

Class III Wells

EPA Region 6

Brian Graves

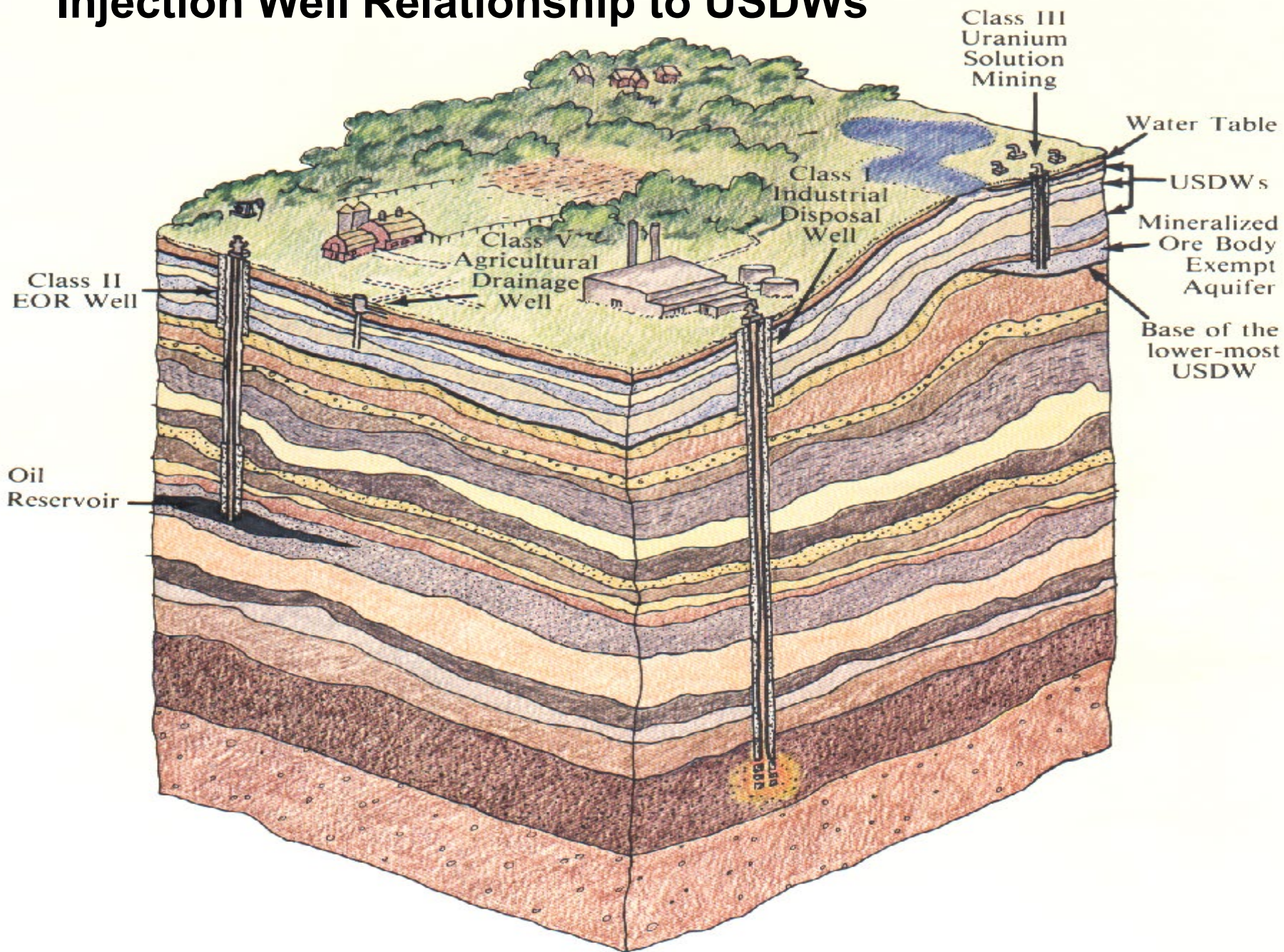
UIC Land Ban Coordinator

(214) 665-7193

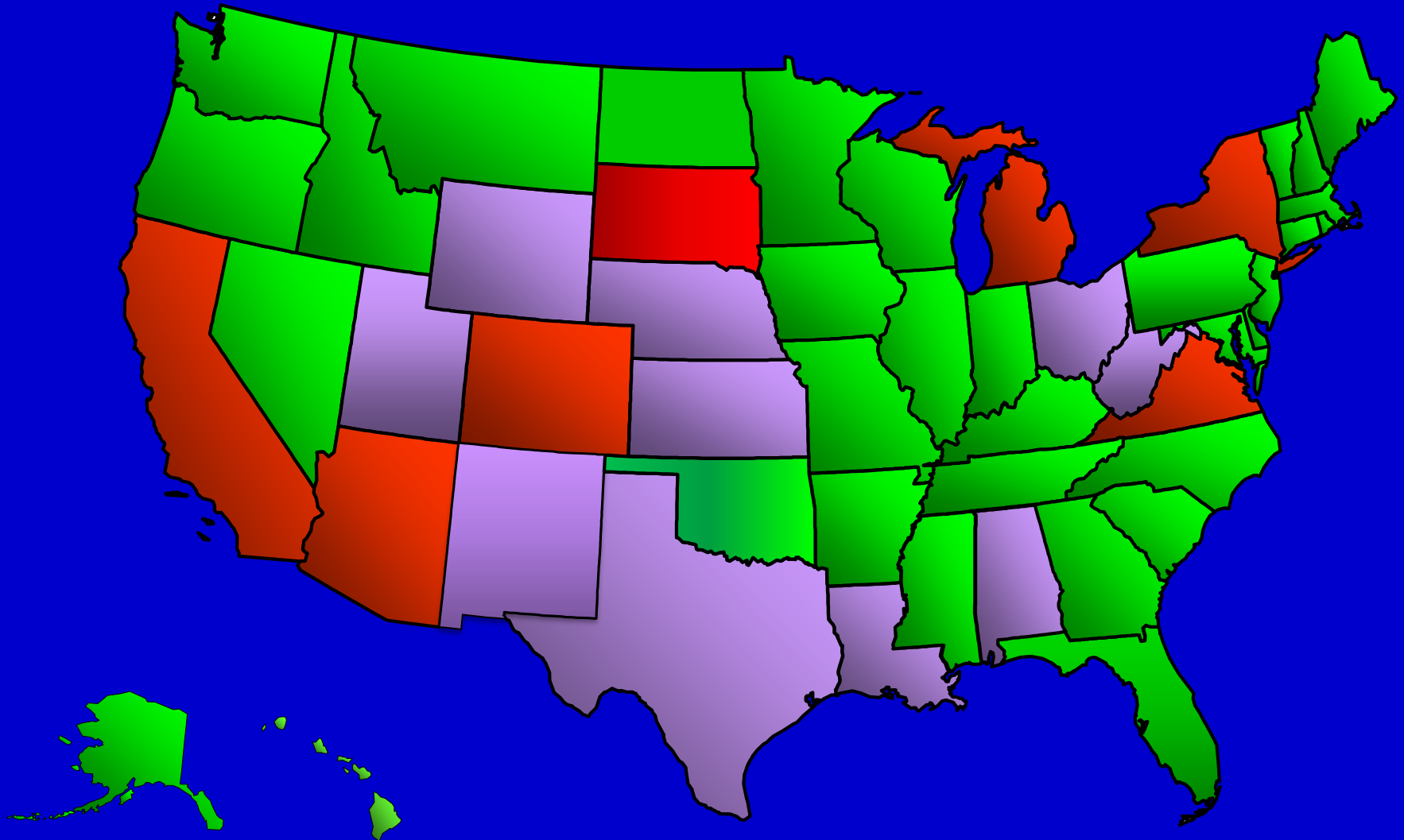
graves.brian@epa.gov




Injection Well Relationship to USDWs




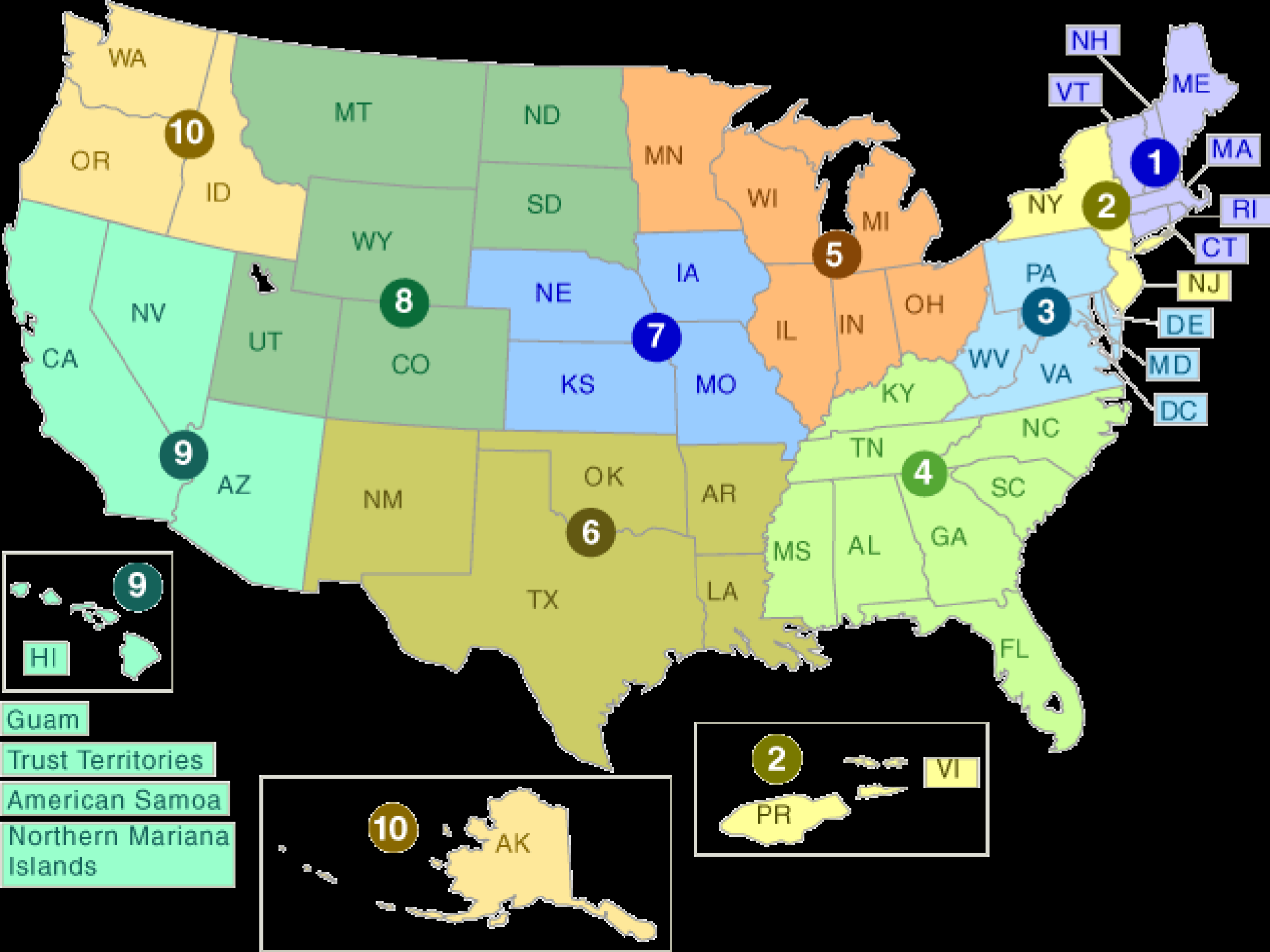
States With Class III Injection Wells



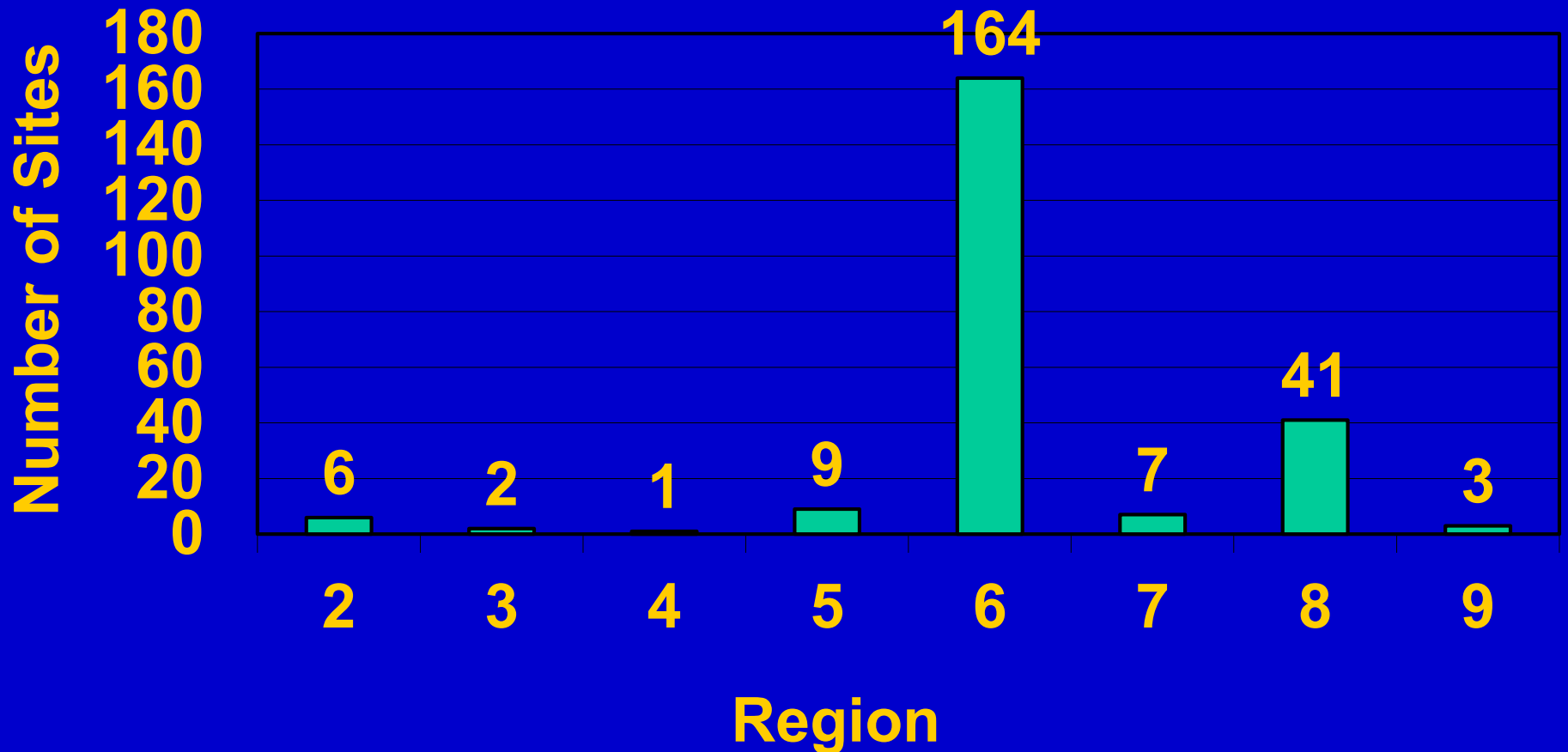
 **Primacy States
with Class III
Injection Wells**

 **Direct Implementation
States with Class III
Injection Wells**

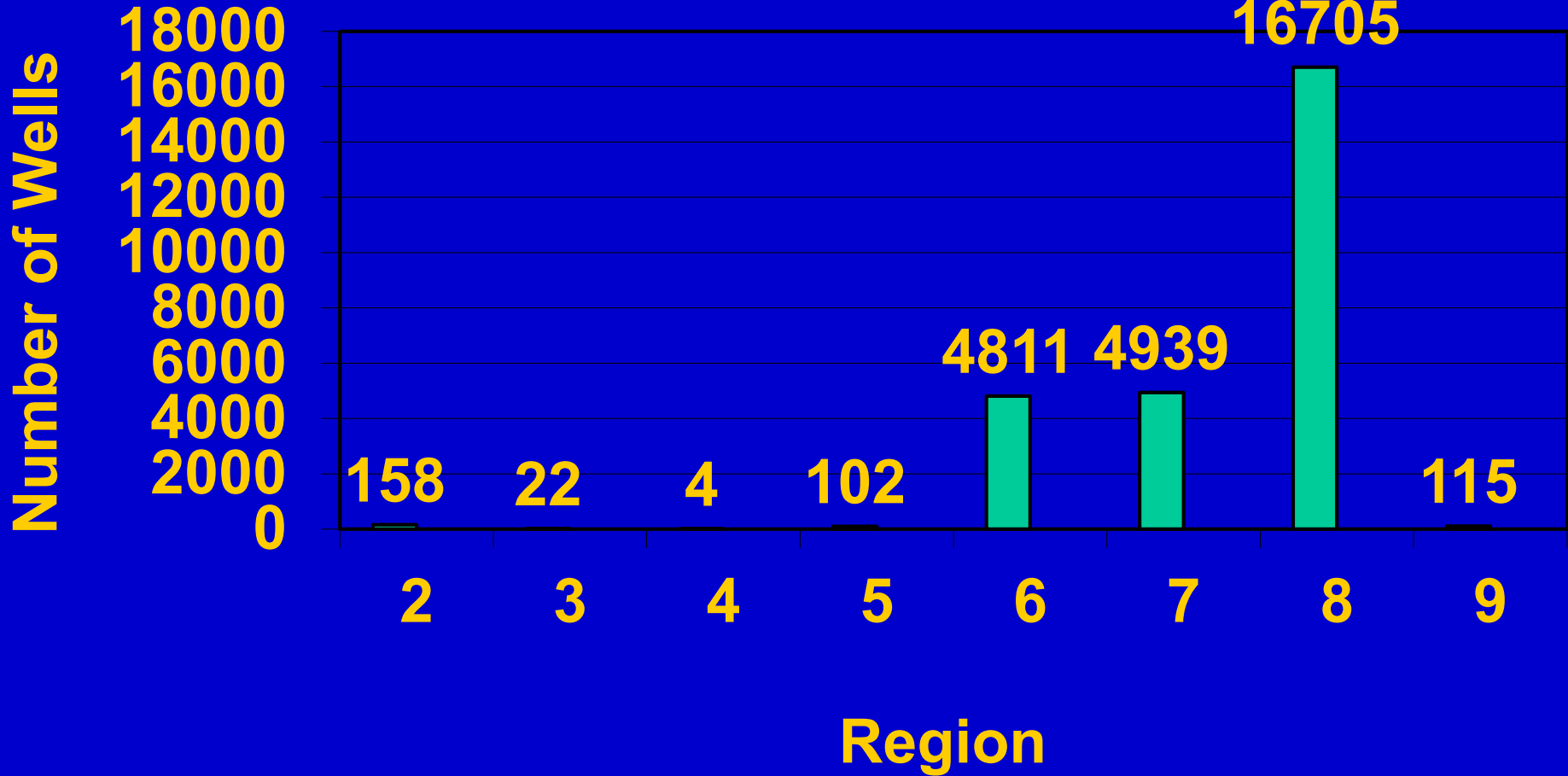
 **States with no
Class III
Injection Wells**



