



Homestake Mining Company of California

P.O. Box 98
Grants, NM 87020

Tel +1 505 287 4456

Fax +1 505 287 4457

July 10, 2026

Joseph Fox
Program Manager
Mining Environmental Compliance Section
Ground Water Quality Bureau – NMED

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

Dear Mr. Fox,

Homestake Mining Company (“HMC”) submits this response (“Response”) to the New Mexico Environment Department (“NMED”) Mining Environmental Compliance Section’s (“MECS”) January 13, 2026, Request for Additional Information (“RFAI”) related to the May 20, 2019, renewal application for Discharge Permit 200 (“DP-200”) for the Grants Reclamation Project (“Grants Site”). On February 20, 2026, HMC requested an extension until July 10, 2026, to respond to the RFAI, a request that NMED approved. HMC appreciates the extension of time that NMED provided to respond to the RFAI.

As discussed during the February 19, 2026, meeting in Santa Fe, the Nuclear Regulatory Commission (“NRC”), the Environmental Protection Agency (“EPA”), and NMED share overlapping jurisdiction over remedial actions at the Grants Site. It is our goal to work with all three agencies in a coordinated fashion to avoid duplicative and/or contradictory regulatory outcomes. As outlined during the February meeting, under the NRC Alternate Concentration Limit (“ACL”) process, the Grants Site will meet human health groundwater standards in 20.6.2.3103 NMAC for site derived contaminants of concern and will *not* result in concentrations in excess of such standards at any place of withdrawal for the present or reasonably foreseeable future use. Additionally, the Grants Site will also meet the federal Safe Drinking Water Maximum Contaminant Levels (“MCL”) for site derived contaminants of concern at the point of exposure, *i.e. immediately* outside the long-term care boundary (“LTCB”).

Because of the complex nature of the Grants Site, we sincerely appreciate NMED’s agreement that DP-200 will remain administratively continued until the completion of both the NRC and EPA processes. As discussed above, upon an NRC decision to approve the ACL Application License Amendment, NMED’s human health groundwater standards in 20.6.2.3103 will be met at the point(s) of withdrawal for the present or a reasonably foreseeable future use, which is at the boundary line of the LTCB. As a result, going forward DP-200 may be unnecessary. But, in the event that a permit is still necessary, administratively continuing the existing permit until completion of the EPA and the NRC processes avoids duplication of effort and public confusion.

In the attached, HMC listed and restated each of NMED's eighteen (18) requests in full as they appeared in the RFAI letter, with HMC's response immediately following each item. HMC has also included with its responses any relevant Attachment to the respective request.

If you have any questions, please contact me via e-mail at dlattin@barrick.com or via phone at 775-397-7215.

Respectfully,

A handwritten signature in blue ink, appearing to read 'DL', with a stylized flourish extending to the left.

Daniel Lattin, P.E.
Sr. Program Manager
On behalf of Eric Burch
Closure Manager
Homestake Mining Company of California

Cc:

Andrew Knight
Jonas Armstrong
Amber Rheubottom
Corey Dimond
Melanie Wong
Sai Appaji
Adam Arguello
Josiah Gerber
Eric Burch
Elizabeth Rudolf
Michael McCarthy
Allison Brown
Kevin Murray
Cristina Mulcahy

1. Part I. Administrative Completeness, 2. Please update the facility operator contact and consultant information.

HMC Response:

The HMC facility operator and consultant contact information has been updated to reflect the name and contact information for Eric Burch (Mr. Burch), HMC Closure Manager, at the Grants Site. Any specific questions regarding contact information for a given outside HMC consultant, if any, can be obtained through and by contacting Mr. Burch, as follows:

Eric Burch,
Closure Manager
eburch@barrick.com
(775) 934-1766

2. Part I Administrative Completeness, 3. Please provide updated maps for property ownership.

HMC Response:

Please find attached to this Response **Attachment A** which is a Land Ownership Status map depicting the real property that HMC owns as of July 10, 2026.

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.

HMC Response:

HMC has previously analyzed and discussed the 2023 EPA and NMED Groundwater Background Reassessment Technical Memorandum in its November 14, 2023, response letter to EPA. The response letter is included again with this Response as **Attachment B**. HMC's position remains unchanged from that which it provided to EPA in the November 14, 2023, response letter. As enumerated in greater detail in the letter, HMC has demonstrated that the 2006 Groundwater Protection Standards previously approved by EPA, NMED, and the NRC are appropriate for Grants Site.

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.

HMC Response:

Request No. 4 requests that HMC make certain revisions to the table in Part I.5 of the Application, namely, to show the location of all treatment facilities and ponds. It also seeks information on the maximum pond volumes and a description of the leak detection systems and their operation.

The Table in Part I.5 of the Discharge Permit Application seeks a description of “the location for the entire facility by listing the Township, Range, and Section, and/or latitude and longitude for the locations of all components of the processing, treatment, storage, and/or disposal system.” Please find attached to this Response, **Attachment C**, which includes an updated Table I.5 Facility Location and Table I.5A Pond Information. Although the Permit Application and the regulations in 20.6.2 NMAC do not require maximum pond volumes, Attachment C Table I.5A Pond Information identifies (i) maximum volume, (ii) the year constructed, (iii) liner type, and (iv) the surface area.

Also included with this Response is **Attachment D** Figure 3.1-2, which is a map depicting the location(s) of all treatment facilities and ponds on the Grants Site. The locations of Grants Site ponds and the Reverse Osmosis (R.O.) treatment facility are shown in Figure 3.1-2. Evaporation Pond No. 1 (EP1) has not been in service since 2024. Evaporation Pond No. 2 (EP2) has a maximum volume of 320.2 ac-ft and is in active use. Evaporation Pond No. 3 (EP3) has a maximum volume of 265.7 ac-ft and is in active use. EP3 has two cells (EP3A and EP3B). The West Collection Pond (WCP) has a maximum volume of 12 ac-ft and is in active use. The East Collection Pond (ECP) has not been in service since 2020.

Finally, a description of the leak detection systems and their operation are not required by the Application nor the regulations in 20.6.2 NMAC. But HMC voluntarily provides the following information in response to Request No. 4: The active ponds (EP2, EP3, and WCP) are dual HDPE lined facilities with Leak Detection Systems (LDS). Each LDS consists of a 6-inch or greater HDPE pipe placed between the primary and secondary liners from the top of the sloped embankment to a collection sump located at the inner toe of the embankment. The collection sumps consist of an enlarged area at the bottom of the embankment. The LDS pipe is backfilled with clean, coarse sand to allow accumulation and pumping of water that has passed through the primary liner and captured by the secondary liner. A submersible pump is positioned at the bottom of each LDS pipe, which is turned on and off automatically by water level sensors placed on the pumps when specified water levels are reached within the sump. Water is pumped from the sump back into the pond and a totalizing flow meter is used to track quantities of water pumped from each leak detection sump.

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 Grants 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.

HMC Response:

Request No. 5 requests confirmation of which remedial technologies are currently in use or remain under consideration for future use, and for any “remedial technologies” that have been discontinued: (i) the year the use stopped and (ii) details on any remaining closure activities (“well plugging and abandonment, facility deconstruction, etc.”) that may still need to be completed for the cessation of the “remedial technolog[y].”

The Application indicates that groundwater is treated at an on-site R.O. water treatment plant or an on-site zeolite treatment system. The on-site zeolite treatment system ceased operating in 2022. The zeolite treatment facilities have been removed and staged for final disposal on-site. Wells that were used to supply water to these facilities are still in use as a part of the ongoing R.O. treatment process and will be plugged and abandoned per all applicable New Mexico Office of the State Engineer regulations in 19.27.1 NMAC *et seq.* during final closure activities for the Grants Site or will be retained as monitoring wells, as appropriate and as determined part in parcel of the closure activities.

As of July 10, 2026, the following remedial technologies remain in place: groundwater treatment through the collection of impacted groundwater, treatment by R.O., and optional re-injection of fresh and treated water into the impacted aquifer.

As of July 10, 2026, HMC has not identified any additional or new “remedial technologies,” which were not previously identified in the Application that remain under consideration for future use.

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.

HMC Response to 6.a.:

Request No. 6.a asks that HMC “update and provide justification of the Proposed Maximum Daily Discharge Volume,” which presently authorizes a discharge for 7,920,000 gpd (5,500 gpm). This Discharge Volume remains appropriate for the Grants Site and should not be updated or revised. The drain down from the Large Tailings Pile (LTP) only composes a small volume of the total permitted 5,500 gpm discharge and HMC does not anticipate the reduction in drain down from the LTP to meaningfully reduce the total discharge volume at the Grants Site.

Moreover, HMC must maintain operational flexibility, including discharge volumes, in order to complete its remediation processes and comply with all current and future remediation requirements from both the NRC and the EPA. HMC may conduct additional reviews of the discharge volume as remediation continues and given that certain remedial technologies, such as the on-site zeolite treatment system, have ceased to determine if this discharge volume may be reduced in the future.

- 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.

HMC Response to 6.b.:

Request No. 6.b asks that HMC (1) update and/or justify the treatment rate of 1,050 gpm; (2) provide the monthly treatment rate for the past year (2024-2025 provided to NMED, given that 2026 has not yet completed); and (3) provide the projected treatment rate for the future. For clarification, NMED stated “treatment rates,” but there is only one treatment rate of 1,050 gpm listed in Request No. 6.b.

The R.O. treatment system has a theoretical design capacity to treat water at a rate of 1,200 gallons per minute (gpm). While system improvements have increased the theoretical design capacity flowrates up to 1,200 gpm, these “nameplate” rates were never expected to be sustainable as long-term treatment rates. The theoretical design capacity is the maximum output of a system operated continuously during a given period under optimal conditions. Theoretical design capacity does not account for down time from planned or unplanned maintenance, component underperformance/failure, and other site-specific factors (e.g., evaporation pond capacity, weather-related downtime). Based upon years of operational data, HMC estimates that the actual maximum operational capacity of the R.O. system is approximately 720 gpm. The

average monthly treatment rate in 2025 was 517 gpm. It is anticipated that the RO plant treatment rate will vary between 470 and 720 gpm for the foreseeable future.

7. Part II Technical Completeness, 1b2. Please provide an up-to-date facility water 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.

HMC Response:

This Request asks HMC to create a stormwater management plan for the Grants Site and provide it to the NMED. This Request suggests that stormwater management plans are now required for Groundwater Discharge Permit Applications under 20.6.2 NMAC. However, nothing in the current Groundwater Discharge Permit Application or 20.6.2.3106 NMAC indicates that a stormwater management plan is required. Rather, Part II.1.b.2 of the current Groundwater Discharge Permit Application mirrors the same Part in the 2019 application—both Permit Applications request that the applicant “[i]dentify other wastewater or stormwater discharges at the facility not described in this application and indicate what other permits apply to them.”

Requirements for a stormwater management plan only appear in the Groundwater Protection – Supplemental Permitting Requirements for Copper Mine Facilities 20.6.7 NMAC. But the Grants Site is not now, nor has it historically been a copper mine and DP-200 is not permitted pursuant to 20.6.7 NMAC. HMC is willing to discuss potentially preparing a stormwater plan but has not included any such plan with this Response because HMC was unable to find any applicable regulatory or other reference to such requirement.

8. Part II Technical Completeness, 2a. Please provide updated maps, to replace and update those initially included in the 2019 discharge permit renewal application.

HMC Response:

Request No. 8 appears to be duplicative of at least Request Nos. 2 and 4. Please find attached to this Response the following maps that are responsive to Request No. 8 (and other Requests):

- The map requested in response to Request No. 2, included as **Attachment A**, which depicts land ownership as of July 10, 2026;
- The map requested in response to Request No. 4, included as **Attachment D** Figure 3.1-2, which depicts all treatment facilities and roads at the Grants Site; and

- **Attachment E** contains Figures 1, 1A, 1B and 1C which are an update to Figure 1 in the 2019 Application and show the current location of collection and injection wells at the Grants Site.

These maps include all of the required information that is applicable to the Grants Site.

9. Part II Technical Completeness, 3. Please provide an updated flow metering system table.

HMC Response:

Please find included with this Response, the document labelled **Attachment F** which contains 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 Grants Site.

HMC Response:

Table 4.3-1 of the Semi-Annual Environmental Monitoring Report presents the water quality of all (both the onsite and offsite area) injection water.

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.

HMC Response:

Request No. 11 asks HMC to add the wells enumerated in Request Nos. 11.a-11.f to the *Groundwater Monitoring Plan* Table 2-1 in Appendix A of the NRC *Groundwater Corrective Action Program*. In this Request, NMED states that is “has raised these concerns with both the NRC and EPA” regarding the alleged “deficiencies in the monitoring program.” *See* Request No. 11. But NMED has not, to date, identified with *any specificity* the alleged monitoring program deficiencies to HMC. HMC is willing to discuss and address any concerns and correct any perceived monitoring deficiencies, to the extent that they exist; however, because NMED has not identified the alleged deficiencies with any specificity, HMC declines at the present time to add the requested wells to *Groundwater Monitoring Plan* Table 2-1. Likewise, absent more specific information regarding the alleged monitoring deficiencies, the regulatory requirement for further and different monitoring is unclear. Moreover, the well distribution mapping and attendant data that HMC has developed over the last 50 years demonstrates that the current monitoring program outlined in Table 2-1 is more than adequate.

HMC remains committed to the remediation and closure of the Grants Site and is willing to work in collaboration with the NMED to understand any concerns related to monitoring deficiencies and, where appropriate, make further adjustments to the Grants Site monitoring program in conjunction with the ongoing NRC and EPA processes.

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.

HMC Response:

This Request seeks a list of all wells that HMC has plugged and abandoned at the Grants Site from September 18, 2014, (last renewal of DP-200) to January 13, 2026. HMC has been actively plugging and abandoning wells at the Grants Site as they are removed from the remediation program. HMC plugs and abandons these wells in accordance with New Mexico Office of the State Engineer regulations in 19.27.1 NMAC et seq.

