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August 5, 2022

Mr. Ian Hewitt Office of the State Engineer, District I 5550 San Antonio Dr., NE Albuquerque, New Mexico 87109-4127

RE: Homestake Mining Company - Grants Reclamation Project Well 986 (B-700)
Abandonment Variance

Mr. Hewitt,

Homestake Mining Company (HMC) is requesting a variance from the previously approved plugging plan for Well 986 (B-700). The approved plugging plan required perforations to be placed from 355' to 415' below ground level (bgl) following the placement of cement from the bottom of the borehole up to 420' bgl. This variance request proposes that no additional perforations be placed from 400' to 355' bgl and that the casing be perforated from 85' to 45' bgl followed by placement of neat cement via tremie pipe to the surface. No change to the approved neat cement mixture is proposed as part of this variance. As articulated in the following paragraphs, the proposed variance would achieve the primary goal of effectively sealing off the San Andreas Glorieta (SAG) aquifer from overlying water-bearing formations.

On July 27, 2022, HMC started the process of abandoning Well 986 (B-700). Fifty-three gallons of neat cement, 2 total batches, were placed via tremie pipe set initially at 460' bgl. Following the cement placement, the depth to the top of the cement was measured at 432' bgl on July 28, 2022. During the initial perforations from 420' to 400' bgl, the air pressure from engaging the perforator forced air and water up through the annulus of the borehole to the surface and started to wash out the soil around the casing. Following concerns with the stability of the drill rig next to a collapsing hole, on August 2, 2022, 724 gallons of grout mixed to specification in 28 batches was placed into the annulus via tremie pipe at a depth of 23 feet to provide solid footing for the rig to finish the perforations. No grout was observed at the surface as the result of placing grout in the annulus. On August 3, 2022, the total depth in the 5" casing was measured at 88' bgl.

The attached well record shows an original annulus size of 8" and a casing size of 5". It also does not indicate whether the annulus above the gravel packed screen was grouted or not. Assuming a cylindrical borehole, the theoretical volume of grout needed for the 5" casing from 432' to 88' bgl is 350 gallons. The theoretical volume necessary to fill an 8" borehole with grout from 432' to 88' bgl is 897 gallons. The difference between volume placed and the theoretical volume for the 8" borehole is likely explained by volume taken up by 5" steel casing and any grout or gravel placed between the annulus and casing.

As shown in the attached lithologic log for the well, the top of the SAG formation is encountered at 434' bgl. Thus, the requested variance still provides a perforated and

grouted interval above the contact between the SAG and the overlying Chinle formation and would be protective from potential impacts from the alluvial aquifer. The additional perforations from 85' to 45' bgl would ensure that a quality seal is placed across the contact of alluvium and the Chile formation, which according to the log is at 65' bgl.

Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at bbingham@homestakeminingcoca.com or via phone at 505.290.8019.

Respectfully,

Brad R. Bingham

Closure Manager

Homestake Mining Company, Grants, New Mexico Office: 505.287.4456 x35 | Cell: 505.290.8019

Attachment

ec: Document Control Desk, NRC, Washington, DC

R. Linton, NRC, Rockville, Maryland M. Purcell, Region VI EPA, Dallas, Texas A. Maurer, NMED, Santa Fe, NM W. Frazier, DOE, Grand Junction, Colorado

Attachment 1 – Well Record for Well 986 (B-700)

STATE ENGINEER OFFICE

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WELL RECORD	

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Section 6. LOG OF HOLE

	in Feet	Thickness	Color and Type of Material Encountered
From	То	in Feet	
0	55	55	tan sandy shale
55	65	10	silt & fine gravel
65	85	20	red shale
85	110	25	hard blue lime
110	365	255	red & purple shale
365	395	30	hard blue & gray limestone
395	405	10	red shale
405	415	10	hard sandy white shale
415	430	15	hard white sandstone
430	434	4	blue & yellow shale
434	467	33	hard frac. yellow sandstone
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Section 7. REMARKS AND ADDITIONAL INFORMATION

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller