

November 22, 2019

Mr. Ken Kalman  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852-2738

Re: Docket No. 70-925; License No. SNM-928  
License Amendment Request to Redefine the Licensed Area

Dear Sirs:

Solely as Trustee for the Cimarron Environmental Response Trust (CERT), Environmental Properties Management LLC (EPM) submits herein to the US Nuclear Regulatory Commission (NRC) a request to amend License SNM-928 to re-define the area under license.

EPM submitted *Facility Decommissioning Plan – Rev 1<sup>1</sup>* (the DP) to the NRC and the Oklahoma Department of Environmental Quality (DEQ) on November 2, 2018. Following discussions with the NRC, EPM submitted a proposed revision to the DP on June 7, 2019. That revision included a proposal to amend License SNM-928 to re-define the licensed area. During subsequent discussions, NRC decided that amending the license to re-define the licensed area would be addressed separately from the DP. Consequently, this submittal supersedes the June 7, 2019 letter.

#### Basis for the Current Definition of the Licensed Area

Based on knowledge of the processing, transport, and disposal activities that occurred during the facility's operating years, as well as information obtained during radiological site characterization, in 1994 the Cimarron Site was divided into the following three "Phase" areas:

1. "Phase I Unaffected Areas", defined as areas within which soil or surface contamination was not expected to exceed background levels.
2. "Phase II Affected and Unaffected Areas", defined as areas within with soil or surface contamination was expected to exceed background, but may not exceed license criteria.
3. "Phase III Affected Areas", defined as areas within which soil or surface contamination was known to exceed license criteria.

Each of these "Phase" areas were further divided into Subareas A through O. The boundaries of the Subareas were based on the locations of buildings, impoundments, roads, and former burial areas. No consideration was given to groundwater which did not comply with either license criteria or State criteria. The presence of uranium exceeding decommissioning criteria in groundwater was not known and was therefore not considered in the delineation of Subareas. The decommissioning of buildings, impoundments, roads, and former burial areas has been completed, and all but three of the 16 former Subareas have been released from the license.

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<sup>1</sup> Environmental Properties Management LLC, November 2018

The former Subarea designations are no longer relevant to the ongoing decommissioning of the Site. License SNM-928 now retains three of the former Subareas under license, and two of the three (Subareas G and N) have been demonstrated to comply with the decommissioning criteria for both soil and groundwater.

When license SNM-928 was transferred to the CERT, the February 16, 2011 license transfer order stated, “Final status surveys and confirmatory surveys have confirmed that Subareas G and N are releasable for unrestricted use, but NRC has determined that these areas should not be released until groundwater remediation is complete.” EPM proposes to re-define the licensed area based on knowledge of existing conditions and planned construction and operations. There is no reason to retain portions of former Subareas which have been demonstrated to be releasable for unrestricted use. Consequently, this license amendment request proposes to retain only those portions of Subareas G and N in which decommissioning operations will be performed under license. Additional discussion of Subareas G and N follows.

#### Why Redefine the Area Under License?

When final status surveys were performed for the former Subareas, groundwater exceeding the decommissioning criteria was not expected to be present except in and around four disposal trenches located in Subarea F. Site-wide groundwater assessment conducted after many areas had been released from the license identified groundwater exceeding the decommissioning criteria in portions of some of the former Subareas that had been released from the license.

A license amendment request (LAR) is needed to bring back under license those portions of the site within which:

- Groundwater exceeds license criteria.
- Groundwater exceeding license criteria will be stored, transferred, or treated during the groundwater remediation effort.
- Licensed material which has not yet been packaged for transportation in accordance with DOT regulations will be transferred from the Burial Area #1 (BA1) treatment facility to the Western Area Treatment Facility (WATF).
- Contaminated media, such as treatment resins containing concentrated uranium, will be stored and/or packaged for shipment for disposal.
- The NRC has not verified by confirmatory survey as releasable for unrestricted use.

This license amendment request proposes to retain only those portions of Subareas G and N in which decommissioning operations will be performed under license. Such an amendment would release most of Subareas G and N from the license, retaining only those portions of Subareas G and N that meet the above-stated criteria.

Additional discussion of Subareas G and N follows.

#### Subarea G

Subarea G was a “Phase II” area containing both affected and unaffected areas. The affected areas included the Site road over which licensed material had been transported, the path where the drainage east of Uranium Pond #1 routed water to the floodplain, and concrete rubble from the former uranium processing building, a portion of which had been placed in Subarea G. Most of Subarea G was considered unaffected land.

Release survey data for concrete slabs placed in Subarea G was reported in a letter dated September 16, 1998. A report on an NRC confirmatory survey of the concrete during a September 1998 inspection concluded that the released concrete slabs comply with license criteria. After performing a final status survey for the road, drainage, and land areas, *Final Status Survey Report, Subarea G*<sup>2</sup> was submitted to the NRC on October 21, 1999. The NRC performed a confirmatory survey for Subarea G in August 2001. The inspection included the collection and analysis of groundwater for both uranium and Tc-99. The November 26, 2001 NRC inspection report 70-925/01-01 concluded that Subarea G land **and groundwater** complies with license criteria.

