

StrataRossKenExSEISCEM Resource

From: paul@themailpath.com
Sent: Sunday, April 17, 2016 9:39 AM
To: StrataRossKenExSEIS Resource
Subject: [External_Sender] Comments: Docket ID NRC-2011-0148

Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Please consider the following comments for Docket ID NRC-2011-0148

* NRC should consider that the proposed uranium mining and processing area has over 5,000 abandoned drill holes from the early days of uranium exploration. Strata must be required to locate and plug these old exploration wells prior to mining. Old wells in the area could serve as conduits for water contamination from Strata's project. NRC has identified that water contamination could result from "improperly plugged previous exploration drillholes that have not yet been properly abandoned." 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.

* NRC should consider that the proposed mining and processing process has an extremely high consumptive use of water, which has the potential to draw down the aquifers that provide drinking water and water for livestock.

* NRC should consider the track record of spills, excursions, pond leaks, and failed aquifer restoration at previous uranium mines in Wyoming, Nebraska, and Texas. Impacts of past uranium projects have been significant – with routine spills, leaks, and excursions of chemicals into adjacent aquifers. 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.

* NRC should consider the cumulative impacts to water quality and quantity from the full scope of Strata's whole project, which includes this first permitted site of the Ross Project with an anticipated four additional projects in the approximately twenty mile area of the "Lance District" in Crook County.

* Strata should not be allowed to expand until Powder River Basin Resource Council's appeal for the Ross Project is settled

* There is a need to minimize light pollution and other industrial impacts to landowners in the Oshoto area and to Devil's Tower National Monument.

* There is a need to minimize impacts to livestock grazing and recreation in the area.

* There is a need to minimize impacts from truck traffic, dust, and noise.

Thank you for your consideration of these comments.

Sincerely,

Paul Moss
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