INTERA Incorporated
2440 Louisiana Blvd. NE, Suite 700
Albuquerque, NM 87110
+1 (505) 246 1600
INTERA.com

September 10, 2025

Ms. Miori Harms
Uranium Mine Reclamation Coordinator
New Mexico Environment Department
Office of Strategic Initiatives
121 Tijeras Ave NE, Suite 1000
Albuquerque, NM 87102

RE: Proposed Approach for Moe No. 4 Uranium Mine Assessment and Reclamation, McKinley County, New Mexico

Dear Ms. Harms,

INTERA Incorporated (INTERA) is pleased to submit our proposed approach for assessment and reclamation of the Moe No. 4 abandoned uranium mine site (the Site) in McKinley County, New Mexico. Moe No. 4 was last operated in the early 1960s and is located east of San Mateo Creek approximately 12 miles north of Milan and Grants along NM 605 (approximately 35.313011 N, -107.813102 W). The Site is located on New Mexico State trust land managed by the New Mexico State Land Office (SLO) and is accessed through gated private property along an unpaved road on the east side of NM 605.

This document incorporates the requirements of the New Mexico Environment Department (NMED) *Notice to Proceed* dated July 10, 2025. INTERA will follow this phased approach required to reclaim and remediate the Site to the New Mexico radiation cleanup criteria "5/15 standard" (EMNRD and NMED, 2016).

1. Project Planning and Preliminary Community Engagement

The first phase of the project will focus on project planning, background review, and community engagement. Project planning includes the completion of work plans and other documents to guide Stage 2 field activities. INTERA will bring in elements from previous work scopes, along with any newly available references to prioritize data gap investigation. We will partner with Sundance Consultants, LLC (Sundance) to complete public involvement and community engagement deliverables and facilitate such activities as necessary. In collaboration with the New Mexico Mining and Mineral Division (MMD) Abandoned Mine Lands (AML) Program and NMED, INTERA and Sundance will review the potential for endangered species, archaeological, and cultural resources at the Site. It is INTERA's understanding that AML will issue scope task orders to facilitate this resource evaluation.

Throughout the project, we will perform project management activities such as providing monthly progress reports, invoicing, and hosting weekly meetings to facilitate progress. Ashley Arrossa, the project manager, will serve as the designated INTERA project manager to streamline communications with NMED outside of regular meetings.

Key deliverables from the first phase of the project will include:

- **Data Gap Summary Technical Memorandum:** Engineering subcontractor Engineering Analytics provided an internal technical memorandum draft summarizing data gaps that require further investigation to facilitate design and cleanup implementation at the Site. The Site Assessment Work Plan will incorporate elements to resolve the data gap items.
- **Stage 1 Uranium Mine Site Assessment Records Review:** INTERA will conduct a review of existing site assessments and available information for the site, including a title search confirming 'no viable responsible party'. INTERA would like to distinguish this "Stage 1" terminology from the NMAC language associated with Stage 1 Abatement (i.e., 20.6.2 NMAC).
- **Community Engagement Plan & Public Involvement Plan**: INTERA and Sundance will develop key community engagement planning document in coordination with NMED Community Engagement Coordinator Kate Cardenas (NMED).
- **Health and Safety Program:** INTERA will develop site-specific health and safety plan(s) (SSHASPs) to guide safety practices for future fieldwork and earthwork activities. Job Hazard Analyses (JHAs) will identify key tasks, associated risks, and proposed safety measures. They will be reviewed and acknowledged before any fieldwork is executed. SSHASPs are available upon request.
- **Site Assessment Work Plan**: INTERA, radiation safety subcontractor AVM Environmental Services Inc. (AVM), and Engineering Analytics will produce a work plan for Stage 2 assessment activities. The work plan will describe the proposed methodology and extents of a full-site radiological screening survey and locations of proposed Stage 2 soil and/or overburden samples. For the purposes of work plan development, the term "overburden" is defined as rock, waste rock, potential mine spoils, or other competent material. The Work Plan will also include a description of how the proposed samples will be used to determine background radiological concentrations in soil and/or overburden, and how we will produce a calibration curve between survey values and laboratory-measured Ra-226 concentrations to set a cleanup level for the Site. Additional data collection plans may also be proposed to support reclamation implementation such as geotechnical, geophysical, or hydrogeologic/hydraulic investigations; if more time is needed for strategy, INTERA will submit those plans to NMED under separate cover. The *Site Assessment Work Plan* will include elements such as a *Sampling and Analysis Plan* describing the field radiological screening instrumentation, sampling strategy, analytical techniques, and a concise *Quality Assurance Project Plan (QAPP)* outlining quality assurance/quality control (QA/QC) protocols. The *Site Assessment Work Plan* will be submitted to NMED and NMSLO for approval as a 'field investigation proposal' as required by the contract.
- **Archaeological, Ecological, & Cultural Surveys:** Sundance and INTERA will work with AML, NMED and other agencies to review the potential for endangered species and archaeological/cultural resources at the Site. AML has issued Scope of Work (SOW) guidance that aligns with their program for both the cultural work and Biological Assessment/Biological Evaluation (BA/BE) tasks. The Cultural Resource (CR) SOW includes completing archaeological field investigations, site documentation, analysis, and reporting. The BA/BE SOW generally includes an assessment of natural resources including vegetation, special status, threatened and endangered species, general wildlife, geological and soil resources, water resources, surface water, and wetlands and waters of the United States. Both the CR and BA/BE SOWs encompass the Area of Potential Effect

