HYDROGEOLOGIC ASSESSMENT REPORT: LUCK SALUDA

NEAR INTERSECTION OF DOUBLE BRIDGES ROAD AND HEATHER LANE SALUDA COUNTY, SOUTH CAROLINA

LUCK *STONE

Prepared For: Luck Stone Corporation P.O. Box 29682 Richmond, Virginia 23242

BLE Project Number J23-18886-01

September 7, 2023

6004 Ponders Court I Greenville, SC 29615 € 864.288.1265 (864.288.4330 > info@blecorp.com **BLECORP.COM**

September 7, 2023

Luck Stone Corporation P.O. Box 29682 Richmond, Virginia 23242

Attention: Mr. Bruce Smith Greenfield Development Manager

Subject: **Hydrogeologic Assessment: Luck Saluda Parcel Identification Number #174-00-00-006 Saluda County, South Carolina BLE Project Number J23-18886-01**

Dear Mr. Smith:

As authorized through our proposal dated January 27, 2023, Bunnell Lammons Engineering, Inc. (BLE) has prepared this Hydrogeologic Assessment Report (HAR) in association with the proposed Luck Companies aggregate quarry in Saluda County, South Carolina herein called *Luck Saluda*. The report herein provides information on local and regional hydrogeologic characteristics and potential impacts to groundwater elevations in the vicinity of Luck Saluda during the quarry operations.

If you have any questions concerning this report, please contact Timothy J. Daniel at (864) 288-1265.

Sincerely, **BUNNELL LAMMONS ENGINEERING INC.**

Project Geologist With JOHN DRWN Senior Engineer

George Losonsky, PhD Groundwater Modeler Losonsky & Associates, Inc.

 $09/07/23$ $8/5$ $8/9/07/23$

Registered, South Carolina #2385 Registered, South Carolina #27867

cc: Jeremy Eddy, P.G. - South Carolina DHEC, Mining Reclamation Clint Courson, CHMM – Hodges, Harbin, Newberry & Tribble Brant Lane, P.E. – Hodges, Harbin, Newberry & Tribble

6004 Ponders Court, Greenville, SC 29615 \bigcup 864.288.1265 \bigcup 864.288.4430 \bigcup info@blecorp.com

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1.0 INTRODUCTION

1.1 Background Information and Purpose

BLE has prepared this Hydrogeologic Assessment Report (HAR) on behalf of Luck Companies in association with the proposed aggregate quarry located approximately 5 miles northwest of Batesburg-Leesville in Saluda County, South Carolina (see **Figure 1**). BLE understands that Luck is considering the purchase of a portion of the property identified as Saluda County Parcel Identification Number #174-00- 00-006 located west of the intersection of Double Bridges Rd (SR-41-26) and Heather Lane in Saluda County, South Carolina (herein referred to as the "Site") for the purpose of developing the undeveloped tract of land or "greenfield" as an aggregate quarry. Parcel Identification Number #174-00-00-006 encompasses a total of approximately 478 acres while the Site of interest is an approximately 330-acre subdivided parcel of the aforementioned property. Approximately 95 acres of the proposed 330-acre Site is anticipated to comprise the extraction area of the proposed quarry.

The purpose of this HAR was to provide information on groundwater flow into the proposed mine pit area during dewatering and to simulate potential impacts on neighboring wells.

1.2 Completed Scope of Work

This HAR began with the development of a preliminary site conceptual model based on known or expected main features of geology, hydrogeology, mine pit location and development, and site-specific relationships between structural geology and groundwater flow. The preliminary site conceptual model was then utilized to develop field data collection needs for this assessment which included geologic, geophysical, and hydrogeologic information. Site specific data were then collected to further characterize the hydrogeologic system and the resultant data analyzed to refine the site conceptual model. A computer aided mathematical model prepared by Mr. George Losonsky with Losonsky & Associates, Inc. (L&A) using MODFLOW was employed to provide predictive simulations of future mine dewatering scenarios.

The subject field work was performed between March 2023 and July 2023. The scope of work performed, including site exploration and testing, consists of the following:

- Geophysical testing was performed across the proposed 95-acre extraction area to characterize discontinuities (i.e., fractures, joints, faults) in the underlying bedrock which may represent highconductivity groundwater conduits. THG Geophysics, Ltd. (THG) collected six (6) 2-dimensional Electrical Resistivity Imaging (ERI) profiles and eight (8) Very Low Frequency (VLF) profiles across the proposed extraction area (**Appendix C**).
- A DHEC 3736 Monitoring Well application was submitted by BLE on June 13, 2023 and approved by SCDHEC on June 16, 2023 (**Appendix D**)
- Rock core drilling was performed by others at ten (10) locations within or very close to the proposed extraction area in January and February 2023.
- Six (6) permanent groundwater wells (air rotary drilling) were installed within the proposed extraction area by BLE in June and July 2023 (**Figure 2**).
- A literature review and vehicular reconnaissance of the surrounding area within an approximately 0.5-mile radius of the Site was conducted in June and July 2023 to observe and evaluate

topographic fracture traces and lineaments, bedrock fracture orientations, public and private drinking water wells, and public surface water intakes (**Figures 4** and **5**).

- A Freedom of Information Act (FOIA) Request was submitted to identify public and private drinking water wells and surface water intakes within an approximately 0.5-mile radius of the Site.
- A variable rate drawdown test was performed in which a single well was pumped at rates ranging from 5 to 40 gallons per minute (GPM) for eight (8) hours (**Appendix E**).
- A constant rate drawdown test was performed in which a single well was pumped at 40 GPM for twenty-four (24) hours (**Appendix E**).
- A transient groundwater model was constructed by Losonsky & Associates, Inc. $(L&A)$ for the Site to provide predictive simulations of effects of future mine dewatering scenarios (**Figures 7** through **9** and **Appendix F**).

2.0 DESCRIPTION OF SITE

The Site is located in Saluda County, South Carolina off of Double Bridges Rd (SR-41-26), approximately 5 miles northwest of the town of Batesburg-Leesville, South Carolina (**Figure 1**). The Site consists of a portion of a parcel of land identified by Saluda County PIN #174-00-00-006. The parent parcel is approximately 485 acres while the subdivided portion of the parent parcel identified as the Site totals approximately 330 acres. Conceptual site drawings indicate the extraction area will occupy approximately 95 acres.

The Site is mostly undeveloped and has been used primarily for timber harvesting. A barn and a residential structure were developed on the property as late as 1951 and still exist on Site. Additionally, a network of unimproved dirt roads has been established.

2.1 Planned Quarry Operations

The planned mining operations will take place in the central portion of the Site, east of the 100-foot wetlands buffer that bisects the site delineated by Hodges, Harbin, Newberry & Tribble (HHNT) in a Delineation Concurrence Request (DCR) submitted to the US Army Corps of Engineers (USACOE) on May 23, 2023 (**Appendix A**). Current design plans for the site provided by Kennedy Consulting Services, LLC (KCS) indicate that the extraction area will be split into Phase 1 and Phase 2 and land to the west of the bisecting wetland will be used for overburden storage (**Appendix B**). The mine facilities and process plant will be located east of the proposed extraction area. A 50-foot undisturbed buffer will be maintained along the perimeter of the property boundary. . Vegetated berms will be constructed to the north, west, and the south of the proposed extraction area, and to the east of the mine facilities and process plant. The road entrance to the mine facility will be from the east, off Double Bridges Rd (SR-41-26) and will extend westward to the final process plant area east of the proposed extraction area.

The planned mining operations will begin with the excavation and removal of overburden and rock from the Phase 1 extraction area located in the central portion of the Site. Current site plans include quarry operations moving into Phase 2 of the site approximately 25 years after the opening of Phase 1.

2.2 Geology

The subject property is located within the Batesburg USGS Quadrangle and is in the Piedmont physiographic province. The Piedmont is characterized by rolling relief that generally slopes from northwest to the southeast, toward the Atlantic Coastal Plain physiographic province. Generally, soils in the Piedmont formed by the in-situ chemical weathering of the underlying bedrock. The typical residual soil profile consists of silty and clayey soils near the surface, where soil weathering is more advanced, underlain by micaceous sandy silts and silty sands. Residual soil zones are commonly referred to as "saprolite." Saprolite is usually sandy with large rock fragments and lesser amounts of silt and clay. The thickness of the saprolite in the Piedmont ranges from a few feet to more than 100 feet (*Hack, 1989*).

The site's natural topography consists of a series of northeast-trending, low relief hills and series of drainage features that slope gently towards Flat Rock Branch which bisects the Site, west of the proposed extraction area and ultimately flows into Clouds Creek west of the Site (**Figure 1**).

The Site is underlain by the Late Paleozoic-aged Clouds Creek pluton, bound to the north by the Asbill Pond Synclinorium and to the south by the Modoc Shear Zone, which follows the boundary between the Piedmont and Atlantic Coastal Plain physiographic provinces (**Figure 3**) (*Secor and others, 1986a*). The

Clouds Creek pluton was described by *Speer (1981)* as a composite body consisting of biotite and cordierite-biotite monzogranite and granodiorite. Texture and color vary within the pluton however, it is distinctly porphyritic throughout its western half and its northern end, with distinctive subhedral or round, blue-gray alkali feldspar megacrysts (*Overstreet, 1965*; *Speer 1981*).

Bedrock coring was performed by Subhorizon Geologic Resources, LLC (SGR) under contract with Luck Companies, LLC (Luck) at ten (10) locations selected by Luck within or very close to the proposed extraction area in January and February 2023. The depth to bedrock can vary even over short horizontal distances due to boulders, fractures, and joints. Therefore, the actual depth to continuous bedrock will vary across the site. The SGR coring locations are indicated on **Figure 2**. Survey data and drilling depths are summarized on **Tables 1** and **2**.

Jurassic aged diabase dikes intercepting the ground surface have been mapped by others within 20 miles of the Site (*Sutter, 1985*; *Bell, 1988*). No diabase dikes were identified at the surface of the Site; however, biotite- and chlorite-rich diabase dikes were identified by SGR at several coring locations and by BLE at five (5) of the six (6) groundwater well locations drilled in June and July of 2023.

Rock outcrops were observed along the drainage features and upland elevations at the Site. On the upland elevations, large boulders in excess of five (5) to ten (10) feet in diameter are also common. Rock outcrops which appeared undisturbed were used for the fracture trace analysis

2.3 Hydrogeology

Groundwater in the Piedmont usually occurs as unconfined, water-table aquifers in four primary geologic zones: 1) alluvial soils deposited in flood plains of streams and rivers; 2) residual soil (saprolite); 3) partially weathered rock; and 4) fractured bedrock. These zones are typically interconnected through open fractures and pore spaces. The configuration of the water-table aquifer generally resembles the local topography.

In the alluvial/residual soil and partially weathered rock zones, groundwater is stored within the pore spaces and is released to the underlying bedrock through gravity drainage. Plutonic rocks, such as the Clouds Creek granite, are composed of interlocking minerals and have little or no pore space to transmit groundwater. Therefore, groundwater within the bedrock zone occurs primarily in fracture voids. Generally, fractures within the bedrock are very small, but may extend to several hundred feet and may intersect other fractures forming complex, interconnected fracture networks.

Groundwater within the Piedmont generally moves from topographically high areas (recharge zones) to topographically low areas within and along stream valleys (discharge areas) (*Fetter, 2001*; *Freeze and Cherry, 1979; Feaster and Guimaraes, 2017*). Flat Rock Branch, and the other smaller, unnamed perennial and ephemeral tributaries that bisect portions of the site, are the expected discharge zones for the shallow aquifer.