In a letter dated March 12, 2002, the NRC stated,

“U.S. Nuclear Regulatory Commission (NRC) staff has identified regulatory issues concerning the release of Subareas G and K, related to the occurrence of technetium-99 (Tc-99) in Subarea G, and a need for an approved decommissioning schedule in your license. In response, NRC staff has decided to ... withhold release of Subarea G until Cimarron addresses the onsite Tc-99 contamination.”

Subsequent assessment of Tc-99 in groundwater demonstrated that Tc-99 concentrations were well below the NRC criterion for groundwater, and the NRC approved the discontinuation of monitoring for Tc-99 in a letter dated April 22, 2013. Consequently, the “onsite Tc-99 contamination” has been addressed from a license compliance perspective.

#### Subarea N

Subarea N was a “Phase III” area. Subarea N included Burial Area #4. Burial Area #4 contains soil that complies with the Option 2 criteria specified in License Condition 23, as promulgated in the 1981 Branch Technical Position *Disposal or Onsite Storage of Residual Thorium or Uranium (Either as Natural Ores or Without Daughters Present) From Past Operations*<sup>3</sup>. Subarea N also included the site road on which Option 2 soil was transported from stockpiles located near the former process buildings to Burial Area #4.

After Burial Area #4 was closed in compliance with license condition 23, a final status survey was conducted for Subarea N. *Final Status Survey Report for Subarea N*<sup>4</sup> was submitted to the NRC on January 31, 2002. The NRC performed a confirmatory survey for Subarea N in June 2002. The inspection included the collection and analysis of groundwater for both uranium and

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<sup>2</sup> Cimarron Corporation, October 1999

<sup>3</sup> US Nuclear Regulatory Commission, October 1981

<sup>4</sup> Cimarron Corporation, January 2002

Tc-99. The September 18, 2002 NRC inspection report 70-925/02-01 concluded that Subarea N land **and groundwater** complies with license criteria.

#### Subarea F

Subarea F was a “Phase III” area. Subarea F included trenches in which licensed material had been buried (then referred to as Burial Ground #1) and slabs of concrete removed from the former uranium processing building that had been placed in Subarea F for erosion control. Final status survey reports were submitted for:

- The excavated burial trenches, in *Decontamination and Final Survey Report for Cimarron Facility Contaminated Waste Burial Ground*<sup>5</sup>.
- The concrete rubble, in *Final Status Survey Report for Concrete Rubble in Sub-Area F*<sup>6</sup>.
- Soil, in *Final Status Survey Report, Sub-Area F*<sup>7</sup>.

The NRC has performed confirmatory surveys for the formal burial trenches and the concrete rubble in Subarea F, but the final status survey and confirmatory survey process has not been completed for both surface and subsurface soil. EPM proposes herein to retain the entirety of Subarea F under license.

#### Definition of Licensed and Controlled Areas

Based on the above considerations, this LAR proposes to include in License Condition 9 of License SNM-928, “Authorized Place of Use” those areas within which:

- Groundwater exceeds license criteria.
- Groundwater exceeding license criteria will be stored, transferred, or treated during the groundwater remediation effort.
- Licensed material which has not yet been packaged for transportation in accordance with DOT regulations will be transferred from the Burial Area #1 (BA1) treatment facility to the Western Area Treatment Facility (WATF).
- Contaminated media, such as treatment resins containing concentrated uranium, will be stored and/or packaged for shipment for disposal.
- The NRC has not verified by confirmatory survey as releasable for unrestricted use (Subarea F).

Attachment 1 to this license amendment request provides three figures depicting the proposed area to be included in License Condition 9. These figures depict the proposed “licensed” area and “controlled” areas. Licensed material cannot be accessed throughout most of the licensed area, because throughout the decommissioning of the site it will be present only in groundwater or in piping which will be located below grade. Red dashed lines on Figures 1 through 3 depict

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<sup>5</sup> Cimarron Corporation, November 1991.

<sup>6</sup> Cimarron Corporation, March 1998.

<sup>7</sup> NEXTEP Environmental, August 2005.



the extent of the proposed licensed area. The licensed area will be delineated on site by the following:

1. Monitor wells shown on Figures 1 and 2.
2. Cairns installed at the locations of former monitor wells that have been abandoned or at other “corners”.
3. A corridor extending perpendicularly 5 meters in both directions from the centerline of the site road.
4. After construction of water treatment facilities, fencing around controlled areas will define a portion of the licensed area.

Attachment 2 is a table listing the locations of the monitor wells, cairns, and fenceposts that will physically delineate the licensed area (excluding the site road).

