

40-8903



Grants Project

Homestake Mining Company of
California

Thomas Wohlford
Closure Manager

28 November 2017

ATTN: Mr. Matthew Meyer
Project Manager
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Division of Decommissioning, Uranium Recovery and Waste Programs
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New Mexico Environment Department
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Santa Fe, NM 87502-5469

ATTN: Mr. Christopher Burrus
New Mexico Office of the State
Engineer 5550 San Antonio Drive,
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RE: Revised Scope of Work - Re-Seeding of Former Land Application Areas for Dust Control

Dear Sirs:

Homestake Mining Company's (HMC) is proposing to re-seed three of the former land application areas with native vegetation to aid the re-establishment of vegetation to decrease the dust from these areas at the Grants Reclamation Project site. The amount of dust and earth blowing from the non-vegetated areas on the southern portion of the Grants site has generated a number of complaints from local residents who are currently forming a committee to push both HMC and the Village of Milan, who also has some non-vegetated properties to the south, to act on the issue. HMC respectfully requests NRC review and approval of this scope of work.

HMC formally irrigated 120 acres in Section 34 by flood irrigation and 150 acre center pivot in Section 33. Figure 1 shows the locations of the four irrigation areas. Additionally, 24 acres of

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flood irrigation was performed in Section 33. HMC also irrigated 100 acres by center pivot in Section 28 where the vegetation is reasonably established and not part of this scope of work. These are the former land application areas where HMC formerly used slightly-impacted groundwater to irrigate and grow forage crops such as hay and alfalfa from 2000 to 2012. As part of the NRC Confirmatory Order, HMC compiled a Land Application Assessment of these areas that was submitted to the NRC and NMED on September 25, 2017.

Land Preparation and Re-Seeding:

The re-seeding is proposed to be done prior to the monsoon season in 2018 and is discussed for each area below. HMC reached out to a local experienced re-vegetation contractor (Taylor Services) regarding the process of re-seeding Sections 33 and 34. Before re-seeding, the areas will be prepared by leveling off the soil piles that have built up due to wind transport to match the surrounding terrain. An area where adequate vegetation exists should not be disturbed and not re-seeded. Dust suppression activities will be performed using a water truck during plowing and earth-work activities. Compliant water from HMC's San Andres Fresh Water Deep Well No. 2 will be used to fill the water truck. Thereafter, the ground will be prepared for the seed mix using a disc plow or other related pre-seeding ground preparation methods. Following ground preparation activities, a seed mixture of vegetation native to the surrounding area will be planted in the areas using the acre-spread rates and depths recommended by the Natural Resources Conservation Service (NRCS). The seed mixture (as recommended by the NRCS) will include the following plant species shown in Table 1.

Table 1. NRCS Recommended Native Seed Mix

Species	% of Mix	Seeding Rate (lbs/ac)	Ave. Purity (%)	Aver. Germ. (%)
Alkali Sacaton (Salado)	1%	0.7	95%	70%
Gramma, Blue (Hachita)	1%	0.5	70%	60%
Sand Dropseed	1%	0.1	85%	80%
Wheatgrass, Western (Arriba)	15%	9.3	85%	60%
Saltbrush, Fourwing	82%	49.5	80%	80%

Section 34 Flood Area:

The attached **Photo 1** shows the windblown material in the Section 34 former flood irrigation area which consist of 120 acres. This area shows very little vegetation and needs re-vegetation. Areas where some vegetation exists should not be disturbed if they can be avoided and not re-seeded.

Section 33 Center Pivot and Flood Area:

The South pivot area is shown in **Photo 2** with some vegetation shown near the center of the pivot. Sandy areas should not be disc plowed or leveled prior to re-seeding. **Photo 3** shows the 24 acre of flood area in Section 33. Areas where some vegetation exists should not be disturbed and not re-seeded.



Photo 1. Section 34 120-Acre Former Flood Irrigation Area.

