Executive Summary – Enforcement Matter – Case No. 52839
URANIUM RESOURCES, INC.
RN102380763
Docket No. 2016-1222-WDW-E

Order Type:
1660 Agreed Order
Findings Order Justification:
N/A
Media:
WDW
Small Business:
Yes
Location(s) Where Violation(s) Occurred:
Kingsville Dome, 641 East Farm-to-Market Road 1118, Kingsville, Kleberg County
Type of Operation:
Uranium processing facility
Other Significant Matters:
Additional Pending Enforcement Actions: No
Past-Due Penalties: No
Other: N/A
Interested Third-Parties: None
Texas Register Publication Date: December 30, 2016
Comments Received: No

Penalty Information

Total Penalty Assessed: $21,177
Amount Deferred for Expedited Settlement: $4,235
Total Paid to General Revenue: $16,942
Total Due to General Revenue: $0
Payment Plan: N/A
Compliance History Classifications:
Person/CN - High
Site/RN - Unclassified
Major Source: Yes
Statutory Limit Adjustment: N/A
Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): N/A
Complaint Information: N/A
Date(s) of Investigation: May 4, 2016
Date(s) of NOE(s): July 14, 2016

Violation Information

1. Failed to maintain annulus pressure of at least 100 per square inch ("psi") greater than the injection tubing pressure to prevent leaks from the well into unauthorized zones and to detect well malfunctions. Specifically, the annulus pressure differential for Waste Disposal Well ("WDW") No. 248 dropped below 100 psi for a period of 82 minutes on December 21, 2012, for a period of 25 minutes on August 14, 2013, for a period of 52 minutes on December 3, 2013, and for a period of 54 minutes on January 14, 2014 [30 TEX. ADMIN. CODE § 331.63(e), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 146.67(c) and Underground Injection Control ("UIC") Permit No. WDW 248, Permit Provision ("PP") VII.F. Operating Parameters].

2. Failed to maintain an operating wellhead injection pressure that does not exceed the permitted maximum. Specifically, the operating surface wellhead injection pressure reached 1,217.93 psi in WDW 248 on November 23, 2013, which exceeded the temporary 1,100 psi maximum for a period of 34 minutes [30 TEX. ADMIN. CODE § 331.63(c), 40 CFR § 146.67(a) and UIC Permit No. WDW 248, PP VII.C. Operating Parameters].

3. Failed to conduct continuous or periodic monitoring of pH and specific gravity of injected waste in WDW 248 as required. Specifically, the pH and a specific gravity sample of injected waste for WDW 248 was not collected from January 13-23, 2014 [30 TEX. ADMIN. CODE § 331.64(b)(3) and UIC Permit No. WDW 248, PP VIII.G. Monitoring and Testing Requirements].

4. Failed to properly maintain and use continuous recording devices to record injection tubing pressures, injection flow rates, injection volumes, and tubing-long string casing annulus pressure and volume at WDW 248. Specifically, between April 25, 2016 at 22:45 to April 26, 2016 at 09:00 the well injection pressure device, the flow rate device, the total volume device, and the annulus pressure device were not recording [30 TEX. ADMIN. CODE §§ 305.125(1) and 331.64(d), 40 CFR § 146.67(f), and UIC Permit No. WDW 248, PP VIII.A. Monitoring and Testing Requirements].

5. Failed to adjust the current cost estimate for inflation within 60 days prior to the anniversary date of the first establishment of the financial assurance mechanism. Specifically, the Respondent did not make a financial assurance inflation adjustment for 2015 for WDW 248 by November 1, 2015 [30 TEX. ADMIN. CODE §§ 37.121 and 37.131 and UIC Permit No. WDW 248, PP X. Financial Assurance for Well Closure].