Controlled areas will be fenced, except where the exterior walls of the WATF building provide control. Controlled areas are depicted by solid orange lines, and include those areas to which access needs to be is controlled because:

1. Groundwater containing licensed material is brought above ground to be treated.
2. Groundwater is treated to remove uranium and Tc-99 in ion exchange systems.
3. Treatment media is processed, packaged, and stored prior to shipment to a licensed disposal facility.

#### Figure 1 – Licensed and Controlled Areas in the Western Area

Figure 1 depicts the licensed and controlled areas in the western portion of the Site. A black isopleth depicts the area within which uranium concentrations exceed 100 micrograms per liter ( $\mu\text{g/L}$ ). The U-235 enrichment in this area varies, and 100  $\mu\text{g/L}$  is the lower concentration than would yield a total uranium activity of 180 picoCuries per liter ( $\text{pCi/L}$ ) at the highest conservatively estimated enrichment. Consequently, the black line represents a greater area than the area within which groundwater containing uranium exceeding the decommissioning criteria is present. The red dashed line extends beyond this area, providing additional “buffer” around the area within which groundwater contains uranium exceeding the decommissioning criteria.

The area within the red dashed line also includes the area in which piping will transport groundwater in which uranium exceeds the decommissioning criteria and the roadway over which vessels of spent resin will be transported from BA1 to the WATF.

The area bounded by the solid orange line represents the controlled area, and includes all areas within which:

- Groundwater containing uranium exceeding the decommissioning criteria is brought to the surface.
- Groundwater is treated to remove the uranium by ion exchange.

- Spent ion exchange resin is processed and packaged for shipment to a licensed disposal facility.
- Waste that contains concentrations of radioactive material requiring disposal as low level radioactive waste is stored or staged.

#### Figure 2 – Licensed and Controlled Areas in Burial Area #1

Figure 2 depicts the licensed and controlled areas in the eastern portion of the Site. A black isopleth depicts the area within which uranium concentrations exceed 201 µg/L. The conservative estimate of the U-235 enrichment in this area is 1.3%, and 201 µg/L is the concentration that would yield a total uranium activity of 180 pCi/L at that enrichment. Consequently, the black line represents the maximum potential extent of groundwater containing uranium exceeding the decommissioning criteria. The red dashed line extends beyond this area, providing additional “buffer” around the area within which groundwater contains uranium exceeding the decommissioning criteria.

The area within the red dashed line also includes the area in which piping will transport groundwater in which uranium exceeds the decommissioning criteria, the area within which groundwater will be treated to remove the uranium by ion exchange, and the roadway over which vessels of spent resin will be transported from BA1 to the WATF. This area also includes all of former Subarea F.

The area within the solid orange line is the controlled area, and includes all areas within which:

- Groundwater containing uranium exceeding the decommissioning criteria is brought to the surface.
- Groundwater is treated to remove the uranium by ion exchange.

Vessels containing spent resin will be removed from BA1 and transported to the WATF for processing, packaging, storage and shipment. Waste will not be stored or staged within BA1, except for incidental consumables such as gloves, filters, etc., that will be stored in a waste receptacle prior to transfer to the WATF; such waste will be transferred to the WATF at the end of each day.

#### Figure 3 – Licensed and Controlled Areas – Site Wide

This figure depicts the licensed and controlled areas throughout the Site, including the entire extent of the Site road between BA1 and the WATF.

Cross-hatching provided in Figure 3 identifies those portions of Subareas G and N that would be released from License SNM-928 should the license be amended in accordance with this request.

#### License Condition 23

License Condition 23 provides authorization to bury up to 14,000 cubic meters (500,000 cubic feet) of soil contaminated with low-enriched uranium containing up to 100 picoCuries per gram

(pCi/g) for soluble uranium and up to 250 pCi/g for insoluble uranium in the area now referred to as Burial Area #4 (BA4). BA4 is located in Subarea N.

*BTP Option 2 On-Site Disposal Cell Report*<sup>8</sup> provides a description of the characterization, placement, and covering of contaminated soil in BA4. Three trenches, labeled “Pit #1”, “Pit #2”, and “Pit #3” were excavated, backfilled with soil containing less than 100 pCi/g uranium, and covered in BA4.

Pit #1 contains 164,518 cubic feet (ft<sup>3</sup>) of soil containing an average uranium activity of 45.0 pCi/g. Pit #2 contains 155,950 ft<sup>3</sup> of soil containing an average uranium activity of 43.3 pCi/g. Pit #3 contains 131,718 ft<sup>3</sup> of soil containing an average uranium activity of 35.7 pCi/g. The total volume of contaminated soil in BA4 is therefore 452,185 ft<sup>3</sup> of soil containing an average uranium activity of 41.7 pCi/g. The total activity of uranium in the soil placed in BA4 is 0.989 Curies.

Upon completing the placement of contaminated soil, each of the trenches was covered with a minimum of 4 feet of soil and vegetation was established over the soil cover.