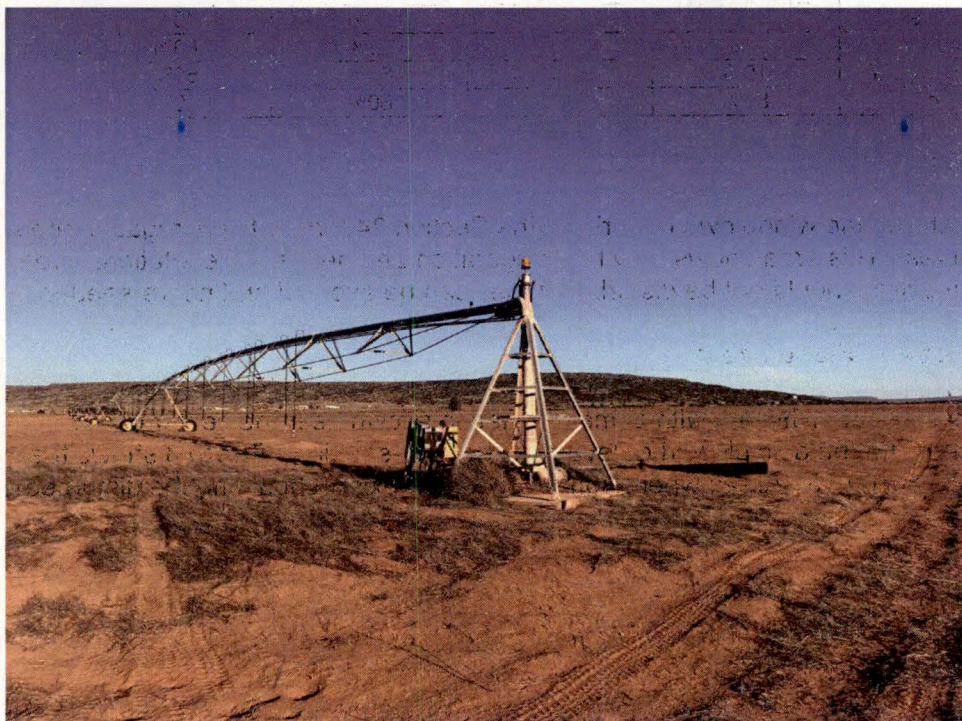


Photo 2. Section 33 Former 150-Acre South Center Pivot Area.

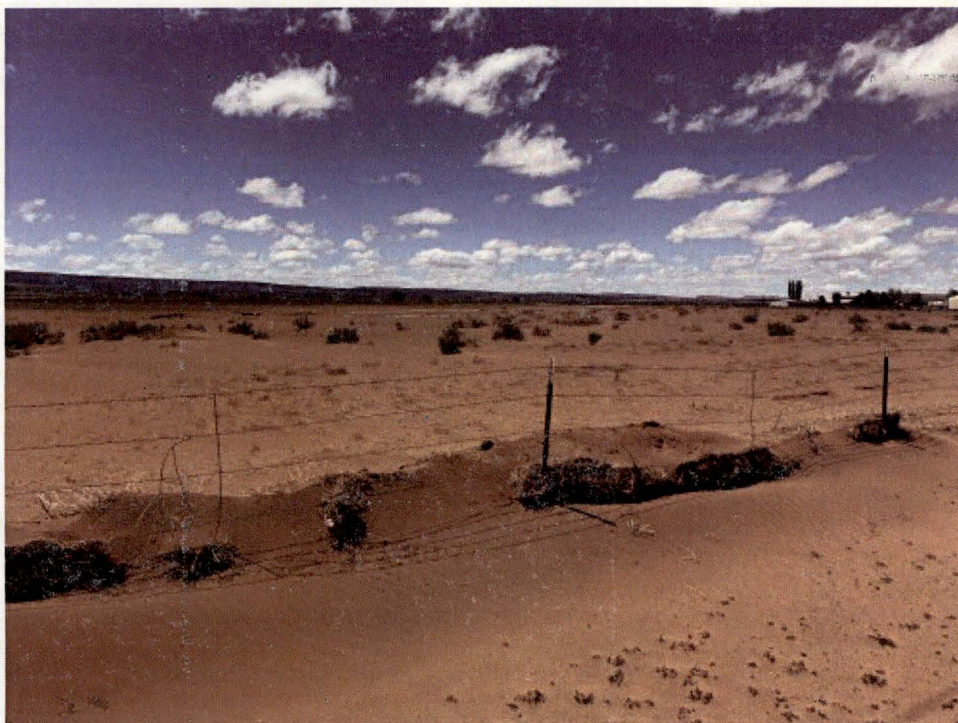


Photo 3. Section 33 Former 24-Acre Flood Irrigation Area.

