

September 30, 2018

Dominick Orlando, Sr. Project Manager  
Materials Decommissioning Branch  
Division of Decommissioning, Uranium Recovery and Waste Programs  
Office of Nuclear Materials Safety and Safeguards  
Mail Stop T5-A10  
11545 Rockville Pike  
Rockville, Maryland 20852-2738

Re: American Nuclear Gas Hills Mill Site

Mr. Orlando:

In response to your letter of August 30, 2018, I am providing the following information.

By the latter 1990s ANC had wound up its business affairs, disposed of what little assets it had, and completed the DOE Title X filings. All that remained of the company was its ownership of the Gas Hills Mill Site and NRC license. ANC continued to maintain its corporate existence solely for the purpose of transferring the mill site to the DOE and the termination of the NRC license. After waiting for 23 years for this to happen, the directors decided in 2017 that continuing to maintain the corporation was no longer feasible. The lack of funds, together with the ongoing uncertainty of when the WDEQ would complete reclamation, when the DOE would accept the mill site, and when the NRC would terminate the license led to this decision. The Corporation was dissolved in Colorado, its state of incorporation, final federal and state tax returns were filed, and ANC's license to do business in Wyoming was allowed to expire in 2017. No other actions were planned for the winding up of ANC's business.

Record title of the Gas Hills mill site is in ANC's name. The surface and locatable minerals are owned by ANC. The leasable minerals are owned by the BLM and the unappropriated water is controlled by the State of Wyoming. There are no active right of ways within the restricted area. ANC does not have formal documentation for this information.

ANC has not received a certificate of revocation from the Wyoming Secretary of State. I am not aware that they do this for foreign corporations. I do not believe that ANC, being a dissolved Colorado corporation, is allowed to transact business in Wyoming and therefor unable to transfer the mill site property rights.

The 2017 Fremont County, Wyoming property taxes are delinquent and the 2018 taxes will be delinquent later this year. Wyoming tax law allows for a third-party to pay the delinquent taxes and acquire the property if certain statutory requirements are met. The tax deed from Fremont County would convey all of the property rights ANC has in the mill site, both surface and mineral. Pursuing this avenue is a viable solution to getting title out of ANC.

The former directors/officers of ANC regret that the mill site did not get transferred to the DOE and the license terminated, but that was not within ANC's control. We believe that we did our best by keeping the corporation alive for 23 years which was no small feat.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. O'Brien". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.