Please find included with this Response, **Attachment G**. This Attachment is a list of all permitted abandoned wells from September 18, 2014, through January 13, 2026. Additionally, 678 non-permitted wells located in the Large Tailings Pile were also abandoned during this time period. This information is reported in the Semi-Annual Environmental Monitoring Reports Section 3 Operations, Subsection 3.4 Well Drilling and Closures and Table 3.4.1 Wells Drilled and Abandoned.

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.

HMC Response:

In response to Request No. 13, NMED seeks the following information from HMC: (1) a reference to the ET Cover Design Report that served as the basis for the NRC Amendment No. 65 and (2) a summary of the cover design as approved by the NRC in or about December 2025.

The ET Cover Design Report is available in the NRC's ADAMS document database under accession number ML25163A319 accessible via the following link:

<https://www.nrc.gov/docs/ML2516/ML25163A319.pdf><https://www.nrc.gov/docs/ML2516/ML25163A319.pdf>

The December 15, 2025, NRC approved ET Cover Design Report is summarized as follows:

- Project Goal: To design an updated ET cover for the top surface of the LTP that provides long-term erosional stability while limiting radon emissions and net infiltration to protect groundwater and human health.
- Design Profile Updates: The proposed 8.5-foot-thick ET cover replaces the 1995 Rock-Armor cover design (4.34-foot-thick) that was approved by the NRC in 1995. It consists of:
 - Erosion Protection Layer (1.0 foot): A surficial layer composed of 60% soil and 40% gravel to control erosion while supporting vegetation growth.
 - Upper Radon Barrier (3.0 feet): Loosely compacted (88–92%) soil to facilitate plant growth, store water, and provide frost protection.
 - Lower Radon Barrier (4.5 feet): Densely compacted (95% or greater) soil optimized to minimize radon emanation.
 - Existing Interim Cover (1.0 foot): Regraded and recompacted in place.
- Runoff & Erosion Management: The top surface will be crowned to distribute runoff uniformly away from the eastern side slopes. A 10-foot-long rock apron perimeter will transition surface flow to the side slopes, preventing concentrated runoff from forming rills and gullies.
- Material Characterization: The design report synthesizes geotechnical, hydraulic, agronomic, and analytical testing (such as Radium-226 concentrations) from historical investigations and recent field campaigns (2019, 2021, 2022) across two local borrow sources (the North and West Borrow Areas).

14. Part II Technical Completeness, 5f. Please update the Land Application Area Information if applicable.

HMC Response:

Request No. 14 is not applicable to the Grants Site because no land application occurs at the Grants Site and HMC is not proposing to apply reclaimed or treated wastewater to a land application area.

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.

HMC Response:

Request No. 15 seeks the following three categories of information from HMC: (1) an updated list of all UIC wells, with each well identified as active, inactive, or as a potential UIC well; (2) a map that identifies the UIC-listed wells, as updated; and (3) an operational plan for each of the UIC wells on the updated list.

Part III does not expressly require information related to UIC wells. However, please find included herein **Attachment E**. This Attachment lists the UIC wells and depicts the location of all UIC-listed wells.

Attachment E presents the location of wells for the Grants Site with green labels indicating potentially active injection wells or recharge lines. The injection capacity of the injection sites shown as potentially active exceeds the supply of R.O. product water, and only a portion of the injection sites will be used at any given time. A priority for operation has been assigned to groups of wells and recharge lines to distribute the injection water to areas where it will contribute to hydraulic containment and/or general groundwater restoration. The priority system has been developed by general area (On-Site, South Off-Site and North Off-Site) and by location within that area. Because there are a large number of injection wells and recharge lines available, a specific operational plan is not presented for each well or recharge line, and some of the available wells or recharge lines shown on the associated map figures may not be used. There may also be infrastructure and distribution system constraints that affect utilization of some injection sites, so the priority system is used to manage the injection program. Given these

circumstances, some of the criteria used in the assignment of priority are outlined below. But plans depend on operational needs, including maintaining flexibility to achieve remediation goals.

The highest priority is assigned to the On-Site area where the injection water is distributed to create a hydraulic barrier on the south and western sides of the LTP. The majority of the available R.O. product water will be injected into selected wells in the On-Site area and in wells in the area of the L-series wells.

- The highest priority injection wells are located just to the south and/or west of the collection area at the toe of the LTP.
- Recharge lines south and west of the LTP are a lower priority than injection wells and will be utilized if there is injection water available after distribution to the higher priority wells.
- When there are injection wells located between a particular injection well and the LTP or Small Tailings Pile (“STP”), the more distant wells are assigned a lower priority than a closer well.

A limited number of injection wells are planned to be operated in the South Off-Site area to continue groundwater corrective action in the alluvium and/or underlying Chinle aquifers.

A limited number of injection wells are planned to be operated in the North Off-Site area to continue groundwater restoration in the alluvium. Because the groundwater in much of the area has been restored to below or near the uranium standard, the injection rate for the area will be a relatively small part of the available R.O. Product water.

- Up to two injection wells are planned to be operated at one time.
- The location of selected operating wells is planned to be shifted from west to east as restoration progresses.

16. Part III Additional Proposals and Conditions – Closure. Please provide updated NRC-held financial assurance documentation.

HMC Response:

Please find included herein **Attachment H**, which contains the most recent NRC financial surety documents. The financial surety is also available on NRC’s ADAMS site accession number ML26084A378 accessible via the following link:

<https://www.nrc.gov/docs/ML2608/ML26084A378.pdf>

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.

HMC Response:

Request No. 17 seeks a description of all measures that (1) have been approved or (2) are proposed in support of eventual (a) facility closure and (b) post-closure reclamation, monitoring and maintenance in the event that EPA issues its Record of Decision and/or the NRC accepts the *Groundwater Alternate Concentration Limits*.

Part III does not expressly require information related to measures approved and proposed in support of closure, reclamation, monitoring, and maintenance. However, HMC notes that it previously provided some of the information sought in Request No. 17 to NMED through the 1993 Decommissioning and Reclamation Plan (“DRP”). The DRP contains the approved measures to support eventual closure, reclamation, monitoring, and maintenance. Additional and updated insight on the information sought in Request No. 17, including the proposed measures to support closure, reclamation, monitoring, and maintenance, can be found in HMC’s 2026 *Alternate Concentration Limits* Application (“2026 ACL Application”) submitted to the NRC in June 2026.

A complete and expansive documentation and assessment of all measures approved and proposed can be found in the DRP and the 2026 ACL Application. The DRP Volumes 1 and 2 are available in the NRC’s ADAMS document database under accession numbers ML091490367 and ML091490469 accessible via the following links:

<https://www.nrc.gov/docs/ML0914/ML091490367.pdf>
<https://www.nrc.gov/docs/ML0914/ML091490469.pdf>

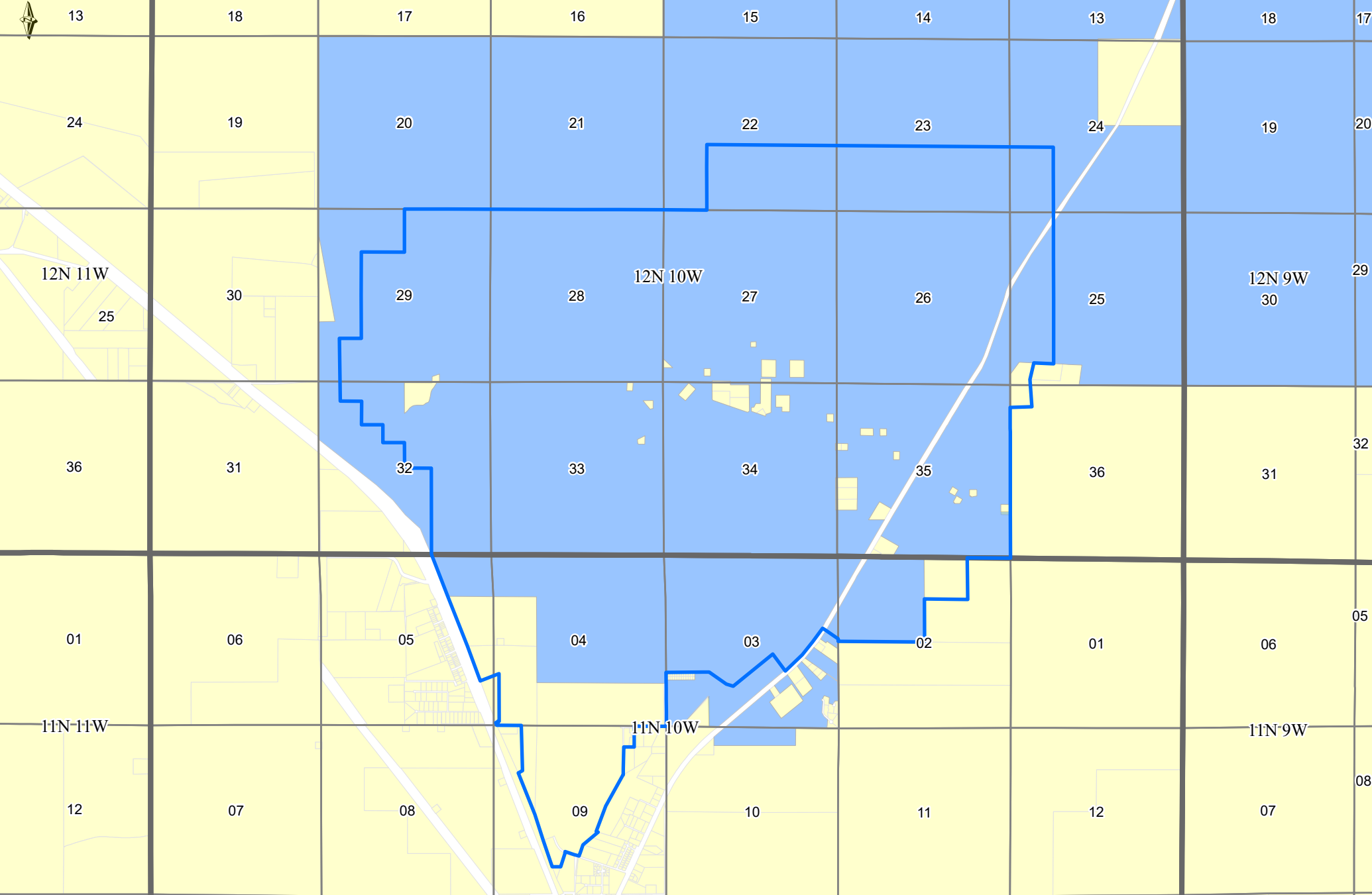
The 2026 ACL Application Revision 1 was transmitted by email to Corey Dimond at NMED on June 30th, 2026.

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.

HMC Response:

A waste minimization plan is not required by Part III or any other part of the Groundwater Discharge Permit Application, nor is it required by 20.6.2 NMAC. Requirements for waste minimization plans only appear in the Groundwater Protection – Supplemental Permitting Requirements for Copper Mine Facilities, 20.6.7.11 NMAC. But the Grants Site is not now, nor has it historically been a copper mine and DP-200 is not permitted pursuant to 20.6.7 NMAC. HMC is willing to discuss potentially providing such plan to NMED; however, has not included any such plan with this Response because HMC was unable to find any applicable regulatory or other reference to such requirement.

Attachment A - Land Ownership Status Map

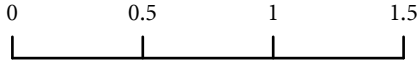


HOMESTAKE

Provisional Map – This map was not prepared from a field survey and should not be relied on as a representation of legal land descriptions. Information on this map may not be complete or up to date and its accuracy is not to be relied upon. This map is intended only as a general representation of land status and is for Barrick's use only.

- ACL LTCB
- Township
- Section
- Third Party Parcels
- Homestake Parcels

Land Ownership Status



Miles

Attachment B - HMC Response to EPA & NMED Background Reassessment



Homestake Mining Company of California

P.O. Box 98
Grants, NM 87020

Tel +1 505 287 4456
Fax +1 505 287 9289

By Email

November 14, 2023

Mr. Sai Appaji
Superfund Division (6SF)
U.S. Environmental Protection Agency - Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202
Email: (appaji.sairam@epa.gov)

**Re: Homestake Mining Company Superfund Site
Response to the EPA & NMED report titled:
"Groundwater Background Reassessment Technical Memorandum for the Homestake
Mining Company Superfund Site Grants, Cibola County, New Mexico"**

Sai:

Homestake Mining Company of California (HMC) hereby submits a written response to the EPA & NMED report titled "Groundwater Background Reassessment Technical Memorandum for the Homestake Mining Company Superfund Site Grants, Cibola County, New Mexico" (the "Background Memorandum"). The objective of the reassessment was to determine natural background groundwater quality for the alluvial and bedrock aquifers present at the site. The EPA Background Memorandum presents calculations of natural background conditions which exclude what EPA identifies as potential anthropogenic conditions unrelated to the Homestake Mining Company Superfund Site (the Site). The technical memorandum states "[t]he use of natural background is consistent with CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and EPA policy and guidance. It is also consistent with the New Mexico Water Quality Act, Water Quality Control Commission regulations, and NMED's groundwater discharge permitting program for groundwater abatement." Furthermore, the Background Memorandum indicates the natural background values calculated will be used to support the development of preliminary remediation goals (cleanup levels).

Homestake maintains that the 2006 Groundwater Protection Standards previously approved by EPA, NMED, and NRC are appropriate for the site.¹ EPA and NMED's new proposed background standards disregards what EPA determines to be anthropogenic background, which EPA then fails to recognize in setting the proposed new standards. If EPA is correct that anthropogenic conditions exist at the site, then EPA should not exclude anthropogenic impacts in EPA's calculated background standards because it is inconsistent with EPA policy and guidance, as discussed in detail below.

Homestake respectfully disagrees with EPA's approach of excluding what it identifies as anthropogenic background in its calculations. EPA should include anthropogenic concentrations as well as natural concentrations in its development of preliminary remediation goals, consistent with EPA policy and guidance and NMED regulations.

