

Closure Activity Update: February 2020

RGR continued its planning phase of the closure activities. By the end of January, a draft work schedule was completed. Revisions to the schedule are ongoing as planning focuses change. Work priorities have been organized, but numerous tasks still remain to be fully defined. Updating the closure plan to reflect current site conditions is in progress. A vendor was contacted regarding its capabilities to close the shafts.

Conceptual planning for the disposal cell expansion continued. The current plan envisions delineating a maximum anticipated footprint and a phased approach to filling. Anticipated volumes of material to be remediated were being checked to support the choice of the anticipated footprint size.

Planning work continued for the post-closure ground water monitoring of the deep aquifers. Monitoring of these deep aquifers is expected to be difficult because of the great depth and hot water conditions. Wells were opened and plans were formulated to retrieve samples. Vendors were contacted about pump systems and pumping.

Activities

- 1) MWTU Pond No. 2
 - Pond 2 is ready to be filled with clean water
 - Sampled wells 6 and 8 for water quality to support filling
 - Filling is necessary in order to conduct a leak detection survey of the primary liner
 - Work continued on setting up the sump pump system, which included completing the fabrication of pump control stands and forming the foundations
- 2) MWTU Ponds 1, 4, 5, 6, 7, and 8
 - The final status surveys (FSS) are scheduled to be performed once drier and warmer weather arrives. Plans were made to begin these surveys by the end of the month, but soil moisture remained too high.
- 3) Ore Pile Removal
 - Removal and transportation of the ore pile material continued. An average of 4 trucks per day operated 5 days per week. Reduced transport capacity was due to weather and truck mechanical downtime
 - The ore pile was pushed into a more consolidated pile
- 4) Disposal Cell Liner and Waste Rock Pile (WRP)
 - RGR completed a conceptual plan for the expansion of the disposal cell to accommodate material expected to be generated during closure activities
 - Planning continued for constructing the disposal cell cover
- 5) WP5 Well, North Force Main and South Force Main
 - The WP5 well is being pumped on a fully continuous cycle
 - This was achieved by adding additional tank storage capacity
 - This is considered a temporary solution until the North Force Main passes the integrity test

- The water will continue to be trucked to MWTU Pond 3 until the north force main is operational
 - Integrity testing of the north and south force main pipes is still in progress
 - The test apparatus was rented and on site by the end of the month
 - Preparations were being arranged to initiate another round of testing
 - A draft proposal was prepared of the suggested alternate standard integrity test for the HDPE pipe section of the North Force Main
 - A pump test was conducted on MW6 to evaluate the pump system
- 6) Facility Refurbishment
- M3 was nearly complete with the final certification report on the facility buildings
- 7) Diesel Release
- A discussion was held with NMED on conditional approval of RGR's diesel release investigation
 - Remaining debris at the tank removal project was removed from the area
- 8) Closure Activities
- RGR met with NMED and MMD on 2/12/20 and 2/21/20 to discuss closure/closeout proposals and details
 - The meeting focused on the proposed disposal cell expansion and the need to update the closure/closeout schedule and plan
 - RGR's radiation consultant completed plans for scanning site materials for release
 - Material scanning began
 - Contractors and consultants were contacted to prepare for initiating closeout/closure activities

Forecasted Activities

- 1) MWTU Pond No. 2
 - Filling of pond 2 with water and performing the primary liner leak location survey
 - Anticipated for early 2nd quarter
- 2) Final Status Surveys (FSS) of MWTU Ponds 1, 4, 5, 6, 7, and 8
 - Anticipate conducting the "Final Status Surveys" on these ponds in March
- 3) Disposal Cell
 - Anticipate starting construction of the cover in 2nd quarter
 - Cold weather prevents achievement of compaction specifications
- 4) Ore Pile Removal
 - Anticipating 1 to 1.5 years to complete
- 5) Diesel Release Investigation
 - Awaiting plan approval by the NMED

Critical Path Items

- 1) Approval of eastward expansion of the disposal cell
 - This is a critical path due to the amount of contaminated soil still expected to be removed from the ore pad and ore pad retention pond, site debris and other yet-to-be identified contaminated soils on site