6. Failed to keep complete and accurate records of all monitoring. Specifically, the fourth quarter 2012 Quarterly Injection Report for December 2012 and third quarter 2013 Quarterly Injection Report for August 2013 for WDW 248 did not have accurately reported values for the minimum annulus differential pressure. Also, from December

13-14, 2013, the south pond liner section was inspected but was not marked as checked by the operator on the Daily Plant, Pond, WDW, and Safety Inspection Checklist [30 TEX. ADMIN. CODE §§ 305.125(1) and 331.67(a), 40 CFR § 146.67(f), and UIC Permit No. WDW 248, PP IX. Record Keeping Requirements and XI.D. Surface Facilities].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent implemented the following corrective measures:

a. Implemented procedures designed to ensure the annulus differential pressure is maintained above 100 pounds psi on January 14, 2014;

b. Calibrated injection flow meters and performed maintenance to control wellhead injection pressure in WDW 248 on November 23, 2013;

c. Implemented procedures to begin monitoring the pH and specific gravity of injected waste in WDW 248 on January 24, 2014;

d. Began monitoring the pH and specific gravity of injected waste in WDW 248 on January 24, 2014;

e. Developed and implemented procedures designed to ensure continuous recording devices are maintained and used at the Facility on April 26, 2016; and

f. Submitted the current cost estimate for inflation to demonstrate adequate financial assurance on May 11, 2016.

Technical Requirements:

The Order will require the Respondent to:

a. Within 30 days, develop and implement procedures designed to ensure all monitoring records are complete and accurate; and

b. Within 45 days, submit written certification to demonstrate compliance with a.

Contact Information

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Danielle Porras, Enforcement Division, Enforcement Team 7, MC R-12, (713) 767-3682; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548
Respondent: Dain McCoig, Vice President of South Texas Operations, URANIUM RESOURCES, INC., 641 East Farm-to-Market Road 1118, Kingsville, Texas 78363
Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW)

TCEQ

Policy Revision 4 (April 2014) — *PCW Revision March 26, 2014*

DATES					
Assigned	18-Jul-2016				
PCW	9-Nov-2016	Screening	21-Jul-2016	EPA Due	

RESPONDENT/FACILITY INFORMATION

Respondent	URANIUM RESOURCES, INC.		
Reg. Ent. Ref. No.	RN102380763		
Facility/Site Region	14-Corpus Christi	Major/Minor Source	Major

CASE INFORMATION

Enf./Case ID No.	52839	No. of Violations	6
Docket No.	2016-1222-WDW-E	Order Type	1660
Media Program(s)	Underground Injection Control	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Danielle Porras
		EC's Team	Enforcement Team 7

Admin. Penalty $ Limit Minimum $0 Maximum $25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) — *Subtotal 1* **$31,750**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History **-10.0%** Adjustment — *Subtotals 2, 3, & 7* **-$3,175**

Notes: Reduction due to high performer classification.

Culpability No **0.0%** Enhancement — *Subtotal 4* **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments — *Subtotal 5* **-$7,498**

Economic Benefit **0.0%** Enhancement* — *Subtotal 6* **$0**

Total EB Amounts $177
Estimated Cost of Compliance $4,600

**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 — *Final Subtotal* **$21,077**

OTHER FACTORS AS JUSTICE MAY REQUIRE **0.5%** — *Adjustment* **$100**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes: Enhancement to capture the avoided costs of compliance associated with Violation No. 3.

Final Penalty Amount **$21,177**

STATUTORY LIMIT ADJUSTMENT — *Final Assessed Penalty* **$21,177**

DEFERRAL **20.0%** Reduction — *Adjustment* **-$4,235**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY **$16,942**

Screening Date 21-Jul-2016 **Docket No.** 2016-1222-WDW-E

PCW

Respondent URANIUM RESOURCES, INC.

Policy Revision 4 (April 2014)

Case ID No. 52839

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102380763

Media [Statute] Underground Injection Control

Enf. Coordinator Danielle Porras

Compliance History Worksheet

>> Compliance History *Site* Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (*number of NOVs meeting criteria*)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (*number of judgments or consent decrees meeting criteria*)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	0	0%

Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

High Performer

Adjustment Percentage (Subtotal 7) -10%

>> Compliance History Summary

Compliance History Notes

Reduction due to high performer classification.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) -10%

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** -10%

Screening Date 21-Jul-2016 **Docket No.** 2016-1222-WDW-E **PCW**

Respondent URANIUM RESOURCES, INC. *Policy Revision 4 (April 2014)*

Case ID No. 52839 *PCW Revision March 26, 2014*

Reg. Ent. Reference No. RN102380763

Media [Statute] Underground Injection Control

Enf. Coordinator Danielle Porras

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 331.63(e), 40 Code of Federal Regulations ("CFR") § 146.67(c) and Underground Injection Control ("UIC") Permit No. Waste Disposal Well ("WDW") 248, Permit Provision ("PP") VII.F. Operating Parameters