¹ EPA, NMED, and NRC agreed to site standards for each constituent of concern in 2006 based on evaluation of background water quality directly beneath and downgradient of the large tailings pile. In 2015, under EPA oversight, Homestake hired Arcadis to reassess the studies to determine if the background standards for the project are appropriate under CERCLA. The report was finalized in August of 2019. *Grants Reclamation Project, 2019 Supplemental Background Soil and Groundwater Investigation (Aug. 29, 2019)*.

First, as EPA mentions but fails to fully address in the Background Memorandum, EPA policy and guidance state that EPA rarely sets cleanup levels below natural or anthropogenic background if the concentration is unrelated to the site.² The reasons for this approach include cost-effectiveness, technical practicability, and the potential for recontamination of remediated areas by surrounding areas with elevated background concentrations. The one exception allowing EPA to require cleanup to levels below natural or anthropogenic background concentrations is pursuant to CERCLA Section 104(a)(4), which applies only during a public health or environmental emergency declaration and is not applicable here.³

Moreover, when non-site related contamination is upgradient from a remediated site, the remediated area can be recontaminated over time to the upgradient background contaminant concentrations.⁴ As explicitly stated in EPA guidance, in such a situation, the background concentration would be the “recontamination” value.⁵ If a site may be recontaminated from upgradient material burying or mixing with clean material and converging with reclaimed material over time, EPA should consider the site’s background values including upgradient anthropogenic and natural contamination.⁶

Here, EPA concludes in the Background Memorandum that background contaminant values include contamination caused by legacy uranium mining and milling operations in the upgradient San Mateo Creek Basin at large. EPA and NMED concluded that upgradient contamination is leaching onto the Site, and producing a secondary source of groundwater contaminants including, but not limited to, uranium, selenium, and sulfate. If true, any proposed standard must reflect this conclusion.

Second, EPA states that excluding anthropogenic background is consistent with NMED regulations. That is inaccurate. EPA’s Background Memorandum Para. 1.3, EPA cites to New Mexico’s Water Quality Control Administrative Code, Section 20.6.2, which defines “background” as an amount of contamination “naturally occurring . . . **or from a source other than the responsible person’s facility.**”

In its Background Memorandum, EPA dismisses HMC’s background evaluation because it considered “non-steady state conditions,” or in other words, anthropogenic background. As stated several times throughout EPA guidance and policy statements, anthropogenic background should be considered when evaluating background and cleanup levels. As such, EPA is directly contradicting its decades of precedent, policy, and guidance by ignoring anthropogenic background at the Site. By dismissing anthropogenic background, EPA would fail to determine appropriate cleanup requirements at the Site.

Additionally, as detailed in the attached technical review, Homestake presents the following technical concerns:

1. There are inconsistencies and discrepancies in the geochemical modelling used to support the conceptual model regarding anthropogenic influences to groundwater from historic upgradient mine water discharge.

² EPA 2018 Frequently Asked Questions About the Development and Use of Background Concentrations at Superfund Sites: Part One, General Concepts. OLEM Directive 9200.2-141 A (EPA 2018); EPA 2002 Role of Background in the CERCLA Cleanup Program. OSWER 9285.6-07P; EPA 1997 Rules of Thumb for Superfund Remedy Selection. Office of Emergency and Remedial Response. OSWER 9355.0-69; See EPA 1997 Establishment of Cleanup Levels for CERCLA Sites with Radioactive Contamination. OSWER 9200.4-18.

³ CERCLA Section 104(a)(4).

⁴ EPA 2018.

⁵ *Id.*

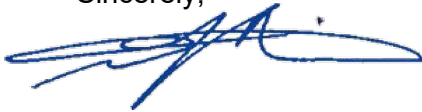
⁶ *Id.*

2. Discussions regarding groundwater from SMC-08/916 being representative of background conditions have been inconsistent and remain unsupported by the data.
3. Statements regarding the behaviour of uranium in groundwater and the source of selenium are speculative and not supported by geochemical modelling or site-specific testing.
4. The process of data elimination to produce the final data set for statistical background analysis is not clearly articulated and subjective.
5. Assigning three separate sets of Chinle mixing zone background values is an over-interpretation of the conceptual model and contributes to the limited data set.
6. The identification and removal of outliers and the use of the Bayesian Hierarchical Analysis for determination of groundwater background do not appear to follow EPA Unified Guidance⁷.
7. The Bayesian Hierarchical Analysis model does not meet the published guidelines with respect to model documentation, transparency, and reproducibility, nor have the necessary model sensitivity analyses and convergence assessments been described.

HMC requests that EPA correct the inconsistencies listed above and discussed in detail in the attached technical review.

Please contact me by phone (775) 397-7215 or by email dlattin@barrick.com if you have any questions.

Sincerely,



Daniel Lattin, P.E.
Sr. Closure Program Manager
Homestake Mining Company of California

Cc:

Adam Arguello, P.E.
Brad Bingham
Michael McCarthy
Allison Brown
Elizabeth Rudolf
Kevin Murray
Anne Mauer
Mark Purcell
Samuel Cheek

file

⁷ EPA 2009. Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance 530/R09-007, March.

November 14, 2023

Review of the EPA/NMED Groundwater Background Reassessment Technical Memorandum for the Homestake Mining Company Superfund Site, Grants, Cibola County, New Mexico

Homestake Mining Company of California (HMC) presents their review and comment of “*Groundwater Background Reassessment Technical Memorandum for the Homestake Mining Company Superfund Site: Grants, Cibola County, New Mexico*” (the Report) dated May 30, 2023 and prepared by the U.S. Environmental Protection Agency (Region 6) and New Mexico Environment Department (the Agencies). The purpose of the groundwater background reassessment was to determine natural background conditions at the Site based on the Agencies reaction to “...*strong opposition by residents, as members of the Murray Acres Community Association, and the grassroots organizations Blue Water Valley Downstream Alliance and the Multicultural Alliance for a Safe Environment to the Homestake background levels and current groundwater cleanup levels.*” The Groundwater Protection Standards previously approved by EPA, NMED, and NRC are appropriate for the site, but as a result of the Agencies’ background reassessment, the majority of the revised background values are now significantly lower (up to more than an order of magnitude) compared to background values previously approved by EPA, NRC, and NMED. Applying the Report, the natural background groundwater quality results will subsequently be inappropriately used by the Agencies to support decision-making on groundwater cleanup due to the exclusion of what EPA has determined are anthropogenic background levels.

Although the Agencies recognize that HMC’s original statistical calculations are acceptable, the Report indicates that differences between their revised background values and HMC’s background values result from use of different groundwater data sets in the calculations. Based on the Agencies’ determination that transient, non-steady state groundwater conditions represent anthropogenic background—which the Agencies’ declined to consider—all data construed as such were considered unsuitable and rejected from the final data set. The Agencies’ updated background values for selenium, chloride, nitrate-N, and sulfate are now below the MCLs, and the revised background values for uranium and TDS are also significantly lower than the prior agency approved background values. The background values previously approved by all agencies for molybdenum, vanadium, radium-226+228, and thorium-230 were below MCLs and State of New Mexico groundwater standards, and subsequently no effort was expended by either Agency to generate revised and internally consistent background values for these remaining constituents.

Overall, the Report provides a description of the rationale and objectives, historical development of background values, the Agencies’ interpretation of anthropogenic effects to groundwater, site overview, and the methodology used to calculate background concentrations. One important distinction that has not been made is whether the background concentrations, and their respective groundwater standards presented in Sections 5.0 and 6.0, are based on total (unfiltered) or dissolved (filtered) concentrations. HMC has also documented a number of inconsistencies and concerns regarding the Agencies’ approach, assumptions, and methodology as described in the Report:

- 1) There are inconsistencies and discrepancies in the geochemical modeling used to support the Agencies’ conceptual model regarding anthropogenic influences to groundwater from historic upgradient mine water discharge.**

Results presented in the report *“Geochemical Conceptual Site Model and Batch-Equilibrium Modeling of Groundwater at Monitoring Well DD, Homestake National Priorities List, New Mexico”* (May 14, 2021) are used to support the Agencies’ conceptual model regarding influences of historic upgradient mine water discharge on groundwater quality. In the discussion regarding PHREEQC modeling (Page 10), it is stated that: *“Results (of the modeling) provided the basis to quantitatively evaluate complex geochemical processes occurring as voluminous mine-water discharge recharged and mixed with natural alluvial groundwater north of the Site. The NMED and EPA received comments from Homestake on the modeling report in October 2020,”* (HMC, 2020) *“and an updated report was released by NMED in May 2021. The updated report addressed the technical comments provided by Homestake.”* However, comparison of the NMED (2020) and NMED (2021) documents revealed NMED did not address a number of HMC’s technical comments as claimed, and that some remaining discrepancies still exist:

- The Well DD modeling remains inconsistent with the conceptual model. The batch modeling is circular and uses the water composition from Well DD, with additional geochemical reactions, to generate a predicted water quality at Well DD.
- Although modeling results indicate that calcium is more strongly adsorbed to the HFO surface compared to uranium, the actual *“displacement”* of uranium was never simulated.
- While the Well DD simulation specified the contents of calcite and gypsum based on actual measurements, mixing simulations used a default excess concentration for both minerals. Rather than modifying the mixing calculations to incorporate actual measurements, the Well DD file was modified to contain an arbitrary excess of calcite and gypsum.
- A disconnect remained in the input file, where ferrihydrite (HFO) was assumed to be present in excess and then additional ferrihydrite precipitation occurs. The HFO content was not linked to the SURFACE data block where an arbitrary amount of HFO was used.
- Chemical kinetics was widely ignored in all modeling calculations, including inverse modeling, whereas NMED also disregarded model results demonstrating that native uranophane dissolution could produce the chemistry at Well DD in the absence of mine water impacts.
- The validity of actual batch tests using site-specific materials is discounted, while the batch modeling that was conducted by NMED is stated to be *“an appropriate initial approach to evaluate mineral equilibrium and adsorption processes occurring at Well DD in the absence of key kinetic parameters required for reactive transport modeling for the alluvial aquifer”*.
- While the key kinetic parameters are actually included with the PHREEQC documentation, the more sensible approach to modeling groundwater evolution over time using reactive transport modeling with chemical kinetics was disregarded by NMED.

2) Discussions regarding groundwater from SMC-08/916 being representative of background conditions have been inconsistent and remain as being not supported by the data.

HMC previously noted inconsistencies in the NMED (2020) modeling report, where it was stated (Page 18): *“It is likely that alluvial groundwater at this location is not impacted by historical mine-water discharges and this well represents native (non-mining influenced) groundwater in this area of the alluvium”*, but then refers to *“...background well SMC-08/916.”* (Page 20). In response to HMC’s comments

(HMC, 2020) on the NMED (2020) report, the revised NMED (2021) report no longer referred to SMC-08/916 as a “background well”. However, Page 22 of the current Report specifically states that “...*alluvial well SMC-08/916...represents natural groundwater not impacted by mine-water discharges.*”

Further, the Agencies’ conceptual model and background reassessment continues to overlook the fact that well SMC-08/916 appears to be completed in the Chinle Formation and is not an “alluvial well”, based on geologic descriptions as previously discussed by HMC (2020). The Agencies have further disregarded the fact that the sodium-bicarbonate signature of groundwater at SMC-08/916 may reflect that the well is screened in the Chinle Formation, rather than representing alluvial groundwater not affected by mine-water discharge.

3) Statements regarding the behavior of uranium in groundwater and the source of selenium are entirely speculative and not supported by geochemical modeling or site-specific testing.

The discussion of transient geochemical conditions in the alluvial aquifer system (Section 4.3.7) is speculative when stating how the increasing trend “*suggests that an advancing uranium plume migrated...*” and how the decreasing trend “*suggests that the centroid of the uranium plume has migrated past these wells...*”. Interpretation of these trends could have been enhanced by geochemical modeling, however the modeling approach used is not adequate to describe transport of an advancing plume. The Report explicitly states that results of batch-reaction modeling provided the basis to quantitatively evaluate complex geochemical processes occurring as voluminous mine water discharge recharged and mixed with the alluvial aquifer (Page 10). Use of a static batch-equilibrium model is entirely inconsistent with the conceptual model and cannot be used to quantify the geochemical processes occurring in a dynamic transient system. Reactive transport modeling would be the appropriate approach to use when assessing the migration of uranium in a groundwater system.

Discussion regarding the increasing selenium trends on Page 28 is also speculative, as the Agencies indicate the described trends are “*suggesting that this solute is being leached from the vadose zone...*”. The Report also states “[t]he source of selenium is natural, which desorbs from sediments in the vadose zone under rising water-table conditions.” First, the Report provides no conceptual geochemical discussion as to why the composition of the infiltrating water would cause selenium to desorb, as opposed to remaining adsorbed. Results from a reactive transport model could hypothetically be used to support this statement, although Site-specific measurements of the adsorbed selenium would be required as input, and in any case were not completed. Instead, column leaching studies should have been required to demonstrate the potential for vadose-zone leaching of selenium to produce the observed trends and concentrations. There are also no data (e.g., isotopic analyses) to support whether the source of selenium is natural or anthropogenic.

4) The process of data elimination to produce the final data set for statistical background analysis is subjective and not clearly articulated.

The Agencies assert that “transient” and “non-steady state” conditions in the alluvial aquifer are an indication of anthropogenic influence. Therefore, data representing non-steady state conditions were eliminated from the data set, and only the data representing “steady-state” conditions were retained in the final background data set. The Report states that non-steady state conditions were identified based

on “...significant chemical and hydrologic transients...”, although the definition of significant is not provided. Any level of “significance” used in data evaluations must have a statistical basis from which it is defined. The Report does not describe any statistical approach or criteria otherwise used to identify “transients”, therefore the process of data elimination was subjective and precludes the ability of these efforts to be duplicated by any other entity. Furthermore, no statistical basis was provided for identification and elimination of “outliers” as discussed in Section 7.0 of the Report.

