

Appendix 1.2-A
2020 Annual Monitoring Report/Performance Review

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GRANTS RECLAMATION PROJECT
LAND USE REVIEW / SURVEY

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Grants Reclamation Project

Land Use Review / Survey ***Annual Report No. 19 - CY2020***

1.0 Background

As part of Amendment 34 to the Grants Reclamation Project Radioactive Materials License – SUA-1471-Docket 40-8903 (approved June 19, 2002), License Condition (LC) 42 was amended to require submittal of a land use survey with the License annual report to NRC. This report is the nineteenth annual land use review / survey pursuant to LC 42.

The general focus of the land use survey is to document and summarize the current land uses and any identified changes to land use in proximity to the Grants Reclamation Project. In particular, land use activities for those areas proximal to the tailings pile areas undergoing reclamation and closure and immediate surrounding areas where ongoing ground-water restoration continues to be reviewed.

2.0 2020 – Land Use – Homestake Properties

Homestake Mining Company of California (HMC) owns and controls a sizeable land area in and around the Grants Reclamation project. Over the last number of years, additional lands have been acquired as opportunity has arisen and acquisition of such lands are deemed appropriate in relation to ongoing ground-water remediation and restoration activities and final reclamation / closure of the site.

Much of the HMC lands held in the area that are not in immediate proximity to the tailings pile complex have been, and are continuing to be, utilized for livestock grazing on a lessor/lessee tenant arrangement. Much of the current land area within the immediate Site Boundary area containing the evaporation ponds, RO plant and both tailings pile areas and office / shop compound have been excluded from livestock grazing and other land use except those directly related to the ongoing ground-water restoration activities. These areas have been livestock fenced to exclude grazing.

Several small lot / small acreage parcels [e.g. residential lot(s)] held by HMC in the general area of the reclamation site are idle and are essentially not in use except in certain instances where treated and/or fresh water injection and water collection is underway as part of the ongoing groundwater restoration program

or are under agricultural use on selected lot(s). For example, Block 1 Lot 5 and Block 2 Lot 2 in Murray Acres were planted and irrigated in 2008 through 2020 with the Murray Acres San Andres irrigation well.

3.0 2020 – Land Use – Pleasant Valley Estates, Murray Acres, Broadview Acres, Felice Acres and Valle Verde Residential Subdivisions

Aside from the land uses on HMC land in the Grants Reclamation Project area described in the previous section above, the other major land use immediately proximal to the Site consists of residential development located in the Pleasant Valley Estates, Murray Acres, Broadview Acres and Felice Acres residential subdivisions. By way of background, HMC provided these subdivision areas with a potable water supply system as an extension of the Village of Milan water supply in the mid-1980's. The Village of Milan water supply extension to these areas was provided at that time to address a concern over the quality of groundwater used for domestic purposes in these adjacent subdivision areas. HMC paid for the water usage from the Village of Milan for the first ten years and re-started paying for the water usage in late 2018.

An assessment of current land use in these four subdivision areas was undertaken in December 2020 to provide an annual review of the present uses, occupancy and status for the various lots within these subdivisions. Over the years, permanent residential homes, modular homes and mobile homes have been established in the subdivision areas, and immediate adjacent areas, as would typify a rural residential neighborhood. A number of lots remain vacant, or are utilized for uses such as horse barns, corrals, equipment storage, etc. In some cases, dwellings are present on several lots throughout the subdivisions but are currently vacant or have been permanently abandoned and in various states of disrepair.

This year, the annual review also included an assessment of the residential areas adjacent to Felice Acres, Pleasant Valley Estates and the Valle Verde residential areas and adjacent lots as was done for 2006 through 2019 surveys.

The primary issue of concern in the subdivision areas is to determine whether current occupied dwellings are utilizing water service from the Village of Milan system for potable water consumption and not private wells, particularly private domestic wells that are completed into the underlying shallow alluvial aquifer.

The survey conducted in December 2020 consisted of first obtaining the records and customer database from the Village of Milan water district. This information was reviewed to prepare a separate residential customer database for the subdivisions that would reflect the lot number, customer, water meter customer

ID number and whether the customer utilized Milan water during 2020. See Tables E-1 through E-5 for 2020 database information.

A lot-by-lot reconnaissance was made in each of the subdivisions to determine whether each lot was occupied or vacant, contained a residence(s), and which residences are currently occupied. This information was then checked against the database to determine whether each occupied residence is supplied and metered through the Village of Milan water supply system. Results of this reconnaissance effort are summarized on the subdivision plat maps; see attached Figures E-1 through E-5.

