



Tell the NRC to Protect Water Resources during Uranium Mining Comment Deadline May 13th

Strata Energy wants to mine uranium in Crook County Wyoming, near Devil's Tower National Monument and Oshoto Reservoir. But, before the company can mine, it has to get a permit from the Nuclear Regulatory Commission (NRC). As part of the permitting process, NRC is required to prepare an environmental impact statement (EIS) to study the environmental impacts of the project and consider ways to protect the natural resources of the area and health of nearby residents.

The NRC released a draft EIS at the end of March. Unfortunately, the NRC's draft EIS heavily relies on the agency's "Generic" environmental impact statement that it prepared back in 2009. The Generic EIS looked at uranium mining impacts in a "generic" way across the western U.S. and was billed as a way to "streamline" NRC permitting and speed up the review process. But for people living next to proposed uranium mines, the Generic EIS was viewed as a way to shortcut public participation opportunities and prevent careful analysis of localized impacts. That's unfortunately what has happened in this case.

You have an opportunity to tell the NRC to once and for all stop relying upon its Generic EIS and fully consider the likely impacts to water, land, and air resources from uranium mining in Crook County. **NRC is accepting comments on the draft EIS until May 13th.**

Please tell the NRC to:

- Not refer to the Generic EIS when it analyzes impacts of Strata's project.
- Fully consider that the proposed ISL area has over 5,000 abandoned drill holes from the early days of uranium exploration. According to NRC's draft EIS, Strata Energy knows that there are at least 1,682 old exploration wells in the area, but the company has only located less than half of them – 759. And out of that 759, they have successfully plugged only 55. That means there are over 1,600 old wells in the area that could serve as conduits for water contamination from Strata's project (and we know there are likely thousands more). NRC's draft EIS acknowledges that water contamination could result from "improperly plugged previous exploration drillholes that have not yet been properly abandoned," but then illogically assumes that impacts to water resources will be "small." NRC needs to do a better job at analyzing the risk that these old drillholes – both inside and immediately adjacent to Strata's project area – represent.
- Fully consider that the proposed ISL process has an extremely high consumptive use of water, which has the potential to draw down the aquifers that provide drinking water and water for livestock.
- Consider the track record of spills, excursions, pond leaks, and failed aquifer restoration at previous uranium mines in Wyoming, Nebraska, and Texas. Impacts of past uranium projects have been significant – with routine spills, leaks, and excursions of chemicals into adjacent aquifers. To date, not a single uranium project has fully restored an aquifer

to pre-mining water quality. There is no indication that Strata's operations will prevent these impacts, yet NRC ignores them in its draft EIS.

- Consider the cumulative impacts to water quality and quantity from the full scope of Strata's whole project, which includes this first permitted site of the Ross Project with an anticipated four additional projects in the approximately twenty mile area of the "Lance District" in Crook County.
- Minimize light pollution and other industrial impacts to landowners in the Oshoto area and to Devil's Tower National Monument.
- Minimize impacts to livestock grazing and recreation in the area.
- Minimize impacts from truck traffic, dust, and noise.

Your comments do not have to be lengthy and technical. They can simply use the bullet points above or you can write in your own words why the NRC should do good analysis of the impacts.

You can submit comments via in one of a few ways:

1) Online via www.regulations.gov through "Docket ID NRC-2011-0148" (go to [this link](#) and then click on the "comment now" button on the top right side of the page)

2) Via mail to:
Cindy Bladey, Chief
Rules, Announcements and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

3) Via fax to: 301-492-3446 or

The full Draft EIS is available on [NRC's website](#) (just be forewarned that it is a 73+MB file so you will need very fast internet service to download)

If you have any questions, please don't hesitate to contact Shannon at 307-672-5809 or sanderson@powderriverbasin.org

Thanks for your action!