

**From:** [James W. Kelly, Jr.](#)  
**To:** [Docket, Hearing](#)  
**Subject:** [External\_Sender] Docket No.40-8943 Crow Butte / License renewal  
**Date:** Friday, August 28, 2015 6:09:28 PM  
**Attachments:** [Valid reasons to discontinue Cameco.docx](#)

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Enclosed is a comment statement filled out with an attachment page of comments IN MY OWN WORDS.  
Sincerely, James W. Kelly, Jr.

In the matter of Crow Butte Resources Inc.  
License Renewal for the In Situ Leach Facility, Crawford Nebraska

Docket No. 40-8943  
ASLBP No. 08-867-02-OLA-BD01

Please consider this as my written comment statement to this matter.

Name JAMES W. KELLY, JR.

Address 816 2nd Street, CRAWFORD, NE 69339

Phone (308) 665-1428

How far away from my property is Crow Butte Resources ISL uranium mine? 2 miles

1. Do you or anyone in your home have health issues? NO

Examples \_\_\_\_\_

2. Do you have issues with your water on your property? ? NOT SURE

Examples \_\_\_\_\_

3. Do you believe that In Situ Leach mining can damage ground water, aquifers? YES, DEFINATELY

4. Do you believe recent research on In Situ leach mining should be considered? YES

5. Do you believe the Oglala Sioux Tribe, as neighbors should have been formally consulted in the permit process? YES DEFINATELY

6. Do you believe the Final Environmental Assessment violates the National Environmental Policy Act in concluding that the short-term impacts from consumptive ground water use during aquifer restoration are MODERATE? NOT SURE

7. Do you believe the Final EA violates policies and regulations by failing to include discussion of ground water restoration mitigation measures? YES

8. Do you believe the Final EA omits discussion of the impact of tornadoes on the license renewal area, and inadequately discusses the potential impacts from the land application of ISL mining wastewater? YES

9. Do you believe the Final EA violates the National Environmental Policy Act in its failure to provide an analysis of the impacts on the project from earthquakes; especially as it concerns secondary porosity and adequate confinement? \_\_\_\_\_

IN MY OWN WORDS:

PLEASE READ the attached sheet containing pertinent information why ISL Mining should cease and be discontinued for the future. One point that should be considered about the water usage. Cameco uses far more water direct from the aquifer than anyone is aware of. U.S. Ranchers and Farmers who irrigate have to pay for usage as well as towns people are billed for their water usage. I will stand corrected if shown where Cameco is paying their fair share for water. Is it FREE for Canadians while Americans have to pay dearly for it?

**Valid reasons to discontinue Cameco's ISL mining at Crow Butte in Crawford, NE.** By J.W.Kelly, concerned citizen

1. Cameco is a Canadian multinational Corporation and a guest in our country. They have had the privilege of access to our natural resources via mine licensing. They are asking for renewal and expansion which will be a disaster to this region. Their past performance has been poor if not deplorable. They have consistently ignored or neglected U.S NRC and EPA Rules and Guidelines. They have incurred numerous violations and fines for their operation yet have not made any improvements. They have contaminated ground water and aquifers in Texas, Wyoming and Nebraska and created great health threats to millions of people.
2. The geologic land conditions in the Nebraska panhandle are not suitable for ISL mining. The soil consists of unconsolidated porous, alkaline sand and gravel intermixed with consolidated rock and outcroppings of sandstone and limestone which are peppered with fissures and cracks allowing water to travel .
3. The Ogalalla Aquifer extends over a huge area from the South Dakota and the Nebraska border all the way south to Texas. It co-insides with the most productive agricultural region of the country and supplies millions of people's drinking water. Much like the old adage "one bad apple spoils the whole" Therefore, to contaminate any portion of the aquifer will ultimately contaminate the whole. Toxins and contaminants already exist in the aquifer and White river but to what degree is unknown. In Edgemont and Custer South Dakota the water in the Arikaree aquifer (in proximity to Ogalalla) is contaminated and not fit for human consumption as a result of improper storage of uranium tailings (waste). At a Douglas Wyoming Cameco ISL facility 800 million gallons of water has been contaminated during their operations. The toxic chemicals used like ammonia, sulfuric and hydrochloric acid cause severe environmental impact and long term irreversible changes to ground water.
4. I was not present at the time but I suspect that the original license was given under false pretences with a fabrication of health and safety. I think the town was so eager to get jobs, that water, safety and health were overlooked. Not to mention the ranchers and farmers here were not supplied with true information about ISL Mining. Cameco has been very disingenuous to the town . The literature they send out states that the aquifer is safe and pure, there are no leaks, spills or accidents and they don't use anything stronger than bi-carbonate of soda or salt water. This is not true, here is one example: February 4,2015- Rapid City Journal reported: A truck from Denver, Co. turned over on the highway 2 miles from the Crow Butte Mine as it was making a delivery of Hydrochloric Acid to the facility. An undetermined amount was spilled.
5. Another point is the risk to health and environment is much greater than any gain that could be expected. It does nothing to benefit the area other than a few jobs and is of no benefit to the country at this time. The current value of Cameco stock has dropped 2.8%. Cameco reports that it possesses 492 million lbs. of yellow cake uranium. Normally that would be good, however, the world market is flooded and over stocked with yellow cake uranium and low demand for it. Yellow cake previously was worth in excess of \$100.a lb. The price now has fallen to \$34.49 a lb. Production costs put it at \$40. a lb. so it is not profitable to mine.
6. ISL Uranium mining has been a grave health threat to people, livestock, crops and wildlife since it's inception. More often than not the toxins and contaminants always seep into the ground water and increase cases and risk of cancer for people that work at the mine and those that live nearby. Leading geologists and hydrologists claim that ground water contamination can occur at all phases of ISL mining: Exploration phase, Production phase and even the Restoration phase when not performed competently.
7. Lastly it should be noted that in a town that barely sports 1000 people we have a dedicated volunteer fire dept. that has done a remarkable job battling forest , grass and town fires. Nonetheless , they have not had the opportunity for Hazardous Material training nor do they have the appropriate gear or equipment for handling toxic or hazardous events. The nearest HazMat professionals are 75 to 100 miles away from Crawford.
8. My final comment is that continuing to mine this area as it's been done can lead to a catastrophe of biblical proportions and create a 1000 mile Dead Zone in the Heartland and breadbasket of America with countless pain and suffering to innocent people whom are completely unaware of this situation or hazard at hand.