IN SITU URANIUM MINING AND WATER 
WHAT DO WE KNOW?

WHAT IS IN SITU LEACH MINING?

In situ leach mining (ISL) will only work when a uranium deposit is located in a groundwater aquifer. Basically, water is used as a mining tool.

Wells are drilled into a uranium ore deposit in a grid pattern. Water mixed with a chemical – typically sodium bicarbonate concentrate in the United States – and with oxygen (the “lixiviant”) is pumped down into the deposit and through the uranium ore. It leaches the uranium and other heavy metals out of the rock, so they can be pumped to the surface of the ground. At the surface, the uranium is removed from the solution for further processing.

The water is recharged with the leaching solution and re-injected into the deposit. This loop continues until most of the uranium has been removed. The wastes include radioactive byproducts, as well as the heavy metals that are found with the uranium. These often include arsenic, selenium, lead, and molybdenum.

Peninsula Minerals has proposed to use an acid leach process for its Strata-Ross project mine in Wyoming. This would be the first modern use of acid leach in situ uranium mining on a commercial scale in the United States. Acid leach processing draws out uranium more thoroughly, but leaves contamination that has proved difficult to clean up.¹

In situ mining is also called “solution” mining. While the impacts of this process have not been thoroughly studied, the research does give some important information. This booklet is a summary of some of that research.

IMPACTS OF THE IN SITU LEACH MINING PROCESS

In situ mining involves injecting a mining solution into groundwater that is substantially different from that groundwater.

This chart shows the levels of various substances in groundwater before mining
started at the Kingsville Dome mine in Texas, and it shows the level of those substances that is typical for an in situ mining solution.\textsuperscript{2}

<table>
<thead>
<tr>
<th>Substance</th>
<th>In Pre-Mining Groundwater</th>
<th>In Typical Mining Solution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Uranium</td>
<td>From (&lt;0.001) to 3.75</td>
<td>80</td>
</tr>
<tr>
<td>Molybdenum</td>
<td>From 0.01 to 3.5</td>
<td>10</td>
</tr>
<tr>
<td>Chloride</td>
<td>From 138 to 443</td>
<td>600</td>
</tr>
<tr>
<td>Bicarbonate</td>
<td>From 95 to 505</td>
<td>800</td>
</tr>
<tr>
<td>Sulfate</td>
<td>From 13 to 557</td>
<td>1200</td>
</tr>
<tr>
<td>Calcium</td>
<td>From 5.2 to 34</td>
<td>400</td>
</tr>
</tbody>
</table>

The pumping associated with in situ leach mining can change pre-mining groundwater flows.

During restoration at a small, pilot in situ mine in northern Colorado, the pumping caused a 17-foot drawdown in nearby wells.\textsuperscript{3} There have also been reports of dropping well levels in South Dakota during exploration, but they have not been conclusively linked to exploration at this time. At the Kingsville Dome mine in Kleberg County, Texas, groundwater flow was reversed. It originally flowed east. Now, according to information gathered from six wells, it flows northwest.\textsuperscript{4}

There are many examples of leaks and spills at in situ leach mining sites.

“One of the major problems associated with the in situ mining method is the uncontrolled migration of lixiviant and dissolved constituents such as radionuclides, arsenic, selenium, chromium and lead outside of the production zone. These undesirable lixiviant migrations are known as excursions.”\textsuperscript{5}

Excursions at some mines have traveled outside the areas where mining was permitted to occur. This happened at the Highland mine, according to a 2013 “Notice of Violation” from the Wyoming Department of Environmental Quality, and at the Kingsville Dome mine between 2006 and 2011, where a family’s well was contaminated.\textsuperscript{6}

Some mines have a history of many excursions, like the Crow Butte mine in Nebraska, which had 56 excursions over a 20-year period. The Lost Creek mine in Wyoming had five in four years.\textsuperscript{7} In short, excursions are a fact of life for in situ leach uranium mines.
Depending on the definition, leaks from mining areas may or may not be counted as “excursions.” The definition used by a uranium company at the Kingsville Dome mine meant that only two monitoring wells were considered “on excursion.” Using a definition based on pre-mining water quality, 15 monitoring wells would have been considered “on excursion.”

Smith Ranch and Highland (now combined) are in situ operations near Douglas, WY. In March 2008, the State of Wyoming said, “Over the years there have been an inordinate number of spills, leaks and other releases at this operation. Some 80 spills have been reported, in addition to numerous pond leaks, well casing failures and excursions. Unfortunately, it appears that such occurrences have become routine. The [Land Quality Division] currently has two three-ring binders full of spill reports from the Smith Ranch-Highland operations.”

