



# STATE OF NEVADA

Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

October 20, 2010

Matt Paque  
Tronox LLC  
PO BOX 268859  
Oklahoma City, OK 73134

Re: **Tronox LLC (TRX)**  
**NDEP Facility ID #H-000539**  
Nevada Division of Environmental Protection (NDEP) Response to:  
*Disposition of Monitoring Wells in Proposed Excavation Areas, Tronox Facility,  
Henderson, Nevada*  
Dated: September 27, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and provides the following comments:

1. NDEP acknowledges that the following wells have been modified: M-32 and M-33.
2. NDEP approves TRX's recommendation that the following wells be protected during excavation with the understanding that if the well becomes damaged during excavation that TRX will replace the well within 30 days from the completion of excavation of the corresponding polygon: I-A-R, I-C, I-K, M-13, M-17A, M-18, M-22A, M-25, M-37, M-74, M-79, M-83, M-88, M-110, M-123, M-132, M-133, M-140, M-143, M-147, M-159, M-160, M-165, M-177, and MW-16. NDEP should be notified as soon as possible if any of these wells are damaged during excavation that results in the need for abandonment and replacement.
3. NDEP approves the proper plugging and abandonment of the following wells with the understanding that these wells will be replaced within 30 days from the completion of excavation of the corresponding polygon: M-50, M-85A, M-87, M-111A, M-127, M-187, and M-188.
4. NDEP approves the proper plugging and abandonment of the following wells with the understanding that these wells will be replaced with new wells within 30 days from the completion of excavation of RZ-E only if the results of the RZ-E transect sampling indicate that the excavation width will actually affect these wells: M-34, M-89, and M-180.
5. NDEP-BCA approves the plugging and abandonment of wells M-84 and M-86A without replacement as long as TRX obtains approval from NDEP-BWPC for modification of



TRX's UIC permit (UNEV94218) for using wells M-80 and M-81A as replacement wells for permit monitoring and reporting. Otherwise, these wells should be replaced within 30 days after excavation of the corresponding polygon. Additionally, NDEP-BCA approves plugging and abandonment of wells M-37 and M-102 with the understanding that these will be replaced within 30 days after the completion of excavation of the corresponding polygons. Please contact NDEP-BWPC to obtain any permit modifications or approvals necessary for these activities in order to meet the requirements of the UIC permit.

6. NDEP understands that the following wells are not owned by TRX; however, due care should be taken to protect these wells from damage: AA-BW-03-A, AA-BW-02A, AAMW-16, and I-AD.

Please contact the undersigned with any questions at [sharbour@ndep.nv.gov](mailto:sharbour@ndep.nv.gov) or 775-687-9332.

Sincerely,



Shannon Harbour, P.E.  
Staff Engineer III  
Bureau of Corrective Actions  
Special Projects Branch  
NDEP-Carson City Office  
Fax: 775-687-8335

SH:sh

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Michael J. Foster, Tronox LLC  
Keith Bailey, Environmental Answers LLC  
Susan Crowley, Tronox LLC (Contractor)  
Deni Chambers, Northgate Environmental  
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