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Via Electronic Mail

David J. (DJ) Ennis, P.G.  
Program Manager, Mining Act Reclamation Program  
New Mexico Mining and Minerals Division  
david.ennis@state.nm.us

**Re: Supplemental Characterization Work Plan  
Section 27 Mine, McKinley County**

Dear Mr. Ennis:

On behalf of United Nuclear Corporation (“UNC”), I am submitting a Supplemental Characterization Work Plan for the Section 27 Mine (“Work Plan”). UNC prepared the Work Plan at New Mexico Mining and Minerals Division’s (“MMD”) request to present the proposed additional characterization efforts to obtain site data. This characterization work will support revising UNC’s 2011 Supplemental Closeout Plan (“SCP”) for additional on-site reclamation as needed to meet the radiation cleanup criteria set forth in the agencies’ Joint Guidance for the Cleanup and Reclamation of Existing Uranium Mining Operations in New Mexico (March 2016).

As we discussed and agreed to at our meeting on May 26, 2023, UNC will delineate mine-related impacts to the west of the Section 27 Mine to the border of DOE’s remediation area of the former Phillips Mill. In addition, because UNC is negotiating a scope of work with EPA to conduct a Removal Site Evaluation at UNC’s former mines on Section 34 (i.e., John Bully and Sandstone), UNC will delineate Section 27 mine-related impacts to the section line border between Section 27 and Section 34, if necessary, and will not extend work onto Section 34.

While UNC is willing to implement the Work Plan, it is imperative that a mechanism is established to ensure that the work UNC completes in this regard satisfies the requirements of EPA and moots the need for additional work under CERCLA with respect to the issues addressed. Therefore, UNC requests that MMD obtain EPA’s concurrence that the Work Plan meets their CERCLA requirements. UNC will require EPA’s concurrence before proceeding with the characterization efforts.

Please contact me if you would like to discuss the Work Plan. Thank you for your continued attention to this matter.

Sincerely,



Lance Hauer  
GE Global Operations, EHS

cc: Clint Chisler, MMD  
Gabriel Wade, MMD  
Anne Mauer, NMED  
Cindy Ardito, INTERA  
Kelly Johnson, Stantec  
Monique Mooney, UNC  
Kate Campbell, Manko Gold