Fax: From Brian Graves
Letter: From URI, Inc.

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PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

NAME: BRIAN GRAVES

LOCATION:

PHONE NUMBER: 655-2191

FROM: MARK PELISSA URI, Inc./Dallas, TX 75251

MESSAGE: THIS IS PROBABLY MORE INFO THAN YOU WANTED. HOWEVER IT IS THE ENTIRE TEST RESULT. NOTE THAT THE SE VALUES BECOME INCONSEQUENTIAL AS THE STABILITY PERIOD PROCEEDS. ALTHOUGH THERE ARE

IF YOU HAVE ANY PROBLEMS RECEIVING THIS TRANSMISSION, PLEASE CALL OUR OFFICE AT: (214) 387-7777.

OUR TELECOPY NUMBER IS: (214) 387-7779.

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NEVER BEEN A CONFIRMED EXPLANATION OF THE ANOMALOUS SE VALUES. I REASONABLY THINK THIS PROBLEM WAS IN THE LAB.

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

		AUGUST		SEPTEMBER			OCTOBER				
PARAMETER	BASELINE 6-30	8-12	8-19	9-9	9-19	9-19	9-23*'	10-7	10-14	10-21	10-26
CALCIUM	35	173	208	190	208	175	231	260	274	300	
MAGNESIUM	7.6					38					
SODIUM	383					589					
POTASSIUM	9.4					24					
CARBONATE	0					0					
BICARBONATE	485	412	416	428	416	381	430	431	426	494	
SULFATE	174	731	758	743	758	789	874	906	737	882	971
CHLORIDE	277	496	551	508	551	563	608	640	846	607	
NITRATE	0.17					0.05					
FLUORIDE	0.52					0.39					
SILICA	26					27					
TDS	1210					2500					
CONDUCTIVITY	1915	3190	3562	3375	3562	3700	4000	3960	4250	4430	4360
ALKALINITY	386					312					
pH (s.u.)	7.59	7.67	7.05	7.35	7.5	7.9	7.5	6.97	6.88	6.67	
ARSENIC	0.05					0.004					
CADMIUM	<.0001					0.0006					
IRON	7.7			1.2		0.4					
LEAD	<.001					<.001					
MANGANESE	0.15					0.29					
MERCURY	<.0001					<.0001					
MOLY	0.28			8		8.9					
SELENIUM	0.005					0.015					
URANIUM	0.014	10.3	5.5	8.1	5.5	4.5	6.9	8.7	8.1	7.3	
AMMONIA	0.105					0.09					
RADIUM 226 (pCi/l)	12.3					94					

RESTORATION BEGAN 12-1-88
ALL UNITS ARE P.P.M. UNLESS OTHERWISE INDICATED
* WELL 119 ONLY
** WELL 121 ONLY FROM NOW ON. WELL 119 WAS PUT ON INJECTION AND 120 SHUT IN.
***BEGIN STABILITY. AVERAGE OF ALL WELLS.

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

		NOVEMBER							DECEMBER		
PARAMETER	BASELINE 6-30	10-27	10-28	10-31	11-3	11-4	11-7	11-18	11-29	12-12	12-14
CALCIUM	35		340			330	330	337	318	304	265
MAGNESIUM	7.6							65	60		
SODIUM	383							692	698		
POTASSIUM	9.4							24	23		
CARBONATE	0							0	0		
BICARBONATE	485		505			449	449	451	459	508	442
SULFATE	174	1019	1086	1101	1198	1138	1492	1228	1232	1020	908
CHLORIDE	277		696			723	723	707	686	610	495
NITRATE	0.17							0.12	0.06		
FLUORIDE	0.52							0.31	0.34		
SILICA	26							29	27		
TDS	1210							3410	3360		
CONDUCTIVITY	1915	4630	4670	4600	4600	4630	4670	4860	4580	4080	3610
ALKALINITY	386							370	376		
pH (s.u.)	7.59		6.66		6.84	6.91	6.86	7	7.3	6.75	6.82
ARSENIC	0.05							0.002	0.002		
CADMIUM	<.0001							<.0001	0.0001		
IRON	7.7							1.4	1.1	0.89	
LEAD	<.001							<.001	0.001		
MANGANESE	0.15							0.57	0.55		
MERCURY	<.0001							<.0001	0.0001		
MOLY	0.28							7.2	7.3	15	
SELENIUM	0.005							0.035	0.028		
URANIUM	0.014		8.1			6.5	6.5	4.27	3.24	3.95	2.86
AMMONIA	0.105							0.16	0.14		
RADIUM 226 (pCi/l)	12.3							55	73	83	

