RAS 9948

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
E. Roy Hawkens, Presiding Officer
Dr. Richard F. Cole, Special Assistant
Dr. Robin Brett, Special Assistant

In the Matter of:	
Hydro Resources, Inc. P.O. Box 777 Crownpoint, NM 87313	Docket No.: 40-8968-ML Date: May 6, 2005

HYDRO RESOURCES, INC.'S RESPONSE IN OPPOSITION TO INTERVENORS' WRITTEN PRESENTATION REGARDING GROUNDWATER, GROUNDWATER RESTORATION AND FINANCIAL ASSURANCE

NOTICE OF ERRATA

Hydro Resources, Inc. (HRI), by its undersigned counsel of record, hereby submits this Notice of Errata for HRI's filing of April 21, 2005 entitled *Hydro Resources, Inc.'s Response in Opposition to Intervenors' Written Presentation Regarding Groundwater, Groundwater Restoration and Financial Assurance* and its May 4, 2005 filing entitled *Submission of Index for Written Presentation Attachments.*

In this filing, HRI hereby submits two specific amendments to its attachments submitted as supporting documentation for the Affidavit of Mr. Mark S. Pelizza (Exhibit A). The following bullet points describe the additions to HRI's Exhibit A attachments.

- With respect to HRI's May 4, 2005 filing, the description of Attachment G to Exhibit A should be deleted and the following language should be added:

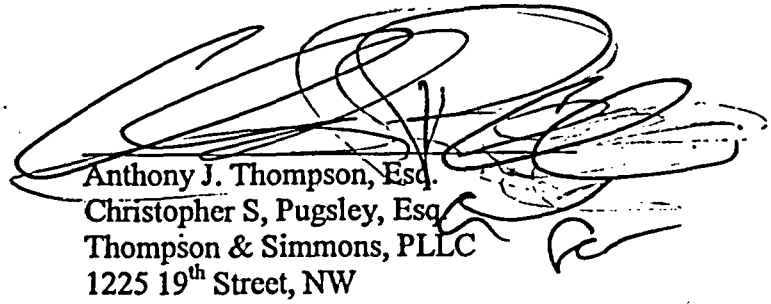
Template = SECY-021

SECY-02

"Attachment G to Exhibit A presents excerpts of an affidavit submitted by Intervenors regarding the testimony of Richard Abitz. These excerpts are cited by Mr. Pelizza at ¶ 69 of Exhibit A."

- With respect to HRI's April 21, 2005 filing, an additional Attachment referenced at ¶ 251, 252, & 254 of Exhibit A should be added. This Attachment, hereinafter labeled Attachment W, includes excerpts from Section 2 of HRI's Crownpoint Restoration Action Plan (RAP) submitted to the Nuclear Regulatory Commission (NRC) Staff on November 19, 2001. These excerpts address RAP cost estimates for groundwater restoration at the CUP.

Respectfully Submitted,



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ATTACHMENT W

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2. Groundwater Restoration

2.1. Introduction

In addition to the regulatory guidance provided by NRC, HRI used historic and ongoing company experience with similar groundwater restoration operations in developing its budget model. Groundwater restoration costs are presented as a monthly restoration budget with cumulative total costs. This is an appropriate budget interval because ongoing operational cost such as labor, electricity, reagents, replacement equipment etc. are paid out of cash on a monthly basis. The duration of the restoration cost expenditure was based on the processing and circulation of 9 pore volumes of groundwater as required by license condition 9.5 surety requirement. Surety will be maintained at this level until the number of pore volumes required to restore the ground water quality of a production scale wellfield has been demonstrated as stated in COP Section 10.4.4.

The COP that was submitted in support of the HRI's License contemplated a number of methods for liquid waste treatment and disposal during ground water restoration. The costs that are presented in this budget assume the most conservative liquid waste treatment and disposal option; reverse osmosis treatment ("RO") and brine concentration ("BC"). It is conservative because it is authorized by the current license (other options would require additional licensing steps) and it is the most costly option. If HRI is to pursue one of the other treatment/disposal options described in the COP Revision 2.0 and it is approved in a future licensing action, then HRI will adjust the surety budget accordingly during the annual update review.

RO and BC will be used to treat water during production operations and be used for groundwater restoration conducted in the pilot demonstration and during concurrent restoration that will be ongoing with production activities. Because the cost of restoration equipment such as wellfield pumps, ponds, the RO unit, the BC unit, laboratory equipment, trucks, and field equipment must be incurred for production process operations, they are assumed to be operational capital and are not included as capital requirements in any of the RAP budget lines. NRC will be able to verify the availability of the restoration equipment during routine inspections.

The budget model described in this RAP used 2,102,609,094 gallons of water to size duration of the restoration program against the projected nominal equipment capacity. Rows 21-42 of the restoration budget is a monthly calculation of water treatment capacity that has been cumulated over the term of restoration and compared with the required nine pore volumes of treated water. It is nominal equipment design capacity that is needed to process the requisite gallonage that justifies the length (and cost) of groundwater restoration operations.

2.2. Reverse Osmosis Equipment Description

Reverse osmosis is a water treatment process whereby the majority of dissolved "ions" are filtered from the wastewater, and concentrated into a smaller concentrated brine volume. The resulting product water typically meets, or exceeds drinking water standards, and during restoration activities, is reinjected back into the wellfield further diluting the underground mining

solutions toward baseline quality. For the purpose of this budget model, the concentrated brine stream, representing 20% of the feed volume will be disposed by brine concentration (a form of distillation).

Osmosis is a natural process that occurs in all living cells. With an appropriate semi-permeable membrane as a barrier to solutions of differing concentrations, naturally occurring osmotic pressure forces pure water from the dilute solution to pass through the membrane, and dilute the more concentrated solution. This process will continue until equilibrium exists between the two solutions.

Reverse osmosis (R.O.) is a reversal of the natural osmotic process. By confining a concentrated solution against a semi permeable membrane, and applying a reverse pressure on the concentrate greater than the naturally occurring osmotic pressure, water will move across the membrane ("product water"), and out of the original concentrate, resulting in an even more concentrated solution ("brine"). The membrane rejects the passage of the majority of the dissolved solids while permitting the passage of water.

Post-mining solutions from a depleted mine area will be treated with an anti-scalent which is the only chemical pretreatment budgeted. The solution may next be bulk-filtered across sand filters to remove all solids greater than 30 microns. Cartridge filters will then filter out the remaining solids greater than 1 micron. The solution at this point is ready for the reverse osmosis process. To achieve reverse osmotic purification, the pretreated and filtered solution is pressurized and directed to the first step of a two-stage reverse osmosis process. Approximately 60 percent of the total feed volume will be converted to product or purified water in the first stage. The brine water of the first stage will then act as the feed for the second stage, which yields an overall product or purified to brine ratio of 4:1. The brine generated will be further treated and reduced by brine concentration.

The RO unit was sized to operate at a nominal[5] capacity of 580 gallons per minute. This design rate has been utilized by URI at similar ISL facilities with excellent results. Additionally, the sizing is optimal because it will allow concurrent restoration to proceed at approximately the same rate production wellfields are depleted. (I.e. with mining and restoration going on concurrently restoration and mining will proceed at similar rates).

RO treatment operating and maintenance costs are included within the O & M budget in Attachment E-2-1.

2.3. Brine Concentrator Equipment Description

A brine concentrator will be used for final reduction of liquid waste. The RO reject stream will be treated with a vertical tube, falling film vapor compressor evaporator followed by a

[5] RAP-U1's nominal capacity is an estimate. HRI will deal with capacity variances that result from equipment efficiency or downtime by increasing or decreasing the equipment size and possibly adjusting surge capacity. For example, if actual operating results indicate that R.O. equipment downtime is 5% then increasing the equipment design capacity from 580 gpm to 610 gpm would allow the average throughput to remain the same. At this stage it is impossible for HRI to anticipate and adjust for every operational variable that may arise in the future.

steam driven rotary drum dryer to achieve zero liquid discharge (dry solids). The solids will be bulk stored and shipped to an 11.e.2-byproduct facility for disposal.

Brine concentration is a process that can process a waste stream into deionized water and solid slurry. Electrical utilities in the Four Corners area, and paper, and pulp companies have employed this technology for decades to handle their waste streams. The principle behind the process is based on the ideal Carnot cycle where an initial fixed volume of concentrated brine is heated to boiling temperature. The steam vapor created is mechanically compressed; resulting in a secondary steam vapor whose temperature is elevated (15-20 degrees) by the work energy used during compression. Distilled water is condensed from the secondary steam vapor onto internal heat exchangers. The heat loss during condensation is transferred to the circulating brine on the opposite side of the heat exchanger. The brine's temperature is raised, maintaining the internal boiling environment. This source of heat sustains the creation of primary steam used to feed the compressor. The cycle is continuous so long as energy is added at the compressor stage. The electrical power used in compressing, and elevating the temperature of the primary steam vapor produces distilled product water. The resultant hyper-concentrated brine allows solid precipitate in the form of common salts as determined by the solution's limits for solubility. Typically, for each 100 gallons of waste brine treated, 98 gallons of distilled water and 2 gallon of slurry solids are formed.

The BC was sized to accommodate the anticipated brine that the RO will produce.

BC costs are included within the O & M budget in Attachment E-2-1.

2.4. Pore Volumes and Flair

Restoration equipment capacity design coupled with timing of the restoration operations budgeted herein is a function of the quantity of water that will be processed during restoration that is calculated in this RAP by using the pore volume unit of measure. The term "pore volume" (PV) is a term of convenience that has been conceived by the ISL industry to describe the quantity of free water in the pores of a given volume of rock. The units are provided in gallons. PV's provides a unit of reference that a miner can use to describe the amount of circulation that is needed to leach an ore body, or describe the times water must be flowed through a quantity of depleted ore to achieve restoration. PV's provide a way that a miner can take small-scale studies, such as studies in the laboratory, and scale these studies up to field level or to compare pilot scale studies[6] to commercial scale. Hence they provide a miner with an important technique for calculating ISL project economics and restoration costs.

PV's are calculated by determining the three dimensional volume of the rock (that is also the ore zone) and multiplying this number by the percent porosity. HRI used the "ore area" method to determine pore volumes[7], where the extent of ore of given grade within a mine unit is

[6] I.e. such as the Section 9 Pilot. See FEIS p. 4-37.

[7] Different operators have used different methods to determine the volume of the ore zone. For example, some use the "pattern method" where pattern dimensions are used to determine the area of the ore and then the area is multiplied by screen thickness to determine the volume of rock in the five spot. The pore volume of the five spot is

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outlined and digitized to provide the ore area[8]. This area is then multiplied by the average ore thickness to provide the three dimensional volume of the ore that is to be leached. This volume is converted to a PV by multiplying the ore volume by the percent porosity and then converting to the units of measurement (i.e. gallons). Table 1 below shows the PV calculation for the Crownpoint location that was used as the assumption in the budget model.

