



# Department of Environmental Quality



To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Dave Freudenthal, Governor

John Corra, Director

September 10, 2009

Mr. Thomas Hardgrove  
COGEMA Mining, Inc.  
P. O. Box 730  
Mills, WY 82644

Ms. Donna Wichers  
Uranium One  
139 West Second St., Suite 1C  
Casper, WY 82601

**RE: Irigaray-Christensen Ranch In Situ Operations, Permit No. 478**

Dear Tom and Donna:

I am aware of COGEMA's pending sale of the Irigaray Christensen Ranch In Situ Uranium Operations to Uranium One.

As a result, I asked the Land Quality Division District 3 staff to provide a status of current permitting actions at Irigaray that are of interest to all of us.

1. Christensen Ranch Unit 7 well field: the data package for this well field is currently under review by the Land Quality Division.
2. Christensen Ranch Unit 7 wells completed with Schedule 40 PVC well casing: all wells in Unit 7 completed with Schedule 40 casing as of July 10, 2008, will be accepted for Class III use provided they pass all required Mechanical Integrity Tests (MIT). On that date Change No. 35 to Permit No. 478 was approved which requires that all Class III wells be completed with Schedule SDR-17 casing or better.
3. Land Quality Division NonCoal Rules and Regulations, Chapter 11 Update: COGEMA's revision (TFN 4.1/399) is currently under review. However, preliminary review of this permit update revision has brought to light that a considerable number of long-standing problems with Permit No. 478 exist. Many of these problems simply relate to the age of this permit with the original Permit No. 478 having been approved on August 18, 1978:
  - a. the adjudication section of Permit No. 478 relating to the Irigaray portion dates to 1978 and is completely out of date.
  - b. the adjudication section of Permit No. 478 relating to the Christensen Ranch portion dates to 1988 and is seriously out of date.
  - c. there are many volumes associated with Permit No. 478 on the Division's permit shelves relating to long-ago studies and reports, many relating to Irigaray, that can only be of historical interest. Agreements to relegate certain of these documents to the archives are needed.
  - d. Most portions of the existing Permit No. 478 baseline sections, mine plan and restoration/reclamation plans are on brittle, aging paper in disintegrating volumes. They need to be recopied, repaginated if necessary, and placed in fresh binders. There are structural problems that need correcting such as permit commitments in Appendix D that need to be moved to the mine or restoration/reclamation plans where they will not be overlooked.

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- e. The baseline data for future Christensen Ranch Mining Units 8 and later likely does not meet Chapter 11 standards. A consensus is needed bringing it to new Chapter 11 standards.

I ask that representatives of Land Quality Division District 3, COGEMA and Uranium One meet to discuss the above items.

There may be some urgency as W.S. § 35-11-408 requires that a mining permit be in compliance with the Act as part of a permit transfer.

Yours truly,



Donald R. McKenzie  
Administrator  
Land Quality Division

DRM/bb

Cc: NRC - MD  
District III