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

								JANUARY			
PARAMETER	BASELINE 6-30	12-16	12-19	12-21	12-23	12-27	12-30	1-3	1-4	1-6	1-9
CALCIUM	35	260	254	220	210	198	194	208	206	192	182
MAGNESIUM	7.6										
SODIUM	383										
POTASSIUM	9.4										
CARBONATE	0										
BICARBONATE	485	409	431	431	373	373	362	373	386	393	362
SULFATE	174	819	804	745	641	615	606	660	618	622	682
CHLORIDE	277	465	408	410	345	335	337	346	338	312	314
NITRATE	0.17										
FLUORIDE	0.52										
SILICA	26										
TDS	1210										
CONDUCTIVITY	1915	3380	3140	2980	2790	2720	2730	2700	2680	2690	2430
ALKALINITY	386										
pH (s.u.)	7.59	6.96	6.76	6.8	6.83	6.76	6.83	6.74	6.63	6.67	6.9
ARSENIC	0.05										
CADMIUM	<.0001										
IRON	7.7		0.24			0.1		0.01			0.04
LEAD	<.001										
MANGANESE	0.15										
MERCURY	<.0001										
MOLY	0.28		7.7			6.7		3.48			3.8
SELENIUM	0.005										
URANIUM	0.014	3.48	3.58	3.77	3.79	3.67	3.96	4.58	4.78	5.09	5.27
AMMONIA	0.105										
RADIUM 226 (pCi/l)	12.3		63			63		47.3			57

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

										FEBRUARY	
PARAMETER	BASELINE 6-30	1-11	1-13	1-16	1-18	1-20	1-23	1-25	1-27	2-1	2-3
CALCIUM	35	164	158	137	126	117	106	101	99	105	102
MAGNESIUM	7.6										
SODIUM	383										
POTASSIUM	9.4										
CARBONATE	0										
BICARBONATE	485	353	342	342	353	340	329	309	331	331	320
SULFATE	174	517	493	472	322	353	374	331	324	296	324
CHLORIDE	277	286	306	244	225	214	192	180	165	198	179
NITRATE	0.17										
FLUORIDE	0.52										
SILICA	26										
TDS	1210										
CONDUCTIVITY	1915	2380	2240	2150	2020	1944	1698	1570	1550	1730	1685
ALKALINITY	386										
pH (s.u.)	7.59	6.96	6.89	6.89	7	7.01	7.03	7.02	7.06	7.22	6.96
ARSENIC	0.05										
CADMIUM	<.0001										
IRON	7.7			0.06			0.07			0.07	
LEAD	<.001										
MANGANESE	0.15										
MERCURY	<.0001										
MOLY	0.28			3.1			2.6			2	
SELENIUM	0.005										
URANIUM	0.014	5.89	5.81	5.22	4.63	4.09	3.49	3.21	2.87	2.79	2.68
AMMONIA	0.105										
RADIUM 226 (pCi/l)	12.3			54			47			54	