License Condition 23(a) states, “The licensee shall periodically monitor the disposal area for subsidence, erosion, and status of the vegetative cover for at least 5 years, and promptly repair any problems noted.” The disposal area was monitored for well over 5 years, and even 18 years after the cover was placed and vegetated, there is no evidence of subsidence or erosion. The vegetative cover remains effective, covering 100% of the area with a dense stand of grass.

License Condition 23(b) states, “Notification shall be placed on the land title to declare that uranium-contaminated soil has been buried on the site and to record the volume, average uranium concentration, and exact location of the buried soil. This notification is not to be considered a restriction on the sale or future use of the site. Furthermore, cairns (permanent markers) placed at the corners of the disposal cell shall be maintained.”

Cairns, consisting of concrete cylinders with brass plates, surrounded by steel bollards, were placed at the four corners of BA4. The brass discs were engraved with the coordinates of the corners, the words “Radioactive Disposal Area”, and lines indicating the boundaries of BA4. The location of BA4, the total volume of soil, and the total activity of uranium (rather than the average uranium concentration) was recorded on the property deed filed with the County Recorder on September 19, 2002. Attachment 3 to this license amendment request includes a copy of the notification that was placed in the deed and a picture of the cairn that was installed at the southeast corner of BA4.

As described above, all work authorized by or required by License Condition 23 has been completed. The NRC’s statement that the notification in the deed “is not to be considered a restriction on the sale or future use of the site” further supports EPM’s recommendation for the unrestricted release of this portion of Subarea N.

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<sup>8</sup> Cimarron Corporation, December 2001

Mr. Ken Kalman, et. al.  
Redefinition of the Licensed Area  
November 22, 2019



License Conditions 25, 28, 29, and 30

License Condition 25 released Subareas A through E for unrestricted use. License Condition 28 released Subareas J and O for unrestricted use. License Condition 29 released for unrestricted use Subareas H, L, and M. License Condition 30 released Subarea K for unrestricted use. For all of these Subareas, the NRC stated in those four license conditions, "It is no longer licensed by NRC."

If the NRC approves the re-designation of the licensed area as proposed herein these four license conditions should be deleted. Portions of several of these former Subareas will be re-incorporated into the licensed site, and portions will remain released for unrestricted use. The former Subarea designations no longer serve any purpose.

Proposed Amendments to License SNM-928

EPM requests that License Condition 9 be amended to designate as the "Authorized Place of Use:" as the area depicted in Figure 3 of the November 22, 2019 license amendment request." (or equivalent language).

EPM requests that License Conditions 23, 25, 28, 29, and 30 be deleted from License SNM-928.

Proposed Revisions to the Decommissioning Plan

Should the NRC amend the license in accordance with this license amendment request, Section 6.3 of the DP, which requested redefinition of the licensed site, will be deleted. Section 6.5 of the DP, which requested amended language for License Condition 23 will also be deleted. These changes will be made to the DP in the final revision of *Facility Decommissioning Plan – Rev 1*.

Please contact me at (405) 642-5152 or e-mail me at [jlux@envpm.com](mailto:jlux@envpm.com) if you have questions or desire clarification. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Jeff Lux". The signature is written in a cursive, flowing style.

