

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before the Licensing Board:
G. Paul Bollwerk, III, Chair
Dr. Richard F. Cole
Dr. Kenneth L. Mossman

In the Matter of)	Docket No. 40-9091-MLA
)	
STRATA ENERGY, INC.,)	ASLBP No. 12-915-01-MLA-BD01
)	
(Ross In Situ Recovery Uranium Project))	August 12, 2013

**NATURAL RESOURCES DEFENSE COUNCIL AND POWDER RIVER BASIN
RESOURCE COUNCIL'S UNOPPOSED MOTION TO AMEND THE REVISED
GENERAL SCHEDULE IN THE MATTER OF STRATA ENERGY, INC.**

The Natural Resources Defense Council and Powder River Basin Resource Council (hereafter "Joint Intervenors"), by their undersigned counsel of record, hereby submit this Motion to Amend the Revised General Schedule to provide an extension of time for submission of Summary Disposition Motions, Responses Supporting Summary Disposition Motions, and Responses Opposing Summary Disposition Motions.

As set forth in the Revised General Schedule issued April 12, 2013, Summary Disposition Motions are currently due, today, August 12, 2013, Responses Supporting are due August 22, 2013, and Responses Opposing are due September 6, 2013.

In light of the Board's Order on August 7, 2013 ordering the temporary suspension of any deadlines related to summary disposition motions or related response briefing concerning environmental contention 4/5A, the Parties to this proceeding have conferred and request that an extension of time be granted for summary disposition briefing concerning the other contentions in this proceeding. The extension of time would benefit the parties by allowing them to better

meet other travel and work related commitments. The extension of time would also provide the Board time to resolve the outstanding motion concerning environmental contention 4/5A prior to summary disposition motion briefing, which would hopefully eliminate the need for multiple summary disposition motions and responses.

Joint Petitioners have conferred with counsel for Strata Energy and NRC staff and both parties support this motion. Joint Intervenors respectfully request that the Board grant the following extensions of time: (1) Motions for Summary Disposition – September 3, 2013; (2) Responses Supporting Summary Disposition – September 13, 2013; and (3) Responses Opposing Summary Disposition – September 27, 2013.

Respectfully submitted on this 12th day of August,

/Signed (electronically) by Shannon Anderson

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing MOTION TO AMEND THE REVISED GENERAL SCHEDULE in the above-captioned proceeding were served via the Electronic Information Exchange (EIE) on the 12th day of August 2013, which to the best of my knowledge resulted in transmittal of same to those on the EIE Service List for the captioned proceeding.

/signed (electronically) by Shannon Anderson
Shannon Anderson

Date: August 12, 2013