

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	
)	
STRATA ENERGY, INC.)	Docket No.: 40-9091-MLA
)	
(Ross In Situ Uranium Recovery Facility))	Date: August 8, 2013
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**STRATA ENERGY, INC.’S MOTION FOR EXTENSION OF TIME TO RESPOND TO
NATURAL RESOURCE DEFENSE COUNCIL AND POWDER RIVER BASIN
RESOURCE COUNCIL’S MOTION FOR RECONSIDERATION**

Strata Energy, Inc. (Strata), by its undersigned counsel of record, hereby submits this Motion for Extension of Time to Respond to the Natural Resource Defense Council and Powder River Basin Resource Council’s (hereinafter the “Petitioners”) Motion to Reconsider or, in the Alternative, to Re-Submit Contention 4/5 on cumulative impacts regarding Strata’s license application for a combined source and 11e.(2) byproduct material license to construct and operate an in situ leach uranium recovery (ISR) facility in Crook County near the town of Oshoto in the State of Wyoming (the “Ross ISR Project”). On July 26, 2013, the Licensing Board issued LBP-13-10 in which it ruled upon the Petitioners’ request to admit several new or amended contentions. In one portion of LBP-13-10, the Licensing Board refused to admit revised Contention 4/5 and left the original Contention on cumulative impacts intact. On August 5, 2013, Petitioners filed a motion requesting that the Licensing Board reconsider its ruling on Contention 4/5 regarding potential cumulative impacts from the Ross ISR project. Based on 10

CFR § 2.323(e), Strata has ten (10) days to respond to Petitioners' Motion, which puts the due date for responses on August 15, 2013.

Due to circumstances related to travel obligations for both its litigation counsel from August 13-15, 2013, Strata respectfully requests an extension of four (4) calendar days to August 19, 2013, to file its response. Pursuant to 10 CFR § 2.323, Strata has conferred with both NRC Staff and Petitioners regarding the filing of this motion. Both the Petitioners and NRC Staff have no objection to Strata's motion. Based on the mutual agreement of all parties, Strata submits this Joint Motion and respectfully requests that the Commission, or the Presiding Officer if so designated, approve this revised filing schedule.

Respectfully submitted,

**/Signed (electronically) by/
Christopher S. Pugsley, Esq.**

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Dated: August 8, 2013

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "**STRATA ENERGY, INC.'S MOTION FOR EXTENSION OF TIME TO RESPOND TO NATURAL RESOURCE DEFENSE COUNCIL AND POWDER RIVER BASIN RESOURCE COUNCIL'S MOTION FOR RECONSIDERATION**" in the above-captioned proceeding has been served via the Electronic Information Exchange (EIE) this 8th day of August, 2013 which to the best of my knowledge resulted in transmittal of the foregoing to those on the EIE Service List for the above-captioned proceeding.

Respectfully Submitted,

**/Executed (electronically) by and in
accord with 10 C.F.R. § 2.304(d)/
Christopher S. Pugsley, Esq.**

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Dated: August 8, 2013