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

PARAMETER	BASELINE 6-30	2-7	2-8	2-10	2-13	2-15	2-17	2-20	2-22	2-24	2-27
CALCIUM	35	94	88	89	74	73	79	69	75	71	72
MAGNESIUM	7.6										
SODIUM	383										
POTASSIUM	9.4										
CARBONATE	0										
BICARBONATE	485	305	293	305	293	282	284	272	284	272	279
SULFATE	174	270	262	303	266	274	270	253	239	221	212
CHLORIDE	277	161	156	161	133	124	128	122	119	119	121
NITRATE	0.17										
FLUORIDE	0.52										
SILICA	26										
TDS	1210										
CONDUCTIVITY	1915	1507	1490	1510	1385	1312	1328	1305	1271	1260	1265
ALKALINITY	386										
pH (s.u.)	7.59	7.07	7.09	7.02	7.1	7.13	7.16	7.2	7.27	7.26	7.15
ARSENIC	0.05										
CADMIUM	<.0001										
IRON	7.7	0.08			0.03						
LEAD	<.001										
MANGANESE	0.15										
MERCURY	<.0001										
MOLY	0.28	1.6			1.3			0.89			
SELENIUM	0.005										
URANIUM	0.014	2.04	2.13	1.98	1.84	1.74	1.44	1.38	1.36	1.53	1.18
AMMONIA	0.105										
RADIUM 226 (pCi/l)	12.3	42			35			30			

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

		MARCH									APRIL
	BASELINE										
PARAMETER	6-30	3-1	3-3	3-6	3-7	3-8	3-10	3-13***	3-20	3-28	4-3
CALCIUM	35	83	68	65		72	65	63	53	64	72
MAGNESIUM	7.6	7.8					4.3				
SODIUM	383	145					81				
POTASSIUM	9.4	5.25					5.1				
CARBONATE	0	0					0				
BICARBONATE	485	230	272	261		261	201	202	179	191	193
SULFATE	174	260	226	228			191	202	154	151	182
CHLORIDE	277	73	115	116		116	70	110	67	81	83
NITRATE	0.17	0.11					0.05				
FLUORIDE	0.52	0.28					0.29				
SILICA	26	11					9				
TDS	1210	747					606				
CONDUCTIVITY	1915	1114	1214	1200		1196	898	1058	816	875	925
ALKALINITY	386	189					165				
pH (s.u.)	7.59	7.47	7.3	7.37		7.16	7.88	7.92	6.66	7.02	7.08
ARSENIC	0.05	0.002					0.001				
CADMIUM	<.0001	0.0001					0.0001				
IRON	7.7	0.02					0.01				
LEAD	<.001	0.001					0.001				
MANGANESE	0.15	0.12					0.05				
MERCURY	<.0001	0.0001					0.0001				
MOLY	0.28	0.62			0.73		0.5	0.79	0.43	0.47	
SELENIUM	0.005	1.7					0.93				
URANIUM	0.014	0.58	1.08	1		0.74	0.51	0.48	0.36	0.56	0.38
AMMONIA	0.105	0.05					0.18				
RADIUM 226 (pCi/l)	12.3	29			28		26	25	26		

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

		MAY							JUNE		
PARAMETER	BASELINE 6-30	4-10	4-18	4-25	5-1	5-8	5-15	5-22	5-30	6-5	6-12
CALCIUM	35	70	82	85	111	101	112	93	101	69	72
MAGNESIUM	7.6										
SODIUM	383										
POTASSIUM	9.4										
CARBONATE	0										
BICARBONATE	485	227	227	219	245	235	231	213	223	222	207
SULFATE	174		197	226	300	297	307	273	332	182	214
CHLORIDE	277	93	90	93	125	140	99	84	93	65	59
NITRATE	0.17										
FLUORIDE	0.52										
SILICA	26										
TDS	1210										
CONDUCTIVITY	1915	963	1058	1051	1261	1151	1288	1103	1204	908	880
ALKALINITY	386										
pH (s.u.)	7.59	7.94	7.57	7.62	7.36	7.57	7.81	7.13	7.79	7.76	7.73
ARSENIC	0.05	0.004					0.003	0.005	0.001	0.005	0.006
CADMIUM	<.0001										
IRON	7.7		0.17	0.13	0.1	0.02					
LEAD	<.001										
MANGANESE	0.15										
MERCURY	<.0001										
MOLY	0.28	0.61	0.57	0.54	0.49	0.64	0.63	0.69	0.75	0.93	0.75
SELENIUM	0.005	0.054	0.009	0.012	0.001	0.002	0.005	0.024	0.033	0.007	0.005
URANIUM	0.014	0.39	0.37	0.38	0.36	0.6	0.31	0.66	0.63	0.25	0.29
AMMONIA	0.105										
RADIUM 226 (pCi/l)	12.3	26	33	40	42	33	35	24	35	27	29

