

EPA REGION 8'S RESPONSE TO PETITION FOR REVIEW

**ATTACHMENT FF**

June 2017 letters to several Tribes inviting  
consultation

Administrative Record Document Nos. 734-738



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
[www.epa.gov/region8](http://www.epa.gov/region8)

JUN 09 2017

Ref: 8WP-SUI

Honorable Harold Frazier, Chairman  
Cheyenne River Sioux Tribe  
P.O. Box 590  
Eagle Butte, South Dakota 57625-0590

Re: U.S. Environmental Protection Agency Region 8 Underground Injection Control (UIC)  
Program Invitation for Consultation on the Dewey-Burdock Uranium Recovery Site  
Near Edgemont, South Dakota

Dear Chairman Frazier:

The U.S. Environmental Protection Agency Region 8 Underground Injection Control Program is requesting to schedule a consultation in Eagle Butte, South Dakota with you, and any other representatives of the Cheyenne River Sioux Tribe you would like to include, on the proposed Dewey-Burdock uranium in-situ recovery (ISR) site in the southern Black Hills near Edgemont, South Dakota. The location of the Dewey-Burdock site is shown in the enclosed Figure 1.

On March 6, 2017, the EPA issued two Draft Permits to Powertech (USA) Inc.: one Class III injection well area Permit for the ISR of uranium in Inyan Kara aquifers, and a second, deep Class V injection well area Permit for the disposal of treated ISR process waste water into the Minnelusa aquifer. The EPA also proposed an aquifer exemption record of decision to exempt uranium-ore-bearing portions of the Inyan Kara aquifers.

The EPA recently held public hearings to offer the opportunity for the public to present verbal comments on the UIC Draft Permits and proposed aquifer exemption decision. In the written comments received to date and at the public hearings, many members of the public urged the EPA to conduct tribal consultation. The EPA has attempted to schedule consultation meetings with the Tribe on several occasions since we received your letter on December 23, 2015, requesting consultation with the EPA in Eagle Butte, South Dakota. We are again reaching out to you to offer a meeting with Cheyenne River Sioux Tribe Leadership to consult with the EPA on these actions.

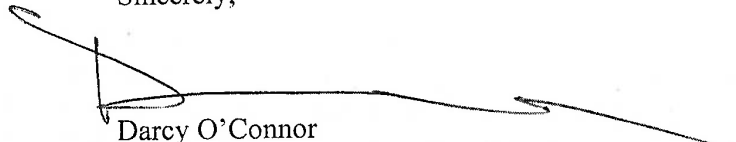
Please have your staff contact UIC Unit Manager Douglas Minter at your earliest convenience if you would like to schedule a consultation meeting with us. Also, if the Tribe would like to include National Historic Preservation Act issues within the scope of this consultation, please send Mr. Minter the name and contact information of your designated point of contact for NHPA section 106 consultation. Mr. Minter can be reached at (800) 227-8917, extension 312-6079; at (303) 312-6079; or at [minter.douglas@epa.gov](mailto:minter.douglas@epa.gov).

We will call your office within 14 days to discuss options for tribal consultation meetings. At that time, we will request that you provide a point of contact from your Tribe so we can keep you informed as the EPA moves forward with this consultation process.

**Confidentiality:** We understand that the Cheyenne River Sioux Tribe may raise issues in consultation that should be kept confidential and nonpublic. During the course of our consultation process, if there is information that you would like to provide, but that you believe should remain confidential, please contact us by phone, and we will explore options for keeping the information confidential in accordance with 36 CFR § 800.11(c). As we move forward with the consultation process, please be aware that any information you provide to the EPA in writing will become a part of the public record unless other arrangements are made to maintain confidentiality.

**Background Information on the Dewey-Burdock Site:** For additional information about the proposed Dewey-Burdock site, please see the enclosed page entitled *Background Information on the Proposed Dewey-Burdock Uranium In-Situ Recovery Site* and enclosed Figures 1 through 5. The full administrative record for the EPA proposed actions is found on the EPA website at: <https://www.epa.gov/uic/extension-public-comment-period-dewey-burdock-class-iii-and-class-v-injection-well-draft-area-0>.

Sincerely,



Darcy O'Connor  
Assistant Regional Administrator  
Office of Water Protection

Enclosures (6)

cc: Mr. Steven Vance, Tribal Historic Preservation Officer  
Mr. Dave Nelson, Environmental Director



## **Background Information on the Underground Injection Control Draft Permits for the Dewey-Burdock Uranium Recovery Site**

The Dewey-Burdock site is located north of Edgemont, South Dakota, in Fall River and Custer Counties as shown in the enclosed Figure 1. The EPA Region 8 UIC Program has issued Class III and Class V Draft Injection Well Permits for this site to Powertech (USA) Inc. The Class III injection wells are related to uranium recovery in Inyan Kara aquifers; the Class V injection wells are deep wells for the disposal of treated process wastewater into the Minnelusa aquifer. The Class III Draft Permit authorizes up to 14 injection wellfields shown in Figure 2. The EPA has proposed the exemption of uranium-bearing portions of the Inyan Kara aquifers to allow injection activities related to uranium recovery. The proposed aquifer exemption boundary is shown in Figure 2. The Class V Draft Permit authorizes up to four (4) Minnelusa injection wells; however, Powertech has proposed two injection wells at this time at the locations shown in Figure 3.

Powertech proposes using ponds to treat and store treated water that will be injected into the Class V deep injection wells. The locations and configuration of the treatment ponds are shown in Figure 4. These ponds are not regulated under the UIC Program. Powertech will submit an application for review and approval of the pond construction design plan to the EPA Region 8 Air Program. The ponds are not designed to be evaporation ponds, although some amount of evaporation will occur during storage of the treated water before it is injected into the deep injection wells. The evaporation process does not involve release of heavy metals, including uranium or other radioactive elements, into the air. The EPA has information about radiation at <https://www.epa.gov/radiation>.

The total proposed project area consists of approximately 10,580 acres (4,282 ha) east and west of the Dewey Road (County Road 6463), including portions of Sections 1-5, 10-12, 14 and 15 in Township 7 South, Range 1 East and Sections 20, 21, 27, 28, 29, and 30-35 in Township 6 South, Range 1 East, Black Hills Meridian. The surface area that will actually be impacted by the uranium ore processing plants, the 14 proposed uranium in-situ recovery well fields, up to four authorized deep injection wells, treatment and storage ponds, roads and other surface-disturbing facilities is less than the 10,580-acre project area. The enclosed Figure 1 is a map showing the project site location. Figure 2 is a map showing the locations of the proposed wellfields containing Class III injection wells and the site project boundary. Figure 3 shows the locations for the two currently proposed deep Class V injection wells. Figure 5 shows a stratigraphic cross section of geologic formations at the Dewey Burdock site and the proposed injection zones for both the Class III and Class V injection wells.

The administrative record for Dewey-Burdock Class III and Class V Draft Permits are available for public review on the EPA Region 8 UIC Program website at: <https://www.epa.gov/uic/extension-public-comment-period-dewey-burdock-class-iii-and-class-v-injection-well-draft-area-0>. The EPA's proposed National Historic Preservation Act (NPHA) 106 Process is also included on the administrative record website at: [https://www.epa.gov/sites/production/files/2017-03/documents/draft\\_national\\_historic\\_preservation\\_act .pdf](https://www.epa.gov/sites/production/files/2017-03/documents/draft_national_historic_preservation_act.pdf).

# Dewey-Burdock Location Map

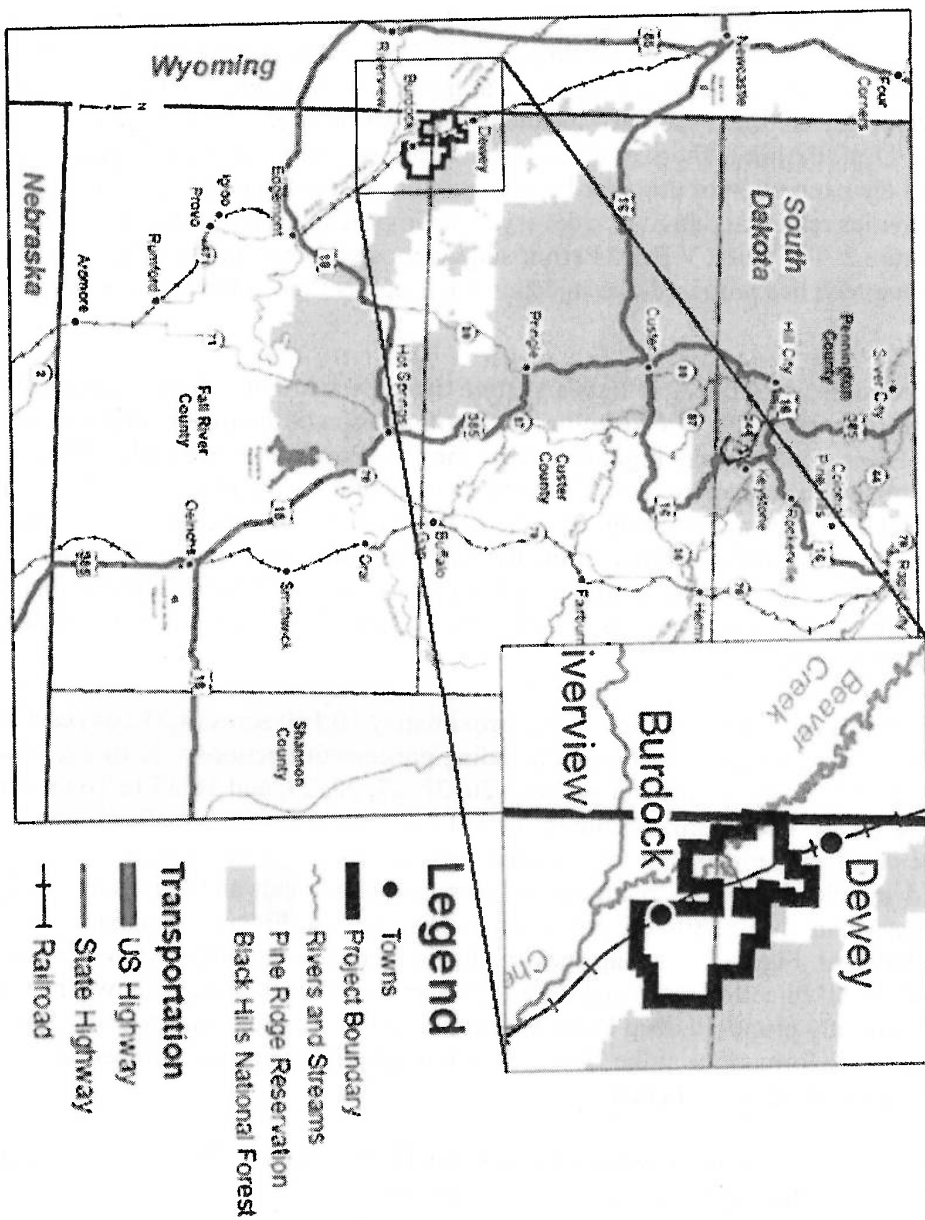


Figure 1. Map showing the location of the proposed Dewey-Burdock uranium recovery site.

