

Utah Division of Radiation Control
Draft Stipulation and Consent Order: Chloroform Plume Remediation

Statement of Basis

For a
Uranium Milling Facility
At White Mesa, South of Blanding, Utah

Owned and Operated by
Energy Fuels Resources (USA) Inc. (formerly Denison Mines (USA) Corp.)
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December, 2014

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Purpose

The purpose of this Statement of Basis (“SOB”) is to describe the technical and regulatory basis for the proposed Stipulation and Consent Order (“SCO”) and Groundwater Corrective Action Plan (“GCAP”) concerning the chloroform plume remediation for the Energy Fuels Resources (USA) Inc. (formerly Denison Mines (USA) Corp.) uranium mill facility located about six miles south of Blanding, Utah on the White Mesa in Sections 28, 29, 32 and 33, Township 37 South, Range 22 East, Salt Lake Base and Meridian, San Juan County, Utah.

Introduction and History

The White Mesa uranium mill was constructed in 1979-1980 and licensed under federal regulations by the Nuclear Regulatory Commission and Source Material License SUA-1358. Initially, the facility consisted of the Mill works and one tailings disposal cell, Cell 2, which was completed in May, 1980 (2/82 D'Appolonia Consulting Engineers Report, p. 3-1). In June, 1981 construction of a wastewater storage/evaporation pond, Cell 1, was completed (ibid., p. 1-1). Construction of a second tailings disposal cell, Cell 3, was completed in September, 1982 (3/83 Energy Fuels Nuclear Report, pp. 1-2¹). Tailings disposal Cell 4A was completed in January, 1990 (5/28/99 IUC Groundwater Information Report, p. A-11).

In August, 2004, the Utah Division of Radiation Control (“DRC”) received Agreement State authority from the U.S. Nuclear Regulatory Commission for direct regulation of uranium / thorium mill tailings. On September 17, 2008, Tailings disposal Cell 4A was approved to receive tailings and wastewater (DRC 2008). On January 27, 2011 Tailings disposal Cell 4B was completed and approved for use (DRC 2011).

In 2006, the International Uranium (USA) Corporation (“IUC”) informed the Utah Water Quality Board that they changed their name to Denison Mines (USA) Corp. (“DUSA”) as a result of a merger between its parent company, International Uranium Corporation and Denison Mines Inc. As a result of the merger, International Uranium Corporation changed its name to Denison Mines Corp. In a May 25, 2012, letter DUSA informed the DRC that Energy Fuels Inc. had acquired all DUSA properties owned in the United States, and requested an indirect change of control of the License from Denison Mines Corp. to Energy Fuels Inc. In a letter dated June 27, 2012, the DRC approved an indirect transfer of control of the company. Later, in an August 3, 2012, DUSA letter, the company requested a license amendment to change the company name to Energy Fuels Resources (USA) Inc (“EFR”). This name change was authorized by the DRC on August 24, 2012, with issuance of both an amended Radioactive Materials License (Amendment No. 5), and a modified Ground Water Discharge Permit.

Groundwater at White Mesa is primarily found in two aquifers: 1) a shallow unconfined or perched aquifer, and 2) a deep underlying confined aquifer. The shallow aquifer is found almost entirely in the Cretaceous-age Burro Canyon Formation, where groundwater is perched on the top of the underlying Jurassic-age Brushy Basin Member of the Morrison Formation. The Brushy Basin Member is about 200-400 feet thick and consists of low permeability shale and mudstone in the Blanding area (Hintze, p. 200). At White Mesa, the Brushy Basin member is about 250 feet thick (7/94 Titan Environmental Report, Fig. 1.2) and the geologic contact between these two formations is found at a depth of about 78 to 149 feet below ground surface (“bgs”, see 9/6/02 IUC map submittal). The water table in the perched aquifer is found at shallow depths and discharges to seeps and springs along the margin of White Mesa. Upgradient to the mill site, the perched aquifer is used for drinking water, stock watering, and irrigation.

¹ Energy Fuels Nuclear was a former co-owner of White Mesa Uranium Mill facility near Blanding.

Downgradient of the mill site, the perched aquifer supports stock watering and some wildlife habitat.

The deep confined aquifer under White Mesa is found in the Entrada and underlying Navajo Sandstones. EFR estimates the top of the Entrada Sandstone at the site is found at a depth of more than 1,150 bgs (7/94 Titan Environmental Report, Fig 2.3). This deep aquifer is hydraulically isolated from the shallow perched aquifer by at least two (2) shale members of the Morrison Formation, including the Brushy Basin (~295 feet thick) and the Recapture (~120 feet thick) Members (ibid., 1.2). Other formations are also found between the perched and deep confined aquifers that also include many layers of thin shale interbeds that contribute to the hydraulic isolation of these two groundwater systems, including: the Morrison Formation Westwater Canyon (~120 feet thick); Salt Wash (~120 feet thick) Members; and the Summerville Formation (~100 feet thick) [ibid]. Artesian groundwater conditions found in the deep Entrada/Navajo Sandstone aquifer also reinforce this concept of hydraulic isolation from the shallow perched system. The deep confined aquifer is the primary regional drinking water supply and must be protected from pollution sources. The Ute Mountain Ute Tribe community is located a few miles south of the mill site and depends on this deep confined aquifer for drinking water.

In May, 1999 EFR and DRC commenced a split sampling program for groundwater monitor wells at the White Mesa facility. This program was comprehensive in that it included sampling of all monitoring wells at the facility completed in the shallow aquifer (not just tailings cell POC wells), and sampled for numerous groundwater contaminants, including: heavy metals, nutrients, general chemistry analytes, radiologics and volatile organic compounds (“VOC”).

During the May, 1999 split sampling event, excess chloroform concentration was discovered in monitoring well MW-4 found along the eastern margin of the mill site. Because these chloroform concentrations were above the State Groundwater Quality Standard (“GWQS”), the DRC initiated enforcement action against EFR on August 23, 1999 thru issuance of a Groundwater Corrective Action Order, which required a completion of: 1) a contaminant investigation report to define and bound the contaminant plume, and 2) a groundwater corrective action plan to clean up the contamination (DRC 1999). Repeated groundwater sampling by both EFR and DRC have confirmed the presence of chloroform in concentrations that exceed the State GWQS along the eastern margin of the facility in wells that are generally upgradient or cross-gradient from the tailings cells. Also, three other VOC contaminants have been detected in some monitor wells and a few of these wells have also exceeded their respective GWQS, including; carbon tetrachloride (a co-contaminant of chloroform), dichloromethane and chloromethane (degradation daughter products of chloroform).

Based on these investigations, the contamination has been attributed to the Mill operation by a former owner/operator of a temporary laboratory facility that was located at the site prior to and during construction of the Mill, and from septic drain fields that were used by the former owner/operator for laboratory and sanitary wastes prior to construction of

the Mill's tailings cells². Since the discovery of chloroform contamination, 34 monitor wells have been installed at the site to define the horizontal dimensions of the chloroform contaminant plume. After sampling and analysis of these monitor wells, groundwater studies appear to have defined the eastern and southern boundaries of the chloroform plume, as well as the north and west boundaries. Five of the wells are currently being pumped by EFR to capture and control the chloroform contamination (MW-4, MW-26, TW4-19, TW4-20 and TW4-4). Also, from April 2002 to the present, more than 35 quarterly groundwater monitoring reports have been submitted to DRC to update the status of the chloroform contamination (see Attachment 1 below). Among these monitoring reports, beginning in 1999 to present, there have been several documents from both DRC and EFR concerning progress of the chloroform contamination investigation (see Table 1 below).

Among these documents is the DUSA Preliminary Contamination Investigation Report (November 2007) ["CI"] and Preliminary Corrective Action Plan (August 2007) ["CAP"] reports. Both of these DUSA submittals propose application of pump and treat remediation technology as a means to resolve the chloroform contaminant plume.

The DRC has reviewed the August 2007 proposed CAP and has determined that it does not completely meet State groundwater corrective action requirements to remediate the chloroform contamination in the shallow aquifer below the White Mesa Uranium Mill ("Facility"). Instead of requesting additional information, the Director of the Division of Radiation Control ("Director") will expedite the process and issue a SCO that includes a Groundwater Corrective Action Plan ("GCAP") to set cleanup objectives, cleanup performance standards and monitoring/ reporting requirements to remediate the chloroform plume in the shallow aquifer below the Facility. The basis for the GCAP remediation requirements are described below.

Summary of Stipulation and Consent Order

The chloroform investigation and CAP at White Mesa were performed in response to an enforcement action (August 23, 1999 Notice of Violation and Groundwater Corrective Action Order, Docket No. UGW20-01), therefore the approval of the chloroform GCAP falls under the realm of an enforcement action. As a means of resolving the open NOV and Order, the Director has elected to formulate the content of the GCAP, as outlined below.

