

**Summary of Meetings with NRC and Wyoming BLM Field Offices  
(Week of September 21, 2008)**

**Buffalo (23<sup>rd</sup>) – POC (Paul Beels)**

- Suggested a cooperation model that relies on a focal point at the State BLM Office
- Suggested considering the 2003 programmatic EIS for oil and gas exploration and their RMP when developing site-specific EAs
- Working on a PA under Section 106 (NHPA) for the Pumpkin Buttes area
- Land owner agreements, particularly if split-estate, could be problematic
- Will comment on the DGEIS if an extension is granted
- BLM owns 10 percent of surface land and 60 percent of the sub-surface minerals in the Buffalo region

**Lander (24<sup>th</sup>) – POC (Jon Kaminsky)**

- Interested in sharing information with NRC to support site-specific EAs
- Use RMP for cumulative effects analysis
- Suggested NRC work directly with Lander Field Office, not with State Coordinator
- Requested notification as soon as a license application for an ISL is docketed
- Lander Field Office will share information with NRC (along with WY DEQ) on site-specific EAs
- Requested a list of POCs (with phone #s) on all anticipated ISL applications
- Lander Field Office will comment on the DGEIS

**Rawlins (25<sup>th</sup>) – POC (Mark Newman)**

- Recommended an MOU between the NRC and BLM be developed, laying out roles and responsibilities, and signed by the State Office
- Rawlins would be responsible for the Lost Creek ISL (lies close to the Lander Office boundary)
- BLM issues Plans of Operation for developments on BLM land greater than 5 acres
- Plans of Operation require EAs
- Rawlins is interested in cooperation with the NRC to develop one encompassing EA, rather than two separate EAs, which may confuse the applicant
- No conventional uranium mills are currently proposed in the Rawlins area
- Ozone is nearing the NAAQS for WY (DEQ has primacy)
- DEQ requires restoration of GW (after ISL activities) to background (no alternate concentration limits applied)
- Rawlins Field Office will comment on the DGEIS

**Casper (25<sup>th</sup>) – POC (Tom Foertsen)**

- BLM has a discretionary 30-day public scoping period and a required 30-day period for draft EAs
- In the past, there have been breakdowns in communications with the NRC on land issues
- The State BLM NEPA Coordinator is Ken Peacock
- Requested coordination with NRC on ISL applications
- Want to be aware of new ISL applications as soon as docketed
- Want to know the NRC POCs and schedules for each new application
- Want to work with the NRC to develop (jointly) an EA outline
- Want to set up regular communications between NRC PMs and BLM POCs
- Casper will submit comment on the DGEIS

September 23, 2008, 1:00 pm

BLM Buffalo Field Office

Paul Beels, Associate Field Manager  
307-684-1161  
Paul\_Beels@blm.gov

BLM Buffalo Field Office was not aware of the GEIS being out for public comment. Due to other workload, if no extension to the comment period is granted, they will not be able to formally comment.

If an extension is granted, P. Bubar will let Paul Beels know. BLM Buffalo was encouraged by NRC to comment as they have information very relevant to analyzing cumulative impacts, although most of their comments would come from site-specific assessment documents.

Relevant points from BLM that may require follow-up:

A programmatic EIS for oil and gas exploration was issued in 2003. This should be considered in our programmatic and site-specific analysis.

BLM is updating their Resource Management Plan for Campbell, Johnson and Sheridan counties. The updated plan should be considered in NRC's NEPA analysis.

BLM noted an assumption in the draft GEIS that oil and gas exploration is in place before ISL is not valid.

There are 5-6 EISs ongoing related to coal bed methane. Mike Karbs in the Casper BLM office should be contacted for information on these EISs.

Land owner agreements – particularly where oil and gas exploration are ongoing – should be understood. There may be split estate agreements.

Better clarity on applications which will be on BLM land would assist with narrowing anticipated BLM interfaces.