Violation Description Failed to maintain annulus pressure of at least 100 pounds per square inch ("psi") greater than the injection tubing pressure to prevent leaks from the well into unauthorized zones and to detect well malfunctions. Specifically, the annulus pressure differential for WDW No. 248 dropped below 100 psi for a period of 82 minutes on December 21, 2012, for a period of 25 minutes on August 14, 2013, for a period of 52 minutes on December 3, 2013, and for a period of 54 minutes on January 14, 2014.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

Release	Major	Harm Moderate	Minor
Actual			
Potential		x	

OR

Percent 15.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment $21,250

$3,750

Violation Events

Number of Violation Events 4 389 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $15,000

Four single events are recommended.

Good Faith Efforts to Comply

25.0% Reduction $3,750

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: The Respondent came into compliance on January 14, 2014, prior to the Notice of Enforcement ("NOE") dated July 14, 2016.

Violation Subtotal $11,250

Economic Benefit (EB) for this violation

Estimated EB Amount $27

Statutory Limit Test

Violation Final Penalty Total $9,796

This violation Final Assessed Penalty (adjusted for limits) $9,796

Economic Benefit Worksheet

Respondent URANIUM RESOURCES, INC.
Case ID No. 52839
Reg. Ent. Reference No. RN102380763
Media Underground Injection Control
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling	$500	21-Dec-2012	14-Jan-2014	1.07	$27	n/a	$27
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)				0.00	$0	n/a	$0

Notes for DELAYED costs: Estimated delayed cost to implement procedures designed to ensure the annulus differential pressure is maintained above 100 psi. The Date Required is the first date the annulus differential pressure dropped below 100 psi and the Final Date is the date of compliance.

Avoided Costs	ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance [2]				0.00	$0	$0	$0
ONE-TIME avoided costs [3]				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0

Notes for AVOIDED costs

Approx. Cost of Compliance $500

TOTAL $27

Screening Date 21-Jul-2016 **Docket No.** 2016-1222-WDW-E **PCW**

Respondent URANIUM RESOURCES, INC.

Policy Revision 4 (April 2014)

Case ID No. 52839

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102380763

Media [Statute] Underground Injection Control

Enf. Coordinator Danielle Porras

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code § 331.63(c), 40 CFR § 146.67(a) and UIC Permit No. WDW 248, PP VII.C. Operating Parameters

Violation Description Failed to maintain an operating wellhead injection pressure that does not exceed the permitted maximum. Specifically, the operating surface wellhead injection pressure reached 1,217.93 psi in WDW 248 on November 23, 2013, which exceeded the temporary 1,100 psi maximum for a period of 34 minutes.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

	Release	Harm: Major	Moderate	Minor
OR	Actual			
	Potential		x	

Percent 15.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment $21,250

$3,750

Violation Events

Number of Violation Events 1

1 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $3,750

One single event is recommended.

Good Faith Efforts to Comply

25.0% Reduction $937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: The Respondent came into compliance on November 23, 2013, prior to the NOE dated July 14, 2016.

Violation Subtotal $2,813

Economic Benefit (EB) for this violation

Estimated EB Amount $0

Statutory Limit Test

Violation Final Penalty Total $2,450

This violation Final Assessed Penalty (adjusted for limits) $2,450

Economic Benefit Worksheet

Respondent URANIUM RESOURCES, INC.
Case ID No. 52839
Reg. Ent. Reference No. RN102380763
Media Underground Injection Control
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$1,000	23-Nov-2013	23-Nov-2013	0.00	$0	n/a	$0

Notes for DELAYED costs Estimated cost to ensure timely calibration of injection flow meters and perform maintenance to control injection pressure. The Date Required is the exceedance date and the Final Date is the date of compliance.

Avoided Costs	ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance [2]				0.00	$0	$0	$0
ONE-TIME avoided costs [3]				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0

Notes for AVOIDED costs

Approx. Cost of Compliance $1,000

TOTAL $0

Screening Date 21-Jul-2016 **Docket No.** 2016-1222-WDW-E **PCW**

Respondent URANIUM RESOURCES, INC.