2.4 Site Conceptual Model

The materials that comprise the unconfined Piedmont aquifer consists of the residual saprolitic soil, partially weathered rock, and fractured granitic bedrock. In the lower elevation areas, the thin alluvial sediments in the drainages also makeup a small portion of the water-table aquifer. These units are hydraulically connected and thus comprise a single unconfined aquifer, although recharge rates, flow rates and specific storage differ between the units based on the unique geologic conditions of each zone.

The generally accepted model for the Piedmont aquifers is a two layered system, built on the premise of an unconsolidated layer of soil and saprolite containing an unconfined aquifer that has a relatively high storage capacity supplying water to an underlying variably fractured crystalline bedrock aquifer that has low overall porosity and storage (*Heath, 1989*). The low overall porosity and storage are due to the dense, somewhat impermeable bedrock that yields water primarily from secondary porosity and permeability provided by fractures, faults, joints and foliations. The saprolite aquifer and bedrock fractures zone are common targets for private, public, industrial and irrigation water wells. It is important to emphasize that crystalline bedrock aquifers are irregular and heterogeneous in distribution, often highly localized, and exhibit discontinuous water bearing zones.

In summary, the local aquifer system can be conceptually simplified and viewed as a two-layered system consisting of a shallow, unconsolidated, unconfined, porous regolith water aquifer that can supply water to surface water features and to the second layer, the underlying fractured bedrock aquifer.

Infiltration of precipitation to recharge the water-table aquifer is primarily affected by rainfall intensity and duration, soil characteristics (lithology), pre-existing soil moisture conditions, temperature (evaporation), plant uptake (transpiration), and separation between ground surface and the unconfined water-table. Soil samples logged in the field were typically silty fine to coarse sands that graded coarser with depth. These soils indicate favorable recharge areas due to their typically high permeability.

Widespread groundwater elevation data was not available for the site during the duration of field activities. From our experience with similar geology, it is assumed that the configuration of the water-table surface is a subdued replica of the ground surface. Groundwater is assumed to discharge from the irregular saprolite to bedrock interface into the perennial Flat Rock Branch Creek. During heavy rainfall events or in months where recharge exceeds evapotranspiration, groundwater may discharge into ephemeral tributaries to Flat Rock Branch Creek.

3.0 WATER WELL INVENTORY

3.1 Freedom of Information Request

On Thursday, July 6, 2023, BLE submitted a Freedom of Information (FOI) request to the South Carolina Department of Health and Environmental Control (SCDHEC) via the FOI Office to review all available well records for Saluda County. On July 18, 2023, BLE received two (2) spreadsheets from FOI Assistant Director Kristen Keller saluda 1.xlsx, herein referred to as the legacy database, and saluda 2.xlsx, herein referred to as the active well database. The legacy database contained information containing well completion information between 1990 and 2005. SCDHEC did not require well permits prior to 2000; therefore, older nonpermitted wells installed between 1990 and 1999 were only given a log number.

The active well database has been in use since 2005. We understand the active well database only includes wells that have been reported to SCDHEC and should not be considered a complete inventory of all wells in Saluda County. Due to the size of the inventory provided by SCDHEC in the FOI request, the databases have not been included in this report however, they can be submitted electronically upon request.

Neither database identified any wells located within a 0.5-mile radius of the proposed extraction area when imported into Google Earth® via geocoding.

3.2 Regulatory Resources

A review of the SC Watershed Atlas website [\(https://gis.dhec.sc.gov/watersheds/\)](https://gis.dhec.sc.gov/watersheds/) did not identify the presence of Public Water Supply Wells (PWSW) or PWSW Protection Zones within a 0.5-mile radius from the proposed extraction area. The closest PWSW Protection zone is approximately 1.75 miles southwest of the extraction area and is attributed to Amicks Poultry (System 4130802). A public geodatabase published by Saluda County [\(https://saludacountysc.net/SaludaCountyViewer/\)](https://saludacountysc.net/SaludaCountyViewer/) showed water line infrastructure present along Spann Rd approximately 1.25 miles west of the proposed extraction area.

3.3 Site Reconnaissance

On July 17, 2023, BLE performed a vehicular reconnaissance of the neighboring properties adjacent to public rights-of-way that were within 0.5 mile of the proposed extraction area. Seven (7) suspected private drinking water wells were identified and are depicted on **Figure 4**. The closest well identified is approximately 1,750-feet east of the extraction area and is used by a private residence on Double Bridges Road (SR-41-26). Evidence of municipal water lines was observed (i.e., fire hydrants) along Spann Rd (SR-41-25).

4.0 FIELD METHODS

4.1 Geophysical Survey

While the Clouds Creek Granite is mentioned in several research papers (*Watson, 1909; Overstreet and Bell, 1965; Speer, 1981; Secor et., al. 1986a)*, significant fracture mapping had not been conducted within the granitic pluton. Due to the lack of historic information and the need to identify significant production wells, it was determined that geophysics would be helpful to identify the fractures which dominate the presumed dual porosity flow regime at the Site. For this project, BLE subcontracted THG Geophysics, Ltd. (THG) to collect eight (8) Very Low Frequency (VLF) profiles and six (6) 2-dimensional 2-D Electrical Resistivity Imaging (ERI) profiles across the approximately 95-acre proposed extraction area. Evaluation of the Site by THG was performed under the project name of "Confidential Site #1". The VLF survey was employed for imaging discrete fractures that propagate to the bedrock surface fractures in the immediate vicinity of the proposed extraction area, and ERI was utilized to further characterize fractures identified in the VLF data and provide estimates of bedrock resistivity.

The VLF survey utilizes very low frequency radio signals to measure electrical properties of near surface soil and shallow bedrock. Features such as fractures, joints, or fault zones are generally more electrically conductive than the surrounding crystalline bedrock (*Hutchinson et al., 2001*). Analysis of the contrasting electrical conductivity data collected via VLF can be used to characterize the subsurface and identify zones which may represent high-conductivity groundwater conduits.

THG collected data along eight (8) VLF profiles covering approximately 20,000 linear feet in a rectangular grid, as depicted on **Figure 2** within **Appendix C**. The profile locations and orientations were selected based on regional and local geologic information, information contained in boring logs prepared by SGR, as well as inferences made from field observations made by BLE in March and April 2023.

The VLF data were collected by walking a series of lines (i.e., profiles) with a backpack VLF receiver and stopping to collect data at points at consistent intervals along each line. The location of each data point along the profile is determined and recorded using a non-survey grade GPS. The VLF method is sensitive to cultural interference from items such as pipelines, utilities, fences, and other conductive objects. No such features were observed at the time of data collection. One, approximately 200-foot section of VLF data in profile 6 was corrupted during acquisition and was omitted from the report. According to the geophysics company THG, the data quality was suitable for use in subsurface characterization.

The ERI profiles were collected with a 3-meter step-out Schlumberger array, in which four (4) stainless steel electrodes are placed in a line around a common midpoint. The lines were designed to image approximately 300 feet below ground surface (**Figure 5** within **Appendix C**).

Following field data collection, the VLF and ERI data were post-processed. **Appendix C** contains the THG Geophysics report which includes figures illustrating the VLF and ERI profiles and the points along each profile where factures were imaged. The post-processed data are presented in both plan and cross-section view to illustrate the interpreted dip of the imaged fractures. The data were examined and utilized to make interpretations of the subsurface fracture patterns within the study area. The black lines depicted on **Figure 7, Appendix C** illustrate the interpreted location and orientation of the imaged fractures based on VLF data, with arrows depicting the dip direction of these features; the black points indicate interpreted fractures based on the ERI data.

Although the lines shown are straight and continuous, actual fracture patterns are not always linear and/or as laterally continuous as shown. Interpretations of fracture zones by THG may differ from those interpreted by BLE and L&A when identifying the placement of groundwater monitoring wells.

4.2 Geologic Field Mapping

Plutonic rocks, such as the Clouds Creek granite, are composed of interlocking minerals and have little to no pore space to transmit groundwater. Therefore, fractures are often the primary sources of permeability in crystalline bedrock aquifers. Locating bedrock fractures is one step towards identifying zones in the bedrock that may yield high quantities of groundwater (*Clark et. al, 1996*).

BLE geologists conducted two (2) days of geologic field mapping at the Site in June and July 2023 to collect fracture strike and dip measurements to support groundwater modeling efforts as well as overall trends in the structural geology. The fractures observed at the site typically occur as joints with rough planar surfaces and no discernable offset parallel to the fracture surfaces. Joints appear to be more closely spaced and more variably oriented within the proposed extraction area than in other areas of the Site. The dominant orientation of joints observed at the Site strike southeast and dip steeply to the southwest (**Figure 5**).

4.3 Well Installations

The locations of the observation and dewatering wells were selected based on the VLF and ERI geophysical survey findings, borings performed by SGR, and geologic field observations. The aforementioned well locations were selected with the purpose of intersecting communicative primary fractures and developing an observation well network to be used during pump tests for monitoring aquifer responses and estimating aquifer parameters. In selecting drilling locations, consideration was given to anticipated mining infrastructure placement and to the option of using one or more of the drilled wells as production wells for temporary mining operations. The location of pumping well *D-1* was selected based on conditions encountered in boring *IW-2* performed by SGR in January of 2023 and verbal communication from Luck personnel that IW-2 was observed to have artesian flow after drilling.

Well drilling targeted installation of the pumping well in primary fracture zones and installation of observation wells intersecting the same apparent fracture zone, but at some distance from the pumping well. Additional observation wells were installed to examine the influences of pumping in the aquifer system away from the fracture zone intersected by the pumping well. Given the dipping orientation of the fractures, this arrangement allowed for the possibility of a single fracture being intersected by two wells located along a line perpendicular to the trace of the fracture. This approach would provide an opportunity to measure hydraulic conductivity along the same fracture, the degree of hydraulic connection between parallel fractures, and test the conceptual site model.

On behalf of Luck, BLE obtained a well installation permit (Permit) from the SCDHEC Mining and Reclamation Program. The permit is included in **Appendix D**. BLE notified SCDHEC of the schedule for these field activities, as required by the Permit.

Drilling and well installation activities were performed between June 19 and July 3, 2023. Austin Drilling & Well Repair, Inc., South Carolina licensed well drillers, performed the well installations. BLE provided the services of a South Carolina licensed geologist to observe the field activities. A registered land surveyor from Wellston Associates Land Surveyors, LLC of Warner Robins, Georgia performed the approximate asbuilt surveying after completion of the drilling activities. The approximate as-built survey data can be found in **Table 1**.

One (1) pumping well (D-1) and five (5) observation wells (O-1, O-2, O-3, O-4 and O-5) were installed in bedrock at the site, with depths ranging from approximately 301.8 feet to 405.0 feet below ground surface (bgs). The borings were performed using a Schramm T450WS truck-mounted drill rig, employing a combination of mud- and air-rotary drilling techniques in soil and bedrock. Where competent rock was encountered, a 7.5-inch OD down-hole pneumatic drill-hammer was used to advance the borehole into bedrock. The pneumatic drill-hammer advanced through the subsurface materials by rapidly striking the rock while the drill pipe was slowly rotated. The drill hammer was constructed of alloy steel with tungstencarbide inserts that provide the chipping or cutting surfaces. An in-line oil coalescing filter was attached to the air compressor on the rig to prevent oil contamination in the borehole.