(APE) totaling 82 acres. INTERA has provided letter responses to both SOWs detailing the proposed scheduled field dates.

- **Baseline Survey Data:** INTERA will collect information on parcel boundaries, topography, and collect baseline pre-restoration imagery of the area. This will be accomplished by three (3) separate spatial data acquisition methods: 1) A parcel boundary survey and limited ground control survey will be completed within the estimated extent of mine disturbance, including transects within the subsidence(s) that can be safely accessed. 2) An unmanned aerial vehicle (UAV) will collect orthoimagery for the entire APE, along with spatial data. 3) LiDar will be collected utilizing an UAV within the area of subsidence and the mine decline feature with finer point precision. This data includes ground lidar scans of Site topography and features. The nominal scan accuracy and resolution is 1 cm or better within the 2-acre Site footprint. All three spatial data sources will be utilized to interpolate the bare earth elevations and determine volumes of subsidence and stockpiled overburden present at the surface. The UAV photography, ground lidar data, and ground measured elevation points will be integrated to produce a classified point cloud, DSM, DEM, and orthoimage. The anticipated resolution of the DSM/DEM will be 6 inches and the orthophoto will be 2 inches.

2. Field Investigation and Data Collection

In Phase 2 of the project INTERA will implement the activities in the *Work Plan*. Key deliverables from this phase will include:

- **Stage 2 Uranium Mine Assessment Radiological Characterization & Soil Sampling:** AVM will conduct high-resolution characterization on the magnitude and extent of radiological contamination through ground surveying and soil sampling. Work will be performed according to the approved plans outlined under Stage 1.
- **Supplemental Engineering Data Collection**: Engineering Analytics will work with INTERA to collect geotechnical, and/or geophysical data to collect sufficient information for closure engineering design.
- **Continued Community Engagement:** INTERA will continue to organize and plan community engagement in coordination with NMED and NMSLO to inform residents and other stakeholders of the proposed actions on the mine site.
- **Finalize Archaeological, Ecological & Cultural:** INTERA and Sundance will finalize any survey work prior to breaking ground in Stage 3.

3. Feasibility Study

INTERA and Engineering Analytics will produce a report summarizing the nature and extent of contamination, proposed cleanup level, estimated volume of contaminated material, and disposal and safeguarding options. The report will also identify potential backfill areas, with at least three alternatives provided at a 30% design level, and will include a ranked list of recommended options with a recommendation on the preferred approach. For each proposed cleanup and/or safeguarding alternative, INTERA and Engineering Analytics will provide a description, proposed schedule, preliminary cost estimate, construction disturbance footprints/construction access route maps, design life, and future

monitoring and maintenance requirements. At this point in time, INTERA may also coordinate with NMED to continue any community engagement and/or comment processes with the public.

