

**Garrett, Betty**

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**From:** John Schmuck <John\_Schmuck@Cameco.com>  
**Sent:** Tuesday, August 13, 2013 10:35 AM  
**To:** Burrows, Ronald  
**Subject:** RE: Question on Aqui-Ver report

Ron - Yes, it is ok to place the package in ADAMs.

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**From:** Burrows, Ronald [mailto:Ronald.Burrows@nrc.gov]  
**Sent:** Tuesday, August 13, 2013 6:02 AM  
**To:** John Schmuck  
**Subject:** Question on Aqui-Ver report

Good morning, John.

I read through the Aqui-Ver report attached to the package for the restoration status of Mine Units 2 and 3 to support the 2012 surety estimate.

On page ii of this report, there is a statement of confidentiality. Do you wish this document to be withheld under 10 CFR 2.390 or is it OK to place the package with the report into ADAMS as publicly available?


Thank you.

on

*Ronald A. Burrows*

Ronald A. Burrows CHP, RRPT  
 U.S. Nuclear Regulatory Commission  
 Federal and State Materials and Environmental  
 Management Programs  
 Uranium Recovery Licensing Branch  
 301.415.6443

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United States Nuclear Regulatory Commission Official Hearing Exhibit			
In the Matter of:		POWERTECH USA, INC. (Dewey-Burdock In Situ Uranium Recovery Facility)	
	<b>ASLBP #:</b>	10-898-02-MLA-BD01	
	<b>Docket #:</b>	04009075	
	<b>Exhibit #:</b>	INT-021C-00-BD01	
	<b>Admitted:</b>	8/19/2014	<b>Identified:</b> 8/19/2014
	<b>Rejected:</b>		<b>Withdrawn:</b>
	<b>Other:</b>		<b>Stricken:</b>

**CAMECO RESOURCES  
CROW BUTTE OPERATION**

INT-021C



**86 Crow Butte Road  
P.O. Box 169  
Crawford, Nebraska 69339-0169**

**(308) 665-2215  
(308) 665-2341 – FAX**

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August 8, 2013

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. Ronald A. Burrows, Project Manager  
Decommissioning and Uranium Recovery Licensing Directorate  
Division of Waste Management and Environmental Protection  
Office of Federal and State Materials and Environmental Management Programs  
Mailstop T8-F5  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Source Materials License SUA-1534  
Docket No. 40-8943  
Restoration Status for Mine Units 2 and 3  
2012 Surety Estimate

Dear Mr. Burrows:

On May 9, 2013, Crow Butte Resources, Inc. (CBR), d/b/a Cameco Resources – Crow Butte Operation (CBO) submitted to the Nebraska Department of Environmental Quality (NDEQ), and copied the U.S. Nuclear Regulatory Commission (USNRC), the enclosed letters summarizing the restoration status of Mine Units 2 and 3. Through the approval of NDEQ by letter dated May 17, 2013, both of these mine units were placed into stability monitoring on June 19, 2013. Attached to these letters (and enclosed with this submittal) is a report from Aqui-Ver, Inc. which provides a detailed analysis and history of the RO treatment in these two mine units.

By letter dated May 21, 2012, NRC stated that CBO had not provided enough information to substantiate restoration efficiencies gained from facility upgrades and periodically calibrated groundwater flow models. The results of the Aqui-Ver, Inc. can be used to compare the relative effectiveness of restoration before and after the implementation of a model based restoration plan (MBRP). The study indicates complete restoration of the production aquifer can be achieved in approximately 3.6 to 6.0 pore volumes using the MBRP and CBO's calculated approximate pore volumes.

The Aqui-Ver, Inc. report is submitted as support for the pore volumes used for groundwater restoration in CBO's 2012 Surety Estimate. Not included in the report is the length of time required for stability monitoring. CBO will make adjustments to the 2014 Surety Estimate to reflect historical stability monitoring timelines.

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If you have any questions or concerns on this matter, please do not hesitate to call me at 308-665-2215 ext. 114.

Sincerely,



Larry Teahon  
Manager, Safety, Health, Environment, and Quality

Enclosures: As stated.

cc: CBO - File  
ec: CR - Cheyenne

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CROW BUTTE OPERATION**



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**86 Crow Butte Road  
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May 9, 2013

Mr. Michael Linder, Director  
Nebraska Department of Environmental Quality  
PO Box 98922  
Lincoln, Nebraska 68509-8922

Crow Butte Resources, Inc.  
Class III Underground Injection Control (UIC) Permit Number NE0122611  
Mine Unit 2 Restoration Status

Dear Mr. Linder:

In accordance with the approved Crow Butte Resources, Inc., d/b/a Cameco Resources -- Crow Butte Operation (CBO), Groundwater Restoration Plan, CBO is submitting analytical data concerning the restoration of Mine Unit 2 at the Crow Butte Uranium Project. Split samples from all restoration wells were obtained with the Nebraska Department of Environmental Quality (NDEQ) on February 28, 2013. This data provides supporting documentation that restoration efforts have been successful in returning Mine Unit 2 to the approved restoration goals. Upon NDEQ approval, CBO plans to place Mine Unit 2 into the initial phase of stabilization restoration.

Commercial operation of Mine Unit 2 began in March 1992. Mining was completed in January 1996 and restoration activities begun. The restoration plan for this mine unit was submitted to NDEQ on December 5, 1995 and was approved by NDEQ in a letter dated December 15, 1995. Injection of lixiviant into this mine unit was ceased on January 2, 1996. Since that time period, the mine unit has been in IX and RO treatment with the following exceptions:

On August 9, 2007 the entire restoration circuit was shut down so that changes could be made to increase the flow through IX and RO treatment. During this time period the mine unit was in recirculation to maintain a hydrologic bleed until April 1, 2009, when IX treatment resumed in this mine unit. On May 26, 2009, the RO circuit was restarted and this mine unit was placed back into RO treatment.

In February 2009, Crow Butte contracted with a third party hydrogeologist to develop a restoration flow model for Mine Units 2 through 5. The groundwater flows at the facility were simulated using MODFLOW2000, a three-dimensional groundwater flow model

# CAMECO RESOURCES CROW BUTTE OPERATION

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Mr. Michael Linder  
May 9, 2013  
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developed by the United States Geological Survey. The groundwater flow model was calibrated to pre-mining conditions using water level data collected prior to the mining activities in January 1983. Initial estimates of aquifer properties and boundary water levels were adjusted slightly as part of the model calibration process in order to achieve the best possible match between observed and simulated water levels. The calibrated groundwater flow model was used to optimize restoration in Mine Unit 2 given certain practical limitations on treatment rates, disposal capacity, and existing well injection and extraction rates. Based on this model, eight additional restoration wells were installed to remediate the excursion of lixiviant along the perimeter monitor wells PR-8 and PR-15.

Restoration was performed as described in the Groundwater Restoration Plan, utilizing groundwater transfer, treatment and recirculation. The total gallons used in each phase through the end of March 2013 are as follows:

Restoration Phase	Total Gallons	Pore Volumes
Transfer	515,900,920	23.86
Treatment (IX)	37,622,280	1.74
Treatment (RO)	348,979,080	16.14*
Recirculation	29,838,360	1.38

\*See attached AQUI-Ver, Inc. report for a detailed analysis and history of RO treatment.

CBO is required by the NDEQ UIC Permit to determine the baseline groundwater quality for a list of 27 water quality parameters. The baseline average for each well is determined for each parameter. These well averages are then used to determine the overall mine unit average for each parameter. Baseline for Mine Unit 2 was determined prior to mining operations and submitted for approval by the regulatory agencies.

NDEQ restoration goals are based upon state groundwater standards. For those parameters that have a numerical groundwater standard established in Title 118 of the NDEQ Rules and Regulations<sup>1</sup> or in other established documents, restoration must successfully return the groundwater to that standard. If the baseline preoperational mean for the mine unit exceeds the standard for any parameter, the restoration goal for that parameter is set at the baseline mean plus two standard deviations. Where no standard is established (calcium, potassium, magnesium and sodium) the restoration value is set at one order of magnitude above baseline mean. The restoration value for total carbonate shall not exceed 50% of the total dissolved solids.

<sup>1</sup> Title 118 – Ground Water Quality Standards and Use Classification, NDEQ July 29, 1996.

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All parameters in Mine Unit 2 have met the NDEQ restoration goals on a mine unit average. CBO obtained composite samples from the restoration wells on February 28, 2013. This sampling indicated that all parameters met the restoration goals.

The attached table provides analytical data for the Mine Unit 2 restoration wells. The results for all parameters are from the February 2013 composite sampling.

Based upon the analytical results, CBO believes that restoration efforts have been successful in restoring Mine Unit 2 to the approved restoration goals. Split sampling will be performed with the NDEQ upon approval from the department to begin stability monitoring. At that time, Mine Unit 2 will be shut in for the stabilization phase of restoration.

If you have any questions or require further information, please do not hesitate to contact me at (307) 316-7601.

Sincerely,  
CAMECO RESOURCES  
CROW BUTTE OPERATION

*William Goranson* / *TAR*  
William Goranson, President  
Crow Butte Resources, Inc.

Attachment: As Stated

cc: Shar Sapp – NDEQ Chadron Office  
Nancy Harris – NDEQ Lincoln Office  
Ron Burrows - NRC  
CBO - File  
cc: CR - Cheyenne

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INT-021C



**Mine Unit 2 Restoration Results**

Parameter	Title 118 Groundwater Standard <sup>2</sup>	MU-2 Baseline Mean	MU-2 Standard Deviation	MU-2 NDEQ Restoration Value <sup>3</sup>	MU-2 Average Water Quality February 2013
Ammonium (mg/L)	10.0	0.37	0.07	10.0	<0.05
Arsenic (mg/L)	0.05	<0.001	N/A	0.05	0.036
Barium (mg/L)	1.0	<0.1	N/A	1.0	<0.1
Cadmium (mg/L) <sup>1</sup>	0.005	<0.007	N/A	0.005	<0.005
Chloride (mg/L)	250.0	208.6	30.8	250.0	44.0
Copper (mg/L)	1.0	<0.013	N/A	1.0	<0.01
Fluoride (mg/L)	4.0	0.67	0.04	4.0	0.70
Iron (mg/L)	0.3	<0.045	N/A	0.3	0.10
Mercury (mg/L)	0.002	<0.001	N/A	0.002	<0.001
Manganese (mg/L)	0.05	<0.01	N/A	0.05	<0.01
Molybdenum (mg/L)	1.0	<0.073	N/A	1.0	0.1
Nickel (mg/L)	0.15	<0.037	N/A	0.15	<0.05
Nitrate (mg/L)	10.0	<0.039	N/A	10.0	1.0*
Lead (mg/L)	0.05	<0.035	N/A	0.05	<0.001
Radium (pCi/L)	5.0	234.5	411.8	1058.0	66.0
Selenium (mg/L)	0.05	<0.001	N/A	0.05	<0.005
Sodium (mg/L)	N/A	410.8	18.2	4108	141.0
Sulfate (mg/L)	250.0	348.2	10.3	369.0	83.0
Uranium (mg/L)	5.0	0.046	0.037	5.0	0.4280
Vanadium (mg/L)	0.2	<0.07	N/A	0.2	0.1
Zinc (mg/L)	5.0	<0.026	N/A	5.0	0.01
pH (Std. Units)	6.5 - 8.5	8.32	0.2	6.5 - 8.5	8.19
Calcium (mg/L)	N/A	13.4	2.4	134.0	5.0
Total Carbonate (mg/L)	N/A	366.9	13.3	585.0	185.0
Potassium (mg/L)	N/A	12.6	2.5	126.0	5.0
Magnesium (mg/L)	N/A	3.5	0.4	35.0	<0.01
TDS (mg/L)	N/A	1170.4	41	1170.4	411.0

<sup>1</sup> Standard for Cadmium lowered in modification to UIC permit dated March 9, 2001 following NDEQ approval of Mine Unit 1 restoration.

<sup>2</sup> Title 118 numerical standards in effect at the time the Notice of Intent was filed with the NDEQ.

<sup>3</sup> Restoration values based on Title 118 numerical standards and well field averages at the time the Notice of Intent was submitted to the NDEQ.

\*The composite sample was inadvertently stabilized with nitric acid, each individual well tested <0.1 mg/l.

N/A = Not Applicable

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**86 Crow Butte Road  
P.O. Box 169  
Crawford, NE 69339-0169**

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(308) 665-2341 - FAX**

May 9, 2013

Mr. Michael Linder, Director  
Nebraska Department of Environmental Quality  
PO Box 98922  
Lincoln, Nebraska 68509-8922

Crow Butte Resources, Inc.  
Class III Underground Injection Control (UIC) Permit Number NE0122611  
Mine Unit 3 Restoration Status

Dear Mr. Linder:

In accordance with the approved Crow Butte Resources, Inc., d/b/a Cameco Resources – Crow Butte Operation (CBO), Groundwater Restoration Plan, CBO is submitting analytical data concerning the restoration of Mine Unit 3 at the Crow Butte Uranium Project. Split samples from all restoration wells were obtained with the Nebraska Department of Environmental Quality (NDEQ) on March 1, 2013. This data provides supporting documentation that restoration efforts have been successful in returning Mine Unit 3 to the approved restoration goals. Upon NDEQ approval, CBO plans to place Mine Unit 3 into the initial phase of stabilization restoration.

Commercial operation of Mine Unit 3 began in November 1992. The restoration plan for this mine unit was submitted to NDEQ on March 24, 1999 and was amended and approved by NDEQ in a letter dated February 13, 2008. Injection of lixiviant into this mine unit was ceased on July 22, 1999. Since that time period, the mine unit has been in IX and RO treatment with the following exceptions:

On August 9, 2007 the entire restoration circuit was shut down so that changes could be made to increase the flow through IX and RO treatment. During this time period the mine unit was in recirculation to maintain a hydrologic bleed until April 1, 2009, when IX treatment resumed in this mine unit. On May 26, 2009, the RO circuit was restarted and this mine unit was placed back into RO treatment.

In February 2009, Crow Butte contracted with a third party hydrogeologist to develop a restoration flow model for Mine Units 2 through 5. The groundwater flows at the facility were simulated using MODFLOW2000, a three-dimensional groundwater flow model

## CAMECO RESOURCES CROW BUTTE OPERATION



Mr. Michael Linder  
May 9, 2013  
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developed by the United States Geological Survey. The groundwater flow model was calibrated to pre-mining conditions using water level data collected prior to the mining activities in January 1983. Initial estimates of aquifer properties and boundary water levels were adjusted slightly as part of the model calibration process in order to achieve the best possible match between observed and simulated water levels. The calibrated groundwater flow model was used to optimize restoration in Mine Unit 3 given certain practical limitations on treatment rates, disposal capacity, and existing well injection and extraction rates. Based on this model, eight additional restoration wells were installed to remediate the excursion of lixiviant along the perimeter monitor well IJ-13.

Restoration was performed as described in the Groundwater Restoration Plan, utilizing groundwater sweep, treatment and recirculation. The total gallons used in each phase through the end of March 2013 are as follows:

Restoration Phase	Total Gallons	Pore Volumes
Sweep	13,351,100	.70
Treatment (IX)	781,420,810	40.97
Treatment (RO)	473,010,400	24.80*
Recirculation	61,796,520	3.24

\*See attached Aqui-Ver, Inc. report for a detailed analysis and history of RO treatment.

CBO is required by the NDEQ UIC Permit to determine the baseline groundwater quality for a list of 27 water quality parameters. The baseline average for each well is determined for each parameter. These well averages are then used to determine the overall mine unit average for each parameter. Baseline for Mine Unit 3 was determined prior to mining operations and submitted for approval by the regulatory agencies.

NDEQ restoration goals are based upon state groundwater standards. For those parameters that have a numerical groundwater standard established in Title 118 of the NDEQ Rules and Regulations<sup>1</sup> or in other established documents, restoration must successfully return the groundwater to that standard. If the baseline preoperational mean for the mine unit exceeds the standard for any parameter, the restoration goal for that parameter is set at the baseline mean plus two standard deviations. Where no standard is established (calcium, potassium, magnesium and sodium) the restoration value is set at one order of magnitude above baseline mean. The restoration value for total carbonate shall not exceed 50% of the total dissolved solids.

<sup>1</sup> Title 118 – Ground Water Quality Standards and Use Classification, NDEQ July 29, 1996.

## CAMECO RESOURCES CROW BUTTE OPERATION



Mr. Michael Linder  
May 9, 2013  
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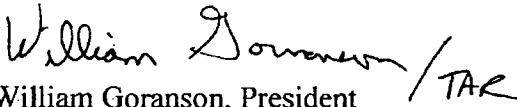
All parameters in Mine Unit 3 have met the NDEQ restoration goals on a mine unit average. CBO obtained composite samples from the restoration wells on March 1, 2013. This sampling indicated that all parameters met the restoration goals.

The attached table provides analytical data for the Mine Unit 3 restoration wells. The results for all parameters are from the March 2013 composite sampling.

Based upon the analytical results, CBO believes that restoration efforts have been successful in restoring Mine Unit 3 to the approved restoration goals. Split sampling will be performed with the NDEQ upon approval from the department to begin stability monitoring. At that time, Mine Unit 3 will be shut in for the stabilization phase of restoration.

If you have any questions or require further information, please do not hesitate to contact me at (307) 316-7601.

Sincerely,  
CAMECO RESOURCES  
CROW BUTTE OPERATION

  
William Goranson, President  
Crow Butte Resources, Inc.

Attachment: As Stated

cc: Shar Sapp – NDEQ Chadron Office  
Nancy Harris – NDEQ Lincoln Office  
Ron Burrows – NRC  
CBO - File  
cc: CR - Cheyenne

# CAMECO RESOURCES

## CROW BUTTE OPERATION



### Mine Unit 3 Restoration Results

Parameter	Title 118 Groundwater Standard <sup>2</sup>	MU-3 Baseline Mean	MU-3 Standard Deviation	MU-3 NDEQ Restoration Value <sup>3</sup>	MU-3 Average Water Quality March 2013
Ammonium (mg/L)	10.0	<0.329	N/A	10.0	0.09
Arsenic (mg/L)	0.05	<0.001	N/A	0.05	0.046
Barium (mg/L)	1.0	<0.1	N/A	1.0	<0.1
Cadmium (mg/L) <sup>1</sup>	0.005	<0.01	N/A	0.005	<0.005
Chloride (mg/L)	250.0	197.6	16.7	250.0	40.0
Copper (mg/L)	1.0	<0.0108	N/A	1.0	<0.01
Fluoride (mg/L)	4.0	0.719	0.05	4.0	0.70
Iron (mg/L)	0.3	<0.05	N/A	0.3	0.07
Mercury (mg/L)	0.002	<0.001	N/A	0.002	<0.001
Manganese (mg/L)	0.05	<0.01	N/A	0.05	0.01
Molybdenum (mg/L)	1.0	<0.1	N/A	1.0	<0.1
Nickel (mg/L)	0.15	<0.05	N/A	0.15	<0.05
Nitrate (mg/L)	10.0	<0.0728	N/A	10.0	<0.1
Lead (mg/L)	0.05	<0.05	N/A	0.05	0.001
Radium (pCi/L)	5.0	165	222.5	611.0	64.0
Selenium (mg/L)	0.05	<0.00115	N/A	0.05	<0.005
Sodium (mg/L)	N/A	428	27.6	4280	138.0
Sulfate (mg/L)	250.0	377.0	13.4	404.0	75.0
Uranium (mg/L)	5.0	0.115	0.158	5.0	0.6020
Vanadium (mg/L)	0.2	<0.1	N/A	0.2	0.2
Zinc (mg/L)	5.0	<0.0131	N/A	5.0	<0.01
pH (Std. Units)	6.5 - 8.5	8.37	0.3	6.5 - 8.5	8.04
Calcium (mg/L)	N/A	13.3	3.1	133.0	7.0
Total Carbonate (mg/L)	N/A	358.7	24.8	592.0	208.0
Potassium (mg/L)	N/A	13.9	4.0	139	5.0
Magnesium (mg/L)	N/A	3.5	0.9	35.0	1.0
TDS (mg/L)	N/A	1183.0	47.4	1183.0	420.0

<sup>1</sup> Standard for Cadmium lowered in modification to UIC permit dated March 9, 2001 following NDEQ approval of Mine Unit 1 restoration.

<sup>2</sup> Title 118 numerical standards in effect at the time the Notice of Intent was filed with the NDEQ.

<sup>3</sup> Restoration values based on Title 118 numerical standards and well field averages at the time the Notice of Intent was submitted to the NDEQ.

N/A = Not Applicable

# **Pore Volume Restoration Analysis**

**Cameco Resources  
Crow Butte Operations  
Dawes County, Nebraska**

April 4, 2013

Prepared By:

**AQUI-VER, INC.**

4800 Wadsworth Boulevard  
Suite 400  
Wheat Ridge, CO 80033 USA

## **Disclaimer and Statement of Confidentiality**

*This study has been prepared on behalf of and for the exclusive use of Cameco Resources and is subject to and issued in accordance with the agreement between Cameco Resources and Aqui-Ver, Inc. This report and information used in preparation is strictly confidential and is intended for use solely by Cameco Resources and their designated representatives. Copying or distribution of this document without the permission of Cameco Resources is not permitted. Aqui-Ver, Inc. accepts no liability or responsibility whatsoever for use of or reliance upon this study by any third party.*

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Attachment	Title
A	Post-Mining Water Quality Results

## 1. EXECUTIVE SUMMARY

Cameco Resources (Cameco) has conducted an analysis to determine the number of pore volumes necessary to restore the production aquifer at the Crow Butte uranium in-situ recovery (ISR) facility near Crawford, Nebraska. Prior to May 2009, groundwater restoration at the site was relatively inefficient, resulting in an excessive number of pore volumes being treated to achieve restoration goals. In order to improve the efficiency of groundwater restoration, Cameco Resources completed a study in 2009 which included the preparation of a comprehensive, model-based restoration plan (MBRP) for mine units MU-2 through MU-5. The MBRP was implemented beginning in May 2009 with full-scale restoration of MU-2, followed by full-scale restoration of MU-3 in December 2009. The efficiency of groundwater restoration has improved significantly since implementation of the MBRP.

Pore volume restoration requirements were calculated by applying the general approach of Zheng et al. (1991, 1992) using the concept of the mixed linear reservoir (MLR) or batch mixing model of Gelhar and Wilson (1974). This methodology has been previously employed to compute pore volume restoration requirements at Cameco's Smith Ranch-Highland facility in Converse County, Wyoming. This analysis was focused on recent groundwater restoration activities completed in MU-2 and MU-3 as part of the MBRP.

Results of the pore volume restoration analysis demonstrate that restoration of MU-2 and MU-3 was accomplished (with the exception of local elevated arsenic concentrations in MU-3) in approximately 6 to 9 months following the implementation of the MBRP. Restoration was achieved after 2.11 pore volumes of groundwater treatment in MU-2, and 0.74 pore volumes of groundwater treatment in MU-3, as computed by the MLR model. The total number of pore volumes treated in MU-2 and MU-3 as part of the MBRP was 2.25 and 1.72, respectively.

Spot treatment in MU-2 and MU-3 continued following full-scale restoration to address localized elevated arsenic and/or vanadium concentrations and to prepare for stability. Recent geochemical evaluations of arsenic and vanadium trends in MU-2 and MU-3 suggest localized elevated concentrations of arsenic and vanadium likely occur due to local over-treatment by injection of RO permeate, resulting in loss of aquifer buffering capacity and increased pH as inorganic carbon is removed (arsenic and vanadium mobility increases with increasing pH in this system). Care will be taken in the future to prevent over-treatment of restored areas to prevent the mobilization of arsenic and vanadium.

Results of the pore volume restoration analysis in MU-2 and MU-3 were expanded to evaluate the number of pore volumes required for future restoration of other mine units at the site. Results of this analysis indicate the theoretical number of pore volumes required to restore a mine unit from the post-mining condition to a fully restored condition at the site is 1.54 (MU-3 analogy) to 3.00 (MU-2 analogy).

The theoretical affected pore volume (APV) calculated from the MLR model is larger than Cameco's calculated APV by a factor of approximately 1.21 (MU-2) to 3.87 (MU-3). The difference between the theoretical and calculated APV represents a combination of uncertainties inherent in Cameco's APV calculations (e.g. estimated flare factor, porosity, pattern area, sand thickness), restoration inefficiencies (although much less than historical inefficiencies), deviation from the theoretical model assumption of complete mixing, and variation in the computed average water quality versus the actual average water quality. If Cameco's calculated APV for MU-2 and MU-3 is used instead of the theoretical APV computed by the MLR model, the total number of pore volumes required to restore groundwater from a post-mining condition to a fully restored condition is 3.63 (more efficient) to 5.96 (less efficient).

