

CROW BUTTE RESOURCES, INC.
216 SIXTEENTH STREET, SUITE 810
DENVER, COLORADO 80202

(303) 825-2266
(303) 825-1544 FAX

October 31, 1997

Mr. Joseph J. Holonich, Chief
Uranium Recovery Branch
Division of Waste Management,
NMSS (T-7-J9)
Office of Nuclear Material Safety
and Safeguards
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20850

RE: Docket No. 40-8943
License No. SUA-1534
1998 Surety Estimate - Revision 2

Dear Mr. Holonich:

Enclosed is Revision 2 of the annual surety estimate for the Crow Butte Mine. The revised estimate includes a change to the flow capacity of the reverse osmosis unit in the Groundwater Restoration section. The change was noted during the review process by the Nebraska Department of Environmental Quality.

The revised surety estimate amount for Revision 2 is \$8,767,763.

If you have any questions regarding the revised estimate, please contact me.

Sincerely,

Stephen P. Collings

Stephen P. Collings
President

SPC/sm
Enclosure

cc: Mr. Ross Scarano
Mr. Frank Mills, NDEQ

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CROW BUTTE RESOURCES, INC.
CROW BUTTE IN-SITU MINE
10-31-97 (Revision 2)
1998 RESTORATION/RECLAMATION SURETY COST ESTIMATE

SUMMARY

A.	Groundwater Restoration	\$4,159,728
B.	Wellfield Reclamation	1,908,992
C.	Commercial Plant Reclamation/Decommissioning	338,182
D.	R.O. Building Reclamation/Decommissioning	49,733
E.	Evaporation Pond Reclamation	407,080
F.	Miscellaneous Site Reclamation	60,816
G.	Deep Disposal Well Reclamation	63,213
H.	I - 196 Brule Aquifer Restoration	<u>26,466</u>
	Subtotal	\$7,014,210
I.	Contract Administration (10%)	701,421
J.	Contingency (15%)	<u>1,052,132</u>
	TOTAL	\$8,767,763

BASIS OF COSTS:

Costs used in the surety bond calculations are based on the following rationale:

1. Labor Rates: Labor rates are based on 1997 actual CBR labor for plant and wellfield operations including benefits and payroll taxes, plus 20% for contractors overhead and profit.
2. Disposal Costs: Disposal costs of byproduct material are based on a current disposal agreement held by CBR.

	<u>Fee</u>	<u>Transport Cost</u>	<u>Total</u>
Packaged Material	\$10.00/cf	\$2.42/cf	\$12.42/cf
Soil, etc.	\$81.00/cy	\$66.00/cy	\$147.00/cy

Disposal of non-byproduct material will be at a licensed landfill per NDEQ permit. \$10 load fee plus transport cost of \$360/20 tons @ 30 miles.

3. Power Costs: Based on actual 1997 power costs including demand factor, energy charge, taxes, and service fees, \$0.05/Kw-hr.
4. Equipment Costs:

<u>Equipment</u>	<u>Base(1) Rental Cost (\$/hr)</u>	<u>Labor Cost (\$/hr)</u>	<u>Oper. Cost (\$/hr)</u>	<u>Fuel(2) Cost (\$/hr)</u>	<u>Mob. & (3) Demob (\$/hr)</u>	<u>Total (\$/hr)</u>
IT12 Loader	20	17	9	4	2	52
Shredder	12	--	--	incl.	incl.	12
Bulldozer (D8N)	83	17	19	12	2	133
Smeal	41	incl.	incl.	incl.	incl.	41
Mixing Unit	12	--	--	incl.	incl.	12

- (1) From Nebraska Machinery rental rates for IT12 and D8N. Shredder and mixing units are estimates.
- (2) From Caterpillar Handbook, Edition: 19 fuel consumption using \$1.00/gal for diesel cost.
- (3) Based on \$2.08/mile at 90 miles one way x 2 trips/176 hours.

A. GROUNDWATER RESTORATION

Restoration costs are based on restoring Mine Units (MU) 1, 2, 3, 4, 5 and 6. MU-1, 2, 3, 4 and 5 are based on actual installed information. Construction of MU-6 is underway.

Mine Unit	Thickness (ft)	No. Patterns	Pattern Size (ft ²)	Porosity	Pore Volume (gals)	Mine Unit Total Area (Acres)
MU-1	19.6	38	10,624	0.29	17,165,000	9.3
MU-2	16.3	52	9,800	0.29	18,018,500	11.7
MU-3	12.8	57	10,284	0.29	15,447,280	13.4
MU-4	13.0	96	10,765	0.29	29,142,600	23.7
MU-5	15.0	183	7,557	0.29	44,997,809	31.8
MU-6	20.0	175	10,000	0.29	75,922,000	40.2

MU-1

- 1) Remove 1 pore volumes (PV) groundwater transfer/sweep.
- o Produce at 1,150 gpm with (36) 32 gpm downhole pumps (5 HP).
 - o Total horsepower = 180 HP
 - o Time to do work:
 $1 \text{ PV} \times 17,165,000 \text{ gal/PV} \times 1 \text{ min}/1,150 \text{ gal} \times 1 \text{ hour}/60 \text{ min} = 249 \text{ hours}$
 - a. Power Cost:
 $249 \text{ hours} \times 180 \text{ HP} \times .75 \text{ Kw/HP} \times \$0.05/\text{Kw-hr} = \$1,681$
 - b. Labor Cost:
 $249 \text{ hours} \times 2 \text{ man-day}/8 \text{ hours} \times \$136/\text{man-day} = \underline{8,466}$
- \$10,147
- or \$0.59/1000 gal
- 2) Treat 4 PV with R.O. and re-inject permeate using a 300 gpm R.O. unit.
- o $4 \text{ PV} \times 17,165,000 \text{ gal/PV} \times 1 \text{ min}/300 \text{ gal} \times 1 \text{ hr}/60 \text{ min} = 3,814 \text{ hours}$
 - a. Power cost:
 Downhole pump HP
 $300 \text{ gpm}/32 \text{ gpm/pump} \times 5 \text{ HP/pump} = 47 \text{ HP}$
 Injection Pump = 25 HP
 R.O. System
 R.O. Unit pump = 123 HP
 Permeate pump = 40 HP
 Waste pump = 8 HP
 243 HP

