

GCM SERVICES INC.

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October 11, 2011

Benjamin J. Schiffer, PG
WWC Engineering
1849 Terra Ave.
Sheridan, WY 82801

Dear Ben,

Please find enclosed NRC's copy of the updated cultural resources inventory report for The Ross ISR project. This copy includes:

- a) the header "10 CFR Section 2.390(a)(3); Privileged and Confidential"
- b) the footer "Ross ISR Project; ER Addendum 3.8-A"
- c) Cover page for Addendum 3.8-A

You will recall, at his request, we sent a clean copy to Richard Currit of the Wyoming State Historic Preservation Office. Before it was sent, we made a few changes to the report. The changes we have made are as follows:

- 1) Dave went through the site forms and double checked the accuracy on Section 8c;
- 2) Changed the photo captions in the site forms to include date, photographer and image number of each;
- 3) Added photos to the site narratives in Chapter 7, which changed the Table of Contents.

If you need anything further, please do not hesitate to contact me.

Sincerely,

David M. Ferguson

David M. Ferguson
Archaeologist


enclosures

STRATA ENERGY, INC.

**AFFIDAVIT OF ANTHONY SIMPSON, CHIEF OPERATING OFFICER,
STRATA ENERGY, INC.**

1. My name is Anthony Simpson and I am the Chief Operating Officer for Strata Energy, Inc. (Strata). I am authorized to execute this affidavit on behalf of Strata and may bind Strata to the statements contained herein;
2. This affidavit is attached to Strata's submission of an application to the United States Nuclear Regulatory Commission (NRC) for a combined source and 11e.(2) byproduct material license for its proposed in situ leach uranium recovery (ISR) project to be located near Oshoto in the State of Wyoming, NRC Docket #040-09091;
3. As part of its license application, Strata submitted a Technical Report (TR) and an Environmental Report (ER) that include data, information, and other items that qualify for withholding pursuant to 10 CFR § 2.390;
4. Portions of the license application submitted by Strata include cultural resources information that could be misused by unscrupulous artifact collectors to disturb archaeological or other historic and cultural sites and that should be subject to protection from public disclosure pursuant to 10 CFR § 2.390(a)(3):
 - i. Pursuant to NRC regulations at 10 CFR § 2.390, Strata has labeled the relevant pages of its license application, including its TR and ER, that pertain to historic and cultural resource sites requiring protection from public disclosure with the mandatory statement: "10 CFR Section 2.390(a)(3); Privileged and Confidential;"
 - ii. The ER Addendum 3.8-A has been updated and contains information relating to historic and cultural resource sites requiring protection from public disclosure, and Strata hereby requests that these updates be withheld from public disclosure:
 - BLM Survey Report Cover Page,
 - BLM Site Summary Table,
 - Revised photo captions in the site forms and,
 - Additional photos in Chapter 7 Site Narratives.

5. For the following reasons, Strata asserts that the aforementioned updates of its ER regarding historic and cultural resources should be withheld from public disclosure as privileged and confidential information:
- i. The data and information contained in the above-mentioned portions of the ER are customarily held in confidence by businesses and other organizations seeking to protect information related to certain historic and cultural resources or confidential and/or proprietary business information;
 - ii. The data and information regarding historic and cultural resources or confidential and/or proprietary business information listed in Strata's license application are not available in any public sources;
 - iii. Release of the data and information contained in the above-mentioned portions of the ER may cause substantial harm to cultural resources on private and public property or Strata as a corporate entity for the following reasons:
 - a. Certain individuals may use the information to unlawfully collect cultural artifacts for personal use; and
 - b. The Wyoming State Historic Preservation office is responsible for the study and protection of cultural sites and artifacts and will be issued a full report detailing the location(s) and artifact(s) discovered;
 - iv. If it were to become publicly available, the historic and cultural resource information would provide no tangible benefit to members of the public since artifacts cannot be legally collected. Therefore, withholding the data and information designated by Strata for protection from public disclosure will not harm members of the public. However, as stated above, releasing the location of historic and cultural resource sites could result in the theft or destruction of potentially significant cultural artifacts; and
 - v. Strata fully understands that withholding the designated data and information does not deprive any independent party from inspecting the confidential information under the terms of an appropriate protective order in the context of an NRC licensing hearing or other administrative proceeding.


A. J. Simpson

Tony Simpson, Chief Operating
Officer
Strata Energy, Inc.

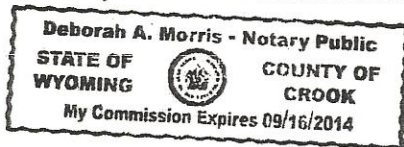
State of Wyoming)

)

County of CROOK)

The foregoing Affidavit was affirmed and acknowledged before me this 14 day of October, 2011, by Mr. Tony Simpson as Chief Operating Officer of Strata Energy, Inc., a Wyoming corporation.

Witness my hand and official seal.




Notary Public

My commission expires: 9/16/14