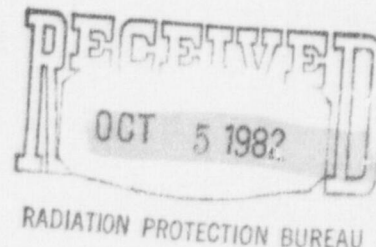


# Mobil Oil Corporation

5/10 1103  
SAM *[Signature]*  
P.O. BOX 5444  
DENVER, COLORADO 80217  
URANIUM/MINERALS DIVISION

September 30, 1982

Mr. Sam Simpson  
Project Manager  
Uranium Licensing Section  
Radiation Protection Bureau  
Environmental Improvement Division  
P. O. Box 968  
Santa Fe, New Mexico 87503



RESPONSES TO QUESTIONS  
RADIOACTIVE MATERIAL LICENSE  
SOUTH TREND DEVELOPMENT AREA

Dear Mr. Simpson:

Please find enclosed Mobil Oil Corporation's responses to the questions forwarded by the Environmental Improvement Division - Radiation Protection Bureau (EID-RPB) on August 23, 1982.

The responses are based upon our understanding of our previous meetings and correspondence with the EID-RPB. We believe they adequately address your request for additional information needed in order to finalize the License Application Analysis now in preparation. Should you have any additional concerns, please contact W. A. Steingraber at (303) 572-5764.

Very truly yours,

*[Signature]*  
G. A. Cresswell, Manager  
Hydrological & Environmental Affairs

WASSteingraber/mk

Enclosure

cc: W. L. Luthy - Nufuels  
D. Walker - U/M

p.f. 1.A.2.4.7

*[Signature]*

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PDR ADOCK 04008909  
C PDR

RESPONSES TO  
REQUESTS FOR ADDITIONAL INFORMATION

DATED  
AUGUST 23 1982

RADIOACTIVE MATERIAL LICENSE  
FOR  
CROWNPOINT SOUTH TREND DEVELOPMENT AREA  
IN-SITU URANIUM PROJECT  
McKINLEY COUNTY, NEW MEXICO

SUBMITTED BY  
MOBIL OIL CORPORATION  
SEPTEMBER 30, 1982

Response To Question 1 - Mobil intends to comply fully with the provisions of Part 3-315 of the New Mexico Radiation Protection Regulations (NMRPR) which requires that acceptable financial surety arrangements be made in order to assure that sufficient funds will be available for reclamation (decommissioning and decontamination) to include waste disposal and final surface treatment. Our response to the Environmental Improvement Division-Radiation Protection Bureau (EID-RPB) on April 19, 1982 stated that the cost for reclamation activities for the proposed 600 gpm processing facilities and Operational Area #1 was estimated to be \$4,550,000. We acknowledge that annual surety updates must be provided and subsequent surety arrangement must be made for other Operational Areas brought on line at later dates.

At this time, Mobil's Office of General Counsel and Controllers Department are evaluating the surety arrangement options provided for in Part 3-315 of the NMRPR in order to decide which is the most logical and desirable surety arrangement for our proposed operations. The option we are investigating most intently is that of self-insurance or the showing of financial responsibility and performance capability. Our evaluation of the available surety options should be completed in October 1982, and at that time we can make a submittal of the proposed surety arrangements to the EID-RPB for their approval.

Response To Question 2 - Mobil intends to utilize deep-well injection as the prime option for disposal of liquid wastes streams generated during production and restoration activities at the South Trend Development Area. The primary components of the waste disposal well pretreatment facility at this project will



consist of a backwashable sand filter followed in line with a disposable cartridge polishing filter. During the cleaning cycle of the system all backwash effluent containing suspended solids will be routed to a two to three thousand gallon, concrete lined sump for collection. Solids will be removed from the sump periodically, and will be ultimately shipped to a licensed conventional tailings impoundment or other approved site for disposal. Disposable filter cartridges will likewise be packaged and ultimately shipped to a licensed tailings impoundment or other approved site as the need arises. All packaging, transportation, and disposal facility agreements will be in accordance with Mobil's approved Yellowcake/LAS Shipping and Transportation Plan and applicable regulatory guidelines.

Response To Question 3 - In order to minimize potential soil clean-up activities, Mobil intends to install drip pans (or a similar purpose collection system) underneath field header assemblies carrying pregnant and/or barren lixiviant to or from the wellfield to the processing plant.