Field review of the subdivisions areas, along with follow-up inquiries as required to confirm the status of water use at each property, indicates that occupied residential sites in, or immediately adjacent to the Felice Acres, Broadview Acres, Murray Acres, Pleasant Valley and Valle Verde subdivisions are on metered water service with the Village of Milan.

In the Valle Verde residential area and immediately adjacent to the subdivision, the one residence that was not on the Village of Milan water supply system in prior surveys was connected to the Milan water system in July, 2020.

4.0 New Milan Water Hook-Ups

Homestake (HMC) and the New Mexico Environment Department - Superfund Oversight Section entered into and executed a Memorandum of Agreement (MOA) in January 2009 regarding private well supplies utilized for domestic household use in the area. The MOA established an Area of Concern (AOC) wherein those residences within the area that are not on the Village of Milan water supply for domestic potable water use should be contacted and given the opportunity to be hooked up to that supply with HMC covering the cost of the hook-up. As of December 2020, no residences within the MOA Area of Concern (AOC) are pending with respect to a domestic water supply hook-up to the Village of Milan municipal water supply.

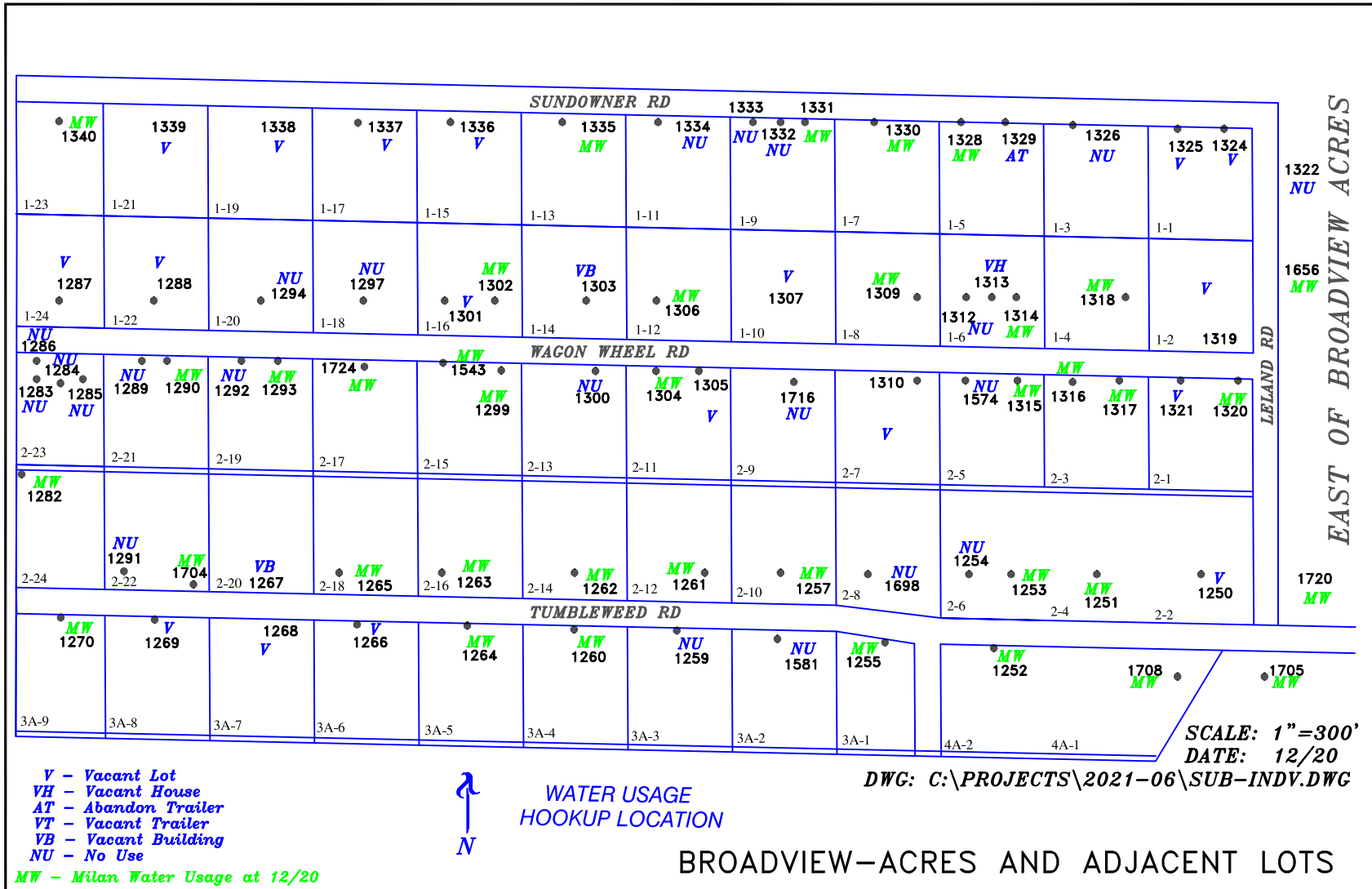
The last significant facet of the MOA addresses the concern with regard to an offer by HMC to residential property owners in the AOC to arrange for and pay for plugging and abandonment of private wells in the area. No private wells were abandoned as part of this MOA. Through public outreach to residents in the nearby neighborhoods, HMC is again offering to abandon private wells.