Policy Revision 4 (April 2014)

Case ID No. 52839

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102380763

Media [Statute] Underground Injection Control

Enf. Coordinator Danielle Porras

Violation Number 3

Rule Cite(s) 30 Tex. Admin. Code § 331.64(b)(3) and UIC Permit No. WDW 248, PP VIII.G. Monitoring and Testing Requirements

Violation Description Failed to conduct continuous or periodic monitoring of pH and specific gravity of injected waste in WDW 248 as required. Specifically, the pH and a specific gravity sample of injected waste for WDW 248 was not collected from January 13-23, 2014.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual			
Potential		x	

Percent 15.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment $21,250

$3,750

Violation Events

Number of Violation Events: 1

11 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty $3,750

One quarterly event is recommended from the January 13, 2014 first day of missed monitoring to the January 24, 2014 compliance date.

Good Faith Efforts to Comply

25.0% Reduction $937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: The Respondent came into compliance on January 24, 2014, prior to the NOE dated July 14, 2016.

Violation Subtotal $2,813

Economic Benefit (EB) for this violation

Estimated EB Amount $100

Statutory Limit Test

Violation Final Penalty Total $2,450

This violation Final Assessed Penalty (adjusted for limits) $2,450

Economic Benefit Worksheet

Respondent URANIUM RESOURCES, INC.
Case ID No. 52839
Reg. Ent. Reference No. RN102380763
Media Underground Injection Control
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$1,000	23-Jan-2014	24-Jan-2014	0.00	$0	n/a	$0

Notes for DELAYED costs: Estimated cost to implement procedures to monitor the pH and specific gravity as required. The Date Required is the last date the required daily monitoring for pH and specific gravity was not conducted and the Final Date is the date of compliance.

Avoided Costs	ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance [2]				0.00	$0	$0	$0
ONE-TIME avoided costs [3]	$100	13-Jan-2014	23-Jan-2014	0.00	$0	$100	$100
Other (as needed)				0.00	$0	$0	$0

Notes for AVOIDED costs: Estimated avoided cost to monitor the pH and specific gravity as required ($20 per monitoring event). The Date Required is the first date the required monitoring was not conducted and the Final Date is the last date the pH and specific gravity was not conducted.

Approx. Cost of Compliance $1,100

TOTAL $100

Screening Date 21-Jul-2016 **Docket No.** 2016-1222-WDW-E **PCW**

Respondent URANIUM RESOURCES, INC.

Policy Revision 4 (April 2014)

Case ID No. 52839

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102380763

Media [Statute] Underground Injection Control

Enf. Coordinator Danielle Porras

Violation Number 4

Rule Cite(s) 30 Tex. Admin. Code §§ 305.125(1) and 331.64(d), 40 CFR § 146.67(f), and UIC Permit No. WDW 248, PP VIII.A. Monitoring and Testing Requirements

Violation Description Failed to properly maintain and use continuous recording devices to record injection tubing pressures, injection flow rates, injection volumes, and tubing-long string casing annulus pressure and volume at WDW 248. Specifically, between April 25, 2016 at 22:45 to April 26, 2016 at 09:00 the well injection pressure device, the flow rate device, the total volume device, and the annulus pressure device were not recording.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

	Release	Harm: Major	Moderate	Minor
OR	Actual			
	Potential		x	

Percent 15.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment $21,250

$3,750

Violation Events

Number of Violation Events 1 | 1 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $3,750

One single event is recommended.

Good Faith Efforts to Comply

25.0% Reduction $937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: The Respondent came into compliance on April 26, 2016, prior to the NOE dated July 14, 2016.

Violation Subtotal $2,813

Economic Benefit (EB) for this violation

Estimated EB Amount $0

Statutory Limit Test

Violation Final Penalty Total $2,450

This violation Final Assessed Penalty (adjusted for limits) $2,450

Economic Benefit Worksheet

Respondent URANIUM RESOURCES, INC.
Case ID No. 52839
Reg. Ent. Reference No. RN102380763
Media Underground Injection Control
Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$500	25-Apr-2016	26-Apr-2016	0.00	$0	n/a	$0

Notes for DELAYED costs: Estimated cost to develop and implement procedures designed to ensure continuous recording devices are maintained and used at the Facility. The Date Required is the date the well injection pressure device, the flow rate device, the total volume device, and the annulus pressure device were not recording and the Final Date is the date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance [2]				0.00	$0	$0	$0
ONE-TIME avoided costs [3]				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0

Notes for AVOIDED costs:

Approx. Cost of Compliance $500

TOTAL $0

Screening Date 21-Jul-2016 **Docket No.** 2016-1222-WDW-E **PCW**

Respondent URANIUM RESOURCES, INC.