Leaks at in situ leach operations can cause impacts on the surface of the ground.

According to the Wyoming Department of Environmental Quality, in June 2007 there was a spill of 198,500 gallons of injection fluid at the Highland mine. After this spill was discovered, an additional spill of 3,747 gallons of production fluid was found. This resulted from a failed fitting and contained uranium and other minerals. About the same time, a valve was left open, allowing a discharge of five gallons per minute. This leak may have gone on for as long as 28 days before it was discovered. The spills flowed directly into the drainage of an ephemeral stream.

Another surface spill occurred at the Crow Butte Mine near Crawford, Nebraska, from July 2003 to March 2006. The company didn’t report the spill to the state Department of Environmental Quality until mid-May 2006.

The largest surface spill to date occurred at the Lost Creek mine site in Wyoming. The concentration of uranium in the spill was 40 times higher than the safe drinking water standard.

Monitoring wells must be spaced and set up correctly if they are going to detect leaks from the mining area.

The monitoring wells at a test site in northern Colorado were set up so that, at normal flow rates, water from the in situ mining area would not reach the monitoring wells for between three and 7-1/2 years.

At the Kingsville Dome mine, monitoring wells were set up so that leaks from the mining site were diluted before they could be measured.
In situ mining uses large quantities of water. A uranium company estimates that its proposed project in northern Colorado would use up (consume) between 864,000 and 1,296,000 gallons of water per month. This is in addition to water that would be reused during the mining process.\textsuperscript{15}

A proposed in situ mine in Goliad County, Texas, would “dispose” of over 2 million gallons of water per month.\textsuperscript{16}

A proposed mine in Fall River and Custer Counties, South Dakota, in the Black Hills, has requested permits to use 9,000 gallons of water per minute for mining and restoration activities.\textsuperscript{17} This totals 129,600,000 gallons per day.

\section*{IMPACTS OF URANIUM EXPLORATION}

\textbf{Even before mining occurs, uranium exploration can cause problems.}

The Goliad County, TX, Commissioners filed a lawsuit against a uranium company over problems that have occurred during exploration. These include water becoming undrinkable because of red sediment in wells and “extremely high” levels of radon-222 and radium-226. Well levels have changed. Exploration holes have been left unplugged, and radioactivity on the surface of the ground has increased because of drilling mud and wastes left by the company.\textsuperscript{18}

The holes left by past drilling can let water move from one underground water layer to another. This is called a “vertical leak.” The presence of these holes can cause problems when in situ uranium mining pumps water into an aquifer under pressure.
Improperly plugged, completed, or abandoned wells that go through both a mining area and fresh water can provide a way for mining liquids to move into fresh water. Other links between drinking water and contaminated water can include fractures or faults in the underground rock.\textsuperscript{19}

In a study of seven in situ sites in Wyoming and one in Texas, companies had a hard time keeping contaminated mining liquids from moving vertically. These liquids often moved up and down through old, unplugged exploration holes. This was particularly a concern when contaminated water from a mining area moved upward and threatened shallow aquifers that were used for drinking and agricultural purposes.\textsuperscript{20}

A study of water contamination in the Laramie-Fox Hills aquifer in northern Colorado showed that there were leaks from the upper layer of an aquifer to lower levels of the aquifer as a result of improper well abandonment. As a result, the water in the lower levels had become contaminated.\textsuperscript{21}

In South Dakota, a study was done to determine water movement in an area that held uranium deposits. In this case, water from a uranium-bearing layer was pushing up into an aquifer above it due to artesian pressure. The authors believed that the water was moving through old unplugged uranium exploration holes. Water was also moving through a shale rock layer that separated the two aquifers because of “joints and fractures” in the shale.\textsuperscript{22}

At a mine in Texas, 45 of the 120 wells that were drilled to see if mining solution was contaminating water outside the mining area showed leakage. This leakage was related to old exploration holes and occurred “for extended periods of time.” Attempts to halt the spread of contaminants in a shallow aquifer by pumping fresh water into it, while pumping contaminated water out, “were apparently ineffective.”\textsuperscript{23}

**Old exploration holes are very hard to locate.**

“Older exploration holes in search of fossil fuels and uranium are difficult, it not impossible, to locate and many of them were improperly plugged and abandoned.” “Older holes are most likely to be unplugged. However, they are difficult to locate because of the lack of records, the scattering and covering of well cuttings by erosion and vegetation, respectively, and the collapse of exposed surface casing, if indeed permanent casings were ever installed.”\textsuperscript{24}

Casings are metal, plastic, or cement tubes used to seal a well off from the surrounding environment.

