COLORADO OFFICE
10758 W. CENTENNIAL RD., STE. 200
LITTLETON, CO 80127
TEL: (866) 981-4588
FAX: (720)-981-5643

WYOMING OFFICE
5880 ENTERPRISE DR., STE. 200
CASPER, WY 82609
TEL: (307) 265-2373
FAX: (307) 265-2801

LOST CREEK ISR, LLC

May 20, 2013

ATTN: Document Control Desk
Director, Office of Federal and State Materials and Environmental Management Programs,
U.S. Nuclear Regulatory Commission,
Washington DC 20555-0001

Re: Request to Remove Pre-Operations License Conditions
License Number SUA-1598, Docket 40-9068

To Whom It May Concern:

License SUA-1598, Amendment 1, contains license conditions that must be addressed prior to commencement of operations. This submittal provides the information required by several pre-operations license conditions and seeks removal of the conditions from the license.

License Condition 11.4
Several ring monitor wells in Mine Unit 1 were recompleted pursuant to a request from the Wyoming Department of Environmental Quality – Land Quality Division in order to ensure proper monitoring for excursions. The wells which were recompleted have been sampled, four rounds each, and new UCL parameters calculated based on the procedures described in LC 11.4. The UCLs are calculated individually for each well as opposed to the State of Wyoming method which is based on average values for each type of monitor well (ring, overlying, and underlying). Please find attached three tables showing the results of sampling and the calculation of the UCLs.

License Condition 12.1
Lost Creek ISR (LCI) provided copies of the Class I and Class III UIC Permits on August 6, 2012 (ML12235A356) to satisfy this condition. LCI hereby requests license condition 12.1 be removed.

License Condition 12.4
During February and March of 2013 a general field inspection of the Lost Creek region was performed to determine if any new non-mine related wells had been installed. No such wells were found. Additionally, the Wyoming State Engineer's website, which maintains a list of all water wells permitted by the agency, was reviewed on March 26th and no new permits for water wells had been issued. Therefore, to the best of LCI's knowledge, no new non-mine wells have been installed within one kilometer of the license area since the issuance of the Technical and Environmental Reports to the NRC in October 2007. LCI requests license condition 12.4 be removed from the pre-operations section of the license and placed in section 11 "Standard Conditions."

FSME20

License Condition 12.5

Please find behind this cover the qualifications of our proposed Health Physics Technician, Mr. Chris Pedersen. In summary, Mr. Pedersen has a MS Degree in Health Physics, a BS Degree in Environmental Health and has been closely involved in the development of the health physics procedures for the Lost Creek Project over the past year. Mr. Pederson has also attended several training course while with Ur-Energy, including 40 hour RSO Training, DOT Training, Respiratory Protection Training, and manufacturer training on the Protean alpha/beta sample counter.

The qualifications of Dr. Charles Kelsey, Facility RSO and EHS Supervisor, were previously supplied on November 4, 2011 (ML11319A195).

License Condition 12.9

The required radiological environmental monitoring program, including soil samples co-located with air particulate samples, was submitted to the NRC on February 11, 2013 (ML13052A045). LCI requests removal of License Condition 12.9.

License Condition 12.14

The required Quality Assurance Project Plan was submitted to the NRC on April 24, 2013 along with a request to remove the license condition.

License Condition 12.15

Please find behind this cover a summary of the water quality from Bureau of Land Management wells "Battle Springs Draw 4451" and "Battle Spring Well 4777" that fall within one kilometer of the license area. Two additional wells fall within the same area but have not been operational for some time and therefore have not been sampled ("East Eagle Nest Draw Well," and "Boundary Well 4775"). All four wells are included in the Lost Creek "Ground Water and Surface Water SOP ENV-007" which requires quarterly sampling of each of the four wells if they are in working order.

If you have any questions regarding this letter or require additional information please feel free to contact me at (307) 265-2373.