Table 1 – Crownpoint Pore Volume Calculation

ZONE	Area (ft2)	Tk (ft)	Vol (ft3)	Por	gal/ft3	PV (gal)	H-PIF	V-PIF	CPV (gal)	9 X CPV
SE/4										
UA	168,000	12	2,016,000	0.25	7.48	3,769,920	1.5	1.3	7,351,344	66,162,096
ULA	630,000	9.6	6,048,000	0.25	7.48	11,309,760	1.5	1.3	22,054,032	198,486,288
MLA	260,000	8.6	2,236,000	0.25	7.48	4,181,320	1.5	1.3	8,153,574	73,382,166
ULB	350,000	11.9	4,165,000	0.25	7.48	7,788,550	1.5	1.3	15,187,673	136,689,053
LB	182,000	9.8	1,783,600	0.25	7.48	3,335,332	1.5	1.3	6,503,897	58,535,077
UUC	675,000	7.6	5,130,000	0.25	7.48	9,593,100	1.5	1.3	18,706,545	168,358,905
MC	840,000	12.2	10,248,000	0.25	7.48	19,163,760	1.5	1.3	37,369,332	336,323,988
ULC	992,000	11.8	11,705,600	0.25	7.48	21,889,472	1.5	1.3	42,684,470	384,160,234
LLC	754,000	7.3	5,504,200	0.25	7.48	10,292,854	1.5	1.3	20,071,065	180,639,588
TOTALS	4,851,000		48,836,400			91,324,068			178,081,933	1,602,737,393
SW/4										
LA	308,000	8.8	2,710,400	0.25	7.48	5,068,448	1.5	1.3	9,883,474	88,951,262
ULB	270,000	6.2	1,674,000	0.25	7.48	3,130,380	1.5	1.3	6,104,241	54,938,169
LB	437,000	7.5	3,277,500	0.25	7.48	6,128,925	1.5	1.3	11,951,404	107,562,634
UUC	256,000	6.5	1,664,000	0.25	7.48	3,111,680	1.5	1.3	6,067,776	54,609,984
MC	465,000	12.7	5,905,500	0.25	7.48	11,043,285	1.5	1.3	21,534,406	193,809,652
TOTALS	1,736,000		15,231,400			28,482,718			55,541,300	499,871,701
G. Totals	6,587,000		64,067,800			119,806,786			233,623,233	2,102,609,094

Explanation of Headings:

Area - Area of cut off grade mineralization.
Tk - Thickness of cut off grade mineralization.
Por - Estimated porosity of the rock.
PV - Straight pore volume without any correction.
H-PIF - Horizontal pore volume increase factor.
V-PIF - Vertical pore volume increase factor.
CPV - Corrected pore Volume.

"Flare" factors or pore volume increase factors are multipliers that are commonly used by the ISL industry to account for leach solution outside of the specific boundaries of the calculated ore PV and are generally accepted increases[9] that should be recognized in cost estimates. HRI

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calculated by multiplying the volume of rock by the percent porosity and then converting to the units of measurement (i.e. gallons). The total PV of a mine unit is calculated by adding all the five spot patterns in the mine unit. This method works well for existing ISL operations where the ore had been fully delineated and wellfield installed such as the existing projects in Wyoming.

[8] Future wellfield patterns will be constructed within the ore that is economic at the time. Patterns will be a subset of the overall "ore area".

[9] Flare outside of the ore zone is the norm. In the subsurface water moves in a radial pattern from injector to extractor in its path across the target ore. By choosing patterns carefully flair is minimized. However, as an expected component of ISL mining the flair factors are included in the bonding calculation as a deliberate cost contingency. There is a limit on acceptable flair; the horizontal monitor wells. If fluid is detected in the horizontal monitor wells it is no longer simply flair but then becomes an excursion. An excursion requires immediate corrective action to draw it back to the mine zone or the bonding must be increased above the amount contemplated

uses pore volume increase factors of 1.5 for horizontal and 1.3 for vertical[10]. Horizontal increase is calculated by multiplying the measured or mapped area of the ore, in plan, and multiplying the actual area by 1.5. This yields the affected horizontal area. Likewise, vertical increase is calculated by multiplying the measures average thickness of the ore by 1.3. This yields the affected vertical area. Multiplying the affected horizontal times the affected vertical by porosity provides the affected pore volume for the surety cost estimation. This number is in turn multiplied by 9 to determine water treatment and disposal volumes that are entered into the model to calculate costs. The 1.5 for horizontal and 1.3 for vertical pore volume increase factors have been calculated by URI engineers based on operating experience at other restoration demonstrations and commercial operations and have been adequate for monitoring and reporting restoration progress at other operations. During the Churchrock restoration demonstration that is described in LC 10.28, HRI will use these factors to measure the number of pore volumes that are processed during the restoration demonstration.

The methods utilized in this RAP and all three previous RAP's to calculate pore volume and adjusted pore volumes are consistent with the methods used for the Mobil Section 9 Pilot that was conducted approximately three miles northwest of the Crownpoint site, which in turn were the basis for the NRC evaluation in the FEIS, and are consistent with the methods used by HRI throughout the CUP licensing process, and for HRI's submittals during the Subpart L hearing. HRI methods to calculate pore volume and adjusted pore volumes, and the factors that were used were not generic or arbitrary, but rather were consistently proposed, evaluated, litigated and applied throughout the NRC licensing process and this Subpart L proceeding.

HRI presented the NRC with the Summary Report for the Mobil Section 9 In Situ Leach Pilot[11] as a part of the License Application support materials because the Pilot was a substantial field demonstration, and provided empirical results[12], for the ISL development that is proposed for the CUP. This Report was a compilation of the information from Mobil Oil Company's files and records that were developed when the Pilot was conducted. HRI utilized actual pattern dimensions and the actual number of gallons processed during the restoration to compile the summary report.

The cumulative restoration analyses in Attachment C of the Summary Report show that 59,173,469 gallons were circulated during restoration of the Section 9 Pilot, which equated to 16.7 adjusted pore volumes. It is from this data that NRC determined that after 8 – 10 pore

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in this RAP to compensate for the increase in restoration cost. (See L.C. 10.13 which requires a bond increase if corrective action is not completed in 60 days)

[10] Combined pore volume increase factor is 1.95.

[11] See Pelizza Affidavit January 19, 2001, Attachment 1.

[12] The Section 9 Pilot data provide actual ore zone dimensions and gallons processed so that actual pore volume can be processed. ENDAUM witness Lafferty Testimony May, 23 2001 ¶ 14 specifically recognizes the importance of knowing the quantity of water removed from the formation in calculating pore volumes "…. if the flair factor were increased, the number of pore volumes required should be decreased. This scenario may be true only if the total gallons of impacted groundwater where known." The value of the Section 9 Pilot, or any demonstration, is that it provides *known* variables to the equation that allows pore volume increase factors to be assigned. Given similar mining technology and geology, the pore volume increase factors from a demonstration, such as the Section 9 Pilot, can be applied to an analogous site such as the Crownpoint location.

volumes that TDS concentrations and specific conductance had reached a point where little improvement was realized with additional effort[13] and that the initial surety should be based on 9 pore volumes. Table 2 shows how the adjusted pore volume was calculated using the pattern area, screen thickness, porosity, a horizontal pore volume increase factor of 1.5, and a vertical pore volume increase factor of 1.3. The methods of pore volume analysis utilized in the Summary Report form the foundation of the NRC impact evaluation in Section 4.3.1 of the FEIS which ultimately resulted in the staff determination that 9 pore volumes would be required for surety calculations[14]. It is important that HRI continue to use the previously evaluated pore volume increase factors in the RAP, and in future restoration analyses for the NRC, so that can projected and actual performance and costs can be measured consistently.

Table 2 – Section 9 Pore Volume Calculation

ZONE	Pattern Area (ft2)	Tk (ft)	Vol (ft3)	Por	gal/ft3	PV (gal)	H-PIF	V-PIF	CPV (gal)	Gallons Processed	CPV Processed
Single	40,488	24	971,712	0.25	7.48	1,817,101	1.5	1.3	3,543,347	59,173,469	16.69

Explanation of Headings:

Area - Area of cut off grade mineralization.
Tk - Thickness of cut off grade mineralization.
Por - Estimated porosity of the rock.
PV - Straight pore volume without any correction.
H-PIF - Horizontal pore volume increase factor.
V-PIF - Vertical pore volume increase factor.
CPV - Corrected pore Volume.

HRI has presented similar pore volume estimates during the license application review process. Specifically, in response to NRC Request for Further Information, Question 59, August 15, 1996, pertaining to Ground water Consumption, HRI supplied NRC with a pore volume calculation for the Crownpoint site that was similar to the one presented in the RAP Section 2.a[15][16]. Consistent with the methodology used throughout the Crownpoint Project Licensing process, HRI utilized the ore body outline, not pattern dimensions, to determine the affected surface area and used a horizontal increase factor of 1.5. These were the same values utilized by NRC to conduct the evaluation of water consumption in the FEIS[17]. HRI's proposed pore volume increase factors are consistent with those, which had been systematically evaluated in the FEIS[18]. The FEIS has been found to be adequate for the purpose of licensing the Crownpoint Uranium Project.[19]

In summary, HRI correctly used the same methods to calculate adjusted pore volumes in the RAP cost estimate because they were the same as those that NRC reviewed in HRI submittals,

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[13] See FEIS p. 4-40
[14] See FEIS p. 4-40
[15] Based on professional judgment, HRI increased the estimated porosity from .21 in Q/59 to .25 in the RAP. This resulted in a more conservative estimate in the RAP. All other factors are the same.
[16] See RAI Q1/59.
[17] See FEIS pp. 4-57 through 4-60.
[18] FEIS p. 4-122 used a combined horizontal and vertical pore volume increase factor of 1.95. I.e 1.3 (HDF) x 1.5 (VDF) = 1.95.
[19] See COMMISSION CLI-01-04.

that NRC used in the FEIS impact evaluation, and that was placed into evidence by the HRI in the course of the Subpart L hearing process.

As an additional test for reasonableness of HRI's cost estimate, Table 3 below compares important project variables for PRI's Highland Uranium Project in Wyoming[20] against similar project variables for HRI's Crownpoint project[21]. Table 3 brings into context the comparative size, and corresponding scope of reclamation, of the two projects. In this table the actual surety amount for PRI are shown against the proposed surety amount from this RAP-CP. Reviewing the data in Table 3 in the context of number of wells, throughput, and number of satellite locations, the PRI Highland project exceeds the size of the HRI Crownpoint project. The PRI Highland and HRI Crownpoint wellfield pattern size and duration of operation are comparable. The PRI Highland adjusted pore volume is 20% greater than that estimated by HRI for the Crownpoint site[22]. In the comparative measures of $/acre wellfield, or $/pound produced, PRI proposed surety amount exceeds that of HRI. In the comparative measures of water process cost in $/ m gal., HRI's an PRI's[23] proposed surety amount are essentially the same. The Table 3 information provides strong evidence that the costs estimates for the HRI Crownpoint location are consistent the PRI Highland costs that the Intervenor's experts argue should serve as a reasonable example.

Table 3 – Comparison of Key Project Variables and Reclamation Costs

Project Variables	PRI[24]	HRI Crownpoint
Number of wells (all)	~4141	~1014
Acres of wellfield patterns	~189	~181[25]
Years of operation	13	15
Cumulative production (mm lbs. U_3O_8)	~13	~15
Nominal throughput (gallon per minute)	9000	4000
Number of satellites	3[26]	1
Number of pore volume's used in surety estimate	6	9
Size of adjusted restoration volume (billion gallons)	~2.71	~2.10
Comparative PV size (mm gal.) /acre wellfield	14.3	11.6
Restoration estimate (~mm $)	$21.12	$16.39
Comparative $/acre wellfield	$111,751	$93,370
Comparative $/pound produced	$1.63	$1.09
Comparative process cost $/ m gal.	$7.79	$7.81

[20] See Testimony of April Lafferty, May 23, 2001 ¶ 11.