 $3,814 \text{ hrs} \times 243 \text{ HP} \times .75 \text{ Kw/HP} \times \$0.05/\text{Kw-hr} = \$34,755$
 - b. Chemical Cost:
 Antiscalant: $\$31/\text{gal} \times 0.20 \text{ gal/hr} \times 3,814 \text{ hrs} = 23,647$
 Reductant: $\$0.35/\text{lb} \times 0.56 \text{ lb Na}_2\text{S}/1000 \text{ gal} \times 4 \text{ PV} \times 17,165,000 \text{ gal/PV} = 13,457$
 - c. Labor Cost:
 $3,814 \text{ hrs} \times 2 \text{ man-day}/8 \text{ hours} \times \$136/\text{man-day} = \underline{\$129,676}$
 Total

\$201,535

or \$2.94/1,000 gal
- 3) Recirculate 1 PV with reductant @ 1,150 gpm.
- a. Power Cost:
 (36) 5 HP downhole pumps = 180 HP
 (1) Injection pump = 30 HP
 Total HP = 210 HP
 $210 \text{ HP} \times 249 \text{ hrs} \times .75 \text{ Kw/HP} \times \$0.05/\text{Kw-hr} = \$1,961$
 - b. Chemical Cost:
 $1 \text{ PV} \times 17,165,000 \text{ gal/PV} \times 0.56 \text{ lb Na}_2\text{S}/1000 \text{ gal} \times \$0.35/\text{lb} = 3,364$
 - c. Labor Cost: (see above) 8,466
 Total

\$13,791

or \$0.80/1000 gal

4) Spare parts, filters, consumables, etc. for items 1-4 above are estimated to be \$16,468/yr.		
o Time to do work is 3,358 hours/24 hours = 140 days		
a. \$16,468/yr x 140/365=		\$6,316
5) Sampling and Monitoring.		
o Number of wells to be sampled are a minimum of 10 per mine unit or 1/acre plus any monitor wells on excursion.		
a. Sample prior to restoration:		
10 wells x \$150/well (32 parameter suite) =	\$1,500	
b. Phase 1 sampling (GW transfer/sweep):		
10 wells x \$47/well (6 parameters) x 1 month =	470	
c. Phase 2 sampling (4PV R.O., 1PV reductant):		
10 wells x \$150/well x 6 months =	9,000	
d. Phase 3 sampling (stabilization):		
10 wells x \$150/well x 6 months =	9,000	
e. Monitor well sampling:		
14 wells x 2 samples/month x \$47/well x 5 months =	6,580	
f. Other lab analysis (radon, urinalysis, etc):		
\$806/month x 5 months =	<u>4,030</u>	
Total sampling and monitoring		\$ 30,580
6) Supervisory labor for restoration work (including 33% overhead factor)		
a. (1) Engineer \$6,256/month x 7 months =	\$43,792	
b. (1) Radiation Technician \$5,212/month x 7 months =	<u>36,484</u>	
(Operator wages included in above calculations)		
		<u>\$ 80,276</u>
MU-1 TOTAL		\$342,645

MU-2

1)	Remove 1 PV, gw transfer/sweep.	
o	1 PV x 18,018,500 gal/PV x 1 min/1,150 gal x 1 hr/60 min = 261 hours	
a.	1 PV x 18,018,500 gal/PV x \$0.59/1000 gal =	\$10,631
2)	Treat 4 PV with R.O. and inject permeate.	
o	4PV x 18,018,500 gal/PV x 1 min/300 gal x 1 hr/60 min = 4,004 hours	
a.	4 PV x 18,018,500 gal/PV x \$2.94/1000 gal =	\$211,898
3)	Recirculate 1 PV with reductant.	
o	Time = 261 hours	
a.	1PV x 18,018,500 gal/PV x \$0.80/1000 gal =	\$14,415
4)	Spare parts, etc.	
o	Total time to do work = 147 days	
a.	\$16,468/yr x 147/365 =	\$6,632
5)	Sampling and monitoring - 12 restoration wells plus 14 monitor wells.	
a.	Sample prior to restoration: 12 wells x \$150/well (32 parameter suite) =	\$1,800
b.	Phase 1 sampling (gw transfer/sweep): 12 wells x \$47/well x 1 month (6 parameters) =	564
c.	Phase 2 sampling (4PV R.O., 1PV reductant) 12 wells x \$150/well x 6 months =	10,800
d.	Phase 3 sampling (stabilization): 12 wells x \$150/well x 6 months =	10,800
e.	Monitor well sampling: 14 wells x 2 samples/month x \$47/well x 5 months =	6,580
f.	Other lab analysis (radon, urinalysis, etc) \$806/month x 5 months =	<u>4,030</u>
		\$34,574
7)	Supervisory Labor (same as MU-1).	<u>\$80,276</u>
	MU-2 TOTAL	\$358,426

MU-3

1)	Remove 1 PV, gw transfer/sweep.		
o	1 PV x 15,447,280 gal/PV x 1 min/1,150 gal x 1 hr/60 min = 224 hours		
a	1 PV x 15,447,280 gal/PV x \$0.59/1000 gal =		\$9,114
2)	Treat 4 PV with R.O. and inject permeate.		
o	4PV x 15,447,280 gal/PV x 1 min/300 gal x 1 hr/60 min = 3,433 hours		
a	4 PV x 15,447,280 gal/PV x \$2.94/1000 gal =		\$181,660
3)	Recirculate 1 PV with reductant.		
o	Time = 224 hours		
a	1PV x 15,447,280 gal/PV x \$0.80/1000 gal =		\$12,358
4)	Spare parts, etc.		
o	Total time to do work = 126 days		
a	\$16,468/yr x 126/365 =		\$5,685
5)	Sampling and monitoring 18 restoration wells plus 14 monitor wells.		
a	18 wells x \$150/well =	\$2,700	
b	18 wells x \$47/well x 1 months =	846	
c	18 wells x \$150/well x 5 months =	13,500	
d	18 wells x \$150/well x 6 months =	16,200	
e	14 wells x 2 samples/month x \$47/well x 5 months =	6,580	
f	Other lab: \$806/month x 5 months =	<u>4,030</u>	
	Total		\$43,856
6)	Supervisory Labor.		
a	(1) Engineer \$6,256/month x 6 months =	\$37,536	
b	(1) Radiation Technician \$5,212/month x 6 months =	<u>31,272</u>	
	(Operator wages included in above calculations)		
			<u>\$ 68,808</u>