5.0 Conclusion

The review of land use for HMC properties and the five residential subdivision areas to the south and west of the Grants Reclamation Project site indicates that present land uses in the area have not changed significantly. As a result of the annual survey of the residential areas within the Memorandum of Agreement (MOA) Area of Concern (AOC) during 2020, no residential properties remain to be addressed in terms of providing a domestic water supply hook-up. Survey results indicate that all other water users in the AOC area are supplied by the Village of Milan water supply.

This land use survey / review is completed on an annual basis to meet annual license condition reporting requirements under the NRC License. This will help in assuring that land use activities in the immediate area surrounding the Grants project are regularly reviewed and assist in determining that those uses do not present a new concern with local ground-water usage until project ground-water restoration activities are completed.

FIGURE E-1. BROADVIEW ACRES—LAND USE STATUS AND WATER USE
E-5



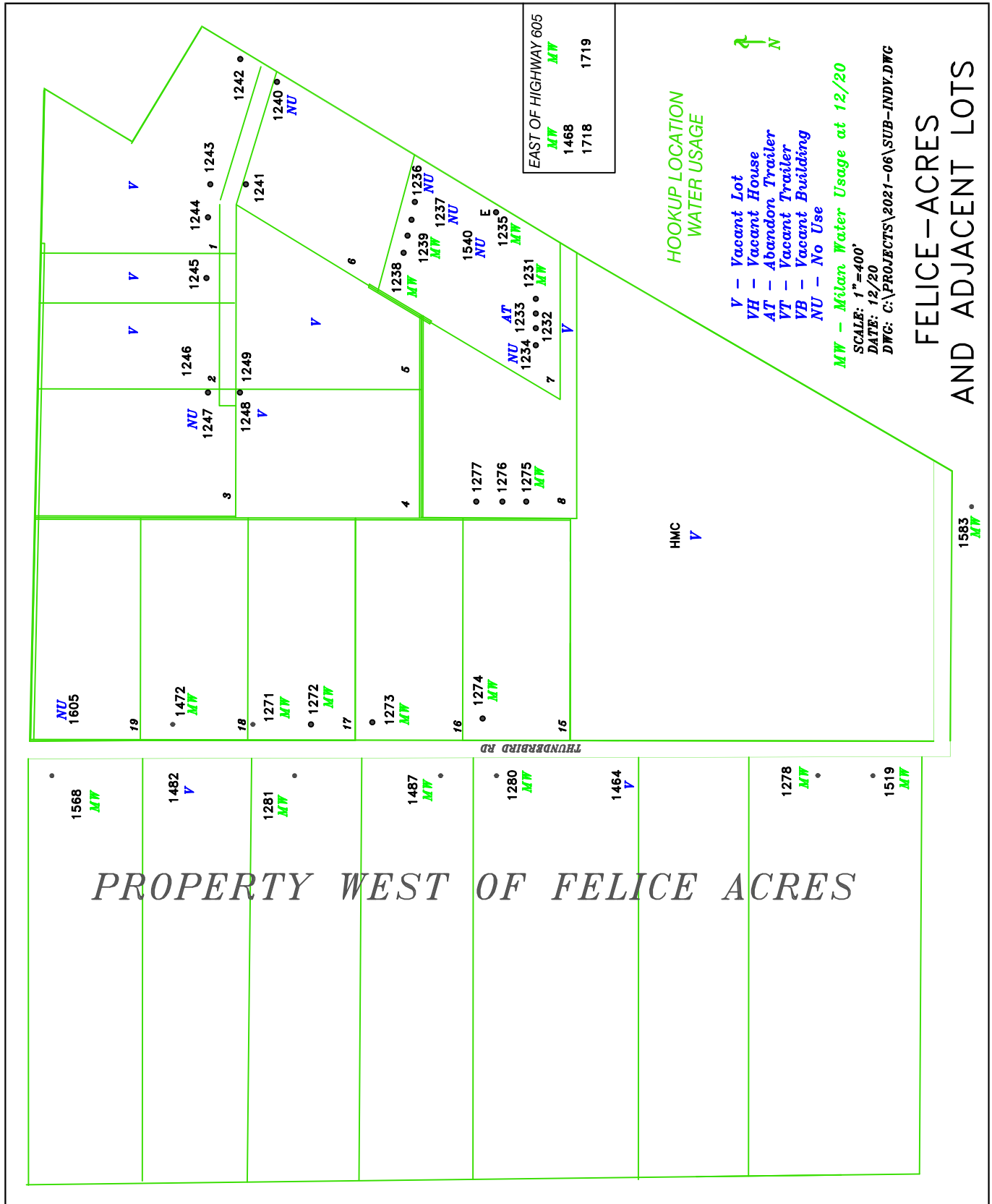


FIGURE E-2. FELICE ACRES - LAND USE STATUS AND WATER USE
 E-6

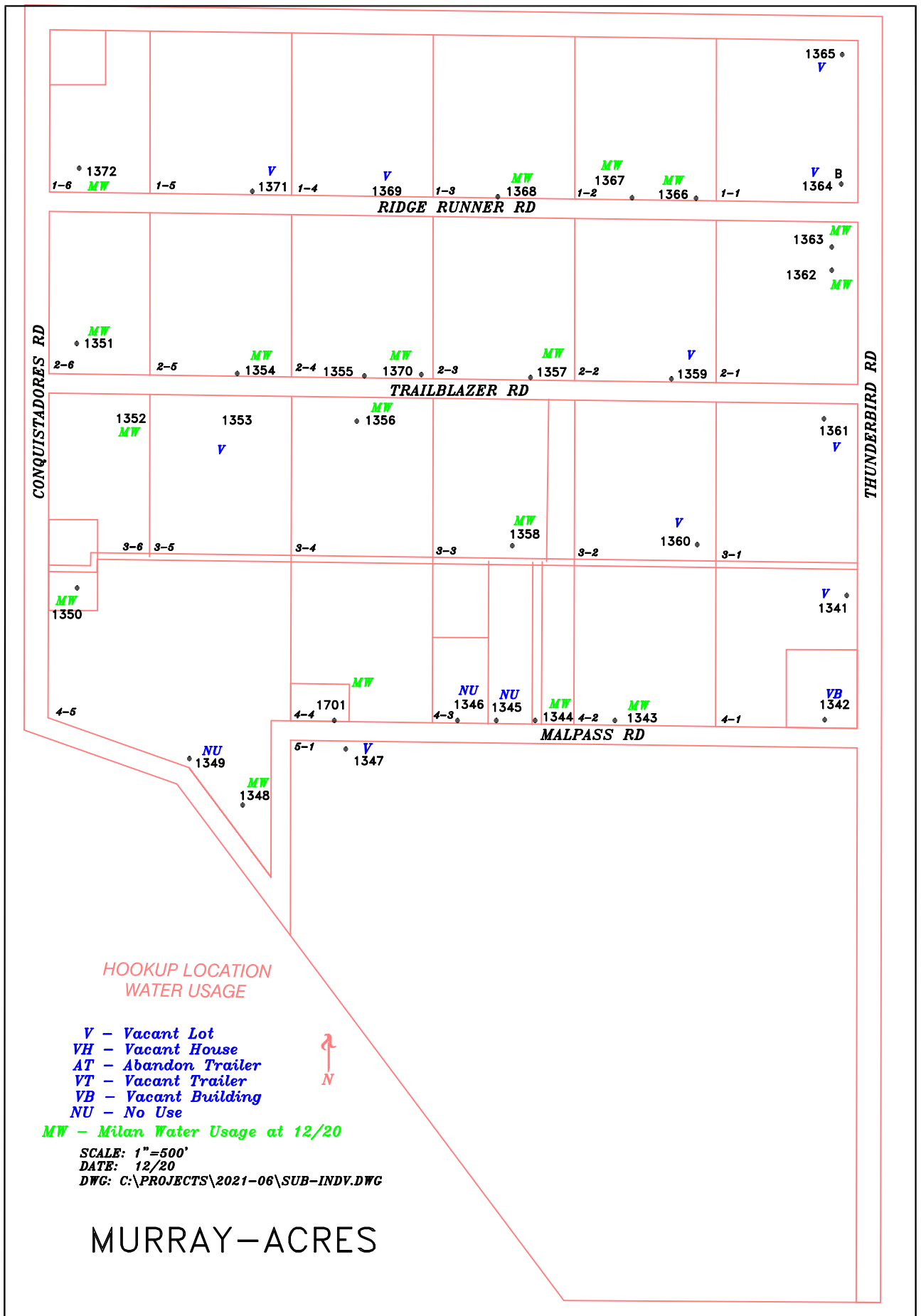


FIGURE E-3. MURRAY ACRES—LAND USE STATUS AND WATER USE
E-7

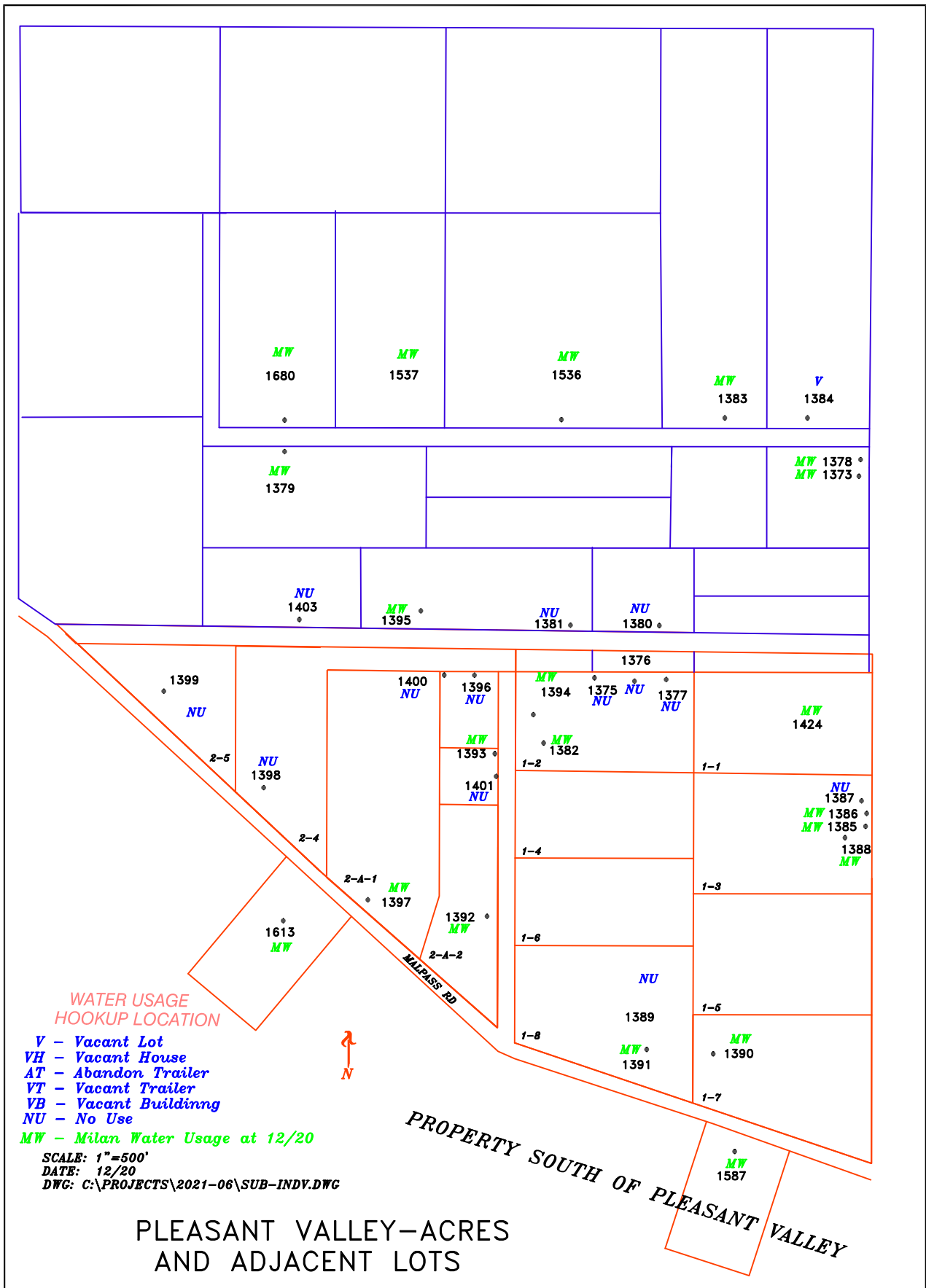


FIGURE E-4. PLEASANT VALLEY ESTATES-
 LAND USE STATUS AND WATER USE

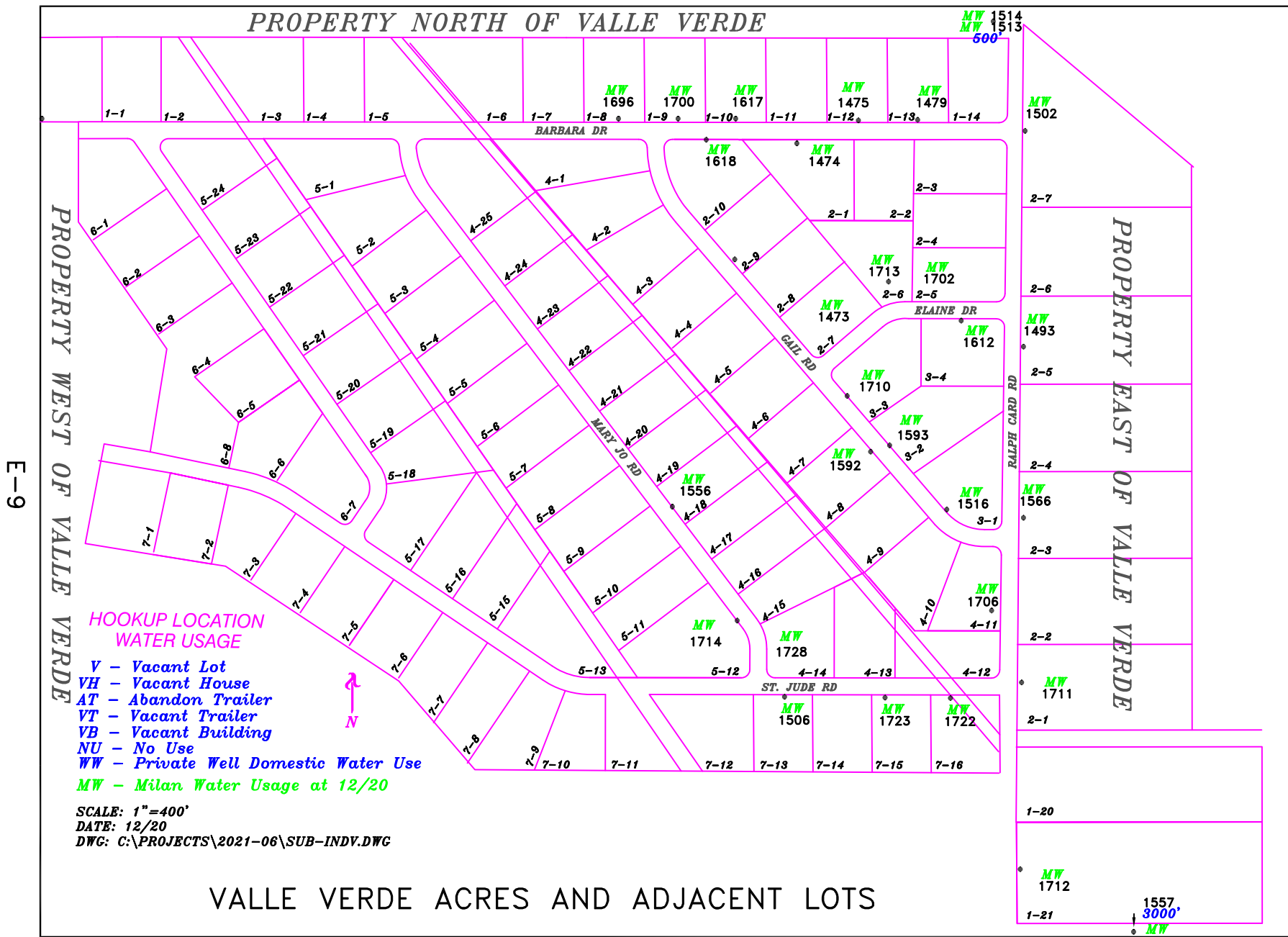


FIGURE E-5. VALLE VERDE ACRES—LAND USE STATUS AND WATER USE

TABLE E-1 WATER USE OF MILAN WATER IN BROADVIEW ACRES AND ADJACENT LOTS

