| From: | <bob_specht@blm.gov></bob_specht@blm.gov> |
|----------|---|
| To: | <jrp@nrc.gov></jrp@nrc.gov> |
| Date: | 07/05/2006 12:54:57 PM |
| Subject: | PRI Reynolds Ranch |

James,

Here are the comments from or Physical Scientist Ken. Ken is working on the coal bed Methane there. I have just the wildlife biologist to respond left and the archeologist. (See attached file: Comment on Ken.PRI's RR.doc)

Bob Specht Mineral Geologist Bureau of Land Management Casper Field Office 2987 Prospector Drive Casper, WY 82604

WK (307) 261-7534 Fax (307) 621-7739 bob_specht@bim.gov Mail Envelope Properties (44ABEED4.78F: 8:6031)

| Subject: | PRI Reynolds Ranch |
|----------------------|-------------------------------|
| Creation Date | 07/05/2006 12:54:19 PM |
| From: | < <u>Bob_Specht@blm.gov</u> > |

Created By:

Mime.822

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Bob_Specht@blm.gov

150363

Recipients nrc.gov TWGWP003.HQGWD001 JRP (James Park)

Post Office TWGWP003.HQGWD001

| Files | Size |
|-----------------------------|--------|
| MESSAGE | 408 |
| Comment on Ken.PRI's RR.doc | 108544 |

| None |
|----------|
| Standard |
| No |
| None |
| |
| |

| Concealed Subject: | No |
|--------------------|----------|
| Security: | Standard |

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| Comment | Page | Line | Commentor | |
|---------|--------|--------|------------|--|
| Number | Number | Number | Name | Comment |
| 1 | iii | 15 | McMurrough | The PRI SR-HUP is a (uses =s for the possessive throughout document) |
| 2 | iii | 20 | McMurrough | The current PRI NRC license was issued for |
| 3 | iii | 23 | McMurrough | The PRI Smith Ranch, Highland |
| 4 | iii | 30 | McMurrough | "yellowcake". |
| 5 | iii . | 31 | McMurrough | The current PRI annual |
| 6 | iii | 35 | McMurrough | omit comma between commercial-scale and ISL |
| | iii | 37 | McMurrough | This would enable PRI to |
| 7 | iii | 43 | McMurrough | the PRI request |
| 8 | iii | 43 | McMurrough | with NRC environmental |
| 9 | 2 | 4 | McMurrough | quotation marks – name of NRC report |
| 10 | 2 | 5 | McMurrough | Quality regulations define an |
| 11 | 2 | 21 | McMurrough | the SFC NRC |
| 12 | 2 | 21 | McMurrough | operations, and SFC was notified by a letter |
| 13 | 2 | 22 | McMurrough | Renewal, NRC published |
| 14 | 2 | 28 | McMurrough | The environmental |
| 15 | 2 | 31 | McMurrough | RMAC which |
| 16 | 2 | 33 | McMurrough | The environmenta review |
| 17 | 2 | 36 | McMurrough | for the PRI Highland |
| 18 | 3 | 4 | McMurrough | PRI proposes |
| 19 | 3 | 15 | McMurrough | O-sand Formation |
| 20 | 3 | 25 | McMurrough | The PRI Smith |
| 21 | 3 | 38 | McMurrough | "baseline" |
| 22 | 3 | 42 | McMurrough | solution, or lixiviant, with |
| 23 | 4 | 40 | McMurrough | The hole would then be logged, reamed, then casing would be set and cemented |
| 24 . | 5 | 11 | McMurrough | due to casing failure |
| 25 | 5 | 40 | McMurrough | Under the PRI proposed |
| 26 | 6 | 6 | McMurrough | "barren" |
| 27 | 6 | 8 | McMurrough | and then be reinjected |
| 28 | 6 | 13 | McMurrough | plant IX columns |
| 29 | 6 | 24 | McMurrough | to determine and set |