MU-3 TOTAL**\$321,481**

MU-4

1)	Remove 1 PV, gw transfer/sweep.		
o	1 PV x 29,142,600 gal/PV x 1 min/1,150 gal x 1 hr/60 min = 422 hours		
a.	1 PV x 29,142,600 gal/PV x \$0.59/1000 gal =		\$17,194
2)	Treat 4 PV with R.O. and inject permeate.		
o	4PV x 29,142,600 gal/PV x 1 min/300 gal x 1 hr/60 min = 6,476 hours		
a.	4 PV x 29,142,600 gal/PV x \$2.94/1000 gal =		\$342,717
3)	Recirculate 1 PV with reductant.		
o	Time = 422 hours		
a.	1PV x 29,142,600 gal/PV x \$0.80/1000 gal =		\$23,314
4)	Spare parts, etc.		
o	Total time to do work = 237 days		
a.	\$16,468/yr x 237/365 =		\$10,693
5)	Sampling and monitoring 25 restoration wells plus 18 monitor wells.		
a.	25 wells x 150/well=	\$3,750	
b.	25 wells x 47/well x 1 months=	1,175	
c.	25 wells x 150/well x 9 months=	33,750	
d.	25 wells x 150/well x 6 months=	22,500	
e.	18 wells x 2 samples/month x 47/well x 8 months =	13,536	
f.	Other lab: \$806/month x 8 months=	<u>6,448</u>	
			\$81,159
6)	Supervisory Labor:		
a.	(1) Engineer: \$6,256/month x 10 months=	\$62,560	
b.	(1) Radiation Technician: \$5,212/month x 10 months (Operator wages included in above calculations)	<u>52,120</u>	
			<u>\$114,680</u>
	MU-4 TOTAL		\$589,757

MU-5

- | | | | |
|----|---|---------------|------------------|
| 1) | Remove 1 PV, gw transfer/sweep. | | |
| o | 1 PV x 44,997,809 gal/PV x 1 min/1,150 gal x
1 hr/60 min = 652 hours | | |
| a. | 1 PV x 44,997,809 gal/PV x \$0.59/1000 gal = | | \$26,549 |
| 2) | Treat 4 PV with R.O. and inject permeate. | | |
| o | 4PV x 44,997,809 gal/PV x 1 min/300 gal x
1 hr/60 min = 10,000 hours | | |
| a. | 4 PV x 44,997,809 gal/PV x \$2.94/1000 gal = | | \$529,174 |
| 3) | Recirculate 1 PV with reductant. | | |
| o | Time = 652 hours | | |
| a. | 1PV x 44,997,809 gal/PV x \$0.80/1000 gal = | | \$35,998 |
| 4) | Spare parts, etc. | | |
| o | Total time to do work = 367 days | | |
| a. | \$16,468/yr x 367/365 = | | \$16,558 |
| 6) | Sampling and monitoring 33 restoration wells plus
52 monitor wells. | | |
| a. | 33 wells x \$150/well= | \$4,950 | |
| b. | 33 wells x \$47/well x 1 months= | 1,551 | |
| c. | 33 wells x 150/well x 14 months= | 69,300 | |
| d. | 33 wells x 150/well x 6 months= | 29,700 | |
| e. | 52 wells x 2 samples/month
x 47/well x 12 months = | 58,656 | |
| f. | Other lab: \$806/month x 12 months= | <u>9,672</u> | |
| | | | \$173,829 |
| 7) | Supervisory Labor: | | |
| a. | (1) Engineer: \$6,256/month x 15 months= | \$93,840 | |
| b. | (1) Radiation Technician: \$5,212/month
x 15 months (Operator wages included
in above calculations) | <u>78,180</u> | |
| | | | <u>\$172,020</u> |

MU-5 TOTAL**\$954,128**

MU-6

- | | | |
|----|---|------------------|
| 1) | Remove 1 PV, gw transfer/sweep. | |
| o | 1 PV x 75,922,000 gal/PV x 1 min/1,150 gal x
1 hr/60 min = 1,100 hours | |
| a. | 1 PV x 75,922,000 gal/PV x \$0.59/1000 gal = | \$44,794 |
| 2) | Treat 4 PV with R.O. and inject permeate. | |
| o | 4PV x 75,922,000 gal/PV x 1 min/300 gal x
1 hr/60 min = 16,872 hours | |
| a. | 4 PV x 75,922,000 gal/PV x \$2.94/1000 gal = | \$892,843 |
| 3) | Recirculate 1 PV with reductant. | |
| o | Time = 1,100 hours | |
| a. | 1PV x 75,922,000 gal/PV x \$0.80/1000 gal = | \$60,738 |
| 4) | Spare parts, etc. | |
| c | Total time to do work = 619 days | |
| a. | \$16,468/yr x 619/365 = | \$27,928 |
| 6) | Sampling and monitoring 33 restoration wells plus
52 monitor wells. | |
| a. | 33 wells x \$150/well= | \$4,950 |
| b. | 33 wells x \$47/well x 2 months= | 3,102 |
| c. | 33 wells x 150/well x 24 months= | 118,800 |
| d. | 33 wells x 150/well x 6 months= | 29,700 |
| e. | 52 wells x 2 samples/month
x 47/well x 20 months = | 97,760 |
| f. | Other lab: \$806/month x 18 months= | <u>14,508</u> |
| | | \$268,820 |
| 7) | Supervisory Labor: | |
| a. | (1) Engineer: \$6,256/month x 26 months= | \$162,656 |
| b. | (1) Radiation Technician: \$5,212/month
x 26 months (Operator wages included
in above calculations) | <u>135,512</u> |
| | | <u>\$298,168</u> |

MU-6 TOTAL**\$1,593,291****TOTAL MU-1, 2, 3, 4, 5 and 6 RESTORATION COST****\$4,159,728**

B. WELLFIELD RECLAMATION

Wellfield Reclamation costs are based on removing and disposing of the wellfield pipe at a licensed facility. The soil around the production wells will also be removed and disposed of at a licensed facility.