In the Buffalo region, BLM owns:

- 10 percent of surface land
- 60 percent of sub-surface minerals

BLM Buffalo suggested a cooperation model that relies on a focal point at the state BLM Office. The State POC would be NRC's first interface point. The BLM State POC would work with the field office to name a project lead for site-specific EAs. The project lead would put together an inter-disciplinary team. Roles of the team could be:

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**Summary of Discussions with Bureau of Land Management - HQ**

**September 18, 2008, 12:00 pm**

**BLM Headquarters**

Mitch Leaverette – Chief Solid Minerals Division  
202-452-5088

Roger Haskins – Senior Specialist for Mining Law  
202-452-0355

BLM Headquarters supports the need for coordination and cooperation on the site-specific environmental assessments.

The coordination will be with the BLM Field Offices. BLM headquarters will assist with establishing the points of contact.

The BLM State offices will provide coordination between the field offices and NRC.

The Wyoming State office point of contact has just been reassigned to Montana. Communication with him will be beneficial even though he will not be a long-term point of contact.

The Acting Wyoming state Field Office Director is Bob Jansen. His office is in Cheyenne.

BLM headquarters would assist with negotiating an MOU, if one is necessary.

Agreement was reached to reconvene between BLM headquarters and NRC after NRC meets with BLM field officers.

## Meeting with BLM – Lander

September 24, 2008, 1:00 p.m.

Jon Kaminsky  
307-332-8412  
[Jon.Kaminsky@blm.gov](mailto:Jon.Kaminsky@blm.gov)

Meeting took place with many State, local and federal employees that were meeting to update the BLM-Lander Resource Management Plan. Wyoming DEQ also attended the meeting.

Companies interested in doing exploration on federal land must submit a Plan of Operation to BLM. If BLM approves the Plan of Operation, it is considered a major federal action. BLM does EAs to support the decision to approve or not approve the Plan of Operation. Eighteen companies have submitted Plans of Operation to BLM-Lander.

BLM-Lander is interested in sharing information with NRC to support the site-specific EAs.

BLM has several Plans of Operation in already:

Gas Hills  
Bison Basin  
Sweetwater

Each BLM field office has a Resource Management Plan (RMP) which may be useful to support the site-specific cumulative impacts.

The Casper RMP is the most recent. It was suggested we review it.

BLM-Lander will comment on the GEIS.

~~Wyoming DEQ NEPA coordinator~~ offered a face-to-face discussion, if needed.

~~Mark Conrad~~  
307-777-5802  
~~mconra@wyo.gov~~

BLM and WY DEQ felt that air quality impacts were the largest cumulative impact. They suggested we work with EPA. They also suggested we work with the Governor's Planning Office. Steve Furtney is the point of contact.

Steve Furtney  
307-777-8506  
[SFurtn@state.wy.us](mailto:SFurtn@state.wy.us)

Socio-economics may be a big issue in Fremont given past history with mineral exploration. There are a number of abandoned towns in the region.

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BLM-Lander and WY DEQ suggested the following protocol:

Work directly with BLM-Lander (not with a State Coordinator).

When a license application is docketed, notify WY DEQ and BLM-Lander of the ADAMS number.

BLM and WY DEQ will work with us to share information to assist with site-specific analysis.

WY DEQ requested a project manager list with phone numbers for the anticipated applications for FY 09.

BLM-Lander said the Gas Hills application is with the NRC. Not clear that it is. BLM would like to know who to coordinate with. BLM felt their role was not recognized by the NRC.

## Meeting with BLM – Rawlins

September 25, 2008 9:30 a.m.

Attendees:

NRC: Patrice Bubar  
Alan Bjornsen

BLM: Patrick Madigan – Field Office Manager  
Dave Simons – Environmental Coordinator - 307-328-4328  
Bruce Collins – Public Affairs – 307-328-4329  
Mark Newman – 307-328-4248; [Mark\\_newman@blm.gov](mailto:Mark_newman@blm.gov)  
Claire Miller – 307-328-4245 (Minerals and Lands)  
Becky Spurgin – 307-328-4363 (Resources – wildlife, cultural, etc.)

