



State of Utah

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Department of
Environmental Quality

L. Scott Baird
Interim Executive Director

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
Ty L. Howard
Director

October 1, 2019

Kathy Weinel, Quality Assurance Manager
Energy Fuels Resources (USA) Inc.
225 Union Blvd, Suite 600
Lakewood, CO 80228

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7004 1160 0005 5671 3815

RE: Energy Fuels Resources September 26, 2019, Plan for Installation of Groundwater Monitoring Well No. MW-24A at the White Mesa Uranium Mill
Radioactive Materials License No. UT1900479
Utah Groundwater Discharge Permit No. UGW370004 (Permit)

Dear Ms. Weinel:

The Utah Division of Waste Management and Radiation Control (DWMRC) has reviewed the Energy Fuels Resources (EFR) September 26, 2019 Plan for Installation of Groundwater Monitoring Well MW-24A (EFR Plan). The EFR Plan was submitted in response to a previous DWMRC review of a June 27, 2019 EFR Source Assessment Report for several constituents in the White Mesa Uranium Mill Monitoring Well MW-24 and a follow-up telephone conversation on September 3, 2019.

The intention of the installation of MW-24A is to determine whether MW-24 groundwater constituents in out of compliance status, some of which appear to be showing anomalous increasing trends, are due to issues regarding monitoring well MW-24 design and/or construction issues. Per the EFR Plan, MW-24A will be installed approximately 10 feet northwest of MW-24. The proposed well location is included as Figure 1 and per DWMRC review the location appears to be appropriate. Installation of MW-24A will allow for tandem sampling comparisons with MW-24 and will allow more monitoring data to be collected for better evaluation of the trending constituents and potential well design/construction issues.

Conditional Approval:

The EFR Plan is approved with the following conditions:

1. MW-24A must be properly designed, installed, screened/completed, and developed in

(Over)

accordance with Part I.E.4 of the Permit.

2. The MW-24A well screen will fully encompass the Burro Canyon Formation saturated zone.
3. MW-24A will be designed to be monitored for the full suite of monitoring constituents listed in the Permit Table 2.
4. Per the EFR Plan will be installed and operational within 90 days of EFR receipt of this approval letter.
5. Per the EFR Plan an As-built report for MW-24A will be submitted to DWMRC within 60 days of well completion as required by the Permit Part I.F.6. The As-built report shall comply with the requirements of the Permit Part I.F.6.
6. EFR shall provide at least a 14 day written notice prior to field drilling and construction of MW-24A to allow DWMRC to observe all drilling and well installation activities.
7. Per the EFR Plan *“Analytical data for MW-24A will be included in the routine quarterly groundwater monitoring reports. Discussion of the analytical results and the conclusions resulting from the tandem monitoring program will be submitted to DWMRC under separate cover at the end of 8 quarters of sampling.”*

If you have any questions, please call Tom Rushing at (801) 536-0080.

Sincerely,



Phil Goble, Uranium Mills and Radioactive Materials Manager
Division of Waste Management and Radiation Control

PRG/TR/kb

- c: Kirk Bengel, Health Officer, San Juan Public Health Department
Rick Meyer, Environmental Health Director, San Juan Public Health Department
Scott Hacking, P.E., DEQ District Engineer

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Kathy Weinel

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Kathy Weinel, Quality Assurance Manager
 Energy Fuels Resources (USA) Inc.
 225 Union Blvd, Suite 600
 Lakewood, CO 80228

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