

**From:** [Scott Schierman \(USA - Casper\)](#)  
**To:** [Luke McMahan \(luke.mcmahan@wyo.gov\)](#); [Linton, Ron](#)  
**Cc:** [Evans, Robert](#)  
**Subject:** [External\_Sender] RE: Update to MIT Testing at Willow Creek  
**Date:** Monday, May 08, 2017 3:09:20 PM  
**Attachments:** [image006.png](#)  
[image008.png](#)  
[image001.png](#)  
[image004.png](#)

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Luke and Ron

FYI. As an update to the MIT sampling for Willow Creek we continue to be in compliance with the 5 year sampling frequency and are currently sampling the final 2 wells due on May 14, 2017 today. Provided we get good weather this week we should be pretty close to finishing up all the May MITs. We have 39 wells left to MIT for May. June is a lighter month at 64 MITs and would expect weather to improve and not be an issue. Please find the table provided below that gives a breakdown of MIT sampling for May 2017.

May Breakdown	To Do	Done	%	Left
May 1 thru May 7	46	46	100.0%	0
May 8 thru May 14	49	47	95.9%	2
May 15 thru May 21	28	13	46.4%	15
May 22 thru May 31	32	10	31.3%	22
Total left				39

I think we are over the hump on getting back on track with MIT sampling and issues with weather delays.

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**From:** Scott Schierman (USA - Casper)  
**Sent:** Thursday, April 20, 2017 3:11 PM  
**To:** Luke McMahan (luke.mcmahan@wyo.gov) <luke.mcmahan@wyo.gov>; Linton, Ron (Ron.Linton@nrc.gov) <Ron.Linton@nrc.gov>  
**Cc:** 'Robert.Evans@nrc.gov' <Robert.Evans@nrc.gov>  
**Subject:** FW: MIT Testing at Willow Creek

Luke and Ron

As discussed with you on April 19 and 20, 2017 Uranium One is currently in compliance with maintaining the 5-year MIT testing. We are about 2 weeks ahead of schedule on MIT well testing for our Willow Creek project. We have been trying to keep about 1-2 months ahead of MIT due dates in anticipation of weather delays but this cushion has been eroded

down to about two weeks because of inclement weather conditions. We are trying to get into the field when weather permits. Next week is calling for additional inclement weather that will limit our ability to get into the wellfield to perform MIT testing.

Uranium One has completed all (172) MITs due for April 2017, and have (37) of the 155 scheduled wells for MITs completed for May 2017. Of the 37 completed for May 2017 only about 14 of the wells that are currently tested for MITs that fall within the first week of May which has approximately 50 wells that need MIT testing to remain on schedule. For the period from January 2017 through April 2017, U1 has completed MIT testing on 428 wells.

Monthly Breakdown MITs			
Jan. 2017	<b>40</b>	40	100.0%
Feb. 2017	<b>73</b>	73	100.0%
Mar. 2017	<b>106</b>	106	100.0%
Apr. 2017	<b>172</b>	172	100.0%
May. 2017	<b>155</b>	37	23.9%
Total	<b>546</b>	428	78.4%

  

May Breakdown	To Do	Done	%
May 1 thru May 7	46	12	26.1%
May 8 thru May 14	49	12	24.5%
May 15 thru May 21	28	9	32.1%
May 22 thru May 31	32	4	12.5%

Since it appears we will have only limited access due to weather constraints for the next couple of weeks Uranium One would propose that this timeframe be focused on performing MITs for the injection wells that are due for MIT as access permits. If recovery wells are not tested exactly within the five year MIT timeframe (May 7, 2012 initial test date and re-tested let's say for discussion purposes on May 15, 2017) will that be a compliance issue with WDEQ or NRC?

For NRC purposes, should we have a well that falls outside the 5 year MIT schedule, as discussed with Ron Linton, U1 will address this as a self-identified violation and have this record available for the next NRC inspection. For WDEQ reporting purposes Uranium One will document time periods when access to perform MITs have been delayed due to weather constraints and include this information in the quarterly reports submitted to WDEQ if any wells exceed the five year MIT timeframe. Additionally, any of these sampling delays will be recorded on the 2017 MIT schedule for any wells that exceed the five year MIT timeframe.

Uranium One will make every effort to ensure that all wells are tested prior to the five year MIT timeframe, and at the present time we do not have any issue with wells that have exceeded the five year MIT testing schedule as we are completed through April 2017 with MIT testing. It is the intent of Uranium One to be transparent with the WDEQ and NRC regarding this matter and take a proactive approach to prioritizing 5 year MITs by targeting injection wells to ensure they are completed on schedule. It is the intent of Uranium One to have all the wells tested within the 5 year MIT framework but this may become an issue in the next couple of weeks with weather related access issues.

In Summary:

- To date, Uranium One has met the five year MIT schedule for wells;
- Currently 2 weeks ahead on MIT sampling;
- Will prioritize injection wells for MIT, if weather puts testing behind scheduled MIT date;
- Uranium One's intent is to maintain compliance and MIT all wells within 5 year timeframe;
- Document any weather delays that cause 5 year schedule to be exceeded in the 2<sup>nd</sup> quarter report should this occur;
- Should 5 year MIT schedule be exceeded Uranium One will document as a self-identified violation for NRC purposes.

If you have any questions or need additional information regarding this potential issue, please let me know.

Regards,

**Scott Schierman** | HSE Manager

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