

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Michele Lujan Grisham**  
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Cabinet Secretary Designate

**Ben Shelton**  
Acting Deputy Secretary

**Albert C.S. Chang, Director**  
Mining and Minerals Division



*Electronic Submittal*

September 5, 2024

Kevin L. Raabe, Operations Manager, RSO  
Rio Grande Resources Corporation (RGR)  
P.O. Box 1150  
Grants, NM 87020

RE: Comments on *Discharge Pipeline Abandonment Work Plan*, dated April 19, 2024, Mt. Taylor Mine, Permit No. CI002RE, Cibola Co. NM.

Dear Mr. Raabe,

The New Mexico Mining and Minerals Division (MMD) has received the *Discharge Pipeline Abandonment Work Plan* (Workplan), dated April 19, 2024 for the Mt. Taylor Mine, Permit No. CI002RE located in Cibola County, NM. This Workplan was submitted by Engineering Analytics, Inc. (EA) on behalf of RGR.

MMD has the following comments regarding the Workplan. Please respond to these comments.:

1. 1.0 Introduction: The second paragraph mentions that the water was treated before discharge. It is MMD's understanding that the water was not treated because it met the current standards at the time. How does the Mine Water Treatment Unit differ from the Ion Exchange Plant that was not utilized.
2. 3.1 Existing Mine Compliance Documents: What is the timeline for soil clean-up of the two above-background areas within the ROW and the one that is just beyond the pipe outfall?
3. 5.2.3 Arroyo Crossings: Could you provide a more detailed description of what the arroyo crossings look like or provide photos. It is unclear to MMD why these will not be removed or altered during this project.
4. 8.1 Soil Cleanup: All soil cleanup activities shall follow the *March 2016 Joint Guidance for the Cleanup and Reclamation of Existing Uranium Mining Operations in New Mexico* Guidance.
5. 8.1.3 Site Restoration: Generally speaking MMD would prefer that RGR minimize disturbance related to reclamation. Many of the areas where the pipeline will be removed will only require a light grading or raking to bring back to the natural grade of the land.

The native soils in the area carry a substantial seed bank that will aid the revegetation process.

6. Appendix A Revegetation Plan, Table C.5.1 Seed Mix: The Section 11 Other category contains some species that are not native to New Mexico. Only native seeds to the southwest are approved for reclamation projects in New Mexico. Please provide the selected seed mix for approval prior to seeding.
7. Where is the concrete wash pad located exactly? Adjacent to the production shaft? How will water be contained in the concrete wash pad to later be transported to Pond 3 for evaporation? The workplan does not make clear if there is any sort of temporary liner and/or water collection system.
8. Provide a schedule of operations for the pipeline removal work.

If you have any questions or concerns, please feel free to reach out to Clint Chisler at [clinton.chisler@emnr.d.nm.gov](mailto:clinton.chisler@emnr.d.nm.gov) or (505) 467-9589.

Sincerely,



Clint Chisler  
Permit Lead  
Mining Act Reclamation Program

CC: Melissa Meyer, EA Project Environmental Engineer  
Anita Wilcox, Department Specialist III, RGR  
Corey Dimond, NM Environment Dept.