



# Silver King Mines, Inc.

## MORTON RANCH PROJECT

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DOCKET NUMBER **PR-19,20,21 et al**  
PROPOSED RULE **(50 FR 13797) (83)**

DOCKETED  
USNRC

July 30, 1985

'85 AUG -2 A11:27

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Docketing and Service Branch

RE: NRC's Proposed Well Logging Rules (10 CFR Part 39)

Dear Mr. Secretary:

The NRC's proposed rules for well logging state in fact that they are applicable to licensed sources, their adoption could require that uranium drill hole logging be done with licensed sources into a cased hole. In particular to the uranium industry are proposed rules 39.41 and 39.51, which phase-out sealed sources that do not meet the rules' criteria and require that drill holes must be cased in order to be logged. Drill hole logging is the primary uranium exploration technique and any additional exploration costs will tend to minimize future exploration efforts. Drill holes are mainly uncased in order to minimize costs and to comply with regulations for their immediate plugging/sealing and reclamation. Accordingly, uranium development drilling (with logging) commonly has 9 to 25 holes per acre and if these holes were cased, they would tremendously impact future use of a mining area.

These proposed rules may offer another degree of environmental protection, but their associated costs appear to greatly negate any benefits to mankind. It is proposed that the U. S. NRC better define the industries that it wishes these rules to control and then perform a comprehensive economic analysis to justify the need for these rules. The additional costs and time frames associated with their compliance also need complete evaluation.

D210  
Add Bruce Carnice, 39655  
Steven McQuinn, 118055  
William Almstad, 96004-0103

8508060161 850802  
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U. S. Nuclear Regulatory Commission  
July 30, 1985  
Page Two

Thank you for the opportunity to respond. I trust these brief comments will stimulate a more comprehensive evaluation of the proposed rules.

Very truly yours,



C. E. Wolff, Manager  
Wyoming/South Dakota  
Mineral Rights Projects

CEW:meo

cc: S. B. Clifford  
M. R. Central File  
4007.6

DOCKET NUMBER

PROPOSED RULE

PR-19,20,21 et al

(50 FR 13797)

(84)

Shot Point

SERVICE, Inc.

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TELEPHONE: (713) 461-8166

DOCKETED  
USNRC

July 31, 1985

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Secretary of The Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing & Service Branch

We are writing to protest the proposed regulation (Federal Register, Vol. 50, No. 67, pages 13797 - 39:51, Use of a sealed source in a well without surface casing designed to protect fresh water aquifer zones, unless procedure for protecting these zones are specifically approved by the commission.)

We do core drilling for every kind of minerals, and have never lost a nuclear source in a hole. Our holes go to a maximum depth of 2,000 feet. If your proposed regulation is referring to the deeper oil wells which always have surface pipe in them, then the regulation, should be more specific.

If the above regulation is passed, it would not only make the cost of mineral exploration prohibitive, but it would also distort, change, and reduce the information we need from the logs.

Before this regulation is passed, we urge that further study be done on the repercussions to the exploration industry as a whole.

Sincerely,

*Buel Martin*

Buel Martin  
President & General Manager  
Shot Point Service, Inc.

BM/mb

DS10  
add Bruce Carver, 396 SS  
Steven McGuire, 1130 SS  
William Armstrong, 9604 MNPB

AUG - 5 1985

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