# Dewey Burdock Proposed Class III Injection Wellfields and Exemption Boundary

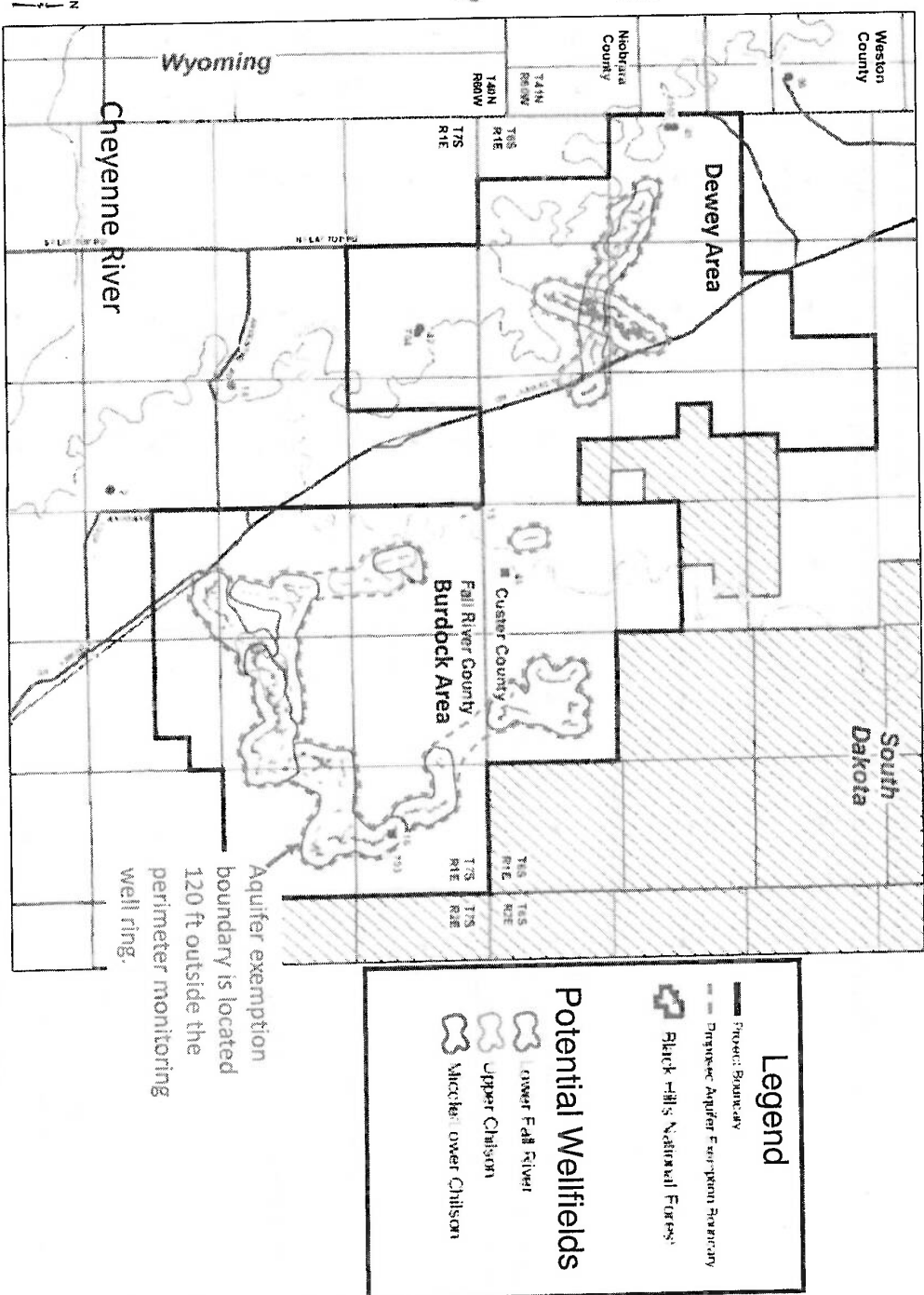
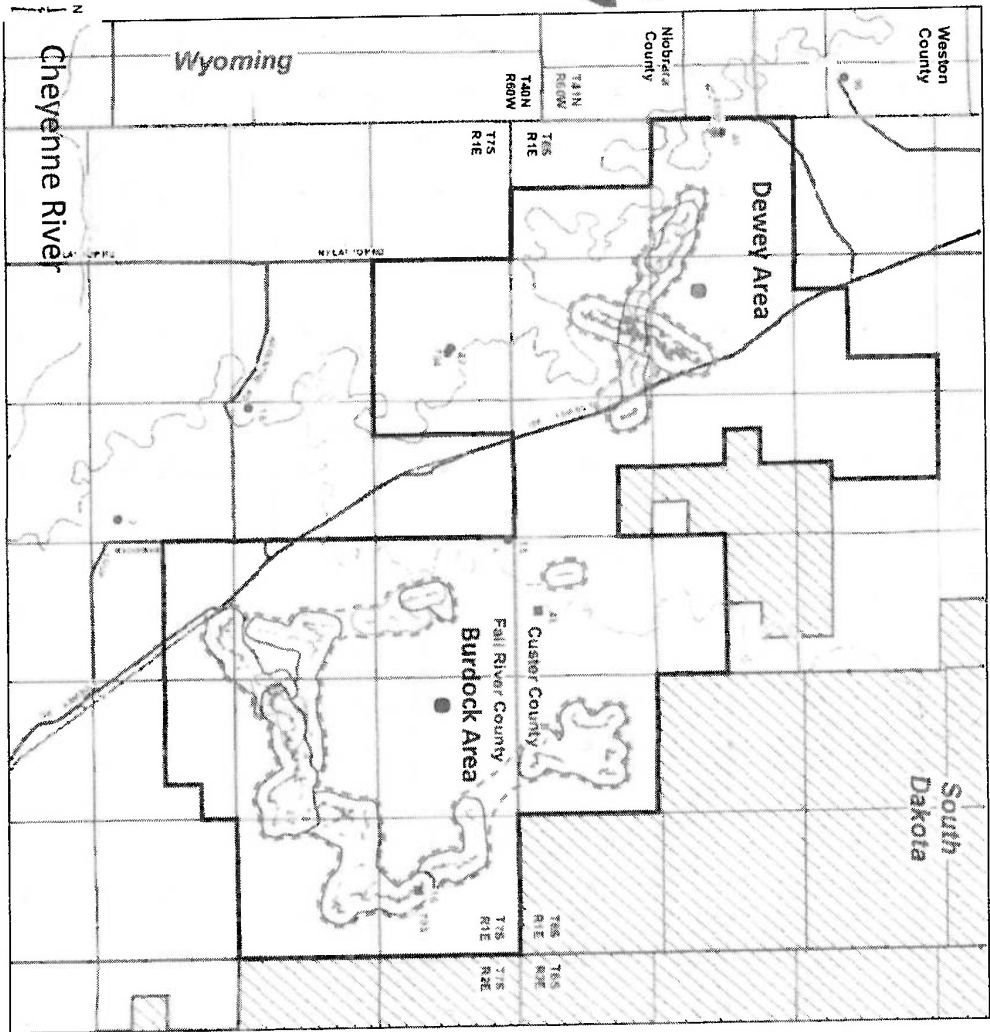


Figure 2. Map showing the locations of the proposed wellfields containing Class III injection wells, the proposed aquifer exemption boundary and the project boundary.

# Dewey Burdock Proposed Class V Deep Injection Well Locations



## Legend

- Proprietary Boundary
- Proprietary Aquifer Boundary
- Black Hills National Forest

## Potential Wellfields

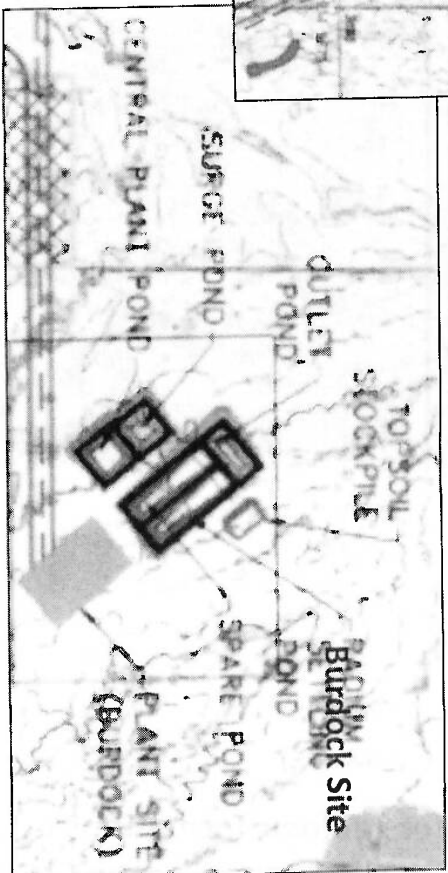
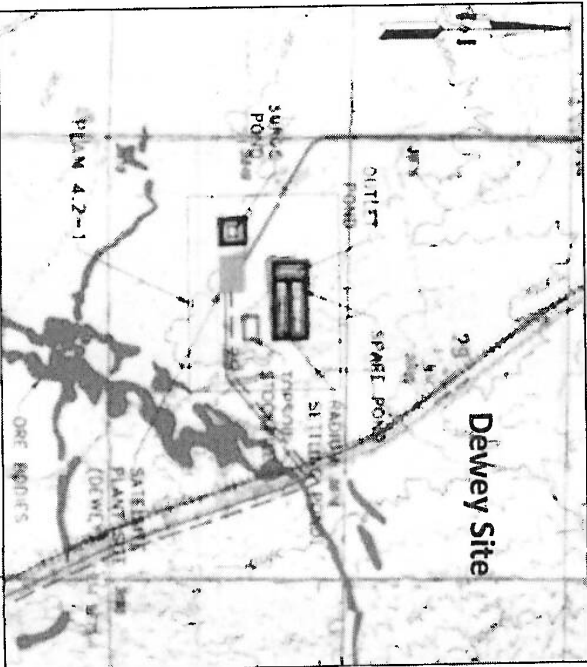
- Over Fall River
- Upper Cretaceous
- Middle Over Cretaceous

- Deep Injection Well #1
- Deep Injection Well #3

Figure 3. Map showing locations for the two currently proposed Class V deep injection wells. Powertech may construct up to four deep injection wells.

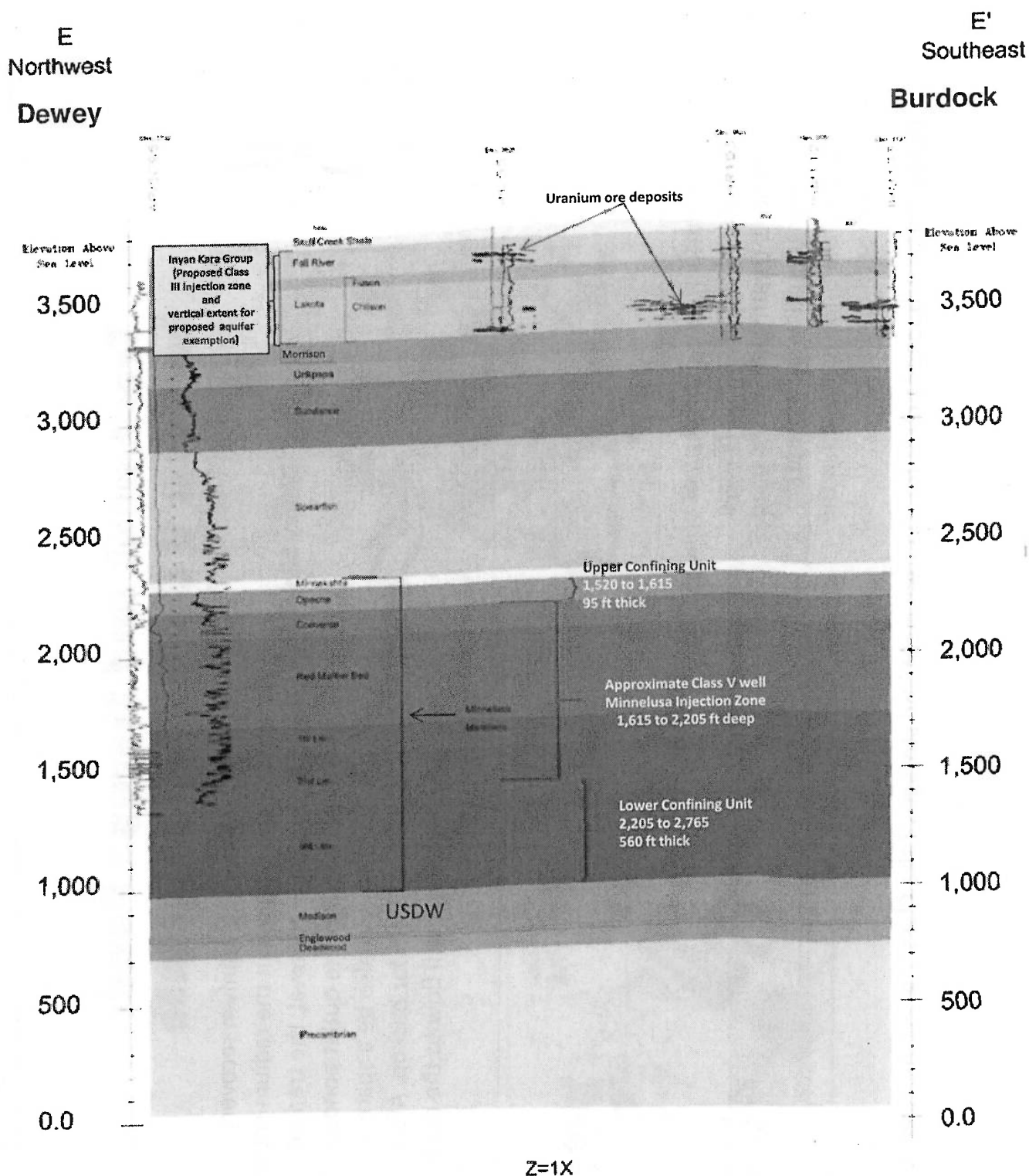
## Treatment and Storage Ponds for Class V Deep Well Injectate

Waste fluids from the uranium recovery process will be treated in the radium settling ponds. After radium removal, the treated water will be stored in the outlet ponds and surge ponds. There will also be a spare radium treatment pond for backup. After treatment, the water will flow to the deep injection wells.



The Burdock Area central plant pond will store brine from the reverse osmosis treatment process used during groundwater restoration before the brine is treated in the radium settling ponds.

Figure 4. The proposed ponds for the treatment and storage of the Class V deep injection well injectate.



**Figure 5. Stratigraphic cross-section of geologic formations present at the Dewey-Burdock site and proposed injection zones for the Class III and Class V injections wells.**



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**JUN 09 2017**

Ref: 8WP-SUI

Honorable Westin Scott, President  
Oglala Sioux Tribe  
P.O. Box 2070  
Pine Ridge, South Dakota 57770-2070

Re: U.S. Environmental Protection Agency Region 8 Underground Injection Control (UIC)  
Program Invitation for Consultation on the Dewey-Burdock Uranium Recovery Site  
Near Edgemont, South Dakota

Dear President Scott:

The U.S. Environmental Protection Agency Region 8 Underground Injection Control Program is contacting you to request a meeting in order to continue consultation with the Oglala Sioux Tribal Leadership on the proposed Dewey-Burdock uranium in-situ recovery (ISR) site in the southern Black Hills near Edgemont, South Dakota. The location of the Dewey-Burdock site is shown in the enclosed Figure 1. We would like to schedule a consultation meeting with you and any other representatives of the Oglala Sioux Tribe you would like to include.