Sincerely,
Lost Creek ISR, LLC
By: Ur-Energy USA Inc., Manager

John W. Cash, V.P. of Regulatory Affairs, Exploration and Geology

Cc: NRC – Deputy Director Decommissioning and Uranium Recovery Licensing Directorate
Mrs. Melissa Bautz, Wyoming DEQ, w/o attachments
Mrs. Theresa Horne, Ur-Energy, Littleton
Mr. Mark Newman, Rawlins BLM, w/o attachments
Mr. John Saxton, NRC, Rockville, via e-mail

Mine Unit 1
Monitor Well Ring UCLs

Sample ID	Collection Date	Baseline Data			Upper Control Limits		
		Alkalinity, Total as CaCO3 (mg/L)	Chloride (mg/L)	Conductivity, µmho/cm	Alkalinity, Total as CaCO3 (mg/L)	Chloride (mg/L)	Conductivity, µmho/cm
M-101	2/15/12	94	6	530	177	21	937
M-101	12/4/12	126	6	541			
M-101	1/18/13	115	6	702			
M-101	3/18/13	123	6	606			
M-102	4/20/09	129	5	753	138	20	834
M-102	5/4/09	131	5	767			
M-102	5/18/09	131	5	724			
M-102	6/1/09	133	5	726			
M-103A	2/14/12	142	7	751	151	21	1,165
M-103A	12/3/12	144	6	656			
M-103A	1/18/13	144	6	883			
M-103A	3/26/13	146	6	759			
M-104	2/14/12	140	7	737	160	22	1,142
M-104	12/4/12	146	7	643			
M-104	1/18/13	148	6	866			
M-104	3/18/13	146	7	732			
M-105	2/15/12	125	6	647	149	21	1,002
M-105	12/7/12	132	6	589			
M-105	2/28/13	133	6	774			
M-105	3/26/13	134	6	652			
M-106	2/15/12	125	6	588	133	21	943
M-106	12/7/12	126	6	549			
M-106	1/21/13	128	6	723			
M-106	3/27/13	128	6	621			
M-107	2/15/12	124	6	623	139	21	978
M-107	12/7/12	129	6	567			
M-107	1/21/13	130	6	750			
M-107	3/26/13	128	6	613			

Mine Unit 1
Monitor Well Ring UCLs

M-108	2/15/12	108	6	484	127	21	828
M-108	12/6/12	114	6	443			
M-108	1/21/13	115	6	612			
M-108	3/28/13	114	6	523			
M-109	4/20/09	86	5	483	96	20	518
M-109	5/4/09	86	5	488			
M-109	5/18/09	88	5	470			
M-109	6/1/09	90	5	487			
M-110	2/15/12	112	6	442	152	22	1,012
M-110	12/6/12	126	7	509			
M-110	1/25/13	125	7	690			
M-110	3/28/13	126	7	576			
M-111	2/16/12	98	6	454	146	21	815
M-111	12/6/12	114	6	440			
M-111	1/25/13	113	6	599			
M-111	3/28/13	116	6	513			
M-112	4/20/09	113	6	545	118	20	595
M-112	5/4/09	113	5	544			
M-112	5/18/09	113	5	515			
M-112	6/1/09	115	5	530			
M-113	4/20/09	95	53	469	105	70	505
M-113	5/4/09	97	56	467			
M-113	5/18/09	98	56	448			
M-113	6/1/09	99	56	466			
M-114A	2/21/13	96	5	420	124	20	695
M-114A	3/25/13	102	5	460			
M-114A	4/12/13	104	5	464			
M-114A	5/1/13	108	5	543			
M-115A	2/21/13	108	6	415	129	20	681
M-115A	3/25/13	117	5	455			
M-115A	4/12/13	109	5	473			
M-115A	5/1/13	109	5	533			