SUBDIVISION BLOCK / LOT	CUSTOMER NUMBER SITE ID	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2019 WATER USAGE	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2020 WATER USAGE
1 / 1	1324		
1 / 1	1325		
1 / 2	1319		
1 / 3	1326		
1 / 4	1318	X	X
1 / 5	1328	X	X
1 / 5	1329		
1 / 6	1312		
1 / 6	1313		
1 / 6	1314	X	X
1 / 7	1330	X	X
1 / 8	1309	X	X
1 / 9	1331	X	X
1 / 9	1332		
1 / 9	1333		
1 / 10	1307		
1 / 11	1334		
1 / 12	1306	X	X
1 / 13	1335	X	X
1 / 14	1303		
1 / 15	1336		
1 / 16	1301		
1 / 16	1302	X	X
1 / 17	1337		
1 / 18	1297		
1 / 19	1338		
1 / 20	1294		
1 / 21	1339		
1 / 22	1288		
1 / 23	1340	X	X
1 / 24	1287		
2 / 1	1320	X	X
2 / 1	1321		
2 / 2	1250		
2 / 3	1316	X	X
2 / 3	1317		X
2 / 4	1251	X	X

TABLE E-1 WATER USE OF MILAN WATER IN BROADVIEW ACRES AND ADJACENT LOTS

