



**Lance M. Hauer, P.E.**  
Legacy Site Team Leader

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October 11, 2022

Joseph Fox  
Acting Program Manager  
Mining Environmental Compliance Section  
New Mexico Environment Department  
1190 St. Francis Drive  
P.O. Box 5469  
Santa Fe, New Mexico 87502-5469

Dear Mr. Fox:

United Nuclear Corporation (“UNC”) is submitting a request for modification of the Stage 2 Abatement Plan for the St. Anthony Mine (“Modified Stage 2 Plan”) to the New Mexico Environmental Department, Mining Compliance Section (“NMED”). The Modified Stage 2 Plan and associated attachments, including a 30% Closure Closeout Plan for the proposed reclamation of the St. Anthony Mine (“30% CCOP”), may be accessed through the following Dropbox link: <https://www.dropbox.com/sh/dg5y3zt0yoyrnu0/AADIK5p8fAWod9WnFX2U3EuZa?dl=0>. This link will be available to download the documents until November 1, 2022. In addition, and consistent with UNC’s prior discussions with NMED, two copies of the Modified Stage 2 Plan are also being sent to NMED by Federal Express.

With this submittal, UNC understands that NMED will initiate their technical review of the Modified Stage 2 Plan and the public notice process set forth in 20.6.2.4108 NMAC. On June 27, 2022, UNC submitted the Modified Stage 2 Plan in draft form to NMED and the Mining and Minerals Division of the New Mexico Energy, Minerals, and Natural Resources Department’s (“MMD”) (collectively “Agencies”). On August 18<sup>th</sup>, UNC received a joint letter from the Agencies deeming the draft documents administratively complete upon their submittal in final form with the requisite application fees and a schedule of activities. On September 6<sup>th</sup>, following a meeting among UNC and the Agencies held on September 2<sup>nd</sup>, the Agencies issued a joint letter to UNC requesting final submittal of the Modified Stage 2 Plan and 30% CCOP by October 14<sup>th</sup>.

On September 19<sup>th</sup>, UNC emailed NMED the attached draft public notice for review and approval, as well as a request pursuant to 20.6.2.4108.B.2 NMAC, for NMED to provide a list of persons who have requested notification. Within 30 days following NMED’s approval of the draft public notice and NMED’s provision of a list of persons that have requested notification, UNC will proceed with issuing the public notice and notifying those persons identified as having requested notification or that are otherwise identified in 20.6.2.4108 NMAC.

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Please contact the undersigned if you have any questions or would like to discuss in further detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance M. Hauer". The signature is written in a cursive style with a large initial "L".

Lance M. Hauer, P.E.  
Legacy Site Team Leader

Cc: Cynthia Ardito, INTERA  
Melanie Davis, Stantec  
Monique Mooney, GE  
Chad Baker, Parsons Behle & Latimer

**Draft**

**PUBLIC NOTICE**

**Request for Modification of Stage 2 Abatement for the former St. Anthony Uranium Mine, Cibola County, New Mexico**

**NOTICE** is hereby provided that United Nuclear Corporation, PO Box 1088, Gallop, NM 87305-1088, (UNC) has filed a Request for Modification of the Stage 2 Abatement Plan for the former St. Anthony uranium mine located on the Cebolleta Land Grant, Cibola County, New Mexico (St. Anthony Mine) with the **NEW MEXICO ENVIRONMENT DEPARTMENT (NMED)**. The St. Anthony Mine is located in Sections 19, 20, 24, 29 and 30, Township 11 North, Range 4 West, and Section 24, Township 11 North, Range 4 West, New Mexico Principal Meridian, approximately three miles west-southwest of Moquino and approximately 13 miles north of Laguna Pueblo. A more precise location of the facility in latitude and longitude decimal degrees is: 35.16213° north and 107.30531° west.

NMED conditionally approved a Stage 2 Abatement Plan for the St. Anthony Mine on May 8, 2015, and the New Mexico Water Quality Commission approved Alternative Abatement Standards (AAS) for the 2015 Stage 2 Abatement Plan on September 29, 2017. The 2015 Stage 2 Abatement Plan contemplated a partial backfill of Pit 1 at the St. Anthony Mine that would have eliminated the current hydraulic sink that captures groundwater flowing through the Jackpile Sandstone of the Morrison Formation. Further study indicates that the 2015 Stage 2 Abatement Plan is infeasible because elimination of the hydraulic sink will result in migration of ore-influenced water into unimpacted water-bearing units over time. Accordingly, UNC is proposing a modification of the 2015 Stage 2 Abatement Plan to maintain the hydraulic sink by reducing the elevation of the partial backfill material in Pit 1. The Modification will prevent migration of water away from Pit 1. The AAS associated with the 2015 Stage 2 Abatement Plan will be retained. No other changes to the Stage 2 Abatement Plan are proposed in UNC's Request for Modification of the Stage 2 Abatement Plan.

The Secretary of the NMED will review the submission, timely received written comments, and information submitted at any public meeting or hearing on the Modified Stage 2 Abatement Plan, as applicable. NMED will accept written comments from the public on the proposed Modification and requests for a public meeting or hearing through **<60 days from notice; insert date>**. Written requests for a public notice or hearing should include the reason(s) why a public meeting or hearing is being requested and the issues to be raised should a meeting or hearing be held.

Interested parties may view the Modified Stage 2 Abatement Plan for the St. Anthony Mine and submit written comments or request a public meeting or hearing by contacting:

NMED Ground Water Quality Bureau  
Harold Runnels Building, Room N2250  
1190 South St. Francis Drive  
Santa Fe, New Mexico 87502  
<insert name>  
(505) <insert #>

A copy of the Modified Stage 2 Abatement Plan may also be viewed by interested parties at:

NMED Ground Water Quality Bureau  
Grants Field Office  
900 Mount Taylor Road  
Grants, New Mexico 87020