Bedrock was encountered at a range of depths from 26 to 67 feet below ground surface (average 48 feet). In general, the bedrock encountered became more competent with depth. The depth to bedrock will vary over short horizontal distances due to boulders, fractures, and joints. Therefore, the actual depth to continuous bedrock will vary across the site. Based on the drill cuttings, the bedrock encountered consisted primarily of severely weathered to fresh, medium to coarse-grained, granite. Diabase dike(s) were encountered at all but one (1) groundwater well location (O-5). In contrast to the thin diabase dike(s) encountered by SGR, those encountered during well installation activities ranged from 13 to 29 feet thick at O-1 and O-2, respectively. Individual boring logs which contain more detailed descriptions are presented in **Appendix D**.

The wells consist of 6.25-inch internal diameter polyvinyl chloride (PVC; Johnson Schedule 40, NSF-rated) casing with welded joints that extended from less than three feet above grade to the top of bedrock. A hydrated bentonite seal was installed at the soil-bedrock interface to prevent surface water infiltration. The well annulus was grouted with a high solids bentonite grout to the ground surface. A 4-inch diameter PVC inner well casing was installed into bedrock to prevent formation material from falling into the well, the bottom 20-foot section of which is a manufactured well screen with 0.010-inch-wide machined slots. The surface completion of each well consisted of an approximately 2-foot tall, yellow-painted PVC stickup and a locking, expandable well cap. Gravel was spread at the ground surface to at least the width of the annular space to increase footing and structural stability of each well, per SCDHEC R.61-71 Well Standards. Each well was constructed with a vent hole in the PVC casing near the top of the well. A well identification tag was secured to each stick up with its corresponding well number and construction details.

The locations of the wells are indicated on **Figure 2**. Survey data and drilling depths are summarized on **Tables 1** and **2**. **Table 3** summarizes the dominant water bearing fracture zones recognized during drilling of monitoring wells.

Water Well Records (SCDHEC Form 1903) are included in **Appendix D**.

4.4 Aquifer Pump Testing

4.4.1 Variable Rate (Step) Test

BLE conducted a variable flow rate pump test (step test) on the pumping well (D-1) on July 6, 2023 to estimate the target flow rate for the constant rate aquifer pumping test. A FloWise P55S75 4-inch diameter, 7.5-horsepower submersible electric pump rated at a maximum flow rate of 75 gallons per minute (gpm) was installed on a 2.0-inch internal diameter NPT galvanized pipe and positioned at a depth of approximately 235 feet bgs. A 2-inch diameter flow meter and flow control valve were installed on the discharge line. BLE installed a Seametrics PT2X® pressure transducer/datalogger into the pumping well at a depth of 200 feet bgs to collect height of water column data during the step test, from which drawdown

levels were calculated. A Seametrics BaroSCOUT2X® barometric pressure sensor was deployed in a shaded area near the pumping well to barometrically compensate the absolute pressure sensor for water level measurements.

The pumping rates selected for the step test were 5, 10, 25, 35, and 40 gpm based on field observations and approximate water yields estimated during well installations. The step test began with an initial pumping rate of 5 gpm, which was maintained using the flow control valves. The pump was operated at 5 gpm for fifteen minutes, during which the change in drawdown in the pumping well became asymptotic. Approximately fifteen minutes after starting the test, the pumping rate was increased to 10 gpm and maintained at this rate for thirty minutes, during which the change in drawdown in the pumping well became asymptotic. After thirty minutes of pumping at 10 gpm, the pumping rate was increased to 25 gpm and maintained at this rate for approximately seventy-five minutes. Approximately two hours after starting the test, the pumping rate was increased to 35 gpm and maintained at this rate for seventy-five minutes, during which the change in drawdown in the pumping well became asymptotic. During this step, changes to the pumping well drawdown once again became asymptotic. After seventy-five minutes of pumping at 35 gpm, the pumping rate was further increased to 40 gpm. After approximately 5 minutes, drawdown increased significantly. After approximately 10 minutes, the changes in drawdown had leveled out. The pumping rate was maintained at 40 gpm for forty-five minutes, during which the change in drawdown in the pumping well became asymptotic and therefore the pump was deactivated and the step test was terminated.

The drawdown data collected and recorded by the transducers was analyzed following the test. Based on an analysis of the flow rate employed and drawdown data obtained, a target flow rate of 40 gallons per minute was selected for the constant rate pumping test.

A chart depicting the pressure transducer data collected at pumping well D-1 during the step test is included in **Appendix E** and maximum drawdown is reflected in **Table 5**.

4.4.2 Constant Rate Pumping Test

From July 7 through July 8, 2023, a constant rate pumping test was performed using well D-1 as the pumping well and wells O-1, O-2, O-3, O-4, and O-5 as observation wells. This test was configured and conducted in a similar manner to the step test, though the pumping rate would be constant at 40 gpm. The same FloWise P55S75 4-inch diameter, 7.5-horsepower submersible electric pump was installed on a 2.0 inch internal diameter NPT galvanized pipe and positioned at a depth of approximately 235 feet bgs was used for the constant rate pump test. The flow control device and flow meter utilized during the step test were employed during the constant rate test.

Prior to beginning the pump test, BLE deployed Seametrics PT2X® pressure transducers in the pumping well (D-1) and the five (5) observation wells (O-1, O-2, O-3, O-4, and O-5). These transducers were set to record height of water column data during the pump test, from which drawdown levels were calculated. A Seametrics BaroSCOUT2X barometer was again deployed to barometrically compensate the absolute pressure sensors for water level measurements. In addition to transducer data, manual water level readings were collected from each of the three observation wells during the test. **Table 4** provides a summary of the transducer types, locations deployed, and logging intervals utilized.

The pumping phase of the constant rate pumping test lasted approximately 24 hours. The pump rate was held generally constant throughout the test at 40 gpm, with a total of approximately 56,990 gallons pumped from the well during the pumping portion of the test.

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After the test was completed and the pump was deactivated, the transducers in each of the wells continued to record data during the aquifer recovery phase, to monitor post-pumping water levels responses at the pumping and observation wells. On July 10, 2023, the transducer logging was terminated and the transducers were removed from the wells. No rainfall events occurred within 24-hours prior to or during the constant rate pump test. Charts depicting pump test drawdown data collected are included in **Appendix E**.

5.0 PUMP TEST ANALYSIS AND MODEL CONSTRUCTION AND CALIBRATION

5.1 Conceptual Model Design

The planned mining activities will be comprised of two phases of mine pit development: Phase I and Phase II (**Figure 2**). In Phase I, approximately 25 percent of the mine pit area will reach a depth of 250 feet after 25 years (+/- 5 years) when accounting for a series of 50-foot lifts and 90-foot wide travel ways. After approximately 25 years, mining will expand north into Phase II for an additional 48 years (+/- 5 years) until approximately 50 percent of the combined Phase I and Phase II area will be at a depth of 250 feet. The mine will have reached approximately 250 ft depth approximately 73 years (+/- 5 years) after the start of mining. The final step of the conceptual model occurs after approximately 105 $(+/- 5$ years) when the bottom of the pit reaches approximately 400 feet in depth.

5.2 Numerical Modeling of Pump Test

The analysis of drawdown curves obtained during the constant rate pumping test accounted for the discrepancies in distance-drawdown relationships among the observation wells. Complete simulation of the entire test in a single numerical model is not feasible for two reasons:

- VLF fracture data was not verifiable at depth. Dip angles and, at some locations, dip directions were ambiguous.
- Rose diagrams of hundreds of fractures measured in and around the pumping test area suggested the presence of multiple generations of major and minor fracture sets with orientations ranging from northwest-southeast to essentially east-west.

Instead, two (2) sets of hydraulically related wells were calibrated separately in single-layer numerical models using MODFLOW. The first set focused on observation wells installed roughly following in an east-to-west alignment relative to pumping well D-1 (O-2, O-3, and O-5). The second set of hydraulically related wells comprises the two (2) far-field wells, O-4, and O-5.

Results of the numerical model can be found in **Appendix F**.

5.3 Analytical Modeling of Pump Test and Aquifer Parameters

Analytical curve matching of drawdown in each individual test well provided a representative range of values for aquifer parameters because the analytical drawdown curves simulated the magnitude and shape of the observed drawdown curves relatively well. The Theis solution for non-leaky unconfined aquifers was used to confidently select hydraulic conductivity and storativity values for the region (**Appendix F**).

Table 6 summarizes horizontal hydraulic conductivity, vertical hydraulic conductivity, and storativity values derived from the analytical and numerical simulations applied to the pumping test data. Notably, a unique anisotropy in the horizontal plane did not emerge from the pumping test evaluation. This reflects the wide range of fracture directions observed in field measurements, combined with the geophysical data. Assigning a preferred direction of horizontal anisotropy based on one set of fracture data is not justified, and the resulting drawdown ellipse would be non-conservative in the direction of the minor axis of the anisotropy ellipse. The horizontal conductivity in the east-west direction (Kx) therefore equals the horizontal conductivity in the north-south direction (Ky) in the regional model.

5.4 Groundwater Flow Model Design

5.4.1 MODFLOW

The groundwater modeling was performed using Groundwater Vistas MODFLOW Version 6.96. Groundwater Vistas MODFLOW is pre- and post-processor graphical interface program employing the United States Geologic Survey's (USGS) MODFLOW-2005 Version 1.11.00 code. The model code is based on the finite difference method of solving partial differential equations describing groundwater flow, as described in McDonald and Harbaugh (1988). MODFLOW-2000 is an update to the model code, described in Harbaugh et al. (2000) and Hill et al. (2000).

MODFLOW solves the groundwater flow equation by dividing the model domain into blocks, or cells, within which aquifer properties are assumed to be uniform. Vertically, the model can be subdivided into layers with variable thickness. Each cell is assigned a unique flow equation, and the resulting matrix of equations describing the model domain are calculated with a solver program over a series of time steps. The solver computes flow rate and cumulative volume balances for inflow and outflow at each cell at each time step.

In preparation for development of a regional model for the simulation of site and regional effects of the proposed mine dewatering, a three-dimensional groundwater flow model was developed and calibrated to the site-specific aquifer pumping test data. Use of a discretized model to evaluate site-specific variables was essential where specific fracture zones and pit configurations were be mapped. The pumping test calibration model simulated specific fractures over a domain limited to the area of the geophysical profiles and pumping test well locations. The purpose of the pumping test calibration model was to derive input parameters for the regional model simulations.

Following pump test calibration, an equivalent porous media (EPM) model was developed for the purpose of simulating specific phases of the proposed mining operations, over time. The EPM model applied aquifer parameters derived from the pumping test to a larger, more regional domain.

5.4.2 Model Domain, Layers, and Boundary Conditions

The model uses an approximately 23,000-foot (east-west) by 29,000-foot (north -south) rectangular grid with 100-foot by 100-foot cells in the x and y direction. The model uses two layers in the z direction interpreted as Layer 1 and Layer 2. Layer 1 extends from 0 to 60 feet below ground surface to simulate weathered residuum and rock based on the approximate casing depths in **Table 2**. Layer 2 extends from 60 to 500 feet below ground surface and simulates more competent rock with fractures. The hydraulic conductivity, storativity, specific storage (Ss), and specific yield (Sy) used in the model are shown in **Table 7.**

The model domain provided sufficient distance between the mine and the edges of the model to avoid significant impact of the boundaries on the mining simulations. General head boundaries were therefore applied at the edges of the model, with conductance values based on the horizontal component of hydraulic conductivity in each respective model layer. The model bottom was set as a no-flow boundary, below 500 feet depth.