The results of this study can be used to compare the relative effectiveness of restoration before and after the implementation of the MBRP. Prior to May 2009 and the implementation of the MBRP in MU-2, more than 35 pore volumes of groundwater were treated as part of restoration activities (using Cameco's calculated APV). Likewise, prior to December 2009 and the implementation of the MBRP in MU-3, more than 59 pore volumes of groundwater were treated as part of restoration activities. Despite the relatively large number of pore volumes treated prior to implementation of the MBRP, MU-2 and MU-3 were only 30 to 50 percent restored, respectively, at the time the MBRP was implemented in May 2009. By comparison, results of this study indicate complete restoration of the production aquifer can be achieved in approximately 3.6 to 6.0 pore volumes using the MBRP and Cameco's calculated APV, a significant improvement in restoration efficiency.

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## 2. INTRODUCTION

Cameco Resources (Cameco) has conducted an analysis to determine the number of pore volumes necessary to restore the production aquifer at the Crow Butte uranium in-situ recovery (ISR) facility (the site). The Crow Butte facility is located near Crawford, Nebraska in Dawes County. This analysis was focused on recent groundwater restoration activities completed in Mine Units 2 and 3 (MU-2 and MU-3) at the site.

### 2.1 Background

Prior to May 2009, groundwater restoration at the site was relatively inefficient, resulting in an excessive number of pore volumes being treated to achieve restoration goals. The primary reasons for the relative inefficiency of past restoration efforts include:

- location of restoration wells and pumping rates were not optimal, resulting in reduced effectiveness and prolonged duration of restoration,
- limited scale of restoration and use of a relatively small number of restoration wells given limited reverse osmosis (RO) treatment and disposal well capacity,
- lack of effective infrastructure to deliver RO permeate to wellfields,
- groundwater treatment using less than efficient methods including excessive groundwater sweep and water transfer,
- incursions of poor quality water into previously restored areas resulting from inefficient management of well pumping and injection rates (e.g. restoration bleed), and
- less management focus on restoration, with associated lack of formal restoration plan and optimization tools (e.g. computer model).

In order to improve the efficiency of groundwater restoration, Cameco Resources completed a study which included the preparation of a comprehensive, model-based restoration plan (MBRP) for mine units MU-2 through MU-5 at the site (WorleyParsons, 2009). The MBRP included the development and application of a three-dimensional groundwater flow and transport model for the purpose of optimizing restoration well locations, injection and extraction rates, and the overall restoration sequence for each mine unit. RO treatment capacity was also expanded to allow full-scale restoration of multiple wellhouses and/or mine units. The MBRP was implemented beginning in May 2009 with full-scale restoration of MU-2, followed by full-scale restoration of MU-3 in December 2009. The efficiency of groundwater restoration has improved significantly since implementation of the MBRP, as demonstrated in the following sections.

### 2.2 Purpose and Scope

The purpose of this analysis was to determine the number of pore volumes required to restore the production aquifer at the site based on results of the recent restoration of MU-2 and MU-3 as an example. The analysis included performance of the following tasks, described in detail in **Sections 3 and 4** of this report:

- develop a theoretical pore volume restoration curve for a conservative chemical constituent (e.g. chloride) in MU-2 and MU-3,
- compare the theoretical pore volume restoration curve to observed chloride concentrations during restoration,

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- calculate the theoretical Affected Pore Volume (APV),
- calculate retardation factors for non-conservative constituents of concern,
- develop theoretical pore volume restoration curves for remaining constituents of concern,
- compare theoretical restoration curves to observed concentration decline during restoration, and
- calculate the number of pore volumes required to restore a typical ISR wellfield.

### 3. MINE UNIT 2 AND 3 RESTORATION AND WATER QUALITY

This analysis was focused on recent groundwater restoration activities completed as part of the MBRP in MU-2 and MU-3 (**Figure 3-1**). Historical groundwater sampling results (Guideline 8 analyses) from MU-2 and MU-3 were obtained from Cameco for this study. Water quality data were available for 12 wells in MU-2 and 13 wells in MU-3 for this analysis. Average concentrations were calculated using groundwater analytical data reported for individual wells completed in the production aquifer in each mine unit, and are assumed to be representative of the average groundwater quality in each mine unit. This assumption is supported by the close agreement between calculated average concentrations and results of composite samples analyzed periodically during the restoration period. **Tables 3-1 and 3-2** summarize the average concentration calculated for constituents of concern in MU-2 and MU-3, respectively.

#### 3.1 Mine Unit 2 Restoration

Full-scale groundwater restoration in MU-2 was conducted between May 2009 and March 2010 (11 months) in general accordance with the MBRP (WorleyParsons, 2009). Restoration during this period was conducted by groundwater extraction, treatment by Reverse Osmosis (RO), and injection of treated groundwater back into the production aquifer. The groundwater extraction/RO treatment rate in MU-2 is illustrated in **Figure 3-2**.

As shown in **Table 3-1**, groundwater in MU-2 was fully restored (e.g. had meet applicable NDEQ restoration standards) in January 2010 after nine months of full-scale restoration. Full-scale restoration continued for several months following January 2010, with concentrations of most chemical constituents continuing to decline for the duration of full-scale restoration. Restoration activities in MU-2 continued after March 2010, but restoration was not full-scale and was limited to spot treatment of specific areas having somewhat elevated concentrations of arsenic and/or vanadium, as shown by the reduced groundwater extraction rate in **Figure 3-2**. **Table 3-3** summarizes the volume of groundwater extracted and treated by RO in MU-2 during restoration.

#### 3.2 Mine Unit 3 Restoration

Full-scale groundwater restoration in MU-3 was conducted between December 2009 and October 2011 (22 months) in general accordance with the MBRP (WorleyParsons, 2009). Restoration during this period was conducted by groundwater extraction, treatment by Reverse Osmosis (RO), and injection of treated groundwater back into the production aquifer. The groundwater extraction/RO treatment rate in MU-3 is illustrated in **Figure 3-3**. A significant decrease in flow occurred in October 2010, although restoration was still considered full-scale given the large number and wide distribution of wells being operated from October 2010 through October 2011.

As shown in **Table 3-2**, groundwater in MU-3 was fully restored with the exception of elevated average arsenic concentrations in May 2010 after six months of full-scale restoration. Full-scale restoration activities continued for approximately 16 months after May 2010, with concentrations of most constituents continuing to decline for the duration of full-scale restoration. Restoration activities in MU-3 continued after October 2011, but restoration was not full-scale and limited to spot treatment of specific areas having somewhat elevated concentrations of arsenic and/or vanadium, as shown by the reduced groundwater extraction rate in **Figure 3-3**. **Table 3-4** summarizes the volume of groundwater extracted and treated by RO in MU-3 during restoration.

TABLE 3-1  
MU-2 Average Concentrations of Constituents of Concern in Groundwater

Sample Date	Units	Carbonate	Calcium	Chloride	Fluoride	Magnesium	Nitrogen Ammonia	Potassium	Sodium	Sulfate	pH	TDS	Arsenic	Barium	Cadmium	Copper	Iron	Lead	Manganese	Mercury	Molybdenum	Nickel	Selenium	Uranium	Vanadium	Zinc	Radium 226
NDEQ Restoration Value		585	134	250	4	35	10	126	4108	369	6.5-8.5	1170.4	0.05	1	0.005	1	0.3	0.050	0.05	0.002	1	0.15	0.050	5	0.2	5	1058
Apr-07	mg/l	—	35.67	259.78	0.36	8.11	—	14.23	478.63	458.33	7.92	1521.56	0.018	—	—	—	0.10	—	0.10	—	0.18	—	0.002	3.81	0.70	0.01	335.43
Nov-09	mg/l	6.00	8.80	62.67	0.72	3.00	—	5.83	176.83	110.83	8.33	476.33	0.032	—	—	—	0.11	0.003	0.02	—	0.15	—	0.002	1.61	0.23	—	216.50
Jan-10	mg/l	9.00	5.00	33.60	0.70	2.00	—	4.80	112.40	59.80	8.10	308.80	0.040	—	—	—	0.10	0.007	0.03	—	—	—	0.001	0.29	0.20	0.02	271.80
Mar-10	mg/l	9.00	3.17	27.29	0.77	1.00	0.06	3.57	108.00	51.43	8.01	314.29	0.033	—	—	—	0.37	0.004	0.02	—	—	—	—	0.46	0.23	—	91.71
Jun-10	mg/l	7.00	13.11	28.78	0.68	4.33	0.06	4.67	93.89	49.11	7.85	300.89	0.031	0.060	—	0.01	0.33	0.005	0.02	—	0.10	—	0.002	0.35	0.30	0.03	116.22
Jul-10	mg/l	—	2.63	33.25	0.67	1.00	—	3.75	110.75	57.50	7.39	286.75	0.037	—	—	—	0.40	0.003	0.02	—	—	—	0.001	0.23	0.25	0.01	98.13
Oct-10	mg/l	7.00	3.00	38.25	1.54	1.00	—	3.63	113.63	64.75	8.13	319.88	0.038	—	—	—	0.25	0.002	0.02	—	0.10	—	—	0.24	0.20	0.01	66.00
Apr-11	mg/l	6.20	4.90	54.00	1.21	1.60	—	5.40	154.90	99.30	8.04	428.30	0.026	—	—	—	0.18	0.002	0.02	—	0.13	—	—	0.50	0.20	0.02	119.10
Jun-11	mg/l	6.25	6.33	59.78	0.51	1.75	0.06	5.44	162.56	108.44	8.11	482.11	0.026	—	—	—	0.15	0.001	0.02	—	0.15	—	0.002	0.79	0.20	—	130.58
Jul-11	mg/l	5.50	6.44	59.33	0.51	2.00	—	5.89	181.22	112.44	8.06	489.67	0.026	—	—	—	0.19	—	0.03	—	0.15	—	0.002	0.63	0.20	0.05	102.57
Aug-11	mg/l	4.71	7.00	63.78	0.48	1.67	—	5.89	171.67	121.33	8.01	535.78	0.026	—	—	—	0.15	—	0.02	—	0.15	—	—	0.77	0.20	0.01	134.98
Sep-11	mg/l	4.67	7.22	68.22	0.47	1.67	—	6.67	183.11	129.44	7.88	560.78	0.024	—	—	—	0.13	—	0.02	—	0.13	—	0.002	0.92	0.10	—	133.79
Oct-11	mg/l	5.50	8.00	70.89	0.48	1.86	0.05	6.67	209.22	134.56	7.81	577.33	0.021	—	—	—	0.25	—	0.02	—	0.13	—	0.002	0.97	0.10	0.02	121.29
Nov-11	mg/l	5.40	6.67	66.22	0.54	2.00	0.05	7.00	194.67	127.44	7.78	573.89	0.024	—	—	—	0.22	—	0.02	—	0.14	—	0.002	0.79	0.10	—	115.03
Dec-11	mg/l	5.00	6.67	70.00	0.44	2.00	—	6.33	183.11	134.67	7.84	531.22	0.021	—	—	—	0.16	0.002	0.02	—	0.12	—	0.006	0.72	—	—	116.91
Jan-12	mg/l	4.00	5.56	55.33	0.56	1.75	0.05	5.78	162.67	109.89	8.01	460.44	0.022	—	—	0.01	0.15	0.005	0.03	0.001	0.14	—	0.002	0.53	0.10	0.03	93.72
Feb-12	mg/l	4.00	6.22	59.78	0.58	2.25	—	6.22	174.56	118.00	7.95	493.44	0.024	—	—	0.01	0.19	0.004	0.02	—	0.14	—	0.002	0.44	0.20	0.02	133.49
Mar-12	mg/l	5.00	6.88	55.22	0.61	2.00	0.06	6.00	165.67	108.11	8.02	491.56	0.023	—	—	0.02	0.15	0.006	0.03	—	0.15	—	0.003	0.42	0.20	0.01	155.59
Apr-12	mg/l	7.00	6.50	49.89	0.60	2.33	—	5.56	152.00	98.11	8.01	447.78	0.025	—	—	0.02	0.16	0.006	0.03	—	0.17	—	0.004	0.42	0.20	—	228.66
May-12	mg/l	63.75	12.38	41.64	0.60	1.50	—	6.00	152.78	95.89	8.01	433.11	0.091	—	—	0.02	0.17	0.014	0.05	—	0.20	—	0.090	1.47	0.18	—	193.96
Jun-12	mg/l	4.50	5.75	43.33	0.67	1.50	0.13	5.33	149.89	90.00	8.03	413.67	0.023	—	—	0.03	0.22	0.006	0.03	—	0.20	—	—	0.40	0.15	—	122.61
Jul-12	mg/l	6.00	5.50	46.78	0.69	1.75	—	5.44	142.33	90.22	8.01	399.67	0.024	—	—	0.02	0.17	0.005	0.04	—	0.20	—	0.001	0.44	0.20	0.01	223.33
Aug-12	mg/l	7.00	5.57	42.11	0.73	1.67	0.05	4.56	131.89	84.22	8.09	385.22	0.028	—	—	0.02	0.18	0.004	0.03	—	0.20	—	0.002	0.41	0.30	—	136.27
Sep-12	mg/l	5.33	5.57	39.67	0.69	1.33	—	4.78	127.11	80.00	8.09	366.33	0.028	—	—	0.02	0.21	0.004	0.04	—	0.20	—	0.002	0.39	0.30	—	133.26

Full-Scale Restoration Period

Notes:

1. Excluded 8/4/2010 and 11/2/2010 sampling events (only one well sampled).
2. Excluded wells I180P, P113 and P97 after March 2010 (wells impacted by incursion after complete restoration).
3. Red Font = exceeded NDEQ Restoration Value
4. — = not analyzed

TABLE 3-2  
MU-3 Average Concentrations of Constituents of Concern in Groundwater

Sample Date	Units	Carbonate	Calcium	Chloride	Fluoride	Magnesium	Nitrogen Ammonia	Potassium	Sodium	Sulfate	pH	TDS	Arsenic	Barium	Cadmium	Copper	Iron	Lead	Manganese	Mercury	Molybdenum	Nickel	Selenium	Uranium	Vanadium	Zinc	Radium 226
NDEQ Restoration Value		592	133	250	4	35	10	139	4280	404	6.5-8.5	1183	0.05	1	0.005	1	0.3	0.050	0.05	0.002	1	0.15	0.050	5	0.2	5	611
Nov-09	mg/l	6.50	38.25	296.25	0.58	9.50	0.08	19.75	594.00	469.25	8.19	1800.00	0.05	—	—	—	0.08	0.002	0.08	—	0.25	—	0.004	8.78	0.37	—	477.50
Dec-09	mg/l	—	41.67	304.67	0.50	10.67	0.06	20.67	642.00	468.33	8.01	1770.00	0.02	—	—	—	0.04	—	0.06	0.002	0.23	—	0.002	6.01	0.40	0.01	327.67
May-10	mg/l	—	14.50	130.50	0.85	3.50	0.07	10.50	357.50	230.50	7.81	976.50	0.15	—	—	—	0.03	—	0.03	—	0.40	—	0.001	2.07	0.20	0.04	263.00
Sep-10	mg/l	11.33	13.78	106.33	0.93	3.63	0.13	10.33	295.44	174.44	7.99	828.67	0.06	—	—	—	0.12	0.003	0.03	0.001	0.20	—	0.002	3.40	0.35	—	209.33
Apr-11	mg/l	7.25	9.25	72.38	0.99	5.00	0.15	8.00	226.38	126.88	8.04	596.88	0.07	—	—	0.01	0.09	0.002	0.02	—	0.13	—	0.001	1.29	0.38	0.01	102.30
Jun-11	mg/l	5.83	6.40	62.82	0.85	2.40	0.09	6.09	189.09	113.73	8.25	538.09	0.07	—	—	—	0.07	0.001	0.02	—	0.13	—	0.003	0.99	0.47	—	44.62
Jul-11	mg/l	5.40	5.80	57.00	0.83	2.50	0.12	6.09	187.09	101.91	8.06	501.09	0.05	—	—	—	0.07	—	0.03	—	0.12	—	0.005	0.79	0.40	0.07	74.01
Aug-11	mg/l	6.00	5.30	54.09	0.82	2.33	0.12	6.00	172.55	99.09	8.07	479.36	0.06	—	—	—	0.07	0.001	0.03	—	0.13	—	0.012	0.73	0.40	—	50.04
Sep-11	mg/l	7.00	5.80	58.55	0.76	3.00	0.14	6.00	170.45	102.09	8.04	503.09	0.06	—	—	—	0.08	—	0.03	—	0.13	—	0.003	0.70	0.41	—	41.39
Oct-11	mg/l	7.67	6.50	54.64	0.75	2.75	0.12	6.60	172.73	95.09	8.11	484.45	0.05	—	—	—	0.10	0.003	0.02	0.001	0.14	—	0.004	0.67	0.40	0.02	44.22
Nov-11	mg/l	7.33	6.50	54.09	0.77	3.00	0.11	6.70	172.09	95.64	8.04	500.00	0.05	—	—	—	0.17	0.003	0.03	—	0.14	—	0.002	0.65	0.40	—	56.38
Dec-11	mg/l	6.00	6.80	55.73	0.74	3.00	0.11	6.40	163.45	99.91	7.96	475.09	0.05	—	—	—	0.06	0.002	0.03	—	0.14	—	0.002	0.58	0.33	—	63.17
Jan-12	mg/l	7.33	7.30	55.64	0.85	3.75	0.10	6.30	168.64	100.45	8.10	477.91	0.05	—	—	—	0.08	0.002	0.03	—	0.18	—	0.003	0.67	0.40	0.02	56.03
Feb-12	mg/l	7.00	7.30	53.18	0.87	3.25	0.12	6.80	168.18	95.36	8.10	472.27	0.05	—	—	—	0.07	0.002	0.03	—	0.16	—	0.003	0.61	0.40	0.01	46.05
Mar-12	mg/l	8.50	8.50	58.00	0.86	5.33	0.11	7.00	177.18	104.27	8.12	526.45	0.05	—	—	0.01	0.07	0.002	0.03	—	0.20	—	0.003	0.80	0.37	0.01	88.05
Apr-12	mg/l	10.00	7.20	51.73	0.84	5.00	0.12	6.78	155.91	92.91	8.12	475.45	0.05	—	—	—	0.06	0.002	0.02	—	0.15	—	0.003	0.62	0.37	—	83.69
May-12	mg/l	9.33	7.60	50.45	0.88	4.00	0.17	6.60	162.55	91.55	8.08	461.73	0.11	—	—	—	0.07	0.003	0.02	0.002	0.17	—	0.145	0.88	0.36	—	51.71
Jun-12	mg/l	6.00	7.40	49.18	0.92	3.50	0.16	6.89	167.09	90.27	8.21	469.00	0.05	—	—	—	0.08	0.002	0.03	—	0.20	—	0.006	0.53	0.43	—	63.75
Jul-12	mg/l	9.00	7.64	53.42	0.90	4.00	0.14	6.18	165.92	91.33	8.12	457.25	0.05	—	—	0.01	0.08	0.004	0.03	0.002	0.20	—	0.004	0.54	0.41	0.01	100.48
Aug-12	mg/l	5.00	7.55	53.08	0.89	4.00	0.12	6.18	162.67	96.50	8.14	471.08	0.05	—	—	0.01	0.09	0.005	0.03	—	0.20	—	0.004	0.62	0.41	—	197.93
Sep-12	mg/l	9.67	8.09	54.75	0.84	4.25	0.24	5.67	166.42	100.08	8.13	480.75	0.05	—	—	0.01	0.07	0.005	0.03	—	0.18	—	0.006	0.68	0.37	—	117.91

Full-Scale Restoration Period

- Notes:
1. Excluded wells P246 and P217 in average calculations (initial concentrations at or near baseline chloride concentration at onset of full-scale restoration (<50 mg/L).
  2. Excluded February 2010 and June 2010 sampling events (only 2 wells sampled) from average calculations.
  3. Red Font = exceeded NDEQ Restoration Value
  4. — = not analyzed

**TABLE 3-3**  
**MU-2 Volume of Groundwater Treated During Restoration**

Date	MU-2 RO (gallons)
May-09	2,327,993
Jun-09	11,135,811
Jul-09	9,714,166
Aug-09	7,542,964
Sep-09	4,588,780
Oct-09	5,954,106
Nov-09	6,068,685
Dec-09	4,061,045
Jan-10	3,920,318
Feb-10	1,987,572
Mar-10	1,569,100
Apr-10	1,259,559
May-10	1,272,850
Jun-10	1,286,686

**Full-Scale Restoration Period**

Notes:

1. RO = Reverse Osmosis

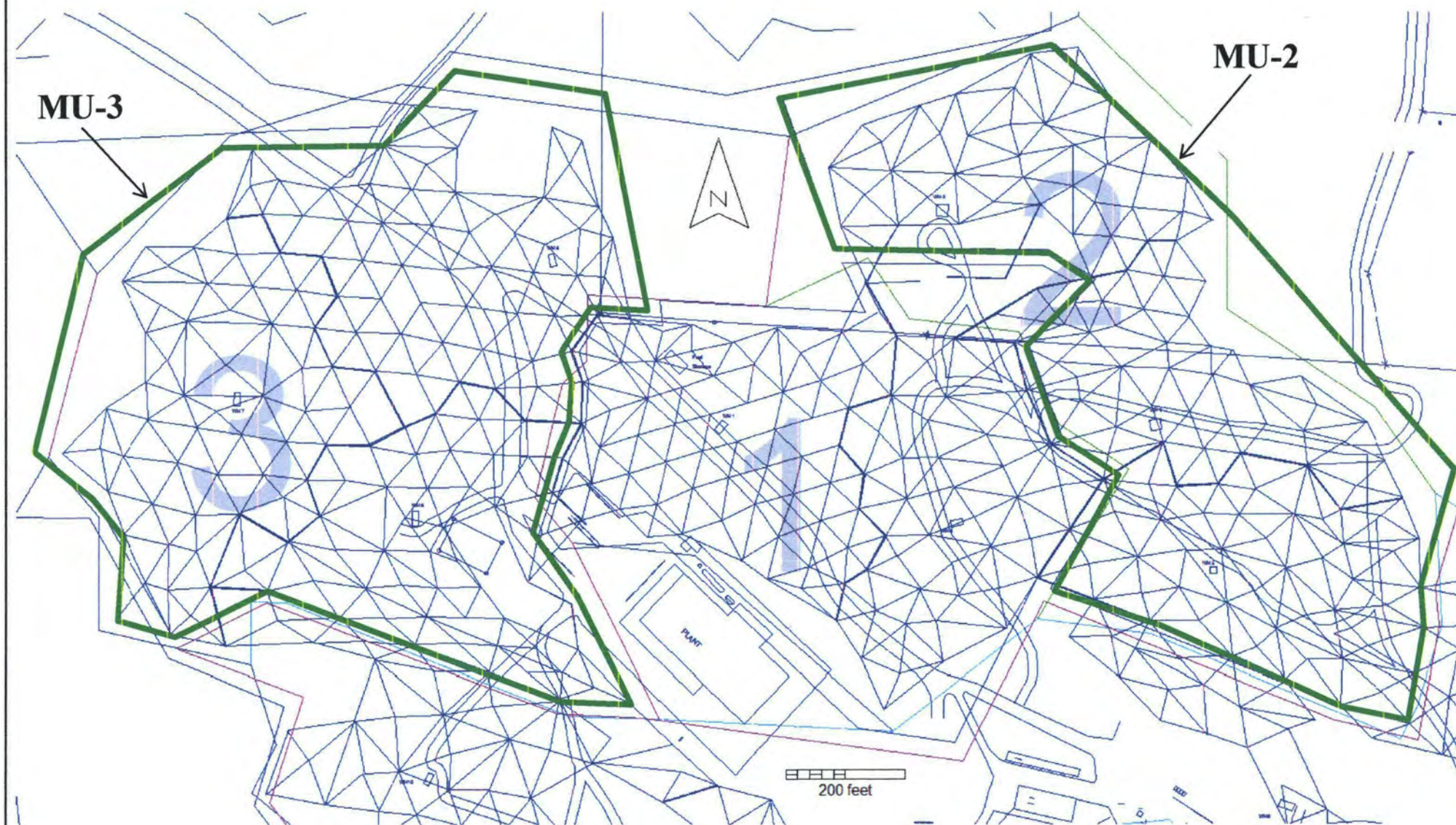
**TABLE 3-4**  
**MU-3 Volume of Groundwater Treated During Restoration**

Date	MU-3 RO (gallons)
Dec-09	9,241,922
Jan-10	8,486,645
Feb-10	7,709,118
Mar-10	8,710,379
Apr-10	10,108,820
May-10	10,179,871
Jun-10	8,492,464
Jul-10	8,686,296
Aug-10	9,193,635
Sep-10	5,549,331
Oct-10	7,257,347
Nov-10	1,571,039
Dec-10	1,932,584
Jan-11	2,942,281
Feb-11	3,540,161
Mar-11	3,871,855
Apr-11	3,382,771
May-11	1,764,783
Jun-11	3,211,305
Jul-11	3,224,826
Aug-11	3,236,451
Sep-11	3,463,516
Oct-11	3,347,188
Nov-11	1,830,082
Dec-11	1,723,149
Jan-12	1,332,812

