January 13, 2026

Eric Burch
Closure Manager
Homestake Mining Company of California
Grants, New Mexico 87020
eburch@barrick.com

Re: Request for Additional Information on the Discharge Permit Renewal, DP-200, Homestake Mining Company, Grants Reclamation Project

Dear Eric Burch,

The Mining Environmental Compliance Section (MECS) of the New Mexico Environment Department (NMED) received a Groundwater Discharge Permit Renewal Application from Homestake Mining Company (HMC) for the Grants Reclamation Project (GRP) for Discharge Permit 200 (DP-200). DP-200 (approved in 2014) was set to expire on September 25, 2019, and a timely renewal application was received on May 23, 2019.

NMED determined on June 20, 2019, that the application was administratively complete. NMED received completed proof of public notice for the Discharge Permit Application on December 3, 2019.

In accordance with Section 20.6.2.3106.G NMAC, DP-200 was administratively continued and remains an active permit. The administrative continuation allows the facility to continue operating under the terms and conditions of the 2014 Discharge Permit until NMED finishes a review of the new application.

This Request for Additional Information (RFAI) is to address deficiencies in the 2019 DP-200 application. Please submit comments to this RFAI within 60 days of receipt of this letter.

General Comments

1. Part I. Administrative Completeness, 2. Please update the facility operator contact and consultant information.
2. Part I Administrative Completeness, 3. Please provide updated maps for property ownership.
3. Part I. Administrative Completeness, 4. The Pre-Discharge Total Dissolved Solids (TDS) Concentration in Ground Water in the 2019 Discharge Permit Application is listed as 2,734 mg/L for the San Mateo alluvial aquifer. The Nuclear Regulatory Commission (NRC) groundwater protection standard (GWPS) for TDS in the San Mateo alluvial aquifer was approved in 2006 at 2,734 mg/L. In 2023, the Environmental Protection Agency (EPA) and NMED distributed a Groundwater Background Reassessment Technical Memorandum where background TDS in the San Mateo Alluvial aquifer was determined to be 1,350 mg/L. Please update and justify the Pre-Discharge Total Dissolved Solids (TDS) Concentration in Ground Water for the San Mateo and Rio San Jose alluvial aquifers, as well as the Upper, Middle, and Lower Chinle aquifers.

4. Part I, Administrative Completeness, 5. Please provide an updated table showing the location of all treatment facilities and ponds onsite (e.g., EP-3, etc.). Please also provide the maximum pond volumes and a description of the leak detection systems and their operation.
5. Part I, Administrative Completeness, 6. Several remedial technologies have been discontinued since the approval of the existing Discharge Permit DP-200 in 2014. The 2019 DP-200 application lists the onsite zeolite treatment system as a remedial technology to treat groundwater at the site. Please confirm which remedial technologies are currently in use or remain under consideration for future use. For any remedial technology that may have been discontinued since the approval of the existing DP-200 in 2014 (e.g., Large Tailings Pile flushing, onsite zeolite treatment system, etc.), please provide the year operations ceased and details on any remaining closure activities (i.e., well plugging and abandonment, facility deconstruction, etc.) that may still need to be completed.
6. Part II. Technical Completeness, 1b1. Determination of Maximum Daily Discharge Volume -
    a. The Proposed Maximum Daily Discharge Volume listed in the 2019 Discharge Permit Application is listed as 7,920,000 gallons per day (gpd). Discussions between NMED and Homestake Mining Company (HMC) have indicated that drain down from the Large Tailings Pile (LTP) may be slowing. Additionally, since the 2019 application Groundwater injection from the San Andres-Glorietta (SAG) aquifer into the Chinle aquifer at the site has ceased. Please update and provide justification of the Proposed Maximum Daily Discharge Volume to reflect current site conditions.
    b. The 2019 Discharge Permit Application mentions “At maximum rate, the RO plant has an inflow of 1,200 gpm with an expected annual average treatment rate of up to 1,050 gpm with approximately 790 gpm going to RO product for injection into groundwater.” In recent years the average treatment rate has been well below these listed treatment rates. Please update and justify the treatment rates to reflect current site conditions by providing the monthly rate for the past year and the projected rate for the future.
7. Part II Technical Completeness, 1b2. Please provide an up-to-date facility stormwater management plan for the site. A stormwater management plan was not included in the 2019 application and is now a requirement of NMED Discharge Permit applications.
8. Part II Technical Completeness, 2a. Please provide updated maps, to replace and update those initially included in the 2019 discharge permit renewal application.
9. Part II Technical Completeness, 3. Please provide an updated flow metering system table.
10. Part II Technical Completeness, 4. Please verify that the water quality of the treated water presented in Tables 4.3-1 and 4.3-2 of the Semi-Annual Environmental Monitoring Reports is the same as what is injected into onsite and offsite areas at the site.
11. Part II Technical Completeness, 5. In the 2014 Discharge Permit DP-200, NMED defers to the Groundwater Monitoring Plan as provided in Appendix A of the Groundwater Corrective Action Program to the NRC for groundwater monitoring well sampling requirements. Tables 2-1 and 2-2 in the plan outline the groundwater monitoring wells to be sampled, water quality sampling frequency, and parameters monitored. HMC writes in Part III of the 2019 Discharge Permit Application “No revisions to DP-200 renewal with possible exception of monitoring adjustments to be determined in communication with NMED-GWQB permit staff.” Since the 2019 DP application, NMED has identified deficiencies in this monitoring program and has raised these concerns with both the NRC and EPA. NMED requests that the following monitoring wells be added to Table 2-1 Groundwater Monitoring to address monitoring program deficiencies.