Policy Revision 4 (April 2014)

Case ID No. 52839

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102380763

Media [Statute] Underground Injection Control

Enf. Coordinator Danielle Porras

Violation Number 5

Rule Cite(s) 30 Tex. Admin. Code §§ 37.121 and 37.131 and UIC Permit No. WDW 248, PP X. Financial Assurance for Well Closure

Violation Description Failed to adjust the current cost estimate for inflation within 60 days prior to the anniversary date of the first establishment of the financial assurance mechanism. Specifically, the Respondent did not make a financial assurance inflation adjustment for 2015 for WDW 248 by November 1, 2015.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor
	x		

Percent 15.0%

Matrix Notes: 100% of the rule requirement was not met.

Adjustment $21,250

$3,750

Violation Events

Number of Violation Events 1

192 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $3,750

One single event is recommended.

Good Faith Efforts to Comply

25.0% Reduction $937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: The Respondent came into compliance on May 11, 2016, prior to the NOE dated July 14, 2016.

Violation Subtotal $2,813

Economic Benefit (EB) for this violation

Estimated EB Amount $26

Statutory Limit Test

Violation Final Penalty Total $2,450

This violation Final Assessed Penalty (adjusted for limits) $2,450

Economic Benefit Worksheet

Respondent URANIUM RESOURCES, INC.
Case ID No. 52839
Reg. Ent. Reference No. RN102380763
Media Underground Injection Control
Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$1,000	1-Nov-2015	11-May-2016	0.53	$26	n/a	$26

Notes for DELAYED costs Estimated cost to demonstrate adequate financial assurance by submitting the current cost estimate for inflation. The Date Required is the date the financial assurance update was due and the Final Date is the date of compliance.

Avoided Costs	ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance [2]				0.00	$0	$0	$0
ONE-TIME avoided costs [3]				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0

Notes for AVOIDED costs

Approx. Cost of Compliance $1,000

TOTAL $26

Screening Date 21-Jul-2016 **Docket No.** 2016-1222-WDW-E **PCW**

Respondent URANIUM RESOURCES, INC.

Policy Revision 4 (April 2014)

Case ID No. 52839

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102380763

Media [Statute] Underground Injection Control

Enf. Coordinator Danielle Porras

Violation Number 6

Rule Cite(s) 30 Tex. Admin. Code §§ 305.125(1) and 331.67(a), 40 CFR § 146.67(f), and UIC Permit No. WDW 248, PP IX. Record Keeping Requirements and XI.D. Surface Facilities

Violation Description Failed to keep complete and accurate records of all monitoring. Specifically, the fourth quarter 2012 Quarterly Injection Report for December 2012 and third quarter 2013 Quarterly Injection Report for August 2013 for WDW 248 did not have accurately reported values for the minimum annulus differential pressure. Also, from December 13-14, 2013, the south pond liner section was inspected but was not marked as checked by the operator on the Daily Plant, Pond, WDW, and Safety Inspection Checklist.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

	Release	Harm: Major	Moderate	Minor
OR	Actual			
	Potential			

Percent 0.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor
		x	

Percent 7.0%

Matrix Notes: At least 30% of the rule requirement was met.

Adjustment $23,250

$1,750

Violation Events

Number of Violation Events: 1

78 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $1,750

One single event is recommended.

Good Faith Efforts to Comply

0.0% Reduction $0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	

Notes: The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal $1,750

Economic Benefit (EB) for this violation

Estimated EB Amount $24

Statutory Limit Test

Violation Final Penalty Total $1,582

This violation Final Assessed Penalty (adjusted for limits) $1,582

Economic Benefit Worksheet

Respondent URANIUM RESOURCES, INC.
Case ID No. 52839
Reg. Ent. Reference No. RN102380763
Media Underground Injection Control
Violation No. 6

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System	$500	4-May-2016	14-Apr-2017	0.95	$24	n/a	$24
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)				0.00	$0	n/a	$0

Notes for DELAYED costs: Estimated cost to develop and implement procedures designed to ensure all monitoring records are complete and accurate. The Date Required is the investigation date and the Final Date is the estimated date of compliance.