**Full-Scale Restoration Period**

**Notes:**

1. RO = Reverse Osmosis

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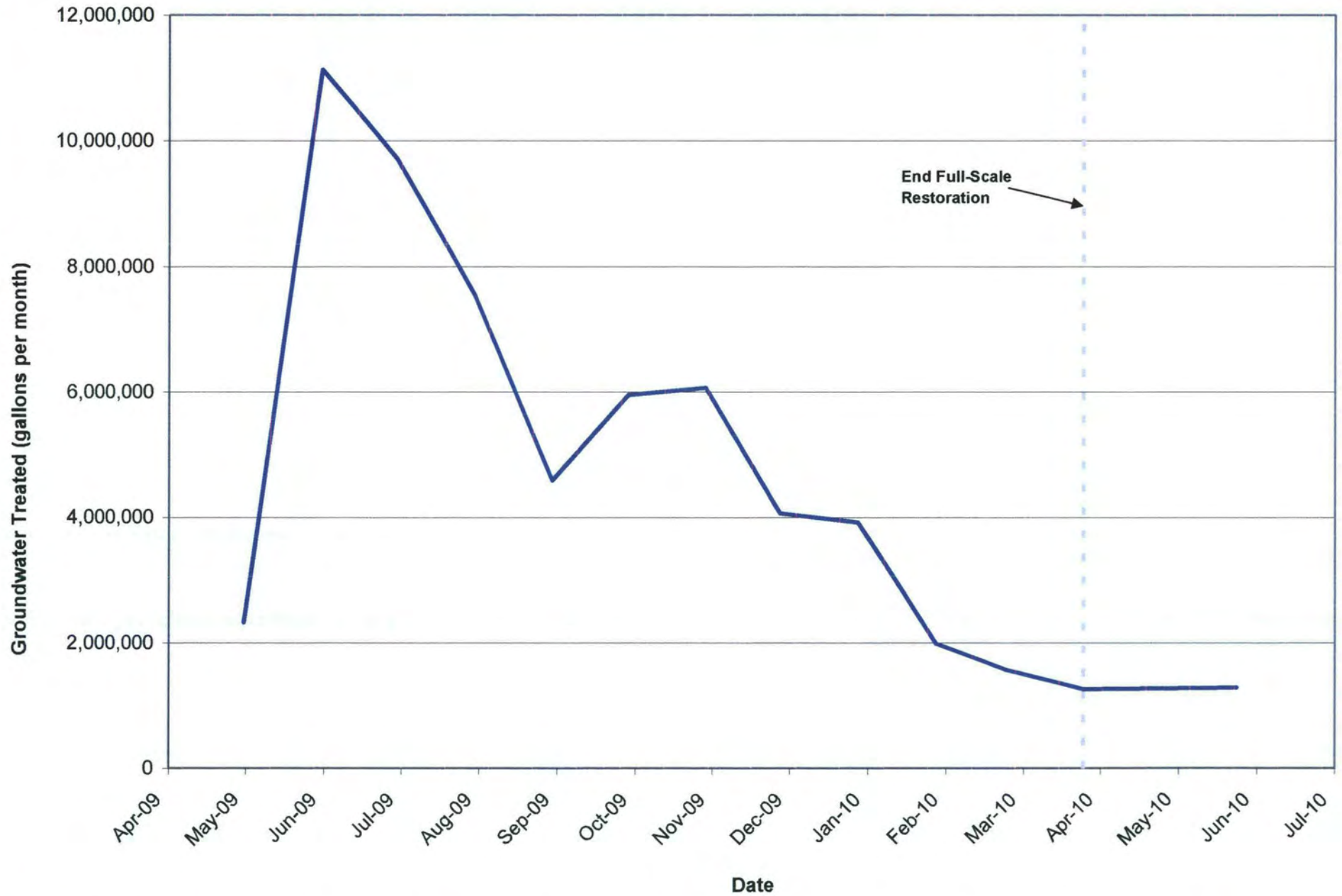
**Mine Units MU-2 and MU-3**

Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska



FIGURE

**3-1**

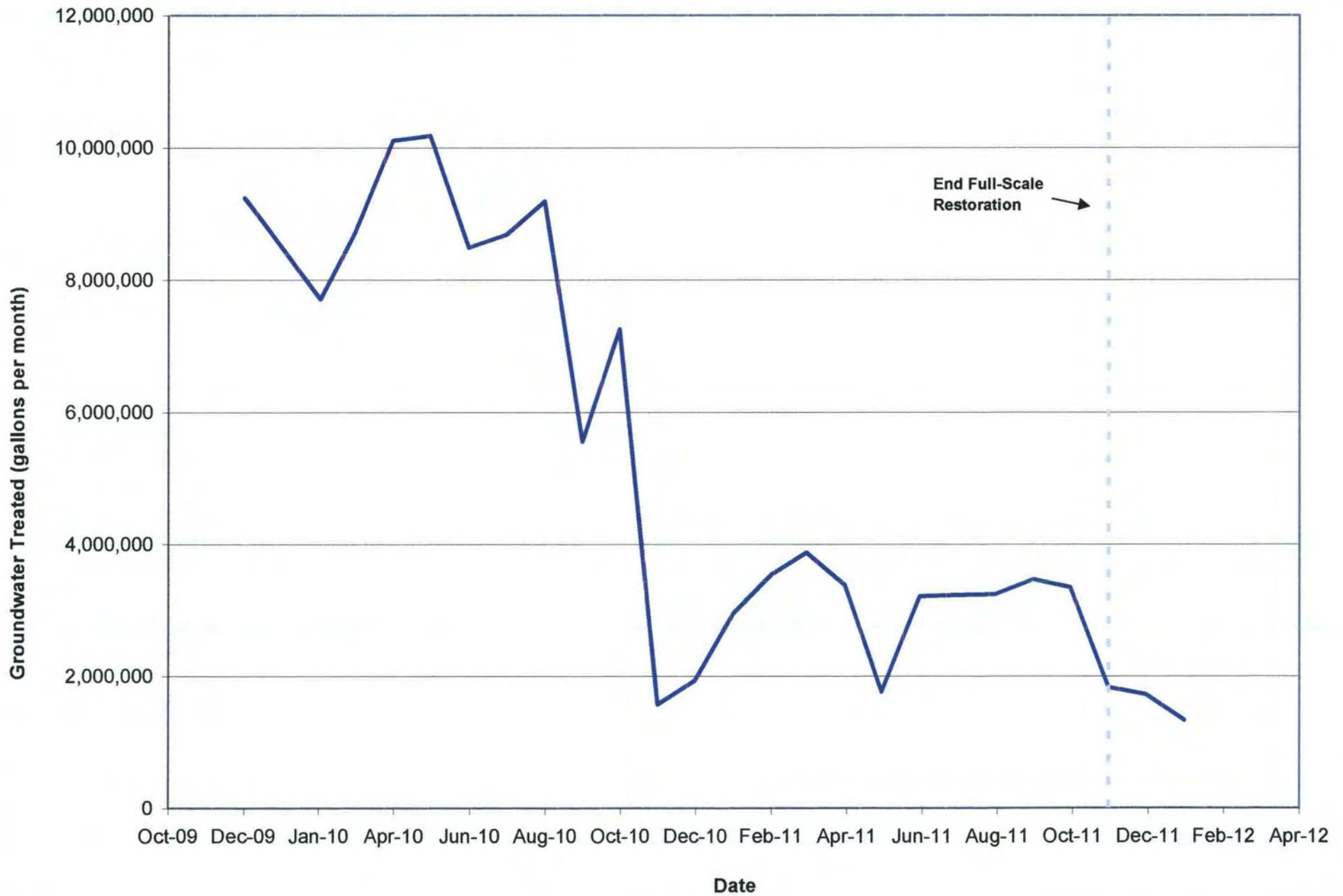
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Hydrogeology, Water Resources &amp; Data Services

**MU-2 Groundwater Extraction  
and RO Treatment Rate**Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska

FIGURE

**3-2**

**AQUI-VER, INC.**

Hydrogeology, Water Resources &amp; Data Services

**MU-3 Groundwater Extraction  
and RO Treatment Rate**Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska

FIGURE

**3-3**

## 4. PORE VOLUME RESTORATION MODELING

Pore volume restoration requirements were calculated by applying the general approach of Zheng et al. (1991, 1992) using the concept of the mixed linear reservoir (MLR) or batch mixing model of Gelhar and Wilson (1974). This methodology has been previously employed to compute pore volume restoration requirements at Cameco's Smith Ranch-Highland facility in Converse County, Wyoming (Lewis Water Consultants, 1999). The MLR model is based on the simple principle that an affected aquifer can be represented as a fully mixed solution at some average concentration. The concentration of this solute then changes instantaneously in response to changes in inflow, outflow, and solute mass.

### 4.1 Mixed Linear Reservoir (MLR) Model

The number of pore volumes (Npv) required to reduce the initial concentration (Ci) of a dissolved chemical constituent to a lesser or final concentration (Cs) based on the MLR model is given by:

$$Npv = -R \ln (Cs/Ci) \quad (1)$$

Where R is the retardation factor, which is a measure of chemical attenuation within the aquifer. For a conservative or non-reactive chemical constituent such as chloride, R equals 1.0.

**Figures 4-1 and 4-2** compare the modeled and observed chloride pore volume restoration curves for MU-2 and MU-3, respectively. In general, modeled and observed pore volume restoration curves compare favorably for the duration of full-scale restoration. Given an initial chloride concentration of 259.78 mg/L, a final chloride concentration of 27.29 mg/L in March 2010, the total number of pore volumes treated in MU-2 as part of the MBRP was 2.25. Likewise, given an initial chloride concentration of 304.67 mg/L, a final chloride concentration of 54.64 mg/L in October 2011, the total number of pore volumes treated in MU-3 as part of the MBRP was 1.72.

Given the total number of pore volumes treated, retardation factors for other non-conservative chemical constituents can be calculated by rearranging equation (1) and solving for R. **Tables 4-1 and 4-2** summarize calculated R values for constituents of concern for MU-2 and MU-3, respectively. R values less than one are calculated for some dissolved metals, which is interpreted to represent accelerated restoration due to the injection of sodium sulfide and associated metal reduction, or other geochemical reactions. **Figures 4-3 through 4-12** compare the resulting modeled and observed pore volume restoration curves in MU-2 for 10 constituents of concern. Similarly, **Figures 4-13 through 4-22** compare the resulting modeled and observed pore volume restoration curves in MU-3 for 10 constituents of concern. It is not possible to compute pore volume restoration curves for constituents with initial and final concentrations that were increasing or near the detection limit during the restoration period.

### 4.2 Affected Pore Volume Calculations

A benefit of the MLR model is the ability to calculate the affected pore volume (APV) as:

$$APV = TV/Npv \quad (2)$$

where TV is the total volume of groundwater extracted as part of the MBRP. For example, given a total volume of groundwater extracted as part of the MBRP of 58,870,540 gallons and 2.25 pore volumes treated from equation (1), the theoretical APV for MU-2 from equation (2) is 26,164,684 gallons. By comparison, Cameco's calculated APV for MU-2 is 21,622,000 gallons. Similarly, given a total volume of groundwater extracted as part of the MBRP of 126,861,972 gallons and 1.72 pore volumes treated, the theoretical APV

for MU-3 is 73,756,960 gallons. Cameco's calculated APV for MU-3 is 19,073,000. The difference between the theoretical and calculated APV's represents a combination of uncertainties including:

- uncertainty in Cameco's APV calculations (e.g. estimated flare factor, porosity, pattern area, sand thickness),
- restoration inefficiency (although much less than historical inefficiencies described in 2.1), including over-treatment of restored areas and areas bordering MU-2 and MU-3 (e.g. injection fence along boundary with MU-4, restored areas bordering MU-1),
- deviation from the theoretical model assumption of complete mixing (e.g. variability in water quality across the mine unit), and
- uncertainty in the computed average water quality (e.g. sampling a large number of wells will better approximate the average water quality than sampling a small number of wells).

### **4.3 Summary of Pore Volume Restoration Analysis in MU-2 and MU-3**

Results of the pore volume analysis in MU-2 and MU-3 demonstrate that restoration of these mine units was accomplished (with the exception of local elevated arsenic concentrations in MU-3) in approximately 6 to 9 months following the implementation of the MBRP. Restoration was achieved after 2.11 pore volumes of groundwater treatment in MU-2, and 0.74 pore volumes of groundwater treatment in MU-3. The total number of pore volumes treated in MU-2 and MU-3 as part of the MBRP was 2.25 and 1.72, respectively.

Spot treatment in MU-2 and MU-3 continued following full-scale restoration to address localized elevated arsenic and/or vanadium concentrations and to prepare for stability. Recent geochemical evaluations of arsenic and vanadium trends in MU-2 and MU-3 suggest localized elevated concentrations of arsenic and vanadium likely occur due to local over-treatment by injection of RO permeate, resulting in loss of aquifer buffering capacity and increased pH as inorganic carbon is removed (arsenic and vanadium mobility increases with increasing pH in this system). Care will be taken in the future to prevent over-treatment of restored areas to prevent the mobilization of arsenic and vanadium.

**TABLE 4-1**  
**Calculated Retardation Factors (R Values) in MU-2**

Constituent	Ci (mg/l)	Cs (mg/l)	Cs/Ci	LN (Cs/Ci)	Npv	R
Ammonia	NA	NA	NA	NA	2.25	NA
Arsenic	0.018	0.033	1.857	0.62	2.25	NC
Barium	NA	NA	NA	NA	2.25	NA
Cadmium	NA	NA	NA	NA	2.25	NA
Chloride	259.78	27.29	0.105	-2.25	2.25	1.00
Copper	NA	NA	NA	NA	2.25	NA
Fluorine	0.36	0.77	2.156	0.77	2.25	NC
Iron	0.10	0.37	3.761	1.32	2.25	NC
Mercury	NA	NA	NA	NA	2.25	NA
Manganese	0.10	0.02	0.208	-1.57	2.25	1.43
Molybdenum	NA	NA	NA	NA	2.25	NA
Nickel	NA	NA	NA	NA	2.25	NA
Nitrate as N	NA	NA	NA	NA	2.25	NA
Lead	NA	NA	NA	NA	2.25	NA
Radium 226	335.43	91.71	0.273	-1.30	2.25	1.74
Selenium	0.002	0.001	0.625	-0.47	2.25	NC
Sodium	478.63	108.00	0.226	-1.49	2.25	1.51
Sulfate	458.33	51.43	0.112	-2.19	2.25	1.03
Uranium	3.81	0.46	0.120	-2.12	2.25	1.06
Vanadium	0.70	0.23	0.333	-1.10	2.25	2.05
Zinc	NA	NA	NA	NA	2.25	NA
Calcium	35.67	3.17	0.089	-2.42	2.25	0.93
Carbonate	NA	NA	NA	NA	2.25	NA
Potassium	14.23	3.57	0.251	-1.38	2.25	1.63
Magnesium	8.11	1.00	0.123	-2.09	2.25	1.07
Total Dissolved Solids	1521.56	314.29	0.207	-1.58	2.25	1.43

Notes:

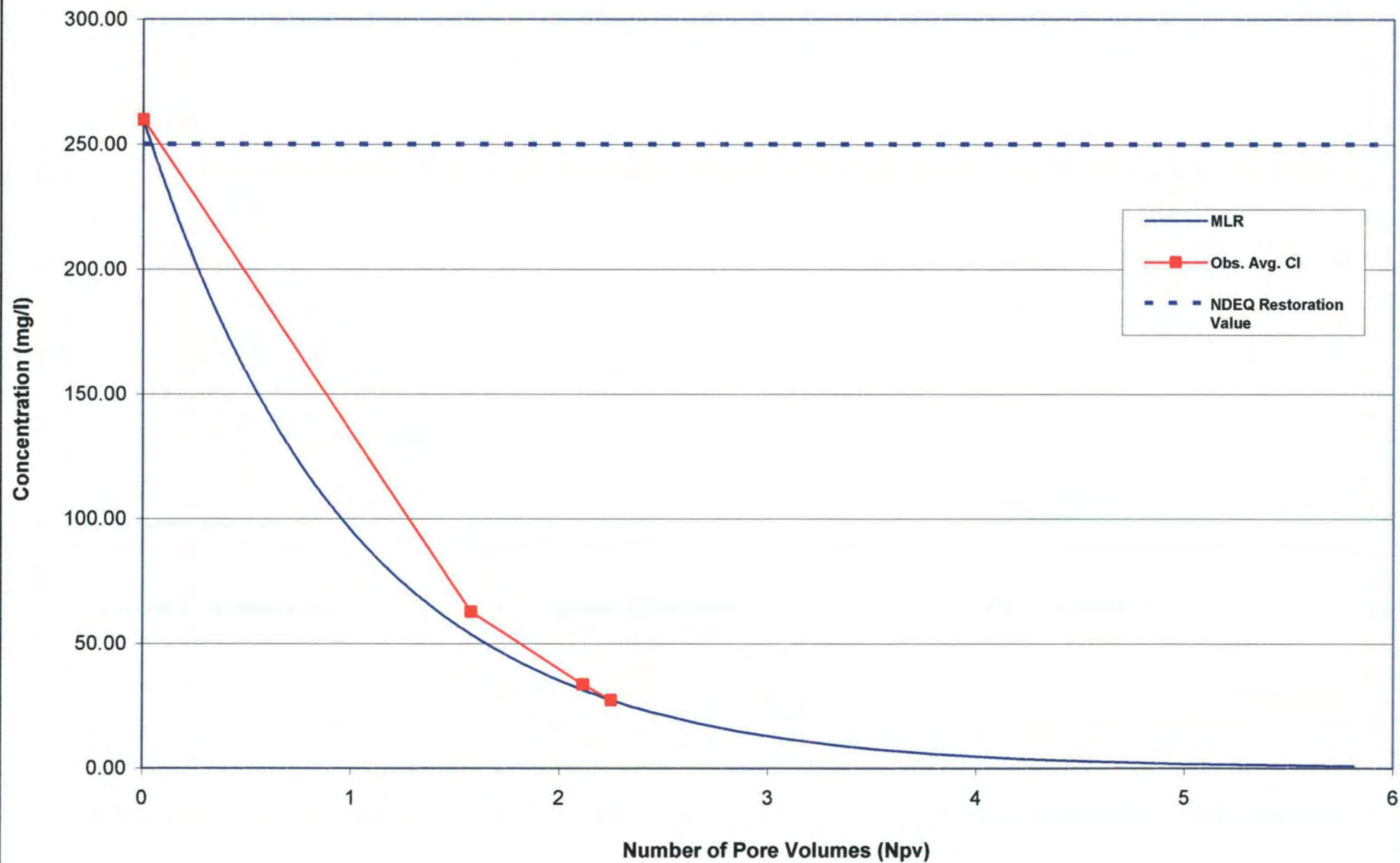
1. NC = not calculated due to steady or increasing concentrations, or concentrations near or below the detection limit.
2. NA = not applicable due to no available or limited groundwater sample data.
3. Ci = average initial concentration at the beginning of full-scale restoration.
4. Cs = average concentration at the end of full scale restoration.
5. Npv = number of pore volumes.
6. R (retardation factor) = - Npv / LN (Cs/Ci).
7. mg/l = milligrams per liter.

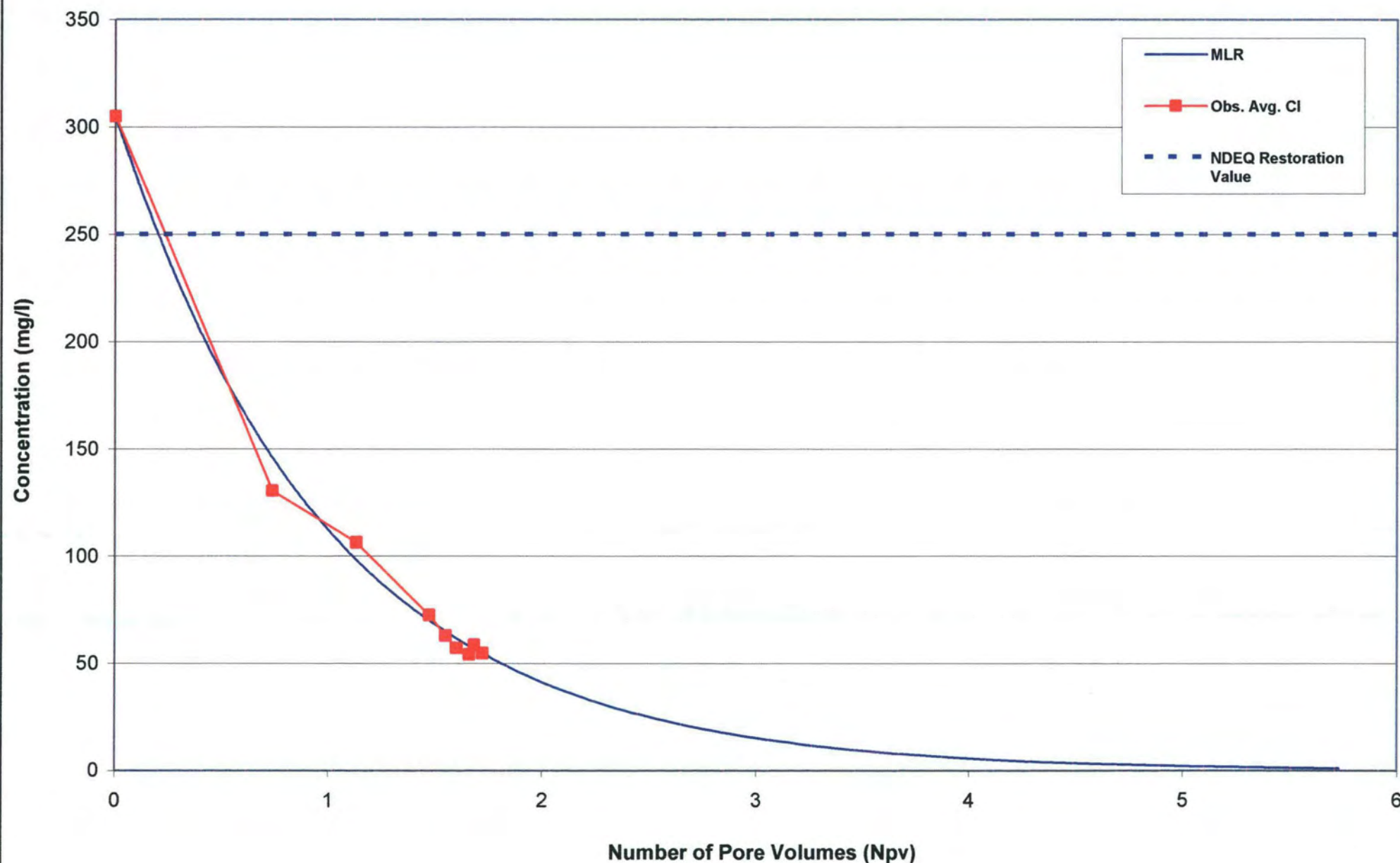
**TABLE 4-2**  
**Calculated Retardation Factors (R Values) in MU-3**

Constituent	Ci (mg/l)	Cs (mg/l)	Cs/Ci	LN (Cs/Ci)	Npv	R
Ammonia	0.06	0.11	2.000	0.69	1.72	NC
Arsenic	0.02	0.05	2.143	0.76	1.72	NC
Barium	NA	NA	NA	NA	1.72	NA
Cadmium	NA	NA	NA	NA	1.72	NA
Chloride	304.67	54.64	0.179	-1.72	1.72	1.00
Copper	NA	NA	NA	NA	1.72	NA
Fluorine	0.50	0.75	1.491	0.40	1.72	NC
Iron	0.04	0.10	2.673	0.98	1.72	NC
Mercury	NA	NA	NA	NA	1.72	NA
Manganese	0.06	0.02	0.353	-1.04	1.72	1.65
Molybdenum	0.23	0.14	0.600	-0.51	1.72	3.37
Nickel	NA	NA	NA	NA	1.72	NA
Nitrate as N	NA	NA	NA	NA	1.72	NA
Lead	NA	NA	NA	NA	1.72	NA
Radium 226	327.67	44.22	0.135	-2.00	1.72	0.86
Selenium	0.002	0.004	2.667	0.98	1.72	NC
Sodium	642.00	172.73	0.269	-1.31	1.72	1.31
Sulfate	468.33	95.09	0.203	-1.59	1.72	1.08
Uranium	6.01	0.67	0.111	-2.20	1.72	0.78
Vanadium	0.40	0.40	1.000	0.00	1.72	NC
Zinc	NA	NA	NA	NA	1.72	NA
Calcium	41.67	6.50	0.156	-1.86	1.72	0.93
Carbonate	NA	NA	NA	NA	1.72	NA
Potassium	20.67	6.60	0.319	-1.14	1.72	1.51
Magnesium	10.67	2.75	0.258	-1.36	1.72	1.27
Total Dissolved Solids	1,770.00	484.45	0.274	-1.30	1.72	1.33

**Notes:**

1. NC = not calculated due to steady or increasing concentrations, or concentrations near or below the detection limit.
2. NA = not applicable due to no available or limited groundwater sample data.
3. Ci = average initial concentration at the beginning of full-scale restoration.
4. Cs = average concentration at the end of full-scale restoration.
5. Npv = number of pore volumes.
6. R (retardation factor) = - Npv / LN (Cs/Ci).
7. mg/l = milligrams per liter.



