

TEST PLOT PROGRAM

No Aqua Mine Permit No TA005RE:

for:

IMERYS PERLITE USA INC. (IMERYS)
NO AGUA FACILITY
7.5 MILES NORTH OF TRES PIEDRAS
39360 HWY 285, TAOS COUNTY
TRES PIEDRAS, NM 87577
719-376-5484

Prepared by:



**1140 Valley Forge Road
Phoenixville, PA 19460
Montrose Project # 052753**

December 19, 2025



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Revegetation/Test Plot Program

Montrose has reviewed information from prior test plot programs. An additional test plot program will be implemented with an emphasis on vegetation selection and varied soil depth. Appendix F is a matrix of seed mixes for the test plot program. A Montrose staff registered Landscape Architect reviewed the seed mixes for accuracy with the existing ecosystem. Appendix F contains both proposed seed mixes for testing. It is recognized that seed mixes are subject to material availability and substitutions may be necessary in the event that selected plant material is not available.

Montrose recommends two test plots to be constructed and monitored based on the following criteria:

Test Plot #1 – Flat Grade Condition: Plot will be located on a ‘flat’ topological grade (less than 3:1 slope). The test plot will be divided into four (4) quarter acre sized sub-plots. Each sub-plot will use a single seed mixture.

Test Plot #2 – Steep Slope Condition: Plot will be located on a ‘steep slope’ topological grade (3:1 slope). The test plot will be divided into four (4) quarter acre sized sub-plots. Each subplot will use a single seed mixture. The test plot will have a 200 ft width, perpendicular with the grade.

Both test plots will have the following sub-plot configuration:

- Sub-Plot 1: 6-inch borrow soil depth; Seed Mix #1
- Sub-Plot 2: 6-inch borrow soil depth; Seed Mix #2
- Sub-Plot 3: 12-inch borrow soil depth; Seed Mix #1
- Sub-Plot 4: 12-inch borrow soil depth; Seed Mix #2

Plant Material - Seed mixes were selected to reflect native species appropriate to site conditions and anticipated post-mining land use. Seed mix composition is provided in Appendix F. An Imerys seed mix and El Grande seed mix (from a neighboring facility) are proposed for testing.

To supplement the herbaceous seed mixes, shrub establishment will be evaluated. Shrub testing will include the New Mexico Locust (*Robinia neomexicana*), a native species known for its ability to improve soil fertility through nitrogen fixation. The inclusion of New Mexico Locust is expected to enhance soil quality, support ecological succession, and provide habitat and resources for wildlife, contributing to the overall ecological restoration of the area. The success of the New Mexico Locust or similar shrub would also reduce any potential stormwater erosion.

Soil Specifications – The soil used for the test plots will be obtained from an on-site borrow area. Each test plot will have two of the quarter acre sub-plots contain a soil depth of six inches. The remaining two sub-plots will have one-foot soil depth. Borrow soil will be applied over a loose, recently disturbed surface (~1-foot depth) and then harrowed (or disc) to incorporate existing soil.

On-site soil proposed for use on the test plots and mine cap will be tested by a soil scientist. The soil scientist will provide a soil report regarding soil viability. Soil viability will determine the usage of any amendments to the soil, and any recommendation may be applied to strengthening the intended success of the test plot program.

Soil depths subject to change per on-site stockpile availability.



Seed Dispersion Method – There will be one method for dispersing seed mixes on the test plots drill seeding. Drill seeding will result in better contact with the soil, which should help create an evenly dispersed mix within the test plots. Drill seeding should also reduce seed loss by preventing loss of seeds on the surface. All seeding will be conducted during the spring growing season to maximize germination potential and ensure the highest probability of successful plant establishment.

Construction Timeline and Life Span - The construction of the test plots will average around 2 to 3 weeks, and will involve on-site equipment to move material. The test plot areas will be prepared by using a dozer with a ripper to create a loose subsurface (roughly 1-foot depth). The Size and shape of test plots may vary due to the nature of the testing areas, but will maintain the designated required sizes. Test plots and sub-plots will be clearly delineated using durable, long-term markers such as steel T-posts. Following construction, an As-Built Construction Quality Assurance (CQA) Report will be submitted to MMD documenting construction methods, equipment used, and final plot layout.