[21] Mr. Ingle Testimony of December 19, 2000, p. 31 states "there is considerable relevant and analogous uranium ISL restoration experience in Wyoming to draw from to develop credible cost estimates".

[22] As stated in 5 above, it is anticipated that if HRI was to use wellfield patterns rather that ore boundary areas then the pore volume and adjusted pore volumes would be smaller and more proportional to PRI when compared to well field pattern acreage.

[23] Dr. Abitz Testimony dated May 23, 2001 continues to describe reasons to use unit groundwater costs from the Fernald site. It is more appropriate to use a similar NRC licensed ISL facility.

[24] Actual from information provided by PRI staff.

[25] Estimated from COP 2.0, Figure 1.4-3.

[26] PRI costs include the D & D of the also include the mother plant. HRI mother plant D & D costs are included in the Churchrock Section 8 RAP.

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2.6. Ground Water Quality

Once the economic recovery limit of a mine area is reached, lixiviant injection is stopped, and the affected ground water is treated (restored) to return the quality of water to regulatory standards. Water quality will be reclaimed to the criteria of L.C. 10.21. The limited water quality data from the Crownpoint site suggests that the water good and meets drinking water quality standards for all parameters except uranium related radionuclides.[27]. The Unit 1 site monitor well data[28] from the same ore zone aquifer 2 to 3 miles to the west of the Crownpoint location is more extensive, and provides a good picture of radionuclide concentrations in water that is interstitial to roll front uranium mineralization. A thorough characterization of the premine groundwater will be conducted at the Crownpoint location as required by L.C.'s 10.21 & 10.22 and it will be this characterization that provides the baseline against which restoration will be measured.

LC 9.14 States: "Prior to injection of lixiviant, the licensee shall obtain all necessary permits and licenses from the appropriate regulatory authorities". At the Crownpoint location this provision requires that HRI acquire an Underground Injection Control Permit and an Aquifer Exemption[29] through the USEPA. Aquifer Exemption is a regulatory devise of the USEPA that is used to designate aquifers or portions of aquifers as "exempt" because they are mineralized and producible of minerals in commercial quantities and are not currently or likely to be in the future sources of drinking water. HRI has not acquired either of these authorizations for the Crownpoint location at this time but will be required to do so by NRC before operations begin.

2.7. Groundwater Restoration Budget Line Item Assumptions

HRI used historic and ongoing company experience with similar ISL uranium recovery and groundwater restoration operations in developing its budget model. For example because URI, HRI's sister company is currently reclaiming two other commercial ISL mines, HRI drew on this experience to aid in sizing labor requirements, maintenance needs and other cost categories that may not be apparent to someone without similar "hands on" experience. Unit labor costs are

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[27] FEIS p. 3-31.

[28] RAP-U1 § 2.6

[29] 40 CFR 146.4 states: "An aquifer or a portion thereof which meets the criteria for an "underground source of drinking water" in § 146.3 may be determined under 40 CFR 144.8 to be an "exempted aquifer" if it meets the following criteria:

(a) It does not currently serve as a source of drinking water; and

(b) It cannot now and will not in the future serve as a source of drinking water because:

(1) It is mineral, hydrocarbon or geothermal energy producing, or can be demonstrated by a permit applicant as part of a permit application for a Class II or III operation to contain minerals or hydrocarbons that considering their quantity and location are expected to be commercially producible.

(2) It is situated at a depth or location which makes recovery of water for drinking water purposes economically or technologically impractical;

(3) It is so contaminated that it would be economically or technologically impractical to render that water fit for human consumption; or

(4) It is located over a Class III well mining area subject to subsidence or catastrophic collapse;..."

the same as what was provided to NRC as part of the license review of the overall project.[30] In addition HRI used actual costs estimates from the region for utilities, and other materials that will be used in reclamation.

The assumptions that were used in the groundwater restoration budget (See Attachment E-2-1) are as follows:

Salaries

For the purpose of the Financial Assurance Plan, HRI assumed employment of technical professionals whose expertise is needed on a limited basis during the restoration mode. Anticipated positions are listed in the Restoration Budget rows 1-15. However, to justify their full time status and utilize their time on the job, it is assumed that they are required to provide a multitude of services, i.e., every employee will be wearing multiple hats. As such, individual job descriptions are difficult. For example, in the restoration mode, a qualified geologist will be required to verify the configuration of restoration patterns to assure efficient results. While this task requires unique geological expertise, the time commitment by the geologist to this task may only be several hours per week. Therefore, to maximize the use of the geologist time, he or she will be assigned to many other tasks for which he or she will be qualified such as lab analyst, well sampler, and plant operator. HRI also plans to maintain several other technical disciplines on staff such as radiation safety specialist, and engineers. In the restoration mode they will also perform their primary function and a number of secondary roles.

Reflecting the very broad nature of each full time employee's job at the CUP during the restoration mode, the following is a summary of each position that is budgeted in the Financial Assurance Plan. Anticipated salaries that were used in the budget are within Attachment E-2-4.

Operations Manager. In Charge of all aspects of day-to-day activities and planning for Crownpoint Uranium Project D & D. Responsible for interface with accounting services including coding and approval of all invoices, monthly cost analysis, restoration report generation, and employee relation responsibilities.

Environmental Manager. Responsible for the radiation health and safety, environmental compliance and quality assurance program at the Crownpoint Uranium Project. Supervise the Radiation Safety Officers to ensure that all radiation safety; environmental compliance and permitting/licensing programs will be conducted in a responsible manner and in compliance with all applicable regulations and permit/license conditions. Serve as Company liaison with regulatory agencies over the term of the restoration activity.

Radiation Safety Officer. Responsible for compliance with all USNRC, and MSHA rules and regulations at the CUP. Also responsible for assistance with laboratory analysis, vehicle safety, reporting and public information.

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[30] See RAI Q1/8 - Feb. 19, 1996.

Chemist. Responsible for maintaining day to day analytical services including operational and environmental. In this capacity the chemist will assure that proper chemical parameters are reported to operations for the water treatment processes. He will be responsible for performing analysis of all routine environmental samples such as monitor wells.

Senior Geologist. Responsible for evaluation of logs and other well data and its interpretation as it pertains to restoration activities. Performs all monitor well sampling duties and when possible, helps with wellfield construction as well as Smeal pump hoist operation. Duties include drafting and ACAD operator for mapping needs. Provides weekend call-out and rotating operator duties as needed.

Wellfield Foreman. Responsible for Wellfield operation and construction as it pertains to restoration. Helps with monitor well sampling and backup pump hoist operator.

Wages-Direct

Electrician. Responsible for performing day to day electrical maintenance and repair services. Performs restoration operator duties on a rotating basis.

Plant Operator. Performs restoration operator duties on a regular basis. This would include the operations of all water treatment equipment including the reverse osmosis unit and brine concentrator.

Truck driver. Provides CDL driver duties. Will serve as backhoe operator and have operator duties on a rotating basis.

Wellfield Operator. Perform wellfield restoration operator duties on a regular basis and rotations with the Plant Operator.

Pump Hoist Operator. Responsible for the running of pumps in and out of the hole as required by restoration activities. Other duties include the operation of the backhoe and labor necessary for field construction.

Insurance-Workman's Compensation

Estimate based on projected compensation expenses and prevailing rates.

Payroll Taxes

Estimate based on projected compensation expenses and prevailing rates.

Medical Insurance

Estimate based on headcount and historic premium rates.

November 19, 2001

401K Contributions

The 401(k) Contribution cost codes represent HRI-funded contributions under the 401(k) – the retirement savings plan for HRI employees. The 401 (k) Contribution portion is made concurrent with each bi-weekly payroll period as a component of each eligible employee's total compensation.

Telephone/Telegraph

Estimated average costs of regular telephone service, cellular telephone service, and fax line service and internet line service at all CUP locations.

Postage/Freight

Estimated average cost of all types of mail service.

Copy Equipment

Estimate average cost for operation of all types of copy and fax equipment at all CUP locations.

Other Equipment & Rental

This covers the rental of equipment and miscellaneous equipment average costs. As applied in these estimates, it would include office machine rental, water machines for potable water, etc.

Office Supplies

Estimated average costs of office supplies such as paper, pens, etc.

Office Equipment Maintenance

Estimate average cost for maintenance for all types of office equipment at all CUP locations.

Data Processing

Estimated average cost for outside data processing.

Maps

Estimated average cost of plotting and reproducing maps for routine operations and reports.

November 19, 2001

Drafting & Printing

Estimated average for outside computer automated drawing services for report preparation.

Transportation - Air & Car

Estimated average for airplane tickets and auto rental.

Meals

Estimated average for travel related meals.

Misc. Travel Expense

Estimated average for travel related expenses such as hotels.

Env-Depreciable Equipment

Replacement equipment and calibration costs. This would include survey and sample equipment and routine calibration and service.

Env-Operational Analyses

This cost code is reserved for outside analysis

Environmental – Miscellaneous

As the name suggests, any environmental related item not specifically addressed in the other codes 090 through 098. Miscellaneous items may include sample bottles, filters, reagents, calibration, etc.

Safety

This is for costs associated with safety supplies for the employees. Items charged to this cost code would include safety boots, safety glasses, potable water, protective gloves, safety goggles etc.

Backhoe

All backhoe rental and maintenance such as oil changes, and repairs would be charged to this account

Misc. Chemicals

The major charge to this cost code during restoration is anti-scalent for the RO.

Utilities - Electric, Wellfield

Calculated electrical cost for operating the pumps and other equipment in the wellfield. The basis for these costs is shown in Attachment E-2-2.

Utilities - Electric, Brine Concentrator

Calculated electrical cost for operating the brine concentrator. The basis for these costs is shown in Attachment E-2-2.

Utilities - Electric, Plant and RO

Calculated electrical cost for operating the plant, reverse osmosis unit, and other office lighting and electrical needs. The basis for these costs is shown in Attachment E-2-2.

Submersible Pumps

Estimated average maintenance and replacement costs for submersible pumps that are used in extraction wells.

Submersible Motors

Estimated average maintenance and replacement costs for submersible pump electric motors that are used in extraction wells.

Field Piping & Valves

Estimated average maintenance and replacement costs for the various fittings, valves, glues etc. that is used in wellfield operations.

Meters

Estimated average maintenance and replacement costs for wellfield meters.

Misc. Field

The major charge to this cost code during restoration is PPE, rags, solvents and other miscellaneous field needs.

Handtools

Estimated average handtool replacement costs

November 19, 2001

Plant Piping & Valves

Estimated average maintenance and replacement costs for the various fittings, valves, glues etc. that is used in plant operations.

Plant Brine Concentrator Inst.

A cost code to charge anticipated brine concentrator instrument replacement.

Pumps

Estimated average maintenance and replacement costs for pumps that are used in the water treatment plant.

Plant Electrical

Estimated average electrical maintenance and replacement costs for water treatment plant operations.

Filters

Estimated average filter and filter media replacement costs and maintenance costs for filtration equipment for water treatment plant operations.

Evaporation Ponds

A cost code to charge anticipated maintenance costs for pond liner repairs and maintenance.

Roads

A cost code to charge anticipated maintenance costs for road maintenance.

Gas, Oil, and Grease

Equipment fuel costs and lubrication.

Disposal - BC Solids

Ongoing operational cost of disposing salt residue from brine concentrator. The basis for these costs is shown in Attachment E-2-2.

RO Unit

A cost code to charge anticipated reverse osmosis unit repair, maintenance and instrument replacement.

