From:

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To:

<nrcrep@nrc.gov>

Date: Subject: Wed, Aug 8, 2007 4:27 PM **GEIS Scoping Comment** 

Gentleman,

Thank you for the opportunity to comment on your other comments on the GEIS during your scoping meeting of August 7, 2007 at the Parkway Plaza, Casper Wyoming. First let me address some of the issues that were thrown to your staff last night. I know that you briefly mentioned that you were cooperators with other agencies in your opening statement, as you were only the regulatory agency over the uranium licensing. I think you may have forgot to mentioned to Mrs. Lewis that during the GEIS and site specific EIS or EA process, the Bureau of Land Management, Bureau of Indian Affairs, and or the Forest Services, are your eyes and hands of contact in the field for federal minerals and in some cases on split estate lands when there is no surface owner agreement. We work with the grazing leases, the wildlife issues with the Wyoming Game and Fish, T&E issues, the cultural, paleontological, and visual concerns on the ground with landowners and the developer of the minerals on a daily basis. As far as the Senate Representative from Colorado, I think that there was a proven track record of mining uranium, that was established during the conventional mining days of the 60 and 70's for water protection, and for ISL from the late 80's 90's to the present with companies like Rio Algom and PRI that are still active. That the EPA and the States Agencies, such as the Wyoming Department of Environmental Quality-Land Quality Division, monitor the water issues that occur during the development of uranium with ISL. My job here as a BLM geologist is to see that the development by industry, whether oil and gas, coal bed methane, or locatable minerals, do not contaminate the fresh water aquifers. Now you got to remember that the uranium, for most trends are found in either in tabular form or in roll front deposits and the uranium is tied up within fresh water aguifers. Some of these fresh waters are the same ones that cattle and sheep have been drinking from for years. That in most cases the ISL process (In Situ Leaching) will move the U238 by adding CO2 water, into the system, up and through the production well, through a cone of depression created by the production well. As you mentioned that the operator is bonded fully to rehabbed both the surface and to restore the fresh water aquifer as well, thus removing from the system the added CO2 at the end of the operation.

Lets not forget we are a Nation, so we must all operate together developing our resources and stop playing the game "Its not going to happen in my back yard" routine. That answers Jill's question as why are you allowing other countries to develop our minerals. Like you stated during the meeting, all these companies are subsidiary companies of French or Canadian based Companies. First of all you have to be a citizen of this country to stake mining claim. The reason why all these companies are backed by foreign countries is due to one individual in 1977, who played the "It's not going to happen in my back yard" game. He volunteer to do a one year study on nuclear energy, for then, President Carter. Why the President did not have Kerr McGee, who had been in business for some 30, o at least the Academy of Science to investigate this subject, is beyond me. At the same time this

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individual wrote the study, he was busy producing, directed, and stared in his own movie, "China Syndrome". A movie to make the then Nuclear Industry look bad. I wont mentioned any names, but he put all the major companies out of the uranium business who were leading the world in nuclear power development, such as Kerr McGee, Union Energy (Union 76), Western Nuclear, American Nuclear, Pioneer Nuclear, and others, which many of the individuals now are the Presidents or CEO's for this subsidiary companies. I was also left unemployed and without work myself. Just a little bias to have put his nation behind in development of an energy source which, handled right, will provide the needs for energy for this nation for many years to come. I hope sure hope Colorado has plenty of sun and wind to generate its electrical and fuel needs for the future. I say this as a individual who once worked in the uranium Industry and had to suffer for one man's greed and lack of vision, and concern of others and not as a employee of the BLM.

Now to answer both the mining association and the industry questions as to why the GEIS review for both the conventional and the ISL mining methods. First of all the Federal agencies are mandated by congress since 1960's to do a NEPA (National Environmental Policy Act) on all application received to develop Federal Minerals on Federal Lands, except on split estate lands where no surface owner agreement is reached, then the agency or in this case the NRC has to do NEPA, document, do to the nature of the material being mined. Now in areas that had an EIS or an EA done in the past, they asked why another EIS or EA is needed. Since a lot of the EA's or EIS work was done maybe back in the 60', 70's, or early 80's, many of the BLM field offices have under gone up dates on their RMP's (Resource Management Plans) and or other developments on the multiple purpose federal lands have impacted the areas of proposed development, such as CBM, oil and gas, and now uranium. For many acres a new EIS is necessary to cover the issues involved. To answer Jill's question as to the CMB de-watering issues of coals for methane development, where you need 150 of water table plus, to develop the roll front uranium with a ISL project. Here the issue is left for the operators on a first come or seniority bases. One CBM lessee near an active ISL operation in my field office area, opt to let its lease expire to develop the methane, due to the existing operation. Rather than work diligently with the ISL operator to insure he did not de-water CO2 uranium waters onto the surface they moved on. I think Industry will learn to grasp hold of just how close they can be to other operations, without affecting the other operation. It will take a lot of cooperation between all the players and agencies to develop this nations reserves with all operators communication daily to prevent any major issues concerning a precious commodity as water. I pray they will over look the issue time means money to work together to preserve the commodity of water, and not take it to the courts to decide. As a Nation we are all in this boat together.

Last of all, I have one comment from myself for the committee of the NRC. As a cooperator on reviewing the GEIS, or any comprehensive EA's or EIS in my field office area, I hope the NRC will recognize that its not alone in the NEPA process and will work to notify the agencies of concern in advance as to when we will receive a draft EA or EIS, with your planned time frames. Many of our BLM offices, such as Buffalo, Rawlins, Casper, and Newcastle in Wyoming have been highly impacted by the other energy development as well, and our staffs are spread thin. We have to work with our other staff members during such a review for wildlife, cultural,

and range issues and to coordinate this with the other specialist work. So having a heads up and a flexible time line for reviewing the EIS or EA would help us all by contacting us far in advance, so that the work can progress for all in a timely matter. Thank you for your time to comment on this issue.

Sincerely yours,

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