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# PUBLIC SUBMISSION

**Docket:** NRC-2011-0148

Strata Energy, Inc., Ross In-Situ Uranium Recovery Project, Crook County, Wyoming; Notice of Materials License Application, Opportunity to Request a Hearing and to Petition for Leave to Intervene, and Commission Order Imposing Procedures for Access to Sensitive Unclassified Non-Safeguards Information for Contention Preparation

**Comment On:** NRC-2011-0148-0007

Supplemental Environmental Impact Statement for the Ross In-Situ Uranium Recovery Project in Crook County, Wyoming

**Document:** NRC-2011-0148-DRAFT-0014

Comment on FR Doc # 2013-07332

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## General Comment

Not refer to the Generic EIS when it analyzes impacts of Strata's project.

Fully consider that the proposed uranium mining area has over 5,000 abandoned drill holes from the early days of uranium exploration. According to NRC's draft 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 draft 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.

Fully consider that the proposed ISL process has an extremely high consumptive use of water, which has the potential to draw down the aquifers that provide drinking water and water for livestock.

Consider the track record of spills, excursions, pond leaks, and failed aquifer restoration at previous uranium mines in Wyoming, Nebraska, and Texas. Impacts of past uranium projects have been significant – with routine spills, leaks, and excursions of chemicals into adjacent aquifers. 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.

Consider the cumulative impacts to water quality and quantity from the full scope of Strata's whole project, which includes this first permitted site of the Ross Project with an anticipated four additional projects in an approximately twenty mile area called the "Lance Distri

**SUNSI Review Complete**

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