Lab Supplies

Estimated average costs of analytical laboratory supplies such as reagents, filters, glassware, etc.

RO Membrane

Average replacement costs of reverse osmosis unit membranes.

Field Equip. Repairs & Maint.

A cost code to charge anticipated maintenance costs for large field equipment such as the pump host equipment, generators, and trucks.

Vehicle Repairs & Maint.

A cost code to charge anticipated maintenance costs for road vehicles such as pick up trucks and company autos.

Vehicles – Pickups

The estimated average cost for the major repair of a company pickup truck.

Vehicles - Tractors & Trucks

The estimated average cost for the major repair of a large trucks or trailers.

Vehicles - Automobiles

The estimated average cost for the major repair of a company car.

Minus contingency/profit, the total cost for groundwater restoration and post restoration management is projected to be $10,890,592.

November 19, 2001

ATTACHMENT E-2-1
GROUNDWATER RESTORATION BUDGET

CROWNPOINT SEC, 24 GROUNDWATER RESTORATION AND DECOMMISSIONING COSTS

November 16, 2001

COSTS ASSOCIATED WITH RO AND BRINE CONCENTRATION OPERATION AND MAINTENANCE

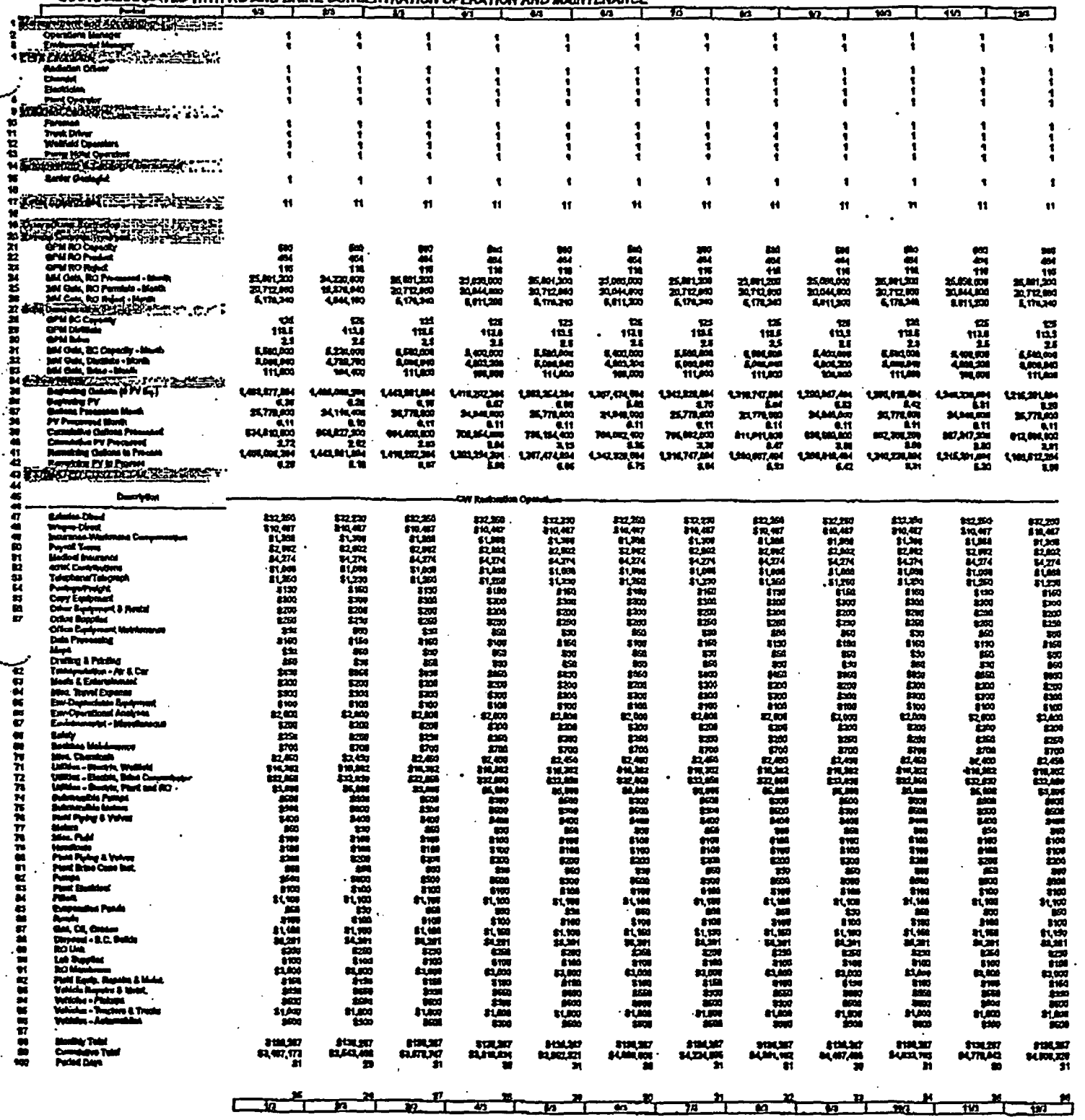
	Period	1/1	2/1	3/1	4/1	5/1	6/1	7/1	8/1	9/1	10/1	11/1	12/1
1	Management and Administration												
2	Operations Manager	1	1	1	1	1	1	1	1	1	1	1	1
3	Environmental Manager	1	1	1	1	1	1	1	1	1	1	1	1
4	[illegible]												
	Radiation Officer	1	1	1	1	1	1	1	1	1	1	1	1
	Chemist	1	1	1	1	1	1	1	1	1	1	1	1
	Electrician	1	1	1	1	1	1	1	1	1	1	1	1
	Plant Operator	1	1	1	1	1	1	1	1	1	1	1	1
9	[illegible]												
10	Foreman	1	1	1	1	1	1	1	1	1	1	1	1
11	Truck Driver	1	1	1	1	1	1	1	1	1	1	1	1
12	Wellfield Operator	1	1	1	1	1	1	1	1	1	1	1	1
13	Pump Hoist Operator	1	1	1	1	1	1	1	1	1	1	1	1
14	Engineering & Geologic Personnel												
15	Senior Geologist	1	1	1	1	1	1	1	1	1	1	1	1
16													
17	Total Employees	11	11	11	11	11	11	11	11	11	11	11	11
18													
19	[illegible]												
20	[illegible]												
21	GPM RO Capacity	580	580	580	580	580	580	580	580	580	580	580	580
22	GPM RO Product	464	464	464	464	464	464	464	464	464	464	464	464
23	GPM RO Reject	116	116	116	116	116	116	116	116	116	116	116	116
24	MM Gals, RO Processed - Month	25,891,200	24,220,800	25,891,200	25,056,000	25,891,200	25,056,000	25,891,200	25,891,200	25,056,000	25,891,200	25,056,000	25,891,200
25	MM Gals, RO Permeate - Month	20,712,960	19,376,640	20,712,960	20,044,800	20,712,960	20,044,800	20,712,960	20,712,960	20,044,800	20,712,960	20,044,800	20,712,960
26	MM Gals, RO Reject - Month	5,178,240	4,844,160	5,178,240	5,011,200	5,178,240	5,011,200	5,178,240	5,178,240	5,011,200	5,178,240	5,011,200	5,178,240
27	[illegible]												
28	GPM BC Capacity	125	125	125	125	125	125	125	125	125	125	125	125
29	GPM Distillate	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5
30	GPM Brine	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
31	MM Gals, BC Capacity - Month	5,580,000	5,220,000	5,580,000	5,400,000	5,580,000	5,400,000	5,580,000	5,580,000	5,400,000	5,580,000	5,400,000	5,580,000
32	MM Gals, Distillate - Month	5,066,640	4,739,760	5,066,640	4,903,200	5,066,640	4,903,200	5,066,640	5,066,640	4,903,200	5,066,640	4,903,200	5,066,640
33	MM Gals, Brine - Month	111,600	104,400	111,600	108,000	111,600	108,000	111,600	111,600	108,000	111,600	108,000	111,600
34	[illegible]												
35	Beginning Gallons (8 PV Ea.)	2,102,604,094	2,078,828,494	2,052,712,094	2,026,933,494	2,001,985,494	1,976,208,894	1,951,357,894	1,925,478,294	1,900,800,894	1,874,760,894	1,848,971,894	1,824,023,094
36	Beginning PV	9	8.88	8.77	8.66	8.57	8.46	8.35	8.24	8.13	8.02	7.91	7.81
37	Gallons Processed Month	25,776,000	24,114,000	25,776,000	24,948,000	25,776,000	24,948,000	25,776,000	25,776,000	24,948,000	25,776,000	24,948,000	25,776,000
38	PV Processed Month	0.11	0.10	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11
39	Cumulative Gallons Processed	25,776,000	49,890,000	75,676,000	100,622,000	126,403,200	151,361,200	177,130,000	202,910,400	227,858,400	253,634,000	278,580,000	304,365,600
40	Cumulative PV Processed	0.11	0.21	0.32	0.43	0.54	0.65	0.76	0.87	0.98	1.08	1.19	1.30
41	Remaining Gallons to Process	2,076,828,494	2,052,712,094	2,026,933,494	2,001,985,494	1,976,208,894	1,951,257,894	1,925,478,294	1,900,800,894	1,874,760,894	1,848,971,894	1,824,023,094	1,798,243,494
42	Remaining PV to Process	8.88	8.79	8.66	8.57	8.46	8.35	8.24	8.13	8.02	7.91	7.81	7.70
43	[illegible]												
44													
45	Description	GW Restoration Operations											GW Restoration Operations
46													
47	Salaries-Direct	$32,350	$32,350	$32,350	$32,350	$32,350	$32,350	$32,350	$32,350	$32,350	$32,350	$32,350	$32,350
48	Wages-Direct	$10,487	$10,487	$10,487	$10,487	$10,487	$10,487	$10,487	$10,487	$10,487	$10,487	$10,487	$10,487
49	Insurance-Workmans Compensation	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306
50	Payroll Taxes	$2,982	$2,982	$2,982	$2,982	$2,982	$2,982	$2,982	$2,982	$2,982	$2,982	$2,982	$2,982
51	Medical Insurance	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274
52	401K Contributions	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068
53	Telephone/Telegraph	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250
54	Postage/Freight	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
55	Copy Equipment	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
56	Other Equipment & Rental	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
57	Office Supplies	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
	Office Equipment Maintenance	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
	Data Processing	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
	Maps	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
	Drafting & Printing	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
62	Transportation - Air & Car	$650	$650	$650	$650	$650	$650	$650	$650	$650	$650	$650	$650
63	Meals & Entertainment	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
64	Misc. Travel Expense	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
65	Non-Depreciable Equipment	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
66	Env-Operational Analyses	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800
67	Environmental - Miscellaneous	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
68	Safety	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
69	Building Maintenance	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700
70	Misc. Chemicals	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450
71	Utilities - Electric, Wellfield	$16,302	$16,302	$16,302	$16,302	$16,302	$16,302	$16,302	$16,302	$16,302	$16,302	$16,302	$16,302
72	Utilities - Electric, Brine Concentrator	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850
73	Utilities - Electric, Plant and RO	$5,806	$5,806	$5,806	$5,806	$5,806	$5,806	$5,806	$5,806	$5,806	$5,806	$5,806	$5,806
74	Submersible Pumps	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600
75	Submersible Motors	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
76	Field Piping & Valves	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400
77	Meters	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
78	Misc. Field	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
79	Handtools	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
80	Plant Piping & Valves	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
81	Plant Brine Conc Inst.	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
82	Pumps	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
83	Plant Electrical	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
84	Filters	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100
85	Evaporation Ponds	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
86	Roads	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
87	Gas, Oil, Grease	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150
88	Disposal - B.C. Solids	$8,391	$8,391	$8,391	$8,391	$8,391	$8,391	$8,391	$8,391	$8,391	$8,391	$8,391	$8,391
89	RO Unit	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
90	Lab Supplies	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
91	RO Membranes	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000
92	Field Equip. Repairs & Maint.	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
93	Vehicle Repairs & Maint.	$650	$650	$650	$650	$650	$650	$650	$650	$650	$650	$650	$650
94	Vehicles - Pickups	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
95	Vehicles - Tractors & Trucks	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000
96	Vehicles - Automobiles	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
97													
98	Monthly Total	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367
99	Cumulative Total	$136,367	$272,734	$409,101	$545,468	$681,835	$817,722	$954,569	$1,090,936	$1,227,303	$1,363,670	$1,500,037	$1,636,404
100	Period Days	31	29	31	30	31	30	31	31	30	31	30	31