The content of the SCO has been prepared as a means of providing assurance that EFR successfully remediates the chloroform contamination at White Mesa in an effective and timely manner.

One critical item in the SCO is that a Corrective Action Comprehensive Monitoring ("CACME") Report is required to be submitted by EFR by March 31, 2017 (for Director

² See August 20, 2007 DUSA CAP, pp. 18-19.

review/approval) and every two years thereafter. The CACME reports have several purposes, including requiring EFR to:

1. Summarize performance of the chloroform corrective action (aquifer pump and treat system) since 2003 in restoring local groundwater quality;
2. Re-evaluate any/all key assumptions/bases for the corrective action project. One example includes the type, number and location of historic chloroform pollution sources; and
3. Calculate the future volume of groundwater that will need to be removed and length of time the pump and treat system operation will be needed to meet the performance requirements under the new GCAP; Identify any needed changes to the corrective action project to reduce the time required to achieve the performance standards now mandated by the new GCAP.

The Director believes it is possible to prepare this report because of at least 11 years of chloroform pump and treat system operation at EFR and the attending groundwater monitoring information reported to date. Every two years the Director will evaluate the CACME report to determine whether the GCAP continues to be protective of public health and the environment. If based on these reviews, the Director determines that the GCAP is not protective of public health and the environment, the Director may require changes to the GCAP. The DRC will also continue to review quarterly Chloroform monitoring reports to determine if other actions are needed.

While the initial enforcement action did not impose any administrative penalty, the SCO provides for future penalties (economic incentives) for EFR to comply with the terms of the GCAP. The Director has determined this approach to be appropriate for the situation, while at the same time providing protection of public health and the environment.

Upon completion of the public comment period, and the signing of the SCO by both parties, the August 23, 1999 NOV and Order action will be considered fully resolved.

Summary and Description of GCAP Content/Requirements

GCAP Groundwater Corrective Action Objectives (Part I)

Several corrective action (“CA”) objectives have been determined necessary by the Director in order to ensure compliance with the requirements of UAC R317-6-6.15 (E)(2) to -(5). These have been incorporated in Part I of the GCAP, and include:

1. Duty to Complete Corrective Action, Part I.A – The CA method currently approved by the Director is the application of pump and treat technology. Any other remediation technology must have prior written approval by the Director. Also, this section mandates that EFR permanently restore shallow aquifer groundwater quality at the White Mesa facility to concentrations equal to or

below the Ground Water CA Limits set in Part I.C, before termination of the Radioactive Materials License issued by the Utah Division of Radiation Control.

2. Definition of Well Purpose and Identity, Part I.B – The wells used to monitor and remediate the chloroform impacted groundwater will be organized into three groups or functions as: Pumping Wells, Performance Monitoring (“PM”) Wells, and Compliance Monitoring (“CM”) Wells. Each is described below:
 - A. **Pumping Wells** – Wells used to extract chloroform polluted groundwater from the shallow aquifer at White Mesa. These wells are or will be in strategic locations to create a hydraulic capture zone to control and remove the chloroform contamination. Generally these wells will be directly downgradient of the sources of chloroform contamination. A capture zone refers to the three-dimensional region that contributes the ground water extracted by one or more wells or drains (EPA 2008). Currently, EFR operates five chloroform pumping wells at the facility: MW-4, MW-26, TW4-19, TW4-20, and TW4-4. In addition, there are three nitrate pumping wells at the facility: TW4-22, TW4-24, and TW4-25 that will also aid in the remediation of the chloroform plume. Within 120 days of approval of the GCAP EFR will convert existing monitor wells TW4-1, TW4-2, TW4-11 and TW4-21 into pumping wells (see discussion on Part I.C below). In addition, within 120 days of approval of the GCAP, EFR will install and make operational a new pumping well, TW4-37, located between pumping wells TW4-20 and TW4-22).
 - B. **Performance Monitoring (PM) Wells** – Wells that are or will be located within the chloroform contaminant plume, as circumscribed by the shallow aquifer’s 70 µg/l chloroform isoconcentration boundary (i.e., Utah Ground Water Quality Standard [“GWQS”]). Typically PM Wells will be found hydraulically downgradient of chloroform pollution sources and upgradient of Compliance Monitoring Wells. When Pumping Wells are successful in containing and controlling the contaminant plume, chloroform concentrations in the PM Wells should generally decrease over time. The draft GCAP defines five wells as PM wells, see GCAP, Table 1.
 - C. **Compliance Monitoring (CM) Wells** – Wells located outside the contaminant plume that have chloroform concentrations less than the State GWQS (70 µg/L for chloroform). Normally they are down or cross gradient from the plume. Non-compliance occurs when these wells demonstrate chloroform concentrations in excess of 70 µg/l. The draft GCAP defines 20 wells as CM wells, see GCAP, Table 1.

In effect, the three well groups allow the Director to evaluate performance of groundwater remediation over time. When a contaminant source (at or near the ground surface) has not been physically removed, and the plume is not fully controlled, the plume boundary (e.g., 70 µg/l chloroform isoconcentration line) will increase in size in a downgradient (hydraulic) direction over time³. In these

³ For contaminant plume behavior, see Freeze and Cherry, Chapter 9, or Domenico and Shwartz, Chapter 16.

cases, the contamination will form a continuous zone between the source location(s) and impacted areas farther downstream. To protect public health and the environment under these circumstances and to re-establish the physical location of the outer margin or boundary of the plume, the Director must mandate that new CM Wells be added in a downgradient direction (ahead/outside of the 70 µg/l chloroform isoconcentration).

Conversely, if this contamination is well controlled, the area circumscribed by plume boundary will decrease with time. Theoretically, at some future date, all points in the shallow aquifer near the former source will exhibit groundwater concentrations below the State GWQS.

When a contaminant source (at or near the ground surface) has been physically removed, and no longer contributes contamination to the aquifer, the shape of the plume will exhibit a “slug” behavior, where a zone of uncontaminated or less contaminated water⁴ will generally exist between the source and the plume’s upgradient boundary. Under these conditions, when remediation is effective, the area (or volume) of the “slug” shaped plume will decrease over time (as it travels in a downgradient direction). Theoretically, over time the “slug” will decrease in size as contaminant mass is removed. Public health and the environment are protected when groundwater concentrations in the “slug” fall below State GWQS, before the mass leaves property owned by EFR.

These well groupings/functions have been created, and all monitoring requirements provided in the GCAP as a means to allow the Director to determine the effectiveness of the EFR remediation.

3. Duty to Convert Certain Existing Monitoring Wells to Pumping Wells, Part I.C – In order to accelerate the remediation of the chloroform contamination, EFR will convert existing monitor wells TW4-1, TW4-2, TW4-11 and TW4-21 into pumping wells.
4. Duty to Install Additional New Pumping Well, Part I.D - In order to accelerate the remediation of the chloroform contamination, EFR will install a new pumping well, TW4-37, between pumping wells TW4-20 and TW4-22.
5. Duty to Protect, Operate and Maintain All Monitoring and Pumping Wells, Part I.E – In order for the CA to be effective, EFR will need to properly protect, operate and maintain the Pumping Wells, PM Wells and CM wells in the system. It is also important to provide the Director the ability to modify the approved CA, as needed, in order to ensure and verify the chloroform plume is controlled and contained on property owned and controlled by EFR. To this end, after review of EFR groundwater flow and quality information, the Director may require an addition of a new well (Pumping, PM or CM) to the system, or re-designate an existing well to a different function (Parts I.I, I.J and II.J).

⁴ In terms of public health, “uncontaminated” groundwater would exhibit concentrations that are at or below State GWQS for a given contaminant. In the case of chloroform, “uncontaminated” would mean concentrations ≤ 70 µg/l.

6. Duty to Provide Adequate Compliance Monitoring Well Network, Part I.F – The purpose of this objective is to reinforce EFR’s obligation to maintain CM Wells at all times, in sufficient numbers and locations to provide early warning of arrival of the chloroform plume. This will allow the Director to be able to confirm for the public that the chloroform plume has and is being maintained on property owned by EFR.
- A. Determination of Groundwater Corrective Action Limits (“GCALs”), Part I.G – the GCALs established in the GCAP are based on State GWQS, as authorized by UAC R317-6-6.15(F)(1)⁵. The Director has determined there are at least six (6) pollutants in the chloroform plume, that need management and CA, as outlined below.

Contaminants Assigned GCALs:

Chloroform –the contamination has been attributed to the Mill operation by a former owner/operator of a temporary laboratory facility that was located at the site prior to and during construction of the Mill, and from septic drain fields that were used by the former owner/operator for laboratory and sanitary wastes prior to construction of the Mill’s tailings cells. Of the five GCAL (Table 2) contaminants, chloroform has the highest detected concentrations, and has been detected in most of the wells in the current chloroform monitoring network.