Locating abandoned wells can be difficult because this “includes wells that were drilled, completed and abandoned before adequate record keeping systems were established…. Identifying problem wells that may provide a pathway for
contaminants can be a major problem to deal with when adequate information on these wells is not available.”

**Gaps and fractures in the rock that could allow contamination to leak from underground mine sites cannot always be predicted.**

Underground structures and rock layers are complex. People tend to assume that a rock layer is consistent from one exploration hole to the next – even when it isn’t. Small changes in the physical characteristics of the rock (“slight variations in silt, clay, or carbonate cementing agents”) can produce large changes in how liquids move underground.

**Mining wastewater is often injected underground into aquifers, raising additional concerns in mining areas.**

In the Black Hills of South Dakota, a uranium company has proposed an in situ leach operation that would take place in one aquifer, draw water from a second aquifer, and pump wastewater through as many as four deep disposal wells into a third aquifer. All three are used for drinking water purposes in the area. This represents the use of three of the area’s four major aquifers.

**IN SITU LEACH MINING RECLAMATION**

**In situ mining has been known to contaminate well water that was used by humans and livestock so that it can no longer be used for drinking.**

Out of 16 wells tested before mining began at the Kingsville Dome mine in Texas, one was suitable for use as a source of drinking, livestock, or irrigation water. Restoration efforts did not return the well to its pre-mining quality. Uranium and molybdenum exceeded pre-mining levels by more than 150 times and more than 15 times, respectively. Now, the well can’t be used for drinking water for humans or livestock.

**There are numerous examples of places where water has not been returned to its original use or quality after in situ leach mining ended.**

The water quality problems that follow in situ operations have been known for years. In the late 1970s at a pilot in situ site near Grover, CO., water was tested before mining, when the mine closed, and three months later. When the mine closed, the state said the site was okay. Three months later, water at three wells showed significant increases in radioactive materials, nitrate, molybdenum, selenium, ammonia, and other contaminants. There was a 10-fold increase in “alpha” radiation, an 8-fold increase in radium-226, and a 3-fold increase in “beta” radiation.
The State of Texas’ Commission on Environmental Quality examined 32 closed in situ mine sites. The water was not returned to its original condition at any of them.30

The State of Wyoming issued a Notice of Violation for the Smith Ranch mine that included a site that had been in restoration for ten years. The notice said, “The 2007 Annual Report states that the ground water quality is similar to the ‘end of mining’ wellfield conditions.”31 In the same Notice of Violation, the State said the permit for the Highland mine states that it usually takes “three years for uranium production, and three years for aquifer restoration.” At the time of the Notice, the actual times for production and restoration had been two to three times longer than that.32

In a federal lawsuit in Texas, the court ruled that certain water wells had been used for drinking before ISL mining started. In their affidavits, ranchers who were suing a mining company said that the company had left uranium and selenium in the water, impacting ranching and hunting uses. The ranchers said that the mining company promised that the water would be returned to its pre-mining condition.33

In one mining area at the Kingsville Dome mine, the company’s water restoration failed to meet state requirements for seven items (uranium, chloride, calcium, bicarbonate, sulfate, molybdenum, and electrical conductivity). In the second area where restoration was attempted, the results failed to meet state standards for eight items (uranium, chloride, pH, electrical conductivity, calcium, bicarbonate, sulfate, and molybdenum). Water can continue to move underground after a mine closes, threatening nearby wells.34

The water at a wellfield that went through the restoration process at the Highland mine still had significantly increased amounts of arsenic, iron, manganese, selenium, and uranium eight years after mining ended. The levels of these substances at various stages of the process and the state of Colorado’s water standards were:35