Mine Unit 1
Monitor Well Ring UCLs

M-116A	2/21/13	106	5	427	137	20	650
M-116A	3/25/13	111	5	480			
M-116A	4/12/13	120	5	460			
M-116A	5/1/13	110	5	525			
M-117	2/16/12	96	5	434	135	20	674
M-117	12/6/12	102	5	398			
M-117	1/28/13	110	5	519			
M-117	3/27/13	111	5	461			
M-118	2/16/12	96	5	431	107	20	714
M-118	12/4/12	100	5	413			
M-118	1/24/13	99	5	545			
M-118	3/25/13	100	5	447			
M-119	4/21/09	114	5	498	116	20	551
M-119	5/5/09	114	5	504			
M-119	5/19/09	114	4	472			
M-119	6/2/09	113	5	490			
M-120A	2/17/12	107	5	453	128	20	679
M-120A	12/10/12	113	5	395			
M-120A	1/18/13	114	5	521			
M-120A	3/25/13	115	5	435			
M-121	2/16/12	118	6	482	143	21	761
M-121	12/10/12	115	6	407			
M-121	1/18/13	126	5	546			
M-121	3/14/13	124	5	530			
M-122	4/21/09	115	5	498	116	20	554
M-122	5/5/09	114	4	503			
M-122	5/19/09	114	4	469			
M-122	6/2/09	114	5	487			
M-123	2/17/12	114	5	467	133	20	669
M-123	12/4/12	120	5	397			
M-123	2/28/13	120	5	514			
M-123	3/26/13	121	5	464			

Mine Unit 1
Monitor Well Ring UCLs

M-124	4/21/09	112	5	454	117	20	503
M-124	5/5/09	112	4	462			
M-124	5/19/09	112	4	434			
M-124	6/2/09	114	5	454			
M-125	4/21/09	110	5	541	126	20	593
M-125	5/5/09	117	5	545			
M-125	5/19/09	111	5	514			
M-125	6/2/09	111	6	528			
M-126	4/21/09	84	7	494	100	21	537
M-126	5/5/09	82	6	495			
M-126	5/19/09	86	6	471			
M-126	6/2/09	90	6	491			
M-127	2/17/12	110	6	449	144	21	761
M-127	12/4/12	115	6	438			
M-127	1/23/13	125	6	577			
M-127	3/26/13	117	6	488			
M-128	2/17/12	110	6	506	121	21	779
M-128	12/4/12	113	6	441			
M-128	1/24/13	114	6	592			
M-128	3/18/13	114	6	504			

Water Quality of BLM Stock Wells in Vicinity of the Lost Creek Project

Well Name	Sample Date	General Quality														Radionuclides							
		Na	K	Ca	Mg	Cl	HCO3	CO3	SO4	SiO2	NO3 + NO2	NH3 - N	TDS	Specific Cond. µmhos/cm	Lab pH (SU)	Alk.	Gross Alpha (pCi/L)	Gross Beta (pCi/L)	Pb-210 (pCi/L)	Po-210 (pCi/L)	Th-232 (pCi/L)	Ra-226 (pCi/L)	Ra-228 (pCi/L)	Ra-226 + Ra-228 (pCi/L)
Battle Spring Draw 4451	8/27/09	30	3	167	8	7	206	<5	340	--	<0.05	<0.05	698	929	7.94	--	1230	313	---	---	---	11	8	19
	6/29/10	31	3	170	8	7	200	<5	353	16.5	<0.1	<0.05	694	948	7.67	164	1190	249	---	---	---	7.9	5.4	13.3
	7/25/12	33	3	172	8	7	201	<5	336	16.5	<0.1	<0.05	709	995	7.61	165	816	291	---	---	---	6.1	6.6	12.7
Battle Spring Well 4777	4/3/13	32	3	161	10	11	186	<5	349	14.9	<0.1	<0.05	686	972	7.8	152	31.5	14.3	<1.3	<1	0.009	7.3	7.9	15.2