Chloromethane – Is a daughter product of chloroform degradation under reducing groundwater conditions (Pankow and Cherry). Although chloromethane has been detected in some of the chloroform monitoring wells at the site, it has not yet exceeded its GCAL (30 µg/L).

Carbon Tetrachloride – Is a common co-contaminant in virgin chloroform product (DRC June 2001). Carbon tetrachloride has been detected in shallow groundwater and has exceeded its GCAL (5 µg/L) in some of the monitor wells at the site.

Dichloromethane (also known as Methylene Chloride) – Is also a daughter product of chloroform when degraded under reducing groundwater conditions (IUC November 2001). Dichloromethane has been detected and has exceeded its GCAL (5 µg/L) in some of the monitor wells at the site.

Nitrate + Nitrite (as N) – There is a correlation between chloroform and nitrate which is consistent with the leach-field origin (IUC 2001).

Contaminant Not Assigned a GCAL:

Chloride – Chloride does not have a GCAL in the GCAP (Table 2) because there is no corresponding GWQS in the Utah rules (R317-6-6.2, Table 1). However, it also needs to be monitored because chloride is associated with the source of the chloroform plume. For this reason, it is required to be sampled pursuant to Part III.A.1.

⁵ This rule, in turn, refers to the Utah GWQS in UAC R317-6-2, Table 1.

7. Duty to Perform Corrective Action, Part I.H – This section mandates that EFR does not have the authority to unilaterally cease or desist any activity under the GCAP without prior written Director approval, and completion of public participation when required under UAC R317-6-6.15.E.
8. Director Modification of Groundwater CA Plan Requirements, Part I.I – The purpose of this section is to give the Director the ability to modify the CA system and GCAP requirements to address changing contaminant plume and groundwater conditions, and ensure timely and definitive aquifer remediation.
9. Two-Year Review of GCAP, Part I.J – Every two years EFR will submit the CACME Report. This CACME Report will allow the Director to evaluate that the GCAP continues to be protective of public health and the environment. If the Director determines that the GCAP is not protective of public health or the environment, the Director may change current designation of wells in Part I.A Tables 1A or 1B, or require additional wells be installed. Conversely, if the groundwater remediation strategy improves local groundwater quality, the Director may authorize conversion of Pumping Wells to Performance Monitoring Wells.

Groundwater Corrective Action Performance Standards (Part II)

The purpose of the CA performance standards are to assure that the shallow aquifer below the Facility is properly remediated in a timely manner, and that the GCAP activities comply with the requirements of UAC R317-6-6.15(E)(2) to (5). The Director has determined the minimum requirements need to include the following:

1. Chloroform Plume Definition, Part II.A – The chloroform contaminant plume includes areas of the shallow aquifer below the White Mesa facility where groundwater contamination is found in concentrations at or above the contaminant’s respective GCAL listed in the GCAL, Part I.G Table 2. For convenience, the GCAL values are listed below.

Contaminant	Utah GWQS ⁶	Site GCAL ⁷
Chloroform	70 µg/l	70 µg/l
Dichloromethane	5 µg/l	5 µg/l
Chloromethane	30 µg/l	30 µg/l
Carbon Tetrachloride	5 µg/l	5 µg/l
Total Nitrate + Nitrite (as N)	10 mg/l	10 mg/l

Standard professional practice for determining the area or physical boundary of the contaminant plume is done by preparation of site specific shallow aquifer equipotential (equal head) and contaminant specific isoconcentration (equal

⁶ GWQS from UAC R317-6-2, Table 1.

⁷ In the case of chloroform plume, its outer physical boundary in the subsurface shall be determined by the 70 µg/l isoconcentration line, *see* GCAP, Part II.A. Each isoconcentration map prepared by DUSA shall be subject to Director approval.

- concentration) maps. These maps are required as part of the reporting requirements under Part III.B.1(c). At all times, the physical boundary and area of contaminant plumes shall be subject to Director review and approval.
2. Groundwater Contaminant Control Standard, Part II.B – This requirement is to protect the public by mandating that the chloroform plume and its related contaminants always remain on property owned by EFR.
 3. Well Construction Standards, Part II.C – This section has been added to the GCAP to ensure that any well added to the CA system in the future is adequately designed and installed. This list of requirements also reinforces the reporting requirements for new wells, when they are added, as found in Part III.E of the GCAP.
 4. Disposal of Extracted Groundwater, Part II.D – Extracted groundwater from pumping wells will be disposed in the Mill’s tailings management system or fed into the Mill process, where it will mix with process and other wastewaters from the White Mesa Mill operations. The structural integrity, wastewater and groundwater monitoring of the Mill’s tailings management system is regulated under the Permit.
 5. Pumping Well Operations Requirements, Part II.E – In order to effectively remediate the shallow aquifer using a pump and treat technology the pumping system must be mechanically maintained and operated adequately and efficiently. Therefore, the currently approved EFR document “*Operations and Maintenance Plan Chloroform Pumping System, White Mesa Mill, Blanding Utah*” must be followed as part of the GCAP. If a conflict arises, the individual requirements of the GCAP will prevail.
 8. Plume Management Performance Standards, Part II.F – Historic EFR groundwater monitoring information shows the chloroform contaminant plume has spread in three-dimensions in the shallow aquifer below the facility. Therefore, monitoring wells need to be strategically placed inside and outside the plume’s physical boundary, i.e., 70 µg/L chloroform isoconcentration line, to define its complete physical dimension/location. Pumping Wells and Performance Monitoring Wells are also required to determine plume behavior. With time, the plume dimensions could change, by either increasing or decreasing in area, or the plume traveling to a new location. When this occurs, the Director will require EFR to modify the CA system, e.g. add new wells (Pumping, PM, or CM), or modify the designation of existing wells from one function to another. Failure to meet the management requirements will constitute non-compliance with the SCO.
 9. Ground Water Contaminant Excursion Requirements, Part II. G and H – This section defines an exceedance in a CM well when 2 consecutive quarterly sampling/analytical results exceed the contaminant’s GCAL in GCAP, Table 2. This is a mechanism to ensure the chloroform plume is at all times physically defined and hydraulically controlled. An exceedance in a CM well will result in EFR being required to modify the CA system by installing new wells (Pumping, PM and/or CM) in a timely manner.

10. Chloroform Plume Monitoring Network Performance Standards for Wells within 500 feet of EFR Property Boundary, Part II.I – This section requires a more aggressive and urgent approach for the installation of monitor and pumping wells should a compliance monitor well that is located within 500 feet of the EFR property boundary exceed the Part I.G, Table 2 GCAL chloroform concentration (70 µg/L). This requirement will help ensure that the chloroform contaminant plume will stay on EFR property boundary.
11. Director Notice, Part II.J – During the course of review of EFR monitoring reports, or after performance of an on-site compliance inspection, the Director may determine that the CA system needs modification in order to comply with Parts I (CA Objectives) or II (CA Performance Standards) of the GCAP. Under these circumstances, the Director will notify EFR in writing of the required action. Thereafter, EFR will be required to comply with the directive in accordance with the requirements found in Part II of the GCAP.

After receipt of this written notice, EFR will have 90 calendar days to add new wells and install all required equipment. Aquifer permeability testing must be completed and well completion reports must then be submitted for Director approval on or before 60 calendar days after well installation, and monitoring must generally commence within 90 days after well installation.

Any changes or modifications mandated by the Director will be subject to public notice and comment when required under UAC R317-6-6.15(E).
12. Cessation of Ground Water Corrective Action, Part II.K – This performance standard is to ensure EFR secures Director approval and completes all public participation requirements before any cessation of the GCAP activities at the White Mesa facility.

Groundwater Corrective Action Monitoring and Reporting (Part III)

The Director has determined that long-term groundwater monitoring is required to verify that the EFR meets the GCAP objectives and performance standards, as set out in GCAP Parts I and II. Further, submittal of this information for Director review is authorized by UAC R317-6-6.15(E)(5)(a), -(d) to -(e). The minimum monitoring and reporting requirements are outlined below.

1. Quarterly Monitoring Requirements, Part III.A – Quarterly monitoring will be required at all Pumping Wells, PM Wells and CM Wells.
2. Groundwater Monitoring Quality Assurance Plan (“QAP”), Part III.A.1 – In order to ensure success, it is important to have an approved QAP in place. To this end, EFR has an approved QAP required by the Groundwater Discharge Permit (No. UGW370004) to meet the needs of the GCAP⁸. Director approval will be required prior to any EFR modification of the QAP.