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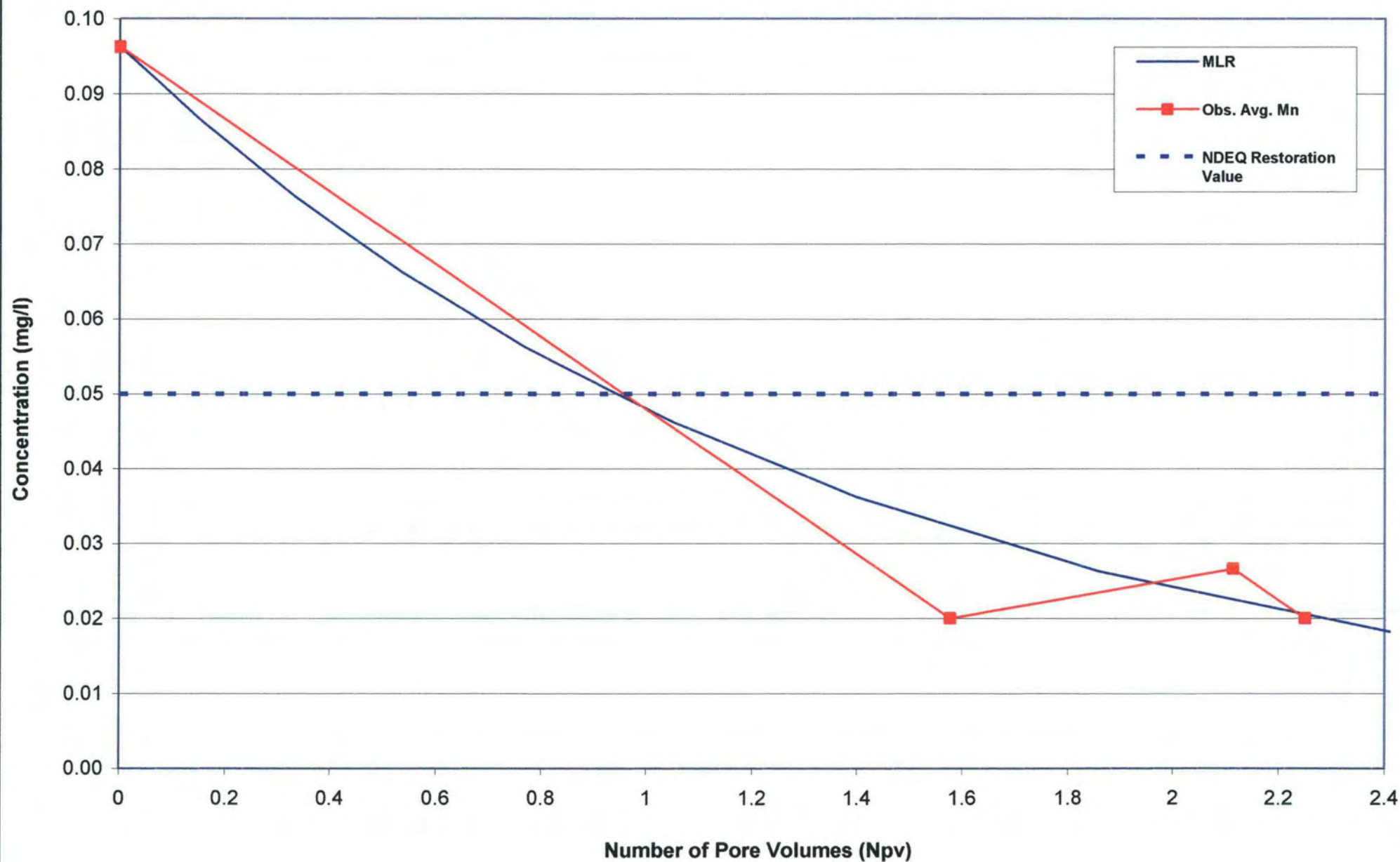
Hydrogeology, Water Resources &amp; Data Services

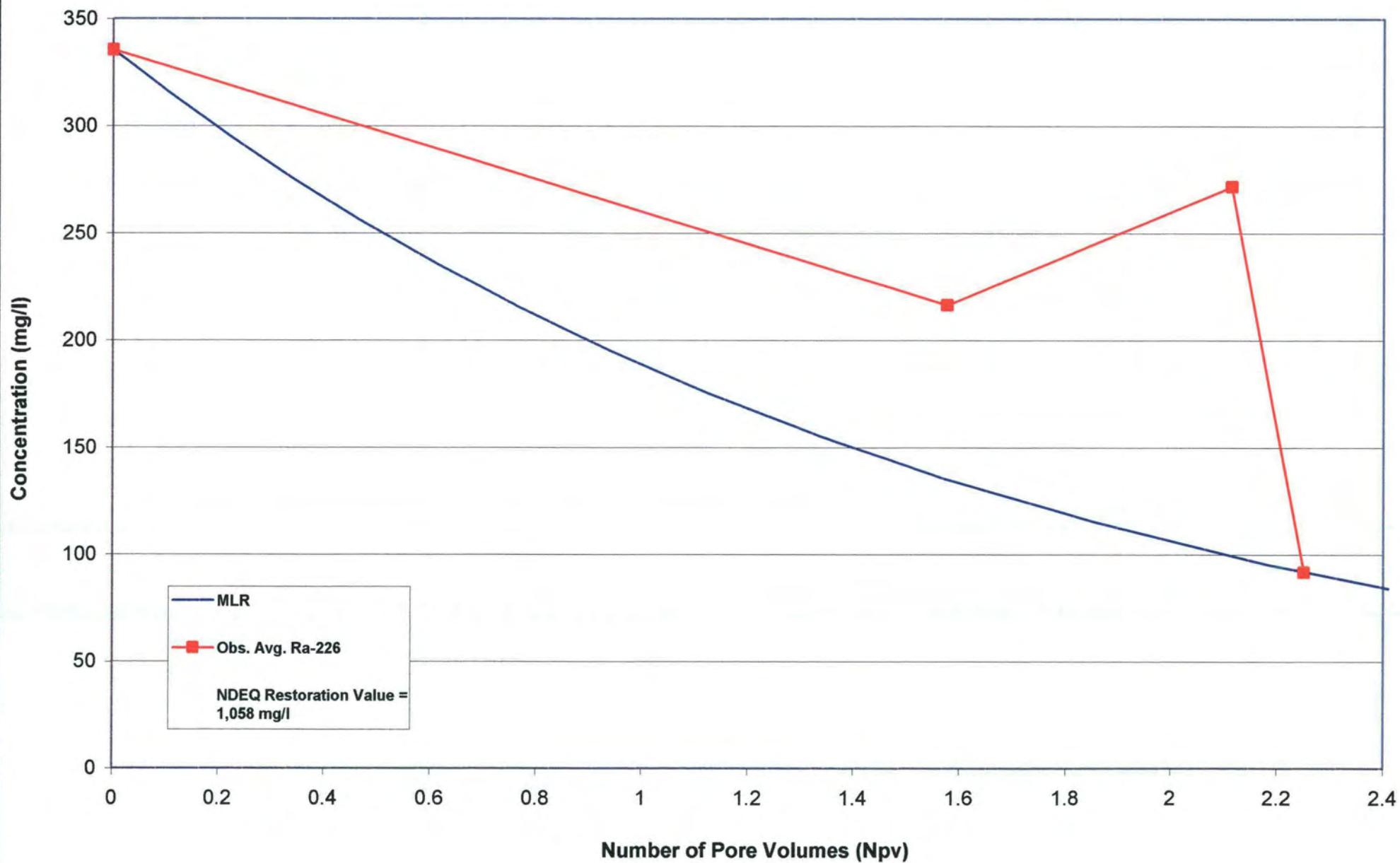
### MU-3 Observed vs. Simulated Chloride Pore-Volume Restoration Curve

Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska

FIGURE

**4-2**



**AQUI-VER, INC.**

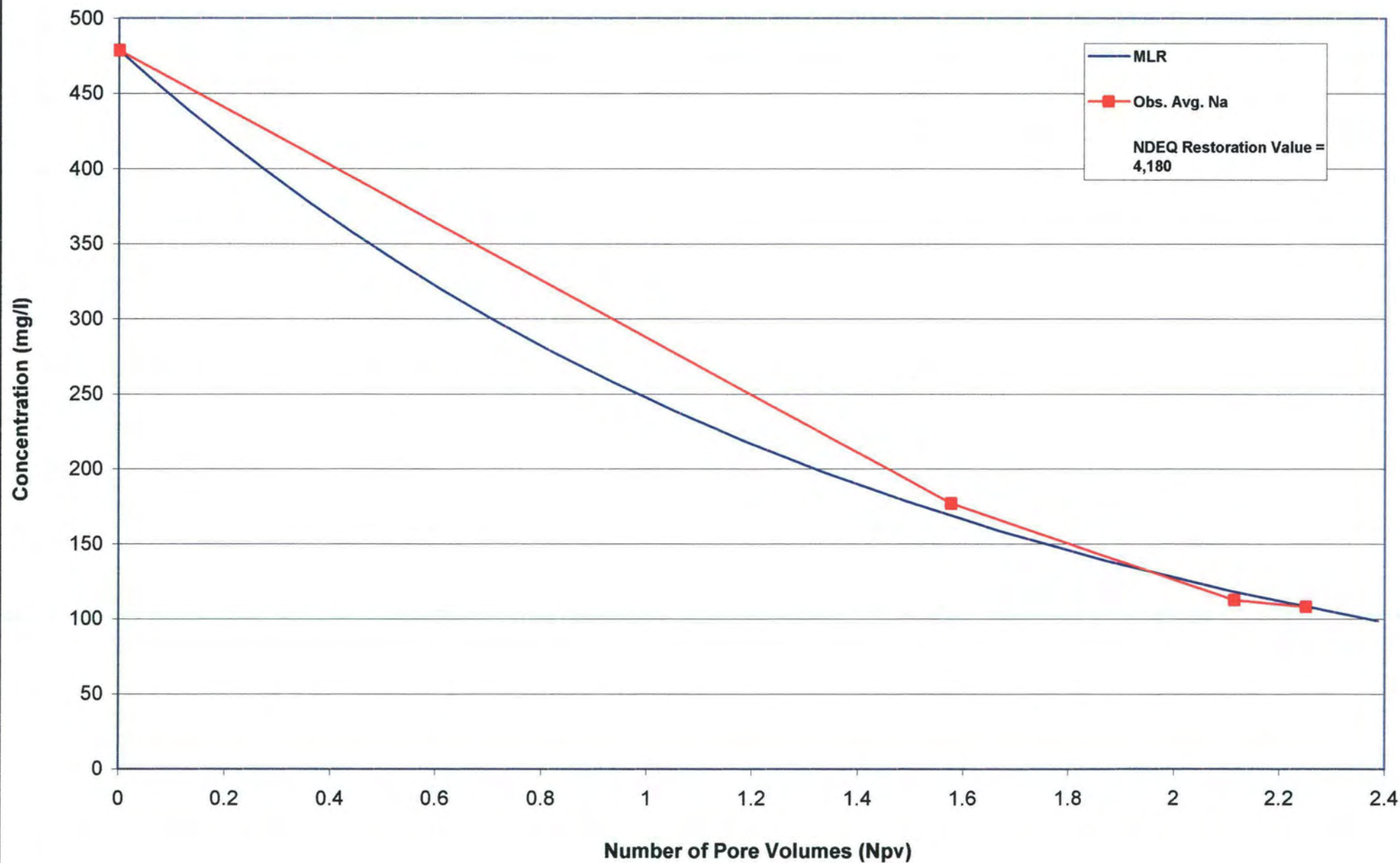
Hydrogeology, Water Resources &amp; Data Services

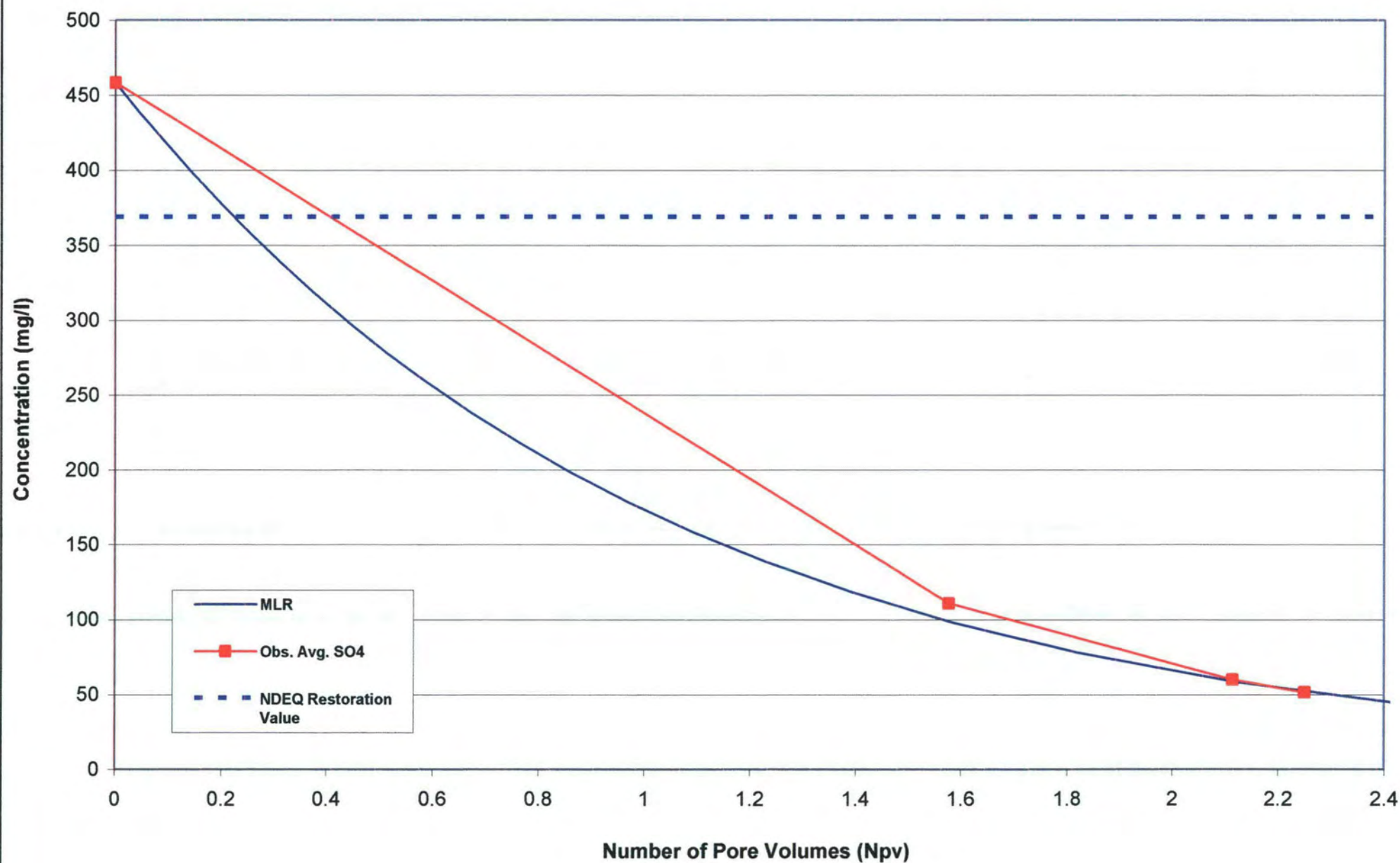
### MU-2 Observed vs. Simulated Ra-226 Pore Volume Restoration Curve

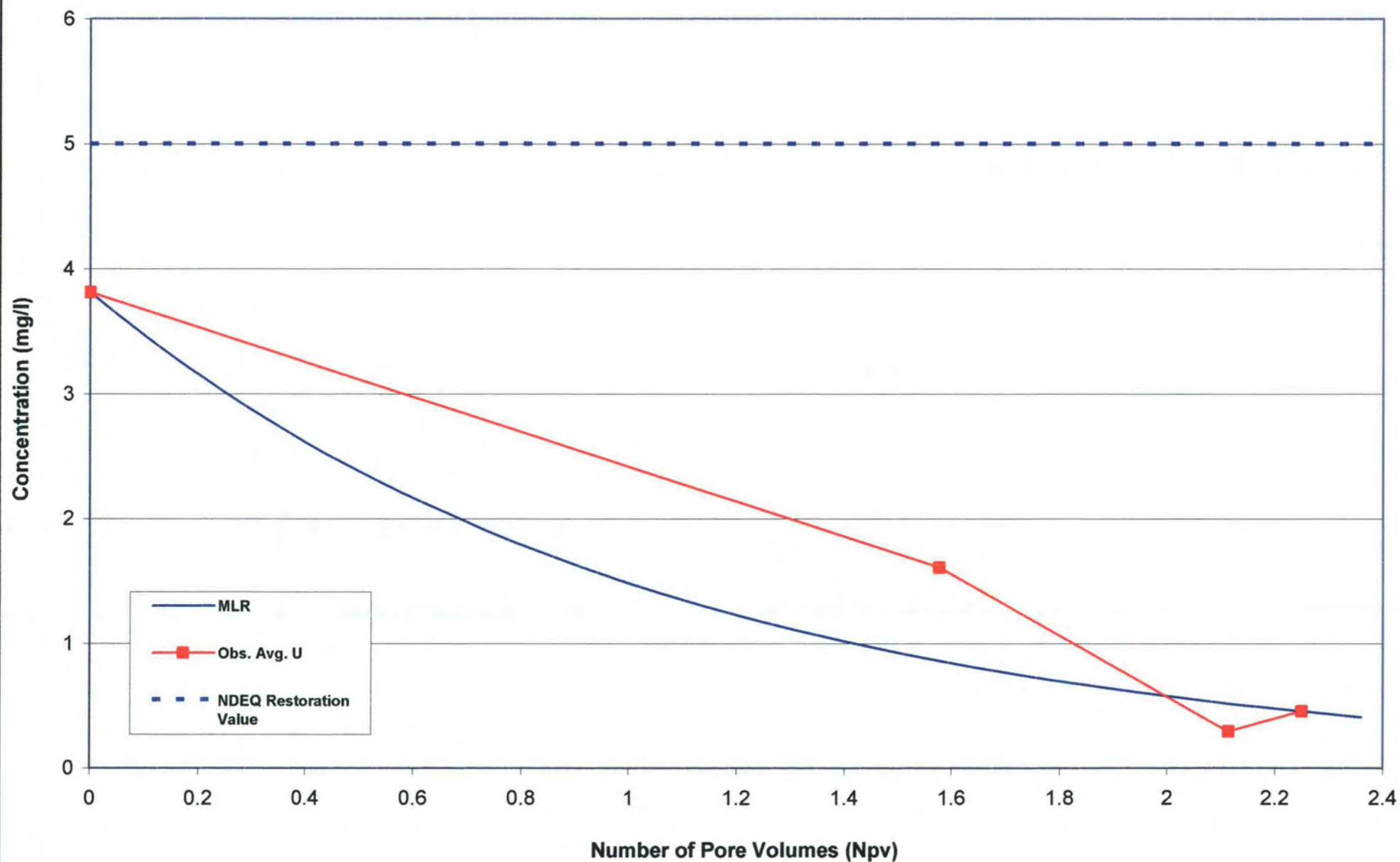
Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska  
Cameco 435

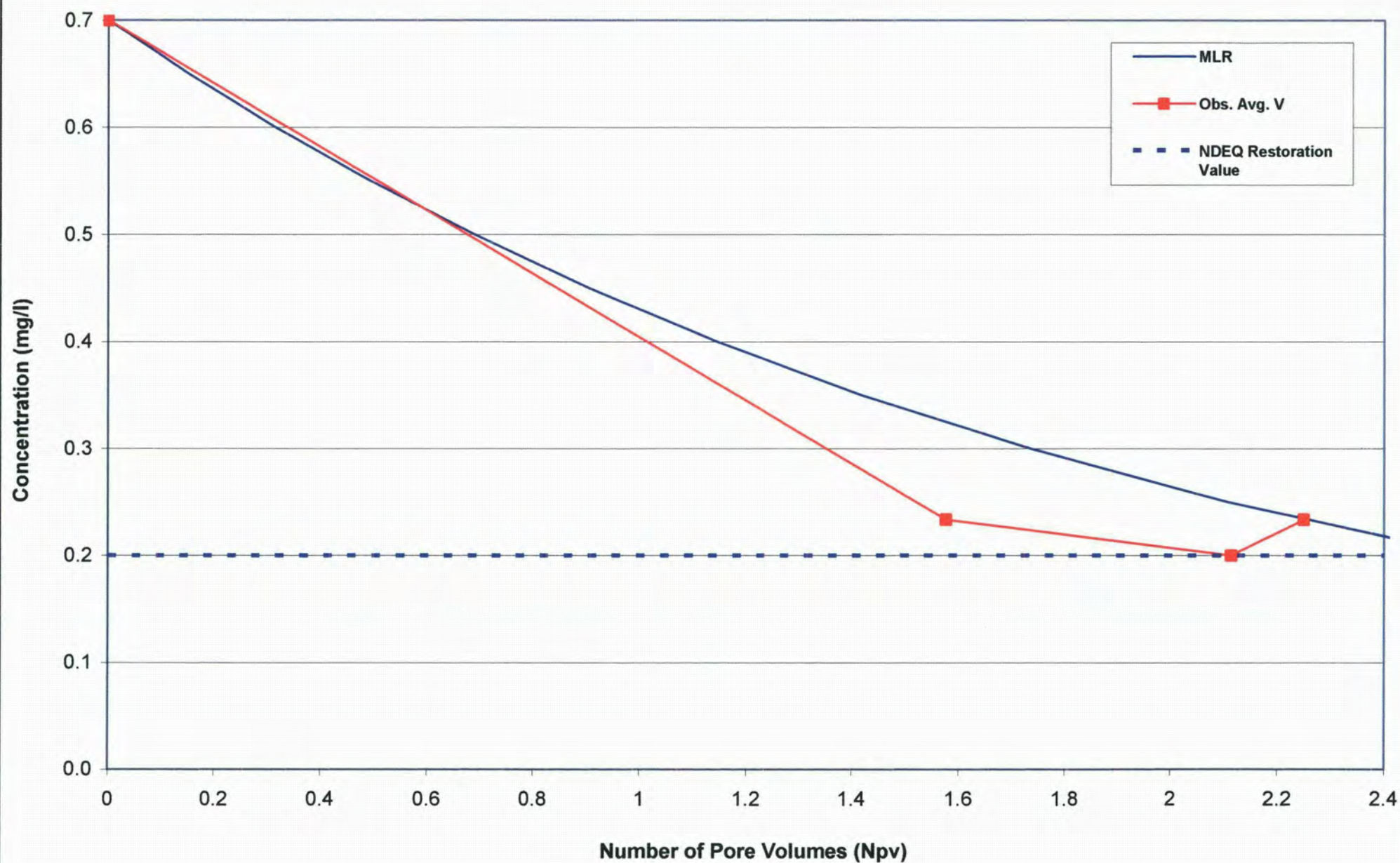
FIGURE

**4-4**







**AQUI-VER, INC.**

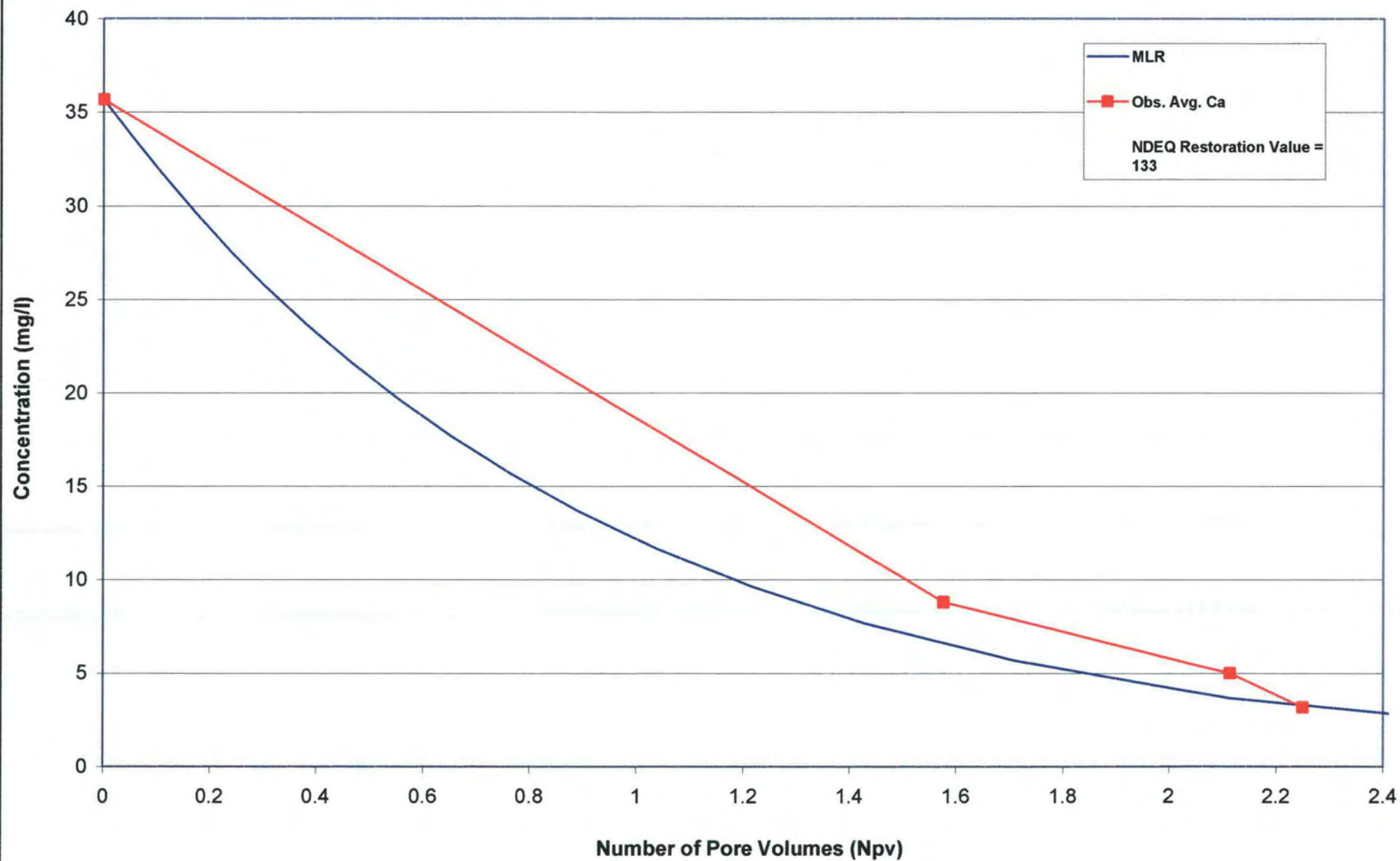
Hydrogeology, Water Resources &amp; Data Services