BLM Rawlins point of contacts (POCs) to follow up with are Clare Miller and Becky Spurgin.

Rawlins recommends Memorandum of Understanding (MOU) be signed to lay out roles and responsibilities. They suggest the MOU be signed by BLM Wyoming State Office.

POCs in BLM Wyoming are:

Bill Hill – Deputy State Director

Don Simpson – Acting State Director

Bob Jansen – Acting Branch Chief – Solid Minerals  
307-775-6206

Rawlins is the Field Office for Lost Creek (UR Energy). Mark Newman met with UR Energy this week and they stated they are cutting down on operations. They will not complete drilling operations this year.

Rawlins staff further clarified the BLM role.

If a company wants to explore – if the area of disturbance is less than 5 acres – BLM issues a Notice (no real public involvement).

If the area of disturbance is greater than 5 acres, the company must submit a Plan of Operation to BLM.

If development – or ISL operations are expected to take place – a Plan of Operation must be submitted to BLM.

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The Plans of Operation are published and BLM does a NEPA document (EA) to support approval/non-approval of the plan as approval is considered a major federal action. Current status: 13 Notices; 0 Plan of Operation.

BLM does not issue any permits.

BLM is interested in cooperating with NRC so their EA and our EA could be coordinated. They recognized NRC's lead role. BLM does not want industry to be confused by having to abide by two EAs covering, essentially, the same resources. One EA should be all that is necessary.

No conventional uranium mining is currently planned for the Rawlins region.

BLM is most interested in groundwater restoration and reclamation of surface areas. Though they have their own standards, they work closely with WY DEQ.

Rawlins clarified that Wyoming has primacy for air quality – not EPA. They agreed with Lander that air quality is an issue but ozone is the main concern (it is nearing NAAQS threshold).

Rawlins mentioned that DEQ “requires” restoration to background – with no alternate concentration limit (this needs to be explored).

Rawlins will be providing comments on the GEIS (most will center on groundwater).

Similar to Lander – Rawlins recommended that DEQ be coordinated within the site-specific EAs. POCs are Melissa Bautz and Bill Hogg.

## Meeting with BLM – Casper

September 25, 2008, 2:00 pm

### BLM

Joe Meyer – Field Manager  
307-261-7600  
Joe\_meyer@blm.gov

Patrick Moore – Assistant Field Manager  
307-261-7530  
Patrick\_moore@blm.gov

Tom Foertsen – geologist – POC for follow-up  
307-261-7630  
Tom\_Foertsen@blm.gov

Ed Heffern – BLM Wyoming State Office

EAs are prepared for BLM by a third party (BLM lacks staff resources).

BLM has a discretionary 30-day public scoping period for EAs.

BLM has a required 30-day public comment period on draft EAs.

For new ISLs, a public meeting on a draft EA is not required.

In the past, there was a “breakdown” in land issues between the NRC and the BLM.

- Reynolds Ranch Expansion EA (NRC 2006)
  - Many sections left out (soils, mineral use, recreation, socioeconomics, visual and scenic, etc).
  - BLM is writing their own EA
- East Gas Hill EA (NRC 2003)
  - BLM felt totally disenfranchised during the review of this document
  - BLM felt NRC did not include many resources, but did not allow BLM to comment.

BLM has developed an MOU with WY DEQ for mineral exploration (the State holds the bond, while the BLM issues the NOI).

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BLM State Point of Contacts:

Larry Claypoole – Deputy State Director for Minerals  
Bill Hill – Deputy State Director (overall)  
Ken Peacock – NEPA Coordinator

BLM desires coordination with NRC on ISI applications.

- Schedule
- Work priorities

BLM wants to know, as soon as docketed, what ISL applications are being considered by the NRC (the sooner the BLM is involved, the better).

Possible next steps between BLM Casper and NRC;

- NRC send projections on applications to be received, PMs, schedules.
- NRC and BLM jointly developed an annotated outline of an EA
- NRC and BLM Casper set up regular communications between PMs. BLM will determine specialists availability for an integrated project team.

Casper will submit comments on the GEIS.