (T) ☉ 0°0'0"N, 0°0'0"E ▲ 0ft



Species Name	Common Name	Percent of seed mix	Desired Rate (PLS/m2)	Seeds per lb	PLS Seeds per	Germination	Purity	PLS Percent	Rate (PLS	lbs/acre
					sq. m @ 1 lbs					
					per acre	Percent	Percent		lbs/acre)	bulk-seed
Achnatherum hymenoides	Indian ricegrass	10	100	161920	40.01	100.00	100.00	100.00	2.50	2.50
Bouteloua gracilis	blue grama	10	100	724400	179.00	100.00	100.00	100.00	0.56	0.56
Elymus elymoides	bottlebrush squirreltail	15	150	192000	47.44	100.00	100.00	100.00	3.16	3.16
Poa secunda	Sandberg's bluegrass	15	150	1046960	258.70	100.00	100.00	100.00	0.58	0.58
Sporobolus cryptandrus	sand dropseed	15	150	5600080	1383.76	100.00	100.00	100.00	0.11	0.11
Cleome serrulata	Rocky mountain beeplant	10	100	64000	15.81	100.00	100.00	100.00	6.32	6.32
Hedysarum boreale	Utah milkvetch	8	80	46313	11.44	100.00	100.00	100.00	6.99	6.99
Heterotheca villosa	Hairy false goldenaster	8	80	336500	83.15	100.00	100.00	100.00	0.96	0.96
Penstemon palmerii	Palmer's penstemon	5	50	586088	144.82	100.00	100.00	100.00	0.35	0.35
Amelanchier utahensis	Utah serviceberry	2	20	25800	6.38	100.00	100.00	100.00	3.14	3.14
Purshia tridentata	antelope bitterbrush	2	20	17193	4.25	100.00	100.00	100.00	4.71	4.71
Total		100	1000						29.4	29.4
	Acres	2.39							70.20495382	70.2049538