

STATE OF SOUTH DAKOTA
DEPARTMENT OF AGRICULTURE & NATURAL RESOURCES
BOARD OF MINERALS AND ENVIRONMENT

IN THE MATTER OF CLEAN)	
NUCLEAR ENERGY CORP.)	INTERVENOR LILIAS JONES JARDING
URANIUM EXPLORATON PERMIT)	SUBMISSION OF ADDITIONAL
APPLICATION)	EXHIBITS
)	
)	
EXNI 453)	

COMES NOW Intervenor Liliias Jones Jarding and respectfully moves to file additional exhibits identified as of this date as evidence in this matter. Copies of this motion and the herein-referenced exhibits are being made available to all parties by postal mail and by electronic means.

Since the original filing date for exhibits in 2025, additional documents have become available and/or have become more relevant to the current matter, as it has been defined by the decisions of the Board of Mineral and Environment at their meeting of March 18, 2026.

The attached exhibits are:

1. Rowland L. Hall. 1982. Radiological and Environmental Assessment of Abandoned Uranium Mines in the Edgemont Mining District, South Dakota. A thesis submitted in partial fulfillment of the requirements for the degree of Master of Science Geology. South Dakota School of Mines and Technology.
2. Mato Ohitika Analytics. October 1, 2025. Current Bureau of Land Management Mineral and Land Records System Active Mining Claims.

This Motion is not filed for any improper purpose or to cause delay. It is filed to ensure that issues in this matter receive proper and complete illumination and to ensure that the Board's

decisions are fully informed by relevant information and are in the best interests of the State and the people of South Dakota.

Respectfully Submitted,

Lilias Jones Jarding, Ph.D.

Intervenor

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March 23, 2026

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original of the Intervenor's Submission of Additional Exhibits was served electronically, and by via United States Mail, First Class, Postage Prepaid upon the following to be filed in the above captioned matter:

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Further, the undersigned certifies that true and correct copies of the above referenced documents were served via United States Mail, First Class, Postage Prepaid upon the following:

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Dated this 23rd day of March, 2026

Signature: 

EXHIBIT

Jarding 23

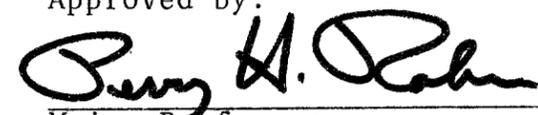
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OF ABANDONED URANIUM MINES
IN THE EDGEMONT MINING DISTRICT
SOUTH DAKOTA

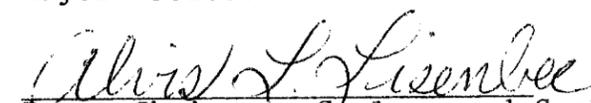
by
ROWLAND L. HALL

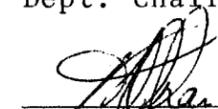
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A thesis submitted in partial fulfillment
of the requirements for the degree of
MASTER OF SCIENCE
GEOLOGY
SOUTH DAKOTA SCHOOL OF MINES AND TECHNOLOGY
1982

Approved by:


Major Professor


Dept. Chairman, Geology and Geologic Engineering


Dean of Graduate Studies

Thesis

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1982

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Among those who read the preliminary draft and made valuable suggestions are Dr. Perry Rahn (South Dakota School of Mines and Technology), Mr. Terry Yamamoto, and Dr. Ardel Bjugstad (Rocky Mountain Forest and Range Experiment Station). Each made valuable suggestions which significantly improved the work but none should be held responsible for shortcomings.

Additionally, Mr. Kenneth Fantone assisted with the initial field work, Mr. Douglas Beagle helped with the literature search, and Mr. Rick Kiel helped analyze spoils for radium-226.

Finally, I am grateful to my wife, Nancy, for her patience and time spent in typing this thesis.

ABSTRACT

This thesis is a site-specific evaluation of abandoned uranium mines in the southern Black Hills of South Dakota. The study, sponsored by the Rocky Mountain Forest and Range Experiment Station and the Black Hills National Forest, is an attempt to determine the present conditions within the abandoned mines of the Edgemont mining district.

The locations of 38 uranium mines covering greater than 490 acres (198 ha) were plotted on orthophotoquad maps and on 7½ minute quadrangle maps. The volume of spoils within the study area is estimated to be greater than 390,000 cubic yards (298,165 m³).

Fifteen spoils samples from abandoned mine sites were analyzed for radium-226. Results from the analysis indicate isolated "hot spots" do exist, therefore, a potential hazard also exists from external radiation from uranium spoils, especially over long term exposure. Possible hazards to the occasional visitor would be minimal.

Air samples from selected adits analyzed for radon-222 indicate levels above the occupational exposure rates. Therefore, a potential hazardous condition does exist within the adits of the study area.

Many physical hazards and adverse environmental impacts were found in the study area. These include: open ventilation shafts; unplugged drill holes; stream erosion; and structurally unstable adits.

Based on the findings of this investigation, the following recommendations are made: (1) close all adits to eliminate possibilities of excessive radon gas exposure; (2) security fencing to be placed around mined areas and posted to warn against radiation and physical hazards; (3) reseed disturbed areas with native plant growth; (4) monitor the returning vegetation to measure its progress and (5) consult a health physicist to determine exposure rates for the occasional visitor.

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INTRODUCTION

Radioactive element mining and milling is becoming an issue in the Black Hills region. Strong feelings, both pro and con, concerning nuclear chemistry and its place in society make it an emotional as well as an economic issue.

A great deal of information is required before the U.S. Forest Service can properly redeem management responsibilities on public lands. What exactly will be the effects to the Black Hills region if large production radioactive ore mining and milling is initiated? What will happen to the ground water, to wildlife and the food chain, to the general population? What conditions exist in prospective mining areas now? (Mathers, 1979).

To answer these questions, a cooperative project between the Rocky Mountain Forest and Range Experiment Station, Rapid City, South Dakota and the Black Hills National Forest, Custer, South Dakota was started in June of 1979. This study is a part of this cooperative effort.

The purpose of this study is two-fold: (1) to determine the location, volume, and radiological status of all known uranium spoils and sites of mining disturbance in the southern Black Hills, and (2) to assess the present and future environmental impacts associated with these spoils.

The identification of these impacts is of great concern to the U.S. Forest Service (USFS) as well as to the general public. Much of the uranium mining in the Black Hills occurred on USFS land. It is not known if these abandoned spoils and

mining operations are hazardous to wildlife, domestic animals or the general public.

Uranium was discovered in 1951 in the southern Black Hills by Jerry G. Brennan of Rapid City, South Dakota (Page and Redden, 1952). This discovery brought many prospectors and mining companies into the area. Within the next thirteen years, nearly one million tons (6.8×10^5 kg) of U_3O_8 were mined (Jackson, 1975). No mines are operating although Union Carbide Corporation and Tennessee Valley Authority (TVA) may resume mining in the near future.

Essentially no reclamation was done in the old mined areas (Figures 1, 2, 3, & 4). Numerous open pits, underground mines and associated dumps occur in the outcrop area of the Inyan Kara Group within 25 kilometers of Edgemont, South Dakota. Because no reclamation has been done on the mine sites, mine spoils are exposed to the biosphere. The mine spoils are potentially hazardous because they contain radioactive and toxic trace elements which may create health hazards to wildlife, domestic animals, or man.

There is no document which shows the location, size, and radioactivity of the abandoned uranium mines, spoils, and adits of the Edgemont mining district. The hazards to man, livestock, and wildlife cannot be evaluated until these data are acquired and evaluated. For this reason, a site-specific investigation is needed before the present conditions and environmental impact may accurately be assessed.

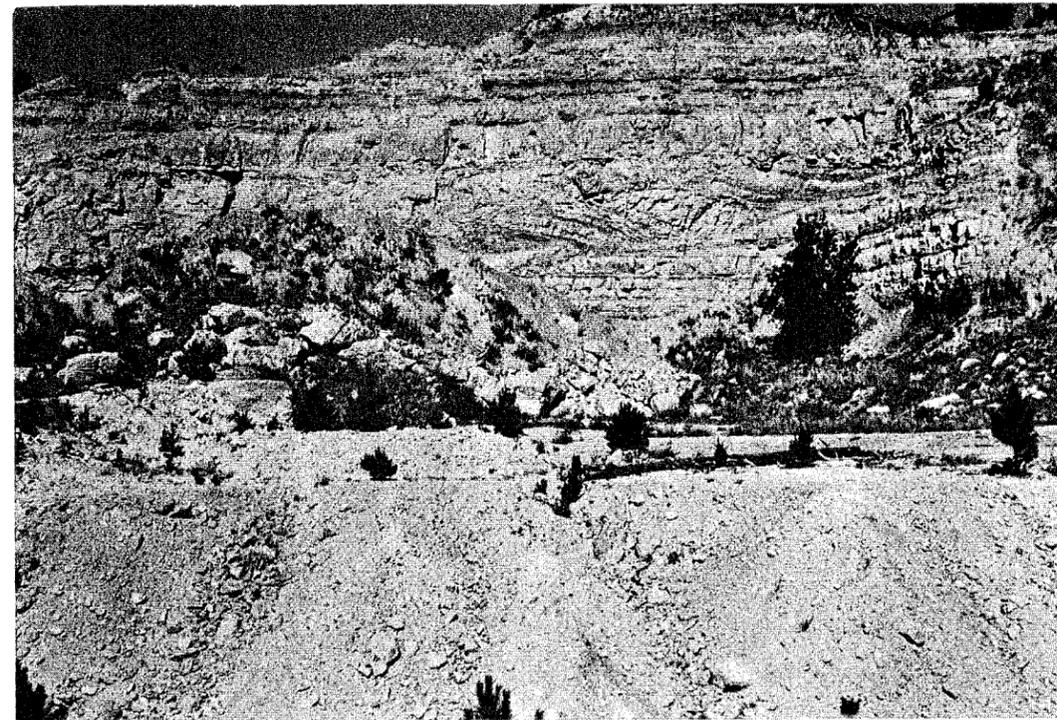


Figure 1 - Hay and Fay Mine, Showing Unreclaimed Condition of Open Pit Mines.

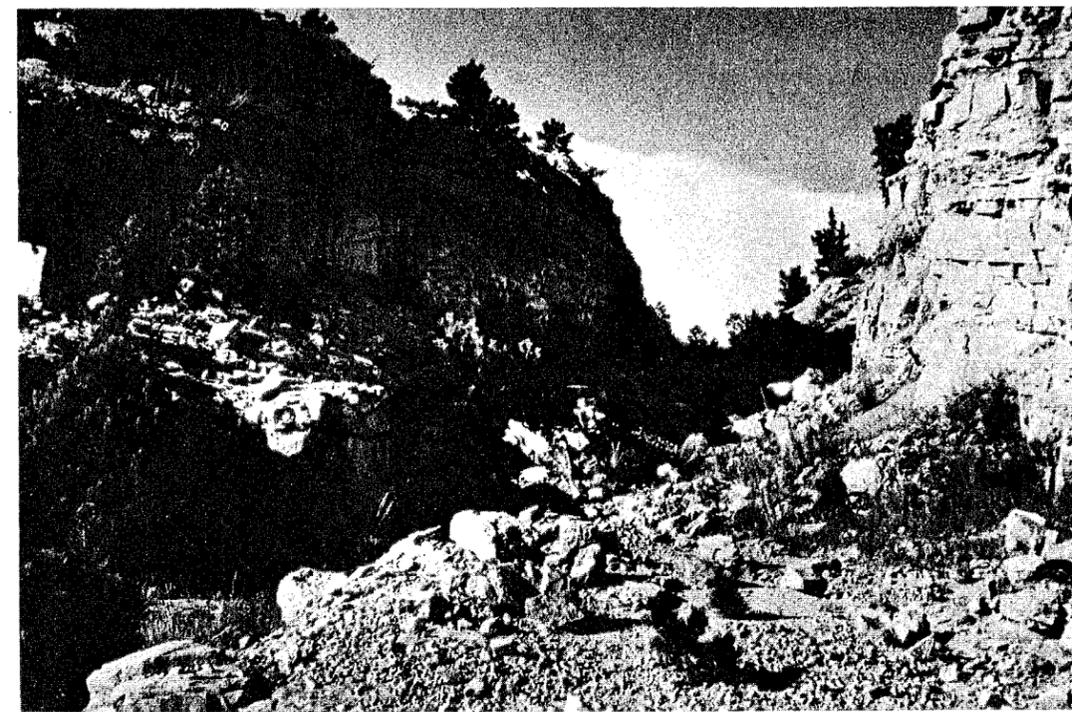


Figure 2 - Clarabelle Mine, Showing Unreclaimed Condition Typical of Most Uranium Mines Within the Study Area.

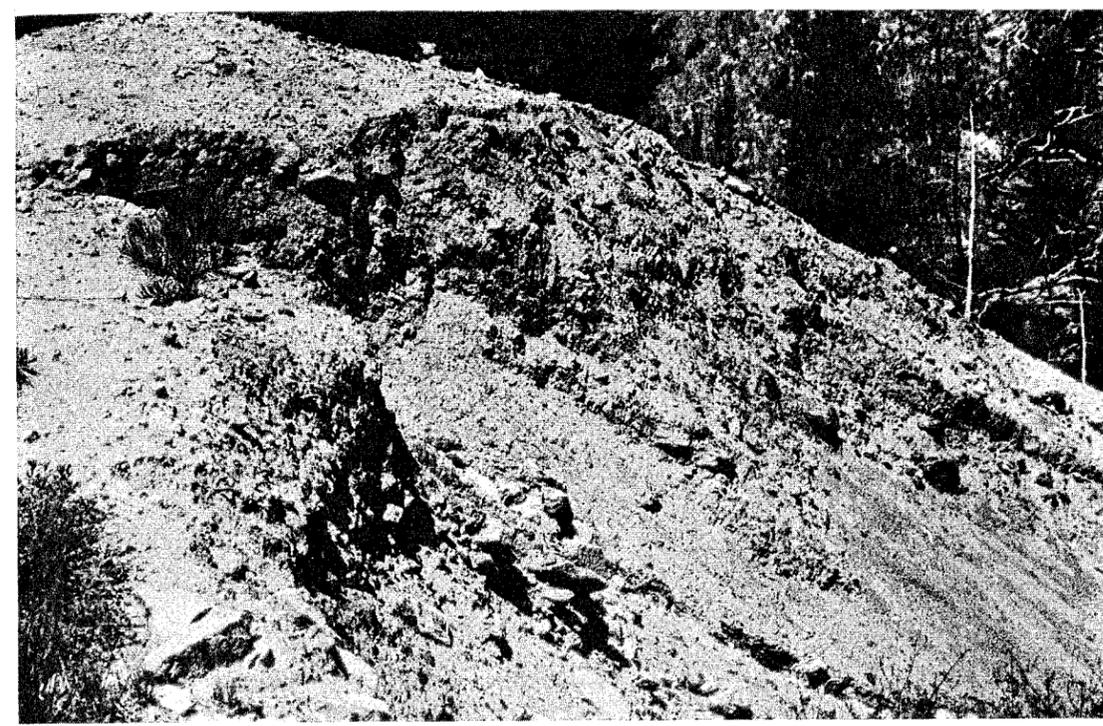


Figure 3 - Mine Spoils (Dumps and Possible Unused Ore Piles) from the Hot Point Group.



Figure 4 - Mine Spoils from the Ridge Runner Mine Showing Erosional Features and Lack of Vegetation.

The area encompassed by this study lies in Fall River and Custer counties in South Dakota and is almost entirely USFS property. Geographically, the study area lies south of the Dewey-Minnekahta road, north of Edgemont and the Burlington Northern Railroad, and west of Highway 18 (Figure 5).

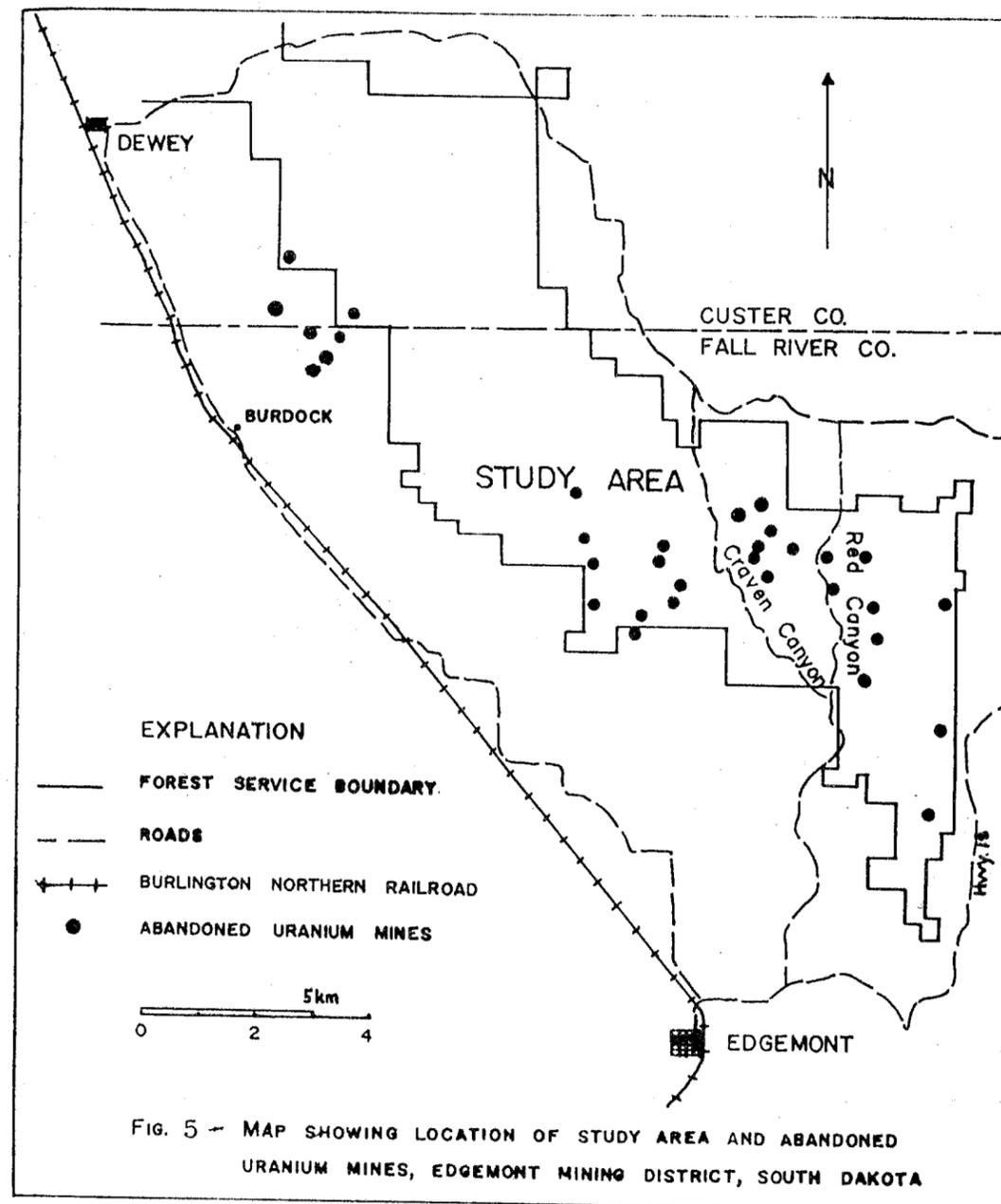


FIG. 5 - MAP SHOWING LOCATION OF STUDY AREA AND ABANDONED URANIUM MINES, EDGEMONT MINING DISTRICT, SOUTH DAKOTA

Chapter 1

METHODS

The first step in the accomplishment of the objectives of this study was to locate and map the individual sites of disturbance within the study area. All known mines in the Edgemont district were plotted from aerial photographs at a scale of 1: 12,000. The photographs were from four separate flight lines flown over the study area by Horizons Inc., Rapid City, South Dakota in 1978. The only area not covered by these flight lines was along Driftwood Canyon. Field reconnaissance has shown this area to be void of major mining. The resulting maps are presented in Figures 6 through 9. Distinctions were made on the basis of pits, spoils and areas with man-made disturbances. Finally, access roads were plotted. These roads, as evaluated from the photographs, were of unknown condition. A closer study by the author's field investigations has shown that these roads are mostly in poor condition.

The information from these maps was transferred to topographic maps and orthophotoquads at a scale of 1:24,000 (Figures 10 through 17). A listing of mines with township-section-range descriptions is located in Table 1. The volume of spoils and the area of disturbance, as estimated from aerial photographs and field measurements for each mine survey, are listed in Table 2.

A field reconnaissance of selected mine sites within the study area was then conducted by the author to evaluate the existing conditions and impacts associated with the abandoned

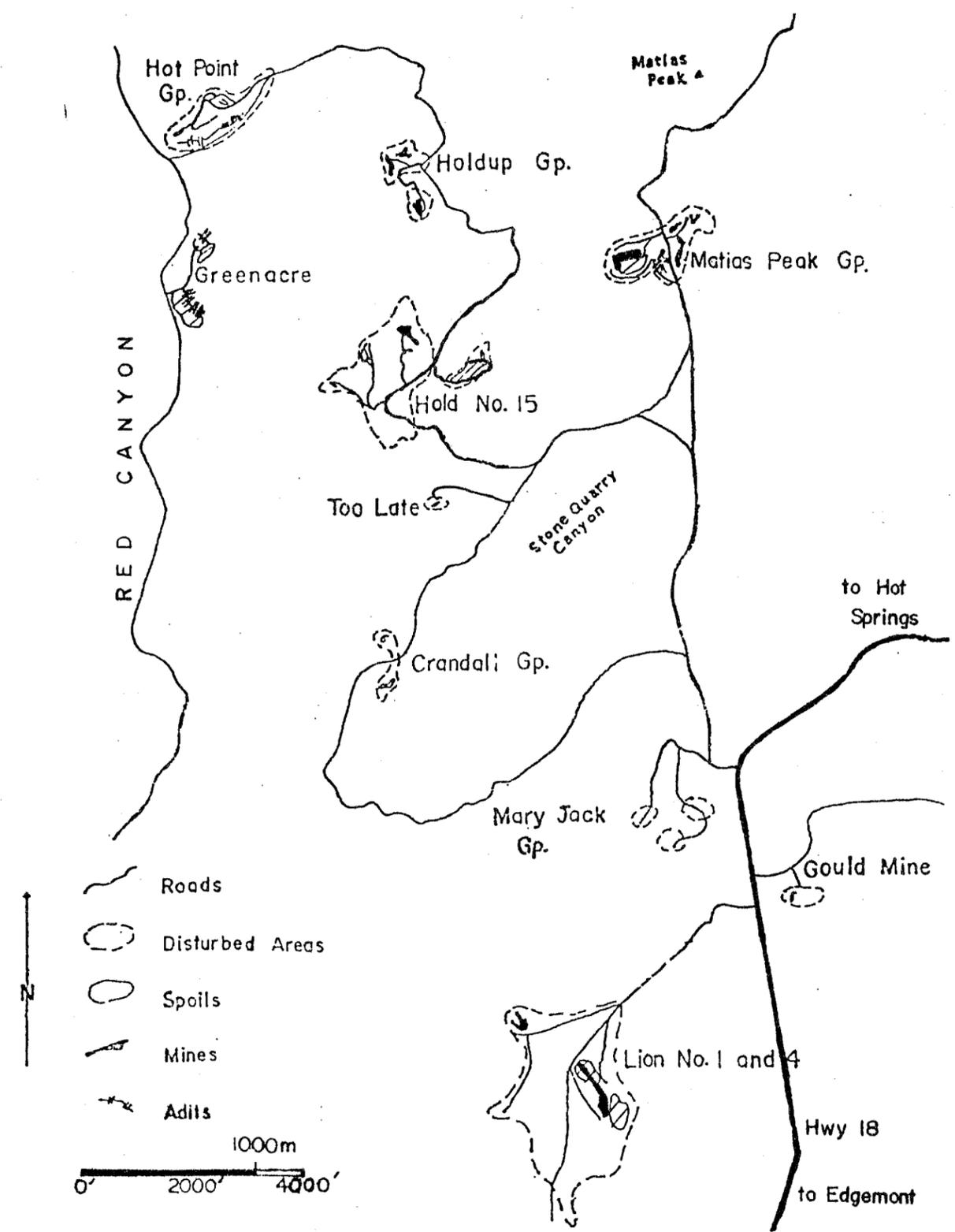


Figure 6 - Location of Abandoned Mines in Study Area.

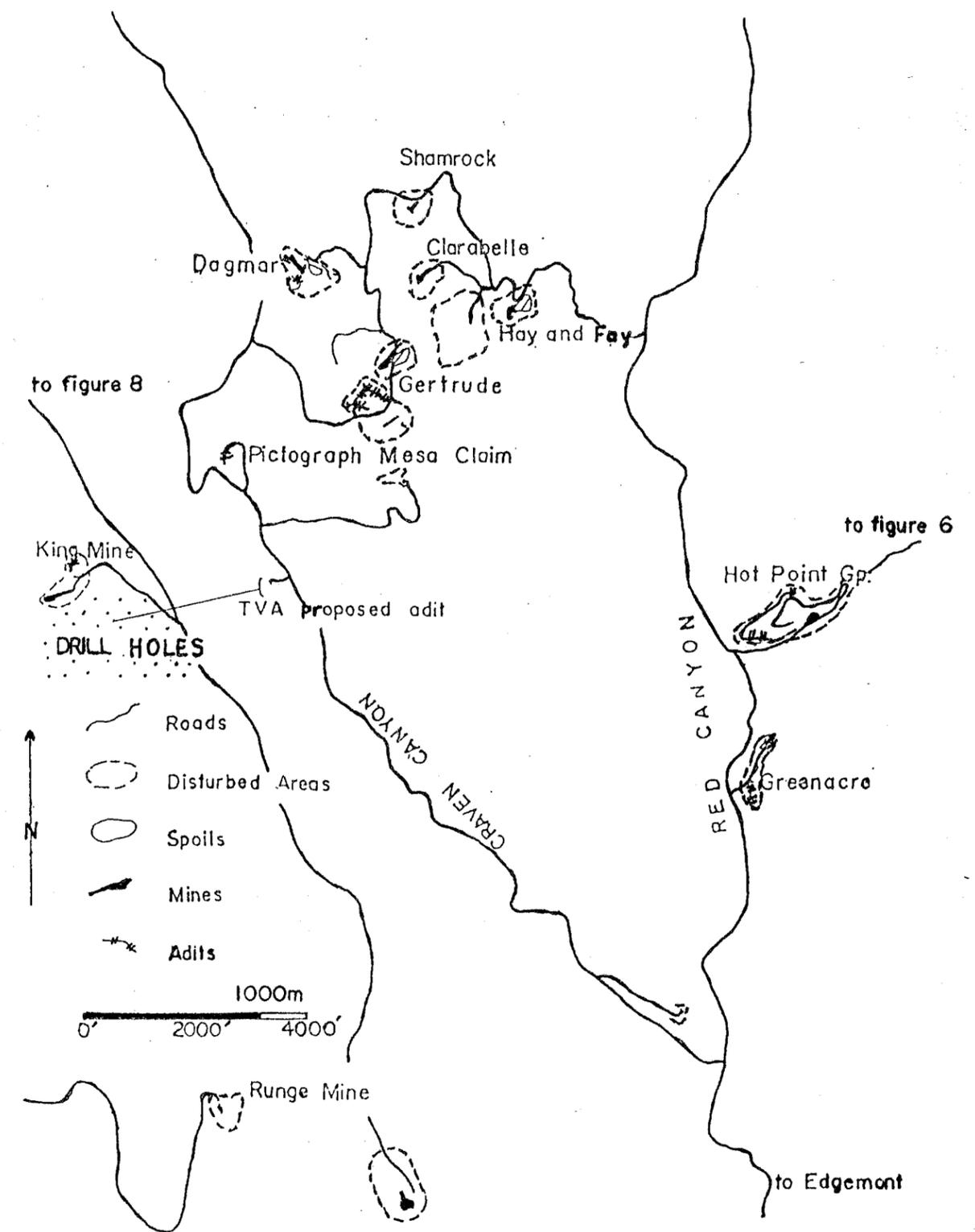


Figure 7 - Location of Abandoned Mines in Study Area.

