

NMA/NRC Uranium Recovery Workshop

Uranium Activity
&
Wyoming Land Quality Division

New Regulations

- Chapter 11 was revised in 2005.
- No new permitting has been completed under the new regulations.
- These regulations remain untested.

In Situ Mining Permit Application Requirements Handbook

- LQD completed a DRAFT (March 2007) of a handbook (<http://deq.state.wy.us/lqd/noncoalpermitting>).
- We have emailed it to the Wyoming Mining Association and those operators for which we had email addresses.
- We encourage applicants to use this handbook.
- We are interested in getting feedback concerning improvements or questions (rchanc@state.wy.us).

Contemporaneous Reclamation

My personal issue:

- Groundwater restoration must proceed as fast as mining.
- Not having capacity is not an excuse.
- Not in this year's budget is not an excuse.
- Don't blame the staff – blame me.

Best Practicable Technology (BPT)

- The permit is required to contain information concerning BPT used to restore the groundwater.
- Regulations outline how LQD will evaluate if BPT has been applied.
- Bioremediation has been used on a limited basis with very promising results.
- LQD is considering bioremediation as part of BPT.

Topsoil Protection

- Current policy does not ask for complete salvage of topsoil from well fields.
- Basis was leaving topsoil undisturbed is best.
- This does require best management practices while installing wells.
- Topsoil is scraped aside from well pads and reserve pits during well installation.
- There are cases where topsoil and overburden have become mixed.

Well Completion

- One issue during the promulgation of new regulations was the thickness of the annular space (i.e., size of the bore hole relative to the size of the well casing).
- Concerns were the placement of annular sealant materials; the ability to get good returns to the surface.
- Some of the new projects being investigated are deep deposits; we have concerns regarding the ability to get good completion on deep wells (>750 feet).

Aquifer Exemptions

- EPA responded to LQD's new regulations stating our rationale for the exemption boundary did not meet EPA regulations.
- Our concern was the exemption boundary would coincide with the monitor well ring.
- We have met with them and have made progress on an acceptable resolution.

Workload

- Exploration by Drilling (i.e., Drilling Notifications (DN))
 - 3 - historical DN's
 - 16 - new DN's
- Expect 5 to 7 new in situ mining permit applications during 2007 with similar numbers in 2008.

Staffing

- LQD has 2 major programs – Coal and Noncoal with 41 total employees.
- The staff is not split; everyone does both.
- 10 years ago with half of Wyoming's current coal production we dedicated 34 man-years to Coal.
- Today with twice the coal production and increasing activity we have 25 man-years dedicated to coal.

Staffing

- How is it possible to have a huge increase in activity but decrease the amount of effort?
- Good staff.
- Good operators.
- None of us waste time on picky stuff; we cooperate and get the job done.
- During this time we have increased our effort in noncoal from 7 to 16 man-years.

Staffing

- Most of the increased effort in noncoal has been in response to secondary impacts due to oil and gas development.
- Do we have enough staff to adequately respond to the oncoming uranium permitting process?
- It depends.

Staffing

- There will be a learning curve for both LQD staff and especially industry on how to efficiently permit.
- Indications are promising but it is unknown how cooperative industry will be.
- We are confident we can be responsive with 3 to 4 new permits. More than this number will slow our review times.

Staffing

- We expect 5 to 7 new permit applications per year for the next few years.
- We can process 3 to 4 per year.
- We do not expect more staff.
- All of DEQ has seen a 20% increase in staff the last few years and more previously. There is no enthusiasm for growth of government.

Reclamation Bonding

- Bonds for Drilling Notifications run from \$10,000 to \$1 million.
- Bonds for active in situ mining permits generally will run from \$10 to \$20 million.
- A new permit may be much lower; we review the bond amount annually.
- Contemporaneous reclamation will keep the bond amount low.

? Questions ?

- Web site
<http://deq.state.wy.us/lqd/noncoalpermitting>
- Email rchanc@state.wy.us
