

**QUIVIRA MINING COMPANY**

POST OFFICE BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

July 29, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William D. Rowe, Jr.  
United States Environmental Protection  
Region VI  
Superfund Enforcement Section (6H-EE)  
1445 Ross Avenue Suite 1200  
Dallas, Texas 75202-2733

RE: UNC - Church Rock Superfund Site

Dear Mr. Rowe:

Pursuant to your letter dated July 11, 1988, Quivira Mining Company responds to EPA's inquiry in the same question order number and letter designations.

Quivira Mining Company ("QMC") is a uranium mining and milling company that has operated in New Mexico since the early 1950's with facilities at Ambrosia Lake and Church Rock. The Church Rock site is a mining operation only. The facility has no milling capability, so mineral ores were transported off-site by truck for milling. The site was not mined before QMC commenced operations in the early 1970's. The mines were placed in a "standby mode" and mining operations ceased in January of 1985.

1. The Church Rock operation consists of two underground mines, CRI and CRI-E on the northern 1/2 of Sections 35 and 36, T17N, R16W, respectively on the Navajo Reservation. In addition, a Business Lease was made with the State of New Mexico in 1970 for surface use on the S1/2, Section 36, T17N, R16W ("Business Lease"). Except as specifically stated otherwise, the operations referenced in this letter are confined to the Business Lease.

In 1984, United Nuclear Corporation acquired property containing the QMC Business Lease in a land swap with the State of New Mexico. The Surface Lease Agreement between UNC and QMC contains essentially the same provisions as the original State of New Mexico Business Lease.

*from Labby 11/8/94.  
he received from EPA  
Dallas office 11/7/94.  
KAA  
copy to Susan Fridby*

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Subsequent to acquiring the Business Lease, QMC constructed a main office building, warehouse and training school. Ancillary to the main office complex use, which is enclosed by a security fence, the surface of the Business Lease has been used to temporarily store various equipment and materials such as a surface drill rig, mine water settling pond sediments and protore (low grade uranium ore). The only materials currently stored in this area are a protore pile, scrap steel, several 60 foot joints of 60" steel ventilation hole casing, and miscellaneous tankage and piping.

During 1978 and 1979 three shallow (few inches) circular evaporation pads were constructed with a road grader. The pads were approximately 90 feet in diameter with outside berms 1' to 1-1/2' in height. During 1978 and 1979 sediments extracted from the mine settling ponds located at the CRI mine site were trucked to these pads for drying. The dried material was picked up and shipped by truck, along with the uranium ore extracted from the CRI and CRI-E mines, to the Ambrosia Lake mill for processing. These pad areas were cleaned up and reclaimed in the latter part of 1979.

During the primary development of the mines (shaft sinking, haulage drifting and raising activities) waste rock was produced which consisted of sandstone and shales containing only background levels of radioactivity. This material was placed adjacent to the shafts and used to form pads for ore and supply storage.

During the development and extraction of the ore bodies, a low grade material was produced from the mine which is designated protore. This material is comprised of arkosic

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6. Not applicable. Material transported to the Business Lease for temporary storage or stockpiling was done with QMC owned equipment.
7. A copy of the Church Rock Abandonment and Reclamation Plan dated January, 1987, is attached as Exhibit 3. This Abandonment and Reclamation Plan relates to the CRI and CRI-E operations and does not address the Business Lease except for plans to fill mine shafts and ventilation holes with protore now stockpiled at the Business Lease.
8. Quivira Mining Company ("QMC"), which has no subsidiaries, is a wholly owned subsidiary of Kerr-McGee Corporation.

The following documents pertaining to the Business Lease listed below and are attached to this response:

1. BL 756 - State of New Mexico (March 31, 1970)
2. BL 756 - State of New Mexico (March 31, 1982)
3. BL 934 - State of New Mexico (March 31, 1983)
4. Surface Lease Agreement - United Nuclear Corporation  
(February 9, 1984)

Other documents pertaining to the Business Lease are maintained either on-site at the main office building, or at the headquarters of Kerr-McGee Corporation in Oklahoma City. Such documents relate to the mining operations, finances and manpower of the business. Unless subject to extended retention for legal reasons, such documents are retained, and subsequently destroyed, in accordance with

ATTACHMENT 1

Areas possibly requiring access during remedial activity at the UNC site (highlighted in yellow)

M = MINERAL  
S = SURFACE

↑ NAVAJO NATION