CROWNPOINT SEC, 24 GROUNDWATER RESTORATION AND DECOMMISSIONING COSTS
COSTS ASSOCIATED WITH RO AND BRINE CONCENTRATION OPERATION AND MAINTENANCE

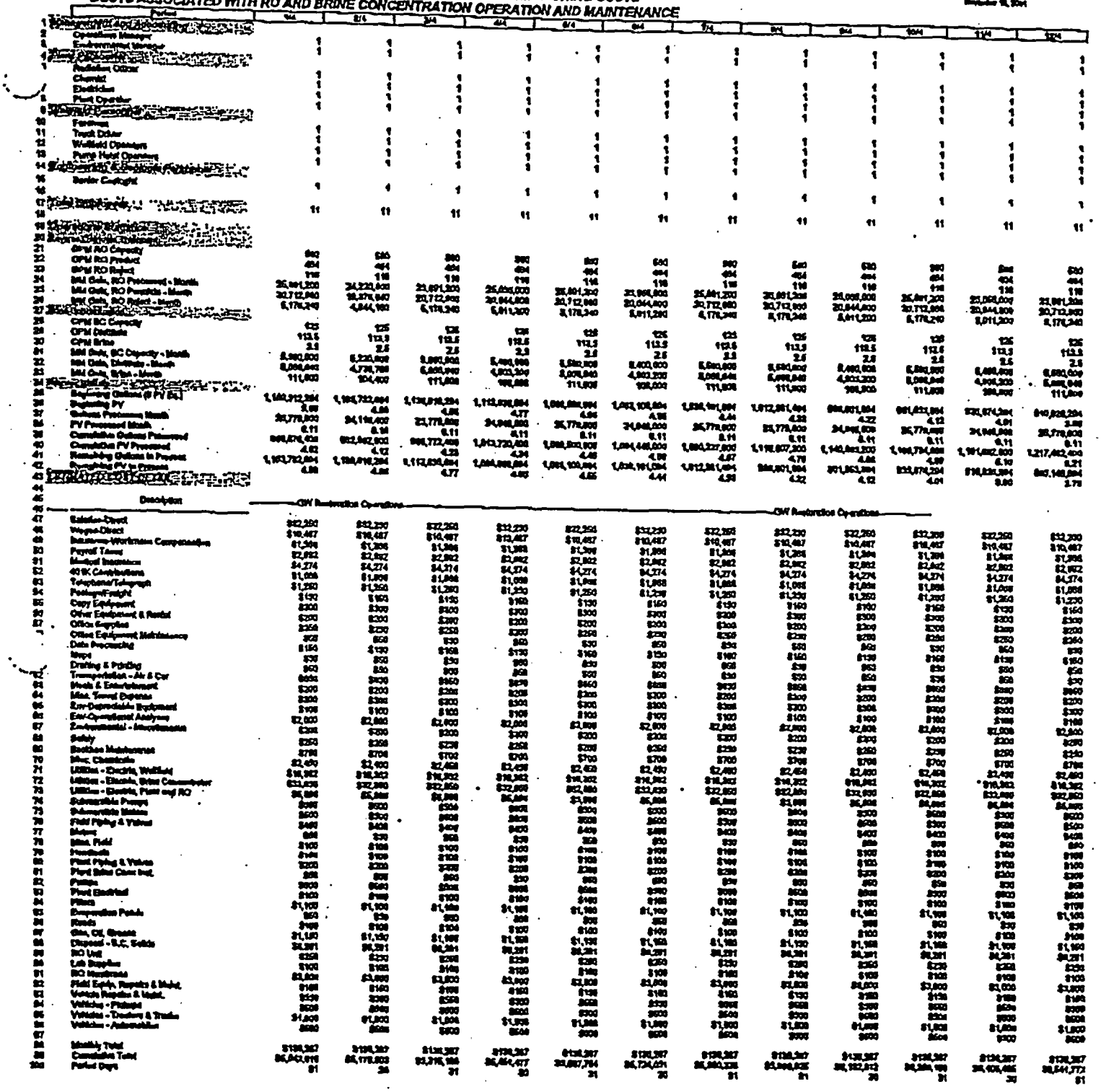
[illegible] 18, 2001

	Period	1/2	2/2	3/2	4/2	5/2	6/2	7/2	8/2	9/2	10/2	11/2	12/2
1	[illegible]												
2	Operations Manager	1	1	1	1	1	1	1	1	1	1	1	1
3	Environmental Manager	1	1	1	1	1	1	1	1	1	1	1	1
	[illegible]												
	Radiation Officer	1	1	1	1	1	1	1	1	1	1	1	1
	Chemist	1	1	1	1	1	1	1	1	1	1	1	1
7	Electrician	1	1	1	1	1	1	1	1	1	1	1	1
8	Plant Operator	1	1	1	1	1	1	1	1	1	1	1	1
9	[illegible]												
10	Foreman	1	1	1	1	1	1	1	1	1	1	1	1
11	Truck Driver	1	1	1	1	1	1	1	1	1	1	1	1
12	Wellfield Operators	1	1	1	1	1	1	1	1	1	1	1	1
13	Pump Hand Operators	1	1	1	1	1	1	1	1	1	1	1	1
14	[illegible]												
15	Senior Geologist	1	1	1	1	1	1	1	1	1	1	1	1
16													
17	[illegible]	11	11	11	11	11	11	11	11	11	11	11	11
18													
19	[illegible]												
20	[illegible]												
21	GPM RO Capacity	580	580	580	580	580	580	580	580	580	580	580	580
22	GPM RO Product	464	464	464	464	464	464	464	464	464	464	464	464
23	GPM RO Reject	116	116	116	116	116	116	116	116	116	116	116	116
24	MM Gals, RO Processed - Month	25,891,200	24,220,800	25,891,200	25,056,000	25,891,200	25,056,000	25,891,200	25,891,200	25,056,000	25,891,200	25,056,000	25,891,200
25	MM Gals, RO Permeate - Month	20,712,960	19,376,640	20,712,960	20,044,800	20,712,960	20,044,800	20,712,960	20,712,960	20,044,800	20,712,960	20,044,800	20,712,960
26	MM Gals, RO Reject - Month	5,178,240	4,844,160	5,178,240	5,011,200	5,178,240	5,011,200	5,178,240	5,178,240	5,011,200	5,178,240	5,011,200	5,178,240
27	[illegible]												
28	GPM BC Capacity	126	125	126	126	125	126	126	125	125	125	125	126
29	GPM Distillate	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5
30	GPM Brine	2.5	2.6	2.6	2.6	2.6	2.5	2.5	2.5	2.5	2.5	2.5	2.5
31	MM Gals, BC Capacity - Month	5,580,000	5,220,000	5,580,000	5,400,000	5,580,000	5,400,000	5,580,000	5,580,000	5,400,000	5,580,000	5,400,000	5,580,000
32	MM Gals, Distillate - Month	5,066,640	4,739,760	5,066,640	4,903,200	5,066,640	4,903,200	5,066,640	5,066,640	4,903,200	5,066,640	4,903,200	5,066,640
33	MM Gals, Brine - Month	111,600	104,400	111,600	108,000	111,600	108,000	111,600	111,600	108,000	111,600	108,000	111,600
34	[illegible]												
35	Beginning Gallons (# PV Eq.)	1,798,243,404	1,772,463,804	1,748,347,404	1,722,567,804	1,697,618,804	1,671,840,204	1,646,892,204	1,621,112,604	1,595,333,004	1,570,385,004	1,544,605,404	1,519,657,404
36	Beginning PV	7.70	7.59	7.48	7.37	7.27	7.16	7.05	6.94	6.83	6.72	6.61	6.50
37	Gallons Processed Month	25,779,600	24,116,400	25,779,600	24,948,000	25,779,600	24,948,000	25,779,600	25,779,600	24,948,000	25,779,600	24,948,000	25,779,600
38	PV Processed Month	0.11	0.10	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11
39	Cumulative Gallons Processed	330,145,200	354,261,600	380,041,200	404,989,200	430,768,800	455,716,800	481,496,400	507,276,000	532,224,000	558,003,600	582,951,600	608,731,200
40	Cumulative PV Processed	1.41	1.52	1.63	1.73	1.84	1.95	2.06	2.17	2.28	2.39	2.50	2.61
41	Remaining Gallons to Process	1,772,463,804	1,748,347,404	1,722,567,804	1,697,619,804	1,671,840,204	1,646,892,204	1,621,112,604	1,595,333,004	1,570,385,004	1,544,605,404	1,519,657,404	1,493,877,804
42	Remaining PV to Process	7.59	7.48	7.37	7.27	7.16	7.05	6.94	6.83	6.72	6.61	6.50	6.39
43	[illegible]												
44													
45	Description	GW Restoration Operations											
46													
47	Salaries-Direct	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250
48	Wages-Direct	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467
49	Insurance-Workmans Compensation	$1,309	$1,309	$1,309	$1,309	$1,309	$1,309	$1,309	$1,309	$1,309	$1,309	$1,309	$1,309
50	Payroll Taxes	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802
51	Medical Insurance	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274
52	401K Contributions	$1,006	$1,006	$1,006	$1,006	$1,006	$1,006	$1,006	$1,006	$1,006	$1,006	$1,006	$1,006
53	Telephone/Telegraph	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250
54	Postage/Freight	$150	$150	$150	$150	$150	$150	$150	$100	$150	$100	$150	$100
55	Copy Equipment	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
56	Other Equipment & Rental	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
	Office Supplies	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
	Office Equipment Maintenance	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
	Data Processing	$100	$130	$130	$130	$130	$130	$130	$130	$130	$130	$130	$130
	Maps	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
61	Drafting & Printing	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30
62	Transportation - Air & Car	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850
63	Meals & Entertainment	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
64	Misc. Travel Expense	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
65	Env-Expendable Equipment	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
66	Env-Operational Analyses	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000
67	Environmental - Miscellaneous	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
68	Safety	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
69	Building Maintenance	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700
70	Misc. Chemicals	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450
71	Utilities - Electric, Wellfield	$18,382	$18,382	$18,382	$18,382	$18,382	$18,382	$18,382	$18,382	$18,382	$18,382	$18,382	$18,382
72	Utilities - Electric, Brine Concentrator	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850
73	Utilities - Electric, Plant and RO	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000
74	Submersible Pumps	$600	$600	$600	$600	$600	$600	$300	$300	$300	$300	$300	$600
75	Submersible Motors	$300	$300	$300	$300	$300	$600	$600	$600	$600	$600	$600	$300
76	Field Piping & Valves	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400
77	Meters	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
78	Misc. Field	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
79	Handtools	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
80	Plant Piping & Valves	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
81	Plant Brine Conc Inst.	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
82	Pumps	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
83	Plant Electrical	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
84	Filters	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100
85	Evaporation Ponds	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30
86	Roads	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
87	Gas, Oil, Grease	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150
88	Disposal - B.C. Solids	$4,291	$4,291	$8,291	$8,291	$4,291	$4,291	$4,291	$8,291	$8,291	$8,291	$8,291	$8,291
89	RO Unit	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
90	Lab Supplies	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
91	RO Membrane	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000
92	Field Equip. Repairs & Maint.	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
93	Vehicle Repairs & Maint.	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550
94	Vehicles - Pickups	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
95	Vehicles - Tractors & Trucks	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000
96	Vehicles - Automotive	$800	$800	$800	$800	$800	$800	$800	$800	$800	$800	$800	$800
97													
98	Monthly Total	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367	$136,367
99	Cumulative Total	$1,771,730	$1,908,017	$2,044,404	$2,180,801	$2,316,878	$2,453,165	$2,589,482	$2,725,739	$2,862,026	$2,998,312	$3,134,889	$3,270,9[illegible]
100	Period Days	31	28	31	30	31	30	31	31	30	31	30	3[illegible]