Class III Well Sites



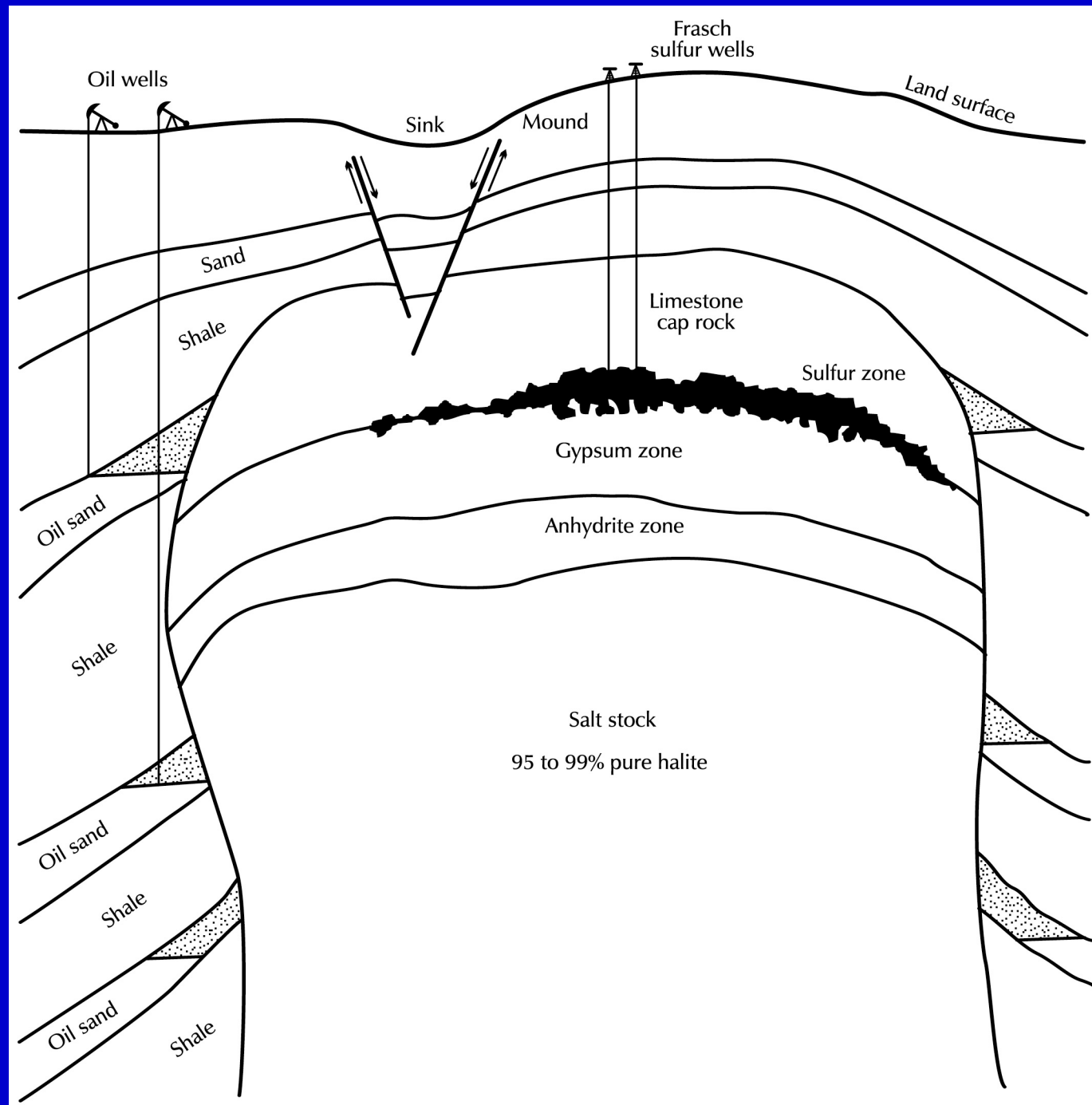
Class III Wells

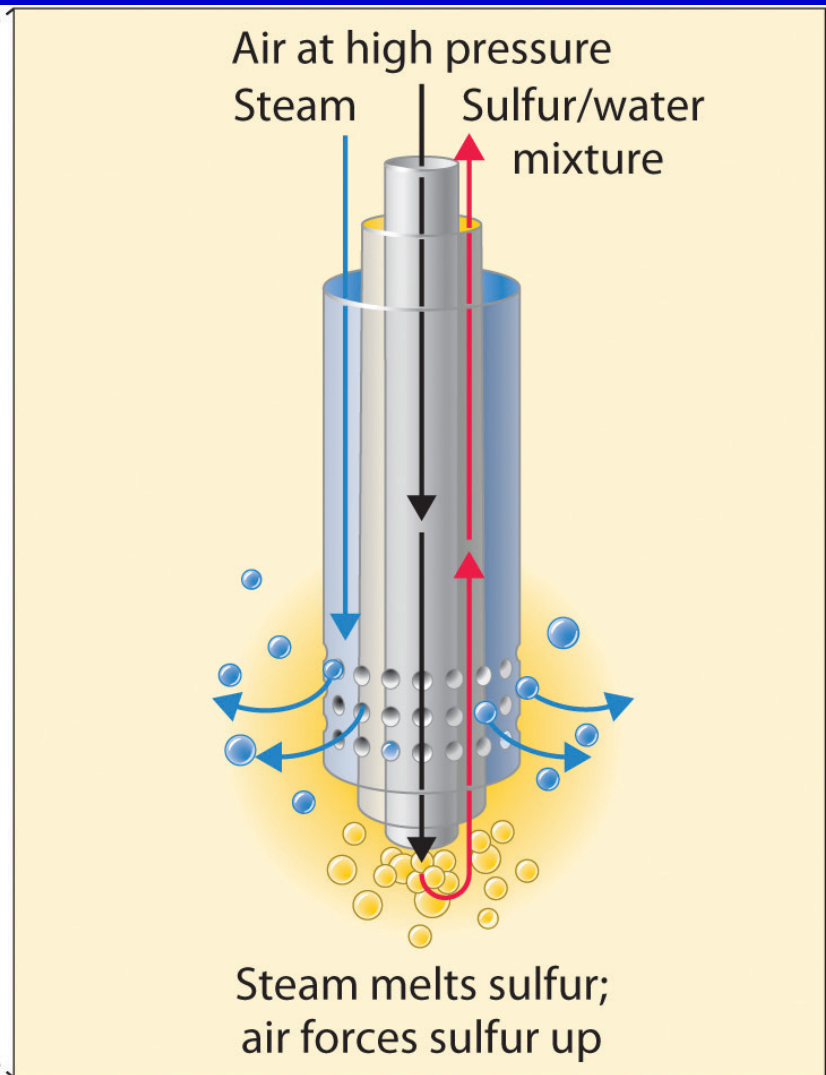
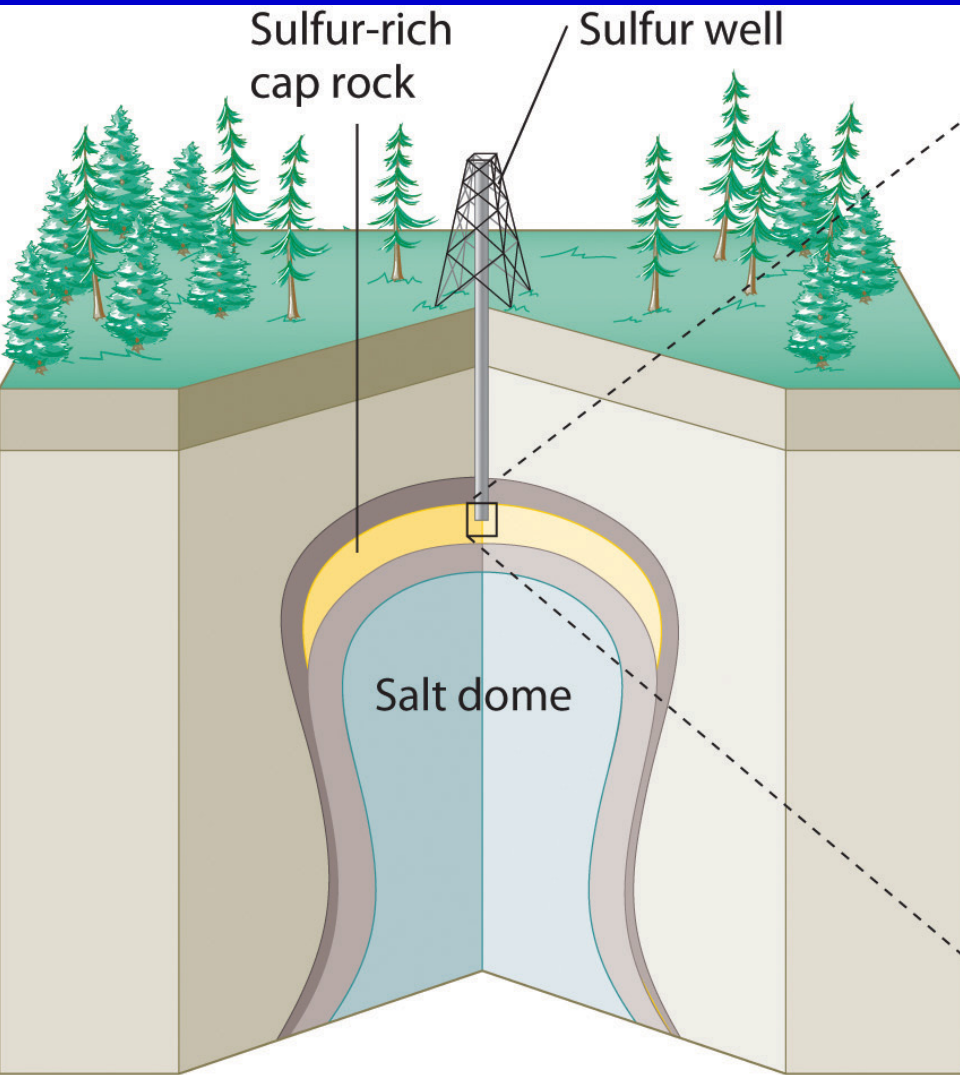


Sulfur

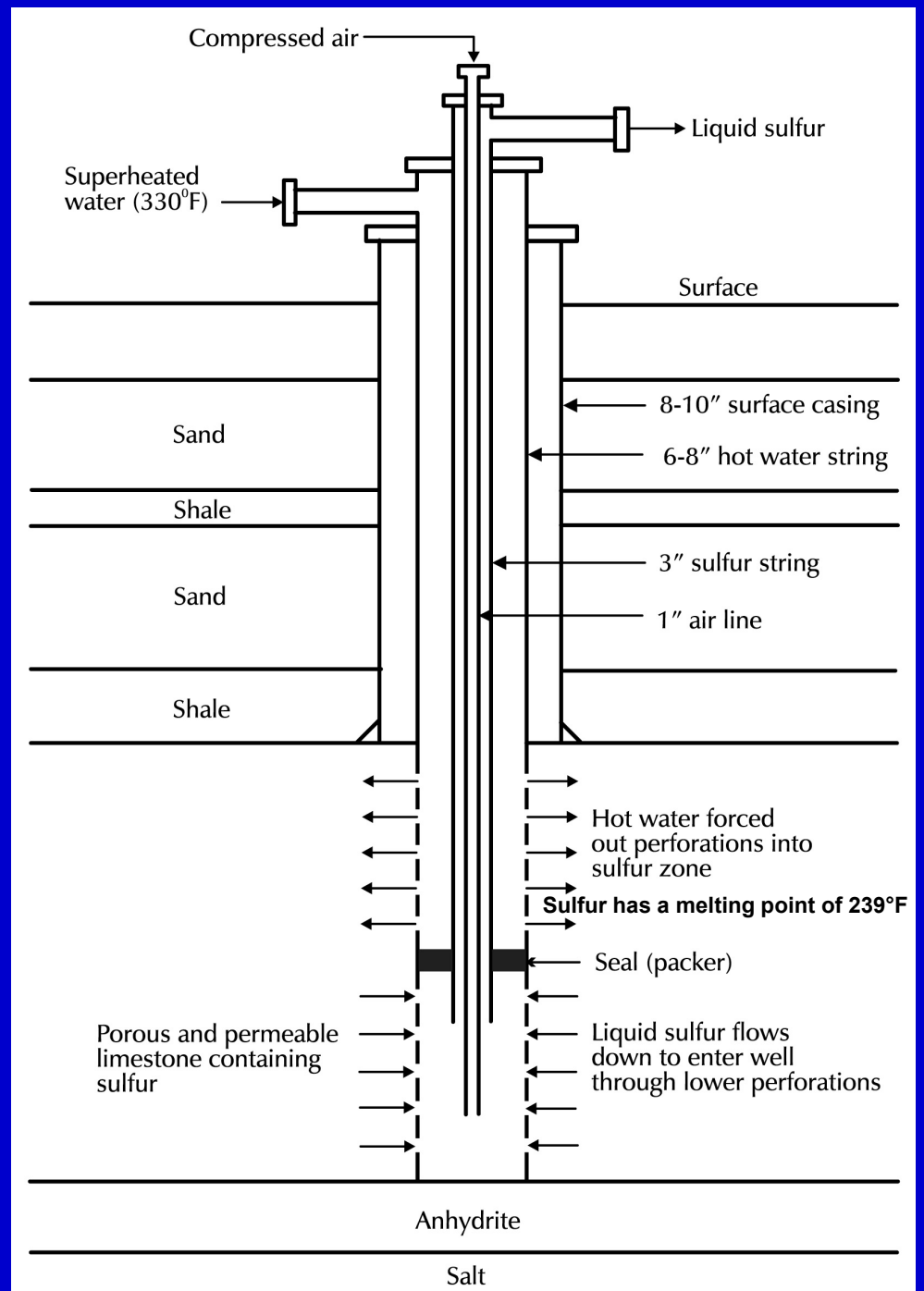
Mining

Generalized Cross Section of a Salt Dome





Frasch Sulfur Well



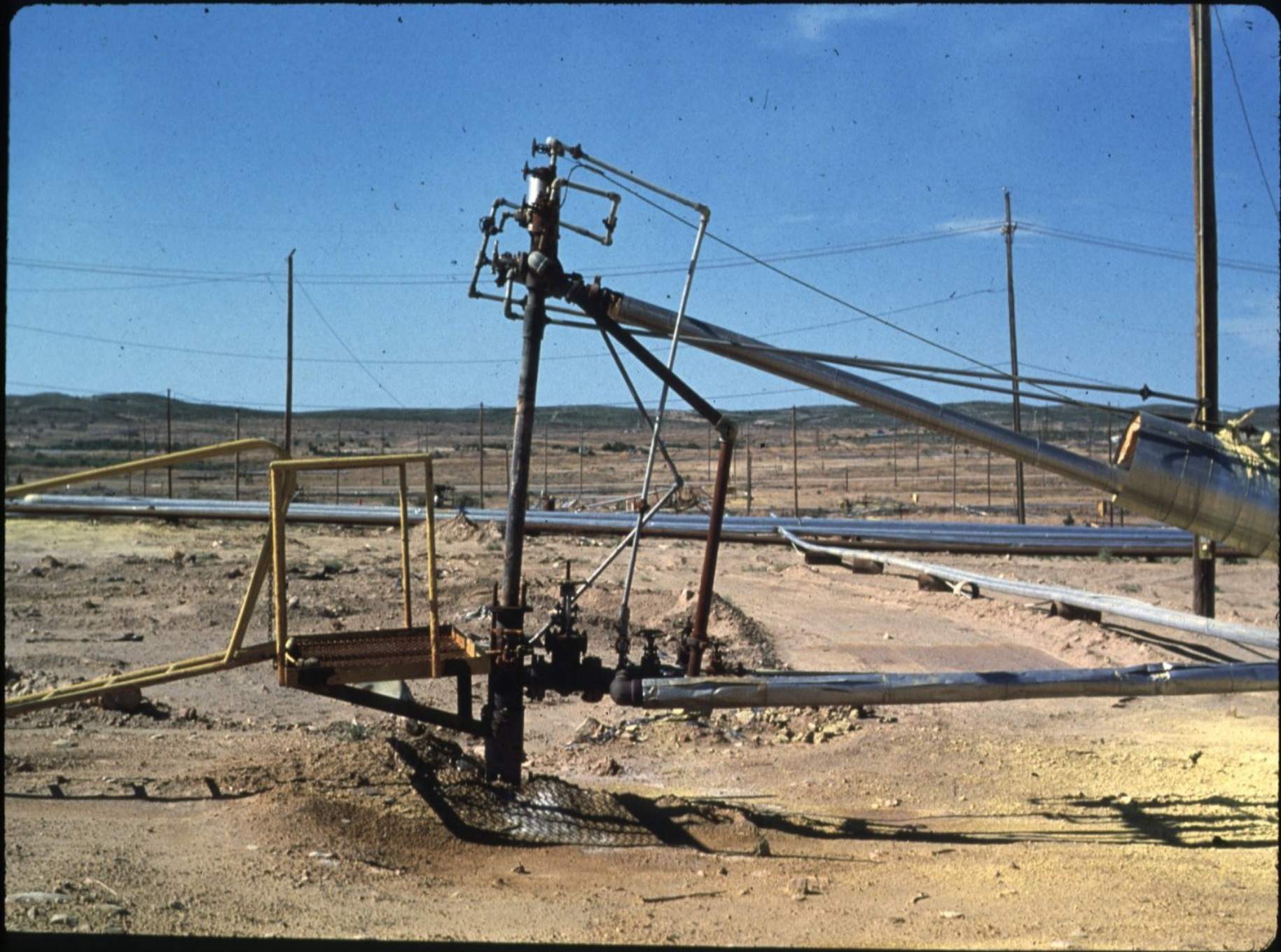














Surface Subsidence of 53 feet



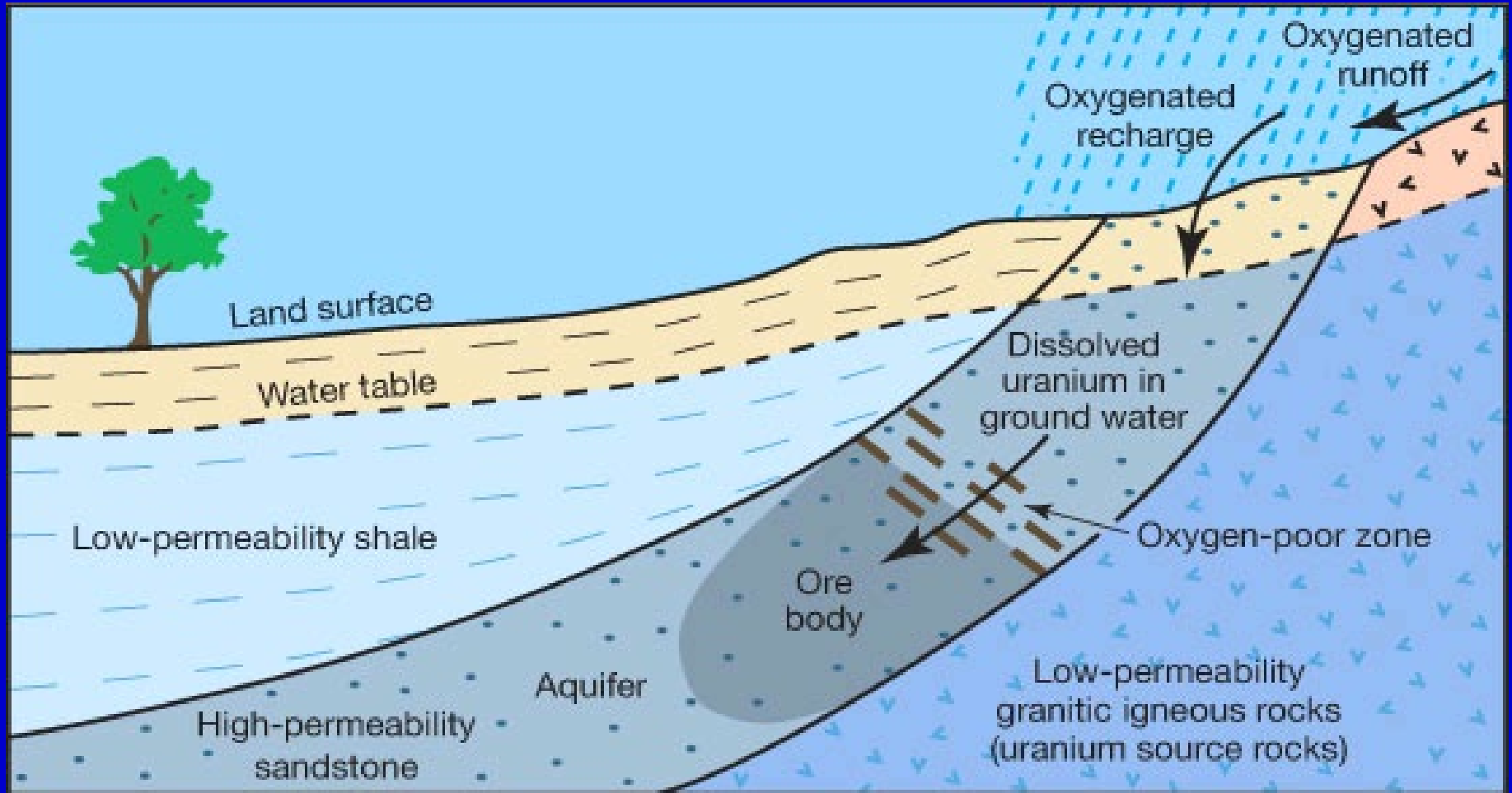
Processed Sulfur in Several Forms



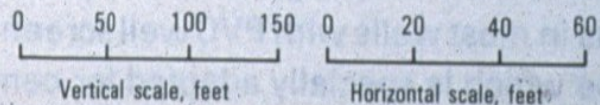
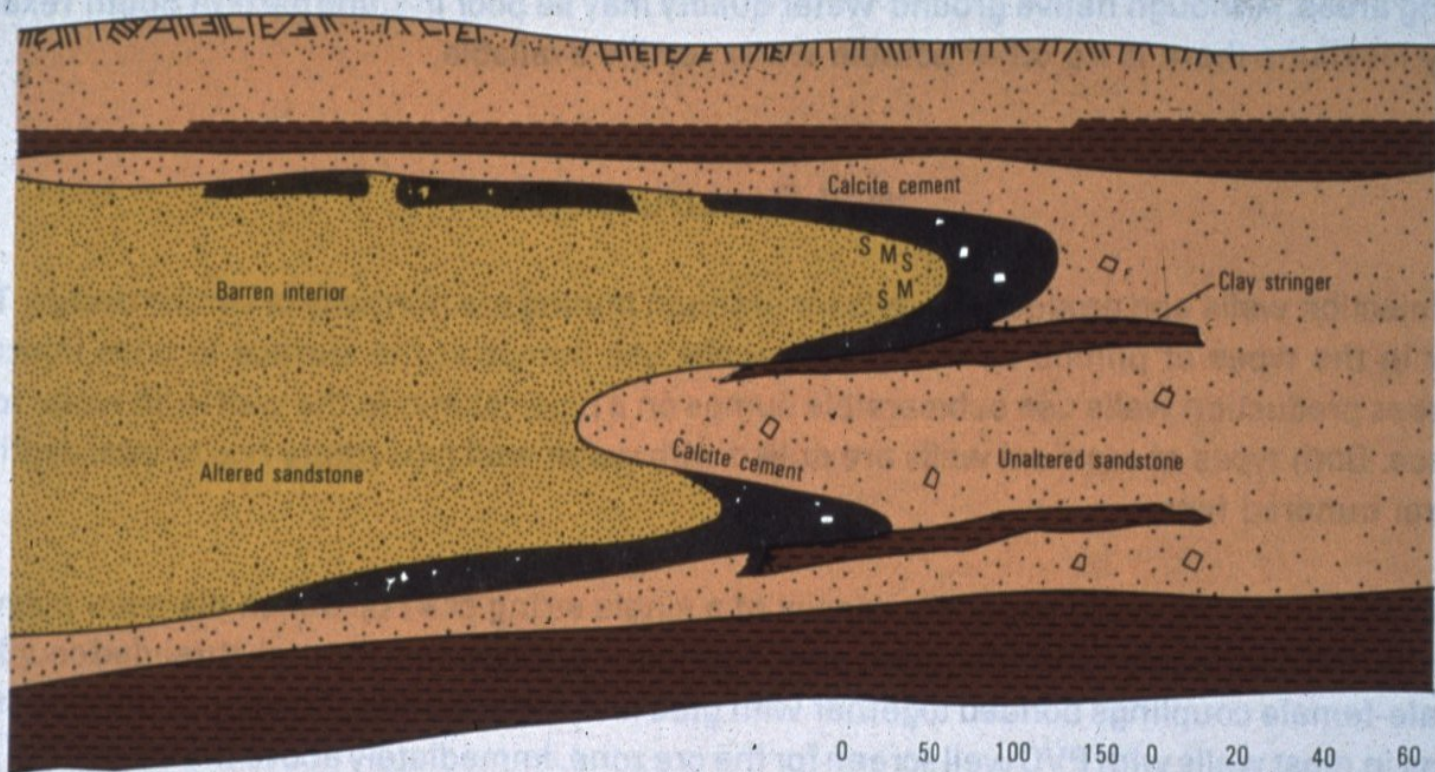
Uranium