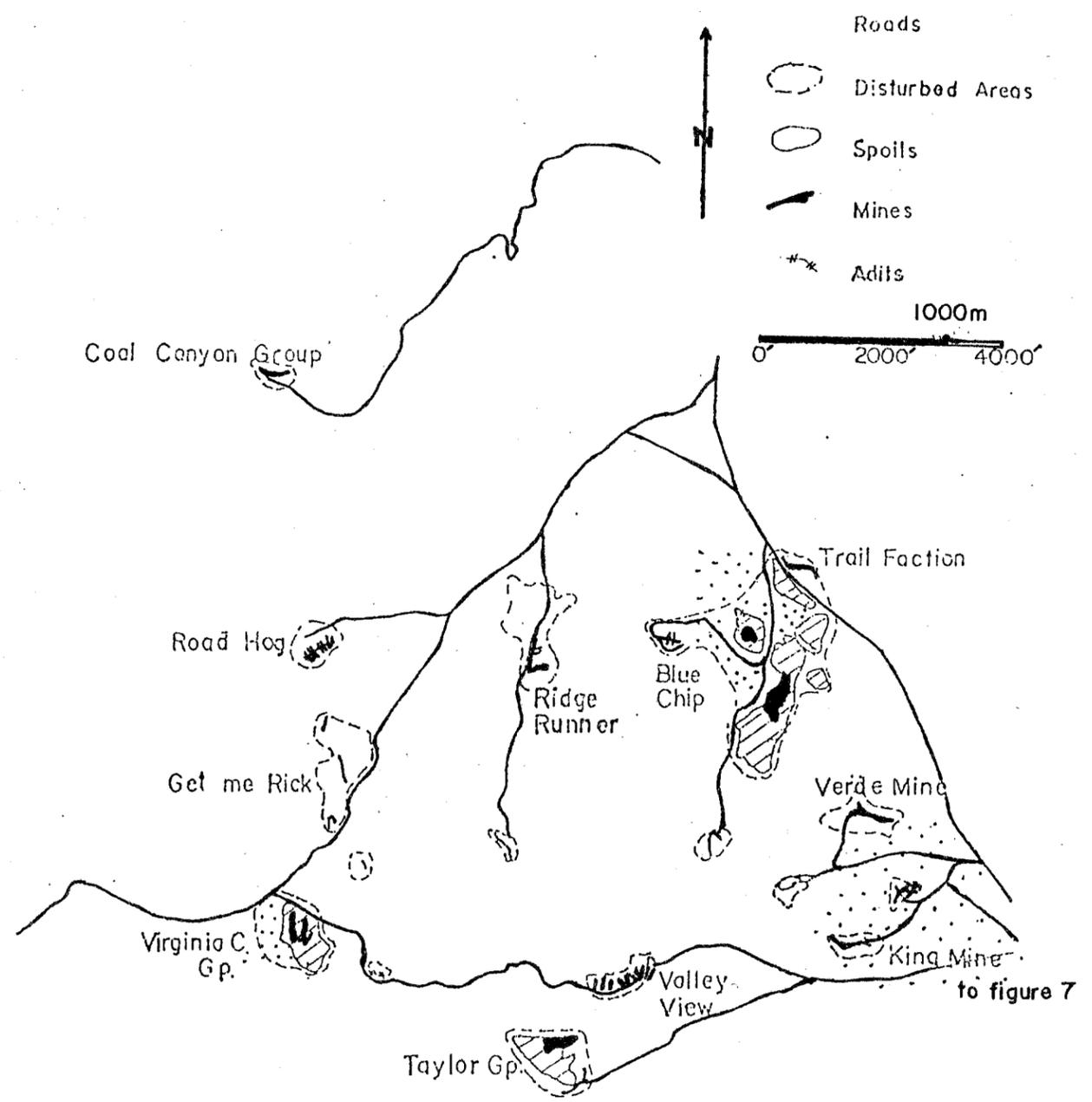


Figure 8 - Location of Abandoned Mines in Study Area.

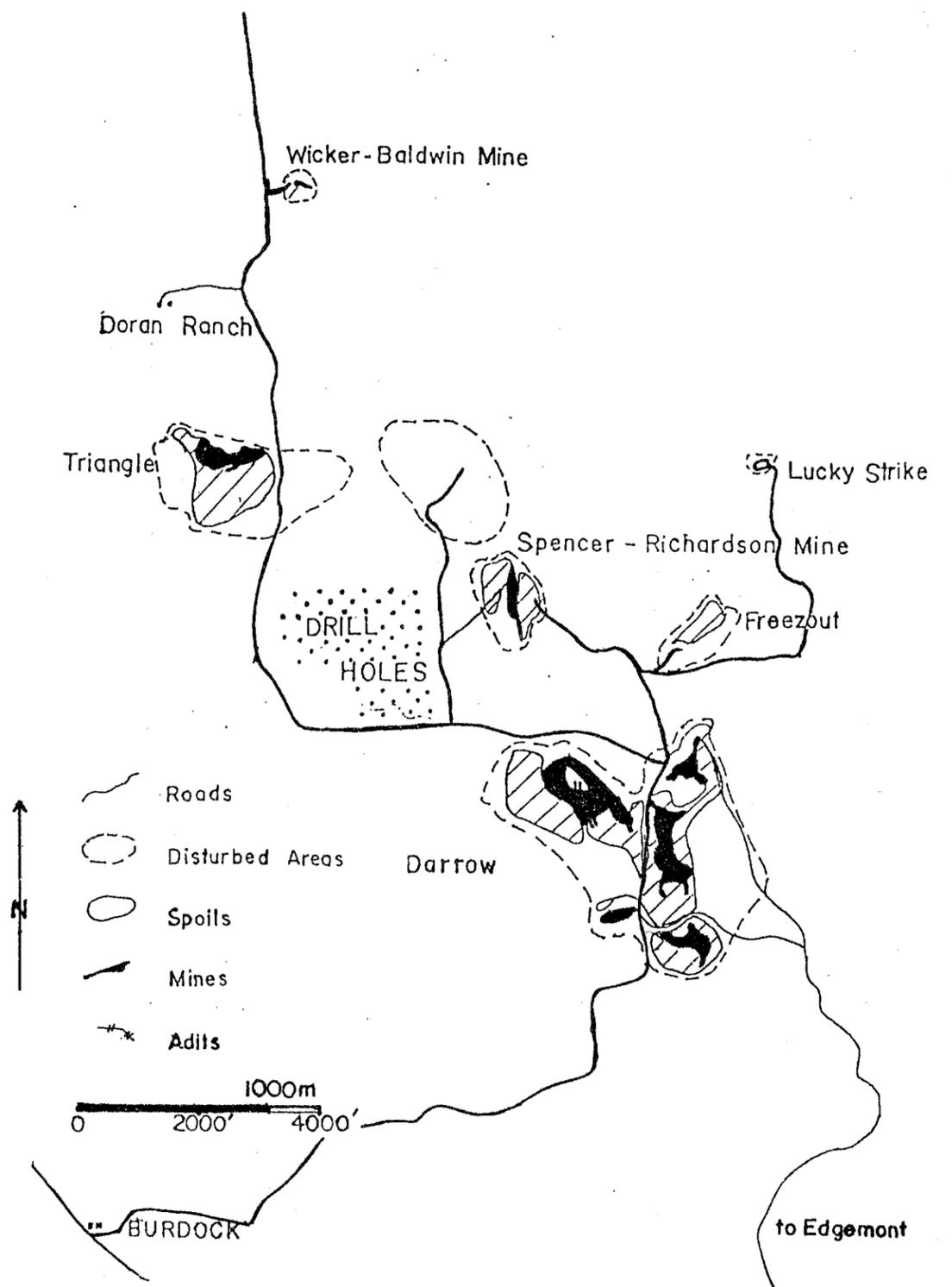


Figure 9 - Location of Abandoned Mines in Study Area.

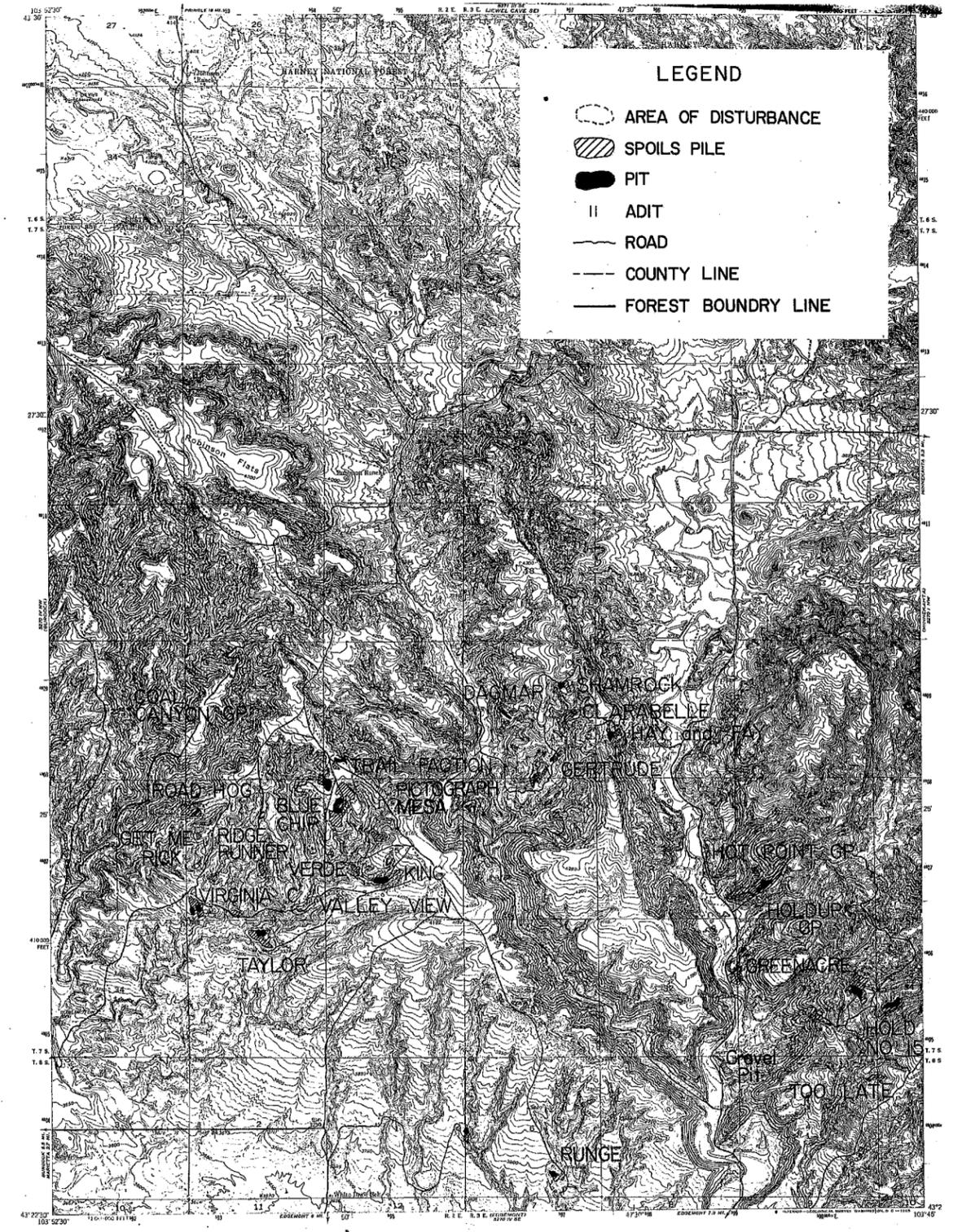


Figure 10 - Location of Mines Within Edgemont Northeast Topographic Quadrangle.

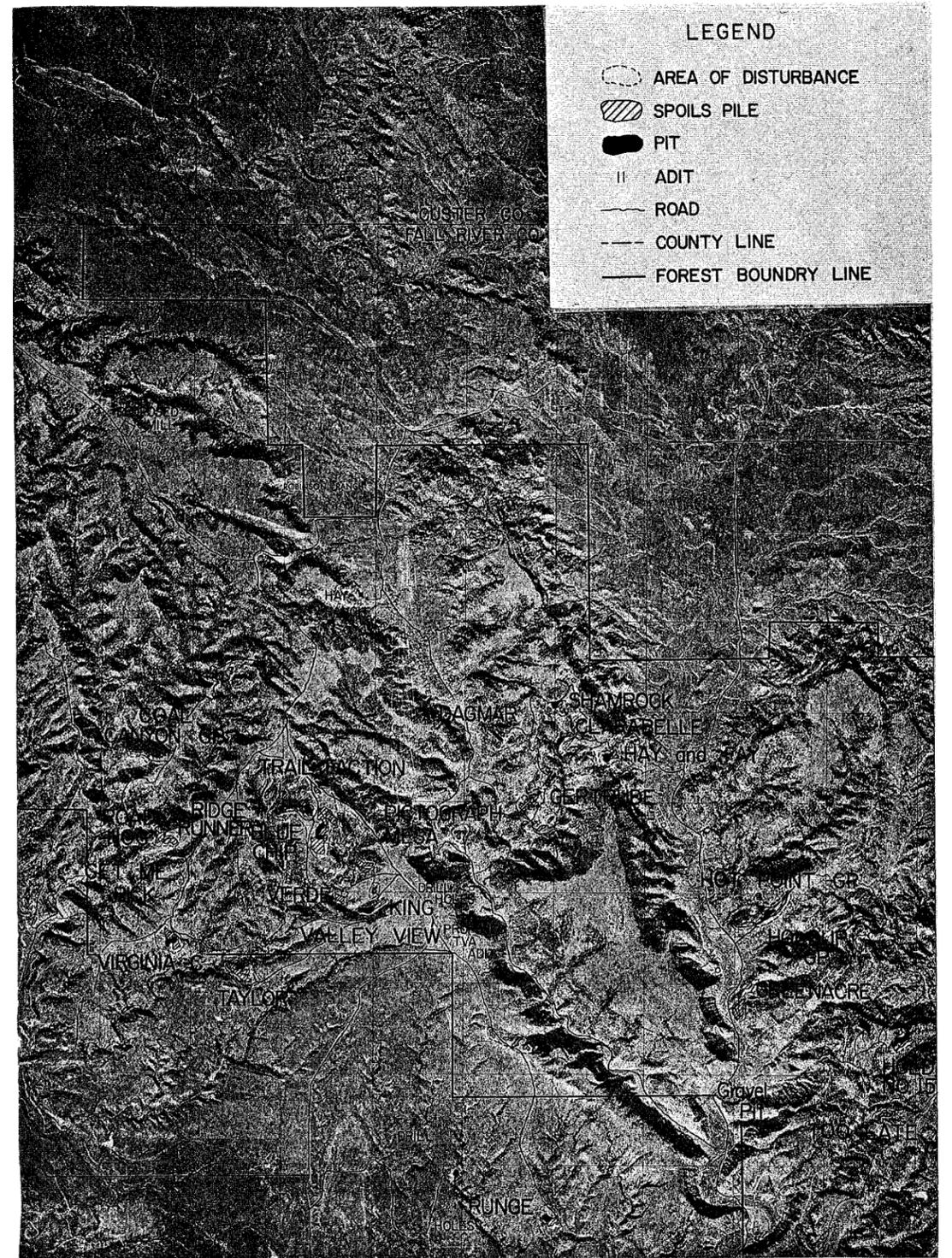


Figure 11 - Location of Mines Within Edgemont Northeast Ortho-photoquad.

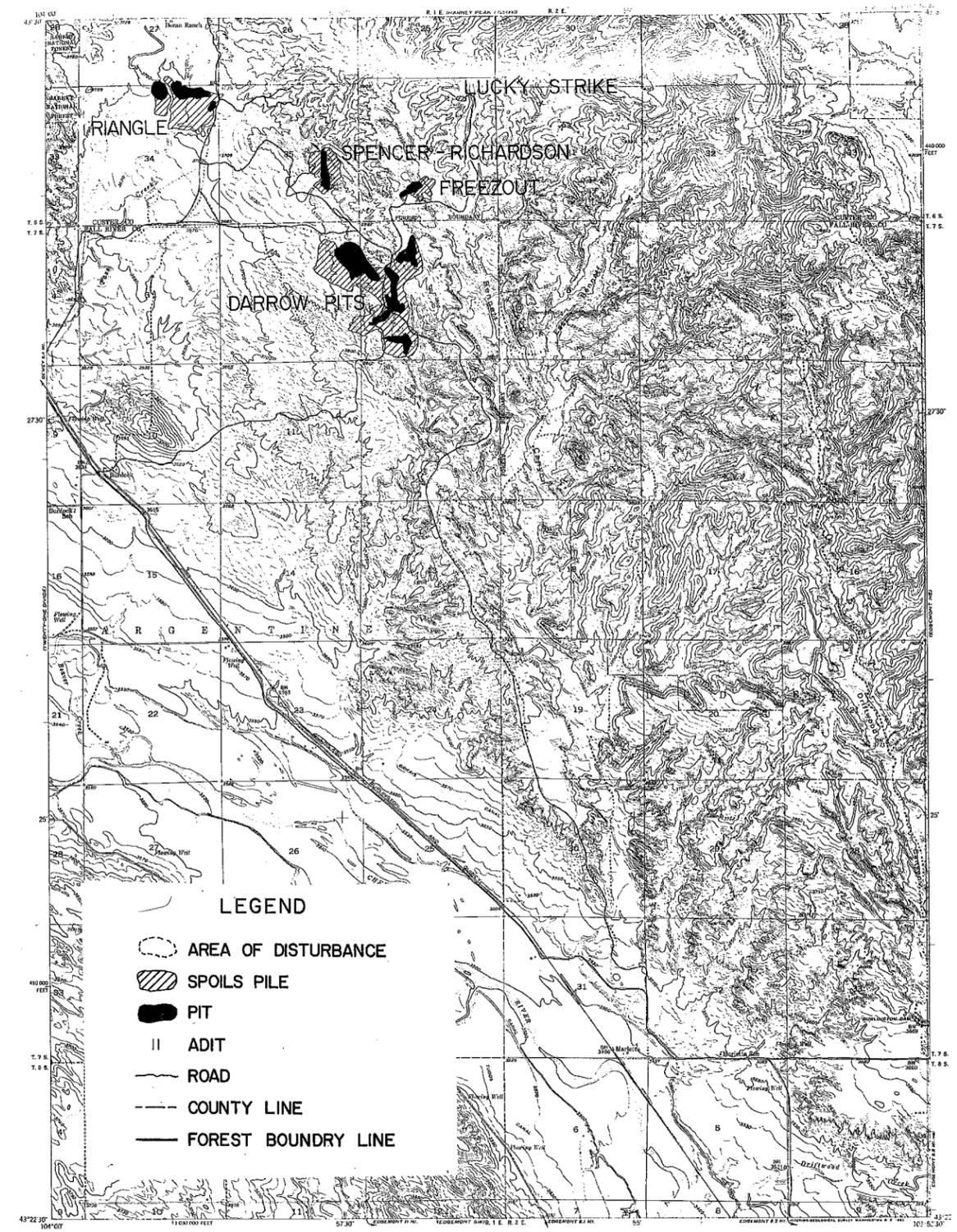


Figure 12 - Location of Mines Within Burdock Topographic Quadrangle.

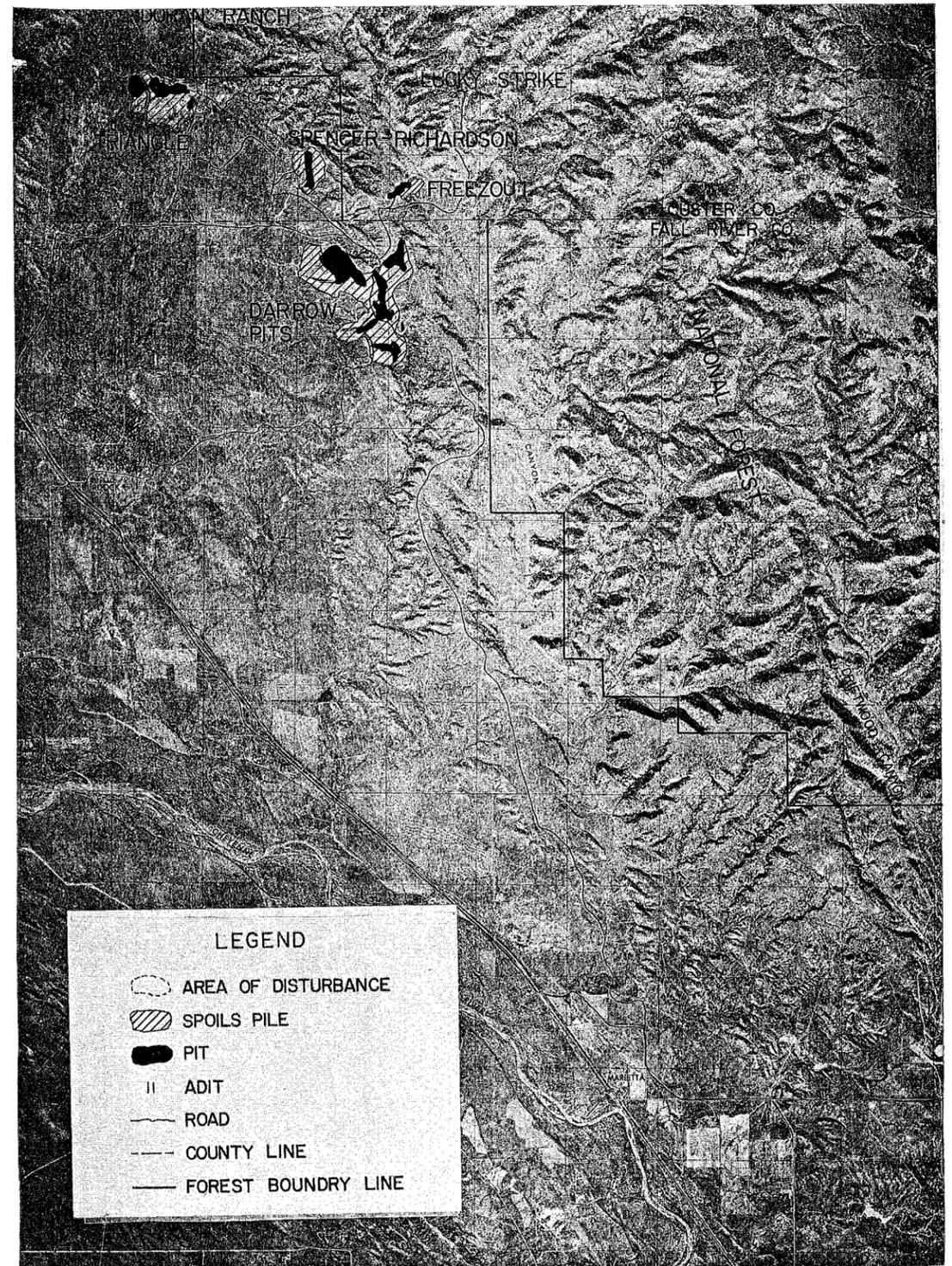


Figure 13 - Location of Mines Within Burdock Orthophotoquad.

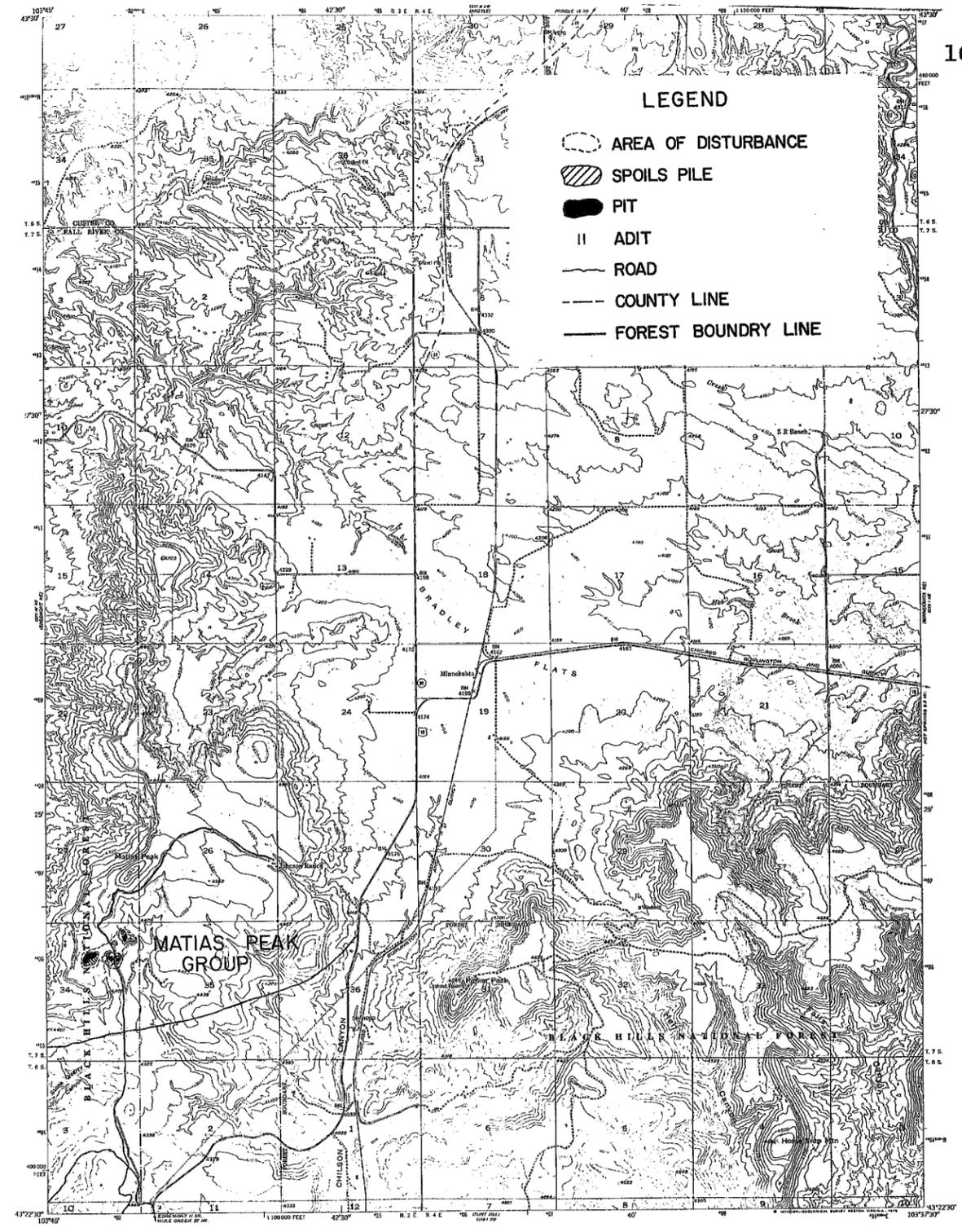


Figure 14 - Location of Mines Within Minnekahta Topographic Quadrangle.

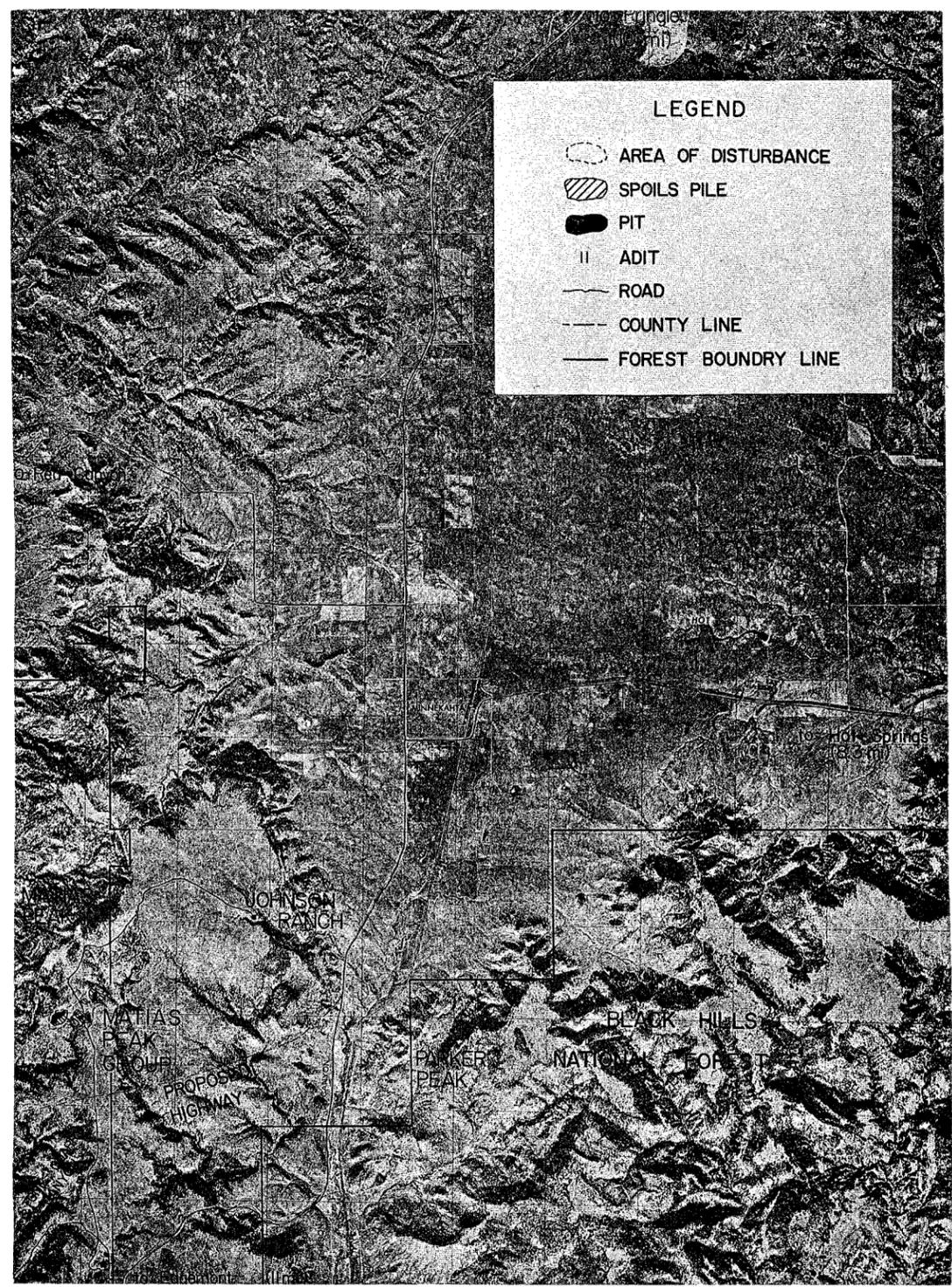


Figure 15 - Location of Mines Within Minnekahta Orthophotoquad.

