

September 19, 2024

Project No. 111360

Mr. Clint Chisler
Permit Lead
NM ENMRD Mining and Mineral Division
Mining Act Reclamation Program
Uranium Reclamation Coordinator
New Mexico Energy Minerals and Natural Resources Department
1220 S. St. Francis Dr.
Sante Fe, NM 87505

RE: Response to Mining and Minerals Division September 5, 2024, Comments on Engineering Analytics' August 19, 2024, Mine Discharge Pipeline Abandonment Work Plan
Mt. Taylor Mine, Permit No. CI002RE

Dear Mr. Chisler,

This letter contains responses to comments from the September 5, 2024, Mine Discharge Pipeline Abandonment Work Plan Comment Letter from Mining and Minerals Division (MMD) of the New Mexico Energy Minerals and Natural Resources Department. Engineering Analytics, Inc. (EA), on behalf of Rio Grande Resources, has provided the following additional clarifying information.

MMD Comment 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.

Response: The Mine Water Treatment Unit used a flocculant to remove total suspended solids and a barium treatment for radium removal. The Ion Exchange Plant was constructed as a backup if needed for treatment as production ramped up, but it was never utilized since the mine discharge water met discharge limits.

MMD Comment 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?

Response: Impacted soil areas in the ROW will be addressed following the removal of the pipeline. Soil beyond the pipeline outfall will be evaluated as part of other reclamation activities and is not included in the scope of the discharge pipe abandonment.

MMD Comment 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.

Response: Photographs 1 and 2 are included to provide an example of arroyo crossings. As indicated in the photographs the discharge pipeline crosses a few arroyos on an elevated earth berm with CMPs to convey storm water. The pipeline will be removed from the top of the berm, but the berm, CMP and concrete wingwalls will remain in place. d.



Photograph 1 – Concrete Wing Walls for an Arroyo Crossing



Photograph 2 -CMP Arroyo Crossing Under the Discharge Pipelin

MMD Comment 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*.

Response: RGR will follow the March 2016 Joint Guidance for the Cleanup and Reclamation of Existing Uranium Mining Operations in New Mexico Guidance.

MMD Comment 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.

Response: RGR agrees and will minimize disturbance to only those areas needed.

MMD Comment 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.

Response: RGR proposes the Appendix A Revegetation Plan, Table C.5.1 Seed Mix minus Section 11.

1. Cool Season Grass-Western wheatgrass (*Agropyron smithii*) Rate: 6 PLS/ft²
2. Forb-Winterfat (*Ceratoides /anata*) Rate: 2 PLS/ft²
3. Warm Season Grass-Blue grama, Galleta, Spike Muhly (*Boute/oua gracilis*) Rate: 6.0-6.5 PLS/ft²
4. Warm Season Grass-Vine Mesquite Rate: 2 PLS/ft²
5. Warm Season Grass-Alkali Sacaton (*Sporobolus airoides*) Rate: 3 PLS/ft²
6. Forb-Rabbitbrush, 2 PLS/ft²
7. Forb-Fourwing saltbush (*Atriplex canescens*) Rate: 2 PLS/ft²
8. Forb-(Globemallow) (*Sphaeralcea fend/en*) Rate: 2 PLS/ft²
9. Forb-(Narrowleaf Penstemon) (*Penstemon angustifo/ia*) Rate: 2 PLS/ft²
10. Cool Season Grass-Bottlebrush Squirreltail Rate: 2 PLS/ft²

Comment 70: 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.

Response: The wash pad is located adjacent to the production shaft and is a concrete basin. The water will be contained in the basin and will be transported by a water truck to Pond 3.

MMD Comment 8: Provide a schedule of operations for the pipeline removal work.

Response: The estimated schedule is below.

- Anticipated start date: October 2024
- Cutting of pipe and removal to Mine Site: October to December 2024
- Removal of concrete supports and thrust blocks – December to January 2024
- Pipe cleaning and removal to offsite recycling facility – November to February 2024
- Soil clean-up of the above-background areas within the pipeline ROW – April to May 2025
- Regrading and reseeding – May to June 2025

Respectfully Submitted,

Engineering Analytics, Inc.



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Project Manager for Mt Taylor Mine

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