



State of Utah

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DIVISION OF WASTE MANAGEMENT  
AND RADIATION CONTROL  
Scott T. Anderson  
*Director*

May 3, 2018

Joshua Bleak, President  
Anfield Resources Holding Corp.  
P.O. Box 901537  
Sandy, Utah 84090

RE: Utah Radioactive Material License Number UT 0900480

Dear Mr. Bleak:

Thank you for your letter dated March 28, 2018, in which you explained the relationship between Anfield Energy, Inc. (previously Anfield Resources, Inc.) and Anfield Resources Holding Corp. (ARHC). The Division of Waste Management and Radiation Control has independently verified that ARHC is a Utah corporation incorporated in Utah on September 20, 2013. Division of Corporations records further disclose that ARHC was reinstated as of June 13, 2017. The sole officer and director of ARHC according to the Utah Division of Corporations is Joshua Bleak (President and Sole Director).

Your letter reaffirmed that ARHC is the corporate entity that is the licensee pursuant to Utah Radioactive Materials License Number UT 0900480 (License). This is consistent with the Division's understanding. As a result, ARHC is the corporate entity that is responsible for all activities conducted under the License. Your letter also stated that Anfield Energy, Inc. (AEI) will not be able to change or influence ARHC management personnel or ARHC policies and procedures related to the License or licensed activities. According to this information, the Ground Water Permit (GWP) and License for the Shooting Canyon Uranium Mill was correctly issued to ARHC.

Since the License and GWP were correctly issued to ARHC, all correspondence and submissions related to the License or the GWP must be submitted by ARHC on ARHC letterhead and signed by a duly authorized officer of ARHC. Based on Division of Corporations records, the only authorized officer of ARHC is Joshua Bleak. If another individual purports to communicate with the Division on behalf of ARHC, some form of authorization signed by Mr. Bleak must be included so that the person's authority to communicate on behalf of ARHC is apparent. Moreover, because ARHC and only ARHC is the Licensee and the Permittee under the GWP, submissions by AEI are not acceptable to renew or modify the GWP or the License.

DRC-2018-004022

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Based on the foregoing, the Division has determined that the License Renewal Application dated June 30, 2016 and all subsequent associated documents for the license renewal are not acceptable because they were expressly submitted by and on behalf of ARI (now AEI). The submission letter stated, “with this letter, Anfield Resources, Inc. is submitting the Radioactive Materials License Renewal Application test, tables ....” (emphasis added). Anfield Resources, Inc. is not the Licensee nor the Permittee. In addition, the title page for the renewal application states, “... submitted by Anfield Resources, Inc. ....” The renewal application also references ARI at the top of each page. However, there is no reference to ARHC even though ARHC is the licensee. Finally, the application was not properly executed by Mr. Bleak, the only officer of ARHC known by the Division to have authority to act on behalf of ARHC, the Licensee and Permittee.

Under Division and NRC regulations, renewal applications must be submitted by the licensee. Therefore, the renewal application for the Mill must be resubmitted and correctly reference ARHC as the Licensee instead of AEI. Any content included in the renewal application related to AEI should be updated to correctly provide information for ARHC. For example, Figure 5.1 of the renewal application submitted with the letter dated June 27, 2017, is an organization chart including the statement, “Prepared for Anfield Resources, Inc.” This suggests that the Figure 5.1 represents AEI’s corporate structure instead of the Licensee’s (ARHC’s) corporate structure. Therefore, for example, Figure 5.1 must be updated to provide the correct information for ARHC.

Please note that Form DWMRC-01 must be completed and signed by an authorized person. Based on available information, the only person authorized to act on behalf of ARHC is Joshua Bleak. Therefore, Mr. Bleak must execute all relevant documents. Alternatively, if a different individual is authorized to sign on behalf of ARHC, a copy of an appropriate corporate resolution providing such authorization must be included.

Finally, the previously-submitted renewal application did not contain Form DWMRC-01 with the required certification statement and management signature. Form DWMRC-01 may be found at the following URL:

“<https://deq.utah.gov/legacy/forms/waste-management-radiation-control/index.htm>”

Please correct and submit the required information no later than close of business on May 31, 2018. For questions regarding this matter, please call Heather Mickelson at (801) 536-4277, Gwyn Galloway at (801) 536-4258, or Phil Goble at (801) 536-4044.

Sincerely,



Scott T. Anderson, Director  
Division of Waste Management and Radiation Control

STA/GEG/HM/ka

c: Dr. David Blodgett, Health Officer, Southwest Utah Public Health Department  
Gary House, Deputy Director, Southwest Utah Public Health Department

Jeremy Roberts, Environmental Health Director, Southwest Utah Public Health Department  
Paul Wright, P.E., DEQ District Engineer  
Bret Randall, Attorney General's Office