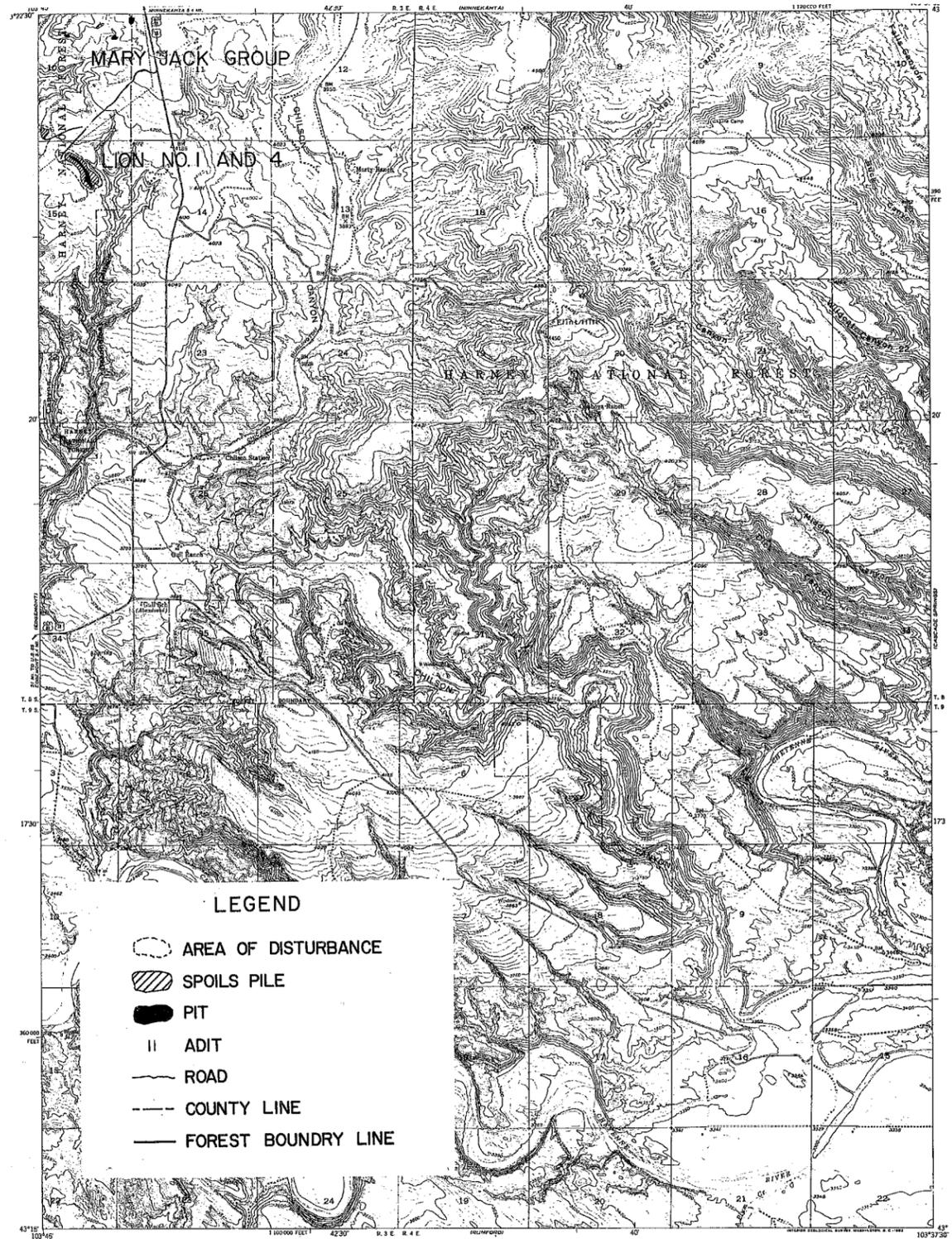


Figure 16 - Location of Mines Within Flint Hill Topographic Quadrangle.

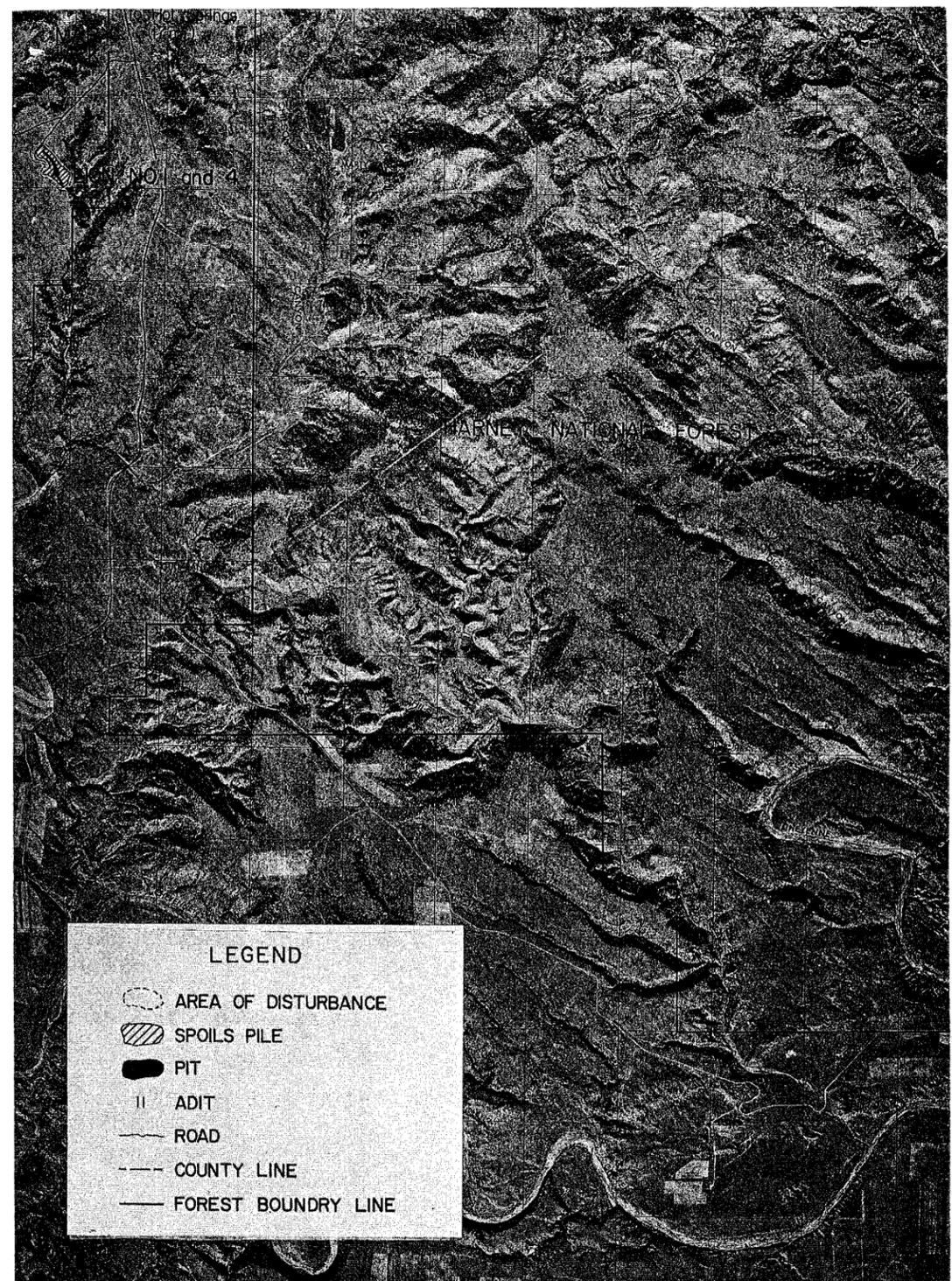


Figure 17 - Location of Mines Within Flint Hill Orthophotoquad.

MINE NAME	$\frac{1}{4}$ Section	Section	TWSP-Range
Matias Peak	NE $\frac{1}{4}$	34	7S-3E
Too Late	NW $\frac{1}{4}$	4	8S-3E
Hold No. 15	SE $\frac{1}{4}$	33	7S-3E
Holdup Group	SE $\frac{1}{4}$	28	7S-3E
Hot Point Group	SW $\frac{1}{4}$	28	7S-3E
Greenacre	NW $\frac{1}{4}$	33	7S-3E
Hay & Fay	SW $\frac{1}{4}$	20	7S-3E
Clarabelle	NE $\frac{1}{4}$ SE $\frac{1}{4}$	19	7S-3E
Shamrock	NE $\frac{1}{4}$	19	7S-3E
Dagmar	NE $\frac{1}{4}$ SW $\frac{1}{4}$	19	7S-3E
Gertrude	SW $\frac{1}{4}$ SE $\frac{1}{4}$	19	7S-3E
Pictograph Mesa	NW $\frac{1}{4}$ NW $\frac{1}{4}$	30	7S-3E
King	NE $\frac{1}{4}$ SW $\frac{1}{4}$	25	7S-2E
Verde	SE $\frac{1}{4}$ NW $\frac{1}{4}$	25	7S-2E
Trail Faction	SW $\frac{1}{4}$ SW $\frac{1}{4}$	24	7S-2E
Blue Chip	NW $\frac{1}{4}$ NW $\frac{1}{4}$	25	7S-2E
Ridge Runner	NW $\frac{1}{4}$ NE $\frac{1}{4}$	26	7S-2E
Road Hog	NW $\frac{1}{4}$	26	7S-2E
Coal Canyon Group	NE $\frac{1}{4}$ SE $\frac{1}{4}$	22	7S-2E
Get Me Rick	SW $\frac{1}{4}$ SW $\frac{1}{4}$	26	7S-2E
Virginia C	SW $\frac{1}{4}$ SW $\frac{1}{4}$	26	7S-2E
*Taylor	NW $\frac{1}{4}$ NE $\frac{1}{4}$	35	7S-2E
Valley View	SE $\frac{1}{4}$ SE $\frac{1}{4}$	26	7S-2E
Lion #1 & 4	NW $\frac{1}{4}$ NE $\frac{1}{4}$	15	8S-3E
Mary Jack	NE $\frac{1}{4}$ NE $\frac{1}{4}$	10	8S-3E
Freezeout	SE $\frac{1}{4}$ SW $\frac{1}{4}$	36	6S-1E
Lucky Strike	NE $\frac{1}{4}$ NE $\frac{1}{4}$	36	6S-1E
*Darrow	W $\frac{1}{2}$	1	7S-1E
*Spencer Richardson	SE $\frac{1}{4}$	35	6S-1E
*Triangle	NW $\frac{1}{4}$	34	6S-1E

* Not on USFS property

Table 1 - Location of Mines in Study Area

<u>MINE NAME</u>	<u>VOL. OF SPOILS(yds³)</u>	<u>AREA DISTURBED(acres)</u>
Matias Peak	12,554	34.4
Mary Jack	440	10.0
Too Late	227	1.4
Hold No. 15	28,356	67.4
Hold up Group	407	12.9
Hot Point Group	2,722	28.7
Greenacre	12,889	6.5
Hay & Fay	16,944	2.8
Clarabelle	5,324	5.7
Shamrock	2,407	8.6
Dagmar	10,370	11.4
Gertrude	4,737	27.3
Pictograph Mesa	400	2.8
King	10,615	11.4
Verde	3,611	17.2
Trail Faction	7,645	2.0
Blue Chip	52,996	74.6
Ridge Runner	22,407	27.3
Road Hog	2,059	11.4
Coal Canyon Group	27,944	8.6
Get Me Rick	2,196	30.1
Virginia C	131,133	34.4
Taylor	30,437	24.4
Valley View	<u>1,800</u>	<u>11.4</u>
TOTALS	390,620 yds ³	490.6 acres

Table 2 -Mines in Study Area Located on USFS Property.

mines. A 35 mm camera was used along with field notes to record adits, places of erosion, spoils, and other areas of environmental interest.

Table 3 shows a listing of uranium prospects not examined. Many of these were never mined and exist only as scattered uranium prospects or occurrences. Most are outside the study area and were not inspected.

The second step in the accomplishment of the objectives of this study was to evaluate the radiation hazard potential within the study area. There are a variety of risks from radiation hazards that accompany all phases of the uranium industry. These risks may be classified on the basis of how they have been caused (Morrison, 1980). They are as follows: (1) radiation effects by the inhalation of radon and its daughters; (2) radiation effects through the external exposure to gamma rays; (3) radiation effects by ingestion of heavy metals.

To evaluate the first of these risks, long-term radon progeny measurements of eight adits within the study area were made using Track Etch^R type F detectors. The Track Etch detectors were donated by Terradex Corporation, 460 North Wiget Lane, Walnut Creek, California, 94598.

In addition to the Track Etch detectors placed in the adits, one Track Etch cup was placed on the surface of a spoils pile (Figure 18) and one was placed in a control area (the author's home). The cups were left in place for a period of greater than 30 days. They were sealed in an aluminum pouch provided by Terradex Corporation until placement in the adits.

<u>MINE NAME</u>	<u>1/4 Sec.</u>	<u>Sec.</u>	<u>TWSP-Range</u>
Jim Rab Claim	S 1/4	Sec 23	6S-3E
Unnamed	SW 1/4	Sec 21	5S-1E
Unnamed	NE 1/4	Sec 19	6S-2E
Unnamed	S 1/4	Sec 23	6S-1E
Unnamed	NE 1/4	Sec 26	6S-1E
Elk Mountain	NE 1/4	Sec 9	6S-1E
Wolf Canyon		Sec 17	
		or 18	8S-6E
Unnamed	NW 1/4	Sec 7	8S-3E
Red Canyon	SE 1/4	Sec 29	7S-3E
Lucky Strike	NW 1/4	Sec 25	7S-2E
Trail Wind	NE 1/4	Sec 26	7S-2E
Walkan	W 1/2	Sec 25	7S-2E
Western Edge	NE 1/4	Sec 25	7S-2E
Little Windy	SW 1/4	Sec 30	7S-3E
Lucky Toss	SW 1/4	Sec 30	7S-3E
Ophelia	NW 1/4	Sec 30	7S-3E
Blue Note	NE 1/4	Sec 24	7S-2E
Yellow Cat	NE 1/4	Sec 30	7S-2E
Carnotite Cave	SE 1/4	Sec 19	7S-3E
Lazyman	SE 1/4	Sec 20	7S-3E
Hipockets	W 1/2	Sec 21	7S-3E
Eagle Eyrie	SW 1/4	Sec 4	8S-3E
Little Windy	SW 1/4	Sec 4	8S-3E
Acme	W 1/2	Sec 3	8S-3E
Cycad #1	NE 1/4	Sec 34	7S-3E
Schoonmaker	SE 1/4	Sec 34	7S-3E
Lakota Lodes	S 1/4	Sec 34	7S-3E
Amy	NE 1/4	Sec 12	9S-3E
Starlight	NW 1/4	Sec 25	8S-3E
Cheyenne Canyon	SE 1/4	Sec 11	9S-3E
Pabst #3	NW 1/4	Sec 1	8S-3E
Lo Ra	SE 1/4	Sec 2	9S-3E
Damsite Group	SW 1/4	Sec 31	8S-4E
Washboard	NW 1/4	Sec 31	8S-4E
Accidental	NE 1/4	Sec 30	8S-4E
Gould Mine	NE 1/4	Sec 11	8S-3E

Table 3-Uranium Prospects Not Examined

(from Elevatorski, 1977)



Figure 18 - Track Etch Detector Placed on Spoils Pile.

The cups were placed in adits selected on the basis of accessibility to the general public.

To evaluate radiation effects through external exposure to gamma rays a radiometric survey which measured gamma exposure rates of the mines located on USFS property was completed in the summer of 1981 by the author. In this survey, a 100 ft. grid pattern was marked off by pacing. At each intersection, readings were taken allowing them to become stabilized by waiting one minute. The actual counter reading in counts per minute or mR/hr was then recorded on maps (Appendix A). Also included on these maps are the relative size and distribution of the spoils within the individual mine site.

The counter readings were used to find locations with the "hottest" spoils. These locations were then sampled. Due to time and money limitations, only fifteen samples were analyzed. Samples were chosen on the basis of accessibility to the general public.

The fifteen samples were then analyzed for radium-226 using a sensitive gamma spectrometric procedure based on the measurement of bismuth-214 after sealing the sample in a metal can to prevent the loss of the radon-222, daughter of radium-226 (Perkins, 1981).

Radiation levels in ground water, surface water and vegetation, as recorded by TVA, were used to evaluate radiation effects by ingestion of heavy metals.

Finally, recommendations were made, based on the results to be discussed in the next chapter.

RADIOACTIVITY

When evaluating the radiometric qualities of an area, the first question to arise is: "What constitutes a safe level of exposure?". In order to address this question, an examination of uranium and its daughter products is necessary. Figure 19 lists the radioactive isotopes of the uranium-238 decay series.

The uranium-238 decay series can be divided into four parts. They are as follows: (1) the long-lived isotopes, ^{238}U , which are considered to be in equilibrium in nature; (2) ^{226}Ra ; (3) ^{222}Rn and its short-lived daughters; (4) the long-lived radon daughters, ^{210}Pb , ^{210}Bi , and ^{210}Po (EPA, 1976). These isotopes occur as coating on sand grains or as fillings or cement in interstitial spaces where it has accumulated by water deposition.

There are three types of ionizing radiation from the decay of uranium-238: (1) alpha particles, which are basically the nucleus of a helium atom; (2) beta particles, which are electrons, and positrons; (3) gamma radiation, which is a form of electromagnetic radiation of shorter wavelengths and therefore more penetrating (Morrison, 1980). The majority of the physiological hazards are due to the emission of gamma radiation and alpha radiation.

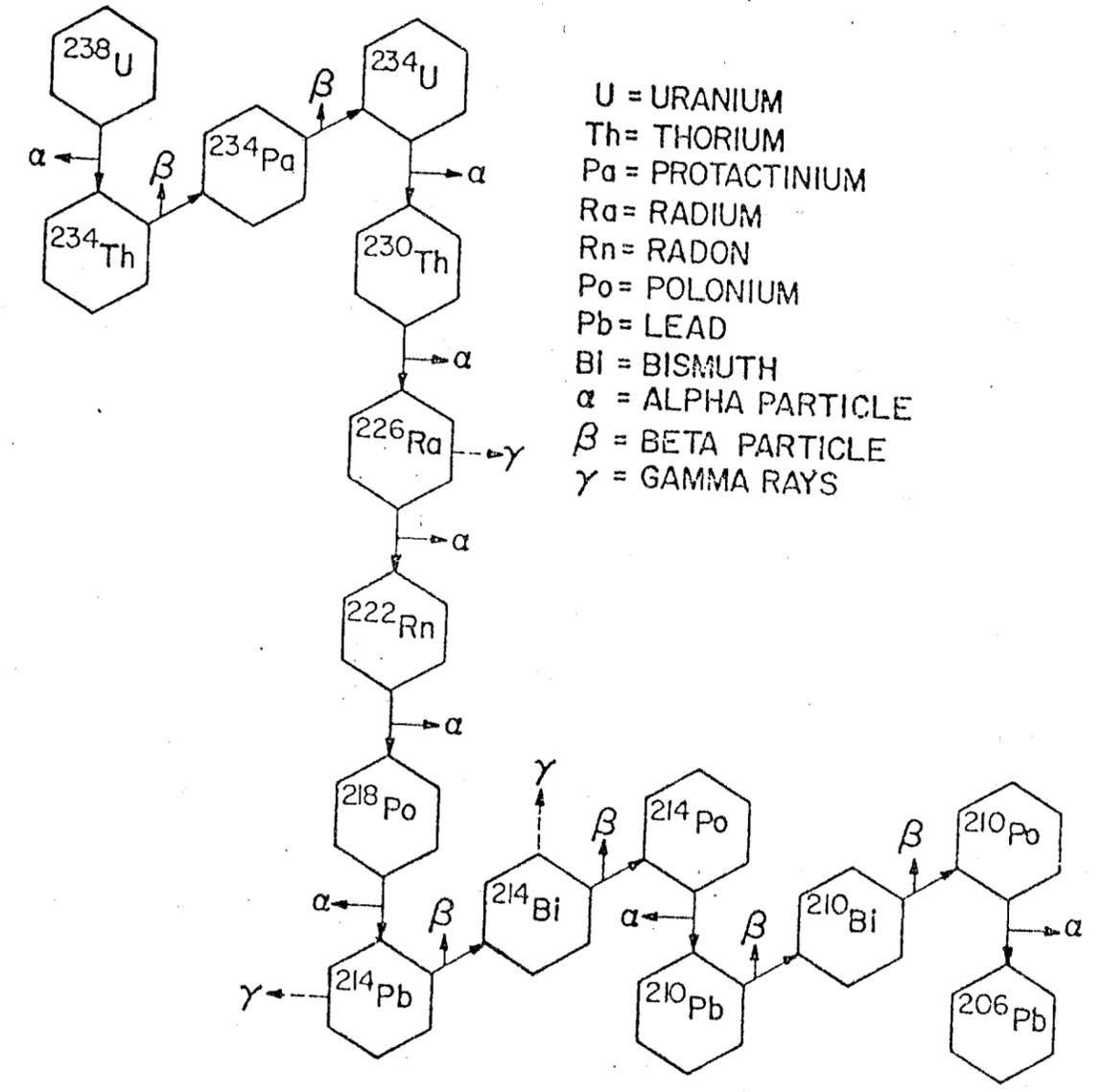


Figure 19 - Principal Branch of Uranium-238 Decay Series (DOE, 1979)

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The uranium mining within the study area was done above-ground and in under-ground adits. The principal difference between under-ground and surface mining in terms of radiation hazard is in the types of radiation exposure. For above-ground, the major radiation exposure is from gamma rays. Underground, alpha radiation from ingestion and inhalation of short half-life radon daughters is the major source of radiation exposure.

Radium isotopes are present within all soils in varying states of equilibrium with its parents. Radium-226 decays by the emission of an alpha particle to radon-222, an inert gas with a half-life of 3.8 days. The atmospheric concentration of radon-222 depends upon: (1) the degree of air circulation; (2) the concentration of radon-226 in the soil, and; (3) the degree of equilibrium between radon and its daughter products. Because the daughter products are electrically charged, they tend to attach themselves to the dust particles within the atmosphere. Therefore, the primary source of contamination is through inhalation (EPA, 1978).

Since more than one radionuclide is involved, a total energy unit has been developed (Yamamoto, 1980). This unit, the working level (WL) is also designed to be a safe occupational level of exposure.

Ledbetter (1980) defines one WL as any mixture of short half-life radon daughters in a liter of air which will ultimately produce 1.3×10^5 million electronvolts (MeV) of alpha energy.

The WL was defined on the basis of the short-term alpha energy from 100 pCi/L of radon in equilibrium with its daughters. Disequilibrium is quite important to the relation between pCi/L of radon with an age of twenty minutes would be in about 30 per cent equilibrium. This would result in about .75 WL.

The problem of equilibrium arises because the radiation measured does not come primarily from the uranium but from its daughter elements. When uranium is disturbed or separated from its radioactive daughter elements, it immediately starts to decay and reform the elements until all of them in the decay series have accumulated in their original proportions. That is, each element is present in an amount so that it decays to the element below it in the series at the same rate as it is produced from the element above it. When this happens, an equilibrium is established. In equilibrium, no further change takes place in the quantity of any of the daughter elements until the sample is disturbed or subjected to a chemical change.

At the time of mine development, a uranium miner could work in an atmosphere containing one WL. This safe level has now been reduced by a factor of three (Yamamoto, 1980).

The radiation doses allowed for the general public have been 1/10th the occupational limits. This fraction is based on a philosophy that the general public represents a larger group at risk and that they are not being paid for taking the

risk (Ledbetter, 1980).

For the purpose of this study the limit for "safe exposure levels" was set at 0.33 WL for alpha radiation. This corresponds to the recommended occupational exposure levels. For an occasional visitor to the study area, a maximum level of 1.0 WL was set by the author. These levels represent the authors opinion and should be used only as a relative guide.

It should be noted that as of March 1975, the Environmental Protection Agency has adopted the policy of assuming a linear relationship between population exposures to ionizing radiation and its biological effects. There is, therefore, some potential ill health attributable to any exposure to ionizing radiation and the magnitude of the potential ill health is directly proportional to the magnitude of the dose received (Yamamoto, 1980). Thus, there is some potential hazard in all radiation.

In the Federal Register's "Proposed Cleanup Standards for Inactive Uranium Processing Sites" (1980) a maximum limit of 25 mrem/yr for all releases, excluding radon and its daughters is recommended. This corresponds to only 5 pCi/gm of radium and is the maximum amount allowed without special treatment (CFR, 1980^a). The long-used exposure dose limits of 2 mR/hr and 100 mR/wk are still the basic monitoring limits in the Texas Regulation (Ledbetter, 1980).

SAMPLE	FEDERAL STANDARDS	STUDY AREA
AIR	.003 WL	.003 WL
SOILS	5.0 pCi/g	5.0 pCi/g
WATER	5.0 $\mu\text{g}/\text{l}$	5.0 $\mu\text{g}/\text{l}$
OPEN LAND gamma exposure limit	20 μR above background or 0.02 mR above back- ground	*45 counts/min. or .048 mR

Table 4 - General Public Radiation Standards

Values were taken from Federal Standards (40 CFR-192) for inactive mill tailings.

* Background in the study area as measured by the author is 25 cpm or 0.028 mR

The Federal Register's proposed standards are quite low when compared to the Texas Regulation which are quite high. For the purpose of this study, an intermediate value of 100 pCi/g was chosen as an acceptable "safe limit" for gamma radiation. This value is lower than the Texas regulations for occupational safety, however, it is ten times higher than the maximum amount recommended by the Federal Register.

GAMMA RADIATION

Gamma radiation is measurable in spoils. The levels are usually a few tenth mR/hr. Samples for analysis of gamma radiation in the study area were obtained from spoils on the basis of their radioactivity as determined from field survey which measured gamma exposure rates.

There are three sources of gamma radiation that influence the reading obtained by the detectors used in this study:

(1) cosmic radiation which originates from outer space and gives low-level high energy radiation; (2) radioactive nuclides which occur naturally in the atmosphere, namely radon-222 and bismuth-214, and (3) the natural radioactive nuclides present in the surficial layers of rock.

All persons are subject to low-level radiation exposure from natural sources occurring in the environment. The amount and type of this radiation varies from place to place and time to time (Henry, 1969). As a matter of fact, the southern Black Hills in a virgin condition 100 years ago, undoubtedly had higher than average background radiation due to the uranium deposits in the area (Redden, personal comm., 1982). Since

the actual level of radiation varies, the actual background at any location can only be determined from direct measurements. Within the study area the background count is approximately 25 counts per minute, as measured with a simple Geiger-Mueller survey instrument, or .028 mR/hr as measured with a scintillometer-type survey instrument.

RADIOLOGICAL MAPPING

The basic part of a Geiger-Mueller survey instrument is a metal tube filled with an inert gas. A voltage from batteries is applied between a metal wire running the length of the tube and the tube wall. Then the counter is placed near a source of radioactivity, some of the radiations strike the tube filled with gas, creating a pulse of electric current which is then recorded. Alpha particles are stopped by the tube wall. Beta particles have a greater penetrating power, and some can enter the tube wall but most do not. Gamma rays penetrate the tube with much greater numbers, producing electrical pulses.

The scintillometer-type survey instrument, like the Geiger-Mueller type, records principally gamma rays. The radiation produces tiny flecks of light called scintillations in a potassium iodide crystal. The scintillation counter is of greater sensitivity due to the fact that the crystal reacts to a much larger proportion of gamma rays than does the Geiger tube. This means that the scintillometer can accurately detect a much smaller change in the amount of radioactivity.

Mass effect is probably the most important factor to con-

sider when using these types of survey meters. The principal effect relates directly to the fact that a counter measures the total amount of radiation from a source. The total amount of radiation will vary with the size of the source as with the proportion and type of radioactive substances within the source. The source is defined as the material from which the radiation is emitting. This could be the walls of the adits, the spoils, or the ore body itself. The closer the source, the higher the readings. Efforts to compensate for mass effects were taken. All measurements were taken at approximately three feet (1 m) from the source. If the reading was greater than .06 mR/hr with the first meter or 200 counts per minute with the second meter, a second reading was taken. These readings are approximately four times background in the abandoned mine sites. This reading was taken as close to the source as possible the second time.

The scintillometer/Geiger counter readings obtained were then plotted on maps (Appendix A) and used to get a general profile of the radioactive conditions at each site. A summary of results of the radiometric survey are included in Table 5. Both survey instruments were calibrated before and after each use using a standard calibration disk.