Mine Unit	2" Prod & Inj. Lines (ft)	#3/8" O2 Hose	1-1/4" Stinger (ft)	2" Prod. Downhole Pipe	Producers	Injectors
MU-1	30,000		43,200	15,200	38	72
MU-2	34,000		47,400	20,800	52	79
MU-3	39,520		57,400	22,800	57	95
MU-4	68,900		101,400	38,400	96	169
MU-5	103,740	55,500	0	74,000	183	214
MU-6	99,200	52,500	0	70,000	175	205

Pipe Volumes:

<u>Normal Pipe Size</u>	<u>Wall Thickness (inches)</u>	<u>Pipe O.D (inches)</u>	<u>Volume⁽¹⁾ per Foot (ft³/ft)</u>
3/8" O2 Hose		0.375	0.0313
2" Sch. 40 downhole	0.154	2.375	0.0074
1-1/4" Sch. 40 stinger	0.145	1.660	0.0044
2" SDR 13.5 inj. & prod.	0.14815	2.2963	0.0069
4" SDR 35	0.1143	4.236	0.0103
6" Sch. 40 process pipe	0.280	6.500	0.0384
6" Trunkline	0.491	6.566	0.0651
8" Trunkline	0.639	8.543	0.1103
10" Trunkline	0.796	10.654	0.1712
12" Trunkline	0.944	12.637	0.2408

MU-1

- 1) Removal/disposal of 2" production and injection lines. Piping is rated SDR 13.5 and constructed of HDPE.
- o Two inch lines are buried 18-24" deep and can be pulled up with a loader. A two man crew should remove 450 ft per day. Two additional men will shred the pipe.
 - a. Remove pipe:
 $30,000 \text{ ft} \times 2 \text{ man-days}/450 \text{ ft}$
 $\times \$136/\text{man-day} =$ \$18,133
 - b. Shred pipe:
 $30,000 \text{ ft} \times 2 \text{ man-days}/450 \text{ ft}$
 $\times \$136/\text{man-day} =$ 18,133
 - c. Equipment:
 - o IT12 loader, \$52/hr \times 533 hours = 27,716
 - o Shredder, \$12/hr \times 533 hours = 6,396
 - d. Disposal:
 $30,000 \text{ ft} \times .0069 \text{ ft}^3/\text{ft} \times$
 $\$12.42/\text{ft}^3 \times 1.25(1) =$ 3,214
- 73,592
- or \$2.45/ft
- (1) 1.25 factor for void spaces.
- 2) Removal/disposal of trunklines, including trunklines to plant buildings. Piping is rated SDR 13.5.
- a. Remove pipe:
 $5,400 \text{ ft} \times 2 \text{ man-days}/200 \text{ ft}$
 $\times \$136/\text{man-day} =$ \$7,344
 - b. Shred pipe:
 $5,400 \text{ ft} \times 2 \text{ man-days}/200 \text{ ft}$
 $\times \$136/\text{man-day} =$ 7,344
 - c. Equipment:
 - o IT12 loader, \$52/hr \times 216 hours = 11,232
 - o Shredder, \$12/hr \times 216 hours = 2,592
 - d. Disposal:
 $6" - 1000 \text{ ft} \times 0.0651 \text{ ft}^3/\text{ft} \times$
 $\$12.42/\text{ft}^3 \times 1.25 =$ 1,011
 $8" - 4,400 \text{ ft} \times 0.1103 \text{ ft}^3/\text{ft} \times$
 $\$12.42/\text{ft}^3 \times 1.25 =$ 7,535
- 37,058
- 3) Removal/disposal of downhole pipe. Downhole pipe is Sch. 40 PVC.
- o From experience, 10 wells of downhole pipe can be removed each day with a 3 man crew and a spreader.
 - a. Removal of downhole pipe
 $43,200 \text{ ft stinger} \times 3 \text{ man-days}/6,000 \text{ ft}$
 $\times \$136/\text{man-day} =$ 2,938
 $15,200 \text{ ft prod.} \times 3 \text{ man-days}/6,000 \text{ ft}$

	x \$136/man-day =	1,034	
b.	Shred pipe:		
	43,200 ft x 2 man-days/4,500 ft		
	x \$136/man-day =	2,611	
	15,200 ft x 2 man-days/4,500 ft		
	x \$136/man-day =	919	
c.	Equipment:		
	Tractor: \$41/hour x 78 hours =	3,198	
	Smasher: \$12/hour x 78 hours =	936	
d.	Disposal:		
	43,200 ft x .0044 ft ³ /ft x \$12.42/ft ³ x 1.25 =	2,951	
	15,200 ft x .0074 ft ³ /ft x \$12.42/ft ³ x 1.25 =	<u>1,746</u>	
			\$16,333
	or \$0.26/ft (stinger pipe)		
	or \$0.31/ft (2" production pipe)		

4)	Well Plugging.		
	o Assume 700 ft total depth/well average.		
a.	Materials:		
	Cement - 564 lbs x \$100/ton =	\$28	
	Bentonite - 45 lbs x \$190/ton =	4	
	Salt - 33 lbs x \$56/ton =	1	
	Well Cap	10	
b.	Labor:		
	2 hours/well x 1 day/8 hours x 2 man-days		
	x \$136/man-day =	68	
c.	Equipment:		
	Backhoe - 1/2 hour/well x \$46/hour =	23	
	Mixing Unit - 2 hours x \$12/hour =	<u>24</u>	
		\$158/well	
	110 production and injection wells		
	x \$158/well =	\$17,380	
	11 monitor wells x \$158/well =	<u>1,738</u>	
			\$19,118