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

JULY

PARAMETER	BASELINE 6-30	6-19	6-27	7-5	7-10	7-17	7-24	7-31	8-7	8-14	8-21
CALCIUM	35	72	72	76	68	67	66	66	69	69	70
MAGNESIUM	7.6										
SODIUM	383										
POTASSIUM	9.4										
CARBONATE	0										
BICARBONATE	485	200	197	233	233	209	220	230	210	213	224
SULFATE	174	238	192	223	199	199	195	189	196	203	214
CHLORIDE	277	66	55	65	41	42	62	48	61	56	66
NITRATE	0.17										
FLUORIDE	0.52										
SILICA	26										
TDS	1210										
CONDUCTIVITY	1915	933	917	953	831	849	922	877	918	901	949
ALKALINITY	386										
pH (s.u.)	7.59	7.78	7.6	7.6	8.05	7.85	7.79	7.98	7.96	7.92	7.97
ARSENIC	0.05	0.006			0.011				0.004		
CADMIUM	<.0001										
IRON	7.7										
LEAD	<.001										
MANGANESE	0.15										
MERCURY	<.0001										
MOLY	0.28	0.86			0.94				0.98		
SELENIUM	0.005	0.005			0.007				0.002		
URANIUM	0.014	0.29	0.29	0.31	0.21	0.19	0.32	0.42	0.22	0.2	0.19
AMMONIA	0.105										
RADIUM 226 (pCi/l)	12.3	26			25						

KVD RESTORATION DEMONSTRATION
AVERAGE ANALYTICAL RESULTS

PARAMETER	BASELINE 6-30	8-29	9-6	9-11	9-18	9-25
CALCIUM	35	66	68	63	65	69
MAGNESIUM	7.6					
SODIUM	383					
POTASSIUM	9.4					
CARBONATE	0					
BICARBONATE	485	232	225	229	232	258
SULFATE	174	194	190	212	199	226
CHLORIDE	277	62	90	80	106	109
NITRATE	0.17					
FLUORIDE	0.52					
SILICA	26					
TDS	1210					
CONDUCTIVITY	1915	970	1036	1032	1109	1132
ALKALINITY	386					
pH (s.u.)	7.59	7.88	7.75	7.79	8.02	8.12
ARSENIC	0.05					
CADMIUM	<.0001					
IRON	7.7					
LEAD	<.001					
MANGANESE	0.15					
MERCURY	<.0001					
MOLY	0.28					
SELENIUM	0.005					
URANIUM	0.014	0.3	0.22	0.28	0.32	0.38
AMMONIA	0.105					
RADIUM 226 (pCi/l)	12.3					

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January 29, 1991

Mr. Dale Kohler
Ground Water Conservation Section
Texas Water Commission
8900 Shoal Creek, Suite 322
Austin, Texas 78756

Dear Mr. Kohler:

Pursuant to our telephone conversation today, attached is a summary of the additional items that the EPA needs for the Aquifer Exemption Extension of the Kingsville Dome Project.

1. Information sufficient to establish the degree of hydraulic communication between the URI site and the drinking water supply wells of Kingsville and Ricardo (i.e. cross-section displaying Goliad Formation with water well completions illustrated).