SPOIL SAMPLING FOR Ra-226

The results from the spoil sampling analysis for ^{226}Ra are seen in Appendix A. The average spoil sample contained 382.1 pCi/g radium-226. The lowest concentration (2.660 pCi/g) was obtained from the Hot Point Group and the highest (1643.0 pCi/g)

PG.	Name of Mine	# Grid Location	Highest Reading	Lowest Reading	Mean	Std. Deviation
A-1	Matias Peak Group	55	.17 mR/hr	.028 mR/hr	.042 mR/hr	± .048 mR/hr
A-3	Mary Jack Group	16	.16 mR/hr	.028 mR/hr	.081 mR/hr	± .001 mR/hr
A-5	Lion No. 1 and 4	11	.20 mR/hr	.028 mR/hr	.057 mR/hr	± .005 mR/hr
A-6	Lion No. 1 and 4	32	.32 mR/hr	.028 mR/hr	.127 mR/hr	± .008 mR/hr
A-8	Too Late	6	700 cpm	150 cpm	329 cpm	± 416 cpm
A-9	Hold No. 15 (1)	29	.1 mR/hr	.028 mR/hr	.041 mR/hr	± .004 mR/hr
A-10	Hold No. 15 (2)	32	350 cpm	25 cpm	150.7 cpm	± 176.5 cpm
A-11	Holdup Group	8	.1 mR/hr	.025 mR/hr	.054 mR/hr	± .062 mR/hr
A-12	Hot Point Group	13	.45 mR/hr	.032 mR/hr	.119 mR/hr	± .178 mR/hr
A-14	Greenacre	15	.35 mR/hr	.048 mR/hr	.09 mR/hr	± .125 mR/hr
A-16	Hay and Fay	11	.30 mR/hr	.028 mR/hr	.085 mR/hr	± .14 mR/hr
A-18	Clarabelle	12	400 cpm	50 cpm	139.6 cpm	± 179.7 cpm
A-19	Shamrock	22	275 cpm	50 cpm	102.2 cpm	± 120.9 cpm
A-21	Dagmar	13	300 cpm	50 cpm	101.9 cpm	± 166.7 cpm
A-22	Gertrude	18	200 cpm	25 cpm	86.1 cpm	± 98.02 cpm
A-24	Pictograph Mesa	4	400 cpm	100 cpm	193.75 cpm	± 259.0 cpm
A-25	King	20	250 cpm	25 cpm	88.75 cpm	± 153.07 cpm
A-28	Verde (1)	9	400 cpm	25 cpm	116.6 cpm	± 166.67 cpm
A-30	Verde (2)	7	100 cpm	50 cpm	71.42 cpm	± 79.6 cpm
A-31	Trail Faction	22	500 cpm	50 cpm	127.27 cpm	± 180.5 cpm
A-32	Blue Chip	33	450 cpm	50 cpm	107.57 cpm	± 139.0 cpm
A-33	Blue Chip	19	400 cpm	50 cpm	107.89 cpm	± 135.27 cpm
A-34	Blue Chip	5	400 cpm	50 cpm	200.00 cpm	± 267.86 cpm
A-35	Blue Chip	12	100 cpm	50 cpm	56.25 cpm	± 60.57 cpm
A-36	Ridge Runner	11	750 cpm	75 cpm	193.18 cpm	± 281.02 cpm
A-38	Taylor Group	27	300 cpm	25 cpm	156.48 cpm	± 173.5 cpm
A-39	Get Me Rick	13	400 cpm	25 cpm	169.20 cpm	± 210.0 cpm
A-41	Virginia C	28	1500 cpm	50 cpm	185.71 cpm	± 332.0 cpm
A-43	Coal Canyon	12	1000 cpm	25 cpm	166.66 cpm	± 320.0 cpm

Table 5 - Summary of Results From Radiometric Survey.

was obtained from the Virginia C Group. A summary of this data is given in Table 6.

AIR SAMPLING

The potential hazards within the study area, in terms of WL's which measure alpha radiation, can be measured within the confined adits. Potential hazards from this source are primarily from the inhalation of the short-term daughters of radon. Radon-222 is the radioactive isotope from the uranium-238 decay chain having a relatively long half-life of 3.8 days. A high probability exists that a person inhaling this gas directly would exhale the gas before the emission of an alpha particle. The main hazard comes from the short term daughters: ^{218}Pa ; ^{214}Pb ; ^{214}Bi ; and ^{214}Po , which have a much shorter half-life and emit alpha particles within the lungs (EPA, 1978).

The amount of alpha particles emitted may be measured with Track Etch type F detectors donated by the Terradex Corporation.

Track Etch devices consist of thin sheets of alpha-sensitive material that are passively exposed to the atmosphere within the adit. Alpha particles from radon and radon daughters produce damage tracks in the sensitive material. These tracks were made visible by an etching technique, and then counted (Perkins, 1981).

The results expressed in pCi/L are shown in Table 7. The radon exposure rate was obtained from Terradex Corporation. The working levels were calculated from these exposure rates

PAGE	MINE NAME	^{226}Ra
A-2	Matias Peak Group	90.44 pCi/gm
A-4	Mary Jack Group	72.15 pCi/gm
A-7	Lion #1 and 4	123.8 pCi/gm
A-13	Hot Point Group	2.66 pCi/gm
A-15	Greenacre	< 182.9 pCi/gm
A-17	Hay and Fay	< 264.8 pCi/gm
A-20	Shamrock	144.8 pCi/gm
A-21	Gertrude	1075.0 pCi/gm
A-26	King	97.57 pCi/gm
A-27	King	126.5 pCi/gm
A-29	Verde	614.8 pCi/gm
A-37	Ridge Runner	357.8 pCi/gm
A-40	Get Me Rick	313.5 pCi/gm
A-42	Virginia C	1643.0 pCi/gm
A-44	Coal Canyon	619.9 pCi/gm

Table 6 - Results of Spoils Sampling for Radium-226.

MINE	RADON	WORKING LEVEL
MATIAS PEAK	46.82	0.4 WL
HOT POINT GP.	2422.27	21.8 WL
GREENACRE	2954.40	26.6 WL
GREENACRE	268.26	2.4 WL
BLUE CHIP	55.97	0.5 WL
DARROW	178.47	1.6 WL
DARROW	101.42	0.9 WL
CONTROL	6.25	0.06 WL

Table 7 - Track Etch Results

Radon exposure rates in pCi/liter

WL's at 90% equilibrium

1 pCi = 10⁻¹²Ci

1 Ci = 1 curie = 3.7 x 10¹⁰ radioactive disintegrations/sec.

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using the assumption that the degree of equilibrium between radon and its daughters is about 90 percent. One sealed cup containing 100 pCi/L of radon with an age of 10 days would be in about 90 percent equilibrium.

INGESTION OF RADIONUCLIDES

The last of the radiologic hazards to be evaluated, proposed by Morrison, 1980, is from ingestion of radioactive materials. To evaluate possible hazards from the ingestion of radioactive materials, radioactive levels from ground water and vegetation in the study area were needed. A search of the literature provided two tables from Tennessee Valley Authority (TVA) showing radioactive levels from ground water and vegetation within the study area. These are presented in Tables 8 and 9.

Uranium is present in minor amounts in all ground waters tested within the study area. The four wells listed are located in the vicinity of the Darrow Pits. Actual amounts of natural uranium-238 in the study area vary from 0.08 ug/L to 0.87 ug/L. TVA reports these values are well below the maximum permissible concentrations of uranium.

There are 133.2 pCi/L of dissolved radium-226 in the Burdock well B-2. This is the highest value reported by TVA and is not considered to be hazardous. The values represented by these wells are high, when compared to EPA maximum permissible concentrations as they are located in or very close to ore bodies.

Vegetation samples analyzed by TVA show only slight amounts of natural uranium and radium-226. These values are somewhat

Sampling Location	Natural U		230Th		226Ra Dissolved		210Pb		210Po	
	μg/l		pCi/l		pCi/l		pCi/l		pCi/l	
Burdock Well B-1 (Fall River)	0.87		1.1 ± 0.2		0.55 ± 0.03		b		b	
	0.25		0.04 ± 0.07		0.43 ± 0.03					
	0.25		0.3 ± 0.2		0.91 ± 0.04					
	0.41		0.4 ± 0.1		0.35 ± 0.03					
Burdock Well B-2 (Lakota)	9.49		0.5 ± 0.1		133.2 ± 0.4		c		c	
	0.32		0.06 ± 0.07		80.6 ± 0.3					
	0.19		0.05 ± 0.10		33.2 ± 0.2					
Miles Spencer Ranch Well	0.08		0.04 ± 0.07		1.87 ± 0.05					
Preston Richardson Ranch Well	0.16		0.01 ± 0.07		4.42 ± 0.08					

b - Insufficient sample.
c - Sample lost during analysis.

Table 8 - Radioactivity Levels - Edgemont Project Area
Ground Water (Dissolved Activity) (from TVA, 1979)

Sampling Location	Gross α pCi/E	Gross β pCi/E	Natural U μCi/E	²³⁰ Th pCi/g	²²⁶ Ra pCi/g	²¹⁴ Pb pCi/g	¹³⁷ Cs pCi/g
Burdock, Southeast; East Central Section 11	0.01 ± 0.01b 0.5 ± 0.2	10.1 ± 0.1	0.14 0.22 e	0.17 ± 0.02 0.19 ± 0.03	0.30 ± 0.05c 0.11 ± 0.01 0.28 ± 0.01	0.30 ± 0.05 d	0.2 ± 0.03 d
Burdock, West; North Central Section 15	0.3 ± 0.2	-	0.14 0.12 0.15	0.19 ± 0.03 0.00 ± 0.01 -0.002 ± 0.004f	0.08 ± 0.004 0.12 ± 0.01 0.17 ± 0.02 0.10 ± 0.001	-	-
Pit #6 Area; Northeast Section.12	0.9 ± 0.2	-	0.07 0.21 0.05 0.17 0.13 0.13	0.13 ± 0.02 0.19 ± 0.03 0.03 ± 0.01 0.01 ± 0.02 0.01 ± 0.01 0.03 ± 0.02	0.19 ± 0.01 0.46 ± 0.02 0.15 ± 0.006 0.11 ± 0.01 1.01 ± 0.04 0.05 ± 0.001	d	0.2 ± 0.02
Runge, East; Central Section 31	1.0 ± 0.2	-	0.04 0.03 e 0.24 0.21 0.17	0.03 ± 0.01 0.10 ± 0.01 e 0.05 ± 0.14 0.01 ± 0.01 0.01 ± 0.02	0.15 ± 0.01 0.65 ± 0.01 0.14 ± 0.007 0.17 ± 0.01 0.16 ± 0.02 0.22 ± 0.001	0.6 ± 0.07 d	0.2 ± 0.02
			0.22 0.02 e 0.90 0.42 0.54	0.14 ± 0.02 0.01 ± 0.01 e 0.15 ± 0.03 0.01 ± 0.01 0.03 ± 0.01	0.26 ± 0.01 0.07 ± 0.004 0.10 ± 0.007 0.34 ± 0.01 0.31 ± 0.02 0.24 ± 0.001	0.8 ± 0.1 d	0.4 ± 0.04

b - The error reported is the 1-sigma counting error.

c - Results obtained by gamma spectroscopy using a Ge(Li) detection system.

d - Method may produce results which are of questionable reliability.

e - None detected

f - Insufficient sample.

- Negative value is an artifact of counting statistics and does not infer a negative activity.

Analysis for Ra-226 and Bi-214 using this
 (from TVA, 1979)

Table 9 - Radioactivity Levels-Edgement Mining District-Vegetation

less than those reported for ground water and are all below maximum permissible concentrations.

Following the initial discovery of uranium, prices rose sharply due to a great demand for nuclear power plants. The phase-out of the federal uranium procurement program in the early 1960's caused the prices to fall as sharply as they had risen. The decrease in the price of uranium was accompanied by the closure of many of the uranium mines all over the United States including those of the study area. Laws and regulations concerning reclamation of these mines were non-existent. The depressed prices put the original companies in a financial bind resulting in abandonment without concern for reclamation. The impacts observed by the author in field investigations are presented in the following sections.

FIELD INVESTIGATION OF IMPACTS

Uranium mining usually involves considerable disturbances of surface lands and associated biota. This is especially the case for open pit mines in which ore bodies are located less than 70 to 80 feet (21 to 24 m) below the surface, as they are in the study area (Figure 20). Large quantities of overburden and topsoil were removed during the mining process. Disturbed surface areas of up to 200 acres (81 ha) are located throughout the study area. Topsoil and overburden were not separated in the early mining operation and are now, in many



Figure 20 - Showing Present Condition of a Surface Mine in the Blue Chip Group.

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cases, covered with spoils. The physical characteristics of each mine within the study area are listed in Table 9.

Unplugged drill holes are common in the area and are often obscure (Figure 21). They are up to 200 feet (61 m) deep and 6 to 8 inches (15 to 20 cm) in diameter. These holes represent a physical hazard to livestock, wildlife, and man. The drill pads that accompany these holes are, for the most part, unreclaimed and may be seen on aerial photographs.

Throughout the study area, numerous dozer scrapes, roads, and trenches are common. Natural vegetation has failed to reclaim these disturbances. Lack of vegetation has resulted in erosion which has left many of the roads impassable (Figure 22). Lack of vegetation is also a factor in the erosion of spoils (Figure 23).

Many of the sites appear to have been "dozer mined". These sites have numerous bulldozer slashes which range from 6 to 40 feet (1.8 to 12 m) in width and up to 150 feet (46 m) in length. Most are only 4 to 10 feet (1.2 to 3 m) in depth. Fourteen of these slashes were counted in the Valley View site. Radiometric survey showed only slight elevation of external radiation above background. It is the opinion of the author that these "dozer mined" areas were only prospect trenches which were abandoned because no significant ore bodies were discovered.

Many of the mine sites are covered with the trash of

	Prospect trenches	Open pits	Bad access roads	Drill holes	Dozer damage	Extreme erosion	Stagnant ponds	Loose pit edges	Dangerous adits	Adits	Fenced	Mining refuse	Garbage dump	Ventilation shafts	Livestock	Track Etch (a)	Soil sample
Matias Peak																	
Mary Jack	X																
Lion No. 1 & 4	X	X										X	X				
Crandall Group				X													
Too Late		X															
Hold No. 15	X	X										X					
Holdup Group	X	X															
Hot Point Group		X										X					
Greenacre		X										X					
Hay & Fay		X										X					
Clarabelle		X										X					
Shamrock	X	X										X					
Dagmar	X	X										X					
Gertrude		X										X					
Pictograph Mesa		X										X					
King		X										X					
Verde		X										X					
Trail Faction		X										X					
Blue Chip		X										X					
Ridge Runner		X										X					
Valley View		X										X					
Taylor		X										X					
Virginia C		X										X					
Get Me Rick		X										X					
Road Hog		X										X					
Coal Canyon Group		X										X					
Lucky Strike		X										X					
Freezeout		X										X					
Darrow		X										X					
Triangle		X										X					
Spencer-Richardson		X										X					
Wicker-Baldwin		X										X					

Table 10 -Physical Characteristics of Mines Within the Study Area. Column (a)-Track-Etch-Alpha Sensitive Device Used to Measure Radon-222 Provided by Terradex Corporation.

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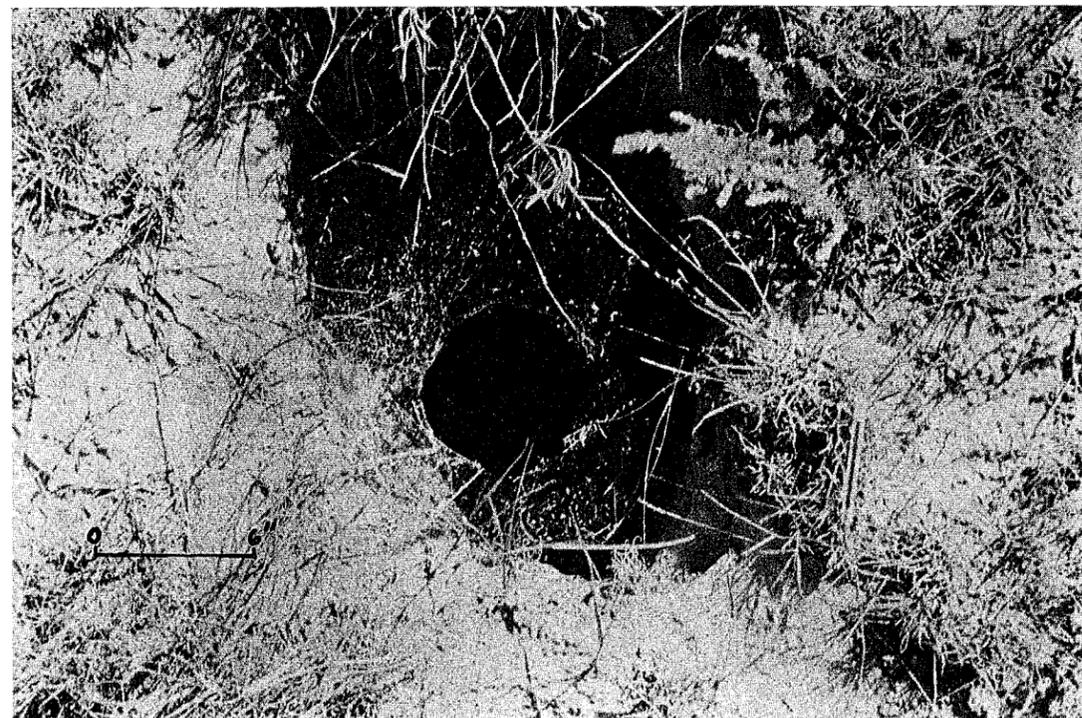


Figure 21 - Unplugged Drill Hole.



Figure 22 - Hold #15, Showing Poor Road Conditions.

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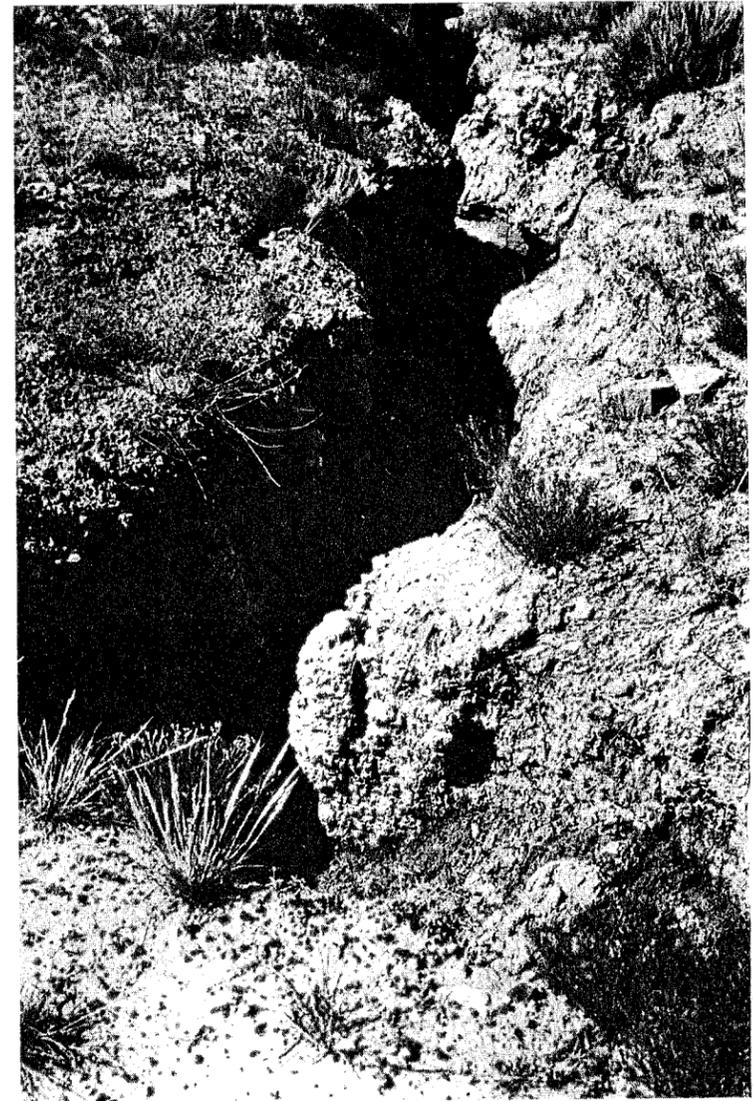


Figure 23 - Lion #1 and 4, Showing Spoils Erosion.

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mining operations. Numerous items including blasting caps, wire, refrigerators, oil barrels, and a rusted-out bulldozer were left as these mines were abandoned. No mine site investigated in the study area was void of this trash.

The general public has developed an attitude of apathy toward these already disturbed lands. Many of the pits including those on USFS property have been used as garbage dumps. The wind has blown trash from these dumps to undisturbed lands. The mining roads have also been littered by trash from recreational users.

There are many physical hazards in the study area as a result of the unreclaimed condition of the mine sites. The rims of many of the pits are extremely unstable as evidenced by slumping. These rims are unmarked and many remain unseen as they are approached. At night one cannot see some of the pits until less than 25 feet (7.6 m) away from them. The Trail Faction and the Lion No. 1 and 4 could easily be driven into at night as a result of their obscure nature.

Adits also represent a physical hazard (Figures 24 and 25). Some of the adits are in fair condition, but most are quite dangerous. Cave-ins are common as evidenced by debris on the floor of the adits (Figure 26). Structural supports in many adits have been left standing but serve no purpose since the cave-ins. These adits are used and explored by the general public for recreation. Evidence of camping near the entrances



Figure 24 - Potentially Dangerous Adit (Clarabelle Mine)

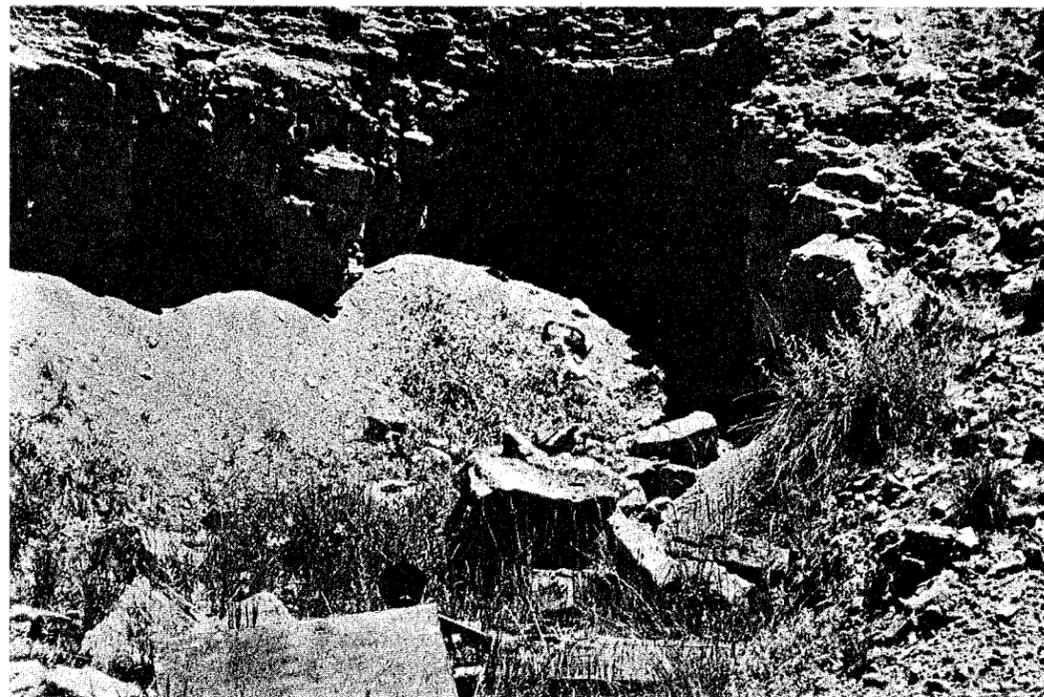


Figure 25 - Hot Point Group Showing Potentially Dangerous Adit.

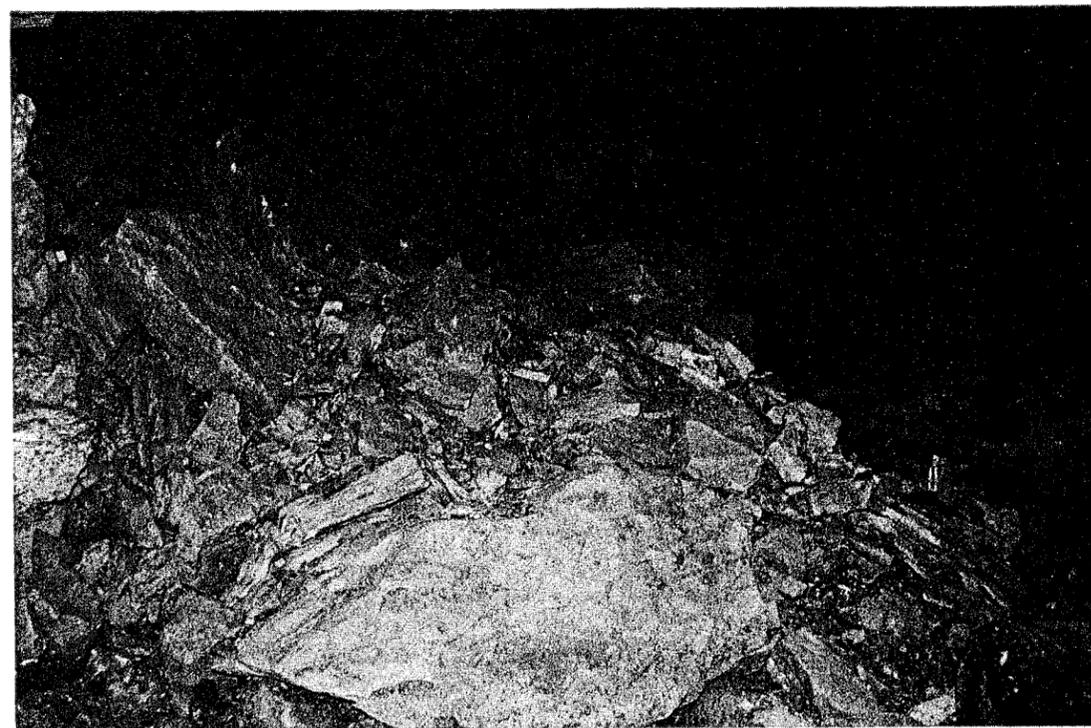


Figure 26 - Debris on Adit Floor Caused By a Cave-In.

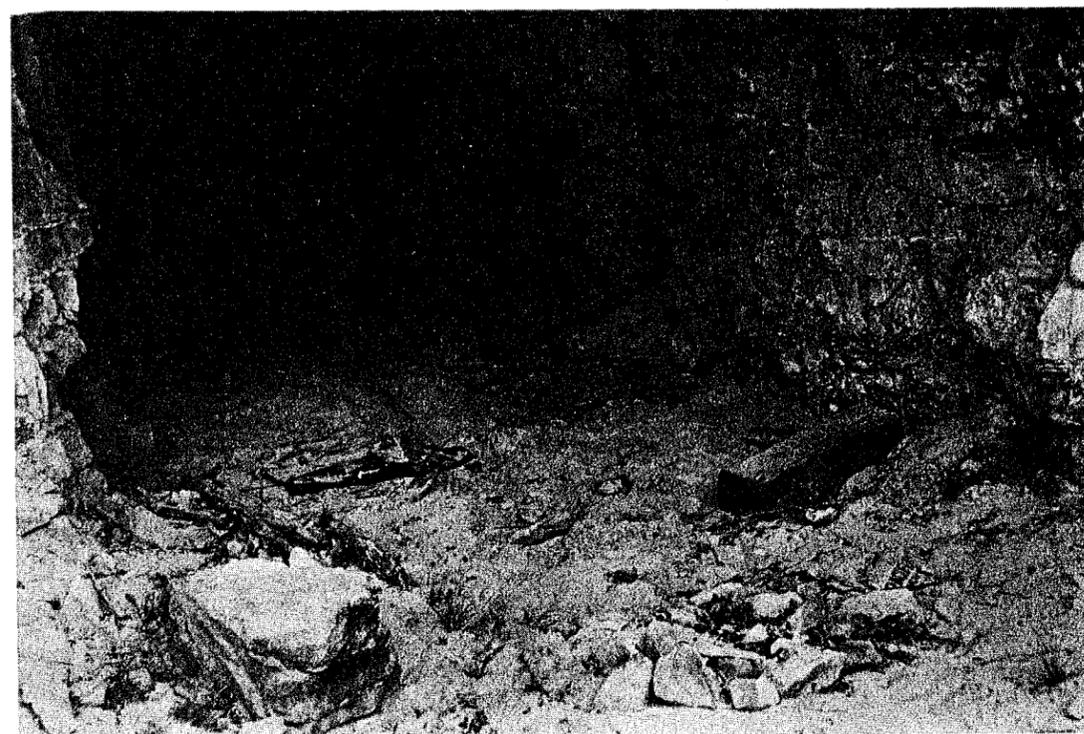


Figure 27 - Pictograph Mesa Claim, Showing Evidence of Camping Near Adit Entrance.

near the entrances of these adits was seen in many locations (Figure 27). The footprints of small children were also recognized on the floor of several adits. Local ranchers in the area are using some of these adits for cattle shelters.

The adits not only represent a physical hazards but also a radiological hazards.

Ventilation shafts have been left unmarked and are now covered by vegetation. Two shafts were found within the study area by the author (Figure 28). They are both about two feet (.6 m) wide and up to 60 feet (18 m) deep. Both are obscure and quite dangerous to man as well as domestic animals and wildlife.

SURFACE AND GROUND WATER

Surface runoff patterns, surface and ground water quality, and flow patterns may be adversely affected by open pit and under-ground mines (Goodier, 1978). No measures were taken in the study area to prevent degradation of water quality during the early mining operations.

Surface water runoff from the mine sites has increased due to the lack of vegetative cover. This resulted in the erosion of spoils, roads, and of the mines. Sediment loads in all areas of disturbance have increased, changing the microclimate at each location, however, dispersion of radio-nuclides, appears to be only local, visually estimated by the



Figure 28 - Unmarked Ventilation Shaft in Study Area.

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author at less than 100 m.

Most of the mines in the study area are above water table. As a result, the mines act as a sink to collect runoff and are naturally "silting in". Much of the runoff goes to stagnant ponds down-drainage from the mines or in the open pits. These stagnant ponds are used occasionally by livestock and wildlife as a source of water. This may possibly result in the ingestion of harmful trace elements. These stagnant ponds have also increased the presence of biting flies and mosquitoes as observed by the author.

Ground water quality has probably been little affected by the mine sites. Very little if any contamination is seen as a result of the early mining activities in the study area as most of the contamination appears to be natural.

TVA studies of surface waters draining the study area, and USGS data show that early mining has probably only slightly affected surface water quality, mostly in the amount of total dissolved solids. No increases or decreases in the amounts of contaminating elements above or below the mine sites are shown.