⁸ See groundwater monitoring quality assurance requirements for the chloroform investigation, found in Appendix A of the DUSA GWMQA Plan, Revision 3, dated June 18, 2008. This same appendix has been included in subsequent versions of the plan (and approved by the Director).

3. Groundwater Monitoring Modifications, Part III.A.2 – DUSA must obtain written approval from the Director prior to any modification of groundwater monitoring or analysis procedures, methods, or equipment.
4. Quarterly Monitoring Report Content Requirements and Schedule, Part III.B – Reporting requirements below will help evaluate and determine the status of the groundwater remediation process in a timely manner.
5. Report Content Requirements, Part III.B.1 – The Director has determined minimum reporting elements are necessary for EFR routine monitoring reports to document the status of the groundwater remediation process. Some of these information requirements include:
 - A sampling and monitoring plan describing monitor wells, sampling methods, and quality assurance samples.
 - Data, maps and figures that include field data sheets, laboratory analytical reports, summary tables of water level measurements and analytical data, isoconcentration and groundwater contour maps, hydrographs and contaminant time series graphs.
 - Data interpretation of the groundwater hydraulics of the shallow aquifer and analytical data.
6. Operations and Maintenance Plan, Part III.B.2 – Operations and maintenance plan for the pumping system to assure it is operating correctly and efficiently.
7. Chloroform Correction Action Report Schedule, Part III.C– To assure timely reporting of GCAP activities, the following schedule is required:

Quarter	Period	Due Date
First	January - March	June 1
Second	April - June	September 1
Third	July - September	December 1
Fourth	October - December	March 1

8. Chloroform Plume Network Non-compliance Reporting, Part III.D - To assure the Director is notified in a timely manner, Part III.D requires that when failure of the chloroform monitoring network to meet the performance standards of Part II.J, EFR will notify the Director in writing.
9. Compliance Well Contaminant Excursion Reporting, Part III.E – To assure the Director is notified in a timely manner, Part III.E requires that when a CM Well contaminant exceeds its concentration limits in GCAL Table 2 in two consecutive quarterly sampling events, that EFR provide an exceedance notice to the Director with submittal of the next quarterly report.

10. New Well Completion Reports, Part III.F – As new wells are added to the CA network, it is important to provide construction details to the Director, in order to allow verification that the requirements of Part II.C (well construction standards) have been met. Minimum information requirements are listed, and these reports will bear the seal of a Utah licensed Professional Engineer or Geologist, as mandated for corrective action projects under UAC R317-6-6.15(D)(3).
11. Submittal Deadlines for New Well Monitoring Results, Part III.G – This section has been added to support the requirements for monitoring of new or modified wells, pursuant to the requirements in Parts I.D, and II.H and J.
12. Two-Year CACME Report, Part III.H – This section has been added to ensure there is a periodic review of the status and progress of CA activities at the White Mesa facility and current compliance status of the CA system, on a re-occurring two year interval. The first CACME Report will be submitted by March 31, 2015, and subsequent CACME Reports will be submitted every two years thereafter. Further, all future CACME Reports will be a summation and interpretation of all data collected since the previous CACME Report. In order to comply with the requirements of UAC R317-6-6.15(D)(3) and R317-6-6.15(E), the reports will need to be certified by a Utah licensed Professional Engineer or Geologist, and exposed to public notice and comment before any Director approval.

General Reporting Requirements (Part IV)

This section is to support the monitoring and reporting found in Part III of the GCAP. These requirements are similar to those found in Part II of EFR Groundwater Discharge Permit No. UGW370004.

Compliance Responsibilities (Part V)

This section is to have EFR understand their duties and responsibilities of the GCAP. These responsibilities are similar to Part III of EFR Groundwater Discharge Permit No. UGW370004.

General Requirements (Part VI)

The following requirement items that are expanded in Part VI of the GCAP are necessary to help govern the GCAP: planned changes, anticipated noncompliance, SCO/GCAP actions, duty to provide information, signature requirements, penalties for falsification of reports, availability of reports, property rights, severability, transfers, State laws and reopener provisions. These requirement items are similar to Part IV of EFR Groundwater Discharge Permit No. UGW370004.

Director Findings Required by UAC R317-6-6.15(E)

After review of the documents listed in Table 1, below, including the November, 2007 EFR CI and the August, 2007 EFR CAP, the Director has determined the requirements of UAC R317-6-6.15(E) are met by issuance of the chloroform GCAP, as follows:

1. Completeness and Accuracy of the Corrective Action Plan [§ 6.15(E)(1)] – The Director has determined that the available records of groundwater and other technical information (Table 1, below) from EFR is sufficient in completeness and accuracy to support a pump and treat remediation strategy for the White Mesa chloroform pollution.
2. Action Protective of Public Health and the Environment [§ 6.15(E)(2)] – The Director has determined that the pump and treat technology proposed and as reinforced by the GCAP requirements (e.g., performance, monitoring, and reporting standards/mandates, etc.) outlined above, will protect public health and the environment by maintaining the chloroform plume on property owned by EFR, and thus prevent exposure of the contamination to humans or wildlife.
3. Action Meets Concentration Limits [§ 6.15(E)(3)] – The groundwater cleanup concentration goals, or GCALs assigned in the proposed GCAP (see above) are based on the State GWQS in UAC R317-6-2, Table 1. Therefore, the GCAP, as proposed by the Director, meets this rule requirement.
4. Action Produces a Permanent Effect [§ 6.15(E)(4)] – The Director has determined that this requirement is met, in that:
 - A. The pump and treat technology proposed by EFR will maintain groundwater contamination in excess of the State GWQS on land owned by EFR at all times, and
 - B. Ground water quality in the chloroform plume will exhibit steady-state concentrations at or below the GCAL limits in all Pumping Wells and Performance Monitoring Wells before termination of the Radioactive Materials License.

Thus the chloroform plume will “... be controlled in place ... so that the discharge from the source following corrective action achieves ground water quality standards ...”⁹. Details on the strategy’s objectives, performance standards, operating, monitoring, and reporting requirements are provided above, and in the GCAP. While total duration of the Corrective Action’s pump and treat technology is currently unknown, the proposed SCO and related GCAP will ensure the chloroform contamination is adequately arrested, controlled, and eventually removed.
5. Action May Use Other Additional Measures [§ 6.15(E)(5)(a to e)] – The GCAP provides additional requirements the Director has determined necessary to provide adequate long-term monitoring, operation and maintenance, and periodic review¹⁰, pursuant to § 6.15(E)(5)(a, d, and e) to determine if the remediation system continues to be protective of public health and the environment. In order

⁹ See UAC R317-6-6.15(E)(4)(b).

¹⁰ Periodic review to be made possible by EFR submittal of quarterly monitoring reports for Director review/approval, and by submittal of the two-year CACME Reports.

to meet the “permanent effect” requirement, these activities will be required for the foreseeable future.

Under § 6.15E(5)(c) The Director has determined that capping the sources of chloroform (i.e., septic tanks/drain fields) or excavating these structures is not necessary. This position is based on soil gas sampling conducted in the fall of 1999, where no areas of shallow (alluvial) soil contamination at the site that would require remediation or that represent a continuing source to perched groundwater were identified. In the vicinity of the abandoned septic tanks/drain fields the slightly elevated concentrations detected are consistent with chloroform having entered these systems sometime in the past (e.g. 20 years prior to analysis).

As for environmental hazard notices or other security measures, outlined under § 6.15(E)(5)(b), these can be determined by the Director at the time of site closure and before termination of the Radioactive Materials License.

References

EPA 600/R-08/003, January 2008, "A Systematic Approach for Evaluation of Capture Zones at Pump and Treat Systems."

Freeze, R.A. and J.A. Cherry, 1979, "Groundwater", published by Prentice-Hall, Inc., 604 pp.

D'Appolonia Consulting Engineers, Inc., February, 1982, "Construction Report Initial Phase-Tailings Management System White Mesa Uranium Project Blanding, Utah Energy Fuels Nuclear Inc. Denver, Colorado."

Domenico, P.A., and F.W. Schwartz, 1990, "Physical and Chemical Hydrogeology", published by John Wiley and Sons, Inc., 824 pp.

DRC, August 23, 1999, Letter Re: White Mesa Mill Notice of Violation and Groundwater Corrective Action Order, Docket No. UGW20-01.

DRC, June 7, 2001, "October 4, 2000 IUC and HGC Investigation of Elevated Chloroform Contamination In Perched Groundwater at the White Mesa Uranium Mill Near Blanding, Utah: August 23, 1999 Utah Division of Water Quality Notice of Violation and Groundwater Corrective Action Order: Docket No. UGW20-01: Request for Additional Information"

DRC, September 17, 2008, Letter Subject: September 16, 2008 DUSA Email Conveying Proposed Revisions to the Cell 4A BAT Monitoring, Operations and Maintenance Plan (O&M Plan); September 16, 2008 DRC Email with Comments on the O&M Plan; September 12, 2008 DUSA Email conveying Proposed Revisions to the White Mesa Mill Tailings Management System; Discharge Minimization Technology (DMT) Monitoring Plan (DMT Plan) and the O&M Plan; O&M Plan and DMT Plan Approval, and Authorization to Operate Tailings Cell 4A.