Mining

Uranium Deposition



IDEALIZED URANIUM ROLL FRONT DEPOSITS




	Oxidized Barren Interior
	Unaltered Sandstone
	Siltstone or Claystone
	Uranium Mineralization

 **Selenium Molybdenum**

Selenium Molybdenum

 **ERRATIC**

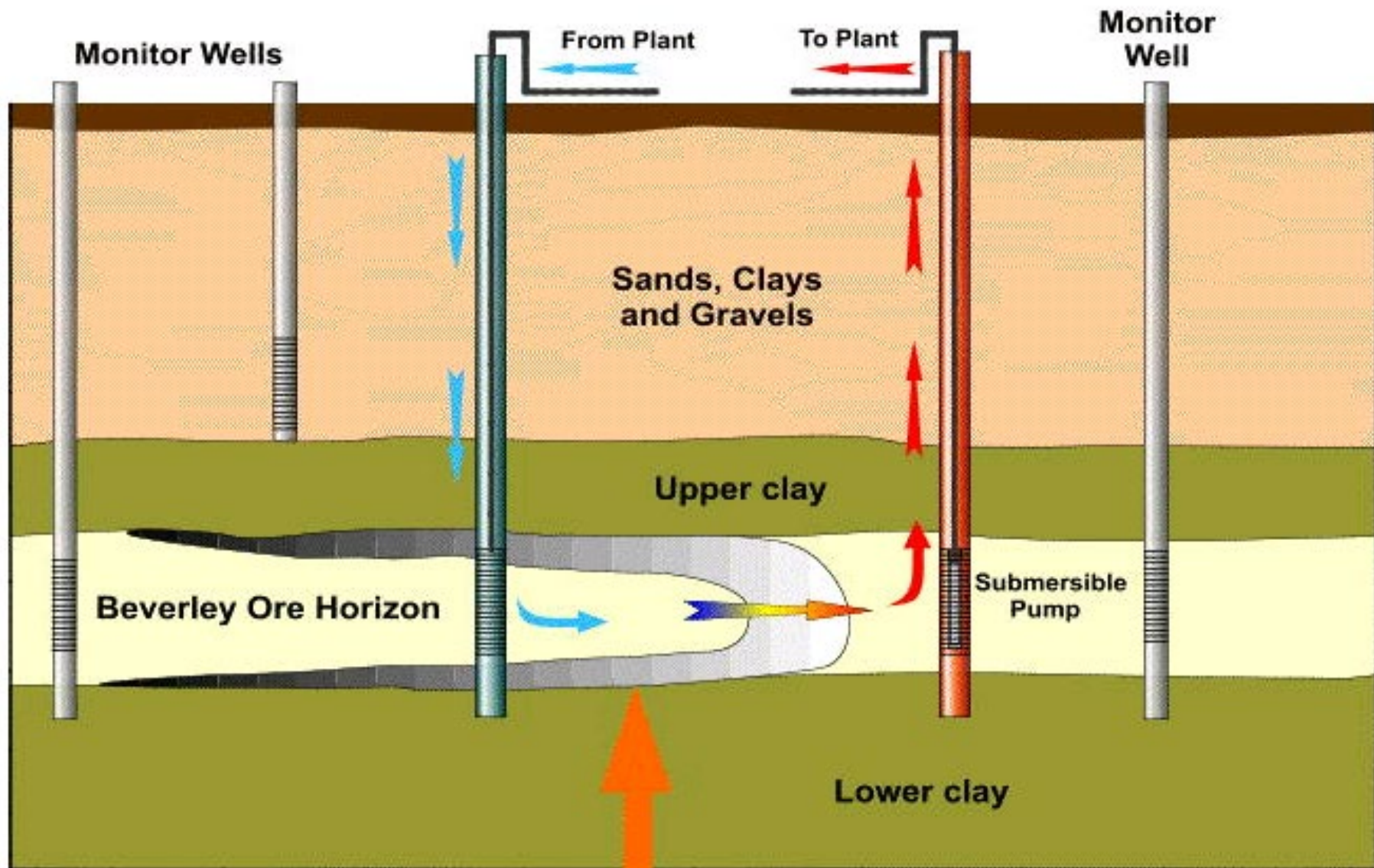
 **Pyrite**

Pyrite

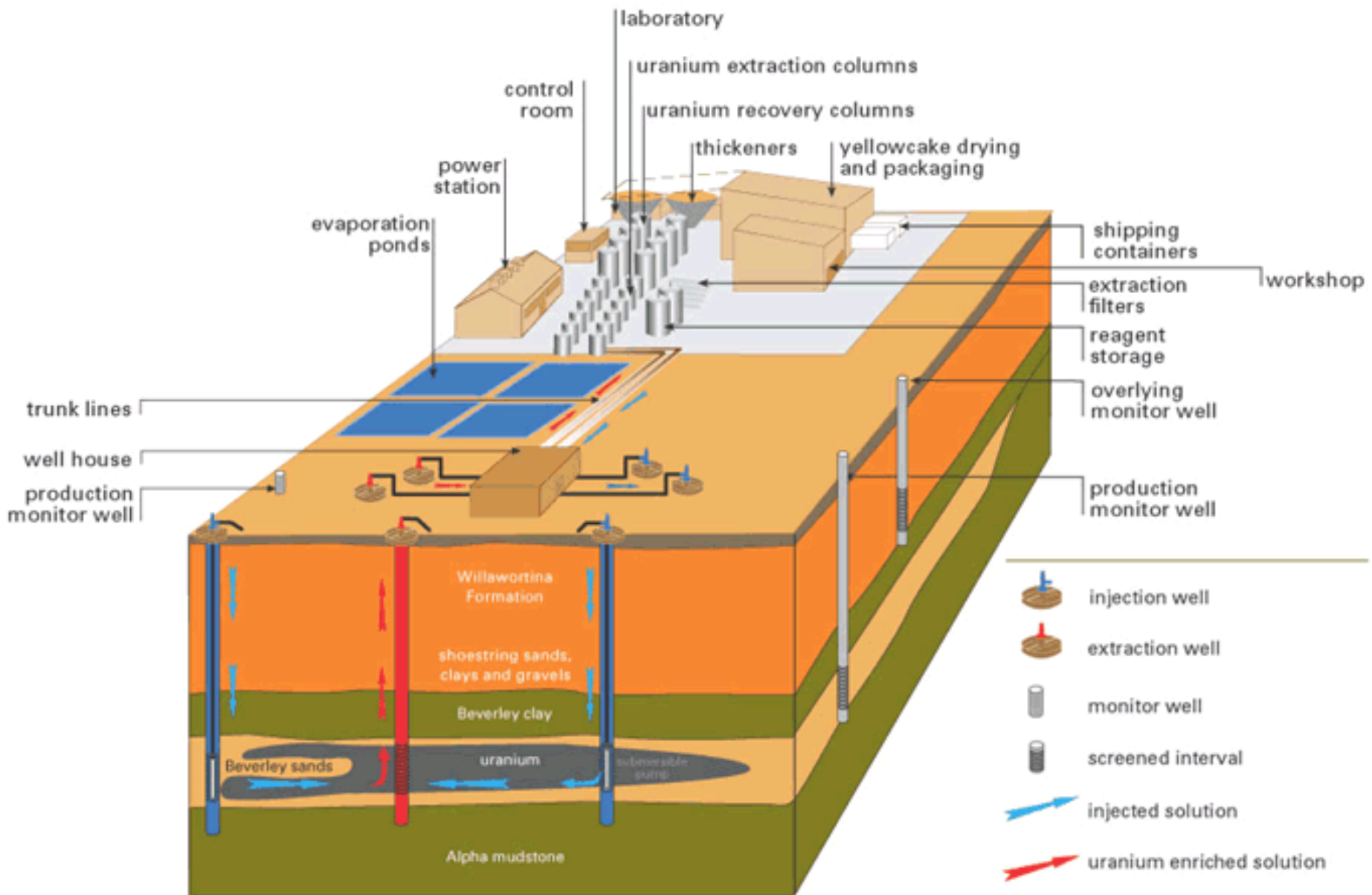
Roll Front Uranium Deposit



- **In situ leach (ISL) uranium mining was first tried on an experimental basis in Wyoming during the early 1960s.**
- **The first commercial mine began operating in 1974.**
- **In 2018 50% of world uranium mined was from ISL operations. Today most US uranium production comes from ISL mining.**
- **Several projects are licensed to operate in Wyoming , Nebraska and Texas. They are small (under 1000 t/yr) but they supply most of the US uranium production. Currently the Texas and Nebraska mines are on standby.**



Uranium Deposit



Lease Boundary

Permit Area

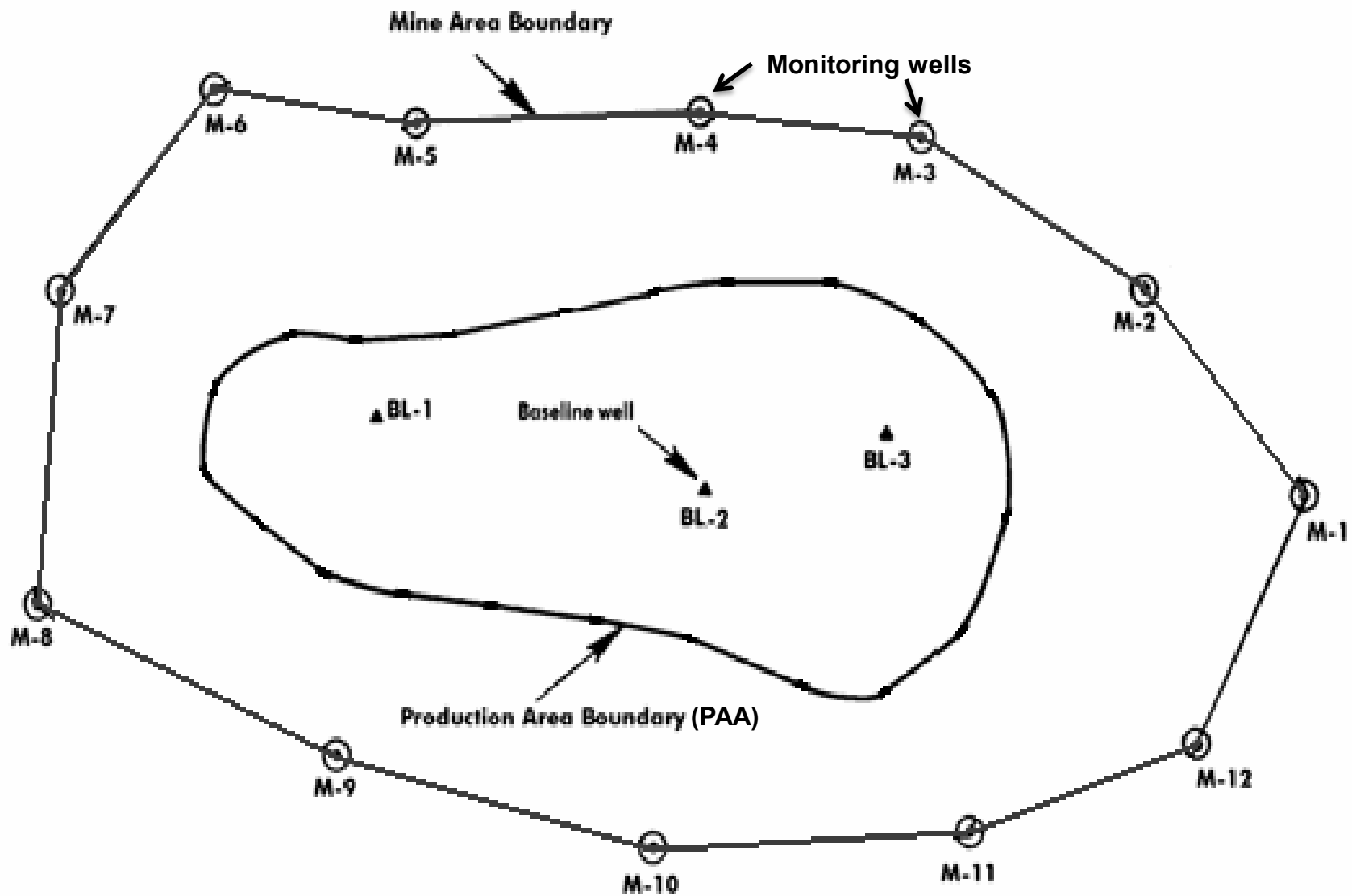


Waste Disposal Well

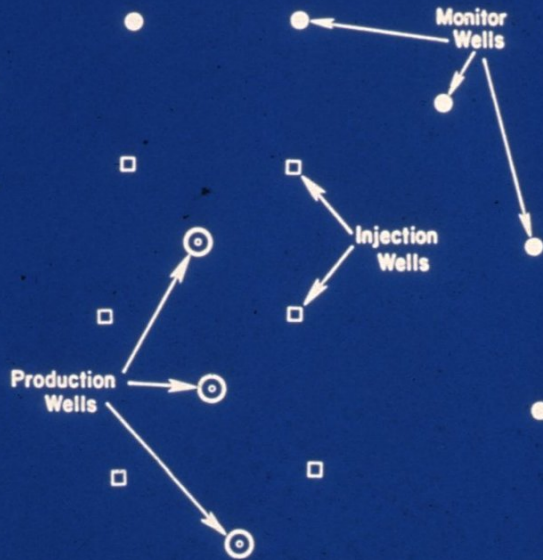


Production Area Authorizations (PAA)

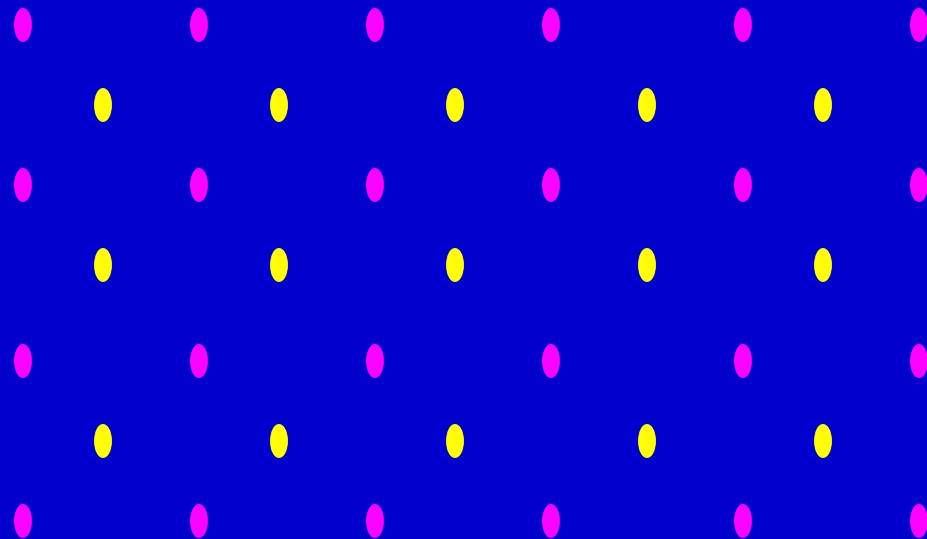
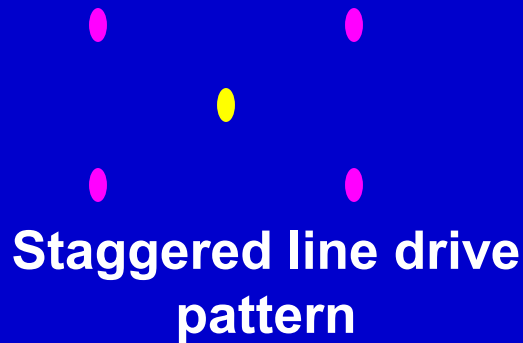
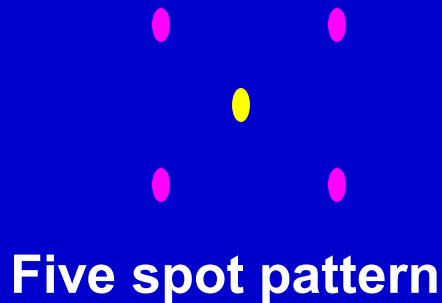