AIR QUALITY

The quality of air within the study area has only slightly been affected by the unreclaimed condition of the mines. Roads have caused an increase in fugitive dust resulting in depressed plant conditions along the roadways. Particulate matter from

the spoils and pits increases as the velocity of the wind increases. The winds in the study area average approximately 9 miles per hour.

BIOLOGICAL IMPACTS

Alterations of the natural habitats for various native species of plants, aquatic life, and animals are inevitable in uranium mining areas. In these areas, toxic elements such as selenium may accumulate in plants which may be used as toxic element indicators (Rosenfeld and Beath, 1964). Selenium indicators such as asters (Aster adscendens Lindl.) and vetch (Astragalus racemosus Purch.) were identified by the author within the study area possibly indicating the migration of toxic elements.

The potential for vegetative climax on mine sites is not equivalent to the adjacent land. At best, 25 percent of the disturbed lands have vegetation returning to normal after 25 years. Most of the returning vegetation is in the form of noxious weeds and sages. The vegetation in the disturbed areas is not equivalent to adjacent land in terms of kinds or numbers of species of plants.

Game and animal populations are noticeably less in the study area than in the Jewel Cave quadrangles to the north or the Hot Springs quadrangle to the east. This is possibly a result of man-made disturbances and roads as a result of

past mining activity, giving hunters access to the area, but probably is only due to the lack of moisture and food supporting wildlife and vegetation in the area.

Microclimates in the study area have been changed by sedimentation and chemical leaching from runoff, however, more habitats have been created by the mining activity than have been destroyed. Rocks, brush piles, and depressions, in which water may be stored, have all created habitats that are utilized by many species of rodents and small game. The increase in small game has resulted in an increase in populations of birds of prey.

LAND USE

Past mining activity in the study area has caused an increase in the recreational land use in the area. The number of roads on USFS property from mining activity has brought many people into the area. The increase in the number of people using the area also increases the exposure to potential hazards.

There are no water or recreational facilities within the study area to accommodate the increased recreational use.

The use of rangeland and cropland has not significantly been reduced because of mining in the study area.

CONCLUSIONS

The purpose of this study has been two-fold (1) to determine the location, volume, and radiological status of all known uranium spoils and sites of mining disturbance in the southern Black Hills, and (2) to assess the present and future impacts associated with these spoils.

The location of 38 uranium mines covering greater than 490 acres (198 ha) were plotted on orthophotoquad maps and 7½ minute quadrangle maps. The volume of spoils within the study area is estimated by the author to be greater than 390,000 cubic yards (298,165 m³).

Attempts have been made to determine the radiological status within the study area. There have been no known reported illnesses in the Edgemont area, such as cancer, as a result of mining activities. However, during the early 1950's, the connection between respiratory illness and radon gas may not have been realized. Therefore, if any illness resulted, it probably would not have been reported.

Possible dangers from radioactivity within the study area would be those classified by Morrison (1980). These dangers include: (1) radiation effects by inhalation of radon-222 and its short half-life daughters; (2) external exposure to gamma rays, and (3) radiation effects by injection of radio-nuclides.

The first of these dangers was evaluated using Track Etch

devices which measure the alpha radiation given off by the short half-life daughters of radon-222 gas. Results shown in Table 7 indicate that all the mines are above the .33 WL limit of occupational exposure, however, most people visiting the mine would not stay for an extended period of time. Therefore, an exposure limit of 1.0 WL was used by the author as approximate limit for occasional visitors. The Matias Peak, Blue Chip, and Darrow adits were the only adits below this limit.

The Hot Point Group and the Greenacre adits have noticeably higher WL's. This may possibly be due to a lack of circulation within the adits or possibly as a result of a higher concentration of radium-226 which would create an inequilibrium in the radon gas present. These values are probably isolated occurrences within the adits of the study area.

The author concludes from these results that there are possible hazards from the inhalation and ingestion of radon-222 and its short half-life daughters within the adits of the study area.

An evaluation of the second risk proposed by Morrison (1980) includes a radiometric survey which measures external exposure of gamma rays and spoils sampling for radium-226.

Results from the radiometric survey (Table 5) indicate that most of the spoils within the survey area are radioactive, however, large standard deviations indicate that the highest readings are from isolated locations within the disturbed areas.

Results from spoils sampling for radium-226 also seem to indicate a wide range of variability of radioactivity. Only four of the 15 spoils sampled were within the limit set by the author of 100 pCi/g, however, it must be noted that these samples were taken from isolated locations within the mines.

It is concluded that dangers from external exposure to gamma rays within the study area are minimal to the occasional visitor. However, it should be noted that the potential hazard is directly proportional to the amount of time spent within the mine sites. Therefore, a potential hazard exists from external exposure to gamma rays from uranium spoils especially with long term exposure.

Uranium is present in trace or minor amounts in all ground water. The solubility of many uranium compounds in water is high enough to suggest that several ppm could occur in solution. Radioactivity levels in ground water within the study area are listed in Table 8. Actual amounts of natural uranium-238 in the study area vary from 0.08 $\mu\text{g/L}$ to 0.87 $\mu\text{g/L}$ (TVA, 1979). The maximum permissible concentration of uranium is well above the maximum value reported by TVA. Therefore, possible hazards from ingestion of the ground waters within the study area are considered to be minimal.

Uranium is also found in small amounts in vegetation within the study area and is not considered to be hazardous. It should be noted, however, that selenium indicator plants

were found in several sites and may possibly indicate migration of toxic elements by diffusion (Rosenfeld and Beath, 1964).

Many adverse environmental impacts and physical hazards were also found within the study area. These include: (1) disturbed areas of up to 200 acres (81 ha); (2) unplugged drill holes; (3) numerous dozer scrapes, roads, and trenches; (4) stressed vegetation conditions; (5) open pits with loose edges; (6) extreme erosional features; (7) structurally unstable adits; (8) unmarked ventilation shafts, and (9) mine refuse.

RECOMMENDATIONS BASED ON CONCLUSIONS

It is the author's opinion that it is time to renew America's faith in the mining industry by correcting the mistakes of the past. A major problem seems to be one of avoidance whereby neither the United States government or the mining industry wants to accept the responsibility for corrective action. If these mistakes are not corrected, radical groups will have fuel to fight pro-mining legislation and the net loss of income as a result will be far greater than the cost of corrective action.

The U.S. Forest Service should not solely be responsible for corrective action. The U.S. Department of Energy and the NRC should work with congress for the appropriation of reclamation and clean-up funds.

There are three major functions of reclamation of the mines in the study area: (1) to stabilize erosion; (2) to improve esthetic appearance; (3) to eliminate possible hazards in the area. The problem lies in to what extent "complete" land reclamation should be accomplished. Minimum recommendations for the area studies include:

- (1) close all adits
- (2) place security fencing around all open pits
- (3) post all potentially hazardous areas
- (4) reseed disturbed areas with native plant species
- (5) consult health physicist to set exposure limits for occasional visitors

The closure of all the adits would eliminate the possibility of excessive radon gas exposure. The physical hazard caused by adits with dangerous conditions would also be eliminated. Closure could either be permanent by the use of explosives, or temporary by security fencing.

Table 10 lists the species and rates of seeding recommended by TVA (1979). The species listed are adapted to climatic and soil conditions existing in the study area. These species may be used by grazing animals for food.

Drill seeding is to be used where possible. If slopes are too steep for drill equipment, other acceptable methods such as hydroseeding or aerial seeding could be used. Some areas may have to be seeded by hand (TVA, 1979). Ponderosa pine may also be planted in many of the disturbed areas.

A vegetation monitoring program to measure progress of re-seeding should be implemented. Pictures could be taken and the upgrading of vegetation could be done every two years.

These recommendations will substantially reduce potential hazards, reduce erosion, increase stability of slopes, and improve the esthetic appearance of the mine sites in the study area.

To facilitate the growing number of recreational vehicles

<u>Species</u>	<u>Ordinary Uplands</u>	<u>Heavy Soils Depressions</u>	<u>Sandy Soils</u>	<u>Wet or Subirrigated Areas</u>
<u>Agropyron smithii</u>	4(4.5)	6(6.7)		4(4.5)
Rosana				
<u>Agropyron dasystachyum</u>	3(3.4)	3(3.4)		
Critana				
<u>Agropyron riparium</u>		2(2.2)	3(3.4)	3(3.4)
Sodar				
<u>Bouteloua curtipendula</u>	2(2.2)			
Pierre or Butte				
<u>Calamovilfa longifolia</u>			1(1.1)	
<u>Schizachyrium scoparium</u>	2(2.2)	2(2.2)	2(2.2)	
Blaze				
<u>Oryzopsis hymenoides</u>			3(3.4)	
<u>Stipa viridula</u>			2(2.2)	
Lodonn				
<u>Agropyron elongatum</u>				4(4.5)
Alkar or Orbit				
<u>Astragalus cicer</u>				3(3.4)
<u>Atriplex canescens**</u>			2(2.2)	

**Add to mixture if a palatable shrub is desired by landowner.

Table 11 - Recommended Seeding Rates of Pure Live Seed in Kg/ha (1 lb/acre) For Edgemont Uranium Mining District (from TVA, 1979).

in the area, a recreational picnic ground could be built. It has also been suggested that many of the individual mine roads be permanently closed to allow the land to revert back to its original condition.

A significant impact of the mining activities in the study area is the detrimental effect to the image of uranium mining in general. Environmental groups, such as the Black Hills Alliance, point to the present conditions of the uranium mines left behind by past mining practices, and fear that the Black Hills will become a "national sacrifice area" if mining is continued. These fears may never change unless the mistakes of the past are corrected.

These recommendations have been put forth as a minimum solution to the problems created by mistakes of the past. America suffers due to a deteriorating image of mining. Responsibilities must be accepted for the condition of these abandoned mines before this image can be improved. To do nothing would be the greatest mistake of all.

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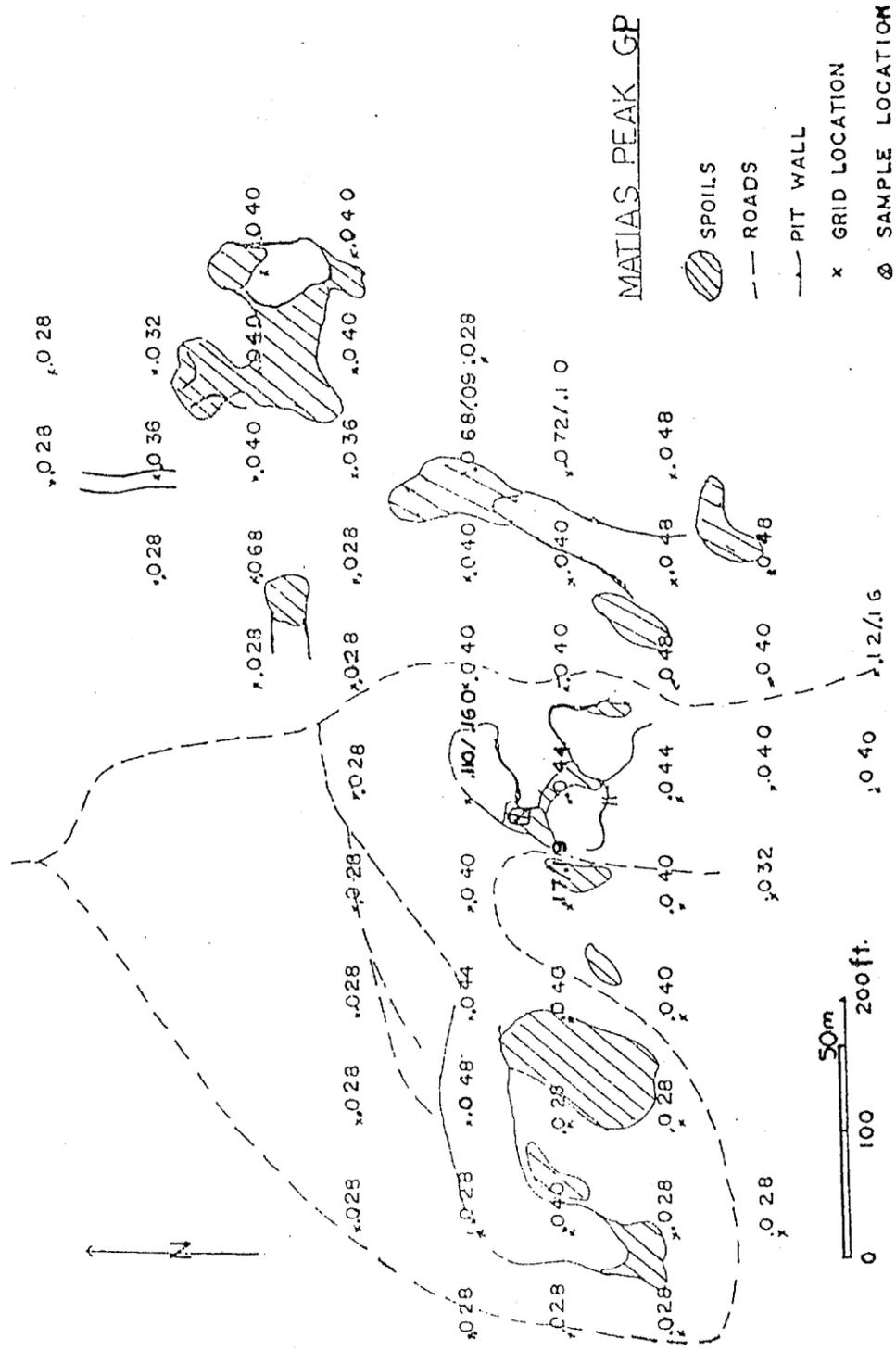
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APPENDIX A
Radiologic Maps
and
Spoils Testing Results

PAGE

MINE NAME

A-1	Matias Peak Group Map
A-2	Matias Peak Group Sampling Results
A-3	Mary Jack Group Map
A-4	Mary Jack Group Sampling Results
A-5	Lion No. 1 and 4 Map
A-6	Lion No. 1 and 4 Map
A-7	Lion No. 1 and 4 Sampling Results
A-8	Too Late Map
A-9	Hold No. 15 Map
A-10	Hold No. 15 Map
A-11	Holdup Group Map
A-12	Hot Point Group Map
A-13	Hot Point Group Sampling Results
A-14	Greenacre Map
A-15	Greenacre Sampling Results
A-16	Hay and Fay Map
A-17	Hay and Fay Sampling Results
A-18	Clarabelle Map
A-19	Shamrock Map
A-20	Shamrock Sampling Results
A-21	Dagmar Map
A-22	Gertrude Map
A-23	Gertrude Sampling Results
A-24	Pictograph Mesa Map
A-25	King Map
A-26	King Sampling Results
A-27	King Sampling Results
A-28	Verde Map
A-29	Verde Sampling Results
A-30	Verde Map
A-31	Trail Faction Map
A-32	Blue Chip Map
A-33	Blue Chip Map
A-34	Blue Chip Map
A-35	Blue Chip Map
A-36	Ridge Runner Map
A-37	Ridge Runner Sampling Results
A-38	Taylor Group Map
A-39	Get Me Rick Map
A-40	Get Me Rick Sampling Results
A-41	Virginia C Map
A-42	Virginia C Sampling Results
A-43	Coal Canyon Group Map
A-44	Coal Canyon Sampling Results



RADIOMETRIC MAP (in mR/hr)

WILSON & FIELD

$^{226}\text{Radium}$ in Soil

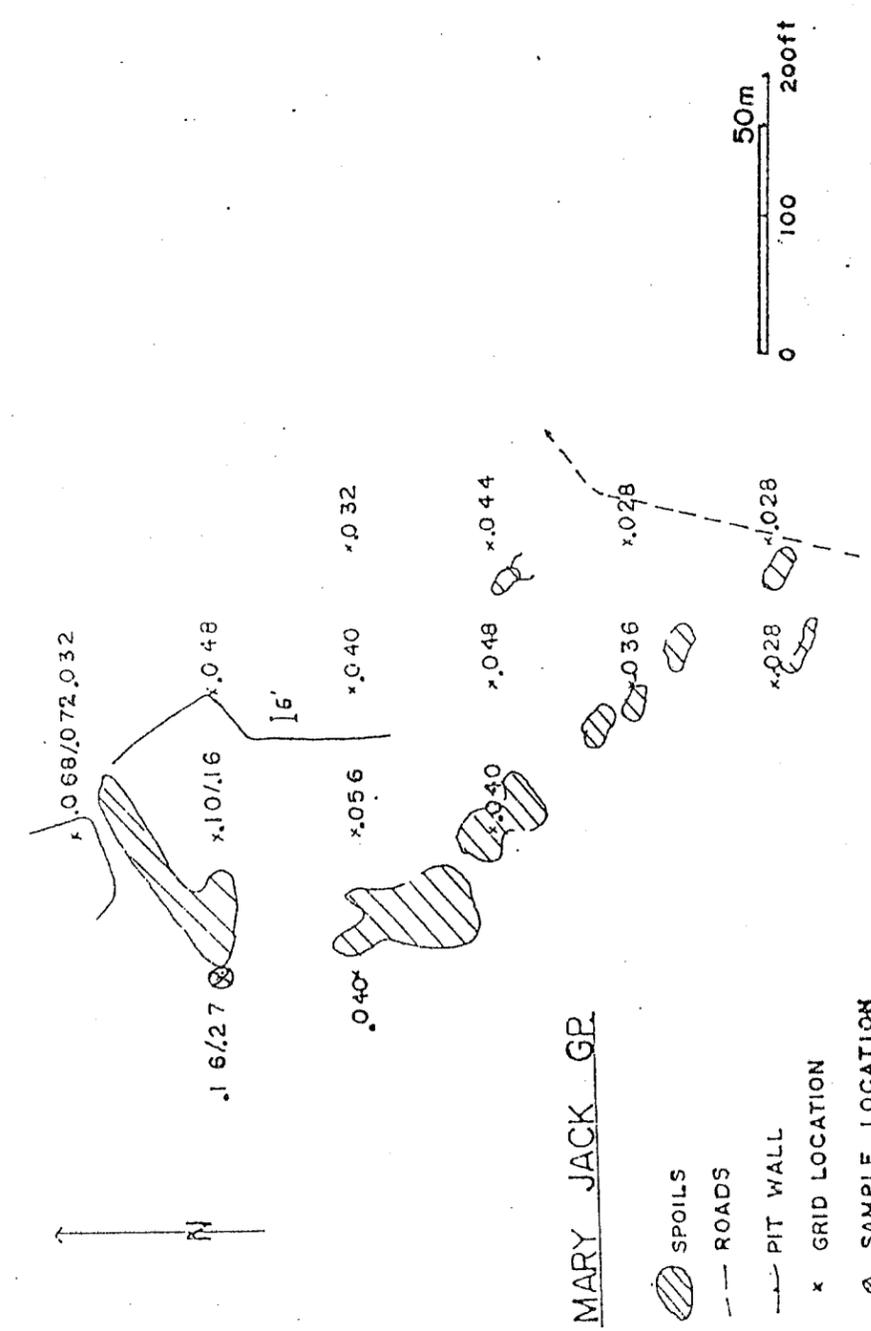
MATIAS PEAK

Sample No. Mine 1

Date Collected _____

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TES & LEAH

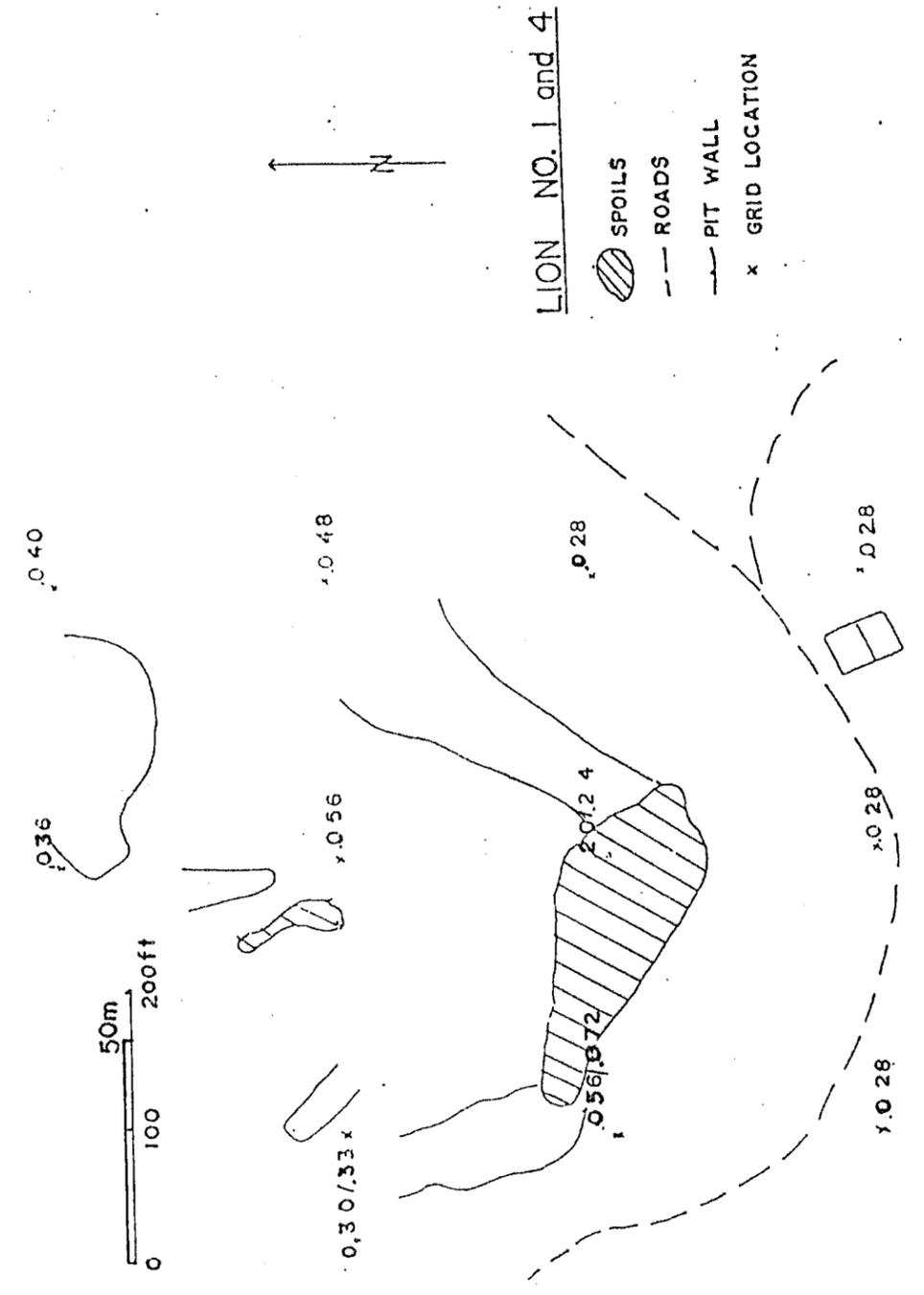


RADIOMETRIC MAP (in mR/hr)

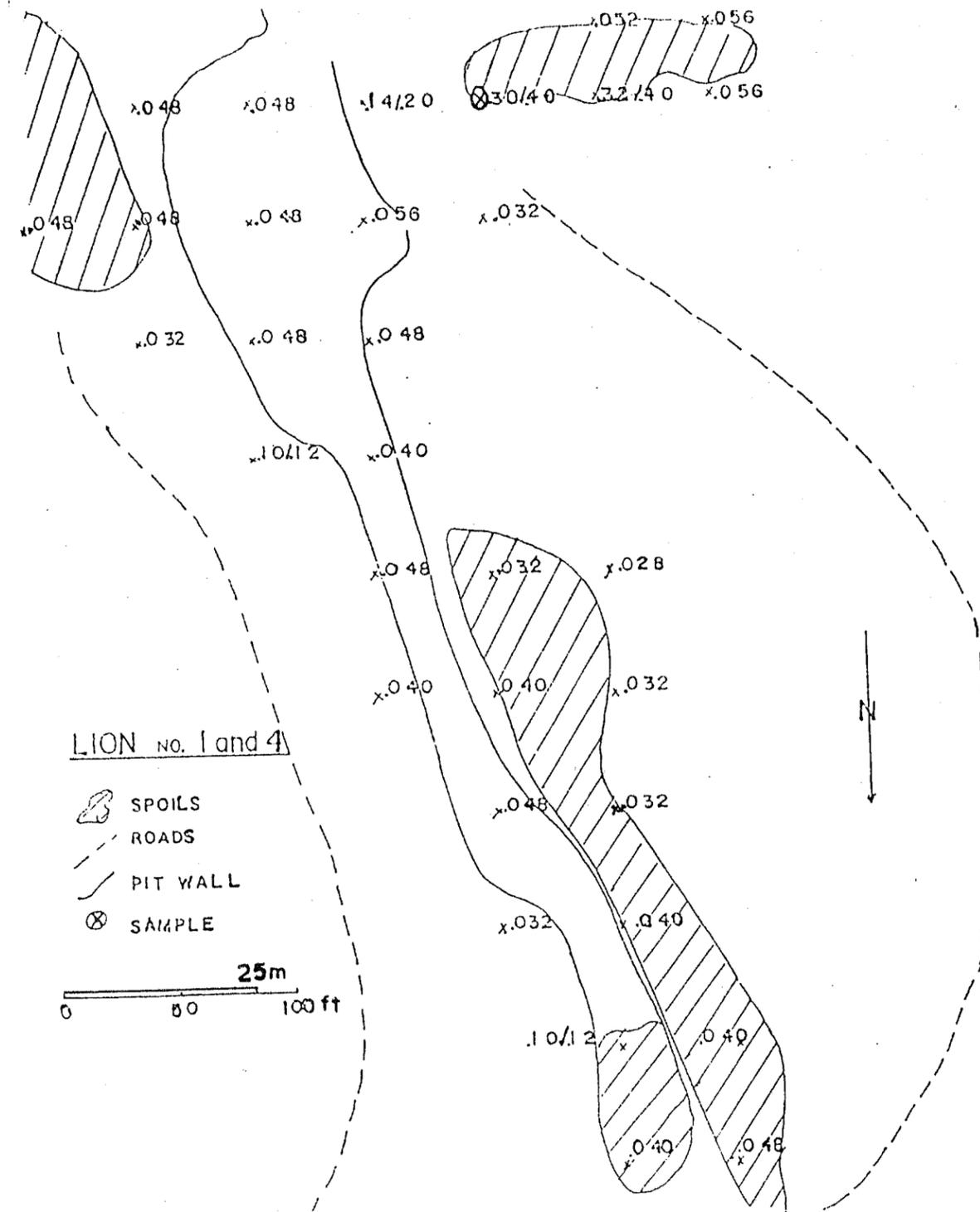
²²⁶Radium in SoilMARY JACKSample No. Mine 2

Date Collected _____

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RADIOMETRIC MAP (in mR/hr)



RADIOMETRIC MAP (in mR/hr)

725-8-1107

725-8-1107

$^{226}\text{Radium}$ in Soil

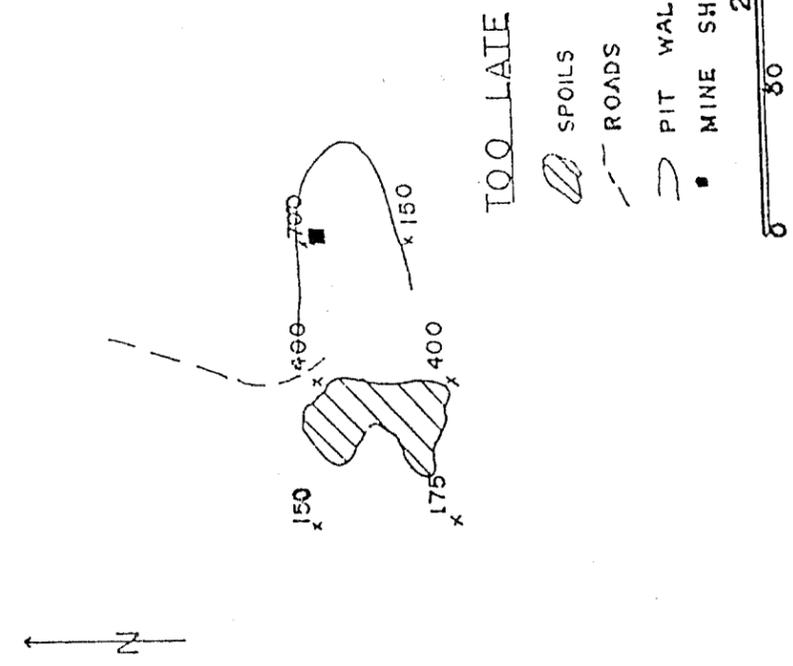
Lion #1 & 4

Sample No. Mine 3

Date Collected _____

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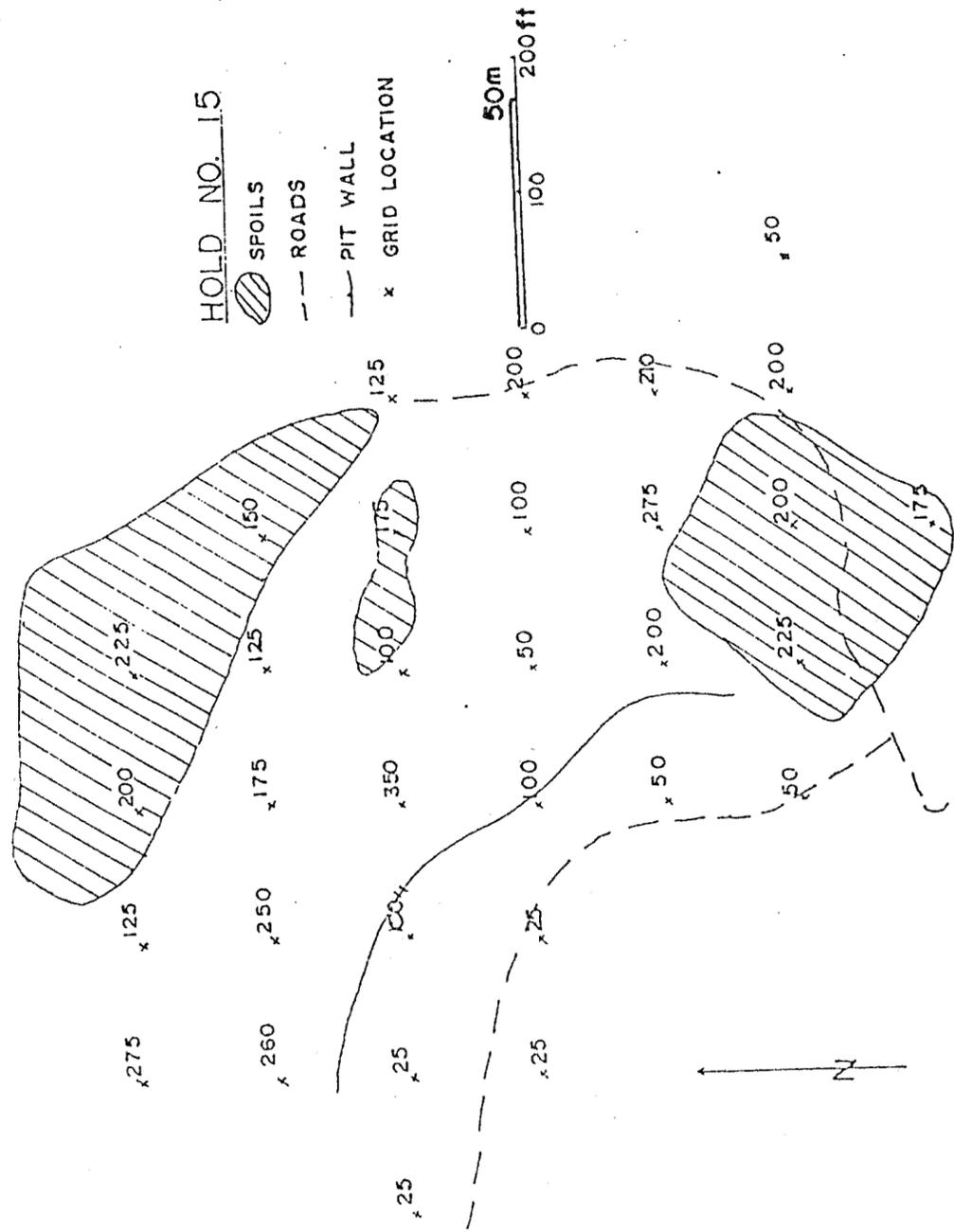
RES & TECH