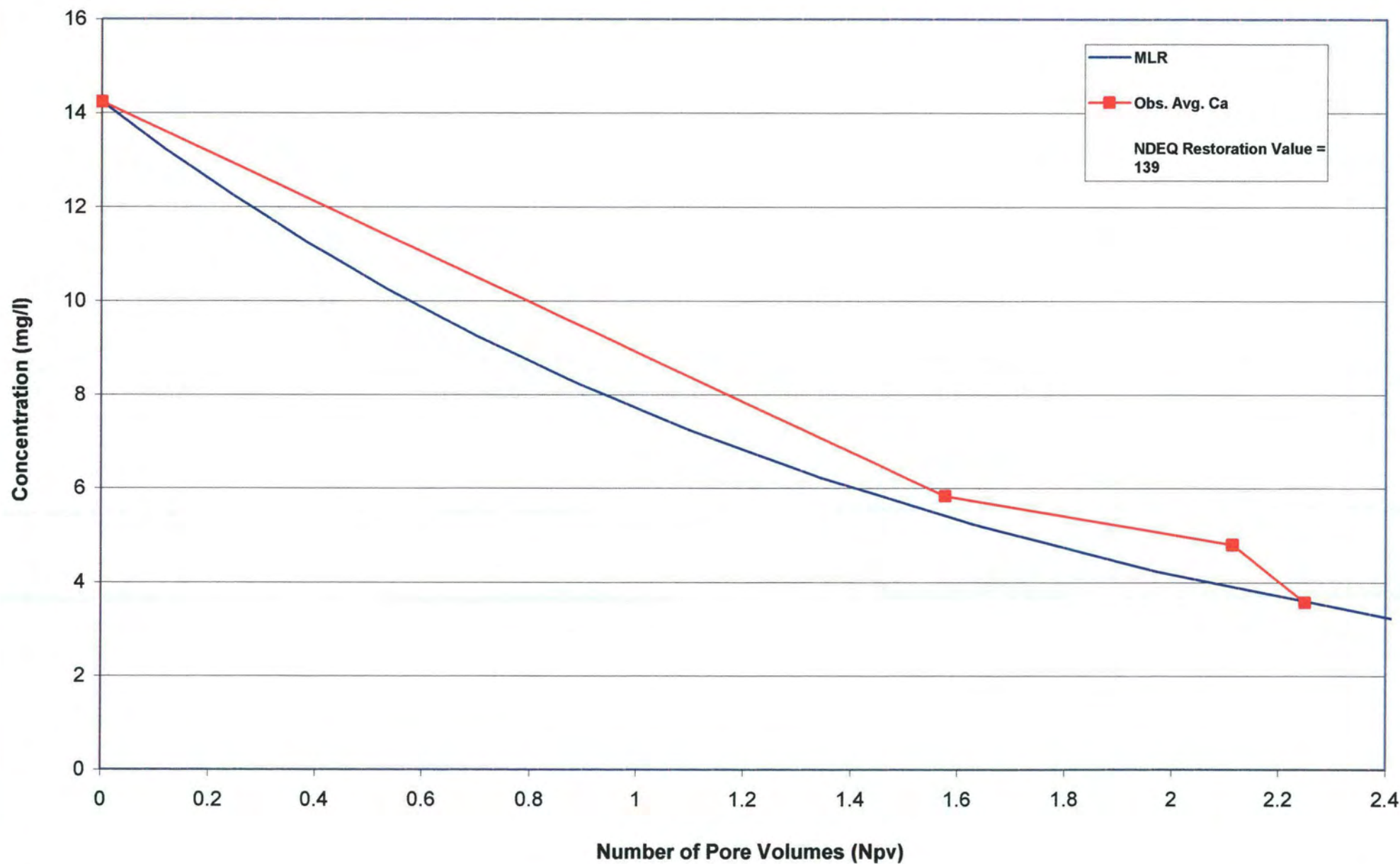
### MU-2 Observed vs. Simulated V Pore Volume Restoration Curve

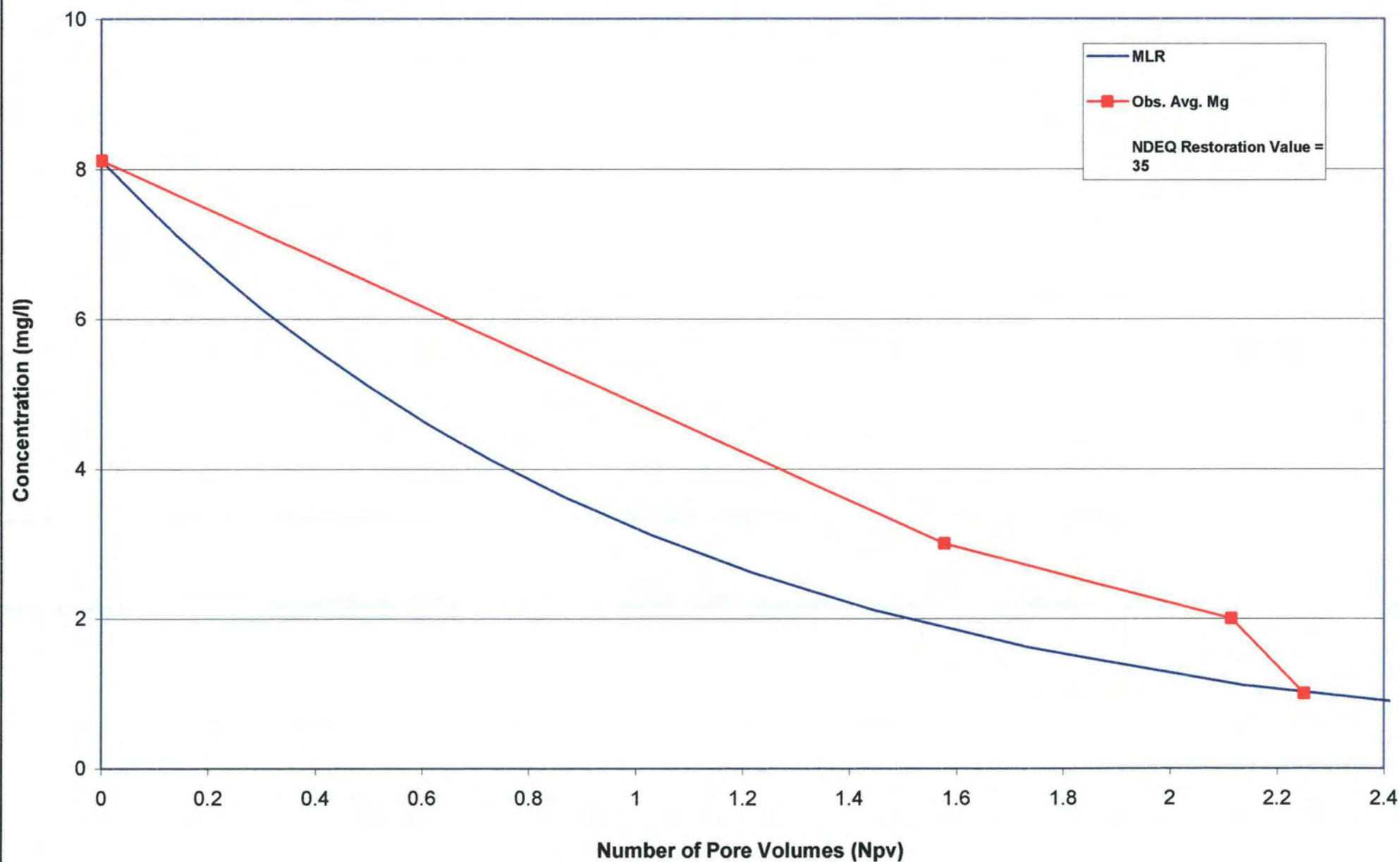
Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska  
Cameco 0439

FIGURE

**4-8**





**AQUI-VER, INC.**

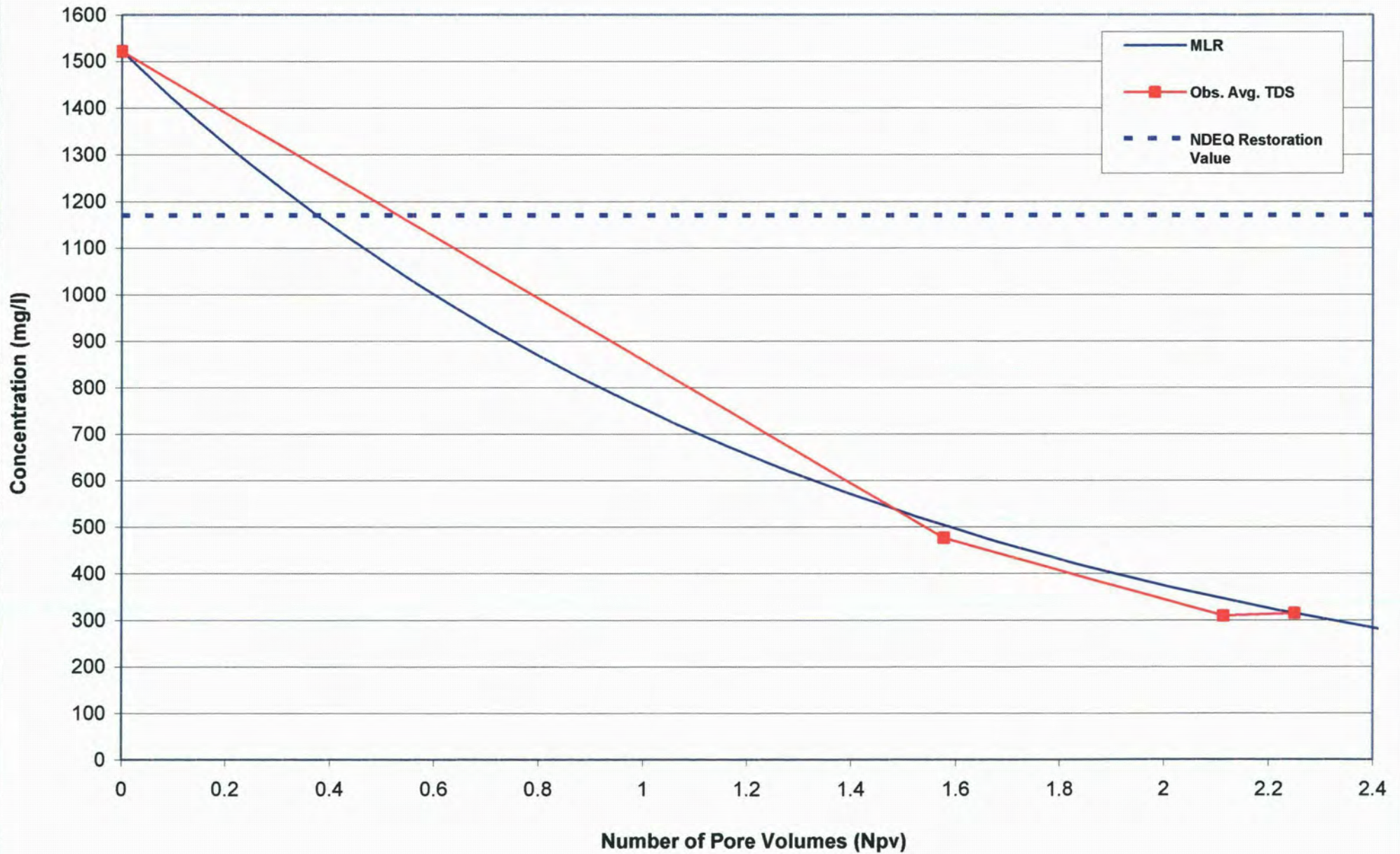
Hydrogeology, Water Resources &amp; Data Services

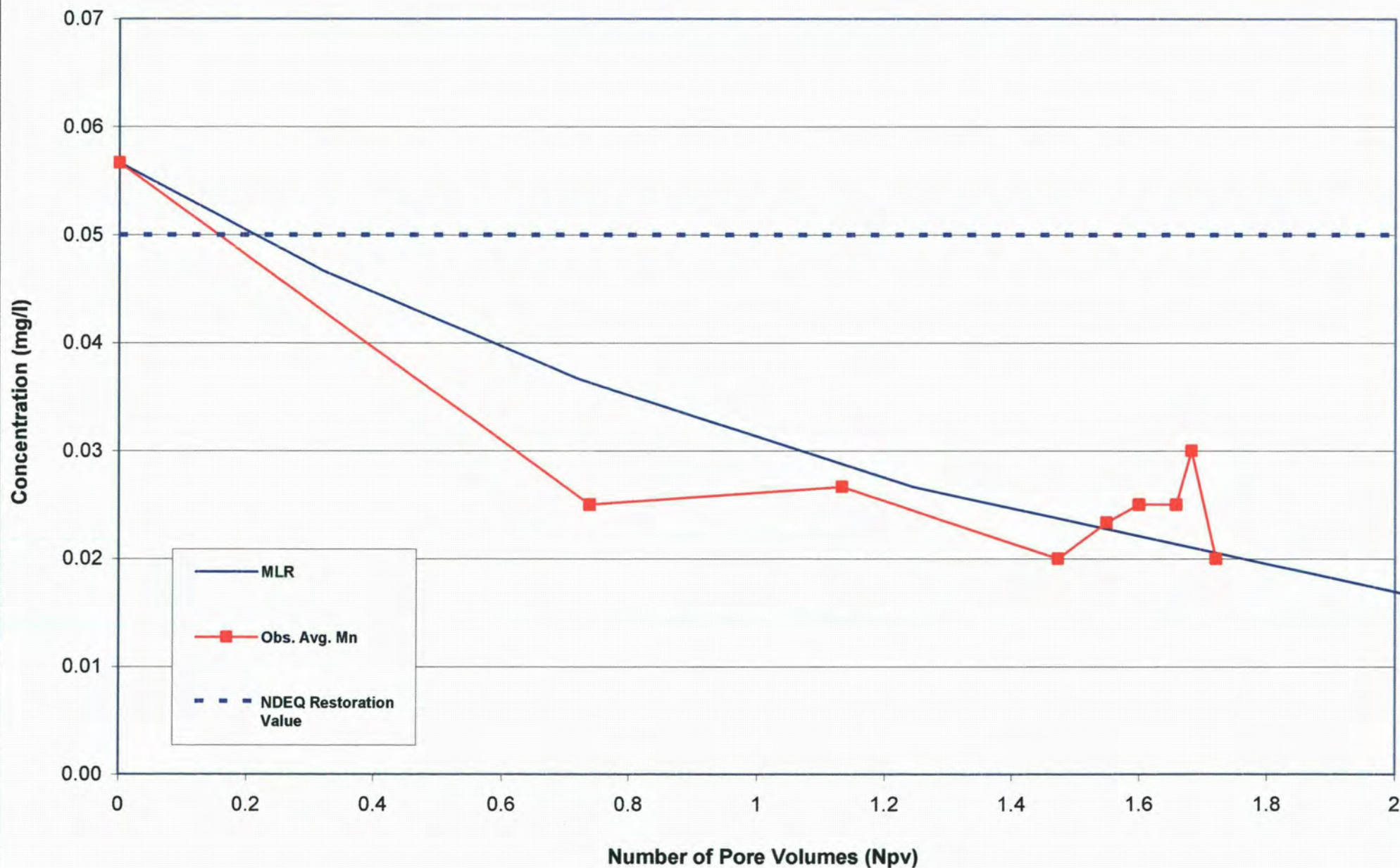
### MU-2 Observed vs. Simulated Mg Pore Volume Restoration Curve

Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska  
Cameco<sup>442</sup>

FIGURE

**4-11**



**AQUI-VER, INC.**

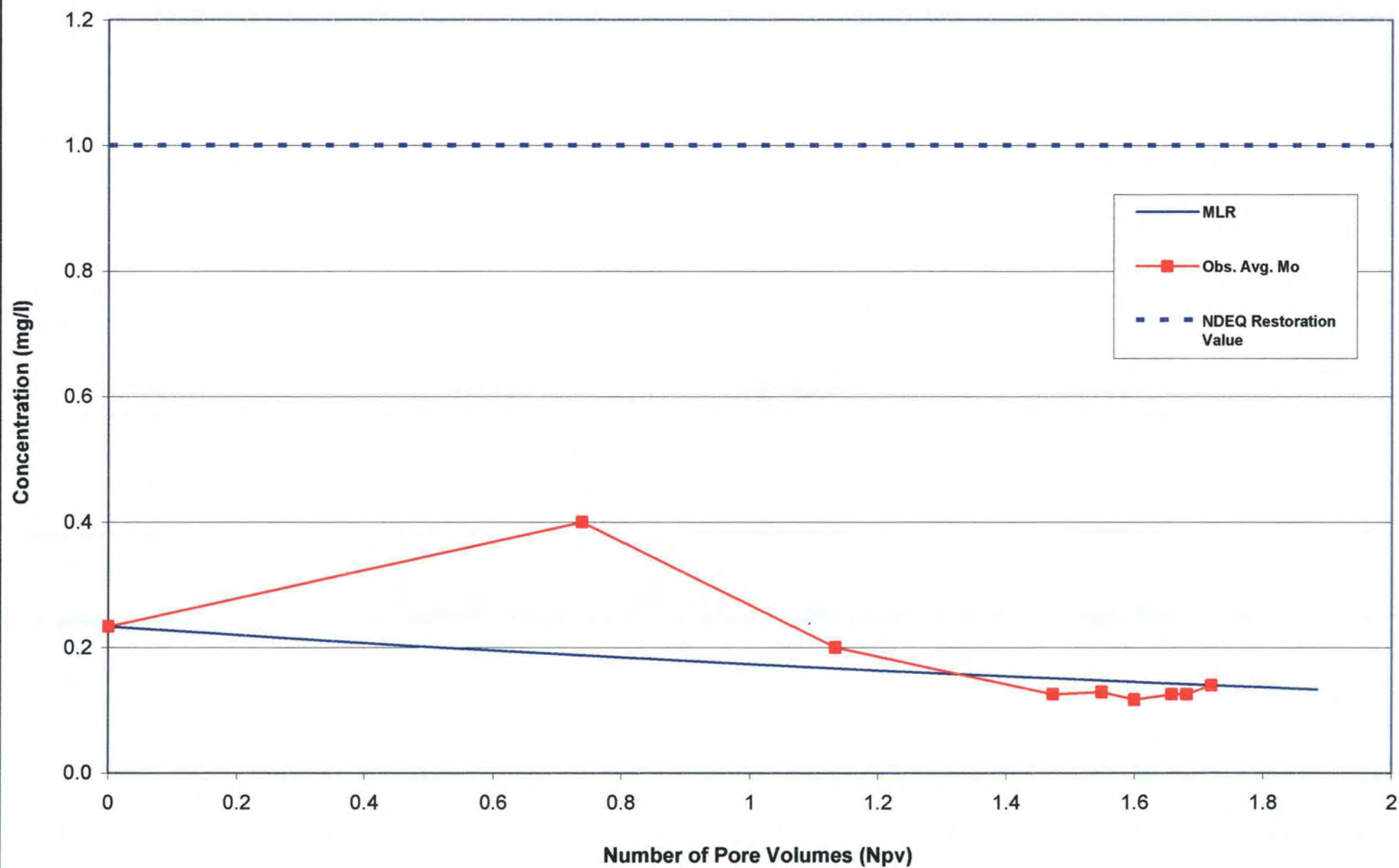
Hydrogeology, Water Resources &amp; Data Services

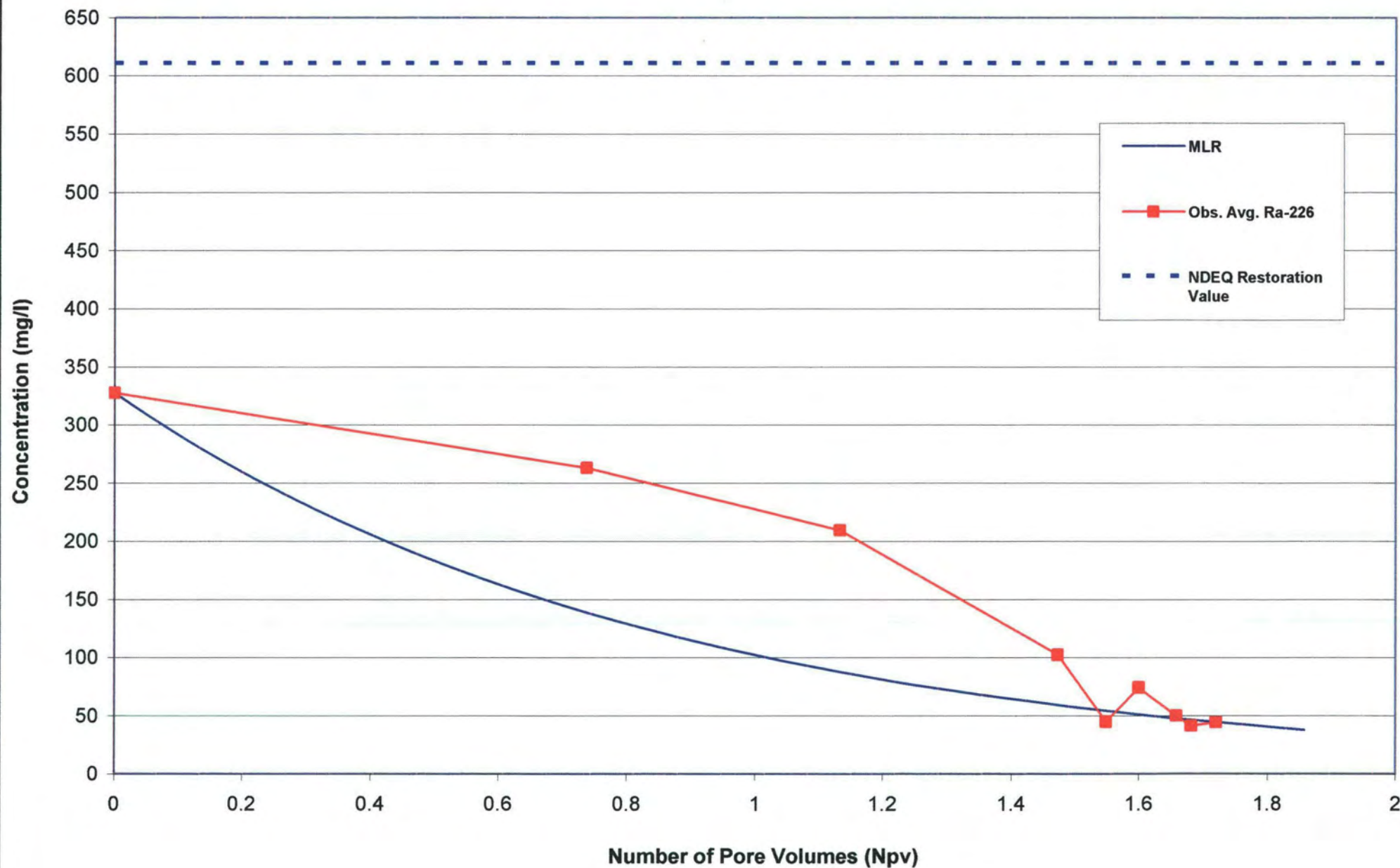
### MU-3 Observed vs. Simulated Mn Pore Volume Restoration Curve