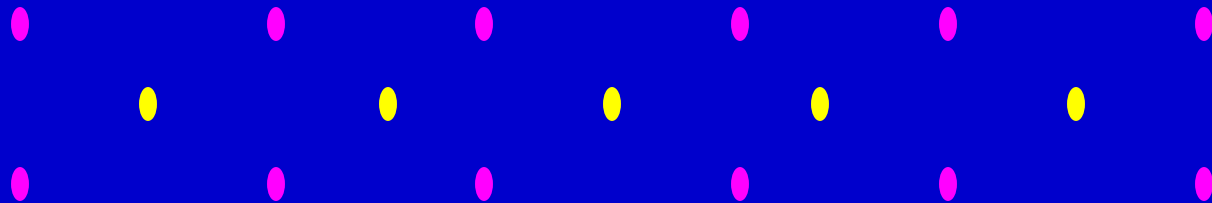
Generalized In-Situ Uranium Mine Plan



Common Patterns of Injection and Production Wells



Multiple five spot pattern



Multiple staggered line drive pattern





In situ wellfield with numerous injection and extraction wells

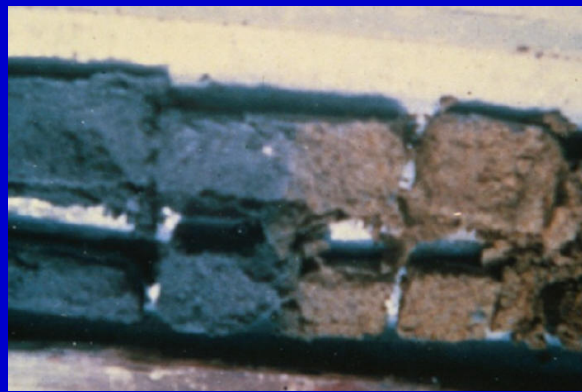


Open Pit Uranium Mine



Drilling Rigs

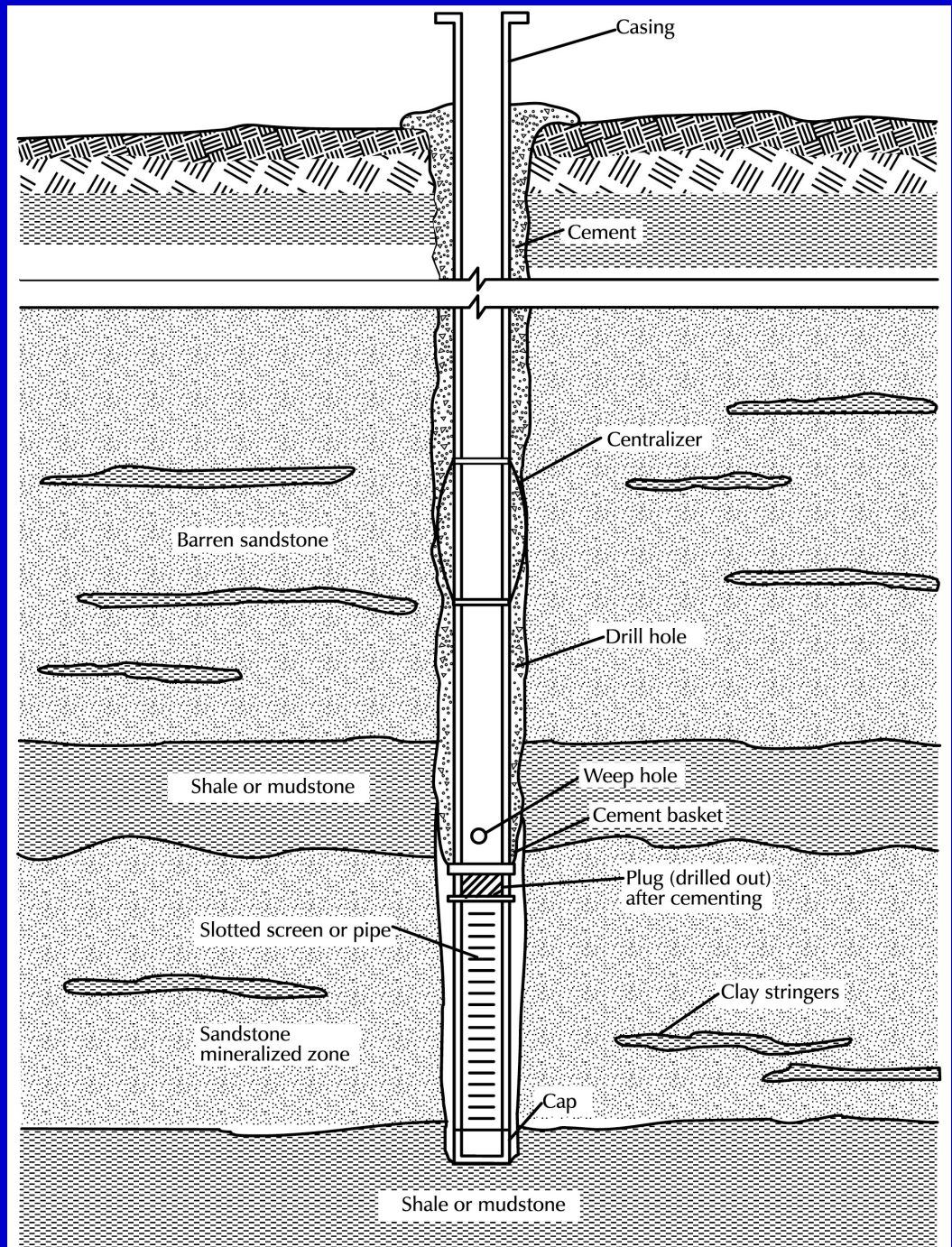
Well Core



Drill Cuttings

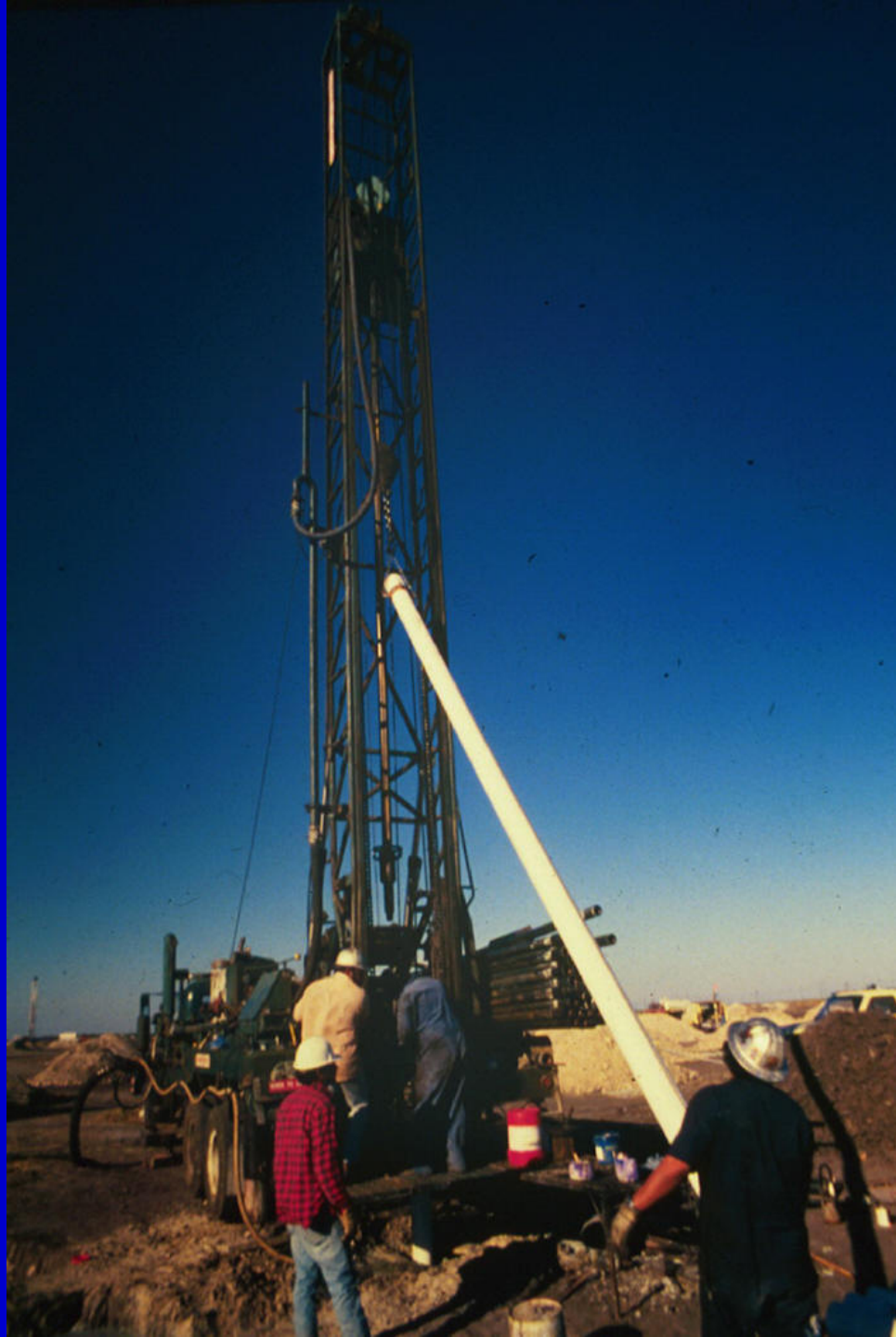


Uranium Mining Well





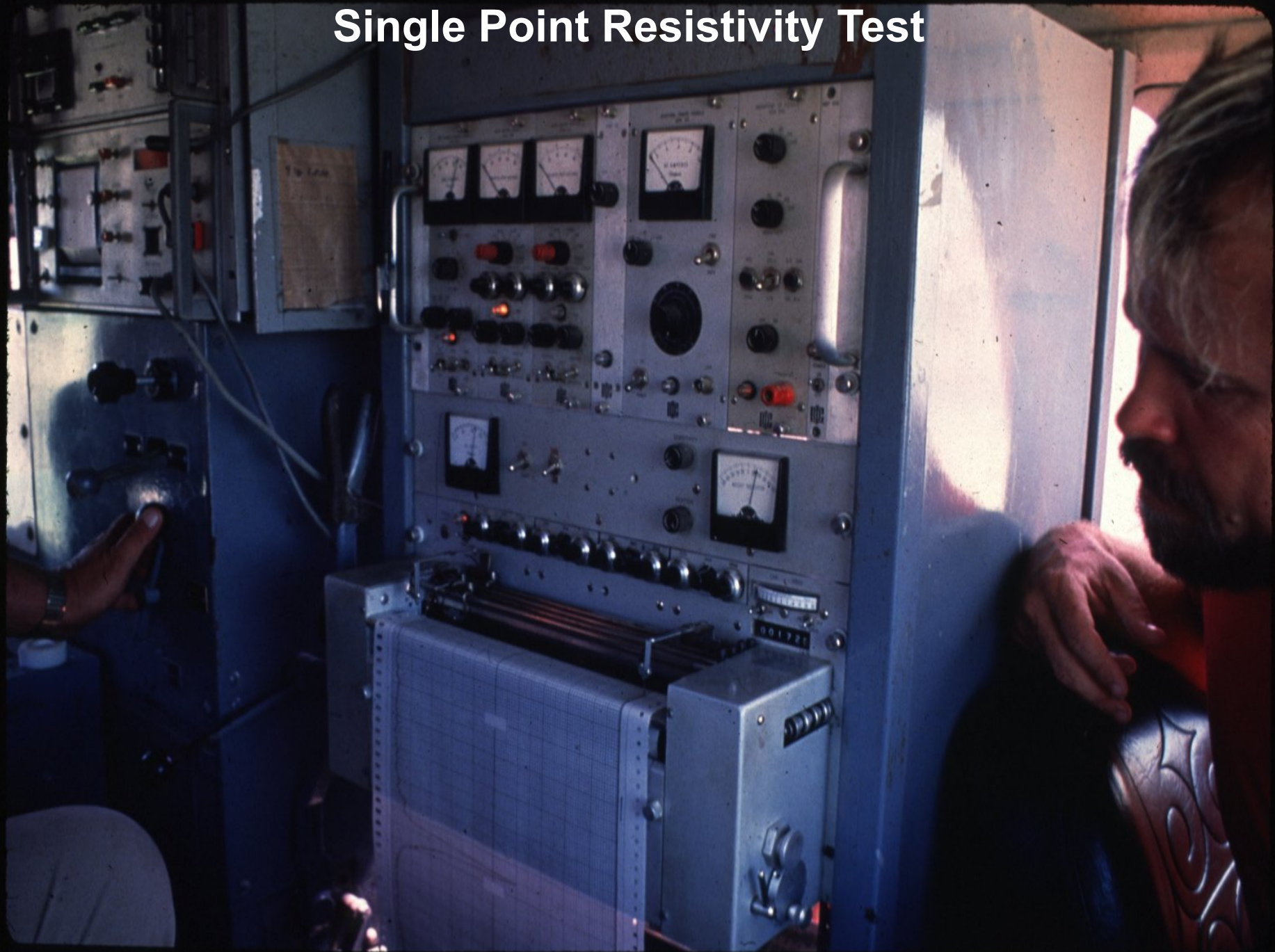






Single Point Resistivity wireline truck

Single Point Resistivity Test





**Testing a Well
to Make Sure it
Will Produce Water**



Flow Lines and Meters

Uranium Mining **Class III Injection** and **Production** Wells



























Reverse Osmosis Equipment

- **After recovery of the uranium, the barren solution may be run through a reverse osmosis process and it is then re-fortified with oxidant before being returned to the wellfield via the injection wells.**
- **A small flow (about 0.5%) is bled off to maintain a pressure gradient in the wellfield and this, with some solutions from surface processing, is treated as waste. This waste water contains various dissolved ions such as chloride, sulfate, sodium, radium, arsenic and iron from the orebody.**
- **This bleed of process solution ensures that there is a steady flow into the wellfield from the surrounding aquifer, and serves to restrict the flow of mining solutions away from the mining area.**

Liquid Oxygen Storage Tank







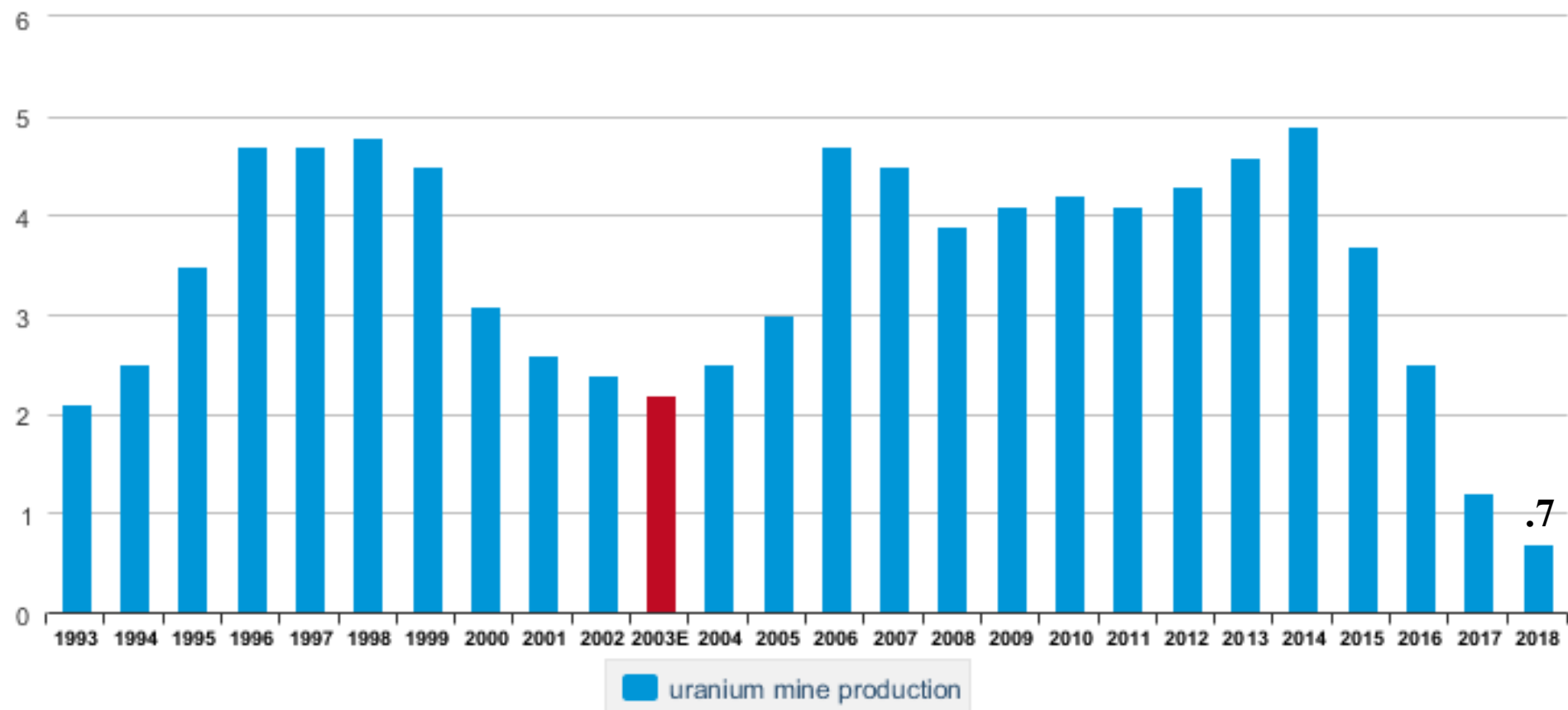
Uranium Price \$/pound



SOURCE: TRADINGECONOMICS.COM | OTC

U.S. mine production of uranium, 1993–2018

million pounds U3O8



Sources: U.S. Energy Information Administration 1993-2002-Uranium Industry Annual 2002 (May 2003), Table H1 and Table 2.

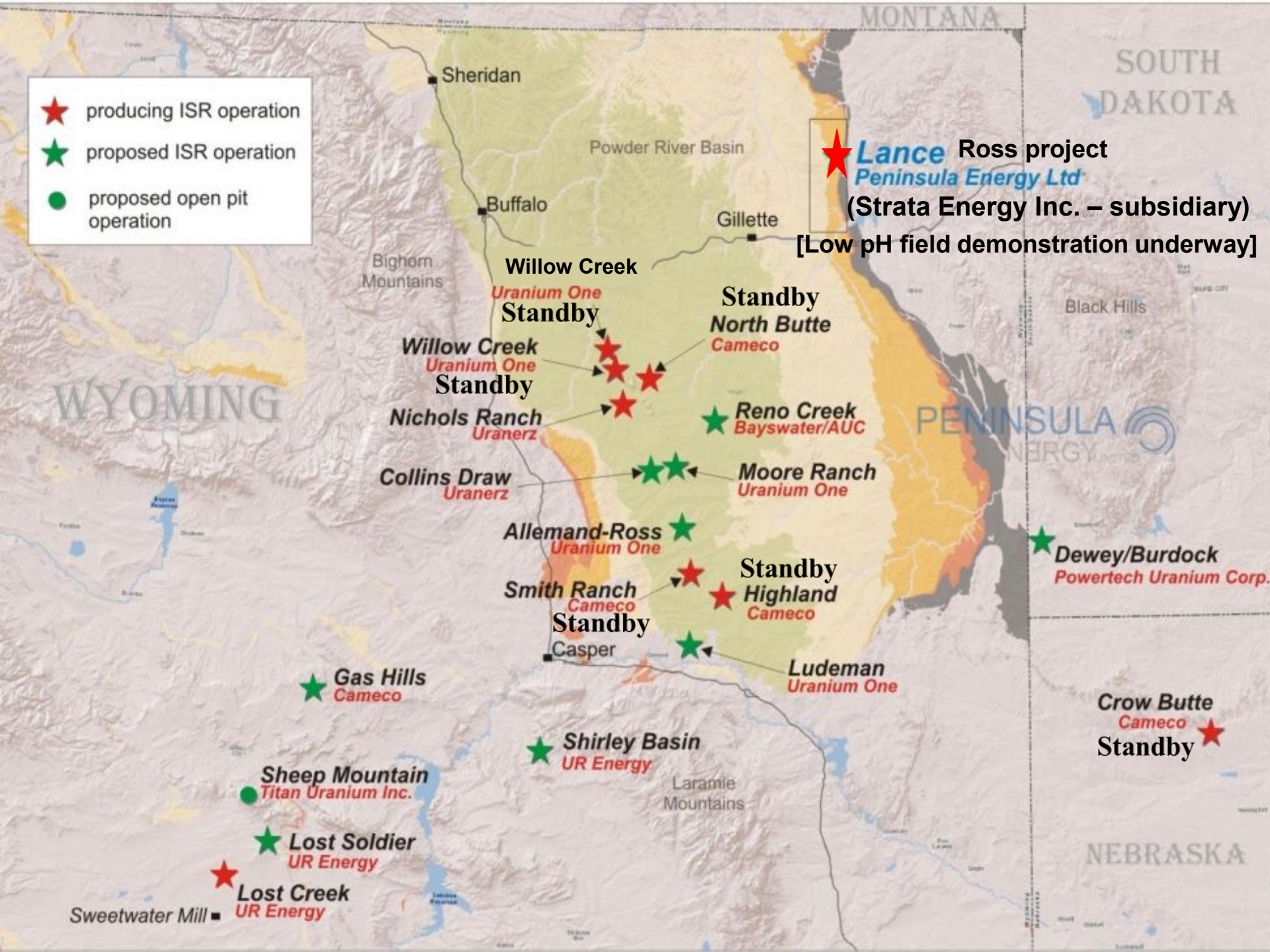
2003-2018 data from Form EIA-851A, *Domestic Uranium Production Report* (2003–18).

E= estimated data.



- ★ producing ISR operation
- ★ proposed ISR operation
- proposed open pit operation

★ **Lance Ross project**
Peninsula Energy Ltd
 (Strata Energy Inc. – subsidiary)
 [Low pH field demonstration underway]



Peninsula (Strata Energy) Lance Ross Project



Wellfields and Header Houses - Mine Unit 1

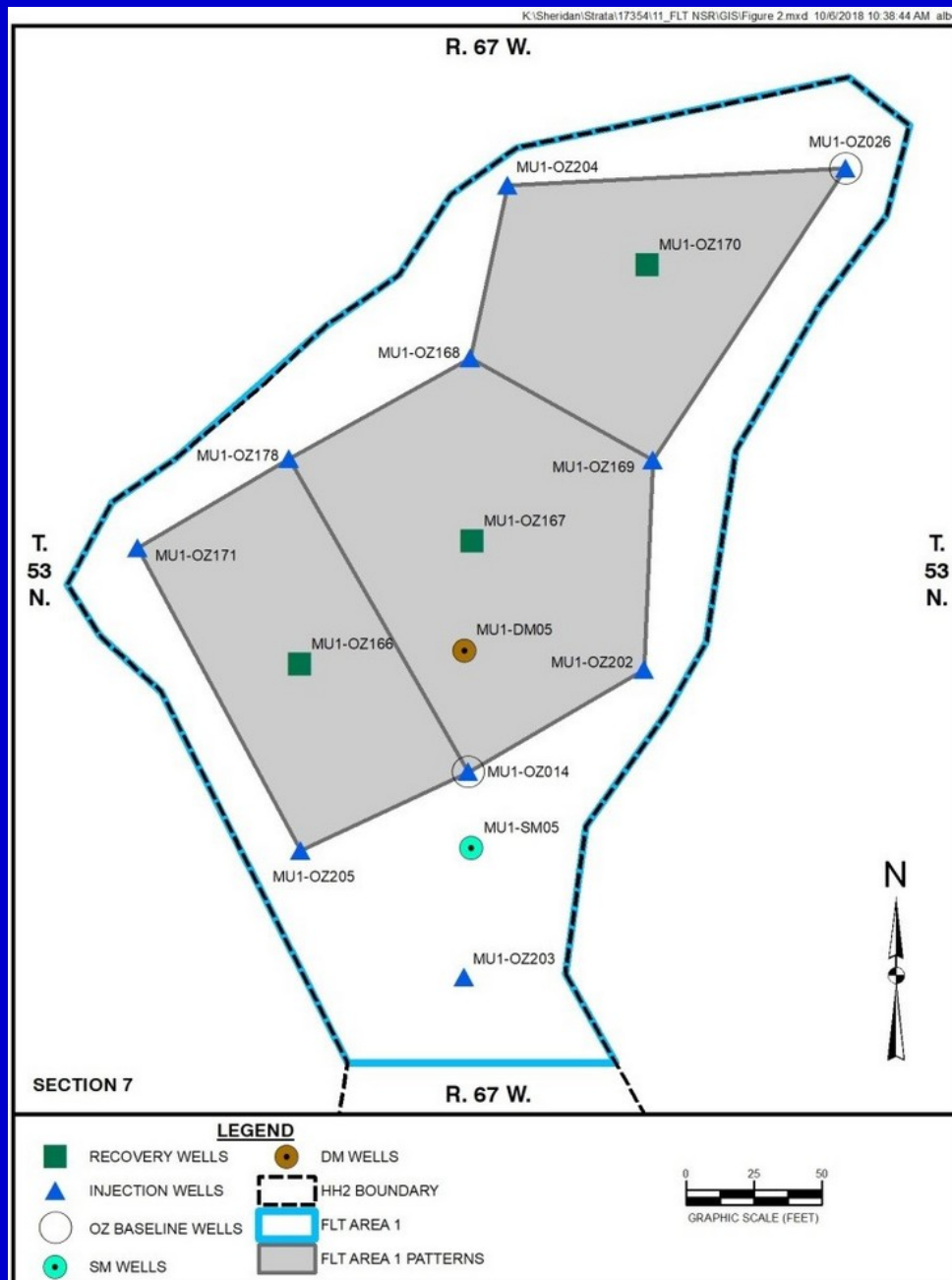


Header House Interior - Lance Projects



Low pH Field Demonstration Wellfield Patterns Ross Project

Use sulphuric acid to reduce the mining area pH to around 2



Crow Butte (on standby) - Well field operations foreman monitors the flows from each of the ISL production wells from the well house.