RADIOMETRIC MAP (in counts per minute)

RES & TECH 80-5701

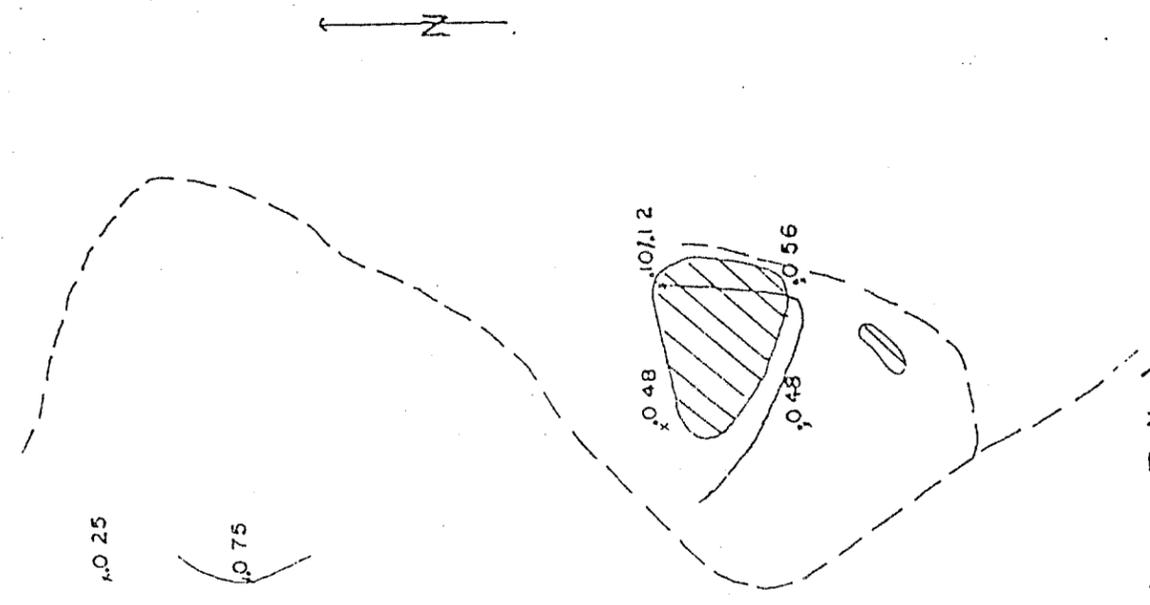
RECS & TECH



RADIOMETRIC MAP (in counts per minute)

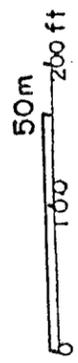
210 014 00 5770

RES & TECH

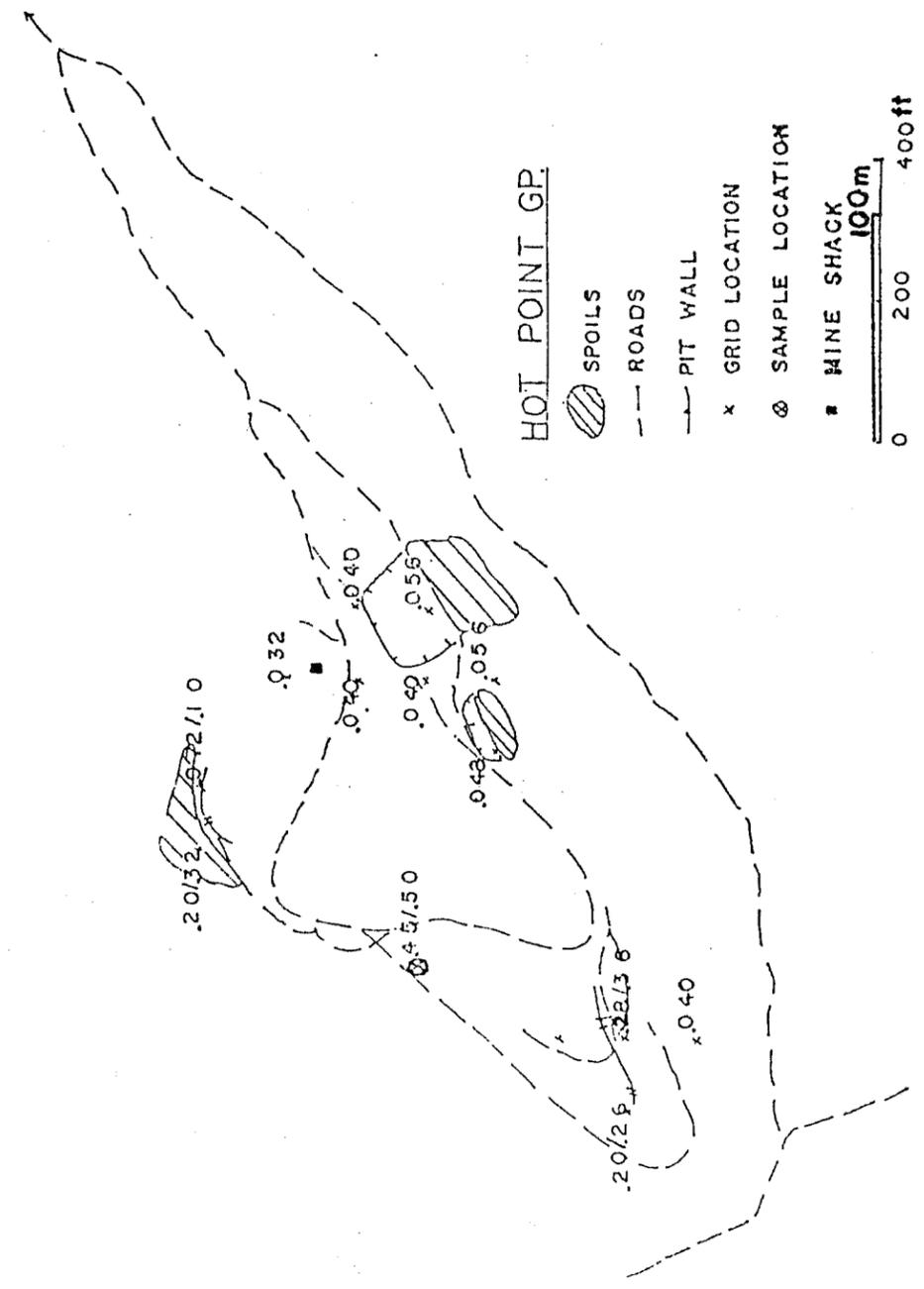


HOLDUP GP.

-  SPOILS
-  ROADS
-  PIT WALL
-  GRID LOCATION



RADIOMETRIC MAP (in mR/hr)

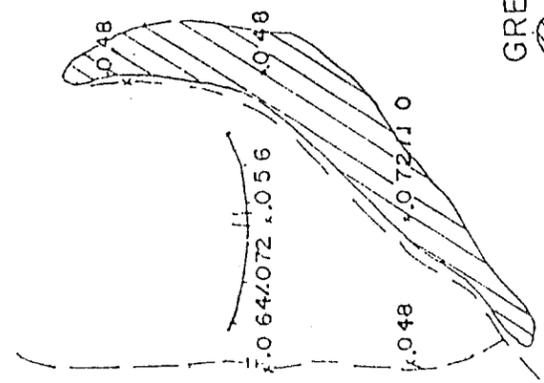
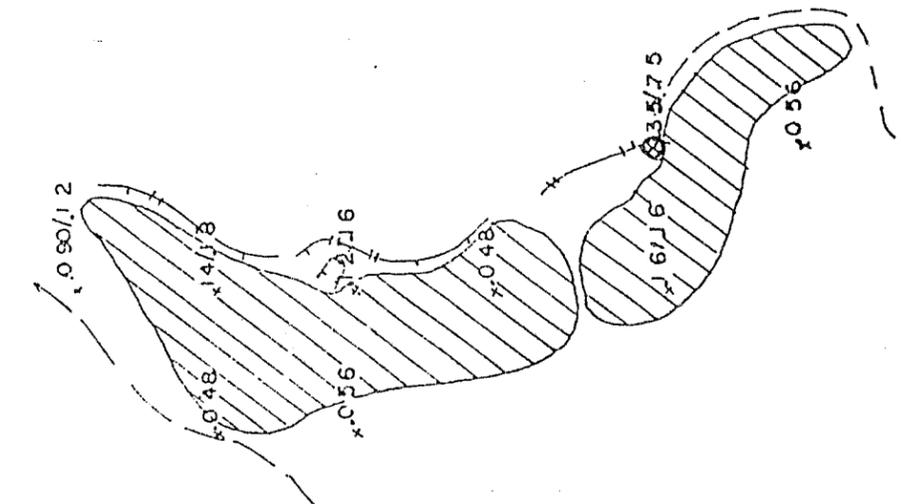


RADIOMETRIC MAP (in mR/hr)

²²⁶Radium in SoilHOT POINTSample No. Mine 9

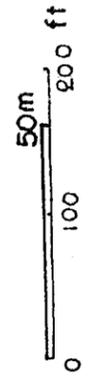
Date Collected _____

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GREENACRE

- ▨ SPOILS
- - - ROADS
- - - PIT WALL
- x GRID LOCATION
- ⊗ SAMPLE LOCATION



RADIOMETRIC MAP (in mR/hr)

ES & HED

ES & HED

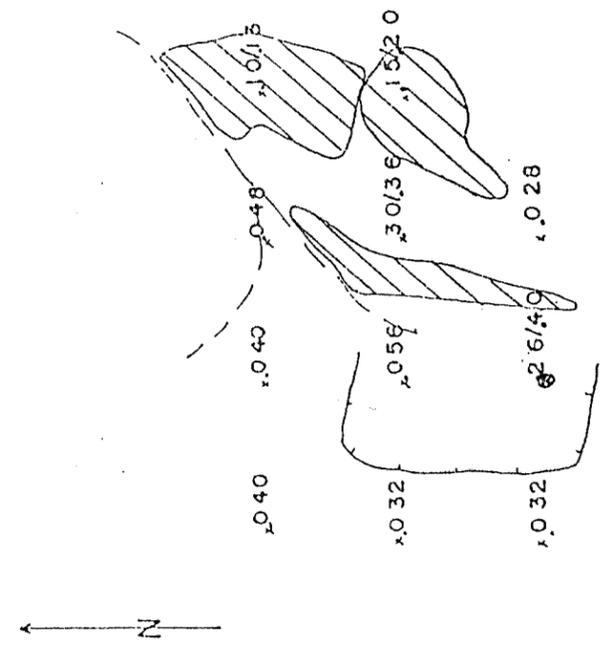
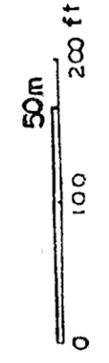
²²⁶Radium in SoilGREENACRESample No. Mine 10

Date Collected _____

INPUT(Computer Location)---STOTotal Count/Minute ²²⁶Ra \lesssim_{81}^{116} 425,838 /10 min. = 42,583.8 (10)Background Count/Minute distilled H₂O 2561 /10 min. = 256.1 (11)Disintegrations/Count factor..... 2.59 (12)Sample Weight >600 gm. (13)Count Time 15 hrs. (14)Seal Time 18 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 13 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ⁴⁰K \lesssim_{67}^{77} 172,941 17,294.1 (22)Background Count/Minute ⁴⁰K \lesssim_{67}^{77} 1503 150.3 (23)OUTPUTNet Count/Minute 42,356Net Disintegrations (Net Count x D/C per min.) 109,705Uncorrected ²²⁶Ra Concentration (D/min/gm.)... 182.8Ingrowth Time (T) 37.88 days1-e^(-λΔT)(-ΔT + 3.823)9994Corrected ²²⁶Ra Concentration <182.9 pCi/gm.

HAY and FAY

-  SPOILS
-  ROADS
-  PIT WALL
-  GRID LOCATION
-  SAMPLE LOCATION

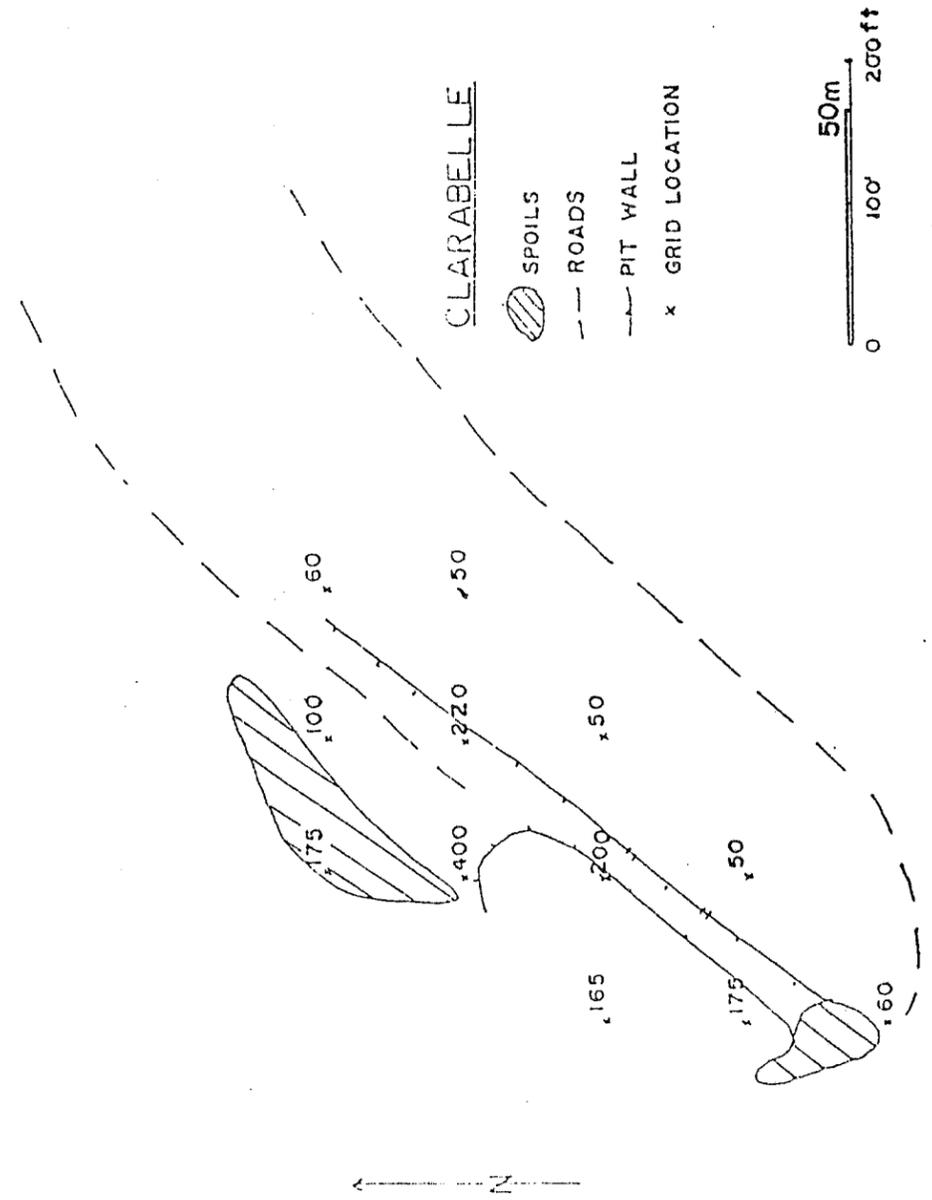


RADIOMETRIC MAP (in mR/hr)

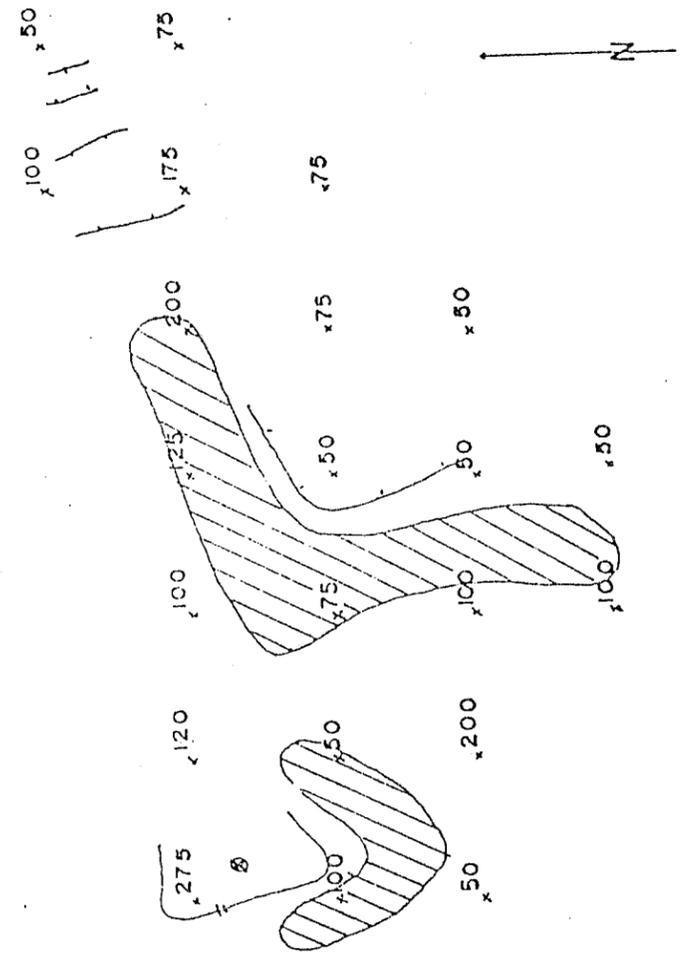
²²⁶Radium in SoilHAY & FAYSample No. Mine 12

Date Collected _____

(Computer Location)---STOINPUTTotal Count/Minute ²²⁶Ra $\begin{matrix} \leq 116 \\ \leq 81 \end{matrix}$ 615,010 /10 min. = 61501.1 (10)Background Count/Minute distilled H₂O 2561 /10 min. = 256.1 (11)Disintegrations/Count factor..... 2.59 (12)Sample Weight >600 gm. (13)Count Time 15 hrs. (14)Seal Time 18 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 13 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ⁴⁰K $\begin{matrix} \leq 77 \\ \leq 67 \end{matrix}$ 246,085 24,608.5 (22)Background Count/Minute ⁴⁰K $\begin{matrix} \leq 77 \\ \leq 67 \end{matrix}$ 1503 150.3 (23)OUTPUTNet Count/Minute 61,306Net Disintegrations (Net Count x D/C per min.) 158,784Uncorrected ²²⁶Ra Concentration (D/min/gm.)... 264.6Ingrowth Time (T) 37.88 days1-e^(-λΔT)(-ΔT + 3.823)9995Corrected ²²⁶Ra Concentration < 264.8 pCi/gm.

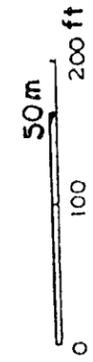


RADIOMETRIC MAP (in counts per minute)



SHAMROCK

-  SPOILS
-  ROADS
-  PIT WALL
-  GRID LOCATION
-  SAMPLE LOCATION



RADIOMETRIC MAP (in counts per minute)

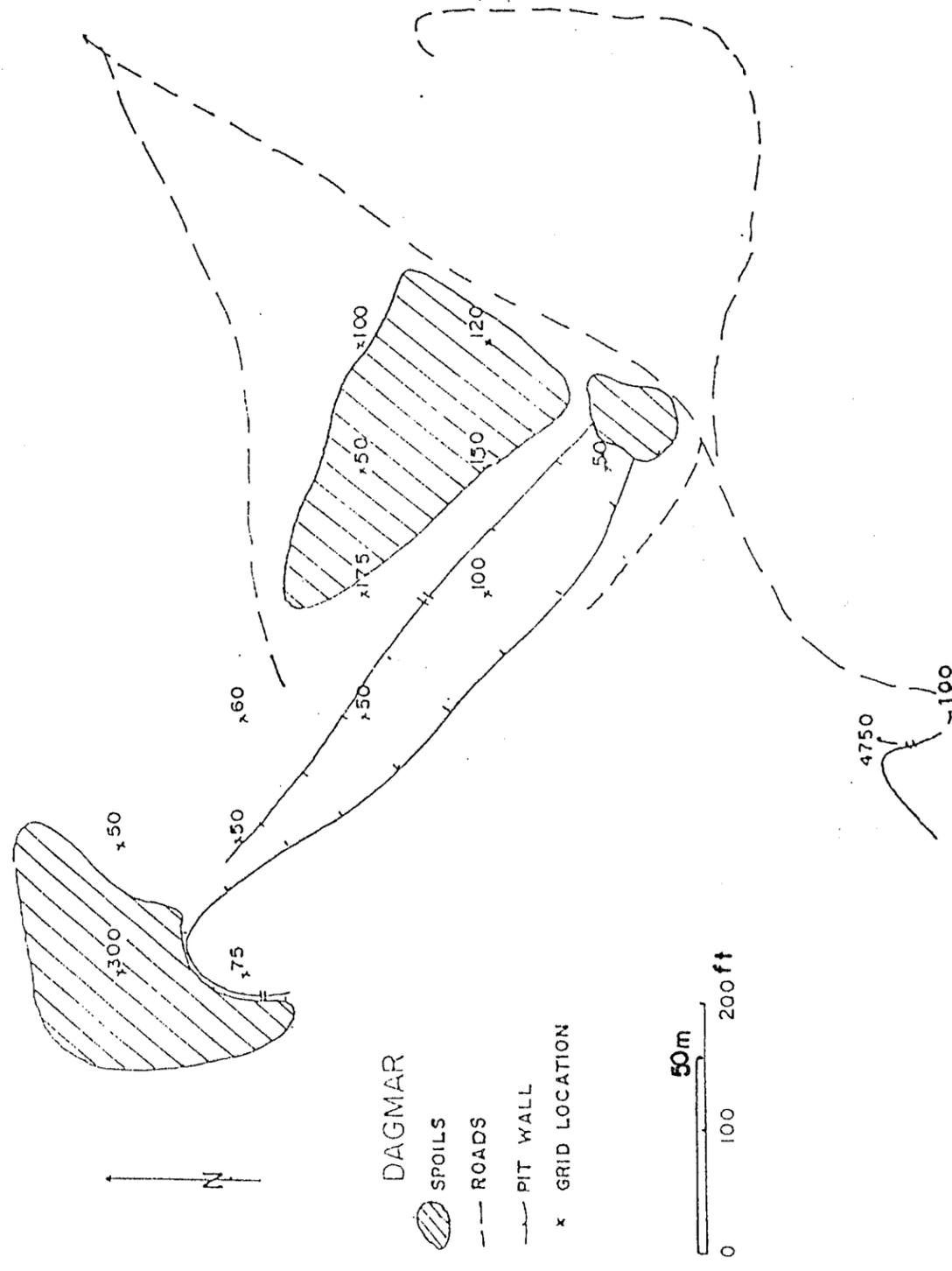
SHAMROCK
COUNTS PER MINUTE

$^{226}\text{Radium}$ in SoilSample No. SHAMROCK
Mine 15

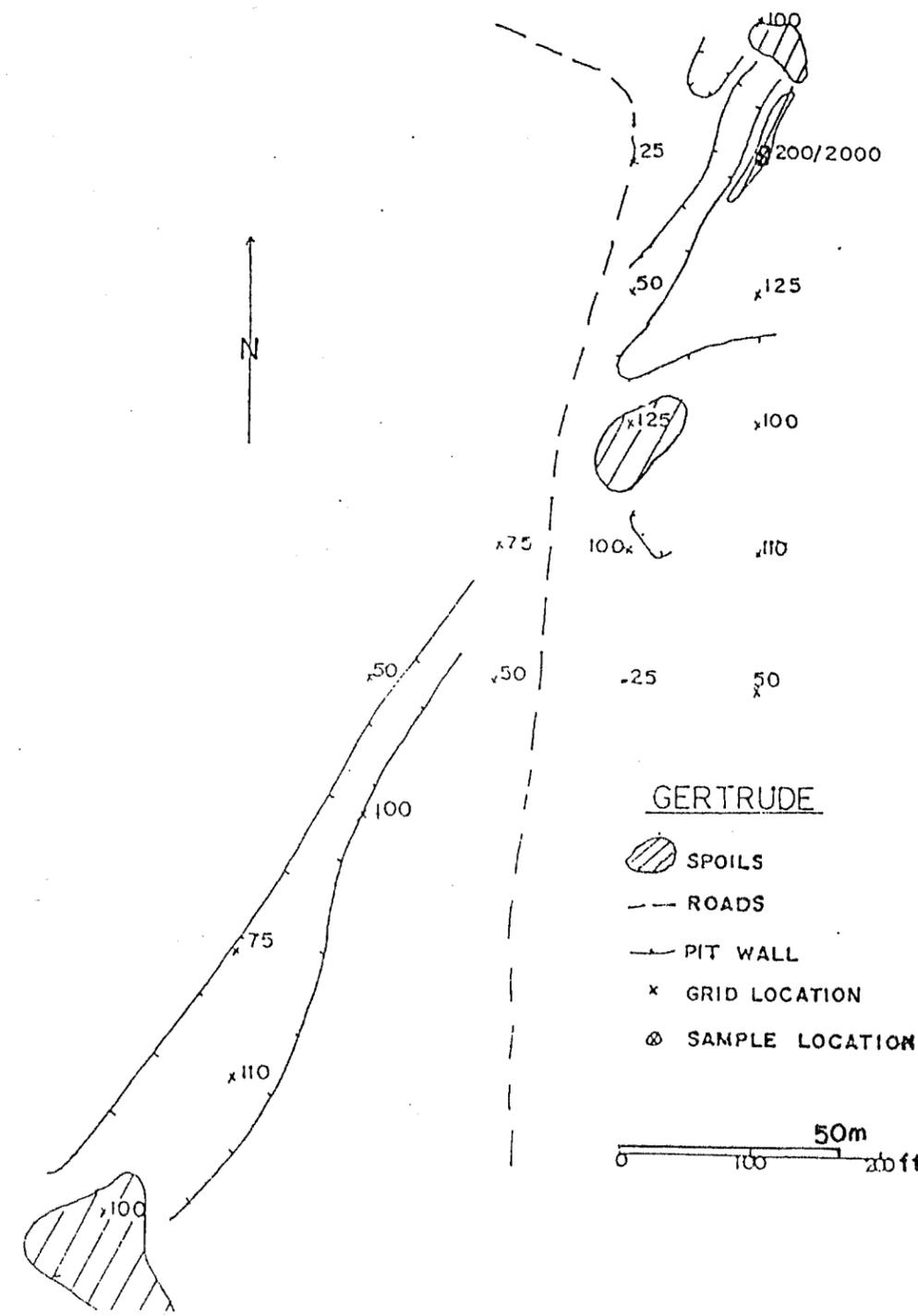
Date Collected _____

INPUT(Computer Location)---STOTotal Count/Minute ^{226}Ra $\begin{matrix} \leq 116 \\ 81 \end{matrix}$ 333,652 /10 min. = 33,652 (10)Background Count/Minute distilled H_2O 2117 /10 min. = 211.7 (11)Disintegrations/Count factor..... 2.62 (12)Sample Weight >600 gm. (13)Count Time 17 hrs. (14)Seal Time 18 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 17 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ^{40}K $\begin{matrix} \leq 77 \\ 67 \end{matrix}$ 138,140 13,814.0 (22)Background Count/Minute ^{40}K $\begin{matrix} \leq 77 \\ 67 \end{matrix}$ 1241 124.1 (23)OUTPUTNet Count/Minute 33162.Net Disintegrations (Net Count x D/C per min.) 86884.Uncorrected ^{226}Ra Concentration (D/min/gm.)... 144.8Ingrowth Time (T) 41.96 days $1 - e^{-\lambda \Delta T}$ ($-\Delta T \div 3.823$)9998Corrected ^{226}Ra Concentration 144.8 pCi/gm.