On March 6, 2017, the EPA issued two Draft Permits to Powertech (USA) Inc.: one Class III injection well area Permit for the ISR of uranium in Inyan Kara aquifers, and a second, deep Class V injection well area Permit for the disposal of treated ISR process waste water into the Minnelusa aquifer. The EPA also proposed an aquifer exemption record of decision to exempt uranium-ore-bearing portions of the Inyan Kara aquifers.

The EPA recently held public hearings to offer the opportunity for the public to present verbal comments on the UIC Draft Permits and proposed aquifer exemption decision. In the written comments received to date and at the public hearings, many members of the public urged the EPA to conduct tribal consultation. Also, the EPA has met with Oglala Sioux Tribal Leadership on several occasions since June 2015, these meetings occurred previous to your administration as President. Therefore, we are reaching out to you to offer a meeting with Oglala Sioux Tribal Leadership to continue consultation with the EPA on these proposed actions.

Please have your staff contact UIC Unit Manager Douglas Minter at your earliest convenience if you would like to schedule a consultation meeting with us. Also, if the Tribe would like to include National Historic Preservation Act issues within the scope of this consultation, please send Mr. Minter the name and contact information of your designated point of contact for NHPA section 106 consultation. Mr. Minter can be reached at (800) 227-8917, extension 312-6079; at (303) 312-6079; or at [minter.douglas@epa.gov](mailto:minter.douglas@epa.gov).

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Sincerely,



Darcy O'Connor  
Assistant Regional Administrator  
Office of Water Protection

Enclosures (6)

cc: Ms. Trina Lone Hill, Tribal Historic Preservation Officer  
Ms. Suzy (Lloydell) Mesteth, Environmental Director



## **Background Information on the Underground Injection Control Draft Permits for the Dewey-Burdock Uranium Recovery Site**

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The total proposed project area consists of approximately 10,580 acres (4,282 ha) east and west of the Dewey Road (County Road 6463), including portions of Sections 1-5, 10-12, 14 and 15 in Township 7 South, Range 1 East and Sections 20, 21, 27, 28, 29, and 30-35 in Township 6 South, Range 1 East, Black Hills Meridian. The surface area that will actually be impacted by the uranium ore processing plants, the 14 proposed uranium in-situ recovery well fields, up to four authorized deep injection wells, treatment and storage ponds, roads and other surface-disturbing facilities is less than the 10,580-acre project area. The enclosed Figure 1 is a map showing the project site location. Figure 2 is a map showing the locations of the proposed wellfields containing Class III injection wells and the site project boundary. Figure 3 shows the locations for the two currently proposed deep Class V injection wells. Figure 5 shows a stratigraphic cross section of geologic formations at the Dewey Burdock site and the proposed injection zones for both the Class III and Class V injection wells.

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## Dewey-Burdock Location Map

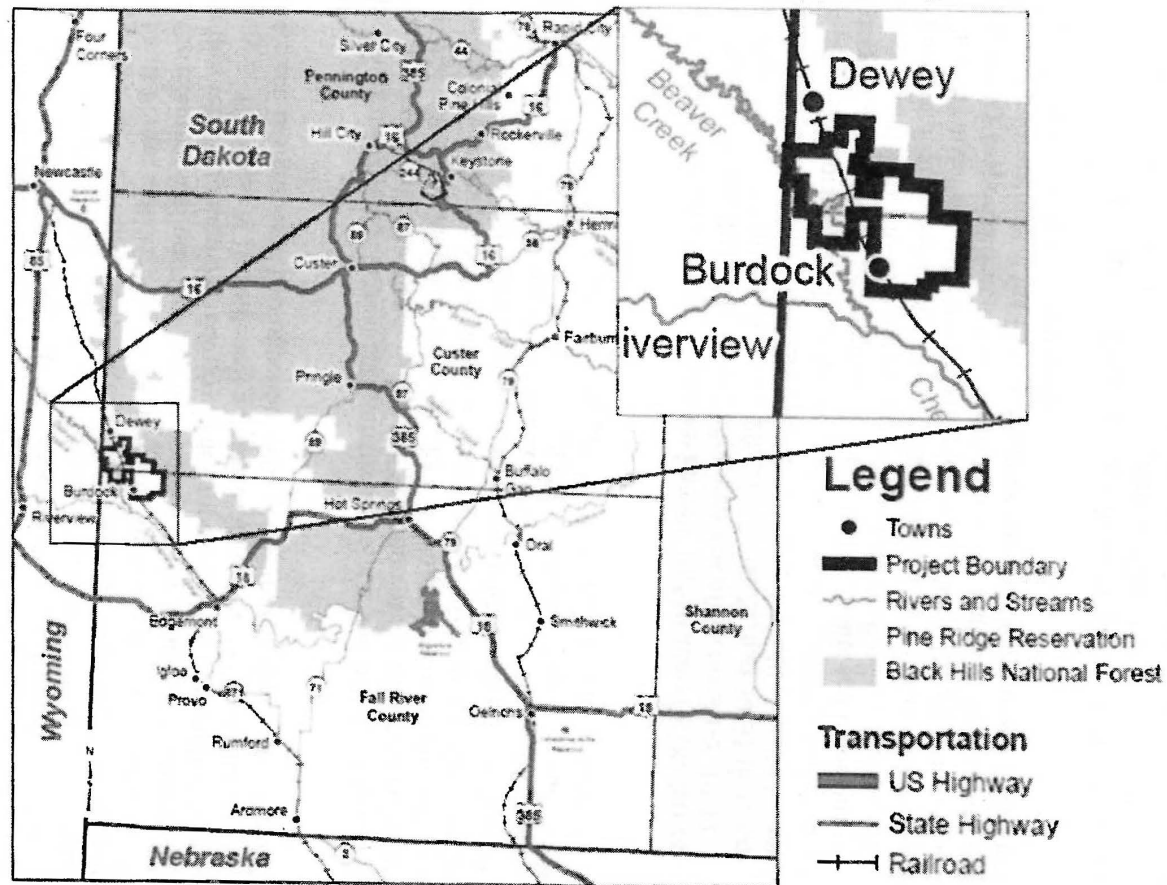
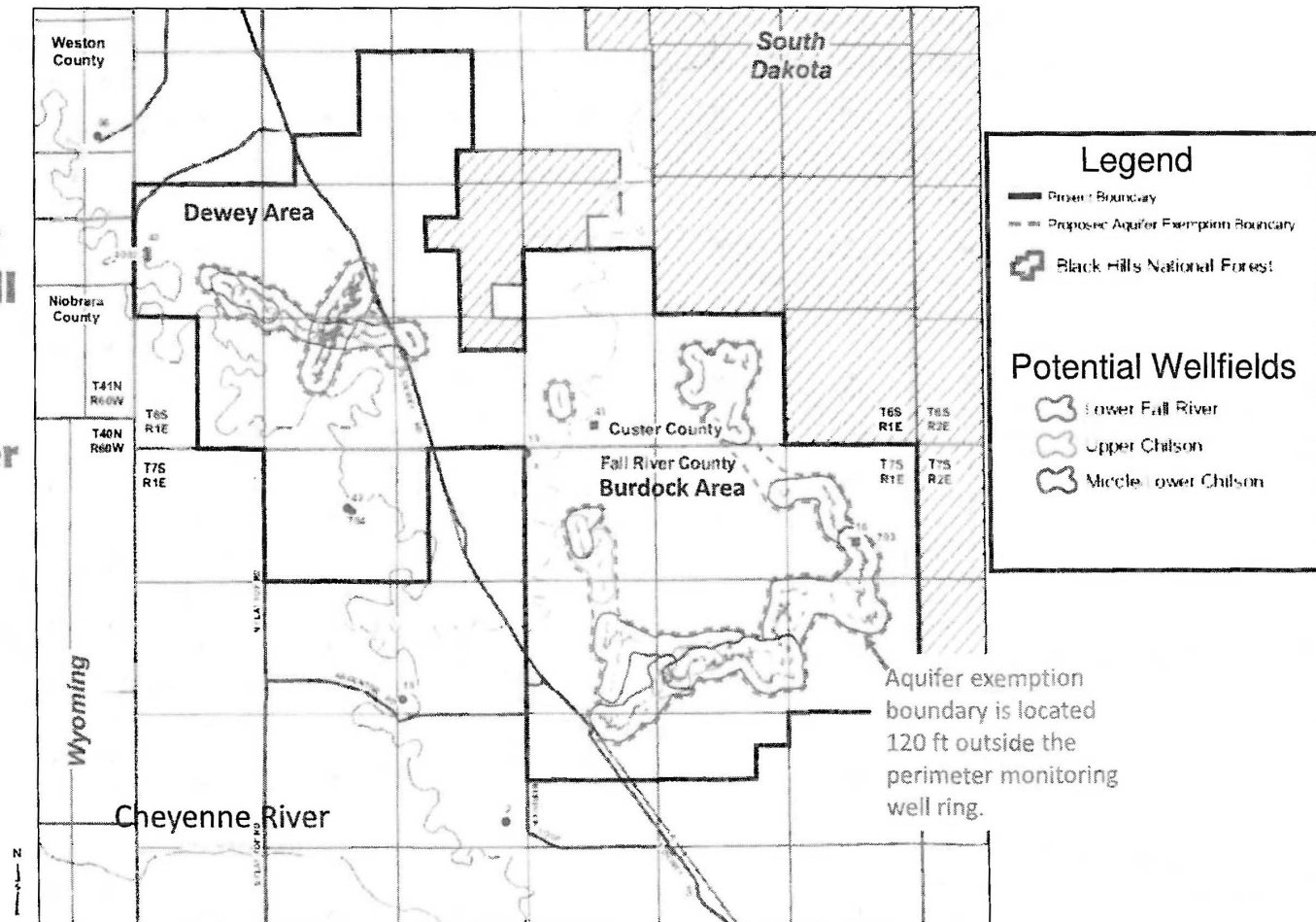


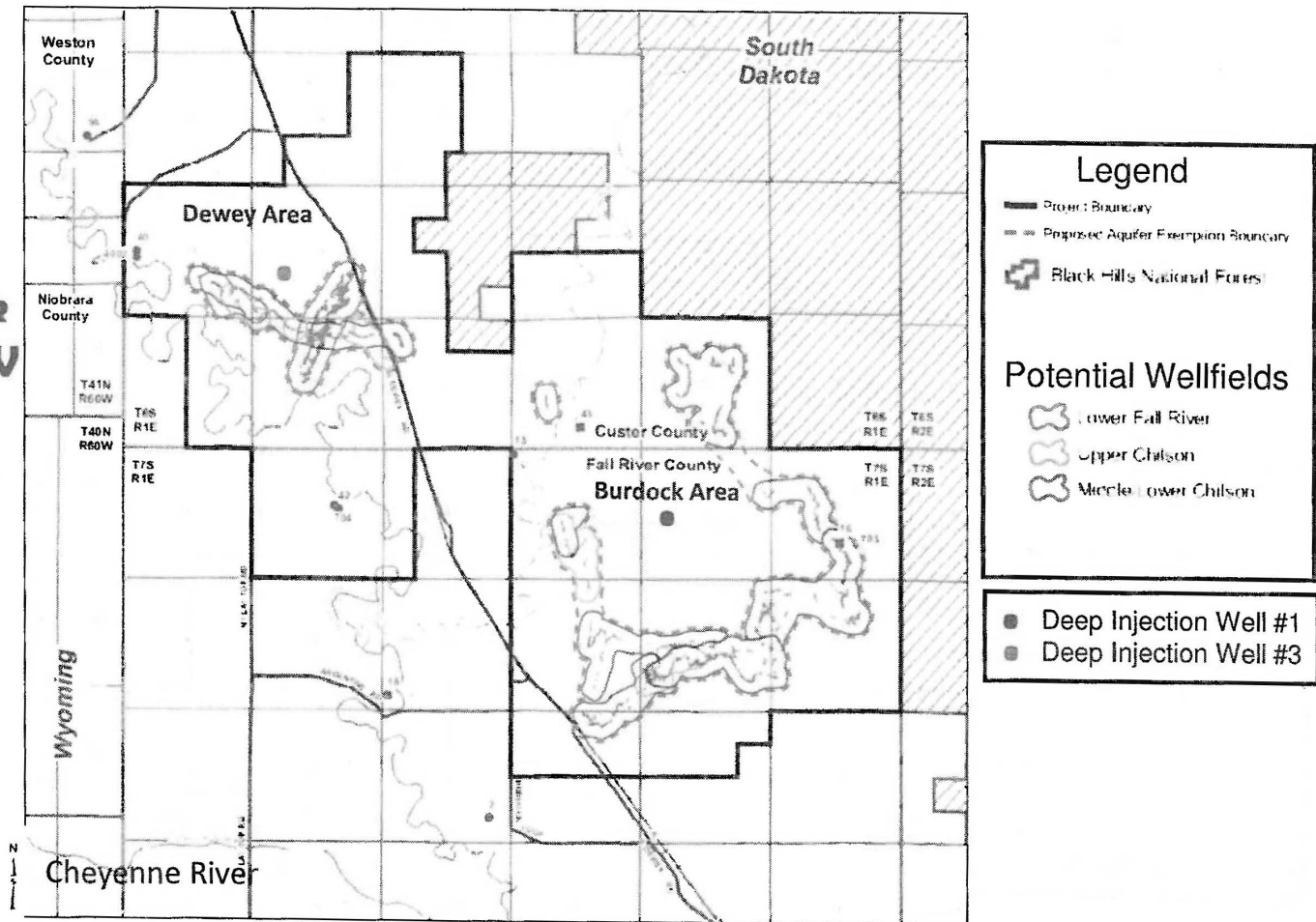
Figure 1. Map showing the location of the proposed Dewey-Burdock uranium recovery site.