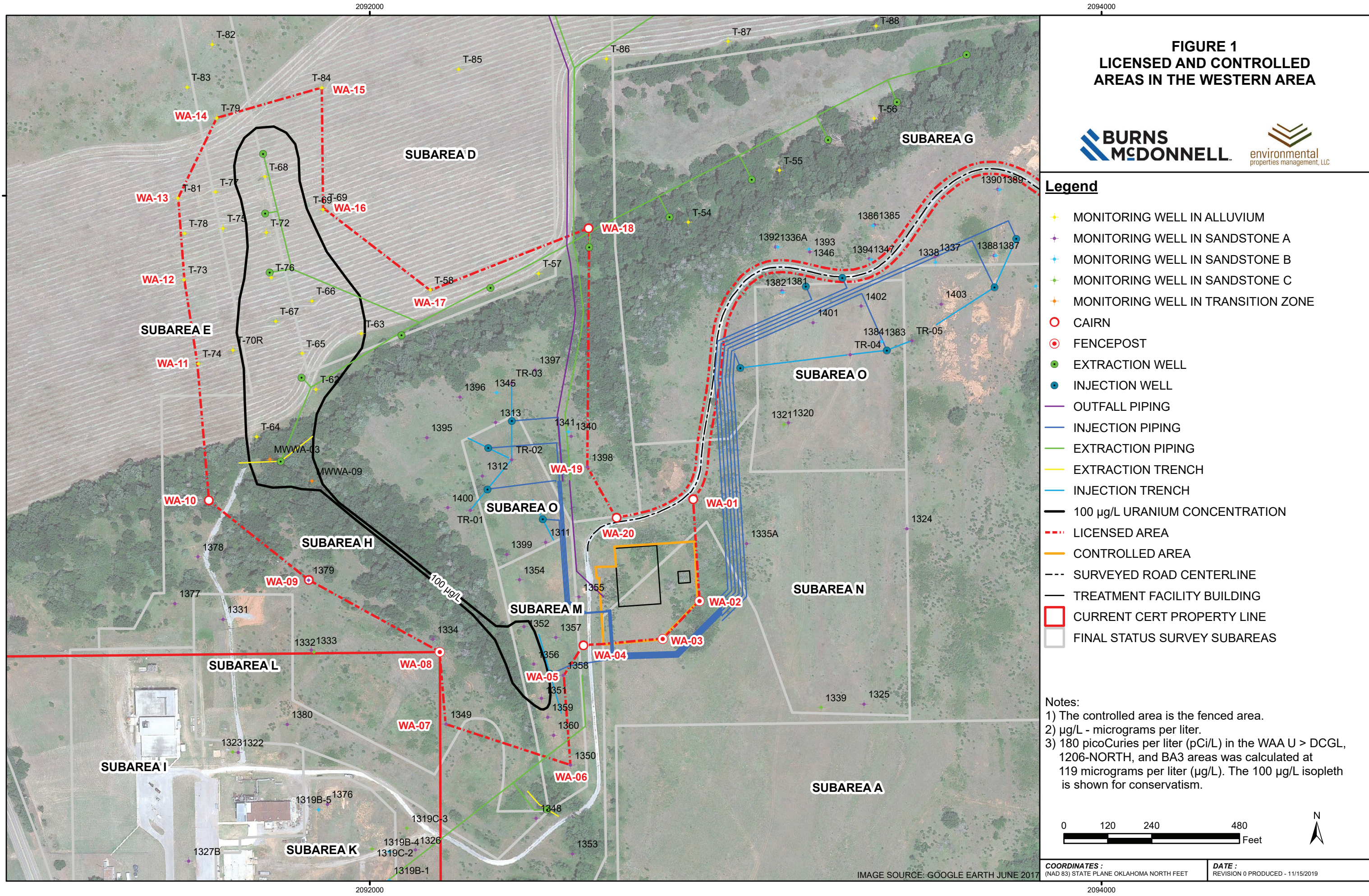
Jeff Lux, P.E.  
Project Manager

Cc: Robert Evans, NRC Region IV  
Paul Davis, DEQ  
Michael Broderick, DEQ  
NRC Public Document Room (electronic copy)