- **Crow Butte was the first uranium mine in Nebraska - discovered in 1980 and began production in 1991.**
- **Crow Butte has used ISL to extract about 11.8 million pounds of uranium**
- **In the second quarter of 2016, Cameco made the decision to curtail production and defer all wellfield development at its U.S. operations so commercial production has ceased.**

Smith Ranch Mine Integrity Test





Smith Ranch



Nichols Ranch Wellfield



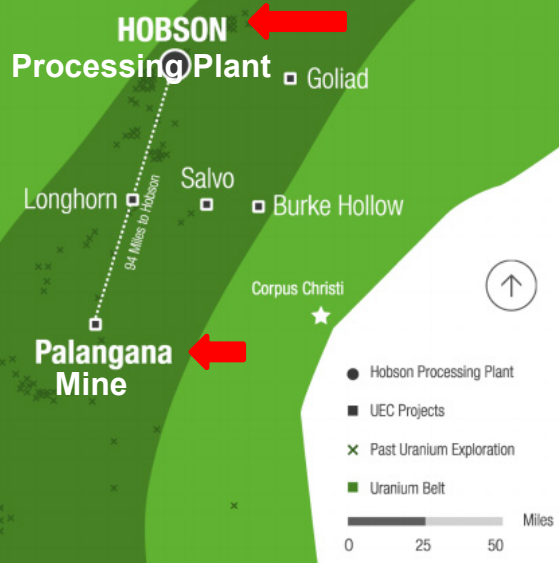
Submersible Pumps



Monitoring Well

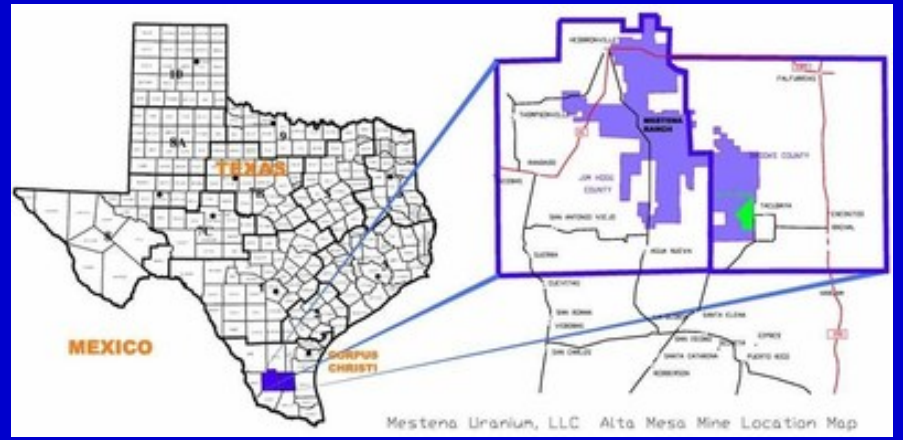






Texas ISL Mines and Processing Plants on Standby

Alta Mesa mine



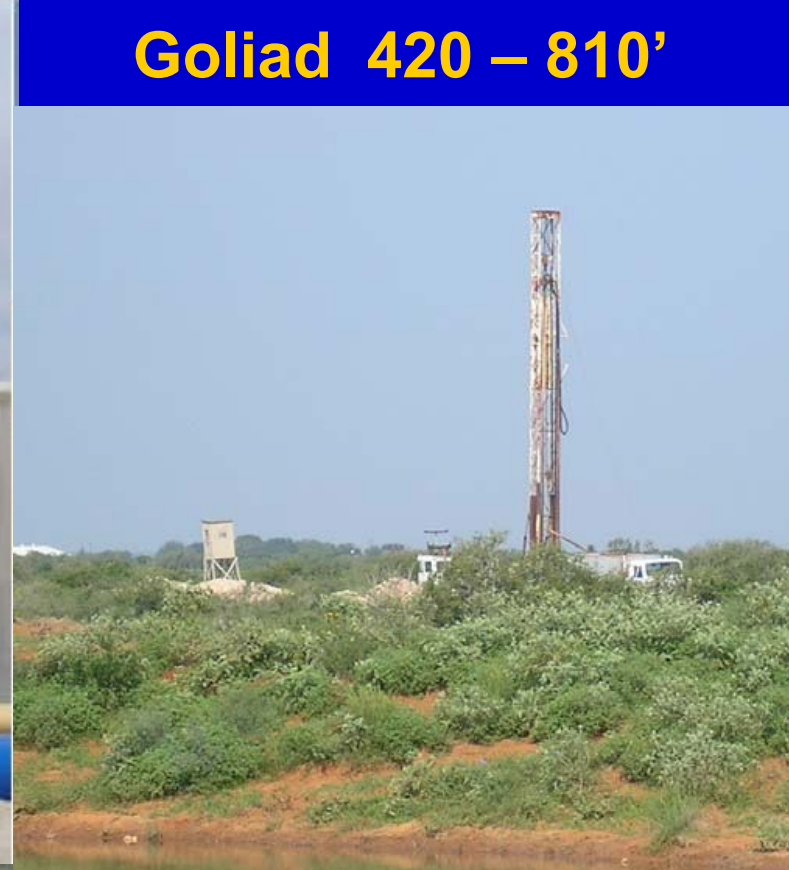
Kingsville Dome – Goliad 600 – 750' (1988)

Undergoing Restoration



The Alta Mesa ISR (2006) On Standby

Goliad 420 – 810'