**Dewey Burdock  
Proposed Class III  
Injection  
Wellfields and  
Proposed Aquifer  
Exemption  
Boundary**



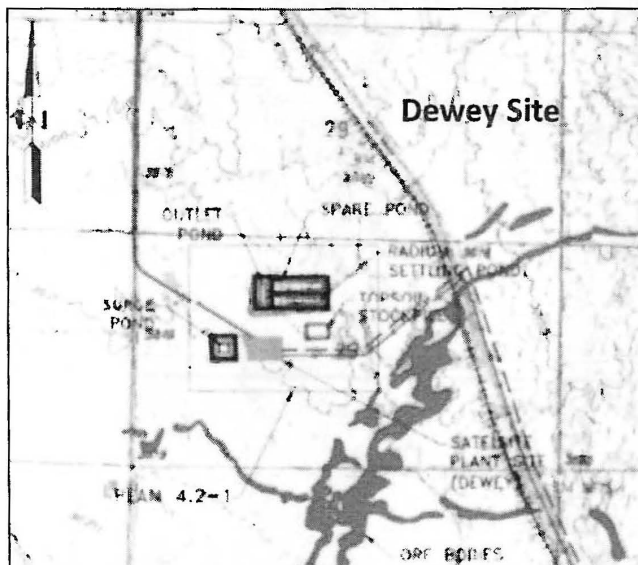
**Figure 2. Map showing the locations of the proposed wellfields containing Class III injection wells, the proposed aquifer exemption boundary and the project boundary.**

# **Dewey Burdock Proposed Class V Deep Injection Well Locations**



**Figure 3. Map showing locations for the two currently proposed Class V deep injection wells. Powertech may construct up to four deep injection wells.**

## Treatment and Storage Ponds for Class V Deep Well Injectate



Waste fluids from the uranium recovery process will be treated in the radium settling ponds. After radium removal, the treated water will be stored in the outlet ponds and surge ponds. There will also be a spare radium treatment pond for backup. After treatment, the water will flow to the deep injection wells.

The Burdock Area central plant pond will store brine from the reverse osmosis treatment process used during groundwater restoration before the brine is treated in the radium settling ponds.

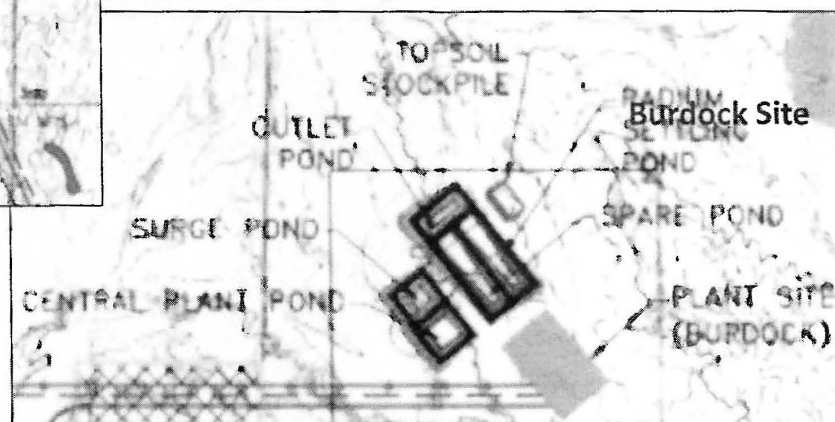


Figure 4. The proposed ponds for the treatment and storage of the Class V deep injection well injectate.





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**JUN 09 2017**

Ref: 8WP-SUI

Honorable Larry Wright Jr., Chairman  
Ponca Tribe of Nebraska  
P.O. Box 288  
Niobrara, Nebraska 68760

Re: U.S. Environmental Protection Agency Region 8 Underground Injection Control (UIC)  
Program Invitation for Consultation on the Dewey-Burdock Uranium Recovery Site  
Near Edgemont, South Dakota

Dear Chairman Wright:

The U.S. Environmental Protection Agency Region 8 Underground Injection Control Program is following up on the letter sent to you on November 25, 2015, to extend another invitation to consult with you, and any other representatives you would like to include, on the proposed Dewey-Burdock uranium in-situ recovery (ISR) site in the southern Black Hills near Edgemont, South Dakota. The location of the Dewey-Burdock site is shown in the enclosed Figure 1.

On March 6, 2017, the EPA issued two Draft Permits to Powertech (USA) Inc.: one Class III injection well area Permit for the ISR of uranium in Inyan Kara aquifers, and a second, deep Class V injection well area Permit for the disposal of treated ISR process waste water into the Minnelusa aquifer. The EPA also proposed an aquifer exemption record of decision to exempt uranium-ore-bearing portions of the Inyan Kara aquifers.

The EPA recently held public hearings to offer the opportunity for the public to present verbal comments on the UIC Draft Permits and proposed aquifer exemption decision. In the written comments received to date and at the public hearings, many members of the public urged the EPA to conduct additional tribal consultation. While beginning in November 2015, the EPA has provided opportunities for tribal input, we are again reaching out to you to ask whether you are interested in consulting with the EPA on these actions.

Please have your staff contact UIC Unit Manager Douglas Minter at your earliest convenience if you would like to schedule a consultation meeting with us. Also, if the Tribe would like to include National Historic Preservation Act issues within the scope of this consultation, please send Mr. Minter the name and contact information of your designated point of contact for NHPA section 106 consultation. Mr. Minter can be reached at (800) 227-8917, extension 312-6079; at (303) 312-6079; or at [minter.douglas@epa.gov](mailto:minter.douglas@epa.gov).

We will call your office within 14 days to discuss options for tribal consultation meetings. At that time, we will request that you provide a point of contact from your Tribe so we can keep you informed as the EPA moves forward with this consultation process.

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Sincerely,



Darcy O'Connor  
Assistant Regional Administrator  
Office of Water Protection

Enclosures (6)

cc: Ms. Rhiannon Clausen, Deputy Director of Tribal Affairs  
Ms. Julia Sage, Environmental Director



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## Dewey-Burdock Location Map

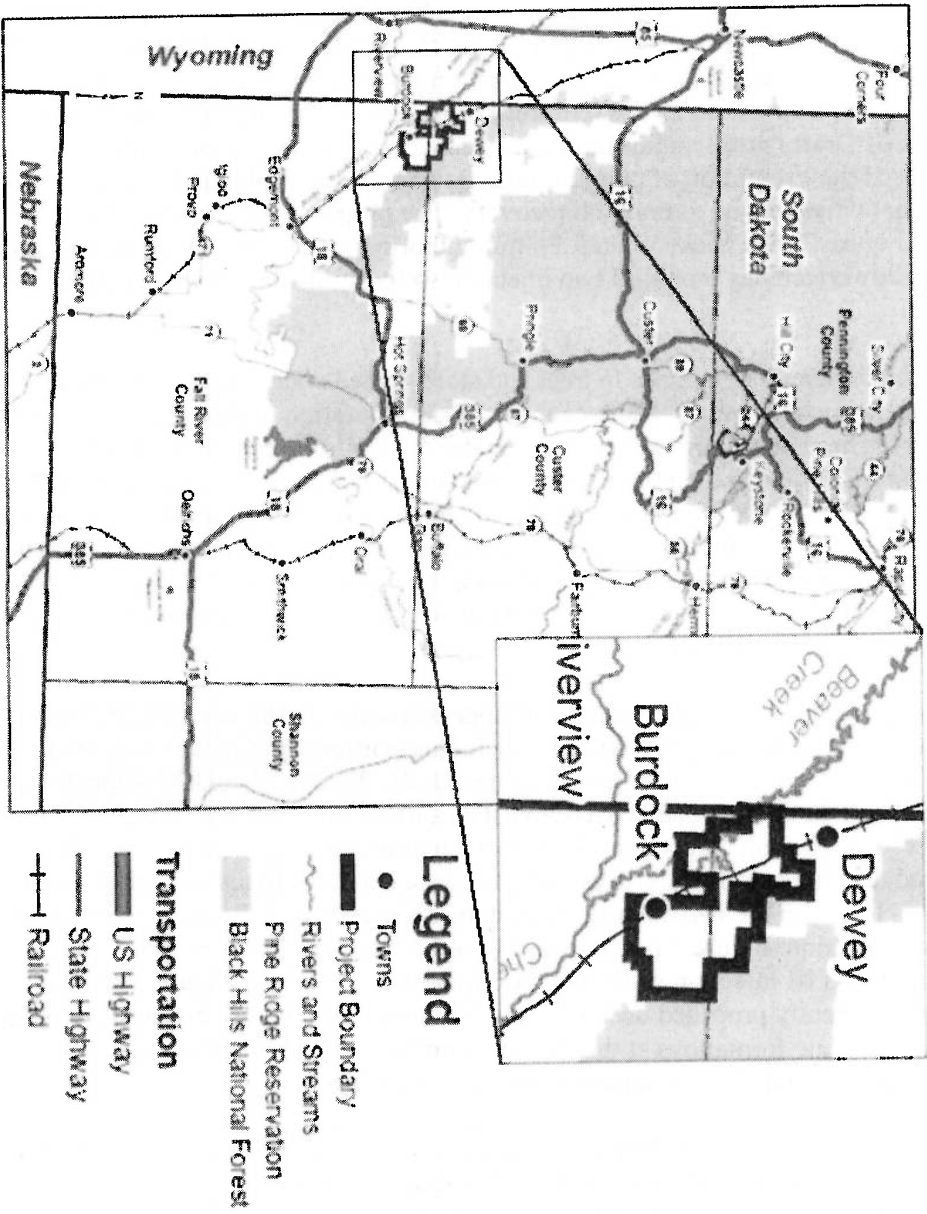


Figure 1. Map showing the location of the proposed Dewey-Burdock uranium recovery site.

