



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION  
P.O. Box 968, Santa Fe, New Mexico 87504-0968  
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STEVEN ASHER, Director

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GOVERNOR

JOSEPH GOLDBERG  
SECRETARY  
Ted Guambana  
DEPUTY SECRETARY

JOSEPH F. JOHNSON  
DEPUTY SECRETARY

M E M O R A N D U M

TO: Felix Miera, Program Manager  
Uranium Licensing Section

FROM: *FRM*  
*SW* Sam Simpson, Uranium Licensing Section

DATE: July 3, 1984

SUBJECT: Renewal of Mobil's Section 9 Radioactive Material License

Mobil Oil Corporation requested renewal of their Section 9, Pilot R&D In-Situ Uranium Solution Mining, Radioactive Material License, which expired December 31, 1983.

All uranium leaching had terminated in October 1980, and aquifer restoration was undertaken to demonstrate the capability to restore to baseline or Water Quality Control Commission standards. Mobil is currently engaged in a clean water recycle program and expects all parameters, except molybdenum, to be restored to required concentration levels. The request for license renewal is in support of these restoration efforts. Section 9 has already been incorporated into the commercial mining plan for the South Trend Development Area Project (STDA). A Radioactive Material License was issued in March 1983 for the STDA and further leaching at the Section 9 site is envisioned to be conducted under the STDA license.

Mobil's renewal application updated their original Section 9 Mining and Reclamation Plan and provided an estimated cost of \$790,000 for restoration of Section 9. Self-insurance surety arrangements were requested in accordance with provisions of Section 3-315 of the New Mexico Radiation Protection Regulations. Mobil Corporation's financial position meets the qualification criteria of our regulations for approval of the self-insurance mechanism.

Public notices were published in seven New Mexico newspapers during the December 19-23, 1983 time period (Ref. Attach). No written comments or requests for a public hearing were received from any member of the public. The renewal of the groundwater discharge permit (DP-26) was approved by the EID on April 9, 1984.

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PDR ADOCK 04008911  
C PDR

The renewal application has been evaluated and in my opinion there is no technical reason to deny the issuance of Mobil's Radioactive Material License (RML). Therefore recommend the renewal of the RML, with conditions, to expire June, 30, 1989 or sooner depending on initiation of leaching within the South Trend Development Area zone. The renewal license with conditions, and the rationale for imposing such conditions, is enclosed for your review and consideration.

SS/cvg



RADIOLOGICAL MEASUREMENTS, MOBIL'S SECTION 9,  
PILOT IN-SITU PROJECT

The quarterly submission of radiological monitoring data, by Mobil Oil Corporation to the Radiation Protection Bureau, for Radon, Radon Progeny, Groundwater Radionuclides, Direct Gamma Surveys, Alpha Contamination and Air Particulate measurements are at or near baseline levels. These results are consistent with Mobil's current mode of operation at Section 9 whereby all uranium leaching operations were terminated October, 1980 and restoration of the aquifer was undertaken to restore groundwater quality to either New Mexico Water Quality Control Commission standards or baseline. As the leaching phase was terminated it had been anticipated that radiological measurements would trend toward background levels. A comparison of January, 1984 and Jul, 1981 radiological measurements essentially confirm these assumptions, therefore renewal of Mobil's Section 9 Radioactive material License will not adversely affect public health or safety. The data listed below was extracted from Mobil's January, 1984 and July, 1981 submissions:

a. Radon: .16 $\pm$ .09 pCi/l upwind (u/w) .21 $\pm$ .58 pCi/l (u/w)  
.18 $\pm$ .14 downwind (d/w) 1/84; .34 $\pm$ .39 pCi/l d/w 7/81  
Baseline: .5 $\pm$ .2 pCi/l (u/w)  
.6 $\pm$ .5 pCi/l (d/w)

b. Radon Progeny (Top of ION Exchange Column): .03 $\pm$ .09 DPM/l,  $2 \times 10^{-4}$  WL,  
1/84; .42 $\pm$ .49 DPM/l,  $4.2 \times 10^{-3}$  (WL), 7/81  
Baseline: 1.11 $\pm$ .24 DPM/l,  $10.9 \times 10^{-3}$  WL

c. Gamma Survey (Overall Site Area): .034 mR/hr, 34 readings, 1/84; .028  
mR/hr, 11 readings, 7/81.  
Baseline: 9 readings, .03 mR/hr.

d. Groundwater Radionuclides: Well #221

<u>Baseline</u>	<u>January 1984</u>	<u>July 1981</u>
Ra-226: 3.3 $\pm$ .8 pCi/l	.00 $\pm$ . 4 pCi/l,	4.1 $\pm$ 1.9 pCi/l
Th-230: .0 $\pm$ .5 pCi/l	.00 $\pm$ . 4 pCi/l,	.1 $\pm$ .4 pCi/l
Pb-210: 2.7 $\pm$ 3.7 pCi/l	.00 $\pm$ . 2 pCi/l,	-0.4 $\pm$ 3.5 pCi/l
Unat: .002mg/l	.002 mg/l,	.001 mg/l

e. Particulate Gross Alpha (Yellowcake Handling Area): .01 $\pm$ .01 pCi/m<sup>3</sup>, 1/84'  
.05 $\pm$ .02 pCi/m<sup>3</sup>, 7/81  
Baseline: .01 $\pm$ .01 pCi/m<sup>3</sup>

f. Continuous radon measurements taken by EID on May 14-18, 1984 with an RGM-1 reflect an average reading of .2 pCi/l.