The influence of upgradient mine-water discharges on transient conditions in the alluvial aquifer is described in detail. However, the Report does not articulate the basis for elimination of a substantial number of Chinle Formation values, other than deferring to the presence of transient conditions, and no discussion is provided regarding the significance of transient conditions in the Chinle Formation

HMC has also noted several inconsistencies in statements regarding wells and analytes used in the background reassessment. For example, Section 5.0 states that monitoring wells which were used in the HMC background statistical evaluations are the same wells used in the Agencies’ background assessment; however, alluvial wells 916 and 922 used by the Agencies (Table 5-1) were never used in HMC’s evaluation. In addition, Page 24 states that concentrations of selenium (and other constituents) at well DD are not representative of natural groundwater background in the alluvium, although selenium data from well DD were ultimately included in the background data set (Table 7-1).

5) Assigning three separate sets of Chinle mixing zone background values is an over-interpretation of the conceptual model and contributes to the extremely-limited data set.

The Agencies’ background reassessment expanded upon standards previously approved by all agencies and established for the Chinle mixing zone background values by calculating a separate set of mixing zone background values for the Upper, Middle, and Lower Chinle aquifers. The stated rationale is that three Chinle aquifers are separate groundwater aquifers with no known hydraulic connection to each other. HMC considers this approach unnecessary because the three Chinle aquifers receive groundwater recharge from the same overlying San Mateo alluvial aquifer and the boundary of the mixing zone was identified using common methodology, primarily the change in cation concentrations, and specifically the change from a calcium dominated water in the alluvium to a sodium dominated water in the Chinle formation (HMC, 2004). The three-mixing zone value approach results in an extremely limited data set from which it becomes impossible to calculate background statistical values for all six constituents in all Chinle aquifer mixing and non-mixing zones.

6) The identification and removal of outliers from the dataset and the use of the Bayesian Hierarchical Analysis for determination of groundwater background do not appear to follow EPA Unified Guidance (EPA, 2009).

Section 7.2 of the report identified that a number of anomalous outliers were removed from the dataset but provided no basis for their exclusion. EPA Unified Guidance indicates that removal of statistically identified outliers need to be based on technical information that can support the decision, and depending upon the distribution of the dataset, an outlier based on boxplots, for example, could be part of a non-parametric distribution (EPA, 2009). In addition, the Bayesian Hierarchical Analysis to develop simulated values is not a statistical methodology that is included in the EPA Unified Guidance for establishing background for groundwater (EPA, 2009).

7) Use of the Bayesian Hierarchical Analysis does not follow standard published guidelines concerning model transparency for verification and reproducibility, nor has any assessment of model sensitivity and parameter convergence been presented and discussed.

Statistical analyses are often elaborate and procedurally complex, and thus may be prone to erroneous or incomplete analyses, whose reporting is often opaque and not reproducible. Bayesian analyses tend to be especially susceptible to these problems due to their relative novelty among applied researchers. As a result, a number of statistical experts have produced published guidelines regarding the execution and reporting of Bayesian Analyses. Common themes among the published guidelines relate to transparency for model verification and reproducibility, in addition to evaluation of model sensitivity to priors and convergence. However, the Agencies have not presented the Bayesian Analyses results in a transparent manner, nor have they presented model sensitivity results or assessments of parameter convergence.

- **Model Transparency** – A crucial element in the review and assessment of any statistical analysis includes the sharing of data and scripts. Verification and reproducibility require access to both the electronic data set and the code used in the Bayesian model. To enable reproducibility, and to allow others to run Bayesian statistics on the same data with different parameters, priors, models, or likelihood functions for sensitivity analyses, the underlying data and code used should be properly documented and shared following the FAIR Principles: findability, accessibility, interoperability, and reusability (Wilkinson et al., 2016). More recently, van de Schoot et al. (2021) published a 10-point checklist for Bayesian model transparency of which the Agencies did not consider, and as a consequence, the Bayesian model as presented does not meet published accepted guidelines for model transparency.
- **Model Sensitivity and Convergence** – A primary critique of Bayesian Analysis is the influence of prior specification which might be chosen because of opportune reasons, which could lead to adjusting results to one's hypotheses by assuming priors consistent with these hypotheses (van de Schoot et al., 2014). Given the subjectivity of the model, it is important to conduct a sensitivity analysis to fully understand the impact of subjective priors and to gain a clear understanding of the robustness of the results to different prior settings (van de Schoot, 2021). In addition to sensitivity analyses, each parameter should be assessed for convergence using multiple convergence diagnostics, and the marginal posterior distribution for each model parameter should be presented to demonstrate there are no irregularities that could have resulted from non-convergence (van de Schoot et al., 2021). According to the Bayesian Analysis Reporting Guidelines (BARG) published by Kruschke (2021), evidence of MCMC convergence should be presented for every parameter or derived value. The Agencies have not presented or discussed any detailed findings regarding sensitivity analyses or assessments of convergence.

Overall, the Agencies' conclusions in the Report are inconsistent with the Agencies' own guidance, data, and scientific modeling techniques. Specifically, there are inconsistencies with regard to upgradient mine water discharge, well SMC-08/916, the behavior of uranium in groundwater, the source of selenium, data elimination, Chinle mixing zone background values, the identification and removal of outliers and use of

the Bayesian Hierarchical Analysis. In addition to HMC's recommendation that EPA should include anthropogenic concentrations as well as natural concentrations in its development of preliminary remediation goals, EPA should also correct the inconsistencies that are discussed above.

REFERENCES

- Homestake Mining Company and Hydro-Engineering, LLC. 2004. Grants Reclamation Project Background Water Quality Evaluation of the Chinle Aquifers. June.
- Homestake Mining Company (HMC) 2020. Homestake Mining Company Superfund Site Technical Review of the NMED Report Titled: "Geochemical Conceptual Site Model and Batch Equilibrium Modeling of Alluvial Groundwater at Monitoring Well DD, Homestake National Priorities List Site". Letter By Email to Mark Purcell (USEPA Region 6) from Daniel Lattin, P.E., Homestake Mining Company. October 30th.
- New Mexico Environment Department (NMED). 2020. Geochemical Conceptual Site Model and Batch-Equilibrium Modeling of Groundwater at Monitoring Well DD, Homestake National Priorities List, New Mexico. September 11th)
- New Mexico Environment Department (NMED). 2021. Geochemical Conceptual Site Model and Batch-Equilibrium Modeling of Groundwater at Monitoring Well DD, Homestake National Priorities List, New Mexico. May 14th.
- United States Environmental Protection Agency, 2009. Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, EPA 530/R-0-007. March.
- Van de Schoot, R., D. Kaplan, J. Denissen, J.B. Asendorpf, F.J. Neyer, and M.A.G. van Aken. 2014. A gentle introduction to Bayesian Analysis: Applications to developmental research. *Developmental Method.* 85(3):842-860.
- Van de Schoot, R., S. Depaoli, R. King, B. Kramer, K. Märtens, M.G. Tadesse, M. Vannucci, A. Gelman, D. Veen, J. Willemsen, and C. Yau. 2021. Bayesian Statistics and Modelling. *Nature Review Methods Primer.* 1:1.
- Wilkinson, M.D., M. Dumontier, I.J. Aalbersberg, G. Appleton, M. Axton, A. Baak, N. Blomberg, J.W. Boiten, L.B. da Silva Santos, P.E. Bourne, J. Bouwman, A.J. Brookes, T. Clark, M. Crosas, I. Dillo, O. Dumon, S. Edmunds, C.T. Evelo, R. Finkers, A. Gonzalez-Beltran, A.J.G. Gray, P. Groth, C. Goble, J.S. Grethe, and B. Mons. 2016. The FAIR Guiding Principles for scientific data management and stewardship. *Scientific Data.* 3:160018.

Attachment C - Tables I.5 Facility Location & I.5A Pond Information

TABLE I.5 - FACILITY LOCATION					
Component ID	Township	Range	Section	Latitude	Longitude
Large Tailings Pile	12N	10W	26	35.243710	-107.863210
Small Tailings Pile	12N	10W	26	35.235640	-107.861070
Water Treatment Plant	12N	10W	26	35.239390	-107.869180
EP-1 ¹	12N	10W	26	35.237710	-107.860190
EP-2	12N	10W	26	35.238370	-107.864390
EP-3	12N	10W	22&23	35.254650	-107.871580
West Collection Pond	12N	10W	26	35.238667	-107.867965

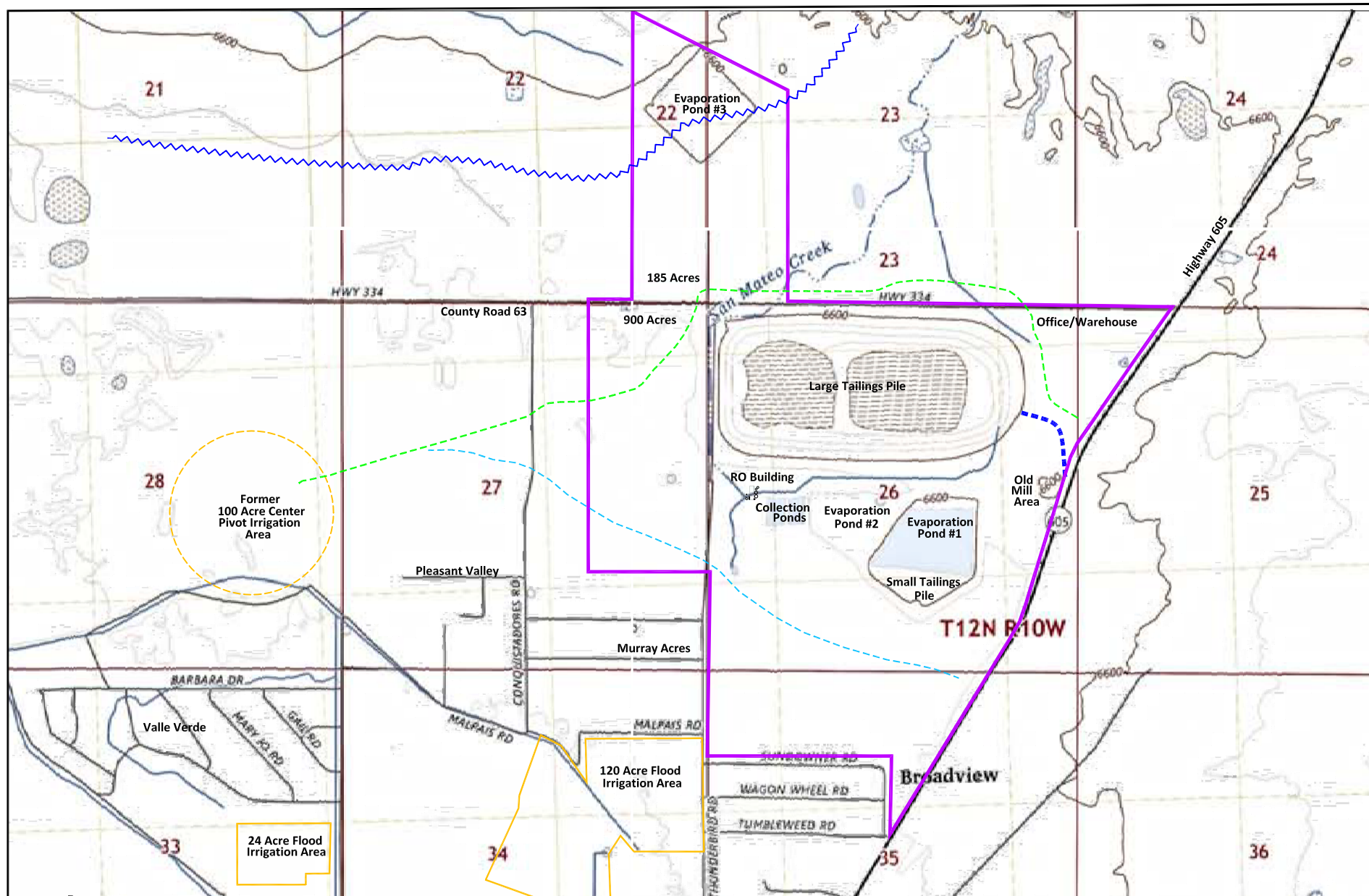
1. Out of Service

TABLE I.5A - POND INFORMATION				
Pond	Year Constructed	Liner type	Surface Area [acres]	Maximum volume [acre-feet]
West Collection Pond ¹	1986	Double synthetic (60 mil over 40 mil)	2.4	12
EP-1 ²	1990	Single synthetic (90 mil)	26.3	320.2
EP-2	1996	Double synthetic (60 mil over 40 mil)	17.5	265.7
EP-3	2010	Double synthetic (60 mil over 40 mil)	26.5	265.7

1. Relined in 2020

2. Out of Service

Attachment D - Figure 3.1-2 Site Topo and General Features



LEGEND:

- Diversion Levee
- ~~~~~ PMF Floodplain Boundary
- Runoff Diversion Channel
- Project Boundary
- Proposed Runoff Diversion Channel
- Contour - 20 Foot Interval
- Index Contour - 100 Foot Interval

Source:
USGS 1:24000 Quads -
Grants (2023), Bluewater (2023),
Milan (1978), and Dos Lomas (2023), New Mexico



0 500 1000 2000 Feet

HOMESTAKE MINING COMPANY GRANTS RECLAMATION PROJECT

FIGURE 3.1-2
SITE TOPOGRAPHY AND
GENERAL SURFACE FEATURES

Attachment E - Figures 1, 1a, 1b, 1C Well Locations

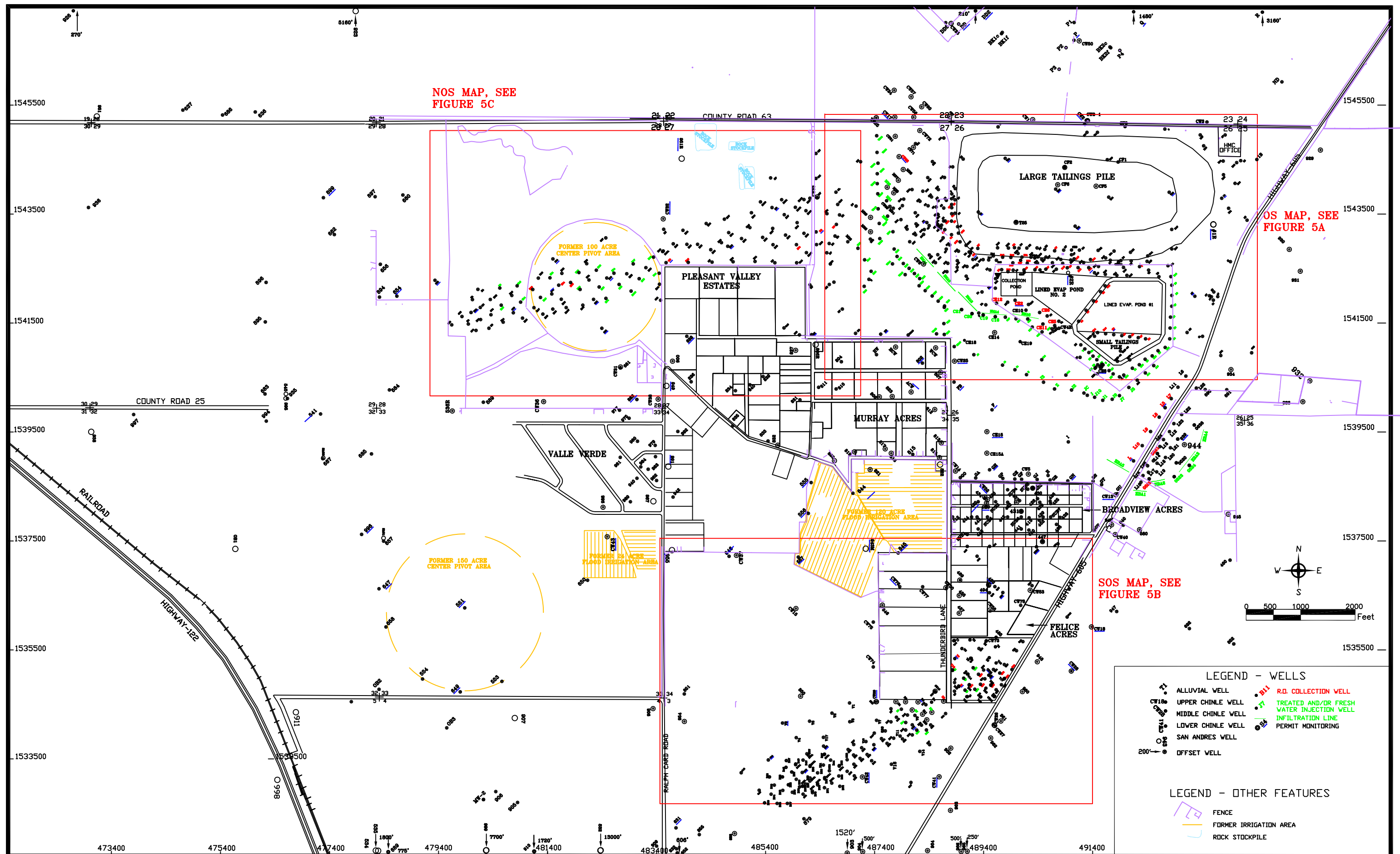


Figure 1. Location of Injection, Collection and Other Wells, 2026

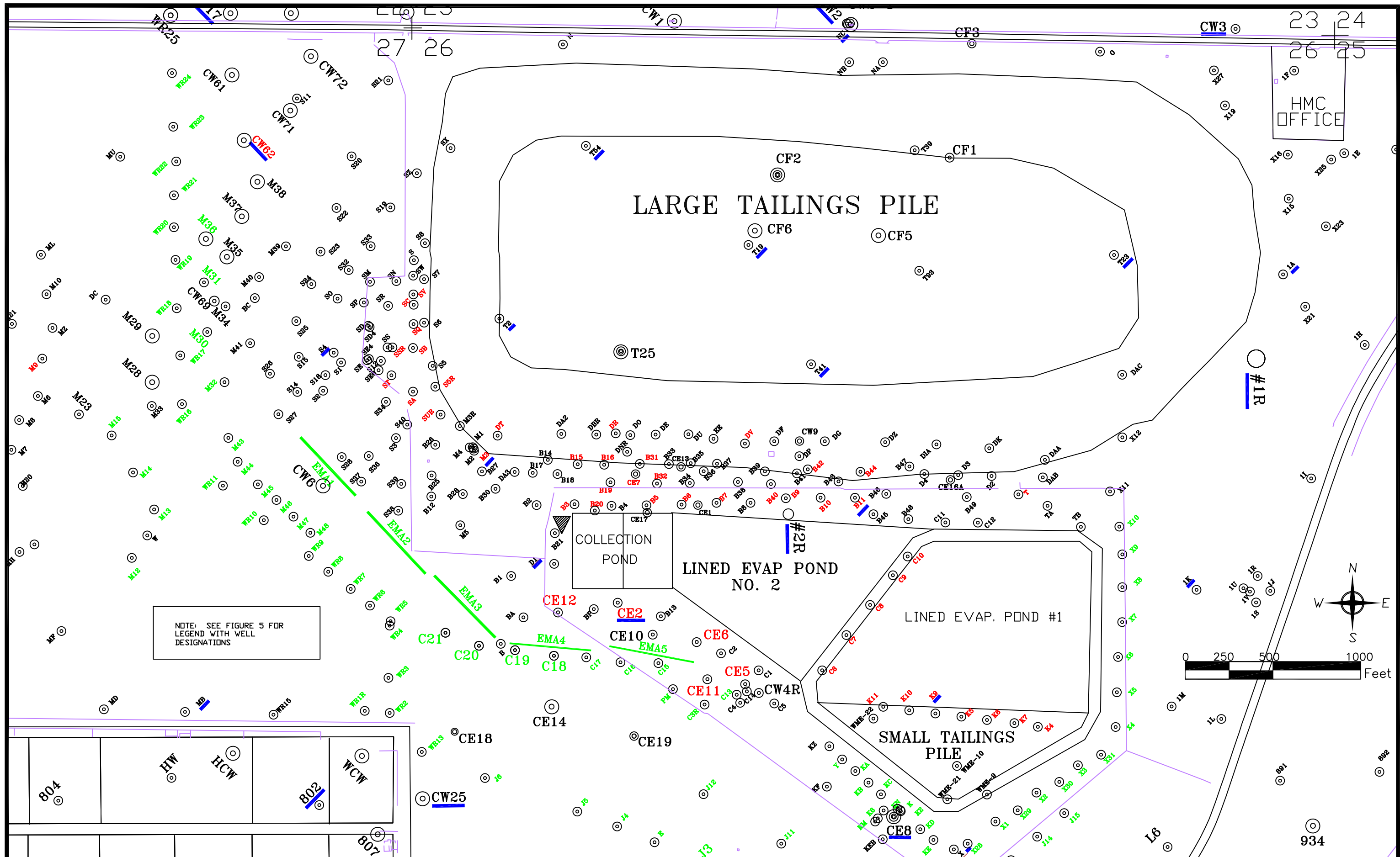
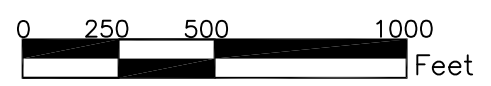
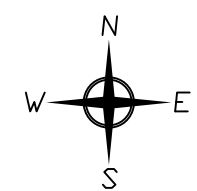
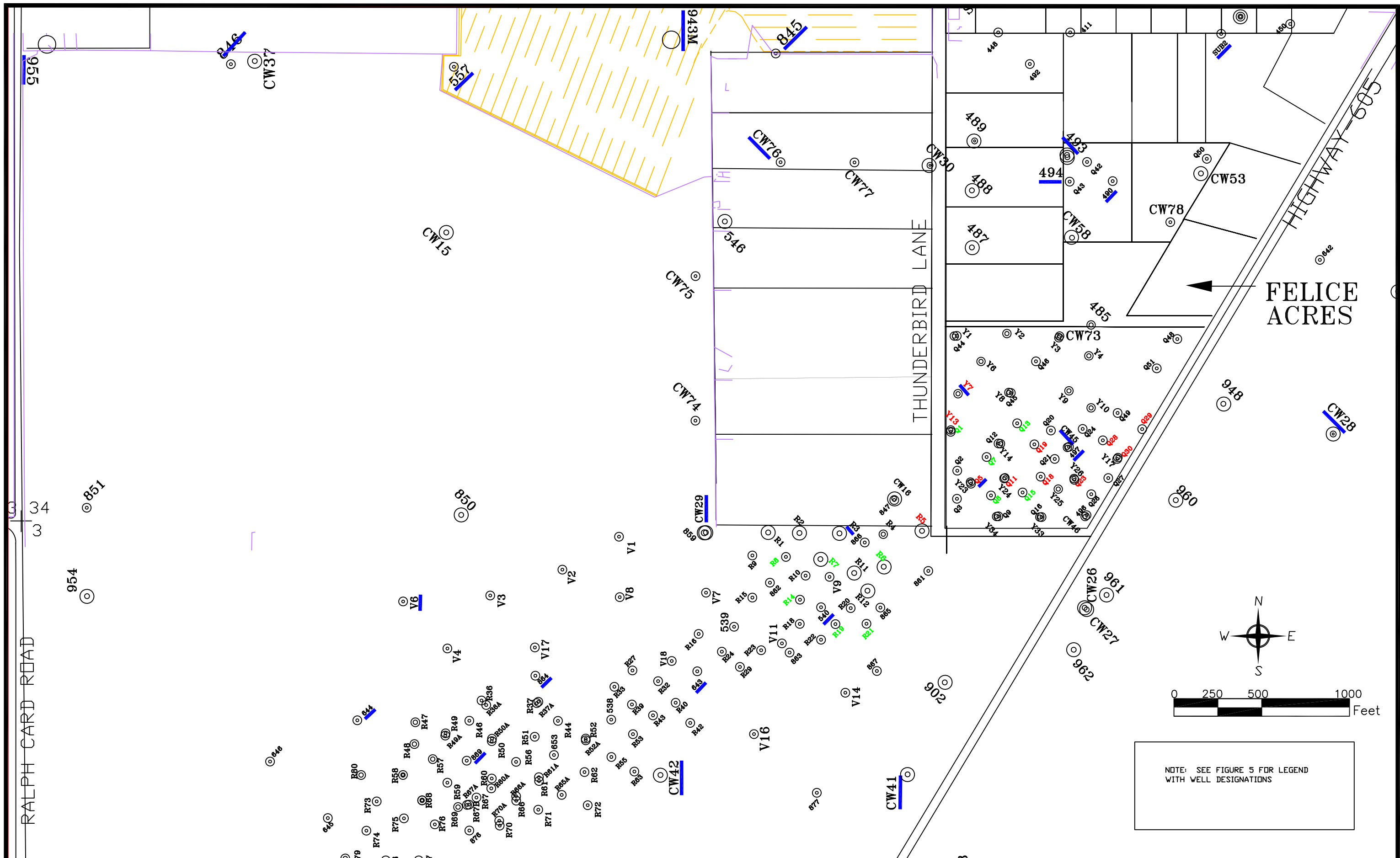


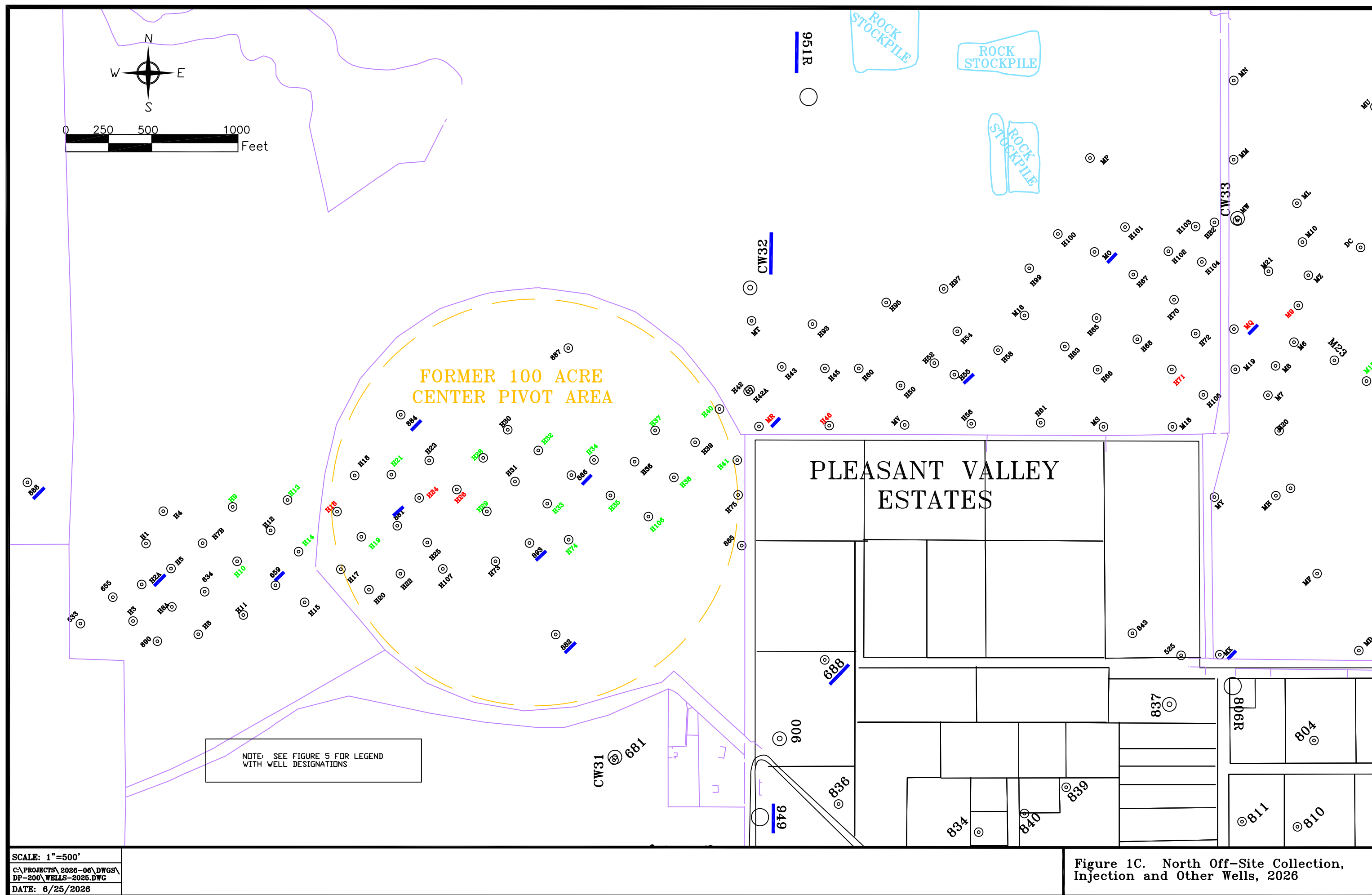
Figure 1A. On-Site Collection, Injection and Other Wells, 2026



NOTE: SEE FIGURE 5 FOR LEGEND
WITH WELL DESIGNATIONS

SCALE: 1"=500'
C:\PROJECTS\ 2026-06\DWGS\
DP-200\WELLS-2025.DWG
DATE: 6/25/2026

Figure 1B. South Off-Site Collection,
Injection and Other Wells, 2026



Attachment F - Flow Metering System Table

Flow Metering System Table

Meter ID	Proposed or Existing	Influent, Effluent, Injection	Location Description	Flow Type	Meter Type
Deep #1R	Existing	Influent	At Well	Pumped	Electromagnetic Meter
Deep #2R	Existing	Influent	At Well	Pumped	Mechanical Meter
Well 951R	Existing	Influent	At Well	Pumped	Mechanical Meter
#1 Alluvial Meter	Existing	Influent	Between EQ Basins at the RO Plant	Pumped	Electromagnetic Meter
#2 Alluvial Meter	Existing	Influent	Between EQ Basins at the RO Plant	Pumped	Electromagnetic Meter
#1 T Well Alluvial Meter	Existing	Influent	Between EQ Basins at the RO Plant	Pumped	Electromagnetic Meter
Combined Off-Site Collection Meter	Existing	Influent	Collection Manifold near RO Plant	Pumped	Electromagnetic Meter
RO LPRO #1 Product	Existing	Injection	RO Plant	Pumped	Electromagnetic Meter
RO LPRO #2 Product	Existing	Injection	RO Plant	Pumped	Electromagnetic Meter
RO LPRO #3 Product	Existing	Injection	RO Plant	Pumped	Electromagnetic Meter
North Off-Site Injection	Existing	Injection	Main Injection Header	Pumped	Mechanical Meter
South Off-Site Injection	Existing	Injection	Main Injection Header	Pumped	Mechanical Meter
Off-Site Injection	Existing	Injection	Injection Pump Header	Pumped	Electromagnetic Meter
On-Site Injection	Existing	Injection	Injection Pump Header	Pumped	Electromagnetic Meter
WCP to RO	Existing	Influent	Between EQ Basins at the RO Plant	Pumped	Electromagnetic Meter

Attachment G – Table G-1 Wells Plugged and Abandoned

Table G-1. Wells Plugged and Abandoned

Well Name	Well Name	Well Name	Well Name	Well Name	Well Name
410	1Q	H44	T10	T63	T111
421	1T	H47	T11	T64	WME-18
422	657A	H48	T12	T65	WME-19
423	801R	H49	T13	T66	WME-20
427	802A	H51	T14	T67	WN4
436	802B	H57	T15	T68	WR1
437	AW	H59	T16	T69	WR12
446	CF4	H62	T17	T70	WR14
449	CF5	H64	T18	T71	X13
481	CF6	H69	T20	T72	X14
482	CF7	M11	T21	T73	X17
483	CF7A	M17	T22	T74	X18
484	CW39	M22	T24	T75	X20
486	CW44	M22	T26	T76	X22
491	CW54	M24	T27	T77	X24
495	DA	MA	T28	T78	X26
498	DA4	MC	T29	T79	Y5
530	DB	ME	T30	T80	Y11
531	DH	MG	T31	T81	Y12
544	DI	MI	T32	T82	Y15
635	DJ	MJ	T33	T83	Y16
648	DL	MK	T34	T84	Y22
803	DM	NE5	T35	T85	Y30
805	DN	NW5	T36	T86	
806	DQ	Q4	T37	T87	
818	DS	Q14	T38	T88	
837	DW	Q22	T40	T89	
838	DX	Q25	T42	T90	
841	DY	Q47	T43	T91	
842	G	R13	T44	T92	
848	GB	R17	T45	T94	
868	GC	R28	T46	T95	
871	GD	R34	T47	T96	
928	GG	R35	T48	T97	
943	GI	R38	T49	T98	
976	GK	R41	T50	T99	
986	GL	R45	T51	T100	
990	GM	R54	T52	T101	
993	GQ	R64	T53	T102	
#1 Deepwell	GW1	R65	T55	T103	
#2 Deepwell	GW2	T1	T56	T104	
1C	GW3	T4	T57	T105	
1D	H2	T5	T58	T106	
1G	H6	T6	T59	T107	
1N	H7	T7	T60	T108	
1O	H7A	T8	T61	T109	
1P	H27	T9	T62	T110	

Attachment H - Financial Surety



Homestake Mining Company of California

P.O. Box 98

Grants, NM 87020

Tel +1 505 287 4456

Fax +1 505 287 4457

March 17, 2026

ATTN: Document Control Desk

Document Control

U.S. Nuclear Regulatory Commission,

Washington, DC 20555-0001

ATTN: Ms. Melanie Wong

Senior Project Manager

U.S. Nuclear Regulatory Commission

Decommissioning, Uranium Recovery & Waste Programs

Office of Nuclear Materials Safety and Safeguards

MS T-5A10, 11545 Rockville Pike

Rockville, MD 20852

**RE: 2026 Financial Surety, In Accordance with Nuclear Regulatory Commission
Docket No. 40-8903, License No. SUA 1471**

Ms. Wong:

Pursuant to US Nuclear Regulatory Commission (NRC) License SUA-1471, Docket 40-8903, License Condition 28, please find the enclosed financial surety package regarding the proposed 2026 closure for the Homestake Grants Reclamation Project. The Closure Cost Estimate included in the 2021 financial surety submittal dated March 30, 2021 (ML21090A167), remains valid and is less than the proposed 2026 financial surety amount. In 2026, site conditions are unchanged.

The enclosed package includes:

1. Parent Company Guarantee
2. Revised Standby Trust Agreement (NRC signature required)
3. An attestation from Bruce Luke, Senior Vice President and Deputy Chief Financial Officer of Barrick Gold Corporation ("Barrick"), the Parent Company of Homestake Mining Company of California
4. Supporting documentation from Price Waterhouse Coopers verifying the accuracy of Barrick's financial strength
5. Revised Form 313 (signed)

The proposed 2026 financial surety amount was calculated as shown below:

2025 Approved Financial Surety Amount	\$105,123,244
Inflation rate of 1.027 (CPI-based*)	\$2,838,328
Proposed 2026 Adjusted Financial Surety Amount	\$107,961,572

*= based upon the US Bureau of Labor Statistics West Region.

https://www.bls.gov/regions/west/news-release/consumerpriceindex_west.htm # Table A

Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at eburch@barrick.com or via phone at 775.934.1766.

Respectfully,



Eric Burch
Closure Manager
Homestake Mining Company, Grants, New Mexico
Office: 505.287.4456 x35 | Cell: 775.934.1766

cc: N. Olin, DOE, Grand Junction, Colorado
S. Appaji, Region VI EPA, Dallas, Texas
C. Dimond, NMED, Santa Fe, New Mexico
M. McCarthy, Barrick, Salt Lake City, Utah
D. Lattin, Barrick, Elko, Nevada

**BARRICK GOLD CORPORATION
GRANTS OPERATION
AMENDED AND RESTATED
PARENT COMPANY GUARANTY**

AMENDED AND RESTATED PARENT COMPANY GUARANTY made and effective as of **March 31, 2016** (the "**Effective Date**") by BARRICK GOLD CORPORATION, an Ontario corporation having its principal place of business at BCE Place, Canada Trust Tower, Suite 3700, 161 Bay Street, Toronto, Ontario, Canada M5J 2S1 ("**Guarantor**") on behalf of its subsidiary, HOMESTAKE MINING COMPANY OF CALIFORNIA, whose mailing address is P.O. Box 98, Grants, New Mexico 87020, and whose street address is State Road 605, Milan, NM 87021, to the UNITED STATES NUCLEAR REGULATORY COMMISSION, an agency of the United States Government ("**NRC**").

Recitals

This Amended and Restated Guaranty is made by Guarantor to NRC to comply with regulations issued by NRC pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, and the Uranium Milling Tailings Radiation Control Act of 1978.

NRC has promulgated regulations in Title 10, Chapter 1 of the Code of Federal Regulations, Part 40, Appendix A, Criteria 9 and 10 requiring that a licensee of a uranium recovery facility provide assurance that funds will be available when needed in accordance with the approved Reclamation and Decommissioning Plan and also for any long-term surveillance and control of the uranium recovery facility.

Homestake Mining Company of California ("**Licensee**") is a wholly-owned subsidiary of Guarantor and holds the license SUA 1471 ("**License**") for the Milan Mill uranium recovery facilities ("**Facilities**").

Guarantor entered into a Parent Company Guaranty for the Facilities, on behalf of Licensee, effective March 31, 2003. Guarantor and Licensee desire to amend and restate the Parent Company Guaranty, dated March 31, 2003 and to have this Amended and Restated Parent Company Guaranty supersede and replace the Parent Company Guaranty, dated March 31, 2003.

Representations and Warranties

THEREFORE, Guarantor hereby agrees, represents, and warrants to NRC and its successors and assigns knowing that they will rely and continue to rely thereon:

1. Guarantor has full authority and capacity to enter into this Guaranty under its bylaws, articles of incorporation, and the laws of Ontario. Guarantor has been authorized by the Executive Committee of its Board of Directors to enter into this Guaranty.
2. Based on its audited balance sheet, Guarantor meets or exceeds the following financial criteria:

- (i) Guarantor's tangible net worth and net working capital are each equal to or greater than six times the sum of the current cost estimates for decommissioning, decontamination, reclamation, stabilization, and long-term surveillance and control required by the License; and
 - (ii) Guarantor's assets located in the United States amount to at least 90 percent of its total assets or at least six times the amount of the current NRC-approved cost estimates for decommissioning, reclamation, and any long-term surveillance and control required by the License; and
 - (iii) Guarantor meets two of the following ratios: a ratio of total liabilities to net worth less than 2.0; a ratio of the sum of net income plus depreciation, depletion, and amortization to total liabilities greater than 0.1; and a ratio of current assets to current liabilities greater than 1.5; and
 - (iv) Guarantor's tangible net worth is at least \$20 million dollars.
3. Guarantor, through subsidiaries, owns 100% of the voting stock of the Licensee Homestake Mining Company of California, a California corporation having its principal place of business, c/o Barrick Gold of North America Inc., 460 West 50 North, Suite 500, Salt Lake City, UT 84101, owner and operator of the Milan Mill, License SUA 1471.
4. **"Reclamation and Decommissioning Plans"** as used below refers to the plans maintained as required by 10 CFR Part 40, Appendix A, for the decommissioning, reclamation, and long-term surveillance and control of facilities identified above.

Covenants

5. Pursuant to the authority conferred upon Guarantor by a unanimous resolution of the Executive Committee of its Board of Directors dated June 18, 2002, a certified copy of which is attached as *Schedule A*, Guarantor guarantees to NRC that in the event the Licensee fails to perform the activities required in the NRC approved Reclamation and Decommissioning Plan, as required by the License, Guarantor shall:
