## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## ATOMIC SAFETY AND LICENSING BOARD

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)	)	October 14, 2014

## NATURAL RESOURCES DEFENSE COUNCIL AND POWDER RIVER BASIN RESOURCE COUNCIL'S UNOPPOSED MOTION TO AMEND THE DEADLINE FOR SUBMISSION OF TRANSCRIPT CORRECTIONS

The Natural Resources Defense Council and Powder River Basin Resource Council (hereafter "Joint Intervenors"), by their undersigned counsel of record, hereby submit this Unopposed Motion for a two-day extension of time for submission of joint proposed Transcript Corrections for the evidentiary hearing in this matter held on September 30 and October 1, 2014. The reasons for this request are as follows:

- 1. At the conclusion of the evidentiary hearing, the Board indicated that hearing transcripts would be released in the next few days, and that the parties should confer on corrections and make a joint submission of proposed corrections no later than October 14, 2014. The transcripts were released on October 6 and 7, 2014, and on October 8, 2014 the Board entered an Order with the October 14, 2014 deadline. However, the Board also indicated at the hearing (at page 787, lines 3-6) that if additional time is necessary, the parties should so inform the Board.
- 2. The parties have been working diligently on corrections. However, the parties have discovered significantly more proposed corrections than they anticipated, and were not able to complete the sharing of initial lists of proposed corrections until yesterday. These proposed

corrections include both statements of the parties' witnesses and counsel, and also statements by the Board.

- 3. In order to complete a joint submission, the parties will compare their lists and discuss any areas requiring further consultation. They may also need to consult with one or more of their experts to further confirm the accuracy of some of the corrections.
- 4. Counsel for Joint Intervenors have conferred with counsel for Staff and Strata, Inc., each of whom concurs that the proposed brief extension is necessary and appropriate to permit the parties to submit a complete and accurate list of proposed corrections.

For the foregoing reasons, Joint Intervenors respectfully request that the Board grant their motion and extend the transcript corrections deadline to October 16, 2014.

Respectfully submitted on this 14th day of October, 2014

/Signed (electronically) by Shannon Anderson Shannon Anderson, Staff Attorney Powder River Basin Resource Council 934 N. Main St. Sheridan, WY 82801 Tel: (307) 672-5809/Fax: (307) 672-5800 sanderson@powderriverbasin.org Counsel for Powder River Basin Resource Council

/Signed (electronically) by Geoffrey Fettus Geoffrey H. Fettus, Senior Project Attorney Natural Resources Defense Council, Inc. 1152 15th St., NW, Suite 300 Washington, D.C. 20005 Tel: (202) 289-6868/Fax: (202) 289-1060 gfettus@nrdc.org Counsel for NRDC

/Signed (electronically) by Howard M. Crystal Howard M. Crystal Meyer Glitzenstein & Crystal 1601 Connecticut Ave., N.W., Suite 700 Washington, D.C. 20009 (202) 588-5206 <u>hcrystal@meyerglitz.com</u> *Counsel for NRDC* 

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing MOTION TO AMEND THE DEADLINE FOR SUBMISSION OF TRANSCRIPT CORRECTIONS in the above-captioned proceeding were served via the Electronic Information Exchange (EIE) on the 14th day of October 2014, 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 Howard Crystal Howard Crystal

Date: October 14, 2014