Attachment "A" is a regional correlation of shallow geologic units from the Texas Water Commission Report #173, which includes the approximate location of both the city of Ricardo and kingsville and the Kingsville Dome Mine site. Kingsville is located in between data point #110 and #701, Ricardo is located between data point #604 and #701. The Kingsville Dome mine is located very near data point #701.

As with that portion of the Goliad land presently being mined, the extended Aquifer Exemption is four miles east and downdip of the city of Ricardo, and seven miles southeast and on strike with the city of Kingsville. The exempted portion of the Goliad Sand is located as such that it will not have an effect on the quality or quantity of water in either city.

2. Information used to determine pre-mining ground water velocity of 10 to 20 feet/year (described in submitted technical report).

Background ground water velocities in the Texas Gulf Coast Aquifer of 10 to 20 feet/year are commonly described in the literature. Attachment "B" contains a memorandum from URI's consultant providing the basis for the groundwater velocity in the location of the Kingsville Dome mine, which is stated therein as 17 feet per year. This is between the 10 and 20 feet per year which was described within the technical report.

3. A summary of comments received during the public comment period, including the comments received during the public hearing and a copy of the response to comments. (Also a a copy of the PFD).

According to Texas administration procedures, unsworn public testimony is heard at the beginning of all public hearings including the one which was conducted for the Kingsville Dome expansion. This information is reviewed by the Hearings Examiner who prepares the Proposal for Decision (PFD) at the end of the hearing procedure. The PFD is therefore a comprehensive summary of all public comments, sworn and unsworn. Attachment "C" contains both the unsworn public comments, which were presented at the beginning of the Kingsville Expansion hearing and the Hearings Examiner's PFD.

4. A list of water supply wells within the exempted area and less than one quarter mile from the exempted area boundaries. The following information should be included, if available:

A. Well depth
B. Screen interval (depth, aquifer name, etc.)
C. Use (e.g.. irrigation, domestic, etc.)
D. Approximate pumpage.

The list of wells is within Attachment "D".

5. A map showing the regional ground water gradient. This map should encompass the URI site and the Kingsville/Ricardo area. It should also be able to be correlated to the information in No. 1 and include control points on the map.

Attachment "B" contains a regional map which shows the approximate water level in the Goliad sand, which is also the geologic interval being mined. While this map shows a regional sink toward the City of Kingsville, it is worthy to note that the bleed which is maintained during operation effectively reverses that gradient in the mine area so that all waters in the vicinity during mining are flowing in toward the mine.

6. Appendix VII of the technical report contains information regarding artificial penetrations. The information in Appendix VII does not describe how it was determined that these penetrations are properly constructed or plugged to prevent the movement of fluids out of the exemption limits. TWC should describe how it was determined that these wells were properly constructed or plugged to prevent injected fluid movement.

The plugging of all artificial penetrations except two was documented through a careful review of all Texas Railroad Commission (TRC) records. The two wells without plugging documented may or may not have been plugged; however, TRC records were not available for review. If these holes were not intentionally plugged with cement there are several other overriding factors which should be considered which would prevent injection fluid movement.

First, the mud which was used to drill all artificial penetrations in the geographic area normally acts as a plugging media. This was demonstrated during the review process for this matter. This is especially true for Class III wells such as the subject wells because the bleed creates a net withdrawal of water on a wellfield basis.

Second, *in situ* miners are required to conduct hydrological tests on site specific areas before injection can begin. Said tests must demonstrate that the overlying and underlying zones are confined so that the mining and injection activity will be confined to the intended zone. Such has been the case in the vicinity of penetration #9, which is missing the cementing records and will be for penetration #24.

Please feel free to contact me if you have any further questions pertaining to this subject.

Very truly yours,

Mark S. Pelizza
Environmental Manager

MSP/dlg
Encl.