From: ED HARVEY
To: Nicole.Picard@nrc.gov
Cc: Ellis, Twana
Subject: Docket No. 40-9075-MLA
Date: Sunday, February 09, 2014 5:06:13 PM

I have the following concerns in the matter of:
Powertech USA Inc
Dewey-Burdock in situ Uranium Recovery
Docket No. 40-9075-MLA
ASLBP No. 10-898-02-MLA-BD01

Contention 2:
Existing stock and domestic wells within 50 miles of the site should be sampled as these wells are the first ones which could be damaged by the proposed mining. Wells that have been purchased by Powertech within the site boundary also need to be included in the baseline Groundwater Quality data set, as they were once used as stock and domestic water sources.

Contention 3:
The Hydrogeological data makes no sense. Powertech contends a flow rate in the aquifer of less than 10 feet per year. Then cites pumping data which claims mining to be possible as a drop in a monitor well 1500 feet away (1/4 mile) of 8 to 9 feet occurred in 2 to 3 minutes of pump start. This would indicate a flow distance of 1 mile in less than 10 minutes. The given explanation is that the pumping causes stress on the aquifer. If so, what stress is induced by the 2600+ existing wells in Fall River and Custer counties.No studies to definitively characterize existing faults and fractures in this naturally fractured reservoir have been done. Seismic azimuthal amplitude anisotropy analysis which is used routinely in the oil industry to characterize fracture intensity and orientation could have been used. Given that this area is a natural uplift zone, both horizontal and vertical fractures will be present and need to be characterized to assess the existing pathways between aquifers. No studies have been done to characterize the impact of leach fluid excursions on flow rates or on fracture pathways between aquifers. Citing a fractured shale layer as containment between aquifers makes no sense without careful fracture mapping and characterization in the mining zone.

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