Avoided Costs	ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance [2]				0.00	$0	$0	$0
ONE-TIME avoided costs [3]				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0

Notes for AVOIDED costs

Approx. Cost of Compliance $500

TOTAL $24

The TCEQ is committed to accessibility.
To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.

TCEQ Compliance History Report

Compliance History Report for CN601086952, RN102380763, Rating Year 2015 which includes Compliance History (CH) components from September 1, 2010, through August 31, 2015.

Customer, Respondent, or Owner/Operator: CN601086952, URANIUM RESOURCES, INC. **Classification:** HIGH **Rating:** 0.00

Regulated Entity: RN102380763, Kingsville Dome **Classification:** UNCLASSIFIED **Rating:** -----

Complexity Points: 5 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 641 E FM 1118 KINGSVILLE, TX 78363-2628, KLEBERG COUNTY

TCEQ Region: REGION 14 - CORPUS CHRISTI

ID Number(s):

AIR NEW SOURCE PERMITS REGISTRATION 15129
AIR NEW SOURCE PERMITS ACCOUNT NUMBER KJ0020N
UNDERGROUND INJECTION CONTROL PERMIT UR02827
UNDERGROUND INJECTION CONTROL PERMIT WDW247
UNDERGROUND INJECTION CONTROL PERMIT WDW248
UNDERGROUND INJECTION CONTROL PERMIT 5X250011
UNDERGROUND INJECTION CONTROL PERMIT 5X2500111
UNDERGROUND INJECTION CONTROL PERMIT UR02827PAA3
UNDERGROUND INJECTION CONTROL PERMIT UR02827PAA2
UNDERGROUND INJECTION CONTROL PERMIT UR02827PAA1
URANIUM LICENSE R03653

Compliance History Period: September 01, 2010 to August 31, 2015 **Rating Year:** 2015 **Rating Date:** 09/01/2015

Date Compliance History Report Prepared: August 25, 2016

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: August 25, 2011 to August 25, 2016

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Danielle Porras **Phone:** (713) 767-3682

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period? YES
2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:
N/A

B. Criminal convictions:
N/A

C. Chronic excessive emissions events:
N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	October 05, 2011	(952504)
Item 2	May 16, 2012	(1003146)
Item 3	May 17, 2012	(1003000)
Item 4	June 13, 2012	(1013041)
Item 5	February 05, 2013	(1056134)

Item 6	May 29, 2013	(1093894)
Item 7	June 21, 2013	(1099754)
Item 8	March 12, 2014	(1146808)
Item 9	May 19, 2014	(1167079)
Item 10	June 24, 2014	(1174105)
Item 11	February 27, 2015	(1228294)
Item 12	July 03, 2015	(1260015)
Item 13	March 30, 2016	(1322331)
Item 14	May 13, 2016	(1329097)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN	§	**BEFORE THE**
ENFORCEMENT ACTION	§	
CONCERNING	§	**TEXAS COMMISSION ON**
URANIUM RESOURCES, INC.	§	
RN102380763	§	**ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2016-1222-WDW-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding URANIUM RESOURCES, INC. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 361 and TEX. WATER CODE chs. 7 and 27. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a uranium processing facility located at 641 East Farm-to-Market Road 1118 in Kingsville, Kleberg County, Texas (the "Facility"). The Respondent is utilizing, has begun drilling, or is converting injection wells as that term is defined in TEX. WATER CODE § 27.002(11).

2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE §§ 5.013 and 27.011 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 361, TEX. WATER CODE ch. 27, and the rules of the TCEQ.

3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

4. An administrative penalty in the amount of $21,177 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid $16,942 of the penalty and $4,235 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or

required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.

7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.

8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Facility:

   a. Implemented procedures designed to ensure the annulus differential pressure is maintained above 100 pounds per square inch ("psi") on January 14, 2014;

   b. Calibrated injection flow meters and performed maintenance to control wellhead injection pressure in Waste Disposal Well ("WDW") 248 on November 23, 2013;

   c. Implemented procedures to begin monitoring the pH and specific gravity of injected waste in WDW 248 on January 24, 2014;

   d. Began monitoring the pH and specific gravity of injected waste in WDW 248 on January 24, 2014;

   e. Developed and implemented procedures designed to ensure continuous recording devices are maintained and used at the Facility on April 26, 2016; and

   f. Submitted the current cost estimate for inflation to demonstrate adequate financial assurance on May 11, 2016.

