

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Michelle Lujan Grisham**  
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Acting Deputy Secretary

**Albert C.S. Chang, Director**  
Mining and Minerals Division



February 4, 2025

Lance Hauer, P.E.  
Legacy Site Team Leader – Environmental Remediation  
General Electric Company  
1 River Road  
Schenectady, NY 12345-6000

**RE:    *Technically Complete Letter with comments on St. Anthony Mine Site Closure-Closeout Plan (CCOP), 30% Design Report, United Nuclear Corporation/GE, St. Anthony Mine, Cibola County, New Mexico, Permit Tracking No. MK006RE***

Dear Mr. Hauer,

The Mining and Minerals Division (MMD) received and reviewed the *St. Anthony Mine Site Closure-Closeout Plan, 30% Design Report*, (Closeout Plan) dated October 7, 2022. The initial comments were submitted to UNC by MMD and the agencies on May 8, 2023 with subsequent response from UNC on August 30, 2023. The 2<sup>nd</sup> round of comments from MMD and the Agencies were submitted to UNC on February 7, 2024 with response from UNC on July 30, 2024.

MMD hereby deems the *St. Anthony Mine Site Closure-Closeout Plan (CCOP), 30% Design Report* and subsequent submittals Technically Complete and is in support of moving forward to the 90% Design. Additionally, at this time, MMD will start drafting the permit document for Permit No. MK006RE.

**Comments on Responses found in the attached spreadsheet:**

8. Please confirm that the 90% CCOP will include a 500 -year return event design as previously discussed.

A5. Please confirm the addition of a certain percentage of gravel for increased rock content in the cover system to be included in the Construction Quality Assurance Plan (CQAP).

General Comment 1. MMD considers the 30% CCOP level of design as Technically Approvable, therefore an updated Financial Assurance Estimate is required. Once the FA Estimate is reviewed and approved by MMD, a permit for implementation will be issued. One of the permit conditions will be a requirement to submit a CQAP. MMD believes that the CQAP is what UNC is calling the 90% CCOP.

**RE: Technically Complete Letter with comments on *St. Anthony Mine Site Closure-Closeout Plan (CCOP)*, 30% Design Report, United Nuclear Corporation/GE, St. Anthony Mine, Cibola County, New Mexico, Permit Tracking No. MK006RE**

**February 4, 2025**

**Comments on Responses found in supplemental submittals:**

UAV-Based Radiological Surveys of the St. Anthony Mine Pit-1 Sidewalls

- No further comments

St. Anthony Mine, United Nuclear Corporation 2023 Revegetation Plan

- No further comments

Pit 1 Backfill and Design Concept

- No further comments

Ecological Risk Assessment

- No further comments

Please contact Clint Chisler from MMD with any questions or concerns and to set up a follow-up meeting regarding UNC's response to these comments at (505) 467-9589 or by email at [clinton.chisler@emnrd.nm.gov](mailto:clinton.chisler@emnrd.nm.gov).

Sincerely,



Clint Chisler  
Permit Lead

Attachments: NMED GWQB and SWQB final comments

cc: DJ Ennis, MMD  
Amber Rheubottom, NMED  
  
Mine File (MK006RE)



## MEMORANDUM

Date: January 21, 2025

To: David Ennis, Program Manager, Mining Act Reclamation Program

Through: Amber Rheubottom, Team Leader, Mining Environmental Compliance Section

From: Amber Rheubottom, Site Lead  
Alan Klatt, Surface Water Quality Bureau

Subject: **30% Closure/Closeout Plan (CCOP) Response to Comments Round 2, St. Anthony Mine, United Nuclear Corporation/General Electric, McKinley County, New Mexico Mining Act Permit No. MK006RE**

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The New Mexico Environment Department (NMED) received correspondence from the Mining and Minerals Division (MMD) on July 30, 2024, providing United Nuclear Corporation/General Electric (UNC) response to the second round of NMED comments on the 30% Closure/Closeout Plan for the St Anthony Mine. NMED reviewed UNC's response and provides the following comments.

### **Surface Water Quality Bureau**

The Surface Water Quality Bureau comments are attached.

### **Mining Environmental Compliance Section (MECS)**

MECS has no additional comments and looks forward to the review of the 90% CCOP where its comments will be addressed in detail.

### **NMED Summary Comment**

David Ennis  
St. Anthony Mine, MK006RE  
January 21, 2025  
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NMED will withhold issuance of the environmental determination until such time there is agreement between UNC, NMED and MMD on how to proceed with approval of the 90% CCOP and the Stage 2 Abatement Modification.

If you have any questions, please contact Amber Rheubottom at 505-660-2379 or [amber.rheubottom@env.nm.gov](mailto:amber.rheubottom@env.nm.gov).

cc: Joe Fox, Program Manager, MECS  
Shelly Lemon, Bureau Chief, NMED-SWQB  
Clint Chisler, Lead Staff, EMNRD-MMD



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

## Environment Department Internal Memorandum

DATE: January 8, 2025

TO: Amber Rheubottom, Mining Environmental Compliance Section, Ground Water Quality Bureau

FROM: Alan Klatt, Watershed Protection Section, Surface Water Quality Bureau

SUBJECT: **Request for Comments, St. Anthony Mine, 30% Closure/Closeout Plan Response to Comments Round 2, United Nuclear Corporation, Cibola County, New Mexico, Mining Act Permit No. MK006RE**

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The New Mexico Environment Department-Surface Water Quality Bureau (NMED-SWQB) reviewed United Nuclear Corporation's (UNC) "Response to 2<sup>nd</sup> Round of Comments" dated March 12, 2024 to the 30% Closure/Closeout Plan (CCP) and has no further comments at this time. UNC has responded that the 90% CCP may address a number of agency comments. NMED-SWQB will review the 90% CCP and may have new comments at that time.