

From: [Ross, Sandra](#)
To: [Lancaster, Thomas](#)
Cc: [Applegate, Kent](#)
Subject: [External_Sender] SUA 1473 - Deferral of Monthly Monitoring in Response to COVID-19
Date: Thursday, April 16, 2020 7:27:09 PM
Attachments: [image001.png](#)

Hi Tom,

In response to the COVID-19 pandemic and in accordance with New Mexico Public Health Orders, Rio Algom Mining LLC (RAML) has implemented a number of precautionary controls to minimize the potential for COVID-19 exposures in our work force and the surrounding community. These measures include minimizing operations, staff, and visitors to site to the extent possible. RAML has also implemented screening, social distancing, PPE, hygiene, and other protocols.

RAML takes its environmental compliance obligations seriously, but as part of our pandemic response, we are taking a hard look at the activities that typically occur at site to determine if they are essential or if they could be deferred. Among those activities we are reviewing is the requirement under LC-34 for monthly sampling of molybdenum from 32-45 KD-R and gross alpha from 36-06 KD, 31-02 TRB-R, and 32-45 KD-R. Based on a review of the historical data, the absence of these data should not limit technical understanding and will not present a risk to human health or the environment.

The monthly sampling requires two individuals to travel from Albuquerque to site (~90 miles) and portions of the sampling protocol make it difficult to maintain social distancing (=6 feet separation between individuals). RAML understands that at least one other operator in the area has experienced COVID-19 exposures during similar sampling events.

Given the unusual circumstances presented by the pandemic, RAML requests your consideration as to whether monthly sampling pursuant to LC-34 is essential. RAML proposes not collecting samples in April or May with the intention of resuming monthly sampling in June.

**Sincerely,
Sandra**



Sandra L. Ross, P.G.
Manager US Legacy Assets
Technical Centre of Excellence and Legacy Assets
916-947-7637
sandra.ross@bhp.com

Creating a flexible workplace is a priority for us at BHP. If you receive this email outside of your work hours, please feel free to respond when you are back online.

This message and any attached files may contain information that is confidential and/or subject of legal privilege intended only for use by the intended recipient. If you are not the intended recipient or the person responsible for delivering the message to the intended recipient, be advised that you have received this message in error and that any dissemination, copying or use of this message or attachment is strictly forbidden, as is the disclosure of the information therein. If you have received this message in error please notify the sender immediately and delete the message.