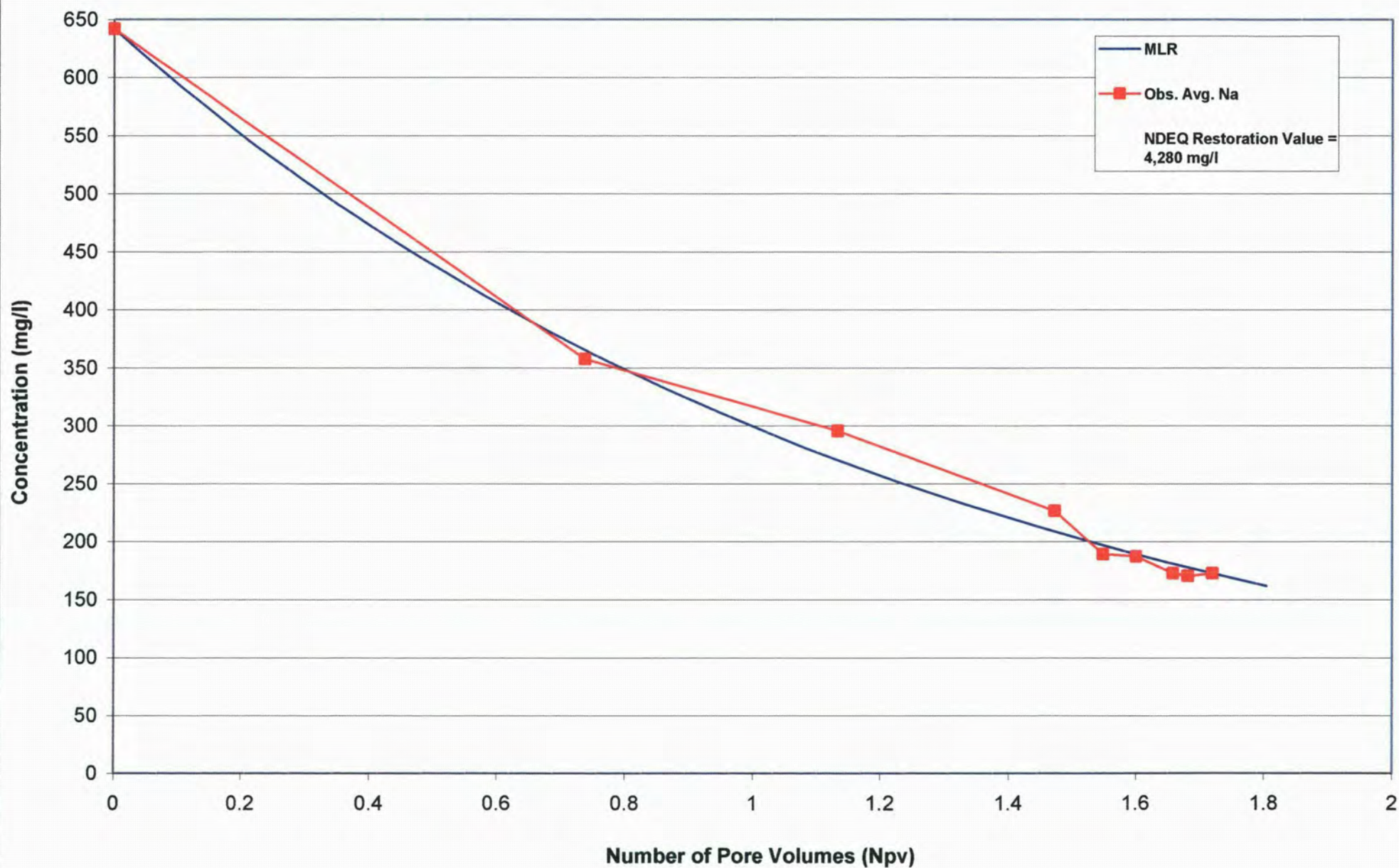
Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska

FIGURE

**4-13**





**AQUI-VER, INC.**

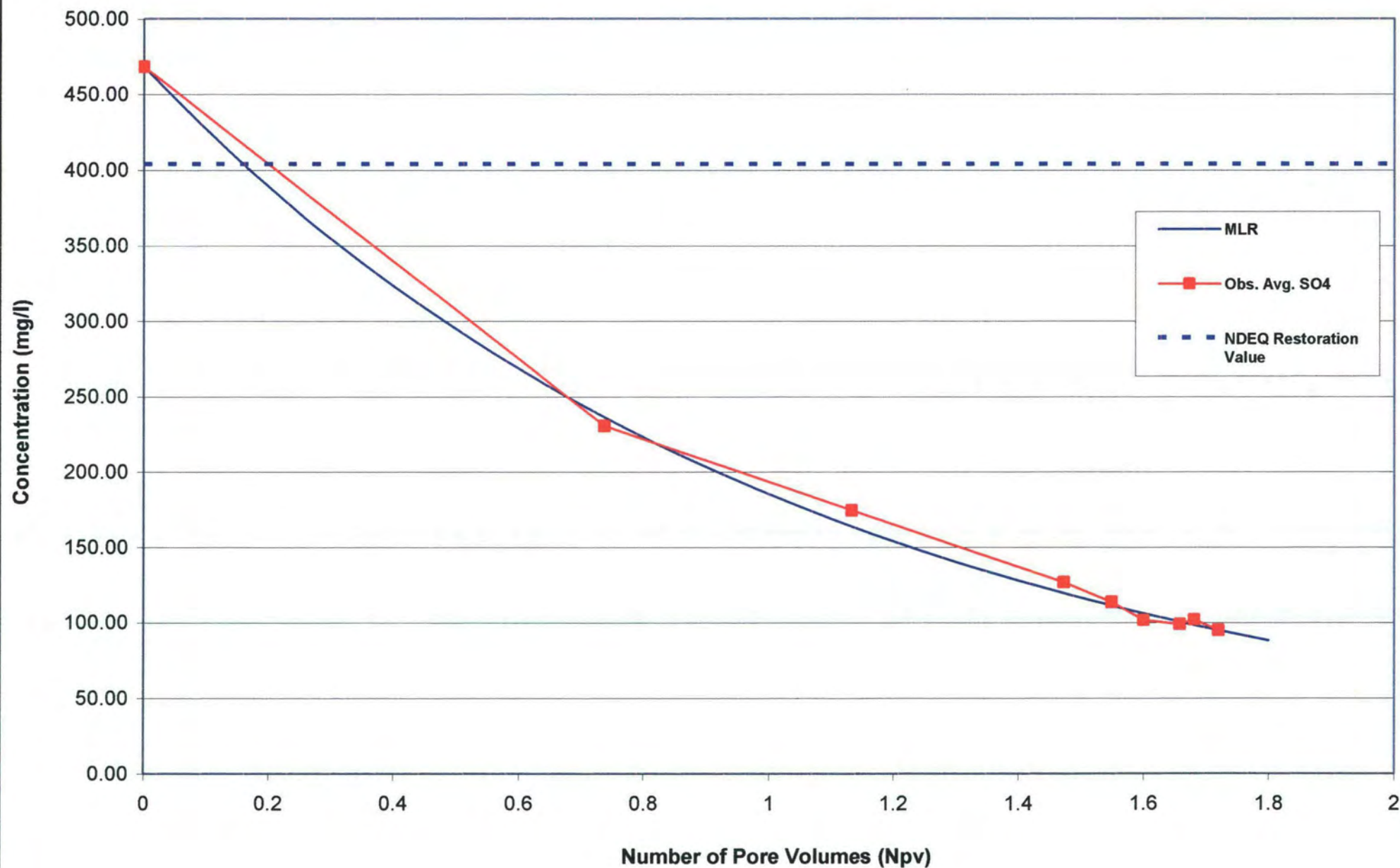
Hydrogeology, Water Resources &amp; Data Services

### MU-3 Observed vs. Simulated Na Pore Volume Restoration Curve

Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska

FIGURE

**4-16**

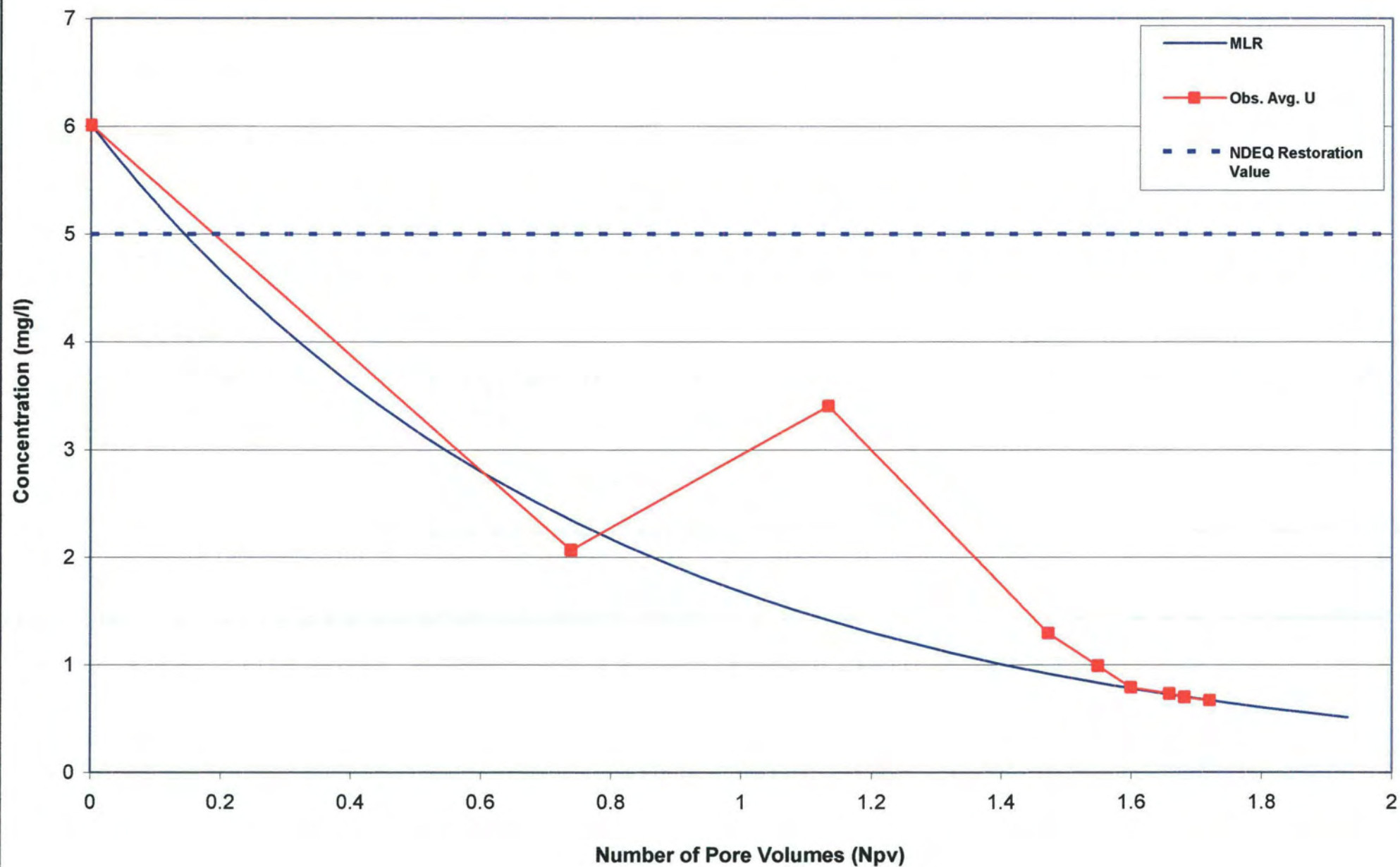
**AQUI-VER, INC.**

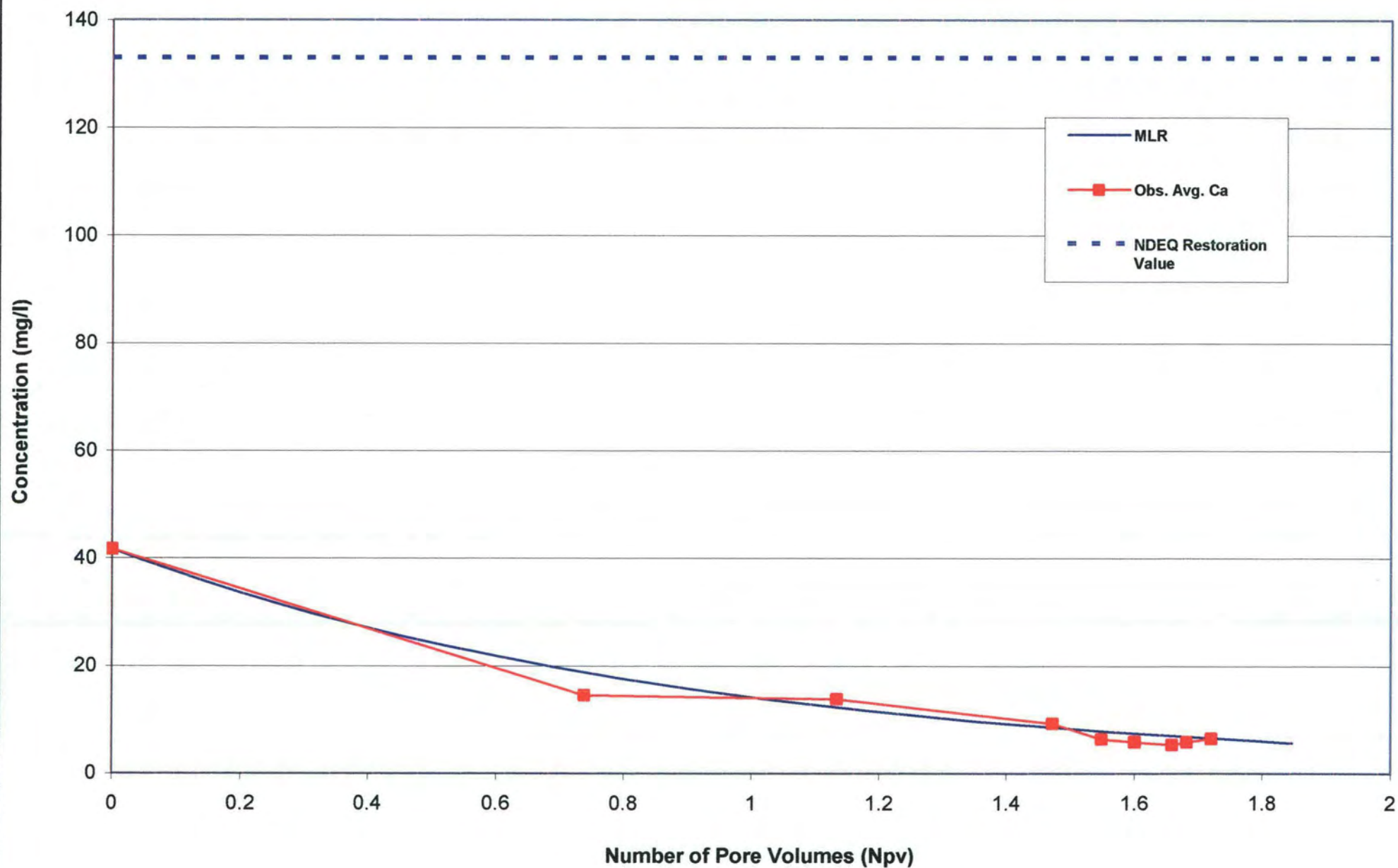
Hydrogeology, Water Resources &amp; Data Services

**MU-3 Observed vs. Simulated  
SO<sub>4</sub> Pore Volume Restoration  
Curve**Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska  
Cameco<sup>448</sup>

FIGURE

**4-17**



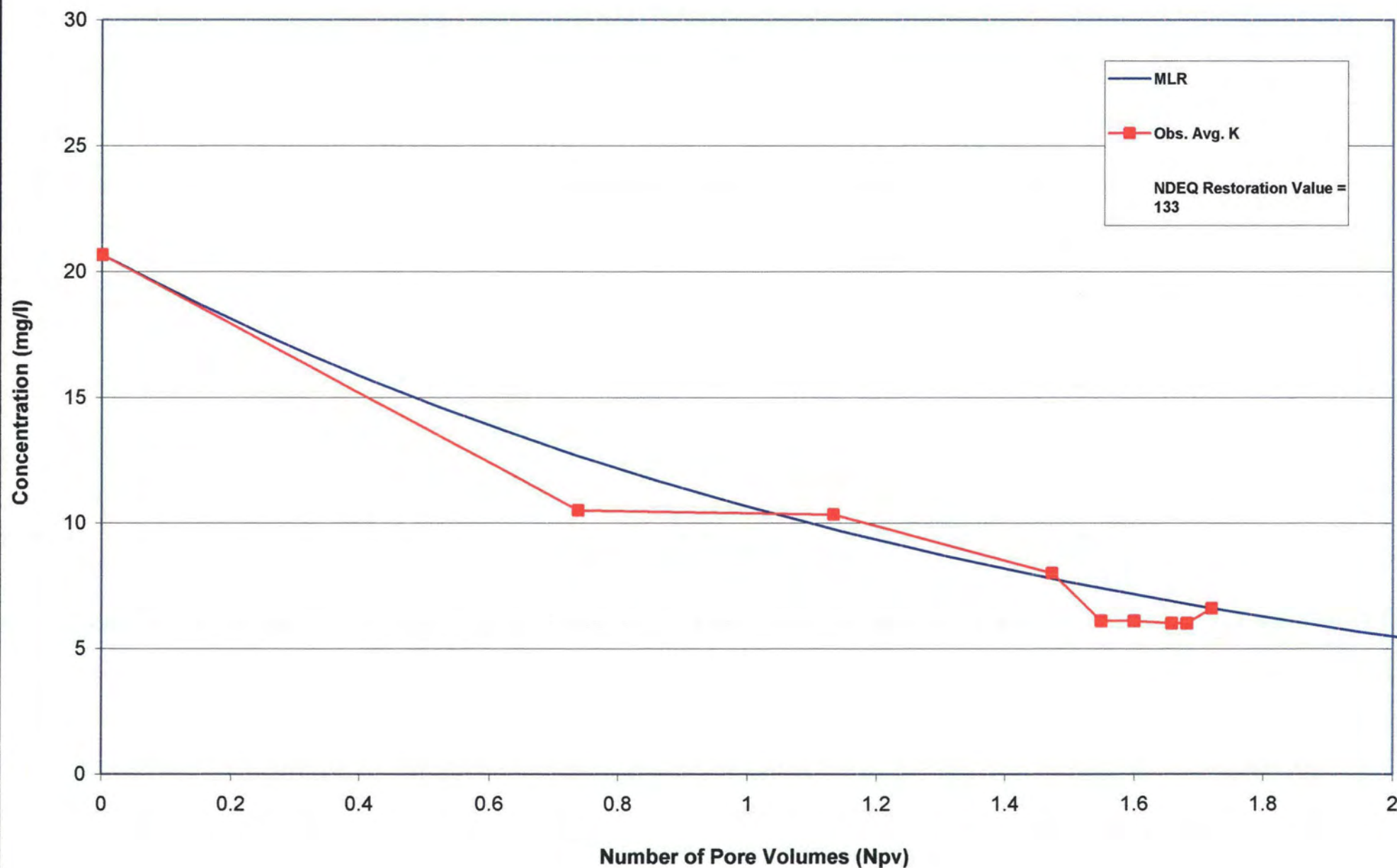
**AQUI-VER, INC.**

Hydrogeology, Water Resources &amp; Data Services

**MU-3 Observed vs. Simulated  
Ca Restoration Curve**Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska

FIGURE

**4-19**

**AQUI-VER, INC.**

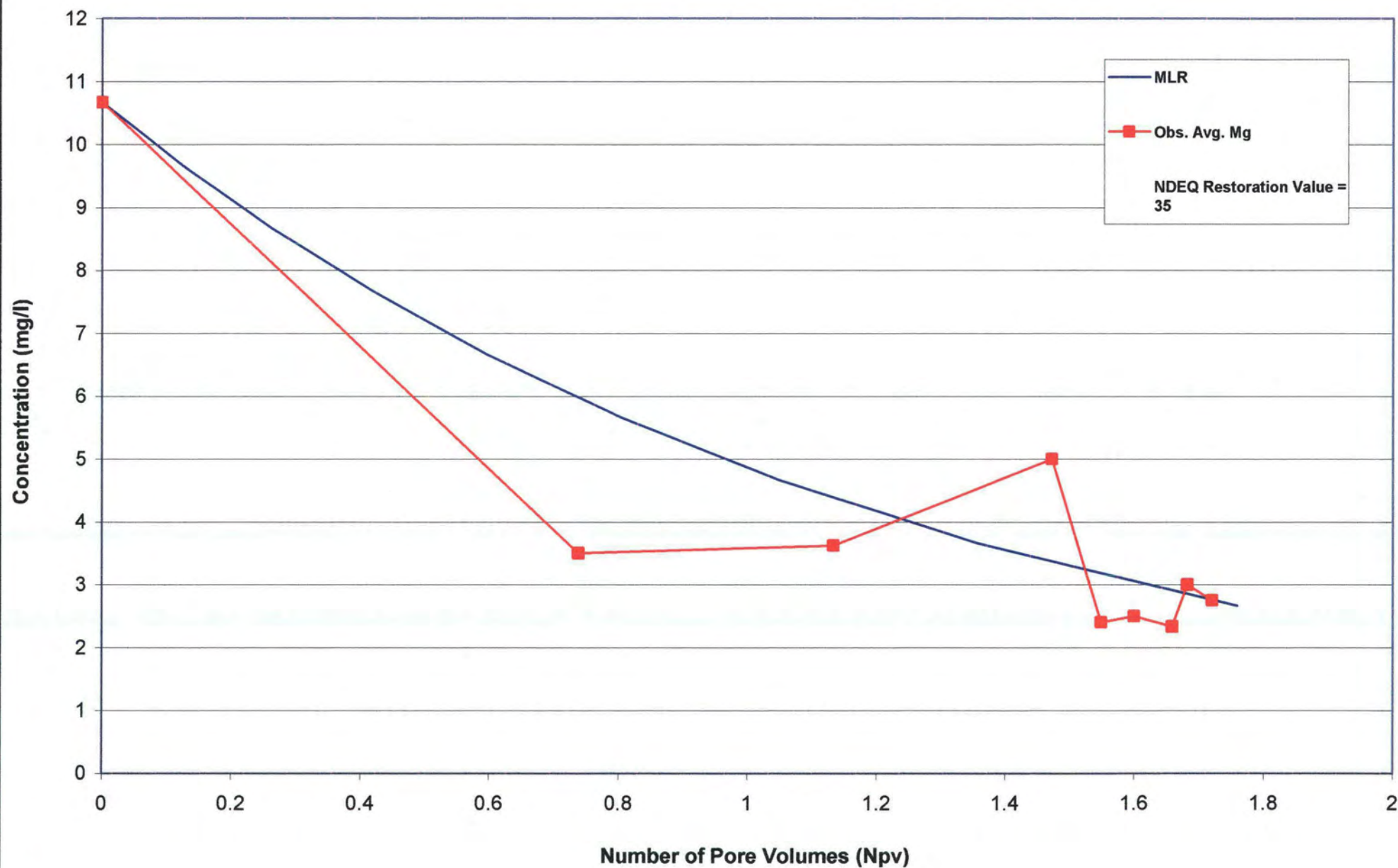
Hydrogeology, Water Resources &amp; Data Services