5)	Wellfield surface area reclamation.		
	o Remove and dispose of contaminated soil around well, scarify and seed well locations		
a.	Remove and dispose of contaminated soil:		
	10 ft ³ /well x 110 wells x		
	1 cy/27 ft ³ x \$147/cy =	\$5,989	
	20 hours loader x \$52/hour =	1,040	
	20 man-hours x \$136/8 hours =	340	
b.	Recontour and seed		
	9.3 acres x \$294/acre =	<u>2,734</u>	
			\$10,103

6) Wellfield house dismantle and disposal.

o Dismantle wellfield house (10'x20'x10')

a. Labor:

2 man-days x \$136/man-day

\$272

b. Equipment (IT12):

2 hours x \$52/hour =

104

c. Disposal at landfill

\$370/load x 6,000 lbs/wellhouse

x 1 load/40,000 lbs =

56

Total per wellhouse

\$432

2 Wellhouses x \$432/wellhouse =

\$864

MU-1 Total

\$157,068

MU-2

1)	Removal/disposal of 2" production and injection lines		
a.	34,000 ft x \$2.45/ft =		\$83,300
2)	Removal/disposal of trunklines. Piping is rated SDR 13.5.		
a.	Remove pipe: 2,900 ft x 2 man-days/200 ft x \$136/man-day =	\$3,944	
b.	Shred pipe: 2,900 ft x 2 man-days/200 ft x \$136/man-day =	3,944	
c.	Equipment: o IT12 loader, \$52/hr x 116 hours = o Shredder, \$12/hr x 116 hours =	6,032 1,392	
d.	Disposal: 6" - 1,600 ft x 0.065 ft ³ /ft x \$12.42/ft ³ x 1.25 = 8" - 1,300 ft x 0.1103 ft ³ /ft x \$12.42/ft ³ x 1.25 =	1,617 <u>2,226</u>	
			19,155
3)	Removal/disposal of downhole pipe		
a.	47,400 ft stinger x \$0.26/ft =	12,324	
b.	20,800 ft production x \$0.31/ft =	<u>6,448</u>	
			18,772
4)	Well plugging		
o	131 production and injection wells, 14 monitoring wells		
a.	145 wells x \$158/well =		22,910
5)	Surface reclamation		
a.	Removal/disposal of contaminated soil 131 wells x \$54/well =	7,074	
b.	Recontour, seed 11.7 acres x \$294/acre =	<u>3,440</u>	
			10,514
6)	Wellfield house dismantle/disposal		
a.	3 wellfield houses x \$432/wellfield house =	<u>1,296</u>	

MU-2 Total**\$155,947**

MU-3

1)	Removal/disposal of 2" production and injection lines		
a.	39,520 ft x \$2.45/ft =		\$96,824
2)	Removal/disposal of trunklines. Piping is rated SDR 13.5.		
a.	Remove pipe:		
	2,950 ft x 2 man-days/200 ft		
	x \$136/man-day =	\$4,012	
b.	Shred pipe:		
	2,950 ft x 2 man-days/200 ft		
	x \$136/man-day =	4,012	
c.	Equipment:		
	o IT12 loader, \$52/hr x 118 hours =	6,136	
	o Shredder, \$12/hr x 118 hours =	1,416	
d.	Disposal:		
	8" - 1,450 ft x 0.1103 ft ³ /ft x		
	\$12.42/ft ³ x 1.25 =	2,483	
	12" - 1,500 ft x 0.2408 ft ³ /ft x		
	\$12.42/ft ³ x 1.25 =	<u>5,608</u>	
			23,667
3)	Removal/disposal of downhole pipe		
a.	57,400 ft stinger x \$0.26/ft =	\$14,924	
b.	22,800 ft production x \$0.31/ft =	<u>7,068</u>	
			21,992
4)	Well plugging		
	o (152 production and injection wells, 14 monitor wells)		
a.	166 wells x \$158/well =		26,228
5)	Surface reclamation		
a.	Removal/disposal of contaminated soil		
	166 wells x \$54/well =	8,964	
b.	Recontour, seed		
	13.4 acres x \$294/acre =	<u>3,940</u>	
			12,904
6)	Wellfield house dismantle/disposal		
a.	4 wellfield houses x \$432/wellfield house =	<u>1,728</u>	

MU-3 Total**\$183,343**

MU-4

1)	Removal/disposal of 2" production and injection lines		
a.	68,900 ft x \$2.45/ft=		\$168,805
2)	Removal/disposal of trunklines. Piping is rated SDR 13.5.		
a.	Remove pipe:		
	7,400 ft x 2 man-days/200 ft		
	x \$136/man-day =	\$10,064	
b.	Shred pipe:		
	7,400 ft x 2 man-days/200 ft		
	x \$136/man-day =	10,064	
c.	Equipment:		
	o IT12 loader, \$52/hr x 296 hours =	15,392	
	o Shredder, \$12/hr x 296 hours =	3,552	
d.	Disposal:		
	8" - 5,400 ft x 0.1103 ft ³ /ft x		
	\$12.42/ft ³ x 1.25 =	9,247	
	12" - 2,000 ft x 0.2408 ft ³ /ft x		
	\$12.42/ft ³ x 1.25 =	<u>7,477</u>	
			55,796
3)	Removal/disposal of downhole pipe		
a.	101,400 ft stinger x \$0.26/ft=	26,364	
b.	38,400 ft production x \$0.31/ft=	<u>11,904</u>	
			38,268
4)	Well plugging		
	(265 production and injection wells, 18 monitor wells)		
a.	283 wells x \$158/well=		44,714
5)	Surface reclamation		
a.	Removal/disposal of contaminated soil		
	283 wells x \$54/well =	15,282	
b.	Recontour, seed		
	25 acres x \$294/acre=	<u>7,350</u>	
			22,632
6)	Wellfield house dismantle/disposal		
a.	5 wellfield houses x \$432/wellfield house =	<u>2,160</u>	