SEC 8 HIGH
DD FORM 100 57701



RADIOMETRIC MAP (in counts per minute)



RADIOMETRIC MAP (in counts per minute)

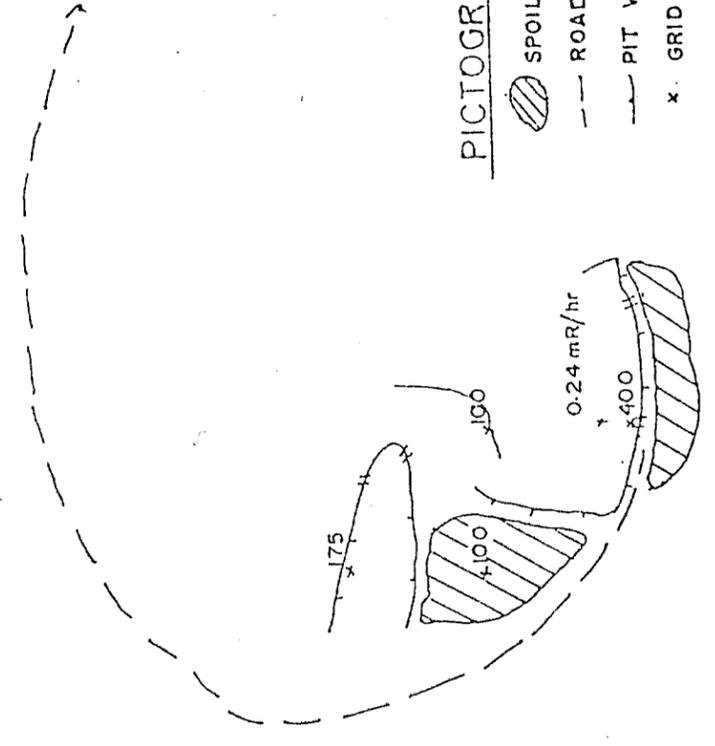
NO. 117 / CO. 17701

²²⁶Radium in SoilSample No. GERTRUDE
Mine 17

Date Collected _____

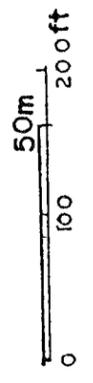
(Computer Location)---STOINPUTTotal Count/Minute ²²⁶Ra \sum_{81}^{116} 2,461,261 / 10 min. = 246,126.1 (10)Background Count/Minute distilled H₂O 2117 / 10 min. = 211.7 (11)Disintegrations/Count factor..... 2.62 (12)Sample Weight >600 gm. (13)Count Time 17 hrs. (14)Seal Time 18 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 17 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ⁴⁰K \sum_{67}^{77} 985078 98507.8 (22)Background Count/Minute ⁴⁰K \sum_{67}^{77} 1241 124.1 (23)OUTPUTNet Count/Minute 246152Net Disintegrations (Net Count x D/C per min.) 644919Uncorrected ²²⁶Ra Concentration (D/min/gm.)... 1075Ingrowth Time (T) 41.96 days1-e^(-λΔT) (-ΔT + 3.823)9998Corrected ²²⁶Ra Concentration 1075. pCi/gm.

SAFETY X-1160
SANDR CITY CO. 57701

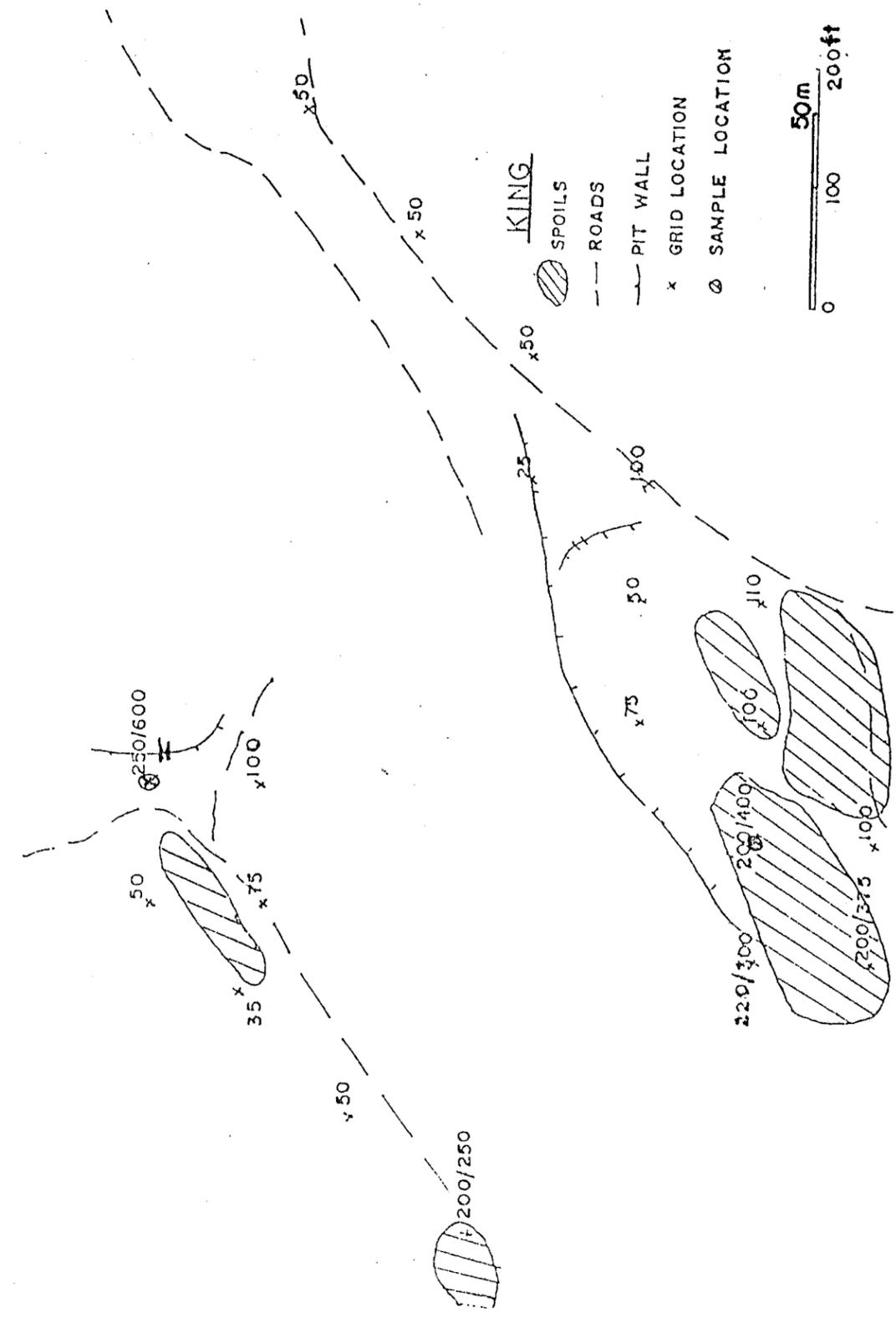


PICTOGRAPH MESA

-  SPOILS
-  ROADS
-  PIT WALL
-  GRID LOCATION



RADIOMETRIC MAP (in counts per minute)



RADIOMETRIC MAP (in counts per minute)

57701

57701

$^{226}\text{Radium}$ in Soil

KING

Sample No. Mine 20

Date Collected _____

INPUT

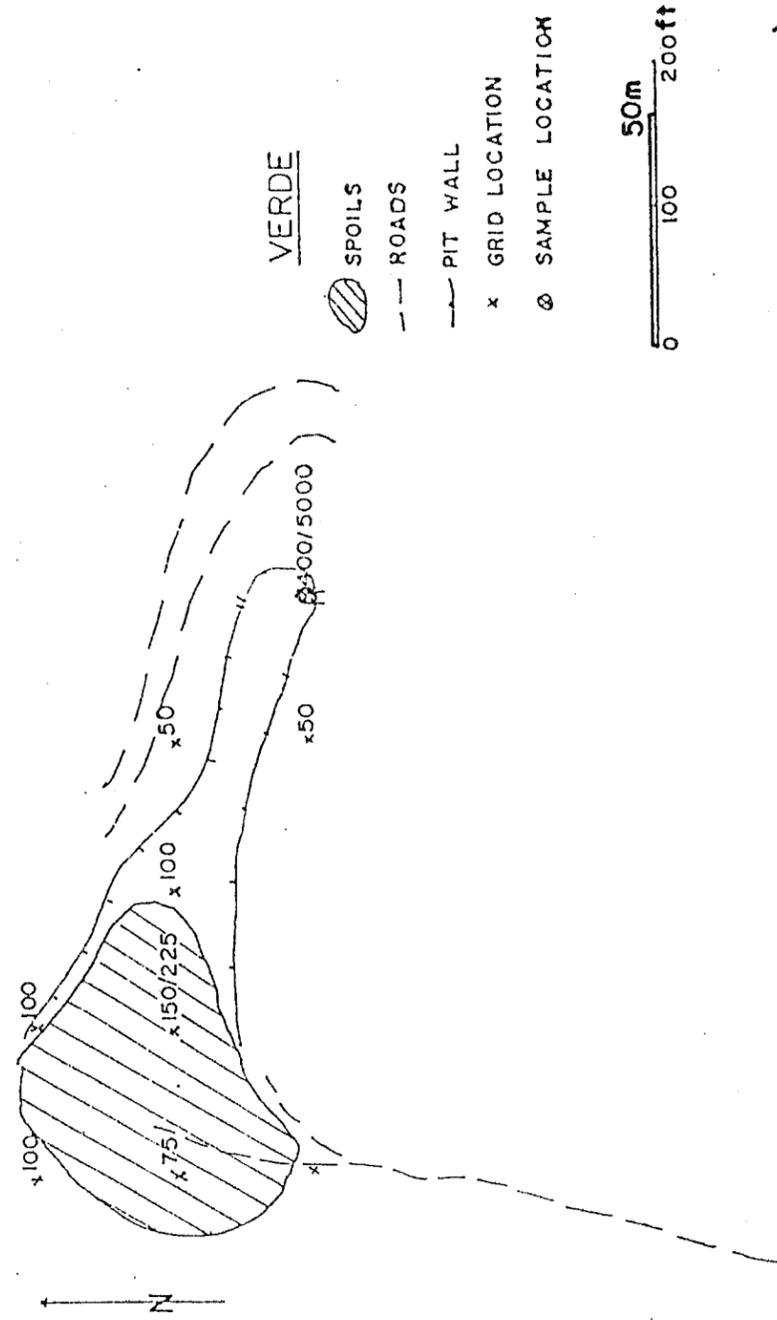
(Computer Location)---STO

Total Count/Minute ^{226}Ra \lesssim_{81}^{116} 225,372 /10 min. = 22,537.2 (10)Background Count/Minute distilled H_2O 2117 /10 min. = 211.7 (11)Disintegrations/Count factor..... 2.62 (12)Sample Weight >600 gm. (13)Count Time 17 hrs. (14)Seal Time 17.5 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 17 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ^{40}K \lesssim_{67}^{77} 92098 9209.8 (22)Background Count/Minute ^{40}K \lesssim_{67}^{77} 1241 124.1 (23)OUTPUTNet Count/Minute 22,339.Net Disintegrations (Net Count x D/C per min.) 58,527.Uncorrected ^{226}Ra Concentration (D/min/gm.)... 97.54Ingrowth Time (T) 41.96 days $1 - e^{-\lambda \Delta T}$ ($-\Delta T + 3.823$)9998Corrected ^{226}Ra Concentration 97.57 pCi/gm.

²²⁶Radium in SoilKINGSample No. Mine 20.5

Date Collected _____

INPUT(Computer Location)---STOTotal Count/Minute ²²⁶Ra $\begin{matrix} \leq 116 \\ 81 \end{matrix}$ 289,507 /10 min. = 28950.7 (10)Background Count/Minute distilled H₂O 2066 /10 min. = 206.6 (11)Disintegrations/Count factor..... 2.64 (12)Sample Weight >600 gm. (13)Count Time 15 hrs. (14)Seal Time 18 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 16 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ⁴⁰K $\begin{matrix} \leq 77 \\ 67 \end{matrix}$ 120,616 12061.6 (22)Background Count/Minute ⁴⁰K $\begin{matrix} \leq 77 \\ 67 \end{matrix}$ 1278 127.8 (23)OUTPUTNet Count/Minute 28,747Net Disintegrations (Net Count x D/C per min.) 75,894Uncorrected ²²⁶Ra Concentration (D/min/gm.)... 126.5Ingrowth Time (T) 40.92 days1-e^(-λΔT)(-ΔT + 3.823)9997Corrected ²²⁶Ra Concentration 126.5 pCi/gm.



RADIOMETRIC MAP (in counts per minute)

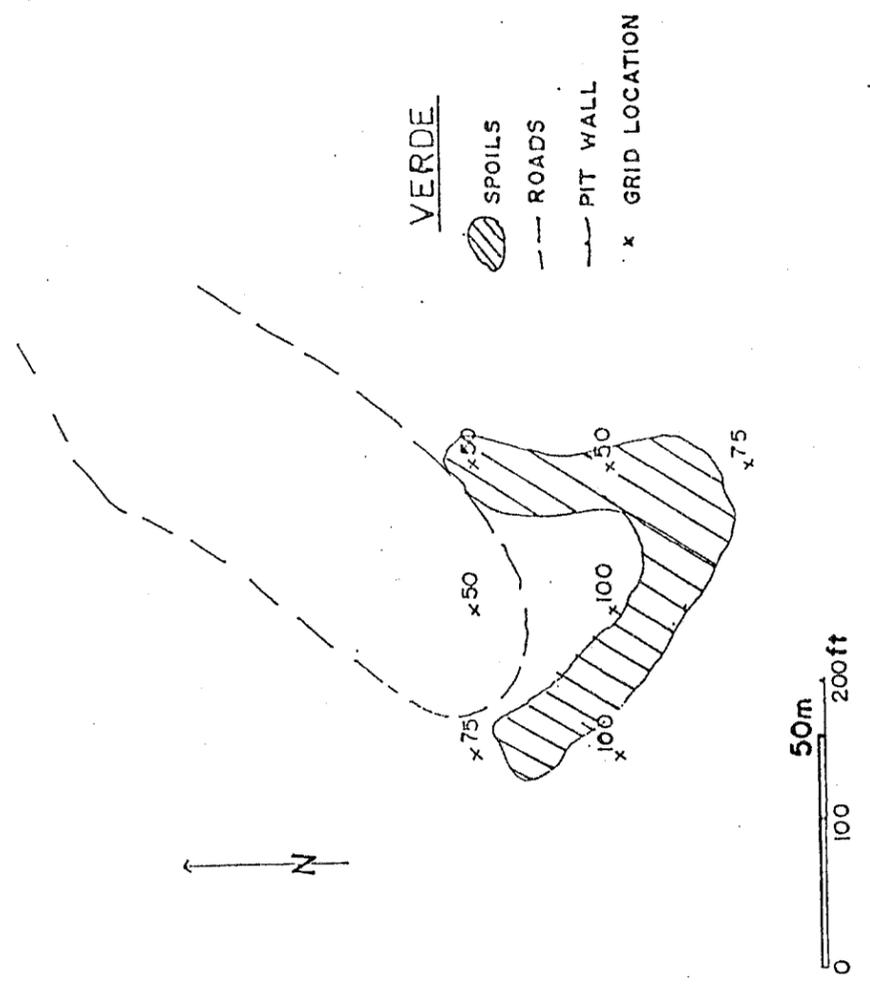
HILLS CO. ALL RIGHTS RESERVED

HILLS CO. ALL RIGHTS RESERVED

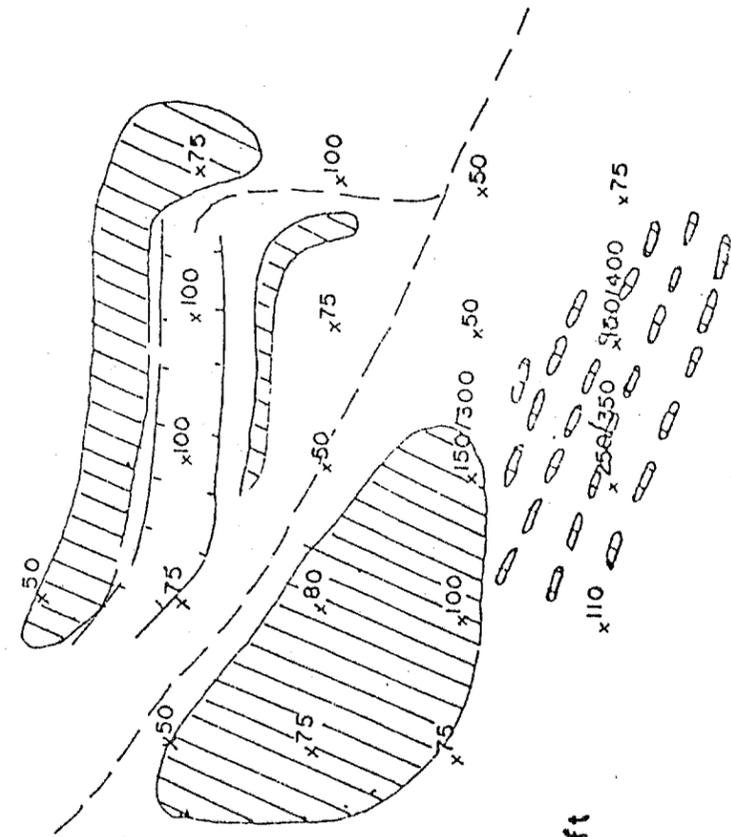
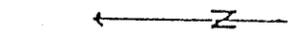
$^{226}\text{Radium in Soil}$ Sample No. VERDE
Mine 23

Date Collected _____

INPUT(Computer Location)---STOTotal Count/Minute ^{226}Ra $\begin{matrix} <116 \\ <81 \end{matrix}$ 1,408,599 / 10 min. = 140,859.9 (10)Background Count/Minute distilled H_2O 2117 / 10 min. = 211.7 (11)Disintegrations/Count factor..... 2.62 (12)Sample Weight 7600 gm. (13)Count Time 17 hrs. (14)Seal Time 18 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 17 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ^{40}K $\begin{matrix} <77 \\ <67 \end{matrix}$ 568045 56804.5 (22)Background Count/Minute ^{40}K $\begin{matrix} <77 \\ <67 \end{matrix}$ 1241 124.1 (23)OUTPUTNet Count/Minute 140761.Net Disintegrations (Net Count x D/C per min.) 368795.Uncorrected ^{226}Ra Concentration (D/min/gm.)... 614.7Ingrowth Time (T) 41.96 days $1 - e^{(-\lambda T)}$ ($-\lambda T + 3.823$)9998Corrected ^{226}Ra Concentration 614.8 pCi/gm.

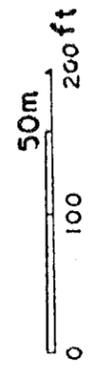


RADIOMETRIC MAP (in counts per minute)



TRAIL FACTION

SPOILS
 ROADS
 PIT WALL
 GRID LOCATION



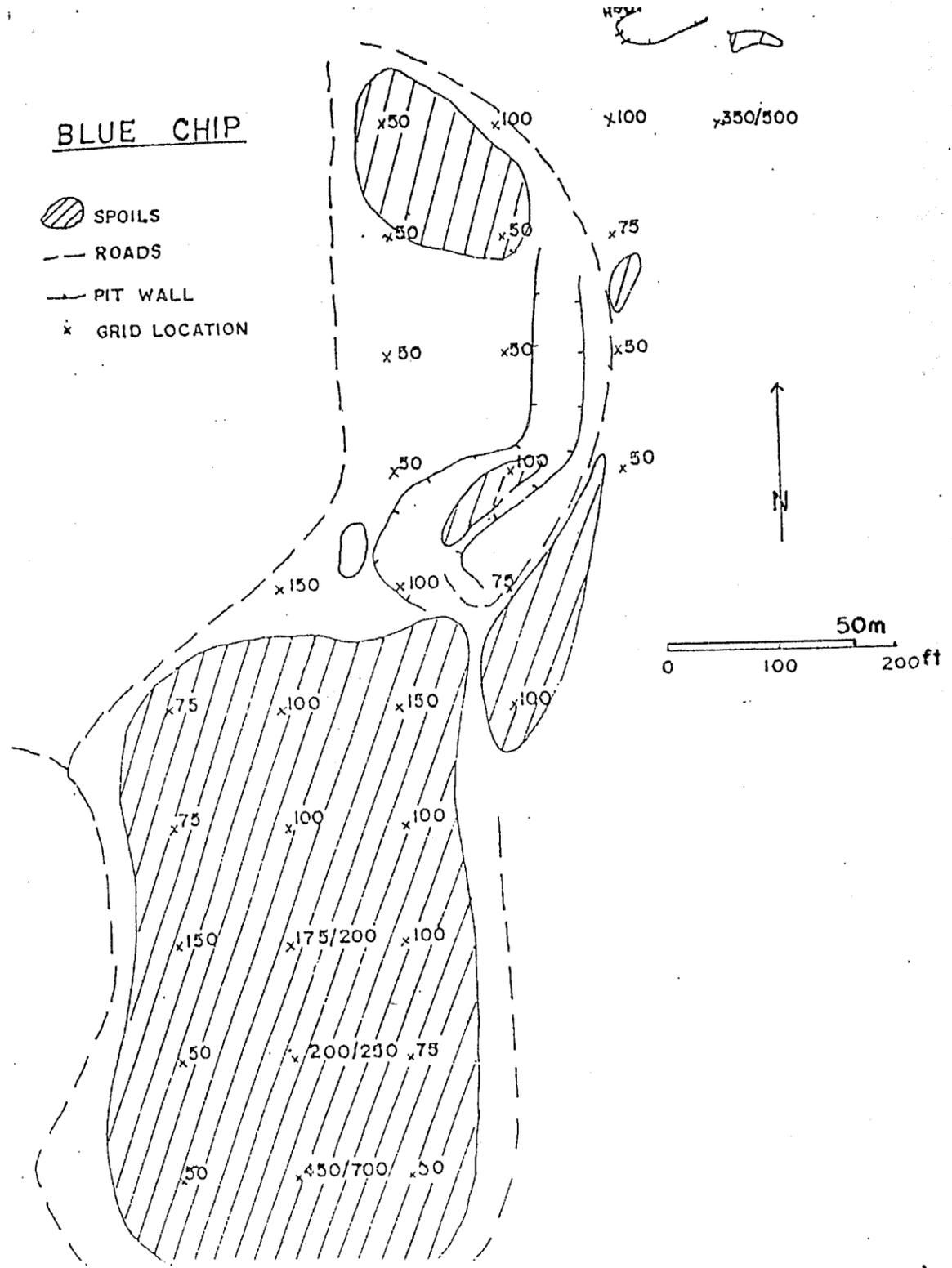
x 350/6500 x 475/2000 x 500/1500

RADIOMETRIC MAP (in counts per minute)

DAVID CITY SD 57701

BLUE CHIP

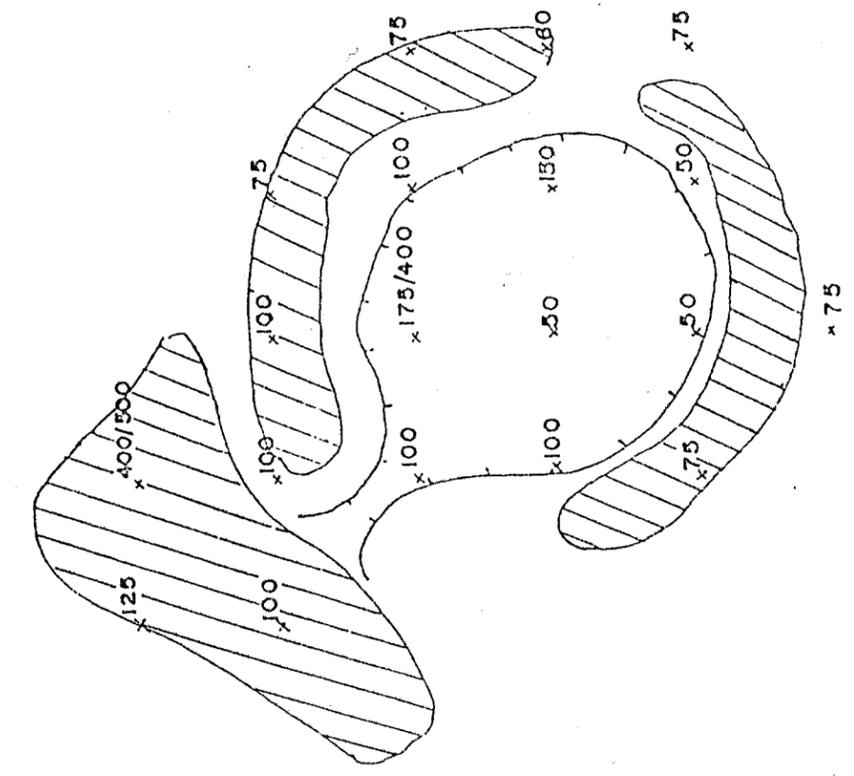
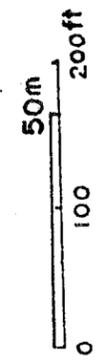
-  SPOILS
-  ROADS
-  PIT WALL
-  GRID LOCATION



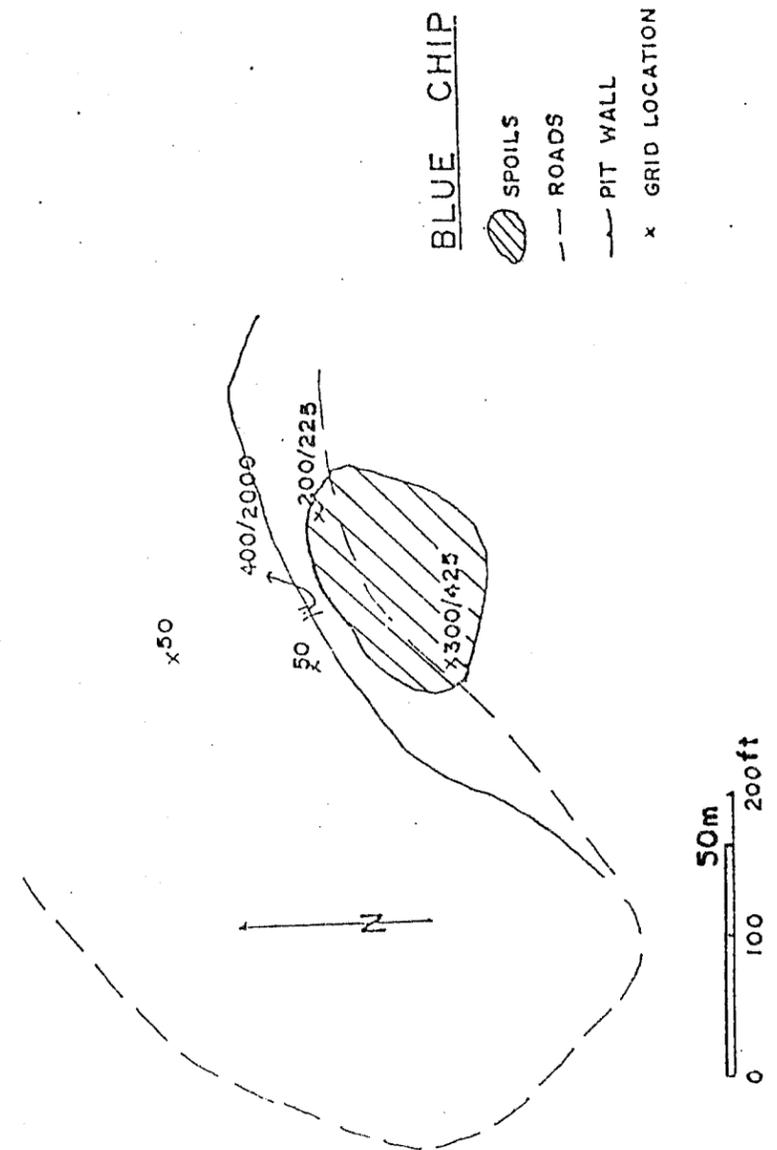
RADIOMETRIC MAP (in counts per minute)