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| Comment | Page | Line | Commentor | |
|---------|--------|---------|------------|--|
| Number | Number | Number | Name | Comment |
| 30 | 7 | 31 | McMurrough | 10.1.9, the primary goal of the PRI restoration is |
| 31 | 8 | 4 | McMurrough | groundwater to acceptable levelstechniques that include groundwater |
| 32 | 8 | 13 | McMurrough | "sweep" |
| 33 | 9 | 14 | McMurrough | The PRI goal is to return |
| 34 | 10 | 34 | McMurrough | what are critical contamination disposal levels? |
| 35 | 11 | 12 | McMurrough | southern |
| 36 | 12 | 34 | McMurrough | ° or degrees |
| 37 | 12 | 38 | McMurrough | Did you mean to sayprecipitation fromwinds? |
| 38 | | | McMurrough | |
| 39 | | | McMurrough | |
| 40 | 14 | 13 | McMurrough | Is the Q sand and the O sand discussed on page 16 different sands? |
| 41 | 16 | 8 | McMurrough | southern |
| 42 | 16 | 11 | McMurrough | O sand or Q sand ? |
| 43 | 16 | 15 | McMurrough | The EPA |
| 44 | 16 | 16 | McMurrough | O sand or Q sand ? |
| 45 | 17 | 15 | McMurrough | Need more recent wildlife survey, especially raptors? |
| 46 | | | McMurrough | |
| 47 | | | McMurrough | |
| 48 | 16 | After 8 | McMurrough | Coal beds within the Fort Union Formation produce methane gas from numerous wells and fields in the Powder River Basin. Producing coal bed methane wells typically produce water from the coal beds until the coal beds are de-watered and then begin producing gas. The coal bed de-watering process is dependent on the number of producing wells in an area, but can take several months, or in some cases, several years. |
| | | | | The federal Duck Creek Project is located about 9 miles northeast of the Reynolds Ranch Project in T. 38 N. R. 72 W. which is presently producing water and no gas from 8 wells in Sections 7, 8, 17, and 18; about 45 wells have been permitted in the project area. The Duck Creek wells are producing from the Upper and Lower Pawnee Coals of the Fort Union Formation from about 1800 to 2000 feet. |

| Comment | Page | Line | Commentor | |
|---------|--------|--------|------------|---|
| Number | Number | Number | Name | Comment |
| | | | | Nineteen coal bed methane wells have been permitted or drilled in T. 38 N., R. 73 W. west of the Duck Creek area. Several wells have been drilled in T. 36 N., R. 75 W. west of the Reynolds Ranch Project area. The Dry Fork Cheyenne River is located between the Duck Creek and Reynolds Ranch areas and the water drawdown from the Duck Creek Project should not have an affect on the Reynolds Ranch Project at this time; however, if coal bed methane extraction is successful in the Duck Creek Project area and in other wells and fields closer to the Reynolds Ranch Project, the potential impact of the drawdown of the regional water table may need to be considered at some time in the future. |
| 49 | 20 | 26 | McMurrough | recovery are impacts |
| 50 | 22 | 13.14 | McMurrough | What are acceptable CO2 and HCl gas venting levels? |
| 51 | | | McMurrough | |
| 52 | •• | | McMurrough | |
| 53 | | | McMurrough | |
| 54 | | | McMurrough | |
| 55 | | | McMurrough | |
| 56 | 26 | 11-13 | McMurrough | How much surface disturbance-area of disturbance for facilities, roads, etc? These would be direct impact to soil and vegetation and indirect impact to other resources such as water, air, wildlife, range |
| 57 | 26 | 20 | McMurrough | Impacts to Wildlife-Are surveys recent enough to be viable? |
| 58 | 29 | 7 | McMurrough | Where will these wastes be disposed? |
| 59 | 29 | 9-10 | McMurrough | Will the storage area be secured and signed-this is mitigation. |
| 60 | | | McMurrough | |

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Specialist List Cindy Allen Chris Arthur Eve Bennett Mike Brogan Sarah Bucklin-Comiskey Tom Durst **Charlie Fifield** Dale Hanson Patrick Moore Joe Myers Linda Slone Randy Sorenson Bob Specht James Wright Ken McMurrough

Position Title CFO/BLM Forester CFO/BLM Archeologist CFO/BLM Recreational Planner and Visual Specialist CFO/BLM Hydrologist CFO/BLM Wildlife Biologist CFO/BLM Mineral Geologist CFO/BLM Rang Land Specialist WSO/BLM Paleontologist CFO/BLM Assistant Manger Mineral and Lands CFO/BLM Assistant Manger Resources/Soils CFO/BLM NEPA Coordinator CFO/BLM Realtor CFO/BLM Geologist CFO/BLM Wildlife Biologist CFO/BLM Physical Scientist