# Dewey Burdock Proposed Class III Injection Wellfields and Proposed Aquifer Exemption Boundary

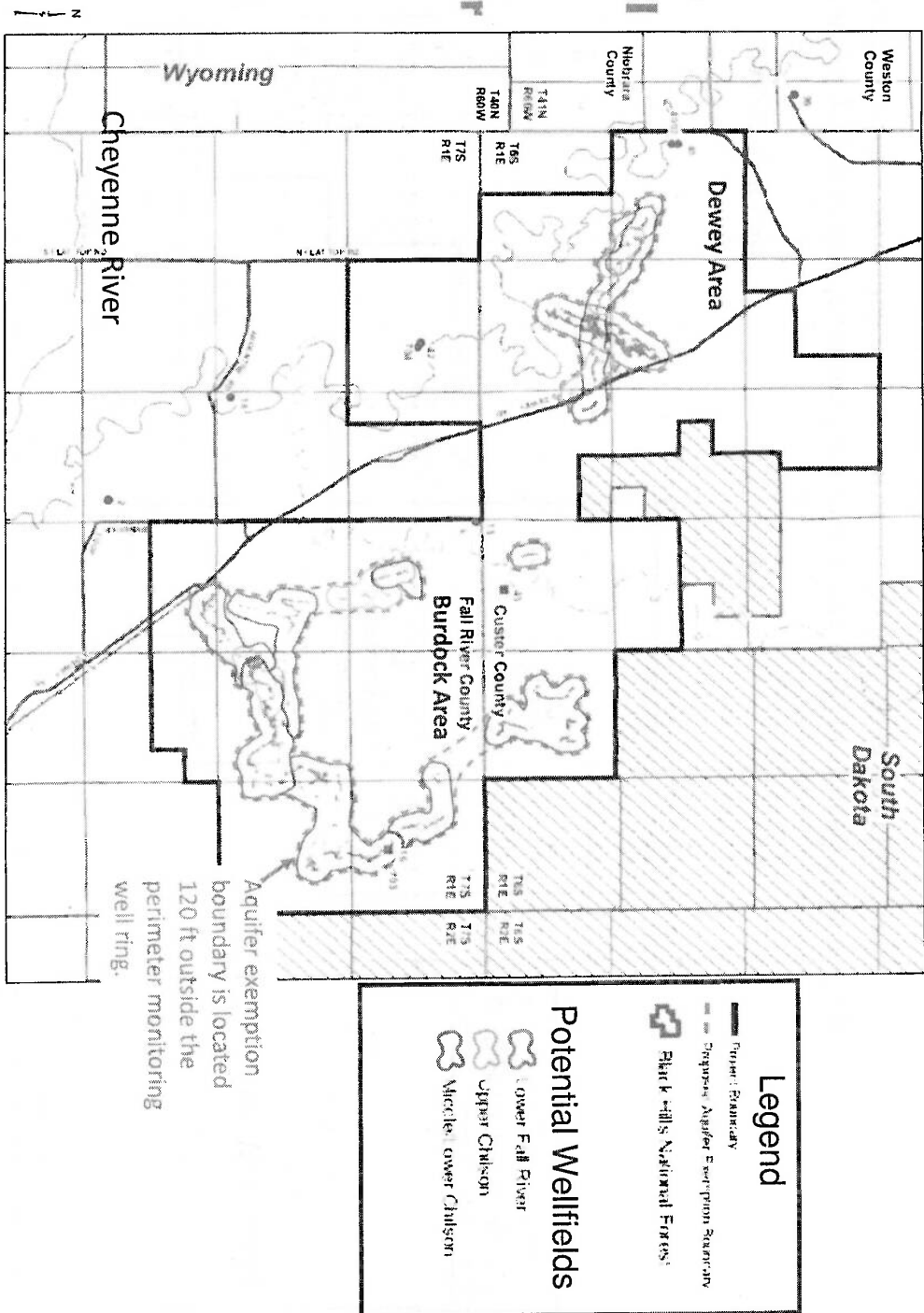
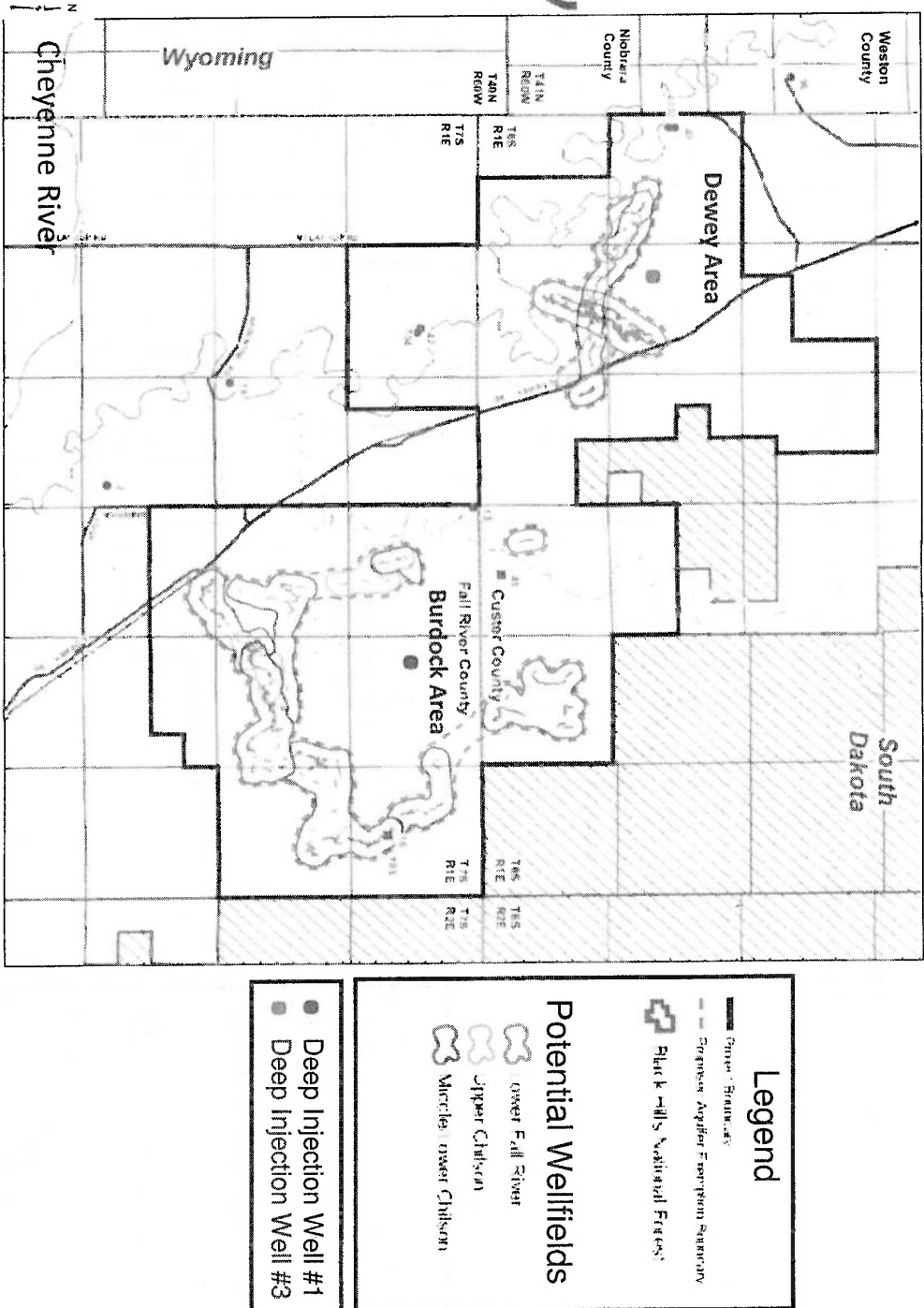


Figure 2. Map showing the locations of the proposed wellfields containing Class III injection wells, the proposed aquifer exemption boundary and the project boundary.

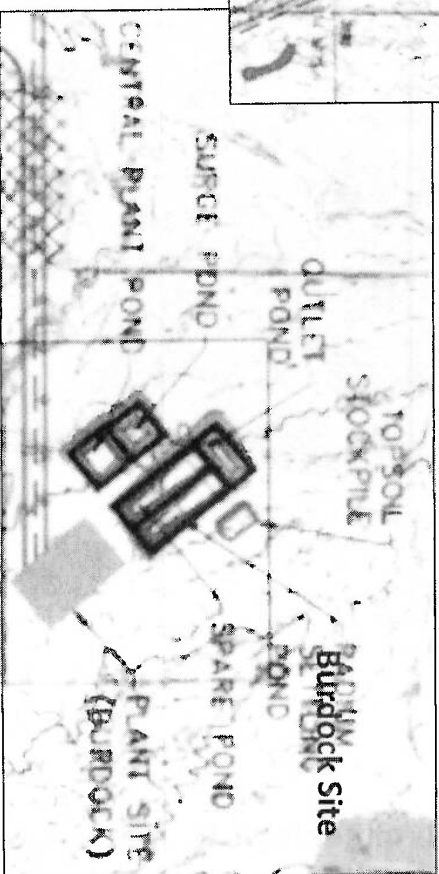
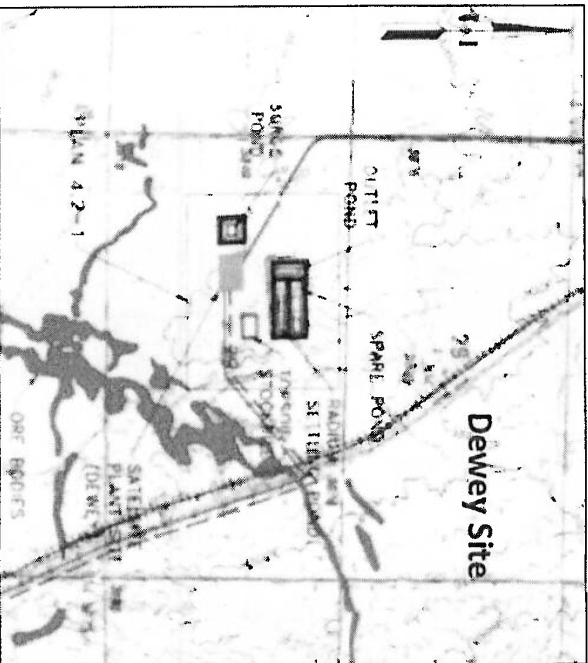
# Dewey Burdock Proposed Class V Deep Injection Well Locations



**Figure 3. Map showing locations for the two currently proposed Class V deep injection wells. Powertech may construct up to four deep injection wells.**

## Treatment and Storage Ponds for Class V Deep Well Injectate

Waste fluids from the uranium recovery process will be treated in the radium settling ponds. After radium removal, the treated water will be stored in the outlet ponds and surge ponds. There will also be a spare radium treatment pond for backup. After treatment, the water will flow to the deep injection wells.



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Figure 4. The proposed ponds for the treatment and storage of the Class V deep injection well injectate.





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Honorable William Kindle, President  
Rosebud Sioux Tribe  
P.O. Box 430  
Rosebud, South Dakota 57570-0430

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Near Edgemont, South Dakota

Dear President Kindle:

The U.S. Environmental Protection Agency Region 8 Underground Injection Control Program is following up on the letter sent to you on November 25, 2015, to extend another invitation to consult with you, and any other representatives you would like to include, on the proposed Dewey-Burdock uranium in-situ recovery (ISR) site in the southern Black Hills near Edgemont, South Dakota. The location of the Dewey-Burdock site is shown in the enclosed Figure 1.

On March 6, 2017, the EPA issued two Draft Permits to Powertech (USA) Inc.: one Class III injection well area Permit for the ISR of uranium in Inyan Kara aquifers, and a second, deep Class V injection well area Permit for the disposal of treated ISR process waste water into the Minnelusa aquifer. The EPA also proposed an aquifer exemption record of decision to exempt uranium-ore-bearing portions of the Inyan Kara aquifers.

The EPA recently held public hearings to offer the opportunity for the public to present verbal comments on the UIC Draft Permits and proposed aquifer exemption decision. In the written comments received to date and at the public hearings, many members of the public urged the EPA to conduct tribal consultation. While beginning in May 2013, the EPA has provided several opportunities for tribal input, in light of the concern expressed by several tribal members, we are again reaching out to you to ask whether you are interested in consulting with the EPA on these actions.

Please have your staff contact UIC Unit Manager Douglas Minter at your earliest convenience if you would like to schedule a consultation meeting with us. Also, if the Tribe would like to include National Historic Preservation Act issues within the scope of this consultation, please send Mr. Minter the name and contact information of your designated point of contact for NHPA section 106 consultation. Mr. Minter can be reached at (800) 227-8917, extension 312-6079; at (303) 312-6079; or at [minter.douglas@epa.gov](mailto:minter.douglas@epa.gov).

We will call your office within 14 days to discuss options for tribal consultation meetings. At that time, we will request that you provide a point of contact from your Tribe so we can keep you informed as the EPA moves forward with this consultation process.

**Confidentiality:** We understand that the Rosebud Sioux Tribe may raise issues in consultation that should be kept confidential and nonpublic. During the course of our consultation process, if there is information that you would like to provide, but that you believe should remain confidential, please contact us by phone, and we will explore options for keeping the information confidential in accordance with 36 CFR § 800.11(c). As we move forward with the consultation process, please be aware that any information you provide to the EPA in writing will become a part of the public record unless other arrangements are made to maintain confidentiality.

**Background Information on the Dewey-Burdock Site:** For additional information about the proposed Dewey-Burdock site, please see the enclosed page entitled *Background Information on the Proposed Dewey-Burdock Uranium In-Situ Recovery Site* and enclosed Figures 1 through 5. The full administrative record for the EPA proposed actions is found on the EPA website at: <https://www.epa.gov/uic/extension-public-comment-period-dewey-burdock-class-iii-and-class-v-injection-well-draft-area-0>.

Sincerely,



Darcy O'Connor  
Assistant Regional Administrator  
Office of Water Protection

Enclosures (6)

cc: Mr. Russell Eagle Bear, Tribal Historic Preservation Officer  
Mr. Ivan Crow Eagle, Environmental Director



## **Background Information on the Underground Injection Control Draft Permits for the Dewey-Burdock Uranium Recovery Site**

The Dewey-Burdock site is located north of Edgemont, South Dakota, in Fall River and Custer Counties as shown in the enclosed Figure 1. The EPA Region 8 UIC Program has issued Class III and Class V Draft Injection Well Permits for this site to Powertech (USA) Inc. The Class III injection wells are related to uranium recovery in Inyan Kara aquifers; the Class V injection wells are deep wells for the disposal of treated process wastewater into the Minnelusa aquifer. The Class III Draft Permit authorizes up to 14 injection wellfields shown in Figure 2. The EPA has proposed the exemption of uranium-bearing portions of the Inyan Kara aquifers to allow injection activities related to uranium recovery. The proposed aquifer exemption boundary is shown in Figure 2. The Class V Draft Permit authorizes up to four (4) Minnelusa injection wells; however, Powertech has proposed two injection wells at this time at the locations shown in Figure 3.

Powertech proposes using ponds to treat and store treated water that will be injected into the Class V deep injection wells. The locations and configuration of the treatment ponds are shown in Figure 4. These ponds are not regulated under the UIC Program. Powertech will submit an application for review and approval of the pond construction design plan to the EPA Region 8 Air Program. The ponds are not designed to be evaporation ponds, although some amount of evaporation will occur during storage of the treated water before it is injected into the deep injection wells. The evaporation process does not involve release of heavy metals, including uranium or other radioactive elements, into the air. The EPA has information about radiation at <https://www.epa.gov/radiation>.