MU-4 Total**\$332,275**

MU-5

1)	Removal/disposal of 2" production and injection lines		
a	103,740 ft x \$2.45/ft=		\$254,163
2)	Removal/disposal of trunklines. Piping is rated SDR 13.5.		
a	Remove pipe:		
	17,800 ft x 2 man-days/200 ft		
	x \$136/man-day =	\$24,208	
b	Shred pipe:		
	17,800 ft x 2 man-days/200 ft		
	x \$136/man-day =	24,208	
c	Equipment:		
	o IT12 loader, \$52/hr x 712 hours =	37,024	
	o Shredder, \$12/hr x 712 hours =	8,544	
d	Disposal:		
	8" - 3,700 ft x 0.1103 ft ³ /ft x		
	\$12.42/ft ³ x 1.25 =	6,336	
	12" - 14,100 ft x 0.2408 ft ³ /ft x		
	\$12.42/ft ³ x 1.25 =	<u>52,712</u>	
			153,032
3)	Removal/disposal of downhole pipe		
a	Dispose:		
	55,500 ft hose x 0.0313 ft ³ /ft x \$12.42/cf x 1.25=	26,969	
	Remove:		
	55,500 ft x 1 man-day/1,000ft x \$136/man-day=	7,548	
b	74,000 ft production x \$0.31/ft=	<u>22,940</u>	
			57,457
4)	Well plugging		
	o (397 production and injection wells, 52 monitor wells)		
a	449 wells x \$158/well=		70,942
5)	Surface reclamation		
a	Removal/disposal of contaminated soil		
	449 wells x \$54/well =	24,246	
b	Recontour, seed		
	32 acres x \$294/acre=	<u>9,408</u>	
			33,654
6)	Wellfield house dismantle/disposal		
a	7 wellfield houses x \$432/wellfield house =	<u>3,024</u>	

MU-5 Total**\$572,272**

MU-6

1)	Removal/disposal of 2" production and injection lines		
a.	99,200 ft x \$2.45/ft=		\$243,040
2)	Removal/disposal of trunklines. Piping is rated SDR 13.5.		
a.	Remove pipe:		
	12,000 ft x 2 man-days/200 ft		
	x \$136/man-day =	\$16,320	
b.	Shred pipe:		
	12,000 ft x 2 man-days/200 ft		
	x \$136/man-day =	16,320	
c.	Equipment:		
	o IT12 loader, \$52/hr x 480 hours =	24,960	
	o Shredder, \$12/hr x 480 hours =	5,760	
d.	Disposal:		
	8" - 2,000 ft x 0.1103 ft ³ /ft x		
	\$12.42/ft ³ x 1.25 =	3,425	
	12" - 10,000 ft x 0.2408 ft ³ /ft x		
	\$12.42/ft ³ x 1.25 =	<u>37,384</u>	
			104,169
3)	Removal/disposal of downhole pipe		
a.	Dispose:		
	52,500 ft hose x 0.0313 ft ³ /ft x \$12.42/cf x 1.25=	25,511	
	Remove:		
	52,500 ft x 1 man-day/1,000ft x \$136/man-day=	7,140	
b.	70,000 ft production x \$0.31/ft=	<u>21,700</u>	
			54,351
4)	Well plugging		
	o (380 production and injection wells, 52 monitor wells)		
a.	432 wells x \$158/well=		68,256
5)	Surface reclamation		
a.	Removal/disposal of contaminated soil		
	432 wells x \$54/well =	23,328	
b.	Recontour, seed		
	40.2 acres x \$294/acre=	<u>11,819</u>	
			35,147
6)	Wellfield house dismantle/disposal		
a.	7 wellfield houses x \$432/wellfield house =	<u>3,024</u>	

MU-6 Total**\$507,987****TOTAL WELLFIELD RECLAMATION MU-1, 2, 3, 4, 5 and 6****\$1,908,992**

C. COMMERCIAL PLANT RECLAMATION/DECOMMISSIONING

The plant interior components, tanks, pumps, steel structure, filters, piping and electrical components are from an in-situ plant that was moved from Texas to the Crow Butte site in 1988. The actual cost to perform this work, escalated to 1997 \$'s, is used for bonding purposes with the breakdown of volumes of equipment and other structural items included.

- 1) Dismantle interior steel, tanks, pumps, filters, piping and electrical components (including labor, equipment, tools, etc.)
The volume of components to be dismantled are detailed below:

Interior structural steel - 75 tons

Tanks - 34 each

Pumps - 30 each

Piping - 8,250 feet

Filters - 4 each

Dryer - 1 each

Electrical boxes - 20 each (estimate)

- o $\$66,600 (1988\$) \times 160.3 \text{ (June 1997 CPI Index)}/$
 $118.3 \text{ (1988 average CPI Index)} =$ \$90,245

- 2) Dismantle plant building (including office and lab area)

- o 146 tons of steel, siding, girts x \$300
(1988 dismantle cost)/ton x 160.3/118.3 = \$59,350

- 3) Decontaminate floor and walls of plant building:

Plant floor area is 30,000 sf, 5,450 sf

will be removed and disposed of, and

7,000 sf is in warehouse, shop and

water tank areas which will

not be contaminated. The remaining

floor area is 17,530 sf.

HCl will be sprayed on the floors

and walls and recycled in the

plant sumps for reuse until neutralized.

Wall area is approximately 24,000 sf.

Use 1 gal HCl/sf for wall

area and 2 gal HCl/sf for floors.