- (a) Carry out the required activities; or
 - (b) Set up a trust fund in favor of NRC, its successors, or assigns in the amount of these current NRC-approved cost estimates for these activities; and
 - (c) In addition, Guarantor shall cover the eventual payment of the amount for long-term surveillance and control, if any, as required by 10 CFR Part 40, Appendix A.
6. Guarantor agrees to submit audited financial statements within 90 days of the close of each of Guarantor's fiscal years in such form and with such content consistent with generally accepted accounting principles then in effect as NRC may reasonably request.
7. Guarantor agrees that if, at the end of any fiscal year before termination of this Guaranty, based on generally accepted accounting principles, Guarantor fails to meet the financial test criteria,

Guarantor shall send within 60 days, by certified mail, notice to the NRC and to Licensee that it intends to provide alternate financial assurance as specified in Appendix A of 10 CFR Part 40, in the name of Licensee. Within 90 days after the end of the fiscal year, Guarantor shall establish such financial assurance unless Licensee has done so.

8. Guarantor also agrees to notify NRC promptly if the ownership of Licensee or Guarantor is transferred and to maintain this Guaranty until the new parent firm of Licensee provides alternate financial assurance acceptable to NRC.

9. Guarantor agrees to notify NRC, by certified mail of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code naming Guarantor as debtor, within 10 days after commencement of the proceeding.

10. Guarantor agrees that within 30 days after being notified by NRC of a determination that Guarantor no longer meets the financial test criteria or that it is disallowed from continuing as a Guarantor for the Facilities under the License, it shall establish an alternate financial assurance, as specified in 10 CFR Part 40, Appendix A, as applicable in the name of Licensee, unless Licensee has done so.

11. Guarantor as well as its successors and assigns agrees to remain bound jointly and severally under this Guaranty notwithstanding any or all of the following: amendment or modification of license or NRC-approved Reclamation and Decommissioning Plan for that facility, the extension or reduction of the time of performance of reclamation, decommissioning, and or for long-term surveillance and control or any other modification or alteration of an obligation of the Licensee pursuant to 10 CFR Part 40.

12. Guarantor agrees to remain bound under this Guaranty for so long as Licensee must comply with the applicable financial assurance requirements of 10 CFR Part 40, Appendix A, for the Facilities, except that Guarantor may cancel this Guaranty by sending notice by certified mail to the NRC and to Licensee, such cancellation to become effective no earlier than 120 days after receipt of such notice by both NRC and Licensee, as evidenced by the return receipts.

13. Guarantor agrees that if Licensee fails to provide alternate financial assurance as specified in 10 CFR Part 40, Appendix A as applicable, and to obtain written approval of such assurance from the NRC within 90 days after a notice of cancellation by the Guarantor is received by the NRC from the Guarantor, Guarantor shall provide such alternate financial assurance in the name of Licensee or make full payment under the Guaranty.

14. Guarantor and Licensee agree that all bound parties shall be jointly and severally liable for all reasonable litigation costs incurred by NRC in any successful effort to enforce the agreement against Guarantor or Licensee or any of them.

15. Guarantor expressly waives notice of acceptance of this Guaranty by the NRC or by Licensee. Guarantor also expressly waives notice of amendments or modifications by the Reclamation and Decommissioning Plan and of amendments or modifications of the license.

16. If Guarantor files financial reports with the U.S. Securities and Exchange Commission, then it shall promptly submit them to NRC during each year in which this Guaranty is in effect.

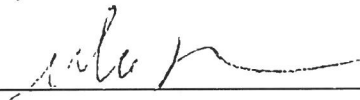
EFFECTIVE DATE: March 31, 2016

I hereby certify on behalf of the Guarantor and not in my personal capacity that the representations and warranties contained in this guarantee are true and correct to the best of my knowledge.

GUARANTOR: Barrick Gold Corporation
 BCE Place, Canada Trust Tower
 161 Bay Street, Suite 3700
 Toronto, Ontario, Canada M5J 2S1

BARRICK GOLD CORPORATION

By: 
Name: SHAUN USMAN
Title: SEVP + CFO

By: 
Name: Julie Robertson
Title: VP Controller

PROVINCE OF ONTARIO)
: ss.
CITY OF TORONTO)

On this 28th day of March, 2016, before me, Andrew Hastings, the undersigned officer, personally appeared Shawn Usman, who acknowledged ~~her~~ [her/him]self to be VP + CFO of **Barrick Gold Corporation**, an Ontario corporation, and [she/he], as such officer being authorized to do so, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by [her/him]self as such officer.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

My Commission does not Expire:

Andrew Hastings
Notary Public

Residing At:

Oakville

PROVINCE OF ONTARIO)
: ss.
CITY OF TORONTO)

On this 28th day of March, 2016, before me, Andrew Hastings, the undersigned officer, personally appeared Julie Robertson, who acknowledged [her/him]self to be VP + Controller of **Barrick Gold Corporation**, an Ontario corporation, and [she/~~he~~], as such officer being authorized to do so, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by [her/~~him~~]self as such officer.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

My Commission does not Expire:

Andrew Hastings
Notary Public

Residing At:

Oakville

I hereby certify on behalf of the Licensee and not in my personal capacity that the representations and warranties contained in this guarantee are true and correct to the best of my knowledge.

LICENSEE: HOMESTAKE MINING COMPANY OF CALIFORNIA
Grants Operation
P. O. Box 98
Grants, New Mexico 87020

LICENSE #: SUA 1471

HOMESTAKE MINING COMPANY OF CALIFORNIA

By: 
Name: **Peter Webster**
Title: **Director**

By: 
Name: **Paul D. Judd**
Title: **CFO & Tax Director**

STATE OF Utah)
COUNTY OF Salt Lake) : ss.

On this 28th day of March, 2016, before me, LeAnn Singleton-Wood the undersigned officer, personally appeared Peter Webster, who acknowledged [her/him]self to be Director of Homestake Mining Company of California, a Delaware corporation, and she/he, as such officer being authorized to do so, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by [her/him]self as such officer.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

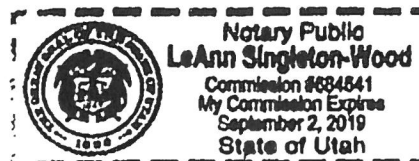
My Commission Expires:

Sep 2, 2019

LeAnn Singleton-Wood
Notary Public

Residing At:

Salt Lake City, UT



STATE OF Utah)

: ss.

COUNTY OF Salt Lake)

On this 28th day of March, 2016, before me, LeAnn Singleton-Wood the undersigned officer, personally appeared Paul D. Judd, who acknowledged [her(him)]self to be CFO & Tax Director of Homestake Mining Company of California, a Delaware corporation, and she/he, as such officer being authorized to do so, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by [her(him)]self as such officer.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

My Commission Expires:

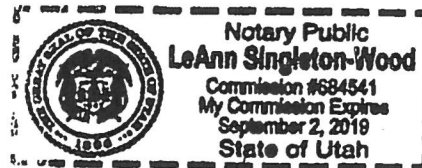
Sep 2, 2019

LeAnn Singleton-Wood

Notary Public

Residing At:

Salt Lake City UT



Schedule A

**Resolution dated June 18, 2002
Executive Committee, Board of Directors, Barrick Gold Corporation,**

BARRICK GOLD CORPORATION

Resolutions of the Executive Committee of the Board of Directors

Grants Guarantee

WHEREAS Homestake Mining Company of California ("HMCOC"), an indirect wholly-owned subsidiary of Barrick Gold Corporation (the "Corporation"), holds license SUA 1471 (the "License") for the Milan Mill and uranium recovery facilities (the "Facilities") located at Grants, New Mexico;

AND WHEREAS the United States Nuclear Regulatory Commission (the "NRC") has promulgated regulations in Title 10, Chapter 1 of the Code of Federal Regulations, Part 40, Appendix A, Criteria 9 and 10, requiring that a licensee of a uranium recovery facility provide assurance that funds will be available when needed in accordance with the approved Reclamation and Decommissioning Plan and for any long-term surveillance and control at the uranium recovery facility;

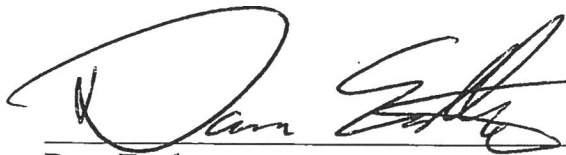
AND WHEREAS, in order to provide the necessary financial assurance, the Corporation proposes to guarantee the obligations of HMCOC pursuant to the Reclamation and Decommissioning Plan for the Facilities (the "Plan");

NOW THEREFORE BE IT RESOLVED THAT:

1. the Corporation is hereby authorized to enter into a guarantee in favour of the NRC, pursuant to which the Corporation guarantees to the NRC that in the event HMCOC fails to perform the activities required in the Plan, as required by the License, the Corporation will:
 - (a) carry out the required activities, or
 - (b) set up a trust fund in favour of the NRC, its successors and assigns, in the amount of the NRC approved cost estimates for the activities, and
 - (c) cover the eventual payment of the amount required for long-term surveillance and control, if any, as required by 10 CFR Part 40, Appendix A.
2. Any officer of the Corporation is hereby authorized to take all actions and to execute and deliver all documents and instruments, including without limitation the required form of guarantee, which such officer may determine necessary or desirable to give effect and purpose to the foregoing resolutions, such determination being conclusively evidenced by the performance of such acts or the execution of such documents or instruments by such officer.

I, Dana Easthope, the Vice-President & Corporate Secretary of Barrick Gold Corporation (the "Corporation"), hereby certify that the foregoing is a true and correct copy of a resolution passed by the Executive Committee of the Board of Directors of the Corporation on June 18, 2002, which as at the date hereof remains in full force and effect, unamended and unrevoked.

DATED this 18th day of March, 2016.

A handwritten signature in black ink, appearing to read 'Dana Easthope', is written over a horizontal line.

Dana Easthope
Vice-President & Corporate Secretary

EIGHTH AMENDMENT TO THE STANDBY TRUST AGREEMENT