Well Name	Sample Date	Minor Elements																			
		U	Al	As	Ba	B	Cd	Cr	Cu	F	Fe		Hg	Mn		Mo	Ni	Pb	Se	V	Zn
											Dis.	Tot.		Dis.	Tot.						
Battle Spring Draw 4451	8/27/09	0.911	<0.1	<0.001	<0.1	<0.1	<0.005	<0.05	<0.01	0.1	<0.03	0.11	<0.001	0.02	0.02	<0.1	<0.05	<0.001	0.015	<0.1	0.02
	6/29/10	1.1	<0.1	<0.001	<0.1	<0.1	<0.005	<0.05	<0.01	<0.1	<0.03	0.11	<0.001	0.01	0.01	<0.1	<0.05	<0.001	0.025	<0.1	0.03
	7/25/12	1.03	<0.1	<0.001	<0.1	<0.1	<0.005	<0.05	<0.01	<0.1	<0.03	0.11	<0.001	0.01	0.01	<0.1	<0.05	<0.001	0.025	<0.1	0.01
Battle Spring 4777	4/3/13	<0.0003	<0.01	<0.001	<0.1	<0.1	<0.005	<0.05	<0.01	<0.1	<0.03	2.13	<0.001	0.08	0.08	<0.1	<0.05	<0.001	<0.001	<0.1	<0.01

Units are in mg/L unless otherwise specified

Dis. - Dissolved

Tot. - Total

Christopher J. Pedersen

970-237-2052 cpedey@gmail.com

EDUCATION

Colorado State University — **Graduated Spring 2011**
MS Health Physics GPA 3.4

Colorado State University — **Graduated Fall 2011**
BS Major Environmental Health GPA 3.8

United States Air Force Academy — **July 2005 - Aug 2007**
Studied Systems Engineering GPA 3.3

RELEVANT COURSE WORK

Radiation Physics and Dosimetry (two semesters):

- Learned the fundamentals of internal and external dosimetry, radiation shielding, criticality safety, and in situ mining
- Comprehend NRC regulations, NCRP and ICRP guidelines, and ALARA principles

Nuclear Instruments and Measurement laboratories (two semesters):

- Assembled and performed measurements with the following detectors: GM detectors, NaI detectors, Ion Chambers, Surface Barrier detectors, gas flow proportional counters, BF_3 neutron detectors, High Purity Germanium detectors, Thermoluminescent dosimeters, and Fricke solution dosimetry

Radiation Chemistry with laboratory:

- Studied the chemistry of the actinide series, with an emphasis on uranium
- Learned environmental sampling and sample preparation procedures
- Performed radiochemical analysis using the following methods: Ion exchange column (same process as at an in situ mine, but on an analytical scale), liquid scintillation counting (used for alpha and beta radiation), and radium measurements by radon emanation method

Aerosols:

- Learned the fundamentals of aerosol characteristics, crucial for air sampling
- Performed sampling in the laboratory with an Aerodynamic Particle Sizer

Practicum at Los Alamos National Lab:

- Actively participated in a simulated exercise to cut a contaminated pipe in a glove bag while wearing full Tyvek suit with respirator
- Participated in a table top exercise simulating a response to a fire at a radioactive waste disposal site

WORK EXPERIENCE

Ur-Energy Health Physics Technician — **March 2012 - Present**

- Writing Standard Operating Procedures for the radiation protection program for the proposed uranium mine/mill
- Reviewing and Updating the Prompt Fission Neutron Tool Radiation Protection Program
- Environmental sampling and laboratory results report writing
- Maintaining TLD dosimetry badges and employee dose records
- Training new employees on safety at the Lost Creek property

Colorado State University Laboratory Technician — **Oct 2011 – March 2012**

- Updating an automated alpha and beta proportional counter to operate with a desktop computer

- Maintain and operate a High Purity Germanium detector operating on Genie 2000 software
- Inspecting NaI detectors for defects