- a. Material:

Floors: 17,530 sf x 2 gal HCl/sf

x \$0.57/gal HCl = \$19,984

Walls: 24,000 sf x 1 gal HCl/sf

x \$0.57/gal HCl = 13,680

- b. Labor:

2 men x 30 days x \$136/man-day = \$8,160

- c. HCl Disposal (to ponds):

59,060 gal HCl x 5 HP/30 gpm x .75 Kw/HP x
\$0.05/Kw-hr= \$370

d.	Decontamination equipment:		
	Sprayer pump	\$500	
	Tank (on hand)		
	Recycle pump	500	
	Sprayer with hose	<u>1,000</u>	
		<u>\$2,000</u>	\$44,194
4)	Dispose of concrete		
o	Area which would be potentially contaminated and not decontaminated by HCl is 5,450 ft ² . The areas are in the trough drains, sumps, yellowcake dryer, belt filter, precipitation cells and eluant tanks. Average concrete thickness is 6".		
a.	Disposal:		
	5,450 ft ² x .5 ft x \$147/cy x 1 cy/27 ft ³ =	\$14,836	
b.	Removal:		
	5,450 ft ² x \$2.72/sf =	<u>\$14,824</u>	\$29,660
5)	Dismantle/dispose of tanks		
o	There are 27 process tanks to be disposed of at an NRC licensed disposal facility. All of the tanks are fiberglass and will be cut up into pieces for disposal. Seven tanks are chemical storage tanks and will be disposed of at a licensed landfill.		
a.	Labor:		
	34 tanks x 2 man-days/tank x		
	\$136/man-day =	9,248	
b.	Disposal:		
	27 tanks @ (14' dia x 14' high		
	x 1/4" wall thickness)		
	27 tanks x 19.3 ft ³ /tank		
	x 1.20(1) x \$12.42/ft ³ =	7,766	
c.	Clean and haul chemical tanks: 7 chemical storage tanks will be disposed of in a licensed landfill (1) truckload		
	\$10 fee + \$360 =	370	
	7 tanks x 1 man-day cleaning/tank		
	x \$136/man-day =	952	
d.	Equipment:		
	Saws, scaffolding, tools, etc. =	<u>5,708</u>	
			\$24,044
(1)	void space factor		
6)	Dispose of pumps		
o	30 process pumps are in the commercial plant plus 78 downhole pumps. Plant pumps are approximately 5 ft ³ each, downhole pumps are 0.5 ft ³ each		
a.	30 pumps x 5 ft ³ /pump x \$12.42/ft ³ =	\$1,863	
b.	350 downhole pumps x 0.5 ft ³ /pump		
	x \$12.42/ft ³ =	<u>2,174</u>	\$4,037

7)	Dispose of filters, (2) injection filters, (1) backwash filter and (1) yellowcake filter		
a.	4 filters x 100 ft ³ /filter x \$12.42/ft ³ =		\$4,968
8)	Dispose of yellowcake dryer		
c.	yellowcake dryer system is approximately 400 ft ³ in volume		
a.	400 ft ³ x \$12.42/ft ³ =		\$4,968
9)	Dispose of piping		
o.	There is a total of 8,250 ft of process piping in the plant with an average diameter of approximately 6". Of the 8,250 ft, roughly 50% is used for yellowcake process. The other pipe is for chemical make-up, raw and potable water.		
a.	NRC licensed disposal: 4,125 ft x 0.04 ft ³ /ft x \$12.42/ft ³ x 1.25(1) =	\$2,562	
b.	Landfill disposal: 1 load @ \$10 fee + \$360 =	<u>370</u>	
(1)	void space factor		\$2,932
10)	Reclaim plant site		
a.	Dirtwork: 20,000 cy x 1 hour/700 cy x \$133/hour =	\$3,800	
b.	Seed: 4 acres x \$294/acre =	<u>1,176</u>	
			\$4,976
11)	Supervisory labor for plant reclamation		
a.	(1) Eng. cer \$6,256/month x 6 months =	\$37,536	
b.	(1) Radiation Technician \$5,212/month x 6 months (operator wages included in above calculation) =	<u>31,272</u>	
			<u>\$68,808</u>

TOTAL COMMERCIAL PLANT RECLAMATION/DECOMMISSIONING

\$338,182

D. R.O. BUILDING RECLAMATION/DECOMMISSIONING

Use a factor based on square footage of commercial plant
for total reclamation/decommissioning of R.O. building

a. $\$338,182 \times 5,000 \text{ ft}^2 / 34,000 \text{ ft}^2 =$ \$49,733

TOTAL R.O. BUILDING RECLAMATION/DECOMMISSIONING \$49,733

E. EVAPORATION POND RECLAMATION

Pond reclamation consists of removal and disposal of the pond liners, piping, and sludge to an NRC licensed disposal facility. The pond earthen embankments will be leveled, top soiled and seeded. The liner will be cut in sections and stacked for shipment.

- 1) Removal and disposal of pond liner systems
 - a. Five solar evaporation ponds at 250,000 ft²/each at commercial plant
Total thickness of liners is 100 mils.
 $5 \text{ ponds} \times 250,000 \text{ ft}^2/\text{pond} \times 0.00833 \text{ ft thick} \times 1.25(1) \times \$12.42/\text{ft}^3 =$ \$161,654
 - b. Two solar evaporation ponds at R&D plant
Total liner thickness is 36 mils.
 $2 \text{ ponds} \times 50,000 \text{ ft}^2 \times 0.0030 \text{ ft thick} \times 1.25 \times \$12.42/\text{ft}^3 =$ \$4,657
 - c. Labor for liner and pipe removal
Cut and stack 40,000 ft²/day with a four man crew. (5 ponds \times 250,000 ft²/pond + 2 ponds \times 50,000 ft²/pond) \times 4 man-days: 40,000 ft² \times \$136/man-day = \$18,360
 - d. Equipment for liner and pipe removal
Loader:
176 hours \times \$52/hour = \$9,152
- (1) void space factor \$193,823
- 2) Removal/Disposal of leak detection pipe, SDR 35 pipe.
 - a. Commercial pond pipe removal:
 $5 \text{ ponds} \times 2,100 \text{ ft of 4" pipe/pond} \times .0103 \text{ ft}^3/\text{ft} \times 1.25 \times \$12.42/\text{ft}^3 =$ \$1,679
 - b. R&D pond pipe removal:
 $2 \text{ ponds} \times 600 \text{ ft of 3" pipe/pond} \times .0069 \text{ ft}^3/\text{ft} \times 1.25 \times \$12.42/\text{ft}^3 =$ 129
 - c. Pipe disposal:
 $24.60 \text{ ft}^3 \times \$12.42/\text{ft}^3 \times 1.25 =$ 382
- (2) \$2,190
- 3) Removal/disposal of pond sludge.
 - a. Pond sludge removal is based on removal of sludge in R&D ponds after operation and restoration.
 - a. Sludge disposal:
 $38 \text{ barrels} \times 55 \text{ gallons/barrel} \times 1 \text{ cf}/7.48 \text{ gallons} \times 1 \text{ cy}/27 \text{ cf} = 10.4 \text{ cy}$
Flow through R&D plant was 101,625,362 gallons, therefore, 1 cy of sludge per 9,772,000 gallons processed. Total flow for 1991 to 1997 will be approximately 6,066,700,000 gallons
 $6,066,700,000 \text{ gallons} \times 1 \text{ cy}/9,772,000 \text{ gallons} \times \$147/\text{cy} =$ \$91,261

