

In previous informational emails we have informed you of the current opportunity to comment on the Draft Environmental Impact Statement (EIS) for NRC permitting of Strata Energy's ISL site near Oshoto, in Crook County Wyoming.

For those who have not found time to comment, this information covers one of the more critical issues with the Draft EIS, which is **the failure to adequately address the proper plugging of abandoned drill holes**. We would imagine that many people, upon reading about this ISL site in Northeastern Wyoming, may have neglected to take the time to comment to the NRC, because they might feel that "it is not in my backyard", and that there are other more pressing issues in their areas. Unfortunately the existence of improperly abandoned drill holes poses a threat of cross contamination to aquifers above and below the so-called confined ore zone. Because of this, **all ground aquifers, including the productive Madison aquifer, could potentially be threatened**.

The potential for impacts to the Madison aquifer make this problem far more out-reaching than the area in which the mining is proposed. The Madison aquifer underlies eight states, including Wyoming, South Dakota, and Montana. Many large cities rely on it, as well as National Parks, and the Wind River Indian Reservation in Wyoming. Rapid City, Spearfish, and many other towns in S. Dakota use water from the Madison, and it is considered one of South Dakota's most productive aquifers. In Wyoming, the communities of Gillette, Upton, Newcastle, Pine Haven, Hulett, Sundance, Glenrock, Douglas, Osage, Kaycee, and Midwest use the Madison aquifer for some or all of their potable water supply.

In light of this important information, we hope that many of you will take the time to comment to the NRC, if only to bring this possibility of far reaching negative impacts to the forefront. Please feel free to use any or all of the following comments.

To protect our ground water aquifers, please inform the NRC of the following:

- The NRC needs to fully consider that the proposed ISL area has over 5,000 abandoned drill holes from the early days of uranium exploration. Some of these wells were likely improperly plugged and abandoned which means they can connect the aquifers and may cause cross contamination to aquifers which provide water for drinking and livestock.
- According to NRC's draft EIS, Strata Energy knows that there are at least 1,682 old exploration drill holes 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 drill holes in the area that could serve as conduits for water contamination from Strata's project, with many more located outside of the proposed mining area.
- While the draft EIS states that the applicant will properly plug *all* these holes, there is no information provided to demonstrate either that the applicant will be able to identify all the holes, or that it will be able to fill them in a manner that insures they do not continue to contribute to fluid migration.
- The draft EIS does not resolve the concern regarding the risk of fluid migration, but simply assumes the feasibility of locating and plugging these thousands of drill holes and relies on the applicant to correctly perform these actions.
- NRC's draft EIS acknowledges that water contamination could result from "improperly plugged previous exploration drill holes that have not yet been properly abandoned," but then illogically assumes that impacts to water resources will be "small." The applicant has simply failed to demonstrate that Strata can contain fluid migration that may pollute the environment as a result of the project.

- NRC needs to do a better job at analyzing the risk that these old drill holes – both inside and immediately adjacent to Strata’s project area – represent.

You can submit comments via one of a few ways:

- 1) Online via

<http://www.regulations.gov/#!documentDetail;D=NRC-2011-0148-0007>

Upon reaching the site, simply click on “Comment Now”

- 2) Via mail to: **(Mailed comments must arrive at NRC on May 13th deadline)**

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- 3) Via fax to: 301–492–3446

Thanks again for taking time to help with this important issue.