### MU-3 Observed vs. Simulated K Pore Volume Restoration Curve

Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska

FIGURE

**4-20**

**AQUI-VER, INC.**

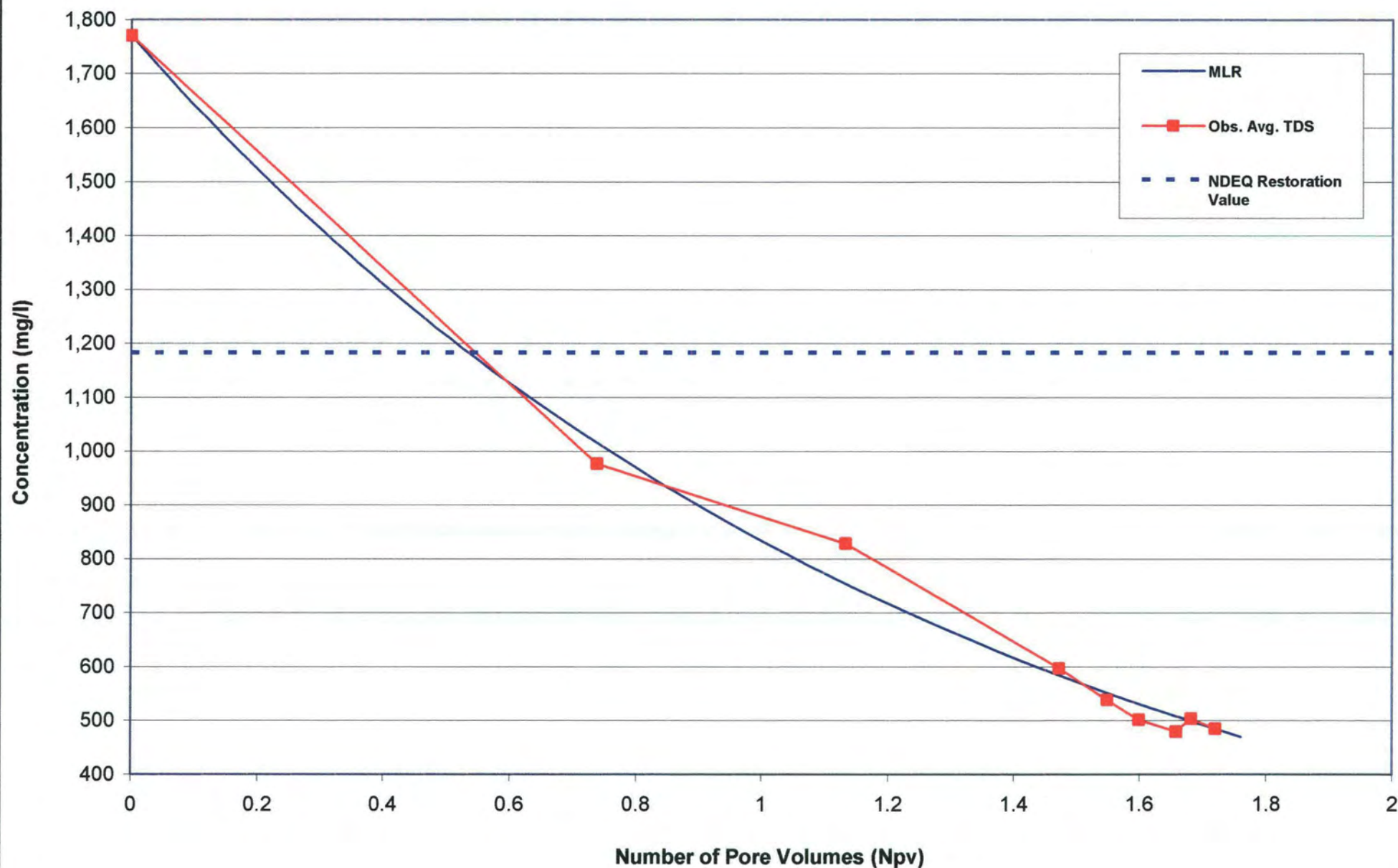
Hydrogeology, Water Resources &amp; Data Services

### MU-3 Observed vs. Simulated Mg Pore Volume Restoration Curve

Cameco Resources  
Crow Butte Facility  
Dawes County, Nebraska

FIGURE

**4-21**



## 5. PORE VOLUME RESTORATION REQUIREMENTS FOR OTHER MINE UNITS

Results of the pore volume restoration analysis described in **Section 4** can be expanded to evaluate the pore volume restoration requirements for other mine units at the site. The pore volume restoration requirements for future mine units can be evaluated by using the MLR model to calculate the additional number of pore volumes needed to lower the chloride concentration from a post-mining condition to a fully restored condition. Groundwater quality data collected from MU-2 and MU-3 in 1996 and 1999 indicate average post-mining concentrations of chloride were approximately 633 and 681 mg/l, respectively (**Attachment A**). Given an initial average chloride concentration ( $C_i$ ) of 633 mg/L for MU-2, the additional number of pore volumes needed to restore the production aquifer from a post-mining condition to a fully restored condition is 0.89. Given an initial chloride concentration ( $C_i$ ) of 681 mg/L for MU-3, the additional number of pore volumes needed to restore the production aquifer from a post-mining condition to a fully restored condition is 0.80. By summing together these additional pore volume requirements and the full-scale pore volume restoration requirements for MU-2 and MU-3 (2.11 and 0.74 pore volumes, respectively), we can conclude the theoretical number of pore volumes required to restore a mine unit from the post-mining condition to a fully restored condition at the site is 1.54 (MU-3 analogy) to 3.00 (MU-2 analogy).

It was noted in **Section 4.2** that the theoretical affected pore volume (APV) computed from the MLR model differs somewhat from the historical APV calculated by Cameco. The theoretical APV calculated by the MLR model for MU-2 and MU-3 is larger than the historical APV calculated by Cameco by a factor of approximately 1.21 (MU-2) to 3.87 (MU-3). The difference between the theoretical and calculated APV represents a combination of uncertainties inherent in Cameco's APV calculations (e.g. estimated flare factor, porosity, pattern area, sand thickness), restoration inefficiencies (although much less than historical inefficiencies), deviation from the theoretical model assumption of complete mixing, and uncertainty in the computed average water quality. If Cameco's calculated APV for MU-2 and MU-3 is used instead of the theoretical APV computed by the MLR model, the total number of pore volumes required to restore groundwater from a post-mining condition to a fully restored condition is approximately 3.63 (more efficient) to 5.96 (less efficient).

## 6. SUMMARY AND CONCLUSIONS

Results of the pore volume analysis in MU-2 and MU-3 demonstrate that restoration of these mine units was accomplished (with the exception of local elevated arsenic concentrations in MU-3) in approximately 6 to 9 months following the implementation of the MBRP. Restoration was achieved after 2.11 pore volumes of groundwater treatment in MU-2, and 0.74 pore volumes of groundwater treatment in MU-3. The total number of pore volumes treated in MU-2 and MU-3 as part of the MBRP was 2.25 and 1.72, respectively.

Results of the pore volume restoration analysis in MU-2 and MU-3 were expanded to evaluate the number of pore volumes required for future restoration of other mine units at the site. Results of this analysis indicate the theoretical number of pore volumes required to restore a mine unit from the post-mining condition to a fully restored condition at the site is 1.54 (MU-3 analogy) to 3.00 (MU-2 analogy).

The theoretical APV calculated from the MLR model is larger than Cameco's calculated APV by a factor of approximately 1.21 (MU-2) to 3.87 (MU-3). The difference between the theoretical and calculated APV represents a combination of uncertainties inherent in Cameco's APV calculations (e.g. estimated flare factor, porosity, pattern area, sand thickness, restoration inefficiencies, deviation from the theoretical model assumption of complete mixing, and uncertainty in the computed average water quality. If Cameco's calculated APV for MU-2 and MU-3 is used instead of the theoretical APV computed by the MLR model, the total number of pore volumes required to restore groundwater from a post-mining condition to a fully restored condition is approximately 3.63 (more efficient) to 5.96 (less efficient).

The results of this study can be used to compare the relative effectiveness of restoration before and after the implementation of the MBRP. Prior to May 2009 and the implementation of the MBRP in MU-2, the total volume of groundwater treated as part of MU-2 restoration was approximately 767 million gallons, or approximately 35 pore volumes using Cameco's calculated APV. Likewise, prior to December 2009 and the implementation of the MBRP in MU-3, the total volume of groundwater treated as part of MU-3 restoration was 1.123 billion gallons, or approximately 59 pore volumes using Cameco's calculated APV. Despite the relatively large number of pore volumes treated prior to implementation of the MBRP, MU-2 and MU-3 were only 30 to 50 percent restored, respectively, at the time the MBRP was implemented in May 2009. By comparison, results of this study indicate complete restoration of the production aquifer can be achieved in approximately 3.6 to 6.0 pore volumes using the MBRP and Cameco's calculated APV.

## **7. REFERENCES**

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Lewis Water Consultants, 1999. Evaluation and Simulation of Wellfield Restoration at the RAMC Smith Ranch Facility. Dated October 29.

WorleyParsons, 2009. Wellfield Restoration Modeling, Crow Butte Resources Mine Units 2-5, Cameco Resources, Crow Butte Operations, Crawford, Nebraska. Dated February 19.

Zheng, C., Bennett, G.D., and Andrews, C.B., 1991. Analysis of Ground-Water Remedial Alternatives at a Superfund Site, *Groundwater*, vol. 29, no. 6, pp. 838-848.

Zheng, C., Bennett, G.D., and Andrews, C.B., 1992. Reply to Discussion of "Analysis of Ground-Water Remedial Alternatives at a Superfund Site", *Groundwater*, vol. 30, no. 3, pp. 440-442.

# **ATTACHMENT A**

## **Post-Mining Water Quality Analyses**

**ENERGY LABORATORIES, INC.**

INT-021C

P.O. BOX 3258 • CASPER, WY 82602 • PHONE (307) 235-0515  
254 NORTH CENTER, SUITE 100 • CASPER, WY 82601 • FAX (307) 234-1639**WATER ANALYSIS REPORT – Crow Butte Resources**

Report Date: 03-05-96

Sample I.D.:

Sample Date:

Sample Number:

BL-1 (I-171)

02-15-96

96-13442

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	111	1.0
Magnesium (Mg)	mg/l	30.9	1.0
Sodium (Na)	mg/l	1159	1.0
Potassium (K)	mg/l	41.4	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1341	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1155	1.0
Chloride (Cl)	mg/l	643	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	0.08	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.96	0.10
Fluoride (F)	mg/l	0.39	0.10
Silica (SiO <sub>2</sub> )	mg/l	24.5	1.0

**Non – Metals**

Total Dissolved Solids (TDS) @ 180°C	mg/l	4043	1.0
Conductivity	µmho/cm	5993	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	1099	1.0
pH	std. units	7.67	0.10

**Trace Metals**

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.032	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.03	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.01	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.36	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.45	0.10
Nickel (Ni)	mg/l	0.12	0.05
Selenium (Se)	mg/l	0.112	0.001
Vanadium (V)	mg/l	0.72	0.10
Zinc (Zn)	mg/l	0.12	0.01

**Radiometric**

Uranium (U <sup>nat</sup> )	mg/l	4.519	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	1347	0.2
Radium Precision ±		12.1	

**Quality Assurance Data****Acceptance Range**

Anion	meq	64.25	
Cation	meq	59.62	
WYDEQ A/C Balance	%	-3.74	-5 – +5
Calc TDS	mg/l	3841	
TDS A/C Balance	dec. %	1.05	0.90 – 1.10

Report Approved by: *R.A. Leasing*

PIM 13442cbr.wk3



# ENERGY LABORATORIES, INC.

INT-021C

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## WATER ANALYSIS REPORT – Crow Butte Resources

Report Date: 03-05-96

Sample I.D.:

BL-2 (P-94)

Sample Date:

02-15-96

Sample Number:

96-13446

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	142	1.0
Magnesium (Mg)	mg/l	37.1	1.0
Sodium (Na)	mg/l	1197	1.0
Potassium (K)	mg/l	43.8	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1338	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1325	1.0
Chloride (Cl)	mg/l	685	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	< 0.05	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.62	0.10
Fluoride (F)	mg/l	0.37	0.10
Silica (SiO <sub>2</sub> )	mg/l	28.1	1.0

### Non – Metals

Total Dissolved Solids (TDS) @ 180°C	mg/l	4310	1.0
Conductivity	µmho/cm	6220	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	1097	1.0
pH	std. units	7.51	0.10

### Trace Metals

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.018	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.15	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.01	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.22	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.41	0.10
Nickel (Ni)	mg/l	0.73	0.05
Selenium (Se)	mg/l	0.125	0.001
Vanadium (V)	mg/l	0.50	0.10
Zinc (Zn)	mg/l	0.13	0.01

### Radiometric

Uranium (U <sup>nat</sup> )	mg/l	9.847	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	510	0.2
Radium Precision ±		7.2	

### Quality Assurance Data

### Acceptance Range

Anion	meq	68.91	
Cation	meq	63.39	
WYDEQ A/C Balance	%	-4.17	-5 – +5
Calc TDS	mg/l	4131	
TDS A/C Balance	dec. %	1.04	0.90 – 1.10



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## WATER ANALYSIS REPORT – Crow Butte Resources

Report Date: 03-05-96

Sample I.D.:

PM-2 (I-188)

Sample Date:

02-15-96

Sample Number:

96-13444

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	119	1.0
Magnesium (Mg)	mg/l	34.0	1.0
Sodium (Na)	mg/l	1183	1.0
Potassium (K)	mg/l	45.1	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1248	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1240	1.0
Chloride (Cl)	mg/l	609	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	0.19	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.79	0.10
Fluoride (F)	mg/l	0.32	0.10
Silica (SiO <sub>2</sub> )	mg/l	26.8	1.0

### Non – Metals

Total Dissolved Solids (TDS) @ 180°C	mg/l	4160	1.0
Conductivity	µmho/cm	6027	1.0
Alkalinity, measured as CaCO <sub>3</sub>	mg/l	1023	1.0
pH	std. units	7.49	0.10

### Trace Metals

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.025	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.15	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.01	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.21	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.40	0.10
Nickel (Ni)	mg/l	< 0.05	0.05
Selenium (Se)	mg/l	0.178	0.001
Vanadium (V)	mg/l	0.34	0.10
Zinc (Zn)	mg/l	0.06	0.01

### Radiometric

Uranium (U <sup>nat</sup> )	mg/l	21.52	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	882	0.2
Radium Precision ±		9.6	

### Quality Assurance Data

### Acceptance Range

Anion	meq	63.53	
Cation	meq	61.42	
WYDEQ A/C Balance	%	-1.69	-5 – +5
Calc TDS	mg/l	3886	
TDS A/C Balance	dec. %	1.07	0.90 – 1.10

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INT-021C

P.O. BOX 3258 • CASPER, WY 82602 • PHONE (307) 235-0515  
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Report Date: 03-05-96

Sample I.D.:

PM-8 (I-196)

Sample Date:

02-16-96

Sample Number:

96-19453

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	134	1.0
Magnesium (Mg)	mg/l	37.0	1.0
Sodium (Na)	mg/l	1135	1.0
Potassium (K)	mg/l	44.1	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1124	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1431	1.0
Chloride (Cl)	mg/l	622	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	0.21	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.55	0.10
Fluoride (F)	mg/l	0.26	0.10
Silica (SiO <sub>2</sub> )	mg/l	27.2	1.0

**Non – Metals**

Total Dissolved Solids (TDS) @ 180°C	mg/l	4268	1.0
Conductivity	µmho/cm	6061	1.0
Alkalinity, measured as CaCO <sub>3</sub>	mg/l	921	1.0
pH	std. units	7.50	0.10

**Trace Metals**

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.025	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.20	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.02	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.10	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.30	0.10
Nickel (Ni)	mg/l	< 0.05	0.05
Selenium (Se)	mg/l	0.112	0.001
Vanadium (V)	mg/l	0.62	0.10
Zinc (Zn)	mg/l	0.14	0.01

**Radiometric**

Uranium (U <sup>nat</sup> )	mg/l	17.52	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	1231	0.2
Radium Precision ±		16.2	

**Quality Assurance Data****Acceptance Range**

Anion	meq	65.81	
Cation	meq	60.30	
WYDEQ A/C Balance	%	-4.37	-5 – +5
Calc TDS	mg/l	3996	
TDS A/C Balance	dec. %	1.07	0.90 – 1.10

Report Approved by:

*R.A. Marling* /psl

PIM 13442cbr.wk3

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INT-021C

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Report Date: 03-05-96

Sample I.D.:

PM-9 (P-97)

Sample Date:

02-16-96

Sample Number:

96-13449

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	126	1.0
Magnesium (Mg)	mg/l	36.2	1.0
Sodium (Na)	mg/l	1156	1.0
Potassium (K)	mg/l	45.1	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1192	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1351	1.0
Chloride (Cl)	mg/l	654	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	< 0.05	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.67	0.10
Fluoride (F)	mg/l	0.24	0.10
Silica (SiO <sub>2</sub> )	mg/l	26.1	1.0

**Non – Metals**

Total Dissolved Solids (TDS) @ 180°C	mg/l	3791	1.0
Conductivity	µmho/cm	5585	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	977	1.0
pH	std. units	7.66	0.10

**Trace Metals**

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.017	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.20	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.02	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.05	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.35	0.10
Nickel (Ni)	mg/l	< 0.05	0.05
Selenium (Se)	mg/l	0.161	0.001
Vanadium (V)	mg/l	0.23	0.10
Zinc (Zn)	mg/l	0.10	0.01

**Radiometric**

Uranium (U <sup>Nat</sup> )	mg/l	14.51	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	709	0.2
Radium Precision ±		10.0	

**Quality Assurance Data****Acceptance Range**

Anion	meq	66.18	
Cation	meq	60.76	
WYDEQ A/C Balance	%	-4.27	-5 – +5
Calc TDS	mg/l	3994	
TDS A/C Balance	dec. %	0.95	0.90 – 1.10

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INT-021C

P.O. BOX 3258 • CASPER, WY 82602 • PHONE (307) 235-0515  
254 NORTH CENTER, SUITE 100 • CASPER, WY 82601 • FAX (307) 234-1639**WATER ANALYSIS REPORT – Crow Butte Resources**

Report Date: 03-05-96

Sample I.D.:

Sample Date:

Sample Number:

CMI-4 (I-144)

02-15-96

96-13445

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	123	1.0
Magnesium (Mg)	mg/l	33.3	1.0
Sodium (Na)	mg/l	1203	1.0
Potassium (K)	mg/l	42.9	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1351	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1211	1.0
Chloride (Cl)	mg/l	655	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	0.14	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.67	0.10
Fluoride (F)	mg/l	0.41	0.10
Silica (SiO <sub>2</sub> )	mg/l	31.3	1.0

**Non – Metals**

Total Dissolved Solids (TDS) @ 180°C	mg/l	4142	1.0
Conductivity	µmho/cm	6061	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	1107	1.0
pH	std. units	7.58	0.10

**Trace Metals**

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.031	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.09	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.01	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.15	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.40	0.10
Nickel (Ni)	mg/l	< 0.05	0.05
Selenium (Se)	mg/l	0.131	0.001
Vanadium (V)	mg/l	0.40	0.10
Zinc (Zn)	mg/l	0.12	0.01

**Radiometric**

Uranium (U <sup>nat</sup> )	mg/l	8.188	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	1697	0.2
Radium Precision ±		13.3	

**Quality Assurance Data****Acceptance Range**

Anion	meq	65.90	
Cation	meq	62.37	
WYDEQ A/C Balance	%	-2.75	-5 – +5
Calc TDS	mg/l	3979	
TDS A/C Balance	dec. %	1.04	0.90 – 1.10



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## WATER ANALYSIS REPORT – Crow Butte Resources

Report Date: 03-05-96

Sample I.D.:

CMI-5 (I-175P)

Sample Date:

02-16-96

Sample Number:

96-13448

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	124	1.0
Magnesium (Mg)	mg/l	34.0	1.0
Sodium (Na)	mg/l	1105	1.0
Potassium (K)	mg/l	37.8	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1312	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1163	1.0
Chloride (Cl)	mg/l	610	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	0.38	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	< 0.10	0.10
Fluoride (F)	mg/l	0.37	0.10
Silica (SiO <sub>2</sub> )	mg/l	23.6	1.0

### Non – Metals

Total Dissolved Solids (TDS) @ 180°C	mg/l	3955	1.0
Conductivity	µmho/cm	5743	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	1075	1.0
pH	std. units	7.64	0.10

### Trace Metals

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.035	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.13	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.03	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.37	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.44	0.10
Nickel (Ni)	mg/l	< 0.05	0.05
Selenium (Se)	mg/l	0.022	0.001
Vanadium (V)	mg/l	0.63	0.10
Zinc (Zn)	mg/l	0.08	0.01

### Radiometric

Uranium (U <sup>nat</sup> )	mg/l	35.03	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	3038	0.2
Radium Precision ±		20.1	

### Quality Assurance Data

### Acceptance Range

Anion	meq	62.95	
Cation	meq	58.11	
WYDEQ A/C Balance	%	-4.00	-5 – +5
Calc TDS	mg/l	3755	
TDS A/C Balance	dec. %	1.05	0.90 – 1.10

**ENERGY LABORATORIES, INC.**

INT-021C

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254 NORTH CENTER, SUITE 100 • CASPER, WY 82601 • FAX (307) 234-1639**WATER ANALYSIS REPORT – Crow Butte Resources**

Report Date: 03-05-96

Sample I.D.:

I-142

Sample Date:

02-16-96

Sample Number:

96-13451

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	93.3	1.0
Magnesium (Mg)	mg/l	26.4	1.0
Sodium (Na)	mg/l	1028	1.0
Potassium (K)	mg/l	37.7	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1049	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1106	1.0
Chloride (Cl)	mg/l	601	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	< 0.05	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.32	0.10
Fluoride (F)	mg/l	< 0.10	0.10
Silica (SiO <sub>2</sub> )	mg/l	24.8	1.0

**Non – Metals**

Total Dissolved Solids (TDS) @ 180°C	mg/l	3601	1.0
Conductivity	µmho/cm	5346	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	860	1.0
pH	std. units	7.75	0.10

**Trace Metals**

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.023	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.05	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	< 0.01	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.18	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.48	0.10
Nickel (Ni)	mg/l	< 0.05	0.05
Selenium (Se)	mg/l	0.051	0.001
Vanadium (V)	mg/l	1.27	0.10
Zinc (Zn)	mg/l	0.05	0.01

**Radiometric**

Uranium (U <sup>nat</sup> )	mg/l	7.380	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	1268	0.2
Radium Precision ±		13.0	

**Quality Assurance Data****Acceptance Range**

Anion	meq	57.21	
Cation	meq	52.56	
WYDEQ A/C Balance	%	-4.24	-5 – +5
Calc TDS	mg/l	3444	
TDS A/C Balance	dec. %	1.05	0.90 – 1.10



# ENERGY LABORATORIES, INC.

INT-021C

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## WATER ANALYSIS REPORT – Crow Butte Resources

Report Date: 03-05-96

Sample I.D.:

Sample Date:

Sample Number:

I-180

02-16-96

96-19452

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	109	1.0
Magnesium (Mg)	mg/l	29.2	1.0
Sodium (Na)	mg/l	1081	1.0
Potassium (K)	mg/l	39.5	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1192	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1097	1.0
Chloride (Cl)	mg/l	640	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	< 0.05	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	1.20	0.10
Fluoride (F)	mg/l	0.43	0.10
Silica (SiO <sub>2</sub> )	mg/l	31.5	1.0

### Non – Metals

Total Dissolved Solids (TDS) @ 180°C	mg/l	3757	1.0
Conductivity	µmho/cm	5550	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	977	1.0
pH	std. units	7.96	0.10

### Trace Metals

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.035	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.16	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.03	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.11	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.49	0.10
Nickel (Ni)	mg/l	< 0.05	0.05
Selenium (Se)	mg/l	0.119	0.001
Vanadium (V)	mg/l	0.92	0.10
Zinc (Zn)	mg/l	0.08	0.01

### Radiometric

Uranium (U <sup>Nat</sup> )	mg/l	3.320	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	1622	0.2
Radium Precision ±		14.4	

### Quality Assurance Data

### Acceptance Range

Anion	meq	60.54	
Cation	meq	55.92	
WYDEQ A/C Balance	%	-3.96	-5 – +5
Calc TDS	mg/l	3630	
TDS A/C Balance	dec. %	1.04	0.90 – 1.10