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<tbody>
<tr>
<td>Arsenic</td>
<td>0.001</td>
<td>0.001</td>
<td>0.1</td>
<td>0.3</td>
<td>0.01</td>
</tr>
<tr>
<td>Iron</td>
<td>0.05</td>
<td>0.05</td>
<td>1.32</td>
<td>1.3</td>
<td>0.3</td>
</tr>
<tr>
<td>Manganese</td>
<td>0.03</td>
<td>0.66</td>
<td>0.41</td>
<td>0.49</td>
<td>0.05</td>
</tr>
<tr>
<td>Selenium</td>
<td>0.001</td>
<td>0.990</td>
<td>0.160</td>
<td>0.070</td>
<td>0.05</td>
</tr>
<tr>
<td>Uranium</td>
<td>0.05</td>
<td>40.19</td>
<td>3.0</td>
<td>3.53</td>
<td>0.030</td>
</tr>
</tbody>
</table>
The water at a wellfield that went through five years of restoration at the Crow Butte mine in Nebraska still had increased alkalinity, arsenic, magnesium, radium-226, uranium, and vanadium. The uranium level was more than 10 times as high as when mining started. Restoration continued for another 4 years before the site was considered stabilized.\textsuperscript{36}

Bill Von Till of the Uranium Recovery Branch of the U.S. Nuclear Regulatory Commission, which regulates in situ uranium mining, said, “What the groundwater community has found over the years is that trying to achieve cleanup to background is virtually impossible.”\textsuperscript{37}

At a hearing of the Colorado House of Representatives’ Committee on Agriculture, Livestock and Natural Resources on January 30, 2008, the attorney for a uranium company agreed that full water restoration is “almost impossible.”\textsuperscript{38}

\textbf{When a uranium company cannot clean up water at an in situ mine to the level promised in their permit, regulating agencies often “relax” the water restoration standard.}

At 32 closed in situ leach mines in Texas, the State let companies leave behind higher levels of minerals than allowed by the companies’ original permits, including uranium, molybdenum, and selenium.\textsuperscript{39}

\textbf{As at other types of uranium facilities, the bonds that are designed to insure clean-up at in situ leach mine sites can be inadequate due to the high costs of clean-up.}

In March 2008, the State of Wyoming said this about the Smith Ranch and Highland in situ mines, run by Power Resources, Inc. (PRI): “Considering that reclamation will take several times longer, require at least twice the staff with higher wages and require much greater investments in infrastructure than PRI has estimated, a realistic reclamation cost estimate for this site would likely be on the order of $150 million, as compared to PRI’s current calculation of $38,772,800. PRI is presently bonded for a total of only $38,416,500…. Clearly the public is not protected.”\textsuperscript{40}
Notes:

4 George Rice. See above.
7 Information on these license violations and reportable events is compiled from Nuclear Regulatory Commission records by wise-uranium.org and was reviewed in April 2018.
8 George Rice. See above.
13 Kenneth S. Wade. See above.
14 George Rice. See above.
17 Applications from Powertech Uranium to the Environmental Protection Agency and the South Dakota Department of Environment and Natural Resources.
18 Greg Harman. See above.
20 W.P. Staub, N.E. Hinkle, R.E. Williams, F. Anastasi, J. Osiensky, and D. Rogness. See above.
23 W.P. Staub, N.E. Hinkle, R.E. Williams, F. Anastasi, J. Osiensky, and D. Rogness. See above.
24 W.P. Staub, N.E. Hinkle, R.E. Williams, F. Anastasi, J. Osiensky, and D. Rogness. See above.
25 U.S. Environmental Protection Agency. See above.
26 W.P. Staub, N.E. Hinkle, R.E. Williams, F. Anastasi, J. Osiensky, and D. Rogness. See above.
28 George Rice. See above.
29 “Alpha” and “beta” are names for two kinds of radiation. “Gamma” is a third. Alpha and beta radiation have to be inhaled or ingested to harm people. Gamma radiation goes through skin. James Warner. Finite Element 2-D Transport Model of Groundwater Restoration for In Situ Solution Mining of Uranium. Civil Engineering Department, Colorado State University. 1981. Kenneth S. Wade. See above.
33 Dan Kelley. See above.
34 George Rice. See above.
36 J.A. Davis and G.P. Curtis. See above.
37 Dan Kelley. See above.
39 Dan Kelley. See above.
Clean Water Alliance

We are a diverse collection of citizens concerned about the health, environmental and economic impacts that proposed radioactive mining projects would have on our communities, people, and natural resources.

After much research and investigation, we are convinced uranium mining would have dire consequences. Our goal is to prevent uranium mining in the Black Hills region and to protect our valuable resources — especially our water — for future generations.

Uranium mining has been stopped before in the Black Hills.

We need to stop it now.

Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has.

Margaret Mead

How can I learn more about uranium mining in the Black Hills?

Go to our website: www.bhcleanwateralliance.org
Facebook: Black Hills Clean Water Alliance
Email us: nobhuranium@gmail.com

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Stop Uranium Mining in the Black Hills

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