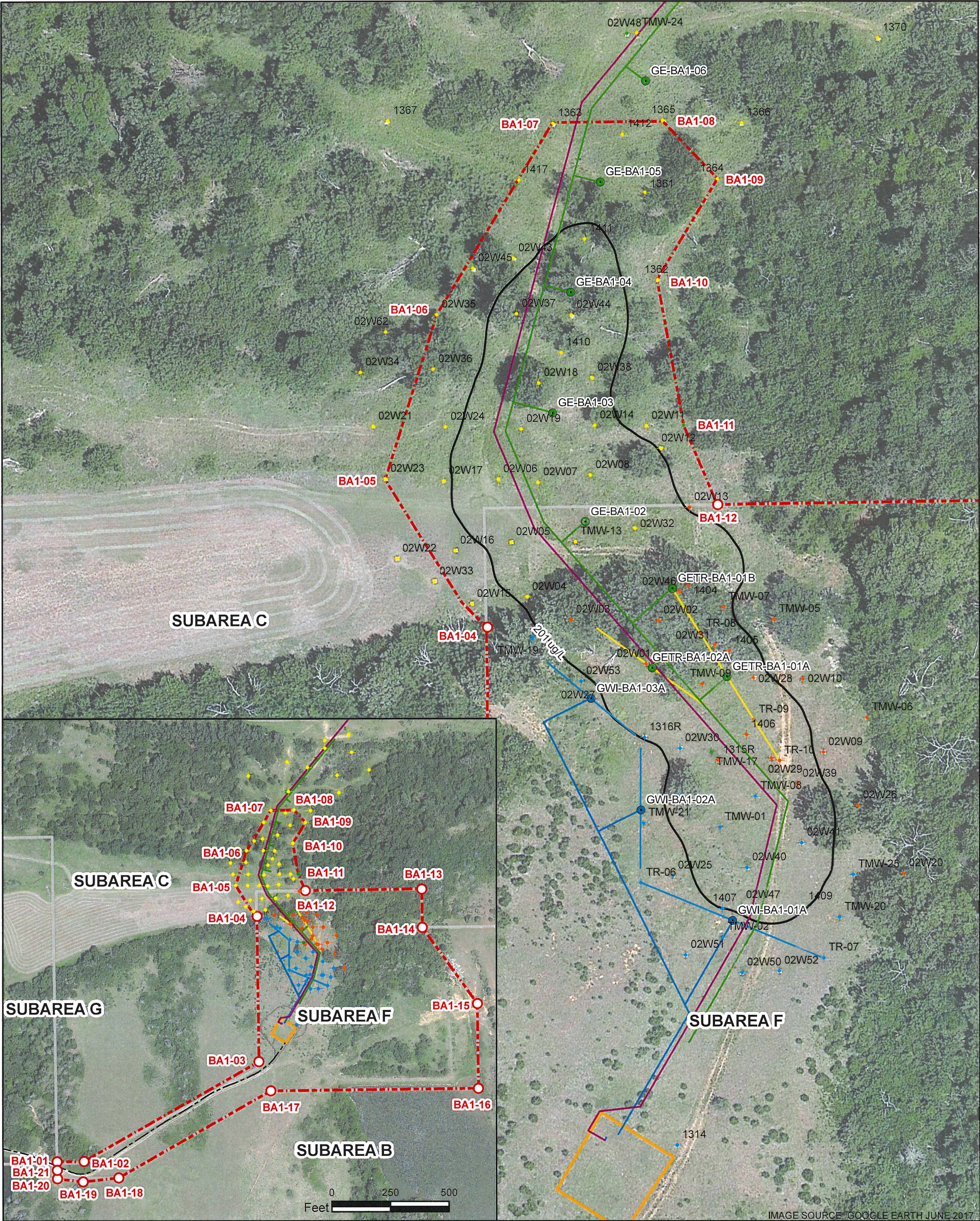
ATTACHMENT 1  
FIGURES 1 THROUGH 3



Path: Z:\Clients\ENSCERT\ ClientInfo\Sites\Database\Geospatial\Maps & Dvgs\ArcGIS\BMD\ Files\Arcdocs\2019\2019 Cairns Placement\Figure 1\_ Western Area Licensed and Controlled Areas with Cairns.mxd  
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**Legend**

- MONITORING WELL IN ALLUVIUM
- MONITORING WELL IN SANDSTONE B
- MONITORING WELL IN SANDSTONE C
- MONITORING WELL IN TRANSITION ZONE
- CAIRN
- EXTRACTION WELL
- INJECTION WELL
- INJECTION PIPING
- EXTRACTION PIPING
- EXTRACTION TRENCH
- INJECTION TRENCH
- OUTFALL PIPING
- SURVEYED ROAD CENTERLINE
- LICENSED AREA
- CONTROLLED AREA
- 201 ug/L URANIUM ISOPLETH
- FINAL STATUS SURVEY SUBAREAS

Notes:  
1) The controlled area is the fenced area.  
2) pCi/L - picoCuries per liter.  
3) Isopleths are drawn based on "representative" uranium concentrations, expressed in micrograms per liter (µg/L). With a conservatively estimated value of 1.3% for U-235 enrichment, the 201 µg/L isopleth, as shown, represents the 180 pCi/L isopleth.