Ion exchange columns at a Texas ISR operation



Ion exchange resin beads used in the ISR process



Precipitation of uranium

Filter Press



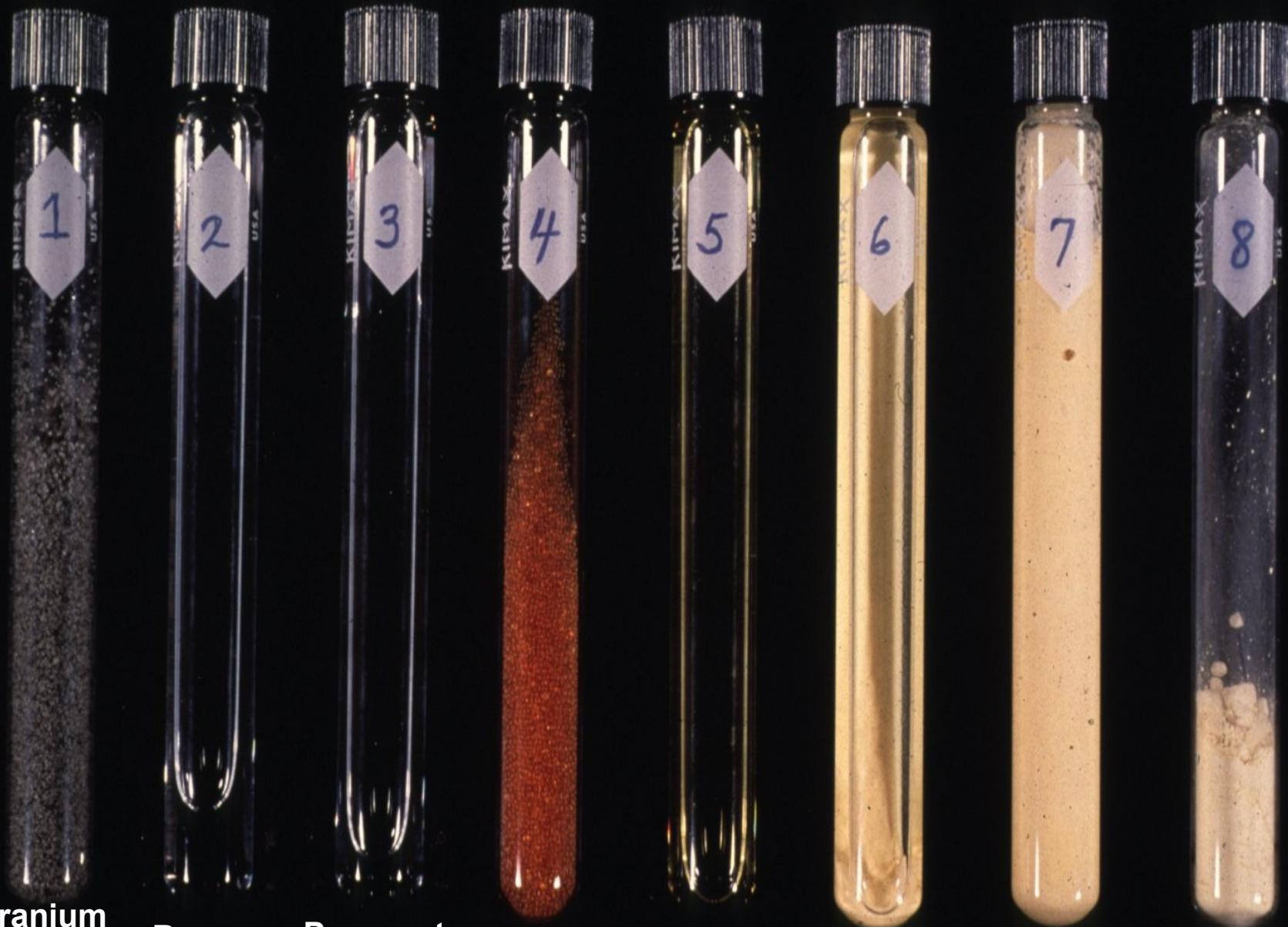


Employee removing uranium from a filter press



**Zero-emission
Rotary Vacuum
Dryer**





**Uranium
Bearing
Sand**

**Barren
Lixiviant**

**Pregnant
Lixiviant**

**IX
Resin**

Eluate

**Unfiltered
Slurry**

**Filtered
Slurry**

**Yellow
Cake**

Yellowcake Uranium in Barrel for Shipping

One Barrel weighs about 880 pounds



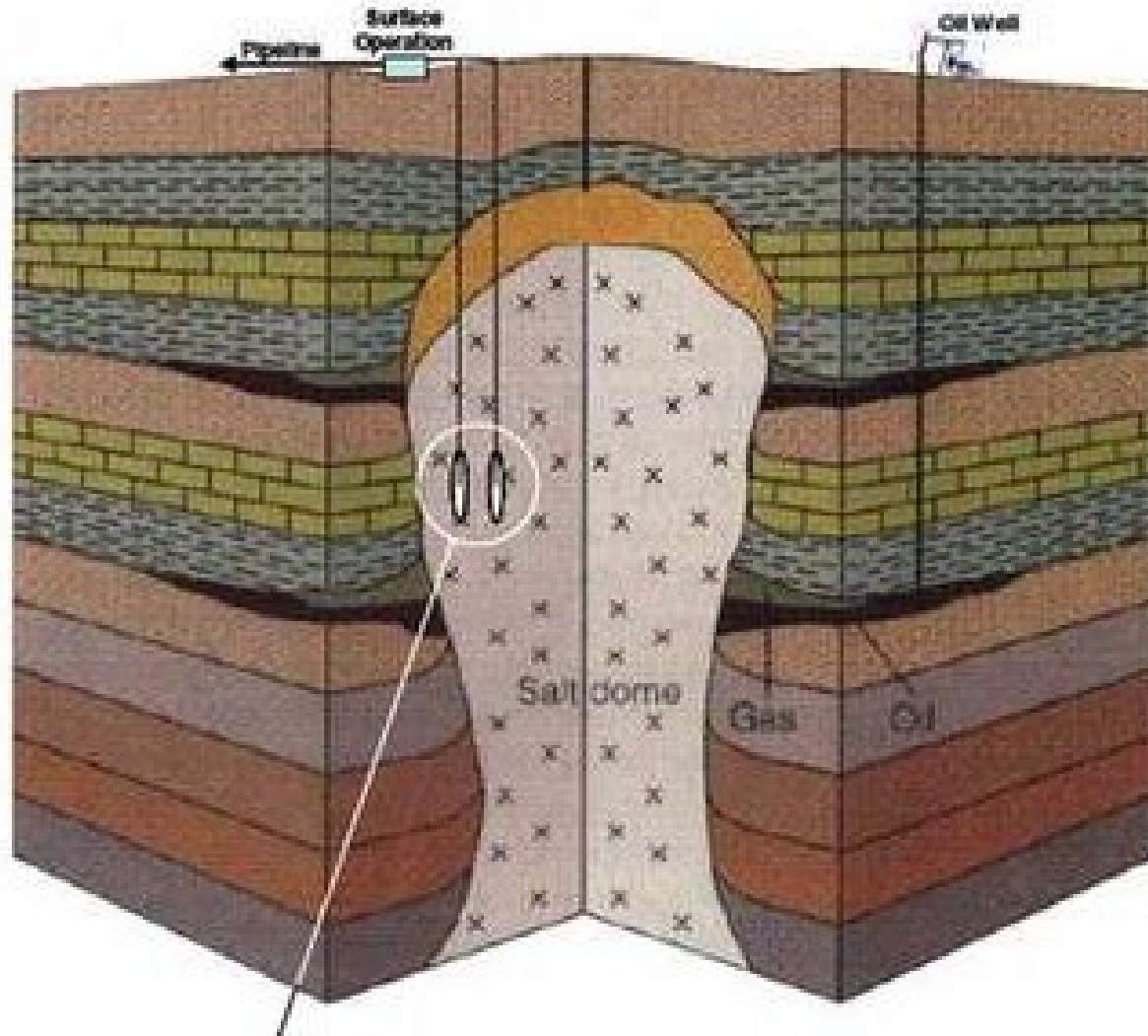


Class I Nonhazardous Disposal Well

Brine

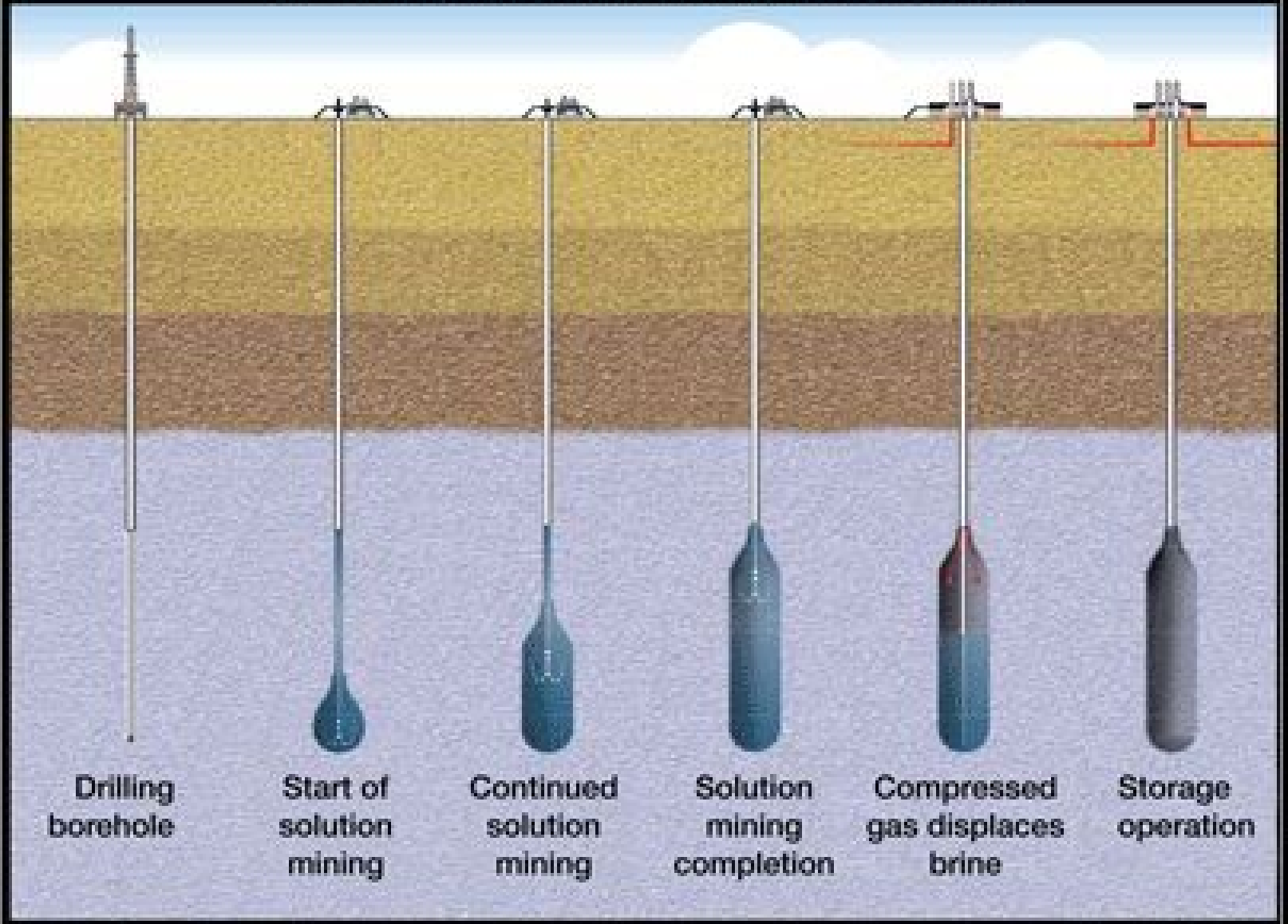
Mining

Solution Brine Mining

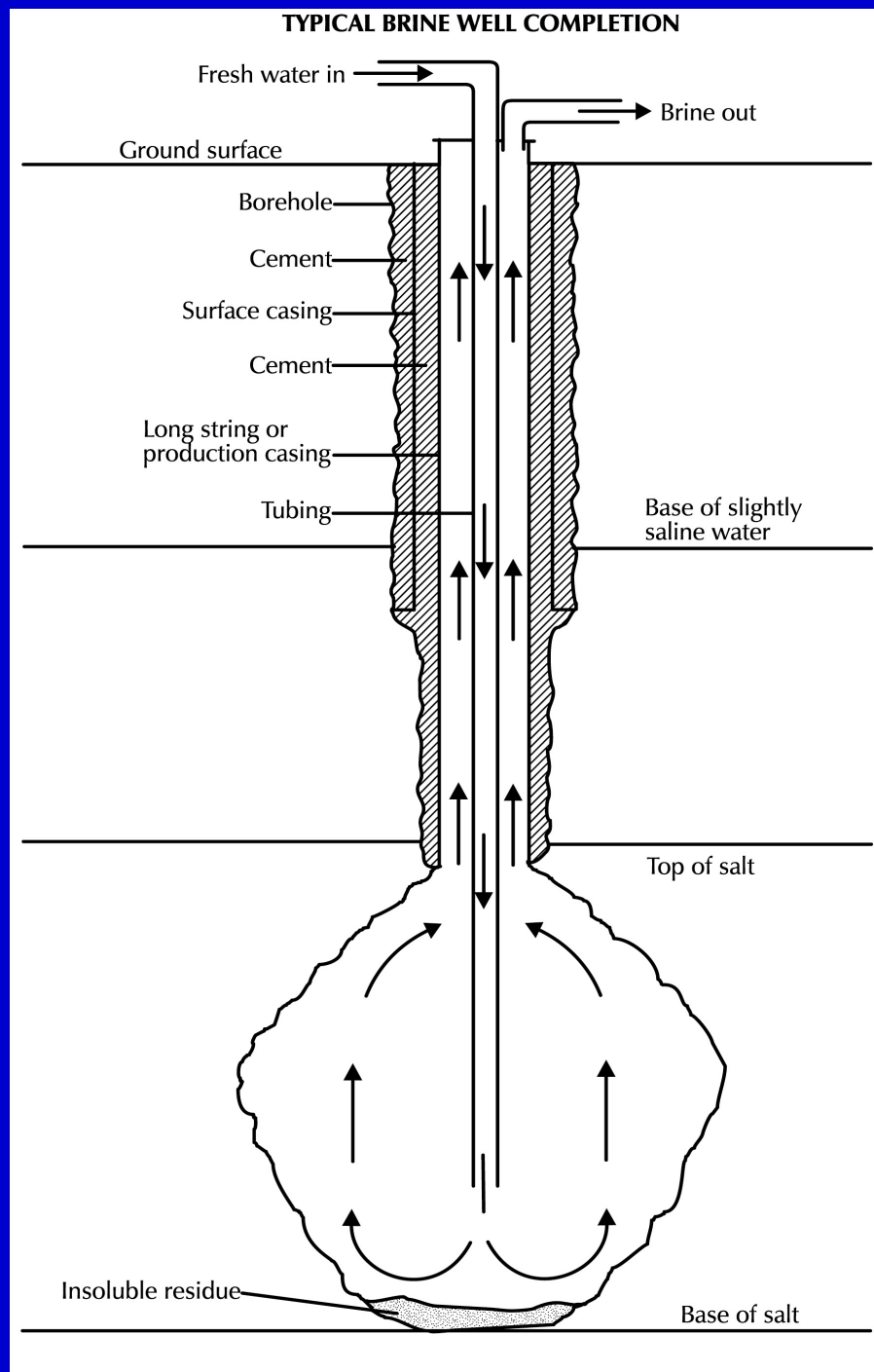


Salt Dome Caverns

The Solution Mining Process



Brine Mining Well



Brine Mine Wellhead



KEEP OFF WY!
DANGER - HIGH PRESSURE
SAFETY DISTANCE BETWEEN
THIS WITNESS AND THE NEXT WITNESS



U L O 8

**TYPICAL SCHEMATIC OF A CONTEMPORARY
MANISTEE FRACTURED SALT GALLERY**

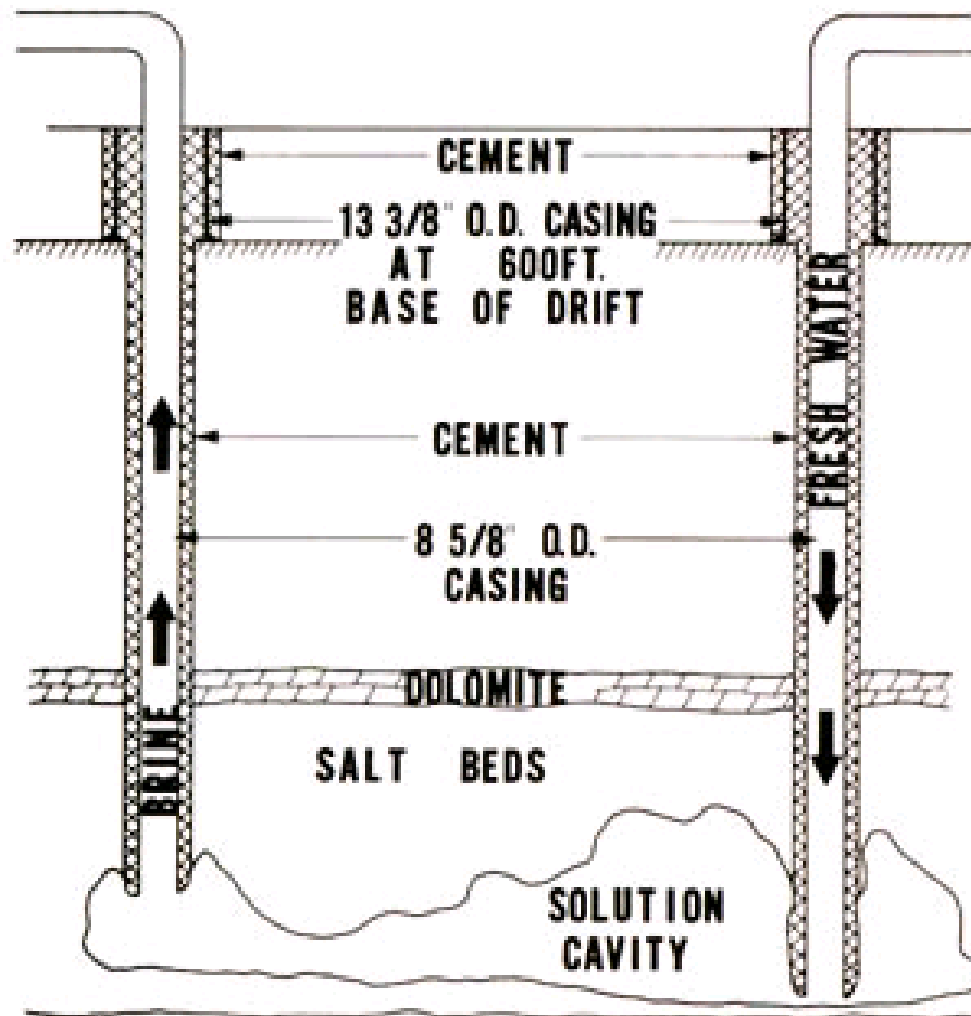


FIGURE NO. 2

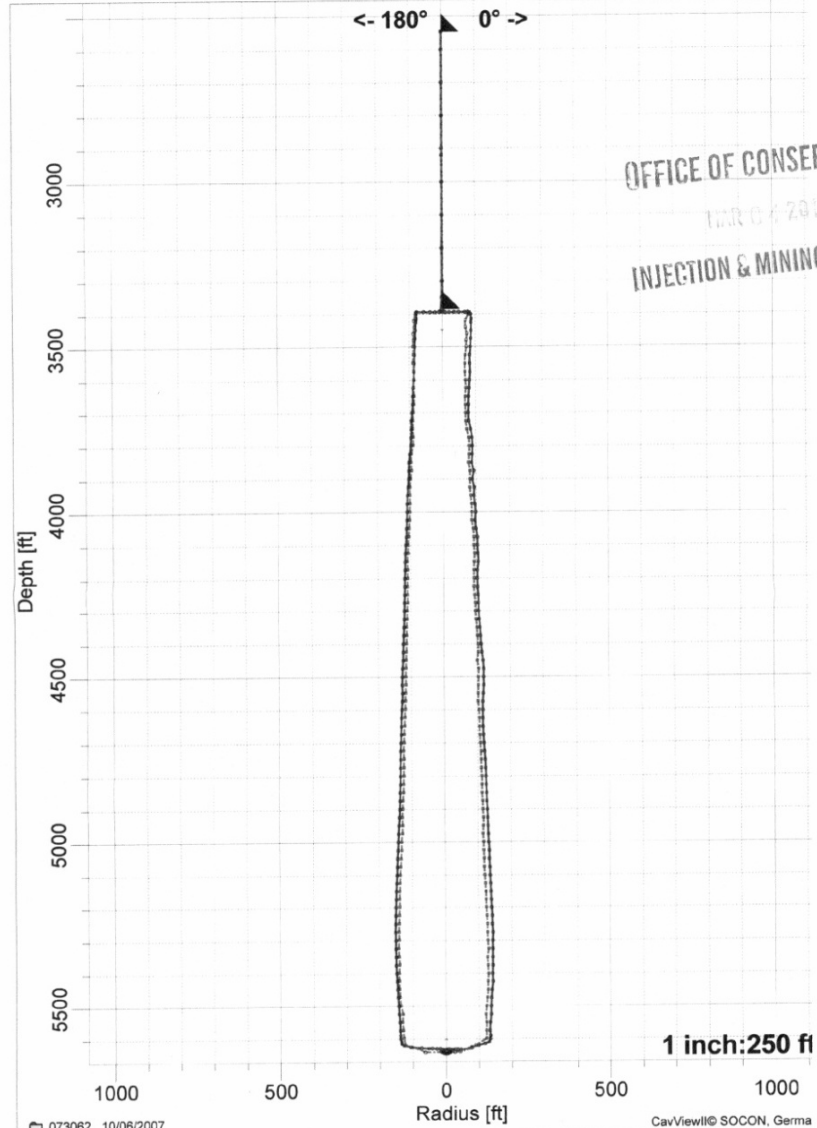
Sonar Survey Of a Brine Mining Cavern



SOCON Sonar Well Services, Inc.

Vulcan #3

10/06/2007



— (10/06/2007) - - - (01/20/2005) ▲ 133/8" : 2546.0 ft
▼ 113/4" : 3384.0 ft ∇ ^ Tilting position

Bayou Corne - Louisiana



Before Bayou Corne Sinkhole

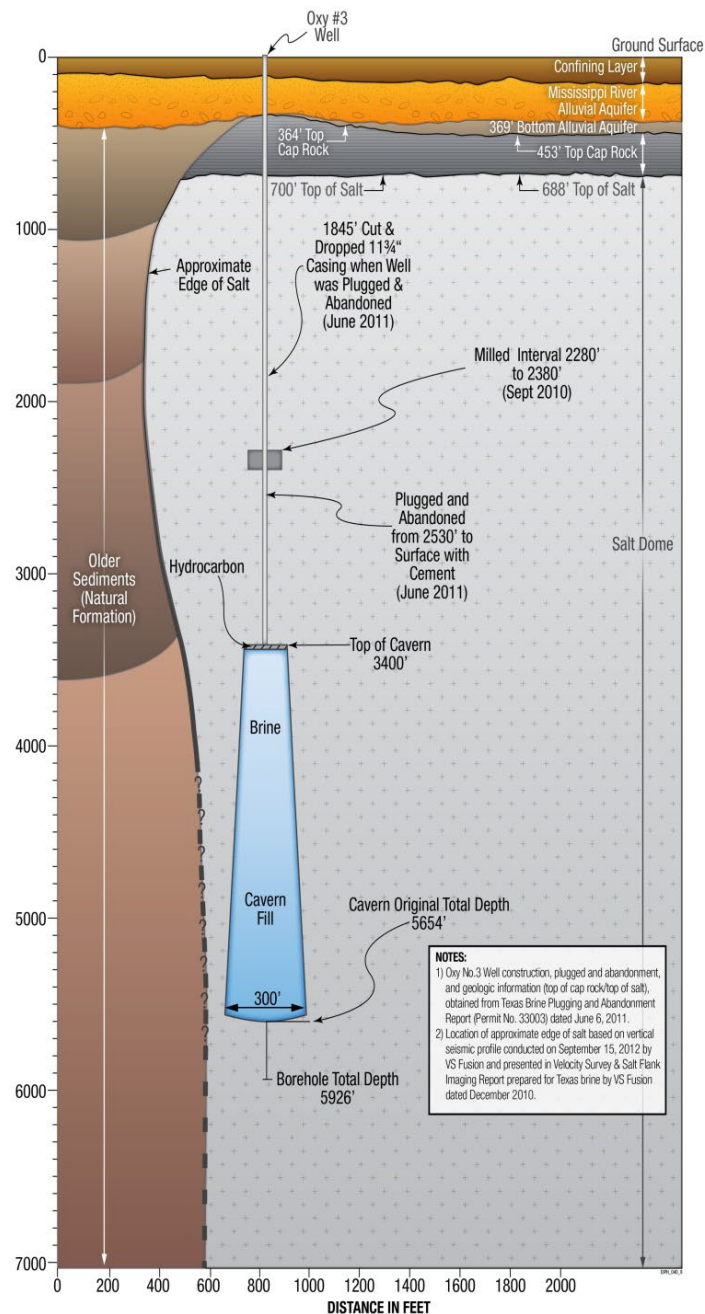


8/3/12

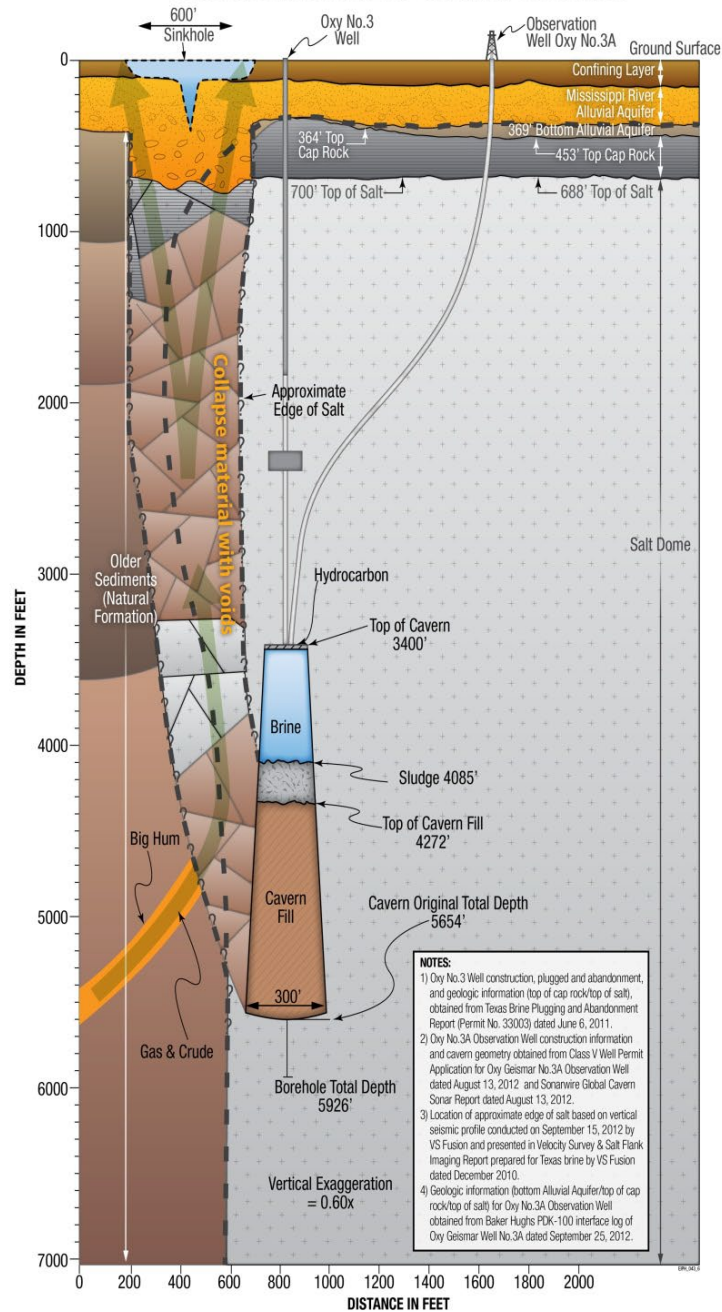
After



CONCEPTUAL MODEL PRIOR TO 08/02/2012



CONCEPTUAL MODEL OF CURRENT SITUATION

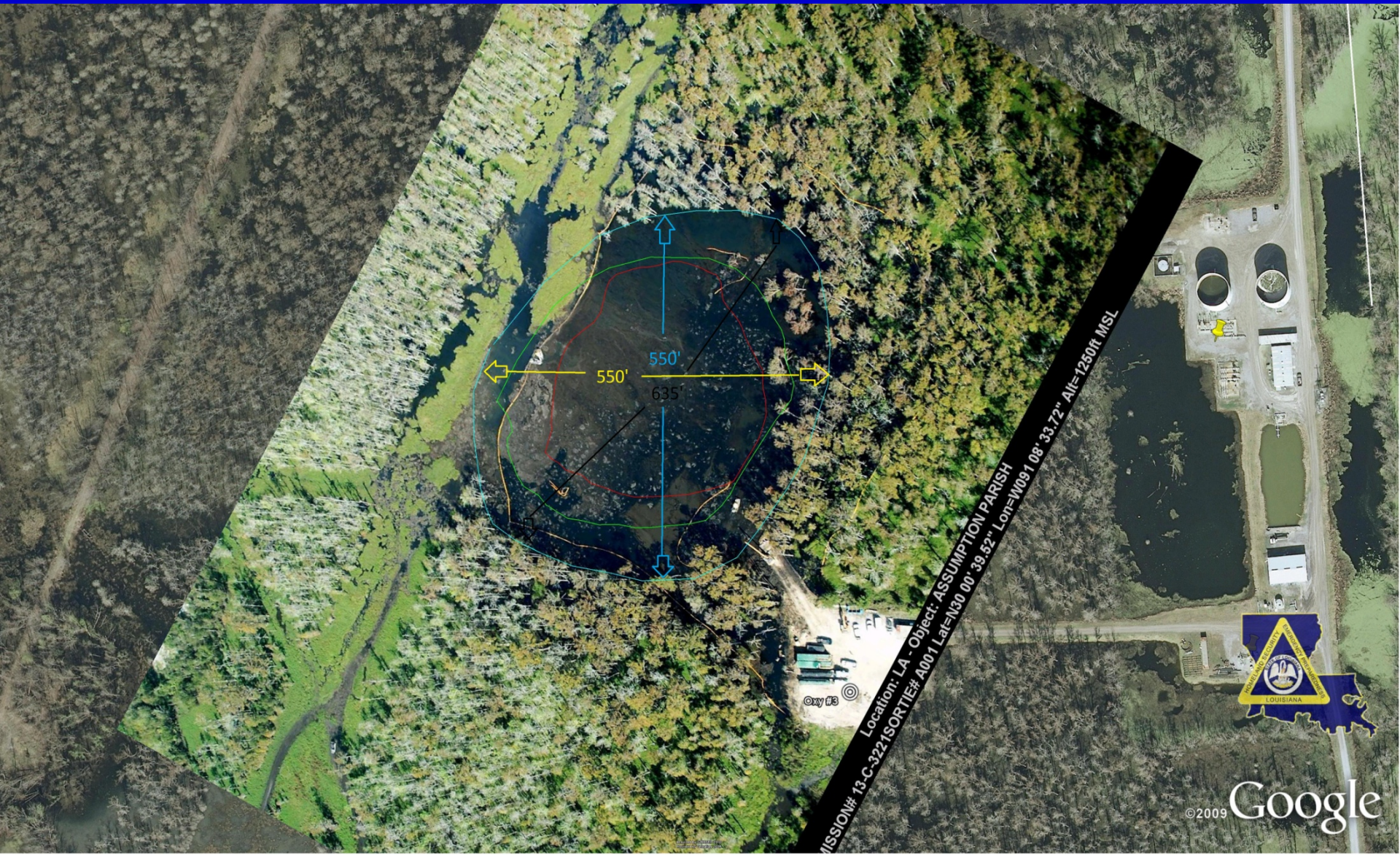






Assumption Parish OHSEP, 08/21/2012





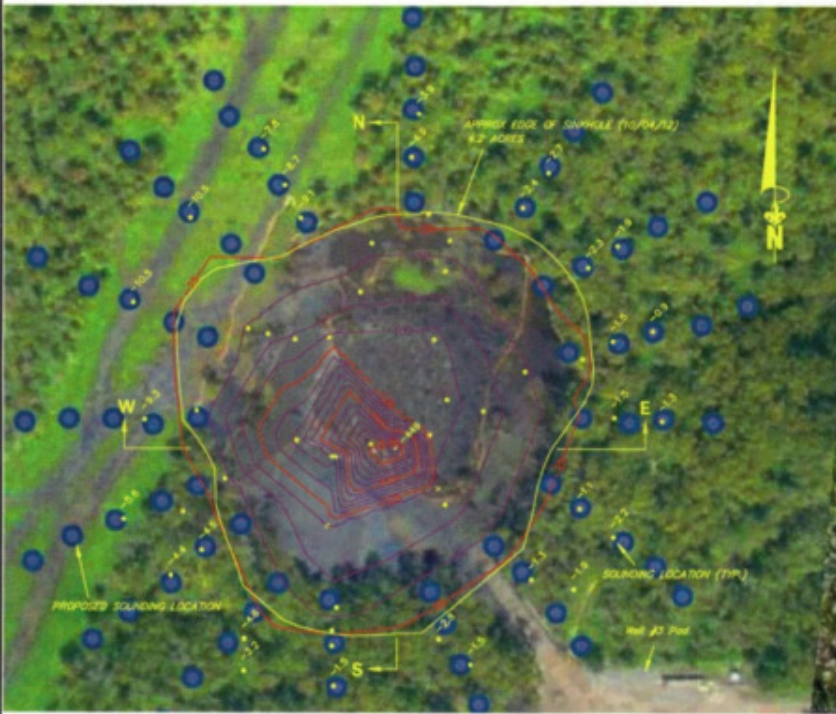
MISSION# 13-C-3221SORTIE# A001
Location: LA - Object: ASSUMPTION PARISH
Lat=N30 00' 39.52" Lon=W09 1 08' 33.72" Alt=1250ft MSL



©2009 Google

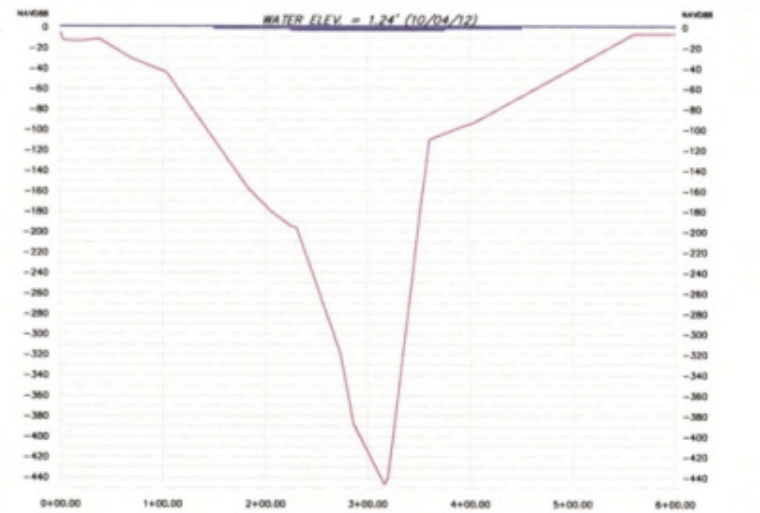
Sinkhole Dimensions 10-12-12

Oct



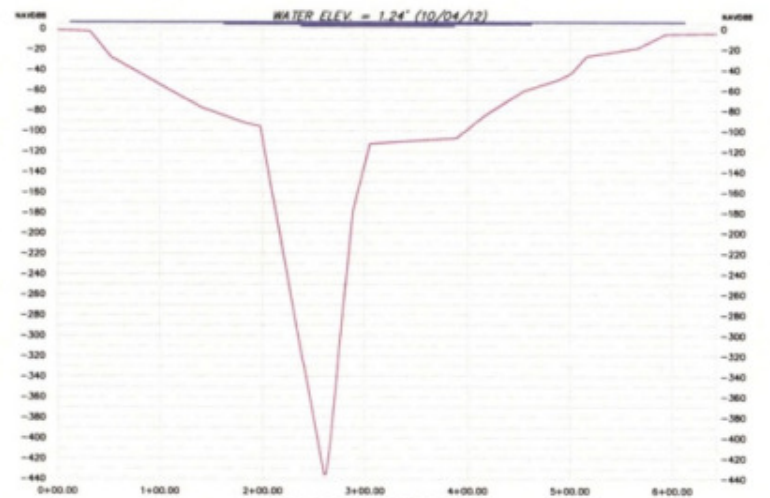
PLAN SCALE
1" = 10'

VOLUME CALCULATION
USING THE APPROXIMATE EDGE OF THE SINKHOLE AS SHOWN AND THE UPPER ELEVATION LIMIT OF 0.00', THE INTERNAL VOLUME MEASURES APPROXIMATELY 180,000 CU. YDS.