EIGHTH AMENDMENT TO THE STANDBY TRUST AGREEMENT, dated as of June 24, 2026 ("EIGHTH AMENDMENT") among Homestake Mining Company of California, a California corporation, Citibank, N.A., a national bank, and U.S. Nuclear Regulatory Commission.

1. Schedule A of the STANDBY TRUST AGREEMENT, dated November 13, 2013 is amended in its entirety as follows:

This Agreement demonstrates financial assurance for the following cost estimates or prescribed amounts for the following licensed activities:

U.S. NUCLEAR REGULATORY COMMISSION LICENSE	NAME AND ADDRESS OF LICENSEE	ADDRESS OF LICENSED ACTIVITY	COST ESTIMATES FOR REGULATORY ASSURANCES DEMONSTRATED BY THIS AGREEMENT
SUA-1471	Homestake Mining Company of California 310 South Main Street, Suite 1150 Salt Lake City, Utah 84101	560 Anaconda Road, Route 605, Milan, New Mexico, 87021	\$107,961,572

The cost estimates listed here, pending NRC approval in 2026, reflect an increase in costs for decommissioning the materials and activities identified in License Number SUA-1471 due to reclamation work completed by Homestake Mining Company of California, insofar as such costs were previously approved by the NRC on September 17, 2025 in the amount of \$105,123,244.

2. Except as set forth in this Eighth Amendment, the Standby Trust Agreement is unaffected and shall continue in full force and effect in accordance with its terms. If there is a conflict between this Eighth Amendment and the Standby Trust Agreement, the terms of this Eighth Amendment will prevail.
3. This Eighth Amendment shall be governed by and construed in accordance with the laws of the State of New York.

In WITNESS WHEREOF the parties have caused this EIGHTH AMENDMENT TO STANDBY TRUST AGREEMENT to be executed by the respective officers duly authorized and the incorporate seals to be hereunto affixed and attested as of the date first written above.

HOMESTAKE MINING COMPANY OF CALIFORNIA

By: [Signature]

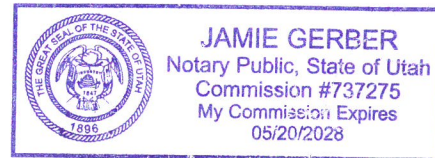
Name: Brady Tew

Title: Director

ATTEST: [Signature]

Jamie Gerber, Notary Public

[Seal]



CITIBANK, N.A., Trustee

388 Greenwich Street

New York, New York 10013

Fax: (973) 461-7191

Diana Gulyan

By: [Signature] Senior Trust Officer

Name:

Title:

ATTEST: [Signature]

[Title]

[Seal]



U.S. NUCLEAR REGULATORY COMMISSION

By: [Signature]

Name:

Title:

Jane Marshall
Director, Division of Closure, Analysis, and Financial Oversight

ATTEST: [Signature]

[Title]

[Seal]

Shawn Horwell, Chief Financial Assessment Branch

March 24, 2026

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

ATTN: Ms. Melanie Wong
Senior Project Manager
U.S. Nuclear Regulatory Commission
Decommissioning, Uranium Recovery & Waste Programs
Office of Nuclear Materials Safety and Safeguards
MS T-5A10, 11545 Rockville Pike
Rockville, MD 20852

Re: Docket# 40-8903, License# SUA-1471
Financial Test to Demonstrate Financial Assurance

Dear Ms. Wong:

I am the Senior Vice President, Deputy Chief Financial Officer of Barrick Gold Corporation, an Ontario Corporation having a principal place of business at Brookfield Place, TD Canada Trust Tower, Suite 3700, 161 Bay Street, Toronto, ON, Canada M5J 2S1 ("Barrick" and "Guarantor"). This letter is in support of Barrick's use of the financial test set forth in 10 CFR Part 30, Appendix A to demonstrate financial assurance, as required by 10 CFR Part 40, Appendix A Criteria 9.

Homestake Mining Company of California ("Licensee") is a wholly owned subsidiary of Guarantor and holds the license SUA 1471 ("License") for the Grants Mill Uranium recovery facility ("Facility"). The Facility is a closed property at which the remaining activities are decommissioning, reclamation and long-term surveillance and control.

Homestake guarantees, through the parent company guarantee submitted for compliance under 10 CFR Part 40, Appendix A, the decommissioning reclamation and long-term surveillance and control of the Licensee's facilities. The cost estimate for reclamation, decommissioning and long-term surveillance and control so guaranteed for these facilities is \$107,961,572.

I further attest that the Licensee for which this parent company guarantee is being made has a positive tangible net worth.

Guarantor is required to file, and has filed, a Form 6-K with the Securities and Exchange Commission ("SEC") for the year 2025.

The fiscal year for Barrick ends December 31. The figures for the following items marked with an asterisk are contained in or derived from Barrick's independently audited, year-end financial

statements and footnotes for the latest completed fiscal year ended in December 31, 2025. These financial statements can be found in our 2025 Year-end Report at:

<https://www.barrick.com/investors/quarterly-reports/default.aspx>

I hereby certify that the content of this letter is true and correct to the best of my knowledge.

By:



Printed name:

Bruce Luke

Title:

Senior Vice President, Deputy Chief Financial Officer

Date:

March 24, 2026

Copy To:

Document Control Desk, NRC, Washington, DC (w/encl.)

N. Olin, DOE, Grand Junction, Colorado (electronic copy)

S. Appaji, Region VI EPA, Dallas, Texas (electronic copy)

C. Thompson, NMED, Albuquerque, New Mexico (electronic copy)

M. McCarthy, Barrick, Salt Lake City, Utah (electronic copy)

D. Lattin, Barrick, Elko, Nevada (electronic copy)



Agreed-upon procedures report

Mr. Bruce Luke
Deputy CFO and Senior Vice President
Barrick Mining Corporation
Brookfield Place
TD Canada Trust Tower
161 Bay Street, Suite 3700
P.O. Box 212
Toronto ON M5J 2S1

Dear Mr. Luke:

Purpose of this agreed-upon procedures report

Our report is solely for the purpose of assisting Barrick Mining Corporation (you or Barrick) and the U.S. Nuclear Regulatory Commission (NRC) in demonstrating financial assurance prepared for the NRC, as required by 10 CFR Part 40, Appendix A Criteria 9 as at and for the year ended December 31, 2025 set forth in 10 CFR Part 30 and may not be suitable for another purpose. This report relates only to the accounts and items specified below and does not extend to any financial statements of Barrick Mining Corporation, taken as a whole.

Responsibilities of the engaging party

Barrick Mining Corporation has acknowledged that the agreed-upon procedures are appropriate for the purpose of the engagement. Barrick Mining Corporation is responsible for the subject matter on which the agreed-upon procedures are performed.

PricewaterhouseCoopers LLP
PwC Tower, 18 York Street, Suite 2500
Toronto, Ontario, Canada M5J 0B2
T: +1 416 863 1133, F: +1 416 365 8215
Fax to mail: ca_toronto_18_york_fax@pwc.com

"PwC" refers to PricewaterhouseCoopers LLP, an Ontario limited liability partnership.

Practitioner's responsibilities

We have conducted the agreed-upon procedures engagement in accordance with the Canadian Standard on Related Services (CSRS) 4400, *Agreed-Upon Procedures Engagements*. An agreed-upon procedures engagement involves our performing the procedures that have been agreed with Barrick Mining Corporation, and reporting the findings, which are the factual results of the agreed-upon procedures performed. We make no representation regarding the appropriateness of the agreed-upon procedures.

This agreed-upon procedures engagement is not an assurance engagement. Accordingly, we do not express an opinion or an assurance conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported.

Professional ethics

We have complied with the relevant ethical and independence requirements in the rules of professional conduct/code of ethics issued by the various professional accounting bodies.

Procedures and findings

We have performed the procedures described below, which were agreed upon with Barrick Mining Corporation in the terms of engagement dated March 23, 2026, on the financial test set forth in 10 CFR Part 30, Appendix A to demonstrate financial assurance prepared for the NRC, as required by 10 CFR Part 40, Appendix A Criteria 9 as at and for the year ended December 31, 2025.

1. We compared the amounts included in items 5 and 6 in the schedule attached to the letter from you to the NRC (the schedule) with the total current assets and total current liabilities included in the audited consolidated financial statements of Barrick Mining Corporation as at and for the year ended December 31, 2025, prepared in accordance with IFRS Accounting Standards as issued by the International Accounting Standards Board (the audited consolidated financial statements), and found the amounts to be in agreement.
2. In respect of items 2 through 9 in the schedule attached to the letter from Barrick to the NRC, we performed the following:
 - a. We agreed the amount included in item 2 by subtracting the grants reclamation accrual (item 1 in the schedule) from the total liabilities included in the audited consolidated financial statements, and found the amount to be in agreement with Barrick management's calculation.

- b. We agreed the amount included in item 3 in the schedule, by subtracting goodwill, intangible assets and total liabilities included in the audited consolidated financial statements from total assets included in the audited consolidated financial statements and adding item 1 in the schedule, and found the amount to be in agreement with Barrick management's calculation.
- c. We agreed the amount included in item 4 in the schedule, by adding item 1 in the schedule to total equity in the audited consolidated financial statements, and found the amount to be in agreement with Barrick management's calculation.
- d. We agreed the amount included in item 7 in the schedule by subtracting item 6 in the schedule from item 5 in the schedule, and found the amount to be in agreement with Barrick management's calculation.
- e. We agreed the amount included in item 8 in the schedule by adding depreciation included in Note 7 – Cost of sales of the audited consolidated financial statements to the net income included in the audited consolidated financial statements, and found the amount to be in agreement with Barrick management's calculation.
- f. We agreed item 9 in the schedule to the non-current assets in the United States included in Note 5 – Segment Information to the audited consolidated financial statements, and found the amount to be in agreement.
- g. We recomputed the calculations supporting Barrick's responses to items A.1 (i) through (iv) in the schedule, as noted below:
 - i. For A.1 (i) question 1, we divided item 2 in the schedule by item 4 in the schedule and confirmed that the result is less than 2.0.
 - ii. For A.1 (i) question 2, we divided item 8 in the schedule by item 2 in the schedule and confirmed that the result is greater than 0.1.