**ENERGY LABORATORIES, INC.**

INT-021C

P.O. BOX 3258 • CASPER, WY 82602 • PHONE (307) 235-0515  
254 NORTH CENTER, SUITE 100 • CASPER, WY 82601 • FAX (307) 234-1639**WATER ANALYSIS REPORT -- Crow Butte Resources**

Report Date: 03-05-96

Sample I.D.:

Sample Date:

Sample Number:

P-21 (I-137)

02-16-96

96-13450

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	140	1.0
Magnesium (Mg)	mg/l	38.0	1.0
Sodium (Na)	mg/l	1186	1.0
Potassium (K)	mg/l	46.0	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1232	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1406	1.0
Chloride (Cl)	mg/l	668	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	0.09	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.61	0.10
Fluoride (F)	mg/l	0.94	0.10
Silica (SiO <sub>2</sub> )	mg/l	31.0	1.0

**Non - Metals**

Total Dissolved Solids (TDS) @ 180°C	mg/l	4298	1.0
Conductivity	µmho/cm	6084	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	1010	1.0
pH	std. units	7.44	0.10

**Trace Metals**

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.022	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.25	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.04	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.12	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.34	0.10
Nickel (Ni)	mg/l	< 0.05	0.05
Selenium (Se)	mg/l	0.059	0.001
Vanadium (V)	mg/l	0.60	0.10
Zinc (Zn)	mg/l	0.10	0.01

**Radiometric**

Uranium (U <sup>NaC</sup> )	mg/l	36.88	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	2101	0.2
Radium Precision ±		21.4	

**Quality Assurance Data****Acceptance Range**

Anion	meq	68.41	
Cation	meq	62.94	
WYDEQ A/C Balance	%	-4.16	-5 - +5
Calc TDS	mg/l	4135	
TDS A/C Balance	dec. %	1.04	0.90 - 1.10



# ENERGY LABORATORIES, INC.

INT-021

P.O. BOX 3258 • CASPER, WY 82602 • PHONE (307) 235-0515  
254 NORTH CENTER, SUITE 100 • CASPER, WY 82601 • FAX (307) 234-1639

## WATER ANALYSIS REPORT – Crow Butte Resources

Report Date: 03-05-96

Sample I.D.:

Sample Date:

Sample Number:

P-113

02-15-96

96-13447

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	85.3	1.0
Magnesium (Mg)	mg/l	22.0	1.0
Sodium (Na)	mg/l	962	1.0
Potassium (K)	mg/l	35.7	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	922	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1040	1.0
Chloride (Cl)	mg/l	581	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	< 0.05	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	1.54	0.10
Fluoride (F)	mg/l	0.38	0.10
Silica (SiO <sub>2</sub> )	mg/l	24.4	1.0

### Non – Metals

Total Dissolved Solids (TDS) @ 180°C	mg/l	3268	1.0
Conductivity	µmho/cm	5006	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	756	1.0
pH	std. units	7.69	0.10

### Trace Metals

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.025	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	0.91	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	0.02	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.21	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.43	0.10
Nickel (Ni)	mg/l	0.10	0.05
Selenium (Se)	mg/l	0.273	0.001
Vanadium (V)	mg/l	0.64	0.10
Zinc (Zn)	mg/l	0.05	0.01

### Radiometric

Uranium (U <sup>235</sup> )	mg/l	9.826	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	1110	0.2
Radium Precision ±		10.9	

### Quality Assurance Data

### Acceptance Range

Anion	meq	53.29	
Cation	meq	48.87	
WYDEQ A/C Balance	%	-4.33	-5 – +5
Calc TDS	mg/l	3219	
TDS A/C Balance	dec. %	1.02	0.90 – 1.10

**ENERGY LABORATORIES, INC.**

INT-021

P.O. BOX 3258 • CASPER, WY 82602 • PHONE (307) 235-0515  
254 NORTH CENTER, SUITE 100 • CASPER, WY 82601 • FAX (307) 234-1639**WATER ANALYSIS REPORT – Crow Butte Resources**

Report Date: 03-05-96

Sample I.D.:

Sample Date:

Sample Number:

BL-3 (I-136)

02-15-96

96-13443

Major Ions	Units	Results	Detection Limit
Calcium (Ca)	mg/l	118	1.0
Magnesium (Mg)	mg/l	32.1	1.0
Sodium (Na)	mg/l	1154	1.0
Potassium (K)	mg/l	40.0	1.0
Carbonate (CO <sub>3</sub> )	mg/l	0	0.10
Bicarbonate (HCO <sub>3</sub> )	mg/l	1364	0.10
Sulfate (SO <sub>4</sub> )	mg/l	1138	1.0
Chloride (Cl)	mg/l	624	1.0
Ammonium (NH <sub>4</sub> ) as N	mg/l	0.41	0.05
Nitrite (NO <sub>2</sub> ) as N	mg/l	< 0.10	0.10
Nitrate (NO <sub>3</sub> ) as N	mg/l	0.89	0.10
Fluoride (F)	mg/l	0.42	0.10
Silica (SiO <sub>2</sub> )	mg/l	29.9	1.0

**Non – Metals**

Total Dissolved Solids (TDS) @ 180°C	mg/l	4077	1.0
Conductivity	µmho/cm	5993	1.0
Alkalinity; measured as CaCO <sub>3</sub>	mg/l	1118	1.0
pH	std. units	7.56	0.10

**Trace Metals**

Aluminum (Al)	mg/l	< 0.10	0.10
Arsenic (As)	mg/l	0.042	0.001
Barium (Ba)	mg/l	< 0.10	0.10
Boron (B)	mg/l	1.12	0.10
Cadmium (Cd)	mg/l	< 0.01	0.01
Chromium (Cr)	mg/l	< 0.05	0.05
Copper (Cu)	mg/l	< 0.01	0.01
Iron (Fe)	mg/l	< 0.05	0.05
Lead (Pb)	mg/l	< 0.05	0.05
Manganese (Mn)	mg/l	0.93	0.01
Mercury (Hg)	mg/l	< 0.001	0.001
Molybdenum (Mo)	mg/l	0.41	0.10
Nickel (Ni)	mg/l	0.05	0.05
Selenium (Se)	mg/l	0.124	0.001
Vanadium (V)	mg/l	0.72	0.10
Zinc (Zn)	mg/l	0.11	0.01

**Radiometric**

Uranium (U <sup>nat</sup> )	mg/l	3.600	0.0003
Radium 226 (Ra <sup>226</sup> )	pCi/l	2108	0.2
Radium Precision ±		14.8	

**Quality Assurance Data****Acceptance Range**

Anion	meq	63.74	
Cation	meq	59.87	
WYDEQ A/C Balance	%	-3.13	-5 – +5
Calc TDS	mg/l	3824	
TDS A/C Balance	dec. %	1.07	0.90 – 1.10



# ENERGY LABORATORIES, INC.

SHIPPING: 2393 SALT CREEK HIGHWAY • CASPER, WY 82601

MAILING: P.O. BOX 3258 • CASPER, WY 82602

E-mail: energy@trib.com • FAX: (307) 234-1639 • PHONE: (307) 235-0515 • TOLL FREE: (888) 235-0515

INT-021

## LABORATORY ANALYSIS REPORT CROW BUTTE RESOURCES

Sample ID:  
Sample Date:  
Sample Matrix:  
Laboratory ID:  
Report Date:

Sample #1 MU#3 Inj.  
07-23-99  
Water  
99-36358  
August 16, 1999

Major Ions		Method	Units	Reporting Limit	Results
Calcium	Ca	EPA 200.7	mg/L	1.0	95.0
Magnesium	Mg	EPA 200.7	mg/L	1.0	25.0
Sodium	Na	EPA 200.7	mg/L	1.0	1240
Potassium	K	EPA 200.7	mg/L	1.0	40.0
Carbonate	CO <sub>3</sub>	SM 2320 B.	mg/L	1.0	< 1.0
Bicarbonate	HCO <sub>3</sub>	SM 2320 B.	mg/L	1.0	1440
Sulfate	SO <sub>4</sub>	SM 4500-SO <sub>4</sub> E.	mg/L	1.0	740
Chloride	Cl	SM 4500-Cl B.	mg/L	1.0	681
Ammonium as N	NH <sub>4</sub>	EPA 350.1	mg/L	0.05	< 0.05
Nitrite as N	NO <sub>2</sub>	SM 4500-NO <sub>2</sub> B.	mg/L	0.10	< 0.10
Nitrate + Nitrite as N	NO <sub>3</sub> + NO <sub>2</sub>	EPA 353.2	mg/L	0.10	0.49
Fluoride	F	SM 4500-F C.	mg/L	0.10	0.47
Silica	SiO <sub>2</sub>	EPA 200.7	mg/L	1.0	21.5

Non-Metals		Method	Units	Reporting Limit	Results
Total Dissolved Solids @ 180°C	TDS	SM 2540 C. Mod.	mg/L	2.0	3680
Conductivity		EPA 120.1	µmho/cm	1.0	6020
Alkalinity	CaCO <sub>3</sub>	SM 2320 B.	mg/L	1.0	1180
pH		SM 4500-H B.	std. units	0.10	7.81

Trace Metals		Method	Units	Reporting Limit	Results
Aluminum	Al	EPA 200.7	mg/L	0.10	< 0.10
Arsenic	As	EPA 200.8	mg/L	0.001	0.062
Barium	Ba	EPA 200.7	mg/L	0.10	< 0.10
Boron	B	EPA 200.7	mg/L	0.10	1.0
Cadmium	Cd	EPA 200.8	mg/L	0.005	< 0.005
Chromium	Cr	EPA 200.7	mg/L	0.05	< 0.05
Copper	Cu	EPA 200.7	mg/L	0.01	0.06
Iron	Fe	EPA 200.7	mg/L	0.05	< 0.05
Lead	Pb	EPA 200.7	mg/L	0.05	< 0.05
Manganese	Mn	EPA 200.7	mg/L	0.01	0.07
Mercury	Hg	EPA 200.8	mg/L	0.001	< 0.001
Molybdenum	Mo	EPA 200.7	mg/L	0.10	0.40
Nickel	Ni	EPA 200.7	mg/L	0.05	< 0.05
Selenium	Se	EPA 200.8	mg/L	0.001	0.065
Vanadium	V	EPA 200.7	mg/L	0.10	1.10
Zinc	Zn	EPA 200.7	mg/L	0.01	0.10

Radiometrics		Method	Units	Reporting Limit	Results
Uranium	Nat-U	EPA 200.8	mg/L	0.0003	2.10
Radium 226	<sup>226</sup> Ra	EPA 903.0	pCi/L	0.2	991
Radium Error Estimate ±					9.4

Quality Assurance Data			Target Range	
Anion		meq		58.26
Cation		meq		61.80
WYDEQ A/C Balance		%	-5 - +5	2.95
Calc TDS		mg/L		3565
TDS A/C Balance		dec. %	0.80 - 1.20	1.03



**CAMECO RESOURCES**

Crow Butte Operation  
86 Crow Butte Road  
P.O. Box 169  
Crawford, NE  
69339 USA

---

Mr. Ron Burrows, Project Manager  
Decommissioning and Uranium Recovery Licensing  
Directorate  
Division of Waste Management and Environmental  
Protection  
Office of Federal and State Materials and  
Environmental Management Programs  
Mailstop T8-F5  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

## IN THE DISTRICT COURT OF LANCASTER COUNTY, NEBRASKA

STATE OF NEBRASKA, ex rel.,  
MICHAEL J. LINDER, Director  
NEBRASKA DEPARTMENT OF  
ENVIRONMENTAL QUALITY,

LANCASTER COUNTY Case No. CIV-2248

2003 MAY 23 AM 8 57

CLERK OF THE  
DISTRICT COURT

Plaintiff,

v.

CROW BUTTE RESOURCES, INC., a  
Nebraska Corporation,

Defendant.

**CONSENT DECREE**

Plaintiff, the Nebraska Department of Environmental Quality ("NDEQ"), proceeding on its Complaint filed herein and appearing through its counsel, Jon C. Bruning, Attorney General, and the Defendant, Crow Butte Resources, Inc., a Nebraska Corporation, appearing through its counsel, Mark D. McGuire, and each party having consented to the making and entering of this Consent Decree without trial, the Court finds that the Consent Decree should be and hereby is entered.

IT IS THEREFORE ORDERED AND DECREED as follows:

1. The court has jurisdiction of the parties and the subject matter of this action. The Complaint herein sets forth justiciable causes of action against Defendant.

2. NDEQ, in its Complaint, alleges that beginning on or about July 1, 2003, and continuing daily thereafter until March 31, 2006, Defendant Crow Butte Resources, Inc., (hereinafter CBR), violated its Underground Injection Control (hereinafter UIC) Permit No. NE0122611 by releasing well development water

upon the surface of the ground during CBR's well development and drilling process. CBR recycled its well development water as a conservation measure, rather than treating it as a waste stream and collecting and retaining such water in CBR's lined evaporation ponds, contrary to the terms of its UIC permit. Such treatment of its well development water did not result in any pollution of either the surface of the ground or any aquifer thereunder. CBR discovered this process potentially violated the literal terms of its UIC permit on or about March 31, 2006, and self-reported it to the DEQ's on-site inspector on or about April 7, 2006.

3. NDEQ further alleges that Defendant is therefore subject to a civil penalty as provided in Neb. Rev. Stat. §81-1508.02(2) (Reissue 1999).

4. The parties agree that settlement of these matters is in the public interest and entry of this Consent Decree is the most appropriate means of resolving their dispute. Defendant, without admitting any allegations of the Complaint, agrees to the form and entry of this Consent Decree for purposes of settlement only.

5. The parties agree that this Consent Decree shall be in full satisfaction of all claims alleged in the Complaint and arising out of the same transaction or occurrence asserted therein, provided that such claims were known or were reasonably ascertainable from information in the State's possession as of the date of the filing of this Consent Decree.

6. IT IS THEREFORE ORDERED that Defendant shall pay to the Clerk of the District Court of Lancaster County a civil penalty in the sum of fifty thousand dollars (\$50,000) pursuant to Neb. Rev. Stat. §81-1508.02, together

with court costs in the amount of seventy-nine dollars (\$79.00). Said penalty is to be handled pursuant to Article VII, Section V, of the Nebraska Constitution.

A. \$25,000 (twenty-five thousand dollars) of said penalty will be imposed immediately upon the entry of this Consent Decree by the Court, and is due no later than 10 (ten) days after the entry of this Consent Decree by the Court.

B. \$25,000 (twenty-five thousand dollars) of said penalty will be due and owing 180 days following the approval of this Consent Decree by the Court. In the event that said Defendant continues to maintain compliance with the following obligations and provisions, during the time period between the approval of this Consent Decree by the District Court and 180 days following that approval, the \$25,000 (twenty-five thousand dollars) of civil penalties will be waived:

1. The Environmental Protection Act, Neb. Rev. Stat. §81-1501 *et seq*;
2. Title 122 of the Nebraska Administrative Code, "Rules and Regulations for Underground Injection and Mineral Production Wells;" and
3. Defendant's UIC Permit No. NE0122611 and all conditions and provisions related thereto.

C. To qualify for the \$25,000 (twenty-five thousand dollars) waiver of civil penalties as stated in paragraph 6(B), Defendant shall file a showing with the

Court within 30 (thirty) days following the due date of the civil penalties establishing that it has maintained compliance as required. If the Defendant does not receive a Notice of Violation from NDEQ and is not a party to legal action initiated by the NDEQ disputing compliance with the statutes and regulatory provisions in paragraph 6(B) during the relevant time period, NDEQ shall file a Satisfaction of Judgment in the case within ten days of receipt of Defendant's showing. If Defendant receives a Notice of Violation from NDEQ, or is a party to legal action initiated by NDEQ disputing compliance with the statutes and regulatory provisions in paragraph 6(B) during the relevant time period, NDEQ shall file an objection to Defendant's showing and determination of this waiver provision will be stayed pending ongoing enforcement proceedings.

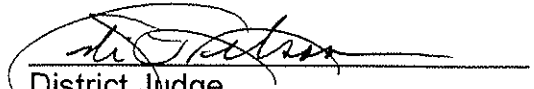
7. IT IS FURTHER ORDERED that the Defendant shall pay, as a Supplemental Environmental Project, the sum of 50,000 (fifty thousand dollars) into the Attorney General's Environmental Protection Fund to be used for environmental safety, training, public awareness, or other related uses as permitted by state law, at the sole discretion of the Nebraska Attorney General. This sum shall be paid as a lump-sum payment due no later than 10 (ten) days after the entry of this Consent Decree.

8. This Consent Decree will have no effect on any enforcement action brought by NDEQ against Defendant for future violations of any statutes or regulations.

9. The undersigned consent without further notice to the form and entry of the foregoing Consent Decree.

DATED THIS 23 day of May, 2008, in Lancaster County, Nebraska.

BY THE COURT:


  
 District Judge  
**JODI L. NELSON**

STATE OF NEBRASKA ex rel.  
 MICHAEL J. LINDER, Director  
 Department of Environmental  
 Quality, Plaintiff,

BY: JON BRUNING #20351  
 Attorney General

BY:   
 Katherine J. Spohn #22976  
 Assistant Attorney General  
 2115 State Capitol Bldg.  
 Lincoln, NE 68509  
 Tel. (402) 471-2682  
 katie.spohn@nebraska.gov  
Attorneys for Plaintiff.

CROW BUTTE RESOURCES, INC.,  
 a Nebraska Corporation, Defendant

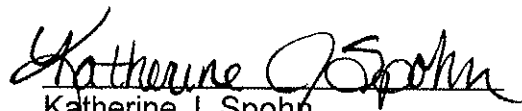
BY:   
 Mark D. McGuire  
 McGuire and Norby  
 605 South 14<sup>th</sup> Street, Suite 100  
 Lincoln, NE 68508  
 Tel. (402) 434-2390  
Attorney for Defendant.

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Consent  
 Decree has been served upon the Defendant by ~~regular United States mail, first~~  
hand Delivery

class postage prepaid on this <sup>23<sup>rd</sup></sup>~~22<sup>nd</sup>~~ day of May, 2008 addressed to the Defendant's attorney of record as follows:

Mark D. McGuire  
McGuire and Norby  
605 South 14<sup>th</sup> Street, Suite 100  
Lincoln, NE 68508

  
Katherine J. Spohn  
Assistant Attorney General

**SUZANNE M. KIRKLAND**  
**CLERK of the DISTRICT COURT**  
**LANCASTER COUNTY**  
575 South 10<sup>th</sup> Street  
Lincoln, Nebraska 68508-2810  
402-441-7328/Fax 402-441-6190

**IN THE DISTRICT COURT OF LANCASTER COUNTY, NEBRASKA**

**--CERTIFICATE--**

I, Simon G. Rezac, Deputy Clerk of the District Court of Lancaster County, Nebraska, do hereby certify that the foregoing is/are a full and correct copy/copies of the original instrument(s) duly filed and or record in this court. This Certificate, which bears the seal of the District Court of Lancaster County, State of Nebraska, USA, was signed on MAY 23 2008.

By:   
Simon G. Rezac, Deputy Clerk



## IN THE DISTRICT COURT OF LANCASTER COUNTY, NEBRASKA

STATE OF NEBRASKA, ex rel.,  
 MICHAEL J. LINDER, Director  
 NEBRASKA DEPARTMENT OF  
 ENVIRONMENTAL QUALITY,

Plaintiff,

v.

CROW BUTTE RESOURCES, INC., a  
 Nebraska Corporation,

Defendant.

Case No. \_\_\_\_\_

**COMPLAINT**

COMES NOW, Michael J. Linder, Director of the Department of Environmental Quality, who institutes this action through Jon C. Bruning, Attorney General, on behalf of the State of Nebraska, and alleges as follows:

**FIRST CLAIM**

1. The Nebraska Department of Environmental Quality (hereinafter NDEQ), is at all times alleged herein, the agency of the State of Nebraska charged with the duty, pursuant to Neb. Rev. Stat. §81-1504(1) (Reissue 1999), of exercising exclusive general supervision, administration, and enforcement of the Environmental Protection Act (hereinafter the Act), Neb. Rev. Stat. §81-1501 *et seq* (Reissue 1999 and Cum. Supp. 2006) and all rules, regulations, and permits created thereunder.

2. Defendant Crow Butte Resources, Inc. (hereinafter CBR), at all times alleged herein, is a Nebraska corporation which owns and operates an in-situ uranium mining facility which is located on approximately 2,840 acres in all or portions of Sections 11, 12, and 13 of Township 31 North, Range 52 West of the

6<sup>th</sup> P.M., Dawes County, Nebraska, and Sections 18, 19, 20, 29, and 30 of Township 31 North, Range 51 West of the 6<sup>th</sup> P.M., Dawes County, Nebraska.

3. Pursuant to its authority under Neb. Rev. Stat. §81-1504(11) (Cum. Supp. 2006), NDEQ issued an Underground Injection Control (hereinafter UIC) Permit to CBR, UIC Permit No. NE0122611 which required:

All of the liquid waste streams shall be collected and retained in the lined evaporation ponds, or disposed of in a permitted deep disposal well as approved by the Department. This permit does not authorize any wastewater discharge to the land surface or surface waters of the State.

4. Violation of a permit condition or limitation is a violation of Neb. Rev. Stat. §81-1508.02(1)(b).

5. Beginning on or about July 1, 2003, and continuing daily thereafter until March 31, 2006, Defendant CBR violated its UIC Permit No. NE0122611 by releasing well development water upon the surface of the ground during CBR's well development and drilling process.

6. Pursuant to Neb. Rev. Stat. §81-1508.02, a civil penalty, not to exceed ten thousand dollars (\$10,000.00), is warranted for each day of violation.

## SECOND CLAIM

7. Plaintiff hereby incorporates by reference each and every allegation contained in paragraphs 1 through 6 as if fully stated herein.

8. Defendant CBR's UIC Permit No. NE0122611 further prohibited the use of Chadron Formation well development water as drilling water and required Defendants to treat well development water from the Chadron Formation as a liquid waste stream to be collected and retained in lined evaporation ponds.

9. Beginning on or about July 1, 2003, and continuing daily thereafter until on or about March 31, 2006, Defendant CBR, used Chadron Formation well development water as drilling water in violation of UIC Permit No. NE0122611.

### THIRD CLAIM

10. Plaintiff hereby incorporates by reference each and every allegation contained in paragraphs 1 through 9 as if fully stated herein.

11. At all times alleged herein, Nebraska Administrative Code Title 122 "Rules and Regulations for Underground Injection and Mineral Production Wells" (hereinafter Title 122) was in full force and effect and applied to the Defendant's facility and activities.

12. Title 122, Chapter 4, §001 prohibits an owner or operator from constructing an injection well or mineral production well in a manner that allows the movement of fluid containing any contaminant into underground sources of drinking water if the presence of the contaminant may cause a violation of any primary drinking water regulation or may otherwise adversely affect the health and safety of persons.

13. Defendant CBR, on a daily basis from on or about July 1, 2003 until March 31, 2006, constructed injection wells and mineral production wells in a manner that had the potential to allow the movement of fluid containing contaminants into an underground source of drinking water, in violation of Title 122, Chapter 4, §001.

14. Neb. Rev. Stat. §81-1508.02(1)(e) (Cum. Supp. 2006) makes it

unlawful for any person to violate any rules or regulations adopted and promulgated pursuant to such Act.

#### FOURTH CLAIM

15. Plaintiff hereby incorporates by reference each and every allegation contained in paragraphs 1 through 14 as if fully stated herein.

21. Title 122 Chapter 21 §001.06 further requires a permittee to provide written notification to NDEQ of any noncompliance which may endanger the health and safety of persons or cause pollution of the environment within five days of the time the permittee becomes aware of the noncompliance.

23. Defendant CBR became aware of the noncompliance on or about March 31, 2006 and failed to provide written notification to NDEQ as required by Title 122 Chapter 21 §001.06 until May 12, 2006.

WHEREFORE, NDEQ prays that judgment on its Claims be entered herein in favor of NDEQ and against Defendant in the form of a civil penalty as provided under Neb. Rev. Stat. §81-1508.02, together with the costs of the action and such other relief as the Court deems just and equitable.

STATE OF NEBRASKA ex rel.  
MICHAEL J. LINDER, Director  
Department of Environmental  
Quality, Plaintiff,

BY: JON BRUNING #20351  
Attorney General

BY: \_\_\_\_\_  
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Attorneys for Plaintiff

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Complaint has been served upon the Defendant by regular United States mail, first class postage prepaid on this \_\_\_ day of May, 2008 addressed to the Defendant's attorney of record as follows:

Mark D. McGuire  
McGuire and Norby  
605 South 14<sup>th</sup> Street, Suite 100  
Lincoln, NE 68508

\_\_\_\_\_  
Katherine J. Spohn  
Assistant Attorney General