



# Department of Environmental Quality



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

Matthew H. Mead, Governor

Todd Parfitt, Director

December 31, 2014

AUC LLC, Reno Creek  
Mr. James Viellenave  
1536 Cole Blvd., Suite 230  
Lakewood, CO 80401

**Re: Reno Creek ISR Project Application for a Permit to Mine, TFN 5 4/150, Round 5 Technical Review**

Dear Mr. Viellenave,

The DEQ Land Quality Division (LQD) and Water Quality Division (WQD) District 3 staff has reviewed AUC's responses to LQD's Round 4 Technical Review comments. Enclosed are two memorandums, one containing LQD's technical review comment and one containing WQD's technical review comments for the Reno Creek ISR Project Application for a Permit to Mine. The Round 5 Technical Review has found that the application is *Technically Incomplete* for the purpose of W.S. § 35-11-406(h).

Please direct all comments to the LQD District 3 office in Sheridan. If you have any questions, regarding LQD's review, please contact me at the LQD Sheridan Office, 307-675-5619. If you have any questions regarding WQD's comments, please contact Don Fischer at the WQD Sheridan Office, 307-675-5640.

Respectfully,

Luke McMahan  
Project Geologist

\lm

Enc.: LQD Round 5 Technical Review Memorandum  
cc: LQD Cheyenne File w/ attachments  
Chad Glenn, Document Processing Center, NRC, 11545 Rockville Pike, Rockville, MD.  
20852 w/ attachments

NMSS 20

WTE  
1/5/15





WYOMING

MEMORANDUM

TO: File: TFN 5 4/150; AUC, Reno Creek ISR Project

FROM: Luke McMahan, Permit Coordinator/Project Geologist, District III LM

DATE: December 31, 2014

SUBJECT: Round 5 Technical Review Comments, Permit to Mine Application for AUC LLC's Reno Creek ISR Project, Campbell County, Wyoming

DISCUSSION:

Land Quality Division (LQD) District III received the subject application on January 24, 2013 under cover letter dated January 21, 2013 from Mr. Viellenave, President of AUC LLC. The Application was determined to be complete per LQD's April 4, 2013 letter to Mr. Viellenave notifying AUC that the Application was Complete and Suitable For First Publication as per W.S. § 35-11-406(g).

LQD Round 5 Technical Review – This Memorandum, dated December 31, 2014 provides the results from LQD's review of the Round 4 Technical Comment Response Package (CD-ROM) received by LQD District 3 on December 2<sup>nd</sup> 2014. The following comment is from LQD's Round 5 Technical Review of the subject Application.

REVIEW COMMENT:

1. Adjudication, Form 1 and Form 3; per AUC's 12/1/2014 notification letter, AUC has changed their address and therefore submitted a revised Form 1 and Form 3 for the Reno Creek Permit to Mine Application. The original hard copy forms were delivered to the Cheyenne District 1 LQD office under cover letter dated December 1, 2014 (copies received in District 3 office on 12/8/14). However, electronic copies of these updated forms (dated December 2, 2014) were not inserted into the Adjudication of the November 2014 Application CD. **Please revise the Application with the updated copies of Form 1 and Form 3.**

SUMMARY:

As indicated in the comment above, a revised Form 1 and Form 3 must be inserted in the Application before this application may be declared technically adequate.

\lm

cc: LQD Cheyenne



## MEMORANDUM

To: Luke McMahan, LQD Project Geologist

From: Don Fischer, North District Geologic Supervisor, WQD Groundwater Section

Date: December 30, 2014

Subject: Comments, Appendix D12/Statement of Basis; AUC LLC, Reno Creek ISR Project, LQD Permit to Mine Application, TFN 5 4/150

The D12 Statement of Basis is a compilation of data and information necessary to support an aquifer exemption request to the USEPA. The Water Quality Division (WQD), Groundwater Section will propose to reclassify the groundwater to Class V Mineral Commercial based on the D12 materials. The USEPA has the authority to issue or deny the aquifer exemption request from the WDEQ.

The Statement of Basis will be submitted by the WQD to the USEPA as the justification for the mineral commercial groundwater classification. Because there are policies and issues that are still being resolved and/or clarified within the department, the WQD is requesting an electronic version of the D12 materials in Word format in order to effect changes as needed in the document to meet current rules, regulations, and policies before submission to the USEPA.

LQD and the ISR operator will receive a final copy of the Statement of Basis for groundwater reclassification upon completion.

Thank You.

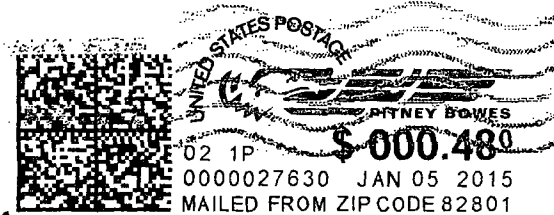
Cc: AUC ISR file

Miles Bennett, ISR Coordinator, LQD

STATE OF WYOMING  
DEPARTMENT OF ENVIRONMENTAL QUALITY

2100 West 5<sup>th</sup> Street  
SHERIDAN, WY 82801

05 JAN 2015



Chad Glenn  
Document Processing Center, NRC  
11545 Rockville Pike  
Rockville, MT 20852

2085232746

