

**From:** [Carmen Horne-McIntyre](#)  
**To:** [Bollwerk, Paul](#); [Docket, Hearing](#)  
**Subject:** NRC Public Input Hearing-Strata Energy's Proposed Uranium Mining Project, Crook County, WY  
**Date:** Sunday, September 28, 2014 1:50:27 AM

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Dear Atomic Safety and Licensing Board,

I am writing out of concern for the aforementioned proposed uranium mining project. As a recent transplant to Crook County, I do not have a firm grasp of the timeline with which this project has progressed. However, what I have reviewed about the environmental impact statement for the project concerns me. Specifically, I am concerned about the lack of a detailed, site-specific environmental impact statement for the proposed project. In addition to fears over adequate evaluation of environmental and social impacts, I am especially concerned with the lack of analysis of impacts on groundwater quality and quantity. I support a moratorium on the granting of any new ISL uranium mining licenses until the NRC develops stronger groundwater protection rules.

I strongly agree with the concerns provided below, as summarized by the Powder River Basin Resource Council:

1. NRC's EIS does not accurately assess baseline groundwater conditions at Strata's site. Accurately assessing baseline groundwater conditions is critical to determine future impacts related to uranium recovery operations.
2. NRC's EIS is deficient because it does not fully consider that the proposed uranium recovery area has over 5,000 abandoned drill holes from the early days of uranium exploration. According to NRC's 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 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.
3. Consider the track record of failed aquifer restoration at previous uranium mines in Wyoming, Nebraska, and Texas. 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.

In addition to these concerns, the EIS should more adequately address the projected economic gains of the proposed project versus post-project clean-up costs, potential remediation costs of impaired groundwater, and other costs that states and communities often bear including consideration of potential damage to future agricultural and residential uses of the land.

Thank-you for your consideration,  
Carmen McIntyre

Crook County Resident