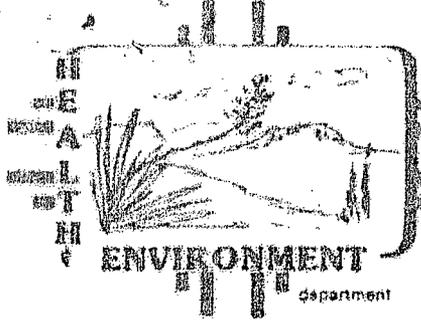


James Bruce King
GOVERNOR



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION
P.O. Box 968, Santa Fe, New Mexico 87504-0968
(505) 984-0020

Russell F. Rhoades, M.P.H., Director

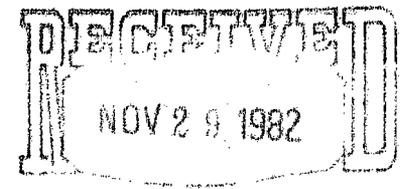
George S. Goldstein, Ph.D.
SECRETARY

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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 29, 1982

Mr. Thomas Hill
United Nuclear Corporation
Mining and Milling Operation
P.O. Box QQ
Gallup, NM 87301



RADIATION PROTECTION BUREAU

RE: Discharge Plans DP-63 and DP-29

Dear Mr. Hill:

I am writing in regard to backfilling operations at the Northeast Church Rock Mine and proposed backfilling operations at the Old Church Rock Mine. I will be taking over from Pat Longwire the review of these projects.

Your present discharge plan (DP-63) for backfilling at the Northeast Church Rock Mine (NECR) expires on January 31, 1983. Thomas Baca in his letter of February 1, 1982, indicated that a discharge plan renewal application should be submitted by September 30, 1982, in order to allow sufficient time for public notice and a possible public hearing. Do you wish to renew the discharge plan for backfilling at NECR Mine? If so we will consider the information presented in the Battelle reported (received 10/4/82) concerning the potential for contaminant transport into the Westwater as part of such a discharge plan. We will need additional updated information as to proposed monitoring locations, backfilling quantities and the other items addressed in DP-63. A site map showing property boundaries, stopes to be backfilled, and relevant mine and well sampling locations will also be necessary.

However, we will not be able to complete consideration of a renewal of DP-63 until the outstanding commitments of the current plan have been met. These are referred to in the February 1, 1982, letter from Thomas Baca to Thomas Bailey. The commitments still outstanding are:

1. Commitment 9. Submit annually a comprehensive report including water quality data and relevant backfilling data along with your interpretation of this data.
2. Commitment 5. Submittal of quarterly monitoring reports. Apparently we have not received the monitoring results for the first and third quarters of 1982.

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November 29, 1982

The earliest possible submittal of these items will be necessary to assure that the renewal application can be evaluated before the January 31, 1983, expiration date for the previous discharge plan.

A preliminary review of the Battelle report has brought up several questions, but these could be more appropriately discussed after we know what your plans are regarding renewal.

In regard to the Old Church-Rock Mine do you still wish to amend DP-29 to allow backfilling? Todd Miller's letter of July 19, 1982, indicated that current plans are to delay backfilling for the foreseeable future.

In the event that you do not plan to renew the discharge plan for either NECR or OCR mines, it is planned to allow either mine to flood?

Please contact me if any of these questions need clarification or if I can be of any other assistance.

Sincerely,



Karl Souder
Ground Water Hydrologist
Ground Water Section

KS:jba

cc: William Bennett, District I Manager
Ray Madson, EID Field Office, Grants
Gerald Stewart, EID Radiation Section