CROSS SECTION W-E

PROFILE:
HORIZONTAL: 1"=100'
VERTICAL: 1"=50'



CROSS SECTION S-N

PROFILE:
HORIZONTAL: 1"=100'
VERTICAL: 1"=50'



Miller Engineers & Associates, Inc.
Consulting Engineers & Land Surveyors
601 Main Street P.O. Box 223
Franklin, La. 70538

TEXAS BRINE
BAYOU CORNE/GRAND BAYOU SINKHOLE
PLAN AND PROFILE

PLAN & PROFILE

Drawn: M. J. Fure, PLS
Designed:
Date: 10/04/2012
Project No: 120512
Scale: As Shown
Revised: NA
Sheet 1 of 1



6/11/14 Flyover

Flyover 6/11/14



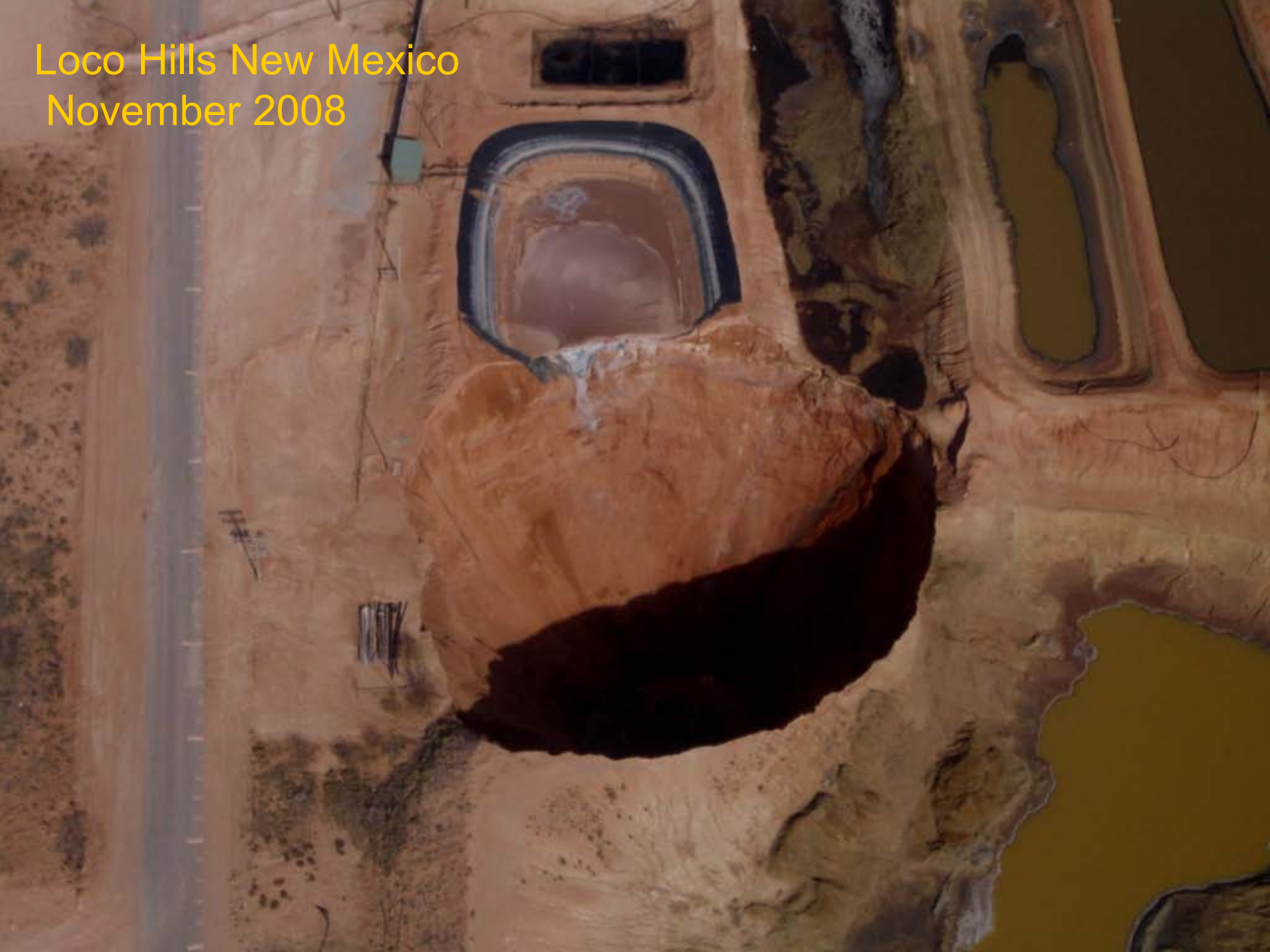
▶ ⏪ 🔊 1:50 / 2:04

Approximately 31 acres

**Jim's Water Service
New Mexico
July 2008**



Loco Hills New Mexico
November 2008







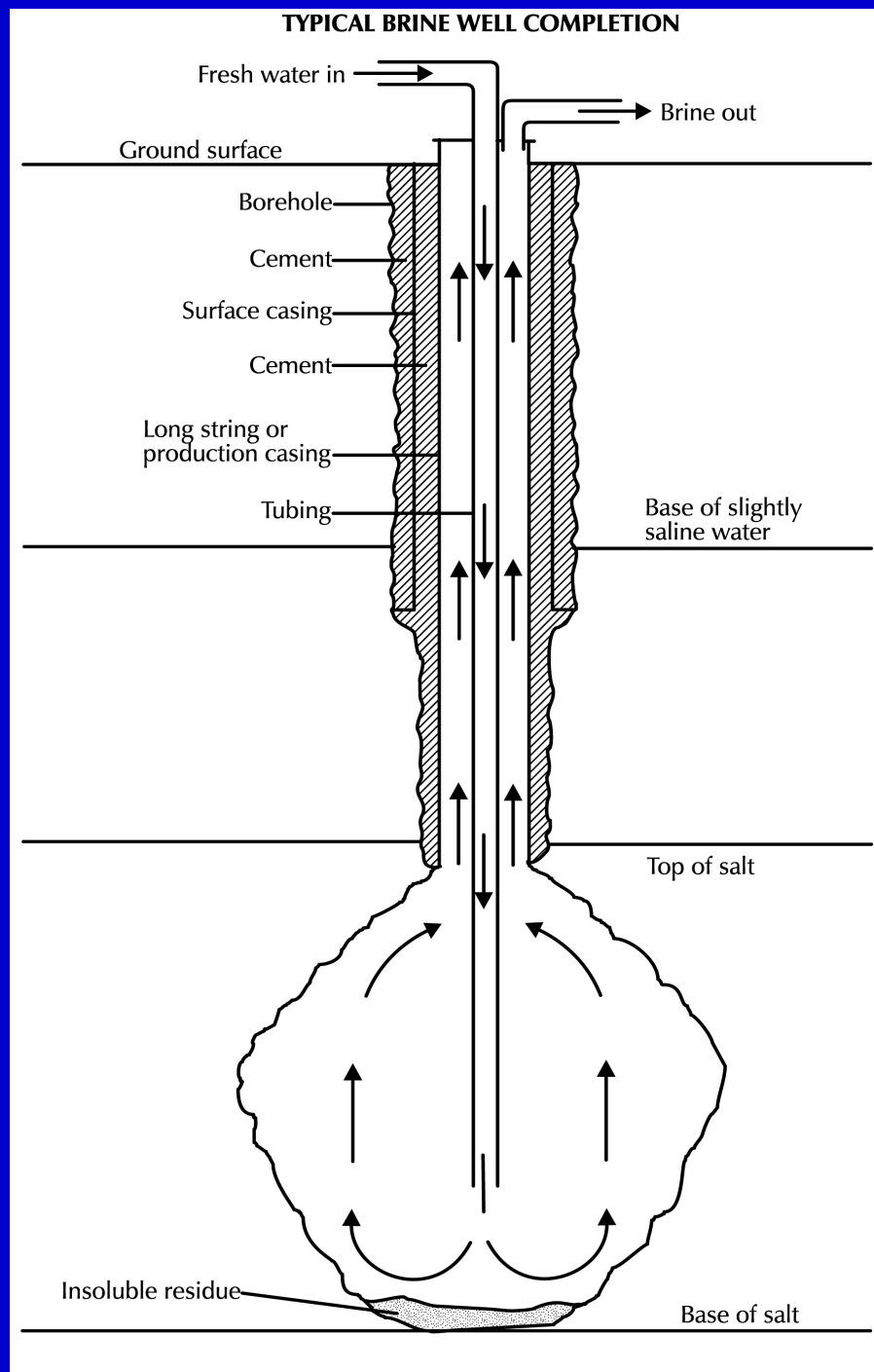


Denver City, Texas

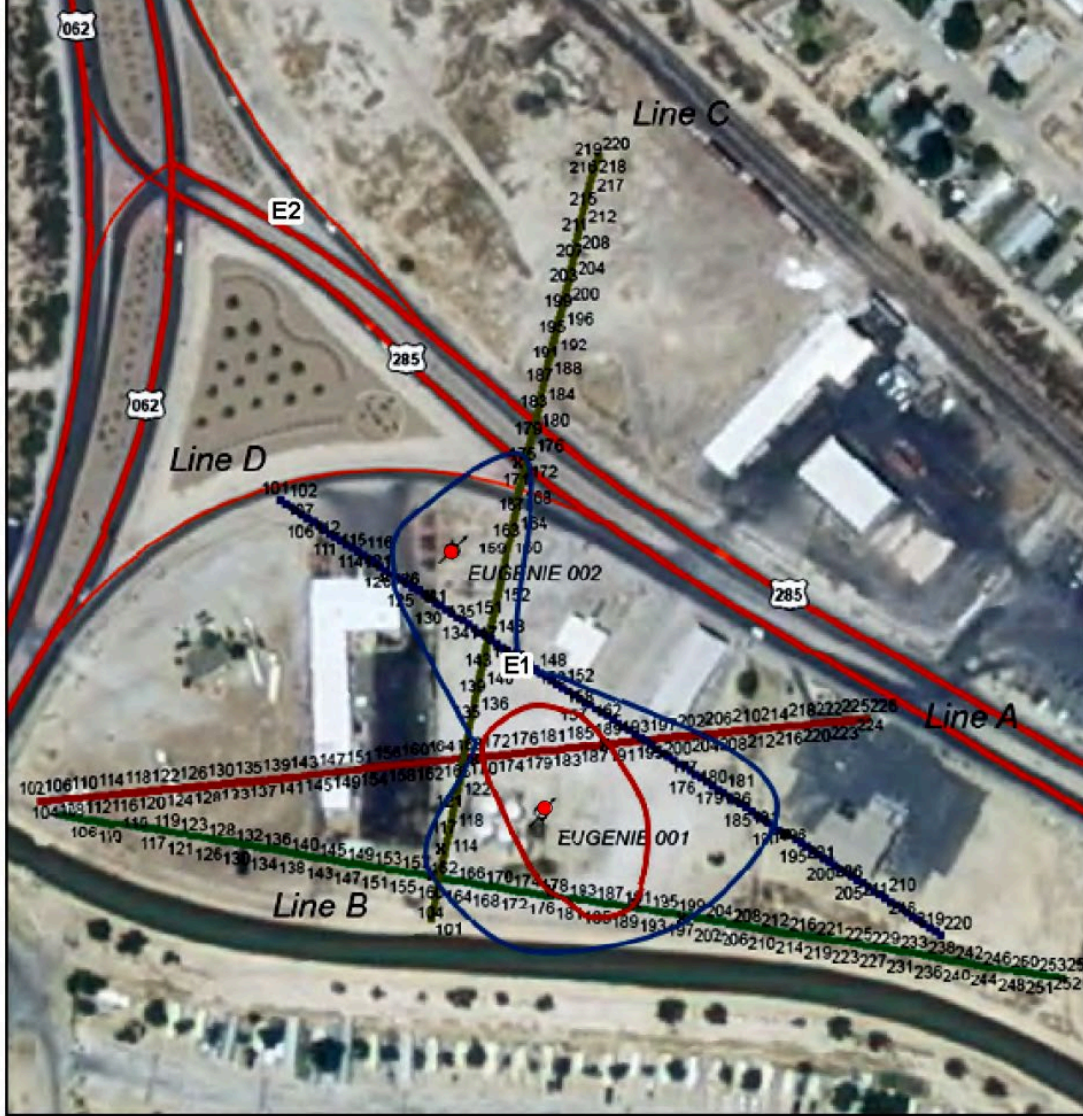


07/28/2009

Brine Mining Well



Carlsbad NM Brine Mine



Interpreted Cavern Shape

New Mexico - OCD

NAD 1983 New Mexico East

DRAWN BY: C. Hocking, RESPEC

DATE: 19 - Nov - 2009

FILENAME: Carlsbad Caverns Entrance Area



Legend

- I&W Wells
- Cavern Shape
- Seismic Signature of Cavern Effects
- Area of Greatest Seismic Disruption

Sodium Sulfate Well

Sodium Sulfate is used in detergents and paper pulping



Sodium Sulphate Reservoir and Plant



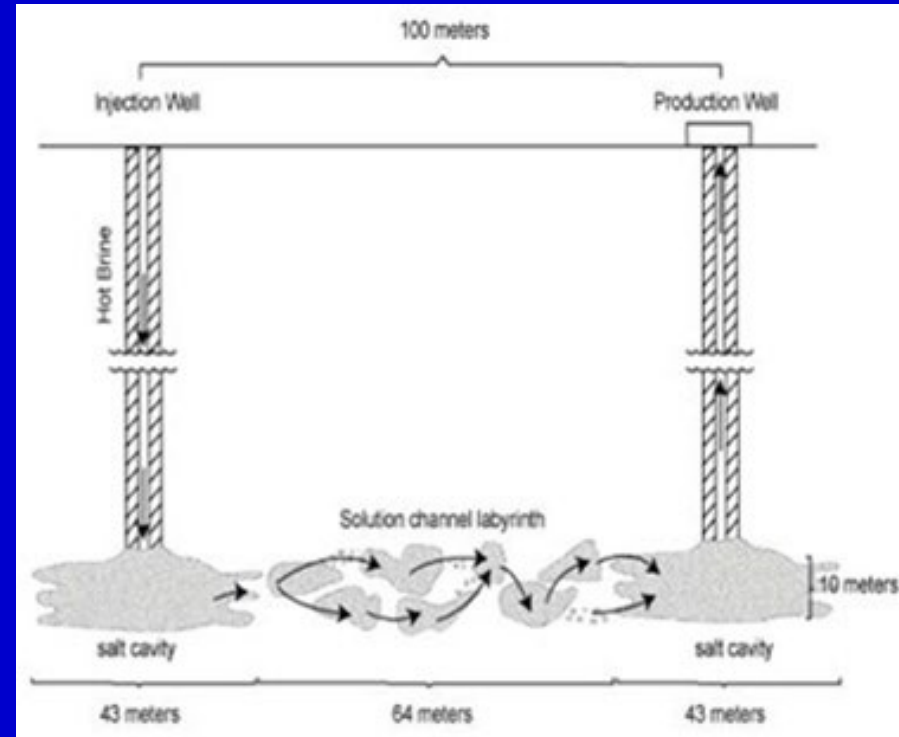
Nahcolite (NaHCO_3) (Sodium Bicarbonate) Mineralization



Nahcolite Solution Mining Wellhead



Potash Solution Mining



Potash refers to potassium compounds with the most common being potassium chloride (KCl). Potash is also used in fertilizers.





Potash Core Holbrook , AZ

Passport Potash, Inc's Holbrook Basin site visit.

PPI:TSX.V

C41-09
1677-3

Potash Core Holbrook , AZ

Passport Potash Quickly Advancing Holbrook Property

TSX.V : PPI
OTCQX : PPRTF



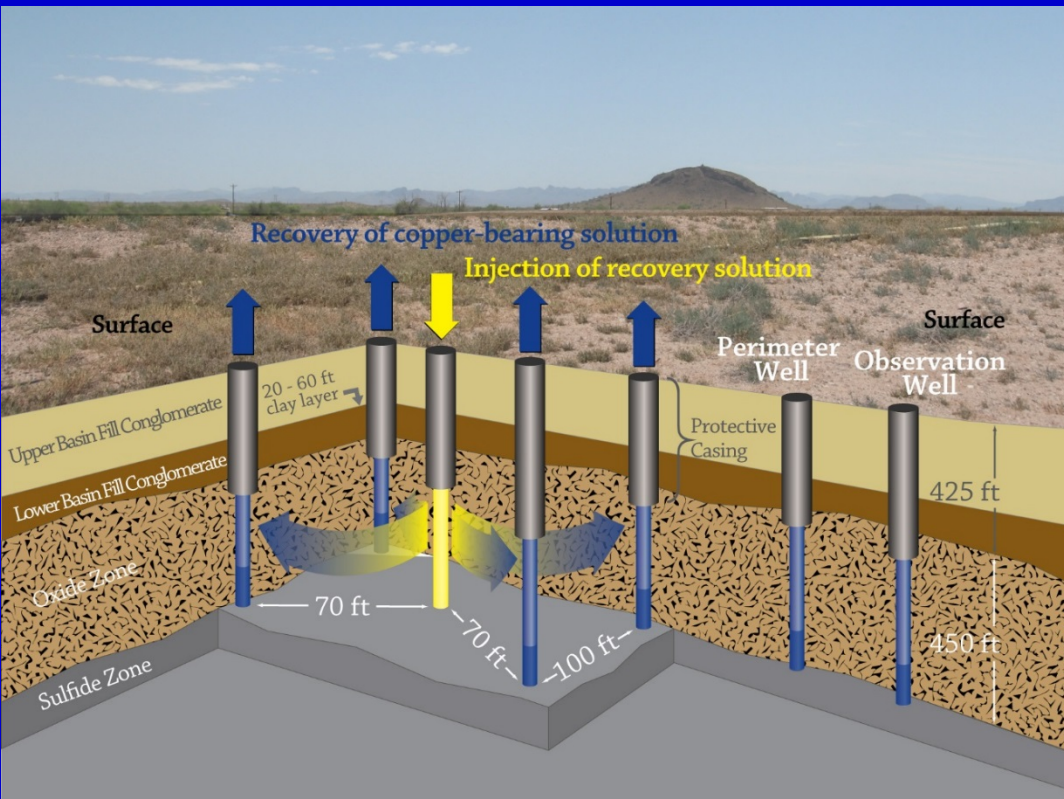
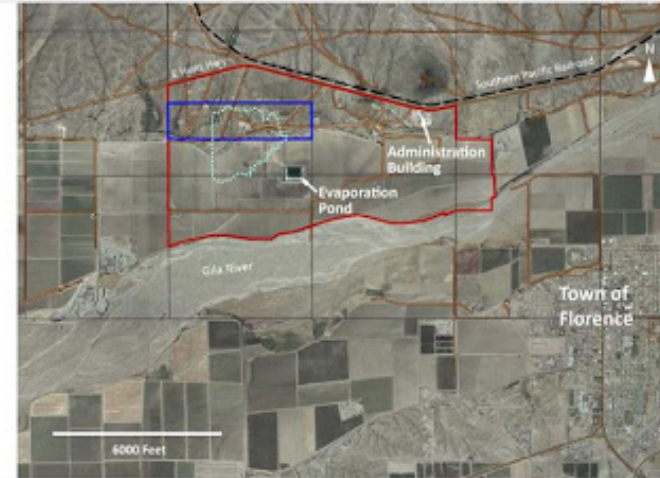
Copper Solution Mining

The Florence Arizona Copper Project could produce as much as half of the 2.8 billion pounds of copper reserves at the 400 - 1200 foot deep deposit.

Dilute sulfuric acidic solutions (.5%) are introduced to the copper-bearing ores, causing dissolution of soluble copper minerals

Florence Land Holdings & Site Infrastructure

- Curis Resources Ltd. Patented Land
- State Mineral Lease
- Outline of deposit @0.05% TCU Cut-off





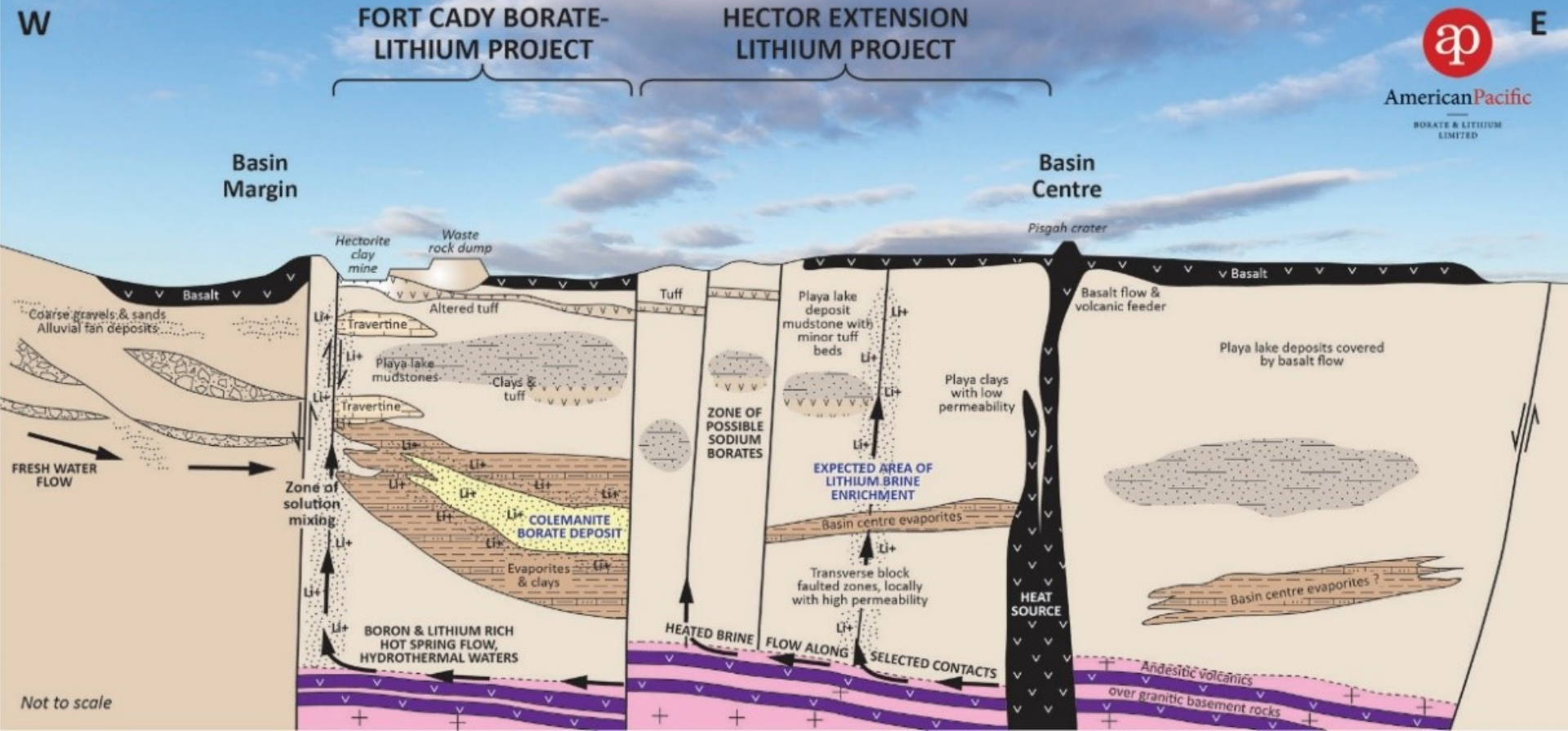


4 injection wells and 9 producing wells



Fort Cady ISL Borate Mine in the Hector Basin CA Mojave Desert

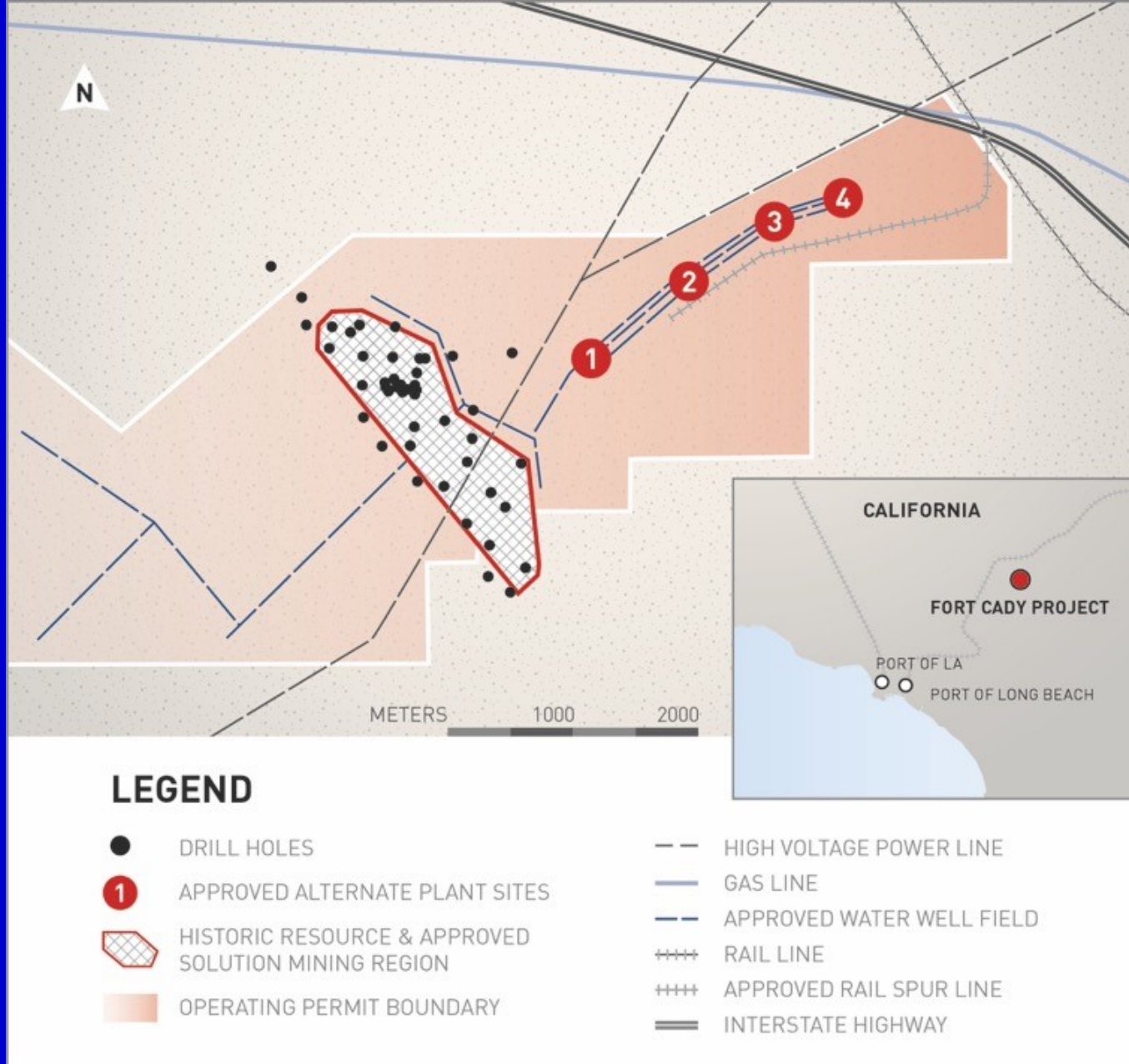




Not to scale

Mineralization occurs in lake sediments & Miocene evaporites. The colemanite is fine-grained crystals in beds and bands within the anhydrite-rich part of the evaporite.

