



Utah!

Where ideas connect

Department of Environmental Quality
Division of Radiation Control

Michael O. Leavitt
Governor

Dianne R. Nielson, Ph.D.
Executive Director

William J. Sinclair
Director

168 North 1950 West
P.O. Box 144850
Salt Lake City, Utah 84114-4850
(801) 536-4250
(801) 533-4097 Fax
(801) 536-4414 T.D.D.
www.deq.utah.gov

JUL 7 - 2003

June 30, 2003

Elmo E. Collins, Director
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

RE: Draft Environmental Assessment Dealing With Core Laboratories, Inc.

Dear Mr. Collins:

The purpose of this letter is to advise you that staff members of the Utah Division of Radiation Control have reviewed a draft Environmental Assessment relating to a license amendment request proposed by Core Laboratories, Inc. (dba Pro Technics) of Houston, Texas. The licensee requested approval of an additional disposal alternative that involves injection of well returns containing radioactive tracer material into Class II disposal well that have been approved to accept non-hazardous oil and gas waste by State Agencies.

In general, we support the conclusions presented in the Environmental Assessment. For more specific comments, we believe it is important that the applicant develop and utilize appropriate procedures to address or contain any spills of radioactive well returns when injecting into a Class II disposal well. We assume that the applicant will inject the beads by fracturing the formation to emplace them. While this may work well in some states, such as Alaska where they routinely inject over parting pressure and inject wastes such as cuttings, etc., it may not be applicable in Utah. The Division of Oil Gas and Mining of the Utah Department of Natural Resources does not routinely allow injection over parting pressure and, when approved, requires somewhat special circumstances and additional permitting to do so.

If you have any questions about our comments, please contact Craig W. Jones at (801) 536-4250 or cwjones@utah.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. Sinclair".

William J. Sinclair, Director
Division of Radiation Control