Thank you for your time and attention on this matter. If you or anyone on your staff has any questions, please contact me at the Grants office at 505.287.4456, extension 34, or call me directly on my cell phone at 505.290.2187.

Respectfully,

Thomas Wohlford

Closure Manager
Homestake Mining Company of California
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Copy To:

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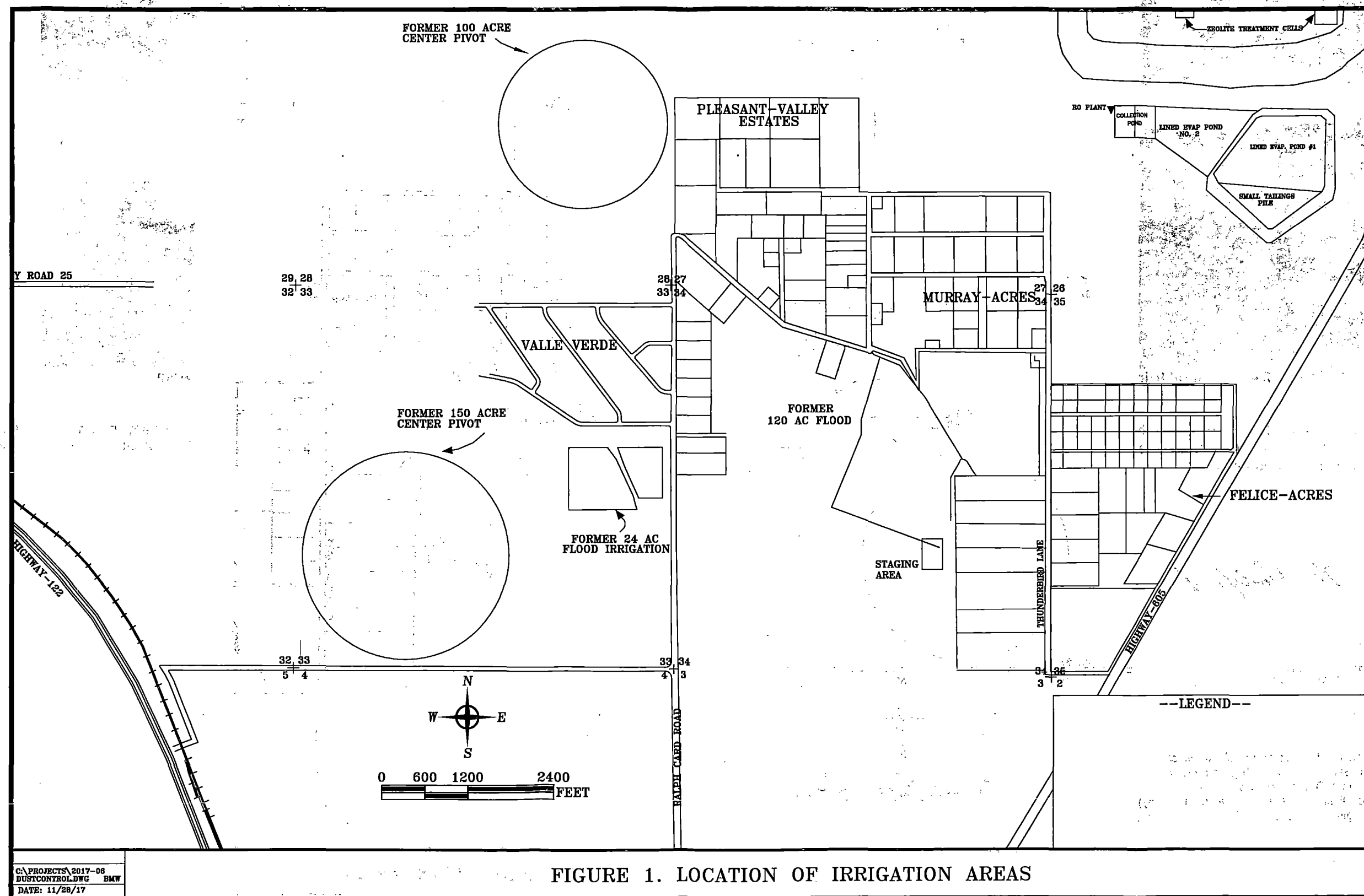


FIGURE 1. LOCATION OF IRRIGATION AREAS

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DATE: 11/28/17