BLUE CHIP

-  SPOILS
-  ROADS
-  PIT WALL
-  GRID LOCATION



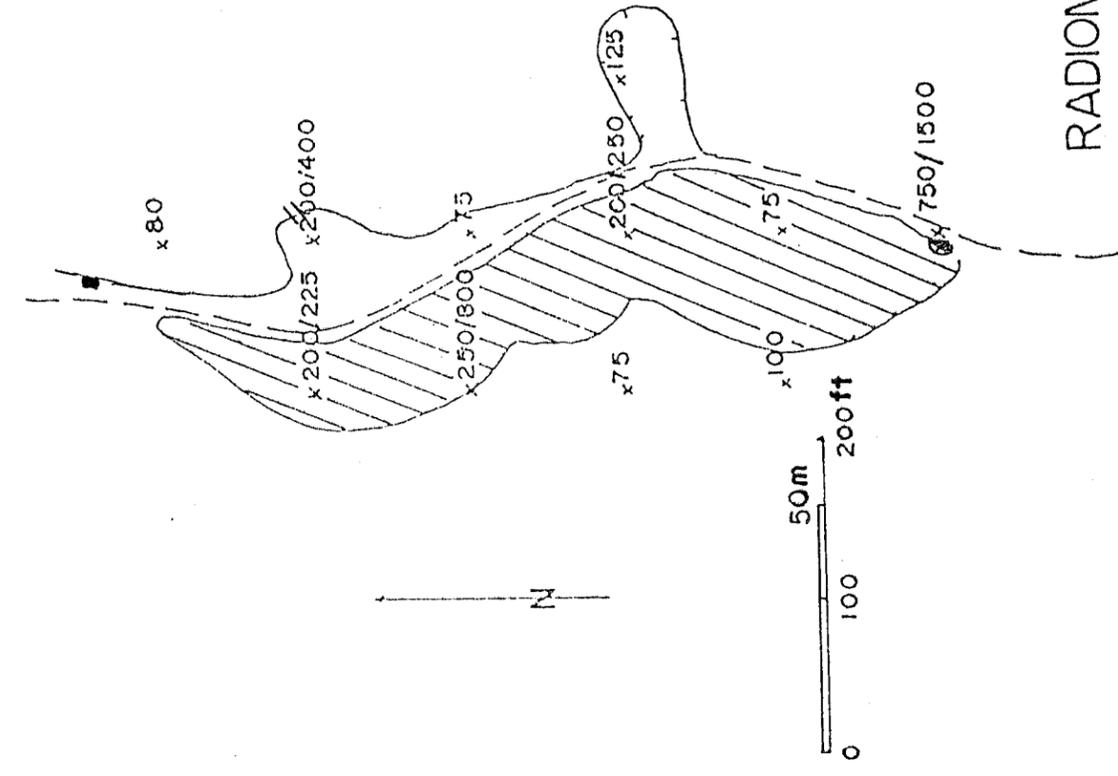
RADIOMETRIC MAP (in counts per minute)



RADIOMETRIC MAP (in counts per minute)

RIDGE RUNNER

-  SPOILS
-  ROADS
-  PIT WALL
-  GRID LOCATION
-  SAMPLE LOCATION
-  MINE SHACK

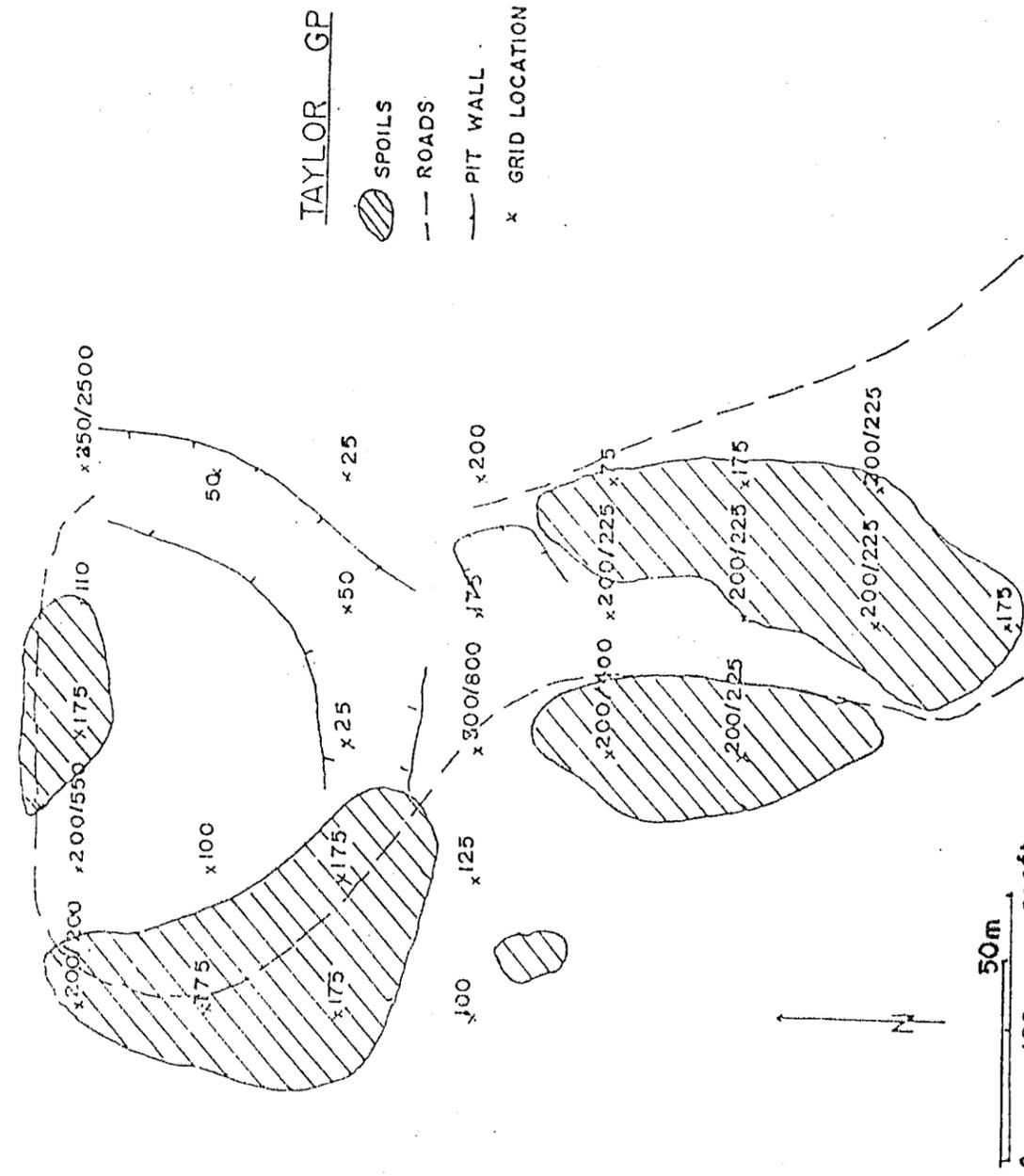


RADIOMETRIC MAP (in counts per minute)

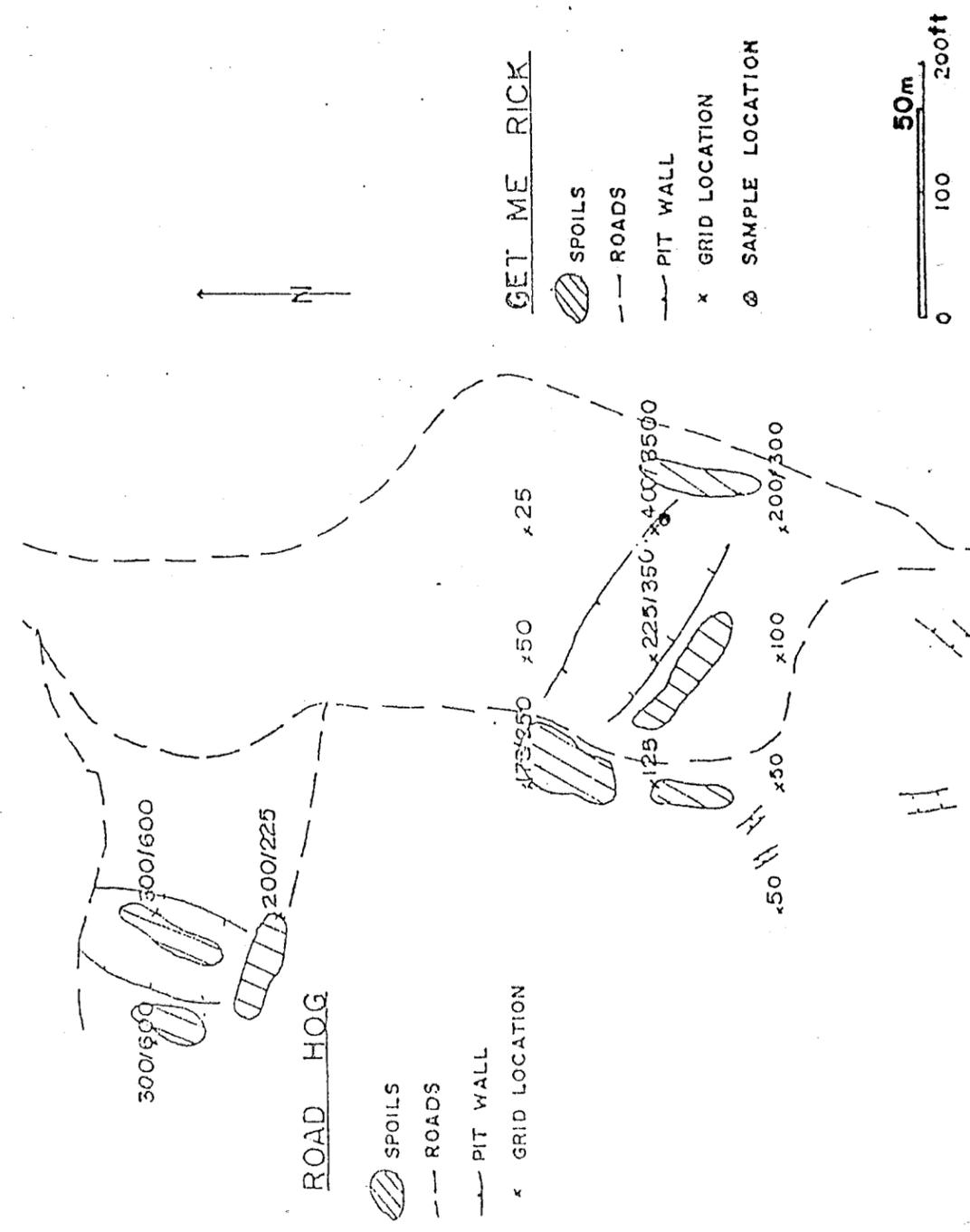
$^{226}\text{Radium in Soil}$ RIDGE RUNNERSample No. Mine 33

Date Collected _____

INPUT(Computer Location)---STOTotal Count/Minute ^{226}Ra $\begin{matrix} \swarrow 116 \\ \searrow 81 \end{matrix}$ 817,153 /10 min. = 81,715.3 (10)Background Count/Minute distilled H_2O 2561 /10 min. = 256.1 (11)Disintegrations/Count factor..... 2.59 (12)Sample Weight 592 gm. (13)Count Time 14 hrs. (14)Seal Time 17.5 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 13 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ^{40}K $\begin{matrix} \swarrow 77 \\ \searrow 67 \end{matrix}$ 292,402 29,240.2 (22)Background Count/Minute ^{40}K $\begin{matrix} \swarrow 77 \\ \searrow 67 \end{matrix}$ 1503 150.3 (23)OUTPUTNet Count/Minute 81,733Net Disintegrations (Net Count x D/C per min.) 211,690Uncorrected ^{226}Ra Concentration (D/min/gm.)... 357.6Ingrowth Time (T) 37.84 days $1 - e^{-\lambda \Delta T}$ (- ΔT + 3.823)9995Corrected ^{226}Ra Concentration 357.8 pCi/gm.



RADIOMETRIC MAP (in counts per minute)

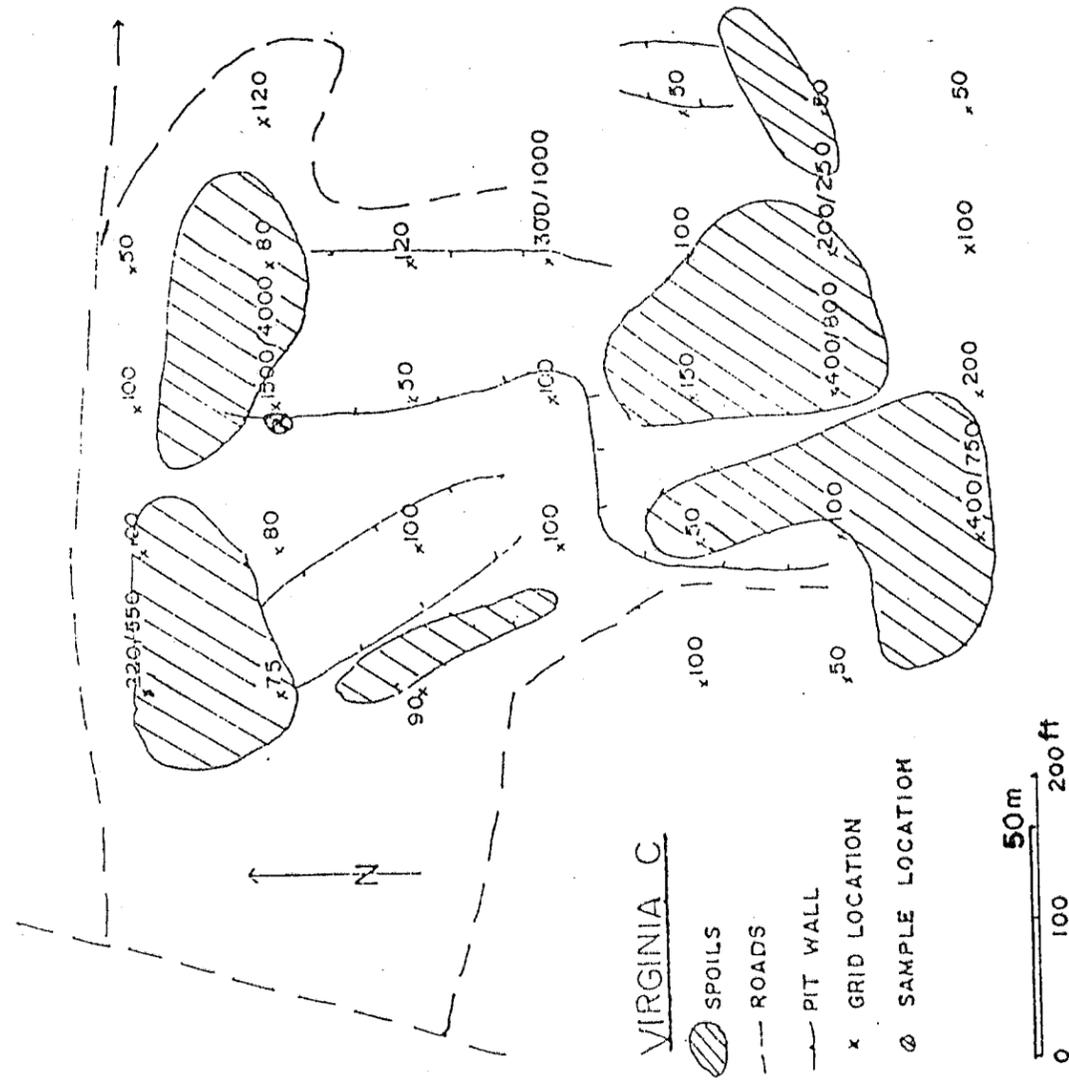


RADIOMETRIC MAP (in counts per minute)

$^{226}\text{Radium in Soil}$ GET ME RICKSample No. Mine 27

Date Collected _____

(Computer Location)---STOINPUTTotal Count/Minute ^{226}Ra $\begin{matrix} <116 \\ 81 \end{matrix}$ 713,017 /10 min. = 71,301.7 (10)Background Count/Minute distilled H_2O 2561 /10 min. = 256.1 (11)Disintegrations/Count factor..... 2.59 (12)Sample Weight 588 gm. (13)Count Time 15 hrs. (14)Seal Time 17.5 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 13 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ^{40}K $\begin{matrix} <77 \\ 67 \end{matrix}$ 280,478 28,047.8 (22)Background Count/Minute ^{40}K $\begin{matrix} <77 \\ 67 \end{matrix}$ 1503 150.3 (23)OUTPUTNet Count/Minute 71,144Net Disintegrations (Net Count x D/C per min.) 184,262Uncorrected ^{226}Ra Concentration (D/min/gm.)... 313.4Ingrowth Time (T) 37.88 days $1 - e^{-\lambda T}$ (- λT + 3.823)9995Corrected ^{226}Ra Concentration 313.5 pCi/gm.

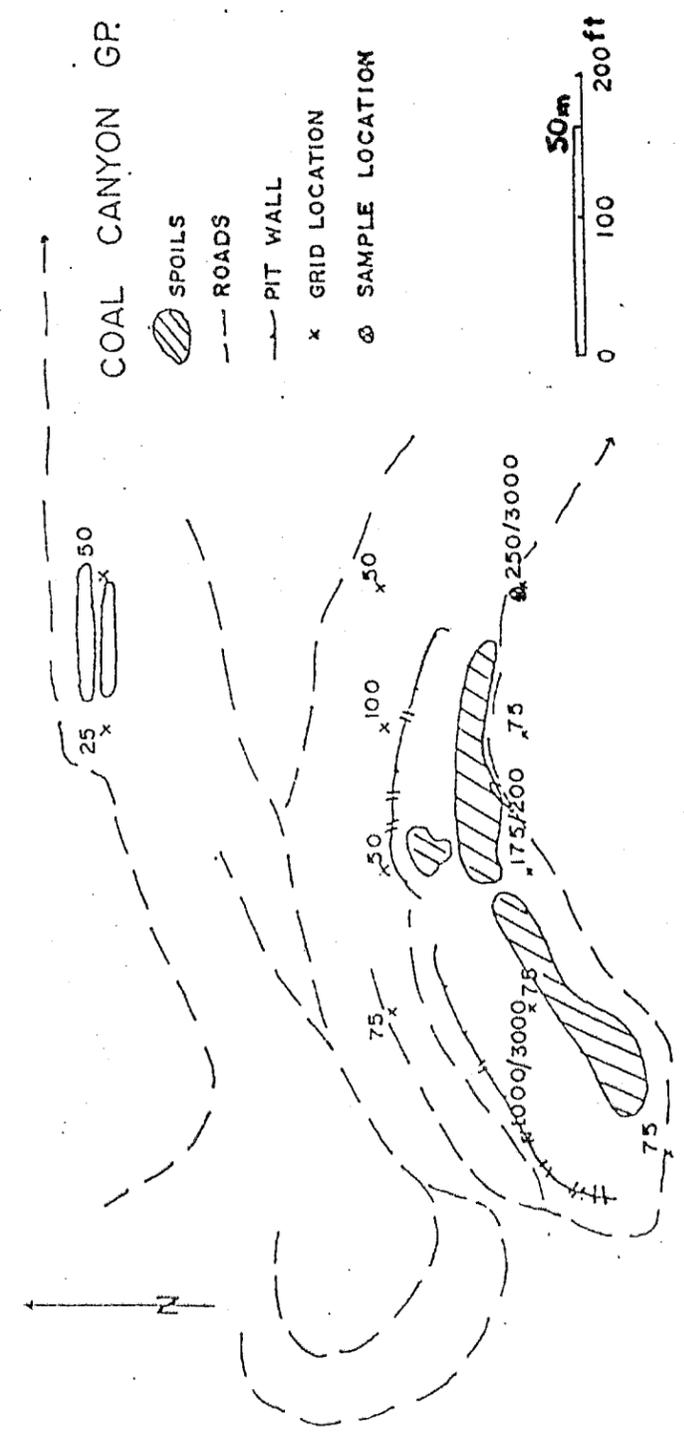


RADIOMETRIC MAP (in counts per minute)

$^{226}\text{Radium}$ in SoilVIRGINIA C
Sample No. Mine 25

Date Collected _____

INPUT(Computer Location)---STOTotal Count/Minute ^{226}Ra $\begin{matrix} <116 \\ 81 \end{matrix}$ 3,723,485 /10 min. = 372,348.5 (10)Background Count/Minute distilled H_2O 2561 /10 min. = 256.1 (11)Disintegrations/Count factor..... 2.59 (12)Sample Weight 588 gm. (13)Count Time 15hrs. (14)Seal Time 18hrs. (15)Time Change correction factor 0 hr. (16)Count Date 13 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ^{40}K $\begin{matrix} <77 \\ 67 \end{matrix}$ 1442115 144,211.5 (22)Background Count/Minute ^{40}K $\begin{matrix} <77 \\ 67 \end{matrix}$ 1503 150.3 (23)OUTPUTNet Count/Minute 372720.Net Disintegrations (Net Count x D/C per min.) 965346.Uncorrected ^{226}Ra Concentration (D/min/gm.)... 1641.Ingrowth Time (T) 37.88 days $1 - e^{-\lambda T}$ (-AT + 3.823)9995Corrected ^{226}Ra Concentration 1643. pCi/gm.



RADIOMETRIC MAP (in counts per minute)

$^{226}\text{Radium}$ in Soil

COAL CANYON

Sample No. Mine 30

Date Collected _____

INPUT(Computer Location)---STOTotal Count/Minute ^{226}Ra \sum_{81}^{116} 1,408,759 /10 min. = 140,875.9 (10)Background Count/Minute distilled H_2O 2066 /10 min. = 206.6 (11)Disintegrations/Count factor..... 2.64 (12)Sample Weight >600 gm. (13)Count Time 16 hrs. (14)Seal Time 18 hrs. (15)Time Change correction factor 0 hr. (16)Count Date 16 (17)Elapsed Time addition factor 31 days (18)Seal Date 6 (19)Total Count/Minute ^{40}K \sum_{67}^{77} 555,803 55,580.3 (22)Background Count/Minute ^{40}K \sum_{67}^{77} 1278 127.8 (23)OUTPUTNet Count/Minute 140,851Net Disintegrations (Net Count x D/C per min.) 371,848Uncorrected ^{226}Ra Concentration (D/min/gm.)... 619.7Ingrowth Time (T) 40.92 days $1 - e^{-\lambda \Delta T}$ (- ΔT + 3.823)9997Corrected ^{226}Ra Concentration 619.9 pCi/gm.

VITA Rowland L. Hall
810 W. Blvd. N.
Rapid City, SD 57701
(605) 343-5583

Personal Background

Born: Chadron, Nebraska, November 15, 1952
Marital Status: Married, no children

Education

B.A. - (Earth Science & Biology) - Chadron State College
Chadron, Nebraska, 1980.

M.S. - (Geology) - South Dakota School of Mines and
Technology, Rapid City, South Dakota, 1982.

Honors

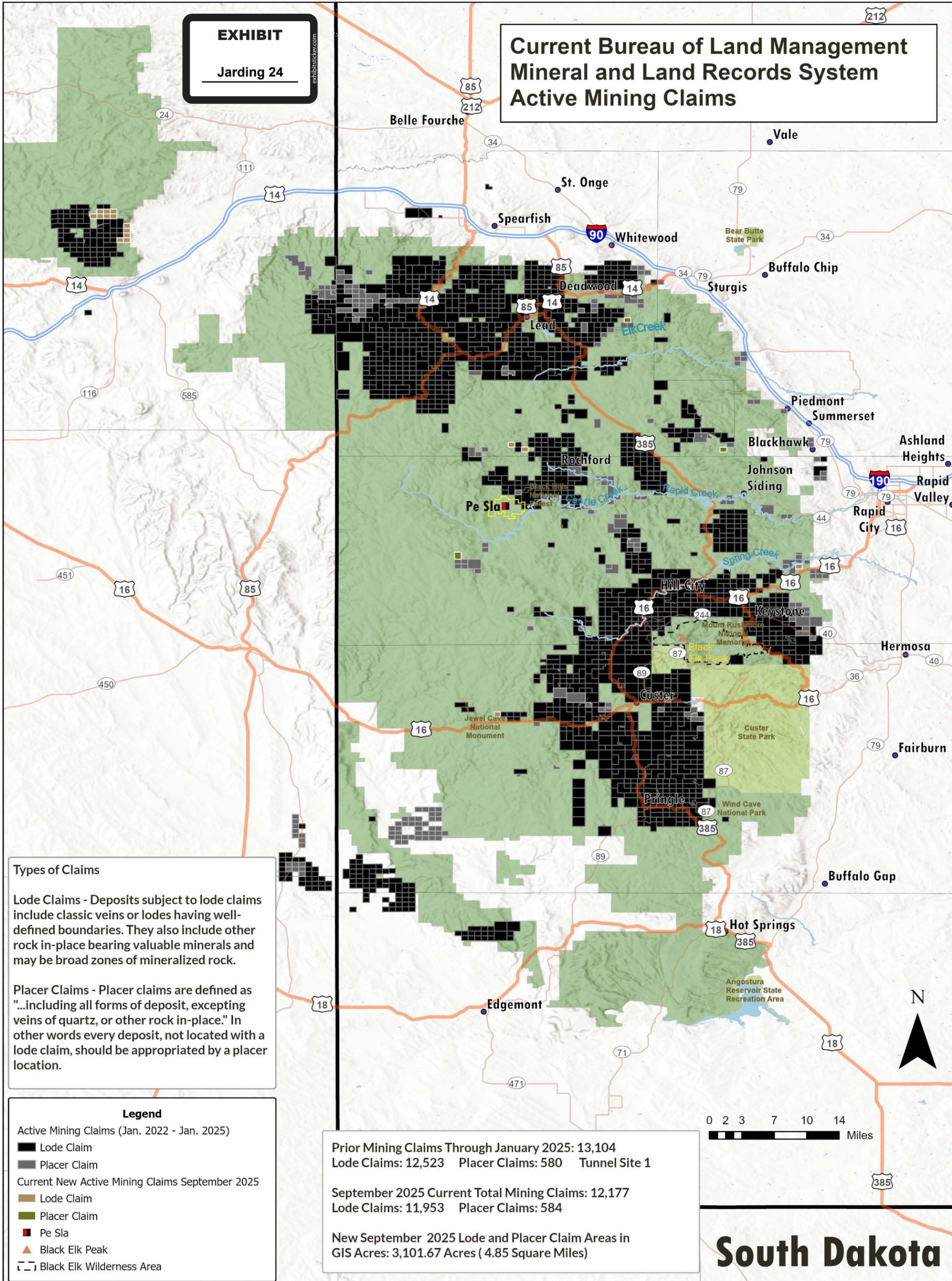
Beta Beta Beta - Biology Honorary Fraternity
Sigma Gamma Epsilon - Earth Science Honorary Fraternity

Work Experience

- 1982 Teaching Assistant, 1982 Remote Sensing Short Course for Minerals and Mineral Fuels. South Dakota School of Mines and Technology, Rapid City, SD. Assisted in the organization of seminar.
- 1980-81 Research Assistant, USFS, Rocky Mountain Range and Forest Experiment Station, SDSM&T, Rapid City, SD. Evaluated and identified mine sites. Recommended corrective measures concerning hazards of sites.
- 1975-80 Contractor, self-employed, Chadron, NE. Constructed residential housing and many major construction projects. Supervised four full-time employees. Responsible for all aspects of business. Financed education at Chadron State College.
- 1977 Salesman, Lampert Building Center, Chadron, NE. Responsible for sales, record keeping, drafting and developing materials lists.
- 1972-75 Medic, U. S. Army.

EXHIBIT
Jarding 24

**Current Bureau of Land Management
Mineral and Land Records System
Active Mining Claims**



Types of Claims

Lode Claims - Deposits subject to lode claims include classic veins or lodes having well-defined boundaries. They also include other rock in-place bearing valuable minerals and may be broad zones of mineralized rock.

Placer Claims - Placer claims are defined as "...including all forms of deposit, excepting veins of quartz, or other rock in-place." In other words every deposit, not located with a lode claim, should be appropriated by a placer location.

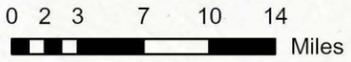
Legend

- Active Mining Claims (Jan. 2022 - Jan. 2025)
 - Lode Claim
 - Placer Claim
- Current New Active Mining Claims September 2025
 - Lode Claim
 - Placer Claim
- Pe Sla
- ▲ Black Elk Peak
- Black Elk Wilderness Area

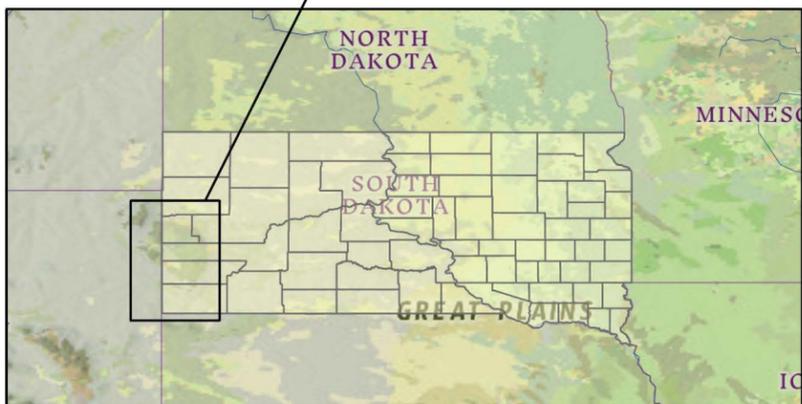
Prior Mining Claims Through January 2025: 13,104
Lode Claims: 12,523 Placer Claims: 580 Tunnel Site 1

September 2025 Current Total Mining Claims: 12,177
Lode Claims: 11,953 Placer Claims: 584

New September 2025 Lode and Placer Claim Areas in GIS Acres: 3,101.67 Acres (4.85 Square Miles)



South Dakota



Strategic Mapping Provided by:



Mato Ohitika Analytics LLC
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South Dakota Study Area
BLM Mining Claims
Paha Sapa
(Black Hills, South Dakota)
October 1, 2025



www.bhcleanwateralliance.org

MAPBOOK
BLM Mining Claims
Lode Claims / Placer Claim
Updated Claims
Q4 2025