Bruce King
GOVERNOR

George S. Goldstein, Ph.D.
SECRETARY

Larry J. Gordon, M.S., M.P.H.
DEPUTY SECRETARY

ENVIRONMENT department

STATE OF NEW MEXICO
ENVIRONMENTAL IMPROVEMENT DIVISION
P.O. Box 968, Santa Fe, New Mexico 87503
(505) 827-5271
Thomas E. Baca, M.P.H., Director

May 26, 1981

Mr. Thomas F. Bailey, President
UNC Mining and Milling
P.O. Drawer QQ
Gallup, NM 87503

Dear Mr. Bailey:

Prior approved extensions to both your mine backfilling groundwater discharge plan (DP-63) and your radioactive material license backfilling amendment (NM-UNC-ML-16) expire on June 15, 1981. Response to comments on material submitted to date pertaining to the continued use of backfilling with tailings sands has been requested of Mr. Todd Miller of UNC (reference letters from EID to UNC dated April 24 and April 27, 1981, attached).

Of particular concern is possible delay in submittal of modeling analysis for evaluation of the short and long term environmental impacts. We also note that there is significant variability in the monitoring data submitted for the backfilling operation. Since this data will be used as input to the model, the variability could have an impact on model validity. Detailed descriptions of the backfilling operation and sampling and analytical procedure used to obtain the data and a discussion of the data variability will therefore be required for review.

A response to the above requests well in advance of the June 15 deadline is essential for our review and evaluation. My staff has arranged to meet with Mr. Miller at Church Rock on June 2, 1981 for a visual inspection of the backfilling operation and sampling and analytical procedures.

Sincerely,

Gerald W. Stewart

Gerald W. Stewart, Health Program Manager
Uranium Licensing Section
Radiation protection Bureau

KB/GWS/dm
Enclosures

9804240093 810526