# Affidavit of Publication

## LEGAL NOTICE

### PUBLIC NOTICE ENVIRONMENTAL IMPROVEMENT DIVISION RADIATION PROTECTION BUREAU

The Environmental Improvement Division (EID) has received an application for renewal of a Radioactive Material License (NM-MOB-UL-00) from Mobil Alternative Energy Inc., P.O. Box 17772, Denver, Colorado, 80217, to continue to engage in aquifer restoration efforts with no resumption of uranium leach mining at the Pilot R & D operation located at Section 8, T17N, R13W, McKinley County, New Mexico.

During the review of the renewal application, the Division can invite several state and federal agencies as well as other interested parties to review and comment on the renewal application. Various sections within EID will review and comment upon the application. The EID may, at its discretion, retain consultants to assist in its evaluation of the renewal application. Relevant comments and questions received by the EID from various agencies and interested parties will be forwarded to the applicant for its response. Correspondence associated with the application will be on file with the Radiation Protection Bureau and will be available for inspection by the applicant and any other interested parties.

The Division has already required the company to provide, during the submission of the original application, complete plans and other materials concerning, among other things, the impact on public health, safety and environmental aspects of the proposed activity.

The request for renewal will be analyzed carefully by the Division. During this analysis, the application will be carefully reviewed to ensure that there are no deficiencies, that the renewal application meets all applicable requirements and that there is no reason to believe that the uranium leaching facility will violate any laws or regulations. If the Division is so satisfied, it will issue a renewal Radioactive Material License, to expire five years from the date of issuance.

The activities of all licensees are inspected periodically to assure compliance with regulations and license conditions.

The renewal application is available for review at the following locations:

#### Santa Fe:

EID Central Office  
Radiation Protection Bureau  
725 St. Michael's Drive-Crown Building  
Hours: Monday-Friday, 8:00 a.m.-4:00 p.m.

#### Albuquerque:

EID District 1 Office  
4218 Montgomery Blvd., N.E.  
Hours: Monday-Friday, 8:00 a.m.-4:00 p.m.

#### Milan:

EID District 1 Office  
708 Uranium Avenue  
Milan, New Mexico  
Hours: Monday-Friday 8:00 a.m.-4:00 p.m.

It is anticipated that the review period will require about two months. Written comments and requests for public hearing will be accepted for 30 days after publication of this notice.

Written comments regarding this license renewal application should be directed to the Uranium Licensing Section, Radiation Protection Bureau, Environmental Improvement Division, P.O. Box 962, Santa Fe, New Mexico 87504-0962.

Legal #10125 Published in the Gallup Independent Monday December 19, 1983

STATE OF NEW MEXICO.

1 ss

COUNTY OF MCKINLEY

Donna Huber being duly sworn upon oath, deposes and says:

As legal clerk of the Gallup Independent, a newspaper published in and having a general circulation in McKinley County, New Mexico, and in the City of Gallup, therein: that this affiant makes this affidavit based upon personal knowledge of the facts herein sworn to. That the publication, a copy of which is hereto attached was published in said newspaper during the period and time of publication and said notice was published in the newspaper proper, and not in a supplement thereof,

for one time, the first publication being on the

19 day of December, 1983 the

second publication being on the day of

19 the third publication

on the day of 19

and the last publication being on the day of

19

That such newspaper, in which such notice or advertisement was published, is now and has been at all times material hereto, duly qualified for such purpose, and to publish legal notices and advertisements within the meaning of Chapter 12, of the statutes of the State of New Mexico, 1941 compilation.

Affiant.

Sworn and subscribed to before me this 19 day of

December, A.D., 1983

Notary Public.

My commission expires

8-27-85



PUBLIC NOTICE  
ENVIRONMENTAL IMPROVEMENT DIVISION  
RADIATION PROTECTION  
BUREAU

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EID Central Office  
Radiation Protection Bureau  
725 S. Mountain Drive - Crown Building

Hours: Monday-Friday, 8:00 a.m. - 5:00 p.m.

Albuquerque  
EID District Office  
4215 Montgomery Blvd., N.E.  
Hours: Monday-Friday, 8:00 a.m. - 5:00 p.m.

Milan  
EID District Office  
708 Uranium Avenue  
Milan, New Mexico  
Hours: Monday-Friday, 8:00 a.m. - 5:00 p.m.

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Written comments regarding this license renewal application should be directed to the Uranium Licensing Section, Radiation Protection Bureau, Environmental Improvement Division, P.O. Box 74, Santa Fe, New Mexico 87504-0074.

Sandoval County Times-Independent  
Dec. 23, 1993

# AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO  
COUNTY OF SANDOVAL

SS.

Maria S. Sandoval being duly sworn declares and says that she is the Publishing Director of The Sandoval County Times Independent, a newspaper published in and having a general circulation in the Town of Bernalillo, County of Sandoval and State of New Mexico and duly qualified for that purpose with the meaning of The Publication of Notice, Act, Section 14-11-1 et seq; N.M.S.A. 1978 comp; that the publication, a copy of which is hereto attached, was published in said newspaper in the regular edition and entire issue of every number of the paper during the period and time of publication, and that the notice was published in the newspaper proper and not in a supplement.

for ..... consecutive weeks the first publication being on the

..... day of ..... 19..... and the subsequent

publications on ..... 19.....

and that payment therefor has been made or assessed as court costs.

Sworn and subscribed to before me, a Notary

Public this ..... day of ..... 19.....

Notary Public

My commission expires ..... 19.....