0 50 100 200 Feet



COORDINATES :  
(NAD 83) STATE PLANE OKLAHOMA NORTH FEET

DATE :  
REVISION 0 PRODUCED - 11/14/2019

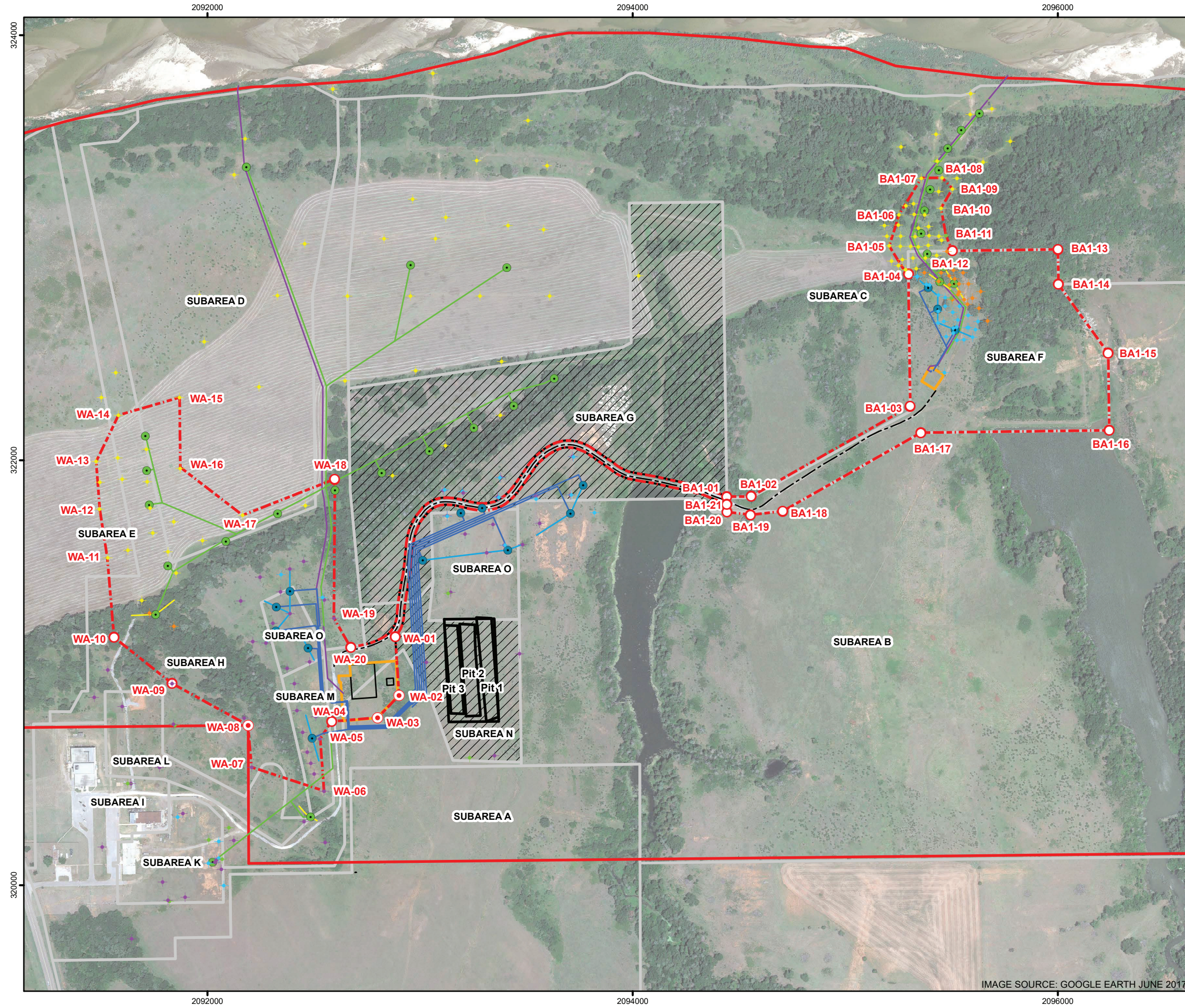
**FIGURE 2**  
**LICENSED AND CONTROLLED**  
**AREAS IN BURIAL AREA #1**

**BURNS**  
**McDONNELL**

**environmental**  
properties management, LLC



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**FIGURE 3**  
**LICENSED AND CONTROLLED**  
**AREAS - SITE WIDE**



- Legend**
- MONITORING WELL IN ALLUVIUM
  - MONITORING WELL IN SANDSTONE A
  - MONITORING WELL IN SANDSTONE B
  - MONITORING WELL IN SANDSTONE C
  - MONITORING WELL IN TRANSITION ZONE
  - CAIRN
  - FENCEPOST
  - EXTRACTION WELL
  - INJECTION WELL
  - EXTRACTION TRENCH
  - INJECTION TRENCH
  - INJECTION PIPING
  - EXTRACTION PIPING
  - OUTFALL PIPING
  - LICENSED AREA
  - CONTROLLED AREA
  - TREATMENT FACILITY BUILDING
  - SURVEYED ROAD CENTERLINE
  - BURIAL AREA 4 (BA4)
  - CURRENT CERT PROPERTY LINE
  - FINAL STATUS SURVEY SUBAREAS
  - MODIFIED SUBAREAS G & N

Notes:  
1) The controlled area is the fenced area.  
2) Hatched areas denote parts of subareas G & N that do not fall within the licensed areas.