Tetra Tech Inc., Fort Collins CO **Jun 2010 - Aug 2010**

- Collected core soil samples and radon samples performed for radiation surveying pre-mining operation for Sheep Mountain uranium mine
- Developed presentations regarding regulatory requirements: Onsite Meteorological Measurements, Respiratory Protection Programs, and Respirator Fit Testing requirements
- Performed quality control of the installation of a high density geomembrane in a tailings pond for a copper mine

Training Courses

Respiratory Protection Program Training Mar 2012

- Learned about respirator and filter types, training requirements of respirator users, proper cleaning procedures, and other pertinent regulations
- Practices disassembling various respirators and proper donning and doffing procedures
- Trained on the use of the Portacount Respriator Fit Tester (used in Ur-Energy's Respiratory Protection Program)

RSO Refresher Training (40 hours) Apr 2012

- Learned about radiation principles, dose, risk, detection, Resrad, MILDOS, and some of the regulations pertaining to mining.
- Discussed example scenarios, such as emergency situations and dose measurements

DOT Radioactive Materials Transportation Training Oct 2012

- Learned how to classify radioactive materials for shipment, proper packaging, labeling, marking, placarding, and creating shipment documentation.

Manufacturer Training on Protean Alpha/Beta Sample Counter Feb 2013

- Learned how the Protean Alpha/Beta Sample Counters work
- Learned how to calibrate, set up sample programs, operate the software, and retrieve data

Certificate of Completion

This certifies that

CHRIS PEDERSEN

has successfully completed the course entitled

Occupational Respiratory Protection #134

(40 hours)

Awarded this date of March 16, 2012, in Casper, Wyoming

4.0 Continuing Education Units

Darell A. Bevis

Darell A. Bevis
Instructor

Bevis Respirator Consultants

Certificate of Completion

This is to certify that

Chris Pedersen

has successfully completed a 40-hr refresher course on

Radiation Safety Officer Training

Presented by Two Lines, Inc.

Fort Collins, Colorado April 23 – 27, 2012

Instructors

Janet A. Johnson, Ph.D., CHP, CIH _____

Craig A. Little, Ph.D. _____

Kathleen R. Meyer, Ph.D. _____

Robert Meyer, Ph.D. _____

UR Energy

Chris Pedersen

has successfully completed

Radioactive Materials by Ground & Air Transportation Training

Valid: October 9, 2012 through: October 9, 2015

This certifies that the above has successfully completed the training and testing requirements as identified in 49 CFR, Part 172, Subpart H and IATA, Section 1.5

Philip C. Rieke

Instructor

Certificate of Training

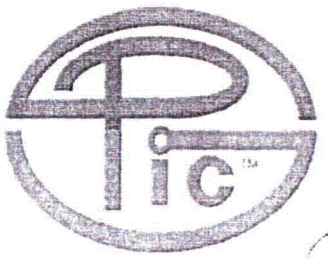
Chris Pedersen

With UR-Energy Inc.
for

Successful completion of training on the operation of the

Protean ASC 950-DP system
Vista FC Software
Duo Software
Moreover, is qualified to use, calibrate, program, and maintain this instrumentation and the applicable software.

Protean Instrument
Knoxville, Tennessee
(865) 392-4600
www.proteaninstrument.com



February 28, 2013

Dave Rousseau

Colorado State University

The Board of Governors of the Colorado State University System
on recommendation of the Faculty has conferred upon

Christopher J. Pedersen

the Degree of

Master of Science

Radiological Health Sciences

Given under the seal of Colorado State University at Fort Collins, Colorado
this twelfth day of May, two thousand and twelve.

President of the University

Dean of the Graduate School

Chair of the Board

Colorado State University

The Board of Governors of the Colorado State University System
on recommendation of the Faculty has conferred upon

Christopher John Pedersen

the Degree of

Bachelor of Science

Environmental Health

Given under the seal of Colorado State University at Fort Collins, Colorado
this seventeenth day of December, two thousand and eleven.

Anthony A. Frank
President of the University

Dean of the College of Veterinary Medicine
and Biomedical Sciences

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Chair of the Board