Figure 6 depicts the grid, model domain, and perennial and ephemeral streams documented in HHNT's DCR and HUC-12 stream data obtained from the USGS for the HUC-12 Lower Clouds Creek subwatershed. The perennial streams identified in HHNT's DCR and the HUC-12 stream data are used as

constant head boundaries in the model. The perennial stream hydraulic conductivity was 0.1 feet per day and the model cells are 1 foot thick and 10 feet wide. Creeks have a threshold of 50 feet, which is the distance below the bottom of the creek at which the leakage rate becomes independent of the position of the water-table.

At the time of this report, the Site has not selected a discharge area for water extracted during pit dewatering. For this evaluation two (2) separate models were prepared. Model *D1* indicates no discharge of water from the quarry pit to surface streams and model *P4* indicates discharge to Sediment Pond SP-4 and the ephemeral stream detailed in HHNT's DCR (**Appendix A**) and the preliminary site layout prepared by KCS (**Appendix B)**.

A time-varying constant head boundary condition was applied to Phase 1 and Phase 2. This boundary condition allows a specified head to change gradually over time during a model stress period.

5.5 MODFLOW Model Results

The results of MODFLOW models *D1* and *P4* are shown for the three (3) time steps in **Figure 7** (25 years), **Figure 8** (73 years), and **Figure 9** (105 years). Contour intervals of 5 feet, 20 feet, 50 feet, 100 feet are visible where present.

The drawdown curves for the three (3) groundwater monitoring wells (MW-1, MW-2, and MW-3) outlined in BLE's August 17, 2023 report titled *Groundwater Monitoring Plan: Luck Saluda* are included in **Appendix F**. Anticipated dewatering rates can be found in **Appendix F**.

Drawdown is anticipated to be greater in the southeastern direction due to the lack of large perennial streams similar to Cloud's Creek and Flat Rock branch present west of the proposed extraction area. The radius of the cone of influence for dewatering was smaller in model *P4* as opposed to model *D1* due to the assumed discharge of water from the extraction area to an ephemeral stream in the northeastern corner of the Site.

5.6 MODFLOW Model Limitations

Both models P4 and D1 are limited by the availability of regional groundwater elevation data. No longterm water-table elevations for any of the surrounding private drinking water wells were available nor have the significant fracture zones identified during geophysics and drilling and shown in **Table 3** been verified to exist off site.

Perennial streams in the piedmont of South Carolina are typically "gaining" streams, meaning that groundwater is discharged to the streambed while ephemeral streams are typically "losing" streams meaning that surface water recharges the underlying aquifer (*Feaster and Guimaraes, 2017*). If significant impacts to stream baseflow are proven to be a direct result of mine operations, a qualified wetlands scientist may be retained to assess potential impacts and provide possible mitigation strategies. The results of model P4 shown in **Figures 7** through **9** are likely more realistic as they account for recharge of the water removed during dewatering to the regional model. The results of model D1 are likely exaggerated due to the model not having an equal water balance as the volume of water removed during dewatering is not recharged to the aquifer.

The estimated time to reach projected quarry depths and the footprint as currently provided to BLE in **Appendix B** are considered significant parameters to the model. If the proposed Site design changes or if the USACOE dissents from the DCR for the facility (**Appendix A**) then several of the model parameters may need updating.

The activities and evaluative approaches used in this scope of work are consistent with those normally employed for services of this type. Our services have been performed based on our understanding of the Site and the observations made during our work. Natural variations in the physical composition of the soil overburden and fractured bedrock and the resolution of the data collected limit both accuracy and precision of subsurface hydrogeologic predictions. The limitations apply to groundwater elevation, flow, and other intrinsic aquifer properties which results in some variability to groundwater models. Reassessment of the aquifer parameters and assumptions made in this model may be revisited at a later date if the conditions encountered during mine development and operation are found to differ substantially from those used in our evaluation.

6.0 CONCLUSIONS

BLE has completed this HAR of the approximately 330-acre Site located in Saluda County, South Carolina. This report is intended to provide estimates of local geologic and hydrogeologic conditions and to aid in making inferences as to the impact of mining activities on the identified private drinking water wells within 0.5 mile of the extraction area and local surface water features.

The results of this this HAR and the data included herein are the product of hydrogeological field testing, data analysis, and predictive numerical modeling, consistent with industry standards, performed by BLE and its subcontractors. The completed scope of work included activities such as VLF and ERI geophysics, geologic mapping, the installation of groundwater observation and pumping wells, drawdown testing, and finite-difference numerical modeling of anticipated groundwater drawdown as a function of time. Hydrogeologic input parameters of the numerical model were based on calibration of the drawdown testing results, aided by standard analytical evaluation for additional confirmation of the numerical model calibration.

This hydrogeologic assessment relied on a process that began with the development of a preliminary site conceptual model. The preliminary model was based on known or expected main features of geology, hydrogeology, mine pit location and development, and site-specific relationships between geologic structures and groundwater flow. The preliminary site conceptual model was utilized to develop field data collection needs for this assessment. Site specific data was collected for the purpose of further characterizing the hydrogeologic system and refining the site conceptual model.

A standard computer aided three-dimensional mathematical model was then employed to provide predictive simulations of effects of future mine dewatering scenarios. The model used conservative assumptions regarding aquifer properties and was consistent with standard best practice in numerical finite-difference modeling of flow in porous and fractured media. Dr. Losonsky modeled three future mine pit development scenarios. The Phase I pit scenarios involved the expansion and gradual dewatering of the Phase I pit down to a depth of 250 feet after 25 years (Scenario #1), and both the Phase I and Phase II pits down to 250 feet after 73 years (Scenario #2) from the beginning of mining operations. For the Full Mine Pit dewatering scenario (Scenario #3), both the Phase I and Phase II pits continue to expand and are gradually dewatered down to 400 feet after 105 years from the beginning of mining operations.

The model predicts a drawdown cone with irregular distribution, reflecting both the effects of surface water recharge and hydraulic conductivity consistent with the fracture systems directly measured at the subject site and imaged using geophysical tools. The drawdown cone is asymmetric with the western extent limited by perennial creeks within and just west of the property. The drawdown cone's eastern and northern reaches exhibit indentations reflecting perennial stream paths. Two alternative recharge conditions were modeled: model *D1* with no mining discharge water re-introduced into the subsurface, and model *P4* with Pond SP-4 kept full and discharge water allowed to infiltrate into the subsurface.

25-year Drawdown

After 25 years of operation of the Phase I pit, the regional model simulations predict a 50-foot drawdown cone of influence that is predominantly confined to the eastern two-thirds of the proposed mine property and extending up to one-quarter mile south of the property. The regional model simulations predict 20 feet of drawdown 0.2 mile east, 0.3 mile north, and up to 0.7 mile south of the property boundary after 25 years of operation.

73-year Drawdown

After 73 years of operation, the regional model simulations predict 50 feet of drawdown contained within the eastern property boundary with Pond SP-4 infiltration (P4 model) but extending up to 0.1 mile east of the property boundary if none of the discharge water is allowed to re-infiltrate. North of the property boundary, 50 feet of drawdown extends approximately as far after 73 years as 20 feet of drawdown extends after 25 years. South of the property boundary 50 feet of drawdown one third of a mile from the property boundary. After 73 years of operation, 20 feet of drawdown extends less than half a mile (approximately 0.4 mile) east and north of the property boundary, and just under one mile south of the property boundary. Drawdown after 73 years is essentially contained within the western property boundary.

105-year Drawdown

When the mine reaches 400-foot depth after 105 years of operation, 100 feet of drawdown is contained within the property boundary to the east and west and extends 0.1 and 0.2 miles north and south of the property boundary, respectively. The extent of 50 feet of drawdown after 105 years of operation depends on the presence of re-infiltration of discharge water. With re-infiltration (model *P4*) 50 feet of drawdown is contained within the northeast corner of the property but extends beyond the southeast corner of the property by approximately 0.15 mile. Without re-infiltration of discharge water, 50 feet of drawdown extends 0.2 mile beyond the eastern property boundary, up to 0.3 mile north of the boundary, and up to 0.5 mile south of the boundary after 105 years of operation. The extent of 20 feet of drawdown after 105 years of operation is similar in all directions from the property boundary to the extent after 73 years of mining.

Summary

For the scenarios analyzed, the drawdown cone is steep within the property boundary to the east and over an area extending up to 0.2 mile north and south of the property. Drawdown increases primarily in the first 25 years of operation and continues to develop within 0.2 mile from the property to the east and north of the property in the period between 25 and 73 years of operation. Beyond 73 years of operation, the drawdown cone remains essentially stable.

The steep drawdown cone at the edge of the property may limit potential impacts to surface waters and wetlands. If stream flow impacts are minimal, impacts to bed and bank wetlands should also be limited. Potential impacts to ponds and upland wetlands are estimated to be insignificant based on the results of our model. BLE understands that future mine operations will likely include reintroducing a portion of the groundwater extracted by dewatering into on-site sediment ponds and stream segments, which may lessen the stream flow impacts. If significant impacts to stream baseflow are proven to be a direct result of mine operations, a qualified wetlands scientist may be retained to assess potential impacts and provide possible mitigation strategies.

The activities and evaluative approaches used in this scope of work are consistent with those normally employed for services of this type. Our services have been performed based on our understanding of the Site and the observations made during our work. Monthly monitoring of groundwater elevations within the property boundary will be conducted pursuant to the procedures outlined in the report titled *Groundwater Monitoring Plan: Luck Saluda* prepared by BLE on August 17, 2023. Reassessment of the aquifer parameters and assumptions made in this model may be revisited at a later date if the conditions encountered during mine development and operation are found to differ substantially from those used in our evaluation.

7.0 REFERENCES

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TABLES

Groundwater Well & Core Hole Survey Information Luck Saluda - Hydrogeologic Evaluation Saluda County, South Carolina BLE Project Number J22-18886-01

NOTES:

1. TOC = Top Of Casing

- 2. D-1 and O-1 through O-5 were surveyed by Wellston Associates Land Surveyors, LLC] of Warner Robbins, GA, August 18, 2023.
- 3. Northings and Eastings are in FEET and are referenced to the State Plane Coordinate System Zone 3900 (South Carolina) and the North American Datum of 1983 (NAD 83).
- 4. Elevations are in FEET and reference the North American Vertical Datum of 1988 (NAVD 88).
- 5. TOC elevations provided by Wellston Associates for Observation and Dewatering Wells are approximate.

6. $N/A = Not\, Apple$

- 7. Bold wells and core holes are either in (or very close to) the proposed extraction area.
- 8. Rock coring was performed by Subhorizon Geologic Resources (SGR) in January and February of 2023.
- 9. Northings and eastings for core holes IW-1 through IW-10 performed by Subhorizon Geologic Resources, LLC (SGR) in January and February 2023 were collected using a handheld GPS unit (non-survey quality).

10.Approximate elevations for SGR core holes were extracted from a digital elevation model and reference NAVD88.