II. ALLEGATIONS

During an investigation conducted on May 4, 2016, an investigator documented that the Respondent:

1. Failed to maintain annulus pressure of at least 100 psi greater than the injection tubing pressure to prevent leaks from the well into unauthorized zones and to detect well malfunctions, in violation of 30 TEX. ADMIN. CODE § 331.63(e), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 146.67(c) and Underground Injection Control ("UIC") Permit No. WDW 248, Permit Provision ("PP") VII.F. Operating Parameters. Specifically, the annulus pressure differential for WDW No. 248 dropped below 100 psi for a period of 82 minutes on December 21, 2012, for a period of 25 minutes on August 14, 2013, for a

period of 52 minutes on December 3, 2013, and for a period of 54 minutes on January 14, 2014.

2. Failed to maintain an operating wellhead injection pressure that does not exceed the permitted maximum, in violation of 30 TEX. ADMIN. CODE § 331.63(c), 40 CFR § 146.67(a) and UIC Permit No. WDW 248, PP VII.C. Operating Parameters. Specifically, the operating surface wellhead injection pressure reached 1,217.93 psi in WDW 248 on November 23, 2013, which exceeded the temporary 1,100 psi maximum for a period of 34 minutes.

3. Failed to conduct continuous or periodic monitoring of pH and specific gravity of injected waste in WDW 248 as required, in violation of 30 TEX. ADMIN. CODE § 331.64(b)(3) and UIC Permit No. WDW 248, PP VIII.G. Monitoring and Testing Requirements. Specifically, the pH and a specific gravity sample of injected waste for WDW 248 was not collected from January 13-23, 2014.

4. Failed to properly maintain and use continuous recording devices to record injection tubing pressures, injection flow rates, injection volumes, and tubing-long string casing annulus pressure and volume at WDW 248, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and 331.64(d), 40 CFR § 146.67(f), and UIC Permit No. WDW 248, PP VIII.A. Monitoring and Testing Requirements. Specifically, between April 25, 2016 at 22:45 to April 26, 2016 at 09:00 the well injection pressure device, the flow rate device, the total volume device, and the annulus pressure device were not recording.

5. Failed to adjust the current cost estimate for inflation within 60 days prior to the anniversary date of the first establishment of the financial assurance mechanism, in violation of 30 TEX. ADMIN. CODE §§ 37.121 and 37.131 and UIC Permit No. WDW 248, PP X. Financial Assurance for Well Closure. Specifically, the Respondent did not make a financial assurance inflation adjustment for 2015 for WDW 248 by November 1, 2015.

6. Failed to keep complete and accurate records of all monitoring, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and 331.67(a), 40 CFR § 146.67(f), and UIC Permit No. WDW 248, PP IX. Record Keeping Requirements and XI.D. Surface Facilities. Specifically, the fourth quarter 2012 Quarterly Injection Report for December 2012 and third quarter 2013 Quarterly Injection Report for August 2013 for WDW 248 did not have accurately reported values for the minimum annulus differential pressure. Also, from December 13-14, 2013, the south pond liner section was inspected but was not marked as checked by the operator on the Daily Plant, Pond, WDW, and Safety Inspection Checklist.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph 4. The payment of this penalty and the Respondent's compliance with all of the requirements

set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: URANIUM RESOURCES, INC., Docket No. 2016-1222-WDW-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The Respondent shall undertake the following technical requirements:

a. Within 30 days after the effective date of this Order, develop and implement procedures designed to ensure all monitoring records are complete and accurate, in accordance with 30 TEX. ADMIN. CODE § 331.67.

b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be signed by the Respondent and shall include the following certification language:

> "I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Waste Section Manager
Corpus Christi Regional Office
Texas Commission on Environmental Quality
6300 Ocean Drive, Suite 1200
Corpus Christi, Texas 78412-5503

3. All relief not expressly granted in this Order is denied.

4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.

5. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.

6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.

7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission — Date

For the Executive Director — Date 2/6/18

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature — Date 11/23/16

Dain McCoig — Vice President South Texas Operations

Name (Printed or typed) — Title

Authorized Representative of
URANIUM RESOURCES, INC.

☐ *If mailing address has changed, please check this box and provide the new address below:*

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.