DRC, January 27, 2011, Letter Subject: January 21, 2011 General Surety Rider Executed by Denison Mines (USA) Corp as Principal and National Union Fire Insurance Company as Surety; Approval of Evidence of Surety, and Authorization to Operate Tailings Cell 4B.

DUSA, August 20, 2007, "Preliminary Corrective Action Plan White Mesa Uranium Mill Near Blanding, Utah", consultants report prepared by Hydro Geo Chem, Inc., 51 pp., 5 tables, 15 figures, 3 appendices.

DUSA, November 20, 2007, "Preliminary Contamination Investigation Report White Mesa Uranium Mill Near Blanding Utah" Energy Fuels Nuclear, Inc., March 1983, "Construction Report Second Phase Tailings Management System White Mesa Uranium Project Energy Fuels Nuclear, Inc."

DUSA, June 18, 2008, “White Mesa Uranium Mill Ground Water Monitoring Quality Assurance Plan (QAP) State of Utah Groundwater Discharge Permit No. UGW370004”, company plan, 48 pp.

Energy Fuels Nuclear, March 1983, “Construction Report Second Phase Tailings Management System” White Mesa Uranium Project.

International Uranium Corporation, May 28, 1999, “Groundwater Information Report White Mesa Uranium Mill Blanding, Utah.”

International Uranium Corporation and Hydro Geo Chem, Inc., November 9, 2001, “Update to Report Elevated Chloroform Concentrations in Perched Groundwater at White Mesa Uranium Mill Near Blanding, Utah.”

International Uranium Corporation, October 20, 2006, RE: International Uranium Corporation, Merger with Denison Mines Inc. and Name Change. State of Utah Ground Water Discharge Permit No. UGW370004.

Hintze, L.F., 1988, “ Geologic History of Utah”, Brigham Young University Geology Studies Special Publication 7, 202 pp.

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Titan Environmental Corporation, July 1994, “Hydrogeologic Evaluation of White Mesa Uranium Mill.”

Table 1: GCAP Related DRC and EFR Documents

DRC Documents	EFR/DUSA/IUC Documents ¹¹
<i>(Document Date)</i> Document Title, subject, or reason	
	<i>(February 24, 1999)</i> Requested Information During February 19, 1999 Teleconference.
	<i>(March 4, 1999)</i> Additional Sampling at White Mesa.
	<i>(April 1, 1999)</i> Preparation for Split Sampling at the White Mesa Mill.
	<i>(April 15, 1999)</i> Preparation for Split Sampling at the White Mesa Mill.
	<i>(June 3, 1999)</i> Confirmation of Chemical Parameters Analyses in White Mesa Groundwater Split Samples.
<i>(August 23, 1999)</i> White Mesa Uranium Mill: Notice of Violation and Groundwater Corrective Action Order, Docket No. UGW20-01 August 23, 1999.	
	<i>(September 9, 1999)</i> Preliminary results and implications of the soil gas sampling performed at the White Mesa Mill Site.
	<i>(September 20, 1999)</i> Schedule for Contamination Investigation Submittals.
	<i>(September 20, 1999)</i> Agreement to Extend Time Period for Review of Utah Water Quality Board Notice of Violation (Docket No. UGW20-01) Issued to International Uranium (USA) Corporation White Mesa Mill.
	<i>(September 21, 1999)</i> Plan and Timetable for Groundwater Contamination Investigation and Report I Response to Utah DEQ Notice of Violation and Groundwater Corrective Action Order, UDEQ Docket No. UGW20-01, Issued on August 23, 1999.
	<i>(September 21, 1999)</i> RCRA Analysis of Chloroform Contaminated Water to be Pumped From Monitor Well #4.
	<i>(September 21, 1999)</i> Transmittal of Phase I Chloroform Source Assessment Report for Chloroform Investigation Phase I – Utah DEQ Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01, Issued on August 23, 1999.
<i>(October 1, 1999)</i> Notice of Violation and Order (NOV), Docket No. UGW20-01 Request for Hearing.	
	<i>(October 22, 1999)</i> Transmittal of Interim Results and Revised Work Plan for Chloroform Investigation Phase 2 - Utah DEQ Notice of

¹¹ Prior to October, 2006, DUSA was known as the International Uranium Corporation (USA) or IUC.

DRC Documents	EFR/DUSA/IUC Documents ¹¹
	Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01, Issued on August 23, 1999.
	<i>(November 29, 1999)</i> Transmittal Report of Eight Other Parameters Discussed in UDEQ Transmittal Letter of August 23, 1999 - Utah DEQ Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01, Issued on August 23, 1999.
	<i>(January 28, 2000)</i> Transmittal of Program for Delineation of Elevated Chloroform in Perched Groundwater at MW-4, for Chloroform Investigation Phase 4 - Utah DEQ Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01, Issued on August 23, 1999.
<i>(February 7, 2000)</i> May, 1999 IUC Groundwater Information Report: DRC Request for Additional Information Related to Site Hydrogeology.	
	<i>(June 30, 2000)</i> Interim Report and Revised Plan for Chloroform Investigation Utah DEQ Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01, Issued on August 23, 1999.
<i>(July 3, 2000)</i> White Mesa Uranium Mill: Utah Division of Water Quality Notice of Violation and Groundwater Corrective Action Order Docket No. UGW20-01: Request for Additional Information.	
<i>(July 10, 2000)</i> White Mesa Uranium Mill Chloroform Investigation in Well MW-4: Request for Additional Information.	
<i>(July 10, 2000)</i> June 30, 2000 IUC Interim Report and Revised Work Plan for Chloroform Investigation: August 23, 1999 Utah Division of Water Quality Notice of Violation and Groundwater Corrective Action Order Docket No. UGW20-01: Request for Additional Information.	
	<i>(August 4, 2000)</i> White Mesa Uranium Mill; August 23, 1999 Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01, Request for Additional Information.
	<i>(September 8, 2000)</i> Groundwater Information Report Revision Package.
	<i>(October 4, 2000)</i> Investigation of Elevated Chloroform Concentrations in Perched Groundwater at the White Mesa Mill Near Blanding, Utah.
	<i>(October 4, 2000)</i> Transmittal of IUSA's Field Notes and Analytical Results from November/December 2000 Groundwater Split sampling at the White Mesa Uranium Mill, Near Blanding,

DRC Documents	EFR/DUSA/IUC Documents ¹¹
	Utah.
	<i>(October 4, 2000)</i> Investigation of the Elevated Chloroform Concentrations in Perched Groundwater at the White Mesa Uranium Mill Near Blanding, Utah.
<i>(June 7, 2001)</i> October 4, 2000 IUC and HGC Investigation of Elevated Chloroform Concentrations in Perched Groundwater at the White Mesa Uranium Mill Near Blanding, Utah: August 23, 1999 Utah Division of Water Quality Notice of Violation and Groundwater Corrective Action Order Docket No. UGW20-01: Request for Additional Information.	
	<i>(November 9, 2001)</i> Update report regarding IUSA's October 4, 2000 report in investigation of elevated Chloroform Concentrations in Perched Groundwater at the White Mesa Mill. Utah Division of Water Quality Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01.
<i>(March 7, 2002)</i> November 12, 2001 HGC Evaluation of Hydraulic Test Data at MW-4 White Mesa Uranium Mill Site Blanding, Utah: Request for Additional Information and Installation of New Monitoring Well Adjacent to MW-4.	
<i>(April 11, 2002)</i> November 9, 2001 IUC Update Report on Ongoing Chloroform Investigation at White Mesa Uranium Mill; August 23, 1999 Utah Division of Water Quality Notice of Violation and Groundwater Corrective Action Order Docket No. UGW20-01: Request for Additional Information.	
	<i>(April 19, 2002)</i> Response to DRC March 7, 2002 Letter to International Uranium (USA) Corporation Figure 7 of the Chloroform updated Report dated November 9, 2001.
	<i>(May 3, 2002)</i> Chloroform Investigation Schedule.
	<i>(May 9, 2002)</i> Transmittal of Temporary Well and Piezometer Installation/Completion Report Utah Division of Water Quality Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01.
	<i>(May 10, 2002)</i> Interim Action Involving Pumping and Reuse of Chloroform Contaminated Water.
	<i>(May 16, 2002)</i> Work Plan for Installation of Additional Wells Further Delineation of the Chloroform Plume – White Mesa Mill.
	<i>(May 24, 2002)</i> Work Plan for Hydraulic Testing of Perched Zone.
	<i>(July 25, 2002)</i>

