

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of

POWERTECH (USA), INC.,  
(Dewey-Burdock In Situ Uranium  
Recovery Facility)

Docket No. 40-0975-MLA  
License SUA-1600

April 14, 2014

**DECLARATION IN SUPPORT OF MOTION TO STAY**

I, DEBRA WHITE PLUME, make this declaration based upon my personal knowledge and belief and state:

1. I am a traditional Oglala Sioux and Northern Cheyenne indigenous person residing in Manderson, Pine Ridge Indian Reservation. My address is P.O. Box 71, Manderson, SD 57756. I am a grandmother and a great grandmother and have spent my life studying oral histories and traditions of the Oglala Sioux, the other Sioux Tribes, and the Northern Cheyenne and am competent to testify.
2. Western tribal peoples, including the Oglala Lakota and Northern Cheyenne, have traditionally used the low-lying areas in and around Powertech's proposed Project Area for migrating, hunting, gathering food and tool resources including lithic resources used to make such handtools as hide scrapers, we gathered medicine plants, and we used such low-lying areas within the Project Areas as well as the ridges and adjacent lands for religious, cultural and other traditional uses such as prayer sites, ceremonial sites and burial sites. Such sites are now buried by years of weathering but they are highly likely to be found in the course of sub-surface testing if it were to be conducted near springs, seasonal streams, wetlands and natural depressions that serve as collections of water. This area was part of our route through our ancient spiritual pilgrimage through geographical places on earth that correspond with constellations of stars at certain times during the year. We call this "Sacred

Above Is Sacred Below” and our ancestors and our people today follow this pilgrimage route as much as we are able to, it is called “The Red Road”.

3. Often times these sacred sites and burial grounds are marked by very small stone markers that have four (4) concentric circles visible on them when they are laid. Often these marker stones are laid out in the four (4) directions: West, North, East and South, in that order. It is virtually impossible for someone without Lakota cultural, anthropological, and/or archaeological training to spot markers such as these. There is no way the average Powertech employee, manager or bulldozer operator could have the skills and training to spot such markers, especially since they may lie several inches below the surface

4. Once these Project Area’s plans are set for roads, power, infrastructure and the like inside the Project Area, construction will begin at Powertech’s discretion. At this time, due to the lack of sub-surface testing in the low-lying areas, there is no way that anyone can know in advance if driving out in the Project Area or if any particular phase of earthwork or construction will permanently destroy native burial or ceremonial sites that may lie underneath a few inches of topsoil or hardpan. Once destroyed by crushing due to overhead construction and earthwork, the sites will be gone forever, and I (and my children, grandchildren, relatives, fellow tribal members, and our descendants) will suffer immediate and irreparable injury to our religious and cultural uses of any and all burial sites and ceremonial sites that are in the Project Area. Our people have oral histories that remember relatives who are buried in that area, their graves may not be visible to anyone but the Lakota people and we have not had the right to go in there and identify such places, in the hopes of respectfully protecting them from destruction by uranium mining and its infrastructure. The graves can be destroyed by the use of tools of any kind in mining or infrastructure

development. This is irreparable harm to me and my generations and our Nation.

5. I have read about human rights abuses and abuses of indigenous people by South Gobi Resources' coal mining operations in Mongolia and that such coal mining company was run by a man named Alex Molyneux, as CEO, who is now in control of Powertech through his Hong Kong holding company Azarga, and his Singapore based investment group, Blumont. I am attaching the reports I found as Exhibit A to this Declaration. I am concerned that Powertech, under its new management controlled by Alex Molyneux, will be prone to human rights abuses such as those that were reported in Mongolia by South Gobi Resources' coal mine.

This Declaration is submitted in accordance with 10 C.F.R. Section 2.304(d) and 28 U.S.C. Section 1746. I declare under penalty of perjury that the foregoing is true and correct.

April 14, 2014



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Debra L. White Plume