



Tell the NRC to Protect Water Resources during Uranium Mining Comment Deadline September 28th

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 was 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.

Our organization, along with our partners at the Natural Resources Defense Council, have formally intervened in the permitting process and have legally challenged the NRC's EIS. The Atomic Safety and Licensing Board will hold a hearing on our legal challenge in Gillette from September 30th-October 2nd.

Our legal arguments can be bolstered by comment from you – members of the public. The Board offers public comment opportunities and while they are not considered formal testimony for the hearing, they may aid the Board in considering the issues.

You have an opportunity to tell the Atomic Safety and Licensing Board that NRC's environmental analysis does not accurately assess likely impacts to groundwater resources. **The Atomic Safety and Licensing Board is accepting comments until September 28th.**

Please tell the Atomic Safety and Licensing Board that:

- NRC's EIS does not accurately assess baseline groundwater conditions at Strata's site. Accurately assessing baseline groundwater conditions is critical to determine future impacts related to uranium recovery operations.
- NRC's EIS is deficient because it does not fully consider that the proposed uranium recovery area has over 5,000 abandoned drill holes from the early days of uranium exploration. According to NRC's 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 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.
- Consider the track record of failed aquifer restoration at previous uranium mines in Wyoming, Nebraska, and Texas. 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.

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 a better analysis of the impacts.

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

- 1) Provide an oral statement at a public comment hearing the Board is holding in Sundance. The hearing is on September 28th from 3-6 p.m. at the Sundance Community Meeting Room, Crook County Court House Basement, 309 Cleveland St. Please show up early and RSVP if you would like to speak. Requests to speak may be sent by mail to: Administrative Judge G. Paul Bollwerk III, Atomic Safety and Licensing Board Panel, Mail Stop T-3F23, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; by fax to 301-415-5599; or by email to kathleen.schroeder@nrc.gov and paul.bollwerk@nrc.gov
- 2) Provide written comments to the Board prior to September 28th. Comment should be sent by mail to Office of the Secretary, Rulemakings and Adjudications Staff, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; by fax to 301-415-1101; or by e-mail to hearingdocket@nrc.gov Please also send a copy to paul.bollwerk@nrc.gov

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

Thanks for your action!



Strata Energy's proposed uranium recovery site in Crook County, Wyoming