DRC Documents	EFR/DUSA/IUC Documents ¹¹
	Work Plan for Long Term Pumping Test at MW-4 White Mesa Uranium Mill Site Near Blanding, Utah.
	<i>(July 31, 2002)</i> Interim Action Involving Pumping and Reuse of Chloroform Contaminated Water.
	<i>(August 2, 2002)</i> Work Plan for Long-Term Pumping Test at MW-4 White Mesa Uranium Mill Site Near Blanding, Utah.
	<i>(August 22, 2002)</i> Hydraulic Testing At the White Mesa Uranium Mill Site Near Blanding, Utah During July 2002.
	<i>(August 23, 2002)</i> Transmittal of Hydraulic Test Report Utah DEQ Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01 August 23, 1999.
	<i>(August 30, 2002)</i> Transmittal of Temporary Well Installation Report Utah DEQ Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01 August 23, 1999.
	<i>(September 6, 2002)</i> Transmittal of Additional Analytical Results from November/December 2000 Groundwater Split Sampling at the White Mesa Mill.
	<i>(September 6, 2002)</i> Transmittal of Brushy Basin Contour Map, White Mesa Mill Site, Utah DEQ Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01.
	<i>(October 15, 2002)</i> Water Level Map and Resolution of Increasing Water Levels Observed in MW-4, Utah DEQ Notice of Violation and Groundwater Corrective Action Order. UDEQ Docket No. UGW 20-01.
	<i>(January 30, 2003)</i> Site Hydrogeology and Estimation of Groundwater Travel Times In the Perched Zone White Mesa Mill Site Near Blanding, Utah.
	<i>(May 10, 2003)</i> Transmittal of State Results from September, 2002 Split Sampling Event: IUC White Mesa Facility Groundwater Quality Samples.
	<i>(June 9, 2003)</i> Transmittal of IUSA's Analytical Results from September 2002 Groundwater Split Sampling at the White Mesa Uranium Mill, Blanding Utah.
	<i>(June 9, 2003)</i> Long Term Pump Test Monitor Well-4 Operations April and May, 2003.
	<i>(July 9, 2003)</i> Interim Report Long Term Pumping at MW-4 and TW4-19 White Mesa Uranium Mill Near Blanding, Utah.
	<i>(July 14, 2003)</i> Transmittal of Interim Report – Long Term Pumping at MW4 and TW4-19 Utah DEQ Notice of Violation and

DRC Documents	EFR/DUSA/IUC Documents ¹¹
	Groundwater Corrective Action Order UDEQ Docket No. UGW20-01 on August 23, 1999.
	<i>(August 4, 2003)</i> Long Term Pump Test Monitor Well-4 Operations July, 2003.
	<i>(September 26, 2003)</i> Long Term Pump Test Monitor Well-4 Operations August, 2003.
	<i>(October 17, 2003)</i> September 16, 2003 Letter from Utah Department of Environmental Quality, Division of Water Quality to International Uranium (USA) Corporation.
	<i>(November 3, 2003)</i> Long Term Pump Test Monitor Well-4 Operations Report For September 2003.
	<i>(November 12, 2003)</i> Long Term Pump Test Monitor Well-4 Operations Report For October 2003.
<i>(November 24, 2003)</i> November 21, 2003 IUC Request for Recovery Period and Change in Groundwater Remediation System Operation: Utah Water Quality Board August 23, 1999 Groundwater Corrective Action Order: Conditional Approval and Request for Additional Information.	
	<i>(January 8, 2004)</i> Long Term Pump Test, Monitor Well 4 – Operation Report Utah DEQ Notice of Violation and Groundwater Corrective Action Order; Docket No. UGW20-01 of August 23, 1999.
<i>(April 27, 2004)</i> Review of the July 9, 2003 Interim Report Long Term Pumping At MW-4 and TW4-19: August 23, 1999. Utah Division of Water Quality Notice of Violation and Groundwater Corrective Action Order; Docket No. UGW20-01: Request for Additional Information.	
	<i>(May 26, 2004)</i> Final Report Long Term Pumping at MW4-19 and TW4-15 White Mesa Uranium Mill Site Near Blanding, Utah.
	<i>(May 28, 2004)</i> Division of Radiation Control Review of Interim Report Long Term Pumping at MW-4 and TW4-19, Request for Additional Information.
	<i>(August 26, 2004)</i> Division of Radiation Control (“DRC”) Review of Interim Reporting Long Term Pumping at MW-4 and TW4-19, May 5, 2004, International Uranium (USA) Corporation response letter.
	<i>(October 20, 2004)</i> Hydro Geo Chem, Inc. Report on Perched Zone Water Movement.
	<i>(January 6, 2005)</i> Long Term Pump Test Monitor Well-4 Operations Report For October 2003.
	<i>(February 22, 2005)</i> Work Plan for Installation of 8 New Groundwater

DRC Documents	EFR/DUSA/IUC Documents ¹¹
	Monitoring Wells and Additional Chloroform Investigation Wells.
<i>(March 9, 2005)</i> Groundwater Contamination Investigation Report and Groundwater Corrective Action Plan White Mesa Uranium Mill Near Blanding, Utah: August 23, 1999. Notice of Violation and Groundwater Corrective Action Order; Docket No. UGW20-01: Request for Additional Information.	
	<i>(March 22, 2005)</i> Work Plan for Installation of 8 New Groundwater Monitoring Wells and Additional Chloroform Investigation Wells [Revision 1.0].
	<i>(March 25, 2005)</i> Long Term Pump Test Monitor Well 4 - Operations Report Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGW-20-01 of August 23, 1999.
<i>(April 5, 2005)</i> Revision 1.0, March 23, 2005 IUC Work Plan for Installation of 8 New Groundwater Monitoring Wells and Additional Chloroform Investigation Wells White Mesa Uranium Mill Blanding, Utah: Ground Water Discharge Permit No. UGW370004 (Permit); and August 23, 1999. Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGW20-01 – Approval.	
	<i>(April 14, 2005)</i> Groundwater Contamination Investigation Report and Groundwater Corrective Action Plan White Mesa Uranium Mill Near Blanding, Utah: August 23, 1999 Notice of Violation and Groundwater Corrective Action Order Docket No. UGW20-01.
	<i>(May 17, 2005)</i> Groundwater Contamination Investigation Report and Groundwater Corrective Action Plan for White Mesa Uranium Mill Near Blanding, Utah / Operations and Maintenance Plan For Pumping System.
	<i>(July 26, 2005)</i> Groundwater Contamination Investigation Report and Groundwater Corrective Action Plan White Mesa Uranium Mill Near Blanding, Utah: August 23, 1999 Notice of Violation and Groundwater Corrective Action Order Docket No. UGW20-01.
	<i>(August 3, 2005)</i> Perched Monitoring Well Installation and Testing At The White Mesa Uranium Mill April Through June 2005.
<i>(November 22, 2005)</i> June 28, 2005 Meeting With Hydro Geo Chem, Inc. (HGC), International Uranium Corporation (IUC), and the Division of Radiation Control (DRC), DRC Findings and Request for Additional Information.	
<i>(December 6, 2005)</i> July 26, 2005 Operations and Maintenance Plan (Plan), for the Chloroform Investigation Wells at the White Mesa	