a. Alluvial groundwater monitoring wells: B9, B10, DV, S3, SA, SB, SUR, SV, 553, 554, 650, 657, 684, 685, 687, 896, 935, and 994.
b. Upper Chinle groundwater monitoring wells: B16 and CW73.
c. Middle Chinle groundwater monitoring wells: CW74.
d. Lower Chinle groundwater monitoring wells: CW36.
e. SAG groundwater monitoring wells: SAG1 and SAG2.
f. Please provide a map plotting the locations of the monitoring wells identified in the updated Table 2-1.

12. Part II Technical Completeness, 5c. Please provide a list of all wells that have been plugged and abandoned at the site from the issuance of Discharge Permit DP-200 in 2014 through the date of this letter.
13. Part II Technical Completeness 5e. NMED received and reviewed the ET Cover Design Report Rev. 1, updated June 3, 2025. This new evapotranspiration (ET) cover design for the LTP was approved by the NRC on December 12, 2025, by issuing Amendment No. 65 to Source Materials License SUA-1471. A summary of the cover design exactly as approved by the NRC should be included in the Engineering and Surveying - Proposed New Structures or Improvements to Existing Structures section of the Discharge Permit Application. Please reference the exact approved ET Cover Design with an attachment, along with a summary for the Discharge Permit Application record.
14. Part II Technical Completeness, 5f. Please update the Land Application Area Information if applicable.
15. Part III Additional Proposals and Conditions. Please provide an updated underground injection control (UIC) listing of wells as required by Discharge Plan Condition 48 (DP-200 amendment 14-01 dated December 30, 2014). The recent Quarterly UIC Reports list wells that do not match what is shown in the Annual Monitoring Reports / Performance Reviews. For example, the 3rd Quarter 2024 UIC Report dated October 31, 2024, lists wells that do not match what is shown in Figures 4.1-1, 4.1-1A, 4.1-1B, and 4.1-1C in the 2024 Annual Monitoring Report / Performance Review. Specifically, well 496 is listed as active but not listed as an injection well in Figure 4.1-1B. Well 655 is listed as active but not listed as an injection well in Figure 4.1-1C. Infiltration line RCR7 is listed as active but not listed as an active infiltration line in Figure 4.1-1B. Please provide a map identifying the UIC-listed wells, along with an operational plan describing the planned use of each UIC well.
16. Part III Additional Proposals and Conditions – Closure. Please provide updated NRC-held financial assurance documentation.
17. Part III Additional Proposals and Conditions – Closure. Please provide description(s) of all measures approved and proposed in support of (eventual) facility closure and post-closure reclamation, monitoring and maintenance, assuming that an EPA Record of Decision is issued and/or the NRC accepts Groundwater Alternate Concentration Limits prior to expiration of the forthcoming updated DP-200.
18. Part III Additional Proposals and Conditions. Please provide a waste minimization plan to implement, as practicable, best management practices for minimization and recycling of process water and waste generated from use of the groundwater collection systems and RO water treatment plant operation to reduce the potential for impacts to ground water. A waste minimization plan was not included in the 2019 application and is now a requirement of NMED Discharge Permit applications if applicable.

Please contact Corey Dimond of MECS at (505) 795-4216 or corey.dimond@env.nm.gov or mecs.general@env.nm.gov with any questions.

Sincerely,

Joseph Fox

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Joseph Fox, Program Manager
Mining Environmental Compliance Section
Ground Water Quality Bureau
New Mexico Environment Department

JF:cd

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MECS Reading File