Groundwater Well Construction & Core Hole Details Luck Saluda - Hydrogeologic Evaluation Saluda County, South Carolina BLE Project Number J22-18886-01

NOTES:

1. Measurements are in FEET; elevations reference the North American Vertical Datum of 1988 (NAVD 88).

- 2. TOC = $Top\ Of\ Casing$
- 3. N/A = Not Applicable
- 4. I.D. = Internal Diameter

5. Bold wells and core holes are either in (or very close to) the proposed extraction area.

6. Rock coring was performed by Subhorizon Geologic Resources (SGR) in January and February of 2023.

Dominant Fracture Zones Encountered Luck Saluda - Hydrogeologic Evaluation Saluda County, South Carolina BLE Project Number J22-18886-01

NOTES:

1. Measurements are in feet; elevations reference the North American Vertical Datum of 1988 (NAVD 88).

2. Depths are in feet below ground surface.

3. GPM = Gallons Per Minute

Summary of Pressure Transducer Deployment During Constant Rate Pump Test Luck Saluda - Hydrogeologic Evaluation Saluda County, South Carolina BLE Project Number J22-18886-01

monitoring) N/A N/A N/A N/A N/A N/A Seametrics BaroSCOUT2X 30 psia 15 minutes

NOTES:

1. Measurements are in feet; elevations reference the North American Vertical Datum of 1988 (NAVD 88).

2. BTOC = Below Top of Casing

Summary of Maximum Drawdown Luck Saluda - Hydrogeologic Evaluation Saluda County, South Carolina BLE Project Number J22-18886-01

NOTES:

1. Maximum drawdown observed during the steady state pumping test at a rate of 40 gallons per minute.

Summary of Aquifer Parameters from Pumping Test Analyses and Simulation Luck Saluda - Hydrogeologic Evaluation Saluda County, South Carolina BLE Project Number J22-18886-01

NOTES:

1. Kx = horizontal hydraulic conductivity in the east/west direction

2. Ky = horizontal hydraulic conductivity in the north/south direction

3. $S =$ Storativity

4. $b =$ Aquifer thickness

5. $T =$ Transmissivity

MODFLOW Parameters Luck Saluda - Hydrogeologic Evaluation Saluda County, South Carolina BLE Project Number J22-18886-01

NOTES:

1. The specific yield of 0.0006 in Layer 2 is based on analytical interpretation of observation well O-1.

FIGURES

2

SALUDA, SOUTH CAROLINA

J23-18886-01

APPROVED BY: DRL JOB NO:

FIGURE

4

BUNNELL LAMMONS LUCK SALUDA
 EXECTED A LOCK SALUDA

SALUDA SOUTH CAROLINA LUCK SALUDA SALUDA, SOUTH CAROLINA

SALUDA, SOUTH CAROLINA

SALUDA, SOUTH CAROLINA

APPENDIX A Hodges, Harbin, Newberry & Tribble – Delineation Concurrence Request

Consulting Engineers

May 23, 2023

US Army Corps of Engineers Columbia Regulatory Office 2567 Essayons Way Fort Jackson, South Carolina 29207

Re: Luck Companies / Saluda Quarry Batesburg-Leesville, Saluda County, SC Delineation Concurrence Request HHNT Project Number: 4780-021

To Whom It May Concern:

On behalf of Luck Companies, Hodges, Harbin, Newberry & Tribble, Inc., (HHNT) is herein submitting the enclosed Delineation Concurrence for the above-referenced site. The study area for the project, henceforth referred to as Saluda Quarry, is a \sim 331.01-acre tract of land located to the west of Double Bridges Road and to the east of State Road S-41-26 in Batesburg-Leesville, Saluda County, South Carolina (Figures 1 & 2).

Attached please find all appropriate mapping and documentation of the project area and a GPS delineation map overlaid on an aerial photograph. It is the opinion of HHNT that all the U.S. Army Corps of Engineers (USACE) Waters of the United States limits have been identified and flagged within the project study area consistent with current jurisdictional guidelines. Furthermore, in HHNT's opinion, none of the delineated features could be considered isolated wetlands.

At your earliest convenience, we respectfully request that the attached Delineation Concurrence be processed for the subject property. Please contact us to schedule a field visit and for access to the property, if necessary. In advance, we thank you for your timely review of this project and if you should have any questions or require additional information, please do not hesitate to call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.

Brandon F. Smith, PWS Senior Environmental Consultant

BFS/MM/TW

cc: Bruce Smith *Encl. (6)*

U.S. Army Corps of Engineers – Charleston District - Regulatory Division **REQUEST FOR CORPS JURISDICTIONAL DETERMINATION (JD) / DELINEATION**

(For Jurisdictional Status and Identifying Wetlands and Other Aquatic Resources)

The Regulatory Division is now offering paperless/electronic documents as a primary means of accepting project submittals and responding to requests. While electronic submittals are preferred, we will continue to accept paper documents that meet our file requirements in order to accommodate those with limited computer access. Depending on the project location, requests should be submitted to the appropriate office below. Please visit https://www.sac.usace.army.mil/Missions/Regulatory/Electronic-Submittals/ for additional information on electronic submittals.

I. PROPERTY AND AGENT INFORMATION

A. Site Details/Location:

An accurate depiction of the review area must be provided (survey, tax map, **OR** GPS coordinates). Tax maps may only be used if the site includes the entire tax map parcel. *See the attached Checklist for information that should be submitted for a complete and proper submittal.*

B. Requestor of Jurisdictional Determination/Delineation *(if there are multiple property owners, please attach additional pages)* Name: Mark Williams **Example 2018 Company Name (***if applicable***):** Luck Companies **Luck Companies**

C. Agent/Environmental Consultant Acting on Behalf of the Requestor *(if applicable)***:**

 $\mathsf{Constant} \mathsf{Agent}$ Name: _Brandon Smith f_S , and f_S , a

Company Name: _Hodges, Harbin, Newberry & Tribble Inc. Address: 17 Park of Commerce Blvd. Suite 110, Savannah GA 31405 (912) 596-3743 (912) 596-3743 Email: bsmith@hhnt.com

II. REASON FOR REQUEST (check all that apply):

 \Box I intend to construct/develop a project or perform activities on this site which would be designed to avoid all aquatic resources.

 \Box I intend to construct/develop a project or perform activities on this site which would be designed to avoid all jurisdictional aquatic resources under Corps authority.

■ I intend to construct/develop a project or perform activities on this site which may require authorization from the Corps, and the Jurisdictional Determination would be used to avoid and minimize impacts to jurisdictional aquatic resources and as an initial step in a future permitting process.

 \Box I intend to construct/develop a project or perform activities on this site which may require authorization from the Corps; this request is accompanied by my permit application and the jurisdictional determination is to be used in the permitting process.

 \Box I intend to construct/develop a project or perform activities in a navigable water of the U.S. which is subject to the ebb and flow of the tide.

 \Box A Corps jurisdictional determination is required in order to obtain my local/state authorization.

 \Box I intend to contest jurisdiction over a particular aquatic resource and the request the Corps to confirm that jurisdiction does/does not exist over the aquatic resource on the parcel.

 \Box I believe that the site may be comprised entirely of dry land.

 \Box Other:

^{*}Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section

^{103, 33} USC 1413; Regulatory Program of the U.S. Army Corps of Engineers; Final Rule for 33 CFR Parts 320-332.
Principal Purpose: The information that you provide will be used in evaluating your request to determine whethe under the regulatory authorities referenced above.

mas merces in the Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public, and may be made available as part of a public notice as required by federal law. Your name and property location where federal jurisdiction is to be determined will be included in the approved jurisdictional determination (AJD), which will be made available to the public on the District's website and on the Headquarters USACE website.

Disclosure: Submission of requested information is voluntary; however, if information is not provided, the request for an jurisdictional determination cannot be evaluated nor can a jurisdictional
determination be issued. determination be issued. 1 *April 29, 2022*

III. TYPE OF REQUEST:

¹Delineation Concurrence (DC) – A DC provides concurrence that the delineated boundaries of wetlands on a property are a reasonable representation of the aquatic resources on-site. A DC does not address the jurisdictional status of the aquatic resources. (NOTE: A DC is generally the quickest type of standalone request for the Corps to review and process.)

²Approved – An AJD is defined in Corps regulations at 33 CFR 331.2. As explained in further detail in RGL 16-01, an AJD is used to indicate that this office has identified the presence or absence of wetlands and/or other aquatic resources on a site, including their accurate location(s) and boundaries, as well as their jurisdictional status. AJDs are valid for 5 years.

³Preliminary - A PJD is defined in Corps regulations at 33 CFR 331.2. As explained in further detail in RGL 16-01, a PJD is used to indicate that this office has identified the approximate location(s) and boundaries of wetlands and/or other aquatic resources on a site that are presumed to be subject to regulatory jurisdiction of the Corps of Engineers. Unlike an AJD, a PJD does not represent a definitive, official determination that there are, or that there are not, jurisdictional aquatic resources on a site, and does not have an expiration date.

⁴ "No Permit Required" (NPR) Letter- A NPR letter may be provided by the Corps to notify the requestor that an activity will not require a permit (authorization) from the Corps; this letter can only be used if the proposed activity is not a regulated activity, regardless of where the activity may occur. A NPR letter cannot be used to indicate the presence or absence of wetlands and/or other aquatic resources, nor can it be used to determine their jurisdictional status.

NOTE 1: Pre-approved Delineations and/or JDs are NOT a pre-requisite for submitting a DA permit application. Requests for JDs and/or DCs that are not associated with a DA permit application (Standalone Delineation / JD requests) will be reviewed and processed as time allows and based on available resources.

NOTE 2: Although not a requirement, it is recommended that Standalone requests be prepared and submitted by an environmental consultant to expedite the review process.

Select the Appropriate Request:

\Box Pre-Construction Notification or Department of the Army permit application

 \square with Delineation only (no written concurrence of delineation)

 \Box with Delineation Concurrence¹

 \Box with Preliminary Jurisdictional Determination (PJD)³

 \Box with Approved Jurisdictional Determination (AJD)²

Standalone Delineation / Jurisdictional Determination

Standalone Delineation / Jurisdictional Determination requests will be reviewed and processed as time allows and based on available resources.

Delineation Concurrence¹

 \Box Preliminary Jurisdictional Determination (PJD)³

 \Box Approved Jurisdictional Determination (AJD)²

 \Box I request that the Corps delineate the wetlands and/or other aquatic resources that may be present on my property.

These requests have historically been conducted as a courtesy for private property owners for minor actions. Due to current workload and priorities, the Charleston District Regulatory Division will only provide this service on a limited basis for private individuals on small tracts of land (typically 1 acre or less).

 \Box with the attached Pre-Construction Notification or Department of the Army permit application

(This may delay processing times. The review of the permit application will not start until the delineation has been completed by the Corps.)

 \Box with a Delineation Only, an AJD or PJD

□ "No Permit Required" (NPR) Letter as I believe my proposed activity is not regulated⁴

 \Box Unclear and require additional information to inform my decision.

IV. LEGAL RIGHT OF ENTRY

By signing below, I am indicating that I have the authority, or am acting as the duly authorized agent of a person or entity with such authority, to and do hereby grant U.S. Army Corps of Engineers personnel right of entry to legally access the property(ies) subject to this request for the purposes of conducting on-site investigations (e.g., digging and refilling shallow holes) and issuing a jurisdictional determination. I acknowledge that my signature is an affirmation that I possess the requisite property rights to request a jurisdictional determination on the properties subject to this request.

PO Box 29682, Richmond, VA, 23242

Mailing Address

MarkDWilliams@luckcompanies.com

Email Address

*Signature:

174-00-00-006 Property Address / TMS #(s) (804) 476-6404 Daytime Phone Number Mark Williams - May 1, 2023 **Printed Name and Date**

*<u>Authorities</u>: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section
103, 33 USC 1413; Regulatory Program of the U.S. Army Cor under the regulatory authorities referenced above.
Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public, and may be made availa

and the public on the District's website and property location where federal jurisdiction is to be determined will be included in the approved jurisdictional determination (AJD), which will be made
available to the public

Disclosure: Submission of requested information is voluntary; however, if information is not provided, the request for an jurisdictional determination cannot be evaluated nor can a jurisdictional determination be issued.