CROWNPOINT SEC, 24 GROUNDWATER RESTORATION AND DECOMMISSIONING COSTS
COSTS ASSOCIATED WITH RO AND BRINE CONCENTRATION OPERATION AND MAINTENANCE



CROWNPOINT SEC. 24 GROUNDWATER RESTORATION AND DECOMMISSIONING COSTS
COSTS ASSOCIATED WITH RO AND BRINE CONCENTRATION OPERATION AND MAINTENANCE



CROWNPOINT SEC. 24 GROUNDWATER RESTORATION AND DECOMMISSIONING COSTS
COSTS ASSOCIATED WITH RO AND BRINE CONCENTRATION OPERATION AND MAINTENANCE

November 18, 2001

	Period	1/1	2/1	3/1	4/1	5/1	6/1	7/1	8/1	9/1	10/1	11/1	12/1
1	[illegible]												
2	Operations Manager	1	1	1	1	1	1	1	1	1	1	1	1
3	Environmental Manager	1	1	1	1	1	1	1	1	1	1	1	1
4	[illegible]												
5	Radiation Officer	1	1	1	1	1	1	1	1	1	1	1	1
6	Chemist	1	1	1	1	1	1	1	1	1	1	1	1
7	Electrician	1	1	1	1	1	1	1	1	1	1	1	1
8	Plant Operator	1	1	1	1	1	1	1	1	1	1	1	1
9	[illegible]												
10	Foreman	1	1	1	1	1	1	1	1	1	1	1	1
11	Truck Driver	1	1	1	1	1	1	1	1	1	1	1	1
12	Wellfield Operators	1	1	1	1	1	1	1	1	1	1	1	1
13	Pump Hoist Operators	1	1	1	1	1	1	1	1	1	1	1	1
14	[illegible]												
15	Senior Geologist	1	1	1	1	1	1	1	1	1	1	1	1
16													
17	[illegible]	11	11	11	11	11	11	11	11	11	11	11	11
18													
19	[illegible]												
20	[illegible]												
21	GPM RO Capacity	580	580	580	580	580	580	580	580	580	580	580	580
22	GPM RO Product	464	464	464	464	464	464	464	464	464	464	464	464
23	GPM RO Reject	116	116	116	116	116	116	116	116	116	116	116	116
24	MM Gals, RO Processed - Month	25,891,200	24,220,800	25,891,200	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000
25	MM Gals, RO Permeate - Month	20,712,960	19,376,640	20,712,960	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800
26	MM Gals, RO Reject - Month	5,178,240	4,844,160	5,178,240	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200
27	[illegible]												
28	GPM BC Capacity	125	125	125	125	125	125	125	125	125	125	125	125
29	GPM Distillate	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5
30	GPM Brine	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
31	MM Gals, BC Capacity - Month	5,580,000	5,220,000	5,580,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000
32	MM Gals, Distillate - Month	5,066,640	4,739,760	5,066,640	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200
33	MM Gals, Brine - Month	111,600	104,400	111,600	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000
34	[illegible]												
35	Beginning Gallons (# PV Eq.)	885,146,684	859,367,084	835,250,684	809,471,084	784,523,084	759,575,084	734,627,084	709,679,084	684,731,084	659,783,084	634,835,084	609,887,084
36	Beginning PV	3.78	3.68	3.58	3.46	3.36	3.26	3.14	3.04	2.93	2.82	2.72	2.61
37	Gallons Processed Month	25,779,600	24,116,400	25,779,600	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000
38	PV Processed Month	0.11	0.10	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11
39	Cumulative Gallons Processed	1,343,242,000	1,367,358,400	1,393,138,000	1,418,086,000	1,443,034,000	1,467,982,000	1,492,930,000	1,517,878,000	1,542,826,000	1,567,774,000	1,592,722,000	1,617,670,000
40	Cumulative PV Processed	5.32	5.42	5.54	5.64	5.75	5.86	5.96	6.07	6.18	6.28	6.39	6.50
41	Remaining Gallons to Process	859,367,084	835,250,684	809,471,084	784,523,084	759,575,084	734,627,084	709,679,084	684,731,084	659,783,084	634,835,084	609,887,084	584,939,084
42	Remaining PV to Process	3.68	3.56	3.45	3.35	3.25	3.14	3.04	2.93	2.82	2.72	2.61	2.50
43	[illegible]												
44													
45	Description	GW Restoration Operations											
46													
47	Salaries-Direct	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250	$32,250
48	Wages-Direct	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467	$10,467
49	Insurance-Workmans Compensation	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306	$1,306
50	Payroll Taxes	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802	$2,802
51	Medical Insurance	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274	$4,274
52	401K Contributions	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068	$1,068
53	Telephone/Telegraph	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250
54	Postage/Freight	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
55	Copy Equipment	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
56	Other Equipment & Rental	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
57	Office Supplies	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
58	Office Equipment Maintenance	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
59	Data Processing	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
60	Maps	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
61	Drafting & Printing	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30
62	Transportation - Air & Car	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850
63	Meals & Entertainment	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
64	Misc. Travel Expense	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
65	Non-Depreciable Equipment	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
66	Env-Operational Analyses	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000
67	Environmental - Miscellaneous	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
68	Safety	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
69	Facilities Maintenance	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700
70	Misc. Chemicals	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450
71	Utilities - Electric, Wellfield	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362
72	Utilities - Electric, Brine Concentrator	$32,650	$32,650	$32,650	$32,650	$32,650	$32,650	$32,650	$32,650	$32,650	$32,650	$32,650	$32,650
73	Utilities - Electric, Plant and RO	$5,896	$5,896	$5,896	$5,896	$5,896	$5,896	$5,896	$5,896	$5,896	$5,896	$5,896	$5,896
74	Submersible Pumps	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
75	Submersible Motors	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600
76	Field Piping & Valves	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400
77	Meters	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
78	Misc. Field	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
79	Headends	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
80	Plant Piping & Valves	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
81	Plant Brine Conc Inst.	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
82	Pumps	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
83	Plant Electrical	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
84	Filters	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100
85	Evaporation Ponds	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
86	Resin	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
87	Gas, Oil, Grease	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150	$1,150
88	Disposal - B.C. Solids	$8,281	$8,281	$8,281	$8,281	$8,281	$8,281	$8,281	$8,281	$8,281	$8,281	$8,281	$8,281
89	RO Unit	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
90	Lab Supplies	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
91	RO Membranes	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000
92	Field Equip. Repairs & Maint.	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
93	Vehicle Repairs & Maint.	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550
94	Vehicles - Pickups	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
95	Vehicles - Tractors & Trucks	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000
96	Vehicles - Automobiles	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600
97													
98	Monthly Total	$136,387	$136,387	$136,387	$136,387	$136,387	$136,387	$136,387	$136,387	$136,387	$136,387	$136,387	$136,387
99	Cumulative Total	$6,678,058	$6,814,846	$6,950,843	$7,086,320	$7,223,307	$7,360,494	$7,495,781	$7,632,868	$7,769,365	$7,904,842	$8,040,828	$8,177,216
100	Period Days	31	29	31	30	30	30	30	30	30	30	30	30

November 10, 2004

CROWNPOINT SEC, 24 GROUNDWATER RESTORATION AND DECOMMISSIONING COSTS
COSTS ASSOCIATED WITH RO AND BRINE CONCENTRATION OPERATION AND MAINTENANCE

