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 **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.

have become mixed.

 Topsoil is scraped aside from well pads and reserve pits during well installation.

■ There are cases where topsoil and overburden

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.

•	
 	<u> </u>

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.

_	