The total proposed project area consists of approximately 10,580 acres (4,282 ha) east and west of the Dewey Road (County Road 6463), including portions of Sections 1-5, 10-12, 14 and 15 in Township 7 South, Range 1 East and Sections 20, 21, 27, 28, 29, and 30-35 in Township 6 South, Range 1 East, Black Hills Meridian. The surface area that will actually be impacted by the uranium ore processing plants, the 14 proposed uranium in-situ recovery well fields, up to four authorized deep injection wells, treatment and storage ponds, roads and other surface-disturbing facilities is less than the 10,580-acre project area. The enclosed Figure 1 is a map showing the project site location. Figure 2 is a map showing the locations of the proposed wellfields containing Class III injection wells and the site project boundary. Figure 3 shows the locations for the two currently proposed deep Class V injection wells. Figure 5 shows a stratigraphic cross section of geologic formations at the Dewey Burdock site and the proposed injection zones for both the Class III and Class V injection wells.

The administrative record for Dewey-Burdock Class III and Class V Draft Permits are available for public review on the EPA Region 8 UIC Program website at: <https://www.epa.gov/uic/extension-public-comment-period-dewey-burdock-class-iii-and-class-v-injection-well-draft-area-0>. The EPA's proposed National Historic Preservation Act (NPHA) 106 Process is also included on the administrative record website at: [https://www.epa.gov/sites/production/files/2017-03/documents/draft\\_national\\_historic\\_preservation\\_act .pdf](https://www.epa.gov/sites/production/files/2017-03/documents/draft_national_historic_preservation_act.pdf).

# Dewey-Burdock Location Map

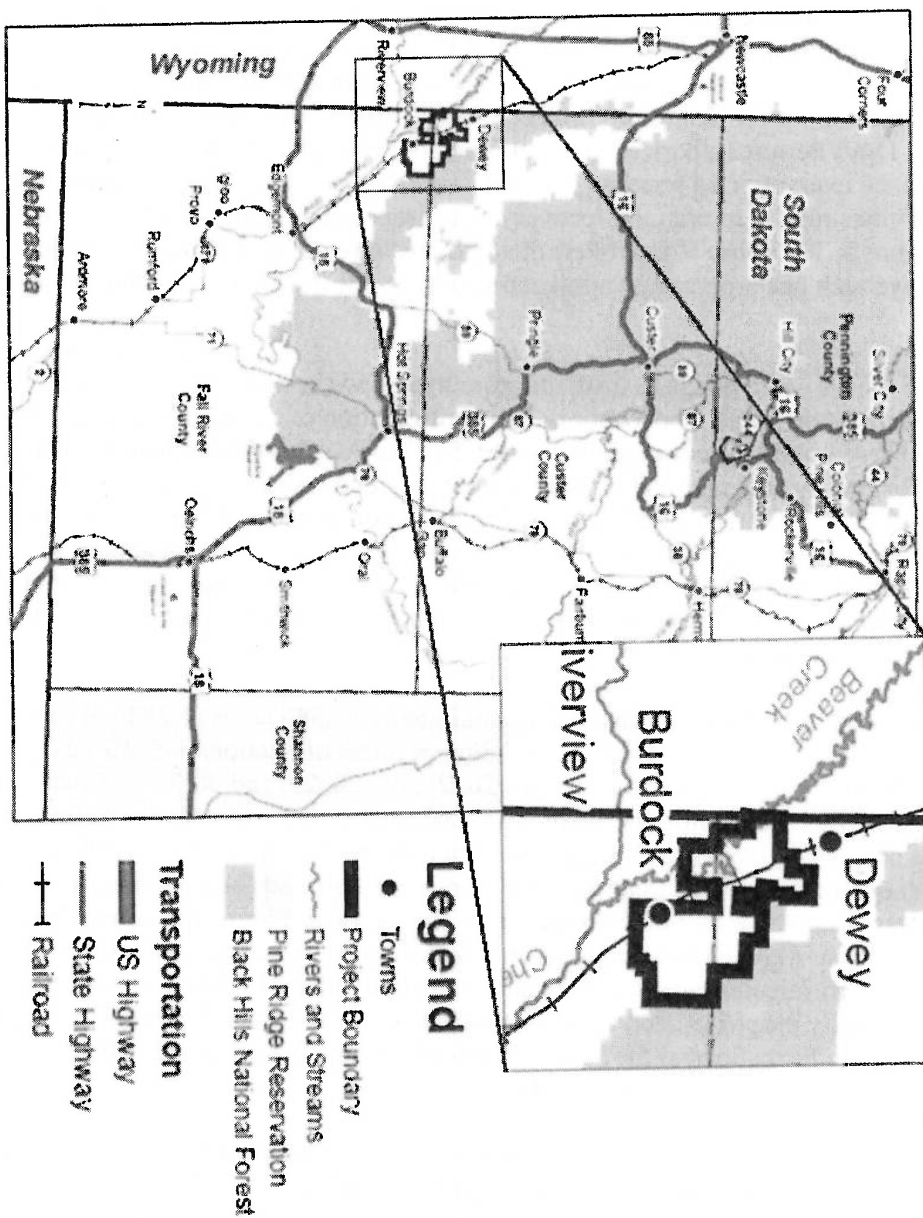


Figure 1. Map showing the location of the proposed Dewey-Burdock uranium recovery site.

# Dewey Burdock Proposed Class III Injection Wellfields and Proposed Aquifer Exemption Boundary

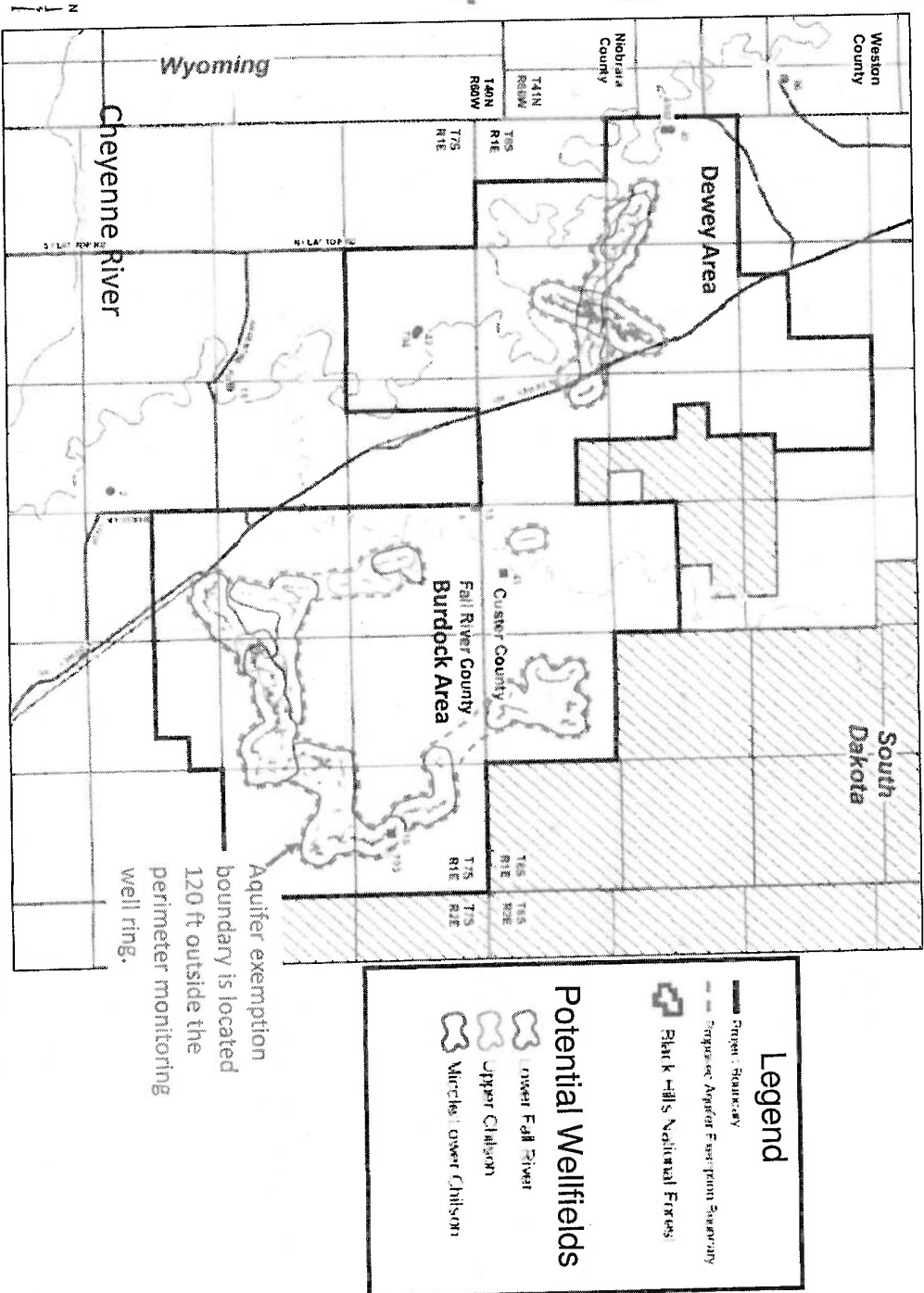
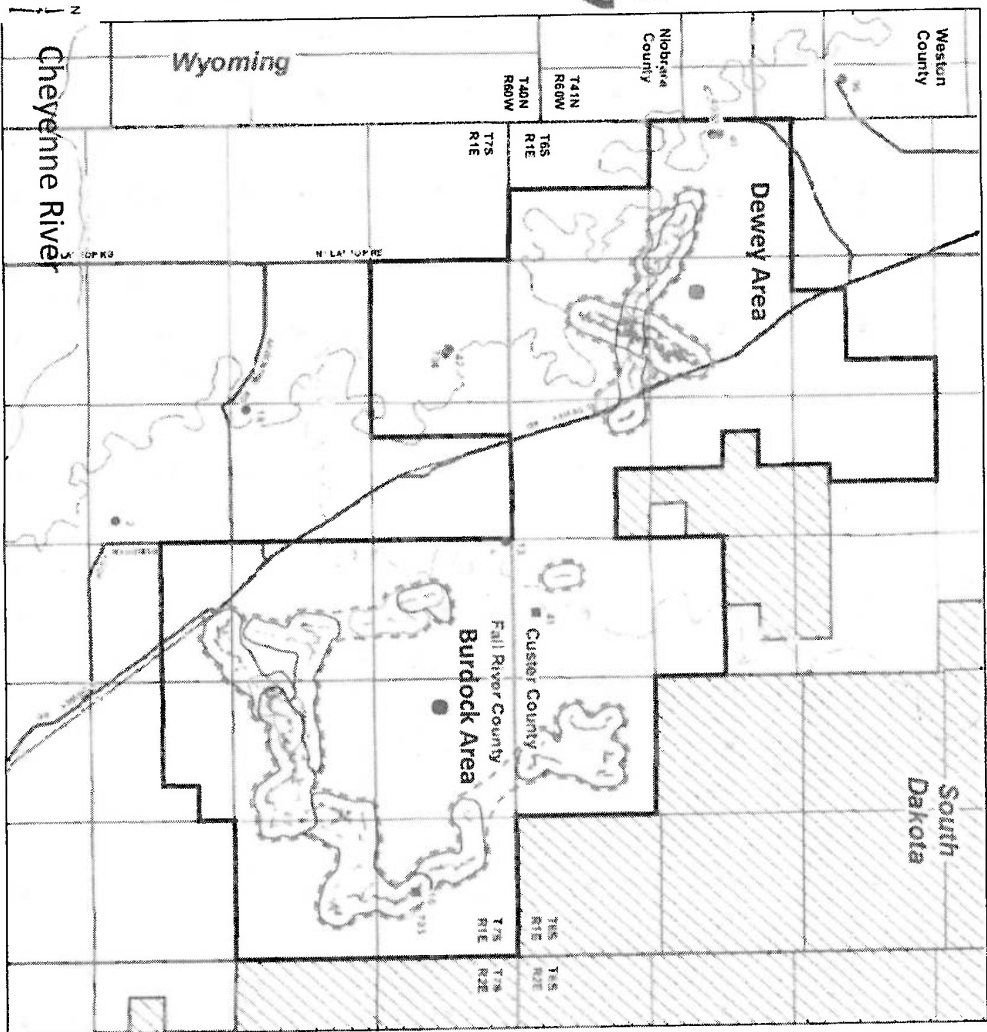


Figure 2. Map showing the locations of the proposed wellfields containing Class III injection wells, the proposed aquifer exemption boundary and the project boundary.