The deposit averages 118 feet thick at an average depth of 1,350 feet and covers an area of 384 acres.



Currently there are 104 operating wells

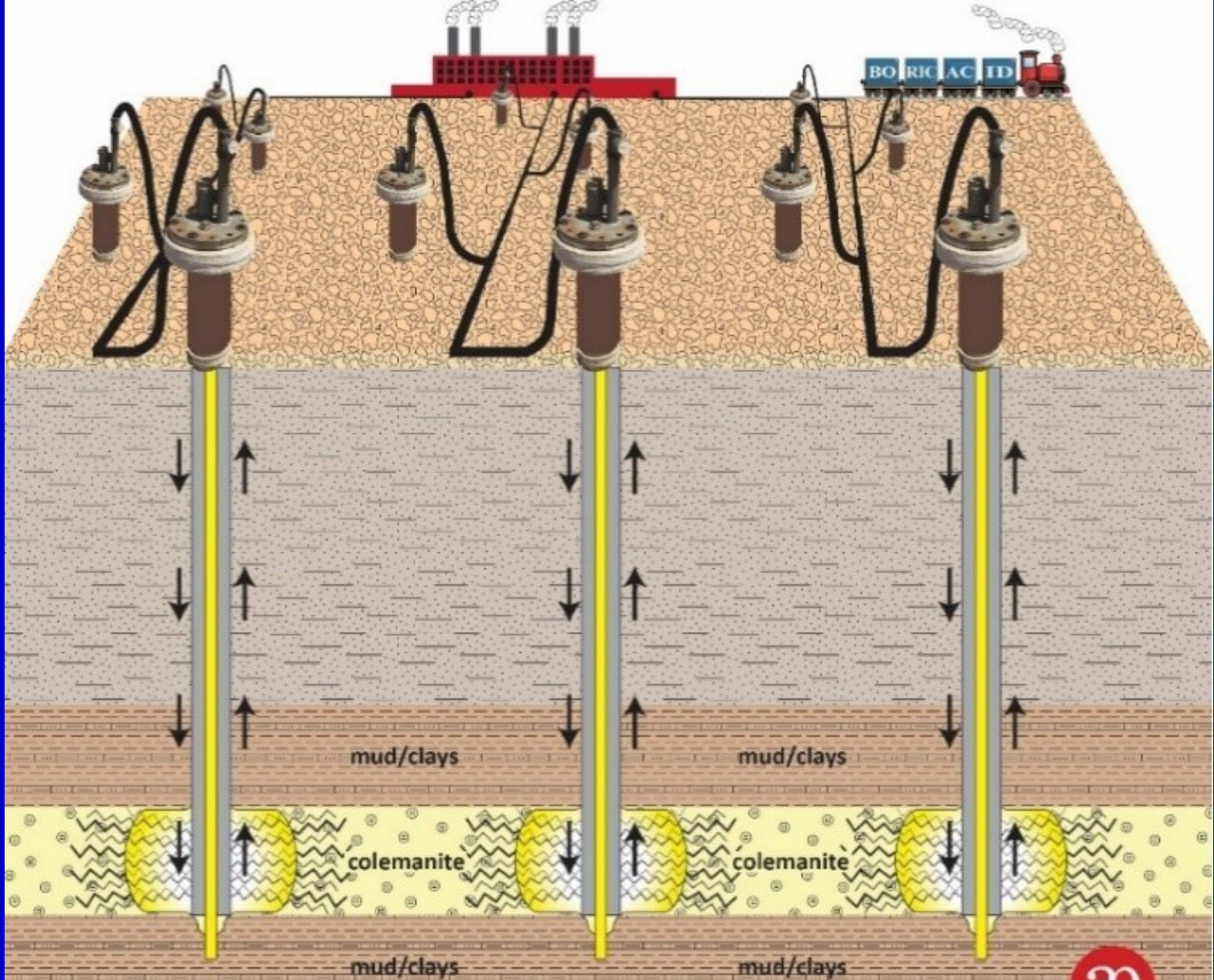


Fort Cady Site in October 2017 showing drilling activity, and pilot plant in the background.

The recovery of boron from the colemanite mineral is accomplished by injecting a weak acid solution (no more than five percent hydrochloric acid, sulfuric acid, or a mixture of both in a water solution) into the ore body.

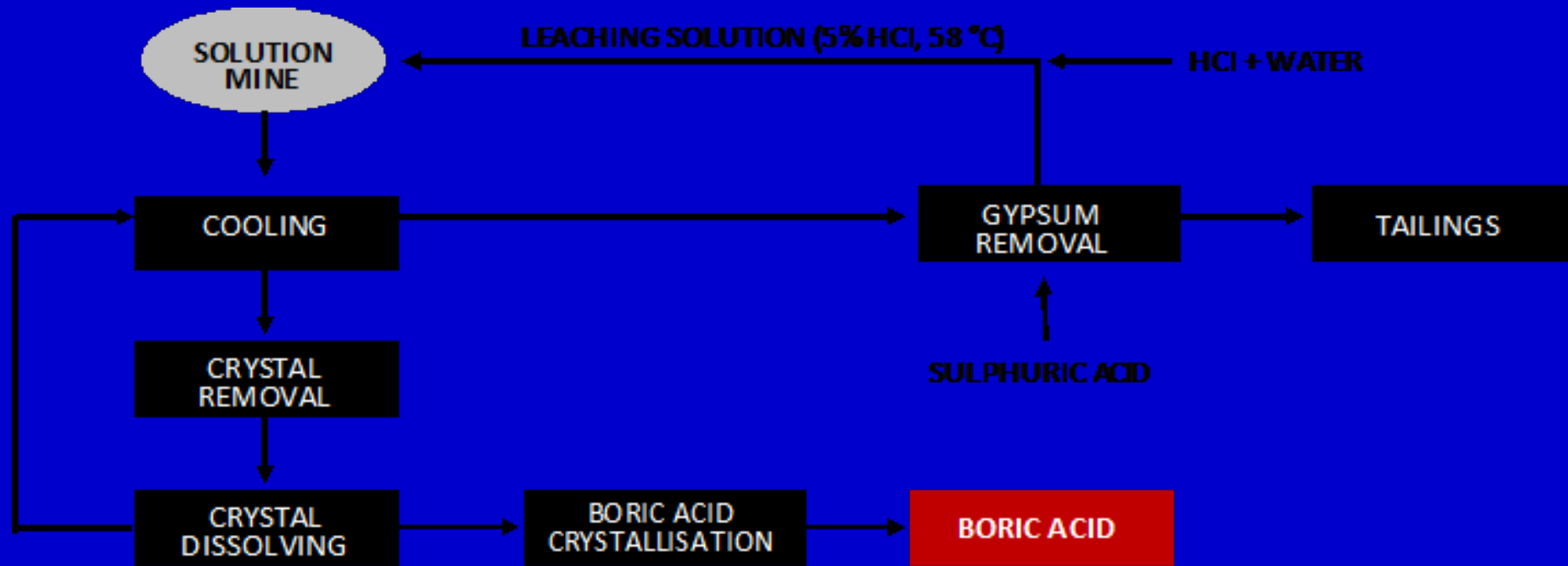
The acid reacts with the alkaline nature of the ore body to recover a mixture of borate product and calcium chloride which is dissolved in solution as products of the chemical reaction.

This solution is withdrawn from the well and pumped to the process plant where borate crystals are precipitated.



American Pacific

BORATE & LITHIUM
LIMITED



The remaining formation would be a porous matrix of clays and insoluble minerals. The void space that would result from the leaching process would constitute less than 12 percent of the formation, and the void space would ultimately contain water, therefore subsidence is not expected to occur.

Borate Uses

DETERGENTS

Used as a cleaning and bleaching agent to increase the performance of products.

FLAME RETARDENT

Used in all dry powder fire extinguishers and fire retardant paints

WOOD TREATMENT

Used in wood as a preservative preventing decay; slows and suppresses the spread of flames if burning occurs.

NUCLEAR REACTORS

Absorbs neutrons increasing nuclear reactor safety.

PERSONAL CARE PRODUCTS

Borate properties control bacteria and fungi in personal care products and significantly improve cleaning action.

Class III Construction

- Cased and cemented to prevent fluid migration into or between USDWs
- Casing and cement designed for life expectancy of the well
- Information required for naturally water-bearing injection zone formations
 - Fluid pressure
 - Fracture pressure of the formation
 - Physical and chemical characteristics of the formation fluid

Class III Operation

- Can't inject between outermost casing protecting USDWs and the wellbore
- Maximum injection pressure must be below fracture pressure
- Pump test uranium mines
- Most Class III solution mining wells use fresh water as the “mining” fluid

Class III Monitoring

- Mechanical integrity testing
 - Brine mining after initial test every 5 years
 - Uranium, sulfur – after an initial test, since theoretical well life < 5 years, no MIT required by regulation
- Monitoring injection zone
 - Fluid levels – semi-monthly
 - Ground water parameters – semi-monthly
- Monitoring wells monitored quarterly

Class III Inspection

- Look over general condition of wellfield
 - Transmission lines
 - Tanks
 - Wellheads
 - Ponds
 - Grass cut?
- Injection pressure (wellhead gauge) complies with permit (must be below fracture pressure)
- Monitor injection fluids frequently enough to determine characteristics
- Injection rate and volume comply with permit limits

Class III Inspection

- Evaporation and holding ponds
 - Adequate freeboard
 - Leak detection system
- Monitoring wells (if any)
 - Fluid levels and ground water parameters (excursions)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ)
Critical Infrastructure Division
Underground Injection Control (UIC) Class III Permits Investigation Checklist

Permittee's Name and Mailing Address _____

Telephone information _____ Fax Information _____

Permittee's representative/ Title _____

Purpose and Scope of Inspection: _____

Inspection Location(s) _____ Inspection Date (s) _____

Inspection Type Routine Pre-Permit Initial Special Announced Unannounced

Type of Permit _____ Permit No. _____

Date Issued/Amended _____ Type of Project _____

TCEQ Region _____ TCEQ Inspector(s)/Office _____

Inspector/Date/Results of Previous Inspection _____

Comments: _____

Results of this Inspection In Compliance Violation(s) Enforcement Action Needed

Recommendation(s) _____

Comments _____

Areas of Concern from previous inspection _____

Areas to receive special attention at the next inspection _____

Note: All information stated on this inspection checklist resulted from records inspection, the inspector's observations, and/or statements and representations made by the employees present at the time of inspection.

Inspector _____ Reviewed by _____

Date of Report _____ Date Reviewed _____

GENERAL INFORMATION

Site Security and Operating hours _____

Type of Processing and Description _____

No. of Production Area Authorization (PAA) / Average Depth of PAA _____

Average Depth of Injection/production Wells / Type of Casing _____

Average Depth of Monitor / Baseline Wells / Type of Casing _____

Current Status of Operations _____

Method of Wastewater Storage prior to Injection

_____ Surface Impoundment (Ponds) _____ Wastewater Storage Tank
_____ No. of ponds _____ No. of wastewater Storage tanks

Method of liquid Waste disposal _____ Class I W/DW _____ Irrigation _____ Surface Discharge

Disposal Permit No. _____

Comments: _____

Method of solid waste disposal _____ on site _____ off site

On site solid waste pit(s)? _____ NA _____ Yes _____ No

Comments: _____

Maximum allowable injection pressure at the wellhead in compliance with permit requirements?

NA Yes No

Comments: _____

Has the permittee injected between the outermost casing protecting USDWs and the well bore?
30 TAC §331.83(b)

NA Yes No

Comments: _____

MONITORING REQUIREMENTS

Parameter Chosen to measure water quality (Control Parameter) 30 TAC §331.84(c)

Uranium Sulfate Conductivity Chloride Alkalinity Other

Are the monitor wells completed in the injection zone monitored for fluid levels and chosen parameters twice a month at two weeks interval?

NA Yes No

Comments: _____

Is the permittee required to comply with the monitoring requirements specified in 30 TAC §331.82(h) (Construction Requirements) 30 TAC §331.84(f)

NA Yes No

Comments: _____

Are all monitor wells for permit/production areas sampled by the permittee at least twice a month at two weeks intervals?
30 TAC §331.84(e)

NA Yes No

Comments: _____

Are the water samples analyzed for control parameters by the second working day and reported as required in §331.85(a)?

NA Yes No

Comments:

Are the samples analyzed off site by a third party laboratory or on site by the permittee?

NA Off site On site

Name of the laboratory and location

Comments:

Are there any water wells within 1/4 mile of the injection site? 30 TAC §331.84(d)

NA Yes No

Is the permittee monitoring the specified wells within 1/4 mile of the injection site every three months? 30 TAC §331.84(d)

NA Yes No

Comments:

Injection fluid analyzed for physical and chemical characteristics with sufficient frequency? 30 TAC §331.84(a)

NA Yes No

Comments:

Are the injection pressure, injection volumes, and production volume recorded? 30 TAC §331.84(b)

NA Yes No

Comments:

Are pressure gauges on each injection well or on injection manifold? 30 TAC §331.84(c)

NA On each injection well on injection manifold

Comments: _____

Ponds/Waste Storage Tanks

Monitoring frequency:

Pond: Liner _____ Leak Detection System _____ Freeboard _____

Transmission lines _____

Tank condition _____ Level _____

Is permittee in compliance with the inspection requirements Yes No

Comments: _____

MONITOR WELL EXCURSION

Are there any excursions since the last investigation?

NA Yes No

(Monthly Remedial Action Report (30 TAC §331.65(f)), Groundwater Analysis Report (30 TAC §331.65(g) & 30 TAC §331.106(2)), Verifying Analysis (30 TAC §331.105(3)), Sampling Frequency when Mining Solutions present (30 TAC §331.105(4)), Remedial Action for Excursion (30 TAC §331.106), Notification (30 TAC §331.106(1)), Clean-Up (30 TAC §331.106 (A) and (B))

Is the permittee in compliance with the above requirements?

NA Yes No

Comments: _____

GROUNDRESTORATION

Are the PAAs for each mine area contain a restoration table?
30 TAC §331.107(a)

NA Yes No

Comments: _____

Has the permittee notified the Commission when the mining of a production area was completed?

30 TAC §331.107(b)

NA Yes No

Comments:

Has the aquifer/groundwater restoration conducted by the permittee after mining completion? 30 TAC §331.107(b)

NA Yes No

Comments:

Is the aquifer/groundwater restoration for each mine area accomplished in accordance with the timetable specified in currently approved mine plan? 30 TAC §331.107(c)

NA Yes No

Comments:

Are the semi-annual restoration progress reports submitted by the permittee to the commission?
30 TAC §331.107(d)

NA Yes No

Comments:

Is the stability sampling performed by the permittee during restoration as required?
30 TAC §331.107(e)

NA Yes

Comments:

Are the restoration values listed in the restoration table for a production area achieved by the permittee?
30 TAC §331.107(f)

NA Yes No

Comments:

Has the permittee submitted a restoration table amendment to the Commission?

NA Yes No

Comments: _____

CLOSURE STANDARDS / PLUGGING AND ABANDONMENT

Has the permittee plugged and abandoned any well since the last investigation?

NA Yes No

Is the permittee in compliance with the plugging and abandonment requirements?

(30 TAC §331.46(d), 30 TAC §331.46(i), 30 TAC §331.144/Approval of Plugging and Abandonment / Certification from the Owner or Operator and an Independent Registered Professional Engineer for Plugging and Abandonment)

NA Yes No

Comments: _____

SPILLS / INCIDENTS

Have there been any spill / incidents since the last investigation?

NA Yes No

Comments: _____

Is the permittee in compliance with spill / incidents reporting requirements to the Commission?

NA Yes

Comments: _____

Alarm System

Describe Permittee's Alarm System for the processing plant/production Areas _____

Frequency of Alarm Test by the Permittee _____

Date of recent Alarm Test and the results _____

REPORTING REQUIREMENTS

Is an updated map for all newly constructed or newly discovered wells submitted by the permittee annually to the Executive Director?

30 TAC §351.85(a) NA Yes

Comments:

Are results of required monitoring maintained on site?
30 TAC §331.85(b)

NA Yes

Comments:

Are results of mechanical integrity test and any other periodic test reported to the executive director?
30 TAC §331.85(c)

NA Yes

Comments:

Is monitoring reported on a project or field basis?
30 TAC §331.85(d)

NA Yes

Comments:

Are the monitoring data for monitor wells completed in the injection zone reported quarterly to the Executive Director no later than 10th day following report period?
30 TAC §331.85(e)

NA Yes

Comments:

REPORTS TO THE COMMISSION

Is the permittee in compliance with the reporting requirements to the Commission?

NA Yes No

Comments:

FINANCIAL ASSURANCE FOR CLASS III WELLS

Is the permittee in compliance with the financial assurance requirements?

30 TAC §331.15 (Financial Assurance for Class III Wells), 30 TAC §37.7301-7051 (Financial Assurance for UIC Wells), 30 TAC §331.142 (Financial Assurance for Plugging and Abandonment), 30 TAC §331.143 (Cost Estimate for Plugging and Abandonment)

NA Yes No

Comments: _____

OBSERVATIONS DURING SITE AREA INSPECTION

Date and Company Representative (including Title) present during site inspection _____

Automatic Shutoff Systems for the processing plant/production areas NA Yes No

If yes, describe the system _____

PRODUCTION AREA S (PAs)/ WELL FIELDS

Condition of PAs:

Overgrown Vegetation (safety hazard); Well accessible for inspection/sampling, unwanted debris in the PAs, any activities (well construction, exploration activities, plugging activities, sampling etc.) in progress, while inspecting a PA, request the permittee to demonstrate how the permittee confines the mining solution for a specific PA; include any other observations, including safety hazards.

PRODUCTION / INJECTION / MONITOR WELLS/BASELINE Wells

Condition of wells:

Wells capped (include type of cap), cemented to the surface, labeled, integrity of the well (i.e., aboveground casing intact, wiggle to determine if the well is broken below the surface)

Comments: _____

Pressure gauges on each injection well or on injection manifold? _____

Maximum allowable injection pressure marked on each injection well or on injection manifold?

NA Yes No

Comments: _____

Maximum allowable injection pressure in compliance with rule/permit requirements?

NA Yes No

Comments: _____

TRANSMISSION LINES

Are transmission lines buried or above ground? _____

Type _____

Method of Monitoring: Visual inspection Other

Condition of transmission lines during the investigation? Leaks Broken Other

Comments: _____

Wastewater Storage Method

Pond Tanks

No. of Ponds No. of Tanks

Pond:

Depth in FT _____ Dimensions in FT _____

No. of Leak Detection System (LDS) _____ Type of LDS _____

Fluid detected Yes No (Permittee should check the LDS in presence of the investigator)

Single Liner Double Liner

Condition of the Liner _____

Pond Freeboard marked on the liner or on a stick located in the middle of the pond (describe)

Pond Freeboard in compliance with permit requirement Yes No

Comments: _____

Wastewater Storage Tank

Capacity in Gallons _____ Length in FT _____ Diameter in FT _____

Type _____

Tank Equipped with Level Indicator? Yes No

Alarm goes off when tank reaches certain level? Yes No

Tank level monitored from a control room? Yes No _____

Frequency of monitoring _____

Condition of tank(s) _____

Comments: _____

Groundwater Sampling

Samples collected during the investigation?

NA Yes No

Sample Type _____ No. of samples _____

Sample Location

Comments: _____

Photos

Photos taken during the investigation?

NA Yes No

Comments: _____