#	Period	1/1	2/1	3/1	4/1	5/1	6/1	7/1	8/1	9/1	10/1	11/1	12/1
1	[illegible]												
2	Operations Manager	1	1										
3	Environmental Manager	1	1										
	[illegible]												
	Radiation Officer	1	1										
	Chemist	1	1										
	Electrician	1	1										
8	Plant Operator	1	1										
9	[illegible]												
10	Foreman	1	1										
11	Truck Driver	1	1										
12	Wellfield Operators	1	1										
13	Pump Hoist Operators	1	1										
14	[illegible]												
15	Senior Geologist	1	1										
16													
17	[illegible]	11	11										
18													
19	[illegible]												
20	[illegible]												
21	GPM RO Capacity	580	580	580	580	580	580	580	580	580	580	580	580
22	GPM RO Product	464	464	464	464	464	464	464	464	464	464	464	464
23	GPM RO Reject	116	116	116	116	116	116	116	116	116	116	116	116
24	MM Gals, RO Processed - Month	23,387,000	25,058,000	25,891,200	25,058,000	25,891,200	25,891,200	25,891,200	25,058,000	25,891,200	25,058,000	25,891,200	25,891,200
25	MM Gals, RO Permeate - Month	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800
26	MM Gals, RO Reject - Month	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200
27	[illegible]												
28	GPM BC Capacity	125	125	125	125	125	125	125	125	125	125	125	125
29	GPM Distillate	112.5	112.5	112.5	112.5	112.5	112.5	112.5	112.5	112.5	112.5	112.5	112.5
30	GPM Brine	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
31	MM Gals, BC Capacity - Month	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000
32	MM Gals, Distillate - Month	4,860,200	4,860,200	4,860,200	4,860,200	4,860,200	4,860,200	4,860,200	4,860,200	4,860,200	4,860,200	4,860,200	4,860,200
33	MM Gals, Brine - Month	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000
34	[illegible]												
35	Beginning Gallons (# PV Sq.)	684,838,084	658,801,084	635,043,084	610,095,084	485,147,084	460,199,084	435,251,084	410,303,084	385,355,084	360,407,084	335,459,084	310,511,084
36	Beginning PV	2.56	2.45	2.36	2.18	2.08	1.97	1.86	1.76	1.65	1.54	1.44	1.33
37	Gallons Processed Month	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000
38	PV Processed Month	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11
39	Cumulative Gallons Processed	1,542,816,000	1,567,888,000	1,592,814,000	1,617,462,000	1,642,410,000	1,667,358,000	1,692,306,000	1,717,254,000	1,742,202,000	1,767,150,000	1,792,098,000	1,817,046,000
40	Cumulative PV Processed	6.60	6.71	6.82	6.92	7.08	7.14	7.24	7.35	7.45	7.56	7.67	7.78
41	Remaining Gallons to Process	658,901,084	635,043,084	610,095,084	485,147,084	460,199,084	435,251,084	410,303,084	385,355,084	360,407,084	335,459,084	310,511,084	285,563,084
42	Remaining PV to Process	2.40	2.29	2.18	2.08	1.97	1.86	1.76	1.65	1.54	1.44	1.33	1.22
43	[illegible]												
44													
45	Description	GW Restoration Operations										GW Restoration Oper	
46													
47	Salaries-Direct	$32,256	$32,250	$8,750	$8,750	$8,750	$8,760	$8,760	$8,760	$8,750	$8,760	$8,760	$8,750
48	Wages-Direct	$10,467	$10,467	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
49	Insurance-Workmans Compensation	$1,388	$1,388	$280	$280	$280	$280	$280	$280	$280	$280	$280	$280
50	Payroll Taxes	$2,882	$2,882	$613	$613	$613	$613	$618	$613	$618	$618	$613	$618
51	Medical Insurance	$4,274	$4,274	$875	$875	$875	$875	$875	$875	$875	$875	$875	$875
52	401K Contributions	$1,008	$1,008	$218	$218	$218	$218	$218	$218	$218	$218	$218	$218
53	Telephone/Telegraph	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250
54	Postage/Freight	$150	$150	$160	$158	$160	$160	$160	$158	$163	$160	$160	$160
55	Copy Equipment	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
56	Other Equipment & Rental	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
57	Office Supplies	$250	$250	$250	$250	$250	$250	$250	$258	$250	$250	$250	$260
58	Office Equipment Maintenance	$50	$50	$50	$50	$50	$50	$60	$50	$50	$60	$50	$50
59	Data Processing	$150	$150	$150	$150	$150	$150	$130	$130	$150	$150	$150	$150
60	Maps	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
61	Drafting & Printing	$50	$50	$50	$50	$50	$50	$30	$30	$30	$30	$30	$53
62	Transportation - Air & Car	$830	$830	$830	$830	$830	$850	$850	$850	$850	$852	$850	$850
63	Meals & Entertainment	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
64	Misc. Travel Expense	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
65	Ex-Depreciable Equipment	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
66	Env-Operational Analyses	$2,000	$2,000	$2,000	$2,000	$2,000	$2,000	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800
67	Environmental - Miscellaneous	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
68	Safety	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
69	Backhoe Maintenance	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700
70	Misc. Chemicals	$2,400	$2,400	$2,400	$2,400	$2,450	$2,400	$2,450	$2,450	$2,450	$2,400	$2,400	$2,400
71	Utilities - Electric, Wellfield	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362	$16,362
72	Utilities - Electric, Brine Concentrator	$32,800	$32,800	$32,800	$32,800	$32,800	$32,800	$32,800	$32,800	$32,800	$32,800	$32,800	$32,800
73	Utilities - Electric, Plant and RO	$5,886	$6,886	$6,886	$6,886	$6,886	$6,886	$5,886	$5,886	$5,886	$6,886	$6,886	$6,886
74	Submersible Pumps	$500	$300	$300	$300	$300	$300	$500	$300	$500	$300	$300	$300
75	Submersible Motors	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600
76	Field Piping & Valves	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400
77	Meters	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
78	Misc. Field	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
79	Handtools	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
80	Plant Piping & Valves	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$204
81	Plant Brine Conc Inst.	$50	$50	$50	$50	$50	$50	$30	$30	$30	$58	$58	$50
82	Pumps	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
83	Plant Electrical	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
84	Filters	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100
85	Evaporation Ponds	$36	$30	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
86	Roads	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
87	Gas, Oil, Grease	$1,130	$1,130	$1,160	$1,160	$1,160	$1,160	$1,160	$1,160	$1,100	$1,100	$1,100	$1,130
88	Disposal - B.C. Solids	$8,281	$8,281	$8,281	$8,291	$8,291	$8,291	$8,291	$8,291	$8,391	$8,281	$8,281	$8,281
89	RO Unit	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
90	Lab Supplies	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
91	RO Membrane	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$6,000	$3,000	$3,000	$3,000	$3,000	$3,000
92	Field Equip. Repairs & Maint.	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
93	Vehicle Repairs & Maint.	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550	$550
94	Vehicles - Pickups	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600	$600
95	Vehicles - Tractors & Trucks	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000
96	Vehicles - Automobiles	$500	$500	$500	$500	$500	$500	$500	$600	$600	$600	$600	$600
97													
98	Monthly Total	$136,387	$136,387	$94,985	$94,985	$94,985	$94,985	$94,985	$94,985	$94,985	$94,985	$94,985	$94,985
99	Cumulative Total	$8,313,402	$8,449,788	$8,544,374	$8,639,359	$8,733,944	$8,828,129	$8,922,714	$9,017,298	$9,111,883	$9,206,468	$9,301,053	$9,395,638
100	Period Days	31	28	31	30	31	30	31	31	30	31	30	31

CROWNPOINT SEC, 24 GROUNDWATER RESTORATION AND DECOMMISSIONING COSTS

COSTS ASSOCIATED WITH RO AND BRINE CONCENTRATION OPERATION AND MAINTENANCE

November 18, 2004

#	Period	1/7	2/7	3/7	4/7	5/7	6/7	7/7	8/7	9/7	10/7	11/7	12/7
1	[illegible]												
2	Operations Manager												
3	Environmental Manager												
4	[illegible]												
5	Radiation Officer												
6	Chemist												
7	Electrician												
8	Field Operator												
9	[illegible]												
10	Foreman												
11	Truck Driver												
12	Wellfield Operators												
13	Pump Hoist Operators												
14	[illegible]												
15	Senior Geologist												
16													
17	[illegible]												
18													
19	[illegible]												
20	[illegible]												
21	GPM RO Capacity	580	580	580	580	580	580	580	580	580	580	580	580
22	GPM RO Product	464	464	464	464	464	464	464	464	464	464	464	464
23	GPM RO Reject	116	116	116	116	116	116	116	116	116	116	116	116
24	Mil Gals, RO Processed - Month	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000	25,056,000
25	Mil Gals, RO Permeate - Month	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800	20,044,800
26	Mil Gals, RO Reject - Month	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200	5,011,200
27	[illegible]												
28	GPM BC Capacity	125	125	125	125	125	125	125	125	125	125	125	125
29	GPM Distillate	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5	113.5
30	GPM Brine	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
31	Mil Gals, BC Capacity - Month	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000	5,400,000
32	Mil Gals, Distillate - Month	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200	4,903,200
33	Mil Gals, Brine - Month	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000	108,000
34	[illegible]												
35	Beginning Gallons (8 PV Eq.)	306,863,004	280,615,004	233,967,004	216,719,004	185,771,004	160,423,004	135,475,004	110,527,004	85,579,004	60,631,004	35,683,004	11,135,004
36	Beginning PV	1.22	1.12	1.01	0.90	0.80	0.68	0.58	0.47	0.37	0.26	0.16	0.05
37	Gallons Processed Month	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000	24,948,000
38	PV Processed Month	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11
39	Cumulative Gallons Processed	1,841,884,000	1,866,832,000	1,891,780,000	1,916,728,000	1,941,760,000	1,966,724,000	1,991,672,000	2,016,620,000	2,041,570,000	2,066,520,000	2,091,464,000	2,116,412,000
40	Cumulative PV Processed	7.88	7.99	8.10	8.20	8.31	8.42	8.53	8.63	8.74	8.85	8.95	9.06
41	Remaining Gallons to Process	284,615,004	255,967,004	210,718,004	185,771,004	160,423,004	135,475,004	110,527,004	85,579,004	60,631,004	35,683,004	11,135,004	-13,812,996
42	Remaining PV to Process	1.12	1.01	0.90	0.80	0.68	0.58	0.47	0.37	0.26	0.16	0.05	-0.06
43	[illegible]												
44													
45	Description	Item						GW Restoration Operations					
46													
47	Salaries-Direct	$8,700	$8,700	$8,700	$8,750	$8,750	$8,700	$8,700	$8,720	$8,750	$8,700	$8,750	$8,700
48	Wages-Direct	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
49	Insurance-Workmans Compensation	$290	$290	$290	$290	$290	$290	$290	$290	$290	$290	$290	$290
50	Payroll Taxes	$613	$613	$613	$613	$613	$613	$613	$613	$613	$613	$613	$613
51	Medical Insurance	$875	$875	$875	$875	$875	$875	$875	$875	$875	$875	$875	$875
52	401K Contributions	$219	$219	$219	$219	$219	$219	$219	$219	$219	$219	$219	$219
53	Telephone/Telegraph	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250	$1,250
54	Postage/Freight	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
55	Copy Equipment	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
56	Other Equipment & Rental	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
57	Office Supplies	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
58	Office Equipment Maintenance	$60	$60	$60	$60	$60	$60	$60	$60	$60	$60	$60	$60
59	Data Processing	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
60	Maps	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30	$30
61	Drafting & Printing	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
62	Transportation - Air & Car	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850	$850
63	Meals & Entertainment	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
64	Misc. Travel Expenses	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
65	Env-Depreciable Equipment	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
66	Env-Operational Analyses	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800	$2,800
67	Environmental - Miscellaneous	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
68	Safety	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
69	Building Maintenance	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700	$700
70	Misc. Chemicals	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450	$2,450
71	Utilities - Electric, Wellfield	$16,382	$16,382	$16,382	$16,382	$16,382	$16,382	$16,382	$16,382	$16,382	$16,382	$16,382	$16,382
72	Utilities - Electric, Brine Concentrator	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850	$32,850
73	Utilities - Electric, Plant and RO	$3,896	$3,896	$3,896	$3,896	$3,896	$3,896	$3,896	$3,896	$3,896	$3,896	$3,896	$3,896
74	Submersible Pumps	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
75	Submersible Motors	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300	$300
76	Field Piping & Valves	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400	$400
77	Meters	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
78	Misc. Field	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
79	Handtools	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
80	Plant Piping & Valves	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200	$200
81	Plant [illegible] Cons Ind.	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
82	Pumps	$800	$800	$800	$800	$800	$800	$800	$800	$800	$800	$800	$800
83	Plant Electrical	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
84	Filters	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100
85	Evaporation Ponds	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50	$50
86	Roads	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
87	Gas, Oil, Grease	$1,150	$1,150	$1,150	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100	$1,100
88	Disposal - B.C. Solids	$4,291	$4,291	$4,291	$4,291	$4,291	$4,291	$4,291	$4,291	$4,291	$4,291	$4,291	$4,291
89	RO Unit	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250	$250
90	Lab Supplies	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100	$100
91	RO Membrane	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000	$3,000
92	Field Equip. Repairs & Maint.	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150	$150
93	Vehicle Repairs & Maint.	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
94	Vehicles - Pickups	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
95	Vehicles - Tractors & Trucks	$1,800	$1,800	$1,800	$1,800	$1,800	$1,800	$1,800	$1,800	$1,800	$1,800	$1,800	$1,800
96	Vehicles - Automobiles	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500	$500
97													
98	Monthly Total	$94,586	$94,586	$94,586	$94,586	$94,586	$94,586	$94,586	$94,586	$94,586	$94,586	$94,586	$94,586
99	Cumulative Total	$8,490,228	$8,584,606	$8,679,381	$8,773,977	$8,868,562	$8,963,147	$10,057,732	$10,152,317	$10,246,902	$10,341,487	$10,436,072	$10,530,658
100	Period Days	30	30	30	31	30	31	30	31	31	30	30	31