JURISDICTIONAL DETERMINATION AND DELINEATION CHECKLIST:

This checklist is to assist prospective requesters in submitting complete and proper information. This is NOT a comprehensive list nor are all items mandatory for all projects. However, the list contains general information typically necessary for this office to confirm jurisdictional and/or wetland delineations as part of the permitting process. Required items are indicated by an asterisk (*). To reduce delays in verifying Jurisdictional Determinations and Delineations, it is recommended that the information provided is a complete and true representation of wetlands and other aquatic resources that may be present onsite. It is also recommended that submissions be prepared and submitted by an environmental consultant. Although this is not a requirement, it will significantly expedite the review process.

Following these standards will help to expedite our review. Flexibility of these standards may be determined by the Regulatory Division on a case-by-case basis only. Please note the Corps has the ability to reject delineation work that is incomplete or inaccurate.

■ *Completed Request For Corps Jurisdictional Determination (JD) / Delineation AND Legal Right of Entry

Site Information:

If "Location Maps: large-scale and small-scale maps, including streets, intersections, cities and an accurate depiction of the site boundary shown.

Note: Only contiguous/adjoining parcels can be submitted under one JD request. If there is an area not within the JD request that separates the areas of review (i.e., a road, utility line, etc.), a separate JD request should be submitted each area.

- **T** *Overlay of site boundary on aerial photo, USGS topographic map, soil survey, NWI Map, etc.
- *Site's coordinates should be based on a standard coordinate system, i.e., Geographic (at least to the nearest tenth of a second), State Plane or UTM. Indicate the coordinate system (and zone for UTM), units (English or metric) and the corresponding geodetic datum, either NAD27 or NAD83.
- **E** *Property lines with measurements illustrating all existing land features, including streams, ditches, trails, etc.
- Landscape photos of representative upland areas and aquatic resources, with the photo locations and directions of photos marked on a depiction.
- □ Current land use and plant communities located on and adjacent to the area under review (i.e., agricultural, industrial, residential, cropland, lawn, forested, etc.). If known, a brief history of the previous land use will be helpful.
- \Box Proposed & existing structures clearly defined as such.
- □ Dimensions of proposed structures such as a driveway, house, garage, and other structures which are proposed in wetlands.
- \square Sewage/septic system: location, dimensions and type.
- \Box Drainage ditches and/or berms: location and dimensions.
- "Wetland Determination Data Forms: Record wetland delineation information for both the upland and wetland side of various points along the boundary. Current version from appropriate Regional Supplement found at: https://www.sac.usace.army.mil/Missions/Regulatory.aspx

Elements for Depictions of All Sites:

- **The Block with project name, applicant, county, state, date.**
- *North arrow

Solid bold line depicting project area boundary with label. The project area boundary should be accurate and may be represented by survey, tax map, or GPS coordinates with coordinates provided. Please note that a survey is NOT required. Tax maps may only be used if the project area includes the entire parcel(s), Include the Tax Map Parcel Numbers, Property Identification Numbers, etc., the source of the map, and date of preparation (print date).

■ *Clearly marked boundaries of all wetlands and/or other aquatic resources and other pertinent features that are present (Wetlands, Tributaries, Lakes, Borrow Pits, Ponds, Rivers, Drainage Features, Ditches) and have been flagged in the field. Surveyed or GPS coordinates of the boundaries should be provided. (At a minimum, potentially non-jurisdictional linear features should be included on a supplement sketch/depiction.)

"Labels of wetlands and/or other aquatic resources. Refer to the below tables for the standardized labels that should be used for AJDs, PJDs and/or Delineation Concurrence.

■ *Size (acres) and length (linear feet) of each individual wetlands or aquatic resource included on the depiction.

■ *Wetland Determination Data Form point locations with labels. (At a minimum, this should be included on a supplement sketch/depiction.)

under the regulatory authorities referenced above.
Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public, and may be made availa

and the public on the District's website and on the Headquarters USACE website.
available to the public on the District's website and on the Headquarters USACE website.

Disclosure: Cubrission of requested information is voluntary; however, if information is not provided, the request for an jurisdictional determination cannot be evaluated nor can a jurisdictional
determination be issued.

^{*&}lt;u>Authorities</u>: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section
103, 33 USC 1413; Regulatory Program of the U.S. Army Cor

*Standardized Labels for Depictions of Wetlands and Aquatic Resources

Table 1: Labels for PJDs and Delineation Concurrence

"Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section
103, 33 USC 1413; Regulatory Program of the U.S. Army Corps

Disclosure: Submission of requested information is voluntary; however, if information is not provided, the request for an jurisdictional determination cannot be evaluated nor can a jurisdictional
determination be issued.

Appendix D

U.S. Army Corps of Engineers Global Positioning Systems (GPS) Datasheet Delineation of Wetlands and Non-Wetland Waters

USACE File Number **Date of Delineation** Date of Delineation

March 9-10, 2023

Name of Delineator Present

Myles McKnight, Brandon Smith, Tabitha Williams, HHNT

Make and Model of GPS Device Used (must be capable of sub-meter accuracy)

Juniper System Archer 2

Geographic Coordinate System Used

NAD 83, South Carolina

Name of Continually Operated Reference Station Used for Post-processing

p779

Date Post-processing Performed

March 13, 2023

Percent Dilution of Position (PDOP) (6 or less is required)

1.45

Name and Coordinates of Known Property Corner and/or Monument

GPS Reading of Known Property Corner and/or Monument

Frequency of Waypoints Taken During Survey

1 every second to 100 readings, then averaged.

Note: GPS data must be provided, if requested. If GPS data and/or GPS delineation is determined unacceptable, a survey sealed by a surveyor licensed in South Carolina will be required.

APPENDICES

- Appendix A: Figures
- Appendix B: Wetland Data Forms
- Appendix C: Upland Data Forms
- Appendix D: Non-Wetland Waters Data Forms
- Appendix E: Site Photographs
- Appendix F: Precipitation and Drought Data

APPENDIX A FIGURES

- 1. Location Map
- 2. USGS Topographic Map
- 3. Soils Map
- 4. NWI Map
- 5. FEMA Map
- 6. Delineation Map
- 7. Photo Location Map

Figure 5 - FEMA Map

DISCLAIMER:

This drawing and the information contained herein is for general presentation purposes only and is a compilation of shapefile(s) provided by various source(s).
The source and accuracy of the file(s) has not been verified by HHNT and therefore
the drawing is not intended for use as a engineering draw

Project Area (\sim 331.01 Acres) FEMA Flood Zone A 777

Luck Companies Saluda Quarry Saluda County, SC

APPENDIX B WETLAND DATA FORMS

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: MC11 Wet

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: TA3 Wet

Soil very dry and rocky, difficult to obtain past 14 inches.

APPENDIX C UPLAND DATA FORMS

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: MC11 Up

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: TA3 Up

APPENDIX D NON-WETLAND WATERS DATA FORMS

SFA

NC DWQ Stream Identification Form Version 4.11

SFC

NC DWQ Stream Identification Form Version 4.11

SF_D

NC DWQ Stream Identification Form Version 4.11

SMA

NC DWQ Stream Identification Form Version 4.11

SMB

NC DWQ Stream Identification Form Version 4.11

SMC

NC DWQ Stream Identification Form Version 4.11

SMCI

NC DWQ Stream Identification Form Version 4.11

SM_D

NC DWQ Stream Identification Form Version 4.11

STA

NC DWQ Stream Identification Form Version 4.11

APPENDIX E SITE PHOTOGRAPHS

PHOTO 1: Typical Project Upland - Forested

PHOTO 2: Non-Wetland Water SMC (Perennial)

Project No.: 4780-021

Date: March 2023

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PHOTO 3: Non-Wetland Water SMCI (Intermittent)

PHOTO 4: Wetland MA

Project No.: 4780-021

Date: March 2023

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PHOTO 5: Non-Wetland Water SMD (Intermittent)

PHOTO 6: Wetland MB

Project No.: 4780-021

Date: March 2023

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PHOTO 7: Wetland MB

PHOTO 8: Project Boundary

Project No.: 4780-021

Date: March 2023

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PHOTO 9: Typical Project Upland - Rock Outcrops

PHOTO 10: Non-Wetland Water STA (Perennial)

Project No.: 4780-021

Date: March 2023

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PHOTO 11: Non-Wetland Water STA (Perennial)

PHOTO 12: Typical Project Upland - Hardwoods and Planted Pines

Project No.: 4780-021

Date: March 2023

Site Photographs Luck Companies Saluda Quarry Saluda County, SC

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PHOTO 13: Typical Project Upland - Planted Pines

PHOTO 14: Typical Project Upland - Forested

Project No.: 4780-021

Date: March 2023

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PHOTO 15: Typical Project Upland - Planted Pines

PHOTO 16: Non-Wetland Water SFA (Intermittent)

Project No.: 4780-021

Date: March 2023

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PHOTO 17: Non-Wetland Water SFA (Intermittent)

PHOTO 18: Non-Wetland Water SFC (Intermittent)

Project No.: 4780-021

Date: March 2023

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PHOTO 19: Typical Project Upland - Rock Outcrops

PHOTO 20: Non-Wetland Water SFD (Intermittent)

Project No.: 4780-021

Date: March 2023

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PHOTO 21: Non-Wetland Water SFD (Intermittent)

PHOTO 22: Typical Project Upland - Forested

Project No.: 4780-021

Date: March 2023

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PHOTO 23: Non-Wetland Water SFD (Intermittent)

PHOTO 24: Non-Wetland Water STA (Perennial)

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PHOTO 25: Typical Project Upland – Flat Rock Branch Floodplain

PHOTO 26: Wetland FA

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Date: March 2023

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PHOTO 27: Culvert Associated With Non-Wetland Water STA (Perennial) Road Crossing

PHOTO 28: Road Crossing Associated With Non-Wetland Water STA (Perennial)

Project No.: 4780-021

Date: March 2023

Site Photographs Luck Companies Saluda Quarry Saluda County, SC

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PHOTO 29: Typical Project Upland – Forested

PHOTO 30: Site Entrance Road

Project No.: 4780-021

Date: March 2023

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PHOTO 31: Typical Project Upland – Planted Pines

PHOTO 32: Typical Project Upland – Rock Outcrops

Project No.: 4780-021

Date: March 2023

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PHOTO 33: Typical Project Upland – Rock Outcrops

PHOTO 34: Typical Project Upland – Rock Outcrops

Project No.: 4780-021

Date: March 2023

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PHOTO 35: Typical Project Upland – Planted Pines

PHOTO 36: Typical Project Upland – Rock Outcrops

Project No.: 4780-021

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PHOTO 37: Typical Project Upland - Forested

PHOTO 38: Typical Project Upland – Planted Pines

Project No.: 4780-021

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PHOTO 39: Typical Project Upland – Planted Pines

PHOTO 40: Typical Project Upland - Forested

Project No.: 4780-021

Date: March 2023

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PHOTO 41: Typical Project Upland – Rock Outcrops

PHOTO 42: Typical Project Upland – Forested

Project No.: 4780-021

Date: March 2023

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PHOTO 43: Typical Project Upland – Planted Pines

PHOTO 44: Typical Project Upland – Planted Pines

Project No.: 4780-021

Date: March 2023

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PHOTO 45: Typical Project Upland – Planted Pines