# Dewey Burdock Proposed Class V Deep Injection Well Locations



### Legend

- Proposed Boundary
- Proposed Aquifer Eruption Seminary
- Black Hills National Forest

### Potential Wellfields

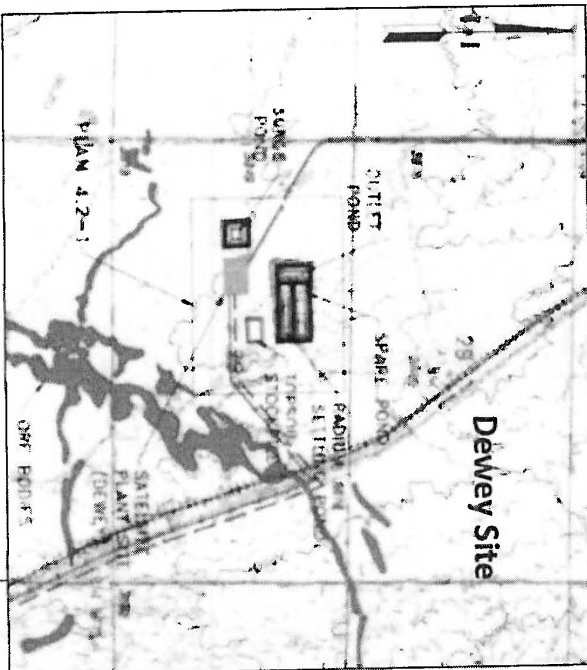
- Lower Fall River
- Upper Chisum
- Mitchell Lower Chisum

- Deep Injection Well #1
- Deep Injection Well #3

Figure 3. Map showing locations for the two currently proposed Class V deep injection wells. Powertech may construct up to four deep injection wells.

# Treatment and Storage Ponds for Class V Deep Well Injectate

Waste fluids from the uranium recovery process will be treated in the radium settling ponds. After radium removal, the treated water will be stored in the outlet ponds and surge ponds. There will also be a spare radium treatment pond for backup. After treatment, the water will flow to the deep injection wells.



The Burdock Area central plant pond will store brine from the reverse osmosis treatment process used during groundwater restoration before the brine is treated in the radium settling ponds.

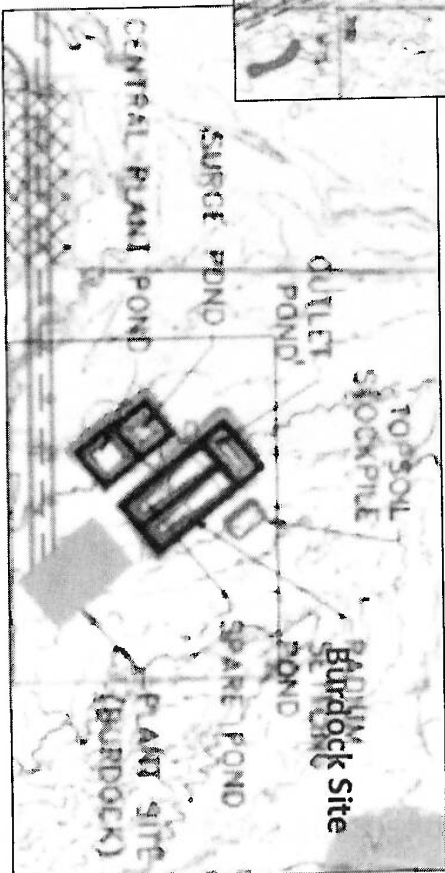
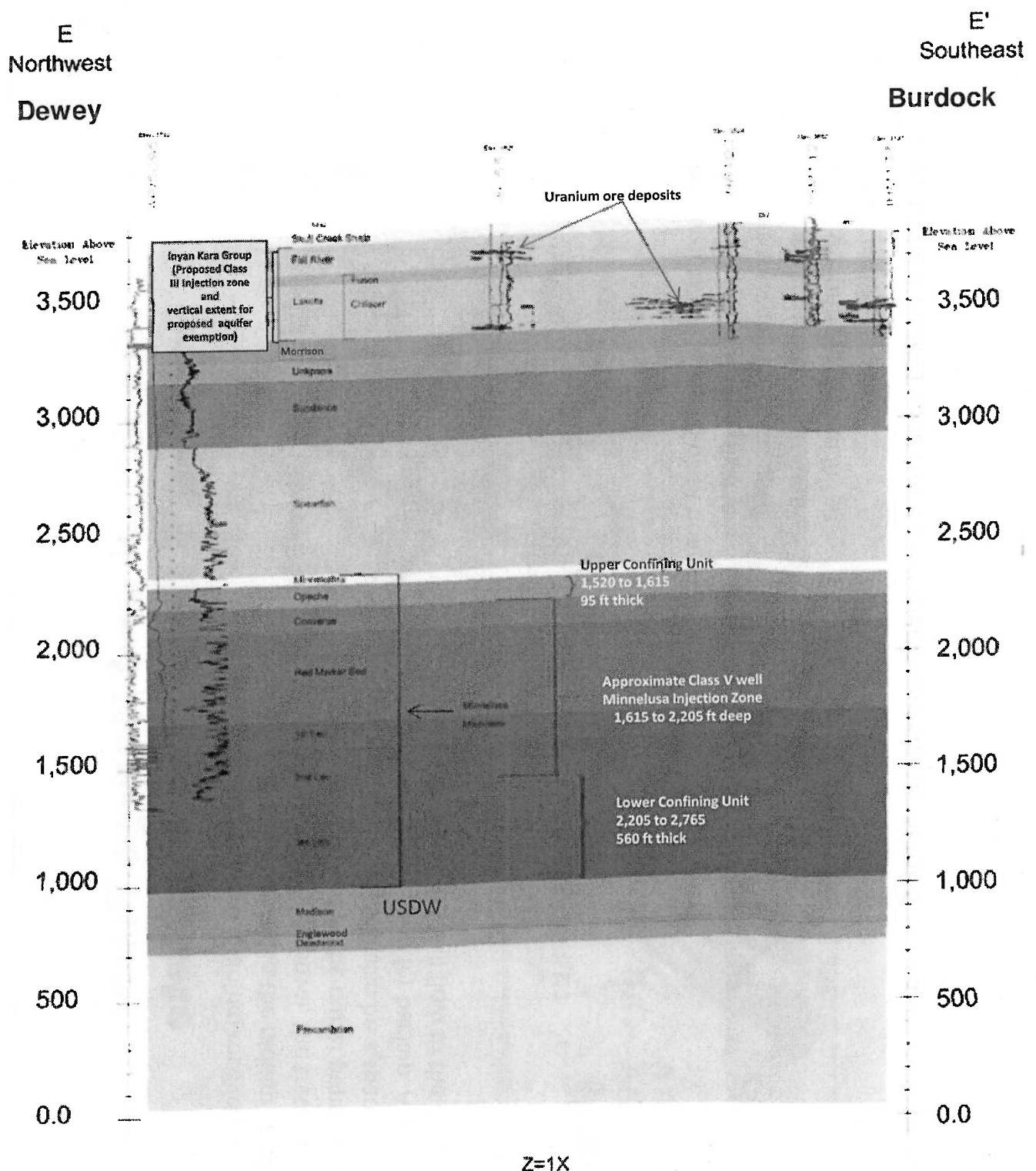


Figure 4. The proposed ponds for the treatment and storage of the Class V deep injection well injectate.



**Figure 5. Stratigraphic cross-section of geologic formations present at the Dewey-Burdock site and proposed injection zones for the Class III and Class V injections wells.**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
www.epa.gov/region8

JUN 12 2017

Ref: 8WP-SUI

Honorable Brandon Sazue, Chairman  
Crow Creek Sioux Tribe  
P.O. Box 50  
Fort Thompson, South Dakota 57339-0050

Re: U.S. Environmental Protection Agency Region 8 Underground Injection Control (UIC)  
Program Invitation for Consultation on the Dewey-Burdock Uranium Recovery Site  
Near Edgemont, South Dakota

Dear Chairman Sazue:

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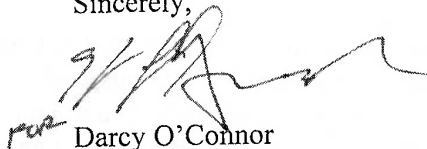
Please have your staff contact UIC Unit Manager Douglas Minter at your earliest convenience if you would like to schedule a consultation meeting with us. Also, if the Tribe would like to include National Historic Preservation Act issues within the scope of this consultation, please send Mr. Minter the name and contact information of your designated point of contact for NHPA section 106 consultation. Mr. Minter can be reached at (800) 227-8917, extension 312-6079; at (303) 312-6079; or at [minter.douglas@epa.gov](mailto:minter.douglas@epa.gov).

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Sincerely,



Darcy O'Connor  
Assistant Regional Administrator  
Office of Water Protection

Enclosures (6)

cc: Mr. Darrell Zephier, Tribal Historic Preservation Officer  
Ms. Wanda Gourneau, Environmental Director



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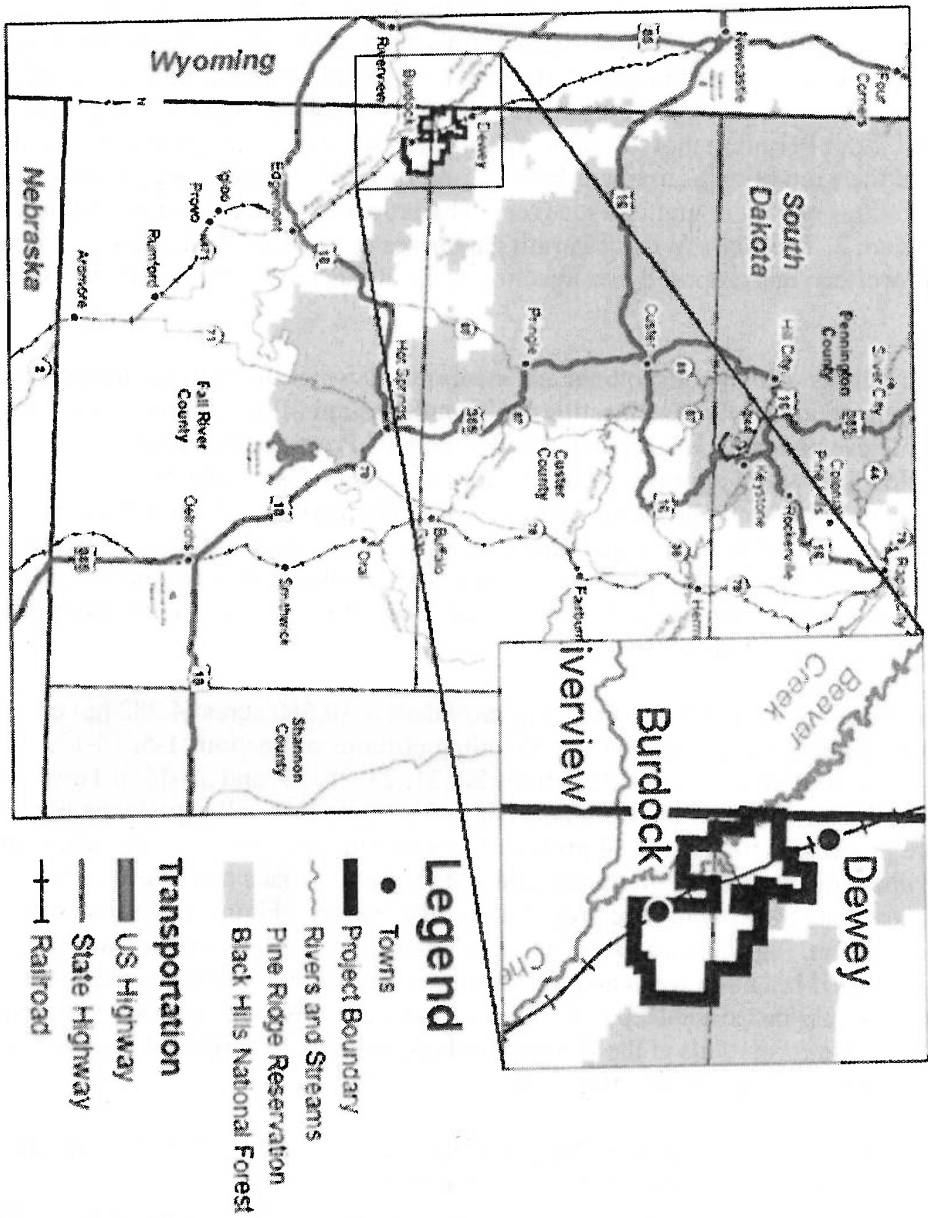
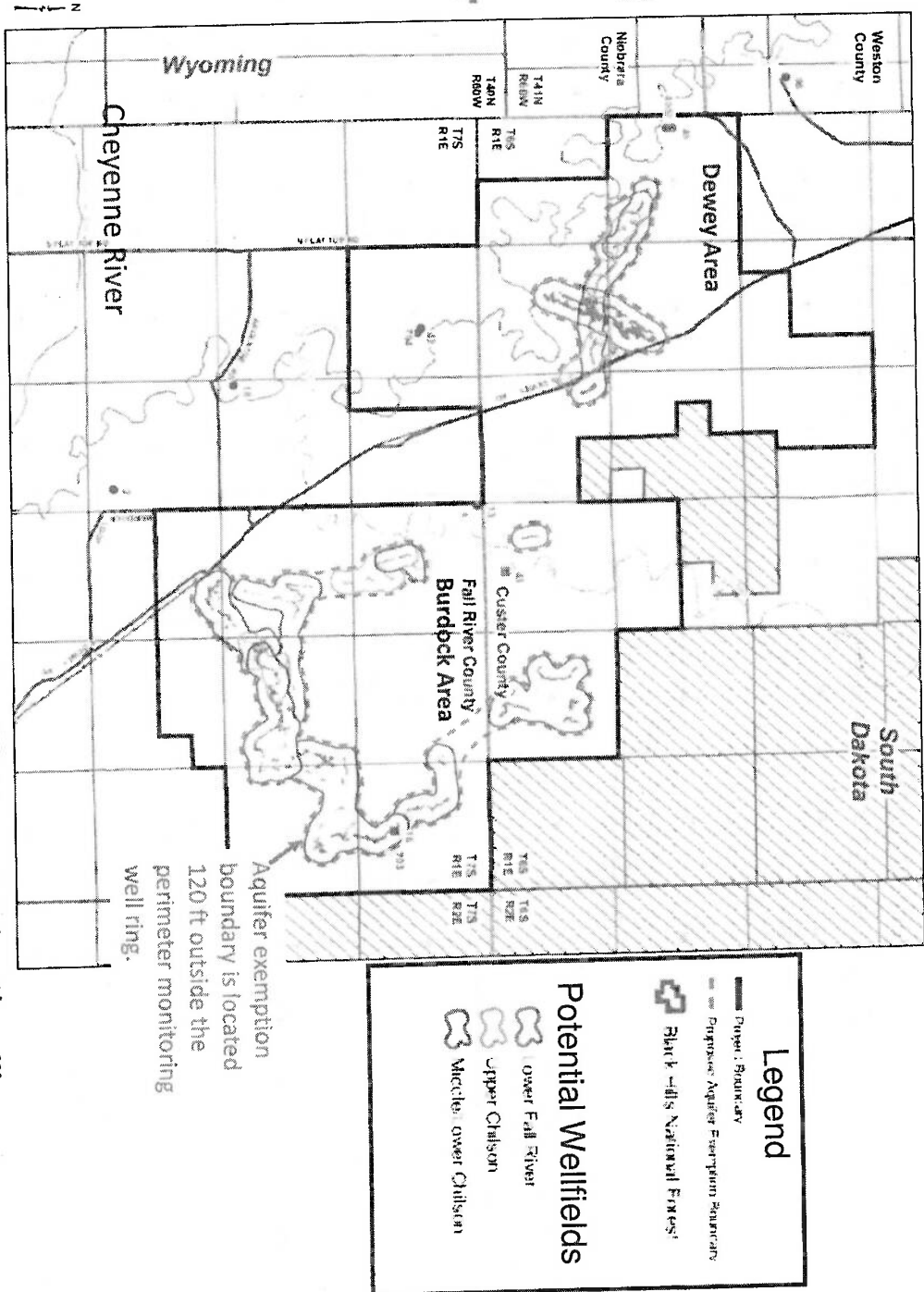