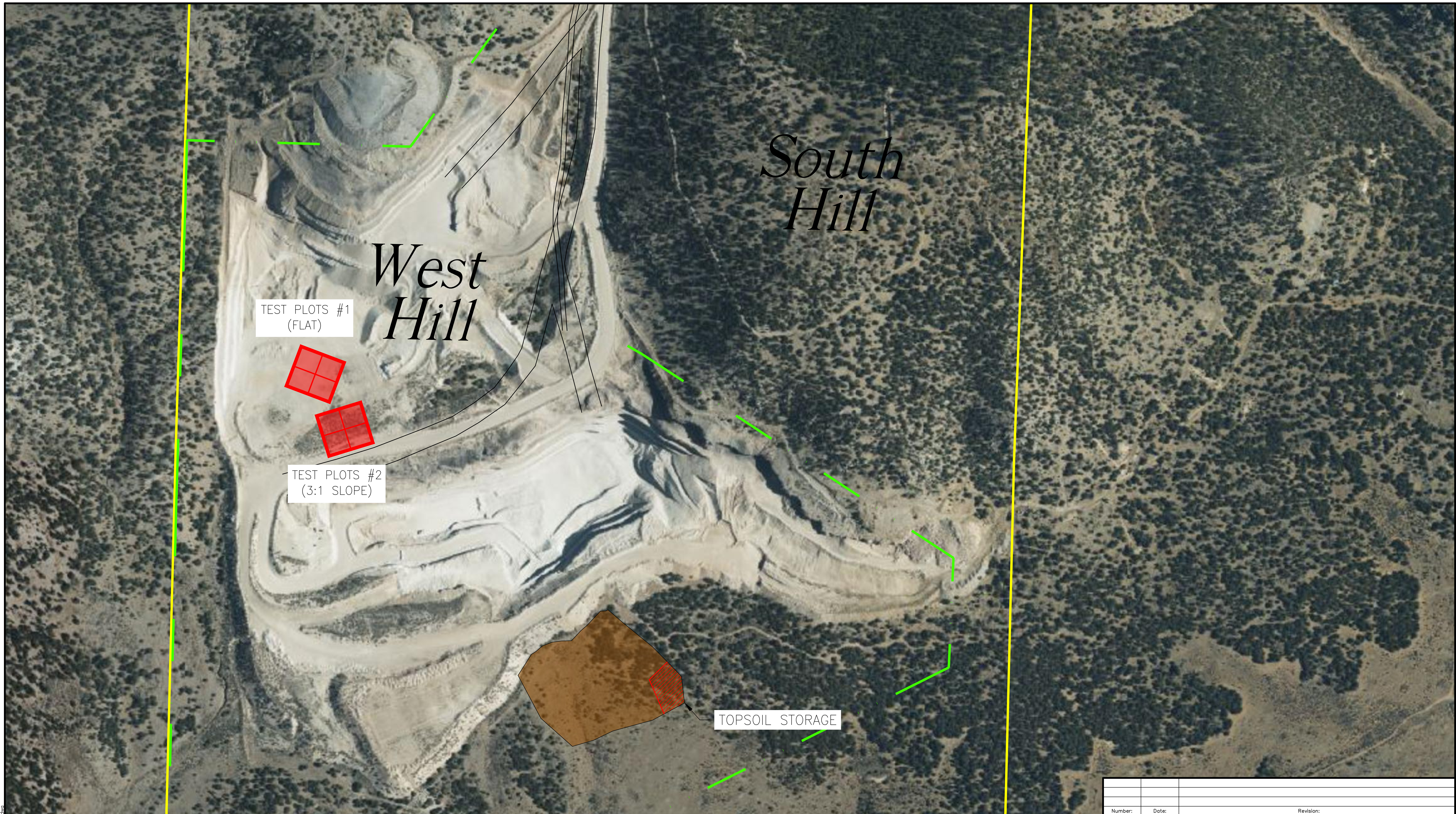
Monitoring and maintenance measures of the test plots may include using temporary wildlife deterrents (e.g., noise devices, non-toxic repellents), supplemental irrigation during initial establishment, (if necessary), and erosion control repairs, as needed.

The expected test plot lifespan of the test plot program will span roughly 7 years or if test exceed standards. Routine testing will occur at years 3, 5, and 7.

Testing Method - The testing method will include random transects, with the size of the transect to be 50 ft in length. No testing will occur in the first two years to allow for adequate vegetation coverage to establish. The mine has an obligation to have a 75% coverage (507) and 90% coverage (508). Monitoring results will be documented. Results will be used to evaluate revegetation performance and, if necessary, to refine seed mixes, soil depths, or seeding methods through adaptive management

Attachments

Appendix A
Proposed Test Plot Exhibit



South Hill

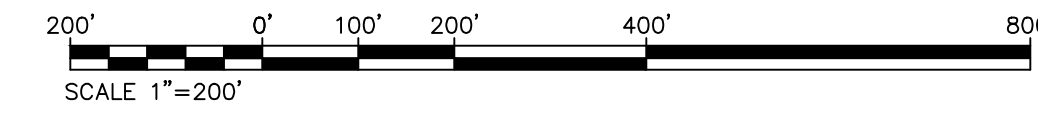
West Hill

TEST PLOTS #1
(FLAT)