PHOTO 46: Typical Project Upland – Rock Outcrops

Project No.: 4780-021

Date: March 2023

Site Photographs Luck Companies Saluda Quarry Saluda County, SC

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APPENDIX F PRECIPITATION AND DROUGHT DATA

Written by Jason Deters U.S. Army Corps of Engineers

GILBERT 0.0 NE 33.9244, -81.3931 533.136 8.528 GILBERT 1.2 SSW | 33.9071, -81.4009 | 485.892 | 7.929 GILBERT 1.0 SE 33.915, -81.3813 493.11 9.097 SALUDA 33.9919, -81.7714 479.987 14.762

Written by Jason Deters U.S. Army Corps of Engineers

RIDGE SPRING 0.4 SSW 33.84, -81.6663 632.874 8.403 GILBERT 0.0 NE 33.9244, -81.3931 533.136 8.528 GILBERT 1.2 SSW 33.9071, -81.4009 485.892 7.929 GILBERT 1.0 SE 33.915, -81.3813 493.11 9.097 SALUDA 33.9919, -81.7714 479.987 14.762
U.S. Drought Monitor **South Carolina**

March 14, 2023

(Released Thursday, Mar. 16, 2023)

Valid 8 a.m. EDT

Drought Conditions (Percent Area)

Intensity:

None D0 Abnormally Dry

D3 Extreme Drought

D1 Moderate Drought

D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. For more information on the Drought Monitor, go to https://droughtmonitor.unl.edu/About.aspx

Author:

Brad Rippey

U.S. Department of Agriculture

droughtmonitor.unl.edu

APPENDIX B Kennedy Consulting Services - Luck Saluda Mine Maps

N/F
BODIE WILLIAM C
TMS 174-00-00-007

BUFFER AREA 46.9 ACRES FUTURE IMPACT AREA 0.0 ACRES

TOTAL PERMIT AREA 331.0 ACRES

1. MINE PERMIT BOUNDARY IS BASED ON SURVEY BY WELLSTON AND ASSOCIATES LAND SURVEYORS, LLC. THE MINE PERMIT AREA IS PART OF AN OVERALL TRACT (TMS# 174-00-00-006). THE MINE PERMIT AREA IS EXPECTED TO BE SUBDIVIDED.

2. TOPOGRAPHIC CONTOURS WERE SURVEYED BY WELLSTON AND ASSOCIATES, LLC.

3. AQUATIC RESOURCES SHOWN ARE FROM HHNT'S DELINEATION IN PREPARATION FOR DELINEATION CONCURRENCE REQUEST
TO THE US ARMY CORPS OF ENGINEERS. EROSION AND AND EROSION SEDIMENT CONTROL PLAN.

4. STORMWATER SEDIMENT BASINS AND STORMWATER DIVERSIONS ARE AS PROVIDED BY HHNT IN CONJUNCTION WITH THE

5. SURROUNDING PARCEL DATA ARE FROM SALUDA COUNTY'S GEOGRAPHIC INFORMATION SYSTEM (GIS) DEPARTMENTS.

NOTES:

6. MINE DESIGN PROVIDED BY LUCK STONE CORPORATION.

N/F
BARR-CAR TIMBERLANDS, LLC
TMS 173-00-00-035

N/F
IMPERIAL WOODLANDS, LLC
TMS 173-00-00-006

PIT-PHASE \setminus (47.7 ACRES)

PIT-PHASE

 (58.0 ACRES)

PRIOR TO IMPACTING STREAM AND STREAM BUFFER WB-5, IMPACTS TO STREAM WILL BE PERMITTED BY CORPS AND LOSS TO WOTUS MITIGATED

PLANT POND

 (43.3 ACRES) $\beta \in \mathbb{R}$, we see that \mathbb{R}

OFFICE

 N/F BARR-CAR TIMBERLANDS
TMS 174-00-00-008

APPENDIX C Geophysical Methods and Results

GEOPHYSICAL INVESTIGATION Confidential Site #1

Saluda, South Carolina

Prepared for: Bunnell Lammons Engineering 6004 Ponders Court Greenville, South Carolina 29615

August 28, 2023

Prepared by:

THG Geophysics, Ltd. 4280 Old William Penn Highway Murrysville, Pennsylvania 15668 724-325-3996 www.thggeophysics.com THG Project No. 1384-11325rev

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- Survey Layout

VLF Profiles 1 through 8

Electrical Imaging Data Profiles 1 through 6

3D Interpolation Apparent Resistivity Depth Slice 5.

DIGITAL APPENDICES

D1. Saluda_3D_El.gif

1.0 INTRODUCTION

1.1 BACKGROUND

Bunnell Lammons Engineering, Inc. (BLE) contracted with THG Geophysics, Ltd. (THG) to investigate the subsurface of the Confidential Site #1 project (Project) located in Saluda, South Carolina (Figure 1). Due to site access restrictions preventing full workdays, the survey was completed over three (3) mobilizations on April 3-7, April 17-21, and May 11-14, 2023. The objective of the survey was to image bedrock fractures within an approximately 96-acre area of interest. The survey area consisted of densely vegetated abandoned agricultural lands and tree farm property.

1.2 WORK SCOPE

The primary work scope consisted of acquiring eight (8) very low frequency (VLF) survey profiles, totaling approximately 20,000 linear feet, in a regular grid over the project site. To further characterize fractures identified in VLF data, six (6) 2-D electrical resistivity imaging (EI) profiles, totaling approximately 9,000 linear feet, were collected over the site (Figure 2).

2.0 GEOPHYSICAL METHODS

2.1 VERY LOW FREQUENCY SURVEY

A VLF bedrock fracture survey was conducted using an ABEM WADI meter to collect eight (8) profiles (Figure 2). The VLF method can be used to find steeply dipping structures that differ from their surroundings with regard to electrical resistance. VLF transmitters, the strongest located in Cutler, Maine, send out low frequency military radio signals (15-30 kHz). When the field emitted by one of the transmitters strikes an anomaly, secondary currents are created that can be read and recorded by the WADI VLF meter.

Cables, metal pipes, and grounded metal fences can also cause very strong anomalies because they are grounded, which permits a large ground-return current loop to form, showing a similar signature to that of fractured bedrock (ABEM Geophysics, 1989).

When a field emitted by a transmitter strikes a body having low electrical resistance, secondary circuits are created in the body. Fraser filtering, a numeric algorithm is performed on the real part of the VLF data to enhance the anomaly. Fraser filtering is based upon the work of Karous and Hjelt (1983):

$$
F_o
$$
= - 0.102 H_{-3} + 0.059 H_{-2} - 0.561 H_{-1} + H_0 + 0.561 H_1 - 0.059 H_2 + 0.102 H_3

Where; F_0 is the filtered result and H_{-3} to H_3 are the original VLF data.

Approximately 20,000 linear feet of VLF data were collected in eight (8) profile lines; VLF Lines 1 through 4 are oriented west to east and VLF lines 5 through 8 are oriented south to north (Figure 2). The composite VLF profiles are generated through the Fraser-filtering algorithm and is an estimate of the presence and dip of fractures, where the portion of the image in red (or darker colors) is considered to be the profile of a fracture (however overhead power lines, underground utilities and fences can create noise within this image). These profiles are projected to image to a depth of 300 feet below grade (Figure 3).

2.2 ELECTRICAL IMAGING SURVEY

2.2.1 Introduction

Electrical resistance is based upon Ohm's Law:

$$
R = \frac{V}{I} \quad [ohms]
$$

Where, resistance, **R**, is equal to the ratio of potential, **V** (volts) to current flow, **I** (amperes).

Resistivity is the measure of the resistance along a linear distance of a material with a known cross-sectional area. Consequently, resistivity is measured in Ohm-meters. This report presents the geophysical results as geo-electrical profiles of modeled resistance plotted as 2 dimensional profiles of distance and depth, in units of feet.

Electrical currents propagate as a function of three material properties (1) ohmic conductivity, (2) electrolytic conductivity, and (3) dielectric conductivity. Ohmic conductivity is a property exhibited by metals. Electrolytic conductivity is a function of the concentration of total dissolved solids and chlorides in the groundwater that exists in the pore spaces of a material. Dielectric conductivity is a function of the permittivity of the matrix of the material. Therefore, the matrix of most soil and bedrock is highly resistive. Of these three properties, electrolytic conductivity is the dominant material characteristic that influences the apparent resistivity values collected by this method. In general, resistivity values decrease in water-bearing rocks and soil with increasing:

- a. Fractional volume of the rock occupied by groundwater;
- b. Total dissolved solid and chloride content of the groundwater;
- c. Permeability of the pore spaces; and,
- d. Temperature.

Materials with minimal primary pore space (i.e., limestone, dolomite) or those which lack groundwater in the pore spaces will exhibit high resistivity values (Mooney, 1980). Highly porous, moist, or saturated soil will exhibit very low resistivity values.

In homogeneous ground, the apparent resistivity is the true ground resistivity; however, in heterogeneous ground, the apparent resistivity represents a weighted average of all formations through which the current passes. Many electrode placements (arrays) have been proposed (for examples see Reynolds, 1997); however, the Schlumberger array has proven to be an effective configuration for imaging bedrock. The following Schlumberger array was used in the collection of data:

$$
R_i = \frac{\pi a^2}{b} \int I \frac{b^2}{4a^2} J R; \, a = 5b
$$

Where, R_i , resistivity, is related to the number of poles, n, the separation distance between the current source and current sink **, and the pole spacing,** $**a**$ **.**

2.2.2 Methods

The resistivity survey was performed using the ARES II multi-electrode cable system (GF Instruments, s.r.o., Brno, Czech Republic). The survey was conducted using stainless steel electrodes and passive multi-electrode cables with switch boxes. EI profiles were collected with a 3-meter step-out Schlumberger array. All lines were designed to image approximately 300 feet below grade (Figure 5). The locations of all data were recorded in the field using a Trimble Geo-7XH global positioning system (GPS). Elevation data for further processing was obtained from client-provided GIS data.

2.2.3 Processing

A forward modeling subroutine was used to calculate the apparent resistivity values using the EarthImager2D program (AGI, 2002). This program is based on the smoothness-constrained least-squares method (deGroot-Hedlin and Constable, 1990; Loke and Barker, 1996). The smoothness-constrained least-squares method is based upon the following equation:

$$
J^T g = (J^T J + \mu F) d
$$

Where, **F** is a function of the horizontal and vertical flatness filter, **J** is the matrix of partial derivatives, μ is the damping factor, **d** is the model perturbation vector, and **g** is the discrepancy vector.

The EarthImager2D program divides the subsurface 2-D space into a number of rectangular blocks. Resistivities of each block are then calculated to produce an apparent resistivity pseudo section. The pseudo section is compared to the actual measurements for consistency. A measure of the difference is given by the root-mean-squared (rms) error.

The results of the 2-D EI profiles were modeled in 3-D space with the Voxler 4 program. A volume of apparent resistivity data was generated through 3-D interpolation. Elevation depth slices of apparent resistivity were extracted at 10-ft intervals across elevations common to all profiles from 250-430 ft amsl (Figure 5, Digital Appendix D1).

2.3 QUALITY ASSURANCE AND QUALITY CONTROL

The interpretation of geophysically-generated data is not an exact science since the responses to induced disturbance is affected by many phenomena including buried metals, operator error, precipitation, and net changes in ground saturation conditions. Some sources of spurious data can be overcome through a QA/QC program and use of multiple geophysical methods. The quality control program employed with this study included frequent checks of the equipment and resurveys of lines and locations. The QA/QC program indicates that all geophysical equipment functioned as designed during the survey program.