CROWNPOINT SEC. 24 GROUNDWATER RESTORATION AND DECOMMISSIONING COSTS
COSTS ASSOCIATED WITH RO AND BRINE CONCENTRATION OPERATION AND MAINTENANCE

November [illegible]

	Period	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
1	[illegible]								
2	Operations Manager	1	1	1	1	1	1	1	1
3	Environmental Manager	1	1	1	1	1	1	1	1
4	[illegible]								
5	Radiation Officer	1	1	1	1	1	1	1	1
6	Chemist	1	1	1	1	1	1	1	1
7	Electrician								
8	Plant Operator								
9	[illegible] Personnel								
10	Foreman	1	1	1	1	1	1	1	1
11	Truck Driver								
12	Wellfield Operators								
13	Pump Hoist Operators								
14	[illegible]								
15	Senior Geologist								
16									
17	[illegible]	5	5	5	5	5	5	5	5
18									
19	[illegible]								
20	[illegible]								
21	GPM RO Capacity								
22	GPM RO Product								
23	GPM RO Reject								
24	Mil Gals, RO Processed - Month								
25	Mil Gals, RO Permeate - Month								
26	Mil Gals, RO Reject - Month								
27	[illegible]								
28	GPM BC Capacity								
29	GPM Distillate								
30	GPM Brine								
31	Mil Gals, BC Capacity - Month								
32	Mil Gals, Distillate - Month								
33	Mil Gals, Brine - Month								
34	[illegible]								
35	Beginning Gallons (# PV Eq.)								
36	Beginning PV								
37	Gallons Processed Month								
38	PV Processed Month								
39	Cumulative Gallons Processed								
40	Cumulative PV Processed								
41	Remaining Gallons to Process								
42	Remaining PV to Process								
43	[illegible]								
44									
45	Description	Final Decontamination, Decommissioning and Reclamation							
46									
47	Salaries-Direct	$27,417	$27,417	$27,417	$27,417	$27,417	$27,417	$27,417	$27,417
48	Wages-Direct	$0	$0	$0	$0	$0	$0	$0	$0
49	Insurance-Workmens Compensation	800	800	800	800	800	800	800	800
50	Payroll Taxes	4200	4200	4200	4200	4200	4200	4200	4200
51	Medical Insurance	4000	4000	4000	4000	4000	4000	4000	4000
52	401K Contributions	4000	4000	4000	4000	4000	4000	4000	4000
53	Telephone/Telegraph	$900	$900	[illegible]	$950	$950	$900	$950	$900
54	Postage/Freight	$175	$175	$175	$175	$175	$175	$175	$175
55	Copy Equipment	$300	$300	$300	$300	$300	$300	$300	$300
56	Other Equipment & Rental	$200	$200	$200	$200	$200	$200	$200	$200
57	Office Supplies	$160	$160	$100	$160	$100	$100	$100	$100
58	Office Equipment Maintenance	$50	$30	$30	$30	$30	$50	$50	$50
59	Data Processing								
60	Maps					$1,000	$1,000	$1,000	$1,000
61	Drafting & Printing					$2,500	$2,500	$2,500	$2,500
62	Transportation - Air & Car	$300	$300	$300	$200	$300	$300	$300	$300
63	Meals & Entertainment	$300	$300	$300	$300	$300	$300	$300	$300
64	Misc. Travel Expense	$300	$300	$300	$200	$300	$300	$300	$300
65	Non-Depreciable Equipment								
66	Env-Operational Analyses								
67	Environmental - Miscellaneous								
68	Safety								
69	Building Maintenance								
70	Misc. Chemicals								
71	Utilities - Electric, Wellfield								
72	Utilities - Electric, Brine Concentrator								
73	Utilities - Electric, Plant and RO								
74	Submersible Pumps								
75	Submersible Motors								
76	Field Piping & Valves								
77	Meters								
78	Misc. Field								
79	Wellheads								
80	Plant Piping & Valves								
81	Plant Brine Conc Inst.								
82	Pumps								
83	Plant Electrical								
84	Filters								
85	Evaporation Ponds								
86	Resin								
87	Gas, Oil, Grease								
88	Disposal - B.C. Solids								
89	RO Unit								
90	Lab Supplies								
91	RO Membranes								
92	Field Equip. Repairs & Maint.								
93	Vehicle Repairs & Maint.								
94	Vehicles - Pickups								
95	Vehicles - Tractors & Trucks								
96	Vehicles - Automobiles								
97									
98	Monthly Total	$43,242	$43,242	$43,242	$43,242	$46,742	$46,742	$46,742	$46,742
99	Cumulative Total	$10,373,898	$10,417,140	$10,460,382	$10,503,624	$10,550,366	$10,597,108	$10,643,850	$10,690,592
100	Period Days	31	30	31	31	30	31	30	31

D & D COSTS ARE ITEMIZED ON A TASK BASIS

November 19, 2001

ATTACHMENT E-2-2
BUDGET CALCUALTION AND BACKUP

Labor Rates
Electrical Usage
Solid Production

November 19, 2001

LABOR SUMMARIES

		Number	Hourly Rate	Yearly Salary	Annual	Monthly
Management and Accounting						
Salaried	Operations Manager	1	-	$120,000	$120,000	$10,000
Salaried	Environmental Manager	1	-	$105,000	$105,000	$8,750
Salaried	Accounting Manager			$105,000	$105,000	$8,750
Salaried	Accountant		-	$65,000	$65,000	$5,417
Plant Personnel						
Salaried	Plant Superintendent		-	$85,000	$85,000	$7,083
Salaried	Plant Engineer		-	$45,000	$45,000	$3,750
Salaried	Radiation Officer	1	-	$30,000	$30,000	$2,500
Salaried	Chemist	1	-	$46,000	$46,000	$3,833
Salaried	Plant Foreman		-	$28,000	$28,000	$2,333
Salaried	Maintenance Foreman		-	$28,000	$28,000	$2,333
Wage	Lab Technicans		$9.62	-	$20,010	$1,668
Wage	Secretary		$9.62	-	$20,010	$1,668
Wage	Electrician	1	$14.43	-	$30,014	$2,501
Wage	Apprentice Electrican		$12.01	-	$24,981	$2,082
Wage	Plant Operator	1	$11.54	-	$24,003	$2,000
Wage	Assistance Plant Operator		$11.54	-	$24,003	$2,000
Wage	Dryer Operator		$11.54	-	$24,003	$2,000
Wage	Maintenance		$11.54	-	$24,003	$2,000
Wellfield Personnel						
Salaried	Wellfield Superintendent		-	$41,200	$41,200	$3,433
Salaried	Drilling Engineer		-	$40,500	$40,500	$3,375
Salaried	Foreman	1	-	$28,000	$28,000	$2,333
Wage	Truck Driver	1	$11.54	-	$24,003	$2,000
Wage	Electrician		$14.43	-	$30,014	$2,501
Salaried	Data Entry Clerk		-	$20,000	$20,000	$1,667
Wage	Secretary			$20,000	$20,000	$1,667
Wage	Logger		$12.01	-	$24,981	$2,082
Wage	Wellfield Operators	1	$11.50	-	$23,920	$1,993
Wage	Assistant Wellfield Operator		$11.50	-	$23,920	$1,993
Wage	Balancer		$11.50	-	$23,920	$1,993
Wage	Environmental Sampler		$11.50	-	$23,920	$1,993
Wage	Pump Hoist Operators	1	$11.50	-	$23,920	$1,993
Wage	Backhoe Operator		$10.49	-	$21,819	$1,818
Wage	Maintenance		$11.50	-	$23,920	$1,993
Wage	Casing Crew		$11.50	-	$23,920	$1,993
Engineering & Geologic Personnel						
Salaried	Chief Engineer		-	$66,000	$66,000	$5,500
Salaried	RESERVOIR ENGINEER		-	$60,000	$60,000	$5,000
Salaried	Senior Geologist	1	-	$58,000	$58,000	$4,833
Salaried	Geologist		-	$48,800	$48,800	$4,067
Salaried	Logging Supervisor		-	$35,000	$35,000	$2,917
Wage	Secretary			$20,000	$20,000	$1,667
Wage	Surveyor		$12.02	-	$25,002	$2,084
Wage	Assistant Surveyor		$12.02	-	$25,002	$2,084
Wage	Logger		$10.49	-	$21,819	$1,818
	Total #	11				

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
E. Roy Hawkins, Presiding Officer
Dr. Richard F. Cole, Special Assistant
Dr, Robin Brett, Special Assistant

In the Matter of:	)	Docket No.: 40-8968-ML
Hydro Resources, Inc.	)	
P.O. Box 777	)	
Crownpoint, NM 87313	)	Date: May 6, 2005
	)	

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of the foregoing Hydro Resources, Inc.'s Response in Opposition to Intervenors' Written Presentation Regarding Groundwater, Groundwater Restoration and Financial Assurance, **Notice of Eratta** in the above-captioned matter has been served upon the following via electronic mail and U.S. First Class Mail on this 6th day of May, 2005.

Administrative Judge,
E. Roy Hawkens
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop T-3 F23
Washington, DC 20555
Email: erh@nrc.gov

Administrative Judge
Richard F. Cole, Special Assistant
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop T-3 F23
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Office of the Secretary
Attn: Rulemakings and
Adjudications Staff
U.S. Nuclear Regulatory
Commission
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Washington, DC 20555
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Adjudicatory File
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Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory
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Mail Stop: T-3 F23
Washington, DC 20555

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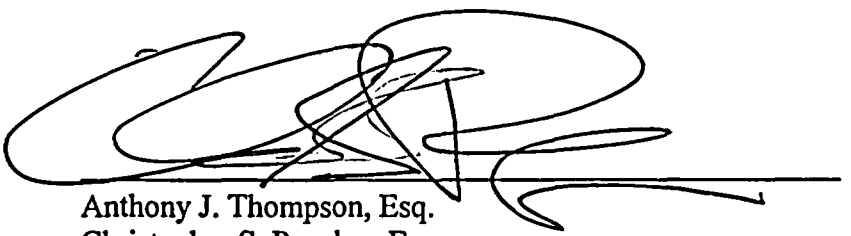

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(hydro resourcesCERTIFICATEOFSERVICE 5-04-05.DOC)

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May 6, 2005

BY ELECTRONIC MAIL AND U.S. FIRST CLASS MAIL

U.S. Nuclear Regulatory Commission
Office of the Secretary
Attn: Rulemaking and Adjudications Staff
Mail Stop: OWFN-16C1
Washington, DC 20555

Re: In the Matter of: Hydro Resources, Inc.
Docket No: 40-8968-ML

Dear Sir or Madam:

Please find attached for filing Hydro Resources, Inc.'s Response in Opposition to Intervenors' Written Presentation Regarding Groundwater, Groundwater Restoration and Financial Assurance, Notice of Errata in the above-captioned matter. Copies of the enclosed have been served on the parties indicated on the enclosed certificate of service. Additionally, please return a file-stamped copy in the self-addressed, postage prepaid envelope attached herewith.

If you have any questions, please feel free to contact me at (202) 496-0780. Thank you for your time and consideration in this matter.

Sincerely,

Anthony J. Thompson, Esq.
Christopher S. Pugsley, Esq.
Thompson & Simmons, PLLC.
Counsel of Record to HRI

Enclosures

(hydro resourcesCOVERLETTTER 5-06-05.doc)