TEST PLOTS #2
(3:1 SLOPE)

TOPSOIL STORAGE

- LEGEND**
- PROPOSED TESTPLOT
 - SUBPLOTS
 - BORROW MATERIAL SOURCE



| | | |
|---------|-------|-----------|
| Number: | Date: | Revision: |
|---------|-------|-----------|

IMERY'S PERLITE USA, INC - NO AGUA MINE
 150 EAST MAIN, SUITE 320 FERNLEY, NEW MEXICO 89408
 PERLITE, TAOS COUNTY

PROPOSED TEST PLOT EXHIBIT



MONTROSE ENVIRONMENTAL SOLUTIONS, INC.
 9100 2ND STREET NW, SUITE 200
 ALBUQUERQUE, NEW MEXICO 87114-1664
 T: 505.830.9680 montrose-env.com

| | |
|------------------|------------|
| Scale: | 1" = 200' |
| Drawn By: | KDC |
| Checked By: | RM |
| Project Mgr.: | AD |
| Originated By: | RBP |
| Project No.: | 052753 |
| Drawing Date: | 08/08/2025 |
| Sheet No.: | 1 OF 1 |
| Revision Number: | 0 |

EXHIBIT 1

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Appendix B
Imerys Seed Mix and El Grande Seed Mix

Imerys No Agua Seed Mix

| Species Name | Common Name | Plant Form | Broadcast Rate (lbs/acre) |
|-------------------------------|--------------------------|------------|---------------------------|
| <i>Sphaeralcea coccinea</i> | scarlet globemallow | forb | 0.3 |
| <i>Artemisia frigida</i> | fringed sagebrush | forb | 0.08 |
| <i>Lupinus argenteus</i> | silvery Lupine | forb | 3 |
| <i>Penstemon strictus</i> | Rocky Mountain penstemon | forb | 0.3 |
| <i>Elymus elymoides</i> | bottlebrush squirreltail | grass-Cool | 3 |
| <i>Elymus trachycaulus</i> | slender wheatgrass | grass-Cool | 3 |
| <i>Hesperostipa comata</i> | needle and thread | grass-Cool | 2.25 |
| <i>Muhlenbergia montana</i> | mountain muhly | grass-Cool | 0.38 |
| <i>Achnatherum hymenoides</i> | Indian ricegrass | grass-Warm | 3.75 |
| <i>Bouteloua gracilis</i> | blue gramma | grass-Warm | 0.8 |
| <i>Amelanchier utahensis</i> | Utah serviceberry | shrub | 1.5 |
| <i>Ericameria nauseosa</i> | rubber rabbitbrush | shrub | 0.38 |
| <i>Vicia americana</i> | American vetch | Legume | 1.5 |

20.24

El Grande Mine Seed Mix

| Species Name | Common Name | Pure Seed% | Total Viable% | Origin: |
|--|------------------------------------|------------|---------------|---------|
| <i>Pascopyrum smithii</i> | Western Wheatgrass 'Rosana' | 34.65% | 95.00% | WY |
| <i>Atriplex canescens</i> | Fourwing saltbush | 14.37% | 97.00% | NM |
| <i>Rosa woodsii</i> | Woods Rose | 13.52% | 83.00% | UT |
| <i>Bouteloua curtipendula</i> | Sideoats grama 'El Reno' | 11.75% | 86.00% | NE |
| <i>Dalea purpurea</i> | Purple Prairie Clover | 4.96% | 93.00% | WA |
| <i>Linum lewisii</i> | Wild Blue Flax | 4.31% | 96.00% | WY |
| <i>Bouteloua gracilis</i> | Blue grama 'Lovington' | 3.73% | 94.00% | CO |
| <i>Penstemon strictus</i> | Rocky Mountain Penstemon 'Bandera' | 1.84% | 85.00% | CO |
| <i>Sphaeralcea munroana</i> | Munro's Globemallow | 1.74% | 84.00% | UT |
| <i>Ratibida columnifera</i> | Prairie Coneflower | 1.67% | 98.00% | OR |
| <i>Achillea millefolium</i> | Western Yarrow | 0.58% | 73.00% | WA |
| <i>Artemisia tridentata</i> | Big Sagebrush | 0.49% | 81.00% | UT |
| <i>Sporobolus cryptandrus</i> | Sand Dropseed | 0.40% | 92.00% | CO |
| <i>Elymus elymoides</i> ssp. <i>Californicus</i> | Toe Jam Creek Germplasm | 0.38% | 96.00% | WA |
| <i>Artemisia frigida</i> | Fringed Sage | 0.36% | 91.00% | WY |