DRC Documents	EFR/DUSA/IUC Documents ¹¹
Uranium Mill Near Blanding Utah, Discharge Permit No. UGW370004 – Second Request for Modifications to the Plan.	
	<p><i>(January 12, 2006)</i> July 26, 2005 Operations and Maintenance Plan (Plan), for the Chloroform Investigation Wells at the White Mesa Uranium Mill Blanding Utah, Discharge Permit No. UGW370004 – Division of Radiation Control (“DRC”). Second Request for Modifications to the Plan.</p>
	<p><i>(February, 2006)</i> Work Plan for Installation of Additional Chloroform Investigation Wells and Well Abandonment and Re-Completion White Mesa Uranium Mill Blanding Utah.</p>
	<p><i>(February 13, 2006)</i> June 28, 2005 Meeting With Hydro Geo Chem, Inc, International Uranium Corporation (IUC), and the Division of Radiation Control (DRC), DRC Findings and Request for Additional Information.</p>
	<p><i>(February 13, 2006)</i> June 28, 2005 Meeting With Hydro Geo Chem, Inc, International Uranium Corporation (IUC), and the Division of Radiation Control (DRC), DRC Findings and Request for Additional Information. (Included DVD copies of video logs).</p>
	<p><i>(March 24, 2006)</i> Work Plan Evaluation of Fate and Transport of Chloroform Detected in the Perched Groundwater White Mesa Uranium Mill Near Blanding Utah.</p>
<p><i>(October 25, 2006)</i> IUC’s February 6, and February 13, Response to the Utah Division of Radiation Control (DRC) to November 22, 2005 letter of Findings and Request of Additional Information. Contamination Investigation (CI) and the Final Corrective Action Plan (CAP) – DRC Findings, Conditional Approval, and Notice of Intent to Schedule Hearing Before the Board.</p>	
	<p><i>(November, 2006)</i> Work Plan for Installation of Additional Chloroform Investigation Wells and Well Abandonment and Re-Completion White Mesa Uranium Mill Blanding Utah.</p>
<p><i>(November 29, 2006)</i> March 31, 2006 IUC Submittal Regarding Fate and Transport Modeling Work Plan for Chloroform. IUC, White Mesa Uranium Mill, Blanding Utah: DRC Findings and Notice to Proceed.</p>	<p><i>(November 29, 2006)</i> IUC’s February 6, and February 13, 2006 Response to the Utah Division of Radiation Control (DRC) to November 22, 2005 letter of Findings and Request for Additional Information, Contamination Investigation (CI) and Corrective Action Plan (CAP) – DRC Findings, Conditional Approval, and Notice of intent to Schedule Hearing Before the Board.</p>
	<p><i>(August 20, 2007)</i> Preliminary Corrective Action Plan White Mesa Uranium Mill Near Blanding, Utah.</p>
<p><i>(November 19, 2007)</i> Revised Hydrogeologic Report (Report) as required of the White Mesa Mill, Ground Water Discharge Permit No.</p>	

DRC Documents	EFR/DUSA/IUC Documents ¹¹
UGW370004 (Permit), Part I.H.2: Closeout Letter and Notice of Enforcement Discretion.	
	<i>(November 20, 2007)</i> Preliminary Contamination Investigation Report White Mesa Uranium Mill Near Blanding Utah.
<i>(April 14, 2009)</i> Operations and Maintenance Plan Chloroform Pumping System White Mesa Uranium Mill, Blanding Utah, Revision 1.0. Confirmatory Action Letter.	
<i>(November 10, 2009)</i> DUSA 3rd Quarter, 2008 (dated November 2008), 4th Quarter, 2008 (dated February 2009), and 1st Quarter 2009 (dated May 2009), White Mesa Uranium Mill Chloroform Monitoring Reports: Notice of Violation and Compliance Order, Docket No. UGW09-05.	
	<i>(December 14, 2009)</i> DUSA 3 rd Quarter, 2008, 4 th Quarter, 2008 and 1 st Quarter 2009, Chloroform Monitoring Reports: Notice of Violation and Compliance Order, Docket No. UGW09-04.
	<i>(December 18, 2009)</i> White Mesa Uranium Mill Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGW-20-01- Supplemental Addenda: 3 rd Quarter 2008, 4 th Quarter 2008, 1 st Quarter 2009 and 2 nd Quarter Chloroform Monitoring Reports.
	<i>(December 31, 2009)</i> Chloroform Contamination Investigation. Chloroform Concentrations Exceeding the Groundwater Quality Standard I Monitor Well TW4-6. Request for a Submittal of a Plan of Action and Work Schedule. Confirmatory Action Letter.
<i>(February 11, 2010)</i> Review of the White Mesa Mill Chloroform Monitoring Report 2nd Quarter (April through June) 2009, Denison Mines (USA) Corp. Notice of Enforcement Discretion and Closeout Letter.	
<i>(February 18, 2010)</i> Review of the White Mesa Uranium Mill Chloroform Monitoring Report 3rd Quarter (July through September) 2009, Denison Mines (USA) Corp. Notice of Enforcement Discretion Recommendation and Closeout Letter.	
<i>(February 18, 2010)</i> Chloroform Contamination Investigation. Chloroform Concentrations Exceeding the Groundwater Quality Standard in Monitor Well TW4-6. Submittal of a Revised Plan of Action and Work Schedule. Confirmatory Action Letter.	
	<i>(March 22, 2010)</i> Chloroform Investigation Monitoring Quality Assurance Program White Mesa Uranium Mill Blanding, Utah.

DRC Documents	EFR/DUSA/IUC Documents ¹¹
<p><i>(April 8, 2010)</i> April, 2009 DUSA Operations and Maintenance Plan Chloroform Pumping System. Chloroform Contamination Investigation, White Mesa Uranium Mill, - Conditional Approval Letter.</p>	
<p><i>(April 8, 2010)</i> Chloroform Contamination Investigation. Chloroform Concentrations Exceeding The Groundwater Quality Standard in Monitor Well TW4-6. Submittal of a Plan of Action and Work Schedule. White Mesa Uranium Mill - Conditional Approval Letter.</p>	
<p><i>(June 1, 2010)</i> White Mesa Uranium Mill - Plan of Action and Schedule for Modification of Groundwater Monitoring Quality Assurance Plan to Address Turbidity Stabilization and Conversion to Low-Flow Sampling and Request for Interim Variance: Request for Information.</p>	
	<p><i>(June 24, 2010)</i> Response to Request for Information Dated June 1, 2010 White Mesa Uranium Mill - Modification of Groundwater Monitoring Quality Assurance Plan to Address Turbidity Stabilization and Low-Flow Sampling and Request for Interim Variance.</p>
	<p><i>(July 26, 2010)</i> Response to Request for Information Dated June 24, 2010 White Mesa Uranium Mill - As-Built Report for Chloroform Monitor Well TW4-26.</p>
	<p><i>(September 27, 2010)</i> State of Utah Ground Water Discharge Permit No. UGW370004 White Mesa Uranium Mill – Transmittal of Hydraulic Testing Report.</p>
	<p><i>(February 22, 2011)</i> White Mesa Uranium Mill – Notice of Violation and Corrective Action Order UDEQ Docket No. UGQ-20-01 Notice Pursuant to the Chloroform Pumping Well Operations and Maintenance Plan.</p>
<p><i>(May 26, 2011)</i> Chloroform Contamination Investigation. Notice of Violation and Groundwater Corrective Action Order, Docket No. UGW20-01. Plan of Action and Work Schedule, Request For Additional Information (RFI).</p>	
	<p><i>(June 17, 2011)</i> State of Utah Ground Water Discharge Permit (“GWDP”) No. UGW370004 Notice of Violation and Groundwater Corrective Action, Docket No. UGW20-01 – Request for Additional Information.</p>
<p><i>(August 15, 2011)</i> Chloroform Contamination Investigation. Notice of Violation and Groundwater Corrective Action Order. Docket No. UGW20-01. DUSA Submittal of a Plan and Work Schedule to Drill and Install Well TW4-27 – Conditional Approval Letter.</p>	
<p><i>(September 22, 2011)</i> Chloroform Contamination Investigation. Notice of</p>	

DRC Documents	EFR/DUSA/IUC Documents ¹¹
Violation and Groundwater Corrective Action Order, Docket No. UGW20-01. DUSA Submittal of a Plan and Work Schedule to Drill and Install Well TW4-27 - Conditional Approval Letter.	
	<p><i>(October 3, 2011)</i> State of Utah Groundwater Discharge Permit ("GWDP") No. UGW370004. Notice of Violation and Groundwater Corrective Action Order, Docket No. UGW20-01. Denison Mines ("USA") Corp. Submittal of a Plan and Work Schedule to Drill and Install Well TW4-27 -Conditional Approval Letter.</p>
<p><i>(November 14, 2011)</i> Denison Mines ("USA") Corp. March 17, 2010 Letter Report for the Installation and Hydraulic Testing of Perched Groundwater Monitoring Wells TW4-23, TW4-24 and TW4-25 at the White Mesa Uranium Mill – Request For Additional Information.</p>	
<p><i>(November 14, 2011)</i> Denison Mines (USA) Corp. ("DUSA") Chloroform Contamination Investigation, Installation of Monitor well TW4-26 Closeout Letter.</p>	
	<p><i>(November 28, 2011)</i> Denison Mines (USA) Corp. ("Denson") Response to Utah Division of Radiation Control ("DRC") Request for Additional Information to the March 17, 2010 Letter Report for the Installation and Hydraulic testing of Perched Groundwater Wells TW4-23, TW4-24 and TW4-25 at the White Mesa Uranium Mill.</p>
<p><i>(November 29, 2011)</i> 1st Quarter 2011 Chloroform Monitoring Report and 2nd Quarter 2011 Chloroform Monitoring Report for the Chloroform Contamination Investigation, Denison Mines (USA) Corp. (hereafter "DUSA"), White Mesa Uranium Mill, near Blanding, Utah, Closeout Letter.</p>	
<p><i>(January 17, 2012)</i> 3rd Quarter 2011 Chloroform Monitoring Report for the Chloroform Contamination Investigation, Dennison Mines (USA) Corp. (hereafter "DUSA"), White Mesa Uranium Mill, near Blanding, Utah, Closeout Letter and Notice of Enforcement Discretion.</p>	
<p><i>(May 23, 2012)</i> 4th Quarter, 2011 Chloroform Monitoring Report for the Chloroform Contamination Investigation, Denison Mines (USA) Corp. (hereafter "DUSA"), White Mesa Uranium Mill near Blanding, Utah, Closeout Letter and Notice of Enforcement Discretion.</p>	
<p><i>(May 30, 2012)</i> Plan of Action and Work Schedule Revision 1 for the Installation of One or More Wells Downgradient of TW4-4 and TW4-6: Notice of Violation and Compliance Order, Docket No. UGW12-05.</p>	
	<p><i>(July 3, 2012)</i> Plan of Action and Work Schedule Revision 1 for the Installation of One or More Wells Downgradient of TW4-4</p>