4. Closure Plan and Cost Estimate

Using the selected approach from the *Feasibility Study*, INTERA will provide a comprehensive closure plan that will follow applicable guidance and outline techniques for remediation and closure, post-reclamation stabilization techniques, and engineered designs that will also account for climate change (such as re-establishing vegetation in a drier climate). INTERA will also develop a time-oriented plan and schedule for each phase of reclamation, update the HASP to account for the selected remedy, and coordinate a stormwater pollution prevention plan (SWPPP) or similar.

5. Implementation of Selected Reclamation Method

INTERA will oversee reclamation activities selected under Phase 4, coordinating equipment and personnel mobilization to implement the final closure plan in accordance with the approved safety protocols. Cleanup and closure will be prioritized to address the hazards and features at the Site that pose the highest risk to any public receptors. This includes prioritizing safeguarding the mine portal entry (decline), removing the surficial material with elevated radioactivity or analytes above cleanup criteria, with either on-Site or off-Site disposal, and disposition of any debris or waste material such as structure relics and vehicles or equipment. The site will be contoured and stabilized to manage drainage and minimize erosion risks. At the conclusion of the reclamation work, AVM will perform a follow-up *Final Status Survey* to confirm that final radiological concentrations meet project objectives.

6. Phase 3 UMSA: Final Reclamation and Restoration Report

The final project report will describe how restoration activities were achieved, suggested supplemental actions, practices to aid remediation at other sites, and lessons learned. The report will also include information from the final radiological survey, and calculations of material volumes moved and removed. INTERA will also create a long-term monitoring and management plan to NMED and NMSLO outlining strategies for sustained reclamation success. INTERA will collect post-reclamation aerial imagery and create other supporting materials as needed to document project success. INTERA will also work with NMED to host a community town hall to summarize reclamation efforts.

If you have any questions about the proposed approach, please do not hesitate to reach out to me at (505) 832-3168 or aarrossa@intera.com.

Sincerely,

INTERA Incorporated

Ashley Arrossa, P.E.
Project Manager

Enclosure

References

Energy, Minerals & Natural Resources Department (EMNRD), Mining and Minerals Division, & New Mexico Environment Department (NMED), Mining Environmental Compliance Section. 2016. Joint guidance for the cleanup and reclamation of existing uranium mining operations in New Mexico. Santa Fe, NM. March.

Table 1. Estimated project timeline, subject to change.

Project Phase	Task Name	Who	Preliminary Deadline
1	Monthly Progress Reports (15th of each month)	INTERA	Recurring, monthly
	Public Involvement Plan	Sundance	Submitted August 29, 2025
	Community Engagement Plan Final	Sundance	September 18, 2025
	Stage 1 UMSA Records Review	INTERA	September 19, 2025
	HASP & JHA Development	INTERA	August 31, 2025
	Archaeological/ Cultural Resource Report Final	Sundance	September 23, 2025
	Endangered Species Site Survey Final	Sundance	November 11, 2025
	Stage 1 UMSA Work Plan	INTERA, EA, AVM	October 13, 2025
	Approval for Stage 1 UMSA by NMED and NMSLO	NMED, NMSLO	To be determined
2	Stage 2 UMSA Fieldwork	INTERA, AVM	Tentatively October2025
	Supplemental Engineering Data Collection	EA	To be determined, Fall 2025
	Continued Community Engagement	INTERA, NMED	Ongoing
	Stage 2 UMSA Site Investigation Report Submission	INTERA	November 21, 2025
	EA Summarizes Geotechnical Investigation Findings	EA	December 14, 2025
3	Feasibility Study (30% Design for Three Alternatives)	EA	January 15, 2026
4	Closure Plan and Cost Estimate	EA	February 27, 2026
5	Implementation of Selected Reclamation Method	INTERA, Enviroworks	Tentatively April 2026
6	Phase 3 UMSA Final Reclamation and Restoration Report	INTERA	Tentatively May 2026