

Closure Activity Update: April 2020

RGR continued its planning phase of the Closeout/Closure activities. RGR continued work on preparing the DP-61 renewal application and updating the Closeout/Closure plan schedule. Discussions regarding the PMLU continued.

RGR submitted the proposal for the post-closure ground water monitoring of the deep aquifers.

The onset of the Corona virus in the area heavily impacted RGR's work during the month of April. At the beginning of the month, all work at the facility was shut down, including ore removal operations and Closeout/Closure activities. By mid-month, a minimal crew was brought back on site. The ore removal and Closeout/Closure activities were restarted on a limited basis.

Activities

1) MWTU Pond No. 2

- Pond 2 was filled with clean water by mid-month (approximately 1.8 million gallons).
- The leak location survey was performed.
- Primary power supply was completed for the sump pump.

2) MWTU Ponds 1, 4, 5, 6, 7, and 8

- Analytical results for the Final Status Surveys (FSS) were not available by the end of the month.
- The single hotspot in MWTU Pond 1 was cleaned up and a FSS was performed.

3) Ore Pile Removal

- Removal and transportation of the ore pile material continued. An average of 4 trucks per day operated 4 days per week. This reduced schedule was put in place in response to the COVID virus.
- The trucking firm lost one driver and hired a replacement driver

4) Disposal Cell Liner and Waste Rock Pile (WRP, existing)

- Planning continued to begin hauling and placing the cover soil.

5) WP5 Well, MW6 Well and North and South Force Mains

- The WP5 well continued to pump on a fully automatic cycle.
- The MW6 well continued to be pumped on a fully automatic cycle.
 - The original sampling pump failed and was replaced.
 - The replacement pump is a more robust model, designed for the well conditions.
- After 5 attempts to pass the integrity test, RGR made plans to redesign the South Force Main system.
- The North Force Main steel pipe section passed the integrity test.
 - The HDPE section of the North Force Main has not yet passed the integrity test.

6) Diesel Release Investigation

- RGR submitted a response to NMED's comment letter regarding the diesel investigation.
 - RGR proposed using a geophysical survey (electrical conductivity) to identify ground water flow paths in the diesel investigation and abatement areas.

7) Closeout/Closure Activities

- Continued work on preparing the DP-61 renewal application and updating the Closeout/Closure schedule.
- Continued with radiological surveys of site debris for cleanup.
- Continued sorting debris piles for disposal.
- Submitted a proposal for post closure monitoring of the deep aquifers.
- General facility upkeep involved pumping of abatement wells, cleaning storm drains and water control structures, performing dust control and maintaining access roads.
- Repaired and replaced erosion blankets around the WRP and SSWP.
 - High winds at the end of March damaged several blankets.
- Submitted the first quarter 2020 Active Status Report and the 2019 Annual Report

Forecasted Activities

1) MWTU Pond No. 2

- Installing the sump pump - Anticipated for May – June 2020, depending on availability

2) Final Status Surveys (FSS) of MWTU Ponds 1, 4, 5, 6, 7, and 8

- Anticipating FSS reports to be completed in May

3) Disposal Cell

- Anticipate starting construction of the cover in late 2nd quarter 2020

4) Ore Pile Removal

- Anticipating 11 to 13 months to complete

5) Diesel Release Investigation

- Anticipating starting the geophysical study in late May
- Awaiting approval of the additional groundwater sampling list by NMED (May)

Critical Path Items

1) Approval of eastward expansion of the disposal cell

- Anticipating late 2020