SUBDIVISION BLOCK / LOT	CUSTOMER NUMBER SITE ID	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2019 WATER USAGE	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2020 WATER USAGE
2 / 5	1315	X	X
2 / 5	1574		
2 / 6	1253	X	X
2 / 6	1254		
2 / 7	1310		
2 / 8	1698		
2 / 9	1308		
2 / 10	1257	X	X
2 / 11	1304	X	X
2 / 11	1305		
2 / 12	1261		X
2 / 13	1300		
2 / 14	1262	X	X
2 / 15	1299	X	X
2 / 15	1543	X	X
2 / 16	1263	X	X
2 / 17	1724	X	X
2 / 18	1265	X	X
2 / 19	1292		
2 / 19	1293	X	X
2 / 20	1267		
2 / 21	1289		
2 / 21	1290	X	X
2 / 22	1291		
2 / 22	1704	X	X
2 / 23	1283		
2 / 23	1284		
2 / 23	1285		
2 / 23	1286		
2 / 24	1282	X	X
3A / 1	1255	X	X
3A / 2	1581		
3A / 3	1259		
3A / 4	1260	X	X
3A / 5	1264	X	X

TABLE E-1 WATER USE OF MILAN WATER IN BROADVIEW ACRES AND ADJACENT LOTS

SUBDIVISION BLOCK / LOT	CUSTOMER NUMBER SITE ID	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2019 WATER USAGE	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2020 WATER USAGE
3A / 6	1266		
3A / 7	1268		
3A / 8	1269		
3A / 9	1270	X	X
4A / 1	1708	X	X
4A / 2	1252	X	X
	1705	X	X

EAST OF BROADVIEW ACRES			
	1322		
	1656	X	X
	1720	X	X

TABLE E-2 WATER USE OF MILAN WATER IN FELICE ACRES AND ADJACENT LOTS

SUBDIVISION BLOCK / LOT	CUSTOMER NUMBER SITE ID	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2019 WATER USAGE	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2020 WATER USAGE
1	1242		
1	1243		
1	1244		
2	1245		
2	1246		
3	1247		
4	1248		
5	1249		
6	1240		
6	1241		
7	1231	X	X
7	1232		
7	1233		
7	1234		
7	1235	X	X
7	1236	X	
7	1237		
7	1238	X	X
7	1239	X	X
7	1540		
8	1275	X	X
8	1276		
8	1277		
9			
10			
11			
12			
13			
14			
15	1274	X	X
16	1273	X	X
17	1271	X	X
17	1272	X	X
18	1472	X	X
19	1605		