 - iii. For A.1 (i) question 3, we divided item 5 in the schedule by item 6 in the schedule and confirmed that the result is greater than 1.5.
 - iv. For A.1 (ii) question 1, we divided item 7 in the schedule by item 1 in the schedule and confirmed that the result is at least 6.0 times item 1.

- v. For A.1 (ii) question 2, we divided item 3 in the schedule by item 1 in the schedule and confirmed that the result is at least 6.0 times item 1.
 - vi. For A.1 (iii) we confirmed that item 3 in the schedule is at least \$21 million.
 - vii. For A.1 (iv) question 1, we divided item 9 in the schedule by total assets in the audited consolidated financial statements and confirmed that the result is less than 90%.
 - viii. For A.1 (iv) question 2, we divided item 9 in the schedule by item 1 in the schedule and confirmed that the result is at least 6.0 times item 1.
3. We inquired with Jeff Davidson (Controller) on March 18, 2026 whether Barrick had any off-balance sheet arrangements as at December 31, 2025 that could materially adversely affect the parent company's ability to pay for decommissioning costs, and no such transactions were noted.
 4. We inspected the minutes of Barrick's Board of Directors meetings that were held during the year-ended December 31, 2025 to identify any reference to off-balance sheet transactions, and no such transactions were noted in the minutes, other than as disclosed in the audited consolidated financial statements.
 5. We inspected the audited consolidated financial statements, including the Report of Independent Registered Public Accounting Firm (the auditor's report) in order to confirm if there is an emphasis of matter paragraph in respect of Barrick's ability to continue as a going concern and to confirm the amount of operating and capital commitments disclosed as at December 31, 2025. We noted that there is no emphasis of matter paragraph included in the auditor's report in respect of Barrick's ability to continue as a going concern. Further, we note the following 1) Note 19 (c), Capital Commitments, to the audited consolidated financial statements includes reference to operational commitments for construction activities of \$2,329 million USD as at December 31, 2025; 2) Note 19 (d), Other Lease Disclosure, to the audited consolidated financial statements includes reference to short-term payments and variable lease payments not included in the measurement of lease liabilities of \$10 million and \$165 million USD respectively as at December 31, 2025; 3) Note 2 (b) includes reference to commitments of \$893 million relating to its interest in its joint ventures as at December 31, 2025.
 6. We selected the Q1 2025 and Q4 2025 quarterly instances of the control performed by management for control CO-C-148, and 20 instances of the control CO-C-183. We noted that management identified no exceptions in their testing of control CO-C-148 or CO-C-183.

The instances of the control for CO-C-183 that we selected are noted below:

I.	Sample 1, Issue 3304, Q1 2025	X.	Sample 11, Issue 3073, Q2 2025
II.	Sample 2, Issue 3304, Q2 2025	XI.	Sample 12, Issue 3073, Q3 2025
III.	Sample 3, Issue 3279, Q1 2025	XII.	Sample 13, Issue 3316, Q3 2025
IV.	Sample 4, Issue 3279, Q2 2025	XIII.	Sample 14, Issue 3313, Q3 2025
V.	Sample 5, Issue 3287, Q1 2025	XIV.	Sample 15, Issue 3308, Q3 2025
VI.	Sample 6, Issue 3287, Q2 2025	XV.	Sample 16, Issue 3303, Q4 2025
VII.	Sample 7, Issue 3297, Q1 2025	XVI.	Sample 17, Issue 3320, Q4 2025
VIII.	Sample 8, Issue 3297, Q2 2025	XVII.	Sample 18, Issue 3131, Q4 2025
IX.	Sample 9, Issue 3297, Q3 2025	XVIII.	Sample 19, Issue 3190, Q4 2025
XIX.	Sample 10, Issue 3073, Q1 2025	XX.	Sample 20, Issue 3279, Q4 2025

7. Barrick management has provided a written representation letter to us stating that Barrick did not have any off-balance sheet arrangements as at December 31, 2025 that could materially adversely affect its ability to pay for decommissioning costs.

Restriction on distribution and use

Our report is intended solely for Barrick Mining Corporation and the NRC. We neither assume nor accept any responsibility or liability to any other third party in respect of this report. Our report should not be distributed to parties other than Barrick Mining Corporation and the NRC.

PricewaterhouseCoopers LLP

Chartered Professional Accountants

March 24, 2026

HOMESTAKE MINING COMPANY OF CALIFORNIA
FINANCIAL TEST TO DEMONSTRATE FINANCIAL ASSURANCE
(In millions of US dollars)

1. Sum of decommissioning, reclamation and long -term Surveillance and control estimates for facilities SUA 1471.	\$ 108
2. Total liabilities	\$ 15,553
3. Tangible Net Worth	\$ 32,842
4. Total Net Worth	\$ 36,024
5. Current Assets	\$ 10,217
6. Current Liabilities	\$ 3,497
7. Net Working Capital (line 5 minus 6)	\$ 6,720
8. The sum of net income plus depreciation ¹	\$ 9,060
9. *Total Assets in U.S.* (required only if less than 90 percent of firm's assets are located in the U.S.).	\$ 17,335

Denotes figures contained in or derived from Barrick Gold Corporation's December 31, 2025 consolidated financial statements.

¹ \$1906 of depreciation was added back to net income

Financial test set forth in 10 CFR Part 30, Appendix A. To pass the financial test, the parent company must meet the criteria of either paragraph A.1 or A.2 of this section.

A.1

(i) Guarantor must pass two of the following three tests.

- | | Yes | No |
|--|-----|----|
| Are total liabilities (line 2) divided by net worth (line 4) less than 2.0? | X | |
| Is net income plus depreciation (line 8) divided by total liabilities (line 2) greater than 0.1? | X | |
| Are current assets (line 5) divided by current liabilities (line 6) greater than 1.5? | X | |

- | | | |
|---|---|--|
| (ii) Is net working capital (line 7) at least 6 times the site cost estimate (line 1)? AND
Is tangible net worth (line 3) at least 6 times the site cost estimate (line 1)? | X | |
| | X | |

- | | | |
|---|---|--|
| (iii) Is tangible net worth (line 3) at least \$21 million? | X | |
|---|---|--|

- | | | |
|---|---|---|
| (iv) Are 90% of firms assets in US? | | X |
| If not, are the total assets in U.S. (line 9) at least 6 times the site cost estimate (line 1)? | X | |

A.2 SINCE BARRICK PASSED A.1, WE HAVE NOT PERFORMED A.2

- | | |
|---|--|
| (i) A current rating for its most recent uninsured, uncollateralized, and unencumbered bond issuance of AAA, AA, A, or BBB (including adjustments of + and -) as issued by Standard and Poor's or Aaa, Aa, A, or Baa (including adjustment of 1, 2, or 3) as issued by Moody's; | |
| (ii) Is total net worth (line 4) at least 6 times the site cost estimate (line 1)? | |
| (iii) Is tangible net worth (line 3) at least \$21 million? | |
| (iv) Are 90% of firms assets in US? | |

- | |
|---|
| If not, are the total assets in U.S. (line 9) at least 6 times the site cost estimate (line 1)? |
|---|

NRC FORM 313 U.S. NUCLEAR REGULATORY COMMISSION

(11-25-2025)
10 CFR 30, 32,
33, 34, 35, 36,
37, 39, and 40APPLICATION FOR
MATERIALS LICENSE

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 07/31/2026

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to Infocollections.Resource@nrc.gov, and the OMB Reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0120), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>. SEND ONE COPY OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW OR ONLINE AT <https://www.nrc.gov/security/byproduct/ismpl/wbl.html>.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY AND LICENSING BRANCH
DIVISION OF MATERIALS SAFETY, SECURITY, STATE AND TRIBAL PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
11555 ROCKVILLE PIKE
ROCKVILLE, MD 20852-2738

*NOTE: The preferred method to submit NRC Form 313 is online at <https://www.nrc.gov/security/byproduct/ismpl/wbl.html> or email at LBLicensingAssistant.Resource@nrc.gov.
Any other documents (e.g., financial assurance documents) should be sent via email.

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA,
GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE,
NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO,
RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN
ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

*NOTE: The preferred method to submit NRC Form 313 is online at <https://www.nrc.gov/security/byproduct/ismpl/wbl.html> or email at R1DRSSMail.Resource@nrc.gov.
Any other documents (e.g., financial assurance documents) should be sent via email.

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657

*NOTE: The preferred method to submit NRC Form 313 is online at <https://www.nrc.gov/security/byproduct/ismpl/wbl.html> or email at R3-DRSSMAIL.Resource@nrc.gov.
Any other documents (e.g., financial assurance documents) should be sent via email.

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH
DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS,
UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

*NOTE: The preferred method to submit NRC Form 313 is online at <https://www.nrc.gov/security/byproduct/ismpl/wbl.html> or email at R4licensing@nrc.gov.
Any other documents (e.g., financial assurance documents) should be sent via email.

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- ☐ A. NEW LICENSE
- ☒ B. AMENDMENT TO LICENSE NUMBER SUA-1471
- ☐ C. RENEWAL OF LICENSE NUMBER _____

3. LIST ADDRESS AND/OR TEMPORARY JOB SITE (TJS) ADDRESS, WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

Homestake Mining Company of California
560 Anaconda Road
Route 650
Milan, NM 87021

2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code)

Homestake Mining Company of California
P.O. Box 98
Grants, NM 82070

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Eric Burch

BUSINESS TELEPHONE NUMBER

(505) 278 4456 ext. 34

BUSINESS CELLULAR TELEPHONE NUMBER

775 934 1766

BUSINESS EMAIL ADDRESS

eburch@barrick.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE APPLICABLE [LICENSING GUIDANCE](#).

5. RADIOACTIVE MATERIAL

- a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, at time of application submission, with few exceptions*)
(See 10 CFR 170 and Section 170.31)

*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.

FEE
CATEGORYAMOUNT
TO BE
PAID VIA
\$
www.pay.gov

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html>. FAX THE COMPLETED NRC FORM 531 TO (301) 415-6725.

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Eric Burch Closure Manager

SIGNATURE

Eric Burch
Signer ID: X00ZKJ0E14...

DATE

03/25/2026