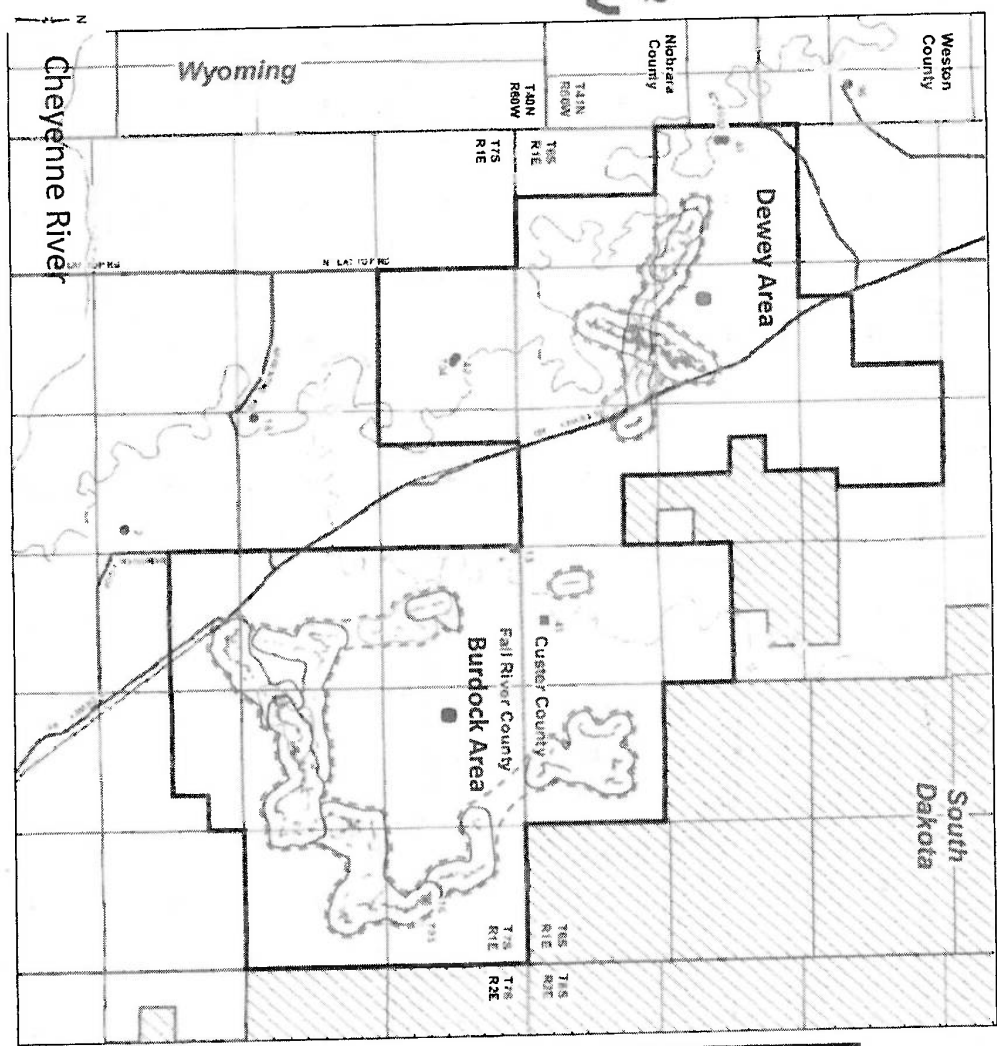
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# Dewey Burdock Proposed Class III Injection Wellfields and Exemption Boundary

Figure 2. Map showing the locations of the proposed wellfields containing Class III injection wells, the proposed aquifer exemption boundary and the project boundary.



# Dewey Burdock Proposed Class V Deep Injection Well Locations



## Legend

- Boundary
- Nebraska/Nebraska Boundary
- Black Hills National Forest

## Potential Wellfields

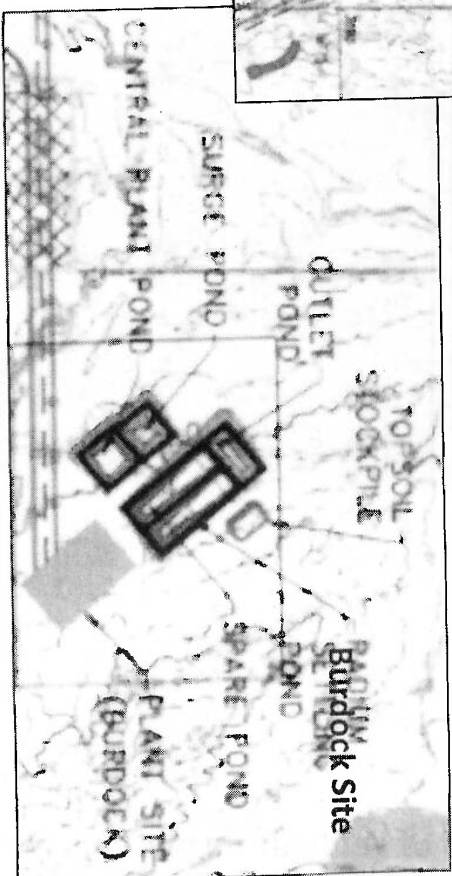
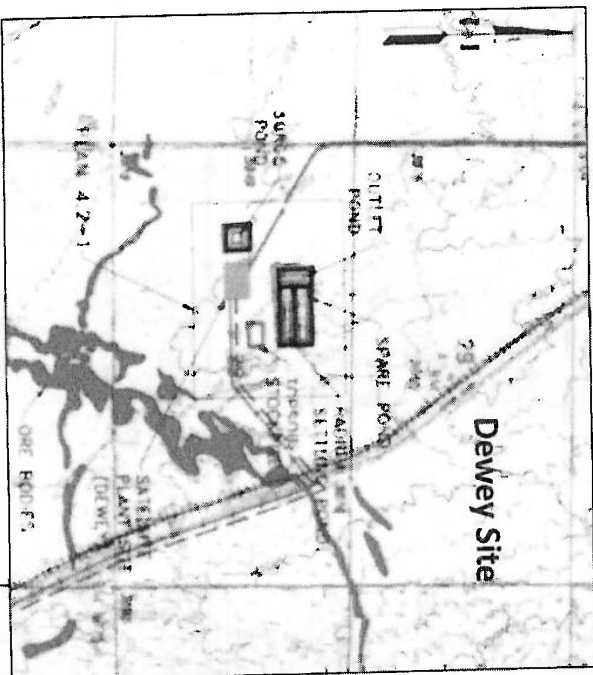
- Over Fall River
- Upper Chilson
- Middle/Over Chilson

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- Deep Injection Well #3

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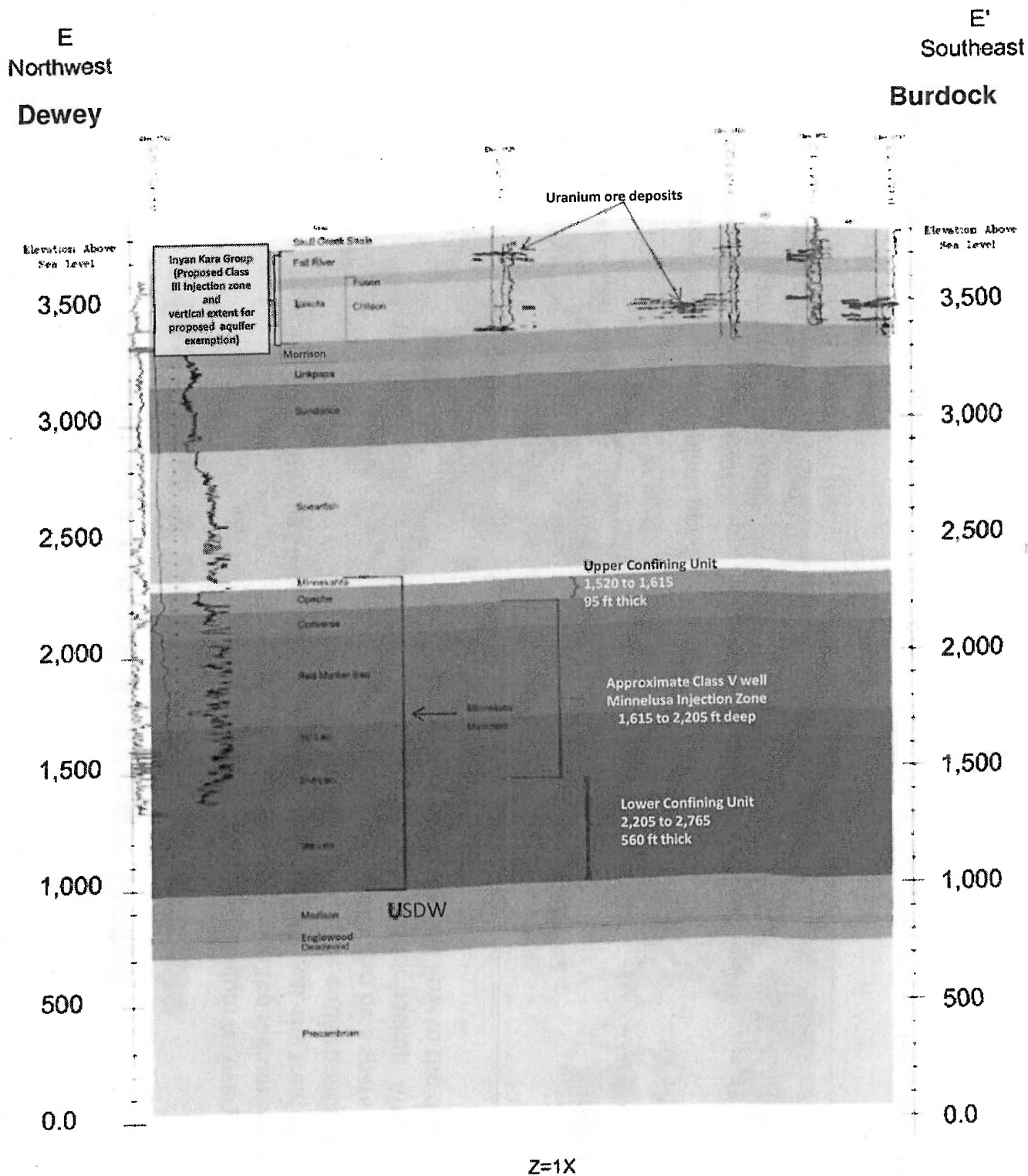


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