TABLE E-2 WATER USE OF MILAN WATER IN FELICE ACRES AND ADJACENT LOTS

SUBDIVISION BLOCK / LOT	CUSTOMER NUMBER SITE ID	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2019 WATER USAGE	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2020 WATER USAGE
PROPERTY WEST OF FELICE ACRES			
	1519	X	X
	1278	X	X
	1279		
	1280	X	X
	1464		
	1487	X	X
	1281	X	X
	1482		
	1568	X	X
PROPERTY SOUTH OF FELICE ACRES			
	1583	X	X
PROPERTY EAST OF FELICE ACRES			
	1468	X	X
	1709		
	1718	X	X
	1719	X	X

TABLE E-3 WATER USE OF MILAN WATER IN MURRAY ACRES

SUBDIVISION BLOCK / LOT	CUSTOMER NUMBER SITE ID	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2019 WATER USAGE	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2020 WATER USAGE
1 / 1	1364		
1 / 1	1365		
1 / 2	1366	X	X
1 / 2	1367	X	X
1 / 3	1368	X	X
1 / 4	1369		
1 / 5	1371		
1 / 6	1372	X	X
2 / 1	1362	X	X
2 / 1	1363	X	X
2 / 2	1359		
2 / 3	1357	X	X
2 / 4	1355		
2 / 4	1370	X	X
2 / 5	1354	X	X
2 / 6	1351	X	X
3 / 1	1361		
3 / 2	1360		
3 / 3	1358	X	X
3 / 4	1356	X	X
3 / 5	1353		
3 / 6	1352	X	X
4 / 1	1341		
4 / 1	1342		
4 / 2	1343	X	X
4 / 3	1344	X	X
4 / 3	1345		
4 / 3	1346	X	
4 / 4	1701	X	X
4 / 5	1349		
4 / 5	1350	X	X
5 / 1	1347		
	1348	X	X

TABLE E-4 WATER USE OF MILAN WATER IN PLEASANT VALLEY ESTATES AND ADJACENT LOTS

SUBDIVISION BLOCK / LOT	CUSTOMER NUMBER SITE ID	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2019 WATER USAGE	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2020 WATER USAGE
1 / 1	1424	X	X
1 / 2	1375		
1 / 2	1376		
1 / 2	1377		
1 / 2	1382	X	X
1 / 2	1394	X	X
1/3	1385	X	X
1 / 3	1386	X	X
1 / 3	1387		
1 / 3	1388	X	X
1 / 7	1390	X	X
1 / 8	1389		
1 / 8	1391	X	X
2 / 4	1398		
2 / 5	1399		
2 / A1	1397	X	X
2 / A2	1392	X	X
2 / A2	1393	X	X
2 / A2	1396		
2 / A2	1400		
2 / A2	1401		
	1373	X	X
	1378	X	X
	1379	X	X
	1380		
	1381		
	1383	X	X
	1384		
	1395	X	X
	1403		
	1536	X	X
	1537	X	X
	1680	X	X
PROPERTY SOUTH OF PLEASANT VALLEY ESTATES			
17 - 2	1587	X	X
11 - 2	1613	X	X

**TABLE E-5 WATER USE IN VALLE VERDE AND
ADJACENT LOTS**

SUBDIVISION BLOCK / LOT	CUSTOMER NUMBER SITE ID	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2019 WATER USAGE	PRIVATE RESIDENTIAL WELL WATER 2019	VILLAGE OF MILAN WATER SUPPLY SYSTEM 2020 WATER USAGE	PRIVATE RESIDENTIAL WELL WATER 2020
1 / 8	1696	X		X	
1 / 9	1700	X		X	
1 / 10	1617	X		X	
1 / 12	1475	X		X	
1 / 13	1479	X		X	
2 / 1	1474	X		X	
2/5	1702	X		X	
2 / 6	1713	X		X	
2 / 7	1473	X		X	
2 / 9					
2/10	1618	X		X	
3 / 1	1516	X		X	
3 / 2	1593	X		X	
3 / 3	1710	X		X	
3 / 4	1612	X		X	
4/11	1706	X		X	
4 / 8	1592	X		X	
4 / 14	1728		X	X	
4 / 18	1556	X		X	
5 / 12	1714	X		X	
7 / 13	1506	X		X	
7 / 16	1722	X		X	
7 / 15	1723	X		X	

PROPERTY NORTH OF VALLE VERDE					
	1513	X		X	
	1514	X		X	

PROPERTY EAST OF VALLE VERDE					
1/21	1712	X		X	
2 / 1	1711	X		X	
2 / 5	1493	X		X	
2 / 7	1502	X		X	
2 / 3	1566	X		X	

PROPERTY SOUTH OF VALLE VERDE					
	1557	X		X	