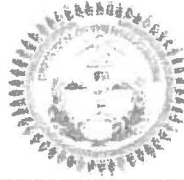


THE NAVAJO NATION



BEN SHELLY PRESIDENT  
REX LEE JIM VICE PRESIDENT

Environmental Protection Agency Superfund Program

P.O. Box 2946 Window Rock, AZ 86515 • Hwy 264/43 Crest Rd. Saint Michaels, AZ 86511  
Tel: 928.871.6859 Fax: 928.871.7333

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GENERAL ELECTRIC CO.  
CEP/RECO

October 14, 2013

Mr. Larry Bush, President  
United Nuclear Corporation  
Post Office Box 3077  
Gallup, New Mexico 87305-3077

Dear Mr. Bush:

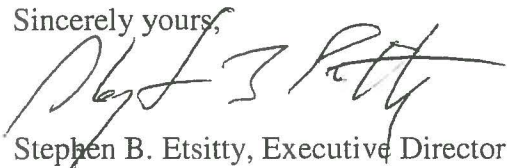
The United Nuclear Corporation (UNC) Church Rock Mill Site has conducted ground water remediation and monitoring since the early 1980s to address uranium mill tailings seepage-impacted contamination in three water-bearing zones at the Site. The ground water contamination in Zone 3 from the North Disposal Cell has slowly migrated northward despite significant efforts by UNC to enhance the extraction well system by hydraulic fracking, alkalinity injection, hydraulic containment, replacing failed wells, and adding new wells as necessary. The North Disposal Cell is not, to our knowledge, a continual source of tailings seepage to the Zone 3 aquifer system. The contaminated ground water in Zone 3 is still migrating slowly down dip and north towards the Section 36-Navajo Nation boundary. According to the 2013 UNC Annual Review Report, it appears the leading edge of the plume is less than 400 feet from the Navajo Nation boundary. Even though the Zone 3 performance monitoring program is comprised of 23 wells for quarterly water level monitoring and 11 wells for quarterly water quality sampling, there is one well north of the Section 36 boundary completed in Zone 3 to enable continued tracking of the Zone 3 plume migration. In order for UNC and the Navajo Nation Environmental Protection Agency (NNEPA) to continue tracking the migration and location of the Zone 3 contaminant plume, sentinel monitoring wells are required north of the Section 36 boundary on trust land of the Navajo Nation.

The NNEPA formally requests that UNC locate, permit, drill, construct, and operate sentinel wells on trust lands of the Navajo Nation north of the UNC Church Rock Mill Site

Section 36 boundary for the purpose of tracking and monitoring the ground water contamination plume in the Zone 3 aquifer. UNC should fulfill the requirements (12 general steps) for drilling a private well on Navajo Nation Trust Lands as described by the Navajo Nation Water Code Administration instructions for "Private Well Development" ([http://www.watercode.navajo-nsn.gov/private\\_well\\_development.html](http://www.watercode.navajo-nsn.gov/private_well_development.html)). Any new roads to access sentinel well sites will require an archaeological clearance and payment of fees. Access to sentinel well sites may also require approval from the leaseholder or farm plot holder. If the proposed sentinel well site locations are not on an officially permitted area, the approval and access process may require that the local grazing committee official, chapter official, or council delegate provide their approval and signature before the well drilling permit and the water use permit receive final approval from the Navajo Nation Water Code Administration.

If you have any questions or need assistance to help fulfill this important request, please contact Ms. Freida S. White or Mr. Eugene Esplain with NNEPA (928-871-6859), or the Navajo Nation Water Code Administration (928-729-4132).

Sincerely yours,



Stephen B. Etsitty, Executive Director  
Environmental Protection Agency  
The Navajo Nation

cc: Freida S. White, Manager, Navajo Nation Superfund Program  
Diana J. Malone, Director, Navajo Nation Waste Regulatory Compliance Dept.  
David A. Taylor, Attorney, Navajo Nation Department of Justice  
Roy Blickwedel, Remedial Project Manager, General Electric, Inc.  
Randy McAlister, Sr. Program Manager, General Electric, Inc.  
Vanessa Begay-Lee, President, Nahodishgish Chapter  
W. Mike Halona, Director, Navajo Nation Land Dept.  
Raymond Benally, Director, Navajo Nation Water Resources Dept.