3.0 GEOLOGY

The area of focus for this survey lies within the Late Paleozoic-aged Clouds Creek pluton. The Clouds Creek is a composite body consisting of biotite and cordierite-biotite monzogranite and granodiorite (Speer, 1981). This elongate pluton has considerable variation in texture and color, but it is distinctly porphyritic throughout its western half and its northern end. Phenocrysts in the porphyritic granite are generally very distinctive, being round to oval crystals of potassium feldspar as much as 2 inches in diameter (Overstreet, 1965).

4.0 GEOPHYSICAL INTERPRETATION

4.1 INTRODUCTION

Mapping subsurface fractures with the VLF method requires the collection of many individual measurements along each profile. This is due to the final Fraser-filtered output, where each data point is dependent on the six adjacent measurements. Additionally, each individual profile must completely cover an anomaly (i.e. fracture), and ideally should cover multiple anomalies across each profile. This is necessary to develop a model of local fractures through characterization of similar anomalies on adjacent, parallel profiles. Eight (8) VLF profiles were collected at the site in an orthogonal orientation (south-north and west-east) (Figures 2-3). In order to adequately survey the entire approximately 96-acre site, parallel VLF profiles were spaced approximately 500 feet apart. The VLF profiles imaged to a depth of 300 feet below grade; however, this does not take topography into account.

VLF profiles 1-4 were collected in an approximately west to east orientation and profiles 5-8 were acquired in an approximately south to north orientation (Figure 2). All profiles were collected using a 32-foot (10 meter) station separation.

In addition to fractures, anomalies can be generated by cultural sources. For example, power lines, subsurface utilities and metal fencing can also cause very strong anomalies. No utilities, fences or overhead power lines are identified at the site. One approximately 200-foot section of VLF data in profile 6 was corrupted during acquisition and therefore omitted from the report (Figure 3). Overall, VLF data quality is very good.

To further characterize fractures identified from VLF data, six (6) electrical imaging profiles were collected across the site. Profiles were positioned and oriented to image strong VLF fractures. Each profile was collected using a 9.8 feet (3 meters) electrode spacing in various cable configurations (Figure 4). The resulting 2-D profiles imaged to depths of approximately 300 feet below grade.

Generally, individual geologic units have a common apparent resistivity value. Low apparent resistivity values are typically associated with soils, saturated materials, and highly weathered bedrock; whereas, high apparent resistivity values are associated with rock (also increasing with rock competence). Clay materials can exhibit a range of apparent resistivity from 1-20 Ohm-m, sand can exhibit a range from 20-200 Ohm-m, and metamorphic units can exhibit a range from 10-5,000 Ohm-m. (Palacky, 1987).

Consequently, very high apparent resistivity measurements can indicate very hard, nonpermeable rock or air–filled voids. Very low apparent resistivity measurements can indicate soil or saturated voids. In cases of severe weathering, rock can become fractured and highly porous. As sediment and water migrate into fractures and pore spaces, these lithologies can display very low apparent resistivity values.

4.2 DISCUSSION

Numerous fractures are interpreted within the site footprint (Figure 2). The VLF and EI data indicate that the site is characterized by generally orthogonally oriented southwest to northeast and southeast to northwest fractures.

Locally, graben fracture systems were located along VLF profiles 2, 3 and 7 (Figure 3). These features are generally favorable for groundwater production. Fractures identified in EI profiles correlate well with the locations of interpreted fracture grabens in VLF profiles 2 and 7 (Figures 2-4). No EI data was collected in the vicinity of the fracture graben interpreted in VLF profile 3. A very strong VLF anomaly is identified in VLF profile 6 at approximately 1,100 feet along the profile and correlates well with the location of a fracture identified in EI profile 5 (Figures 3-4).

Fractures are positioned on the map based on where they would theoretically intercept the ground surface. In some cases, interpreted VLF and EI fractures align and interpreted fracture orientations extend across the entire site (Figure 2).

Apparent resistivity values at the project site range from approximately 50 to 82,000 Ohm-m; consistent with the geology of the site. EI profiles are positioned to image deeper portions of strong VLF anomalies, consistent with depths likely reached during geotechnical drilling. Several fractures are identified in the EI data including one interpreted graben fracture system in EI profile 1 (Figure 4).

5.0 CONCLUSION

Two geophysical (VLF and EI) methods were used to identify subsurface fractures at the Confidential Site #1 project located in Saluda, South Carolina. The interpreted fractures at the site generally trend southeast to northwest and southwest to northeast (Figure 2). Fracture dips were interpreted in both directions perpendicular, respectively, to the trend of a fracture.

Geophysical investigations are a non-invasive method of interpreting physical properties of the shallow earth using electrical, electromagnetic, or mechanical energy. This document contains geophysical interpretations of responses to induced or real-world phenomena. As such, the measured phenomenon may be impacted by variables not readily identified in the field that can result in a false-positive and/or false-negative interpretation. THG makes no representations or warranties as to the accuracy of the interpretations.

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4003048 ft 304 8005095 ft 457 2009144 ft 609.6012152 ft

 $1 in = 500$ ft

Notes Geophysical survey was conducted April 17-21 and May 11-14, 2023.
using a GF Instruments ARES II electrical resistivity meter with stainless
steel electrodes in a 3-meter Schlumberger array. Horizontal Scale: 1 in = 100 ft
Vertical Scale: 1 in = 100 ft
No vertical exaggeration

Locations and depths are approximate

ELEVATION:

 \mathcal{N}

True North
Approximate

430 ft amsl

ELEVATION:

350 ft amsl

Apparent Resistivity (Ohm-m) 9,000 8,400 Competent
Bedrock 7,800 7,200 6,600 6,000 5,400 4,800 Weathered Bedrock/Overbuden 4,200 3,600 3,000 2,400 1,800 $1,200$ 600 J o

Notes

Geophysical surveys conducted April 3-7, 2023.
using ABEM Wadi Very Low Frequency meter and
April 17-21 & May 11-14, 2023, using GF Instruments
ARES II electrical resistivity meter.

Real-time positioning of data using fully integrated Trimble
Geo-7X global positioning system set to NAD 1983
US State Plane (South Carolina) coordinate system
in US Survey feet.

El data modeled in Voxler 4 and interpolated in 3-D.
Plan view depth slices for elevations common across all El profiles were extracted at 10-foot intervals. A full
illustration of all depth slices from 250-430 ft amsl is included digitally as Saluda_3D_El.gif.

Locations are approximate.

ELEVATION:

250 ft amsl

Sources

Aerial LuckSaludaCO_Ortho_20230310

Topography
USGS_1M_17_x44y376_SC_SavannahPeeDee_2019_B19
Contour interval = 10 ft

Basemaps Confidential #1 (Saluda) GIS Files

APPENDIX D Well Permit and Well Records

Monitoring Well Approval

Approval is hereby granted to: Luck Stone Corporation Attention: Bruce Smith, T.J. Daniel

Facility: **Luck Stone Corporation** – Saluda Quarry

Mine Operating Permit No. Pending Saluda County

This approval is for the installation of a monitoring well, identified and located as specified and in accordance with the construction plans and specifications described in the monitoring well application (enclosed). This well is to be used for water level monitoring prior to a quarry construction and operation.

Conditions:

1. The well shall be drilled, constructed, and abandoned by a South Carolina certified well driller per R.61-71.D.1.

2. The well shall be properly developed per R.61-71.H.2.d. A Water Well Record Form (DHEC 1903) and drillers/geologists logs shall be completed and submitted within 30 days after well completion or abandonment unless another schedule has been approved by DHEC. The form should contain the "as-built" construction details and all other information required by R.61-71.H.1.f.

3. All analytical data and water levels obtained from the monitoring well shall be submitted to the author of the approval within 30 days of receipt of laboratory results unless another schedule has been approved by DHEC as required by R.61-71.H.1.d.

4. The monitoring well shall be labeled, as required by R.61-71.H.2.c.

This approval is pursuant to the provisions of Section 44-55-40 of the 1976 South Carolina Code of Laws and R.61-71 of the South Carolina Well Standards and Regulations, effective May 27, 2016.

Date of Issuance: June 16, 2023

Sarah Harris

Sarah Harris, Geologist / Hydrologist Mining and Reclamation Section Division of Mining and Solid Waste Management Bureau of Land & Waste Management

June 13, 2023

Columbia, SC 29201 2600 Bull Street South Carolina Department of Health and Environmental Control

Dear Mr. Eddy:

On behalf of Luck Companies, Bunnell-Lammons Engineering, Inc. is pleased to submit this DHEC 3736 Monitoring Well Application (**Appendix A**) to the South Carolina Department of Health and Environmental Control (DHEC) in association to the installation of six (6) observation monitoring wells for the purpose of aquifer testing and subsequent groundwater modeling at the proposed Luck Companies Saluda Quarry (**Figures 1** and **2**).

The anticipated depth of each proposed observation well is not anticipated to exceed approximately 400 feet below ground surface. The actual depth of the proposed observation wells will vary based on site specific conditions such as depth to groundwater and presence of water bearing fractures. Please see the attached **Figure 3** for a typical observation well schematic. In general, each well will be constructed of 6-inch diameter Schedule 40 PVC from ground surface to the top of bedrock at which point the well will be completed "openhole" until boring termination. The wells will be secured with a locked stick-up well cover.

We ask that DHEC please provide review and response of this application to BLE and Luck Companies prior to the tentative drilling start date of June 19, 2023. If you have any questions, please contact us at (864) 288- 1265.

Sincerely,

BUNNELL LAMMONS ENGINEERING INC. PEF002542 Exp. 06/30/2024

T.J. Daniel, P.G. David Loftis, P.E. Project Geologist Senior Engineer

cc: Bruce Smith – Luck Companies Clint Courson, CHMM – HHNT Tyler Moody, P.E. – BLE

Registered, South Carolina #2385 Registered, South Carolina #27867

Attachments: Figures

Appendix A: DHEC 3637 Monitoring Well Application 6004 Ponders Court, Greenville, SC 29615 (864.288.1265 (864.288.4430) info@blecorp.com

BLECORP.COM

FIGURES

APPENDIX A DHEC 3736 Monitoring Well Application

DHEC 1903 (08/2017) COPY 1 MAIL TO SCDHEC, COPY 2 TO WELL OWNER, COPY 3 TO WELL DRILLER

APPENDIX E Pump Test Charts

APPENDIX F Groundwater Modeling Results

Observed and Simulated Drawdown in Pumping Well D-1

Observed and Simulated Drawdown in Observation Well O-1

Observed and Simulated Drawdown in Observation Well O-2

Observed and Simulated Drawdown in Observation Well O-3

Observed and Simulated Drawdown in Observation Well O-4

Observed and Simulated Drawdown in Observation Well O-5

Dewatering Rate in Dry Model (D1) and Pond 4 Infiltration Model (P4); and Drawdown over Time in Phase 1 Pit and Phase 2 Pit

Saluda Models D1 and P4: Dewatering Rate

Dewatering Rate in Dry Model (D1) and Pond 4 Infiltration Model (P4); Pond 4 Infiltration Rate; and Drawdown over Time in Phase 1 Pit and Phase 2 Pit

Drawdown over Time in Phase 1 Pit, Phase 2 Pit, and Observation Wells; Dry Model (D1) (no re-infiltration of discharge water) and Pond 4 Infiltration Model (P4)