DRC Documents	EFR/DUSA/IUC Documents ¹¹
	and TW4-6 - Notice of Violation and Compliance Order, Docket No. UGW12-05.
<p><i>(February 7, 2013)</i> Nitrate Contamination Investigation. Nitrate Concentrations Exceeding the Groundwater Quality Standard in Monitor Wells TW4-12 and TW4-27. Request for a Submittal of a Plan of Action and Work Schedule. Confirmatory Action Letter.</p> <p>Note: This Confirmatory Action Letter is to install four new monitor wells TW4-28, TW4-29, TW4-30 and TW4-31.</p>	
	<p><i>(April 30, 2013)</i> State of Utah Ground Water Discharge Permit (“the Permit”) No. UGW370004 White Mesa Uranium Mill – Installation Report Pursuant to Part I.F.6 of the Permit.</p> <p>Note: Installation Report is for monitor wells TW4-28, TW4-29, TW4-30 and TW4-31.</p>
<p><i>(August 2, 2013)</i> Nitrate Contamination Investigation at Monitor Wells TW4-12 and TW4-28. Chloroform Contamination Investigation at Monitor Well TW4-29. Conditional Approval.</p>	
	<p><i>(October 30, 2013)</i> State of Utah Ground Water Discharge Permit (“the Permit”) No. UGW370004 White Mesa Uranium Mill – Installation Report Pursuant to Part I.F.6 of the Permit.</p> <p>Note: Installation Report is for monitor wells TW4-32, TW4-33 and TW4-34.</p>
	<p><i>(January 23, 2014)</i> Contamination Investigation Report TW4-12 and TW4-27 Areas, White Mesa Uranium Mill Near Blanding, Utah.</p>
<p><i>(April 7, 2014)</i> Nitrate Contamination Investigation. Nitrate Concentrations Exceeding the Groundwater Quality Standard in Monitor Wells TW4-12 and TW4-27. Request for a Submittal of a Plan of Action and Work Schedule. Confirmatory Action Letter.</p>	
	<p><i>(July 1, 2014)</i> State of Utah Ground Water Discharge Permit (“the Permit”) No. UGW370004 White Mesa Uranium Mill – As-Built Report Pursuant to Part I.F.6 of the Permit.</p> <p>Note: Installation and Hydraulic Testing of Perched Monitoring Wells TW4-35 And TW4-36 White Mesa Uranium Mill Near Blanding, Utah (As-Built Report).</p>

Attachment 1: EFR/DUSA/IUC Chloroform Quarterly Monitoring Reports

Listed below are 14 DUSA quarterly monitoring reports from the 4th quarter 2001 (October through December) to 1st quarter 2005 (January through March) that IUC/IUSA submitted to DRC, that provided only raw laboratory analytical results for the chloroform monitoring data for groundwater collected from the chloroform monitoring wells:

1. (April 19, 2002)
Transmittal of 4th Quarter 2001 and 1st Quarter 2002 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
2. (August 1, 2002)
Transmittal of 2nd Quarter 2002 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
3. (September 10, 2002)
Transmittal of 3rd Quarter 2002 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
4. (April 10, 2003)
Transmittal of 4th Quarter 2002 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
5. (May 15, 2003)
Transmittal of 1st Quarter 2003 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
6. (August 4, 2003)
Transmittal of 2nd Quarter 2003 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
7. (January 6, 2005)
Transmittal of 3rd Quarter 2003 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.

8. (January 6, 2005)
Transmittal of 4th Quarter 2003 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
9. (January 6, 2005)
Transmittal of 1st Quarter 2004 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
10. (January 6, 2005)
Transmittal of 2nd Quarter 2004 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
11. (January 6, 2005)
Transmittal of 3rd Quarter 2004 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
12. (January 6, 2005)
Transmittal of 4th Quarter 2004 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.
13. (January 6, 2005)
Transmittal of 1st Quarter 2005 Chloroform Monitoring Data Utah DEQ Notice of Violation and Groundwater Corrective Action Order UDEQ Docket No. UGQ-20-01 of August 23, 1999.

Listed below are more than 35 chloroform monitoring quarterly reports beginning with the 2nd quarter 2005 (April through June) that IUC/IUSA, DUSA or EFR (after October 2006) submitted to the DRC that included data interpretation, laboratory analytical reports, and conclusions and recommendations for the chloroform monitoring data for groundwater collected from the chloroform monitoring wells:

1. (August 1, 2005)
Transmittal of 2nd Quarter 2005 Routine Chloroform Monitoring Report UDEQ Docket No. UGQ-20-01 White Mesa Uranium Mill.
2. (October 31, 2005)
Transmittal of 3rd Quarter 2005 Routine Chloroform Monitoring Report UDEQ Docket No. UGQ-20-01 White Mesa Uranium Mill.

3. (January 31, 2006)
Transmittal of 4th Quarter 2005 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
4. (May 3, 2006)
Transmittal of 1st Quarter 2006 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
5. (July 31, 2006)
Transmittal of 2nd Quarter 2006 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
6. (October 31, 2006)
Transmittal of 3rd Quarter 2006 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
7. (January 31, 2007)
Transmittal of 4th Quarter 2006 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20- White Mesa Uranium Mill.
8. (May 30, 2007)
Transmittal of 1st Quarter 2007 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
9. (August 31, 2007)
Transmittal of 2nd Quarter 2007 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
10. (December 4, 2007)
Transmittal of 3rd Quarter 2007 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
11. (February 4, 2008)
Transmittal of 4th Quarter 2007 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
12. (May 30, 2008)
Transmittal of 1st Quarter 2008 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
13. (August 29, 2008)
Transmittal of 2nd Quarter 2008 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.

14. (November 1, 2008)
Transmittal of 3rd Quarter 2008 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
15. (February 25, 2009)
Transmittal of 4th Quarter 2008 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
16. (June 1, 2009)
Transmittal of 1st Quarter 2009 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
17. (August 30, 2009)
Transmittal of 2nd Quarter 2009 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
18. (December 2, 2009)
Transmittal of 3rd Quarter 2009 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
19. (March 1, 2010)
Transmittal of 4th Quarter 2009 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
20. (June 1, 2010)
Transmittal of 1st Quarter 2010 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
21. (August 20, 2010)
Transmittal of 2nd Quarter 2010 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
22. (November 24, 2010)
Transmittal of 3rd Quarter 2010 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
23. (February 24, 2011)
Transmittal of 4th Quarter 2010 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
24. (May 20, 2011)
Transmittal of 1st Quarter 2011 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.

25. (September 1, 2011)
Transmittal of 2nd Quarter 2011 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
26. (November 28, 2011)
Transmittal of 3rd Quarter 2011 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill
27. (February 27, 2012)
Transmittal of 4th Quarter 2011 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill
28. (May 30, 2012)
Transmittal of 1st Quarter 2012 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
29. (August 30, 2012)
Transmittal of 2nd Quarter 2012 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
30. (November 27, 2012)
Transmittal of 3rd Quarter 2012 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill
31. (February 18, 2013)
Transmittal of 4th Quarter 2012 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill
32. (May 28, 2013)
Transmittal of 1st Quarter 2013 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
33. (August 26, 2013)
Transmittal of 2nd Quarter 2013 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.
34. (November 19, 2013)
Transmittal of 3rd Quarter 2013 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill
35. (February 19, 2014)
Transmittal of 4th Quarter 2013 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill

36. (May 19, 2014)
Transmittal of 1st Quarter 2014 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.

37. (August 13, 2014)
Transmittal of 2nd Quarter 2014 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.

38. (November 11, 2014)
Transmittal of 3rd Quarter 2014 Routine Chloroform Monitoring Report UDEQ
Docket No. UGQ-20-01 White Mesa Uranium Mill.