



## *Working to Protect Native Species and Their Habitats*

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9/17/08

Bureau of Land Management  
Casper Field Office  
2987 Prospector Drive  
Casper, WY 82609

RE: Scoping Comments on Reynolds Ranch ISR Project Environmental Assessment

Dear Sir/Madam:

On behalf of the Biodiversity Conservation Alliance, a non-profit conservation advocacy group fighting for public land issues in Wyoming and surrounding states. Please accept the following comments on the scoping of the CAMECO Resources, Inc. Reynolds Ranch ISR Uranium Project's environmental assessment.

### Introduction

On June 30, 2008, the Bureau of Land Management sent out a scoping notice surrounding the preparation and planning for an Environmental Assessment (EA) for a proposed uranium in situ recovery (ISR) project to be known as the Reynolds Ranch, located within Converse County, Wyoming.

The BCA is concerned with sensitive wildlife species that may be impacted by this proposed ISR facility and the degradation of aquifers and important landscapes/habitat in the region.

### Water Quality Impacts

- Baseline testing of water quality should be done in order to set a benchmark for the restoration stage and decommissioning.

BOARD OF DIRECTORS: Perry Wechsler, Senior Atmospheric Scientist, University of Wyoming; Mark Jenkins, National Geographic Contributing Editor; Jeff Kessler, founder of Biodiversity Conservation Alliance; Chip Rawlins, author and former employee of Bridger-Teton National Forest; Alyssa Wechsler, co-founder, University of Wyoming Students for Sustainability; and Jason Lillegraven, Paleontologist and former Wilderness Society board member.

- Up-to-date water quality data reflecting the current status of surface water quality should be done. Late 1980 studies from previous agencies reports are not adequate and do not reflect any changes in the region's water quality. Detailed groundwater flow modeling of the type undertaken for the Pacific Rim Shallow Gas Project (Rock Springs Field Office) should be undertaken to determine where any contaminant plume is likely to move.
- During the ore testing stage, test holes should be plugged and secured in accordance with regulations in order to prevent future contamination of nearby aquifers and watersheds.
- The deep well injection method for waste water should be secured and prevention of contamination with other watersheds should be top priority.
- Monitoring of adjacent coal bed methane drilling projects should be addressed by Cameco, Inc. in order to keep up with the current water draw down rate and any conflicting water resource uses with the Reynolds Ranch property, which may have cumulative impacts on water quantity and quality.

#### Wildlife Impacts

- Road and traffic impacts should be addressed on soil, habitat, and wildlife in general. Such issues as erosion, runoff, and wildlife disturbance/collisions must be addressed.
- Previous preliminary monitoring efforts of wildlife indicated, Pronghorn Antelope, Mule Deer, Whitetail Deer, Bald Eagle, Golden Eagle, Ferruginous Hawks, and Sage Grouse. Impacts to these species, as well as BLM Sensitive Species such as swift fox, black-tailed prairie dog, and BLM sensitive plants should be considered in the EA. Project activities should not be sited in big game crucial winter ranges, identified migration routes, or in Core Areas identified by Executive Order in the state's sage grouse conservation plan.
- Up-to-date monitoring studies must be done in order to get a current picture of wildlife populations in the area. The presence of grasslands and sagebrush habitat in the region and the impacts of energy development on this habitat must be addressed. Many sagebrush dependent species such as Sage Grouse and Pronghorn Antelope are sensitive to impacts from energy development.
- The fencing proposed to exclude livestock from the well fields for 325 acres should be wildlife compatible and consistent with WGFD standards. Many species like Pronghorn Antelope cannot jump over fences and proper ground clearance (>16 inches), and smooth bottom wires are needed in order to allow wildlife species to move without constraints.

Thank you in advance for considering these comments.

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Wayne D. Prindle, BCA