**COORDINATES :**  
(NAD 83) STATE PLANE OKLAHOMA NORTH FEET

**DATE :**  
REVISION 0 PRODUCED - 11/15/2019



ATTACHMENT 2  
LOCATIONS OF CORNERS OF  
PROPOSED LICENSED AREA

**Cimarron Environmental Response Trust**  
**Attachment 2**  
**Locations of Corners of Proposed Licensed Area**

<b>Location</b>	<b>Marker</b>	<b>Easting (feet)</b>	<b>Northing (feet)</b>
WA-01	Cairn	2,092,884	321,170
WA-02	Fencepost	2,092,901	320,893
WA-03	Fencepost	2,092,800	320,788
WA-04	Cairn	2,092,584	320,771
WA-05	Monitor Well 1358	2,092,528	320,690
WA-06	Monitor Well 1350	2,092,549	320,444
WA-07	Cairn (formerly 1349)	2,092,208	320,556
WA-08	Fencepost	2,092,191	320,753
WA-09	Monitor Well 1379	2,091,833	320,950
WA-10	Cairn	2,091,560	321,167
WA-11	Monitor Well T-74	2,091,531	321,541
WA-12	Monitor Well T-73	2,091,492	321,771
WA-13	Monitor Well T-81	2,091,476	321,994
WA-14	Monitor Well T-79	2,091,582	322,213
WA-15	Monitor Well T-84	2,091,869	322,295
WA-16	Monitor Well T-69	2,091,872	321,962
WA-17	Monitor Well T-58	2,092,165	321,742
WA-18	Cairn	2,092,598	321,911
WA-19	Monitor Well 1398	2,092,595	321,258
WA-20	Cairn	2,092,675	321,119
BA1-01	Cairn	2,094,443	321,829
BA1-02	Cairn	2,094,558	321,830
BA1-03	Cairn	2,095,306	322,230
BA1-04	Cairn	2,095,298	322,876
BA1-05	Monitor Well 02W23	2,095,207	323,008
BA1-06	Monitor Well 02W35	2,095,253	323,156
BA1-07	Monitor Well 1363	2,095,358	323,328
BA1-08	Monitor Well 1365	2,095,456	323,330
BA1-09	Monitor Well 1364	2,095,505	323,277
BA1-10	Monitor Well 1362	2,095,451	323,187
BA1-11	Monitor Well TMW-23	2,095,474	323,056
BA1-12	Cairn	2,095,504	322,985
BA1-13	Cairn	2,096,000	322,992
BA1-14	Cairn	2,096,003	322,828
BA1-15	Cairn	2,096,237	322,503
BA1-16	Cairn	2,096,242	322,141
BA1-17	Cairn	2,095,356	322,130
BA1-18	Cairn	2,094,706	321,760
BA1-19	Cairn	2,094,554	321,743
BA1-20	Cairn	2,094,444	321,757
BA1-21	Cairn	2,094,443	321,793

Note: Coordinates are NA 83 State Plane Oklahoma North feet

ATTACHMENT 3  
BURIAL AREA #4  
ADDENDUM TO WARRANTY DEED  
AND  
IMAGE OF DISPOSAL AREA CAIRN

X After Recording, Return to:  
Cimarron Corporation  
Attn: Real Estate Dept. MT-1106  
P.O. Box 25861  
Oklahoma City, OK 73125



STATE OF OKLAHOMA  
LOGAN COUNTY SS:  
FILED FOR RECORD ON

2002 SEP 19 AM 10:44

MARY LOU ORNDORFF  
COUNTY CLERK

**ADDENDUM TO WARRANTY DEED  
NOTICE OF CONTAMINATED SOIL (CONTAINED)**

KNOW ALL PERSONS BY THESE PRESENTS:

THAT, for the purposes of complying with the terms and conditions of that certain license known as SNM-928 (docket number 070-00925, Amendment 17) issued by the U. S. Nuclear Regulatory Commission to Cimarron Corporation, an Oklahoma corporation, notice is hereby provided that uranium-contaminated soil has been buried at the following location:

A piece, parcel, or tract of land located in the NW 1/4 of Section 12, Township 16 North, Range 4 West of the Indian Base and Meridian, Logan County, State of Oklahoma more particularly described as follows:

Beginning at a point 1,701.62 feet east and 682.23 feet north of the SW corner thereof

THENCE North 89 degrees 48 minutes 51 seconds East for a distance of 238.41 feet;

THENCE North 02 degrees 20 minutes 27 seconds West for a distance of 484.32 feet;

THENCE South 89 degrees 44 minutes 36 seconds West for a distance of 233.15 feet;

THENCE South 01 degrees 43 minutes 11 seconds East for a distance of 483.87 feet to the Point of Beginning.

Together with and subject to covenants, easements, and restrictions or records.

Said property contains 2.62 acres more or less.

The uranium-contaminated soil is buried in a containment cell at the following coordinates:

NW y 11145.87 N x 11718.84 SW y 10662.19 N x 11733.48  
SE y 10663.04 x 11 971.91 NE y 11146.83 x 11952.29.

The total volume of uranium-contaminated soil in the containment cell is 452,186 cubic feet, and the total quantity of uranium is 0.98 curies. Markers are placed at the containment site.

The site owner and operator is Cimarron Corporation, P.O. Box 25861, Oklahoma City, OK 73125.

**CIMARRON CORPORATION**



By: \_\_\_\_\_

S. Michael Logan, Vice President

STATE OF OKLAHOMA )

COUNTY OF OKLAHOMA )





RADIOACTIVE DISPOSAL AREA  
OKLAHOMA Y 10,663.04 N  
GRID X 11,971.91 E

The image shows a circular metal marker, likely made of steel, which is heavily rusted and weathered. It is embedded in a larger, circular concrete base. The marker features a diagram of a coordinate grid with a vertical arrow pointing upwards and a horizontal arrow pointing to the left, forming an 'L' shape. The text on the marker is painted in a light color, possibly white or yellow, and is arranged in four lines. The first line reads 'RADIOACTIVE DISPOSAL AREA', the second line reads 'OKLAHOMA Y 10,663.04 N', the third line reads 'GRID', and the fourth line reads 'X 11,971.91 E'. The concrete base is a light brown color with some darker spots. The entire assembly is surrounded by green grass and some small plants.