Addendum to the Closeout/ Closure Plan (CCP) for Revision of Mine Permit #C1002RE from Standby to Active Status, Mt. Taylor Mine; July 9, 2015

1. Additions to the CCP Rev.1 text, specifically to section 2.5, Future Mine Units; section 4.3, Surface Facilities Demolition; and section 7, Cost Estimate, as follows:

2.5 Future Mine Units

Both existing and future mine units were described in the original mine permit application (RGR 1994b). The only mine units not existing at this time (future mine unit) are the north waste rock pile and the Molybdenum/ Selenium (MoSe) treatment facility. The north pile will be constructed only if needed, and that need will not be determined until at least five years after the mine is reactivated. The MoSe treatment facility will be constructed during mine reactivation adjacent to and north of the existing IX plant. The MoSe treatment facility will be operated as needed to maintain Mo and Se concentrations below the New Mexico human health standards per 20.6.2.3103A NMAC while water is pumped from the mine.

4.3 Surface Facilities Demolition

The MoSe facility is added to the list of facilities that will not be retained for the later use of the landowner and will be demolished.

7.0 COST ESTIMATE

The estimated costs of closeout/ closure of the Mt. Taylor Mine were developed to satisfy the requirements of both MMD's CLOSEOUT PLAN GUIDELINES FOR EXISTING MINES, Attachment #4 (FINANCIAL ASSURANCE CALCULATION HAND BOOK) and its Guidance To Mine Operators for Calculating Reclamation Costs in Net Present Value, December 29, 2004 as well as NMED-GWQB's Discharge Plan Closure Guidance for Mines, May 30, 1996.

Several references were used for unit costs, the primary being R.S. Means Heavy Construction Cost Data 2013, the Wyoming DEQ Guideline No. 12, and the Caterpillar Performance Handbook. The basis for each unit cost is identified on the cost estimate spreadsheet.

Quantities of work and materials were based on field measurements or counts of materials, construction or design record drawings, and area/ volume calculation functions within AutoDesk AutoCAD Civil 3D® design software. A new base map, completed in June 2012 at 2.0-foot contour intervals, was used as the topographic base along with AutoCAD Civil 3D® design software for the earthwork estimates in this CCP.

The cost estimate does not include closure costs for the north waste pile. If this pile is needed, RGR will update the cost estimate to include costs related to closure of this facility. If the north waste pile is not needed and not constructed, the area reserved for this pile will be left undisturbed.

The cost estimate does not include any deductions or offsets for re-sale or salvage value of mine components and scrap. However, the value of these materials, especially the structural steel and the treated water pipeline, could offset one quarter to one third the actual direct cost of closeout.

Cost estimates for closeout of the IX facility are based on the conservative assumption that tubular materials (pipes) and debris internal to the IX circuit will contain scale or corrosion material with radiological contamination that cannot be removed, making it necessary to dispose of these materials as low-level radioactive waste in a licensed facility off-site (DOE 2002). Tubular materials (pipes) and debris internal to the MoSe circuit are not likely to contain scale or corrosion material with radiological contamination, so these materials will be disposed on-site with other similar material or recycled for off-site use. MoSe resins will be recycled to a permitted facility. Additional assumptions are that 1) the IX resin will be sent to a third party facility licensed by NRC or an Agreement State to process equivalent feed source material in the form of IX resin, and 2) the third party facility would accept title to the resin. The decontamination and demolition (D&D) costs for the IX circuit equipment are covered under the financial assurance requirement of the Radioactive Material License with the NMED Radiation Control Bureau and are not included in this estimate; only the IX structure is included in this estimate.

The detailed estimate is presented in Appendix E. The estimated costs by category are:

Direct Cost = \$ 5,135,745

Indirect Cost = \$2,516,515

Direct + Indirect Cost = \$7,652,260

Location Cost Adjustment=	0.879
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Total Adjusted Direct + Indirect = \$6,726,337

New Mexico Gross Receipts Tax \$441,416

Total Direct + Indirect, Location-adjusted, with NMGRT \$7,167,753

- 2. Changes to drawings MT13-CL-04 Rev.2, -07 Rev.2, and -13 Rev.2 to show the location of the MoSe facility, attached in pdf format
- 3. Change to Table 5.1, Building Inventory, to include the MoSe building, attached in pdf format.
- 4. Rev.2 of the Cost Estimate (Appendix E) to include the cost to remove the MoSe facility. Attached in pdf.