b.	Labor:		
	532 cy x 3 man-days/25 cy x \$136/man-day =	8,682	
c.	Equipment (IT12):		
	\$52/hour x 100 hours =	<u>5,200</u>	\$105,143
4)	Reclaim ponds.		
o	Dirtwork volume per pond is approximately 60,000 cy/pond at commercial and 30,000 cy total at R&D based on post construction surveys.		
o	Total earthwork volume is 330,000 cy.		
o	Average dozing distance is 150 ft. A D8 will get 700 cy per hour(1).		
a.	Dirtwork:		
	330,000 cy x 1 hour/700 cy x \$133 (including operator)/hour =	\$62,700	
b.	Topsoil placement and seed:		
	30 acres x \$294/acre =	<u>8,820</u>	\$71,520
(1)	Caterpillar Handbook, Edition 19		
5)	Supervisory labor for pond reclamation.		
a.	(1) Engineer		
	\$6,256/month x 3 months =	\$18,768	
b.	(1) Radiation Technician		
	\$5,212/month x 3 months (operator wages included in above calculation) =	<u>15,536</u>	<u>\$34,404</u>

TOTAL EVAPORATION POND RECLAMATION

\$407,080

F. MISCELLANEOUS SITE RECLAMATION

1)	Reclaim/seed main access road.		
a.	Road dirtwork:		
	4,000' long x 25' wide x 1' deep x		
	1 cy/27 ft ³ = 3,704 cy		
	3,704 cy x 1 hour/200 cy x \$133/hour =	\$2,463	
b.	Wellfield road dirtwork:		
	25,000' long x 12' wide x 1/2' deep x		
	1cy/27 ft ³ = 5,556 cy		
	5,556 cy x 1 hour/200cy x \$133/hour=	3,695	
c.	Seed roadway:		
	2.3 acres x \$294/acre =	<u>676</u>	
			\$6,834
2)	Remove/dispose of pipe from commercial plant to ponds and from commercial plant to R.O. building.		
o	Pond pipeline (2, at 2,000' = 4,000 ft		
o	Pipe to R.O. (4) at 300" = 1,200 ft		
o	5,200' average size 4" Sch. 40		
a.	Disposal:		
	5,200 ft x .021 ft ³ x \$12.42/ft ³ x 1.25 =	\$1,695	
b.	Removal labor:		
	5,200 ft x 3 man-days/200 ft x \$136/man-day =	10,608	
c.	Equipment:		
o	Loader:		
	5 days x \$52/hour x 8 hours/day =	2,080	
o	Shredder:		
	5 days x \$12/hour x 8 hours/day =	<u>480</u>	
			\$14,863
3)	Remove electrical facilities.		
a.	Remove HV lines:		
	6,000 ft of HV line at \$0.59/ft =	\$3,540	
b.	Remove substations:	<u>1,175</u>	
			\$4,715
4)	Supervisory Labor.		
a.	(1) Engineer		
	\$6,256/month x 3 months =	\$18,768	
b.	(1) Radiation Technician		
	\$5,212/month x 3 months		
	(Operator wages included in above calculations) =	<u>15,636</u>	
			<u>\$34,404</u>

TOTAL MISCELLANEOUS SITE RECLAMATION

\$60,816

G. DEEP DISPOSAL WELL RECLAMATION

Attachment A includes the cost estimate for the deep well plugging, abandonment and site reclamation. This information is from the June 6, 1996 Completion of Construction Report - Crow Butte Resources, Inc., Class 1 UIC Well submitted to the NDEQ. A summary of the cost is given below, escalated to 1997 \$.

1) Plugging and Abandonment $\$59,026 \times 1.03 =$	\$60,797
2) Site Reclamation $\$2,346 \times 1.03 =$	<u>2,416</u>

TOTAL DEEP DISPOSAL WELL RECLAMATION

\$63,213

H. I - 196 BRULE AQUIFER RESTORATION

The following estimate is based on the May 28, 1996 Remediation Plan using six pore volumes (pv) as the total water extracted.

1) Pump Wells 196a, j & n (Ground Water Sweep)		
a. Power:		
$337,758 \text{ gals/pv} \times 3 \text{ pv} \times 1 \text{ min/3gal} \times 1 \text{ hour/60min}$		
$\times 3 \text{ kw} \times \$0.05/\text{kwhr} =$	\$844	
b. Manpower:		
$234 \text{ days} \times 0.13 \text{ man-day/day} \times \$136/\text{man-day} =$	<u>4,137</u>	4,981
2) Bi-weekly sampling (in-house analyses):		
$234 \text{ days} \times 1 \text{ man-day/14days} \times \$136/\text{man-day} =$		2,273
3) Bi-weekly I - 196i, m, l sampling:		2,273
(Same as # 2)		
4) Pump additional wells:		
a. Pump from additional wells:		
(Same as 1-3 above)	9,527	
b. Drill four additional wells:		
$4 \text{ wells} \times 50 \text{ ft} \times \$26 =$	<u>5,200</u>	14,727
5) Well Abandonment:		
a. $14 \text{ wells} \times \$158/\text{well} =$		<u>2,212</u>

TOTAL I-196 RESTORATION

\$26,466